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# HEALTH, SAFETY AND ENVIRONMENTAL HANDBOOK

*January 2017*

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## HSE Policy Statement

The Health and Safety of our employees are of utmost importance to our Company. United Spectrographics LLC is committed to the administration of a comprehensive program that promotes the health and safety of each of its employees and the environment.

Protecting the well being of employees and the public will always take precedence over the desire for expedience. Safety is a twofold commitment; a partnership wherein both parties share the burden of responsibility and accountability. The success of United Spectrographics LLC's safety program relies not only on management's commitment to provide a safe work environment, but also on the individual commitment of each employee to uphold safe working practices. Good physical health and a serious safety attitude are key contributions that United Spectrographics LLC employees make in order to reduce injuries and promote an environment marked by safety consciousness.

United Spectrographics, LLC is dedicated to protecting the environment as well and our employees are expected to respect and adhere to our clients environmental policies. Our employees do not transport or carry any hazardous chemicals in our work and respect our clients property. Any trash and/or waste is always disposed of properly.

United Spectrographics LLC will continue to do its best to create and provide the necessary programs, information, and environment, which will promote an injury free workplace. Together we can achieve a safe and healthful work environment, which protects the well being of United Spectrographics LLC's employees, customers, and the environment.

Richard Lincourt  
General Manager  
United Spectrographics LLC



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To: Customer Safety Representative

Our company is very small and we have an excellent safety record. We have a policy of **No Contact** with customer equipment as you can see in our policy and procedures manual. We have **Never** had a reportable accident in the history of the company.

Our technician will be working under the **direct supervision** of your electrical maintenance person. At no time will we be working on any of your equipment, our technician is not permitted to touch or manipulate your equipment at any time other than to assist your electrician for safety reasons.

Our company conducts safety training for our new hires during the first weeks of employment. Our technician's work all across the country and attend safety meetings at nearly all of the facilities where we work. They have extensive training at offshore drilling platforms, which is one of the most dangerous places to work in the world and attend daily safety meetings at these locations.

When we are working at your facility, we only have one technician on site and he is the responsible person for the company while he is there working. He works under the direction of your company representatives at all times so that in the event of an emergency, your representatives are able to direct him in the proper course of action.

If you have any questions, I would be glad to answer them for you.

Thank you,

Mark Jackson  
Vice President of Technical Operations  
United Spectrographics LLC  
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Little Rock, Arkansas 72227  
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## **Access to Employee Medical Records**

### **Purpose**

United Spectrographics is committed to the safety and well being of its employees and has implemented the following program to address access to employee medical records in the workplace.

### **Scope**

This program applies to all employees.

### **Procedures**

Employee medical records are records that concern the health status of an employee and are made by a physician, nurse or other health care professional.

Any medical records for employees will be kept by United Spectrographics, LLC for the duration of employment plus 30 years.

Any employee exposure records shall include environmental and/or biological monitoring.

United Spectrographics management will assure that any exposure records will be maintained for the duration of employment plus 30 years.

Employee access to medical records will be provided as soon as possible to the employee upon receipt of a written request. Copies will be provided to the employee at no cost.

United Spectrographics, LLC management removes all personal identification from records prior to giving access. Personal information includes Name, Social Security Number, Address, Payroll information, Drivers License Number, etc.

Employees are notified of this program upon initial assignment and annually thereafter.

United Spectrographics will transfer employee records to successor entity if they cease to do business or if there is no successor, employees will be notified 3 months in advance of closure of their right to access their records.

### **Training**

Employees will be trained on this program initially and annually thereafter or as needed to address changes in policy and procedures.



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## **Bloodborne Pathogen Program**

### **Purpose and Application**

This policy is written to minimize all exposures to blood and other potentially infectious material.

This policy applies to employees who may reasonably anticipate occupational exposure to bloodborne pathogens.

This policy ensures that training and the hepatitis B vaccination series are made available to those individuals who are exposed to bloodborne pathogens (BBP) in the course of their duties.

### **Definition and Scope**

“Blood” means human blood, human blood components, and products made from human blood.

“Bloodborne pathogens” means pathogenic microorganisms that are present in human blood and can cause disease in humans including hepatitis B virus (HBV) hepatitis C virus (HCV) and human immunodeficiency virus (HIV).

“Occupational exposure” means reasonably anticipated skin, eye, mucous membrane, or potential contact with blood or other potentially infectious materials that may result from the performance of an employee’s duties.

### **Roles and Responsibilities**

United Spectrographics LLC management assists in providing information and training on safe work practices, investigates accidents, and recommends preventive/corrective actions.

Management is responsible for ensuring annual training for any of their staff that may reasonably anticipate exposure to bloodborne pathogens in the course of performing their duties.

### **Procedures**

#### **Written Plan**

As our employees work at our many different client facilities, each individual customer location program shall be observed when at that location.

#### **Exposure Control**

Employees limit exposure by safe work practices, personal protective equipment, proper sanitary procedures and avoiding exposure to pathogens. Universal precautions will be observed. Appropriate PPE will be provided at no cost to those employee’s that encounter BBP in the course of their work.

#### **Training**

Training is provided for personnel that are affected by the BBP standard prior to initial assignment and general annual refresher thereafter.

#### **Hepatitis B Vaccination**

The hepatitis B vaccination series is available at no cost to all employees identified to have occupational exposure to bloodborne pathogen. Vaccination procedures must be coordinated through company management.

#### **Bloodborne Pathogen Incidents**

Employees shall wash affected areas immediately with soap and water. If no soap and water is available, antiseptic towels that are provided by the company shall be used and washing with soap and water done as soon as possible. Trained personnel shall do cleaning of contaminated surfaces and equipment.

#### **Record Keeping**

Training records will be kept for at least 3 years and medical records will be kept for the employment duration +30 years of all affected employees.



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# **COLD STRESS PREVENTION PROGRAM**



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## I. Policy

This program provides the minimum safety requirements for protecting United Spectrographics employees from potential injuries and illnesses associated with cold work environments. By following these basic safety principles and maintaining proper safety awareness, employees should be able to avoid serious injury.

## II. Purpose and Scope

The purpose of this program is to provide United Spectrographics employees with the basic information for protecting themselves from cold work environments, which can cause serious injuries and illnesses to occur. Each employee is expected to follow the guideline provided within this section. Supervisors shall be responsible for initiating disciplinary action against employees who do not follow the guidelines within this section.

The information in this program applies to all United Spectrographics employees working in cold environments below 50°F with or without wind chill present.

## III. Definitions

Frostbite – is the freezing or the local effect of a partial freezing of some part of the body. High surface-area-to-volume ratios such as the fingers, toes, ears, nose, and cheeks are most susceptible to frostbite. Improper re-warming (i.e. rubbing and pouring water over) an affected area can cause additional damage or death to the tissue. Have the victim elevated and wrap the affected area with dry sterile bandages and get medical attention. If medical attention is delayed, immerse affected area in **warm, not hot** water, unless there is a chance that the affected area will get cold again.

Hypothermia – is a severe drop in core body temperature due to overexposure to low temperatures. If the condition is not recognized and treated, death can result. Hypothermia often occurs at moderate temperatures (40° F) during periods of heavy precipitation. For cases of mild hypothermia move victim to a warm area, remove wet cloths and replace with dry ones or a blanket and keep them active. For more severe cases do everything listed above for mild cases, but place hot packs on head, neck chest and groin, warming the arms and legs last and get medical attention.

Trench Foot – is caused by having feet exposed to wet cold environments or immersed in cold water for long periods of time. Victims will generally complain of tingling, itching or burning sensations and blisters may form in affected areas. Have the victim elevated, wash with warm water and dry the affected area and get medical attention.



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Wind Chill – a measure of the rate of heat loss from exposed skin caused by the combined effects of high winds and low temperatures. The wind chill temperature is what the temperature "feels like" during cold weather as a result of the wind. As the wind increases, it draws heat from the body, driving down skin temperature and eventually the internal body temperature. Once temperatures drop below 10 °F and the wind is gusting, conditions are ripe for cold-related illnesses.

## **IV. Cold Stress Program**

### A. Work Considerations

1. One aspect of the work environment that must be taken into consideration when planning and conducting projects in winter months (e.g. November through March) is the occurrence of adverse and harsh weather conditions. Cold weather can cause physical discomfort, loss of efficiency, and possibly injury or death. The Site Safety Officer will be responsible for the daily monitoring of temperature and wind speed, which may result in cold stress to United Spectrographics personnel.
  
2. In addition, United Spectrographics personnel should be kept aware of the effects of cold stress. When outdoor temperatures are expected to be below (50° F), near freezing (30° F) or below, United Spectrographics personnel should pace themselves, especially if wearing heavy clothing, and take frequent rest breaks if directly involved with strenuous activities (e.g. lifting, pushing, etc.). Proper intake of non-caffeinated beverages (e.g. water, commercial electrolyte balanced drinks) is encouraged periodically throughout the workday in order to maintain proper fluid level retention and avoiding dehydration.

### B. Signs and Symptoms

1. If an employee experiences one or more of the following:
  - pale, cool moist skin,
  - heavy or no sweating
  - muscle spasms
  - pain in hands, feet, or abdomen
  - strong, rapid, pulse rate
  - dizziness or nausea
  - confusion
  - fainting
  - red, hot, or drier than normal skin

It is strongly advised that they should immediately sit down and attempt to alert a coworker to notify the site supervisor, who will take appropriate measures.



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2. If a worker experiences the following disorders, especially during exhaustive, high physical activity periods outdoors in winter months:
  - uncontrollable shivering
  - vague or slowed speech
  - memory lapses
  - incoherence
  - drowsiness
  - changing color of skin
  - decreasing blood pressure, pulse rate, or respiration

That person may be exhibiting early warning signs of cold stress. It is imperative to get this person acclimatized to a warmer (preferably indoors, at ambient temperatures) location as soon as possible and re-hydrated with non-caffeinated, sweetened beverages.

## C. Safe Work Practices

1. The following practices can help prevent cold stress and related injuries:
  - Ensure workers have suitable clothing for working in cold conditions.
  - Postpone outdoor work if temperatures are less than 40 degrees and there is rain.
  - Conduct outdoor operations during the middle of the day to take advantage of solar heat load.
  - Provide a heated space for workers to take breaks.
  - Ensure worker stay adequately hydrated.
  - Workers and Supervisors should know the signs and symptoms of cold-related illness.
  - Workers should practice the buddy system and monitor other workers on the crew for signs and symptoms of cold-related illness.
  - Supervisors should remind workers of the dangers, and signs and symptoms of cold related illness during daily and weekly safety briefings during periods of low temperatures.
  - Workers should notify the Site Safety Officer if the worker has a medical condition that would pre-dispose him or her to cold stress. These conditions may include heart disease, high blood pressure, pulmonary diseases, obesity, lack of acclimatization, etc.
  - Keep walkways clear of ice and snow, use sand or salt to improve traction.
  - During the winter months, inspect cold weather supplies weekly to ensure that they are in good condition and that you have an adequate supply. Restock as needed.



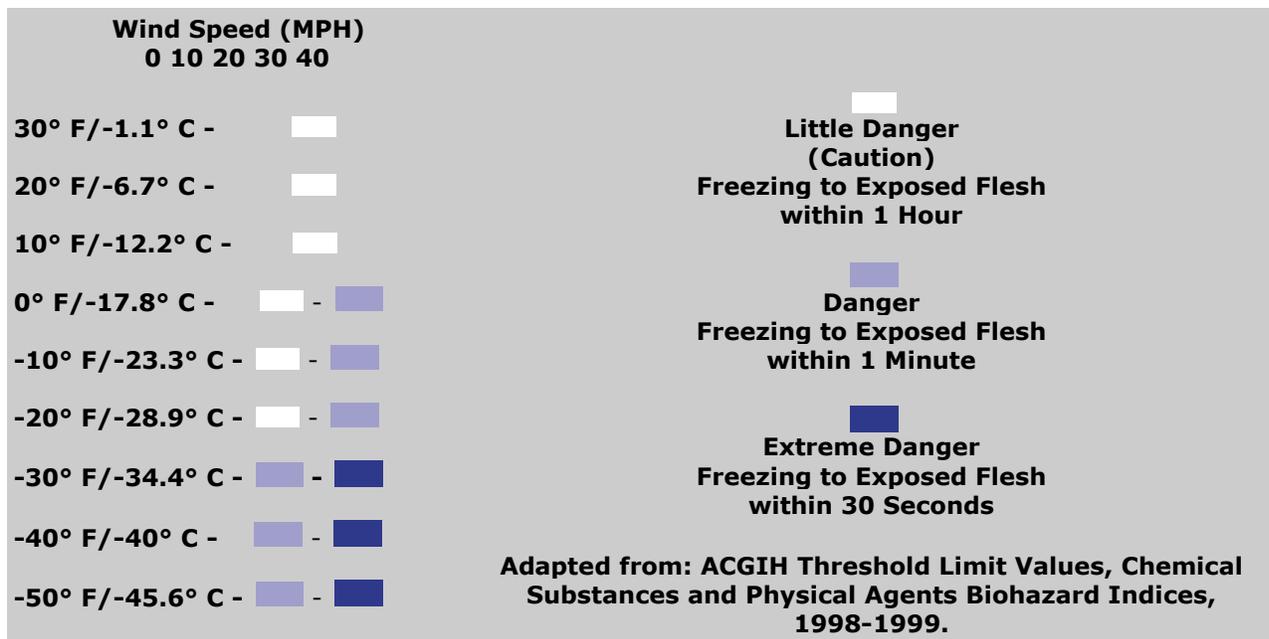
## VII. Training Requirements

All United Spectrographics employees will be trained on the hazards of working in cold environments and working around unstable ice or snow buildup. The training will consist of the information contained within this procedure. Training will be conducted initially and annually or as warranted by an incident or by evidence of the employees lack of understanding or compliance with the program.

