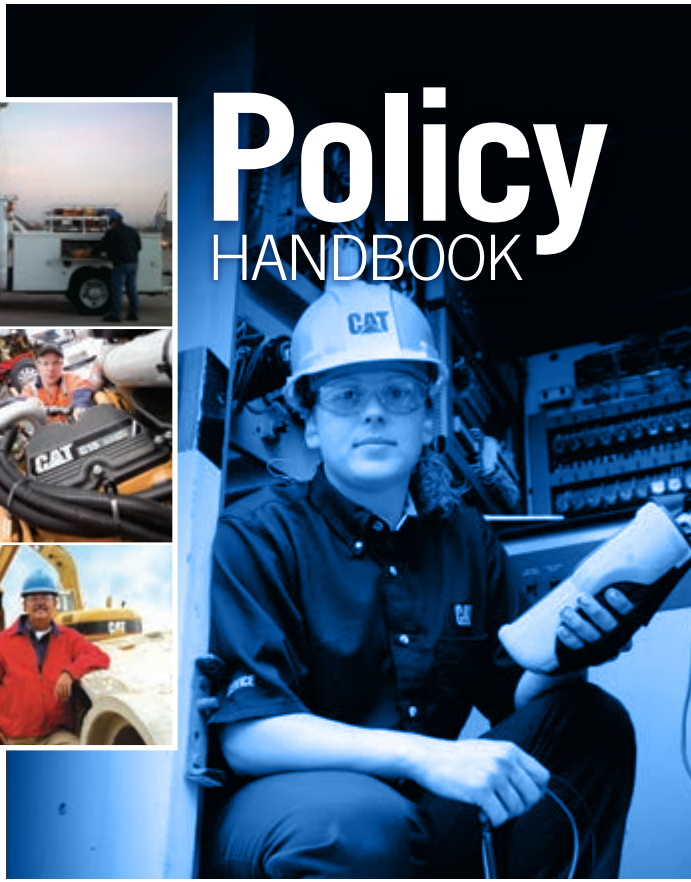
ENVIRONMENTAL HEALTH & SAFETY

Policy HANDBOOK



Revision #3, March 2015

WARREN EQUIPMENT COMPANY.

WARREN CAT ISC SITECH PSP

I acknowledge that I have received a copy of WEC's Environmental, Health & Safety ("EHS") Handbook. I understand that this Handbook contains summaries of important EHS policies and procedures. A more comprehensive set of EHS policies and procedures can be found in the WEC Safety Manual located on the World of Warren (WOW) intranet. I understand that it is my responsibility to read, understand and comply with all WEC policies, rules and procedures. I further acknowledge that if there is any policy or provision in this Handbook that I do not understand, I will seek clarification from the EHS Department.

I am aware that violation of these policies and procedures could result in disciplinary action, up to and including termination of employment. Contractors and their employees are also required to comply with all WEC policies and procedures.

_____ _____
Employee Name (Print) Location

_____
Company Name

_____ _____
Employee Signature Date

Upon receipt of this manual, sign and return this page to the attention of the EHS Director via intercompany mail. Completed forms can also be sent by U.S. Postal Service to:

Attention: EHS Director
Warren Equipment Company
P.O. Box 60758
Midland Texas 79711-0758

ENVIRONMENTAL, HEALTH & SAFETY PROTECTION POLICY

Warren Equipment Company (WEC) believes that every employee is an equal partner in contributing to a safety culture that promotes zero workplace injuries. WEC believes that all safety incidents are preventable, and that no job is so important and no service is so urgent that it cannot be performed safely. This value is reflected in our EHS Core Value: *"Our goals are simple – no incidents, no harm to people and no damage to the environment"*. WEC policy is to manage all operations in a manner that protects the environment and the health and safety of employees, customers, contractors, and the public. To accomplish this we will:

- Advise each manager, supervisor and employee of safety, health and environmental requirements and hold them accountable for their performance;
- Provide proper equipment, safety and engineering support and safe facility designs;
- Comply with laws and regulations governing safety, health and environmental protection;
- Recognize the importance of safety, health and environmental factors where there is competition with economic factors;
- Provide professional staff to support safety, health and environmental protection;
- Monitor, evaluate and report performance in safety, health and environmental protection;
- Provide safety and operations training needed to protect human, environmental and physical resources; and
- Participate in programs designed to enhance knowledge and improve technology, laws and regulations.

Employees who fail to follow WEC policies and procedures referenced in this handbook are subject to disciplinary action as specified in the WEC Employee Handbook, up to and including termination.

TABLE OF CONTENTS

Environmental, Health & Safety (EH&S)
Policy Handbook

1. OVERVIEW

1.1 Environmental Health & Safety Department (EHS)

1.1.1 Incident Reporting & Investigation

1.1.2 Audits & Inspections

1.2 Safety Orientation

The purpose of a safety orientation is to provide new employees and visitors of local emergency procedures, and other key site specific safety and health issues.

1.2.1 Hosts are responsible for ensuring that each visitor signs in and receives summary training on emergency notification and evacuation procedures.

1.2.2 Before any new hire begins work, supervisors must ensure that training is provided on typical local workplace hazards, safety expectations, and key safety and health procedures. Instruction must also be provided on the local emergency notification system, evacuation routes, and rally points.

1.3 Safety Meetings

Safety meetings are essential to the success of our safety program and supervisors will ensure timely safety training meetings. A list of attendees and presenters should be prepared and discussion items noted using the standard EHS training roster form maintained by EHS. The primary types of safety meetings are:

1.3.1 Scheduled: These meetings are generally scheduled by the site supervisor or EHS and are held to discuss site safety issues, regulatory issues, upcoming project safety concerns, incidents and action items.

1.3.2 Safety Committee*:* These are meetings of the local Safety Committee which is made up of representatives of the workforce and held on a recurring basis.

1.3.3 Tailgate or Toolbox*:* These meetings by the work team should be held on a daily to weekly basis. They should address common hazards that may be presented by the day's work, hazards associated with new equipment or personnel in the work area, provisions for ensuring the safety of new employees

(e.g., Short Service Employees), recently identified safety trends, as well as any issues members of the work team have identified.

1.3.4 Pre-job: These meetings shall be conducted at the job-site prior to beginning unfamiliar or hazardous operations, prior to beginning any task involving two or more persons; or when the scope of the task being done changes. These meetings should identify the potential safety, health or environmental hazards of the task at hand

1.4 Individual Responsibilities

It is the responsibility of all WEC employees, contractors and visitors to strictly adhere to the Company's EHS policies & procedures at all times; including safety provisions found in this *EHS Policy Handbook*, applicable sections in the *WEC Employee Handbook*, the *WEC Safety Manual*, and the *WEC Environmental Management Plan*. Additionally responsibilities include:

1.4.1 Employees

1.4.1.1 Demonstrate "safety starts with me";

1.4.1.2 Take responsibility for your safety and the well-being of fellow employees;

1.4.1.3 Understand and adhere to all safety policies and practices;

1.4.1.4 Be actively engaged in safety;

1.4.1.5 Identify, correct and communicate unsafe conditions and unsafe behavior; and

1.4.1.6 Immediately report all work-related injury, vehicle safety and environmental incidents to a supervisor.

1.4.2 Supervisors & Managers

1.4.2.1 Demonstrate commitment by setting clear expectations and by being the example for safety;

1.4.2.2 Train & coach employees with daily safety conversations;

1.4.2.3 Recognize and reward safe behavior;

1.4.2.4 Identify, investigate and correct unsafe conditions and unsafe behavior;
1.4.2.5 Encourage active involvement in safety; and
1.4.2.6 Hold all employees and contractors working under their direction accountable for safety.

1.4.3 Contractors

Contractors working for WEC must abide by WEC EHS policies and procedures, and comply with applicable federal, state and local safety laws, rules and regulations necessary to prevent injury to persons or damage to property and the environment. Contractors are responsible for:

1.4.3.1 Strictly enforcing WEC and contractor safety rules and standards and holding employees accountable;
1.4.3.2 Holding meaningful pre-job safety meetings prior to job execution, and as needed during work;
1.4.3.3 Ensuring that their employees are trained, knowledgeable, and qualified in WEC safety rules and standards and in job specific procedures;
1.4.3.4 Not operating WEC equipment without the WEC supervisor or their designee's approval, except in a life-threatening situation;
1.4.3.5 Signing in at the receptionist's desk and notifying their WEC contact prior to arrival or as soon as they arrive on premises;
1.4.3.6 Showing proof of qualification/certification as required, such as H_2S and Lockout/Tagout training, crane & forklift operation certification, or welding qualification;
1.4.3.7 Providing and properly maintaining necessary safety equipment for their employees;
1.4.3.8 Immediate reporting of injuries, incidents and unsafe acts/conditions, no matter how slight (including property damage) to the WEC supervisor or their designee; and

1.4.3.9 Designating and providing a representative on site who can communicate with all contract personnel and the WEC supervisor.

1.5 Behavioral Expectations

Every employee and contractor is expected to exhibit and champion the behavioral expectations:

1.5.1 10 Commandments of Safety

1.5.1.1 Everyone is responsible for their own safety and the safety of others.
1.5.1.2 All incidents are preventable.
1.5.1.3 Follow Company rules, requirements, policies, and procedures.
1.5.1.4 Assess the risks - Stop and Think before working.
1.5.1.5 Be proactive about Safety.
1.5.1.6 If you're not trained then don't do it.
1.5.1.7 Manual Handling – manage every lift to prevent injury.
1.5.1.8 Don't take shortcuts.
1.5.1.9 Practice good housekeeping.
1.5.1.10 Be Prepared – know emergency procedures

1.5.2 A meaningful pre-job safety meeting must be held immediately preceding the job to determine potential hazards and applicable company EHS policies and procedures that must be followed. The meeting will include a step-by-step review of work to be performed and injury prevention techniques to be used to address potential hazards by those performing the work.
1.5.3 No work may be started in any area, or on any equipment, without the knowledge and consent of the WEC supervisor or their designee.
1.5.4 When performing each work task, personnel are expected to be positioned in a way that minimizes placing themselves in the line of fire (high risk area) if a failure should occur.
1.5.5 All visitors and contractors are required to follow WEC Safety Manual policies and procedures when

performing work at a WEC facility or on behalf of WEC, and must have the permission of a WEC representative prior to beginning work on company premises or a Company jobsite.

1.5.6 Horseplay or fighting on WEC premises is prohibited.

1.5.7 The use, possession, transportation or sale of illegal drugs, alcoholic beverages, firearms, deadly weapons or unauthorized explosives while on WEC premises or in WEC vehicles is prohibited. Refer to the *WEC Employee Handbook* for more details regarding the company's illegal & prescription drug and alcohol policy.

1.5.8 Smoking is prohibited on WEC premises except in designated areas.

1.5.9 Maintain 3-point contact at all times when ascending or descending stairways, machinery, equipment, and other elevated work platforms.

1.5.10 Running in work areas, except for emergency purposes, is prohibited.

1.5.11 Finger rings, loose clothing, unsecured long hair, and other loose accessories are not to be worn in operating areas while performing work such as ascending/descending ladders and stairs, working with powered hand tools, working near rotating equipment, operating valves, etc.

2. "LIFE-CRITICAL" PROCEDURES

The following procedures are regarded as life critical because failure to fully implement any one of these can result in fatality or serious injury. This does not mean that other WEC Safety Manual procedures summarized in this EHS Handbook are any less important. A summary of life critical procedures is provided in this section and employees are advised to refer to the actual WEC Safety Manual for full procedural details.

2.1 Lockout/Tagout (LOTO) Energy Isolation

The LOTO Energy Isolation procedure found in the WEC Safety Manual defines what steps must be taken to protect company

employees and contractors from the unexpected release of potential hazardous energy. The procedure establishes requirements that must be followed for locking and tagging out energy-isolating devices during installation, maintenance, service, and repair activities involving hazardous energy sources.

2.1.1 Prior to the start of any job, a thorough evaluation of the task to be completed shall be performed to identify any and all sources of energy which could be a hazard if released during the job. This review shall be conducted by knowledgeable personnel and shall include review of drawings and on-site inspection as appropriate. A method for isolating all potential sources of energy shall be determined (e.g., pulling a plug, opening a disconnection switch, removing a fuse, de-energizing circuits, blinding, closing a valve, bleeding a line, placing a block in equipment, etc.). The supervisor or supervisor's designee shall approve energy isolation procedures prior to the start of work. For complex projects involving multiple potential sources of energy to be isolated or complicated systems, supplementary documentation may be required along with the isolation list (e.g., drawings, detailed isolation procedures, etc.). Potential energy sources, locations and methods for isolation shall be a major topic during the pre-job safety meeting that is required prior to the start of work. All individuals working on the job shall be aware of potential hazards and warned not to remove isolation devices.

2.1.2 The same basic steps for energy isolation shall apply to all energy sources such as, electrical, process flow, hydraulic, pneumatic, mechanical, potential, etc. All employees and contractors are required to follow the LOTO procedure in order to isolate energy sources before performing work on company-owned equipment, machinery, or facilities.

2.1.3 Authorized personnel shall adhere to the customer's LOTO procedure when operating under a customer-initiated LOTO on customer equipment.

2.2 Fall Protection, Ladders & Scaffolds

2.2.1 Fall Protection is the backup system that is required to protect an employee or contractor from injury when work is being performed on an elevated surface. An elevated surface is defined as any area where work is to be performed that is six (6) feet or more above ground level or the adjacent floor. Every elevated work surface requires the use of some form of fall protection. Fall protection systems include personal fall arrest systems, fall guarding, fall restraint, warning line system, and safety monitoring system. Employees and contractors are required to follow the *'Fall Protection'* procedure located in the WEC Safety Manual whenever for working on an elevated work surface. This document includes requirements for:

2.2.1.1 Employee training and designation of competent persons;

2.2.1.2 Supervisors ensuring availability of resources and proper equipment necessary for employees to meet fall protection requirements;

2.2.1.3 Approved fall protection system and anchorage point specifications and requirements;

2.2.1.4 Monthly and pre-use inspection of fall protection equipment and replacement as necessary; and

2.2.1.5 Proper storage of fall protection equipment.

2.2.2 *Care and Use of Ladders*

2.2.2.1 Ladders must be inspected prior to use and maintained in good condition. Fittings must be tight and secured and movable parts should operate freely without binding or excessive play. Ladders with broken rungs, missing steps, or broken side rails are not to be used under any circumstances and must be disposed.

2.2.2.2 The base of a straight ladder should be placed approximately one-fourth (1/4) of the length of the ladder away from the vertical wall to obtain the proper angle.

