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October 26, 2011

Confidential

Ms. Betty McCauley, Secretary
Ohio Power Siting Board
180 E. Broad St., 11th Floor
Columbus, OH 43215

Re: Case No. 11-5542-EL-BGA (Hog Creek Wind Farm I)
Case No. 11-5543-EL-BGA (Hog Creek Wind Farm II)
Confidential Documents

Dear Ms. McCauley:

Pursuant to Rule 4906-7-07(H)(4) of the Ohio Administrative Code, I am submitting under seal copies in hard copy and electronic format of confidential financial information contained in the applications filed in Case Nos. 11-5542-EL-BGA and 11-5543-EL-BGA as well as safety manuals from turbine manufacturers. This information contains confidential and proprietary information and should not be released to the public. A motion for protective order has been filed and a public version of these exhibits were also filed.

Please maintain the confidentiality of this information in both cases until such time as the Administrative Law Judge can rule upon the motion for a protective order.

Thank you in advance for your cooperation.

Sincerely yours,

Stephen M. Howard
Attorneys for Hog Creek Wind Farm, LLC

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SAFETY MANUAL

REpower MM100

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Revision Profile

Rev.	Date	Name	Approval Signature	Remarks
0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
0	11/08	Tammy Conekin	On File	ORIGINAL
1				
2				
3				
4				
5				

Original Review Progress

Date	Reviewer	Signature
11/08	J.K. Barrilleaux – Grammar/Technical Format <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Owens O'Quinn – QHSSE Consultant <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Tammy Conekin – Head of Service	On File



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Section I: Overview

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1.0 HSE Policy Statement

Policy Statement

It is the policy and goal of **REPOWER USA** to provide pro-active planning of HSE loss control and operating efficiency in all aspects of our operations. **REPOWER USA** Management and HSE Department are dedicated to providing active leadership and support in developing and maintaining an effective HSE Program. Management is not only interested in the continued growth of our organization, but is also concerned about the health, safety, and environmental well-being of each employee and will make every effort to provide a healthy, safe, and environmentally clean work environment. **REPOWER USA** has every incentive, legal, moral, and economic to minimize hazards that may adversely affect the HSE of our personnel, the security of our property, and the preservation of our environment, as well as the well-being of the public who are exposed to potentially hazardous operations. It is our intention and goal, as a minimum, not only to develop a plan to fully meet required regulatory compliance obligations but also to achieve a level of performance surpassing the best applicable experience similar to ours.

Achieving these goals will require the cooperation and support of each employee with their pro-active participation in:

- Observing all HSE practices and procedures
- Involvement and compliance by fellow employees
- Providing meaningful "feed-back" to Management & HSE Department with the appropriate reporting of substandard conditions and/or practices.

REPOWER USA is aware that no program is of value without the complete support and dedication of every employee. Only pro-active efforts as a **TEAM** will make the program work and help to achieve identified goals. Management & HSE Department will recognize pro-active planning of HSE loss control and operating efficiency achievements in all aspects of our operations.

NO JOB is so IMPORTANT nor any SERVICE so URGENT that EACH EMPLOYEE CANNOT TAKE the TIME to PERFORM OUR WORK in a HEALTHY, SAFE, SECURE & ENVIRONMENTAL OBJECTIVE MANNER and with QUALITY.

It is the premier OBJECTIVE of REPOWER USA to set REASONABLE METHODS to IDENTIFY, RECOGNIZE and MEDIGATION of HAZARDS in the WORKPLACE.

For this reason, unsafe work practices by any employee will be subject to the disciplinary action outlined in the Progressive Disciplinary Policy (e.g. reference RPHSE – 28) and as Senior Management deems necessary to correct the situation, up to and including termination of employment.

Sincerely,

Steve Dayney
CEO USA


2.0 Objectives

The overall objective of the HSE Program is protecting our employees, our clients, community and the public, preventing and controlling accidents, increasing effectiveness of operations, and protecting our environment. Hereafter **REPOWER Systems** will be **REPOWER USA**.

2.1 In addition to these objectives, REPOWER USA is committed to

- Advising each manager, supervisor, and employee of HSE requirements and holding them accountable for their performance
- Recognizing the importance of health, safety and environmental factors where they may be in competition with economic factors
- Complying with all laws and regulations governing health, safety, and environmental protection
- Designing and managing HSE operations to minimize environmental and human health impacts and to provide work places free of recognized HSE hazards
- Identifying, evaluating and monitoring performance in HSE protection.
- Providing professional HSE staff to support health, safety, and environmental protection
- Providing HSE training to protect human, environmental, and physical resources
- Participating in programs designed to continue our knowledge in HSE Management

THIS HEALTH, SAFETY & ENVIRONMENTAL PROGRAM has been DEVELOPED to SUPPLEMENT the POLICY and PROCEDURES FOUND in this MANUAL, the REPOWER USA EMPLOYEE HANDBOOK, and ALL APPLICABLE INDUSTRY & COMMON SENSE STANDARDS THAT are APPROPRIATE to the TASK being PERFORMED in the WORK PLACE ENVIRONMENT.

3.0 Outline

3.1 HSE Communications

- Daily Site-Specific HSE Instructions
- A daily meeting held by the Field Supervisor(s) with his/her crew to discuss job safety, accidents, and/or other job-related information
- HSE Meetings
- A weekly safety meeting conducted by each Field Superintendent/Supervisor with his/her crew with suggested topics and meeting outlines provided by HSE Department, as required
- Pre-job HSE Meetings
- HSE meetings held at specific job site in conjunction with the clients to discuss all aspects of the job are discussed as well as the client's HSE requirements

- Pre-Employment HSE Orientations
- Publications
- A **REPOWER USA** newsletter published quarterly with articles relating to Health, Safety & Environmental issues and company activities
- Other HSE publications that are sent to each job location to serve as source material for HSE meetings
- HSE Performance Reports
- HSE Reports that are developed by the HSE Department and distributed to project and office management
- Reports measuring frequency, severity and cost of accidents per division and/or project
 - **Accident/Injury/Near Miss Investigations**
 - All accidents shall be fully investigated and followed with written reports reviewed at communication meetings
 - Significant incidents (near misses) shall be investigated, reported, and reviewed as indicated above
 - **Inspections**
 - Job Site Inspections shall be conducted weekly
 - HSE Job Site Inspections shall be conducted weekly, monthly, bi-quarterly, and annually (as applicable)
 - Equipment and Tool Inspection shall be conducted weekly and according to OSHA requirements
 - **HSE Recognition Programs**
 - Scheduled Company-Wide Recognition Awards Program
 - Periodic Job or Project Recognition Awards Programs
 - Recognition for Quality Performance by Company Management
 - **Alcohol and Drug Abuse Programs**
 - Pre-Employment Testing
 - Post-Accident Testing
 - Random Testing
 - Probable-Cause Testing
 - Periodic Testing

3.2 Identification and Evaluation of Hazards

REPOWER USA believes that the first step in a complete Health, Safety & Environmental program is to identify and evaluate work place hazards. These hazards will be generally associated with but not limited to machinery, equipment, tools, operations, materials, and the physical area. There are ways to acquire information about work place hazards.

REPOWER USA has elected to begin with **YOU**, our employees. **YOU** are the professional who is familiar with your operations and the hazards associated with them.

The second phase information is obtained is from inspection reports and Accident/Injury/Near Miss Reports. The third way we acquire meaningful hazard information is through hazard analysis. These analysis probe operational and management systems to uncover hazards that may have been overlooked, or developed after the project started, or may exist because original procedures and tasks were modified. The greatest benefit of hazard analysis is that it causes employees to view each operation as part of a system. In doing so, we can assess each step in the operation while keeping the relationship between the steps and the interaction between employees and equipment, materials, the environment, and each other in perspective.

- **Other benefits of this analysis include**

- Pro-active identification of hazardous conditions and potential accidents
- Providing information with which effective control measures can be established, determining the level of knowledge and skill as well as the physical requirements that employees need to execute specific tasks
- Discovering and eliminating unsafe procedures, techniques, motions, promotions, and actions

3.3 General Employee HSE Training

- Orientation-New Employee HSE Training
- Health, Safety & Environmental Policy
- Dress Code (as applicable to job site requirements)
- Housekeeping Procedures
- Hazard Communication
- Personal Protective Equipment (PPE)
- Incident Reporting
- Fire Prevention and Protection
- Access to Exposure and Medical Records
- Drug and Alcohol Abuse Program
- **REPOWER USA Basic HSE Rules**
- Site Specific (as applicable for assignment):
 - Emergency Alarms and Procedures
 - Evacuation Procedures
 - Escape Respirator
 - Safety Shower and Eyewash
 - Hazardous Materials

3.4 Project Employees HSE Training

- Housekeeping (Site Specific)
- Access to Employee Exposure and Medical Records
- Basic and Advanced Fire Fighting
- Hazard Communication
- Hearing Conservation/Hearing Protectors
- Lockout/Tagout/Control of Hazardous Energy

- Respirator Protection/Respirator Training and Fit Testing (as applicable)
- Fall Protection/Ladder Safety/Scaffold
- General/Aerial Lifting Practices
- Permit-to-Work System
- Floor/Wall Openings/Stairways
- Safety Shower, Eyewash and Neutralization Tub
- Personal Protective Equipment (PPE)
- Confined Space Entry
- Hole/Man-way Watch
- Accident Prevention Signs and Tags
- Traffic Control/Safety Barricades
- First Aid/CPR
 - General (Awareness Level)
 - Advanced – First Responder Level (Field Supervision – as applicable)
 - Bloodborne Pathogens
- Hazardous Materials (**HAZMAT**)
- Hazardous Waste Operations and Emergency Response (**HAZWOPER**)
- Assured Equipment Grounding Conductor Program
- Compressed Gas Cylinders
- Overhead Crane Training
- Onshore Crane & Rigging Certification (Operators)
- Basic Rigging and Sling Safety
- Hand Signals
- Hand Tool Safety
 - Portable Grinders
 - Welding, Cutting, and Brazing
- Driver/Fleet Safety
- Personal Conduct
- Office Safety
- Excavations (as applicable at job site)
- Drug and Alcohol Abuse

3.5 Supervisor (Advance) HSE Training

- Accident Investigation (Supervisory Level)
- Disciplinary Action (Supervisory Level)
- HSE Program Enforcement (Supervisory Level)
- First Aid/CPR (First Responder + EMT III Levels as applicable)
- Drug and Alcohol Abuse Training (Supervisory Level)
- Identification and Evaluation of Hazards
- Housekeeping
- Lockout/Tagout/Control of Hazardous Energy
- HAZMAT (Supervisory Level)
- Permit-to-Work (Supervisory Level)
- Confined Space Entry (Supervisory Level)
- Human/Employee Relations
- Technical Skills
- Workers' Compensation
- Company Policies
- Hazard Communication (Supervisory Level)
- Conducting HSE Meetings (Supervisory Level)
- Job Site Inspections (Supervisory Level)

3.6 Hazard Communication (Right-to-Know Compliance) (HAZCOM)

- Hazard Communication Policy
- Chemicals In The Workplace
- Hazard Evaluation
- List of Hazardous Chemicals
- Labeling and Other Identification Methods
- Material Safety Data Sheet
- Non-Routine Tasks
- Outside or Other Employers

3.7 Hazardous Waste Operations and Emergency Response (HAZWOPER)

- Hazard Recognition
- Labeling and Shipping Papers
- Material Safety Data Sheets
- Container Shapes
- Respiratory Protection
- Personal Protective Equipment (PPE)
- Emergency Response Planning

- Hazardous Materials Management
- Spill Assessment and Site Control
- Toxicology/Health Effects
- Monitoring Instruments
- Control and Containment
- Decontamination Procedures
- Fire Extinguishing Procedures
- Rescue and Medical Emergencies
- Media/Community Relations
- 3.8 Community First Aid/CPR – Medic First Aid/CPR**
 - Certified American Red Cross and/or Medic First Aid Instructor
 - CPR/First Aid-Adult, Child, and Infant
- 3.9 Hearing Conservation**
 - Area and Personnel Monitoring
 - Hearing Protection
 - Engineering Controls
 - Personal Protective Equipment (PPE)
 - Employee Training
- 3.10 General Training Program**
 - Hazard Communication
 - Respiratory Protection
 - Hydrogen Sulfide (H₂S)
 - Confined Space Entry
 - Lockout/Tagout/Control of Hazardous Energy
 - Electrical Safety – Qualified – Non-Qualified
 - Fire Prevention and Extinguisher Safety
 - Excavations
 - Aerial, Ladder, Stairways & Scaffolding Safety
 - Accident Prevention Signs/Tags
 - Bloodborne Pathogens
 - Hearing Conservation
 - Permit-to-Work

- Welding and Cutting
- Rigging Fundamentals
- Crane Operations – Mobile

3.11 Project Economic Management

- Maintaining direct contact with treating doctors and auditing of expenses.
- Reviewing claims on a regular basis with Workers' Compensation Carrier.
- Provide restricted or light work duty.
- Constant review of Injuries/Illnesses/Near Misses.
- Pre-employment workers' compensation background checks.

4.0 Roles and Responsibilities

The **REPOWER USA** HSE Program is developed and administered by **REPOWER USA** HSE Department.

The program's overall effectiveness is the responsibility of everyone, with management and supervision being ultimately responsible for the well-being and actions of those employees under their charge. It is also very important for **REPOWER USA** employees to understand that all accidents can be prevented and his or her role in the HSE Program is a very important one.

4.1 Corporate Management

Corporate Management has the ultimate responsibility for the prevention of accidents. Specific responsibility and authority for the implementation of the HSE Program rests with each member of management and supervision.

- Maintain an active progressive HSE Plan that all members of management participate in to form an effective and pro-active HSE Program for the establishment of a safe and healthy work environment
- Provide a work environment in which identified occupational hazards are controlled when elimination is not feasible
- Require that all employees follow established HSE rules and work practices
- Provide adequate financial support for the achievement of all approved HSE Program objectives
- Maintain primary responsibility for the HSE Program, which involves continuing to monitor the HSE Program's effectiveness
- Provide the motivation to get the HSE Program started and to oversee the program's operations
- Actively support the HSE Program with the decisions and directives that are required
- Delegate authority to expedite and facilitate the application of the HSE Program

4.2 HSE Department

- Develop, maintain, coordinate, and manage the HSE Program
- Prepare for and attend Sales Presentations, Performance Evaluations, and Special Customer Committees, and HSE Committees
- Manage Workers' Compensation Program investigations
- Conduct field inspections to determine compliance with all required HSE rules, policies and procedures and report findings to Corporate Management
- Coordinate HSE Recognition Programs
- Evaluate and investigate all injuries, illnesses and incidents
- Assist in development and coordination of HSE training programs
- Maintain and evaluate recordkeeping and statistical reports
- Attend the meetings and conferences of the American Society of Safety Engineers, Safety Councils, and other organizations considered advantageous to professional development
- Attend training institutions and/or seminars that provide current methods and/or systems training in accident prevention and safety development

4.3 Department Managers/Operations Managers

- Assume responsibility and accountability for a superior level of HSE performance in their areas
- Educate and train employees regarding job hazards
- Utilize engineering methods for controlling work place hazards
- Institute work practices that reflect the safest and most efficient methods available for accomplishing assigned tasks

4.4 Field Supervisors

- Assume responsibility for pro-actively supporting the HSE Program
- Assume accountability for the HSE performance of their assigned personnel.
- Instruct each employee in hazard identification of the job and how to avoid and/or control identified hazards
- Advise each employee that the violation of established HSE rules will not be tolerated
- Institute prompt corrective action whenever unsafe acts and/or conditions are observed or reported by employees
- Provide needed HSE equipment or other protective devices for assigned tasks as required
- Conduct regular HSE inspections of their area of responsibility and submit reports as required
- Instill a **REPOWER USA** pro-active HSE awareness in each employee by demonstrating a **REPOWER USA** HSE culture consistent with HSE practices
- Report and investigate all accidents/injuries/near misses to determine causes and implement corrective action to prevent recurrence

- Review all accidents/injuries/near-misses with each employee in their area of responsibility
- Provide applicable HSE training and recurring training to all new employees and transferred employees
- Conduct HSE meetings and be informed on each portion of the HSE Program and related issues
- Enforce good housekeeping practices
- Observe and enforce proper use of Personal Protective Equipment (PPE)
- Ensure that all assigned personnel are informed of the HSE Program
- Ensure that supervised employees are participating in the HSE Program
- Obtain and/or render prompt First Aid to injured employees

4.5 **REPOWER USA Employees, Sub-contractors & Part-time Workers Employees**

- Review HSE Program and Employee HSE Work Practices Handbook and comply with all applicable HSE policies, procedures, and rules
- Support and participate in the HSE Program
- Perform jobs in the safest manner possible
- Report workplace hazards and make suggestions for control and/or elimination of identified hazards.
- Operate in a manner that enhances their personal safety and that of their fellow workers
- Work according to good HSE practices as instructed, discussed, or posted by **REPOWER USA** Management and the HSE Department
- Request and use Personal Protective Equipment (PPE) provided for specific tasks
- Report all accidents, injuries, illnesses, and near misses to their immediate supervisor on the day of occurrence
- Refrain from taking shortcuts in established work practices.
- Attend all HSE meetings and take a pro-active part in the discussions.
- **SHALL NOT** start any work under any unsafe conditions unsafe or questionable circumstances without first bringing these conditions to the attention of the On-Site Supervisor for remediation and/or correction.

5.0 **Audits/Inspections/Meetings**

Each Operations Manager/Field Supervisor will schedule a weekly/monthly job site inspection for each facility assigned to their area of responsibility. A written report (checklist or narrative) is to be completed for each inspection. This report is to be forwarded to the HSE Department for review and retention. The report will cover the identification of recognized hazards, unsafe practices, unsafe conditions, and unsafe tools or equipment. The report shall also indicate any corrective action taken.

5.1 Inspections are to serve two basic functions

- To maintain a safe working environment and control the unsafe actions of people
- To maintain operational profitability - Management inspections can be used to measure Field Supervisory Level performance
- Scheduled HSE inspections should in no way relieve Field Supervisory force of its responsibility for continuous surveillance of **REPOWER USA** employees, equipment and work environment

5.2 Accident/Injury/Near Miss Investigation Reports

An Accident/Injury/Near Miss Report is required for all work-related injuries or illnesses, regardless of the severity. Accidents/injuries/near misses must be reported immediately to the On-Site Field Supervisor. On-Site Field Supervisors are responsible for obtaining the information required to fully complete Accident/Injury/Near Miss Report. All of the information areas on the report must be completed (if unknown, so indicate). The Accident/Injury/Near Miss Reports must be forwarded to the HSE Department within **12 HOURS**. Reporting time constraints mandated by regulations prohibit delays in the submittal of the Accident/Injury/Near Miss Reports.

5.3 On-Site Supervisor's Investigation Report

Often the Accident/Injury/Near Miss Report are vague and inadequate. Each Operations Manager will instruct all first line supervision to conduct an accident investigation of each accident, injury, illness, and near miss. The value of the On-Site Field Supervisor's Investigation Report is to add clarity to the circumstances surrounding the event. The intent of the investigation is to isolate and determine causes and identify methods to prevent recurrence. Once the event that led to the accident is uncovered, a pro-active plan for eliminating further accidents must be developed and implemented. The On-Site Field Supervisor Investigation Report will be prepared and submitted to the HSE Department within **24 HOURS**.

5.4 HSE Meetings

The Operations Manager will instruct each On-Site Supervisor to conduct HSE meetings with all assigned personnel. A written record will be completed indicating the topics discussed, date, and the names of the persons attending the meeting. Meeting records are to be forwarded to the HSE Department. HSE meetings shall be used for the communication of HSE data and employee training needs. Accidents/Injuries/Near Misses and the contributing hazards shall be reviewed with assigned personnel to inform others and prevent recurrence.

5.5 HSE Management System

5.1.1 Introduction

An effective HSE Management System is decisive factor in reducing the extent and severity of work-related injuries and illnesses and their related cost. **REPOWER USA** has instituted such a program and advises and encourages its employees to participate in the established program that provides adequate systematic policies, procedures, and practices to protect them selves and fellow employees. Additionally, follow training practices to recognize, job-related safety and health hazards. Use the tools provided for systematic identification, evaluation, and prevention or control of general workplace hazards, specific job hazards, and potential hazards that may arise from foreseeable conditions.