### Appendix A

#### The Cold Stress Equation

Low Temperature + Wind Speed + Wetness = Injuries and Illnesses

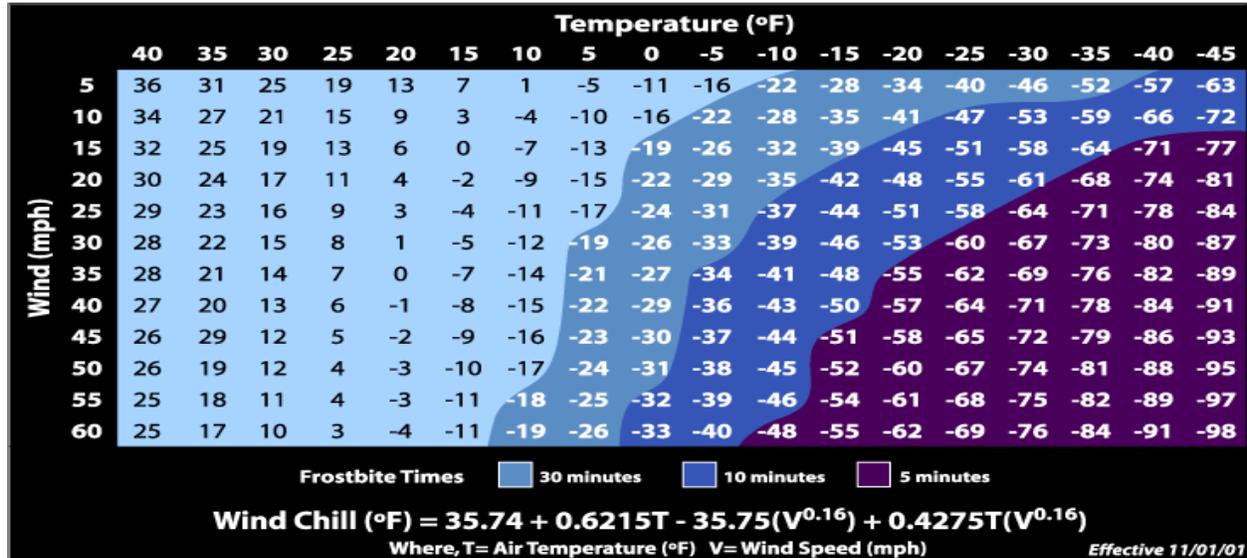




## Appendix B



## Wind Chill Chart





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## Confined Space Entry Program

### Purpose

United Spectrographics is committed to the safety of our employees. We have implemented this Confined Space Entry safety policy to protect our employees.

### Definition of A confined space:

- Has limited or restricted means of entry or exit
- Is large enough for an employee to enter and perform assigned work, **and**
- Is not designed for continuous occupancy by the employee.

These spaces may include, but are not limited to, underground vaults, tanks, storage bins, pits and diked areas, vessels, sewers, and silos.

**A permit-required confined space** is one that **meets the definition of a confined space** and has **one or more** of these characteristics:

1. Contains or has the potential to contain a hazardous atmosphere,
2. Contains a material that has the potential for engulfing the entrant,
3. Has an internal configuration that might cause an entrant to be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross section, and/or
4. Contains any other recognized serious safety or health hazards."

### PROCEDURES

**United Spectrographics LLC employees will not enter permit required confined spaces for any reason.** If an employee is found to have broken this policy disciplinary action will be taken. Employee's are trained prior to initial assignment, annually thereafter or if job assignments change. Training includes recognition of confined spaces and United Spectrographics rules regarding entry.

1<sup>st</sup> Offense: Suspension of 1 to 3 days

2<sup>nd</sup> Offense: Suspension of 5 to 10 days with possible termination

3<sup>rd</sup> Offense: Termination

**United Spectrographics LLC employees will not act as monitors of someone entering a confined space.**

**United Spectrographics LLC employees will not act as rescue personnel for any reason.**

### Training

Training is given to all employee that may encounter confined spaces in their work activities initially and annually thereafter. Training is documented and kept in employee files.



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## **United Spectrographics LLC Disciplinary Program**

United Spectrographics has a progressive discipline policy. The goal of United Spectrographics' progressive discipline system is to give the employee an opportunity to correct employment problems that may arise, rather than to punish employees.

The employee will be kept informed of United Spectrographics' rules and the employee is expected to follow them. The General Manager shall enforce disciplinary actions.

United Spectrographics LLC employees work independently onsite at our client's facilities and perform worksite inspections as part of their daily activities.

### ***Immediate Disciplinary Action***

United Spectrographics believes that engaging in certain types of misconduct should subject an employee to immediate suspension or discharge, rather than allowing opportunity for correction of behavior through progressive discipline steps. These behaviors are covered in our policy manual.

### **Disciplinary Steps**

Should there be a problem regarding the employee's adherence to United Spectrographics' or it's client's rules, the employee will be given an opportunity to change the unwanted behavior:

The employee will be given an explanation of the errant behavior, including a reiteration of what United Spectrographics' rule regarding that behavior is. In addition, the employee will be advised of the consequences of further infractions of the rule in question. If no further problems occur with regard to the issue raised at the verbal warning stage, no further disciplinary action will be taken.

If the problem persists, the employee will be given an explanation of the errant behavior, including a reiteration of what United Spectrographics' rule regarding that behavior is. In addition, the employee will be advised that continuation of the problem will lead to suspension without pay for a stated period of time. As before, the employee will be given an opportunity to change the unwanted behavior and, if the behavior does not recur, no further disciplinary action will be taken.

If verbal and written warnings fail to bring about a change in the undesired conduct, the employee will be suspended and will be informed that further occurrences of the conduct will lead to the employee's immediate discharge, without additional warnings.

**United Spectrographics reserves the right to bypass the disciplinary steps and base its disciplinary action on the severity, frequency or combination of infractions when circumstances warrant immediate action.**



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## **EMERGENCY ACTION PLAN**

### **Purpose**

United Spectrographics is committed to providing a safe workplace for the benefit of our employees. In order to provide a safe work environment, United Spectrographics has implemented an emergency action plan to provide for the safe evacuation of personnel in the event of fire or other emergency.

### **Scope**

The purpose of this policy is to establish procedures by which United Spectrographics will evacuate employees in the event of a fire or other emergency: This policy is applicable to all employees and 3rd party personnel that may be on site during an emergency. The emergency action plan is available for review by employees at any time during normal business hours. Plan details are also communicated orally as we have fewer than 10 employees.

### **Responsibilities**

United Spectrographics general manager is responsible for implementation of the emergency action plan and should be contacted in the event that an employee requires further information about the plan or the employees responsibilities in an emergency situation.

In the event of a fire or other emergency, a verbal notification will be made to all employees at the facility via the public address system by any employee that becomes aware of an emergency. At this time, the general manager or his designee will take charge of the emergency situation.

Contact Richard Lincourt at 501-228-5001 for information.

### **Procedures**

United Spectrographics employees shall be notified of the emergency and given instruction on where to evacuate by PA system. If the PA system is nonfunctional, employees shall follow the procedure below.

United Spectrographics employees shall proceed to the nearest exit that doesn't present a danger to their egress from the building. After the employee has safely exited the facility, they are to report to the manager or his designee at the primary evacuation point which is the parking lot on the south side of the building. If the primary evacuation point is unsafe, they are to report to the secondary evacuation point which is the parking lot on the north side of the building.

The general manager or his designee will account for all employees at the evacuation points by roll call.

The emergency action plan will reviewed with all employees initially and annually thereafter.

United Spectrographics employees when working at our clients facilities will review and follow our clients emergency action plans for contractors and visitors to their facilities



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## FATIGUE MANAGEMENT PROGRAM

### Purpose

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To ensure our employees recognize the effect of fatigue as related to safely being able to perform work and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations.

### Scope

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This program applies to all United Spectrographics projects and operations.

### Policy

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The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:

- Employees must be in a fit state to undertake work
- Employees must be fit to complete work
- Employees must take minimum periods of rest to safely perform their work

These principles will be managed through:

- The appropriate planning of work tasks, including driving, vehicle and equipment maintenance, loading and unloading and other job related duties and processes
- Providing appropriate equipment to help reduce stress and fatigue
- Regular medical checkups and monitoring of health issues as required by legislation
- The provision of appropriate sleeping accommodations where required
- Ongoing training and awareness of employee health and fatigue issues

### Roles and Responsibilities

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The following addresses the roles and responsibilities of workers to report tiredness/fatigue to supervision and that supervision take appropriate action to assist the worker.

United Spectrographics Management

- Management accepts responsibility for the implementation of this fatigue management policy.

Site Manager

- Responsible for the implementation and maintenance of this program for their site and ensuring all assets are made available for compliance with the program.

Roles and Responsibilities Employees in Safety Critical Positions

- Employees must present in a fit state free from alcohol and drugs;
- Employees must not chronically use over-the-counter, prescription drugs and any other product which may affect an employee's ability to perform their work safely, including fatigue that sets in after the effects of the drug wear off.



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- Employees shall report tiredness/fatigue and lack of mental acuity to supervision and supervisory personnel shall make safety critical decisions and take appropriate actions to prevent loss including replacement of tired employees, changing schedules or forcing work stoppages.
- Employees need to be rested prior to starting work.
- Employees need to monitor their own performance and take regular periods of rest to avoid continuing work when tired.

## **Work Hour Limitations and Rest Breaks to Control Fatigue and Increase Mental Fitness**

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United Spectrographics has set the following procedures limiting work hours and controlling job rotation schedules, also known as staff/work balance, to help control worker fatigue. United Spectrographics will set work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and increase mental fitness in an effort to control employee turnover and absenteeism.

1. Every Employee shall have necessary work breaks in order to avoid fatigue. These scheduled breaks will apply to both driving and on site hours. The following shall be a minimum:
  - 15 Minutes each 2.5 hours
  - 30 Minutes after 5 Hours
  - 30 Minutes after 10 Hours
2. No Workers shall work more than:
  - 12 hours per day
  - 24 Days Continuous
3. Unfamiliar or irregular work should be avoided.
4. Chairs will be provided for workers to sit periodically and United Spectrographics will provide periodic rest breaks for personnel.

## **Use of Ergonomic Friendly Equipment**

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Ergonomic equipment will be used to improve workstation conditions such as anti-fatigue mats for standing, lift assist devices for repetitive lifting, proper lighting and controls of temperature and other ergonomic devices as deemed appropriate. Equipment to be used will be determined in the work task analysis.

## **Analysis of Work Tasks to Control Fatigue**

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Work tasks to control fatigue must be analyzed and evaluated periodically. United Spectrographics will make any necessary changes to equipment, training or procedures based on the evaluation.

## **Incident Analysis**

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If there is an incident there shall be an initial identification/assessment of evidence. Initial identification of evidence immediately following the incident might include a listing of people, equipment, materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc. and physical factors such as fatigue, age and medical condition.



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### **Initial and Annual Training for Workers on Fatigue and Controlling Fatigue**

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United Spectrographics is committed to ensuring that all employees are competent to perform their tasks including:

- Fatigue management and health issues.
- United Spectrographics must provide initial and annual training on how to recognize fatigue, how to control fatigue through appropriate work and personal habits and reporting of fatigue to supervision.

A record of individual fatigues training and competency will be maintained.



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## **Incipient Fire Program**

### **Purpose**

United Spectrographics is committed to the safety of its employees in the workplace and has implemented this Incipient Fire Response Program to ensure that our employees are trained and knowledgeable about fire extinguisher use and policies regarding their use.

### **Scope**

This program applies to all employees that travel to and work at our client facilities.

### **Procedures**

Employees are trained on the proper use and handling of portable fire extinguishers and the hazards involved in incipient stage fire fighting.

Employees are trained in recognition of fire hazards and to avoid creating any situations that could potentially present a fire hazard.