2.2.2.3 Never use a straight ladder without safety feet.

2.2.2.4 Ensure rungs are kept free of grease and oil.

2.2.2.5 Ladders are to be used by one person at a time unless the ladder is designed to carry two.

2.2.2.6 Tie off the top of straight ladders before use and assure ladder bases are secure to prevent slippage slip. The top of any straight ladder must extend at least three feet beyond the top surface.

2.2.2.7 Never use a ladder as a horizontal piece of scaffolding.

2.2.2.8 Do not use a ladder in front of door openings unless the doors are blocked opened, locked or otherwise guarded.

2.2.2.9 Do not place a ladder on chairs, boxes, vehicle beds, or other unstable surfaces to gain additional height.

2.2.2.10 Always face the ladder when traveling up or down and don't use the top of a ladder as a step.

2.2.2.11 Metal ladders must not be used where they may come in contact with electrical hazards.

2.2.2.12 Ladders must not be painted. This may hide defects or cracks which could make the ladder unsafe to use.

2.2.3 *Scaffolds*

2.2.3.1 All scaffolds must be constructed in accordance with OSHA standards outlined in 29 CFR 1910 & 1926.

Note: *Employees are encouraged request assistance from EHS in meeting this requirement.*

2.2.3.2 All scaffolds must have a top rail, mid rail and a 4 inch toe board if the scaffold floor is more than 6 feet above the ground floor.

2.2.3.3 All scaffold planks must be secure so they cannot be moved easily.

2.2.3.4 All scaffold planks must extend over their end supports not less than 6 inches, not more than 18 inches.

2.2.3.5 Boxes, drums, and other makeshift devices must not be used for scaffold supports.

2.2.3.6 An access ladder or equivalent safe access must be provided.

2.3 Entering a Confined Space

2.3.1 A "confined space" is an area that is not necessarily designed for people but large enough for workers to enter and perform certain jobs. A confined space has limited or restricted means for entry or exit and is not designed for continuous occupancy. Confined spaces include, but are not limited to, tanks, vessels, silos, storage bins, hoppers, vaults, pits, manholes, tunnels, equipment housings, ductwork, pipelines, etc.

2.3.2 A permit-required confined space has all of the above elements PLUS:

2.3.2.1 Known or potential hazards that cannot be eliminated OR

2.3.2.2 A hazardous atmosphere that cannot be maintained in a safe condition through continuous forced air ventilation.

2.3.3 The *'Entering a Confined Space'* procedure located in the WEC Safety Manual details requirements that must be followed whenever a confined space entry occurs, with *confined space entry* being defined as the process of a worker's face or body passing through the opening to a confined space. The procedure is necessary to protect employees from exposure to

significant life threatening hazards that confined spaces may present, including:

2.3.3.1 Toxic or low oxygen hazardous atmospheres;

2.3.3.2 Hazardous substances;

2.3.3.3 Temperature extremes;

2.3.3.4 Hazardous energy sources; and

2.3.3.5 Physical hazards such as sharp surfaces or mechanical energy from rotating equipment.

2.4 Electrical Safety

2.4.1 The WEC Safety Manual document entitled *'Electrical Safety'* details the company's program for protecting employees from electrical hazards in accordance with OSHA's electrical safety regulations and National Fire Prevention Association (NFPA) Standard 70E.

2.4.2 Relationship between OSHA & NFPA 70E

2.4.2.1 OSHA has enforceable requirements for electrical safety in the workplace. To address hazards related to electrical safety, OSHA relies upon the consensus standards established by NFPA in its 70E standard. National Fire Protection Association (NFPA) standard 70E entitled *"Electrical Safety in the Workplace"*. This standard outlines the specific practices and standards to be followed by WEC employees protect against arc flash and other major electrical hazards. NFPA 70E provides the framework for complying with the following OSHA requirements for electrical safety.

2.4.2.1.1 §1910.132(d)(1): Requires employers perform a personal protective equipment (PPE) hazard assessment to determine necessary PPE.

2.4.2.1.2 §1910.269(l)(8)(i): Requires estimate of incident energy be determined.

2.4.2.1.3 §1910.332(b). Employees shall be trained in and familiar with the safety-related work practices required by §1910.331

through §1910.335 that pertain to their respective job assignments.

2.4.2.1.4 §1910.333(b)(2)(iv)(B): A qualified person shall use test equipment to test the circuit elements and electrical parts of equipment to which employees will be exposed and shall verify that the circuit elements and equipment parts are de-energized…"

2.4.2.1.5 §1910.335(a)(1)(i): Employees working in areas where there are potential electrical hazards shall use electrical protective equipment appropriate for the specific parts of the body for the work being performed.

2.4.2.1.6 §1910.335(a)(1)(iv): Requires employees wear nonconductive head protection whenever exposed to electric shock or burns due to contact with exposed energized parts.

2.4.2.1.7 §1910.335(a)(1)(v): Employees shall wear protective equipment for the eyes or face wherever there is danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from an electrical explosion.

2.4.2.1.8 §1910.335(a)(2): Employees shall use insulated tools or handling equipment when working near exposed energized conductors or circuit parts.

2.4.2.1.9 §1926.28(a): Employer shall require employees wear appropriate personal protective equipment during construction work.

2.4.3 The primary focus of the *WEC Electrical Safety* program is to ensure NFPA 70E standards are followed for establishing an electrically safe work condition, meaning

that equipment is fully de-energized and cannot be re-energized while work is being performed. The following steps should be followed to create an electrically safe work condition:

2.4.3.1 Determine all possible sources of electrical energy to the equipment;

2.4.3.2 Interrupt load current and open disconnecting devices for all sources;

2.4.3.3 Where possible, visually confirm that disconnecting devices are open;

2.4.3.4 Follow the WEC Safety Manual procedure entitled *'Lockout/Tagout Energy Isolation'*;

2.4.3.5 Verify that equipment is de-energized using a voltmeter. Until equipment is tested, assume that it is still energized; and

2.4.3.6 Use grounding devices where the possibility of stored energy or induction exists.

2.4.4 Creating an electrically safe work condition is the first line of defense against arc flash and must be used in every situation, with the following exceptions:

2.4.4.1 When de-energizing equipment would create a greater hazard, such as when life-support equipment, ventilation equipment in a hazardous environment, or similar safety equipment would be de-energized;

2.4.4.2 When de-energizing is not possible due to equipment design, such as when the equipment is part of a larger continuously-operating system; and

2.4.4.3 When the nature of the work to be performed requires that equipment be energized--for instance, when checking voltage.

2.4.5 Because it is not always possible to de-energize equipment before beginning work, supervisors must ensure the following steps are taken to minimize the risk of live electrical work performed at a company or customer location:

2.4.5.1 Develop a safety work plan with defined responsibilities;
2.4.5.2 Ensure arc flash hazards are calculated for relevant equipment to be worked on;
2.4.5.3 Provide and use appropriate PPE for live work;
2.4.5.4 Ensure work is performed only by qualified persons. A qualified person is "one who has skills and knowledge related to the construction and operation of the electrical equipment and systems, and has received safety training on arc flash hazards and safe work practices";
2.4.5.5 Provide appropriate tools for working with energized equipment; and
2.4.5.6 Place warning labels on equipment that poses an arc flash risk

2.4.6 Electrical equipment such as switchboards, panel boards, industrial control panels, meter socket enclosures, and motor control centers are likely to require examination, adjustment, servicing or maintenance while energized, must be field marked with a label containing all the following information:
2.4.6.1 Nominal system voltage;
2.4.6.2 Arc flash boundary; and
2.4.6.3 At least one of the following:
2.4.6.3.1 Available incident energy and the corresponding working distance, or the arc flash personal protective equipment (PPE) category for the equipment, but not both;
2.4.6.3.2 Minimum arc rating of clothing; or
2.4.6.3.3 Site-specific level of PPE.

2.4.7 All tools used to work on energized electrical equipment must be non-conductive. Voltmeters should be insulated and voltage-rated for the equipment. In some situations, long-handled tools may also be appropriate, as even a small increase in working distance can cause a significant drop in incident energy.

2.5 Hydrogen Sulfide (H2S)

H2S gas occurs naturally in many industries and locations where the Company employees may perform work including, but not limited to: gas wells, sewage treatment plants, mines, pulp and paper manufacturing, concentrated animal feed operations, chemical manufacturing and landfills. It is an extremely deadly, toxic gas that in its pure state is colorless and heavier than air. It cause death if inhaled even at relatively low concentrations and the *'immediately dangerous to life and health (IDLH)'* concentration is very low at 100 parts per million (PPM). H2S It has the odor of rotten eggs at extremely low concentrations (0.13 parts per million, or PPM), at higher concentrations it can rapidly paralyze the olfactory nerves (sense of smell) such no odors can be detected. H2S is also flammable and poses an explosion hazard if not handled properly.

The '*H2S Procedure'* is located in the WEC Safety Manual details requirements for any employee who performs work at an H2S location. This procedure prescribes that, prior to the commencement of work activities on location where H2S may be present, the customer should be asked to provide information that will used to determine if the facility is an H2S location and, if so, what H2S concentrations employees may be exposed to. This information should be updated at regular intervals for oil and gas locations due to the fact that H2S concentrations commonly increase over time. For work locations that meet the definition of an H2S location, which is defined as an area with known concentrations of H2S above 10 PPM, the customer should be asked to provide the site-specific H2S contingency plan for the location. This plan shall be made available so that all on-site employees are familiar with the content and location of the plan. Other key procedural requirements are as follows:

2.5.1 Buddy System Requirements. Any work location with H2S concentrations greater than 10 ppm is considered an H2S Location. Respiratory protection must be used when working at any H2S Location. The Buddy System (i.e., practice of pairing two or more people for mutual safety assistance) is required at H2S Locations

of ≥ 100 PPM, and/or 10 - 99 PPM with limited cell phone service.

2.5.2 *Supervisors* are responsible for ensuring that:

2.5.2.1 All reasonable efforts are made to obtain information from the customer for use in estimating potential atmospheric H2S locations at a given work location before work begins;

2.5.2.2 Reviewing the customer's H2S Contingency Plan and safety procedures with employees. The H2S Contingency Plan is a site-specific written document that provides an organized plan for alerting and protecting the public within an area of exposure following the accidental release of potentially hazardous H2S amounts.

2.5.2.3 Employees assigned to work at locations where H2S is known to be present, or suspected to be present in any concentration, have been trained in H2S safety within the last 12 months.

2.5.2.4 Supervisors are also responsible for ensuring that employees working at a H2S location:

2.5.2.4.1 Have received training in H2S safety as per ANSI/ASSE Z390.1-2006 standards within the last 12 months;

2.5.2.4.2 Have been provided with a copy of the H2S procedure located in the Safety Manual and are familiar with its content;

2.5.2.4.3 Have been trained in Cardiopulmonary Resuscitation (CPR) and First Aid;

2.5.2.4.4 Have been medically approved to wear respirators and trained on the safe use of respirators, including a respirator fit test in accordance with the Company's Respiratory Protection Program;

2.5.2.4.5 Have personal monitors and other necessary respiratory equipment to perform the work safely in accordance with the H2S procedure;

2.5.2.4.6 Have been trained and are familiar with proper care and calibration of personal H2S monitors and gas detection instruments;

2.5.2.4.7 Complete a safety review/Job Safety Analysis before starting work; and

2.5.2.4.8 Are held accountable for following the H2s procedure.

2.5.3 *Employees* working at an H2S Location are responsible for:

2.5.3.1 Compliance with WEC's applicable H2S procedure;

2.5.3.2 Being familiar with the content and location of the H2S Contingency Plan;

2.5.3.3 Wearing a personal H2S monitor that is set to alarm at 10 PPM;

2.5.3.4 Carrying a 5-minute escape pack with them at all times;

2.5.3.5 Evacuating to a safe location if the personal H2S monitor alarms when no respiratory protection is being worn;

2.5.3.6 Performing monthly (minimum) respirator inspections;

2.5.3.7 Wearing a self-contained breathing apparatus (SCBA) if H2S concentrations range from 10 PPM to a maximum of 99 PPM. After the equipment has been opened and the H2S concentration has been verified to be below 10 PPM, the breathing equipment is no longer required, except for possession of a 5-minute escape pack by each employee;

Note: *SCBA may only to be used for purposes of isolating and blowing down equipment to reduce working H2S concentrations below 10 PPM. All other work to be performed at H2S locations requires use of Supplied Air Breathing Apparatus (SABA) such as that provided by a mobile breathing air trailer.*

2.5.3.8 Participating in a pre-job Job Safety Analysis with everyone on location to discuss the work plan, the responsibilities of each person and the emergency rescue plan; and

2.5.3.9 Designating at least one person (per two workers), equipped with a SCBA or Supplied Air Breathing Apparatus (SABA) to act as a stand-by person. After equipment has been opened and the atmosphere has been tested and determined to have H2S concentrations below 10 PPM; the stand-by person is no longer required.

2.5.4 Equipment. The following equipment must be provided and used for all potential H2S locations:

2.5.4.1 Wind direction indicator;

2.5.4.2 Personal H2S monitor set to alarm at 10 PPM for each person on site;

2.5.4.3 5-minute escape pack for each per person on site;

2.5.4.4 Full face, air supplied, positive pressure hose line respirator, with 5 minute escape pack attached (one for each person exposed to over 10 PPM H2S), or;

2.5.4.5 A self-contained breathing apparatus (SCBA) (air pack) with a minimum of a 30-minute air supply (one for each person exposed to over 10 PPM H2S)

2.5.4.6 Respirator wearers requiring corrective eyewear will be fitted with spectacle kits according to the respirator manufacturer, at no expense to the employee.

2.5.5 Medical

2.5.5.1 Each employee working on H2S locations that may be required to wear respirators beyond escape packs, must complete a medical evaluation by a physician or licensed health care professional to determine the employee's ability to wear a respirator.

2.5.5.2 Each employee will successfully complete the medical questionnaire, examination, respirator training and fit testing before performing duties on H2S location that may require respirator use and annually thereafter.

2.5.6 Rescue

2.5.6.1 Employees at an H2S location must plan and become familiar with self-escape procedures when working alone, to include being aware of wind direction and obstacles to avoid when exiting the work area.

2.5.6.2 Employees working under the Buddy System shall pre-plan an emergency rescue and/or evacuation procedure prior to commencing work, and arrange for communications with his/her supervisor.