Although compliance with the law, including specific Federal, State, Local, Company policies and procedures and other regulatory guidelines is an important objective. The effective program goes beyond specific requirements of law to address all hazards. The effective program will seek to prevent injuries and illnesses, whether or not compliance or the law is at issue.

5.1.2 Major Elements of an Effective Management System

The **REPOWER USA** HSE Management System includes the following four main elements:

- **Management Commitment and Employee Involvement**

The element of Management Commitment and Employee Involvement are complementary and form the core of any occupational HSE program. Management's commitment provides the motivating force and the economic resources for organizing and controlling activities within any organization. In this program and the referenced corporate guidelines fully identify and express Management support. In this program management takes the stance that **REPOWER USA** regards worker health and safety as a fundamental value of the organization and applies its commitment to health and safety with as much vigor and economic support as other organizational goals.

Employee involvement provides the method with which the workforce a involved in developing and expressing their commitment to health and safety protection for themselves and for their fellow workers.

REPOWER USA has elected to employ the following actions to implement the **REPOWER USA HSE Management System**.

- Clearly communicate the established worksite policy on HSE working conditions, so that all on-site workforce fully understands and assumes responsibility for the priority and importance of HSE protection within **REPOWER USA**.
- Communicate the **REPOWER USA** goals for HSE Program and Plan. Fully define objectives for obtaining these goals to all workforce members to ensure complete understanding of results desired and measures planned for achieving them.
- **REPOWER USA** will provide visible top management involvement in implementing the HSE Program to communicate management's commitment is serious and all workforce members understand.
- **REPOWER USA** will arrange for a program to encourage employee involvement in the HSE Program/Plan and in decisions that affect their health, safety and environmental welfare to ensure development of a HSE culture that effectively achieves the program's goals and objectives.
- **REPOWER USA** roles and responsibilities have been assigned for all aspects of the HSE Program/Plan communicates to managers, supervisors and employees know what performance is expected of them.
- **REPOWER USA** provides adequate authority and resources to responsible parties for their support in reaching established goals and objectives.
- **REPOWER USA** requires full accountability of managers, supervisors and employees for meeting their respective responsibilities to ensure essential tasks are performed.
- **REPOWER USA** provides the services of an HSE Advisor to annually and/or as applicable to evaluate the HSE Program/Plan in meeting the goals and objectives to ensure deficiencies are identified to form a bases to revise goals and objectives that have not met the context of the plan.
- **Worksite Analysis**
REPOWER USA will provide the services of a HSE Advisor to perform and train On-Site Field Supervisors a practical analysis of the work environment to identify existing hazards, work conditions, and operations in which changes may occur to generate additional HSE hazards.

These analyses will address the following areas:

- Conduct comprehensive baseline worksite survey for HSE issues and periodic comprehensive update surveys involving on-site workforce in this effort.

- Analyze HSE plans for each pre-qualification and job-site processes, materials, and equipment.
- Perform formal job hazards analyses, employee training and review of employee job safety analyses (JSA).
- Perform scheduled and unscheduled job-site HSE inspections to establish an on-going identification of hazards and hazards control.
- Communicate the **REPOWER USA** system for employees in notifying management and supervision of conditions that appear hazardous and receive timely and appropriate responses and encourage workforce personnel to work within the system without fear of reprisal.
- Investigate “ALL” accidents/injuries/near miss incidents to identify the cause and method of prevention. Use established “Root Cause Investigation Methods”.
- Track trends of injuries and identified hazards to establish patterns in common causes and provide methods of future prevention.

REPOWER USA HSE advisor will formulate a report of the job-site analysis and review analysis with on-site workforce, supervision and management for documentation and records.

- **Hazard Prevention and Control**

REPOWER USA has established appropriate hazard prevention and controls within the HSE Manual and Plan. The **REPOWER USA** HSE Manual has hazard prevention and control awareness and evaluation woven throughout its contents. Below are some of the key areas to reference information requirements.

Reference:

- 7.1.2 RPHSE – 2 Job Site HSE Inspection – Job HSE Analysis
- 7.1.5 RPHSE – 5 Personnel Protective Equipment (PPE)
- 7.1.5A RPHSE – 5A Respiratory Protection
- 7.1.6 RPHSE – 6 Hearing Conservation
- 7.1.7 RPHSE – 7 Permit-to-Work
- 7.1.8 RPHSE – 8 Hazard Communication (HAZCOM)
- 7.1.8A RPHSE – 8A Identification and Evaluation of Hazards
- 7.1.12 RPHSE – 12 Fall Protection

- **Training**

REPOWER USA has established a Training Matrix for employees. This training identifies requirements for Management, Supervision, HSE Advisor, contractors and sub-contractors. **Reference Section I – Item 7.0**

6.0 Basic HSE Rules

The purpose of the Basic HSE Rules is to provide a set of basic and enforceable safe working rules, which will help preserve the health, safety, and environmental welfare of our employees.

Compliance with these Basic HSE Rules is essential at all times. Each member of Management and Supervision is charged with ensuring compliance by all of their assigned personnel.

In the event the Basic HSE Rules conflict with other rules applicable to a specific job site, the most stringent rule or safest practice will prevail. These Basic HSE Rules are presented to each **REPOWER USA** Project employees during HSE Orientation or Job Site Orientation. Any violation of Basic HSE Rules will be considered cause for Progressive Disciplinary action.

7.0 Training

7.1 HSE, Skill & Trade Craft Training

The HSE Department shall develop and implement a training program that will provide training for each new employee and existing employees in a new work environment. Training programs are designed to assist the employee in correct work procedures, the use of required personal safety equipment, and where to get assistance when needed.

The HSE Department will routinely monitor this training. Specialized training must be conducted for those employees working in the offshore environment and for other work assignments where unusual hazards or regulatory requirements may exist. All employees will receive training in the recognition of hazards, avoidance and prevention of unsafe conditions, and the regulations applicable to the work environment to control or eliminate any hazards or exposures to illness or injury.

8.0 Recordkeeping

Systems shall be established and maintained by the HSE Department to ensure records are kept in accordance with applicable regulations and internal company procedures.

8.1 Such records shall include, but are not be limited to

- Accident/Injury/Illness/Near Miss Reports and Logs
- Accident/Injury/Near Miss Investigation
- Employee Training Records
- HSE Meeting Minutes
- Job Site Inspection Reports
- Driver Qualification Records
- Injury/Illness Statistics
- Vehicle Accident Statistics
- Employee Medical Files

9.0 HSE Manual Evaluation

The final process in hazard control is to evaluate the effectiveness of a HSE Program.

9.1 Evaluation involves answering the following questions

- Is there a reduction of injuries, workers' compensation cases, and damage losses
- What impact are the above answers having on improving operational efficiency and effectiveness

The HSE Department will examine the program to see if it has accomplished its objectives and whether the objectives have been achieved in accordance with the program plan.

REPOWER USA Management and/or HSE Department may elect to have the HSE Manual evaluated by a Third Party Group to satisfy Client or Regulatory requirements.

9.2 Criteria used to determine effectiveness of the HSE Program are

- Number and severity of injuries to workers compared with work hours
- Cost of medical care
- Material damage costs
- Facility damage costs
- Equipment and tool damage or replacement costs
- Number of days lost from accidents

A major indicator of the effectiveness of a HSE Program is the experience rating (EMR) given to us by the insurance carrier responsible for paying Worker Compensation. This EMR is a comparison of the actual losses of **REPOWER USA** with the losses that would be expected from a risk of such size and classification. Experience rating determines whether the individual risk is better or worse than the average and to what extent the premium should be modified to reflect this variation. Experience modification is determined in accordance with the Experience Rating Plan (ERP) formula, which has been approved by the insurance commissioners. Loss frequency is penalized more heavily than loss severity because it is assumed that the insured can control the small loss more easily than less frequent, severe loss.



Section I Forms & Information

Valid from: November 2008

Section I – Forms & Information Form 1 – General HSE Responsibilities

General HSE Responsibility Chart (Page 1)

Position	Responsibilities
Corporate Management	Maintain an active progressive HSE Plan that all members of management participate in and form an effective and pro-active HSE Program for the establishment of a safe and health work environment.
	Provide a work environment in which identified occupational hazards are controlled when elimination of hazard is not feasible.
	Require that all employees follow established HSE rules and work practices.
	Provide adequate financial support for the achievement of all approved HSE Program objectives.
	Maintain primary responsibility for the HSE Program, which involves continuing to monitor the HSE Program's effectiveness.
	Provide the motivation to get the HSE Program started and to oversee the program's operations.
	Actively support the HSE Program with the decisions and directives that are required.
	Delegate authority to expedite and facilitate the application of the HSE Program.
	XX
HSE Department	Develop, maintain, coordinate, and manage the HSE Program.
	Prepare for and attend Sales Presentations, Performance Evaluations, and Special Customer Committees, and HSE Committees.
	Manage Worker's Compensation Program investigations.
	Conduct field inspections to determine compliance with all required HSE rules, policies and procedures, and report findings to Corporate Management.
	Coordinate HSE Recognition Programs.
	Evaluate and investigate all injuries, illnesses and incidents.
	Assist in development and coordination of HSE training programs.
	Maintain and evaluate recordkeeping and statistical reports.
	Attend the meetings and conferences of the American Society of Safety Engineers, Safety Councils, and other organizations considered advantageous to professional development.



Section I Forms & Information

Valid from: November 2008

General HSE Responsibility Chart (Page 2)

HSE Department	Attend training institutions and/or seminars that provide current methods and/or systems training in accident prevention and HSE development.
	XX
Department & Operations Managers	Assume responsibility and accountability for a superior level of HSE performance in their areas.
	Educate and train employees regarding job hazards.
	Utilize engineering methods for controlling work place hazards.
	Institute work practices that reflect the safest and most efficient methods available for accomplishing assigned tasks.
	XX
Field Supervisors	Assume on-site responsibility for pro-active support for the HSE Program.
	Assume accountability for the HSE performance of their assigned personnel.
	Instruct on-site employee in hazard identification of the job and how to avoid and/or control identified hazards.
	Advise each employee that the violation of established HSE policies and procedures will not be tolerated.
	Institute prompt corrective action whenever unsafe acts and/or conditions are observed or reported by employees.
	Provide needed HSE equipment or other protective devices for assigned tasks as required.
	Conduct regular HSE inspections of their areas or responsibility and submit reports as required.
	Instill a REPOWER pro-active HSE awareness in each employee by demonstrating a REPOWER HSE culture consistent with HSE practices.
	Report and investigate all accidents/injuries/near misses to determine causes and implement corrective action to prevent recurrence.
	Review all accidents/injuries/near misses with each employee in their area of responsibility.
	Provide applicable HSE training and recurring training to all new employees and transferred employees.
	Conduct HSE meetings and be informed on each portion of the HSE Program and related issues.
	Enforce good housekeeping practices.
	Observe and enforce proper use of Personal Protective Equipment (PPE).
	Ensure that all assigned personnel are informed of the HSE Program.
	Ensure that supervised employees are participating in the HSE Program.
	Obtain and/or render prompt First Aid to injured employees.
	XX



Section I Forms & Information

Valid from: November 2008

General HSE Responsibility Chart (Page 3)

REPOWER Employees, Sub- contractors & Part- time workers	Review HSE Program and Employee HSE Work Practices Handbook and comply with all applicable HSE policies, procedures, and rules.
	Support and participate in the HSE Program.
	Perform their assigned jobs in a professional and safe manner.
	Report workplace hazards and make suggestions for control and/or elimination of identified hazards.
	Operate in a manner that enhances their personal safety and that of their fellow workers.
	Work according to good HSE practices as instructed, discussed, or posted by REPOWER Management and the HSE Department.
	Request and use Personal Protective Equipment (PPE) provided for specific tasks.
	Report all accidents, injuries, illnesses, and near misses to their immediate supervisor on the day of occurrence.
	Refrain from taking shortcuts in established work practices.
	Attend all HSE meetings and take a pro-active part in the discussions.
	SHALL NOT start any work under any unsafe conditions and/or questionable circumstances without first bringing these conditions to the attention of the On-site Field Superintendent/Supervisor for remediation and /or correction.



Section I Forms & Information

Valid from: November 2008

Section I – Forms & Information

Form 2 – Minimum Training

Employee Minimum Training

Item No.	Training Description	Training Frequency
	Orientation – New Employee HSE Training	
1	REPOWER HSE Policy – December 2008	Initial Hire
2	Job site dress code (as applicable to specific job-site)	Initial Hire
3	Housekeeping	Initial Hire
4	Hazard Communication (HAZCOM)	Initial Hire / Annually
5	Personal Protective Equipment (PPE)	Initial Hire / Annually
6	Accident/Injury/Near Miss Reporting	Initial Hire
7	Fire Prevention & Protection	Initial Hire
8	Access to Medical Records	Initial Hire
9	Alcohol and Drug Program	Initial Hire / Annually
10	REPOWER Basic HSE Rules	Initial Hire
11	REPOWER Site Specific (as applicable to job assignment)	Initial Hire / Annually
	❖ Emergency Alarms and Procedures	Initial Hire
	❖ Site Evacuation Procedures	Initial Hire
	❖ Escape Respirator	Initial Hire
	❖ HSE Equipment	Initial Hire
	❖ (Safety Showers & Eyewash stations)	Initial Hire
	❖ On-Site Hazardous Materials	Initial Hire

Section I – Forms & Information

Form 2 – Minimum Training

Project Employee Minimum Training

Item No.	Training Description	Training Frequency
1	General and Site Specific Housekeeping	Annual
2	Access to Employee Exposure and Medical Records	Annual
3	Basic Advanced Fire Fighting	Annual
4	Hazard Communication (HAZCOM)	Annual
5	Hearing Conservation	Annual
6	Permit-to-Work	Annual
7	Respiratory Protection	Annual
8	Fall Protection	Annual
9	Personal Protective Equipment (PPE)	Annual
10	Accident/Injury/Illness/Near Miss Investigation & Reporting	Annual
11	First Aid/CPR Awareness Level	2 years
12	Hazardous Materials (HAZMAT) Awareness Level	Annual
13	Hazardous Waste Operations and Emergency Response (HAZWOPER) Awareness Level	Annual
14	Natural Occurring Radioactive Material (NORM) Awareness Level	Annual
15	Hand and Portable Tool Safety	Annual
16	Electrical Safety – Equipment Grounding	Annual
17	Crane and Lifting Equipment Awareness Level	Annual
18	Power Lift Truck (Fork Lift) Operation Awareness Level	Annual
19	Vehicle Operation	Annual
20	Welding Operations	Annual
21	Equipment and Process Purging	Annual
22	Hydrogen Sulfide (H2S) Awareness Level (as applicable)	Annual
23	Asbestos Operation Awareness Level (as applicable)	Annual
24	Identification and Evaluation of Hazards	Annual
25	REPOWER Progressive Disciplinary Policy	Annual
26	REPOWER HSE Policy – December 2008	Annual
27	Emergency Response Plan (ERP) Awareness Level	Annual
28	REPOWER Alcohol & Drug Program	Annual
29	Bloodborne Pathogens	Annual



Section I Forms & Information

Valid from: November 2008

Section I – Forms & Information

Form 3 – Minimum Training

Manager/Supervisor Training

Item No.	Training Description	Training Frequency
	Advance Training	
1	ALL items identified in Project Employee Minimum Training	Annual
2	Accident/Injury/Illness/Near Miss Investigation & Reporting (Advance Level)	Annual
3	Progressive Disciplinary Program (Advance Level)	Annual
4	REPOWER HSE Program Enforcement (Advance Level)	Annual
5	First Aid/CPR (as applicable)	2 years
6	REPOWER Alcohol and Drug Program (Supervisory Level)	Annual
7	Identification and Evaluation of Hazards (Supervisory Level)	Annual
8	Hazardous Waste Operation and Emergency Response (HAZWOPER)(Supervisory Level) (as applicable)	Annual
9	Hazardous Materials (HAZMAT) (Supervisory Level) (as applicable)	Annual
10	Human/Employee Relations	Annual
11	Permit-to-Work (Supervisory Level)	Annual
12	Audits/Job Site Inspections (Supervisory Level)	Annual
13	REPOWER HSE Manual & Company Policies	Annual
14	Others (as applicable)(Internal Company)	(as applicable)



Section II INTRODUCTION

Valid from: November 2008

Revision Profile

Rev.	Date	Name	Approval Signature	Remarks
0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
0	11/08	Tammy Conekin	On File	ORIGINAL
1				
2				
3				
4				
5				

Original Review Progress

Date	Reviewer	Signature
11/08	J.K. Barrilleaux – Grammar/Technical Format <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Owens O'Quinn – QHSSE Consultant <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Tammy Conekin – Head of Service	On File



	Section II INTRODUCTION	Valid from: November 2008
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Section II: INTRODUCTION

Section	Topic	Page No.
1.0	Introduction	3
2.0	HSE Philosophy	3
3.0	HSE Manual Revision Request	4

1.0 Introduction

1.1 The Code of Federal Regulations (CFR)

The Code of Federal Regulations, also referred to as the CFR, consists of all the regulations developed by the various regulatory agencies of the U.S. Government. The code is currently divided into 50 titles. Each title covers the regulations of a specific agency or covers a specific subject.

1.2 For example:

United States

Occupational Safety and Health Administration (OSHA)

Environmental Protection Agency (EPA)

Department of Transportation (DOT)

OSHA 29 CFR EPA 40 CFR

MMS 30 CFR DOT 49 CFR

USCG 33 CFR

State and Local Regulatory Requirements

Canada

Canada Occupational Safety and Health Administration

Provincial Trade Craft Training

In addition, there are other federal, state, and local agencies, such as the Texas Railroad Commission (TRC), National Fire Protection Agency (NFPA), State of Louisiana Administrative Code (LA Admin Code), and American Petroleum Institute (API), etc., which also govern specific subjects.

2.0 HSE Philosophy

The **REPOWER USA** Health, Safety & Environmental Manual has been developed to identify health, safety and environmental regulations required by various regulatory agencies, safe work practices, and industry standards. The purpose of this manual is to assist **REPOWER USA** employees in performing work tasks safely and efficiently. All regulations do not, and cannot apply to all job locations and situations. **REPOWER USA** cannot develop a procedure to cover all work situations. Even if this could be accomplished, HSE rules alone cannot prevent accidents. **You** have a personal responsibility for your own HSE protection and for fellow workers. It is the responsibility of every **REPOWER USA** Team Member to be dedicated to the principle of proactive accident prevention, which is an essential part of the planning and execution of every job.

Team Members also determine when and where specific HSE standards and rules should be used. Two types of rules appear in this manual; “shall” rules and “should” rules.

REPOWER USA Senior Management, Department/Head of Service, and HSE Department approval is required before operations can be conducted that conflicts with a **“shall”** rule. It is at the discretion of Department/ Head of Service and On-Site Field Supervisory personnel, with communication with appropriate HSE Department personnel, to decide on the variance and levels of **“should”** rules in their particular operation while understanding the requirements that HSE **shall** not be compromised in any way.

3.0 HSE Manual Revision Request

This form **must be** completed before revisions will be processed for **REPOWER USA** HSE Manual.



Section II Forms & Information

Valid from: November 2008

Section II – Forms & Information Form 1 – HSE Manual Revision Request Form

Date Submitted: _____

Requested revision(s): _____
(Attach a marked up page indicating suggested revisions)

Identify Location: _____
(Section Title) (Section Number) (Paragraph/page)

(Policy/Procedure) (Number) (Paragraph/page)

Request "NEW TEXT": _____
(Attach a copy of "NEW TEXT" that is proposed for review)

Identify Location: _____
(Section Title) (Section Number) (Paragraph/page)

(Policy/Procedure) (Number) (Paragraph/page)

Reason for suggested revision(s): _____

(Policy or Procedure - update, change, spelling, grammar, typographical or other corrections)
NOTE: A marked up copy of suggested alterations MUST accompany this form.

