

RAWHIDE

LEASING

SAFETY AND HEALTH PROGRAM MANUAL

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POLICY STATEMENT ON SAFETY

The management of this RAWHIDE LEASING COMPANY, LLC is very interested in & committed to working with you to provide a safe place in which to work. The prevention of accidents and injuries to our employees is the prime objective.

All RAWHIDE LEASING COMPANY, LLC personnel are expected to take an active and constant interest in the prevention of accidents. We call upon all employees to use good common sense and in all their actions, take a second to think of the consequences to your fellow employees. We cannot overemphasize that all employees must do their part to minimize accidents.

Please show your support by demonstrating the following:

1. FOLLOWING RAWHIDE LEASING COMPANY, LLC SAFETY RULES.
2. KEEPING WORK AREAS FREE OF UNSAFE CONDITIONS.
3. AVOIDING AND ELIMINATING UNSAFE ACTS.
4. PROMPTLY REPORTING UNSAFE ACTS AND CONDITIONS.
5. REPORTING ALL INCIDENTS IMMEDIATELY.

Accidents cause suffering and pain. We value each of you as individuals and hope you will cooperate with us in this important endeavor.

Any constructive criticism or suggestions toward improving safety on any of our jobs will be given prompt and careful consideration.

Sincerely,

*Walter Godsil
Safety Manager
Rawhide Leasing Company, LLC.*

DUTIES AND RESPONSIBILITIES

A successful Safety Management System can only be achieved and maintained when there is active interest, participation, and accountability at all levels of the organization. To ensure this, the RAWHIDE LEASING COMPANY, LLC, delegates the following safety duties to all management personnel. In some cases employees will need to perform safety duties outside their regular responsibilities to prevent accidents.

The Safety Manager must plan, organize, and administer the program by establishing policy, setting goals and objectives, assigning responsibility, motivating subordinates, and monitoring results. RAWHIDE LEASING COMPANY, LLC management will support and maintain an ongoing Safety and Injury and Illness Prevention Program through the following:

1. Providing clear understanding and direction to all management and employees regarding the importance of safety through the development, implementation, monitoring and revision of policy and procedures.
2. Providing financial support for the Safety / Injury and Illness Prevention Program through the provision of adequate funds for the purchase of necessary safety materials, safety equipment, proper personal protective equipment, adequate time for employee safety training, and maintenance of tools and equipment.
3. Overseeing development, implementation, and maintenance of the safety manual, IIPP, and other required safety programs.
4. Maintaining a RAWHIDE LEASING COMPANY, LLC commitment to accident prevention by expecting safe conduct on the part of all managers, supervisors, and employees.
5. Holding all levels of management and employees accountable for accident prevention and safety.
6. Reviewing all accident investigations to determine corrective action.

Managers and Supervisors play a key role in the prevention of accidents on the job. They have direct contact with the employees and know the safety requirements for various jobs. Safety responsibilities for these individuals include:

1. Enforce all safety program content and ensure safe work procedures.
2. Verifying corrective action has been taken regarding safety hazards and accident investigations.
3. Conducting periodic documented inspections of the work sites to identify and correct unsafe actions and conditions that could cause accidents.
4. Act as a leader in RAWHIDE LEASING COMPANY, LLC safety policy and setting a good example by following all safety rules.
5. Becoming familiar with local, state, and federal safety regulations. The EHS Manager is available for assistance.
6. Train all new and existing employees in proper safety procedures and the hazards of the job.
7. Instruct all employees, under their supervision, in safe work practices and job safety requirements.
8. Hold weekly safety meetings with employees.
9. Ensure employee proficiency when assigning work requiring specific knowledge, special operations or equipment.
10. Ascertain that all machinery, equipment, and workstations are maintained in safe working condition and operate properly.
11. Correct unsafe acts and conditions that could cause accidents.
12. Communicate with all employees about safety and accident prevention activities.
13. Correct the cause of any accident as soon as possible.
14. Ascertain that proper first aid and firefighting equipment is maintained and used when conditions warrant its use.
15. Maintain good housekeeping conditions at all times.
16. Investigate all injuries and accidents to determine their cause and potential corrective action.

17. Ascertain that all injuries involving our employees that require medical attention are properly treated and promptly reported to the office.

The Safety Manager acts as a safety resource for the RAWHIDE LEASING COMPANY, LLC and is responsible for maintaining program records. They will also be our primary person to deal with outside agencies regarding the safety program and its contents. Additional duties include:

1. Coordination of all loss prevention activities as a representative of management. Acting as a consultant to management in the implementation and administration of the Safety Program.
2. Develop and implement loss prevention policies and procedures designed to insure compliance with the applicable rules and regulations of all federal, state, and local agencies.
3. Review all accident reports to determine cause and preventability.
4. Conduct periodic reviews of the program and job sites to evaluate performance, discuss problems and help solve them.
5. Consult with representatives of our insurance companies in order that their loss control services will support the Safety Program.
6. Review Workers' Compensation Claims. Help supply the insurance carrier with information about injured employees in order to keep loss reserves as low as possible.

Every employee is responsible for working safely, both for self-protection and for protection of fellow workers. Employees must also support all RAWHIDE LEASING COMPANY, LLC safety efforts. Specific employee safety responsibilities include:

1. If you are unsure how to do any task safely, ask your supervisor.
2. Read and abide by all requirements of the Safety Manual.
3. Know and follow the Code of Safe Practices and all RAWHIDE LEASING COMPANY, LLC safety policies and rules.
4. Wear all required personal protective equipment.
5. Report all accidents and injuries, no matter how minor, to your supervisor immediately.
6. Do not operate any equipment you have not been trained and authorized to use.
7. Report any safety hazards or defective equipment immediately to your supervisor.
8. Do not remove, tamper with or defeat any guard, safety device or interlock.
9. Never use any equipment with inoperative or missing guards, safety devices or interlocks.
10. Never possess, or be under the influence of, alcohol or controlled substances while on the premises.
11. Never engage in horseplay or fighting.
12. Participate in, and actively support, the RAWHIDE LEASING COMPANY, LLC safety program.

ASSURED EQUIPMENT GROUNDING

Purpose

The purpose of this program is to eliminate potential hazards presented by the use of power equipment, power equipment cords, extension cords, receptacles and other related equipment.

Scope

This program applies to all RAWHIDE LEASING COMPANY, LLC employees, contractors and subcontractors who work with, on or near electrical tools or equipment. This program also applies to all RAWHIDE LEASING COMPANY, LLC work sites where RAWHIDE LEASING COMPANY, LLC employees, contractors and subcontractors are present.

Responsibilities

Safety Manager

- Responsible for assured equipment grounding program execution.
- Keep abreast of current regulations and revise the program when necessary.
- Perform annual audits of this program to ensure adequacy.
- Serve as a competent person.

Supervisors

- Serve as competent persons for this program.
- Execute this program entirely where applicable.
- Ensure that visual inspections are performed on electrical equipment and repair or replace removed, tagged or defective equipment as soon as possible.
- Enforce general compliance with this program.

Employees

- Comply with all procedures in this program.
- Perform visual inspections of electrical tools, equipment and energy sources.
- Remove and tag defective electrical equipment and notify your supervisor of defects.

Definitions

Ground Fault Circuit Interrupter (GFCI) – a fast acting circuit breaker designed to shut off electric power in the event of a ground-fault within as little as 1/40 of a second. It works by comparing the amount of current going to and returning from the equipment along the circuit conductors. When the amount going differs from the amount returning by approximately 5 mill amperes, the GFCI interrupts the current.

Competent Person - one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Procedures

The following procedures and guidelines are designed to eliminate all injuries resulting from possible malfunctions, improper ground and/or defective tools. It is the responsibility of both supervisors and employees to ensure that these procedures are strictly adhered to.

Assured Equipment Grounding Conductor Program (AEGCP)

A site specific assured grounding conductor program shall be implemented on all RAWHIDE LEASING COMPANY, LLC work sites that covers all cords, plug-in electrical power tools, and receptacles which are not part of the permanent structure and are available for use by RAWHIDE LEASING COMPANY, LLC employees.

Ground Fault Circuit Interrupters (GFCI)

All 120 and 240-volt receptacles which are not part of the permanent structure and are used by RAWHIDE LEASING COMPANY, LLC employees must have approved ground fault circuit interrupters. All GFCI must be tested prior to each use.

Equipment Requirements

Equipment that does not meet the requirements of this program or is found to be defective shall not be used by RAWHIDE LEASING COMPANY, LLC employees and shall be repaired or replaced so that program requirements are satisfied.

Equipment Inspections

Visual equipment inspections shall occur daily and before each use in order to identify hazards presented by equipment defects. Possible defects include but are not limited to cuts, abrasions, burns, exposed wires and broken or missing pins of extension cords, equipment power cords and receptacles.

Any equipment or equipment parts, which are found to be defective or present a potential hazard, shall be repaired or replaced prior to use. All equipment that cannot be repaired must be tagged and discarded immediately.

Equipment Tests and Records Maintenance

Tests on all equipment grounding conductors must be conducted prior to each use, following any repairs and at 3 month intervals for non-fixed equipment or 6 month intervals for permanently fixed equipment which is not exposed to damage, in order to ensure continuous electrical continuity.

Equipment testing records shall indicate equipment identity such as cord, receptacle that is not part of the permanent structure or plug-in power equipment and the date it was last tested or interval test dates. Records shall be in the form of written logs or color-coding and shall be available at the work site at all times for RAWHIDE LEASING COMPANY, LLC review.

All extension cords and power equipment cords shall be marked on either end of the cord with color tape that corresponds with the month represented in the table below to ensure that the monthly test schedule is maintained.

Test Month	Corresponding Tape Color
January	Blue
February	Green
March	Red
April	White
May	Black
June	Brown
July	Continue Color Sequence with Blue Tape for July

BLOODBORNE PATHOGENS

Purpose

The purpose of this program is to establish and maintain a written exposure control plan that protects employees who may have contact with blood or any other potentially infectious material. This program is also designed to meet the requirements of OSHA 29 CFR 1910.1030; which requires employers who can reasonably anticipate exposure to prepare and implement a written exposure control plan.

Scope

This program applies to all occupational exposure to blood or other potentially infectious materials and covers all RAWHIDE LEASING COMPANY, LLC employees. Employees whose responsibilities include cleaning up after a workplace injury, rendering first aid, providing life support or some other task that involves directly working with biohazards are more likely to have occupational exposure. However, any employee could be at risk as a result of blood from an injury that occurred in the past or a historical presence of bodily fluids that was not adequately decontaminated.

Responsibilities

Safety Manager (Exposure Control Officer)

- Serve as the designated “Exposure Control Officer”, which is responsible for the overall development and implementation of the exposure control procedure for all RAWHIDE LEASING COMPANY, LLC worksites.
- Ensure that RAWHIDE LEASING COMPANY, LLC fully complies with this program.

Supervisors

- Serve as the responsible person for all exposure control activities within their area of responsibility.
- Ensure that all employees comply with this program and report all non-compliance matters to the exposure control officer.

Employees

- Be aware of specific job tasks, situations and environments that may present biohazards.
- Comply with all parts of this program and report all non-compliance matters to the exposure control officer or your direct supervisor.
- Help RAWHIDE LEASING COMPANY, LLC prevent blood or potentially infectious material exposure by working safely and practicing good personal hygiene.

Procedure

Exposure Control Plan Access

Employees shall have access to a copy of the exposure control plan by request from their supervisor or the safety manager who will supply it in a reasonable time, place and manner.

Procedure Reviews and Updates

The exposure control procedure must be reviewed on an annual basis and updated whenever a new procedure, activity or function with the potential to expose employees to biohazards is introduced into a worksite.

Universal Precautions

RAWHIDE LEASING COMPANY, LLC and its employees shall observe universal precautions by treating all human blood and certain human body fluids as if they are known to be infectious for HIV, HBV and other pathogens even under circumstances where exposure is highly unlikely.

Exposure Controls

Exposure controls are designed to reduce or eliminate employee exposure to blood or potentially infectious materials and should be re-evaluated and revised if necessary on a regular basis to maximize their effectiveness in controlling employee exposure. Therefore:

- Hand washing facilities are readily available at all work locations except those that cannot support or simply do not have such facilities. In these cases, appropriate antiseptic solutions and / or towelettes are available for use.
- All sharps containers shall have a biohazard-warning label or a specific color to identify it as a biohazard, shall be resistant to punctures and shall be leak proof. The same characteristics shall apply to all secondary sharps containers.

Safe Work Practices

Safe work practices are designed to support exposure controls and further minimize or eliminate occupational exposure. Therefore:

- Employees must wash hands and other applicable body parts as soon as potentially contaminated gloves or other PPE are removed to further prevent contamination.
- If any part of the body has contact with blood or any other infectious material, employees must wash hands and other exposed body parts with soap and water immediately.
- Only trained and authorized personnel are allowed to handle sharps, sharps containers and any other potentially sharp and infectious needles or equipment.
- Activities such as applying make up, handling contact lenses, smoking or any other hand and eye, mouth, nose, ear or other body part contact is prohibited in areas where exposure to biohazards is possible.
- Storage areas such as pantries, freezers, refrigerators and others that may contain potentially infectious materials shall not contain food or drink.
- All equipment and surfaces that have had contact with blood or other infectious materials must be properly cleaned and decontaminated.
- All biological specimens must be contained in leak proof containers for handling, storage and transport to minimize potential contact with other surfaces and employees.
- In cases where the exterior surface of the specimen container is contaminated; the container must be placed into another leak proof container, which shall be labeled as "for handling and storage".
- All emergency responder, first aid or other potentially infectious supplies must be disposed of immediately and appropriately after contamination.

Personal Protective Equipment (PPE)

PPE shall be provided by RAWHIDE LEASING COMPANY, LLC at no cost to the employee and must be of proper fit, adequate for the task at hand and readily available. Defective or damaged PPE must be discarded / replaced or repaired in order to ensure maximum effectiveness.

The following safe work practices shall be followed with regard to biohazards and PPE:

- Protective garments that are penetrated by blood or other infectious materials must be removed and properly disposed of immediately.
- PPE that may be contaminated must be removed and properly stored / contained before leaving the work area.
- PPE such as protective gloves must be worn whenever contact with potentially infectious material exposure is anticipated.

- Disposable PPE such as rubber gloves must be replaced as soon as practical when contamination has occurred or when they are rendered ineffective by a tear, puncture or other occurrence.
- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
- Whenever infectious material splashes, sprays or other similar occurrences are possible, PPE such as face shields, goggles, head garments or other appropriate PPE shall be used to protect face, eyes etc.
- Adequate PPE must be used unless temporarily declined by the employee and approved by the safety manager.
- PPE should be cleaned, laundered & properly disposed of if contaminated.
- All PPE must be cleaned, maintained, used, stored and disposed of properly when applicable.

Post-Exposure Requirements

All potential blood or infectious material exposure incidents shall be investigated by RAWHIDE LEASING COMPANY, LLC thoroughly to ensure that hazards are abated and that affected employees receive the necessary treatment needed to minimize the impact of potential or actual exposure.

All reported exposure incidents shall be formally investigated by the exposure control officer / safety manager or supervisor when the safety manager cannot be present. A detailed report of the incident outlining root cause, corrective actions and the current status of affected employees is then completed and reviewed by RAWHIDE LEASING COMPANY, LLC to help prevent re-occurrence. Additionally, the following confidential information shall be provided to exposed employees:

- All documentary reports and information of the exposure incident and its circumstances.
- The identity of the exposure source individual unless applicable laws prevent such identification.

Upon completion of the above procedures, the exposed employee shall be appointed to a qualified healthcare professional who will evaluate the exposed employee, provide information to the employee about his or her medical status and initiate treatment where applicable.

RAWHIDE LEASING COMPANY, LLC provides the following information to the healthcare professional:

- A copy of the biohazards standard.
- A detailed description of the exposure incident.
- Additional information that is relevant to the healthcare professional.

The following information will be provided to RAWHIDE LEASING COMPANY, LLC by the healthcare professional as a “written report” and copied to the exposed employee upon completion of the healthcare professional’s evaluation of exposed employee:

- If a Hepatitis B vaccination is recommended for the exposed employee.
- If the exposed employee has received the Hepatitis B vaccination since the incident.
- Verification that the exposed employee has received results information of the medical evaluation.
- Verification that the exposed employee was made aware of medical conditions caused by the exposure incident that require additional medical evaluation or treatment.

* All other medical information remains confidential and will not be a part of the written report.

* The Hepatitis B vaccine will be made available to all employees with occupational exposure at no cost.

Training

All employees with occupational exposure shall receive bloodborne pathogens training before initial assignment and within 1 year of previous training. The training includes but is not limited to:

- A detailed explanation of bloodborne pathogens and their causes / effects.
- OSHA's bloodborne pathogens standard and requirements.
- How to protect yourself from occupational exposure.
- Common warning methods such as signs, labels, etc.
- Availability of the Hepatitis B vaccine.

Recordkeeping

RAWHIDE LEASING COMPANY, LLC shall meet OSHA 29 CFR 1920.1020(h) transfer of records standards in order to ensure regulatory compliance. Applicable records related to this standard and program shall be available to RAWHIDE LEASING COMPANY, LLC employees and regulatory authorities upon request except for medical records, which are kept confidential and require the employee's written consent unless otherwise specified in 29 CFR 1910.1030 or other applicable laws.

Medical records shall be maintained in a safe and secure location for the duration of each employee's employment plus 30 years. The following information must be included for each employee's medical record:

- Full Name
- Social Security Number
- Hepatitis B vaccination status
- Hepatitis B vaccination date(s)
- Hepatitis B declination(s)
- All records, notes, evaluations, etc. to and from the healthcare professional
- All RAWHIDE LEASING COMPANY, LLC documentary records, notes, letters and other forms of communications

All training records must be kept for no less than 3 years from the date of training. Training records shall include the following:

- All training materials and content used at time of training.
- Training instructor name and title.
- Training student names, titles and training dates.

Labelling

Labels depicting the universal biohazard warning shall be used on all containers used to dispose of contaminated or potentially contaminated materials. Defacing or modifying these labels is prohibited. Labels that are found to be defective or inadequate shall be replaced with new and effective labels.

EXPOSURE INCIDENT CHECKLIST

This checklist must be completed and maintained in the event that occupational exposure occurs.

	ACTION TO BE TAKEN BY EMPLOYER	COMPLETION DATE
<input type="checkbox"/>	Required incident documentation has been provided to affected employee(s)	
<input type="checkbox"/>	Exposure source individual has been identified	
<input type="checkbox"/>	Arranged for affected employee to see healthcare professional	
<input type="checkbox"/>	Required documentary information has been sent to the healthcare professional	

*** Post-Exposure Requirements**

All potential blood or infectious material exposure incidents shall be investigated by RAWHIDE LEASING COMPANY, LLC thoroughly to ensure that hazards are abated and that affected employees receive the necessary treatment needed to minimize the impact of potential or actual exposure.

All reported exposure incidents shall be formally investigated by the exposure control officer / safety manager or supervisor when the safety manager cannot be present. A detailed report of the incident outlining root cause, corrective actions and the current status of affected employees is then completed and reviewed by RAWHIDE LEASING COMPANY, LLC to help prevent re-occurrence. Additionally, the following confidential information shall be provided to exposed employees:

- All documentary reports and information of the exposure incident and its circumstances.
- The identity of the exposure source individual unless applicable laws prevent such identification.

Upon completion of the above procedures, the exposed employee shall be appointed to a qualified healthcare professional who will evaluate the exposed employee, provide information to the employee about his or her medical status and initiate treatment where applicable.

RAWHIDE LEASING COMPANY, LLC provides the following information to the healthcare professional:

- A copy of the biohazards standard.
- A detailed description of the exposure incident.
- Additional information that is relevant to the healthcare professional.

The following information will be provided to RAWHIDE LEASING COMPANY, LLC by the healthcare professional as a “written report” and copied to the exposed employee upon completion of the healthcare professional’s evaluation of exposed employee:

- If a Hepatitis B vaccination is recommended for the exposed employee.
- If the exposed employee has received the Hepatitis B vaccination since the incident.
- Verification that the exposed employee has received results information of the medical evaluation.
- Verification that the exposed employee was made aware of medical conditions caused by the exposure incident that require additional medical evaluation or treatment.

* All other medical information remains confidential and will not be a part of the written report.

* The Hepatitis B vaccine will be made available to all employees with occupational exposure at no cost.

CAL OSHA HEAT

Purpose

The purpose of this program is to reduce risks associated with heat illnesses in the work environment.

Scope

The scope of this program extends to all tasks performed in heat exposed environments.

Definitions

“Acclimatization” refers to the gradual process the body goes through when a person is exposed to heat on a consistent basis. The acclimatization peaks within four to fourteen days for most people with at least two hours of exposure to heat each day.

“Heat Illness” is a serious medical condition caused by the body’s failure to handle a particular amount of heat. Signs of heat illness include cramps, heat exhaustion, fainting and heat stroke.

The “preventative recovery period” is the time it takes the body to recover from heat exposure in order to avoid heat illness.