2.6 Driving

Driving a company vehicle or otherwise driving on duty is one of the most hazardous tasks that employees perform. Requirements for each employee who operates a company vehicle, or who operates a rental or personal vehicle for company business, are located in the WEC Safety Manual AND in the WEC Employee Handbook. Detailed procedural requirements in the Safety Manual are entitled '*Commercial Motor Vehicles'* and '*Light Commercial Motor Vehicles',* respectively. A summary of notable requirements is as follows:

2.6.1 Driver Responsibilities

2.6.1.1 Drivers shall conduct a pre-trip check before using any vehicle for the first time, using the WEC vehicle inspection form or equivalent, available from Fleet Management.

2.6.1.2 Drivers shall ensure that state registrations and safety inspections are renewed as required by law.

2.6.1.3 Drivers shall immediately report vehicle incidents, vehicle deficiencies, or driver citations to immediate supervisors within 24 hours.

2.6.1.4 Employees who have vehicles assigned to them are responsible for ensuring that all required maintenance and necessary repair is performed.

2.6.1.5 All drivers and passengers in company vehicles or personal vehicles used for company business must wear seatbelts at all times during operation of the vehicle.

2.6.1.6 If an employee driving a company vehicle becomes fatigued, then another qualified driver should drive. If there is no other qualified driver, then the driver shall not operate the vehicle until he/she has rested properly.

2.6.1.7 Drivers may utilize their assigned company vehicle for personal use only as agreed to and as indicated on their signed vehicle acknowledgement form.

2.6.2 Supervisor Responsibilities

2.6.2.1 Supervisors shall be responsible for ensuring their direct reports comply with all elements of this procedure and all applicable local, state and federal laws.

2.6.2.2 Supervisors shall ensure employees receive safe driver training as required by Company policy.

2.6.2.3 Supervisors are responsible for vehicular incident investigations and any subsequent corrective action.

2.6.3 *Driver Qualifications and Training*

2.6.3.1 The WEC Employee Handbook details conditions under which an employee's authorization to operate a company vehicle or otherwise drive a vehicle on company business may be granted, denied or revoked at any time.

2.6.3.2 Employees authorized to operate a company vehicle must take the company-specified safe driver training within the first 30 days of such

authorization and take safe driver refresher training biennially.

2.6.3.2.1 Employees who operate a company vehicle, rental vehicle, or a personal vehicle for company business for less than 20% of an average work week (normally 8 hours) may be excluded from completing safe driver training at the supervisor's discretion.

2.6.4 Safe Vehicle Operation

2.6.4.1 WEC will provide all necessary insurance on company vehicles; however, if an assigned driver fails to qualify for or loses WEC-provided insurance coverage, that employee shall not be permitted to drive a company vehicle or drive a personal vehicle on behalf of the company.

2.6.4.2 All employees shall operate company vehicles in accordance with federal, state and local laws as well as company rules.

2.6.4.3 Texting is prohibited while operating a company vehicle or while operating a personal vehicle for company business.

2.6.4.4 Each time a driver receives a citation in either a company vehicle or a personal vehicle, the driver shall notify his/her supervisor within 5 business days.

2.6.4.4.1 The supervisor must report this citation to the WEC DOT department within 5 business days.

2.6.4.5 Employees are prohibited from operating a company-sanctioned vehicle while under the influence of intoxicating beverages or illegal drugs.

2.6.4.6 Employees under the influence of over-the-counter or prescribed drugs that could impair a driver's judgment are advised not to operate a company vehicle.

2.6.4.7 Any employee who is ticketed for driving while intoxicated, driving under the influence or any other substance violation while in any vehicle, whether it is a company vehicle or a personal vehicle, must report the incident within twenty-four hours of its occurrence to his or her immediate supervisor, or another member of WEC Management if his or her supervisor is not available.

3. OTHER HEALTH & SAFETY STANDARDS

A summary of additional company health and safety requirements located in the WEC Safety Manual is provided in this section. This is not a complete list of Safety Manual document requirements and those discussed in the following sections are only summarized. Employees and contractors should refer to the WEC Safety Manual and WEC Employee Handbook for full details on the company's health and safety requirements.

3.1 Stop Work Authority

3.1.1 Stop Work Authority (SWA) of each employee is explained in the WEC Employee Handbook, with more details provided in the WEC Safety Manual document entitled *'Stop Work Authority'*. Here it is explained that employees are not subject to disciplinary action for involvement in a safety incident, but will be disciplined for failing to perform their work utilizing approved EHS standards. The following constitute a lack of EHS discipline:

3.1.1.1 Allowing unsafe conditions, by act or failure to act, as is reasonably expected; and

3.1.1.2 Failure to intervene and stop someone else from committing an unsafe act.

3.1.2 Each employee has both the responsibility and authority to stop any task or operation where concerns or questions regarding the control of health, safety or environmental risks exist, or in instances when these potential risks are not clearly understood. No

employee will be reprimanded for their appropriate implementation of SWA.

3.1.3 The SWA procedure is located in the WEC Safety Manual. The procedure requires employees to stop, notify, correct and resume approach for the resolution of a perceived unsafe condition, act, error, omission or lack of understanding that could result in a safety, environmental or property damage incident.

3.2 Short Service Employee

3.2.1 Injury and near miss statistics show that a short-service employee (SSE) is more prone to incidents and injuries at work. This is due to their unfamiliarity with company safety expectations and culture, work situations and environments, and potential hazards and abnormal operating conditions. Additionally, SSEs are not as experienced with safe work procedures as more experienced employees who have longer service and first-hand safety and work experiences in their current job assignment.

3.2.1.1 *Short Service Employee (SSE)* – is a newly placed full time or temporary non-administrative employee or subcontractor with less than six (6) months experience in the assigned job, unless otherwise exempted from SSE designation by the supervisor due to previous experience as discussed below.

3.2.2 The *'Short Service Employee'* procedure located in the WEC Safety Manual is intended to be used to ensure new experienced and inexperienced employees are appropriately supervised, trained and monitored. The SSE procedure provides a system for familiarizing newly assigned employees with their surroundings, and the hazards associated with their assigned task(s).

3.2.3 The SSE procedure applies to all newly hired or transferred non-administrative employees, interns, and

temporary hires working under the direction of a company representative.

3.2.4 The supervisor has primary responsibility for ensuring proper initial safety orientation is completed before ANY new employee starts work and shall use the SSE Form (Form F-S-02-01). Orientation shall be provided when an employee is:

3.2.4.1 First hired; and

3.2.4.2 Appointed a new job assignment which presents new safety hazards.

3.2.5 Initial safety orientation provided by the supervisor will include an overview of:

3.2.5.1 Hazard(s) present in the work place;

3.2.5.2 Policies, procedures, processes and PPE utilized to control these hazards to prevent illnesses, injuries, property damage and/or environmental incidents; and

3.2.5.3 Skills necessary to conduct their assigned jobs safely and efficiently.

3.2.6 The SSE Form is to be used by the supervisor to document the initial safety orientation, designate a new employee into the SSE program, and identify the SSE's assigned mentor. This form must be completed and submitted electronically to the EHS Director before any new non-administrative employee may start work.

3.2.6.1 Newly placed employees with at least one year of verifiable, like experience may be exempted from the mentoring and identification requirements of the SSE program at the discretion of the Supervisor and Area Manager using the SSE Form (F-S-02-01) and submitting this completed form electronically to EHS Director.

3.2.7 Supervisors are responsible for obtaining green colored clothing/PPE items to visually differentiate SSE's. Any field service employees designated as an SSE shall be provided with, and wear while on duty, a

green hardhat whenever working in hardhat required areas. All shop/yard SSEs may wear a standardized green colored armband, green colored safety vest, or other distinguishing green colored identifier approved by the EHS Director.

3.2.8 Mentors responsibilities are detailed in the SSE Procedure. Mentors coach and supervise the SSE's work and are responsible for providing continuing orientation, training and observation of the SSE. The SSE's safety performance will be of highest priority while learning the new job and unfamiliar tasks and workplace procedures. In this role the mentor will be available to the SSE to answer questions, offer guidance and advice, and generally provide the benefit of the mentor's experience, personal support and encouragement on a personal level. In most situations, the mentor will be someone other than the SSE's assigned supervisor or manager.

3.2.8.1 Supervisors and Managers are responsible for ensuring that SSE Mentors are adequately assigned as required by this policy.

3.2.9 At the completion of the six month SSE period, the Supervisor will meet with the SSE and assigned mentor(s) to review the SSE's performance.

3.2.9.1 The Supervisor will use the SSE Graduation (Form F-S-02-02) to document this review. The SSE will be effectively removed from SSE status after the Graduation Form is signed by the Supervisor, Mentor(s) and SSE, and submitted to the EHS Director.

3.3 Employee Hazard ID & Risk Assessment

3.3.1 The *'Employee Hazard ID and Risk Assessment'* procedure located in the WEC Safety Manual provides a means for ensuring that observed hazards are identified and corrected. The procedure calls for employees to use Near Miss, Hazard ID & Observation Cards (Observation Card) to identify

potential hazards, near misses and unsafe conditions that might result in employee exposure to unsafe conditions. By doing this, employees ensure that identified workplace hazards are addressed and mitigated. Regardless of job classification or organizational level, each employee is encouraged to use this procedure to identify observed workplace hazards wherever they are observed.

3.3.2 This procedure **does not**:

3.3.2.1 Eliminate Job Safety Assessment (JSA) requirements;

3.3.2.2 Eliminate the authority and responsibility to implement "Stop Work"; or

3.3.2.3 Replace standard incident reporting procedures.

3.3.3 An employee, who elects to formally report an apparent safety hazard, should complete and submit an Observation Card. The hazard, what actions were taken to address the hazard, and any proposed solutions should be described in detail.

3.3.4 The Observation Card may be handwritten, or filed electronically as specified in the procedure.

3.3.5 Individuals who wish to remain anonymous may omit their name from the observation card and submit it anonymously as directly to an EHS employee.

3.3.6 An employee who wants to discuss an apparent safety hazard, is searching for information on a safety issue, or is reluctant to submit an Observation Card to their supervisor directly, should contact their assigned EHS Coordinator directly.

3.3.7 An employee may encounter a dangerous situation or imminent threat that may result in death, serious injury, prolonged impairment or hospitalization. Under such a circumstance, the employee shall use "Stop Work Authority".

3.3.8 Non Anonymous Card Submittals

3.3.8.1 The completed Observation Card, along with any supporting documents, photos & etc., is submitted to the employee's supervisor.

3.3.8.2 The supervisor shall immediately review the Observation Card, assess the risk and establish a priority for corrective action.

3.3.8.3 If the condition or circumstance is a new or inadequately addressed hazard, the supervisor will evaluate the options and propose an appropriate solution. The supervisor should seek assistance other department personnel or outside expertise in analyzing and evaluating the hazard and developing the corrective action plan.

3.3.8.4 The supervisor must provide the reporting employee (or employee representative) with a response as soon as the evaluation and decision have been made and reviewed, but not more than 10 working days from the date the report was received.

3.3.8.5 The Supervisor submits completed observation cards to EHS. EHS will, in turn, ensure that identified hazards noted on Observation Cards are addressed and mitigated.

3.3.8.6 Employee notifies the EHS Coordinator if a timely response has not been received from the Supervisor.

3.3.9 Anonymous Card Submittals

3.3.9.1 For anonymous submittals submitted directly to EHS, EHS will coordinate to ensure that confirmed hazards noted on Observation Cards are addressed and mitigated.

3.4 Subcontractor Management

3.4.1 The WEC Safety Manual document entitled *'Subcontractor Management'* details requirements for ensuring that work performed by subcontractors at company facilities and customer locations is done

safely and in accordance with Company and, for work at customer locations, customer requirements.

3.4.2 Subcontractors must submit prequalification documentation to the WEC representative responsible for overseeing the project using a Subcontractor Prequalification Process and Scorecard Form included in the *Subcontractor Management* document.

3.4.2.1 This information will, in turn, be submitted to the EHS Director as part of the selection process. The EHS Coordinator and supervisor will coordinate on performing the safety prequalification evaluation.

3.4.3 For work at customer facilities, subcontractors must develop a site-specific safety plan (SSSP) and have a pre-work meeting with the responsible WEC supervisor for whom the work is being performed.

3.4.3.1 Supervisors are encouraged to request assistance from the assigned EHS Coordinator in reviewing this information to assure that they meet the requirements and expectations for site safety and risk control.

3.4.4 Safety Meetings

3.4.4.1 A subcontractor safety meeting will be held with the responsible WEC supervisor before initiating project work. This meeting is to review project requirements for safety and risk control. The subcontractor's safety officer, designated Competent Person(s) or other necessary subcontractor's representatives shall attend the meeting.

3.4.4.2 Subcontractors will be included in any tool box talk safety meetings, job safety analysis (JSA's), jobsite safety inspections, and any pre-job meetings or safety orientations with the responsible WEC supervisor.

3.4.4.3 During these meetings, the subcontractor shall discuss project-specific safety requirements, including a review of various roles and

responsibilities of personnel, an initial overview of project risks, and elements of hazard control/ countermeasures appropriate to potential exposures.

3.5 Emergency Response Plan

3.5.1 The 10th Commandment of Safety is to "*be prepared – know emergency procedures"*. It is imperative the each employee be familiar with the emergency response plan (ERP) for their specific work location.

Note: *This plan may also be referred to as Emergency Action Plan (EAP).*

3.5.2 Emergency Event Absolutes

3.5.2.1 No person shall walk into a pool of flammable liquids or a flammable atmosphere for the purpose of responding to a spill, release, fire or other emergency event in an attempt to protect the company's assets or rescue personnel.

3.5.2.2 Never respond to an emergency without first alerting someone else.

3.5.3 EHS will coordinate with each WEC operating facility to assess the potential for and extent of emergency situations in their areas. This will be used by EHS and facility management to develop a written ERP for each facility. This plan will describes responses for potential emergency event situations applicable to the facility, and will outline procedures for:

3.5.3.1 Responsibilities and duties;

3.5.3.2 Actions and evacuation procedures (if applicable) to take in response to various emergencies.

3.5.3.3 Emergency phone numbers, alarm systems, and internal and external entities to notify;

3.5.3.4 Coordinating and maintaining internal and external communications;

3.5.3.5 Performing emergency drills and reviewing and evaluating response procedures after drills and after emergencies;

3.5.4 This plan must be reviewed periodically in safety meetings and coordinated with facility employees, the local fire department, the local hospital; and other emergency response groups as necessary.

3.6 First Aid & Medical Assistance

3.6.1 WEC does not want any employee attempting a rescue without training or proper equipment and backup. Never attempt a rescue by walking through flammable liquids or flammable/toxic gases to get to a victim. Never attempt to rescue without proper respiratory equipment. Be extremely cautious when attempting to rescue a victim from an area filled with smoke, chemical vapors, gas or fumes. Before entering such an area, don a self-contained breathing apparatus, if applicable, or wait for arrival of an emergency rescue team if no respiratory equipment is available, Remain close to the ground (crawl) if entering a smoke filled room.