Comments: _____

Approval Levels:

Head of Service/Operations Manager: _____

HSE Department: _____

REPOWER HSE Manager: _____

REPOWER HSE Committee Chairperson: _____

Committee Member: _____

Committee Member: _____

Committee Member: _____

Date: _____

Date Received: _____

Date Reviewed: _____

Date Reviewed: _____

Date Reviewed: _____

Date Reviewed: _____

Date Reviewed: _____



Section III Policy & Procedures

Valid from: November 2008

Revision Profile

Rev.	Date	Name	Approval Signature	Remarks
0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
0	11/08	Tammy Conekin	On File	ORIGINAL
1				
2				
3				
4				
5				

Original Review Progress

Date	Reviewer	Signature
11/08	J.K. Barrilleaux – Grammar/Technical Format <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Owens O'Quinn – QHSSE Consultant <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Tammy Conekin – Head of Service	On File





Section III Policy & Procedures

Valid from: November 2008

Section III: HSE Policy & Procedures

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4.0	Search and Seizure Policy	4
5.0	HSE Meetings	5
6.0	General Personal Conduct	7
7.0	HSE Procedures	8

1.0 Introduction

The primary **OBJECTIVE** and **FOCUS** in HSE for REPOWER USA is to provide a Healthy and Safe place to work, an Environmental goal to leave the environment clean for those that follow us, and to identify hazards, and to prevent accidents and injuries in the work force.

To assist in this goal, **REPOWER USA** Management has developed a HSE Plan and a HSE Manual with the appropriate applicable and enforceable policies and procedures. **REPOWER USA** provides each employee workable methods and applicable policies and procedures to perform their job in a healthy, safe, and environmental clean work environment. The **REPOWER USA** Team Member, contract, part-time, and job-specific employee are to pro-actively support and implement both the philosophy and the letter of this policy. To meet our goal, it is very important for each of us to understand this policy and conduct our daily business in a manner that assures compliance. However, keep in mind that **the decision to work within the HSE Policies and Procedures is YOURS.**

“THINK, and USE YOUR COMMON SENSE!”

If for any reason you suspect the area or operation to be unsafe, **STOP!** Report the situation to your On-Site Supervisor before proceeding with a potentially hazardous task. **ASK** questions. Ask for an explanation of areas that you do not understand thoroughly. Caution must be utilized in each work process. All accidents, regardless of their nature, share three basic characteristics. Your awareness and understanding of these characteristics are fundamental in the prevention of accidents.

- ❖ Accidents/Injuries/Near Misses **are** the results of many accumulative reasons
- ❖ Accidents/Injuries/Near Misses **can** be prevented by the appropriate application of HSE Policies and Procedures
- ❖ Unless these causes are eliminated these same accidents/injuries/near misses **will** continue to occur
- ❖ Remember, each of us can prevent accidents

2.0 Scope and Purpose

This HSE Manual shall be utilized as a tool to help accomplish our goal of a healthy, safe, and environmentally clean work place at all **REPOWER USA** work locations as well as assist you in the specific precautions you **must** take to maintain and improve your safe working environment.

This manual serves as a guide and a reference tool in maintaining a uniform safety policy by specifying **minimum** rules and standards, which are applicable in all areas, and endorsed by **REPOWER USA** Management and the HSE Department. Local, State, and Federal regulations (including but not limited to Federal and State OSHA, MMS, DOT, TRC, and MSHA) may require additional precautions.

Please check with your On-Site Field Superintendent/Supervisor and/or the HSE Department for site-specific procedures that would require additional or specific requirements.

3.0 General Safety Rules

The following rules apply to all **REPOWER USA** employees, contract employees, and the employees of any sub-contractor which does business with **REPOWER USA**.

- ❖ **ALWAYS THINK SAFETY** - Keep in mind that one of your primary responsibilities as an employee is to perform your duties in a safe manner
- ❖ **MAINTAIN a PRO-ACTIVE INTEREST** - Give your undivided attention to HSE discussions, which the Field Superintendent, Supervisor, Management or the HSE Department may introduce to prepare you for new or different work. **ASK** questions if you do not understand thoroughly
- ❖ **ALWAYS be ALERT** - Correct or eliminate an obvious hazard yourself whenever possible. Report all hazards and the corrective measures you have taken to your On-Site Supervisor. If a hazard cannot be corrected immediately mark it until it can be corrected. Personnel coming on duty **must** be informed of any changes or conditions that might present a hazard
- ❖ **NEVER ATTEMPT to do a JOB ALONE** - Use the buddy system, common sense, and safe working practices tell you to call for assistance when needed
- ❖ **LEARN the APPROVED SAFE PRACTICES** – That are applicable to your work and observe them at all times

Failure to observe these applicable HSE rules and regulations could result in serious injury to you and/or a fellow employee. For this reason, unsafe work practices will result in disciplinary action, as management deems necessary to correct the situation, up to and including immediate termination.

4.0 Search and Seizure Policy

This **REPOWER USA** policy is to maintain a work environment that is safe for all employees and others and is conducive to maintaining high work standards. As part of this policy no illegal drugs, intoxicating beverages, explosives, firearms, or other weapons are allowed on **REPOWER USA** or Client facilities, including vehicles, operated by **REPOWER USA**. Illegal drugs include all controlled substances not prescribed by a licensed physician for use by the person possessing them (Reference **REPOWER USA** Policy on Drug and Alcohol Misuse).

As a further precaution, entry into or remaining at **REPOWER USA** operated facilities is conditioned upon the **REPOWER USA** maintaining the right to search the person and the personal effects of the individual for illegal drugs, intoxicating beverages, explosives, firearms, or other weapons or unauthorized possession of **REPOWER USA** property.

Searches may be made without warning and may include lockers, rooms, workstations, desks, and/or other areas operated by the **REPOWER USA** employees, as appropriate. Searches may also be made on departure from any **REPOWER USA** facility. Prior to any search or screening employees, contract personnel and third party sub-contractors seeking admission to the **REPOWER USA** premises or leaving will be requested to sign a form stating that they have read, understood, and consented to the **REPOWER USA** policy on search and seizure. Employees and non-employees have the right not to be searched.

However, the refusal of an employee to submit to a search will be cause for immediate discharge from the **REPOWER USA**. In all cases of a refusal to consent to a search, the responsible supervisor will arrange for the refusing person to be removed immediately from **REPOWER USA** or the Client's property. Non-employees refusing to allow a search will not be allowed entry on **REPOWER USA** property. Prohibited items discovered through a **REPOWER USA** search may be taken into custody and may be turned over to the proper law enforcement authorities, if appropriate. This policy is in effect at all **REPOWER USA** work sites and production facilities owned, operated, contracted or leased by **REPOWER USA** for **REPOWER USA** and/or a Client's use.

5.0 HSE Meetings

5.1 Procedures

Supervisors at all work locations are responsible for holding weekly safety meetings with their assigned personnel (including sub-contractors). These meetings if on a client controlled work site, may be brief, 10-15 minutes in duration. At other work sites controlled by **REPOWER USA**, the meetings could be 15-30 minutes in duration, depending on topics covered (i.e. HSE Meetings held for training purposes might require additional time whereas a HSE Meeting held to warn personnel of a hazard might be briefer).

ALL HSE Meetings will be fully documented on a **HSE MEETING REPORT FORM** to record time, date and topic covered, duration, and person presenting the topic and all personnel attending. This information is required to update employee-training records.

A Safety Meeting should be held immediately following an injury or near miss incident to warn assigned personnel in an effort to preclude similar incidents. A **HSE MEETING REPORT** is required to document this potential hazard for future training.

The HSE Department and Field Supervisor/Operations/Head of Service will meet once each month to evaluate and discuss current safety issues, to develop and/or recommend additional training programs for improving employee's safety performance, and to review recent injuries and accidents. Minutes of each meeting shall be taken to document actions and to identify required training.

5.2 Planning a Safety Meeting

Ensuring that HSE Meetings are effective and interesting is very important to providing employees with tools that enhance their pro-active HSE culture. Pre-Planning is the key to insure that the subject matter is pertinent and that the meeting will be effective and interesting.

The development of a successful meeting plan should include the following points:

- **Advance Preparation** - The planning determines the results. Never conduct a meeting without preparation
- **Select A Major Topic** - Make it timely and practical - one that a group can discuss
- **Obtain Facts & Figures** - Be sure they are correct and complete. Prepare visual aids when possible, such as a simple chart or table
- **Plan the Presentation** - Determine the best way to present the meeting subject. Try to anticipate the group's reactions and questions. Outline the results you want to accomplish
- **Set the Length** - Allow adequate time but set a reasonable limit
- **Be Sincere** - Your sincerity and interest in the workers' welfare must be real
- **Introduce the Topic** - Tell what the meeting will address in simple terms. Use a punch line or some other good lead in. Get the group's attention
- **Present Facts**
- **Arouse Interest** - State highly pertinent facts in an interesting manner.
- **Promote Discussion** - Ask open-ended questions that cannot be answered "Yes" or "No". Encourage members of the group to think individually and collectively. Let them talk
- **Agree On An Action Plan** - Try for group agreement on methods of correction and improvement. Write these down
- **Summarize the Meeting** - Review briefly what has been discussed and decided.
- **Always Follow Up!**
- **Suggestions to help make the meeting successful**
- Control the meeting and prevent it from becoming a "**gripe session**".
- **NEVER** reprimand employees during a meeting as the reprimand will nullify the wanted effect.

The On-Site Field Supervisor or the person conducting the meetings should observe workers' reactions to determine if the meeting is accomplishing its purposes. Constant effort and planning will assure that safety meetings are productive and informative.

6.0 Personal Conduct

6.1 General

REPOWER USA desires a reputation for furnishing qualified and professional personnel, providing Quality work, a Healthy and Safe work environment, and leaving the environment clean for those that follow us, which places tremendous responsibility on every employee. As an employee of **REPOWER USA** your conduct (good or bad) is a reflection on **REPOWER USA**. Therefore, if any employee's Personal Conduct discredits, or lessens the Client's and/or the general public's opinion of **REPOWER USA**, he/she will be subject to disciplinary action up to and including termination.

Each Employee is expected to perform their assigned duties in the manner of a mature qualified professional.

Boisterous or unruly conduct while on duty at a job site **OR** while off duty at any lodging facilities provided by **REPOWER USA** is strictly prohibited and will not be tolerated.

6.2 HSE Violation Disciplinary Action and Enforcement

Any non-compliance or violation of safety rules, policies, and/or procedures observed by anyone **SHALL** be reported to the On-Site Field Superintendent/Supervisors, On-Site HSE Coordinator and/or HSE Manager immediately. If flagrant disregard or violation of safe work rules/practices or a major violation has occurred the On-Site Field Supervisor, Head of Service **SHALL** take such action as deemed necessary to ensure compliance with applicable safe work rules/practices, including but not limited to, the following.

- **First Offense**

The On-Site Field Supervisor or the Head of Service shall write a letter of reprimand to the Employee with copies to the Employee's personnel file and to the HSE Department.

- **Second Offense**

The On-Site Field Supervisor/Operation Manager may order that the Employee be suspended from work without pay for one or more days. A second letter of reprimand **SHALL** be written to the Employee with copies to the Employee's personnel file and the **REPOWER USA** HSE Manager. The Head of Service shall also counsel the Employees' immediate On-Site Field Supervisor on safe work performance.

- **Third Offense**

Employee is **immediately** terminated from employment with **REPOWER USA**.

NOTE: If non-compliance or violation of these safety rules is considered serious enough, the Head of Service and/or Manager of HSE may omit the first or second step listed above, or both, and go to the next step.

6.3 Vehicle Safety Violation Disciplinary Action and Enforcement

REPOWER USA Management and the HSE Department promotes safe driving habits in employees operating motor vehicles during, after and prior to work hours as part of a preventive and pro-active HSE program. "**REPOWER USA vehicles**" refers to **REPOWER USA** owned and/or operated Client owned, leased and/or rented and personal vehicles used on **REPOWER USA** business.

- **Defensive Driving** **REPOWER USA** business will use techniques of Defensive Driving and will attend the HSE Department recommended driving course for the following reasons:

Following any preventable accident.

When an investigation of a moving-traffic violation indicates a need, any unsafe vehicle operation practices by any employee will be subject to disciplinary actions deemed necessary by **REPOWER USA** Management and HSE Department. These actions are to ensure compliance with applicable safe work rules and procedures, including, but not limited to, the following:

- **First Offense:**
Written reprimand and/or two days off without pay
Immediate Discharge
- **Second Offense:**
Immediate Discharge

NOTE: If non-compliance or violation of these HSE rules is considered serious enough, the Field Superintendent/ Head of Service and/or **REPOWER USA** HSE Manager may omit the first step listed above and go to the next step.

7.0 HSE Policies and Procedures

The following is a listing of the **REPOWER USA**/ HSE Policies and Procedures developed by **REPOWER USA** using the appropriate governmental regulations as the basis of the standard. **REPOWER USA** HSE Policies and Procedures shall be used and adhered to by all employees and contractors, as applicable, in the performance of their jobs. These standards **shall not** supersede any governmental regulations but rather to provide guidance and structure to all employees and contractors in the safe execution of their jobs. In the unlikely event any of these standards differ from the associated regulation, the **regulation shall prevail** and supersede the standard.

Anyone noticing any discrepancy in any policy or procedure should notify his/ her On-Site Field Superintendent/Supervisor immediately who in-turn should notify the **REPOWER USA** HSE Manager at appropriate office.

7.1 HSE Policies & Procedures

7.1.1	RPSHSE - 1	Accident/Injury/Near Miss/Incident Investigation and Reporting
7.1.1A	RPSHSE - 1A	Accident/Injury/Near Miss Prevention
7.1.2	RPSHSE - 2	Job Site HSE Inspection - Job HSE Analysis
7.1.3	RPSHSE - 3	General Offices and Warehouse HSE
7.1.4	RPSHSE - 4	Fire Extinguisher Classifications and Rating
7.1.4A	RPSHSE - 4A	Prevention of Fires
7.1.5	RPSHSE - 5	Personal Protective Equipment (PPE)
7.1.5A	RPSHSE - 5A	Respiratory Protection
7.1.6	RPSHSE - 6	Hearing Conservation
7.1.7	RPSHSE - 7	Permit-to-Work
7.1.7A	RPSHSE - 7A	Confined Space
7.1.7B	RPSHSE - 7B	Lockout - Tagout (LOTO)
7.1.7C	RPSHSE - 7C	Safe and Hot Work Permits
7.1.8	RPSHSE - 8	Hazard Communications (HAZCOM)
7.1.8	RPSHSE - 8A	Identification and Evaluation of Hazards
7.1.9	RPSHSE - 9	Hazardous Waste Operations (HAZWOPER)
7.1.9A	RPSHSE - 9A	Emergency Response
7.1.10	RPSHSE - 10	Hand and Portable Tool Safety
7.1.11	RPSHSE - 11	Electrical Safety
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Section III Forms & Information

Valid from: November 2008

Section III – Forms & Information Form 1 – Consent to Search From

I do hereby voluntarily consent to a search of my person, tool boxes, vehicles by Management representative of **REPOWER Systems USA**, my employer. This consent is voluntarily given with full knowledge by me that should the search result in discovery of alcoholic beverages, drugs, drug paraphernalia or other items of contraband that I may be subject to disciplinary action.

Employee Signature

Date

Witness



Section III Forms & Information

Valid from: November 2008

Section III – Forms & Information

Form 2 – General Drug Policy Acknowledgement Form

I have been advised that **REPOWER Systems USA** has adopted a Prohibited Drug and Alcohol Policy for the purpose of maintaining a safe work environment and to protect Company property. That policy is:

The use, possession, distribution, transfer or storage of prohibited drugs, inhalants or alcoholic beverages in or on Company property or being under the influence of drugs, inhalants or alcohol while acting within the scope of employment is prohibited, as is the misuse of legitimately prescribed drugs.

Further, no employee shall report to work under the influence of prohibited drugs or alcohol.

Compliance with this policy, including consent to searches and medical tests, is a condition of employment.

The intention of the Management of **REPOWER Systems USA** is to provide a safe work environment for employees and to protect Company property. Prohibited drugs or alcohol have been determined by Management to be a threat to those goals.

Acknowledged:

Employee Signature

Print Name

Date

	Section III RPSHSE 7.1.1	Valid from: November 2008
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Revision Profile

Rev.	Date	Name	Approval Signature	Remarks
0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
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1				
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Date	Reviewer	Signature
11/08	J.K. Barrilleaux – Grammar/Technical Format Evergreen QHSSE Solutions LLC	On File
11/08	Owens O'Quinn – QHSSE Consultant Evergreen QHSSE Solutions LLC	On File
11/08	Tammy Conekin – Head of Service	On File



**Section III: 7.1.1 RPSHSE – 1
 Accident/Injury/Near Miss/Incident
 Investigation Reporting
 Contents**

Section	Topic	Page No.
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3.0	Reporting	4
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5.0	Investigation Meetings	8
6.0	Classification of Severity	9

1.0 Introduction

RPSHSE 7.1.1 addresses the following procedures:

- Reporting of Accidents/Injuries/Near Miss or Incidents
- Accident Reporting
- Injury Reporting
- Near Miss Reporting
- Incident Reporting
- Accident/Injury/Near Miss/Incident Investigation

After reviewing the 7.1.1 RPSHSE - 1 Procedure each employee and On-Site Supervisor should be capable in reporting an accident/injury/near miss/incident and of conducting a meaningful investigation to prevent the reoccurrence of unsafe acts and/or unsafe conditions.

2.0 Policy

RPSHSE's policy is to report and investigate the following incidents:

- All Injuries and job related Illness, including:
 - First Aid Cases **FAC**
 - Professional Medical Cases **PMC**
 - No Lost Time Accidents **NLTA**
 - Lost Time Accidents **LTA**
 - Fatality Cases **FC**
- Near Miss Incidents
- Spills/Releases
- Vehicle Accidents
- Property Damage
- Major Accidents
- Identified Hazards

A report is required for all on-site accidents, injuries, near misses, incident or illnesses, regardless of the severity.

3.0 Reporting

3.1 Accident/Injury/Near Miss/Incident Reporting

Effective accident/injury/near misses/incident reporting is based on complete and unbiased knowledge of the root cause that resulted in the development of the situation that lead to the incident.

Accuracy and completeness in reporting is critical for the Company, insurance reporting, federal and state mandated reporting, as well as to assist in the development of preventive measures to reduce the probability of and potential for recurrences.

3.2 On-Site Field Supervisor Investigation Report

This report is a detailed investigation about the accident/incident compiled by the immediate On-Site Supervisor and/or investigation team. This report is required for all incidents, even when only a minor injury or near miss occurs. This report is an integral part of Root Cause Analysis during the investigation following the subject incident report.

3.3 Potential Incident (Near Miss) Report

This report is beneficial in recording the information surrounding incidents without injury that have the potential of developing into a serious or fatal incident. The premier purpose in the initiation of this report by the On-Site Field Supervisor is to investigate circumstances leading to and surrounding the incident to assist **REPOWER USA** Management and HSE Operation in planning preventive measures, equipment repairs, and employee training, etc.

4.0 Procedures

4.1 Injury Reporting

An **Injury Report** is required for all work related injuries or illnesses, regardless of the severity. Specific "**1st Report of Injury**" forms for each Country and State are mandatory and required for filing insurance and Worker Compensation claims. This form records the basic information concerning an injury and is the first (1st) and primary report(s) completed by the injured employee(s) and the immediate On-Site Supervisor at the work location.

Reports for injuries that do not require treatment other than first aid should be noted as a "**First Aid Case**". Injuries must be reported immediately to the On-Site Supervisor in charge, preferably before the end of the employee's shift. The On-Site Supervisor is responsible for assisting the employee in obtaining the information required to fully complete the Injury Report. All of the information areas on the report must be completed (if unknown, so indicate).

The Injury Report must be submitted to the HSE Manager within **24 HOURS**. A copy should be kept on site.

Reporting time constraints mandated by regulations prohibit delays in the submittal of the Injury Reports.

4.2 Required Forms for Injury/Illness Reporting

The State and Federal forms are required as follows:

4.2.1 Onshore Operations

- **First Report of Injury or Illness Report**

Required for the initial reporting of any injury and illness at each respective job site in the United States of America. The On-Site Field Supervisor who **DO NOT** have access to the correct State forms and must report job accidents and illnesses in various States should contact the HSE Manager immediately, and/or complete the On-Site Field Supervisor's Investigation Report and submit to the HSE Manager to initiate the reporting process.

- **Supplemental Report of Injury**

Required when an injured employee returns to work or an injured employee has an additional disability due to the injury after returning to work or an injured employee has an increase or decrease in earnings during a temporary return to work status or an injured employee resigns or is terminated.