“Shade” refers to the blocking of sunlight. Shade can be provided by canopies, umbrellas, and temporary structures designed to block out or minimize direct sunlight. Shade is sufficient when objects in the shaded area do not cast a shadow. Shade is inadequate when it does not allow the body to cool. For instance, a car parked in the sun does not provide adequate shade, unless the air conditioning is also used to assist with cooling the body.

Requirements

The responsibility of carrying out and maintaining the Heat Illness Program belongs to managers and supervisors. Physical work factors that may contribute to heat related illnesses shall be taken into consideration prior to performing a task. Additionally, supervisors must take personal factors into consideration prior to assigning a task where heat related illnesses are probable.

Access to Water

All employees will have access to safe and potable drinking water. Where there is no plumbing or continuous supply of water, it will be provided, in sufficient quantities, at the beginning of the employee’s shift.

Access to Shade

All employees will have access to shade. Employees believed to be suffering from heat illness, or believed to be in need of a recovery period, will be provided a shaded area. The shaded area will be open to the air, ventilated or cooled. Access to shade will be permitted at all times. For more information, refer to definition of “Shade”.

Control Measures

Each work location that is involved in working in heat exposed environments will set forth procedures to control the effects of environmental factors that may contribute to heat illness. The most common of these factors are temperature, air circulation, humidity, and exposure to radiant heat sources; while controls shall include proper PPE, engineering controls and administrative controls as outlined in this program.

Physical factors that may induce heat related illness must be considered before a task is performed. Common physical factors include level and duration of physical activity, type of work and clothing factors such as color, breath-ability and weight.

Supervisors must consider personal factors that may contribute to heat illness before assigning tasks where heat related illness may occur. These factors include weight, level of fitness, age, prior heat related illnesses and use of drugs or alcohol.

The following measures shall be in place to control the effects of environmental factors that can contribute to heat related illnesses. Each work site will develop procedures specific to the site, but will include these minimums:

- At least 2 quarts of water per employee must be provided at the beginning of the shift.
- Supervisors or other designated personnel will check the water containers every 30 minutes.
- Employees are encouraged to report low water levels or dirty water to the supervisor or designee,
- Supervisors will frequently encourage employees to drink water,
- Short meetings will be held every morning to remind workers to drink water frequently throughout the duration of the shift during hot weather,
- Water containers will be placed as close as possible to workers,
- Water will be replenished when levels of drinking water fall below 50%
- Disposable drinking cups will be provided to workers or workers will be provided with their own cups daily,
- Umbrellas, canopies or other shade devices will be set up by supervisors at the beginning of the shift and will be relocated to be closer to the workers, as needed,
- Those that employ non-agricultural workers are permitted to use other cooling measures provided that the measures are proven to be as effective as shade.

When possible, working hours may be adjusted to work during cooler times of the day.

If modified hours or a shorter work shift are not possible, workers will be provided with more water and more frequent rest breaks.

Supervisors will monitor all workers and be aware of the onset of heat related symptoms.

Cell phones or other immediate means of communication will be provided to supervisors to ensure that emergency services can be reached, if necessary. Supervisors shall ensure the functionality of these devices at the designated worksite prior to the beginning of the shift.

Workers will be reminded every morning of the worksite address and directions to the site to inform first responders in case of emergency.

All new hires will be assigned a buddy to ensure that training and RAWHIDE LEASING COMPANY, LLC procedures are understood and followed.

Training

Training on the following topics will be provided to all employees:

- Environmental, physical and personal factors that contribute to heat illness,
- The importance of water consumption, frequently and in small quantities, throughout the duration of the shift when the work environment is hot and workers are sweating more than usual while working,
- The significance of the process of acclimatization,
- Types of heat illness and the associated signs and symptoms,
- The importance of reporting to the supervisor or employer when signs or symptoms of heat illness are present in themselves or in another worker,
- Procedures set forth for responding to symptoms of heat illness, including the processes for providing emergency medical services, should those measures be necessary,
- Procedures for contacting emergency services and/or for transporting workers to a place that can be reached by emergency responders,

- Procedures to ensure that simple and accurate directions to the site can be provided to emergency responders.

It is mandatory that supervisors receive training in the prevention and detection of heat related illnesses prior to supervising workers. Supervisors must also be trained in all heat illness emergency response procedures.

Training will be provided on RAWHIDE LEASING COMPANY, LLC heat illness procedures to prevent heat illness and the procedures to follow when heat illness is suspected.

Communication regarding these policies will be provided in an easily understandable format to all affected employees.

RAWHIDE LEASING COMPANY, LLC will make certain that all outdoor workers, including temporary workers, have been trained in the prevention and detection of heat illness.

CAL OSHA IIPP

Responsibility

The Safety Manager acts as the Injury and Illness Prevention Program (IIP Program) administrator, who has the authority, responsibility and overall accountability for the comprehensive implementation of this program.

Managers and Supervisors are to implement and maintain the IIP program in the work area and answer all employee inquiries about the IIP. Each manager and supervisor will have a copy of this IPP program.

Compliance

- Management holds the responsibility of ensuring that all safety and health related policies and procedures have been communicated to all employees and that the employees understand all information provided to them.
- All rules will be enforced fairly and uniformly by both managers and employees.
- Employees will comply with the IIP programs by providing incentives, training, retraining and disciplinary programs.

The systems used to ensure all employees comply with rules to maintain a safe work environment include:

- Providing employees with the provisions of the IIP Program,
- Making sure that the safety of each employee's work is properly evaluated,
- Recognizing those employees who engage in safe and healthful work practices,
- Training employees who fail to adhere to safety performance guidelines,
- Taking disciplinary action against employees who fail to comply with the safety guidelines.

Communication

Open, two-way communication between management and employees concerning health is required to have a workplace that is both productive and free from injury.

The system of communication as outlined below will facilitate an uninterrupted flow of health and safety information between management and employees in a manner that is easy to understand.

The communication system should be comprised of the following elements:

- New hire orientation will provide new employees with the proper information about safety and health policies and procedures,
- IIP Programs, workplace safety and health training programs will be regularly reviewed with the staff,
- Safety meetings will occur on a regularly scheduled basis,
- Employees and supervisors will effectively communicate safety and health concerns,
- Safety information will be posted in visible areas and/or distributed,
- A system must be implemented so that employees can report safety and health problems or hazards effectively and anonymously without fear reprisal or reprimand,

When required, a labor and management safety committee will meet on a regular basis:

- A written record of the health and safety committee meetings will be composed and retained,
- The committee will review results of scheduled periodic inspections, investigation reports of accidents and exposures, and alleged hazardous conditions,
- The committee will make recommendations to prevent future accidents and exposures, in addition to recommending ways to implement employee's safety suggestions.

Periodic inspections to assess identified workplace hazards will be performed by competent observers in the following workplace areas:

- The Project Manager or Safety Representative shall serve as inspector, and provide daily safety review of the project sites.
- A Safety Group or Committee will be responsible for performing safety evaluations of the project sites on an as needed basis.

Periodic inspections involve the identification and assessment of workplace hazards. Applicable documentation must be used, along with other methods that have been deemed effective in the identification and evaluation of workplace hazards.

Periodic inspections are to be conducted according to the following:

- Any time that potentially hazardous substances, procedures or equipment is introduced into the workplace,
- When previously unidentified hazards are recognized,
- Whenever a work-related injury or illness occurs,
- When employees (both temporary and permanent) are hired or reassigned to processes, operations or tasks that have yet to undergo a hazard evaluation,
- Any time the company feels that workplace conditions warrant an inspection.

Accident and Exposure Investigations

The following procedures will be implemented to investigate workplace accidents and possible substance exposures:

- The accident scene must be visited as soon as possible,
- Injured workers and witnesses will be interviewed,
- The cause of the accident and/or exposure will be determined,
- Corrective actions will be taken to prevent recurrence of the accident or exposure,
- The findings of the investigation will be documented and the appropriate corrective actions will be taken.

Training and Instruction

Employees, managers, and supervisors must have training and instruction in both general and job specific safety and health practices before or at the time of their initial job assignments.

Training and instruction will be provided as follows:

- At the time when the IIP Program is first established,
- For every new employee as they undergo training,
- Employees who are in construction are provided training through a Cal/OSHA approved construction industry occupational safety and health training program,
- All employees that have new job assignments for which they have not been previously trained,
- When new substances, processes, procedures and/or equipment that poses new hazards are introduced to the workplace,
- When the employer has been advised of a new or previously unidentified hazard.

All supervisors will have training to familiarize them with the health and safety hazards that pose potential risks to workers who are under their immediate direction and control.

Every employee will have training about the particular hazards involved in their job assignment.

Workplace safety and health training practices for all industries include, but are not limited to, the following:

- Disclosure of the employer's IIP Program, action plan for emergencies, fire prevention plan and methods for reporting injuries as well as unsafe working conditions and practices,
- Proper use of protective clothing including gloves, footwear and personal protection equipment,
- Disclosure of the chemical hazards to which employees may be potentially exposed, along with other hazard program information,
- The location of toilets, hand washing stations and water drinking facilities,
- The provision of medical services, first aid and emergency procedures,
- Specific instruction to all employees about hazards that are unique to their job assignment, in instances where the information was not provided in other training.

Record Keeping

The following steps have been taken to implement and maintain the IIP Program:

- Records of hazard inspections detailing the person(s) who conducted the inspections, the unsafe conditions and work practices that have been identified and the corrective action implemented to ameliorate the unsafe conditions and work practices, all of which is recorded on the hazard assessment and correction forms,
- Documentation of safety and health training for each employee, including the names of each employee, the dates of training, the type of training and the training providers,
- Employee training provided by provided by a construction industry occupational safety and health training program approved by Cal/OSHA, which shall be documented in the record,
- Inspection records and training documentation will be maintained for one year , except for those employees that have worked for less than one year.

Hazard Correction

Based upon the severity of the hazard, unsafe or unhealthy work conditions will be corrected in a timely fashion according to the following procedures:

- When an imminent hazard exists that cannot be abolished immediately without posing risk to employees and/or property occurs, employees are to be removed from the area. Only those employees who are needed to correct the condition are exempt,
- Those employees needed to correct the hazardous condition will be provided with the required protection equipment,
- All actions and dated of completion will be documented on the designated forms.

DISCIPLINARY PROGRAM

Purpose

The purpose of this program is to establish disciplinary action procedures that encourage compliance with RAWHIDE LEASING COMPANY, LLC safety programs and other safety & health efforts made by RAWHIDE LEASING COMPANY, LLC.

Scope

This program applies to all RAWHIDE LEASING COMPANY, LLC work sites and employees regardless of employment duration or position within the RAWHIDE LEASING COMPANY, LLC.

Responsibilities

Safety Manager

- Responsible for the implementation and enforcement of this program.
- Ensure that disciplinary actions are adequate enough to ensure program effectiveness.
- Be conduct disciplinary action procedures in accordance with this program.

Supervisors

- Assist the safety manager in enforcing this program.
- Ensure that employees are aware of what constitutes a safety violation and follow on actions.
- Report all safety violations to the safety manager who will determine what action items should follow the violation.
- Support the safety manager in disciplinary action procedures.

Employees

- Comply with all parts of this program.
- Help prevent incidents by reporting safety violations to your supervisor.
- Formally report any disciplinary / corrective actions that you believe are unfair or discriminatory to your supervisor immediately.

* Physical inspections of work areas will be performed regularly by RAWHIDE LEASING COMPANY, LLC officials who will report suspected safety violations where applicable.

Requirements

Employee safety is extremely important to the owners and management of RAWHIDE LEASING COMPANY, LLC. Not following safety rules or procedures in considered unacceptable and complying with RAWHIDE LEASING COMPANY, LLC safety programs, rules and procedures is mandatory. Safety violations include but are not limited to:

- Intentional disregard of safety rules, procedures or guidelines required by RAWHIDE LEASING COMPANY, LLC or it's clients
- Horseplay or other actions that compromise safety and health
- Non-compliance with PPE program requirements or other written RAWHIDE LEASING COMPANY, LLC requirements
- Using or possessing alcohol or illegal drugs during work hours or on RAWHIDE LEASING COMPANY, LLC premises
- Possessing firearms or other weapons while on RAWHIDE LEASING COMPANY, LLC premises
- Not reporting incidents as required by RAWHIDE LEASING COMPANY, LLC

- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.
- Harassing, threatening or otherwise putting the health and safety of other employees at risk.

Procedure

The following disciplinary action procedures shall be applied after a safety violation notice has been issued:

- 1st Safety Violation: The first safety violation will result in a verbal warning. However, a copy of the safety violation notice shall be issued and kept on record for the duration of the employee's employment. The supervisor or safety manager shall inform the employee of which safety rules or procedures were violated and recommend corrective actions or actions to prevent re-occurrence. The employee's direct supervisor and or other applicable persons shall also be notified of the violation and shall receive a copy of the safety violation notice.
- 2nd Safety Violation: The second safety violation shall result in a written disciplinary action form and possible training on the safety violation subject matter. The disciplinary action form shall include the issue date, name and signature of employee, name and signature of supervisor, violation number, violation description and disciplinary / corrective actions which were taken or are to be taken.
- 3rd Safety Violation: The third safety violation shall result in another disciplinary action form but must include temporary layoff for a duration which shall be determined in collaboration between the safety manager, supervisor and / or other applicable personnel. The severity of the violation is to be considered when disciplinary action is applied.
- 4th Safety Violation: The fourth safety violation shall result in termination of employment unless there is a compelling reason to retain the employee which is to be determined by the safety manager, supervisor and other applicable personnel.

* The affected employee may submit a written rebuttal at anytime before, during or after the disciplinary period.

* Safety violations shall expire 12 months after the date of occurrence.

* All disciplinary actions are subject to change based on the severity or degree of negligence. For example, if an employee physically harms another employee, intentionally commits an unsafe act that results in harm, potential harm, damage or potential damage that places RAWHIDE LEASING COMPANY, LLC or it's employees at significantly higher level of risk or results in losses that are considered serious; the employee could be terminated without having multiple safety violations. Therefore, the degree of disciplinary action will often be determined on a case-by-case basis and will vary depending on the violation severity or effects of the violation.

Recordkeeping

All safety violation documentation shall be kept on file for 2 years after his or her employment is terminated. In cases where the disciplined or terminated employee claims discriminatory or unfair disciplinary / corrective action or termination; the employees entire employee file (including all safety violation documentation) shall be kept for 3 years after his or her employment is terminated.

WARNING!
Safety Violation Notice

Issue Date: _____

Employee Name: _____

Supervisor Name: _____

Department: _____

Violation No: _____

Violation Description: _____

Issued by: _____

Employee Signature: _____

Supervisor Signature: _____

Safety Violation / Disciplinary Action Form

Issue Date:	Issued By:	Issued To:	Department:	Violation No:
Violation Description:				
Disciplinary / Corrective Actions:				
Additional Comments:				

Employee Signature: _____

Supervisor Signature: _____

DRIVING SAFETY

Purpose

The purpose of this program is to provide managers, employees and their supervisors with the regulatory requirements necessary for compliance for operation, management and safety of RAWHIDE LEASING COMPANY, LLC vehicles.

Key Responsibilities

RAWHIDE LEASING COMPANY, LLC's safety manager is in charge of ensuring that the details of this program are followed by all employees; the outline for the driving safety program shall be stored in the office of the safety manager.

RAWHIDE LEASING COMPANY, LLC's site manager is responsible for the application and follow-through of this program on site, while making sure that vehicles conform to the outlined plan.

In addition to being knowledgeable in the general procedures outlined in RAWHIDE LEASING COMPANY, LLC's vehicle safety policy, employees are responsible for adhering to said policies and for reporting any unsafe vehicle conditions.

Only authorized employees shall operate on and off-road motor vehicles.

Vehicle and Transportation Related

Safe Driving Practices

In order to drive a particular RAWHIDE LEASING COMPANY, LLC or client vehicle, employees must possess a valid driver's license for that particular vehicle, have prior authorization to drive a RAWHIDE LEASING COMPANY, LLC-owned vehicle, possess at least three years of experience operating that type of vehicle and received recent evaluation and training for that vehicle.

In addition to these practices, the following rules must be followed:

- Reversing a vehicle is forbidden in most circumstances, as drivers should make every effort to park a vehicle so that they can drive forward when leaving,
- Ensure that vehicles are of correct size and designed for the intended use,
- When reversing an automobile, if the vehicle does not have a reversing alarm, the driver should walk around the back of the vehicle or use a spotter before backing,
- Delivery trucks should not carry any passengers,
- All storage areas within a vehicle are to be free of any loose materials, in case of an accident,
- Any open cargo holds should be covered with a net or netting equivalent,
- No alterations shall be made to vehicles without prior authorization from the vehicle's manufacturer,
- Any signs or stickers placed on the vehicle should not impair the driver's field of vision or operation of the controls.

Employees driving vehicles are required to follow safe driving practices:

- All laws, both local and federal, must be followed along with any client requirements,
- Always stay focused on the road and keep both hands on the wheel,
- Drive defensively, so that conditions and potential hazards are being continually assessed,
- No electronic devices may be used while operating a vehicle. The vehicle must be parked for a driver to use a cell phone or two-way radio,
- Posted speed limits shall never be exceeded,
- Any traffic warnings, citations, collisions, near-collisions or vehicle damage must be immediately reported

- to the supervisor,
- Any changes to an employee's driving status must be reported to the supervisor,
- Seat belts must be worn by all passengers while the vehicle is moving; passengers may only use seats that are equipped with the proper seatbelt (three-point inertial-reel model belts),
- Drive slowly upon entering construction areas and in areas where encounters with large vehicles or wildlife are likely,
- Drive cautiously in hazardous driving conditions like rain, snow, fog or sleet. If necessary, drive for the conditions and under the recommended speed limit,
- Employees are forbidden to drive under the influence of alcohol, illegal drugs, or prescription and over-the-counter medications that may inhibit their driving. Also, alcohol and illegal drugs should never be in leased or RAWHIDE LEASING COMPANY, LLC or client owned vehicles.

Drivers are to be prepared before leaving:

- The driver must be well-rested and fully alert in order to operate a RAWHIDE LEASING COMPANY, LLC vehicle,
- Drivers should check their vehicle for damages and immediately report any new damage to the supervisor,
- Check for windshield damage that might impair the driver's field of vision,
- Remove all dirt, snow and ice from the vehicle's lights and windows so that there is nothing blocking the driver's view,
- Make sure there is enough fuel in the gas tank to reach your destination. Other than adding fuel and other necessary fluids, drivers are not permitted to perform any kind of maintenance or repairs,
- Check the license plates and inspection tag on the automobile to ensure that both are current,
- Double check to make sure that RAWHIDE LEASING COMPANY, LLC vehicle is equipped with a first-aid kit and an inspected fire extinguisher.

Vehicle Requirements:

- All vehicles will be maintained in safe working order,
- Any vehicle weighing less than 1000 kg is not allowed on public roads,
- Vehicles with a restricted rear view (such as a fully loaded pickup truck) or that are longer than 20 feet (6 meters) must be equipped with an audible reversing alarm,
- Every seat must have a head-rest,
- Every light-duty vehicle, including buses, must come with adjustable left, right and center rear view mirrors,
- All loads must be secured and are not to exceed either the manufacturer's specs or the legal limit for the automobile,
- All vehicles will have rollover protection installed, in compliance with the industry standard regulatory practices,
- Every light equipment vehicle must be equipped with two high-intensity lights. These high-intensity lights must be located as high, as far apart and as far back as possible. The lights will be wired to the headboard switch, and will have their own override switch, should local regulations allow it.

Regarding Tires:

- Tires, including a full-sized spare, must be of the same make, model and tread patterns. The only exception to this rule is when the automobile or tire manufacturer recommends a different type of tire for particular axles,
- The vehicle's equipped tires are the ones recommended by the automobile or tire manufacturer,
- All vehicles must carry a spare tire and the equipment necessary to safely change a tire.

All vehicles must come equipped with:

- A fire extinguisher that has a capacity of least 0.9 kg or 2 lbs,
- The fire extinguisher must be mounted securely in a location that is easily accessible in case of an emergency, and where it won't become a hazard itself in case of an accident,
- A first-aid kit that is stored in a safe and secure place,
- A high-visibility jacket to use if there is an emergency,
- At least one hazard warning triangle.

Transportation

- Whenever an employee is assigned to drive a RAWHIDE LEASING COMPANY, LLC vehicle, RAWHIDE LEASING COMPANY, LLC must make sure that the driving conditions, including the roads, weather and traffic, are safe for the employees,
- Before an employee can drive a RAWHIDE LEASING COMPANY, LLC vehicle, the employee must ensure that the vehicle has been properly inspected,
- Both drivers and passengers must be wearing seat belts while the vehicle is in motion,
- Passengers must be seated and all body parts must remain inside the vehicle at all times, unless doing so is essential to an employees work and then, only if the worker is properly restrained,
- Tools and other materials must be securely stored inside of a compartment to prevent injury to the driver or passengers.