3.6.2 The WEC Safety Manual document entitled *'First Aid & Medical Assistance'* describes the company's program for:

3.6.2.1 Providing emergency medical care and First Aid treatment for employees;

3.6.2.2 Ensuring the adequacy and availability of First Aid supplies and equipment;

3.6.2.3 Providing First Aid and Cardiopulmonary Resuscitation (CPR) to employees through training and certification of co-workers in First Aid/CPR; and

3.6.2.4 Providing guidance in complying with the First Aid and medical care requirements of the Occupational Safety and Health Administration (OSHA).

3.6.3 Requiring Employees to Render First Aid/CPR

3.6.3.1 It is noted in the Safety Manual procedure entitled *'Bloodborne Pathogens'* that WEC can require an employee to render First Aid or CPR:

3.6.3.1.1 If an employee's designated job duty includes the performance of first aid; OR

3.6.3.1.2 The employee is participating in a special emergency medical response organization; OR

3.6.3.1.3 The employee voluntarily takes on First Aid responsibilities as a part of his/her job description.

Note: *Under no circumstances will any employee be forced to perform First Aid and/or CPR against their personal judgment, BUT they must ensure that the appropriate person(s) are notified to render aid.*

3.6.4 Employees and contractors are referred to Safety Manual document for full details on the company's First Aid & Medical Assistance program.

3.7 Bloodborne Pathogens

3.7.1 The WEC Safety Manual document entitled *'Bloodborne Pathogens'* describes the WEC program for eliminating or minimizing infections from Bloodborne Pathogens (BBP) in the workplace, including Human Immunodeficiency Virus (HIV), Hepatitis B Virus (HBV) and Hepatitis C Virus (HCV).

3.7.2 Determining Exposure Risk by Job Classification. An employee's occupational exposure risk is the extent to which he or she may be reasonably expected to be involved in an exposure incident while performing his or her regular duties. The company's BBP program identifies categories of employees based upon occupational exposure risk.

3.7.2.1 Category 1 personnel include contract nurses and physicians who job duties routinely involve exposure to blood or body fluids.

3.7.2.2 Duties of Category 2 employees normally do not involve exposure to blood or body fluids, but they may be required to perform unplanned tasks consistent with a Category 1. Category 2

employees include those who are required to render first aid at a specific job site or location, and mechanics/technicians assigned to work on equipment in landfills.

3.7.2.3 Category 3 employees are not required to render first aid as a part of their job duties. Any first aid they may render is only as a collateral duty responding solely to injuries resulting from workplace accidents. Examples of Category 3 employees include administrative staff, shop technicians, engineers, supervisors and managers

3.7.3 Rendering First Aid. The company's BBP program describes situations under which employees may render first aid either as a requirement or voluntarily as part of a 'Good Samaritan Act'.

3.7.4 BBP Exposure Incident. A BBP Exposure Incident is an event that occurs during the performance of the employee's regular job duties and in which blood and OPIM come in contact with an employee's eyes, mouth, nose, broken skin or other mucous membrane. These incidents can also include needle sticks, human bites, cuts or abrasions. BBP Exposure Incidents and any incident involving the presence of blood or other potentially infectious materials (OPIM) must be immediately reported to the immediate supervisor in accordance with WEC incident reporting procedures.

3.7.5 Preventing Exposure. The WEC BBP program details required safety practices for minimizing or preventing exposure to BBP in the workplace including:

3.7.5.1 Following Universal Precautions of treating all human blood and certain human body fluids as if they are infectious for BBP;

3.7.5.2 Using appropriate PPE;

3.7.5.3 Obtaining the HBV Vaccine;

3.7.5.4 Cleaning, disinfecting, sterilizing non-disposable equipment;

3.7.5.5 Washing hands after a potential exposure situation; and

3.7.5.6 Disposing of regulated medical waste appropriately.

3.7.6 Hepatitis B Vaccinations (HBV). WEC will offer the Hepatitis B vaccination (HBV) as detailed in the BBP program document at no cost to:

3.7.6.1 Designated first aid responders (Category 2 employee);

3.7.6.2 Unvaccinated first aid providers who have been in an exposure incident while rendering assistance to an injured employee; and

3.7.6.3 Employees designated Category 2 due to an exposure risk exists as determined by EHS and the manager/supervisor.

3.7.7 Training. WEC wants all employees to have the skills necessary to handle BBP emergency situations whenever these situations occur and the employee chooses to respond to them. Accordingly, training will be provided on the following as described in the BBP program document to affected employees based upon job duties. Training will cover:

3.7.7.1 Contents and location for employees to access this BBP exposure control plan;

3.7.7.2 Epidemiology and symptoms of bloodborne infectious diseases;

3.7.7.3 Transmission routes of bloodborne diseases;

3.7.7.4 HBV vaccine;

3.7.7.5 Recognition of exposure situations;

3.7.7.6 Selection and use of Personal Protective Equipment (PPE);

3.7.7.7 Procedures to be followed in the event of an exposure;

3.7.7.8 Emergency procedures and contacts;

3.7.7.9 Post-exposure evaluation and follow-up program; and

3.7.7.10 Explanation of signs, labels and color-coding.

3.7.8 Employees and contractors are referred to Safety Manual document for full details on the company's BBP program.

3.8 Access to Employee Exposure and Medical Records

3.8.1 Certain employees exposed to potential health hazards on the job shall be given periodic physical examinations. Health hazards shall be determined by managers with the assistance of the EHS, Risk Management, and Human Resources.

3.8.2 The scope of the examinations shall be established based upon actual workplace exposures. Examples include asbestos, benzene, exposure, paint and sandblast, hydrogen sulfide, and noise exposure.

3.8.3 Employee participation in these programs is to be based on appropriate exposure monitoring and regulatory requirements.

3.8.4 Individual personnel monitoring and workplace industrial hygiene exposure records will be maintained by the company for a minimum of 30 years as required by OSHA.

3.8.5 WEC has implemented for all company personnel the OSHA standard described as 29CFR §1910.1020 which permits direct access to these records by employees exposed to hazardous materials.

3.8.6 Employees are referred to the Safety Manual document *entitled 'Access to Employee Exposure and Medical Records'* for details regarding the procedure for requesting their medical records.

3.9 Hazard Communication (HazCom)

3.9.1 Products used in our workplace may contain substances which are toxic and/or hazardous. OSHA's HazCom standard requires that each product container contain the appropriate labels and warnings that shall be in English. Other languages may be added as appropriate.

3.9.2 Any hazardous or toxic chemical in the workplace, to which an employee may be exposed, must be listed

on the chemical inventory and a Safety Data Sheet (SDS) for the product readily available.

3.9.3 Supervisors are responsible for ensuring employees receive instruction at the time of initial assignment or whenever a new toxic or hazardous chemical product is introduced into the work area that includes review of pertinent hazard information on the SDS.

3.9.4 Employees are required to follow SDS recommendations when working with chemical products.

3.9.5 Hazardous chemicals to which contractor's employees may be exposed while working on WEC property, will have the appropriate SDS information supplied to the contractor.

3.9.6 Where contractors bring their own hazardous and toxic chemicals on our sites, they will be required to be labeled in accordance OSHA HazCom requirements and a SDS for each product available for review.

3.9.7 Contractors are responsible for the removal and proper disposal of unused chemicals they have brought on site unless otherwise agreed by WEC.

3.10 Fire Protection

3.10.1 The company's fire protection standard and requirements, entitled *'Fire Protection'*, can be found in the WEC Safety Manual.

3.10.2 Employees are provided the training necessary to be able to put out small fires in their beginning stages (i.e., incipient stage). Fire protection equipment and associated training is provided to allow employees to protect themselves and in some cases company property in the event of a fire.

3.10.3 Fires are classified by the types of fuel they burn.

3.10.3.1 Class A Fires consist of ordinary combustibles such as wood, paper, trash or anything else that leaves an ash. Water works best to extinguish a Class A fire.

3.10.3.2 Class B Fires are fueled by flammable or combustible liquids, which include oil, gasoline, and other similar materials. Smothering effects which deplete the oxygen supply work best to extinguish Class B fires.

3.10.3.3 Class C Fires are energized electrical fires. Always de-energize the circuit then use a non-conductive extinguishing agent such as carbon dioxide.

3.10.3.4 Class D Fires are combustible metal fires. Magnesium and Titanium are the most common types of metal fires. Once a metal ignites do not use water in an attempt to extinguish it. Only use a Dry Powder extinguishing agent. Dry powder agents work by smothering and heat absorption.

3.10.3.5 Class K Fires are fires that involve cooking oils, grease or animal fat and can be extinguished using Purple K, the typical agent found in kitchen or galley extinguishers.

3.10.4 WEC maintains fire extinguishers designed for the types of fires expected in the workplace (Class A, Class B and Class C). It is important to use the correct extinguisher for the type of fuel because use of an incorrect agent can allow the fire to re-ignite after seemingly being extinguished successfully. There are two basic types of fire extinguisher the company maintains

3.10.4.1 Carbon Dioxide fire extinguishers extinguish fire by taking away the oxygen element of the fire triangle and also by removing the heat with a very cold discharge. Carbon dioxide can be used on Class B & C fires and are usually ineffective on Class A fires.

3.10.4.2 Dry Chemical fire extinguishers extinguish the fire primarily by interrupting the chemical reaction of the fire triangle. Today's most widely used type of fire extinguisher is the multipurpose dry chemical

that is effective on Class A, B, and C fires. This agent also works by creating a barrier between the oxygen element and the fuel element on Class A fires.

3.10.5 Fire extinguishers must be properly maintained and inspected on a monthly and yearly basis as specified in the Safety Manual document entitled “Fire Protection”.

3.10.6 General fire extinguisher use guidelines are as follows:

3.10.6.1 Do not use a fire extinguisher unless you are trained to do so.

3.10.6.2 Never attempt to extinguish a fire that is beyond the incipient stage.

3.10.6.3 Use the PASS system when operating an extinguisher:

3.10.6.3.1 **P**ull the pin on the extinguisher (on the cartridge extinguisher also tilt the extinguisher away from you as you depress the cartridge);

3.10.6.3.2 **A**im at the base of fire from a suitable distance while approaching from the upwind side;

3.10.6.3.3 **S**queeze the handle; and

3.10.6.3.4 **S**weep the nozzle from side to side.

3.11 Fire And Safe Work Permit

3.11.1 The document entitled ‘Performing Hot Work Operations’, located in the WEC Safety Manual, establishes proper safety precautions to be taken when any work within a classified area requires an open flame, welding, burning, grinding, opening energized electrical junction boxes or use of spark producing devices. This standard is for use at WEC facilities and when working at a customer location and not working under a client’s work permit system.

3.11.1.1 Normal preventative maintenance to a unit in the field will not require a Fire and Safe Work Permit unless it is required by the client or your supervisor. A *‘Fire and Safe Work Permit’* is

required for the operation of equipment, such as, cranes or winch trucks that pose a potential hazard due to overhead power lines. Operations involving approved electrical bucket trucks are excluded. The spacing requirements specified within the classified area definition in this standard do not apply to equipment design or installation.

3.11.2 Definitions

3.11.2.1 Classified Areas. For purposes of this standard, classified areas shall consist of the following:

3.11.2.1.1 Offshore platforms except in designated areas;

3.11.2.1.2 Areas within gas plant boundaries except in designated areas;

3.11.2.1.3 Areas within 100 feet of hydrocarbon containing equipment/facility such as vessels, tanks, pipeline connections and valves, or wellheads if an open flame is involved;,

3.11.2.1.4 Areas within 20 feet of hydrocarbon containing equipment/facility when the use of portable spark producing devices (including non-DOT approved vehicles), or the opening of energized electrical junction boxes is required;

3.11.2.1.5 Areas within 20 feet of tanks or vehicles that transport hydrocarbons such as vacuum trucks or fuel tanks, or any other area deemed necessary by supervision; and

3.11.2.1.6 Areas within 50 feet of overhead power lines when performing overhead operations.

3.11.2.2 Fire Watch. The person(s) and associated fire protection equipment assigned to standby during welding, cutting or open flame conditions; this will be the only function of this assignment.

3.11.3 Responsibilities

3.11.3.1 The Permit Initiator is responsible for:

3.11.3.1.1 Completing the Hot Work Permit including details of the job and how the Initiator can be contacted;

3.11.3.1.2 Coordinating the job with the WEC Supervisor or designated alternate in charge of the facility; and

3.11.3.1.3 Signing the permit.

3.11.3.2 Operating Personnel are responsible for:

3.11.3.2.1 Completing necessary gas tests for explosiveness, toxicity or other hazardous conditions;

3.11.3.2.2 Inspecting and placing fire extinguishers, fresh air equipment and other safety equipment;

3.11.3.2.3 Understanding the conditions of the Fire and Safe Work Permit and signing the permit before starting the job;

3.11.3.2.4 Re-inspecting and gas checking the work area as necessary;

3.11.3.2.5 Warning other operating personnel in the vicinity not to perform any operation that is likely to change the conditions sufficiently to void the permit;

3.11.3.2.6 Preventing other operations that may conflict with the permitted work;

3.11.3.2.7 Instructing all personnel concerned to Stop Work if a change occurs that can create an unsafe condition; and

3.11.3.2.8 Inspecting the work area after the work is complete.

3.11.3.3 The WEC Supervisor is responsible for:

3.11.3.3.1 The safety of personnel and equipment under his/her supervision;

3.11.3.3.2 Ensuring that all elements of the permit procedure are completed; and

3.11.3.3.3 Signing the permit.

3.11.3.4 The Fire Watch is responsible for no duties other than:

3.11.3.4.1 Use of fire equipment as necessary;

3.11.3.4.2 Continuously monitoring the area during and thirty (30) minutes after hot work (open flame, grinding, cutting, or welding);

3.11.3.4.3 Stopping the hot work if sparks, flame or heat is projected outside the permitted area or when flammable gases are suspected;

3.11.3.4.4 Alerting personnel entering the permitted area of hazards such as, arc-flashes, grinding, cutting, or overhead hazards;

3.11.3.5 Contractors are responsible for following the WEC Fire and Safe Work permit program requirements.

3.12 Personal Protective Equipment (PPE)

3.12.1 The purpose of PPE is to reduce employee exposure to hazards when engineering and administrative controls are not feasible or effective to reduce these to acceptable levels.

3.12.2 Hazards addressed by PPE include physical, electrical, heat, chemicals, biohazards, and airborne particulate matter.