Employees are trained that portable fire extinguishers must be visually inspected monthly and have an annual maintenance check to ensure they are in proper working order.

### **Training**

Training on this program is provided to employees initially and annually thereafter.



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## FIRST AID PROGRAM

### PURPOSE

Provide guidance to employees who may need, or who may need to administer First Aid to a coworker

Provide guidance to supervisors in determining what first aid training is required for their employees

Minimize the outcome of employee accidents or exposures

Comply with OSHA and other applicable state and federal regulations

### SCOPE

This document is intended as a master document that addresses regulatory requirements.

This program is applicable to all United Spectrographics LLC employees.

This program is not intended to address workplace injuries so minor that only a band-aid is required, so long as the employee's supervisor is informed of the injury. Examples are paper cuts, minor bruises, etc.

### ELEMENTS OF THE PROGRAM

OSHA defines First Aid as the emergency care provided for injury or sudden illness before emergency medical treatment is available, and a First-Aid Provider as someone who is trained in the delivery of initial medical services, using a limited amount of equipment to perform a primary assessment and intervention while awaiting arrival of emergency medical service personnel.

OSHA requires that each employer ensure the ready availability of medical care and first aid supplies to treat workplace injuries and illnesses. The care available and the supplies available must be commensurate with the hazards of the workplace. For some occupations, including electrical workers and workers using toxic or hazardous chemicals, the requirements are more specific.

The OSHA requirement can be met by the workplace being within minutes of professional medical care, by having medical professionals onsite, or by having employees who are trained in First Aid and CPR by a recognized organization such as the American Red Cross.

In the absence of medical assistance that is reasonably accessible in terms of time and distance to the worksite, a person who has a valid certificate in first aid shall be available to render first aid.

Eyewash and shower stations shall have ready availability for persons that may be exposed to injurious corrosive chemicals.



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## **Reporting Injuries**

All injuries incurred at work should immediately be reported to the worker's supervisor. The supervisor must complete an injury report, and if appropriate to the severity of the injury, arrange for the worker to be transported to a medical care facility. Failure to report the injury by the worker can result in denial of Worker's Compensation benefits.

## **Assessment of the Situation Prior to Giving Care**

Any employee who is in the position of providing first aid to a coworker should first protect himself /herself from injury or illness. This can be achieved by thoroughly assessing the immediate environment and the condition of the victim. If either the environment or the victim pose life-threatening hazards to the First Aid provider, it is appropriate for the First Aid provider to do nothing more than call 911.

## **Giving Care**

First Aid providers should give care commensurate with their training and experience. If training is inadequate for the emergency, the First Aid Provider should call 911 and wait for trained emergency medical services.

## **First Aid Supplies**

OSHA advises that wherever First Aid Kits are kept in the workplace, a specific person is designated as responsible for maintaining the First Aid Kit. This person should also assess the types of injuries and illnesses incurred by the employees of the department, and make certain the first aid supplies are appropriate and adequate for that environment. First Aid supplies shall be stored in a location readily accessible in emergencies. First Aid Kit contents shall be periodically assessed to ensure the availability of adequate first aid supplies.

## **ADMINISTRATION / COMPLIANCE /RESPONSIBILITIES**

United Spectrographics LLC management is responsible for the written Workplace First Aid Program.

United Spectrographics LLC employees are trained in First Aid and CPR, and also on notifying appropriate Department Heads, Managers, or Supervisors. Employees are also responsible for acquiring and maintaining appropriate first aid supplies in their vehicle. These costs will be reimbursed to the employee.



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## REQUIRED TRAINING AND RECORD-KEEPING

The American Red Cross typically provides First Aid training. American Red Cross requires that trainees be retrained in First Aid and certified every three years. For employees who receive CPR-AED training, retraining and certification occur annually.

OSHA has defined certain workers as requiring First Aid and CPR training. These include electrical workers, those involved in hazardous waste operations, and those who work in certain confined spaces. Training records are kept in the United Spectrographics LLC database. Records are also kept by the American Red Cross.

### Specific Procedures

#### Examples of Procedures used by First Aid Personnel

**Note: These procedures are examples. The list is not intended to cover all possible workplace injuries and illnesses. Also, for some injuries there are alternate methods that are recognized by accredited Health Care Associations, and are equally appropriate.**

**Bleeding:** If bleeding is severe, immediately call 911 for assistance. *Note: working with a bleeding victim requires awareness of bloodborne pathogens risks and proper procedures for addressing those risks, including the use of non-permeable gloves.* Cover the wound with a thick, clean pad (such as a gauze pad or pads from the First Aid kit). Apply pressure directly to the covered wound. Add more absorbent pads as needed to stop bleeding, but do not remove soaked pads. Continue to apply pressure until emergency medical care arrives. If bleeding is minor, cover the wound with a thick clean pad, and apply pressure until bleeding stops. Cover the wound and the pad with roller bandages or adhesive, as appropriate to the size and location of the wound.

**Broken Bones, Sprains, and other Musculoskeletal injuries** Call 911. Do not move the victim unless necessary. Keep the victim still, preferably lying down. If it becomes necessary to move the victim, assess the entire body for breaks or other damage. Stabilize damage with a splint, and assist victim in moving to a safer site.

**Burns:** If the burn covers a significant part of the body, affects the face, or is severe, immediately call 911. Immerse the burned area in cool tap water. *Do not use ice!* Continue to treat with running water until emergency medical services arrive. For minor burns, immerse the area in cool tap water until burning stops (often 15 minutes or longer). If no blisters exist, a burn ointment from the first aid kit may be carefully applied. The burn should be covered loosely with gauze or light-weight bandages.

**Choking:** With the conscious victim standing, support the victim with one arm, while hitting the victim in the center of the back with the heel of outstretched hand several times. If this does not work, do abdominal thrusts. Wrap arms around victim at waist level. Make a fist with one hand, and grasp the fist with the other hand. Locate the fist between the victim's navel and the tip of the breast bone, and give sharp, upward thrusts. Repeat until the airway is cleared. Have someone call 911 if this does not happen immediately.



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**Fainting:** Fainting may result from numerous illnesses or medical conditions. If the person faints, it may not be necessary to do anything, unless the fainting condition lasts more than a few minutes. Do not leave the person alone, and call 911 if the fainting does last more than a few minutes.

**Insect Stings and Other Severe Allergic Reactions:** Check to see if victim carries an “epi” pen for injections following allergic reaction. If yes, get the victim to do self injection if possible; if not perform injection on victim. Call 911, as the effects of the “epi” pen may last only a few minutes’.

**Unconscious Victim:** If the victim is unconscious, immediately call for emergency medical services (911) Then, *only if trained*, perform rescue breathing or Cardiopulmonary Resuscitation (CPR) as needed.

**Corrosive Chemicals:** Immediately get the injured person to a shower/eyewash station and flush the affected areas with copious amounts of fresh water. Call 911 and continue to flush affected areas with water until emergency medical personnel arrive.



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## FIT FOR DUTY Program

### **Purpose**

United Spectrographics is committed to providing a safe workplace for the benefit of our employees and clients. In order to provide a safe work environment, United Spectrographics employees must be able to perform their job duties in a safe, secure, productive, and effective manner, and remain able to do so throughout the entire time they are working. Employees who are not fit for duty may present a safety hazard to themselves, to other employees, to customer employees, or to the public.

### **Scope**

The purpose of this policy is to establish procedures by which United Spectrographics will evaluate an employee's fitness for duty when an employee is:

Having observable difficulty performing work duties in a manner that is safe for the employee, for the employee's coworkers, for the customer's employees, or for the public, as determined by the supervisor; or posing a imminent and serious safety threat to self or to others.

### **Definitions**

**Fit for duty** means able to perform the duties of the job in a safe, secure, productive, and effective manner.

**Health service provider** is a doctor of medicine or osteopathy, dentist, podiatrist, clinical psychologist, optometrist, nurse practitioner, nurse-midwife, or a licensed clinical social worker that is authorized to practice in the state person resides or the state in which the customers facility resides.

**Supervisor** means: United Spectrographics management and client management or supervisory personnel.

### **Employee Responsibilities**

Employees are responsible for managing their health in a manner that allows them to safely perform their job responsibilities.

Employees must come to work fit for duty and must perform their job responsibilities in a safe, secure, productive, and effective manner during the entire time they are working.

Employees are responsible for notifying the supervisor if are unfit for duty or when they observe a coworker acting in a manner that indicates the coworker may be unfit for duty. If a supervisor's behavior is the focus of concern, an employee may inform the upper level manager of the situation.



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## **Employer Responsibilities**

Supervisors are responsible for observing the attendance, performance, and behavior of the employees they supervise.

Supervisors/managers are responsible for following this policy's procedures when presented with circumstances or knowledge that indicate that an employee may be unfit for duty.

Confidentiality of medical records.

United Spectrographics will ensure that employees are properly trained and certified in the performance of their tasks prior to the employee working outside of direct supervision of a trainer.

## **Procedures**

Any supervisor who receives reliable information that an employee may be unfit for duty, or through personal observation believes an employee to be unfit for duty, will validate and document the information or observations as soon as is practicable. Actions that may trigger the need to evaluate an employee's fitness for duty include, but are not limited to, problems with dexterity, coordination, concentration, memory, alertness, vision, speech, inappropriate interactions with coworkers or supervisors, inappropriate reactions to criticism, or suicidal or threatening statements.

United Spectrographics management will present the information or observations to the employee at the earliest possible time in order to validate them; and will allow the employee to explain his or her actions, or to correct any mistakes of fact contained in the description of those actions. United Spectrographics management will then determine whether the employee should leave the workplace immediately for safety reasons.

In circumstances where United Spectrographics management are not immediately available, the clients management shall take appropriate action after he or she receives reports and validates or personally observes an employee's unfit behavior. The client supervisor/manager will then make a determination of whether the employee should leave the workplace immediately for safety reasons. United Spectrographics management should then be contacted at the beginning of the next business day so that further action may be taken as required.

United Spectrographics employees are to follow the safe work practices outlined in our safety manual and also any safe work practices deemed necessary at client facilities as long as they do not conflict with United Spectrographics policy and procedure manual.

United Spectrographics employees will be drug screened prior to initial assignment and annually thereafter. Additionally, employees may be screened randomly for behavioral problems, work place accident or if management or client personnel suspect the use or possession of illegal drugs. If an employee is observed using illegal drugs while on the job, the employee will be terminated.

United Spectrographics employees shall notify management personnel of any medications (Prescription or OTC) they are taking that may hinder their ability to safely and effectively perform their duties.

United Spectrographics employees shall notify their immediate supervisor if at any time they feel they are not able to safely continue working. Circumstances may include illness and/or fatigue to the point that the employee is a danger to themselves or others.



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## Hand & Power Tool Program

### **Purpose**

United Spectrographics is committed to the safety and well being of its employees and has implemented this program to ensure that employees are trained and knowledgeable on safety procedures for hand and power tools.

### **Background**

Many workplace accidents, injuries and fatalities are caused by the improper use of hand and power tools. This publication emphasizes the importance of proper safeguards while

using hand and power tools. Common violations cited by the Occupational Safety and Health Administration (OSHA) are improperly adjusted guards on grinders; grinding wheels not rated for the speed of the grinder; no protection from rotating parts; no training for explosive-actuated tools; and mortar mixers not properly guarded. Rules for hand and power tool use in general industry are found in 29 Code of Federal Regulations 1910 Subpart P, 'Hand and Portable Power Tools and Other Hand-Held Equipment'. Rules for the construction trades are in 29 CFR 1926 Subpart I, 'Tools – Hand and Power'.

### **Requirements**

#### **Condition**

Employers are responsible for the safe condition of all tools in the workplace, including those furnished by their employees. Employers should ensure that maintenance is performed on a regular basis and according to manufacturer's specification. A written preventative maintenance schedule is an example of best business practice.

If any hand or power tool is found to be unsafe or defective the tool shall be identified as being unsafe by tagging and/or locking the controls to render them inoperable and be physically removed from its place of operation.

#### **Hand Tools**

Use the right tool for the job. Wrenches are not hammers; knives are not screwdrivers. Wrenches shall not be used when jaws are sprung to the point that slippage occurs. Impact tools shall be kept free of mushroomed heads. Wooden handles on tools shall be kept free of splinters and cracks and shall not be used if they have become loose.

#### **Portable Power Tools**

##### **Electric Tools**

All electric tools must be double insulated or grounded with a grounding prong. If the prong is missing, do not use the tool. Electric cords must never be used for hoisting or lowering tools. Replace cords that have damaged insulation. Don't tape over the damage.



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### **Pneumatic Tools**

All pneumatic tools must be secured to the air supply hose or whip to prevent disconnecting. Never carry tools by the hose. Clips or retainers must secure all attachments used on these tools to prevent them from being expelled from the tool. A muzzle safety must be provided on pneumatic nailers or staplers when they operate at or above 100 pounds per square inch (PSI) to prevent the tool from activating unless it is in contact with the work surface. Never use compressed air above 30 PSI for cleaning purposes and then only with effective chip guarding and personal protective equipment.