DRUG AND ALCOHOL POLICY

PURPOSE

It is the objective of RAWHIDE LEASING COMPANY, LLC to:

- Promote, provide and maintain a safe working environment for its employees and employees of its affiliates or subsidiaries.
- Protect RAWHIDE LEASING COMPANY, LLC property.
- Cooperate with customers in their efforts to establish a safe, drug and alcohol free work environment.
- Comply with contractual obligations and existing Federal regulations.

RAWHIDE LEASING COMPANY, LLC PREMISES

For the purpose of this Policy, the term “premises” refers to RAWHIDE LEASING COMPANY, LLC premises, its affiliates or subsidiaries and includes all property, facilities, land, platforms, buildings, structures, fixtures, installations, automobiles, truck and other vehicles and equipment – whether owned or leased. This policy also includes any other work location, parking lots or mode of transportation to and from locations while in the course and scope of RAWHIDE LEASING COMPANY, LLC employment and/or business.

POLICY STATEMENT

Being under the influence of drugs and/or alcohol, or possessing any firearms while working or while on RAWHIDE LEASING COMPANY, LLC premises is strictly prohibited. The unauthorized use, possession, sale, transfer, storage or manufacture of illegal substances or drug paraphernalia; the abuse of legal drugs; or the unauthorized use, possession or sale of alcoholic beverages by an employee of RAWHIDE LEASING COMPANY, LLC is strictly prohibited. No

RAWHIDE LEASING COMPANY, LLC employee will report to work, enter RAWHIDE LEASING COMPANY, LLC premises, or conduct RAWHIDE LEASING COMPANY, LLC business under the influence of illegal/controlled substances or alcohol. “Under the influence” means:

A sufficient amount of a substance is in the employee’s system to produce a positive test result

The employee is exhibiting erratic abnormal behavior posing a risk to the employee and/or others.

Compliance to this policy, including consent to searches and medical testing, is a condition of employment. Employees have the right to refuse to cooperate with RAWHIDE LEASING COMPANY, LLC medical testing and search requirements. However, refusal to permit such searches and/or medical testing will be grounds for termination.

Illegal drugs, unauthorized controlled substances, look-a-likes, designer and synthetic drugs (including the presence of any detectable amount in the employee while working), and any other drugs or abnormal substances which may affect an employee's senses, motor functions or alter a person's perception while working are strictly prohibited.

Alcoholic Beverages - under no circumstances will alcoholic beverages be brought onto RAWHIDE LEASING COMPANY, LLC property or consumed while on RAWHIDE LEASING COMPANY, LLC premises.

Drug paraphernalia and other unauthorized items may not be brought onto RAWHIDE LEASING COMPANY, LLC premises under any circumstances.

Firearms, Weapons, and Ammunition may not be brought onto RAWHIDE LEASING COMPANY, LLC premises under any circumstances.

Prescription Drugs may not be brought onto RAWHIDE LEASING COMPANY, LLC premises - except under the following conditions:

- Employees shall have a valid medical prescription for any prescription drugs. If this medication can/does impair the employee's performance, the employee will immediately notify his/her supervisor or alternate member of management.
- The medication shall be in the employee's name in the original vial and have the doctor's name and prescription number on the label.
- Each prescription shall not be older than one year of the date issue.
- Employees shall only possess enough medication for the normal work shift.
- NOTE: RAWHIDE LEASING COMPANY, LLC SHALL RESERVE THE RIGHT TO HAVE AN OUTSIDE PHYSICIAN DETERMINE IF A PRESCRIPTION DRUG OR MEDICATION INHIBITS EMPLOYEE PERFORMANCE. RAWHIDE LEASING COMPANY, LLC SHALL RESTRICT THE USE OF ANY SUCH DRUG OR MEDICATION WHILE ON RAWHIDE LEASING COMPANY, LLC PREMISES OR CONDUCTING RAWHIDE LEASING COMPANY, LLC BUSINESS. THIS SHALL ALSO INCLUDE RESTRICTING THE EMPLOYEE'S WORK ACTIVITY OR PRESENCE AT THE CUSTOMER'S WORK SITE.

EMPLOYEE ASSISTANCE PROGRAM

The Employee Assistance Program will include displaying/providing a list of community service hot-line numbers, and distributing informational material on drug use, chemical dependency and RAWHIDE LEASING COMPANY, LLC Alcohol, Firearms and Controlled Substance policy.

- All Management and supervisory personnel who will determine whether an employee should be tested for prohibited drug use based upon reasonable cause will receive a minimum of sixty (60) minutes of training. This training will provide instruction on the specific and contemporaneous physical, behavioral and performance indicators of probable prohibited drug use.
- All employees will participate in an informational session structured to give the participants; (1) an understanding of the effects/consequences of substance abuse/dependency on personal safety, health and work environment and (2) an understanding of the substance abuse regulations (DOT, USCG).
- All Employee Assistance Program training will be documented and kept on file.

ACKNOWLEDGMENT

Employees shall acknowledge that compliance with this policy is a condition of employment.

DRUG TESTING PROCEDURE

Personnel may be tested for drugs and/or alcohol by any accepted method to include but not limited to urinalysis and/or blood testing:

- During the pre-employment physical.
- Randomly, whenever random testing is in effect.
- Upon reasonable cause as determined by a competent person.
- When any injury, accident or incident occurs that may create reasonable suspicion that drugs and/or alcohol may have been involved.
- Refusal to take a test for the presence of drugs and/or alcohol will result in disciplinary action to include termination.

UNACCEPTABLE RESULTS

Employees with unacceptable test results shall be prohibited from working on client / host sites or facilities.

ELECTRICAL SAFETY AWARENESS

Purpose

The purpose of this program is to establish RAWHIDE LEASING COMPANY, LLC safe work practices for electrical tools, equipment and their related components.

Scope

The scope of this program covers all permanent and temporary RAWHIDE LEASING COMPANY, LLC employees and RAWHIDE LEASING COMPANY, LLC contractors while working on RAWHIDE LEASING COMPANY, LLC owned sites. If RAWHIDE LEASING COMPANY, LLC does not own a particular site; the site owner's program shall be used on that site unless the site owners' program is less stringent.

Responsibilities

Safety Manager

- Develop electrical safety programs & procedures in accordance with regulatory standards and as required by each individual site.
- Ensure that RAWHIDE LEASING COMPANY, LLC employees fully comply with this program.
- Ensure that no unqualified employees work on energized electrical circuit equipment or their parts.

Supervisors

- Ensure that only qualified employees and / or qualified contractors perform electrical repairs and installations.
- Ensure that electrical programs and procedures address site specific hazards or hazards that are presented by unique circumstances at their respective areas of responsibility.
- Ensure that no unqualified employees work on energized electrical circuit equipment or their parts.

Qualified Employees

- Ensure that no unqualified employees work on energized electrical circuit equipment or their parts.
- Ensure individual familiarity with the use of special precautionary techniques, personal protective equipment, insulated tools, insulating materials and shielding materials.

Employees

- Ensure that only qualified employees work on energized electrical circuit equipment or other related parts.
- Report all potential electrical hazards to supervisors immediately.

Definitions

Class I hazardous locations - areas having the presence of *flammable gases or vapors* in the air, such as natural gas or gasoline vapor. When these materials are found in the atmosphere, a potential for explosion exists, which could be ignited if an electrical or other source of ignition is present. The Code writers have referred to this first type of hazard as *Class I*. So, a *Class I Hazardous Location* is one in which *flammable gases or vapors* may be present in the air in sufficient quantities to be explosive or ignitable. Some typical Class I locations are:

- Petroleum refineries, and gasoline storage and dispensing areas;

- Dry cleaning plants where vapors from cleaning fluids can be present;
- Spray finishing areas;
- Aircraft hangars and fuel servicing areas; and
- Utility gas plants, and operations involving storage and handling of liquified petroleum gas or natural gas.
- All of these are Class I . . . gas or vapor . . . hazardous locations. All require special Class I hazardous location equipment.

Class II hazardous locations - areas made hazardous by the presence of combustible *dust*. These are referred to in the Code as "Class II Locations." Finely pulverized material, suspended in the atmosphere, can cause as powerful an explosion as one occurring at a petroleum refinery. Some typical Class II locations are:

- Grain elevators;
- Flour and feed mills;
- Plants that manufacture, use or store magnesium or aluminum powders;
- Producers of plastics, medicines and fireworks;
- Producers of starch or candies;
- Spice-grinding plants, sugar plants and cocoa plants; and
- Coal preparation plants and other carbon handling or processing areas.

Class III hazardous locations - areas where there are *easily-ignitable fibers or flyings* present, due to the types of materials being handled, stored, or processed. The fibers and flyings are not likely to be suspended in the air, but can collect around machinery or on lighting fixtures and where heat, a spark or hot metal can ignite them. Some typical Class III locations are:

- Textile mills, cotton gins;
- Cotton seed mills, flax processing plants; and
- Plants that shape, pulverize or cut wood and create sawdust or flyings.

Qualified Person - A person who currently trained in the operation, repair, maintenance, construction and implementation of electrical equipment and electrical hazards.

Circuit Breaker – An automatic switch that stops the flow of electric current in a suddenly overloaded or otherwise abnormally stressed electric circuit.

Disconnecting Means - A device or other means by which circuit conductors can be disconnected from a power supply.

Disconnecting Switch – A device, which is used to isolate a circuit or equipment from a power source.

Double Insulated Tool - Tools which are constructed using non-conductive materials that do not require grounded, 3 wire plugs.

Grounded Conductor - A conductor that is used to connect equipment or the grounding circuit of a wiring system to a grounding electrode or several grounding electrodes.

Ground Fault Circuit Interrupter (GFCI) - A device that interrupts the electrical circuit to the load when a fault current to the ground exceeds a predetermined value that is less than what is required to operate the over current protective device of the supply circuit.

Safe Work Practices

General

- All electrical equipment, tools and related components must be inspected prior to each use.
- Equipment, tools and related components, which are unserviceable or faulty, shall be removed from service and tagged appropriately with the date of inspection, the name of the inspecting employee and signature of inspecting employee.
- Only qualified personnel may repair electrical tools, cords and other related equipment.
- Only certified electricians may repair or conduct maintenance on electrical equipment and wiring systems.
- The site supervisor shall verify contract electrician credentials before work begins.
- Employees shall not wear conductive apparel such as rings, watches, etc. unless they are rendered non-conductive by covering, wrapping or other insulating means.
- When working on or near exposed de-energized parts, those parts shall be treated as live.
- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.
- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.
- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.
- Only approved, certified, electrical contractors may perform construction and service work on RAWHIDE LEASING COMPANY, LLC or client property.
- It is the Manager/Supervisors responsibility to verify the contractor's certification.
-

Extension Cords

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - All extension cords shall be plugged into one of the following:
 - A GFCI outlet;
 - A GFCI built into the cord;

- A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be remove from service and repaired or replaced.
- Extension cords shall not be used on compressor skid to operated heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment shall be hard wired per applicable electrical codes.

Illumination

- Employees shall not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.

Switches, circuit breakers, and disconnects

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labelled with the voltage rating.
- Each breaker within a breaker panel must be labelled for the service it provides.
- Disconnect switches providing power for individual equipment must be labelled accordingly.

Ladders

- Portable ladders must have non-conductive side rails.
- Ladders must be manufactured using non-conductive materials such as fiberglass or wood.
- Aluminum or metal ladders are strictly prohibited.
- Ladders shall be free of defects and defective components.
- Ladders shall be used per the manufacturers recommendations only.

Energized and Overhead High Voltage Power Lines & Equipment

- A minimum clearance of 10 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines shall be de-energized and grounded or other protective measures shall be provided before work is started.
- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.
- Minimum approach distance for qualified employees shall be followed per 29 CFR 1910.333(c)(3)(i) Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current). Approach distances are 10' for 50kV plus 4" for every additional 10kV.

Confined or Enclosed Work Spaces

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee shall isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

Enclosures, Breaker Panels, and Distribution Rooms

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures shall be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.

- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have “Danger: High Voltage – Authorized Personnel Only” posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

Lock Out/Tag Out

- No work shall be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with the live parts) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out shall be treated as live parts.
- Per RAWHIDE LEASING COMPANY, LLC policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using RAWHIDE LEASING COMPANY, LLC’s Control of Hazardous Energy – Lock Out/Tag Out Program. Lockouts are performed by the Safety Manager, Shop Foreman or Branch Manager. Designated employees in some branches may be trained by local management to lock out equipment. If live sources are to be worked it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.
- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow RAWHIDE LEASING COMPANY, LLC’s Control of Hazardous Energy – Lock out/Tag Out Program.
- Authorized personnel will be trained in lock out/tag out procedures.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

Fire Extinguishers

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

Electric Shock-CPR

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person’s heart has stopped or they are not breathing.
- Call for help immediately.

Electric Welders

- A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.
- A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

Equipment Grounding

- All gas compressors, air compressors, separators, vessels, etc. shall be grounded by means of using a lug and ground strap, nominal in size to a ½” bolt or larger, attached to a ground rod six feet or longer.

- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

Assured Grounding

OSHA requires that employers shall use either ground fault circuit interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

- RAWHIDE LEASING COMPANY, LLC shall use GFCI’s in lieu of an assured grounding program.

Ground Fault Circuit Interrupters

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords shall use a GFCI.
- Additionally, approved GFCI’s shall be used for 240-Volt circuits in the same service as described above.
- GFCI’s must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

Training

- All RAWHIDE LEASING COMPANY, LLC employees both temporary and full time shall be trained in electrical safety practices and procedures to minimize the risk of electrical shock.
- Unqualified employees who may be exposed to electric shock shall receive training and acquire familiarity with electric safety work practices.
- All RAWHIDE LEASING COMPANY, LLC employees both temporary and full time shall be trained in safety related work practices that pertain to their respective job assignments.
- Safe work practices shall be used to prevent electric shock or other related incidents as a result of energy source contact while working near or on energized equipment or circuits.
- In the event that RAWHIDE LEASING COMPANY, LLC employees qualified employees, those employees must adhere to the approach distances in Table S5 of CFR 1910.333.

Voltage Range (phase to phase)	Minimum Approach Distance
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm)
Over 750V, not over 2kV	1 ft. 6 in. (46 cm)
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm)
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm)
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm)
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm)
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm)

FIRST AID

Purpose

The program outlined in this document has been implemented to ensure adequate amounts of first aid equipment and supplies are available for employees and to put in place proper procedures for situations requiring first aid.

Scope

This program specifically applies to all of our employees regardless of where they are performing work unless otherwise notified by the safety manager and documented on the site-specific plan.

Responsibilities

Safety Manager

- Implement and ensure the requirements of this program are followed at all times,
- Will work in conjunction with The Red Cross or other applicable entities to make sure employees are up-to-date on applicable training requirements,
- Keep all records pertaining to this program in order and current.

Supervisors

- Ensure that first aid kits are made available and adequately stocked for each work site,
- Will make sure that provisions for prompt medical attention, including transportation in case of a serious injury, are in place before a project begins,
- Will provide adequate first aid supplies and equipment within easy reach when required,
- Ensure that access to emergency and medical phone numbers is available in a conspicuous place to all employees.

Employees

- Will follow the requirements of this program where applicable,
- Will use first aid supplies and equipment responsibly,
- Immediately notify the supervisor of any low first aid kit supplies,
- Know the location of emergency telephone numbers.

Requirements

First Aid Supplies and Equipment

First aid supplies and equipment must be available and easily accessible to employees at all times.

First aid kits will contain all appropriate items determined to be adequate for the environment in which they will be used.

First aid kits will be assessed periodically to ensure adequate amounts of first aid supplies are always available. Inadequate first aid kits must be reported to your immediate supervisor who will then have the kits restocked with adequate supplies prior to the start of the work shift.

The site supervisor shall perform an inspection of the first aid supplies on a weekly basis. Kits shall be replenished as needed by the site supervisor.

A safety shower, eye wash, and/or other suitable facilities for quick drenching or flushing shall be provided within the work area of any facility where the eyes or body of any person may be exposed to injurious corrosive

materials. Ensure expiration dates are checked for safety reasons and that the water used in storage devices is sanitized.

An assessment of the material or materials used shall be performed to determine the type of flushing/drenching equipment will be required at the job site. Portable or temporary stations must be set up prior to the use of corrosive materials on all client job sites.

Medical Response

All minor first aid is to be self-rendered. Because of the risks associated with certain blood-borne pathogens, no one is allowed to tend the minor injuries of another person.

A person who has a valid certificate in first-aid shall be available to render first aid, in the absence of an infirmary, clinic, hospital, or physician that is reasonably accessible in terms of time and distance to the worksite. It is mandatory that a valid certificate in first-aid training must be obtained from the U.S. Bureau of Mines, The American Red Cross or an equivalent training authority which can be verified by documentary evidence.

Universal precautions must always be observed when first aid is rendered by authorized employees with the proper training. (Universal Precautions means that the aid giver treats all bodily fluids as if they were contaminated).

If 911 is not available refer to the list of posted phone numbers for prearranged medical response providers. All authorized first responders of RAWHIDE LEASING COMPANY, LLC should have a cell phone as a means of communications; otherwise hand held radios or telephones shall be used as a means of communication.

Transportation

Based on the first responders' assessment of the injuries involved, decide what type of treatment will be performed and the location of the treatment (emergency room, occupational medicine provider, or on-site first aid).

Examples of serious injuries requiring transport to a medical provider are those resulting in severe blood loss, possible permanent disfigurement, head trauma, spinal injuries, internal injuries and loss of consciousness. Keep in mind that the needs and well-being of the injured are the first priority.

Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service should be available at all times.

Choices to consider for proper transport include: private automobile, RAWHIDE LEASING COMPANY, LLC vehicle, helicopter, crew boat, EMS vehicles including medi-vac helicopters, or any other transportation that can provide safe transportation to the hospital or doctors office in order to provide medical attention to the injured in the quickest manner without the injured employee incurring any additional complications or injuries.

Transportation needs must be preplanned and coordinated with the transportation provider prior to an incident requiring such service.

Training

Volunteers or selected employees are trained by the American Red Cross or equivalent in CPR and first aid. Each of these trained and certified employees are equipped with protective gloves and other required paraphernalia. CPR training must be re-certified annually and first aid training must be re-certified every three years.

GENERAL SAFETY

Purpose

This program is written to ensure compliance regarding local regulatory and general safety requirements related to the operation and management of all RAWHIDE LEASING COMPANY, LLC facilities. Furthermore, this program provides directives and guidelines to managers, supervisors and employees regarding their specific responsibilities.

This program applies to all regular employees, temporary employees, and any contractors working on RAWHIDE LEASING COMPANY, LLC premises. In addition, for any off-site work, these guidelines are to be followed in the event an operator's program is either not in place, or is less stringent.

Key Responsibilities

Safety Manager

- The Safety Manager is responsible for developing and maintaining the General Safety Requirements program, and will keep these procedures in the designated safety manager's office.

Site Manager

- The site manager is responsible for enforcing and maintaining the safety plan and ensuring everything required for compliance is available at all times.

Employees

- Every employee shall be familiar with the workplace General Safety Requirements program of RAWHIDE LEASING COMPANY, LLC,
- Must abide by the requirements laid forth and report all unsafe conditions to their immediate supervisor and/or the Safety Manager,
- Will use all safeguards, safety appliances, and personal protective equipment made available to them in order to follow the safe work practices and procedures of their workplace.

Competency and Training

All workers will be proficient in the operation of equipment in the performance of their assigned job tasks. A competent worker is someone who is sufficiently qualified, trained, and experienced enough to safely perform their job either without supervision, or with only a minimal degree of supervision. Any work that might endanger an employee must be performed by a qualified worker or by a worker who is under the direct supervision of a worker who is competent in the assigned job task. All workers must be trained in the procedures for each job they are required to perform until they become proficient in each task or skill. Only qualified workers who have been properly trained and experienced will be permitted to operate equipment.

Training must include:

- Procedures to be followed in the event of a fire or other emergency,
- The location of first aid facilities,
- The identification of all prohibited or restricted areas,
- Precautions to be taken in order to protect the worker against any physical, chemical or biological hazards they may come into contact with,
- Any procedures, plans, policies and programs that RAWHIDE LEASING COMPANY, LLC is mandated to develop, and
- Anything else deemed necessary to ensure the health and safety of the worker while they are on the job.

All employees shall be instructed in both the recognition and avoidance of unsafe conditions that pertain to their specific work environments and work activities.

Inspections

RAWHIDE LEASING COMPANY, LLC must:

- Ensure that frequent, regular inspections of the workplace, jobsites, materials, and equipment are performed by a competent person,
- Ensure that all work processes and procedures are examined in order to identify any risk to the safety or health of any person at the workplace,
- Investigate every dangerous occurrence or incident as soon as is reasonably possible.
- Ensure that all identified risks and unsafe conditions will be corrected as soon as is reasonably practicable and, in the interim, take immediate steps to protect the safety and health of any person who may be at risk.

General Facility Requirements

Housekeeping

Each work site shall be kept clean and free from materials or equipment that could cause workers to slip or trip. All surfaces used by any worker shall be clear of obstructions, hazards, and accumulations of refuse, snow or ice.