3.12.3 PPE has the limitation that it does not eliminate the hazard. Rather it provides a protective barrier between the employee and the hazard. Because of this limitation, the decision by supervisors and managers to rely on PPE to protect employees must follow careful consideration of the practicality of implementing the more effective hazard control options of elimination, substitution, engineering controls & administrative controls.

3.12.4 The *'Personal Protective Equipment'* document located in the WEC Safety Manual is a written program describing policy for minimizing exposure to hazards by ensuring that PPE is identified for use in the workplace.

3.12.5 To meet OSHA for selecting and using PPE, supervisors must perform PPE Hazard Assessments that entails a review all work procedures to determine PPE needs.

3.12.6 Supervisors are to use PPE Hazard Assessments to identify PPE needs for their employees, and ensure that adequate supplies of this PPE are maintained and kept readily available for each task.

3.12.7 Supervisors are encouraged to post signs to designate PPE-required areas.

3.12.8 Employees must wear and properly maintain PPE in accordance with company requirements for use of PPE in the workplace, as contained in the Safety Manual document entitled "PPE".

3.13 Respiratory Protection

3.13.1 Respirators are a type of PPE designed to protect employees from harmful airborne contaminants or low oxygen levels. OSHA requirements in §1910.134(c) specify that a respiratory protection program be maintained when employees are required to use a respirator to protect against these hazards. The company's respiratory protection program, entitled *'Respiratory Protection',* is located in the WEC Safety Manual. This program is intended to ensure proper respirator selection, medical clearance of employees who wear respirators, fit testing, training, use, and maintenance practices.

3.13.2 Respiratory protection shall be provided to WEC employees on the basis of hazard exposure. The WEC Respirator Protection program details the process for evaluating respiratory hazards and selecting respirators based upon workplace and user factors. The respirator type or class is selected by comparing the employee's exposure to the occupational exposure limit and determining the minimum necessary respirator assigned protection factor.

3.13.3 Medical Evaluation. Employees must be medically cleared to wear respirators. All respirators generally place a burden on the employee. Some restrict breathing, some can cause claustrophobia and others such as self-contained breathing apparatuses are heavy. Each of these conditions can adversely affect the health of some employees who wear respirators. Additionally, some employees may have medical conditions such that they are not medically fit to wear a respirator. The WEC Respiratory Protection program includes provisions for a physician or other licensed health care professional to medically evaluate employees to verify that they can safely wear respirators under anticipated work conditions.

3.13.4 Fit Testing. Respirators that rely on a mask-to-face seal need to be annually checked with either qualitative or quantitative methods to determine whether the mask provides an acceptable fit. Employees are required to regularly maintain and clean respirators according to the manufacturer's recommendations to ensure they function properly and do not pose a hazard. In general, respirators should be inspected for proper function prior to each use and cleaned as often as necessary to prevent the occurrence of unsanitary conditions.

3.13.5 Training. Under the WEC Respiratory Protection program, employees who are required to wear respirators will receive training in the respiratory hazards to which they are potentially exposed during routine and emergency situations, and instruction in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance;

3.13.6 General Respiratory Protection Requirements

3.13.6.1 Contact lenses shall not be worn with respirators.

3.13.6.2 All personnel using respirators must be properly trained in:

3.13.6.2.1 The respiratory hazards to which they are potentially exposed during routine and emergency situations; and

3.13.6.2.2 Proper selection, use and limitations of respirators.

3.13.6.3 Cartridges on air purifying respirators have a limited useful service life must be regularly replaced according to the manufacturer's recommendations

3.13.6.4 Respiratory protection must not be obstructed by facial hair between the skin-to-mask seal.

3.13.6.5 Where practical, respirators will be assigned to individual workers for their exclusive use.

3.13.6.6 Respirators must be stored in a convenient, clean and sanitary location and protected against dust, sunlight, heat, extreme cold, excessive moisture or damaging chemicals.

3.13.6.7 Respirators used solely for emergency use must be thoroughly inspected monthly and after each use and these inspections must be documented.

3.14 Hearing Conservation

3.14.1 The Safety Manual document entitled *'Noise Awareness/Hearing Conservation'* describes the company's hearing conservation program for preventing on-the-job noise induced hearing loss. Included in this document are requirements for implementing controls to reduce noise exposure, wearing hearing protection, conducting noise surveys, and performing employee audiometric testing.

3.14.2 Hearing Conservation Program. The WEC Safety Manual program for *Noise Awareness/Hearing Conservation* prescribes for the implementation of a hearing conservation program for employees with documented on-the-job noise exposures exceeding the action level 8-hour time-weighted average (TWA) of 85 decibels. This is the noise exposure level at which OSHA requires precautionary actions to prevent

hearing loss. WEC management will determine what portions of this program to implement for instances where on-the-job noise exposures do not exceed this 85 decibel TWA action level. This program includes the following elements:

3.14.2.1 Engineering Controls to Reduce Noise Exposure. It is WEC policy that administrative and engineering controls be used where practicable to reduce noise exposures below OSHA-prescribed action levels. If controls do not reduce sound levels below the action level then:

3.14.2.1.1 Approved hearing protection supplied by WEC must be anyone in areas where noise levels are determined to trigger an action level.

3.14.2.1.2 Supervisors post "Hearing Protection Required" signs to warn employees and visitors;

3.14.2.1.3 EHS arranges for periodic monitoring of workplace noise levels to confirm areas designated as "Hearing Protection Required".

3.14.2.2 Mandatory Hearing Protection Requirement.

3.14.2.2.1 Each employee must wear hearing protection whenever noise exposures exist at the action level AND when working near an operating compressor, generator, Dyno, or other operating equipment/machinery producing similar high noise.

3.14.2.2.2 Supervisors provide hearing protection devices at no cost to employees.

3.14.2.2.3 Employees ensure effective noise reduction by fitting and sealing the plug or muff to their ear properly when in high noise areas.

3.14.2.3 Noise Surveys. Managers/Supervisors request noise surveys where non-routine or maintenance operations are suspected to generate noise levels above 85 decibels. EHS arranges for periodic noise surveys at its discretion and as requested by Supervisors. Noise surveys will note whether employee exposure may equal or exceed an 8-hour TWA sound level of 85 decibels.:

3.14.2.4 Audiometric Testing. Employees working within an area with greater than 85 dB TWA will have must have a baseline hearing test followed by annual audiometric testing to assess hearing loss in accordance with OSHA standards.

3.14.2.5 Training. Noise awareness training will be provided by EHS before an employee's initial assignment to elevated workplace noise exposures and annually thereafter. Initial awareness training will also be provided to all employee's and new hires.

3.15 Heat Illness Prevention

3.15.1 Heat is the number one weather related killer in the United States. Statistical data from the National Weather Service shows that heat causes more fatalities per year than floods, lightning, tornadoes and hurricanes combined. The *'Heat Illness Prevention'* procedure, located in the WEC Safety Manual, establishes minimum requirements for proper heat stress management

3.15.2 The procedure includes a heat index chart prepared by the National Weather Service (NWS) and requires employees and supervisors to implement the following measures when the NWS Heat Index (HI) is ≥ 90ºF:

3.15.2.1 Address Heat Hazards in Job Safety Analysis (JSA) – employees and supervisors monitor local weather conditions to identify the anticipated HI and complete a JSA before starting work that

notes the current and anticipated HI and specifies stress prevention measures that will be taken.

3.15.2.2 Monitor Water Intake – Ensure an adequate supply of cool water is available, follow water intake requirements specified in the procedure, and use a Urine Color Guide included in the procedure to assess for proper hydration.

3.15.2.3 Periodic Supervisor Contact – Supervisor or person-in-charge regularly monitors their work group(s) for signs of heat stress among their work groups.

3.15.2.4 Breaks – Follow proper work rest cycles specified in the *Protective Measures to Take at Each Risk Level* section of the procedure.

3.15.2.5 Cooling Area – use a cooling area during breaks. The cooling area should be a significant enough temperature difference to provide relief from the heat. The procedure includes cooling area recommendations.

3.15.2.6 Job Scheduling and Rotation – the procedure includes several recommended methods.

3.16 Fatigue Management

3.16.1 The 'Fatigue Management' document, located in the WEC Safety Manual, details provisions for ensuring employees recognize effects of fatigue, and establishes guidelines to reduce fatigue in our workplace.

3.16.2 WEC Fatigue Management Principles.

3.16.2.1 Employees must be in a fit state to undertake work;

3.16.2.2 Employees must be fit to complete work;

3.16.2.3 Employees must take minimum periods of rest to safely perform their work;

3.16.2.4 Employees must be able to recognize fatigue symptoms.

3.16.3 WEC requires that supervisors and managers implement these fatigue management principles by:

3.16.3.1 Appropriately planning work tasks, including driving, vehicle and equipment maintenance, loading and unloading and other job related duties and processes;

3.16.3.2 Obtaining regular medical checkups and monitoring one's own health issues as required;

3.16.3.3 Providing/securing appropriate sleeping accommodations as necessary; and

3.16.4 Attending ongoing fatigue management training provided by EHS.

3.16.5 Management Responsibilities. Management accepts responsibility for the implementation of the WEC fatigue management policy and is responsible for the implementation and maintenance of this program for their site and ensuring all assets are made available for compliance with the program.

3.16.6 Employee Responsibilities.

3.16.6.1 Employees must present in a fit state free from alcohol and drugs;

3.16.6.2 Employees must not chronically use over-the-counter or prescription drugs to increase mental alertness;

3.16.6.3 Employees are prohibited from taking any substance known to increase fatigue in that employee. This includes fatigue that sets in after the effects of the drug wears off;

3.16.6.4 Employees must notify supervisors of any prescription medication being taken.

3.16.6.5 Workers shall report tiredness/fatigue to supervision so that supervisor may take appropriate action to assist the worker;

3.16.6.6 Employees must report fatigue/tiredness and lack of mental acuity to their supervisor; and

3.16.6.7 Employees need to be well rested and fit for duty prior to starting work.

3.16.7 Work Hour Limitations.

3.16.7.1 Employees, including drivers, should take work breaks as necessary to avoid excessive fatigue, including lunch breaks and regularly scheduled break times. The Company has set the work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and to increase mental fitness. Every employee shall have necessary work breaks in order to avoid fatigue. Additionally, DOT drivers are required to comply with applicable DOT mandated rest periods/breaks. The following shall be a minimum for non-DOT workers:

3.16.7.1.1 15 Minutes each 2 hours;

3.16.7.1.2 30 Minutes after 5 Hours; and

3.16.7.1.3 30 Minutes after 10 Hours.

3.16.7.2 Work shall be scheduled such that employees do not work more than:

3.16.7.2.1 14 hours per day; and

3.16.7.2.2 24 days continuous.

3.16.8 Equipment & Evaluation

3.16.8.1 WEC will provide equipment such as anti-fatigue mats for standing, lift assist devices for repetitive lifting and other ergonomic devices as deemed appropriate, including chairs for workers to sit periodically. The Company will provide periodic rest breaks for personnel. The Company will also periodically evaluate and improve work tasks to control fatigue.

3.17 Compressed Gas

3.17.1 Company requirements in the WEC Safety Manual for compressed gas and fuel gas equipment are entitled *'Oxygen and Fuel Gas Supply Equipment'*. This document includes the following basic precautions that must be taken when handling and storing compressed gas cylinders:

3.17.1.1 Store and transport all cylinders in an upright position according to the appropriate regulatory

requirements. Do not store near sources of heat or combustible materials.

3.17.1.2 Secure cylinders by chain or other appropriate methods to prevent them from moving or falling. Do not drop or handle roughly.

3.17.1.3 Place protective caps on all cylinders except those in use.

3.17.1.4 Do not stand in the line of fire when opening valves.

3.17.1.5 Check hydrostatic test dates on all cylinders. Out-of-date cylinders must be retested or replaced.

3.17.1.6 Do not use cylinders as rollers or supports, even if they are considered empty.

3.17.1.7 Store oxygen and acetylene gas cylinders in separate areas, or separated by a 1 hour fire wall (for example, a 3/8-inch steel thickness or concrete wall) or separated by 25 feet.

3.17.1.8 Mark empty cylinders empty and full cylinder full.

3.17.1.9 Do not use oil and grease on valves or regulators.

3.17.1.10 Never apply compressed air to yourself or others.

3.17.1.11 Additional safeguards may be needed for cylinders containing certain gases other than oxygen and acetylene.

3.18 Heavy Mobile Equipment Loading & Unloading

3.18.1 The WEC Safety Manual procedure entitled *'Heavy Mobile Equipment Loading & Unloading'* pertains to the loading and unloading of equipment being hauled by 3rd party, as well as company vehicular transports of heavy mobile equipment.

3.18.2 For 3rd party transports, employees are to request that the transporter perform the mobile equipment loading/unloading operation. If the transporter refuses to load/unload from the trailer, then the *Heavy Mobile Equipment Loading & Unloading* document specifies steps to follow to ensure the operation is performed by a supervisor-designated employee who is

knowledgeable in how to safely operate and load/unload equipment.

3.18.3 Detailed operating requirements to ensure this operation is performed safely are included in this document.

3.18.4 For company vehicular equipment transports, the Safety Manual document includes procedures for:

3.18.4.1 Using transport-rated tie-down chains and approved tie-down points to secure the equipment to the frame of the trailer;

3.18.4.2 Calculating the Aggregate Working Load Limit (AWLL) when sizing chains and binders;

3.18.4.3 Verifying that the haul meets the legal height limit for trailer loads; and

3.18.4.4 Making a final walk-around inspection to verify that the load is properly secured.

3.19 Cranes, Hoists, Monorails & Rigging

3.19.1 The WEC Safety Manual procedure entitled *'Cranes, Hoists, Monorails & Rigging'* contains detailed requirements to ensure that only qualified designated employees operate a crane, and that all cranes are properly installed, inspected, maintained, and in good working condition. This document also includes procedures for safe operations and training requirements regarding cranes and rigging equipment. The procedure applies to all types of cranes including

3.19.1.1 Overhead & Gantry Cranes – including gantry cranes, including semigantry, cantilever gantry, wall cranes, storage bridge cranes, and others having the same fundamental characteristics. These cranes all have trolleys and similar travel characteristics.

3.19.1.2 Mobile Cranes - crawler cranes, locomotive cranes, wheel mounted cranes of both truck and self-propelled wheel type, and any variations thereof which have the same fundamental characteristics and are basically powered by

internal combustion engines or electric motors and which utilize drums and ropes.