### **Fuel-powered Tools**

Proper fueling procedures, including equipment shutdown, must be followed when using fuel-powered tools. Adequate ventilation and personal protective equipment must be used to protect employees from toxic fumes given off by this type of equipment.

### **Hydraulic Tools**

All fluids used in hydraulic tools must be fire resistant. All manufacturer's operating procedures must be followed. **Explosive-actuated Fastening Tools**

All operators must be trained in the use of these tools. Conduct daily tests to verify that all safety devices are working. Operators must always use the correct shield or guard for the tool and wear the proper protective equipment. Defective tools must be removed from service immediately. Tools must never be loaded until just before use.

Never point one at a person. Never leave a loaded tool unattended. Never use one in an explosive or flammable environment. These tools must never be used on very hard or brittle materials such as cast iron. When working with soft materials, use a backing to avoid over-penetration.

### **Abrasive Wheel Tools**

When you are using abrasive wheel tools make sure all proper guards are in place and correctly adjusted. Adjust tool work rests so that the maximum clearance between the rest and the wheel does not exceed 1/8 inch. Wear sufficient eye protection for the job. Make sure the wheel is rated for the speed of the motor. Inspect wheels for defects using the 'ring test.' Hold the wheel with one finger through the center hole and strike it with a wooden or hard plastic screwdriver handle at a point 45 degrees from the vertical centerline and between 1 or 2 inches from the outer rim. A wheel in good condition will give a clear, metallic ring; a wheel which is damaged will not.

### **Switches**

The following hand-held tools may be equipped with only a positive on-off switch: platen sanders, disc sanders and grinders with wheels that are two inches or less in diameter, routers, planers, laminate trimmers and shears. Also included are scroll, saber or jig saws with blade shanks that are 1/4 inch wide or less. All other tools must be equipped with a spring-loaded switch that turns off when finger pressure is released.



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## **Bench and Floor-Mounted Power Tools**

### **Guarding**

All exposed belts, chains, gears, drums, flywheels and any other reciprocating or moving parts must be guarded. Machine guards such as barrier guards, proximity sensors or two-handed tripping devices must be in place when any machine is in use. Guards must also be provided to protect employees from flying chips, sparks, abrasives, splashing, etc. Ventilation fans must be guarded unless they are at least seven feet above the floor. Fan guards must have maximum openings no larger than 1/2 inch. The point of operation, where work is actually performed or material is processed, shall be guarded if it exposes an employee to injury. Some examples of machines requiring this type of guarding are shears, alligator cutters, power presses, milling machines, forming rollers and calenders. All machines at a fixed location must be securely anchored to prevent walking or moving by contact.

## **Woodworking Tools**

### **Disconnect Switches**

All woodworking tools must have a disconnect switch that can either be locked or tagged out in the OFF position.

### **Speeds**

All circular saws over 20 inches in diameter or operating at over 10,000 peripheral feet per minute must be etched or otherwise permanently marked with the correct operating speed.

### **Guarding**

All circular saws must be guarded above and below the base plate and the shoe. These guards must immediately return to the covering position at the end of the cut. Radial saws must have the upper portion of the blade, including the saw arbor, completely enclosed by a hood. The full diameter of the lower exposed portion of the blade must be guarded. The guarding device must automatically adjust itself to the thickness of the stock and remain in contact with the stock during the cut. The portion of a circular, hand-fed rip saw above the material being cut must be completely enclosed by a hood.

## **Personal Protective Equipment**

Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases shall be provided with particular PPE necessary to protect them from the hazard.

### **Training**

Training on this program is given initially before assignment and annually thereafter or as changes occur that require training on new procedures or equipment.



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## Hearing Conservation Program

### Purpose

United Spectrographics hearing conservation program is designed to protect workers with significant occupational noise exposures from suffering material hearing impairment by using PPE (Personal Protective Equipment Ear Plugs, Ear Muffs, etc).

### Scope

This program applies to all employees that may encounter occupational noise exposure exceeding the levels noted in OSHA 1910.95.

### Procedures

United Spectrographics LLC employees work in different locations every day, usually with low levels of noise, however, there are times employees may be in areas that require them to wear PPE with a noise reduction rating of at least 29db. These are areas designated as high noise by our clients after monitoring and require hearing protection while in the area.

Because they may be exposed to different noise level at anytime while on the job, all field technicians shall wear appropriate hearing protection devices at all times when working at a client location where any high noise environment is present, even when they are not working in that environment. Employees will inquire about high noise areas prior to beginning work. These devices are provided at no cost to employees.

There are several styles and types of hearing protectors that provide very good protection for noise exposure. See specific instructions for use on the package of each particular style of hearing protection device for the proper use and care of the device. If one style of protection is not working well for you, request a different style.

Audiometric testing is available at no cost to all employees deemed to be exposed to high noise areas. Exposed employees will be given a baseline audiogram and will have annual tests to check for changes.

Never wear dirty ear plugs as this can lead to possible ear infections or other related medical problems. Replace dirty or worn ear plugs as needed.

### Training

United Spectrographics LLC provides employees with initial training and annual training thereafter our hearing conservation program. The program will be updated to be consistent with current PPE and standard work processes. A copy of this program is included in the employee handbook.



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## Heat Illness Prevention Program

### Purpose

United Spectrographics LLC is committed to the safety and well being of our employees and therefore has implemented this Heat Illness prevention plan to educate and train employees to be aware of the dangers of heat related illnesses, how to recognize initial signs of heat related illnesses, steps to prevent heat related illnesses and what to do if symptoms occur.

### Scope

This policy applies to all employees of United Spectrographics.

### Definitions

**Acclimatization:** The temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for about two hours per day in the heat.

**Environmental risk factors for heat illness:** The working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personnel protective equipment worn by employees.

**Heat illness:** A serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope, and heat stroke.

**Personal risk factors for heat illness:** Factors such as an individual's age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention or other physiological responses to heat.

**Preventative recovery period:** A period of time to recover from the heat in order to prevent heat illness.

**Shade:** The blockage of direct sunlight. Canopies, umbrellas, and other temporary structures or devices may be used to provide shade. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning.



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## Training

Provide training to all potentially impacted employees and their supervisors on the risks and prevention of heat illness, including how to recognize symptoms and respond when they appear. Training will be provided initially before assignment and annually as a refresher prior to the start of the summer season.

Supervisors will be trained in preventing heat related illnesses prior to supervising employees

Supervisors will be trained in the employer's heat illness emergency response procedures.

### **Employees** - All employees working on job tasks where environmental risk factors

for heat illness are present shall receive instruction before being assigned to work tasks.

Training topics shall include the following:

Environmental and personal risk factors for heat illness.

Procedures for identifying, evaluating, and controlling exposures to the environmental and personal risk factors for heat illness.

Employees who experience excessive sweating require frequent consumption of small quantities of water, up to 4 cups per hour when working in extreme conditions of heat.

Importance of acclimatization.

Different types, signs, and symptoms of heat illness.

Importance of immediately reporting symptoms or signs of heat illness in themselves or in coworkers to their supervisor.

Procedures for responding to symptoms of possible heat illness, including how emergency medical services will be contacted and provided, should they become necessary.

## Responsibilities

**Management:** Assure adequate water and shade are available to employees that are working in areas where heat illnesses could occur.

Ensure that all employees have received proper training on heat illness recognition and prevention.

Ensure that program requirements are being followed by all employees.

Supervisors must consider personal factors into account when assigning employees to tasks where heat related illness could occur.

**Employees:** Comply with provisions of the Heat Illness Prevention Plan as described in this document and in training sessions attended.

Ensure they have adequate drinking water available at all times, especially when environmental risk conditions for heat illness are present.

Ensure they have access to shaded areas to prevent and recover from heat related symptoms.

Report any heat related illness symptoms to management and be observant for heat related illness in co-workers and report to management.



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### **Physical Factors That Can Contribute to Heat Related Illness**

Some physical factors that can contribute to heat related illness are type of work, level of physical activity and duration, and clothing color, weight and breathability . These factors must be taken into account when assigning work activities.

### **Procedures**

Employees must have access to potable drinking water and encouraged to frequently consume small amounts of water throughout the day – up to 4 cups per hour depending heat conditions. If plumbed potable water is not readily accessible, provide portable water containers or bottled water.

Employees suffering from heat related illnesses or in need of a recovery period from the heat must be provided with access to an area with shade that is either open to the air or provided with ventilation or cooling for a period of no less than five minutes. Access to shade must be permitted at all times. Other methods of cooling, other than shade, can be used if it can be demonstrated that these methods are at least as effective as shade.

## **HEAT STRESS FACT SHEET**

High temperatures and humidity stress the body's ability to cool itself, and heat illness becomes a special concern during hot weather. There are three major forms of heat illnesses: **heat cramps**, **heat exhaustion**, and **heat stroke**, with heat stroke being a life threatening condition.

### **Heat Cramps**

Heat cramps are muscle spasms which usually affect the arms, legs, or stomach. Frequently they don't occur until sometime later after work, at night, or when relaxing. Heat cramps are caused by heavy sweating, especially when water is replaced by drinking, but not salt or potassium. Although heat cramps can be quite painful, they usually don't result in permanent damage. To prevent them, drink electrolyte solutions such as Gatorade during the day and try eating more fruits like bananas.

### **Heat Exhaustion**

Heat exhaustion is more serious than heat cramps. It occurs when the body's internal air-conditioning system is overworked, but hasn't completely shut down. In heat exhaustion, the surface blood vessels and capillaries, which originally enlarged to cool the blood, collapse from loss of body fluids and necessary minerals. This happens when you don't drink enough fluids to replace what you're sweating away.

The symptoms of heat exhaustion include: headache, heavy sweating, intense thirst, dizziness, fatigue, loss of coordination, nausea, impaired judgment, loss of appetite, hyperventilation, tingling in hands or feet, anxiety, cool moist skin, weak and rapid pulse (120-200), and low to normal blood pressure.



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Somebody suffering these symptoms should be moved to a cool location such as a shaded area or air-conditioned building. Have them lie down with their feet slightly elevated. Loosen their clothing, apply cool, wet cloths or fan them. Have them drink water or electrolyte drinks. Try to cool them down, and have them checked by medical personnel. Victims of heat exhaustion should avoid strenuous activity for at least a day, and they should continue to drink water to replace lost body fluids.

### **Heat Stroke**

Heat stroke is a life threatening illness with a high death rate. It occurs when the body has depleted its supply of water and salt, and the victim's body temperature rises to deadly levels. A heat stroke victim may first suffer heat cramps and/or the heat exhaustion before progressing into the heat stroke stage, but this is not always the case. It should be noted that, on the job, heat stroke is sometimes mistaken for heart attack. It is therefore very important to be able to recognize the signs and symptoms of heat stroke - and to check for them anytime an employee collapses while working in a hot environment.

The early symptoms of heat stroke include a high body temperature (103 degrees F); a distinct absence of sweating (usually); hot red or flushed dry skin; rapid pulse; difficulty breathing; constricted pupils; any/all the signs or symptoms of heat exhaustion such as dizziness, headache, nausea, vomiting, or confusion, but more severe; bizarre behavior; and high blood pressure. Advance symptoms may be seizure or convulsions, collapse, loss of consciousness, and a body temperature of over 108 degrees F.

It is vital to lower a heat stroke victim's body temperature. Seconds count. Pour water on them, fan them, or apply cold packs. Call University Police and get an ambulance on the way as soon as possible.

### **Take these precautions to prevent heat-related illnesses:**

- Condition yourself for working in hot environments. Start slowly then build up to more physical work. Allow your body to adjust over a few days.
- Drink lots of liquids. Don't wait until you're thirsty! By then, there's a good chance that you're already on your way to being dehydrated. Electrolyte drinks are good for replacing both water and minerals lost through sweating. Never drink alcohol, and avoid caffeinated beverages like coffee and soft drinks.
- Take frequent breaks, especially if you notice you're getting a headache or you start feeling overheated. Cool off for a few minutes before going back to work.
- Wear lightweight, light colored clothing when working out in the sun.
- Take advantage of fans and air-conditioners.
- With a little caution and a lot of common sense, you can avoid heat related illnesses.



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## **Incident Investigation and Reporting Program**

### **Purpose**

United Spectrographics is committed to the safety of its employees and has implemented the following program to address incidents in the workplace.

### **Scope**

This program applies to all employees.

### **Considerations**

The fact that our work is normally always an individual employee at our client facilities, it makes accident investigation difficult. However, in the event of an incident with one of our employees, United Spectrographics will send a member of our management team to the location to investigate the incident.