RAWHIDE LEASING COMPANY, LLC requires that a worksite is as clean and sanitary as reasonably practicable.

An adequate supply of potable drinking water shall be kept easily accessible at a project for the use of all workers.

Safe Equipment Maintenance

RAWHIDE LEASING COMPANY, LLC is responsible for ensuring that work site maintenance, systems of work, and working environments are maintained properly for the health, safety, and welfare of workers while at the job site.

RAWHIDE LEASING COMPANY, LLC will ensure all equipment is maintained at regular intervals to ensure the equipment will function safely in the way it was purposed and to be free from obvious defects. Damaged and faulty equipment reporting procedures must be in place to facilitate timely repair of all malfunctioning equipment.

Where a defect is found, RAWHIDE LEASING COMPANY, LLC will ensure that immediate action is taken to protect the health and safety of any worker who may be at risk until the defect is corrected by a competent person.

Any machinery, tool, material, or equipment which is not in compliance with any applicable OSHA requirement is prohibited. The machine, tool, material or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or by physically removing the non-compliant object from its place of operation.

Any worker who knows or has reason to believe that equipment under their control is not in a safe operating condition shall immediately report the condition to RAWHIDE LEASING COMPANY, LLC so repairs to the malfunctioning equipment can be made by the proper personnel.

RAWHIDE LEASING COMPANY, LLC expressly prohibits and does not permit compressed air to be directed towards a worker for the purpose of cleaning clothing or personal protective equipment used by that worker or for any other purpose if the use of compressed air may cause contaminant dispersion into the air which may be harmful to workers.

Whenever workers are present at a worksite, RAWHIDE LEASING COMPANY, LLC will provide adequate lighting for the health and safety of our workers to ensure all work is done properly and safely.

No worker is allowed to smoke in an enclosed place of employment, worksite or work-related area except in designated smoking areas.

Impairment

No person shall enter or remain at any workplace of employment while the person's behavior or ability to work is impaired by alcohol, intoxicating beverages, drugs or other substances so as to create a nuisance or to endanger any person, or to create an undue risk to workers, themselves or anyone else.

Improper Conduct

All workers shall engage in proper activity or behavior. Improper behavior that might create or constitute a hazard to any person is unacceptable. Improper activity or behavior includes horseplay, scuffling, fighting, practical jokes, and unnecessary running or jumping.

Industrial Hygiene

An eyewash fountain shall be provided anywhere a worker may be exposed to any biological or chemical substance hazardous in nature.

All workers who may potentially be exposed to a chemical, biological, or physical agent that may endanger their safety or health shall be trained in the necessary precautions and procedures to be followed when handling, using, and storing the agent. They will also be trained in the proper use and care of all required personal protective equipment, and in the proper use of emergency measures and procedures.

No food, drink or tobacco shall be taken into, left, or consumed in any area where any poisonous substance may be present.

Protective clothing or other safety devices that have been worn next to the skin shall be cleaned and disinfected prior to being worn by another worker.

Workers who handle or use corrosive, poisonous or other substances likely to endanger their health shall be provided with washing facilities with clean water, soap and individual towels.

Thermal Stress

A worker must not be exposed to levels that exceed those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. Clothing corrections must be applied in accordance with the heat stress and strain section of the ACGIH Standard.

The RAWHIDE LEASING COMPANY, LLC must conduct a heat stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable to the local government or territorial agency in whose jurisdiction RAWHIDE LEASING COMPANY, LLC resides. RAWHIDE LEASING COMPANY, LLC will also develop and implement a heat stress exposure control plan.

RAWHIDE LEASING COMPANY, LLC must implement engineering controls to reduce the heat exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. If the above action is not practical, the employer must reduce the exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard by providing:

- Administrative controls, including a work-rest cycle, or
- Personal protective equipment, if the equipment provides protection equally effective as administrative controls.

The employer must provide and maintain an adequate supply of cool potable water close to the work area for the use of a heat exposed worker.

If a worker shows signs or reports symptoms of heat stress or strain, the worker must be removed from the hot environment and treated by an appropriate first aid attendant, if available, or by a physician.

The employer must conduct a cold stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable and to develop and implement a cold exposure control plan, if a worker is-or may be exposed to-the conditions specified below:

- Thermal conditions that could cause cold stress or injury,
- Thermal conditions that could cause a worker's core body temperature to fall below 36°C (96.8°F), or
- Thermal conditions that are below the levels classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard.

RAWHIDE LEASING COMPANY, LLC must implement effective engineering controls to reduce the exposure hazard to levels above those classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard. If the above action is not practical, RAWHIDE LEASING COMPANY, LLC must reduce the exposure to the hazard by providing effective administrative controls or personal protective equipment if the equipment provides protection equally effective as administrative controls.

All workers must wear adequate insulating clothing and personal protective equipment to protect them from the cold if their work takes place outdoors in snow or ice covered terrain. If excessive ultraviolet light, glare or blowing ice crystals may present a risk of injury to the eyes, workers must wear eye protection appropriate to the hazardous conditions.

If a worker exposed to cold shows signs or reports symptoms of cold stress or injury, the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician.

GENERAL WASTE MANAGEMENT

Purpose

This waste management strategy has been developed to provide the guidance and requirements necessary for efficient, effective and compliant waste management during construction and day-to-day operations.

Scope

This document covers all RAWHIDE LEASING COMPANY, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Procedure

The RAWHIDE LEASING COMPANY, LLC Safety Manager or other designated person is accountable for managing waste and the disposal of wastes generated at the work site.

Waste Estimation

Each work site will estimate the waste, trash and/or scrap that will be generated and taken into consideration prior to work being performed so the need for containers and waste removal, if necessary, can be determined.

Each site should utilize the following for planning of dumpster scheduling and total non-hazardous dry waste material. These figures do not include any recycling or waste minimization efforts and reflect no use of an incinerator. Dumpster figures are based on a 40 yard container and should be changed to reflect the use of another size dumpster by changing the table below.

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RAWHIDE LEASING COMPANY, LLC must work in conjunction with the project site or owner to ensure proper disposal of wastes or scrap materials.

RAWHIDE LEASING COMPANY, LLC must ensure the owner or client is aware of how wastes and scrap materials will be disposed of and whether they will be taken off site by RAWHIDE LEASING COMPANY, LLC or will be disposed of on the owner or client's site.

Waste Segregation

- Do not mix waste streams or types,
- Only place waste in the designated container, satellite accumulation area (SAA), recyclable accumulation area (RAA), universal waste accumulation area (UWAA) or designated dumpster.

Recycling

Wastes should be recycled whenever practicable. RAWHIDE LEASING COMPANY, LLC will encourage the proper separation of all waste materials to ensure opportunities for reuse or recycling occurs at each work site. The collection of recycled material will reduce the total load on the environment. Sufficiently sized bins must be lined with a plastic bag and clearly labeled for use. Posters from RAWHIDE LEASING COMPANY, LLC will be posted throughout the work site to encourage recycling by everyone. Collection bins will also be placed in administrative areas and will use the following color guiding:

- Blue – Paper
- Green - Aluminum cans
- Yellow – Plastic

All cardboard will be flattened. Staples and excess shipping tape removed from the cardboard. No cardboard shall be placed in dumpsters heading for a landfill.

Waste Handling Matrix

Each work site will develop a Waste Handling Matrix (sample shown) that will:

- Address safe practices related to the immediate storage and handling of waste, scrap or leftover material;
- The handling, organization and storage of waste and scrap materials to minimize potential impact to the environment. In order to minimize the potential for a spill or impact to the environment, waste materials will be properly stored and handled. During outdoor activities receptacles must be covered to prevent dispersion of waste materials and to control the potential for runoff.

Waste Stream	Location	Activity Generating Waste	Hazardous /Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Aerosol Can Contents	Equipment Repair Shop	Puncturing of aerosol cans	Hazardous	SAA is self-contained in the equipment repair shop	Ship to assigned site for recycling or disposal	Read warnings before use of unit.
Aerosol Can Puncturing Unit Filter	Equipment Repair Shop	Filter Changes	Hazardous	Place in designated labeled container	Ship to assigned site for recycling or disposal	Change filter every 3 months
Aerosol Cans	Various Locations	Painting, lubricants, cleaning	Non-Hazardous if aerosol can is punctured and drained	Place punctured aerosol can in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster from client.	See "Scrap Metal" for waste stream management
Ash	Smart Ash Unit	Incineration of acceptable waste	Non-Hazardous	Dispose of Immediately	Place in the Burnable Waste	Gloves Goggles

Waste Stream	Location	Activity Generating Waste	Hazardous /Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
					Dumpster	
Automotive and Heavy Equipment Parts-Used	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in RAA	Returned to vendors for recycling	Starters, Alternators, Pumps, Transmissions
Batteries (Alkaline)	Various Locations	Battery Failures	Universal Waste	Place in the UWAA	"D" cell and below are acceptable in the Non-Burnable Waste Dumpster	Ship to designated site for recycling or disposal
Batteries (Lead Acid)	Equipment Repair Shop and Fab Shop	Battery Failures	Universal Waste	No storage allowed. Containment boxes are labeled and available in the shops.	Lead acid batteries are returned to the Vendor upon removal	Ship to designated site for recycling
Batteries (NiCad)	Various Locations	Battery Failures	Universal Waste	UWAA in the equipment repair shop.	Ship to assigned site for recycling or disposal	Cell phones, radios
Butane Torch Bottle	Various Locations	Mechanic activities	Excluded Hazardous if recycled	Place drained Butane Torch Bottles in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster	Prosolv Butane Bottle processor I
Cardboard/ Office Paper	Parts Department & Offices	Shipping Boxes & Office Activities	Non-Hazardous	Place in RAA	Place on pallet in RAA and band for shipment to assigned site for recycling.	

Waste Stream	Location	Activity Generating Waste	Hazardous /Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Computers Discarded	Parts Department & Offices	Replacement	Non-Hazardous	Place in RAA	Ship to assigned site for recycling or disposal	
Diesel Filters-Used	Equipment Repair Shop and Fab Shop	Filter Changes	Non-Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Diesel Rags	Various Locations	Mechanic activities	Non-Hazardous	Oily waste rag in clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Drained Diesel	Equipment Repair and Fab Shop	Draining diesel fuel and filters	Non-Hazardous when burned as off-Spec fuel	Place in "used oil" tank in the equipment repair shop and fab shop.	Burned for energy recovery in clean burn multi-oil heating system.	
Empty Paint Cans	Various Locations	Painting activities	Non-Hazardous	No storage allowed	Ship to assigned site for recycling or disposal	Paint cans must be RCRA empty.
Fluorescent Light Ballast	Various Locations	Failure	Non-Hazardous unless they contain PCB's or DEHP	None	Place in Non-Burnable Dumpster	Ballast will say on the label if it contains PCB's
Fluorescent Light Bulbs	Shops, Office Areas	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA in the shop area	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Glass	Various Locations	Replacement	Non-Hazardous	None	Place in Non-Burnable Dumpster	Ensure glass containers are empty.

Waste Stream	Location	Activity Generating Waste	Hazardous /Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Glycol Rags	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Minimize use of absorbent rags
Glycol-Used	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	RAA - self-contained tank on recycling unit	Recycled in glycol recycling unit	Recycling unit stored in shop
Grinding Wheels	Equipment Repair Shop and Fab Shop	Grinding activities	Non-Hazardous	None	Place in Non-Burnable Dumpster	
Hoses & Belts	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in Non-Burnable Dumpster	Place in Non-Burnable Dumpster	Drain all fluids from hoses
Metal Shavings/Cuttings	Equipment Repair Shop and Fab Shop	Fabricating activities	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Place in recycle metal dumpster	Ensure there are no free flowing cutting fluids present before disposal.
Oil Filters-Used	Equipment Repair Shop and Fab Shop	Oil filter changes	Excluded Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Oil-Used	Equipment Repair Shop, Fab Shop, Service Trucks	Draining oil and filters	Excluded Hazardous if burned for energy recovery	Receiving sumps are located in the Equipment Repair Shop and Fab Shop	Burned for energy recovery in clean burn multi-oil heating system.	Keep lids on receiving sumps at all times. DO NOT PUT SOLVENTS INTO USED OIL
Oily Waste (rags, absorbents)	Various Locations	Mechanic activities, equipment drips and leaks	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Collected daily. See "Ash" for management and disposal

Waste Stream	Location	Activity Generating Waste	Hazardous /Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Paint Waste (rags, rollers, brushes, etc.)	Various Locations	Painting activities	Determine on per occurrence basis. Use MSDS or testing	If hazardous, store in the assigned area. If non-hazardous, no storage is required.	If hazardous, ship to assigned site for disposal. If non-hazardous, place in burnable waste dumpster.	Need to review MSDS, do analytical test, or use generator knowledge to make waste determinations.
Parts Cleaner Rags	Equipment Repair Shop	Cleaning parts	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Scrap Metal	Various Locations	Fabrication activities & house cleaning	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Place in recycle metal dumpster	Eye Protection Gloves
Sodium Vapor/ Metal Halide Light Bulbs	Various Locations	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA.	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Tires	Various Locations	Replacement	Non-Hazardous	None	Place tires up to 20" rim diameter into dumpster	
Toner Cartridges	Offices	Copiers, printers, fax machines	Non-Hazardous	Placed in original container in RAA	Ship to assigned site for recycling or disposal	Verify toner is expended before disposal.
Water Scrubber Filter & Absorbents	Equipment Repair Shop and Fab Shop	Filtering sump water in shops	Non-Hazardous	None	Incinerated in Smart Ash unit	See "Ash" for management and disposal

Waste Stream	Location	Activity Generating Waste	Hazardous /Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Welding Rods	Various Locations	Welding activities	Excluded Hazardous	Placed in recycle metal dumpster or metal only RAA's	Ship to assigned site for recycling or disposal	See "Scrap Metal" for waste stream management
Wood Waste	Various Locations	Various activities and shipping pallets	Non-Hazardous	Store on the far back corner of the pad or in the dump truck box if available.	Place in recycle wood dumpster	Pallets are refurbished and recycled when possible

Storage Requirements

Project related wastes are to be stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees. Proper waste receptacles must be provided for all trash and materials that may be reused or recycled during a project.

PPE

As part of each site waste management plan RAWHIDE LEASING COMPANY, LLC shall determine a PPE matrix that includes gloves, hand protection, eye and face protection and/or other necessary PPE.

Education and Training

Employees shall be instructed on managing waste generated at the work site along with the proper disposal method of wastes. Examples include:

- Instruction on the proper handling, storage and disposal of wastes. General instruction on disposal of non-hazardous wastes, trash or scrap materials generated at the site will also be given to all employees. If wastes generated are classified as hazardous, employees must also be trained to ensure proper disposal and compliance with regulations;
- Methods for minimizing waste;
- Recycling methods and proper PPE to be utilized.

HAND and POWER TOOLS PROGRAM

Purpose

The purpose of the Hand and Power Tools Program is to establish policies and procedures for the safe operation of hand tools, power tools and other portable tools, including guarding. All hand and power tools shall be maintained in a safe working condition.

Scope

This program applies to all employees who use hand and power tools while engaged in work at RAWHIDE LEASING COMPANY, LLC facilities and/or offsite facilities.

Responsibilities

Managers and Supervisors

Make sure that operation, maintenance and proper use of tools are fully understood by all employees,

- Train employees and provide them with all personal protective equipment (PPE) needed to safely operate portable tools.

Employees

- Will use the proper tool for each task,
- Will follow the manufacturer's recommendations on the safety and operation for the tool.

Requirements

General

All tools must be an approved type and in good condition in order to be used.

Any tool which is not in compliance with any applicable requirement of this part is prohibited and shall be identified as unsafe by tagging or locking the controls to render them inoperable.

Tools may be inspected at any time,

Any employee has the authority, and is responsibility, to remove unsafe tools from use, no matter who they belong to

Tools deemed unsafe by any employee must be labeled with a "DO NOT USE OR OPERATE" tag to prevent use of the tool.

Employees are required to always use the appropriate tool for the task at hand. Substitute tools are not allowed. Makeshift tools are strictly prohibited.

Avoid using tools containing metal around energized electrical circuits or equipment (e.g., hammers with metal handles, screwdrivers with metal in the handle, metal measuring tapes).

Throwing tools from one place to another or one person to another is prohibited. Tools must be safely carried and, if lowered from one elevation to another, must be secured in tool bags or buckets and firmly attached to hand

lines.

Tools must never be placed on unsecure, elevated surfaces.

Impact tools (e.g., chisels and punches) that become cracked or mushroomed must be dressed, repaired or replaced prior to further use.

Pipes, ground rods, drills, chisels and punches must be held with applicable holders or tongs while being struck by another employee. These must never be held with the hands.

Employees are not permitted to use shims to make a wrench fit. Wrenches with damaged or sprung jaws will not be used.

Employees may only use tools for the purposes for which they are intended.

Sharp-edged tools must be safely handled and stored to prevent injury or damage to the tool or other property. These tools will not be carried in pockets without the use of appropriate protectors to preserve the edge.

Splintered, loose or cracked wooden handles must be replaced. Taping or lashing the handle with wire is unacceptable.

Employees must not leave tools lying around where they may cause other persons to trip or fall.

Employees working on or above open grating must cover the grating with a canvas or other covering to prevent tools and parts from dropping through the grate where others are present. Alternately, the danger area below the grating may be guarded or barricaded.

The insulation on hand tools is primarily for comfort and must not be depended on to protect employees from high voltage shock. Exceptions to this are approved live line tools.

Portable Electric Tools

Metal portable electric tool parts that do not carry current (e.g. drills and saws) must be effectively grounded when connected to a source of power unless:

- The tool has approved double insulation, or
- The tool is connected to an isolated transformer or power supply.

Power tools must be inspected before each use to ensure the device is in proper working order and has all of its applicable safety devices.

Power tools may only be used as they were designed and intended to be used, according to the manufacturer's instructions. Using the tool's electrical cords for raising or lowering tools is prohibited.

Tools should be well-maintained. Power tools should be safely disconnected from the power source before adjustments or repairs are made.

Employees without a valid Hot Work Permit are prohibited from using electrical tools in hazard areas exposed to flammable vapors, gases or dusts

When using portable electric tools, ground fault circuit interrupters or an Assured Grounding Program must be in place. This requirement does not apply to equipment that runs off of portable or vehicle mounted generators at 5 kilowatts or less, those that are isolated from ground or to equipment running directly off of secondaries.

Pneumatic Tools

- Pneumatic tools must never be pointed toward another person,
- Pneumatic power tools must be secured to the hose or whip in such a way to prevent accidental disconnection of the tool from the hose,
- Pneumatic impact tools (percussion tools) must have safety clips or retainers installed and maintained to prevent accidental discharge of their attachments.

Compressed Air Tools

- Must be reduced to less than 30 psi when used for cleaning purposes and then only used with personal protective equipment (PPE) and effective chip guarding,
- Cannot be used to blow dust or dirt off clothing,
- May not be left unattended while under pressure,
- Are only to be operated by competent persons trained in the appropriate use of the tool.

Safe operating pressure, as recommended by the manufacturer, must be maintained for hoses, valves, pipes, filters and other fittings. The manufacturer recommended limits must not be exceeded.

Use of hoses for lifting or lowering tools is strictly prohibited.

Adjusting or changing air tools requires that the air is shut off at the air supply valve, ahead of the hose. Before breaking the connection, bleed the hose at the tool. This is not necessary for tools equipped with quick-change connectors.

Secure air tool connections before turning on the air pressure. The tool should be properly under control by the operator before the air is turned on.

Clamps and couplings on pressurized air hoses must be pinned with appropriate fasteners. Only approved end-fitting clamps may be used. Screw type heater hose clamps are unacceptable.

Hoses and their connections used in the conduction of compressed air to equipment must be designed for the pressure and service they are being used for. Never point a hose toward someone while blowing it down. Conductive hoses should not be used near energized equipment.

Employees are required to wear foot protection when operating impact tools (e.g., paving breakers, rotary drills, tampers, clay spades, etc.) and any other time as required by the supervisor.

Pneumatic nailers, staplers and other equipment with automatic fastener feeds that operate at 100 psi or higher pressure at the tool are required to have a safety device on the muzzle to prevent against the ejection of fasteners, unless this muzzle would be in contact with the work surface.

Airless spray guns that atomize paint and fluids at high pressures of 1,000 lbs. or more per square inch must be equipped with safety devices (automatic or manual) to prevent accidental pulling of the trigger and to prevent the release of paint or fluid before the safety device is manually released. Alternately, a diffuser nut, high velocity release and a nozzle tip guard or other equivalent protection is acceptable.

Powder Actuated Tools

Powder actuated tools are those that are activated by an explosive charge, and:

- Only qualified employees certified in the use of these tools may operate them,
- Explosive charges for these tools must be transported and carried in approved containers,
- Employees using these tools will be provided with face, eye and hearing protection.

Tools are to be maintained and serviced regularly by qualified persons. Prior to using these tools, the materials on

which the tools are to be used must be inspected to eliminate hazards and to determine the tool's suitability for the task at hand.