3.19.2 General Requirements for All Cranes

This section includes a limited summary of general requirements applicable to all cranes. Employees and supervisors should reference the *Cranes, Hoists, Monorails & Rigging* procedure for full details.

3.19.2.1 Supervisors are responsible for ensuring that equipment and employees are in compliance with the *Cranes, Hoists, Monorails & Rigging* procedure.

3.19.2.2 Needed repairs identified through inspection are to be brought to the attention of the supervisor, and accomplished as soon as possible. Any device unsuitable for safe use should be clearly marked/labeled “DO NOT USE” or “OUT OF ORDER” until it is repaired. The device should be “locked out” according to the s *Lockout/Tagout Energy Isolation* procedure to prevent use until repairs.

3.19.2.3 Only a Designated Person may operate a crane and must comply with the manufacturer’s load specifications and operating speed limitations applicable to the operation of any crane.

3.19.2.4 As a Designated Person, the operator is responsible for knowing the weight of the object being lifted and the Load Rating of the crane being used and must never load a crane beyond its rating unless being done for test purposes.

3.19.2.5 The operator must ensure that the rated load capacity of a crane's bridge, individual hoist, or any sling or fitting is not exceeded.

3.19.2.6 Any crane or hoist suspected of having been overloaded must be removed from service by locking open and tagging the main disconnect switch, and clearly marked/labeled “DO NOT

USE" or "OUT OF ORDER" until it is inspected and, if needed, repaired.

3.19.2.7 Repair, initial inspection and testing of a crane suspected of being overloaded must be performed by independent, contract Qualified Individuals.

3.19.2.8 Prior to initial use all new, altered cranes, or repaired cranes must be inspected and tested by a contracted Qualified Individual. The new or altered crane may be put into service only after determined by the Qualified Individual that it is in safe operating condition.

3.19.2.9 Where manufacturer's specifications are not available, the limitations assigned to a crane must be determined by a qualified engineer competent in this field. Such determinations must be appropriately documented and kept readily available for inspection. Attachments used with cranes must not exceed the capacity, rating, or scope recommended by the manufacturer.

3.19.2.10 The use and operation of customer-owned cranes, hoists and rigging equipment by a Designated Person requires advance permission from the designated client representative.

3.19.3 Rigging Requirements

3.19.3.1 Rigging is the process of using ropes, chains, and mechanical devices to lift and move heavy loads with cranes or powered industrial trucks. Supervisors are responsible for ensuring that their employees meet rigging requirements found in the *'Cranes, Hoists, Monorails & Rigging'* procedure, including sections on moving a load and inspecting & marking rigging using the monthly *Overhead and Sling Inspection Monthly Checklist* that is located in the Safety Manual.

3.20 Powered Industrial Trucks

3.20.1 Powered industrial trucks (PITs) are commonly called forklifts, pallet trucks, rider trucks, fork trucks or lift trucks. They are used to carry, push, pull, lift, stack or tier materials. PITs can either be ridden by the operator or controlled by a walking operator. There are many types of PITs and each type presents different operating hazards. Workplace type and conditions are factors in hazards commonly associated with PITS. Many workers can be injured when (a) lift trucks are inadvertently driven off loading docks; (b) lifts fall between docks and an unsecured trailer; (c) they are struck by a lift truck; or (d) they fall while on elevated pallets and tines.

3.20.2 PIT Training Requirements. OSHA requirements in §1910.178(l)(2)(ii) require operators to have received training that consists formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace. To meet this requirement, the company requires operators to become certified by completing formal instruction offered by EHS, followed by practical training and a hands-on evaluation provided by a qualified evaluator using the *PIT Evaluation Form* located in the WEC Safety Manual. Certified PIT operators will be issued a PIT training certificate card by EHS.

3.20.2.1 Supervisors are responsible for ensuring that PITs are operated only by designated employees who meet these training and certification requirements.

3.20.2.2 A forklift operator's PIT certification card issued by a previous employer will not be accepted.

3.20.2.3 If involved in a PIT incident while operating a forklift, the operator will be required to repeat PIT training before authorized to operate again.

3.20.2.4 An operator in two (2) PIT-related incidents in one calendar year will lose operating privileges for 6 months.

3.20.3 PIT Maintenance Requirements (1910.178(q)(2))

3.20.3.1 Any PIT not in safe operating condition must be removed from service. All repairs shall be made by authorized personnel,

3.20.3.2 Industrial trucks must be inspected before each use and at least daily. No PIT can be placed in service if any condition is found that may adversely affect the safety of the vehicle. Defects shall be immediately reported and corrected.

3.20.3.3 Industrial trucks shall be kept clean and free of lint, excess oil, or grease.

3.20.3.4 Repairs to the fuel and ignition systems of which involve fire hazards must be conducted only in locations designated for such repairs.

3.20.3.5 Trucks in need of repairs to the electrical system must have the battery disconnected prior to such repairs.

3.20.3.6 All parts of any such industrial truck requiring replacement must be replaced only by parts equivalent as to safety with those used in the original design.

3.20.3.7 PITs may not be altered so that the relative positions of the various parts are different from what they were when originally received from the manufacturer, nor can they be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts, except. The only exception is conversion of gas fueled trucks to liquefied petroleum gas fuel provided this is done in accordance with §1918.178(q)(12).

3.20.3.8 Additional counterweighting of fork trucks shall not be done unless approved by the truck manufacturer.

3.20.4 Forklift Operations. The Safety Manual document entitled *'Forklift Operations'* contains detailed requirements pertaining to operator certification, operation, maintenance and inspection of forklifts used in the workplace.

3.21 Aerial Lifts

3.21.1 An aerial lift is any vehicle mounted device used to elevate personnel, including extendable boom platforms; aerial ladders; articulating (jointed) boom platforms; vertical towers; or any combination of the above.

3.21.2 The *'Aerial Lift'* procedure, located in the WEC Safety Manual, details requirements applicable to aerial lifts used in the workplace.

3.21.3 Training Requirements. Only trained and authorized persons designated by the supervisor may operate an aerial lift. Training will include topics specified in the Aerial Lifts procedure.

3.21.4 Supervisor Requirements

3.21.4.1 Designate authorized personnel who have been trained in proper operation of an aerial lift.

3.21.4.2 Ensure that all aerial devices are properly operated by authorized personnel in full compliance with the *Aerial Lift* procedure.

3.21.4.3 Ensure employees comply with the *company Fall Protection* procedure when working on an elevated surface (> 4 ft.) using an aerial lift.

3.21.4.4 Obtain written approval from the manufacturer before any aerial lift is "field modified" for uses other than those intended by the manufacturer.

3.21.5 Authorized Aerial Lift Operator Requirements

3.21.5.1 Follow all aspects of the *Aerial Lift* procedure and be authorized by the supervisor to operate an aerial lift.

3.21.5.2 Conduct pre-start inspections each day prior to use to verify that the equipment and all its components are in proper working condition. Inspections must be made at the beginning of each shift during which the equipment is used.

3.21.5.3 Be familiar with boom and basket load limits specified by the manufacturer and ensure these are never exceeded.

3.21.5.4 Only back up the aerial lift when an observer (spotter) signals that it is safe to do so for any aerial lifts that is not equipped with a working back-up alarm that can be clearly heard above the surrounding noise level.

3.21.5.5 Stabilize the work zone:

3.21.5.5.1 Set outriggers on pads or on a level, solid surface;

3.21.5.5.2 Set brakes when outriggers are used;

3.21.5.5.3 Use wheel chocks on sloped surfaces when it is safe to do so; and

3.21.5.5.4 Set up work zone warnings, such as cones and signage to warn others.

3.21.5.6 Do not carry objects larger than the platform or use the aerial lift as a crane.

3.21.5.7 Do not drive with the lift platform raised (unless the manufacturer's instructions allow this).

3.21.5.8 Do not operate lower level controls unless permission is obtained from the worker(s) in the lift (except in emergencies).

3.21.5.9 Do not exceed vertical or horizontal reach limits.

3.21.5.10 Do not operate in high winds above those recommended by the manufacturer.

3.21.5.11 Do not override hydraulic, mechanical, or electrical safety devices.

3.21.5.11.1 Treat all overhead lines and cables as energized and do not let any portion of the equipment, including the boom and load, come within 10 feet of any electrical lines.

3.21.5.11.2 If necessary, arrange for the power company to de-energize power lines in the vicinity of the work.

3.21.5.12 Insulated aerial lifts offer protection from electric shock and electrocution by isolating the worker from electrical ground. To maintain the effectiveness of the insulating device, do not drill holes in the bucket.

3.21.5.13 Always stand firmly on the floor of the basket, and not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position.

3.21.5.14 Use approved fall protection with a lanyard attached to the boom or basket when working from an aerial lift in accordance with the WEC *Fall Protection* procedure.

3.21.5.14.1 The fall restraint system may not be attached to adjacent poles or structures.

3.21.6 Inspection Requirements. Pre-start inspection of vehicle components and lift components must be performed per manufacturer's recommendations as described in the Aerial Lift procedure.

3.22 Manual Lifting

3.22.1 Musculoskeletal disorders (MSDs), including back injuries, cause a lot of human suffering, loss of productivity, and economic burden. MSDs are one of the leading causes of worker disability. WEC maintains a Safety Manual procedure entitled *'Manual Lifting and MSD Prevention'* to prevent these injuries from occurring in the workplace. This procedure includes the following requirements for MSD prevention:

3.22.1.1 Training employees and supervisors on proper lifting and MSD injury control measures in order to raise awareness of MSD hazards;

3.22.1.2 Tracking of MSD statistics;

3.22.1.3 Incorporation of a MSD and Manual Lifting hazard assessment into the Job Safety Analysis (JSA) or pre-work hazard assessment; and

3.22.1.4 Prevention of MSD hazards through the application of engineering and/or administrative controls where practicable, with a lesser emphasis on use of personal protective equipment (PPE).

3.22.2 Worksite Hazard Assessment. Before work is performed, potential MSD and lifting hazards must be identified and addressed as part of the JSA or other pre-work hazard assessment. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if a two-man lift should be used to reduce injury potential, whether vision will be obscured while carrying, and the conditions of the walking surface and path to be taken when carrying the object. The assessment should consider all potential hazards associated with work to be performed as described in the Safety Manual procedure for *Manual Lifting and MSD Prevention.*

3.22.3 Handling Heavy or Awkward Loads. All practicable means should be taken to facilitate safe lifting, holding or transporting by workers, or to otherwise minimize the manual lifting of heavy or awkward loads as described in the Safety Manual procedure for *Manual Lifting and MSD Prevention*.

3.22.4 Manager Responsibilities

3.22.4.1 Ensure supervisors and employees follow the *Manual Lifting and MSD Prevention* procedure.

3.22.4.2 Ensure the availability of assets as required for this procedure to be met; and

3.22.4.3 Prioritize use of engineering and/or administrative controls where practicable to address MSD hazards with a lesser emphasis on use of personal protective equipment

3.22.5 Supervisor Responsibilities

3.22.5.1 Ensure that employees follow this procedure;

3.22.5.2 Evaluate employees to ensure material handling and manual lifting is performed in a manner consistent with the intent of this program;

3.22.5.3 Evaluate work areas and employees' work techniques to assess the potential for, and prevention of, injuries;

3.22.5.4 Participate with management in the planning of new operations to engineer out hazards before work processes are implemented;

3.22.5.5 Provide appropriate material handling and manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, mechanized dollies, carts, and hoists for employees;

3.22.5.6 Provide, where practicable, other engineering controls such as lift tables, work station design, etc.; and

3.22.5.7 Ensure that employees are using, and properly using, material handling equipment that is provided.

3.22.6 Employee Responsibilities

3.22.6.1 Attend manual lifting, material handling, and related MSD injury prevention training provided by supervisors and EHS Department personnel;

3.22.6.2 Practice proper lifting and MSD injury prevention strategies consistent with the *Manual Lifting and MSD Prevention* procedure and training received;

3.22.6.3 Include MSD injury prevention into the JSA or pre-work hazard assessment and ensure that control measures are implemented to eliminate, minimize or reduce, so far as is reasonably practicable, the risk of MSD injury;

3.22.6.4 Correctly use material handling equipment provided by the company, according to manufacturers' recommendations;

3.22.6.5 Report to the supervisor any unsafe acts, unsafe tasks, unsafe conditions or equipment problems

that create MSD hazards using the Near Miss, Hazard ID & Observation Card (Observation Card); and

3.22.6.6 Report any MSD injury incidents to the supervisor and cooperate in the investigation process.

3.22.7 Training

3.22.7.1 WEC shall ensure that a worker who may be exposed to the possibility of MSD injury is trained in specific measures to eliminate or reduce that possibility.

3.23 Using Hand Tools Safely

3.23.1 Company requirements for using hand tools, located in the WEC Safety Manual and entitled *'Using Hand Tools Safely',* include the following provisions:

3.23.1.1 Know how to use your tools & equipment and do not abuse them or use them for tasks which they are not designed.

3.23.1.2 Do not use tools with cracked handles, worn parts, mushroomed heads, makeshift repairs, etc. Return defective tools to the tool room at once. Be sure to advise the tool room attendant of the defect.

3.23.1.3 Never attempt to use or operate any hand tool unless you are familiar with its operation.

3.23.1.4 Never attempt to strike a hardened metal tool on a hardened metal surface without a full face shield and protective clothing to protect against metal slivers penetrating the body.

3.23.1.5 Do not alter any tools, equipment or machines or remove guards.

3.23.1.6 Tool rests on grinders must be kept within 1/8" of the wheel and tongue guards within ¼". Eye shields shall not be removed or moved out of adjustment, and double eye protection is to be worn when doing any grinding.

3.23.1.7 Hand tools will be kept in properly designated locations when they are not being used. Tool

room tools will be returned to the tool room after use.

3.23.1.8 Personal tools should be inspected by the supervisor before used at the workplace, and will be kept in tool boxes when not in use.

3.23.1.9 The correct hand tool must be selected and used for the job in which the tool was designated.

3.23.1.10 A common and cause of accidents is "wrench slipped". Ensure wrench is clean, of the proper length to afford maximum leverage. and secure before use.

3.23.1.11 Improper use of cutting blades, including pocket knives, is another common cause of workplace injuries. Do not use a pocket knife or open blade if the job can be done safer using a more appropriate tool designed for the task such as snips, scrapers, safety box cutters, etc.