### **Procedures**

Employees will immediately report all incidents on our clients property to the management personnel at the facility where they are working.

United Spectrographics will investigate along with our client HSE and management personnel any accidents or incidences that occur on their property that involve our employees. All incidents will be investigated properly to a level required by the seriousness of the incident.

United Spectrographics investigating manager will report incident to OSHA and all other appropriate regulatory agencies within 8hrs as incident requires.

United Spectrographics management will lead the investigation along with our client HSE manager and safety committee members.

United Spectrographics investigating manager will assure that any equipment required for the investigation will be available for use during the investigation.

United Spectrographics investigating manager will document with notes and photo's initial identification and assessment evidence as soon as possible after reporting of an incident.

United Spectrographics investigating manager will collect all evidence pertaining to the incident, which may include but is not limited to photo's, drawings, witness interviews, statements and notes accumulated during the investigation and store the evidence in a secure location.

United Spectrographics will ensure that witness interviews are conducted in appropriate locations using trained interviewers if needed to ensure that all testimony is accurate and non biased. Follow-up interviews will also be conducted as needed.

United Spectrographics management along with the incident investigation team will make recommendations for corrective action concerning the root cause of the incident after the investigation is complete.



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A written incident report will be prepared by United Spectrographics management and provided to the client HSE manager. The report will contain incident details, recommended actions and corrective actions taken and will be filed at United Spectrographics office.

United Spectrographics management will analyze all data and recommendations that come from the incident investigation and make appropriate changes to policy as required to prevent similar occurrences in the future.

### **Training**

Employees will be trained on their responsibilities in an incident and in the investigation that will follow.

Employees will be trained on this program initially before first assignment and annually thereafter or as needed to address changes in policy and procedures.



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## **Injury/Illness Record Keeping Program**

### **Purpose**

United Spectrographics is committed to the safety of its employees and has implemented the following program to address accident and injury recordkeeping in the workplace.

### **Scope**

This program applies to all employees.

### **Considerations**

The fact that our work is normally always an individual employee at our client facilities, it makes accident investigation difficult. However, in the event of an incident with one of our employees, United Spectrographics will send a member of our management team to the location to investigate the incident and gather records.

### **Procedures**

A written record of all work related injury, illnesses and fatalities will be kept in the office for review.

United Spectrographics management will ensure that all injuries or illnesses will be recorded on the OSHA 300 log within 7 calendar days of notification of the injury or illness.

The OSHA 300A summary will be signed by a United Spectrographics official.

The OSHA 300A summary will be posted in a place visible to all employees from February 1st through April 30th each year.

United Spectrographics management will assure that all records will be maintained for 5 years.

### **Training**

Employees will be trained on this program initially and annually thereafter or as needed to address changes in policy and procedures.



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## Lock Out Tag Out Program

### Purpose

United Spectrographics is committed to the safety of our employees and has implemented this LOTO program to protect not only our employees, but also the electricians and other customer representatives the we work with during our daily activities.

### Scope

This program applies to all United Spectrographics employees.

### Procedures

United Spectrographics employees are not authorized to touch our clients electrical or mechanical equipment for any reason.

This policy prevents us from participating in any LOTO process in any form other than an observer.

### Employee Responsibilities

Do not allow the customer representative to open electrical panels behind you so that if you were to trip while taking a step back while scanning, you would not fall into the open electrical equipment.

Technicians shall observe the customer representative to ensure that no action taken by him presents a danger to himself or to the technician or the customers equipment.

Technicians shall under no circumstances place their hands inside a customer's electrical cabinet for any reason. If an area is not visible from the angle provided, then remove another cover to view the area or seek some other means to view the area.

Always assume that electrical equipment is energized. Equipment that is not running still may have live electrical circuits and therefore can cause serious injury or death if contact is made with the components.

Our technician's are not authorized to participate in lockout of any customer equipment, as this would violate our policy regarding operation of customer equipment.

Our technician works under direct supervision of our client's personnel and are not authorized to manipulate or operate customer equipment at any time.

### Training

Training on this program is given initially and annually thereafter or as the need arises.



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## MANUAL MATERIAL HANDLING PROGRAM

### Purpose

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The purpose of the United Spectrographics, LLC Manual Material Handling Program is to apply ergonomic principles and sound decision-making to the workplace in an effort to reduce the number of manual lifts thus decreasing workplace injuries and, where possible, increasing productivity, quality and efficiency. A proactive material handling approach focuses on making changes when risk factors have been identified, as well as incorporating automated material handling into the design phase of new facilities, equipment, tools and scheduling changes.

All employees are required to follow the minimum procedures outlined in this program. Any deviations from this program must be immediately brought to the attention of the Program Administrator.

### Scope

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United Spectrographics, LLC strives to provide all employees with a safe and healthy workplace. This Manual Material Handling Program is integrated into our company's written safety and health program, and is a collaborative effort that includes all employees. The Program Administrator is responsible for the program's implementation, management and recordkeeping requirements.

### Program Responsibilities

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**Management:** The management of United Spectrographics, LLC is committed to the safe handling of all materials. Management supports the efforts of the Manual Material Handling Program Administrator by pledging financial and leadership support for the identification and control of material handling risk factors.

**Material Handling Program Administrator:** The Program Administrator will report directly to upper management and be responsible for this program. All evaluations, controls and training will be coordinated under the direction of the Program Administrator in collaboration with management. The Program Administrator will monitor the results of the program and determine additional areas of focus as needed. The Program Administrator will also:

- Ensure that those performing worksite evaluations and training are properly trained
- Ensure that control measures are implemented in a timely manner
- Schedule manager, supervisor and employee training and maintain records to include date, name of instructor, topic and materials used
- Follow-up with any material handling strategy and/or solutions
- Monitor the program on a quarterly basis and provide an annual review
- Assist in selection of appropriate material handling equipment and tools

**Managers:** Managers and supervisors of United Spectrographics will:

- Remain accountable for the health and safety of all employees within their departments through the active support of this program
- Attend material handling training on the recognition and control of work-related material handling risk factors; this is a supplemental component to our Ergonomics program
- Ensure that employees in their areas have received the appropriate training
- Ensure that safe material handling practices and principles are considered daily and when conducting worksite evaluations
- Ensure that recommended controls are implemented and/or used appropriately through active follow-up



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- Provide employees with and ensure the proper use of appropriate tools, equipment, parts and materials
- Maintain clear communication with managers and employees
- Make assistance available to employees who manually handle or lift items weighing 50 pounds or greater

**Employees:** Every employee of United Spectrographics, LLC is responsible for conducting himself/herself in accordance with this policy and program. All employees will:

- Use two-wheeled trucks, four-wheeled carts, roller conveyors, pallet jacks, or any other material handling equipment in the manner established by managers and supervisors
- Ensure that equipment is properly maintained in good condition and when not, report it immediately
- Provide feedback to managers and supervisors regarding the effectiveness of design changes, new tools or equipment
- Attend training as required and apply the knowledge and skills acquired during training to their jobs, tasks, processes, and work activities
- Use proper lifting and material handling techniques as outlined in this policy
- Limit manual lifting or handling tasks to objects less than 50 pounds
- Get assistance whenever manually handling or lifting materials that are 50 pounds or greater
- Report injuries within 24 hours of their occurrence

*Employee involvement is an essential element to the success of this program. Employees will provide input and assistance with worksite evaluations, identifying risk factors, development and implementation of controls, and training. Employee participation in the program will occur only during company time. Employees that identify lifting hazards or other safety hazards will immediately notify their supervisor. If a supervisor is not available, they are to contact the Program Administrator.*

## Manual Material Handling Risks

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**Material Handling Equipment.** Additional tools and equipment are required when lifting or handling material weighing over 50 pounds. Manual material handling equipment should be used only for its designed task and maintained in good condition. This equipment will be provided to employees.

**Housekeeping.** Material handling and storage areas must be kept free of excess materials that create hazards (i.e. fire, explosions, slips, trips, or infestation by insects or rodents.)

**Aisles and Passageways.** Where mechanical handling equipment is used, 10-foot safe clearances shall be allowed for aisles, at loading docks, through doorways, and wherever turns or passage must be made. Aisles and passageways shall be kept clear and in good repair, with no obstruction across or in aisles that could create a hazard.

Permanent aisles and passageways are marked with yellow lines. Clearance signs and warning of clearance limits are posted throughout the facility where headroom is below 10 feet. All equipment is marked indicating the working load it will safely support. Do not overload any piece of equipment.



## Procedures

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- A hazard assessment must be completed prior to any material handling task to assess the size, weight, if more people are needed or if material handling equipment must be used. Also, assess the area for any trip hazards, grade changes and the path to be taken.
- Use proper lifting techniques to avoid injury.
- Any injuries due to improper lifting techniques will be investigated and documented and the findings will be used to update work procedures to avoid future lifting injuries.
- If using lifting equipment is not possible or practical or if it would cause an unsafe condition. You must use the two man lift procedure.
- Management will periodically evaluate employee work stations and techniques to assess the potential for injuries or need for changes in procedures to prevent injuries.
- Manual lifting equipment and engineering controls will be provided to employees as required for their assigned tasks.
- Employees must be trained and certified on the use of manual lifting equipment prior to using that equipment. Untrained employees shall not use any type of manual lifting equipment without proper training.

## Employee Training

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Training is intended to enhance the ability of managers, supervisors and employees to recognize work-related material handling risk factors and to understand and apply appropriate control strategies. Training in the recognition and control of these risk factors will be given as follows:

- To all new employees during orientation
- To all employees assuming a new job assignment requiring manual material handling
- When new jobs, tasks, tools, equipment, machinery, workstations or processes are introduced
- When high exposure risk factors have been identified

The minimum training requirements for all managers, supervisors and employees will include the following elements:

- An explanation of United Spectrographics, LLC material handling program and their role in the program
- Knowledge of job tasks that require manual material handling
- An understanding of the basics of ergonomics
- The methods used by United Spectrographics, LLC to minimize work-related risk factors

Training should include the following topics:

Mechanical aids for carrying or moving loads are to be used whenever possible to minimize manual material handling. These mechanical aids include hand trucks, carts, dollies, rolling conveyors, wheelbarrows, etc. When designing or modifying storage areas, store heavy items on shelves between knee and shoulder level and avoid storing items on the floor. Also, lighter items should be stored on top shelves. Whenever possible, decrease the object container size, change container shape and/or add handles to aid in handling.



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Even when mechanical aids are used to move materials, some lifting cannot be avoided. Before you lift, remember the following:

- Use manual material handling devices (hand dollies, carts, lift tables, forklifts) where defined by the company and wherever possible in all other situations
- Wear supportive shoes
- When possible, push and pull rather than lift and lower
- Reduce the size of the material to keep it light, compact and easy to grasp
- Try to have most workplace deliveries placed at hip height
- Always keep objects in the comfort zone (between hip and shoulder height)
- Keep all loads close to and in front of the body
- Keep the back aligned while lifting
- Keep elbows near 90 degrees
- Avoid slopes
- Avoid uneven floors
- Maintain the center of balance
- Let the legs do the actual lifting
- Decide on the route to take
- Check the route for any problems or obstacles such as slippery or cluttered floors

Unloading objects should be done the same way as loading objects, but in the reverse order as follows:

- Slowly bend your knees to lower the load
- Keep your back straight and the weight close to the center of your body
- Allow enough room for fingers and toes when the load is set down
- Place the load on a bench or table by resting it on the edge and pushing it forward with your arms and body
- Secure the load to ensure that it will not fall, tip over, roll or block someone's way

One-arm loads are used when carrying items such as pails or buckets. Lifting and carrying one-arm loads should be performed as follows:

- Bend at the knees and waist, keeping your back straight
- Reach for the load
- Grasp the handle of the load firmly
- Lift with your legs, not your shoulders and upper back
- Keep your shoulders level while switching hands regularly to reduce overexerting one side of the body

Team lifts are used when objects are too heavy, too large or too awkward for one person to lift. Team lifts should be performed as follows:

- Work with someone of similar build and height, if possible
- Choose one person to direct the lift (e.g., "lift on the count of three")
- Lift with your legs and raise the load to the desired level at the same time
- Always keep the load at the same level while carrying
- Move smoothly and in unison
- Set the load down together



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Overhead loads should be eliminated if possible, but if necessary, should be conducted as follows:

- When lifting or lowering objects from above the shoulders, lighten the load whenever possible
- Stand on something sturdy such as a step stool or platform to decrease the vertical distance
- When lowering objects from above the shoulders, grasp the object firmly, bring the load as close to your body as possible, slide it down slowly and proceed with your move



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## **MARINE TRANSPORTATION PROGRAM**

### **Purpose**

United Spectrographics is committed to the safety of our employees when traveling offshore on marine vessels. United Spectrographics has implemented this Marine Transportation safety plan to provide for the safe transport of personnel in a marine environment.