Prior to Use

- The operator will make sure the protective shield is securely attached to the tool,
- The operator will inspect the tool to determine that:
 - It is clean,
 - Its moving parts operate smoothly,
 - Guards and safety devices are in place,
 - The barrel is free of obstructions.
- Only qualified employees certified in the use of these tools may operate them,
- The operator must read and familiarize himself/herself with the operating guidelines and procedures as recommended by the manufacturer.

When a tool sustains damage or develops a defect during use, the employee will stop using the tool and remove it from service, as noted in this program.

Tools are not to be loaded until just before the intended firing time. Unattended tools should not be left loaded. Tools, whether loaded or unloaded, should never be pointed at another person. Tools must never be left unattended in a place where unauthorized persons may have access to the tool.

If the tool misfires, the operator will hold the tool in the operating position for at least 30 seconds. The operator will then try the tool a second time. If the tool misfires again, the operator will hold the tool in position for another 30 seconds. The operator must then remove the explosive charge with strict adherence to the manufacturer's instructions.

Fasteners must not be driven into unusually hard or brittle materials including, but not limited to, surface hardened steel, live rock, hollow tile, glazed tile, cast iron, glass block, live rock or face brick.

On the other hand, driving into easily penetrable materials should be avoided unless the materials are backed in such a way that will prevent the pin or fastener from passing completely through the material and creating a flying missile hazard on the other side.

Tools must not be used in flammable or explosive atmospheres.

Hydraulic Power Tools

Hydraulic powered tools must use fire-resistant fluids approved according to Schedule 30 of the U.S. Bureau of Mines, Department of the Interior, which will retain its operating properties at the most extreme temperatures to which it is exposed.

The manufacturer's safe operating pressures must be adhered to for hoses, pipes, valves, filters and other fittings.

When using hydraulic tools on or around energized lines or equipment, non-conducting hoses of adequate strength for the normal operating pressure must be used.

Hydraulic Jacks

Loading and Marking

- The operator must ensure that the jack being used is rated sufficiently to lift and sustain the load to which it is subjected,
- The rated load must be marked in a legible and permanent manner in a prominent location on the jack via stamping, casting or other means.

Operation and Maintenance

- If a firm foundation is not available, the base of the jack must be blocked. If there is a possibility that the cap will slip, a block must be placed between the load and the cap,
- The operator must keep an eye on the stop indicator, which must be kept clean, in order to determine the travel limit. The indicated limit must not be exceeded.
- After the load is raised, it must be secured at once,
- Antifreeze will be supplied in adequate quantities for hydraulic jacks that are exposed to freezing temperatures,
- Jacks must be well-lubricated according to the manufacturer's recommendations at regular intervals.

The operator must inspect the jack before each use. Jacks that are deemed unsafe must be tagged accordingly and taken out of use until repairs are made.

Abrasive Blast Cleaning Nozzles

Blast cleaning nozzles will have an operating valve that must be held open manually. A support will be provided to mount the nozzle on when it is not in use.

Fuel Powered Tools

Fuel-powered tools must be stopped during refueling, servicing or maintenance. Fuel must be handled, stored and transported according to the Flammable and Combustible Liquids Program.

When using fuel powered tools in enclosed spaces, the requirements for concentrations of toxic gases apply. The use of protective equipment must be adhered to.

Guarding Portable Tools

Guarding must be in place and in operating condition at all times when the tool is in use. The operator is prohibited from manipulating the guard in a manner that will compromise the integrity of the guard or the protection for which it is intended. Guarding on portable tools will meet ANSI B15.1 requirements.

Portable Circular Saws

- Portable, powered circular saws that have a blade diameter greater than 2 in. must have guards in place above and below the base plat or shoe,
- The upper guard must cover the depth of the saw's upper teeth, except for the minimum arc required to allow retraction of the guard and contact with the work surface,
- The lower guard must cover the depth of the saw's lower teeth, except for the minimum arc required to allow the retraction of the guard and contact with the work surface,
- When the tool is pulled back from the work surface, the lower guard automatically returns to the covering position
- Cracked or damaged saw blades must be removed from service.

Switches and Controls

- All hand held power tools are required to have a constant pressure switch or control and may be provided with a lock-on control that allows turnoff by a single motion of the same finger or fingers that turn it on,
- A constant pressure switch or a control that will shut off the power when the pressure is released must be in place on all hand-held powered circular saws with blade diameters of 2 inches or more, hydraulic, electric, or pneumatic chain saw, and percussion tools without positive accessory holding,
- Hand-held gasoline powered chain saw must have a constant pressure throttle control to shut off the power to the chain when the pressure is released,
- Operating controls on hand-held power tools will be placed to minimize the possibility of accident operation, if accidental operation would be a potential hazard to employees,
- Portable electric powered tools will be grounded according to the requirements set forth in the Electrical Safety Program. All electric power tools must have a three-prong plug.

Portable Abrasive Wheels

Safety Guards Exceptions

- Mounted wheels used in portable operations 2 inches or less in diameter,
- Wheels used for internal work while within the work being ground,
- Types 16, 17, 18, 18R, and 19 cones, plugs and threaded-hole pot balls where the work offers protection,
- Guards must be made of steel or other material of suitable strength,
- A safety guard must cover the spindle end, nut and flanges. The guard must be mounted in a way that maintains its proper alignment with the wheel. The strength of the fasteners must exceed the strength of the guard,
 - Exception: Safety guards may be constructed so that the spindle end, nut, and outer flange are exposed if the work provides adequate protection to the operator. These may also be exposed when the portable machine is designed for and used with type 6, 11, 27 and 28 abrasive wheels, cutting off wheels, and tuck pointing wheels,
- When the work provides cover for the entire side of the wheel, the guard's side covers can be omitted.

Mounting and Inspection of Abrasive Wheels

- All wheels must be examined before mounting. A ring test must be conducted to ensure they have not been damaged during transit, storage, etc.,
- To conduct the ring test, "tap" the wheels about 45 degrees each side of the vertical midline and about 1-2 inches from the periphery. Then, rotate the wheel 45 degrees and repeat the test. Undamaged wheels will have a clear metallic sound. If the wheel is cracked, there will not be a clear "ring",
- The machine's spindle speed must be checked before mounting wheels to ensure that it doesn't exceed the maximum operating speed as marked on the wheel,
- Grinding wheels must fit freely and remain free on the spindle under all grinding conditions,
- To avoid excessive pressure from spindle expansion and mounting, a controlled clearance must be maintained between the wheel hole and spindle,
- The machine's spindle must be manufactured to nominal (standard) size plus zero minus .002 inch. The wheel hole must be suitably oversized to ensure safety clearance under the conditions of operating heat and pressure,
- All surfaces in contact with wheels, flanges and blotters must be flat and free of aberrant objects,
- When the use of a bushing is required in a wheel hole, it must not exceed the width of the wheel and must not come into contact with the flanges.

Portable Grinders

"Revolving cup guards" that mount behind and turn with the wheel will be used. These will be made of steel or other adequate materials and will enclose the wheel sides up from the back for one third (1/3) of the thickness of the wheel. A clearance of no more than one-sixteenth inch must be maintained between the guard and wheel side.

Right angle grinders, or vertical portable grinders, will have a maximum angle of exposure of 180 degrees. The guard will be placed between the wheel and the operator during use. The guard may be adjusted to ensure that, in case of an accident, pieces of the broken wheel will be deflected away from the worker.

Other Portable Grinders

The maximum allowable angular exposure for the periphery of the grinding wheel and the sides for safety guards must not exceed 180 degrees. The top half of the wheel must be enclosed at all times.

Personal Protective Equipment

Employees will be provided with personal protective equipment (PPE) if they may be exposed to any of these possible hazards:

- Falling, flying, abrasive or splashing objects,
- Harmful dust, vapors, gases, fumes or mists.

HAZARD COMMUNICATION

Purpose

The purpose of this program is to ensure that the hazards of all chemicals and substances identified and evaluated, and that the information concerning their hazards is communicated to employees, emergency response organizations, state and federal agencies, and other employers and contractors, as necessary. This hazard information will be clearly communicated, and displayed in accordance with this Hazard Communication Program.

RAWHIDE LEASING COMPANY, LLC is firmly committed to providing each of its employees a safe and healthy work environment. It is recognized that workers may use chemicals or substances that have potentially hazardous properties. When using these substances, workers must be aware of the identity, toxicity or hazardous properties of a chemical or substance. We believe an informed employee is more likely to be a safe employee. To this end, we have established and implemented a written Hazard Communication Program.

Scope

This program is applicable to all employees who may come in contact with hazardous chemicals while working for RAWHIDE LEASING COMPANY, LLC. This document is to be followed by all RAWHIDE LEASING COMPANY, LLC employees and contractors on RAWHIDE LEASING COMPANY, LLC owned premises. In addition, this program is to be used in the event an operator program does not exist or is less stringent than our own.

Definitions

Chemical - any element, chemical compound, or mixture of elements and/or compounds.

Chemical Inventory List - a list of chemicals used at this facility, or by personnel that report to this facility.

Electronic Access – using electronic media (telephone, fax, internet, etc.) to obtain Material Safety Data Sheets or health information.

Facility - an establishment at one geographical location containing one or more work areas.

(GHS) Globally Harmonized System - The Globally Harmonized System (GHS) is an international approach to hazard communication, providing agreed criteria for classification of chemical hazards, and a standardized approach to label elements and safety data sheets. NOTE: Most new GHS requirements apply to substance manufacturers or distributors since they are responsible for including safety data sheets with purchased substances. However, all employers are still required to train each employee on the new label elements and safety data sheets format. Specific training information can be found at: <https://www.osha.gov/dsg/hazcom/>

Hazardous Chemical - any chemical that is a physical hazard, a health hazard, or has a Permissible Exposure Limit established for it.

Hazardous Substance - see hazardous chemical.

Hazard Communication Program Coordinator - the person who has overall responsibility at a facility for that facility's Hazard Communication Program.

Health Hazard - a substance for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic adverse health effects may occur in exposed employees.

IDLH - immediately dangerous to life and health.

Immediate Use - the chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Job Site - an area remote from a facility where hazardous chemicals are stored or used and employees are present for the purpose of business.

(MSDS) Material Safety Data Sheet - a written or printed document containing chemical hazard and safe handling information, prepared in accordance with the OSHA Occupational Safety & Health Standards, Section 1910.1200, paragraph (g). Recently referred to as (SDS) "Safety Data Sheets" under 2013 GHS HAZCOM update.

(NFPA) National Fire Protection Association Labeling - a common industry labeling method developed by the National Fire Protection Association to identify the hazards associated with a particular chemical.

(PEL) Permissible Exposure Limit - the maximum eight-hour time weighted average of any airborne contaminant to which an employee may be exposed.

Readily Available - when an employee has access during the course of his/her normal work shift.

(SDS) Safety Data Sheet – a written or printed document containing chemical hazard and safety handling info, prepared in accordance with the new HAZCOM GHS requirements.

Substance - see Chemical.

(TLV) Threshold Limit Value - the airborne concentration of a substance that represents conditions under which it is believed that nearly all normal workers may be repeatedly exposed day after day without adverse effect.

Work Area - a room or defined space in a facility where hazardous chemicals are stored or used and where one or more employees are present.

Workplace - see Facility.

Workplace Chemical List - see Facility Chemical List.

Responsibilities

A written hazard communication program shall be developed, implemented and maintained at each RAWHIDE LEASING COMPANY, LLC workplace. The program will describe how labels and other forms of warning, material safety data sheets and employee information will be kept, maintained, and disseminated.

The Safety Manager is responsible for developing and implementing the Hazard Communications Program. Managers are responsible for maintaining Material Safety Data Sheets and the Chemical Inventory List for their respective locations. The Safety Manager reviews the MSDS files and Chemical Inventory List at each location at least annually to ensure they are current and complete.

The Safety Manager is also responsible for ensuring that all containers from manufacturers or distributors have the correct and updated labels per the new GHS requirements and for ensuring that all applicable employees are

trained on the new label elements and safety data sheets format. Training info can be found here:
<https://www.osha.gov/dsg/hazcom/>

Employees are responsible for following the requirements set forth in the Hazard Communication Program, to use proper personal protective equipment, to report containers without labels immediately to their supervisor and to never deface any label.

Any employee who transfers any material from one container to another is responsible for labeling the new container with all required information.

All employees are responsible for learning the requirements of this section and for applying them to their daily work routine.

Requirements

Introduction

This Hazard Communication Program was prepared for use by RAWHIDE LEASING COMPANY, LLC to explain how we meet the requirements of the federal Occupational Safety and Health Administration's (OSHA's) Hazard Communication Standard (29 CFR 1910.1200). It spells out how we inventory chemicals stored and used, how we obtain and use material safety data sheets, how we maintain labels on chemical substances, and how we train employees about the hazards of chemicals they are likely to come in contact with on the job.

Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- As part of our ongoing hazard communication effort, we will make available other information in addition to the program to any worker requesting it.
- Asking to see this information is an employee's right,
- Using this information is part of our shared commitment to a safe, healthy workplace.

List of Hazardous Chemicals

RAWHIDE LEASING COMPANY, LLC maintains a listing of all known hazardous chemicals known to be present at each job site by using the identity it is referenced by on the appropriate material safety data sheet (MSDS). This identity is often a common name, such as the product or trade name (i.e., Lime-A-Way).

The Chemical Inventory List is updated annually by the Hazard Communication Program Coordinator or their designee with additional updates being made when necessary.

The facility Chemical Inventory List must be available for review upon request. Additionally, a written hazard communication program must be developed, implemented & maintained at each workplace.

Material Safety Data Sheets | Now "Safety Data Sheets" due to the new GHS requirements.

Chemical manufacturers are responsible for developing MSDS's, now SDS's. RAWHIDE LEASING COMPANY, LLC shall have an SDS for each chemical used with the exception of consumer products. SDS's must be obtained for each required chemical from the chemical manufacturer, supplier, or vendor. The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Material Safety Data Sheet in a timely fashion is strictly prohibited.

MSDS's now known as SDS's shall be maintained and readily accessible in each workplace. SDS's can be maintained at the primary work site, however, they should be immediately available in case of emergency. SDS's must be made available upon request to employees, their designated representatives, the Assistant Secretary of Labor, and to the Director of OSHA.

Safety Data Sheets are filed alphabetically, and by material classification, in the SDS Book. A Chemical Inventory List is provided in the front of the MSDS Book, listing all MSDS' contained therein. This inventory serves as the index of the MSDS Book. The SDS Book shall be displayed in a prominent location in the work area where it is accessible to all employees.

A copy of a SDS request form is located in the first section of the SDS Book. An employee may use a copy of this form to request an SDS or he may ask the Manager for one. In either case, the requested SDS must be given to the employee within 24 hours of being requested.

The Safety Data Sheet must be kept in the SDS library for as long as the chemical is used by the facility.

Electronic access (telephone, fax, Internet, etc.) may be used in the acquisition of any needed SDS and to maintain SDS libraries and archives.

The Manager is responsible for seeing that the Chemical Inventory List inventory is maintained, is current, and is complete. He will review and update the inventory and the SDS Book at least annually. When a hazardous material has been permanently removed from the work place, its SDS is to be removed from the SDS's Book and the Chemical Inventory List. The SDS is then placed in a "dead file" in case it is needed in the future.

SDS's for hazardous materials to which employees have been exposed must be maintained after the employee leaves the employment of RAWHIDE LEASING COMPANY, LLC.

Employees will be advised of all special instructions, PPE, and the hazards associated with chemicals-including chemicals contained in unlabeled pipes-in their work areas. The Manager will inform employees of the hazards of non-routine tasks by presenting a copy of the site specific hazardous materials list, ensuring that the employee is aware of their presence should a non-routine task with unfamiliar materials present itself.

Employees have the right to request MSDS on any chemical, which must then be provided without any issues.

Labels, Labeling and Warnings:

The Manager will ensure that all hazardous chemicals used or stored in the facility are properly labeled.

- Damaged labels or labels with incomplete information shall be reported immediately,
- Damaged labels on incoming containers of chemicals will not be removed,
- New labels shall be provided as needed so that all containers are labeled correctly,
- Only containers into which an employee transfers a chemical for their own immediate use will not require labeling,
- Employees who are unsure of the contents of any container, vessel, or piping must contact their supervisor for information regarding the substance including:
 - The name of the substance,
 - The hazards associated with the substance,
 - The safety precautions required for working with the substance.

Labels, tags, or markings on containers shall use the following 16-section (GHS) formatting convention and headings:

- Identification

- Hazard(s) identification
- Composition/information on ingredients
- First-Aid measures
- Fire-fighting measures
- Accidental release measures
- Handling & Storage
- Exposure controls/personal protection
- Physical and chemical properties
- Stability and reactivity
- Toxicological information
- Ecological information
- Disposal considerations
- Transport information
- Regulatory information
- Other information, including date of preparation or last revision

All containers must be labeled correctly under the new GHS HAZCOM standard (this responsibility usually falls upon the manufacturers shoulders. However, if labels are not present for any reason, employers are responsible for labeling containers. Upon transferring the content of one container to another, the employee must label the new container with all required information. This information can be obtained from the labeling of the original container or from the material's SDS. Any container of a potentially hazardous material that will not be emptied during one shift must be labeled, without exception.

Personnel in the Shipping and Receiving Departments are responsible for the proper labeling of all containers shipped by RAWHIDE LEASING COMPANY, LLC and for the inspection of all incoming materials for correct labeling. Chemicals received from vendors that are improperly labeled must be rejected.

NFPA Standard 704 labels shall be the preferred hazard identification method used in RAWHIDE LEASING COMPANY, LLC facilities and on materials containers used on client sites. All employees, clients, subcontractors, and visitors who may come in contact with a hazardous substance must be briefed to ensure understanding of the NFPA 704 labeling system.

Training

Employees shall be provided with appropriate, effective information and training on the hazardous chemicals in their work area at the time of their initial assignment, and upon the introduction of a new physical or health hazard into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenics) or specific chemicals. However, chemical-specific information must always be available through labels and safety data sheets.

Additional training will be provided whenever a new chemical hazard is introduced into the work area. Supervisors will conduct supplementary training when deemed necessary in order to reinforce the importance of the proper use and handling of chemicals.

Only facility employees and individuals knowledgeable with RAWHIDE LEASING COMPANY, LLC Hazard Communication program will conduct training sessions.

The Manager shall ensure records of employee training are maintained properly.

When an outside contractor, such as a pest control worker or a carpenter, enters a RAWHIDE LEASING COMPANY, LLC site in order to perform a service for RAWHIDE LEASING COMPANY, LLC, they must first present MSDS' for any and all hazardous chemicals which will be used. These MSDS' will be treated with the same training requirements as the MSDS' kept on site for regularly used chemicals and materials. The Manager will be responsible for

contacting each contractor prior to work commencing, in order to gather and disseminate any information concerning chemical hazards the contractor is bringing into the work place.

The Hazard Communication Program documented training shall, as a minimum, include:

- Requirements, details, and rights of the employee as contained in the Hazard Communication regulation,
- Operations and work areas where hazardous chemicals are present,
- Location of the written Hazard Communication Program, SDS's and the Chemical Inventory List,
- How to access SDS's or SDS information,
- How to read labels and Material Safety Data Sheets for pertinent hazard information,
- How employees can obtain and use the appropriate hazard information,
- Methods and observations that may be used to detect the presence or release of hazardous chemicals by use of monitoring devices, visual appearance or odor,
- The physical & health hazards of chemicals in the immediate work area,
- Protection measures utilized for the prevention of hazards related to exposure,
- Appropriate work practices,
- Emergency procedures,
- The use of proper PPE.

Multiple Work Sites

Where employees must travel between work places during a work shift, the written HAZCOM Program shall be kept at a primary job site. If there is no primary job site, then the program shall be sent with employees.

The program shall be made available, upon request, to employees, their designated representatives, the Assistant Secretary, and the Director in accordance with requirements of 29 CFR 1910.1020(e).


Multiple Employer Job Sites

A pre-job briefing shall be conducted with the contractor before work commences on site.

- During this pre-job briefing, contractors shall provide to RAWHIDE LEASING COMPANY, LLC current copies of all Safety Data Sheets along with the label information for every hazardous substance brought on-site.
- RAWHIDE LEASING COMPANY, LLC must notify and provide required MSDS and label information for all hazardous materials the contractor may encounter on the job,
- Labeling systems and precautionary measures to be taken by the contractor during both normal conditions and emergencies shall be addressed,
- By providing such information to other employers, RAWHIDE LEASING COMPANY, LLC does not assume any obligations that other employers have for the safety of their employees,
- In this regard, other employers working on RAWHIDE LEASING COMPANY, LLC property, or for RAWHIDE LEASING COMPANY, LLC on client's property, remain fully responsible for developing and implementing their own compliant hazard communication programs.