- **Employer's Wage Statement**

Required when an employee is disabled for at least 8 days. This report will be completed by the HSE Manager upon notification by the On-Site Field Supervisor that the employee has missed 7 days of work.

4.2.2 Offshore and Longshoreman Operations

- **Operation of Labor First Report of Injury or Illness**

Required for the initial reporting of any injury offshore, in dock operations, offshore transportation, and/or long-shore operations.

- **Operation of Labor Supplementary Report of Accident/ Illness**

Required whenever the First Report of Injury or Illness does not show the date employee returned to work or when an injured employee has returned to work and later becomes disabled for work.

- **Operation of Labor Supplementary Report of Disability**

Required when an injured employee is disabled for more than 3 days. This form will be completed by the HSE Manager upon notification by the On-Site Supervisor in charge that the employee has not returned to work by the 4th workday.

It is critical that the On-Site Supervisors maintain daily communication with the HSE Manager on the status of injured employees until the employee returns to full time work with a full Doctors release.

4.3 On-Site Field Supervisor Investigation Report

Often the Injury Report is vague and inadequate. The value of the On-Site Field Supervisor's Investigation Report is to add clarity to the circumstances surrounding the event. The intent of the investigation is to isolate and determine the causes and identify methods to prevent recurrence. The value of the investigation is destroyed if there is a suspicious purpose to place blame. Once the event that led to the accident is uncovered, a positive plan for eliminating further accidents must be developed and implemented.

Each Operation/Head of Service will instruct all first line supervision to conduct an accident investigation of each injury, illness, and/or near miss. The On-Site Field Supervisor Investigation Report will be prepared and submitted to the HSE Manager within **24 HOURS**.

The On-Site Field Supervisor's Investigation Report includes information on the person injured, his/her job title, the tasks being performed at the time of the accident, who directed the work, identifies the witnesses and includes witness statements regarding the accident, and the cause of the accident and what corrective action was taken. The On-Site Field Supervisor Investigation Report is made a part of the official records concerning the incident and must be taken seriously. **Unsatisfactory and/or incomplete reports will not be accepted.**

4.4 Other Reports

The following reports should be filled out and forwarded to the HSE Manager as follows:

- **"Near miss" incidents** without injury that could have been more serious should be reported to the On-Site Field Supervisor and documented immediately in the Near Miss Incident Report.
- **Spill/Release** of chemicals, petroleum products, hazardous materials, etc. must be reported and documented on the Spill Report Form for required environmental compliance.
- **Property Damage and/or Vehicle/Equipment** damage or accidents must be reported and documented on the Property Damage Report for insurance requirements.

4.5 Responsibilities

- **First-Line On-Site Supervisor** - has the responsibility of ensuring an investigation is conducted, verbally informing the Operation/Head of Service and the HSE Manager of any actions that should be taken and completing the appropriate reports. It will be the responsibility of the HSE Manager to direct the Operation/Head of Service to participate as a member of the investigation.
- **Operation/Head of Service** – has the responsibility for maintaining a list of corrective action items for his/her area, assigning the responsible party and establishing a completion date for each corrective action item. The Operation/Head of Service is also responsible for the follow-up of each of the corrections until all are completed, and will act as a liaison between the First-Line On-Site Supervisor and the HSE Manager. Operation/Head of Service should, whenever possible, arrange with the HSE Manager for "light duty" assignments for injured workers who are at partial capacity.
- **HSE Manager** will review all reports, tabulate results and provide trend analysis to management. If the severity of the accident indicates that the injured employee will be absent from work for more than one workday the HSE Manager must be notified of the incident by telephone at the applicable office so that case management activities with the insurance carrier can be implemented. All medical bills should be sent directly to the Worker Compensation carrier from the medical provider. The HSE Manager will verify Worker Compensation coverage for the provider as required. No employee shall be allowed to return to work after treatment and/or rehabilitation without a **Return-To-Work** release from his/her treating physician and notification to the HSE Manager.

5.0 Investigation Meeting

The On-Site Field Supervisors will promptly follow up each reported employee accident/injury/illness, **REPOWER USA** vehicle accident, **REPOWER USA** property damage, and Third Party Accident/Injury/Illness with an investigation report. Investigations should be conducted as soon as possible following notification of the incident.

Good accident investigations help prevent future accidents and protect the **REPOWER USA** from unwarranted liability. The On-Site Field Supervisor investigation must be thorough, requiring a meeting of all involved and investigation of the accident scene in order to pinpoint the true cause of the accident.

This process will help to determine the appropriate corrective action needed to prevent similar accidents from occurring in the future.

- Attempt to visit the accident scene prior to conducting the investigation meeting, if possible. In addition, draw a diagram, take pictures (if permitted), prepare overheads, etc. to assist in the review.
- Arrange a time and place and invite all necessary personnel.
- Arrive early and engage in informal conversation to establish a relaxed atmosphere.
- Start meeting on time. Never be late.
- Open with an introduction (i.e. why we are here) and identify those present, if necessary. **WE ARE HERE TO...**
 - Establish facts of what happened.
 - Not to find fault or establish blame.
 - Discover contributing factors.
 - Develop methods to prevent reoccurrence.
 - Use the "4-W" & "1-H" approach to establish the facts.
 - **When** did it happen?
 - **Where** did it happen?
 - **What** happened?
 - **Why** did it happen?
 - **How** did it happen?

Make a diagram, using a chalkboard, and walk through the accident for demonstration and reference. You may have to back-step to establish prior activities, which might have contributed to the accident/incident.

Ask **When**, **Where**, **What**, **Why**, and **How** until the root causes are found. Make a notation as they are revealed by the investigation team. Start with those directly involved in the accident/incident. Then review the contributing factors.

- Now discuss ways to eliminate or correct the factors that contributed to the accident.
 - Once again, list ideas and review them with the team.
 - Assign the corrective action to the individual responsible.
 - The individuals shall report when the corrective action has been completed.
- Prepare a final investigation report and distribute it to all involved personnel with diagrams or any other attachments.
- Avoid doing the following items:
 - **NEVER** attempt to find fault.
 - **Do Not** blame any person for the accident/incident.
 - **Do Not** humiliate anyone.
 - **Do Not** discuss any disciplinary action at this meeting.

Remember, discuss the facts, reveal the causes or contributing factors and take positive action to prevent reoccurrence.

6.0 Classification of Severity

6.1 First Aid Case (FAC)

Minor injuries such as scratches, cuts, burns, splinters, etc., which do not ordinarily require medical care. Any one-time treatment and any follow up visit for the purpose of observation of minor scratches, cuts, burns, splinters, and so forth, which do not ordinarily require medical care. Such one-time treatment and follow up visit for the purpose of observation is considered first aid even though provided by a physician or registered professional personnel.

6.2 Professional Medical Case (PMC)

Injuries that must be treated **only** by a physician or licensed medical personnel. Injuries that impair bodily function (i.e., normal use of senses, limbs, etc.). Injuries resulting in damage to the physical structure (i.e.: fractures). Injuries that involve complications requiring follow up medical treatment.

6.3 No Lost Time Accidents (NLTA)

An NLTA results when the injured employee has sustained a minor injury and was taken to a doctor or emergency facility due to the potential for a greater injury and to ensure no extended injury and/or illness not apparent to visual evaluation at accident/injury/illness site were overlooked.

6.4 Lost Time Case (LTC)

- An LTC results when the injured employee is unable to return to his/her regular duty, or is on limited/light duty status on the next regularly scheduled workday due to the injury or resulting treatment.
- If the injured is released to a limited/light duty status and **no** limited/light duty is available and he/she begins to lose time, the case shall be considered a LTC.
- Working any part of a workday as well as losing time that same day shall constitute a day worked.

6.5 Fatality (FC)

Any injury resulting in Death.

The HSE Manager may reclassify the severity of some accidents based upon final review of all pertinent documented information.



Section III RPSHSE 7.1.1A

Valid from: November 2008

Revision Profile

Rev.	Date	Name	Approval Signature	Remarks
0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
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1				
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Original Review Progress

Date	Reviewer	Signature
11/08	J.K. Barrilleaux – Grammar/Technical Format <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Owens O'Quinn – QHSSE Consultant <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Tammy Conekin – Head of Service	On File





Section III RPSHSE 7.1.1A

Valid from: November 2008

Section III 7.1.1A RPSHSE – 1A Accident Prevention – Color Codes, Signs, & Tags

Contents

Section	Topic	Page No.
1.0	Introduction	3
2.0	Safety Color Codes	3
3.0	Accident Prevention Signs	3
4.0	Accident Prevention Tags	4
5.0	Tagging and Flagging	5

1.0 Introduction

This standard is designed to establish universal color, codes, signs, and tagging requirements to meet OSHA standards and to minimize incident or injury by ensuring that all personnel are aware of unsafe situations and conditions in the work place. The following are general requirements imposed by OSHA. Additional requirements apply to specific hazards and operations.

2.0 Safety Color Codes

- **RED - DANGER**

- Fire equipment and apparatus
- Danger
- Safety cans or other portable containers of flammable liquids
- Red lights provided at barricades and temporary obstructions
- Danger signs are painted red
- Stop
- Emergency stop button, bars, or electrical switches used for the emergency stopping of machines and equipment

- **YELLOW - CAUTION**

- Should physical hazards such as falling, tripping, or caught between, slow area, etc.

3.0 Accident Prevention Signs

3.1 General

Accident Prevention Signs should meet the following OSHA standards:

- Should denote specific hazards and provide warnings and safety instructions for the personnel and the public who are likely to be exposed to the hazard
- Should be used if failing to indicate a hazard could result in personal injury or property damage.
- Must have rounded or blunt corners and fastened where they do not constitute a hazard.
- Coloring must conform to Table 1 of the *American National Standard* (ANSI) Z53.1.
- Wording is easily read and concise. Contains enough information to be easily understood and make a positive, rather than negative suggestion.

3.2 Types of Accident Prevention Signs

- **Danger Signs** – warn of specific dangers and radiation hazards; indicates immediate danger and that precautions are necessary.
Colors: Red with black or white lettering.
- **Caution Signs** – warn against potential hazards or to caution against unsafe practices.
Colors: Yellow background; black panel with yellow lettering; or black lettering against yellow background.
- **Safety Instruction Signs** – supply general instructions and suggestions relative to safety measures.
Colors: White background; green panel with white lettering; or black lettering against white background.
- **Biological Hazard Signs** – signify the actual or potential presence of a biohazard or infectious agent presenting a risk or potential risk to the well-being of man or identify a contaminated areas (See Biological Hazard Tags for Colors).

4.0 Accident Prevention Tags

4.1 General

- Used as a means to prevent accidental injury or illness to employees exposed to hazardous or potentially hazardous conditions and equipment, or during operations which are unusual, unexpected, or which are not readily apparent.
- Used until the identified hazard is eliminated or the hazardous operation has been completed. Tags are **NOT** required where signs, guarding or other positive means of protection are being used.
- Contain a signal word (Caution, Danger, Warning, etc.) and a major message (Do Not Start, High Voltage, etc.). The signal word should be readable at a minimum distance of five (5) feet or greater as warranted by the hazard.
- Affixed as close as safely possible to the hazard, and attached with string, wire, or adhesive that prevents loss or unintentional removal.

4.2 Types of Tags

- **Danger Tags** – indicate major hazard situations where an immediate hazard presents a threat, death, or serious injury to personnel.
Color: **RED**, or predominantly red, with lettering or symbols in contrasting color.
- **Caution Tags** – indicate minor hazard situations where a non-immediate or potential hazardous unsafe practice presents a lesser threat of personnel injury.
Color: **YELLOW**, or predominately yellow, with lettering or symbols in a contrasting color.

- **Warning Tags** – indicate a hazard level between Caution and Danger, in lieu of the Caution Tag.
Color: **ORANGE**, or predominately orange, with lettering or symbols in a contrasting color.
- **Biological Hazard Tags** – identifying the actual or potential presence of a biological hazard and equipment, containers, rooms, etc. that contain or are contaminated with hazardous biological agents.
Color: **FLUORESCENT ORANGE**, or orange-red, with lettering or symbols in a contrasting color.

5.0 Tagging and Flagging

5.1 Purpose

The purpose of tagging and flagging is to communicate with other people working in the area that a hazard condition or situation exists. Using tagged equipment could result in bodily injury, costly mechanical damage, fire, or the disruption of operations. Before re-commissioning any equipment, the following list is representative of situations where tagging is warranted:

- Valves not in normal operating position.
- Valves that should not be used under normal operating conditions.
- Switches, valves, and blinds used to isolate control lines or equipment undergoing maintenance as outlined in Safety Standard SS13, Lockout/Tagout.
- Defective or leaking valves.
- Equipment, tools, etc., that are unsafe to use.
- Safety or emergency equipment that will not function properly and is unsafe to use.

5.2 Definitions

- **Tag** – a weatherproof tag that is marked with the name of the equipment, the name of the person affixing the tag and the date, time and reason for tagging the equipment.
- **Flag** – a piece of bright orange or red ribbon attached in addition to a tag only when the tag is not readily visible, such as tags on overhead valves. **Flags should never be used without a tag.**

5.3 Procedures

- Tagged equipment requires the following:
 - Equipment name, identification, and the condition, and fault or reason for the tagging to ensure that proper attention is given to needed repairs.
 - Date, time, and signature. If the tag is not readily visible a flag should also be attached.

- Notify your immediate supervisor.
- Tags and flags shall be removed immediately after the conditions change so as they are not left on by mistake. Tags are not substitutes for careful checking of each device prior to re-commissioning equipment or to an operational change.

5.4 Responsibilities

- **Employee** – the responsibility for using tags where necessary belongs to the person repairing equipment, isolating equipment, shutting valves or switches or discovering an unsafe piece of equipment.
- **On-Site Field Supervisor** – the responsibility for acquiring the necessary repairs for tagged items rests with the notified Field Superintendent/Supervisor or designated alternate.

Upon the completion of the assigned job, all signs and tags shall be removed after thoroughly checking that no person will be jeopardized and that the equipment is repaired and functional. Removal of tags should be done by the person that signed the tag; but due to shift changes, etc., it can be removed by the Field Superintendent/Supervisor as outlined in **7.1.7B RPSHSE – 7B, Lockout/Tagout – Control of Hazardous Energy**.



Section III Forms & Information

Valid from: November 2008

Section III – Forms & Information

7.1.1 RPSHSE – 1

Accident/Injury/Near Miss/Incident Investigation Reporting

Form 1 – On-Site Field Supervisor Investigation Report



Section III Forms & Information

Valid from: November 2008

On-Site Field Supervisor Investigation Report (Page 1)

This Report must be completed and sent to the REPOWER USA HSE Manager within 24 HOURS.

Division:

- | | |
|--|---|
| <input type="checkbox"/> WIND TURBINE | <input type="checkbox"/> CORPORATE |
| <input type="checkbox"/> OPERATIONS | <input type="checkbox"/> ENGINEERING |
| <input type="checkbox"/> WORK MANAGEMENT | <input type="checkbox"/> TECHNICAL SERVICES |
| <input type="checkbox"/> OTHER | |

Job Number: _____ **Location:** _____

Facility Address: _____

Name of Injured: _____

Social Security Number: _____

Date of Birth: _____ **Age:** _____ **Sex:** ☐ Male ☐ Female

Home Address: _____

Telephone Number: Home _____ Work: _____

Job Title: _____

Length of Employment with REPOWER USA:

- | | | |
|---|---|--|
| <input type="checkbox"/> Less than 3 months | <input type="checkbox"/> 3 months to 1 year | <input type="checkbox"/> 1 year to 3 years |
| <input type="checkbox"/> 3 years to 5 years | <input type="checkbox"/> 5 years to 7 years | <input type="checkbox"/> More than 7 years |

Accident Time: _____ **Accident Date:** _____ **Day of the Week:** _____

Month/Day/Year that Injured Returned to Work: _____

Activity at the Time of Accident: _____

Describe What Happened: _____

NOTE:

The What, When, Where, Why, and How method to describe accident/injury/incident/near miss being investigated.

Tools, Equipment or Machinery in Use at the Time of Accident: _____

Exact Location of Accident: _____



Section III Forms & Information

Valid from: November 2008

On-Site Field Supervisor Investigation Report (Page 2)

Nature of Injury:

- | | | | |
|---------------------------------------|---|-------------------------------------|--|
| <input type="checkbox"/> Foreign Body | <input type="checkbox"/> Strain/Sprain | <input type="checkbox"/> Dermatitis | <input type="checkbox"/> Skin Irritation |
| <input type="checkbox"/> Cut | <input type="checkbox"/> Contusion/Bruise | <input type="checkbox"/> Puncture | <input type="checkbox"/> Chest Pain |
| <input type="checkbox"/> Burn | <input type="checkbox"/> Hearing Loss | <input type="checkbox"/> Abrasion | <input type="checkbox"/> Vision Loss |
| <input type="checkbox"/> Other: | | | |

Part of Body:

- | | | | | |
|---------------------------------------|----------------------------------|--|--------------------------------------|--------------------------------|
| <input type="checkbox"/> Right | <input type="checkbox"/> Left | | | |
| <input type="checkbox"/> Head | <input type="checkbox"/> Eye | <input type="checkbox"/> Ear | <input type="checkbox"/> Face | <input type="checkbox"/> Neck |
| <input type="checkbox"/> Shoulder | <input type="checkbox"/> Arm | <input type="checkbox"/> Elbow | <input type="checkbox"/> Forearm | <input type="checkbox"/> Wrist |
| <input type="checkbox"/> Hand | <input type="checkbox"/> Finger | <input type="checkbox"/> Chest | <input type="checkbox"/> Lung | <input type="checkbox"/> Groin |
| <input type="checkbox"/> Hip | <input type="checkbox"/> Leg | <input type="checkbox"/> Knee | <input type="checkbox"/> Ankle | <input type="checkbox"/> Foot |
| <input type="checkbox"/> Toe | <input type="checkbox"/> Thigh | <input type="checkbox"/> Scalp | <input type="checkbox"/> Mouth/Teeth | <input type="checkbox"/> Skull |
| <input type="checkbox"/> Back | <input type="checkbox"/> Abdomen | | | |
| <input type="checkbox"/> Other: _____ | | <input type="checkbox"/> Multiple Body Parts | | |

Accident Type:

- | | | | |
|--|--|---|---|
| <input type="checkbox"/> Slip (Not Fall) | <input type="checkbox"/> Fall (Same Level) | <input type="checkbox"/> Fall (Different Level) | <input type="checkbox"/> Struck Against |
| <input type="checkbox"/> Struck By | <input type="checkbox"/> Caught In/Between | <input type="checkbox"/> Vehicle | <input type="checkbox"/> Electrical |
| <input type="checkbox"/> Repetitive Motion | <input type="checkbox"/> Inhalation | <input type="checkbox"/> Absorption | <input type="checkbox"/> Ingestion |
| <input type="checkbox"/> Overexertion | <input type="checkbox"/> Temperature Extreme | | |
| <input type="checkbox"/> Other: | | | |

Hazardous Condition:

- | | | |
|--|---|---|
| <input type="checkbox"/> Improper Guard | <input type="checkbox"/> Safety Devices Inoperative | <input type="checkbox"/> Defective Tool |
| <input type="checkbox"/> Improper Illumination | <input type="checkbox"/> Improper Ventilation | <input type="checkbox"/> Improper Dress |
| <input type="checkbox"/> Hazardous Dust/Gas | <input type="checkbox"/> Poor Housekeeping | <input type="checkbox"/> Congested Area |
| <input type="checkbox"/> Lack of PPE | <input type="checkbox"/> Hazardous Arrangement | <input type="checkbox"/> No Hazardous Condition |
| <input type="checkbox"/> Other: | | |

Agency of Accident:

- | | | | |
|---------------------------------------|--------------------------------------|--|---|
| <input type="checkbox"/> Machine | <input type="checkbox"/> Vehicle | <input type="checkbox"/> Hand Tool | <input type="checkbox"/> Material Handled |
| <input type="checkbox"/> Conveyors | <input type="checkbox"/> Hoist/Crane | <input type="checkbox"/> Building | <input type="checkbox"/> Electrical Apparatus |
| <input type="checkbox"/> Chemicals | <input type="checkbox"/> Ladders | <input type="checkbox"/> Boilers, Vessels | |
| <input type="checkbox"/> Stairs/Steps | <input type="checkbox"/> Floors | <input type="checkbox"/> Sheet/Scrap Plate | |
| <input type="checkbox"/> Other: | | | |

Did Injured Refuse Medical Attention? ☐ No ☐ Yes (Signature Required)

NOTE:

When injured person refuses Medical Attention the ON-Site Field Supervisor "MUST OBTAIN THEIR SIGNATURE" on applicable form.