### **Scope**

The purpose of this policy is to establish procedures by which United Spectrographics will board and disembark vessels and employee behavior and responsibilities while onboard any marine vessel. This plan applies to all employees being transported on marine vessels. Plan details are also communicated orally as we have fewer than 10 employees.

### **Responsibilities**

United Spectrographics general manager is responsible for implementation of the marine transportation program and should be contacted in the event that an employee requires further information about the plan or the employees responsibilities. Employee's are responsible for abiding by the rules laid out in the program and their behavior while onboard any marine vessel. Failure to abide by the program rules is grounds for disciplinary action.

### **Procedures**

Only properly licensed vessel captains may navigate vessels. United Spectrographics employees shall follow the directions of the crew and captain while onboard a marine vessel. The vessel captain has full authority during all phases of marine transportation.

United Spectrographics employees shall adhere to personal flotation device rules when boarding and disembarking any marine vessel.

United Spectrographics employees shall not throw trash or any other debris from any vessel on which they are being transported. This is covered in the Marine Trash and Debris video as part of employee training. If anything is lost overboard while on a marine vessel, a best possible effort must be made to retrieve the item without endangering people.

United Spectrographics employees shall not transport hazardous chemicals on a marine vessel at any time. Failure to comply with this program will be grounds for disciplinary action.

### **Protection of Fishing Devices**

Materials, equipment, tools, containers, and other items used in the OCS that are of such shape or configuration that they are likely to snag or damage fishing devices shall be handled and marked as follows:

- (1) all loose materials, small tools, and other small objects shall be kept in a suitable storage area or a marked container when not in use,
- (2) all cable, chain, or wire segments shall be recovered after use and securely stored until suitable disposal is accomplished,



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(3) skid-mounted equipment, portable containers, spools, reels, and drums shall be marked with the owner's name before use or transport over offshore waters,

(4) all markings must clearly identify the owner and must be durable enough to resist the effects of the environmental conditions to which they may be exposed, and

(5) MMS PINC G-252 stipulates that the above markings cannot be made with chalk, grease pencil or crayon, marking pens, non-waterproof decals, or water based paints.

### **Training**

Training on this program is done initially and annually or as needed to address changes in requirements.



## **NON DOT DRUG AND ALCOHOL PROGRAM**

### **Scope**

This policy applies to all United Spectrographics employees.

### **Purpose**

United Spectrographics is committed to the safety of our employees and the safety of others and has implemented this policy to ensure that safety.

### **Procedures**

All technicians will be required to take a pre-employment drug and alcohol screening on their first day of employment and continued employment is contingent upon passing the initial test. All drug screening is conducted through DISA out of Houston, Texas.

Thereafter, drug screens will be done on a random selection basis as required by DISA and/or done annually if an employee is not selected at random.

Employee will be subject to drug and/or alcohol testing if company management or client personnel have reasonable cause to believe the employee is under the influence of drugs or alcohol while on the job.

Testing will be done in cases of accident or injury to you, or to someone else as a result of an action by you. Testing positive for an illegal drug or a controlled substance without a prescription will be grounds for termination and you will not be allowed to work at that facility again.

The use of drugs and alcohol while on the job is strictly forbidden and may result in termination. Arriving at a job site under the influence of drugs or alcohol will also be grounds for termination as will a DUI citation while traveling to or from work sites.



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## HELICOPTER SAFETY PROGRAM

### **Purpose**

United Spectrographics is committed to the safety of our employees when traveling offshore by helicopter to marine vessels. United Spectrographics has implemented this helicopter safety plan to provide for the safe transport of personnel on helicopters.

### **Scope**

The purpose of this policy is to establish procedures by which United Spectrographics will board and disembark helicopters and employee behavior and responsibilities while onboard a helicopter. This plan applies to all employees being transported by helicopter. Plan details are also communicated orally as we have fewer than 10 employees.

### **Responsibilities**

United Spectrographics general manager is responsible for implementation of the helicopter safety program and should be contacted in the event that an employee requires further information about the plan or the employees responsibilities.

Employee's are responsible for abiding by the rules laid out in the program and their behavior while onboard any helicopter. Failure to abide by the program rules is grounds for disciplinary action.

### **Procedures**

United Spectrographics employees shall adhere to the heliport rules when boarding and disembarking any flight.

United Spectrographics employees will follow the direction of the helideck or heliport landing officer on how to approach and board the helicopter. The HLO will escort you to and from the helicopter while on the helideck.

United Spectrographics employees personal gear shall be properly stowed inside a bag or case while in the vicinity of helicopter operations.

United Spectrographics employees wearing PPE while in the vicinity of helicopter operations must have the PPE secured to their body. (Chinstraps for hardhats)

Smoking is not permitted anywhere in the vicinity of helicopter operations.

Cell phone use is not permitted while onboard any helicopter.

United Spectrographics employees shall not transport hazardous chemicals on a helicopter at any time. Failure to comply with this program will be grounds for disciplinary action.



## PERSONAL PROTECTIVE EQUIPMENT PROGRAM

### Purpose

United Spectrographics is committed to the safety of our employees and has therefore implemented this PPE program to ensure employees are trained and knowledgeable about PPE in the work place.

### Scope

This program applies to all employees that travel and work at our clients facilities.

### Procedures

A written hazard assessment for the work has been completed, signed and is on file.

Technicians are required to wear the following company issued PPE when working at our client locations.

Flame Resistant Coveralls (NOMEX or Treated Cotton)  
Hard Hat With Face Shield (Arc Flash Rated)  
Protective Gloves

There are also customers that require special Arc Flash rated coveralls, hoods and gloves when scanning high power electrical equipment. The proper equipment will be provided to you when required for the job. All PPE is fitted to the employee for safety reasons.

Technicians shall wear a good quality work shoe with chemical resistant soles. Technicians will also be required to adhere to customer specific regulations regarding steel toe safety footwear, safety glasses and hearing protection. Customers should have eye and ear protection available for you if they require it at their location.

Employees provide footwear at their own expense. United Spectrographics LLC is responsible to ensure that employee owned PPE is adequate and maintained properly.

Any damage to PPE must be reported immediately to a supervisor, who will take the equipment out of service and provide the employee with a suitable replacement.

You should inspect all PPE before and after each use to determine it's continued serviceability. Do not use damaged or defective PPE.

Refer to cleaning and proper care information included with the PPE for instruction on cleaning and handling of the equipment.

### Training

PPE training is provided to all employees initially and as needed for changes in required PPE or for employee miss-use, non-use or not understanding PPE use. PPE training is documented and kept in employee files.



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## RESPIRATOR PROGRAM

### **Purpose**

United Spectrographics is committed to the safety of its employees and has implemented this Respirator Program to ensure that employees are knowledgeable about respiratory hazards in the workplace.

### **Scope**

This program applies to all employees that travel and work at our customer facilities.

### **SCBA & CHEMICAL Respirators**

United Spectrographics employees do not wear chemical or SCBA respirators.

In the event of an unexpected chemical leak, mists, dust, or other potential exposure you should follow the evacuation instructions of the Emergency Action Plan for the facility where you are working.

The client employee with which you are working will be familiar with the emergency action plans of the facility and the evacuation procedures for the area in which you are located.

If a particular chemical hazard is present that would require the use of a respirator to enter the area, employees will avoid the area until the area is cleared of any respiratory hazards and the all clear is given by the HSE manager.

SCBA and Chemical respirator use is highly regulated. Training and Fit Testing are required before you can be authorized to use them.

If a client has an area to be entered that may requires the use of a SCBA or chemical respirator, United Spectrographics employees will not enter the area.

### **Particulate Respirators**

Particulates are something we are exposed to everyday in our lives. Dust, pollen, mold are all things commonly found in the air at any given time.

However, many particulates that you may be exposed to in an industrial environment can have serious consequences on your health. Asbestous, coal dust, cotton dust and cement dust are just a few of the things you may come into contact with while on the job.

Individual client locations must perform a respiratory hazard analysis and be aware of these conditions at their facility.



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The client HSE supervisor is responsible to let our employees know about these hazards.

If employees suspect an area they are entering should require a particulate filter, they shall refuse entry into the area.

### **Medical Evaluation & Fit Testing**

An understandable, confidential, convenient medical evaluation is done during normal work hours for all employees annually in order to assure that they are fit for duty. Employees will be given time to discuss the results with the health care professional conducting the exam.

### **Procedures**

Employees must evacuate any area they suspect may expose them to harmful particulates or chemicals.

United Spectrographics LLC employees are NOT authorized to work in IDLH atmospheres under any circumstances.

United Spectrographics LLC nor its employees provide or maintain respirators. It is the responsibility of our client HSE supervisor to provide information on potential exposures at their facility so that those areas may be avoided.

### **Training**

Employees are trained on this program initially and annually thereafter. The respiratory program is administered by Mark Jackson, V.P of Technical Operations.



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## **Rigging & Material Handling Program**

### **Purpose**

United Spectrographics is committed to the safety and well being of its employees and has implemented this Material Handling Program to ensure that our employees are trained and knowledgeable about material handling in the workplace.

### **Scope**

This program applies to all employees that may encounter material handling equipment or rigging projects in the course of occupational activity.

### **Procedures**

**United Spectrographics employees are not to participate in rigging or material handling activities of any kind or for any reason.**

Employees are not to operate material handling equipment for any reason as they are not trained or qualified in this activity. This includes but is not limited to Cranes, Forklifts, Pallet Jacks and two or 4 wheel dollies that are used for moving heavy materials or equipment.

Employees are not to participate in rigging activities for the purpose of lifting heavy materials.

Employees are to constantly be aware of their surroundings in the workplace as many locations where we work have Material Handling Equipment. This equipment may be operated by people or it may be automated.

When passing through doorways, always be aware of forklift traffic or overhead cranes that may be in the area.

When in areas with overhead cranes, be aware of loads passing overhead and keep clear of the area underneath the load.

### **Training**

Training on this program is given to employees initially and annually thereafter.



## Hazard Identification and Risk Assessment Program

### **Purpose, Applicability and Scope**

United Spectrographics, LLC has established this written safety policy and implemented procedures to ensure that hazard identification and risk assessment will be part of routine safety procedures in the workplace. This includes customer work locations during a service project, and during a Technician service assignment.

This program outlines methods for the identification of hazards and the assessment and control of health and safety risks in the Company workplace.

This policy applies to management and employees during the course and scope of Company workplace operations.

### **Actions**

Regarding hazard evaluation and risk assessment in workplace locations, before any work begins, employees will:

Consult with the Client Safety Coordinator and Maintenance Personnel to ensure that a written Job Hazard Analysis (JHA) is conducted prior to beginning work. The JHA meeting should include representatives from all areas to be affected by the planned project so that any safety concerns may be addressed during that time;

Conduct Job Safety Analysis (JSA) as an ongoing tool for hazard and risk evaluation. This will be done in accordance with procedures as specified in the Company's written Safety & Health Programs.

JSAs will be utilized on a schedule and in the manner determined in coordination with the Company's management as well as the client's designated person(s) for site safety management.

Employees and client personnel will utilize and be actively involved in processes for identifying workplace hazards and evaluating risk in accordance with this program and any client safety programs and procedures specified therein.

JSA and other hazard/risk evaluation processes will be utilized for both routine and non-routine work operations, as well as whenever there is a change or supplement to procedures in place that could impact the safety and health of employees and other persons at the work location.



## **Classification and Prioritizing of Hazards**

Hazards identified through processes in this program will be classified and corrective actions will be prioritized based on potential severity and estimated probability.

All identified hazards will be corrected or mitigated in a timely, appropriate manner. Those that are most severe and/or have the highest likelihood of occurrence will be given priority.

These processes will be performed in cooperation with and under review of the Client Safety Coordinator prior to taking any hazard abatement or mitigation action. This prior review may include consultation with persons knowledgeable and experienced with the specific hazard or risk situation to help ensure that proposed actions will not inadvertently create other hazards or risks.

The Client Safety Coordinator will review reports and documentations of corrective actions taken. This will be done to help confirm that the hazard has been effectively eliminated or mitigated.

## **Training**

The Company Managers will be responsible for developing and delivering training to employees on the hazard identification process and how to implement this program effectively.

Training will include instruction in the proper selection and use of personal protective equipment (PPE), regarding both hazards under evaluation, and also as may be required for abatement or mitigation activities.

Individual training will be conducted during the initial phase of a new employees training and annually thereafter at the first of the calendar year. Re-Training will also be done if process changes occur and the need arises.



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## **Scaffolding Program**

### **Purpose**

United Spectrographics is committed to the safety of its employees in the workplace and has implemented this Scaffolding Program to ensure that our employees are trained and knowledgeable about scaffolds and our policy regarding their use.

### **Scope**

This program applies to all employees that travel to and work at our client facilities.

### **Procedures**

United Spectrographics employees are not permitted to construct or participate in the construction of scaffolding at our clients facilities at any time.