Hazard Warnings / NFPA 704

The NFPA 704 Diamond is a means of disseminating hazard warning and information for a specific material. The diamond is divided into four sections. Each of the first three colored sections has a number in it associated with a particular hazard. The higher the number is, the more hazardous a material is for that particular characteristic. The fourth section includes special hazard information. The four sections and an explanation of the numbers in them are provided as a reference below:

					
RATING NUMBER	HEALTH HAZARD	FLAMMABILITY HAZARD	INSTABILITY HAZARD	RATING SYMBOL	SPECIAL HAZARD
4	Can be lethal	Will vaporize and readily burn at normal temperatures	May explode at normal temperatures and pressures	ALK	Alkaline
				ACID	Acidic
3	Can cause serious or permanent injury	Can be ignited under almost all ambient temperatures	May explode at high temperature or shock	COR	Corrosive
				OX	Oxidizing
2	Can cause temporary incapacitation or residual injury	Must be heated or high ambient temperature to burn	Violent chemical change at high temperatures or pressures	☠	Radioactive
				W	Reacts violently or explosively with water
1	Can cause significant irritation	Must be preheated before ignition can occur	Normally stable. High temperatures make unstable	W	Reacts violently or explosively with water and oxidizing
				OX	
0	No hazard	Will not burn	Stable		

INCIDENT INVESTIGATION AND REPORTING

Purpose

The purpose of this program is to put in place effective procedures for reporting, evaluating, and investigating reported incidents and non-conformance in order to prevent further occurrences.

Responsibilities

Responsibilities for incident investigation will be assigned to individuals prior to occurrence of an incident. Individual responsibilities for reporting and investigation must also be already in place and assigned prior to incidents.

RAWHIDE LEASING COMPANY, LLC Safety Manager

Ensures investigations are conducted in a timely manner, assists in the identification of corrective actions, and makes sure the corrective actions are carried out expeditiously.

Site Manager and Supervisors

- Investigates (or assists in) incident investigations,
- Ensures all incidents are corrected in order to comply with RAWHIDE LEASING COMPANY, LLC policy,
- Will assist RAWHIDE LEASING COMPANY, LLC injured employees to a medical provider for initial treatment.

Employees

- Immediately report any injury, job related illness, spill, or damage to any property to their immediate supervisor.
- If their immediate supervisor is unavailable, the employee will then immediately notify the project manager or next person higher up the chain of command. Employees who are eligible to be first responders will be trained and qualified in first aid techniques in order to help mitigate the degree of loss during the immediate post-incident phase.

Procedure

After rescue or response, actions to prevent further loss should immediately occur if the scene is safe. For example, maintenance personnel should be summoned to assess integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special equipment/response requirements such as safe rendering of hazardous materials or explosives employed.

Investigations of Incidents & Non-conformance

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformance from occurring in the future.

The following incident must be reported IMMEDIATELY to the employee's supervisor. If that person is not available then RAWHIDE LEASING COMPANY, LLC Safety Manager shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment, or assets,
- Work related injuries or illnesses,

- Any damage to property, including vehicle incidents,
- Hazardous chemical spillage, which includes loss of containment and contamination,
- Non-conformance to safety or environmental rules, policies, or standards.

The supervisor will notify all necessary individuals and agencies and then begin the incident investigation process.

In the case of a major injury or incident, the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Incident investigation will take place as soon as possible, while the facts are still fresh within the minds of everyone involved (i.e. witnesses). Take the opportunity to talk to all of those involved before they become unavailable or their memory fades. An incident investigation must be thorough and only focused with the cause and prevention. Administrative disciplinary action will be kept separate from the investigation process.

Equipment

All necessary equipment will be made available to aid in conducting a proper investigation. Equipment may include some or all of the following items:

- writing equipment such as pens/paper,
- measurement equipment such as tape measures and rulers,
- cameras, small tools, and audio recorder,
- PPE, flags, equipment manuals, etc.

The Safety Manager shall have a incident investigation kit prepared in advance to facilitate a thorough investigation.

Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

EXTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Owner Client	24 hrs	Yes
Injury Above Minor First Aid	911 / Site Medical Response / Owner Client	ASAP	Yes
As Required Injury Reporting	OSHA / Owner Client	Within 8 hrs	Yes
Fire / Explosion	911 / Site Fire Response / Owner Client	ASAP	Yes
Reportable Spill	Site Environmental / Owner Client	Within 24 hrs	Yes
Property/Vehicle Damage	Owner Client	Within 24 hrs	Yes

INTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Safety Manager	ASAP	Yes
Injury Above Minor First Aid	Safety Manager	ASAP	Yes
As Required Injury Reporting	President then Safety Manager	ASAP	Yes
Fire / Explosion	Safety Manager	ASAP	Yes
Reportable Spill	Safety Manager	ASAP	Yes
Property/Vehicle Damage	Safety Manager	ASAP	ASAP

Time Elements for OSHA and Client Notification

Required incidents must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the owner client as soon as possible or no longer than within 24 hours of the occurrence.

Incident Review Team and Incident Investigation Report

All incidents will be investigated according to levels of incident severity. While all incidents will be investigated, the extent of such investigation shall reflect the seriousness of the incident according to a root cause analysis process or other similar method approved and put in place by RAWHIDE LEASING COMPANY, LLC Safety Manager. An Incident Review Team that participates in the determination of the final root cause will be formed to aid investigative incident reporting. The team will consist of representatives of management, or other personnel assigned by RAWHIDE LEASING COMPANY, LLC Safety Manager.

Initial Identification/Assessment of Evidence

Initial identification of evidence immediately following the incident should include:

- the location of the incident, a listing of people on the scene,
- equipment, and materials involved,
- and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

Collection/Preservation and Security of Evidence

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured and collected through the use of notes, photographs, witness statements, flagging, and the seizing of documents and equipment. All evidence shall be dated appropriately.

Witness Interviews and Statements

Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed. All items shall be dated.

The final incident investigation report will consist of findings with critical factors, evidence, corrective actions, responsible parties, and a schedule for corrective action and timeline for completion.

Results of incident investigations are communicated to employees via the Incident Notice form.

Preparation of the Written Incident Report

Written incident reports will be prepared and will include the Field Incident Report Form along with a detailed narrative statement concerning the events. The format of the narrative report should include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included in the report.

The supervisor completes a RAWHIDE LEASING COMPANY, LLC Field Incident Report and takes the steps outlined below when beginning an incident investigation:

- Provide emergency assistance, as needed and if qualified to do so,
- Secure the area as quickly as possible to retain area in the same condition as the time of the incident,
- Notify management by phone according to the Incident Notification Matrix,
- Identify potential witnesses,
- Use investigation tools, as needed (camera, drawings, video, etc.),
- Secure by Lock out/Tag out any equipment involved, as evidence,
- Interview witnesses (including the affected employee) and obtain written, signed statements which will be faxed to the RAWHIDE LEASING COMPANY, LLC Safety Manager,
- Prepare a RAWHIDE LEASING COMPANY, LLC Field Incident Report, sign the form, and then fax it to the RAWHIDE LEASING COMPANY, LLC Safety Manager
- Implement any corrective actions needed immediately.

Incident Notice Form

RAWHIDE LEASING COMPANY, LLC shall provide documentation and communication of lessons learned and reviews of similar operations to prevent re-occurrence. Lessons learned are reviewed and communicated to the appropriate personnel. Changes to processes and procedures must then be put into immediate effect to prevent re-occurrence of similar events.

In order to communicate incident information and the lessons learned from them, RAWHIDE LEASING COMPANY, LLC Safety Manager shall send the Incident Notice to all work sites. The form shall be posted on all employee bulletin boards and shall be discussed in weekly safety meetings until all employees at the job site have been informed of both the incident and the corrective actions put in place.

Corrective Actions Resulting from Incident Investigations

Incident investigations should result in corrective actions. Individuals should be assigned responsibilities relative to the corrective actions, and should be monitored until all corrective actions have been implemented. The incident investigation and report can be closed after verifying the necessary corrective actions are now in place.

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by RAWHIDE LEASING COMPANY, LLC Safety Manager to ensure timely follow up and completion.

Corrective actions will also use as needed for revisions to site specific safety plans and RAWHIDE LEASING COMPANY, LLC wide Safety and Health Management System.

Injury Classifications

Injuries shall be classified per the following:

- First Aid – Dressing on a minor cut, removal of a splinter, or other such typical treatments for household type injuries,
- Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury,
- Number of Lost or Restricted Work Days – The number of days, excluding the day of injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked,
- Occupational Injury – An injury which results from a work related activity,
- Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work. The illness would result in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss, or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Minor treatments (first aid) for illnesses do not fall within this classification,
- Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) but does not result in lost work time beyond the day of injury,
- Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the actual day of injury. For example, an injured employee is kept at work but not performing the essential functions of their regular job,
- Work or Work Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable must be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface on the job but are the result of a non-work-related event or exposure that occurs outside the work environment,
- The injury or illness results from voluntary participation in a wellness program or a flu shot, exercise class, racquetball, baseball, or other such activities,
- The injury or illness is the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in).
- The injury or illness is the direct result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours,
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

Training

RAWHIDE LEASING COMPANY, LLC shall train all personnel in their roles, responsibilities, and in proper incident investigation techniques.

Training frequency will be based on the specific area of responsibility but will never be more than two years apart.

Training requirements relative to incident investigation and reporting shall include the following:

- Awareness,
- First Responder Responsibilities,
- Initial Investigation at the Accident Scene,
- Managing the Accident Investigation,
- Collecting and analyzing data,
- Developing Conclusions,
- Judgments needs, and
- Reporting the Results

INJURY & ILLNESS RECORDKEEPING

Purpose

The purpose of this program is to establish standards for recording RAWHIDE LEASING COMPANY, LLC injuries and illnesses and to comply with applicable regulatory requirements.

Scope

This program applies to all employees on all RAWHIDE LEASING COMPANY, LLC or client facilities.

Responsibilities

Safety Manager

- Implement this program and make supervisors aware of its requirements.
- Responsible for maintaining all records pertaining to this program.

Supervisors

- Ensure that all work related injuries and illnesses are promptly reported to the safety manager.
- Shall become familiar with the requirements of this program.

Employees

- Ensure that all work related injuries and illnesses are reported to your supervisor immediately.

Procedure

Written records of all work-related fatalities, injuries and illnesses must be kept to ensure accurate recordkeeping procedures. Therefore, RAWHIDE LEASING COMPANY, LLC shall:

- Use the following instructions and forms to record injuries and illnesses:
<http://www.osha.gov/recordkeeping/RKforms.html>
- Record all illnesses or injuries on the OSHA 300 log within 7 calendar days of receiving information that the injury or illness occurred.
- Post the OSHA 300A summary form in a place that is accessible and visible to employees from February 1st through April 30th.
- Maintain OSHA 300 records for at least 5 years.

* The OSHA 300A form shall be reviewed and signed by a RAWHIDE LEASING COMPANY, LLC official.

Posting Requirements

RAWHIDE LEASING COMPANY, LLC shall post the OSHA 300A summary form in a conspicuous place that is easily accessible and available to employees such as a lunchroom, time clock area or other effective common area.

Post the OSHA 300A summary form from February 1st through April 30th as per the OSHA recordkeeping requirements.

If the posted OSHA 300 summary form is defaced, altered or otherwise unreadable, it shall be replaced so that employees can effectively read the form information.

All OSHA recordkeeping forms shall be kept for at least 5 years as per the OSHA recordkeeping requirements.

LADDER SAFETY

Purpose

This program is designed to establish rules and requirements for the construction, maintenance and utilization of common ladder types.

All ladders installed on RAWHIDE LEASING COMPANY, LLC equipment, whether purchased or engineered, are subject to this program's requirements.

Scope

Procedures outlined in this program apply to all employees who use ladders. This document covers RAWHIDE LEASING COMPANY, LLC employees and contractors and shall be used on all RAWHIDE LEASING COMPANY, LLC owned and operated premises. When work is performed off-site, the agent's program has precedence unless it is less stringent than RAWHIDE LEASING COMPANY, LLC program.

Definitions

Ladder – a device consisting of side rails joined at regular intervals by rungs, steps or cleats, on which a worker may step in an ascending or descending motion.

Step ladder - a portable ladder that is self-supporting and nonadjustable length-wise. Steps are flat; the back is hinged. The size of a step ladder is designated by the length of the ladder when measured along the front edge of the side rails.

Single ladder – a portable, nonadjustable ladder with only one section. This ladder requires support. The length of the side rail denotes its size.

Extension ladder – a portable ladder consisting of two or more sections that can be adjusted length-wise by moving the sections along brackets. Its size is denoted by the sum of the lengths of all sections measured along the side rails.

Fixed ladder – a ladder that is permanently attached to equipment or a structure.

Individual-rung ladder - a fixed ladder with no side rails. Each rung is individually attached to a building, structure, or equipment.

Cage – an enclosure surrounding a fixed ladder designed to encircle the climbing space of the ladder to keep the climber safe.

Key Responsibilities

Managers and Supervisors

- It is the responsibility of all managers and supervisors to ensure that all employees and contractors are trained to use and inspect ladders according to the manufacturer's guidelines,
- It is the responsibility of all managers and supervisors to ensure that all employees and contractors are aware that any inspected ladder found to have a defect may not be used and must be taken out of service.

Employees

- Employees are responsible for inspecting ladders before, during and after each use to make certain the condition of the ladder is safe for its occupants,
- Employees are responsible for following the procedures outlined in this program,
- Employees are responsible for reporting damage or needed repairs to the supervisor.

Procedure

Inspection, Care and Safe Work Practices of Ladders

Inspection

Ladders must be inspected for visible defects by a qualified person periodically and after any incidents that may affect the safe use of the ladder.

- Ladders must have uniformly spaced rungs or meet OSHA/ANSI specifications for rungs. These rungs, steps or cleats must be parallel and level while the ladder is positioned for use,
- Any portable or fixed ladder that is found to have structural defects must immediately be marked in such a way that identifies the ladder as defective, or tagged with a "Do Not Use" sign and removed from service until repaired. These structural defects include, but are not limited to: broken rails, corrosion, broken or missing rungs or other faulty parts,
- Ladders that are tipped over must be inspected by a qualified person for dents and bends in the side rails or unusually dented rungs. Hardware connections, rivets and connections between rungs and side rails shall also be inspected at this time,
- Use of ladders with broken side rails, broken or missing steps, or other defective equipment is strictly prohibited. Employees are not permitted to make improvised repairs to these ladders,
- Wooden ladder parts must be free from splinters and sharp edges, free from shake and free from other irregularities.

Care

Ladders must be well-maintained at all times.

- The joints between steps and side rails must be tight with all hardware and fittings attached securely,
- Movable parts must operate freely without play or binding in the movement,
- Metal bearings in locks, pulleys, wheels, etc. must be lubricated frequently,
- Rope must be replaced when it is frayed or badly worn,
- Auxiliary equipment and safety feet must be kept in good condition,
- Rungs must be clean of grease and oil,
- Ladders must be stored in areas that are well-ventilated to avoid sagging and warping.

Ladder Safe Work Practices

Ladders must only be used for their intended purposes.

Ladders are required to be secured at the top or held in place by a person standing at the base.

Ladder footing must be placed on a level, stable surface.

Extension ladders are to be placed in a 4:1 ratio. Non-self-supporting ladders are to be used at an angle to ensure that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder (the distance between the foot and top support).

If a ladder cannot be extended, the ladder must be secured at the top to a strong support that will not allow the ladder to bend or veer.

Ladders must never be placed on unstable bases, such as boxes or barrels, in order to get additional height.

Ladders may not be placed in a horizontal position to be used as runways, scaffolds or platforms.

Only one person shall occupy a ladder at any given time.

Ladders must not be placed in a doorway wherein the door opens toward the ladder unless the door is locked, guarded, or blocked open.

Ladders used in high traffic areas must be barricaded to avoid accidents and collisions.

Ladder occupants are not permitted to stand on the top two rungs of a ladder or on the top of a step ladder.

The minimum overlap during the use of two-section extension ladders is as follows:

Size of Ladder (feet)	Overlap (feet)
Up to and including 36'	3
Over 36' up to and including 48'	4
Over 48' up to and including 60'	5

Ladders must extend at least three (3) feet above the top of the upper landing surface. Side rails must extend a minimum of three (3) feet above the upper landing surface. When ladders cannot be extended, the top of the ladder must be secured to a rigid support to prevent movement.

Employees must keep a three (3) point grip on the ladder at all times. Tools and equipment must be carried up on a hoist or belt. Employees are prohibited from carrying anything in the hands that could result in a fall or injury.

Employees must face the ladder when going up or down the ladder.

Employees shall not climb on the back legs of stepladders; these are designed for increased stability, not climbing.

No person may move a ladder while it is occupied.

Portable Ladders

Length of stepladders shall not exceed 20 feet. Single ladder length shall not exceed 30 feet.

Two-section extension ladders shall not exceed 60 feet in length. All two-section ladders are designed with sections that fit together and are arranged to enable the upper section to be raised and lowered.

Ladders must be kept a minimum of 10 feet away from power lines.

Ladders must have the appropriate load capacity for the task at hand. Ladders may not be loaded beyond the maximum recommended load for that ladder, nor in excess of the capacity as rated by the manufacturer. Weight consists of the combined weight of the climber and his equipment:

- I (250 lbs capacity)
- I-A (300 lbs capacity)
- II (225 lbs capacity)
- III (200 lbs capacity)

Fixed Metal Ladders

Ladders must be made to withstand a minimum of 200 pounds.

Metal rungs must have a diameter of at least $\frac{3}{4}$ inches; wooden rungs must have a diameter of at least 1 $\frac{1}{8}$ inches.

The distance between rungs shall not be more than 12 inches (1 ft.) apart and must be uniform along the length of the ladder.

Rungs must be at least 16 inches long and provide protection to prevent a foot from slipping off the end.

A rung must have at least seven (7) inches between itself and the structure behind it.

Employees must use fall restraint systems when on fixed ladders exceeding six (6) feet in length,

- A cage is required if the ladder is 20 feet tall or greater,
- Cages on fixed ladders must be positioned at least seven (7) feet but no more than eight (8) feet from the walking surface below the cage,
- Cage widths must clear 15 inches on either side of the centerline of the rung,
- Cages must not extend less than 27 inches or greater than 28 inches from the rung's centerline,
- Fall restraint systems may be used in place of ladder cages.

LOCKOUT TAGOUT PROGRAM

Purpose

This program establishes policies and procedures for attaching suitable lockout/tagout equipment to energy isolated devices. Procedures will also be established to disable equipment to prevent unintended start up, energization or release of stored energy that may cause accidents or injury.

Scope

The procedures outlined in this program cover the maintenance and servicing of equipment and machines where unintentional energization or start-up of said equipment, or the release of stored energy, could result in an accident. Minimum performance standards for the control of hazardous energy shall be established. Work performed offsite is regulated by the site operator's program unless it is less stringent than the RAWHIDE LEASING COMPANY, LLC program. This document covers all RAWHIDE LEASING COMPANY, LLC contractors and employees and must be used on RAWHIDE LEASING COMPANY, LLC owned premises.

Definitions

Affected employees – Employees who operate or use machines and equipment that require maintenance and service under the lockout/tagout program, or employees who work in areas where maintenance and servicing of such equipment is performed.

Authorized employees – Employees that conduct lockout/tagout operations on machines and equipment so as to service or perform maintenance on that equipment. Affected employees become authorized employees when their duties include performing service or maintenance as prescribed in this program.

Energy source – Any source of electrical, chemical, thermal, gas, mechanical, pneumatic, hydraulic, tension, gravitational, electrical or other energy source.

Energized – Having connection to a source of energy or containing stored or residual energy.

Energy isolating devices – Mechanical devices that prevent energy from being transmitted or released. Energy isolating devices include, but are not limited to:

- Manually operated electrical circuit breakers, manually operated switches that prevent conductors and poles from being independently operated, disconnect switches, line valves, blocks and any other devices used to isolate or block energy,
- The following are not isolating devices: selector switches, push buttons and other control circuit type devices.

Hot tap – Welding on equipment under pressure (pipelines, tanks or vessels) to install connections or other accessories. This procedure is used in maintenance, service and repair of said equipment.

Lockout – Placing a lockout device on an energy isolating device to make sure that the device and controlled equipment is inoperable until the lockout device is removed.

Lockout device – A device that uses a key or combination lock to fix an energy isolating device in a safe position to prevent start up and energizing of the equipment. This includes bolted slip blinds and blank flanges.

Capable of being locked out – Energy isolating devices are able to be locked out if that particular device has a hasp or other attachment for attachment of a lock, or if the device has a locking mechanism built in. Other energy

isolating devices can be locked out if lockout can be performed without dismantling, rebuilding or replacing the device or permanently altering its energy control capabilities.

Tagout: - Using established procedures to place a tagout device on an energy isolating device. This is used to indicate that the energy isolating device and the controlled equipment cannot be used until the tagout device is safely removed.

Tagout device – A warning device, such as a tag and a means of attaching it, located in a prominent area and securely attached to an energy isolating device according to these established procedures. This is used to indicate that the energy isolating device and the controlled equipment cannot be used until the tagout device is safely removed.

Normal operation – Using a machine or piece of equipment as it is intended.