3.23.1.12 BEWARE - rings and other jewelry can cause serious injury when working with tools and machinery.

4. WEC ENVIRONMENTAL POLICY

WEC believes that environmental compliance is everyone's responsibility, and that environmental incidents are preventable. All levels of management are responsible for providing the resources necessary to maintain a safe and healthy work environment, for establishing EHS policy and procedures, and for ensuring that our EHS policy and procedures are implemented. Managers and supervisors are responsible for implementation of the company's environmental requirements, and for ensuring compliance by employees on a day-to-day basis. Employees are responsible for following these requirements by performing their assigned tasks and duties in a safe and professional manner in accordance with established environmental guidelines so as not to endanger themselves, co-workers, or members of the general public. Through such joint efforts, our goal of a workplace free of environmental incidents can be achieved. It is WEC environmental policy to:

4.1.1 Comply with applicable laws and regulations governing environmental protection;
4.1.2 Ensure each employee understands their responsibility and is held accountable for environmental performance;
4.1.3 Design and manage operations so as to be protective of the environment;
4.1.4 Continually work to proactively address recognized unsafe conditions and risky behavior;
4.1.5 Recognize and consider the importance of environmental factors where there is competition with economic factors; and
4.1.6 Provide resources necessary for meeting this policy and for employees to comply with procedures for employee safety, health and environmental protection.

5. ENVIRONMENTAL MANAGEMENT PLAN (EMP)

5.1 Overview

5.1.1 The EMP sets minimum environmental procedures, rules and standards that are required to be followed and enforced by all WEC employees and contractors to ensure that operations are conducted in a manner consistent with WEC environmental policy. The EMP provides environmental compliance guidance for the company in a systematic and effective manner, with compliance consisting of adherence to:
5.1.1.1 Applicable Federal, State, and local environmental regulations;
5.1.1.2 All company environmental policies, procedures, and bulletins; and
5.1.1.3 Best environmental management practices.

5.2 Internal Audits & Inspections

5.2.1 The EMP describes the procedure for EHS to conduct audits and to ensure the company is in compliance with applicable Federal, State, and local laws and regulations. Further discussion on implementation of this procedure can be found in Section 1 of this handbook.

5.3 Spill Response

5.3.1 The EMP section entitled *Spill Response* establishes formal written spill response guidelines for all company operations and addresses notification procedures for spills/releases, emergency response procedures, regulatory agency notification information, and potential source areas for material spills on the facility or field site.
5.3.2 Spill Response & Control Material. A supply of spill control materials must be kept readily available for use in response to a spill event. Managers and supervisors at each facility are responsible for ensuring that adequate spill response equipment is stocked at each facility. Examples of recommended spill response equipment include:
5.3.2.1 Absorbent for a 100 gallon spill (kitty litter, absorbent pads, socks, etc.);
5.3.2.2 Brooms and shovels;
5.3.2.3 Protective clothing (rubber boots and gloves); and
5.3.2.4 Waste shipping containers and/or overpack drums.
5.3.3 Emergency Spill Response Procedure. In the event of a spill or release of a known hazardous substance, RCRA hazardous waste, petroleum product – isolate the area to protect employees, follow applicable procedures in the facility Emergency Response Plan. Then provide immediate verbal notification to Risk Management @866-942-7475 for any spill or release:
5.3.3.1 Of oil or petroleum product spill greater than 1 barrel (42 gallons);
5.3.3.2 Of oil, other petroleum product such as gasoline and diesel, or antifreeze that cannot be immediately cleaned up or otherwise removed;
5.3.3.3 A known hazardous substance or RCRA hazardous waste;
5.3.3.4 That may have the potential to contaminate shallow groundwater, that creates a sheen on a

surface water body or stream, or that impacts a storm water drainage feature or suspected wetland;

5.3.3.5 That may require an extensive, non-routine cleanup effort; or

5.3.3.6 That occurs on customer property or that impacts third-party property.

5.3.4 Agency Notification. Regulations require that EPA and State agencies be notified when a reportable spill or release occurs. These notifications will be made by the EHS Director. The EHS Director or his/her designee shall notify the appropriate regulatory agency as soon as possible after discovery of a release. Materials that may trigger notification when released are oil and other petroleum products, hazardous substances, or RCRA hazardous waste.

5.3.5 Spill Response Procedures. Refer to the Spill Response section of the EMP for specific spill response procedures.

5.4 Tanks - Design & Operation

5.4.1 The *'Tanks – Design & Operation'* section of the EMP provides procedures for the proper management of all permanent or temporary aboveground storage containers larger than 110 gallons; including leased or rented tanks, regardless of content or use, except for tanks that contain water (excluding condensate tanks), solids, or gases.

5.4.1.1 All tanks must be constructed and operated in accordance with NFPA 30, Flammable and Combustible Liquids Code, and any applicable federal, state, or local storage tank regulations. .

5.4.2 The type, use, and placement of permanent or temporary tanks shall be approved by the Environmental Department prior to bringing the tank on-site.

5.4.3 Design & Construction. When leasing, acquiring or purchasing tanks, each company facility shall design

and construct the tank system to ensure the structural integrity of the tank system throughout the operating lifetime.

5.4.3.1 Tanks and piping shall be designed and constructed in accordance with recognized good engineering standards;

5.4.3.2 Tank construction material shall be compatible with the material to be stored;

5.4.3.3 Each tank shall be labeled, constructed, installed, and used in accordance with recognized standards;

5.4.3.4 New tanks should be designed with a means visually assess whether a leak is occurring from the tank bottom.

5.4.4 Secondary Containment. Secondary containment is required for all tanks and drums having a capacity of 55 gallons or more. Secondary containment must meet the following requirements:

5.4.4.1 Containment systems shall be impervious to the tank contents for at least 72 hours;

5.4.4.2 Containment construction must be compatible with the tank contents;

5.4.4.3 Be resistant to heat, cold, sunlight, or other natural conditions;

5.4.4.4 Have sufficient strength and durability to resist tearing, cracking, collapsing, etc. for the operating lifetime of the tank system;

5.4.4.5 Bust be easily maintainable;

5.4.4.6 Be of sufficient size to contain 110% of the volume of the largest tank within the containment area, or more if required by Federal, State or local rules;

5.4.4.7 Be of sufficient size to contain all critical piping and associated components;

5.4.4.8 Encompass loading unloading connections and drip pans provided for any additional loading/unloading connections.

5.4.5 Approved Secondary Containment Systems. The following secondary containment systems are allowed:
- 5.4.5.1 Steel catchment basins or spill skids;
- 5.4.5.2 Concrete or masonry structures;
- 5.4.5.3 Earthen structures, only when used in conjunction with an appropriate liner or coating;
- 5.4.5.4 Secondary containment tanks such as double-walled tanks.

5.4.6 All secondary containment systems must be maintained to prevent any accumulation of water, leaves, weeds, stored items, or anything else that may interfere with the design capacity and visual detection of leaks and spills. Secondary containment areas are not to be used for the storage of equipment or other items. Plugs or valves should be kept closed at all times except when draining the secondary containment system after first inspecting for the visual or olfactory presence of contaminants (oil, liquid waste, etc.). Contaminated rainwater, including that having a visible oil sheen, may not be released to the environment and must be managed as waste and disposed in accordance with Federal and State requirements. Contact the EHS Director for assistance in managing contaminated rainwater.

5.4.7 Corrosion Protection. Corrosion protection increases the operating lifetime of metal tanks, as well as provide protection against leaks.
- 5.4.7.1 All tank systems subject to corrosion must be properly protected to ensure leaks do not occur. This includes tanks and piping placed on the ground, pad, or any steel, masonry, or concrete foundation or pipe/tank stand, as these are locations for accelerated corrosion.
- 5.4.7.2 If corrosion is anticipated beyond the design specifications, additional thickness or a suitable protective coating or lining will be provided for the expected corrosion loss.

- 5.4.7.3 All tank systems subject to corrosion will be, at a minimum, coated and or painted.
- 5.4.7.4 All tanks must be placed on a footing to prevent corrosion and allow for visual determination of tank bottom leakage.

5.4.8 Pumps
- 5.4.8.1 Liquids may not be dispensed from a tank by pressurization or the tank.
- 5.4.8.2 Suction pumps will be located as close as possible to the operating equipment.
- 5.4.8.3 Means must be provided to prevent the release of liquid by siphon flow.

5.4.9 Spills & Overflows
- 5.4.9.1 Tank filling must not begin until the operator has confirmed that adequate available capacity exists by using a site glass or by direct measurement of the tank level.
- 5.4.9.2 An attendant must be physically present to monitor all manual transfers to and from the tank system.
- 5.4.9.3 For non-continuous manual transfers, reservoirs, pans, catchment basins, etc., must be used to contain any spillage from the transfer hose during and after the loading process.
- 5.4.9.4 For continuous transfer type tanks, a check valve and a shutoff valve with a quick-connect coupling or a dry-break valve must be installed. This connection/device must be protected from tampering and physical damage.

5.4.10 Venting. Continual-feed tanks must be adequately vented to prevent development of vacuum or pressure which exceeds the design pressure of the tank as a result of filling, emptying, or temperature changes. Venting of tanks shall be in accordance with API standards or other accepted standards.

5.4.11 Location of Tanks.

5.4.11.1 Tanks shall rest on foundations of concrete, masonry, or steel to allow visual inspection for bottom leaks. The foundations shall be designed to minimize the possibility of uneven settling and to minimize corrosion.

5.4.11.2 Tank systems shall be located away from certain dangers specified in the *Tanks – Design & Operation* document to minimize the dangers of fires and other hazards.

5.4.12 Inspections. Above-ground storage tanks must be visually inspected and integrity tested in accordance with the facility Spill Prevention Control and Countermeasures (SPCC) Plan, if applicable.

5.4.13 All tanks shall have a signs or labels stating the tank contents and shall be marked in accordance with OSHA's HazCom and NFPA 704 requirements.

5.4.14 Access to tank interiors is subject to the *Entering a Confined Space* procedure located in the WEC Safety Manual.

5.4.15 All tanks and piping in flammable material service shall be grounded.

5.5 Waste Management

5.5.1 The Environmental Protection Agency's (EPA) regulations in the Resource Conservation and Recovery Act (RCRA) govern the generation, storage, shipment, and disposal of hazardous waste, also known as "Cradle to Grave". These regulations require a system of recordkeeping, labeling, and manufacturing practices to ensure proper waste generation and disposal requirements are being met.

5.5.2 Waste Characterization. Each company facility is a waste generator and is required to determine whether waste generated by the facility is a RCRA hazardous or non-hazardous waste. This step is called "Making a Waste Characterization". EHS will support each facility in properly documenting each waste stream generated along with classification of each waste as

hazardous or non-hazardous. Supporting documentation for each of the Waste Characterizations will be maintained by EHS. Waste characterizations should be periodically re-evaluated at regular intervals and whenever changes occur in materials used, or the waste generating process changes, or there are other activities at the business that may impact the type of waste.

5.5.3 Waste Segregation. Never mix different waste streams together without prior approval from the EHS Director. Each waste stream should be placed in its designated container and stored within its designated area (drum staging, satellite accumulation, universal waste, scrap metal, or trash dumpster). Each waste drum or container must be:

5.5.3.1 Non-absorbent, watertight, insect resistant, durable, easily cleanable, and designed for safe handling;

5.5.3.2 Of sufficient size to prevent overflow;

5.5.3.3 Maintained in a clean and sound condition;

5.5.3.4 Labeled with the words "Hazardous Waste", "Non-Hazardous Waste", "Used Oil", "Scrap Metal", "Trash", "Universal Waste", or whichever the case may be, and the date when waste began to accumulate in that container. Examples of proper waste container labels are provided in the EMP;

5.5.3.5 Kept closed with bungs and other openings firmly secured. Drums and containers may only be opened when adding or removing waste;

5.5.3.6 Inspected weekly for proper labeling, leaks or corrosion; and

5.5.3.7 Stored or located within an area equipped with secondary containment unless it contains only solid material and no free liquid.

5.5.4 "Satellite Accumulation" of Hazardous Waste. Regulations allow for up to 55 gallons of RCRA

hazardous waste to be collected in a container/drum located at or near its initial point of generation for an indefinite amount of time. This is known as "satellite accumulation". The following procedures must be adhered to for each satellite accumulation container/drum:

5.5.4.1 The container is clearly marked with the words "Hazardous Waste" or with a description of the waste that is within the container. Examples of proper descriptions on waste container labels are provided in Appendix F. Any required hazard warning labels should also be placed on the container;

5.5.4.2 The container is kept closed except when adding or removing waste. The safety funnels that screw into the 2 inch bung hole may be used, but the lids must be kept closed except when adding waste;

5.5.4.3 When filled to within 6 inches of the top, the filled drum must be marked with the date it was filled and relocated within 3 days to the facility's designated area for storage of hazardous waste drums; and

5.5.4.4 Any container used to replace a filled satellite accumulation container is marked with the words "Hazardous Waste" or with a description of the waste to be placed within it.

5.5.5 Hazardous Waste Disposal Scheduling. The time that hazardous waste can be stored on site before it is shipped offsite varies based on generator status. Most company facilities are considered *Small Quantity Generators* for which hazardous waste must be stored for no longer than 180 days from the date the drum or container has been filled, and marked full. *Large Quantity Generators* have 90 days instead of 180 days. However, in order to maintain a clean working

environment, all wastes should be shipped according to a regular schedule.

5.5.6 Waste Disposal Shipments. Each facility is responsible for the proper management, transport, and disposal of the waste generated at the facility. This includes waste that will be generated by work performed by contractors. The Company Contract Administrator must coordinate with the contractor before work begins to ensure that waste management responsibilities and procedures are clearly defined and understood. A DOT & EPA authorized transporter and approved disposal contractor that is fully insured and Company approved. *(Contact the EHS Director for assistance.)*

5.5.6.1 Manifesting Hazardous Waste Shipments. Federal and State regulations require "Cradle to Grave" tracking of RCRA hazardous waste. Two forms are required: A Uniform Hazardous Waste Manifest and Land Ban documentation. A Uniform Hazardous Waste Manifest is a multiform shipping document that must accompany all hazardous waste shipments. In general, the following rules apply: Upon pick up, keep the "Generator's Copy" of the manifest with transporter's signature. The disposal company will return the original white copy with all signature blocks complete. Both copies shall be stapled and filed together in the facility's approved recordkeeping system along with any Land Ban documentation

5.5.7 Recordkeeping. Each facility's generator status is determined by the amount of waste generated in a calendar month. Records must be maintained regarding amounts of waste generated. Shipping documents that record the amount of each waste stream sent for disposal must be maintained at the facility and may be used to track generation amounts.

Each facility must also maintain documentation pertaining to the disposal of RCRA hazardous and non-hazardous waste for the previous five years and be available in the Company's approved recordkeeping system. This documentation will include trip tickets, bill of ladings, disposal contractor invoices, manifest, or any other documentation which demonstrates proper disposal.