Severity of Injury:

- | | | |
|---|--|--|
| <input type="checkbox"/> First Aid Case (FAC) | <input type="checkbox"/> Professional Medical Case (PMC) | <input type="checkbox"/> Lost Time Case (LTC) |
| <input type="checkbox"/> Non Lost Time Accident | <input type="checkbox"/> Fatality (FAT) | <input type="checkbox"/> No First Aid Required |

Transportation to Hospital Required: ☐ No ☐ Yes

Transportation Used: _____

Name of Person Accompanying Injured to Hospital: _____

Name and Address of Physician: _____

Name and Address of Hospital: _____

Describe Corrective Action and Give Completion Dates: _____



Section III Forms & Information

Valid from: November 2008

On-Site Field Superintendent/Supervisor Investigation Report (Page 3)

List all Witnesses: _____

List all Personnel assigned to Work Crew: _____

Report Prepared By: _____

Title: _____

Date Signed: _____ Date sent to HSE Manager: _____

APPROVED by HSE MANAGER: _____ Date: _____

Comments: _____

On-Site Field Supervisor

Date

Section III – Forms & Information

7.1.1 RPSHSE – 1

Accident/Injury/Near Miss/Incident Investigation Reporting

Form 2 – Near Miss Incident Report

Near Miss Incident Report

This Report must be completed and sent to the REPOWER USA HSE Manager within 24 HOURS.

Description: _____

Time, Date and Place of Incident: _____

Nature of Incident: _____

All Personnel Involved: _____

Equipment Involved: _____

Description of Events: _____

NOTE:

The What, When, Where, Why, and How method to describe accident/injury/incident/near miss being investigated.

Analysis: _____

Potential Loss Severity: ☐ Major ☐ Serious ☐ Minor ☐ None
Probable Recurrence Rate: ☐ Frequently ☐ Occasionally ☐ Rarely

Prevention:		
Specific Corrective Measures	Responsible Position/ Parties	Estimated Completion Date

On-Site Field Supervisor _____ Date _____

	Section III Forms & Information	Valid from: November 2008
---	--	---------------------------

Section III – Forms & Information

7.1.1 RPSHSE – 1

Accident/Injury/Near Miss/Incident Investigation Reporting

Form 3 – Vehicle Accident Report



Section III Forms & Information

Valid from: November 2008

Vehicle Accident Report (Page 1)

This Report must be completed and sent to the REPOWER USA HSE Manager within 24 HOURS.

Division:

- | | |
|--|---|
| <input type="checkbox"/> WIND TURBINE | <input type="checkbox"/> CORPORATE |
| <input type="checkbox"/> OPERATIONS | <input type="checkbox"/> ENGINEERING |
| <input type="checkbox"/> WORK MANAGEMENT | <input type="checkbox"/> TECHNICAL SERVICES |
| <input type="checkbox"/> OTHER | |

Name: _____ Driver's Age: _____ Date of Accident: _____

Date of Hire: _____

☐ Company Car No.: _____

☐ Personal Car

☐ Rental/lease vehicle

Type of vehicle: _____

Work Location: _____

Accident Type:

- | | | |
|--|--|--|
| <input type="checkbox"/> HIT OTHER IN REAR | <input type="checkbox"/> INTERSECTION | <input type="checkbox"/> PEDESTRIAN |
| <input type="checkbox"/> HEAD-ON COLLISION | <input type="checkbox"/> BACKING | <input type="checkbox"/> HIT STATIONARY OBJECT |
| <input type="checkbox"/> CUT IN OR OUT-SIDESWIPE | <input type="checkbox"/> LOADING-UNLOADING | <input type="checkbox"/> HIT IN REAR |
| <input type="checkbox"/> PULLED FROM PARKED POSITION | <input type="checkbox"/> CARGO FELL OUT | |
| <input type="checkbox"/> JACKKNIFE | <input type="checkbox"/> UPSET | <input type="checkbox"/> PARKED |
| <input type="checkbox"/> OTHER | | |

Description of Accident (Draw Map of Accident on back, if necessary):



Section III Forms & Information

Valid from: November 2008

Vehicle Accident Report (Page 2)

Description of Accident: _____

NOTE:

The What, When, Where, Why, and How method to describe accident/injury/incident/near miss being investigated.

Accident Judged as: ☐ Avoidable ☐ Unavoidable

Recommended Preventive Action: _____

Driver's Acknowledgement

I have read this report and agree to follow the above suggestions. In the future I will not only operate my vehicle in the safest possible manner but will be prepared to allow for the unsafe actions of other motorists and pedestrians.

Driver's Signature _____ Date _____

On-Site Field Supervisor's Signature _____ Date _____



Section III Forms & Information

Valid from: November 2008

Section I – Forms & Information

7.1.1 RPSHSE – 1

Accident/Injury/Near Miss/Incident Investigation Reporting

Form 4 – Property Damage Report



Section III Forms & Information

Valid from: November 2008

Property Damage Report (Page 1)

This Report must be completed and sent to the REPOWER USA HSE Manager within 24 HOURS.

Division: _____

- | | |
|--|---|
| <input type="checkbox"/> WIND TURBINE | <input type="checkbox"/> CORPORATE |
| <input type="checkbox"/> OPERATIONS | <input type="checkbox"/> ENGINEERING |
| <input type="checkbox"/> WORK MANAGEMENT | <input type="checkbox"/> TECHNICAL SERVICES |
| <input type="checkbox"/> OTHER | |

Customer: _____ Location: _____

Accident Date: _____ Accident Time: _____

All Personnel Involved: _____

Equipment Damaged: _____

Owner/Rented From: _____

Extent of Damage: _____

Cause: _____

NOTE:

The What, When, Where, Why, and How method to describe accident/injury/incident/near miss being investigated.

Estimated Downtime: _____ Estimated Cost to Repair: _____

Description of Accident: _____

NOTE:

The What, When, Where, Why, and How method to describe accident/injury/incident/near miss being investigated.

On-Site Field Superintendent/Supervisor

Date

Representative of Damaged Equipment

Date



Section III Forms & Information

Valid from: November 2008

Section III – Forms & Information

7.1.1 RPSHSE – 1

Accident/Injury/Near Miss/Incident Investigation Reporting

Form 5 – Spill Report Form



Section III Forms & Information

Valid from: November 2008

Spill Report Form (Page 1)

This Report must be completed and sent to the REPOWER USA HSE Manager within 24 HOURS

Location of Spill/Release: _____

Facility: _____

Country/State/County: _____

Landowner(s): _____

Person Completing Spill Report Form: _____

SPILL/RELEASE SPECIFICS

Date and Time of Spill/Release: _____

Substance Spilled/Released: _____

Volume Spilled/Released: _____

Volume Recovered: _____

If a Chemical was released, What is the know chemical's "Reportable Quantity": _____

Cause of Incident: _____

NOTE:

The What, When, Where, Why, and How method to describe accident/injury/incident/near miss being investigated.

Did spill reach water :(rivers, streams, slews, lakes, ditches, etc?) ☐ Yes ☐ No

If Yes: Name of water source: _____

Is slick moving? If so where? _____

Containment and cleanup actions: _____

Type of Waste Generated: _____

Waste Disposition: _____



Section III Forms & Information

Valid from: November 2008

Spill Report Form (Page 2)

Any Immediate Damage Observed to Plants/Animals: _____

Plans To Prevent Reoccurrence: _____

REPORTING RECORD

Person in Charge and Telephone Number: _____

Facility On-Site Field Supervisor: _____

Date/Time Contacted: _____

Person Contacted: _____

Called By Whom: _____

REPOWER USA:

Date/Time Contacted: _____

Person Contacted: _____

Called By Whom: _____

If into Waterways:

National Response Center: 800/424-8802

Date/Time Contacted: _____

Person Contacted: _____

Called By Whom: _____

NRC Report Number: _____

State General Land Office: _____

Date/Time Contacted: _____

Person Contacted: _____

Called By Whom: _____

State GLO Report Number: _____

Comments made by Regulatory Agency: (i.e. written report required, etc.)



Section III Forms & Information

Valid from: November 2008



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Section III – Forms & Information

7.1.1 RPSHSE – 1

Accident/Injury/Near Miss/Incident Investigation Reporting

Form 6 – Accident Report (as applicable for insurance carrier)

THIS FORM LEFT BLANK
FOR INSERTION OF BELOW
ITEM

UTILIZE LOCAL STATE INJURY FORM
TO BE OBTAINED FROM
INSURANCE CARRIER



Section III Forms & Information

Valid from: November 2008

Section III – Forms & Information

7.1.1 RPSHSE – 1

Accident/Injury/Near Miss/Incident Investigation Reporting

Form 7 - Employee Refusal of Medical Attention



Section III Forms & Information

Valid from: November 2008

Employee Refusal of Medical Attention

I have been advised of my right to medical attention due to an injury or potential injury on the job.

I have assisted in filling out the appropriate Accident/Injury/Incident/Near Miss Report and submitted the same to On-Site Field Supervisor and HSE Manager.

With my signature, I hold **REPOWER USA** harmless of any additional sustained injuries resulting from my refusal of medical attention at time of injury.

Acknowledged:

Employee Signature

Employee Social Security Number

Print Name

Date

On-Site Field Supervisor

Date



Section III Forms & Information

Valid from: November 2008

Section III – Forms & Information

7.1.1 RPSHSE – 1

Accident/Injury/Near Miss/Incident Investigation Reporting

Form 8 – Employee Injury Report



Section III Forms & Information

Valid from: November 2008

Employee Injury Report (Page 1)

This Report must be completed and sent to the REPOWER USA HSE Manager within 24 HOURS.

Name of Injured: _____

Social Security Number: _____

Date of Birth: _____ Age: _____ Sex: ☐ Male ☐ Female

Home Address: _____

Telephone Number: Home _____ Work: _____

Job Title: _____

Length of Employment with REPOWER USA:

☐ Less than 3 months

☐ 3 months to 1 year

☐ 1 year to 3 years

☐ 3 years to 5 years

☐ 5 years to 7 years

☐ More than 7 years

Accident Time: _____ Accident Date: _____ Day of the Week: _____

Month/Day/Year that Injured Returned to Work: _____

Activity at the Time of Accident: _____

Describe What Happened: _____

NOTE:

The What, When, Where, Why, and How method to describe accident/injury/incident/near miss being investigated.

Report Prepared By: _____

Title: _____

Date Signed: _____ Date sent to HSE Manager: _____

APPROVED by HS&E MANAGER: _____ Date: _____

Comments: _____

Employee Signature

Date



Section III Forms & Information

Valid from: November 2008



Section III RPSHSE 7.1.2

Valid from: November 2008


Revision Profile

Rev.	Date	Name	Approval Signature	Remarks
0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
0	11/08	Tammy Conekin	On File	ORIGINAL
1				
2				
3				
4				
5				

Original Review Progress

Date	Reviewer	Signature
11/08	J.K. Barrilleaux – Grammar/Technical Format Evergreen QHSSE Solutions LLC	On File
11/08	Owens O'Quinn – QHSSE Consultant Evergreen QHSSE Solutions LLC	On File
11/08	Tammy Conekin – Head of Service	On File



	Section III RPSHSE 7.1.2	Valid from: November 2008
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Section III 7.1.2 RPSHSE - 2
Job Site HSE Inspection (JSSI) Job Safety Analysis (JSA)

Contents

Section	Topic	Page No.
1.0	Introduction	3
2.0	Policy	4
3.0	Procedures	6

1.0 Introduction

7.1.2 RPSHSE - 2 Inspections are a frequently used form of analysis to prevent accidents. It is possible to chart on paper many of the possible things that could go wrong, but in operating systems, inspections must be performed to detect actual faults and failures in equipment plus unsafe activities in the workplace. Inspections are a vital part of preventive and proactive management of accident/incident/near miss prevention.

There are several types of inspections; however the most frequently used are “general” and “detailed”. In general inspections wide ranges of deficiencies are identified. In any particular facility the general inspection may only consist of a walk through that considers a wide range of safety problems.

There are also detailed inspections, which are tailored to all activity and equipment involved. For example, a rigging inspector must be able to identify about twenty (20) different kinds of effects in wire rope, some of which may be very visible, and others may be extremely difficult to identify and require special training and considerable experience.

Scheduled inspections are those required on a regular basis. Examples include:

- Annual Mineral Management Service (MMS) for the Gulf of Mexico Operators.
- **REPOWER USA** HSE Annual & Quarterly Inspections.
- **REPOWER USA** Employees Daily Site Inspections.

These inspections are governed by many aspects, which include legal or regulatory requirements, work cycles, equipment run hours, preventative maintenance schedules and preventive and proactive accident prevention programs.

Specialists may perform unscheduled inspections on random visits. These specialists include **REPOWER USA** Management Personnel, the HSE Manager, Third Party Auditors and Original Equipment Manufacturer (OEM) Representatives. Unscheduled inspections may occur when equipment is brought for maintenance, during Job Hazard Analysis (JHA) or Job Safety Analysis (JSA), process operation changes, and facility reviews.

The goal of every person filling the capacity of Inspector is to identify hazardous and defective conditions. Several strategies are used to cover the inspections. Some apply to the inspection of critical conditions or equipment that may require detailed training and the knowledge and experience necessary to recognize a problem. Some inspections may require the use of special instruments and tools with a properly trained inspector knowledgeable in the use and procedures for them. In other applications, nearly everyone is taught to identify unsafe activities and conditions.

Other inspections are needed by personnel that are not directly involved in performing work on the equipment or in the facility being inspected. This is necessary because people may not see their own mistakes or may be too familiar with the facility or equipment to notice things that are amiss.

Additionally, in some cases two (2) inspectors are necessary to consider the work completed. The individual who has performed the work should be the first inspector and a co-worker, which should be the On-Site Supervisor or specialists. The second inspector may be more knowledgeable and experienced. This double inspection provides redundancy and documented follow-up. Each situation will dictate who is qualified to conduct an inspection.

2.0 Policy

REPOWER USA's policy is to inspect Job Sites with HSE inspections for the following reasons:

- Assist in discovering unsafe conditions.
- Assist in bringing the operation up to accepted and approved safety standards.
- Follow up on previously identified hazards and unsafe activities or conditions.
- To take preventive and proactive approaches to accident/incident/near miss prevention.
- Communicate to **REPOWER USA** Management what hazards exists and what controls been implemented to eliminate or reduce their impact at the facility.

Each specific job site should have a job site inspection form developed to profile the particular equipment and/or operations for that facility. The inspection forms may include daily, weekly, monthly or annual required inspection guidelines by regulatory agencies along with **REPOWER USA** Health, Safety and Environmental Programs.

2.1 Informal Unscheduled Inspections

The **REPOWER USA** On-Site Supervisor, the On-Site HSE Coordinator and employees will do informal inspections on a daily basis. These routine observations should be informal; however, any observed deficiencies should be reported immediately and promptly corrected.

2.2 Formal Scheduled Monthly/ Weekly Inspections

The **REPOWER USA** On-Site Supervisor, On-Site HSE Coordinator, and/or a designated employee should do formal Scheduled Weekly Inspections on a regular basis. Depending on the job site, location, size, etc., these inspections may be weekly or monthly. Report observed deficiencies immediately and institute methods for prompt correction. The **REPOWER USA** On-Site Supervisor will keep an Action File until observed and reported hazards and/or unsafe activities or conditions corrected.

Any noted unsafe activity or condition will result in the “shut-down” of the operation, de-energizing involved machinery, and/or “red-tagging” of the unsafe equipment that presents an imminent threat to employees’ safety, which cannot be corrected.

2.3 Quarterly Inspections

The **REPOWER USA** HSE Manager along with the On-Site Supervisor of the operation or the On-Site HSE Coordinator (as applicable) will perform a quarterly inspection of each location. Each work area will be inspected and all program documentation and previous inspections reviewed. A copy of quarterly inspections will be submitted to **REPOWER USA** Management for review and will become a part of this program’s documentation.

2.4 Annual Inspections

The **REPOWER USA** HSE Manager along with the Department/Head of Service responsible for the operation will perform an annual inspection of each location. Each work area will be inspected and all program documentation and previous inspections reviewed. A copy of this annual inspections will be submitted to **REPOWER USA** Management for review and will become a part of this program’s documentation.

3.0 Procedures

3.1 Formal Weekly Inspections by Facility Personnel

- Make sure all items on the form are checked. If an item is not in compliance identify action taken to correct the unsafe act or condition.
- In the comments or remarks section of the form identify the non-compliance item, reference to the “letter” topic heading and “number” subtopic heading, then detail the item and show corrective action.
- Review the Inspection Report at the Weekly HSE Meeting prior to submitting it to **REPOWER USA** Department/ Head of Service and the HSE Manager.
- Forward a copy of the Inspection Report to **REPOWER USA** Department/ Head of Service and HSE Manager following completion of the report for review and follow up.

3.2 Walk-through Inspection by Facility Personnel

- **Office Area** - Make sure the proper manuals, posters, etc. are present and posted.
- **Storage Areas** - (i.e.: tool storage areas, tool trailers, warehouse areas) Look for items such as the condition of tools, tool guards, assured grounding program, material storage, flammable liquid storage, housekeeping, fire extinguisher, etc.

- **Fuel Storage Area** - Make sure any tanks are in good condition, tied down securely, and grounded properly. The contents must be labeled, no-smoking signs posted, and near a fire extinguisher, etc.
- **Compressed Oxygen and Gas Cylinder Storage** - Check for valve caps, proper separation, and that they properly secured. There should be no-smoking signs posted, fire extinguishers present and good housekeeping.
- **Work Areas** - Observe work areas and look for unsafe acts and unsafe conditions relating to those activities. Also, evaluate items performed to ensure completion in a good, safe manner. Once the inspection is complete, review the items noted with the entire crew at the Weekly HSE Meeting prior to submitting the formal report. Once the formal report is completed, submit a copy to **REPOWER USA** Operation/ Head of Service and the HSE Manager.

3.3 Formal Quarterly Inspections by REPOWER USA HSE Manager

Make sure all items on the form are checked. If an item is not in compliance, note the action taken to correct the unsafe act or condition.

In the comments or remarks section of the form, identify the non-compliance item, make reference to the "letter" topic heading and "number" subtopic heading, then detail the item and show the corrective action taken.

- **Office Area** - Make sure the proper manuals, posters, etc. are present and posted.
- **Storage Areas** - (i.e.: tool storage areas, tool trailers, warehouse areas) Look for items such as the condition of tools, tool guards, assured grounding program, material storage, flammable liquid storage, housekeeping, fire extinguisher, etc.
- **Fuel Storage Area** - Make sure any tanks are in good condition, tied down securely, and grounded properly. The contents must be labeled, no-smoking signs posted, fire extinguishers present, etc.
- **Compressed Oxygen and Gas Cylinder Storage** - Check for valve caps, proper separation, and that they are secured properly. There should be no-smoking signs posted, fire extinguishers present, and good housekeeping.
- **Work Areas** - Observe work areas and look for unsafe acts and unsafe conditions relating to those activities. Also, evaluate items that are satisfactory or that are being performed in an appropriately safe manner.
- Review the Inspection Report with the **REPOWER USA** On-Site Supervisor and, as applicable the On-Site HSE Coordinator prior to submitting it to the Department/ Head of Service.

- A copy of the Inspection Report must also be forwarded to the HSE Committee Members for review prior to next scheduled HSE Committee Meeting.
 - A copy of the completed check list and inspection report **SHALL** be given to the **REPOWER USA** On-Site Supervisor with instructions to correct any non-compliance items, and to reply by a certain date to advise of the corrective action taken.
- 3.4 Formal Quarterly Inspections by REPOWER USA Department/ Head of Service**
Make sure all items on the form are checked. If an item is not in compliance, action must be taken to correct the unsafe act or condition.

In the comments or remarks section of the form, identify the non-compliance item, make reference to the "letter" topic heading and "number" subtopic heading, then detail the item and show the corrective action taken.