Servicing and/or maintenance – Activities such as setting up, constructing, inspecting, adjusting, modifying, maintaining, or servicing machines and equipment in environments where the employee is potentially exposed to release of hazardous energy sources or accidental start up or energization of equipment.

Setting up - Any work performed to prepare a machine or equipment for performing its normal operation.

Key Responsibilities

Managers/Supervisors

- Responsible for maintaining and enforcing this program,
- Ensure that all employees and contractors affected by the lockout/tagout program have the required training and competency to ensure the safe installation, utilization and removal of all energy controls and devices,
- Ensure employees are in compliance with the requirements set forth in this program.

Employees

- Affected employees are required to attend annual training for the lockout/tagout program,
- Responsible for following all requirements and provisions of the program.

Procedure

General

Only employees authorized to perform service or maintenance under this program are permitted to perform lockout or tagout.

Devices

Lockout Device – If it is possible for an energy source to be locked out to hold an energy isolating device in a safe position, a device that utilizes a lock will be used. The RAWHIDE LEASING COMPANY, LLC will specify the type of lock and will provide them to each site.

Tagout Device – If an energy source cannot be locked out, a tagout device must be used. Tagout devices are only warnings and must be resistant to chemicals and weather, of the standardized color with a clear written warning of hazardous energy. Examples of tags include: Do Not Start, Do Not Operate, Do Not Energize, etc. The RAWHIDE LEASING COMPANY, LLC will provide each site with the same standardized style of tags.

Specific Energy Control Procedures

Each supervisor or manager is responsible for the development of site specific step-by-step startup and shutdown procedures for each type of machine and piece of equipment in their respective areas. Periodic inspections of the energy control procedure will be conducted and documented annually to ensure procedures and requirements are being followed.

- Written, step-by-step isolation procedures detailing shutdown and startup will be put together for each type of equipment or machine,
- These procedures will include the following:
 - Assigned equipment number, if applicable,
 - Location of equipment,
 - Source of energy (e.g., hydraulic, electrical, gas, etc.),
 - Isolating controls location (e.g., valves, breaker switches, etc.),
 - Number of isolating controls
 - Number of locks required to isolate the piece of equipment
 - Hardware required to isolate the equipment (e.g., blocks, valve covers, chains, etc.),
 - Information regarding any residual energy that must be expended prior to beginning work.

Specific Sequence for Application of Energy Control

- *Notification* – Authorized employees are required to notify affected employees when lockout/tagout devices are put on or removed prior to the controls being implemented.
- *Preparation for Shutdown* – Prior to an authorized or affected employee shutting down a piece of equipment or machinery, the authorized employee must know the energy's type and magnitude, the potential hazards of the energy to be controlled, and the method or device required to control the energy source.
- *Shutdown of Machines and/or Equipment* – Machinery and equipment must be shut down using the established procedures in this program for that particular type of machine or equipment. Shutdown must be conducted in a safe and orderly fashion to prevent additional hazards to employees as a result of the shutdown.

- *Isolation of Machines or Equipment* – When energy isolating devices are required to control energy, the device will be placed and used in such a manner as to isolate the machine or piece of equipment from the energy source.
- *Lockout/Tagout Devices and Application*
 - Authorized employees will have the appropriate number of locks and devices to enable them to perform lockout/tagout procedures for machines or equipment they are working on,
 - Lockout/tagout devices will be attached to energy isolating devices by authorized employees,
 - Each lockout/tagout device will include the name of the person who placed the device,
 - Lockout devices will be placed in such a way as to hold the energy isolating device in a safe or off position,
 - Tagout devices will be placed in such a way that will clearly indicate that operating or moving the isolating device from the safe or off position is not permitted,
 - When using tagout devices on energy isolating devices that could be locked out, the tagout device shall be attached at the same point the lock would have been attached. If a tag cannot be attached directly to the energy isolating device, it will be placed as closely as possible to the device in a safe position that will immediately alert anyone who attempts to operate the device,
 - Each source of energy must be locked out, completely isolating the equipment,
 - Isolating machines or equipment include, but are not limited to:
 - Pumps, generators, compressors, storage tanks, electric distribution, etc.,
 - Each type of isolated equipment will have its own specific procedures for isolation. For example, to isolate compressors: suction, discharge, power, starting, fuel and dumps must be closed, locked and tagged out properly. The blow-down valve must be opened, locked, and tagged out. NOTE: If the compressor has a side stream, the side stream must also be closed, locked and tagged out properly.
- *Stored Energy and the Possibility of Re-accumulation* – After lockout/tagout devices are affixed to energy isolating devices, all potentially hazardous stored or residual energy must be restrained, relieved or disconnected and rendered safe in some manner. If re-accumulation of stored energy is a possibility, isolation will be verified until the equipment receives service or maintenance or until the possibility of re-accumulation does not exist.
- *Verification of Isolation* – The authorized employee who performs the lockout procedure must verify that the equipment is disconnected or isolated from the source of energy by:
 - Checking that no personnel are exposed,
 - Verifying the isolation of the equipment by operating the controls, or
 - Testing to ensure the equipment is inoperable.

Multiple Workers & Group Lockout

Crews of authorized employees can use group lockout/tagout devices, which will provide the same level of protection as a personal lockout or tagout device. The authorized employee has primary responsibility for all employees working under the protection of a group lockout or tagout device.

- A short tailgate meeting will be held to go over the lockout procedures and other information needed to continue to work safely. All affected departments are required to participate,
- Isolation of the equipment will be performed by an authorized employee who must also determine the exposure status of the individuals in the group,
- All individual members will put their individual locks on the group's lockout or tagout device after they have verified the procedure,
- The crew leader or other designated authorized employee will be responsible for ensuring consistency of the lockout procedures including documenting lockout information to be passed along during shift or personnel changes.

Release from Lockout/Tagout

Upon completion of service or maintenance, or when lockout/tagout devices are removed temporarily, the equipment must be tested to determine whether the equipment is ready to return to its normal operations. The following steps must be taken, in this order, to assess and prepare the equipment:

- Check the piece of equipment and its surrounding area to make sure that all extraneous items have been removed and that the components of the equipment are intact for operation,
- Ensure that all personnel in the work area have been removed from or safely positioned in the area,
- Remove the lockout/tagout device,
- Energize and begin testing,
- De-energize and reapply controls and lockout/tagout devices,
- Use the completed isolation log to document the procedure. Provide this documentation to the supervisor to be filed.

Lock Removal

The authorized employee who puts the lock on should be the one to remove the lock. Certain conditions may be encountered which prohibit this person from being present to remove the lock after the work is completed. The following procedures must be adhered to when removing the lock that another person has applied:

- Try to contact the authorized employee who put the lock on in order to obtain the key(s),
- If the key cannot be obtained, the employee who requires the lock to be removed must contact their supervisor,
- The supervisor must confirm that every effort was made to contact the employee who applied the lock,
- It shall be noted on the Service Report that the lock(s) were taken off with the permission of the supervisor,
- The supervisor will make a reasonable effort to notify the employee that their lock has been removed to ensure the worker has knowledge of the same before returning to work,
- If the equipment is owned by a client, the supervisor or employee requiring the lock's removal must contact the client to have the lock removed,
- Clients must remove their own lock(s). NOTE: RAWHIDE LEASING COMPANY, LLC employees are not permitted to remove any client locks.

Personnel or Shift Changes

When personnel or shifts change during the maintenance or repair of equipment, the designated person in charge is responsible for ensuring the continuity of the lockout/tagout procedures. This includes ensuring that all procedures are strictly followed and that the required transfers of lockout/tagout devices between authorized personnel is achieved.

Contractors

Contractors who perform lockout procedures on RAWHIDE LEASING COMPANY, LLC owned or leased property must comply with these procedures. Contractors are responsible for supplying their own locks.

The RAWHIDE LEASING COMPANY, LLC will initially lock out its own equipment. The contractor's lock will be used in addition to the lock provided by the RAWHIDE LEASING COMPANY, LLC.

Annual Audits

The manager, supervisor, or designee will perform an annual evaluation of the Lockout Program in their respective areas to assess the program's effectiveness. An authorized employee (other than the person performing the energy control procedure) will conduct the audit and confirm that:

- All affected and authorized employees have received the required training,

- Specific lockout procedures have been developed and documented in writing for each new piece of equipment,
- Procedures currently in place adequately address completely isolating equipment in order to obtain a zero energy state,
- Annual audits must be certified in writing. A copy of the audit will be filed and maintained in the supervisor's office.

TRAINING

Training will be provided by the RAWHIDE LEASING COMPANY, LLC to verify that the purpose and implementation of the energy control program are understood by employees and that they have acquired the knowledge and skills necessary to safely apply, use, and remove the energy controls. Training will include the following:

- Identification of relevant hazardous energy sources, the magnitude and type of energy present in the workplace and the procedures necessary for the isolation and control of energy,
- The purpose and utilization of procedures to control energy,
- When using tagout systems, authorized employees will be trained in these tag limitations:
 - Tags are warning devices attached to energy isolating devices. Tags do not provide the same physical hold that is provided by a lock,
 - Tags attached to energy isolating devices are not to be removed without prior authorization of the person responsible for it,
 - Tags must be legibly written and easily understood by all authorized and affected employees and other personnel in the work area,
 - Tags and tag attachments must be constructed of materials that can withstand the environmental conditions in which they will be placed,
 - Tags will be securely affixed to the energy isolating devices to prevent against accidental detachment,
 - The meaning of tags should be understood to avoid evoking a false sense of security regarding their effectiveness in the overall energy program.

Other personnel whose work operations are in or near areas where energy control procedures are necessary must be instructed about this procedure. They must also be informed about the prohibitions regarding restarting or re-energizing locked out or tagged out equipment.

Retraining

Retraining will be conducted when:

- An inspection reveals deviations from the use of or inadequacies in the employees' knowledge of the energy control procedures,
- The RAWHIDE LEASING COMPANY, LLC has reason to believe there are deviations from the use of or inadequacies in the employee's knowledge of the energy control procedures,
- There is a change in machines, energy control procedures or in job assignments,
- A new hazard is introduced.

Retraining will validate the proficiency of the employees and introduce new or revised control procedures when necessary.

Training Documentation

The RAWHIDE LEASING COMPANY, LLC will verify that the required employee training has been completed and is kept up to date. All training and retraining must be documented, signed, certified and kept on file.

NOISE EXPOSURE & HEARING CONSERVATION

Purpose

This program is designed to establish requirements to reduce hearing loss of employees exposed to excessive occupational noise.

Scope

All employees who are at risk of exposure to noise levels greater than 85 decibels are subject to the procedures and requirements of this program. This program covers RAWHIDE LEASING COMPANY, LLC employees and contractors and will be used on all company owned premises. When performing work offsite, that operator's program takes precedence over this one unless there is no program or it is less stringent.

Key Responsibilities

Safety Manager

- Shall ensure that all supervisors and managers are aware of and comply with this program.

Managers and Supervisors

- Shall ensure that employees comply with the requirements of this program
- Shall ensure that employees are not exposed to noise that could be harmful to the employees.

Employees

- Shall abide by all safety rules, attend required training and comply with the requirements of this program.

General Requirements

Anytime a work environment presents a noise hazard, which is 85 decibels, or higher; a hearing conservation program shall be developed and implemented. In addition to this requirement, the following criteria shall be met:

- Audiometric surveys shall be conducted only by a qualified person or qualified third party.
- Personal Protective Equipment (PPE) such as hearing protectors shall be made available to affected employees at no cost to the employee.
- Each employee shall be given an opportunity to select their hearing protection from the employers selection.
- Affected employees shall always wear hearing protection where noise levels are greater than 85 decibels.
- Signs which are clearly identified shall be posted at entrances where noise presents a hazard or is above 85 decibels.

Monitoring Requirements

RAWHIDE LEASING COMPANY, LLC shall ensure that monitoring procedures are used when exposure limits exceed the established level. Noise monitoring basic requirements include but are not limited to the following:

- An audiometric testing program shall be established and maintained for all employees whose exposures equal or exceed the 8-hour time-weighted average of 85dbA.
- A baseline audiogram shall be established for each exposed employee within 6 months of first exposure.
- Prior to the establishment of a baseline audiogram, at least 14 hours without exposure to workplace noise shall be observed.
- RAWHIDE LEASING COMPANY, LLC shall provide an annual audiogram and if a standard threshold shift has occurred, the employee shall be notified in writing within 21 days of determination.
- If a standard threshold shift occurs, hearing protection shall be re-evaluated and/or refitted and a medical evaluation shall be performed if necessary or required.

Personal Protection Equipment (PPE)

RAWHIDE LEASING COMPANY, LLC shall make PPE such as hearing protectors or other hearing protection devices available to all employees who are or may be exposed to an 8-hour time-weighted average of 85 decibels at no cost to the employee. Evaluation of hearing protector attenuation for specific noise environments shall be performed in order to ensure adequate protection for affected employees.

Training & Education

All affected employees shall receive noise exposure or hearing conservation training initially before the noise exposed work commences and annually thereafter. Training shall also be updated to be consistent with changes in the PPE and work processes that include instruction on the proper use and fit of hearing protectors.

Records & Documentation

All noise related records and documentation shall be maintained permanently by RAWHIDE LEASING COMPANY, LLC. This includes audiometric testing documentation generated by qualified persons or third parties.

Injury and illness records related to noise shall be maintained by RAWHIDE LEASING COMPANY, LLC for at least 10 years after the termination of affected employee's employment with RAWHIDE LEASING COMPANY, LLC.

PPE PROGRAM

Purpose

The purpose of the Personal Protective Equipment program is to establish procedures for using and maintaining personal protective equipment that must be used by employees in order to prevent injuries.

Scope

This program applies to all RAWHIDE LEASING COMPANY, LLC employees. It is to be used at all times on RAWHIDE LEASING COMPANY, LLC worksite. If an RAWHIDE LEASING COMPANY, LLC employee performs work on a site other than RAWHIDE LEASING COMPANY, LLC's site, the facility owner's plan should be used if it exists and is as strict (or more strict) than this plan. In cases where the other facility's plan does not exist or is less strict than this plan, RAWHIDE LEASING COMPANY, LLC employees will operate under this plan.

Key Responsibilities

SAFETY Manager

- Helps to select appropriate PPE. Some work tasks expose employees to hazards that cannot be eliminated by means of engineering or administrative controls. In these cases, the SAFETY Manager assists the supervisor and project manager in identifying and selecting suitable PPE based on the task being performed, the work conditions, and the frequency and duration of the exposure. RAWHIDE LEASING COMPANY, LLC employees provide feedback to the supervisor regarding the fit, comfort, and suitability of the PPE to be used. The reasons for the PPE selected are provided to the employees.
- Assists the supervisor and site manager to ensure the PPE obtained meets the requirements of this program and applicable regulations
- Conducts Worksite Hazard Assessments - This assessment must determine whether hazards exist or are likely to exist, that require the use of PPE. Hazards may include those related to: high/low temperatures, impact/motion, sharp objects, falling objects, rolling or pinching objects, chemicals, materials, radiation, electrical hazards, and general workplace layout. The SAFETY Manager documents the tasks that were evaluated, hazards that were discovered and the PPE required to protect employees. They also ensure that affected employees are aware of hazards and the required PPE prior to being assigned to the hazardous task. The documents are certified and include the certifier's name, signature, and dates, and identifies the assessment documents.

Managers and Supervisors

- Managers and supervisors regularly monitor employees to ensure PPE is being properly used and cared for. They also ensure employees receive follow-up training if required so they have the adequate knowledge, skill, and ability to use PPE.
- Managers and supervisors will use RAWHIDE LEASING COMPANY, LLC progressive discipline to enforce PPE safety rules and ensure that the Required PPE Poster is properly posted.

Employees

- Properly use and care for PPE.
- Report any changes in exposure that may necessitate a re-assessment of the task for PPE.
- Report and replace defective or damaged PPE. Never use defective or damaged PPE.
- You must wear the required PPE. Failure to do so could result in termination of employment.

Procedure

General

RAWHIDE LEASING COMPANY, LLC will provide protective equipment, including personal protective equipment (for head, eyes, face, and extremities), respiratory devices, protective clothing, and protective shields and barriers. This protective equipment must be used wherever injury or impairment of function of any body part (through absorption, inhalation or physical contact) is likely that because of process or environmental hazards, radiological hazards, chemical hazards, or mechanical irritants. All PPE shall be provided, used and maintained in a sanitary and reliable condition.

Employees are NOT allowed to use employee-owned equipment, except prescription safety glasses and safety footwear. RAWHIDE LEASING COMPANY, LLC must ensure that employee-owned safety glasses and footwear are adequate, and RAWHIDE LEASING COMPANY, LLC will maintain and clean them.

Defective or damaged equipment shall not be used and must be tagged or destroyed and replaced.

All issued personal protective equipment will be cost-free to the employee. All employees must understand and follow the procedures identified in this program.

Eye Protection

When exposed to facial or eye hazards from flying fragments, chemicals, acids or caustic liquids, melted metal, or chemical gases or vapours, employees must use the required eye or face protection. PPE used to protect the eyes and face must be in compliance with ANSI Standard Z87.1-2003 (Z87+), *Occupational and Educational Personal Eye and Face Protective Devices*.

Safety Glasses

While on RAWHIDE LEASING COMPANY, LLC property, employees, subcontractors, and visitors must at all times wear safety glasses with side shields that meet ANSI Z-87.1-2003 standards with "high Impact lenses". Requirements as described below:

- In shops and warehouses, and at field locations, except in striped safety zones that have been designated and approved.
- In all yard work zones. Everyone in the vicinity of loading or unloading equipment. All employees who perform mechanic or maintenance work, operate equipment (e.g., forklift and welding), test stand operations, or do any work that may potentially cause an eye injury.
- In a restroom, office, or any other building when performing work that may potentially cause an eye injury.
- RAWHIDE LEASING COMPANY, LLC will provide with visitor glasses. If approved prescription safety glasses are not available for an individual, they must wear "Over the glass" type safety goggles or glasses over their regular prescription glasses until they obtain approved prescription safety glasses.
- When assisting welders, employees must wear absorbent safety glasses to protect the assistant from ultra-violet (UV) and/or infrared rays (IR).
- No employee is allowed to wear dark shaded lens (sunglasses) darker than # 1 shade unless welding or assisting a welder.
- The requirement to wear safety eyewear will be exempt only based on a written "exceptions for medical reasons" from a doctor.
- Employees are not required to wear safety glasses:
 - Inside an office.
 - In parking lots when traveling to and from vehicles, or office buildings using main doors that do not enter shops.

Goggles

- When handling or mixing liquid chemicals, solvents, paints, etc., employees must wear chemical splash proof goggles as recommended on the Material Safety Data Sheet for the material being handled.
- When blowing equipment down with air the employee must wear dust proof goggles. They must also be worn when the employee is performing a job task where safety glasses do not do an adequate job of preventing airborne particles from entering the openings around the lenses and side shields.

Face Shields

- When operating a hand held or immobile grinder with a wire or abrasive wheel the employee must wear a full face shield over safety glasses. The full face shield must also be used when chipping paint or concrete. Also, when performing job tasks where flying objects may potentially strike the face, if safety glasses or goggles do not provide adequate protection, the employee must wear a full face shield over safety glasses.

Head Protection

When working in areas where a head injury is possible due to employee initiated impact, or impact from falling or other moving objects, employees must wear protective helmets. Helmets must be in compliance with ANSI Standard Z89.1-1997 Class E, *American National Standard for Industrial Head Protection* for Type II head protection, or must be equally effective.

- Hardhats must be worn when working in areas where head injury is possible from falling objects.
- Hardhats must be worn at all warehouse, field, and shop locations, or any location where it is determined to be necessary as per the location's PPE Hazard Assessment.
- Never alter hardhats in any way.
- Never paint or apply unauthorized stickers, name plates, etc. on hardhats.
- Never drill, cut, bend, or apply heat to a hardhat.
- Never alter the suspension system of a hardhat.
- Employees must inspect hardhat regularly for chips, scratches, cracks, signs of heat exposure (sun cracks), etc.
- Immediate replace any defective hardhats.
- Never place a hardhat in the rear window of a vehicle (they will be exposed to the sun or may become a projectile in a vehicle accident).
- Hardhats must be made available to visitors.
- RAWHIDE LEASING COMPANY, LLC must provide hardhats.
- RAWHIDE LEASING COMPANY, LLC will train employees in the use, care and maintenance of head protection equipment.

Hearing Protection

While in posted "High Noise" areas, all employees, subcontractors, and visitors must wear hearing protection. See the RAWHIDE LEASING COMPANY, LLC Hearing Conservation Program for additional information.

All areas that are known, or suspected to have, noise levels in excess of 85 dBA (constantly or intermittently) must have warning signs posted.

When noise caused by machinery, tools, etc., prevents normal conversations to be clearly heard, employees shall wear hearing protection even if warning signs are not posted.

General rule of thumb: If you must yell to be heard, you require hearing protection.

Types

- Preformed Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hard hat mounted

- RAWHIDE LEASING COMPANY, LLC will supply ear muffs and ear plugs employees in sizes and configurations that are comfortable for the employee.