Employees are not permitted to use any type of temporary scaffolding; if an overhead area needs to be accessed, a powered man lift with guard rails designed for the purpose shall be used.

### **Training**

Training on this program is provided to employees initially and annually thereafter.



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## SEMS JSA POLICY

### Purpose

United Spectrographics is committed to the safety of our employees and the employees of our clients. We have therefore implemented this policy to ensure that all work is done in a safe manner.

### Scope

This policy applies to all United Spectrographics employees and violation of this policy will result in disciplinary action being taken. Every task our employees perform will have a unique JSA for that operation and it shall be used only for that task.

### Procedures

1. Daily, before any work begins, complete the proper JSA for task.
2. The JSA must identify, record, analyze and address any irregularities, safety concerns or potential safety hazards found during the JSA, work cannot commence until these issues are resolved.
3. The JSA must identify, analyze and record recommended actions to be taken to eliminate or reduce safety hazards.
4. A copy of the completed JSA must be kept onsite and available to employees at all times during the operation.
5. All JSA's must be approved by the onsite person in charge before work can commence.

\*JSA on Following Page



JOB SAFETY ANALYSIS WORKSHEET		
Job Description: Infrared Survey of Electrical Equipment.	Company:	United Spectrographics
	Location:	Company JSA#:
	Date:	
Sequence Of Events	Potential Incidents/Hazards	Methods to Eliminate & Control Hazards
1. Get all paperwork together, JSA, Site Survey, Work Permits	Miscommunication, Violation of Company Policy	Make sure all paperwork is done and all safety equipment mentioned has been completed.
2. Have pre-job safety meeting explaining everything that will take place during duration of job	Someone not knowing what is going on and possible coming into contact with live wires	Explain exactly what is going to be done if something comes up different while doing job. Stop & explain steps to be done to be safe.
3. Gather tools, PPE, Infrared Camera & Inspect Items for safety.	Keep tally on all tools to make sure you leave none inside any electrical enclosures.	After each enclosure is checked, tally each of your tools.
4. Open Enclosures Motors, Panels, Etc.	During infrared survey all equipment that you are inspecting must be energized & in use. Therefore we will be coming into close to live voltage with camera, hands, and hand tools.	Make sure you do not get to close to any exposed buss work. Stop, and ask for help if enclosures are bulky, heavy or hard to handle.
5. Surveying enclosures.	Electrician bumping surveyor into possible line voltage or surveyor bumping electrician while working in such close quarters.	Watch every move you make and make them very carefully.
6. Closing Enclosures	Tools left inside, touching exposed buss or components	Tally tools, watch hand placement, close doors by handle provided.
7. Clean up work area	Extension cord trips, lost tools, unsafe work area for the next person coming through.	Clean everything up even if you didn't leave it there.
8. Close out paperwork	Miscommunication	Close out paperwork per company policy.



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## **SHORT SERVICE EMPLOYEE PROGRAM**

### **Purpose**

United Spectrographics is committed to the safety of our employees that may be less experienced due to the time they have been employed. United Spectrographics has implemented this SSE safety plan to provide for the safety of our employees. The purpose of this policy is to establish policies for United Spectrographics Short Service Employees.

### **Scope**

A Short Service Employee is one who has been with the company for less than 2 months. This plan applies to all employees. Plan details are also communicated orally as we have fewer than 10 employees.

### **Responsibilities**

United Spectrographics general manager is responsible for implementation of the SSE program and should be contacted in the event that an employee requires further information about the plan or the employees responsibilities.

Employee's are responsible for abiding by the rules laid out in the program and their behavior while at any of our clients facilities. Failure to abide by the program rules is grounds for disciplinary action.

### **Procedures**

United Spectrographics Short Service Employees shall be mentored by an experienced knowledgeable employee after they have completed an initial training period at the office and will work with the experienced knowledgeable employee for approximately 1 to 2 months. SSE personnel will never work alone and are constantly monitored by their trainer and managers to ensure the SSE complies with safety policy and procedures.

This initial training period is usually one to two weeks and provides training for job skills, safety orientation and equipment operation. This initial period also consists of drug testing and background checks.

United Spectrographics will never send a SSE to a client location without first notifying and asking permission to train someone at the customer facility. The SSE will wear an ID card identifying them as a trainee so other personnel will recognize their status as an SSE.

United Spectrographics does not use subcontractors to complete our projects and therefore the subcontractor requirement for this policy is not applicable.

Failure to comply with this program will be grounds for disciplinary action.



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## STOP WORK AUTHORITY PROGRAM

### Purpose

United Spectrographics is committed to the safety of our employees and in order to assure employee safety United Spectrographics has implemented this Stop Work Authority safety plan to provide for the safety of our employees.

### Scope

The purpose of this policy is to establish policies for United Spectrographics Employees that gives any employee the authority to stop work if they feel that the HSE risks involved in completing a task are not clear or fully understood. Employees are training initially before assignment and annually thereafter. Plan details are also communicated orally as we have fewer than 10 employees.

### Responsibilities

United Spectrographics general manager is responsible for implementation of the Stop Work Authority program and should be contacted in the event that an employee requires further information about the plan or the employees responsibilities.

Employee's are responsible for abiding by the rules laid out in the program and their behavior while at any of our clients facilities. Employees have the responsibility to work safely and to observe others in their vicinity to ensure they are working safe and following the policies and procedures outlined in the safety manual. An employee who initiates a Stop Work Intervention will not be reprimanded for the action.

### Procedures

If work is stopped under this policy, work cannot resume until all issues and concerns are resolved.

A Stop Work Intervention must follow certain steps. **STOP**; Stop work when any employee feels that there are safety issues that need to be resolved. **Notify**; management that work has been stopped for safety so a JHA meeting can begin. **Correct**; Correct the issues and verify that the action taken is effective. **Resume**; Resume work after corrective action is completed and verified.

All Stop Work Interventions will be documented and reviewed by management in order to prevent similar occurrences in the future

Management will follow up with employees affected by a stop work intervention after review to ensure that all work activity has returned to normal and to review any changes to safety procedures.

Failure to comply with this program will be grounds for disciplinary action.



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## **WATER SURVIVAL/OFFSHORE ORIENTATION PROGRAM**

### **Purpose**

United Spectrographics is committed to the safety of its employees when working offshore and has implemented this Water Survival/Offshore Orientation Program in order to ensure that employees are properly trained and can respond appropriately if needed in an offshore emergency situation.

### **Scope**

This program applies to all United Spectrographics employees that work at offshore installations.

### **Requirements**

Employee shall report to the shore base/heliport properly dressed.  
*or open toe shoes are allowed during transportation.*

*\*No short pants*

Employee shall report to the shore base/heliport with all required personal protective equipment (PPE Hard Hat, Steel Toe Boots, Safety Glasses, FR Coveralls).

Employees shall not possess or transport any firearms, illegal drugs and/or alcoholic beverages while on client properties. These properties are extended to automobiles, marine transportation, air transportation, and all jobsites.

No horseplay is allowed, employees are to conduct themselves in a responsible, professional manner at all times. The safety of people is our highest priority.

### **Transportation**

#### **Heliport/Air Transportation:**

Employees shall:      Report to the heliport in a timely manner.  
                                 Park in the designated area.  
                                 Report to the facility's dispatcher  
                                 Sign the manifest with name, body weight, cargo weight, and destination.

Once name is called, follow the dispatcher's direction and report to the correct helicopter.

The pilot of the helicopter is in command.

Approach the helicopter after the pilot has given you instructions to do so.

Never approach the helicopter from the rear and always be aware of the main and tail rotors.

Never go under the tail section of the aircraft to get to the opposite side, always go around the front of the aircraft to get to the opposite side.



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All cargo must be placed in the cargo compartments of the aircraft.

All helicopter flights over water require the use of a PFD.

Prior to entering the helicopter, appropriately don the PFD that is supplied in the aircraft.

Due to center of gravity and weight distribution, the pilot may assign you to a particular seat.

Once in the aircraft, sit in the assigned seat, fasten the seat belts and apply hearing protection. No horseplay is allowed during helicopter operations.

No smoking in the helicopter or the helicopter landing zones.

Prior to take off, the pilot will brief the passengers of the safe operations of that aircraft and the location of safety equipment (first aid kits, life rafts and floatation devices on the helicopter's landing skids) for that particular aircraft.

When disembarking the helicopter, exit the helicopter before doffing the PFD.

Pay close attention to rotating blades while unloading cargo and leaving landing zone.

Signal pilot when you have cleared possessions from landing zone.

Once on the facility, the Company employee is to report to the dispatcher/company representative for a site-specific orientation.

**Shore Base/Marine Transportation:**

Employees shall:     Report to the shore base in a timely manner.  
                              Park in the designated area.  
                              Report to the facility's dispatcher.  
                              Sign the manifest with name, body weight, cargo weight, and destination.

Once name is called, follow the dispatcher's direction and report to the correct boat.

The captain of the vessel is in command.

To board the vessel the Company employee shall don their personal PFD, use the personnel ramp and follow the instructions of the vessel's crew.

The vessel's crewmembers shall brief passengers of where to place cargo, location of additional PFD's, fire extinguishers, restrooms, smoking areas, radios, eating areas, and living quarters.

If the employee elects to sleep during the boat ride, remove shoes prior to lying across the seats.

Disembarking - there are two (2) methods to disembark the marine vessel and both methods require the employee to don their PFD.

The first, and most desired method, is with the use of a personnel basket.



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The employee places his/her feet on the bottom ring (knees slightly bent for shock absorbing) and hangs onto the basket's netting while being lifted.

The second choice of disembarking the vessel is with the use of swing ropes.

The employee is required to swing from the rear of the vessel to the platform with the use of a hanging rope.

Heavy tools and equipment shall be placed in a cargo basket in order to be removed from the vessel.

Once on the facility, the Company employee shall report to the facility's dispatcher/company representative for a site-specific orientation.

### **Water Survival**

In an emergency situation, always ensure that you have your PFD with you. Type 1 PFD's provide the most buoyancy than work vest PFD's that are used when transiting from shore to vessel or vice versa.

Do not jump into the water unless it is the only means of evacuation. When in the water, stay calm, stay in a group, conserve energy, conserve body heat and await assistance.

### **Site Specific Inland/Offshore Orientations:**

Once on location and prior to commencing any work, the Company employee shall ask for a site-specific orientation.

During this orientation, the employee will gain knowledge on the following:

Sign in Book – will supply a method to track Persons on Board (POB)

The whereabouts of the "Station Bills", what the employee will be responsible for in case of an emergency and where to report in case of an emergency.

The "Station Bill" will provide escape routes and methods of disembarking/abandoning the facility.

Location of PFD's inside the living quarters, PFD's outside the living quarters and the location of life rafts/survival crafts.

Living arrangements (assigned bunk, restrooms, galley and recreation room).

How to distinguish between production alarms and emergency alarms.

The location of Emergency Shut Down (ESD) devices, fire fighting equipment, and first aid equipment.

Posted areas that exceed 85 dBA where hearing protection is required.

Designated smoking areas.

Client's reporting procedures for any and all incidents - no matter how minor.



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## **Training**

All Training shall take place at approved 3rd party facilities selected by United Spectrographics management.

All training records will be maintained at United Spectrographics office.

All employees working on Inland and Offshore Waters shall attend HUET/WATER SURVIVAL initially and renewed as required thereafter.

All employees working on Inland and Offshore Waters shall attend annual training on Marine Trash and Debris Awareness.

All employees working on Inland and Offshore Waters shall attend Rig Pass training initially and renewed as required thereafter.



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**THE FOLLOWING PAGES CONTAIN  
COMPANY POLICIES**



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## **GENERAL WORK POLICY OUTLINE**

1. Policy Statement
2. Policy General Work Environment
3. Policy Customer Equipment
4. Policy Electrical Safety
5. Policy HAZCOM & SDS
6. Policy Substance Abuse
7. Policy Vehicular Safety
8. Policy Personal Appearance & Hygiene
9. Policy Disciplinary Actions



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## WORK HEALTH AND SAFETY POLICY

### **Goals**

This policy:

- shows the commitment of United Spectrographics management and workers to health and safety
- aims to remove or reduce the risks to the health, safety and welfare of all workers, clients and client employees, and anyone else who may be affected by our business operations
- aims to ensure all work activities are done safely.

### **Responsibilities**

#### ***Management:***

Will provide and maintain as far as possible:

- a safe working environment
- safe systems of work
- plant and substances in safe condition
- facilities for the welfare of workers
- information, instruction, training and supervision that is reasonably necessary to ensure that each worker is safe from injury and risks to health
- a commitment to consult and co-operate with workers in all matters relating to health and safety in the workplace
- a commitment to continually improve our performance through effective safety management.