- **Office Area** - Make sure the proper manuals, posters, etc. are present and posted.
- **Storage Areas** - (i.e.: tool storage areas, tool trailers, warehouse areas) Look for items such as the condition of tools, tool guards, assured grounding program, material storage, flammable liquid storage, housekeeping, fire extinguisher, etc.
- **Fuel Storage Area** - Make sure any tanks are in good condition, tied down securely, and grounded properly. The contents must be labeled, no-smoking signs posted, fire extinguishers present, etc.
- **Compressed Oxygen and Gas Cylinder Storage** - Check for valve caps, proper separation, and that they are secured properly. There should be no-smoking signs posted, fire extinguishers present, and good housekeeping.
- **Work Areas** - Observe work areas and look for unsafe acts and unsafe conditions relating to those activities. Also, evaluate items that are satisfactory or that are being performed in a good, safe manner.
- Review the Inspection Report with the **REPOWER USA** On-Site Supervisor and, as applicable the On-Site HSE Coordinator prior to submitting it to the Department/ Head of Service.
- A copy of the Inspection Report must also be forwarded to HSE Committee Members for review prior to the next scheduled HSE Committee Meeting
- A copy of the completed check list and inspection report **SHALL** be given to the On-Site Supervisor with instructions to correct any non-compliance items, and to reply by a certain date to advise of the corrective action taken.



Section III Forms & Information

Valid from: November 2008

Section III

7.1.2 RPSHSE – 2

Job Site HSE Inspection (JSSI) Job Safety Analysis (JSA)

Form 1 - Onshore Job Site HS&E Inspection Report Checklist



Section III Forms & Information

Valid from: November 2008

Onshore Job Site HS&E Inspection Report Checklist (Page 1)

On-Site Field Superintendent/ Supervisor:		Department/Operations Manager:		Date of Inspection:					
Department:		Job Location:		Job No:					
NA = Not Applicable	OK= Acceptable	AN= Action Needed	AT= Action Taken						
IAN = Immediate Action Necessary NOTE: This will include all items that are Immediately Dangerous to Life or Health (IDLH) that may require shut down of equipment or facility to prevent any injury or damage to individuals or property.									
NOTE: This checklist is to be used as a reference to assure that all items are addressed during the inspection. Additional checklist should be developed that are job or situation specific and included in this manual for use during the Quarterly and Annual Formal Inspections.									
A.) Recordkeeping 29 CFR 1926.20 – 25				B.) Health & Environment 29 CFR 1926.50 – 57					
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
1. OSHA Poster					1. First Aid Supplies				
2. OSHA 300 Log					2. Posted Emergency Telephone numbers				
3. Injury/Illness Reports					3. Valid First Aid Person				
4. Assured grounding					4. Noise Protection				
5. Weekly HS&E Inspections					5. Dust Protection				
6. Weekly HS&E Meetings					6. Illumination				
7. Employee Orientation					7. Ventilation				
8. Employee Training					8. Housekeeping (General)				
9. Equipment (General)					9. Radiation Exposure				
10. Respirator Training					10. Chemical Hazards				
11. MSDS reviewed at-Site					11. Posted No Smoking Signs				
					12. Eating Areas				



Section III Forms & Information

Valid from: November 2008

Onshore Job Site HS&E Inspection Report Checklist (Page 2)

C.) Personal Protective Equipment (PPE) 29 CFR 1926.100 – 105					D.) Fire Protection & Prevention 29 CFR 1926.150 – 154				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
1. Safety Glasses/Goggles					1. Fire Extinguisher(s)				
2. Hearing Protection					a. Charged & visible				
3. Fall Protection					b. Proper type				
4. Respiratory Protection					c. Current Inspection				
5. Chemical Exposure Protection					d. Proper Quantity (at entire site)				
6. Safety Shoes					2. Posted NO Smoking Signs				
7. Face Protection					3. Flammable Liquid Storage area				
8. Hard Hats					4. Temporary Buildings				
					5. Temporary Heating Devices				
E.) Signs, Signals & Barricades 29 CFR 1926.200 – 202					F.) Material Handling, Storage, Use & Disposal 29 CFR 1926.250 – 305				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
1. Posted Danger Signs					1. Material Stacked & Secured				
2. Assigned Flag Person					Material Properly Stored				
3. Proper Barricades with adequate warnings of hazards in area					2. Inspect all Rigging Equipment: a. slings b. safety devices				
					Material Properly Labeled				
					Material Monitoring System				
G.) Tools & Equipment 29 CFR 1926.300 – 305					H.) Welding, Cutting & Brazing 29 CFR 1926.350 – 353				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
1. Proper Guards Installed					1. Compressed Gas Handling				
2. Pressure Switches					2. Hoses, torches, gauges				
3. Proper Use of Hand tools					3. Flashback Protection				
4. Proper use of Power tools					4. Arc Welding Equipment				
5. Abrasive & grinding tools					5. Ventilation, Hoses & Leads				
6. Condition of Tools					6. Fire Protection				



Section III Forms & Information

Valid from: November 2008

Onshore Job Site HS&E Inspection Report Checklist (Page 3)

I.) Electrical 29 CFR 1926.400 – 404					J.) Ladders 29 CFR 1926.450				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
1. Proper Grounding & Bonding					1. Physical Condition				
2. Electrical Cords					2. Properly Sized & Placed				
3. Ground Fault Interrupter & Assured Grounding					3. Properly Constructed Job Ladders				
4. Proper Battery Use & Storage					4. Proper Ladder Footing placement & tie-down				
5. Proper use of Temporary Power					5. Non-Metal Ladders				
K.) Scaffolding 29 CFR 1926.451					L.) Concrete, Forms & Shoring 29 CFR 1926.700 – 701				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
1. Proper Footing					1. Proper Support				
2. Proper Anchorage & Bracing					2. Stripped Forms				
3. Proper Rails & toe-boards					3. Platforms & Access				
K.) Scaffolding 29 CFR 1926.451					L.) Concrete, Forms & Shoring 29 CFR 1926.700 – 701				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
4. Proper Planking					4. Rebar Protection				
5. Proper Access					5. Guide-rails and Guying				
6. General Condition									
K.) Scaffolding 29 CFR 1926.451					L.) Concrete, Forms & Shoring 29 CFR 1926.700 – 701				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
7. Suspension Scaffolds (if applicable)									
a. Wire Ropes									
b. Fall Protection									



Section III Forms & Information

Valid from: November 2008

Onshore Job Site HS&E Inspection Report Checklist (Page 4)

M.) Floor/wall Openings & Stairways 29 CFR 1926.500					N.) Excavation, Trenching & Shoring 29 CFR 1926.650 – 652				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
1. Guardrails & Toe-boards					1. Angle & Repose of Sloping				
2. Properly Secured Hold Covers					2. Spoil & Material Storage				
3. Handrails					3. Support & Shoring System				
4. Proper Sharp Edge Protection					4. Access & Egress				
					5. Digging Permit				
					6. Barricade, Signs & Isolation of Area				
O.) Motor Vehicles 29 CFR 1926.601					P.) Cranes, Hoist & Aerial Lifts 29 CFR 1926.550				
Item	NA	OK	AN or IAN	AT	Item	NA	OK	AN or IAN	AT
1. Seatbelts & Rollover Protection					1. Posted Load Capacity				
2. As Applicable Flagman					2. Legible Boom Angle				
3. Properly Installed Backup Alarms									

NOTES & SUMMARY

Date: _____

Location: _____

Inspector:_____

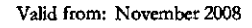
Reason for Inspection: _____

Comments:

{Reference area by identification number on checklist}

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins or other markings on the paper.

Page No. _____





Section III
Forms & Information

Valid from: November 2008

Section III

7.1.2 RPSHSE – 2

Job Site HSE Inspection (JSSI) Job Safety Analysis (JSA)

Form 2 - HSE Concern Action Tracking Chart

HS&E Concern Action Tracking Chart

[illegible]

Section III

7.1.2 RPSHSE - 2

Job Site HSE Inspection (JSSI) Job Safety Analysis (JSA)

Form 3 – HSE Concern Report Form

HSE Concern Report Form

Date of HSE Concern Report: _____

Location: _____

Submitted to:

On-Site Field Supervisor: _____ On-Site HSE Coordinator: _____

Head of Service/Operations Manager: _____ HSE Manager: _____

Date Submitted to above REPOWER USA Personnel: _____

Summary of HSE Concern:

Was an accident/incident/near miss reported for this HSE Concern: Yes: _____ No: _____

Equipment involved: _____

Type of Operations involved: _____

Recommended Solution of HS&E Concern: _____

Date received by:

On-Site Field Supervisor: _____ On-Site HSE Coordinator: _____

Head of Service/Operations Manager: _____ HSE Manager: _____

Immediate action taken: _____

Date entered on Tracking Chart Form: _____

Designated responsible person(s) for investigation: _____

Date of Investigation: _____

Final action after investigation: _____

Date final action reported to location of HSE Concern submittal: _____

Closure Date: _____



Section III RPSHSE 7.1.3

Valid from: November 2008

Revision Profile

Rev.	Date	Name	Approval Signature	Remarks
0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
0	11/08	Tammy Conekin	On File	ORIGINAL
1				
2				
3				
4				
5				

Original Review Progress

Date	Reviewer	Signature
11/08	J.K. Barrilleaux – Grammar/Technical Format Evergreen QHSSE Solutions LLC	On File
11/08	Owens O'Quinn – QHSSE Consultant Evergreen QHSSE Solutions LLC	On File
11/08	Tammy Conekin – Head of Service	On File



Section III 7.1.3 RPSHSE – 3
General Office & Warehouse HS&E**Contents**

Section	Topic	Page No.
1.0	Introduction	3
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1.0 Introduction

7.1.3 RPSHSE – 3 clarifies the misconception many people have about office injuries; they believe that they are non-existent. However, this is a serious mistake. Complacency, believing office accidents are unimportant, and/or not paying attention and hurrying are the primary causes of office accidents. Office and warehouse injuries may seem inconsequential because they often lack dramatic impact however, not giving these injuries the proper attention may result in infections and lost time for the injured employee. Injuries in the home and the office can be controlled by using the following precautions listed and by each individual being committed to safe behavior.

This standard covers precautions for controlling and reducing exposure to these hazards.

Examples of Office Incidents

- Slips, trips, and falls on the same level or from elevations
- Lifting or moving heavy or bulky objects
- Repetitive or awkward movements
- Falling objects or encounters with fixed or moving objects
- Caught in or between, abrasions
- Eye strain or muscle aches
- Stress
- Security and Safety
- People Problems

2.0 HSE Procedures

- Keep current emergency phone numbers for police, fire, and medical aid near the telephones, on bulletin boards, and at the receptionist area.
- Become familiar with all exits. An evacuation plan should include both primary and secondary escape routes.
- Know where first aid kits are located. Know who has been trained in first aid and cardiopulmonary resuscitation (CPR) procedures and where these people are located.

3.0 Emergency Procedures in Case of Fire

From chemical emergencies to fires and natural disasters like tornadoes, you need to know the best response for when something goes wrong. Your employer develops a plan to deal with such emergencies.

To do your part

- Know how to report a fire. Know and follow the Fire Prevention procedures in **REPOWER USA HSE and Training Manual**.
- Know the location and operating methods of all fire fighting equipment in the building.

- Know which type of extinguisher is effective on wood, paper, oil, grease and electrical fires.
- Be familiar with survival techniques in case you are trapped by fire.
- If caught in a smoke filled area, stoops over at the level of the light switch and take short breaths through your nose. If possible, hold a cloth in front of your face. **Note:** Heavy gases are heavier than air and will be floor-level.
- Before opening a door, touch it to check its temperature. If it is hot, **DO NOT** open it.
- During fire alarms, make quick last minute searches of your area to ensure all personnel are evacuating. Clear the area quickly and aid others if requested. Leave your area immediately. Close the door on your way out.
- During evacuations, stay calm and move rapidly. Follow the nearest exit signs. Remove high heels to avoid falling down stairs and slipping on floors.
- All employees are responsible for visitor orientation and evacuation.

4.0 Office Equipment and Furniture

4.1 File Cabinets

- **Do Not** open a file drawer if someone is working underneath.
- Whenever possible, arrange filing cabinets side by side and bolt together.
- **Do Not** overload the upper drawers. Only open one drawer at a time, never leave an open drawer unattended.
- **Do Not** place cabinets and files so that opening drawers block passageways.
- **Do Not** stack separate two-drawer filing cabinets unless they are designed for such use and can be fastened together.
- **Do Not** stack bookcases or file cabinets on top of tables or desks.
- **Remember**, large files and bookcases should be bolted to the wall, particularly in file rooms and libraries.
- **Do Not** attempt to move heavy files cabinets without assistance.

4.2 Office Furniture

- Properly position a chair before sitting down, and once seated, keep at least one foot and all chair legs on the floor at all times.
- **Do Not** scoot across the floor while sitting in a chair and do not lean sideways from a chair to pick up an object.
- Placing your feet on a desk or table while sitting in a chair can cause a painful and serious injury if your fall. This is particularly hazardous if the chair has casters.
- Always use an approved ladder or stool to reach articles above eye level.
- Avoid storing heavy objects above eye level.
- Broken glass tops on desks must be removed as soon as possible.

4.3 Office Supplies and Equipment

- Use staplers, paper cutters, pencils, knives, and scissors with care; they can produce serious cuts or wounds.
- A paper edge is capable of inflicting a painful cut. Avoid cuts by picking up an individual sheet of paper at the corner, not at the side. When sealing envelopes, use a damp sponge or commercial moisteners.
- Handle a sharpened pencil as carefully as you would an open knife or an ice pick. **Do Not** place sharpened pencils or other pointed objects upright in a container or upright in a pocket of your clothing.
- Pass scissors handle first, blades together, and keep them where they cannot fall.
- Keep items such as paper clips, thumbtacks, rubber bands, pencils, and the like off the floor where they are a slipping hazard.
- Secure paper cutter blades in the down position when not in use.
- Store X-Acto knives, thumb tacks, and other sharp objects in the proper containers or with the blades and points covered or shielded. Secure sharp edges before disposing of these items.

5.0 Housekeeping

Every year, nearly half a million people are injured when they slip, trip or fall at work. (Reference 7.1.18 RPSHSE – 18 Fall Protection and 7.1.19 RPSHSE – 19 Aerial Work)

5.1 To prevent slips

- Clean up spills immediately.
- Barricade wet areas until they are dry.

5.2 To prevent trips

- Keep pathways and work areas clean and free of clutter, including purses and boxes.
- Watch for and fix loose rugs and uneven flooring.
- Eliminate snaking extension cords and cables.

5.3 To prevent falls

- **Do Not** use makeshift climbing devices like boxes, shelves or chairs.
- Get a step stool or ladder to reach anything above shoulder level.
- Inspect the ladder or step stool before you use it.

5.4 General precautions

- Keep all passageways, entryways, aisles, storerooms, service rooms and work areas clean, orderly, sanitary and well maintained, with no obstructions.
- Aisles and hallways shall provide unobstructed movement and immediate access to emergency exits and to fire protection equipment.
- Properly stack material/boxes to avoid creating a hazard.

- Keep food, drink and excessive combustible materials away from electrical equipment, computers, and workstations of PC's. Damage to circuitry or destructive fires may result.
- **Do Not** throw glass, cans with rough edges, or similar objects in a wastepaper basket. **Do Not** use a wastepaper basket as an ashtray.
- Sharp burrs on metal furniture and splintered edges on wooden furniture should be eliminated by repair or replacement.

6.0 Electrical Equipment

Electrical equipment can pose a hazard if not inspected regularly and used properly.

- Use of extension cords should be minimized and arranged to avoid tripping hazards and electrical overload.
- **Do Not** pull an electrical cord to shut off power to any equipment.
- Disconnect (unplug) the power source before trying to remove jammed materials from a machine.
- Installation or repair of any electrical equipment shall be done by qualified workers using only approved materials.
- Office machines with moving parts, high temperature hazards, and electrical shock potential shall not be operated without the proper safeguards in place.
- Keep electric and telephone or PC cords off the floor and out of aisles. Cords with worn or exposed wires shall be replaced.
- Furniture should always be arranged to avoid contact with heaters.
- Electrical outlets must not be overloaded. Use caution with portable electric heaters.
- Extreme caution should be taken with paper shredders. Keep dangling ties, jewelry, and loose clothing away from the machines by standing to the side. Never try to un-jam a shredder unless the power is turned off.

7.0 Flammable and Hazardous Materials

7.1 To prevent fires

- Keep flammable or combustible material and residue in a building or operating area to a minimum. Store these in metal safety cans or storage cabinets that meet Underwriter's Laboratories, Inc. or Factory approval. Do not leave containers uncapped.
- Keep all flammable materials away from ignition sources.
- **Do Not** use aerosol sprays, cleaners, or insect repellent near ignition sources.
- Keep portable electric heaters away from furniture and other flammable materials. **Do Not** block forced-air heater outlets.

7.2 To protect yourself if a fire occurs

- Keep equipment and furniture away from exits and never lock or block exit doors.
- Learn the emergency exit routes in advance so you can get out quickly.
- At the first sign of a fire, call 911 and/or activate the appropriate Emergency Response Plan (ERP).
- Use the nearest extinguisher to put out a small fire if you have been trained to do so.
- If the fire is large, leave the area immediately by the closest evacuation route.
- Activate the fire alarm as you leave or report the fire from a safe place.
- Report to your predetermined assembly point.

8.0 Engineering/Ergonomics**8.1 Workstations**

Keeping your workstation safe and comfortable is an excellent way to prevent injuries at work. Proper work area arrangement makes your work easier and reduces the risk of injuries

- Each workstation should be arranged to meet specific individual needs. Select the proper chair, adjust the chair's height, organize the desk, position the video monitor, and position the keyboard to suit the individual.
- When working at a PC for long hours, periodically change position, stand up and stretch to relieve muscle tension and eyestrain.
- Lighting should be installed or positioned to minimize direct or reflected glare or harsh shadows and to counteract potential stress and eye fatigue in PC users.

8.2 Musculoskeletal Disorders

Musculoskeletal disorders occur when you strain your body beyond safe limits or do the same thing repeatedly without giving your body time to rest.

Musculoskeletal disorders can occur at work or at play but all begin with physical stress on:

- Muscles
- Ligaments
- Nerves
- Tendons
- Cartilage
- Joints
- Spinal discs

The most common causes are:

- Awkward postures
- Repetitive motion

- Improper lifting
- Contact stress
- Extreme force
- Vibration

8.3 Prevention

The best way to prevent musculoskeletal disorders is to change the way you work to remove undue stress on your body.

- Learn to recognize and avoid awkward postures and positions.
- Arrange your work and your workstation so you keep your muscles relaxed.
- Move the work to you instead of moving your body to the work.
- Try to keep your work close to your body and near waist level.
- Keep commonly used items within easy reach.

8.4 Keyboard

If you use a keyboard

- Position it so your arms hang comfortably from your shoulders and close to your sides.
- Bend your arms at the elbow at a comfortable angle.
- Keep your hands in a straight line with your forearms so you do not bend your wrists.
- Use a keyboard tray long enough to use your mouse on it.
- Use a document holder to help you sit in a neutral position.

8.5 Video Display Terminal

If you work at a VDT

- Set the top of the screen at or just below eye level when you are sitting up straight.
- **Do Not** hunch over or tilt your head to avoid glare.
- Close blinds or change lighting to reduce glare.
- Your office area should be about as bright as your monitor screen.

8.6 Chair

You should adjust your chair

- To let you reach your work without hunching forward or pulling your shoulders up.
- So the seat height keeps your thighs parallel to the floor and your feet flat on the floor.
- To support your lower-back and keep its natural curve.

8.7 Planning

Protect your body from stress and injuries by reducing reaching, lifting and material moving.

If you find you perform the same task repeatedly, decide whether you can make it easier or cut down on how often the task is repeated.

8.8 Body Awareness

Do regular body checks to monitor for body position and muscle stress. Try to vary your tasks to give your muscles a chance to rest.

If your muscles tighten up, or if you feel stiff, take a quick break:

- Stretch and move the tight muscles in the opposite direction.
- Drop your shoulders down and back.
- Roll and refocus your eyes.
- Take a few deep belly breaths.