Care and Maintenance

- Employees must inspect hearing protection before each use.
- Keep hearing protection clean to prevent ear infections.
- Discard disposable ear plugs when they become dirty, greasy, or cracked.
- Replace any ear muffs that have cracked seals, deteriorated foam inserts, or are defective.

Fit

- Because everyone is different, hearing protection must be selected for the individual. The employee must try a variety of styles to find one that is comfortable and provides adequate protection.
- RAWHIDE LEASING COMPANY, LLC will instruct employees in how to obtain the proper fit.

Hand Protection

Gloves

- When performing work tasks that may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals, employees must wear gloves.
- Welding: When performing arc welding or oxy/gas cutting, employees must wear welding gloves made of leather or other heat resistant materials.
- Chemical: When handling chemicals that specify gloves as PPE, the employee must impervious (chemical resistant) gloves.
- To select the correct glove type, refer to the specific chemical's Material Safety Data Sheet.
- Employees who work with chemicals, i.e., solvent vats, will be issued their own gloves for hygienic purposes.
- Leather: When working with sharp materials, or when handling rigging equipment, employees must wear leather gloves.
- Cloth: When handling objects or materials that could cause blisters, splinters, cuts, etc., the employee must wear cloth gloves.
- Heat Resistant: When handling hot bearings, races, or other materials or objects (heated beyond room temperature), employees must wear heat resistant gloves.
- Insulated: To prevent frostbite in extreme cold climates, employees must wear insulated gloves.
- Glove Inspections
 - Prior to each use, inspect gloves for holes, tears, and worn areas.
 - Periodically air test chemical gloves for pinholes by tightly twisting the cuff, expand the glove by applying low air pressure, and submersing the glove in water to check for bubbles.
 - Immediately discard any defective gloves.
- Exception: While working with rotating machinery, machinists are exempt from wearing gloves.

Foot Protection

All employees with regular duties at field locations, in shops and warehouses must wear safety footwear.

- Visitors and office workers entering these areas infrequently are not required to wear foot protection as long as they stay away from the work being performed.
- If visitors or office workers must be in the close proximity to the work, the work must be stopped while in the area or safety footwear must be worn.
- When in shops, warehouses, field locations and parts departments, employees must wear leather or equivalent boots (lace up or pull up).
- Boots must provide ankle protection, and have must have soles that are designed to protect the feet from punctures, and must have defined heels for climbing ladders.
- When job tasks there is a risk of equipment or material crushing the foot, toe guards must be worn.
- Safety footwear must comply with ANSI Z41-1999 standards.

- Some client locations may require everyone to wear safety footwear. Before visiting field locations, check with the local supervisor for client requirements.

Fall Protection

When performing certain elevated jobs (over six feet), employees must use personal fall protection. Refer to the RAWHIDE LEASING COMPANY, LLC Fall Protection Program.

Electrical Protection

Refer to the RAWHIDE LEASING COMPANY, LLC Electrical Safety Program.

Worksite Hazard Assessment

Hazard assessments must be performed, signed and documented. If it is determined that a hazard exists or is likely to exist, a PPE must be used. Following are some hazard sources that may be identified:

- High or low temperatures
- Chemical exposure (see MSDS for guidance)
- Flying fragments, melted metal or other face, eye, or skin hazards
- Falling objects, or the possibility of dropping an object
- Employee falling from a height in excess of 6'
- Sharp objects
- Rolling or pinching that could crush hands or feet
- Electrical hazards

Anytime that these hazards may cause injury to employees, PPE must be selected to eliminate or substantially reduce the potential for injury. Employees will be notified for the selection and reason.

Each affected employee will be apprised of the results of this assessment, and a copy of the assessment will be kept at the local office.

Each affected employee must be fitted with the selected/identified PPE. The Training section of this program addresses fitting (including proper donning, and doffing), cleaning and maintenance of PPE. All PPE use exemptions must be supported by the PPE hazard assessment.

Monitoring

Site managers and supervisors must monitor worksite tasks to identify changes in hazards, or the introduction of new hazards. If the site manager or supervisor discovers a new hazard, they must advise the SAFETY Manager. The SAFETY Manager conducts a hazard assessment for appropriate PPE for the new hazard.

The SAFETY Manager monitors how effective the PPE Procedure is, and recommends improvements to management.

Training

RAWHIDE LEASING COMPANY, LLC will train all employees who may need to wear PPE. Each affected employee must be fitted for PPE as required. Training will include:

- When it is required to use PPE.
- What type of PPE is required.
- How to put PPE on, take it off, adjust it and wear it.
- PPE limitations.
- How long PPE is useful, and how to dispose of it.
- How to clean and maintain PPE in to ensure it is sanitary and in reliable condition.
- How to report and replace defective or damaged PPE. Never use defective or damaged PPE.

Retraining

Retraining is necessary when:

- There are changes to workplace the workplace that makes the previous training obsolete.
- There are changes in the type of PPE.
- The employee shows improper use, a lack of use, or insufficient skill or understanding in selecting PPE, the necessity of PPE, the use of PPE and its limitations.

Documentation

Records of training will be kept at the local office. The training record will include:

- The name of the employee(s) trained;
- The training dates; and
- The subject of the training.

RIGGING / MATERIAL HANDLING PROGRAM

Purpose

This program ensures onshore and offshore lifting operations are safe and incident free.

Scope

This program applies to all RAWHIDE LEASING COMPANY, LLC employees that work onshore, or in the Outer Continental Shelf (OCS). It is to be used at all times on RAWHIDE LEASING COMPANY, LLC worksite. If a RAWHIDE LEASING COMPANY, LLC employee performs work on a site other than RAWHIDE LEASING COMPANY, LLC's site, the facility owner's plan should be used if it exists and is as strict (or more strict) than this plan. In cases where the other facility's plan does not exist or is less strict than this plan, RAWHIDE LEASING COMPANY, LLC employees will operate under this plan.

Definitions

Rigging - the process of safely lifting a load by attaching it to a hook using appropriate slings and related hardware.

Qualified Rigger – anyone who has successfully completed training that meets the requirements set forth by American Petroleum Institute's Recommended Practice 2D 5th Edition (API RP-2D 5th Edition) and attaches or detaches lifting equipment.

Outer Continental Shelf – all submerged lands, subsoil, and seabed that belong to the United States (federal) and lie seaward and outside of the individual states' jurisdiction (land beneath navigable waters are in the jurisdiction of the individual states).

Key Responsibilities

Management determines whether this program is necessary to comply with regulations within their region. If the program is necessary, management determines which employees are required to take this training. Management may select a training facility, or may use an in-house qualified trainer to conduct the training.

Supervisors assist the managers in completing the above tasks. The supervisor must verify that each employee has the appropriate training before reporting for duty onshore, or on an OCS facility.

Employees must follow safe rigging practices, and will assist their supervisor in tracking required training. Employees will be aware of expiration dates of required training, and will notify their supervisor in advance of expiry.

Attaching or detaching lifting equipment to loads (or lifting loads) must only be performed by qualified, trained rigger employees. RAWHIDE LEASING COMPANY, LLC employees never operate nor inspect offshore cranes.

Procedure

General

"Qualified riggers" are the only employees allowed to attach loads to a lifting hook. "Qualified operators" are the only employees allowed to operate a crane while involved in lifting operations onshore or on the OCS.

API RP-2D has developed a classification system with three-tiers. Before starting any job assignment requiring rigging and lift operations offshore, employees must be certified in the required classifications:

- Qualified rigger.
- Qualified inspector.
- Qualified operator. (RAWHIDE LEASING COMPANY, LLC employees DO NOT operate offshore cranes.)

Material Handling

- Rigging equipment must be inspected to ensure its safety. Prior to using rigging equipment for material handling, the equipment must be inspected. In addition, it must be inspected on each shift and as necessary during its use.
- Rigging equipment that is determined to be defective must be removed from service, and must never be used.
- Rigging equipment must have load identification information attached to it. Never load rigging equipment in excess of its recommended safe working load.
- All rigging equipment that is not currently being used must be removed from the work area to prevent it from being a hazard to employees.
- Tag lines shall be used at all times unless their usage presents hazards.
- All hooks (e.g., those on overhaul ball assemblies, lower load blocks, or other attachment assemblies) must be able to be closed and locked, without a hook throat opening. Or, you may use an alloy anchor shackle with bolt, nut and retaining pin.
- Employees must stay clear of loads that are about to be lifted, and those that are suspended. Never allow an employee under a suspended load.

Training and Education

“Qualified Offshore Riggers” must successfully complete an approved “API2D Rigger” course. This requires the RAWHIDE LEASING COMPANY, LLC employee to verify that the knowledge they have gained by participating in classroom lectures, hands-on training and then they must pass a written exam. Upon successful completion of the course, the employee will be issued a “Rigger” card. During the training the RAWHIDE LEASING COMPANY, LLC employee must display competency in the following topics:

- Selecting the proper hardware (hooks, wire rope products, eye bolts, shackles, synthetic slings, chain slings, etc) to apply correctly to the load (hitches, angles, weight, temperatures, center of gravity, etc.).
- Inspecting the selected hardware before, during and after the lift.
- Properly securing the load, attaching it to the hook, lifting it, handling it during the movement, and lowering and placing the load.
- Properly storing rigging equipment.
- RAWHIDE LEASING COMPANY, LLC “qualified riggers” must re-certify their training every four (4) years.

RISK ASSESSMENT

Purpose

- To establish procedures for the identification, assessment and management of hazards in the workplace;
- To proactively determine the possible risks of new materials and processes before they are incorporated into the work environment;
- To determine which job duties require risk assessment.

Key Responsibilities

Responsibilities are as set forth in this program.

RAWHIDE LEASING COMPANY, LLC is to evaluate a work site to determine all possible and existing hazards prior to the associated work of said site or prior to the commencement of work at the site.

Hazard and Risk Determination

The processes for hazard identification and assessment of risk are used for all routine and non-routine activities. New processes and changes in current processes, services, or products will also be evaluated using the hazard identification process.

Safety Managers are responsible for administering a baseline hazard assessment of each worksite. This evaluation will identify the tasks to be performed and the potential hazards associated with those tasks. The results should be compiled into a report detailing the hazard assessment and recommendations for managing or eliminating the identified hazards. This report must be signed and dated by the Safety Manager.

The following data should be included in the baseline hazard identification. This list is not all-inclusive:

- Extent of the work,
- Safety, legal and other requirements to be met,
- Prior occurrences and failures in compliance,
- Environmental conditions that may cause harm, including hazardous energy sources and other contaminants,
- Detailed walk through and assessment of the work site.

Identification of hazards shall include, but are not limited to:

- General Preventative Measures
- Work Isolation
- Driving
- Enclosed Spaces
- Heat Exposure
- Energy Isolation
- Bloodborne Pathogens
- Noise Exposure
- Musculoskeletal Disorders
- Other policies and procedures set forth by RAWHIDE LEASING COMPANY, LLC
- Other identified measures specific to a particular site or work scope

RAWHIDE LEASING COMPANY, LLC is responsible for implementing formal procedures for the identification of potential hazards through the use of Job Safety Analysis (JSA), Job Hazard Analysis (JHA), and evaluations specific to particular sites and facilities.

For each hazard identified or risk assessed, controls to manage or eliminate those specific hazards and risks are assigned to the work-site.

Employees and contractors are encouraged to participate in the identification of hazards. RAWHIDE LEASING COMPANY, LLC's program ensures that employees and sub-contractors are actively involved in hazard identification process and the concerns of said employees and contractors are thoroughly addressed.

Employees shall be trained in the identification of hazards, to include usage and care of Personal Protection Equipment (PPE).

Identified hazards are to be reported to the supervisor and addressed by the supervisor immediately. Supervisors shall review the worksite hazard assessment with all employees during orientation at the employee's assigned worksite. The safety manager shall implement methods such as weekly JHA and risk assessment reviews to ensure identified hazards are addressed and mitigated. Documentary evidence of such review shall also be maintained in order to further ensure mitigation of such hazards.

Worksite Hazard Assessment Review

Worksite hazard assessments are to be reviewed annually and repeated as necessary to ensure the worksite maintains safe and healthy working conditions. Specifically, evaluations must be updated when new tasks are assigned that have not been evaluated for risk, when operating processes or procedures change, prior to construction of new work sites or when significant changes are made to an existing worksite.

Supervisors and project managers are responsible for informing the Safety Manager when new hazards are introduced into the work environment. This will require revision of the site's planning and assessment needs.

Risk Assessment

Hazards are classified and ranked based on severity. The program requires that hazards are identified, classified and prioritized based on their associated risk. (For further information regarding severity and probability of risks and hazards, see the risk analysis matrix.)

Risk Management: Ensuring Identified Hazards are Addressed and Moderated

The following describes how identified hazards are addressed and moderated:

- Assessed hazards and their associated risks are addressed and moderated through assignment, documentation of completion, and implementation of controls, which include administrative and engineering controls and the required PPE as set forth in the assessment of specific worksite hazards. Work will not commence prior to the assessment of the worksite. Tasks with a High (Intolerable) risk assessment shall not be performed.
- Upon identification of existing or potential hazards to workers during a hazard assessment, RAWHIDE LEASING COMPANY, LLC shall implement measures to eliminate the hazard whenever possible. If the hazard cannot be eliminated, it will be controlled to the greatest practicable extent. When possible and practicable, engineering controls must be used to eliminate or control hazards. If engineering controls cannot adequately address a hazard, administrative controls will be implemented to control the hazard to the greatest extent possible. If the hazard is uncontrollable by both engineering and/or administrative controls, RAWHIDE LEASING COMPANY, LLC will provide appropriate PPE to be used by workers exposed to the hazard. If an increased level of worker safety may be attained by combining engineering and administrative controls and PPE, RAWHIDE LEASING COMPANY, LLC may use this combination.

Control of Hazards in an Emergency

Only employees trained in the emergency control of hazards may expose themselves to the hazard. The hazard will be controlled by the minimum number of employees required to resolve the emergency situation. For example, in

the event of a gas leak, only those trained in fire safety, gas shut off and other related measures may attempt to contain the hazard.

RAWHIDE LEASING COMPANY, LLC shall contain the hazard to the greatest extent possible while the situation is being remedied.

Hazard Assessment Certification

A worksite hazard assessment shall be completed and signed by the Safety Manager, and will include the site specific Health, Safety and Environment (HSE) plan. Worksite hazard assessments are reviewed annually and shall be updated as new tasks arise that have not been assessed for risk.

Job Safety Analysis (JSA)

Job Safety Analyses shall be performed for the following: jobs with a high rate of risk or illness, new jobs, complex jobs that require written instructions and/or jobs that have been subjected to major changes in policies or procedures. Completed JSAs may be obtained from the Safety Manager.

Site Specific HSE Plan (SSSP)

Each worksite shall have a site specific HSE plan. All employees reporting to a site will receive orientation from their supervisor. This orientation shall include the Site Specific Safety Program (SSSP) for that particular location. SSSPs contain policies on health and safety, site specific safety requirements, a personal protective equipment matrix and a worksite hazard assessment specific to that site and signed by the Safety Manager.

Review Process

Reviews of the hazard assessment program will be conducted to guard against new hazards deriving from corrective measures. This review will involve the safety committee and will include a consideration for management of change.

SUBCONTRACTOR MANAGEMENT PLAN

Purpose

The purpose of this program is to continue to better subcontractor health, safety and environmental achievement and to create a standard for pre-qualification, assessment/selection and improvement of our subcontractors.

Scope

This program applies to all RAWHIDE LEASING COMPANY, LLC subcontractors and locations.

General Requirements

RAWHIDE LEASING COMPANY, LLC manages all subcontractors according to this program.

RAWHIDE LEASING COMPANY, LLC must pre-approve the use of subcontractors. Requirements for this approval include:

- RAWHIDE LEASING COMPANY, LLC safety department performs a formal safety review of the subcontractor.
- The scope of this safety review was appropriate based on the hazards and risk exposure.
- The subcontractor is (or will be) trained in RAWHIDE LEASING COMPANY, LLC's safety policies, expectations and requirements.
- The subcontractor consents that they will follow RAWHIDE LEASING COMPANY, LLC's Drug and Alcohol policy and onsite safety rules through the work term.

RAWHIDE LEASING COMPANY, LLC will not use any subcontractor with a "Non-Approved" safety status any RAWHIDE LEASING COMPANY, LLC site.

Procedure

Pre-Qualification of Subcontractors

RAWHIDE LEASING COMPANY, LLC will review the subcontractor's safety programs, safety training documents and safety statistics to pre-qualify them.

How Acceptable Safety Metrics Will be Used as a Criteria for Selecting Subcontractors

Subcontractors will be pre-qualified using a criteria of safety metrics. The metrics and scoring considers:

- A review of responses to RAWHIDE LEASING COMPANY, LLC Subcontractor Safety Pre-Qualification Form and subcontractor safety program documents - 60% (Rated from 0-60 total points)
- A review of subcontractor safety training documents - 20% (Rated from 0-20 total points)
- A review of subcontractor safety statistics (ie TRIR, EMR, DART, Fatality Rate - 20% (Rated from 0-20 total points)

Evaluation Rating and Acceptance

The rating system of subcontractors has five designations:

- 90 points or greater = A – no restrictions.
- 85 to 89 points = B – A documented mitigation plan must be approved by RAWHIDE LEASING COMPANY, LLC Safety.
- 81 to 84 points = C – A documented mitigation plan must be approved by RAWHIDE LEASING COMPANY, LLC Safety; requires written management approval.
- 71 to 80 points = D – Must have a commitment meeting with subcontractor senior management present; documented mitigation plan must be approved by RAWHIDE LEASING COMPANY, LLC Safety; requires written management approval; regardless of number of workers, trained subcontractor safety personnel must on site during work.
- 70 points or less = F – do not use.

After evaluating and scoring subcontractors, RAWHIDE LEASING COMPANY, LLC safety provides the scores/ranking to management.

If the subcontractor does not progress sufficiently towards an acceptable mitigation plan (or other agreed upon criteria), RAWHIDE LEASING COMPANY, LLC has the right to change their status to “Non-Approved”.

Subcontractor Involvement

While performing work at RAWHIDE LEASING COMPANY, LLC worksites, subcontractors must follow the work practices and systems described below:

- Prior to beginning any work, attend a safety orientation, pre-job or kick-off meeting provided by RAWHIDE LEASING COMPANY, LLC
- Observe employees for signs of substance abuse, reporting nonconformities to RAWHIDE LEASING COMPANY, LLC
- Ensure employees are adequately trained and competent to their work
- Take part in RAWHIDE LEASING COMPANY, LLC tailgate safety meetings, hazard assessments or job safety analysis and work-site safety inspections.
- Conduct a pre-job safety inspection including equipment
- Take part in the Behavior Based Safety hazard reporting system
- Report any spills, injuries, property damage incidents, as well as any near misses
- Follow worksite and Owner Client safety rules
- Utilize applicable RAWHIDE LEASING COMPANY, LLC safety practices and processes
- After the job is complete, clean up and restore the worksite
- Always comply with regulations
- RAWHIDE LEASING COMPANY, LLC will conduct post job safety performance reviews for subcontractors.

SHORT SERVICE EMPLOYEE

Purpose

The purpose of this program is to establish basic requirements for employees who are classified as short service employees (SSE).

Scope

This program applies to all RAWHIDE LEASING COMPANY, LLC employees and workers who are functioning as subcontractors for RAWHIDE LEASING COMPANY, LLC, regardless of their previous experience.

Definitions

(SSE) Short Service Employee – a subcontractor or employee who has less than 6 months of experience in the same job or 6 months of experience with RAWHIDE LEASING COMPANY, LLC.

Mentor – A subcontractor or employee with 6 or more months of experience in the same job or 6 or more months of experience with RAWHIDE LEASING COMPANY, LLC, and who has been assigned to work with short service employees.

Responsibilities

Safety Manager

- Ensure that all affected employees are aware of this program
- Ensure managers and supervisors comply with this program

Managers and Supervisors

- Ensure that all short service employees have a mentor
- Ensure that all short service employees and mentors comply with this program

Applicable Subcontractors

- Adhere to the requirements of this short service employee program

Affected Employees

- Comply with all short service employee requirements
- Comply with all mentor requirements

General Requirements

The following items are the minimum short service employee / mentor requirements, which RAWHIDE LEASING COMPANY, LLC shall meet and enforce at all RAWHIDE LEASING COMPANY, LLC locations:

- New hire safety orientations shall be provided to all employees before initial assignment or re-assignment.
- Short service employees shall not work alone under any circumstances.
- RAWHIDE LEASING COMPANY, LLC shall notify RAWHIDE LEASING COMPANY, LLC clients or host facilities when a short service employee will be working at their site.
- Short service employees shall wear uniquely colored hardhats or another type of identifier such as highly visible sticker or tape on hardhat or work wear.
- All short service employees shall be mentored by a mentor, which is an experienced and knowledgeable employee.

- All short service employees shall be monitored for compliance with HSE policies and procedures.