#### ***Workers:***

Each worker has an obligation to:

- comply with safe work practices, with the intent of avoiding injury to themselves and others and damage to plant and equipment
- take reasonable care of the health and safety of themselves and others
- wear personal protective equipment and clothing where necessary
- comply with any direction given by management for health and safety
- not misuse or interfere with anything provided for health and safety
- report all accidents and incidents on the job immediately, no matter how trivial
- report all known or observed hazards to their supervisor or manager.



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### **Implementation of Policy**

**Information:** The General Manager or Safety Advisor will ensure that all employees have access to the Health and Safety Policy. Each employee will be given a copy of the general policy on commencement of his or her employment.

Also all employees should know where the first-aid kit is located, have a copy of the emergency plan and be trained on the emergency plan and evacuation procedures.

**Risk assessment:** it will be undertaken for all members of staff, work activities and systems annually. It consists in identifying the hazards; identifying who might be harmed and how; evaluating the risks from identified hazards.

If there are no hazards, there are no risks. Where risks are already controlled in some way, the effectiveness of those controls needs to be considered when assessing the extent of the risk that remains.

The results of the risk assessments will be recorded in writing, and safety procedures adjusted to ensure adequate levels of health safety and welfare.

### **SPECIFIC SAFETY RULES**

- Observe and practice the safety procedures established for the job.
- If you spot any possible hazardous situation report it to your supervisor immediately.
- In case of sickness or injury, no matter how slight, report at once to your supervisor. In no case should an employee treat his own or someone else's injuries. In case of any accident resulting in a severe injury, the employee is not to be moved until medical attention has been given by authorized personnel.
- Wear protective equipment, such as ear plugs, safety glasses, masks, gloves, hair nets, etc.
- Do not touch customer equipment.
- Keep your work area clean.
- Observe smoking regulations.
- Do not engage in practices that may be inconsistent with ordinary and reasonable common sense safety rules.

Richard Lincourt

General Manager



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## WORK SAFETY

All work areas must be clear and orderly to prevent slips, falls, and scrapes.

All technicians are responsible for ensuring that the areas in which they will be working are free of any trip hazards and if not, then inform the customer representative that the area needs attention before work can begin.

Area's should be have adequate lighting in order to prevent falls and tripping over unseen objects.

Task specific lighting should be provided where it is needed. Area floors that may be wet or oily can cause slips and falls. You should always use extreme caution on these surfaces.

Technician's shall constantly be aware of the surroundings and anticipate any possible hazards that may present themselves. Keep in mind that the environment may change at any time and an area that was clear could become a trip hazard if someone places an object in the pathway.

Working in different customer locations almost everyday presents the problem of being familiar with your surroundings, knowing the proper exits to use and other proper emergency procedures.

When you arrive at a customer location, try to find a diagram of the building with the emergency evacuation routes shown, if you cannot find one, ask for one. This will enable you to have a general knowledge of the plant layout and possible evacuation routes available.

Ask the person assigned to work with you about where to go if an emergency occurs. There are many emergencies which require you to take into account the wind direction before evacuating the building so you do not expose yourself to hazardous chemicals in the air.

### **EXTERIOR WORKING CONDITIONS**

When working in exterior areas of a customer location, the same rules apply that you use when working indoors. Also, you should be aware of sudden weather changes and get indoors if severe weather conditions warrant such action.



## **CUSTOMER EQUIPMENT POLICY**

Technicians will not touch any customer equipment to open covers, doors or panels to make it available for scanning. This is to protect you from injury and the company from any liability that may occur due to downtime or damage to customer equipment. It is the customer's responsibility to provide enough people to complete the scan in a safe and timely manner.

A technician may provide assistance by placing a supporting hand on a cover to keep it from falling while the fasteners are being removed or installed by the customer representative.

Customer complaints about a technician causing outages or downtime at the customer facility will be investigated and if it is determined that the policy has been violated, it will result in disciplinary action up to and including termination.



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## **ELECTRICAL SAFETY POLICY**

Our electrical safety procedures were developed to protect not only our technicians, but also the electricians and other customer representatives the we work with during our daily activities. Our policy is to ensure that no one is injured while performing our tasks

### **RESPONSIBILITIES**

#### **Customer Representatives**

The customer must ensure that the person assisting us is qualified to perform the work assigned and can do so in a safe and efficient manor.

The customer is responsible for providing enough people to safely access, open and close the electrical equipment during the inspection.

#### **Techicians and Customer Representatives**

Before beginning their job tasks, they must always make a preliminary inspection of all equipment and tools that they will be using to look for obvious hazards. Any hazards shall be corrected before work begins.

Technicians and customer representatives should observe each others actions to prevent accidents. Watching each other to prevent hazardous behavior is essential to a safe work environment.

#### **Technicians**

Technicians should always stand at least 4 feet away when electrical cabinets are being opened to avoid possible exposure to electrical arc flash. When scanning very high voltage cabinets (Greater than 1KV), increase the distance from the cabinets an additional 1 foot per 1KV volts. In small electrical rooms, it may require that you be outside the room while the covers are being removed in order to achieve the necessary distance. After the equipment is open and clear, you can proceed with the scan.

**Technicians shall not touch customer equipment to open and close the equipment for inspection or for lockout/tagout purposes.** The customer is responsible for providing enough people to perform this task. Technicians may assist by placing a supporting hand on covers to keep them from falling while the customer representative removes the fasteners. Technicians may also provide suggestions to the customer representative on the proper method to safely open a cabinet if the customer representative is not familiar with the operation of the release on the device. **Do not press a customer representative to open a cabinet if he/she is uncomfortable about opening the cabinet.**



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Do not allow the customer representative to open electrical panels behind you so that if you were to trip while taking a step back while scanning, you would not fall into the open electrical equipment.

Technicians shall observe the customer representative to ensure that no action taken by him presents a danger to himself or to the technician or the customers equipment.

Technicians shall under no circumstances place their hands inside a customer's electrical cabinet for any reason. If an area is not visible from the angle provided, then remove another cover to view the area or seek some other means to view the area.

Always assume that electrical equipment is energized. Equipment that is not running still may have live electrical circuits and therefore can cause serious injury or death if contact is made with the components.

Our technician's are not authorized to participate in lockout of any customer equipment, as this would violate our policy regarding operation of customer equipment.

Our technician works under direct supervision of our client's personnel and are not authorized to manipulate or operate customer equipment at any time.



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## SDS (Safety Data Sheet)

A safety data sheet is an information document on a given chemical that is located at a facility. Every client location will have an SDS book that is located in a readily accessible location, such as an employee breakroom or cafeteria.

The SDS book gives you information about specific chemicals, such as flammability, reactions with other chemicals or water, exposure hazards and risks, treatment methods and other important handling information for the chemical.

## Procedures

Employees are given information, initial and annual refresher training to maintain their knowledge of working around hazardous chemicals. **United Spectrographics LLC employees do not use, transport to or from, or have possession of, any hazardous chemicals in their daily work activities.**

Employees work at multiple job site locations. Each client location where we work is responsible for development of a site specific HAZCOM program, provide and maintain an SDS information book for that specific location. Each client location will also have a list of hazardous chemicals that is specific to that facility..

All chemicals should be labeled with specific labels identifying flammability, reactions, corrosiveness, etc. These labels should not be removed or transferred to any other container. Also, labeled containers should not be used to store chemicals other than what the label indicates.

Employees must obtain a copy of the SDS sheet for each specific chemical that you may be exposed to from the client safety supervisor and make yourself aware of the hazards of and treatments for exposure to that chemical.

In the event of an emergency, you should follow the directions of the client representative with which you are working as they will be familiar with the emergency plans of the facility and the evacuation procedures for the area in which you are located.

If non-routine work is to be performed, a meeting shall take place between all affected personnel to discuss the risks involved and methods of preventing injuries to personnel.



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## **SUBSTANCE ABUSE POLICY**

### **Scope**

This policy applies to all United Spectrographics employees.

### **Purpose**

United Spectrographics is committed to the safety of our employees and the safety of others and has implemented this policy to ensure that safety.

### **Procedures**

All technicians will be required to take a pre-employment drug and alcohol screening on their first day of employment and continued employment is contingent upon passing the initial test. All drug screening is conducted through DISA out of Houston, Texas.

Thereafter, drug screens will be done on a random selection basis as required by DISA and/or done annually if an employee is not selected at random.

Employee will be subject to drug and/or alcohol testing if company management or client personnel have reasonable cause to believe the employee is under the influence of drugs or alcohol while on the job.

Testing will be done in cases of accident or injury to you, or to someone else as a result of an action by you. Testing positive for an illegal drug or a controlled substance without a prescription will be grounds for termination and you will not be allowed to work at that facility again.

The use of drugs and alcohol while on the job is strictly forbidden and may result in termination. Arriving at a job site under the influence of drugs or alcohol will also be grounds for termination as will a DUI citation while traveling to or from work sites.



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## **DRIVING SAFETY**

### **Stay Safe**

Use a seat belt at all times when operating a vehicle and make sure any passengers use them as well.

Be well-rested before driving.

Avoid taking medications that make you drowsy.

Set realistic goals for the number of miles that you can drive safely each day.

If you are impaired by alcohol or drugs, **DO NOT DRIVE!**

### **Stay Focused**

Driving requires your full attention. Avoid distractions, such as adjusting the radio or other controls, eating or drinking, and looking at your phone or texting.

Continually search the roadway to be alert for situations requiring quick action.

Stop every two hours to take a break. Get out of your vehicle, stretch, walk around to get your circulation going and get refreshed.

### **Avoid Aggressive Driving**

Keep your cool in traffic!

Be patient and courteous to other drivers.

Do not take actions by other drivers personally.

Reduce stress by planning your route ahead of time and having maps and directions for your route. Allow plenty of travel time and avoid crowded roads and busy driving times.

All technicians are responsible for ensuring that their vehicles are maintained and are safe to operate.

### **Be Prepared For The Weather**

Take care on wet or icy roads, defensive driving is the key to staying safe in these conditions. Have food, water and blankets with you in case you get stranded. This is also very important when driving in the desert as the dry heat can dehydrate you very quickly.

Always be prepared for sudden weather changes such as severe thunder storms, tornadoes and floods. Trying to out run a tornado in a car is generally a bad idea. Take cover in a shelter or low lying area to avoid flying debris. Never drive through a flooded area, your vehicle can be swept away very easily in only a foot of water.



## PERSONAL APPEARANCE AND HYGIENE POLICY

Technicians will maintain a professional appearance. This includes haircuts and neatness of facial hair (If Any), coveralls being in good repair and clean.

This policy also includes personal hygiene; Daily showers, use of deodorant, oral hygiene and the use of breath fresheners are important. We do not want to have our clients offended by something such as B.O. or bad breath.

Hair: Technicians will keep their hair cut in neat and professional manner as well as any facial hair they may have. At times, a customer will require the technician to be clean shaven, for safety purposes, in order to allow them on the premises. We will make every attempt to notify you ahead of time if this is required. However, you should be prepared to shave at a moments notice.

Customer complaints about a technician's appearance or hygiene will be investigated and if it is determined that the policy has been violated, it will result in disciplinary action up to and including termination if the problem persists.



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## **United Spectrographics LLC Disciplinary Program**

United Spectrographics has a progressive discipline policy. The goal of United Spectrographics' progressive discipline system is to give the employee an opportunity to correct employment problems that may arise, rather than to punish employees.

The employee will be kept informed of United Spectrographics' rules and the employee is expected to follow them. The General Manager shall enforce disciplinary actions.

United Spectrographics LLC employees work independently onsite at our client's facilities and perform worksite inspections as part of their daily activities.

### **Immediate Disciplinary Action**

United Spectrographics believes that engaging in certain types of misconduct should subject an employee to immediate suspension or discharge, rather than allowing opportunity for correction of behavior through progressive discipline steps. These behaviors are covered in our policy manual.

#### **Disciplinary Steps**

Should there be a problem regarding the employee's adherence to United Spectrographics' or its client's rules, the employee will be given an opportunity to change the unwanted behavior:

The employee will be given an explanation of the errant behavior, including a reiteration of what United Spectrographics' rule regarding that behavior is. In addition, the employee will be advised of the consequences of further infractions of the rule in question. If no further problems occur with regard to the issue raised at the verbal warning stage, no further disciplinary action will be taken.

If the problem persists, the employee will be given an explanation of the errant behavior, including a reiteration of what United Spectrographics' rule regarding that behavior is. In addition, the employee will be advised that continuation of the problem will lead to suspension without pay for a stated period of time. As before, the employee will be given an opportunity to change the unwanted behavior and, if the behavior does not recur, no further disciplinary action will be taken.

If verbal and written warnings fail to bring about a change in the undesired conduct, the employee will be suspended and will be informed that further occurrences of the conduct will lead to the employee's immediate discharge, without additional warnings.

**United Spectrographics reserves the right to bypass the disciplinary steps and base its disciplinary action on the severity, frequency or combination of infractions when circumstances warrant immediate action.**