9.0 Doors and Walkways

- Observe these precautions with doors:
 - Open doors into offices and hallways carefully; something or someone may be on the other side.
 - Approach blind corners with caution, especially near coffee rooms and reproduction rooms.
 - Approach doors that open toward you from the side, so that you will not be in the path of the door's swing if it should be opened unexpectedly.
 - **Do Not** stand in front of a door that opens toward you.
- Caution should be exercised when wearing high heels and/or hard heels in the office.
- Remove any type of spilled liquid from the floor immediately.
- Tack down loose carpeting or flooring.
- Be extremely careful entering buildings on wet/rainy days. Wipe your shoes dry on floor mats before walking on waxed floors. When office-building floors are waxed, a non-skid wax should be used. Check for raised or unsecured floor tiles to prevent tripping hazards.
- Use handrails on stairs. Never run on stairs and always keep one hand free.
- Approach blind corners with caution, especially near coffee rooms and reproduction rooms.

10.0 Lifting Techniques

When material must be carried, use proper lifting and carrying techniques. Improper lifting techniques may cause back strains and injuries, even if the object was not too heavy.

10.1 The key to safe and easy lifting

- Face the object squarely and get as close to it as you can.
- Balance yourself solidly, with one foot slightly in front of the other.
- Squat down, bending your knees. Keep your back straight and as nearly upright as possible.
- Grip the object firmly.

- Take a breath and hold it. Tighten your abdomen.
- Keeping your back straight, use your legs to bring you to a standing position.
- Make the lift smoothly and under control.
- When carrying an object, grip it firmly and hold it as close to your body as possible.
- Use a safe technique for setting the load down.
 - Keep your back straight.
 - Tighten your abdomen.
 - Bend at the knees.
 - Whenever possible, store heavy loads off the floor.

10.2 Special Dangers

- **Do Not** lift objects over your head.
- **Do Not** twist your body when lifting or setting an object down.
- **Do Not** reach over an obstacle to lift a load. Move whatever is in your way or go around it.
- Pace yourself to avoid fatigue when doing heavy work for a long period.

Office personnel going to field locations should be aware of the training and Personal Protective Equipment (PPE) that will be required for their visit and ensure they bring the equipment with them or arrange for the field to furnish the equipment before they arrive. Contact the On-Site Field Superintendent/Supervisor for specific requirements.

11.0 Warehouse HS&E

- Warehouses must have signs posted denoting “**SMOKING AREA**” and “**NON-SMOKING AREA**”.
- All storage areas must be kept free of materials that can cause tripping, fire, explosions, or pest infestation. Aisles, walkways, stairs, and loading platforms must be kept free of such materials.
- Gasoline and other volatile materials must not be stored in a warehouse. Appropriate outside storage should be provided.
- Large quantities of paint and thinners must also be stored outdoors in approved lockers and labeled for identification.
- Allowable floor or platform loadings must be determined by authorized professional personnel and posted. **Do Not** exceed the OSHA safe loading limit requirements.
- A nonskid surface should be provided on ramps and walkways where there is danger of slipping.
- **Do Not** overload shelves. Inspect shelves for strength.
- Bins and racks should be spaced to allow safe access to material.

12.0 Stress/Security/Safety

Working in an office is similar to being in the jungle. The dangers are hidden and subtle. You have to be on your guard every minute and ready to take action before you get hurt

12.1 Stress

Some general rules can help you deal with stress before it affects your work and your behavior.

- Work with your employer to make your workstation and tasks as comfortable as possible.
 - Get organized – keep a list of tasks and check them off as you finish.
 - Take breaks – stretch and change your position regularly.
 - Relax your body – take deep belly breaths while you drop your shoulders and relax all your muscles.
 - Keep a relaxed and positive outlook – replace negative thoughts with positive ones.
- Before you worry, ask yourself if the outcome is important and if the worrying will help.

12.2 Security and Safety

In every office, much can be done to improve security and safety within your area of responsibilities.

- Lock up your valuables or carry them with you.
- Mark personal items with your name or initials.
- Report all suspicious activities and situations.
- Report conditions that are safety hazards.
- Work in pairs.
- Use the buddy system when going to the restrooms, are in stairways, and in the parking lots.
- Park in well-lit areas.
- Never enter an elevator or other secluded areas with someone who looks out of place or is behaving strangely.

12.3 People Problems

Behavioral changes in fellow employees could signify a serious problem.

- Depression, angry outbursts and threats should be taken seriously and reported immediately.
- **Do Not** confront anyone who is behaving in an angry or threatening manner. Stay calm and speak softly and reassuringly as you leave the area.
- Trust your instincts. If a situation makes you uncomfortable, go to a safe location and immediately report your observations.
- When disputes or problems arise, address the problem or behavior, not the person.



Section III Forms & Information

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Section III

7.1.3 RPSHSE – 3

General Office & Warehouse HSE

NO FORMS APPLICABLE

LEFT BLANK FOR FUTURE
INSERTATION AS
APPLICABLE

TRAINING WILL ADDRESS THIS GROUP

Section III
RPSHSE 7.1.4
Classification/Rating of Fires and Extinguishers

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Section III RPSHSE 7.1.4

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Section III

7.1.4 RPSHSE – 4

Classification/Rating of Fires and Extinguishers

Contents

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1.0 Introduction

Fire extinguishers, as well as other equipment are provided for use on fires in the beginning (incipient) stage. Fires in this initial stage can be controlled or extinguished by portable fire extinguishers, without protective clothing or breathing apparatus. Any other fires should never be fought by employees but by the professional fire fighters of local fire departments. Should a fire or other emergency occur, employees should take appropriate steps to implement emergency action and/or evacuation procedures.

2.0 Fire Classification

The following classification system has been established to express the relative fire extinguishing capabilities of portable fire extinguishers.

Fires are usually divided into four basic types:

2.1 Class "A" Fires

Fires involving ordinary combustible materials (such as wood, cloth, rubber, and many plastics) and require the heat absorbing (cooling) effects of water, water solutions, or the coating effects of certain dry chemicals that retard combustion.

2.2 Class "B" Fires

Fires involving flammable or combustible liquids or flammable gases, and are readily extinguished by excluding air (oxygen), or inhibiting the release of combustible vapors, or interrupting the combustion chain reaction.

2.3 Class "C" Fires

Fires involving energized electrical equipment where safety to the operator requires the use of electrically nonconductive extinguishing agents.

Note: When electrical equipment is de-energized, the use of Class A or B extinguishers may be indicated.

2.4 Class "D" Fires

Fires involving certain combustible metals, (magnesium, titanium, zirconium, sodium, potassium, etc.) that require a heat absorbing extinguishing medium that does not reactive with the burning metals.

3.0 Fire Extinguisher Rating

On the basis of the preceding classification of fires and the physical testing of fire extinguishers by Underwriters Laboratories, Inc., (UL) ratings have been established for portable fire extinguishers.

These ratings consist of a **NUMERAL**, a **LETTER**, or combinations thereof. They appear on the labels affixed to the extinguishers listed by UL.

These **NUMERALS** and **LETTERS** indicate the following:

- 3.1 In the case of extinguishers suitable for use on Class A fires, the **NUMERAL** indicates the approximate relative fire extinguishing capabilities of various sizes of the suitable extinguishers available. For example, a 4-A extinguisher can be expected to extinguish approximately twice as much fire as a 2-A extinguisher.
- 3.2 In the case of extinguishers suitable for use on Class B fires, the **NUMERAL** also indicates the approximate relative fire extinguishing capabilities of various sizes of the suitable extinguishers available. In addition, the **NUMERAL** is an approximate indication of the square foot area of deep-layer flammable liquid fire that an average operator can extinguish. For example a 10-B unit can be expected to extinguish 10 square feet of deep-layer flammable-liquid fire when used by an average operator.
- 3.3 In the case of extinguishers suitable for use on Class C fires, no **NUMERAL** is used. Class C fires are essentially either Class A or B fires involving energized electrical wiring and equipment. The size of the different suitable extinguishers installed should be commensurate with the size and the extent of the area involving the electrical hazard or containing equipment being protected.
- 3.4 The **LETTERS** refer to the classes of fire on which the use of the particular extinguisher is most effective.

• Examples

- Foam extinguisher, rated 2-A, 5-B: This extinguisher should extinguish approximately twice as much Class A fire as a 1-A extinguisher and five times as much Class B fire as a 1-B extinguisher. Also, this extinguisher should extinguish a fire in a deep-layer flammable-liquid, such as in a drip pan having a surface area of 5 square feet, when used by an average operator.
- Dry chemical extinguisher, rated 10-B, C: This extinguisher should extinguish approximately ten times as much Class B fire as a 1-B unit and should successfully extinguish a deep-layer flammable-liquid fire with an area of 10 square feet when used by an average operator. It also is safe to use on fires involving energized electrical equipment.
- A Multipurpose extinguisher, rated 4-A, 20-B, C: This extinguisher should extinguish approximately four times as much Class A fire as a 1-A extinguisher, 20 times as much Class B fire as a 1-B extinguisher and a deep-layer flammable-liquid fire with an area of 20 square feet when used by an average operator. It is also safe to use on fires involving energized electrical equipment.
- Water type extinguishers are recommended for Class A fires only. Chemical extinguishers are recommended for Class A, B, and C fires. CO₂ and Halon extinguishers are recommended for Class A, B, and C fires but are primarily used for Class C fires. Dry chemical extinguishers are used on a Class D fire but require special powder for some types of metals.

4.0 Definitions

- 4.1 **Combustible Liquid** – liquids with flash points at or above 100 °F. Although they are not as readily ignitable as flammable liquids, they can be ignited under certain conditions and must be handled with caution.
- 4.2 **Fire Point** – the lowest temperature at which the vapor-air mixture will continue to burn after it is ignited. This is generally a few degrees above the flash point.
- 4.3 **Fire Triangle** – flammable liquids are always covered with a layer of vapors. When mixed with air and when in contact with an ignition source, it is the vapor, not the liquid, which burns. A flammable liquid is usually more dangerous when temperatures are high because more vapors are generated.

Four components are necessary to start and sustain a fire, commonly known as the fire triangle:

Air + Heat + Fuel + Sustainable Combustion = FIRE

The most important factors in fire prevention is the containment of the fuel and the isolation of ignition sources from that fuel.

- 4.4 **Flammable Liquids**
- **LEL = Lower Explosive Limit** – the minimum concentration of vapor in the air below which the propagation of flame does not occur on contact with ignition source.
 - **UEL = Upper Explosive Limit** – the maximum concentration of vapor in the air above which the propagation of flame does not occur on contact with ignition source.
- 4.5 **Flammable Liquids** – liquids with flash point below 100° F. Since this group of liquids can generate ignitable vapor concentrations at or below ordinary room or atmospheric temperatures, they must be handled and stored with extreme caution.
- 4.6 **Flash Point** – the lowest temperature at which a liquid gives off enough vapors to form a flammable mixture with air.
- 4.7 **Volatility** – the tendency or ability of a liquid to vaporize. Examples are ethanol and gasoline, which evaporate rapidly.

Source: NFPA-10,
Standard for Installation of Portable Fire Extinguishers



Section III RPSHSE 7.1.4A

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**Section III 7.1.4 A RPSHSE – 4 A
Fire Prevention****Contents**

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1.0 Introduction

Our daily fieldwork involves the handling, transporting, and/or dealing with volumes of flammable liquids. Extraordinary measures to prevent any possibility of fire are called for on the part of all employees.

Fire extinguishers, as well as other equipment are provided for the use on fires in the beginning (incipient) stage. Fires in this initial stage can be controlled or extinguished by portable fire extinguishers without protective clothing or breathing apparatus. Any other fires should never be fought by employees but by the professional fire fighters of local fire departments. Should a fire or other emergency occur, employees should take appropriate steps to implement emergency action and/or evacuation procedures.

2.0 Emergency Preparedness

Each location should arrange an annual visit with the local fire department(s) and/or emergency response organizations to:

- Identify emergency contact personnel and points of contact (including 800 numbers)
- Discuss emergency response procedures
- Tour facilities and explaining operations and products handled
- Discuss equipment and personnel availability

3.0 General Rules

- All accidental fires on **REPOWER USA** property, no matter how small, must be reported immediately to HSE Department. The formal report should include all known or reasonably surmised details as an additional report may be required by governmental agencies.
- The prevention of fires is of utmost importance. Good housekeeping and equipment maintenance must be followed to keep fire hazards at a minimum.
- Furniture should be arranged to avoid contact with heaters.
- Matches and cigarette lighters should not be carried into any area that may have an explosive atmosphere. In operating areas with non-explosive atmospheres, only safety matches and approved double-action cigarette lighters may be carried.
- **Smoking** in operating areas is prohibited except where specifically designated by management. Smoking is prohibited on the floors of platforms and rigs, next to oil and gas wells, or in any area suspected of containing flammable vapors, whether a "No Smoking" sign is displayed or not.
 - Any area subject to contamination by flammable liquids or gases should be designated a "No Smoking" area by local management. "No Smoking" signs should be displayed in the area.
 - Attics of all buildings and warehouse areas must be designated as "No Smoking" areas and "No Smoking" signs must be prominently displayed there.

- Cans of oil and kerosene, oily rags, waste, and debris must not be allowed near stoves, furnaces, or gas fires.
- Oily waste or oil-soaked clothing must be disposed of because of the possibility of spontaneous combustion. To prevent such fires, approved metal containers must be provided for the disposal of oily rags, waste, and other flammable rubbish. These containers must be emptied often enough to keep the premises in a safe, sanitary condition.
- Buildings in which gas or petroleum products are being handled must be well ventilated. Control rooms containing a positive pressure air system must be equipped with a visible or audible alarm to detect the failure of the positive pressure air system.
- Before an open flame such as a welding torch is carried into a closed building or tank, a test should be made to detect the presence of gas, using an approved combustible-gas indicator.
- Due to the probability of electrostatic charge generation, carbon dioxide (CO₂) must not be injected into any space containing a flammable atmosphere that is not on fire.
- When high gravity/high vapor pressure hydrocarbon liquids, such as condensates, gasoline, and some crude oils, are drawn into open containers, a metal container must be used and the open container must be properly bonded or grounded.

Bonding can be achieved by hanging the bare metal handle of the metal container (no wood, rubber, or plastic cover on the handle) over the valve from which the fluid is being drawn. It can also be achieved by setting the metal container down on a steel plate or steel deck definitely known to be in contact with the vessel from which fluid is being drawn.

Bonding can also be accomplished by threaded connections or by connecting a metal cable from the container to the outlet piping or the container from which the fluid is being drawn. If not bonded together, each object must be separately grounded. A cable of stranded wires, rather than a single solid wire, should be employed for cables that are to be connected and disconnected frequently. Terminals should be properly secured to prevent accidental disconnections.

- High gravity/high vapor pressure hydrocarbon liquids must not be drawn into open plastic or rubber containers. These types of buckets or pails can build up an electrostatic charge and they cannot be properly bonded or grounded because of the possible non-conductivity or the high resistance composition of this material.
- Because personnel can be electrostatically charged enough to cause an incendiary spark, hands must not be placed in or under the stream being drawn into the container.
 - Before the valve is opened, human bonding can be accomplished by skin contact with the valve or vessel from which the fluid is being drawn.
- The use of gasoline as a cleaning agent is prohibited. The only flammable liquids approved for use in cleaning machinery are kerosene and varsol.

These liquids should not be used on hot metal surfaces or sprayed around operating machinery where there is a source of ignition. Hydrocarbon resistant rubber gloves should be worn to protect the hands.

- Gasoline, kerosene, or other flammable liquids must not be stored in glass containers or unapproved plastic containers. Only approved safety cans may be used to store or transport gasoline or solvents.
- Unless authorized, individuals must not draw liquid from a high pressure, field separator bleeder line to an open vessel.
- Oil and gasoline from leaks should not be burned. This leakage should be cleaned up and disposed of in a prescribed manner.
- Lines containing hydrocarbons or combustible materials under pressure must not be heated by open flame to remove ice or paraffin plugs.
- All flammable hydrocarbon leaks should be reported and repaired immediately, if possible. If immediate repair is not possible, adequate warning signs must be posted and extra precautions against fires instituted.
- In the event of a severe gasoline or gas leak in the plant yard, all fires and engines should be shut down without delay.
- When testing for gas leaks on domestic gas connections, use soapsuds or an approved leak-detector. Never use an open flame.
- Because paint, insect sprays, aerosol sprays, and most paint removers are usually flammable, they should not be used near open flames or other sources of ignition. Read the labels on the containers.
- Fire drills shall be held at regular intervals to familiarize personnel with the location and operation of fire extinguishing equipment.
- Fire fighting equipment is for the use of fire extinguishing only and must be kept in its designated place at all times when not in use.
- All fire protection equipment must be located in the designated areas that are clearly identified with the appropriate markings. This equipment should be located near likely fire hazards, but it must also be accessible to operating personnel. The number, type, and location of the extinguishers must meet the latest National Fire Protection Agency (NFPA) or other applicable standards.
- Partially used fire extinguishers must be discharged of pressure, recharged, or replaced immediately.
- Fire extinguishers should be kept filled and maintained according to the manufacturer's instructions to ensure operation at top efficiency the instant they are used. An empty, used or defective fire extinguisher must be taken out of service.
- All fire extinguisher hose nozzles should be kept free of obstructions at all times. In areas where insects tend to nest in protected small areas the nozzle should be protected to prevent plugging.

- All employees should be instructed in the proper use of available fire fighting equipment. If a place requires special precautions against fire employees at that location must be instructed in those precautions. **REPOWER USA** employees will act **ONLY** in regards to incipient stage fires which will require the use of appropriate fire extinguishers. Training for appropriate fire extinguisher usage is completed and documented in each **REPOWER USA** Training Profile with appropriate documentation to ensure that a sufficient level of competence has been demonstrated. Each **REPOWER USA** employee shall receive training prior to being assigned to a specific site and complete a refresher annually there after.

The basic instruction is to direct the flow from an extinguisher toward the source of the flame in order to shut out oxygen. Instructions on the extinguisher labels should be observed.

- Welding on the outer shell of a fire extinguisher is prohibited unless done by an American Society of Mechanical Engineers (ASME) coded welder.
- All fire hoses and hose reels should be inspected at least once every 12 months or more frequently if subjected to unusual exposure or use.
- Instruction labels on fire extinguishers should be protected.
- Firewater systems should have a primary and secondary power source. They should be remotely located from potential fire hazard areas. These facilities should be started and operated weekly and all personnel should be familiar with the starting and operating procedures.
- Personnel assigned to locations where automatic extinguishing systems are employed should be instructed to vacate enclosed buildings in the event of an extinguisher discharging to prevent excessive inhalation of the chemical.
- In buildings equipped with an automatic fire protection system (i.e., Halon) all doors must remain closed except when persons enter or leave the building. The automatic louver closure and exhaust fan shut-down system must be operable.
- Adapters should be available to connect city fire equipment to existing equipment when possible.
- All assigned **REPOWER USA** vehicles should be equipped with an approved fire extinguisher. The size of the extinguisher should be determined by the anticipated need.
- Sock type filters that have been exposed to gas having any sulfur content should be disposed of immediately.
- The burning of waste oil, grass, brush, rubbish, or other combustible material is prohibited without supervisory authorization and the required permits.
- Extreme care should be used to prevent accidentally starting a fire when working in dry woods, brush, marshes, and prairies. A fire extinguisher or an appropriate water source should be available.

4.0 Inspections – Fire Extinguishers

A Competent Inspector (CI), in accordance with all applicable regulatory and **REPOWER USA** requirements, must perform the inspection and maintenance of all fire equipment. Records of the inspection and maintenance should be maintained.