5.5.8 Training. WEC EHS will provide training to employees on the proper methods for management, storage and disposal of hazardous and non-hazardous wastes. Training will ensure that affected employees are familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

5.6 Wastewater Discharges, Air Emissions And Permits

5.6.1 This EMP document establishes written policy for all company operating locations regarding any Federal, State, or local permit requirement for air emissions and wastewater discharges.

5.6.2 The EPA and many state regulatory agencies require every business to obtain authorization (e.g., a permit) for operations that produce air pollution, discharge wastewater or sanitary wastewater, or engage in construction activities that can impact the quality of storm water runoff. These authorizations or permits must be obtained prior to the start of construction, demolition, modification, storm water quality impact, or wastewater discharge.

5.6.3 Authorizations and permits may require several months to obtain and each state has slightly different requirements for when a permit, notice of intent, or other regulatory document must be filed. This policy provides that managers give advance notification to the EHS Director of any of planned activities that may require agency authorization in order to avoid untimely project delays.

5.6.4 Permits may be required before:

5.6.4.1 Purchasing new property;

Note: *An environmental assessment must be completed by EHS on any proposed property purchase as part of due diligence.*

5.6.4.2 Commencing land clearing for a project that will disturb up to 1 acre of land;

5.6.4.3 Constructing, relocating or operating a paint booth, sandblasting operation, or other process that produces air emissions ;

5.6.4.4 Before generating a wastewater that is to be discharged from the facility, or before increasing the amount or characteristics of wastewater currently being discharged from a facility;

5.6.4.5 Before replacing or demolishing an existing emissions source, or before demolishing or remodeling a structure containing asbestos.

5.6.4.6 Air Permit. An air permit may be required for new and existing operations based upon the levels of pollutants, such as nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compounds (VOCs), and particulate matter (PM), which are emitted, or may be emitted. Air permit requirements vary depending upon where the facility is located, total existing emissions at the facility, and total new emissions to be produced by a new or existing operation.

5.6.5 Advance Notification Requirement. Project planners must notify the EHS Director prior to implementing any plans to purchase property, engage in new construction, clear land for development, construct, demolish, or modify a facility, or any plans to produce industrial wastewater or sanitary wastewater that will be discharged from the facility.

5.6.5.1 The EHS Director will review the project and determine requirements for an environmental

assessment; new permit or permit modification, or advance agency notification. If required, the EHS Director will coordinate with the Project Manager to perform this activity in advance. If a new permit or permit modification is required, the EHS Director will inform the project planner of schedule requirements for accomplishing this.

5.7 Reporting EHS Incidents

5.7.1 In order to deal effectively with environmental, regulatory, and legal concerns, the EHS Director or his/her designee must be promptly advised of any abnormal incident or condition at all operating locations.

5.7.2 Immediate Verbal Reporting. It is understood that environmental incidents that require special attention may occur, including agency inspections, third party complaints, potential instances of non-compliance, accidental spills, etc. In the event of a spill, a sudden release, or other emergency, employees are to use whatever emergency measures are deemed necessary and appropriate to control the incident safely. This emergency action should be taken first, but not in lieu of, verbally reporting the condition. Spills are to be immediately reported to Risk Management in accordance with spill response guidelines in this document. Risk Management will in turn notify the EHS Director as necessary. Once notified, the EHS Director will in turn determine the best course of action.

5.7.3 Types of Reportable Abnormal Environmental Incidents. The following list includes examples of conditions that must be immediately reported to Risk Management. This list is not all encompassing and employees should use their best judgment with regard to circumstances that require reporting. Risk Management should be notified if there is any doubt

as to whether an environmental incident should be reported.

5.7.3.1 Notice of a planned visit by representatives of any environmental regulatory or law enforcement agency;

5.7.3.2 Visit or inspection from representatives of any environmental regulatory agency or law enforcement agency;

5.7.3.3 Environmental release incident or historical contamination that impacts property outside a Company facility or has the potential to contaminate groundwater. This includes releases of wastewater or other contaminants to a stormwater ditch, drain, culvert, gulley, or other stormwater conveyance system;

5.7.3.4 Any release or discovered historical contamination that has the potential to contaminate groundwater;

5.7.3.5 Any known or suspected permit violation or non-compliance issue;

Note: *Examples include discovery of unlabeled drums containing unknown contents, a spill incident that impacts an adjacent property, previously unrecognized air emissions at a facility that operates under an air permit or standard exemption, deviation from permitted emissions limits, discovery of company waste being abandoned or illicitly dumped.*

5.7.3.6 Any received correspondence, complaint, inquiry, warning, citation, or notice of violation covering any environmental concern issued by a regulatory agency, concerned citizen, law enforcement agency, or an attorney general's office;

5.7.3.7 Any informal requests from environmental regulators or private citizens regarding facility practices, methods, operations, or procedures;

5.7.3.8 Any release of oil (Used Oil, virgin oil, diesel, gasoline) that creates a sheen on a public water body;

5.7.3.9 Any spill or release of RCRA Hazardous Waste;

5.7.3.10 Any transportation-related environmental release on or off plant property; and

5.7.3.11 Any fire, explosion or other significant emergency that may impact or be noticeable by the local community.

5.8 Environmental Recordkeeping

5.8.1 The purpose of this EMP document is to establish a consistent method of maintaining EHS records at each company facility in order to facilitate regulatory compliance.

Note: *Safety Manual Procedure EHS A-02 is the internal document and data control procedure used by the EHS Department to manage policies, rules, procedures, forms and records in a manner consistent with a robust and comprehensive EH&S program. Procedure EHS A-02 is intended to standardize document and record management across all business organizations.*

5.8.2 Each facility is required to maintain all environmental files in a central location for easy retrieval and inspection by agency representatives, EHS Department representatives, and plant personnel. For unmanned facilities, files should be located at the nearest regional office. Environmental records should be kept for 5 years unless specifically instructed by EHS Departmental representatives.

5.8.3 All environmental files should be organized by environmental area (i.e., air, water, waste, drinking water, SPCC) as prescribed by the Environmental Recordkeeping policy found in the EMP.

5.9 Refrigerant Use Compliance

5.9.1 Chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs), also known by the trade name Freon, are collectively known and used as refrigerants. They have also historically been used in the manufacturing of many products, such as foam insulation and electronics equipment. When released to the air, CFCs and HCFCs drift some 30 miles above the Earth to the stratospheric ozone layer - a layer of gas that screens us from the sun's powerful ultraviolet (UV-B) radiation. Once there, they break apart to release chlorine atoms that attack ozone molecules. A depleted ozone layer allows more UV-B radiation to reach Earth and this can harm living organisms in many ways; including important food crops, marine ecosystems, and increasing incidences of skin cancer and cataracts.

5.9.2 Section 608 of the Clean Air Act (CAA) Amendments of 1990 directs EPA to establish requirements to prevent the release of ozone-depleting substances during the servicing, repair, or disposal of appliances and industrial process refrigeration. Section 609 of the CAA establishes standards specifically for the service of motor vehicle air conditioners (MVACs). This policy is intended to ensure Company compliance with these standards.

5.9.3 Requirements Summary. EPA has established regulations under the CAA that:

5.9.3.1 Require service practices that maximize recycling of ozone-depleting compounds (both chlorofluorocarbons [CFCs] and hydrochlorofluorocarbons [HCFCs] and their blends) when servicing and disposing of air-conditioning and refrigeration equipment;

5.9.3.2 Require company technicians who service equipment and individuals involved in /refrigerant recycling, recovery and reclaiming activities to be trained and certified;

5.9.3.3 Require that refrigerants be sold only to certified technicians;

5.9.3.4 Require persons servicing or disposing of air-conditioning and refrigeration equipment to certify to EPA that they have acquired recycling or recovery equipment and are complying with the requirements of the rule; and

5.9.3.5 Establish safe disposal requirements to ensure removal of refrigerants from goods that enter the waste stream with the charge intact (e.g., motor vehicle air conditioners, home refrigerators, and room air conditioners).

5.9.4 A detailed procedure on how to properly implement this policy is available upon request to the EHS Director.

5.10 Waste Aerosol Can Management

5.10.1 The EMP document defines actions required for Company facilities regarding management and disposal of aerosol cans. Implementation of this policy will ensure that waste aerosol cans are managed in a manner that is protective of the environment in accordance with Federal, State, and local requirements. The policy is applicable to disposal of non-fillable and non-reusable aerosol cans.

5.10.2 An aerosol can is considered "waste" when its contents are no longer useful and it is to be disposed. Regulations covering management of RCRA hazardous waste set out procedures for establishing that a container is "empty". Aerosol cans that are "empty" are no longer subject to regulation as RCRA hazardous waste and can be disposed in regular trash or managed as scrap metal. All waste aerosol cans should be punctured to ensure they are depressurized,

drained and "empty". Aerosol cans that have been punctured, depressurized and drained into a designated and properly labeled Hazardous Waste container may be placed in a facility trash receptacle for disposal.

Note: *Contact the EHS Director for assistance in locating appropriate can puncturing devices.*

5.11 Waste Battery Management

5.11.1 Batteries are found in every electronic device imaginable. All of these batteries must eventually be disposed of, and many batteries must be managed as Hazardous Waste because of their toxic contents or reactive properties. Proper management for various types of waste batteries is detailed in this correspondence. A 'battery' is a device consisting of one or more electrically connected electrochemical cells, which is designed to receive, store, and deliver electric energy. An electrochemical cell is a system consisting of an anode, cathode, and an electrolyte, plus such connections (electrical and mechanical) as may be needed to allow the cell to deliver or receive electrical energy. This term includes an intact, unbroken battery from which the electrolyte has been removed.

5.11.2 Primary Batteries. Primary batteries are non-rechargeable batteries. They include zinc carbon batteries, alkaline batteries, button cell batteries and lithium batteries.

5.11.2.1 The zinc carbon battery is labeled as "all purpose" or "general purpose" and discharges quickly if used continuously. The zinc chloride cells are longer lasting and are labeled "heavy duty" or "super heavy duty."

5.11.2.2 Alkaline batteries can last up to ten times longer than zinc batteries, but may cost three to five times more.

5.11.2.3 Button cell batteries are small, disc-shaped batteries commonly used in hearing aids, medical devices, watches, calculators and cameras.

5.11.2.4 Lithium batteries can last about twice as long as alkaline batteries but are more expensive. Lithium batteries are labeled as such to distinguish them from other battery types.

5.11.3 Secondary batteries are rechargeable batteries. They are available as free standing units or as built-in components of rechargeable devices. Free standing secondary batteries are more expensive but can be recharged many times. These batteries are best-suited to devices that get regular use. The most common types of secondary batteries include nickel cadmium (Ni-Cd), sealed lead-acid (Pb), nickel metal hydride (Ni- MH), and lithium ion (Li- Ion).

5.11.3.1 Nickel Cadmium is the most common type of rechargeable battery that can be built as freestanding units or installed within rechargeable appliances. A single nickel cadmium battery can replace about 150 alkaline batteries.

5.11.3.2 Sealed lead-acids are used in some camcorders and cellular phones. They are less expensive, but much heavier than other types of rechargeable batteries.

5.11.3.3 Lead-acid motor vehicle batteries are a larger type of sealed lead-acid battery used in a variety of applications, particularly in self-propelled equipment including automobiles, heavy equipment, boats, etc.

5.11.3.4 Nickel Metal Hydride batteries are commonly used in computers, cellular phones, and camcorders. These batteries have a low drain and high-energy capacity.

5.11.3.5 Lithium Ion batteries are expensive, extremely light, and high in energy density. These batteries

are used in some cellular phones and notebook computers.

5.11.4 Hazardous Waste Batteries. Waste batteries that are considered Hazardous Waste contain corrosive liquids or one or more of the following eight metals: cadmium, lead, zinc, manganese, nickel, silver, mercury and lithium. When disposed of in an unlined landfill, a battery can leach toxic constituents and contaminate groundwater. Mercury and cadmium pose a special threat when incinerated because they are volatilized by the incinerator process to create breathable emissions or leachable elements in ash. Waste batteries that are Hazardous Waste are to be stored, labeled, and managed under streamlined collection standards for Universal Waste developed by the Environmental Protection Agency (EPA). Universal Waste standards were created to make it easier for companies to collect the waste batteries, and encourage their recycling. Contact the EHS Director for assistance in managing your waste battery storage and handling needs.

5.11.5 Disposal / Recycling Options

5.11.5.1 Alkaline batteries sold after May 13, 1996, have no mercury added and may be placed in the regular trash. These may be identified by seeing a green stripe, green tree, “Hg free” label, or an expiration date later than 1998. Older batteries may contain mercury, and should be collected, labeled, and managed as Universal Waste.

5.11.5.2 Zinc carbon and zinc chloride batteries are non-hazardous and can be placed in the trash.

5.11.5.3 Lithium batteries are considered Hazardous Waste and are potentially reactive if not completely discharged. These batteries must be collected, labeled, and managed as Universal Waste.

5.11.5.4 Button cell batteries may contain mercury or other hazardous substances, such as silver. These batteries must be collected and managed as Universal Waste.

5.11.5.5 Secondary batteries must collected, labeled and managed as Universal Waste. Most places that sell these batteries will take them back so the best way to manage this waste is to simply trade in old batteries with the new battery supplier.

5.11.5.6 Lead-acid motor vehicle batteries must be collected, labeled and managed as Universal Waste. Companies that generate these batteries must store them so the battery housing won't break and release the acid onto the environment. Transporters of spent lead acid batteries being reclaimed must ensure that they are loaded and braced to prevent short circuits and damage.

Note: *Hazardous Waste batteries generated within households are not required to be managed as Universal Waste. Instead households can save them for a local household hazardous waste collection. Contact your local municipality for details.*

5.11.6 Storage and Handling of Universal Waste Batteries

5.11.6.1 Batteries should be placed in a cool, dry area, away from flammable materials. Because they can carry a residual charge and short circuit to create a fire hazard that is difficult to extinguish, tape should be placed over the electrodes or the batteries should be placed in individual plastic bags before storing.

5.11.6.2 For safety reasons owing to their short circuit potential, batteries should be collected in a designated location that is subject to regular monitoring.

5.11.6.3 Universal Waste Battery collection containers must be clearly labeled as "Universal Waste – Batteries". Pallets used to store waste lead acid motor vehicle batteries can be designated with a sign that bears this wording. Universal Waste container labels and signs can be obtained by contacting the EHS Director.

5.11.6.4 Leaking batteries should be stored in structurally sound, closed containers. Contact the EHS Director for assistance in responding to leaking batteries.