The following general guidelines should be observed:

- All portable and semi-portable extinguishers must be inspected monthly to ensure that they are in their designated places, that they have not been tampered with, and to detect any obvious physical damage, corrosion, or other impairments.
 - A more thorough inspection should be performed every six months or yearly as conditions dictate. Extinguishers should be recharged as needed, repaired to ensure reliable operation, and replaced as needed. The following guidelines on thorough inspections are recommended:
- Inside air-conditioned buildings - once a year.
- In open buildings or outside - every six months.
 - Each extinguisher must have a durable tag securely attached to show the maintenance or recharge date.
 - Extinguishers removed from the premises to be recharged must be replaced with spare extinguishers.
- Hydrostatic testing at 75 % of factory test pressures must be conducted if a portable extinguisher shows evidence of corrosion, deterioration, or mechanical damage. Fire extinguisher hoses that have a shut off nozzle at the discharge end must be included in the hydrostatic test. Also, hydrostatic tests must be conducted at the following intervals:
 - Carbon dioxide extinguisher **5 years**
 - Dry chemical units with stainless steel, aluminum, or soldered brass shells **5 years**
 - Cartridge dry chemical units with brazed-brass or mild-steel shells such as Ansul or General, located in or around a saltwater environment or any other corrosive condition
 - 6 years**
 - Pressurized dry chemical units with brazed-brass or mild-steel shells **12 years**
 - All others **12 years**
- Sprinkler systems must be kept in good operating condition.
- The following precautions apply to fixed dry chemical, Halon, and carbon dioxide extinguishing systems.
 - Expellant gas containers must be inspected and checked for pressure and weight against the required minimums, semi-annually.
 - The complete system, including alarms, shutdowns, and other associated equipment, must be thoroughly inspected and checked for proper operation by a qualified inspector annually, at the least.
 - Dry chemical containers must be sampled annually from the top, at the center and near the wall of the container to determine the existence of packing or deterioration.

- Records of inspections and tests must be maintained. The preventive maintenance report, or a similar form, is typically used for this purpose. The report should be reviewed monthly to ensure that all inspections are being made and that defective equipment is being promptly repaired or replaced.
- The pressure testing requirements for Halon, nitrogen, and carbon dioxide cylinders are as follows:
 - Cylinders sent in for recharging must be hydrostatically tested if more than five years has elapsed since the last test.
 - Cylinders continuously in service without discharging must be pressure tested every 12 years. Refer to the National Fire Protection Association (NFPA) 12-A for additional information. Although that document permits a maximum interval of 20 years between pressure tests for Halon cylinders continuously in service, a 12-year interval is recommended for field installations.

Refer to **RPSHSE – 4 Classification and Rating of Fires and Portable Extinguishers** for additional information.

Section III
7.1.4 RPSHSE – 4
Classification/Rating of Fires and Extinguishers

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Section III RPSHSE 7.1.5

Valid from: November 2008

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0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
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Section III**7.1.5 RPSHSE - 5****Personal Protective Equipment (PPE)****Contents**

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1.0 Introduction

The use of Personal Protective Clothing and Equipment is **required** when doing certain types of work. This standard is designed to teach employees the required Personal Protective Equipment (PPE) for the job at hand. Each employee is responsible for checking his or her protective clothing and equipment before using it.

Maintain personal protective clothing and equipment in a clean condition. When there is chemical contamination, decontaminate the clothing by the most appropriate method to remove the contamination or dispose of the clothing properly. **Do Not** wear or use defective or contaminated clothing or equipment. **Do Not** bring contaminated clothing or equipment into eating areas. On-site Field Supervisors are trained in the recognition of contaminated Personal Protective Equipment (PPE) and proper industry standard for the decontamination or disposal of contaminated Personal Protective Equipment (PPE).

Remove any clothing saturated with oil or petroleum products as soon as possible and wash the affected part of the body with soap and water. Oil or petroleum products may irritate the skin and are dangerous in the case of fire. Wear normal wearing apparel "**outer garments**" under all types of protective clothing. Store personal protective clothing or equipment in a proper area or container so it will remain clean, undamaged, and ready for use.

It is the **REPOWER USA** policy to furnish personal protective equipment such as head ear, non-prescription safety glasses, and uniforms. Special protective equipment such as Nomex clothes and respirators, etc. will be provided by either the Client or **REPOWER USA**, as required on a specific job basis. It is **REPOWER USA** policy **NOT TO PERMIT** the use of employee-owned personal protective equipment (PPE).

2.0 Personal Protective Equipment (PPE) Hazard Assessment

REPOWER USA has assessed the need for Personal Protective Equipment (PPE) concerning the types of services offered to the Client and **REPOWER USA** personnel have been trained and equipped accordingly. As new equipment is required due to changes in processes, procedures, or potential exposure, the affected employee(s) shall be notified of the potential hazard and the appropriate steps needed to protect themselves. The appropriate steps may include the use of additional Personal Protective Equipment (PPE) up to and including work practices or procedure redesigns.

Personal Protection Equipment (PPE) requirements, potential hazards, controls, recommendations and actions are addressed in their respective topic areas.

The data included in each topic area represents the assessment of the potential hazards and exposure to which **REPOWER USA** personnel may be exposed and the recommendations and findings of the assessment. The assessment was conducted in accordance with 29 CFR 1910.132 and other applicable publications.

The Personal Protective Equipment (PPE) Assessment Program is reviewed on an annual basis with more frequent reviews when new equipment is introduced, when industry accidents occur, and hazard reports or operational processes changes. The **REPOWER USA** HSE Department is responsible for the program review and the implementation of the required modifications.

3.0 Wearing Apparel (General)

3.1 Jewelry

Do Not wear rings, watches, bracelets, and other jewelry while using tools or working around electrical equipment or machinery with rotating components. However, such articles may be worn if they are rendered secure or nonconductive by covering, wrapping, or insulating by some other method.

3.2 Special Clothing

The special clothing in **Appendix IV** provides increased protection to employees exposed to hazardous substances or working conditions. Clothing purchased by **REPOWER USA** for employee use is to be worn for all required work.

- Nomex clothing is designed to protect the wearer from unexpected short-duration flash fires by providing an insulating barrier between the wearer's skin and the flames. It also prevents garment ignition, a major factor in burn injuries. Nomex clothing is not designed for deliberate entry into a fire situation; it does provide a few additional seconds to escape from an unexpected fire situation. This extra margin of safety could prevent serious injury.

REPOWER USA will provide Nomex clothing for employees working in Operations/Mechanical crews for work that requires such protective clothing.

3.3 Outer Garments

Employees working in operations or maintenance must wear apparel that minimizes body exposure to burns, chemicals or the natural elements (i.e., the sun, wind, rain, etc.). Clothing such as sleeveless or mesh shirts, tank tops, muscle shirts, shorts, etc. are **NOT PERMITTED** as outer garments as they may prove a safety hazard due to the lack of adequate protection for the body.

- Minimum acceptable outerwear apparel permitted includes sport shirts or blouses with sleeves, worn with full-length trousers or overalls.

- Clothing made from synthetic material is **not permitted**. Synthetic clothing may produce static electricity and melt upon contact with fire. Some jobs may require more than the minimum acceptable clothing, and/or due to HSE Regulations of Client/**REPOWER USA** requirements employees may be required to wear additional safety clothing.
- Trouser legs should not be rolled above the ankles for most work. Shirttail should be tucked in.
- **Do Not** wear long, dangling sleeves, neckties or other loose clothing when working with tools on machinery.

3.4 Welders

Welders should have apparel that

- Protects the skin from hot sparks, electrical arcs or welding rays.
- **Do Not** catch sparks. Open pockets and pants cuffs are spark catchers; ensure that shirt pockets are closed and pants are not cuffed.

Welders shall not use their clothing to clean torch tips. Acetylene-impregnated clothing is highly flammable.

4.0 Footwear

Foot injuries can occur while walking, climbing, lifting materials, or working around benches, etc., where equipment, parts, or supplies are stored or used. Typical foot injuries occur due to falling objects that strike the foot with adequate energy to cause bruising, breaking, or possibly severance of the limb. Other injuries occur due to using shovels, stepping on rocks, piping, etc., and chemical or heat burns from process treatment, steam, etc.

4.1 General

Field employees are required to wear sturdy leatherwork shoes or boots. Steel-toed footwear is required at certain work sites by Client request. **Canvas tennis shoes and light footwear (sandals and flip-flops) are not acceptable.** Employees are encouraged to wear safety shoes with cross hatch tread soles with pronounced heels (no wedge type soles). **NO METAL** may protrude from shoe bottoms (for example, nails, heeltaps, etc.). **Shoes with hobnailed or metal plates shall not be worn, as there is a danger of sparks slips, or falls.**

Keep shoes in good repair. Slipping accidents are more likely to occur when shoe heels and soles are run down and worn. Nails or other sharp objects will easily penetrate a thin worn shoe sole.

The employee's immediate On-Site Field Supervisor is responsible for monitoring this policy.

In job sites where required by Client, approved safety-toe protective footwear must meet the standards established by the American National Standards Institute, Inc (ANSI). Each shoe **must** have the proper ANSI Z41 verification stamped in the shoe, typically on the underside of the shoe tongue. I-75 (impact rating) and C-75 (compression rating) are the highest classification ratings available.

Chemical/Physical Hazard Boots Employees should wear rubber boots or appropriate footwear while working in or around water, oil, petroleum, or chemical products. On-Site Field Supervisors are to be trained in the recognition of proper footwear and the proper industry standards for Personal Protective Equipment (PPE) for chemical exposure.

4.2 Annual Footwear Assessment Program

4.2.1 Controls:

Unless discussing chemical or hazardous material protection, OSHA Regulations are vague concerning the use of protective footwear except in the Outer Continental Shelf (OCS) waters. However, **REPOWER USA** has a policy that sets forth the minimum acceptable footwear requirements.

This policy is relative to all **REPOWER USA** operations and areas other than where office and clerical work is taking place. The **REPOWER USA** Health, Safety, and Environmental Manual, Section III, 7.1.5 RPSHSE – 5 specifies the minimum requirements, discusses the “**Footwear Protection Program**”, and addresses the additional requirements adopted locally.

4.2.2 Recommendations

With the implementation of a local “**Footwear Protection Program**” employees are encouraged to purchase footwear above **REPOWER USA** minimum guidelines. The additional protection of safety-toed footwear could possibly reduce or prevent crushing/bruising injuries as well as slips, trips and falls from substandard heel and sole footwear.

4.2.3 Action

The minimum footwear requirements, as outlined in **REPOWER USA** Health, Safety and Environmental Manual, Section III, 7.1.5 RPSHSE - 5, Personal Protective Equipment (PPE), are adequate to cover existing hazards.

5.0 Personal Flotation Devices (Life Vests)

During offshore transportation, personnel transfers, spill cleanup operations, etc. life vests must be worn at all times. An employee shall wear a life preserver or work vest approved by the U.S. Coast Guard while working above, in, or around water. Prior to each use, inspect the life jackets and buoyant work vests for dry rot, chemical damage, or other damage that might affect their strength and buoyancy.

NOTE: AT THIS POINT THIS PORTION IS NOT APPLICABLE TO REPOWER USA OPERATIONS – BUT WILL BE LISTED FOR FUTURE OFFSHORE OPERATIONS AS APPLICABLE

(Documentation of Personal User Inspections is not required.) Repair or replace defective life jackets or work vests.

6.0 Fall Protection and Retrieval Equipment

Slips, trips, and falls continue to be the leading cause of accidents and serious work place injuries. The significant amount of work environment exposure to falls or potential falls of each employee during their daily work tasks is part of the reason these types of accidents account for a large portion of occupational injuries.

Injuries can occur to the body from many potential incidents.
Some examples are:

- Falls from heights.
- Slips and trips.
- Falls while walking on different elevations.
- Stairways.
- Climbing ladders.

6.1 General

Fall protection and retrieval equipment is used to protect employees working in conditions that require the fall protection of personnel. **REPOWER USA** operations and maintenance are generally performed at or about ground level, lifelines or harnesses are seldom used. Due to the infrequency of use, when a job requiring fall protection occurs, a review of this material shall be given to all employees through the pre-job HSE Orientation and Training. On-Site Field Supervisors are to be trained in the recognition of the proper footwear and the proper industry standards for Personal Protective Equipment (PPE) for chemical exposure. Generally, safety harnesses provide increased protection to employees in case of a fall but harnesses are appropriate to use in the situations discussed below.

Harnesses and lifelines shall be worn

- While working on structures outside of the protection of handrails that are more than 6 feet above the ground.
- Near the edges of tank roofs, roofs, or buildings, etc., that railing do not guard against.
- While working from a ladder height over 6 feet above ground and requires the use of both hands. The safety harness lifeline will be attached to a permanent member.
- Only approved harnesses and lifelines can be used in operations.

6.2 Strength and Storage Requirements

Lifelines (harness lanyards) must be a minimum of ½" nylon, or the equivalent, with a breaking strength of at least 5,400 pounds. Lifelines must have a maximum length to prevent a fall of more than 3.5 feet.

- Lifelines or lanyards used for fall protection must be secured to an anchorage or structural member capable of supporting a minimum dead weight of 5,400 pounds.
- Maintenance crews shall be equipped with the appropriate fall protection and retrieval equipment where required. Various components of the equipment are to be used during the vertical entry into confined spaces of more than four feet in depth.
- If the harness has experienced an impact force, such as that incurred in arresting a fall, remove it from service immediately and never use it again for personal safeguarding.
- Store harnesses, lifelines, and lanyards in a clean dry place free from abrasive or cutting materials, direct sunlight, and excessive heat.

6.3 Fall Protection and Retrieval Equipment Assessment Program

6.3.1 Controls

Regulations cover a portion of work place activities such as harnesses, ladder and stairway use and design, and walking surface design. These regulations are included in the facility design as outlined in API Recommended Practices. In addition, **REPOWER USA** has trained its personnel on the rules for preventing slips, trips, and falls through the use of videos, General Safety Rules, and Housekeeping Practices (which require clean up and barricading spills). Control from contact with hot fluids includes the use of engineering practices, proper procedures, and the proper Personal Protective Equipment (PPE). Regulations cover general control procedures such as boil over protection on tanks and protection against employee contact. **REPOWER USA** employees are trained in the proper storage and maintenance of Fall Protection Equipment.

6.3.2 Recommendations

REPOWER USA shall continue to enhance the training standards to meet the challenge of the changing regulations and recommended design changes to the facilities at which **REPOWER USA** works and/or operates for their Clients. This is to minimize potential injuries from slips, trips, and falls, contact with hot fluids from process operations, or other miscellaneous activities that can affect the entire body. Utilize industry statistics and incidents etc. to personalize the importance of following safe work practices.

6.3.3 Actions

REPOWER USA shall continue to enhance the training standards to meet the challenge of the changing regulations with emphasis on the proper use of Personal Protective Equipment (PPE) to reduce the potential of injuries in the work place.

7.0 Gloves

Hand hazards are present at all times while employees are working. Hand injuries such as nicks, scraps, cuts, punctures, burns, etc. occur if the hand comes in contact with hot surfaces (+120° F) or sharp objects (razors, knives, sheet metal, broken glass, nails or other miscellaneous objects with sharp edges).

Additional injuries can occur when the hand is hit by moving objects such as falling pipe, dropped tools, or unexpected equipment movement and by inserting the hand into known pinch points such as between a wrench and a piece of equipment or between a pipe or object being moved.

7.1 General

Special protective gloves may be required in certain situations for protection against hazardous or toxic substances. **ALWAYS** refer to the Material Safety Data Sheets (MSDS) and the Original Equipment Manufacturer (OEM) of chemical products or the Client for the recommended glove types in the handling of hazardous substances.

- On-Site Field Supervisors are responsible for specifying when employees must wear protective gloves.
- When working near energized high voltage circuits or equipment **REPOWER USA** qualified electrical personnel shall wear rubber gloves with leather protectors in the following situations:
 - Conducting a voltmeter test on high voltage cables.
 - Opening or closing high voltage cutouts and removing or replacing fuses.
REPOWER USA qualified electrical personnel must wear gloves even when using hot sticks.
 - While working on or within falling or reaching distance (i.e., less than 5 feet) of any circuit or piece of equipment which may become energized above 300 volts. **Do Not** remove gloves until entirely out of falling or reaching distance of such circuits or apparatus.

7.2 Glove Assessment Program

7.2.1 Controls

OSHA has regulations concerning the protection of hands for specific jobs such as welding or handling extremely cold or hot materials, etc. In addition, **REPOWER USA** has a policy that advocates the use of the appropriate gloves when conducting day-to-day activities as well as specific tasks that pose a potential hand hazard.

7.2.2 Recommendations

Injury history indicates numerous hand injuries that resulted from pinch points, misuse of tools and equipment, and/or contact with cold or hot surfaces, sharp objects, or other materials.

Designing out the daily potential exposures has reduced the number of hand injuries to the electricians, operators, and mechanics. To reduce the potential of hand injuries the appropriate pneumatic tools have been purchased to replace some types of hand tools and the above mentioned glove policy has been implemented. A review is completed at the start of each job to assess any new injury potential or trend as well as to provide training on the proper use and importance of gloves.

7.2.3 Action

The training of **REPOWER USA** personnel about the rules, policies and hazards shall continue periodically to maintain understanding. The training shall include awareness of **REPOWER USA** Health, Safety, and Environmental Manual, Section III, 7.1.5 RPSHSE - 5, Personal Protective Equipment (PPE) and other published data. Additionally, **REPOWER USA** HSE Department "**SAFETY ALERTS**" and published industry alerts shall be utilized to heighten awareness of **REPOWER USA** employees to the potential of hand injuries and their exposure to more serious injuries.

8.0 Hard Hat Classification

REPOWER USA employees could probably be struck by objects, equipment or other miscellaneous items used in or around the facilities in which they work. These objects can fall from various heights above the employee or from unsecured work equipment during use.

8.1 General

Hard hats are designed to prevent head injury due to impact, flying particles, and chemical spills, and, in some cases, electrical shock. Hard hats can also help to contain an employee's hair and prevent its entanglement in machinery or its exposure to irritating substances.

ALL REPOWER USA hard hats must comply with ANSI 89.1 Class "B" requirements at a minimum. ANSI classes are as follows:

- **Class A - Meet all the material strength and fire resistance requirements of ANSI Z89.1-1969 (influences protection) but have limited voltage protection qualities.**
- **Class B - Same as Class A but has qualities for high voltage protection as listed in ANSI Z89.2-1971 (electrical protection).**
- **Class C - has no voltage protection qualities. This class does not meet OSHA or ANSI requirements.**

8.2 Proper Use

Each **REPOWER USA** employee or visitor in field operations will be issued an approved hard hat. Hard hats **MUST** be worn at all times in field locations except when an employee or visitor is:

- In an office.

- In a vehicle.
- In a control room.
- In a break area.
- **Do Not** store hard hats in the rear window of a vehicle.

Each manned facility shall have an adequate supply of visitor hard hats, which are kept in a clean and sanitary condition.

8.3 Modifications

Do Not modify a hard hat in any way, which will alter its safety features. This includes drilling holes, trimming or painting which could alter the properties of the plastic.

No metallic stickers or metallic objects may protrude or be affixed to any hardhat or hardhat accessory.

REPOWER USA - approved safety award decals, general safety slogan stickers, etc., are permitted.

The hardhat suspension must be well maintained and adjusted with about one inch of clearance between it and the shell. Winter liners to protect the ears, head and neck are recommended when working in cold weather.

8.4 Hard Hat Assessment Program

8.4.1 Controls

In the **REPOWER USA Health, Safety, and Environmental Manual**, the policies and procedures state that non-authorized personnel are required to remain outside of barricaded areas when overhead/dangerous work is being performed. Jobs shall be conducted in a safe manner including the securing of tools, scaffold boards, equipment, and other loose items when working from heights. Non-authorized personnel shall remain outside the person wire patterns of rigs/derricks when equipment is operating. When working around cranes, employees must use tag lines to remain clear of overhead loads. When overhead/dangerous work has the potential of generating flying objects such as hammers, pile drivers, etc. steps shall be taken to minimize the potential impact to other workers. A common practice to secure a work site is to install additional guards and secure tools with rope or etc.

8.4.2 Recommendations

It is mandatory that all **REPOWER USA** employees working outside a normal office environment shall wear an approved **HARD HAT** that meets the most current ANSI Standard. Hard hats may be required in office environments as well as where the job hazards dictate.

8.4.3 Action

REPOWER USA shall continue to supply ANSI approved hard hats for all **REPOWER USA** personnel working in or around operating areas and also require their use when outside the building. In addition, wearing hard hats is required in mechanic shops whenever overhead work is in progress etc.

9.0 Eye and Face Protection

Injuries to the eyes and face can occur due to flying materials from operations such as handling chemicals, painting, chipping, grinding, or when wind conditions lift and carry airborne particles. In addition, welding and gas brazing/cutting operations can cause injuries due to flying particles, high heat, and light exposure.

9.1 General

Employees are required to wear the proper eye protection whenever an eye and/or face hazard exists. Supervisors are also responsible for ensuring that employees wear adequate eye protection when required.

- Learn to recognize potential eye/face hazards, wear eye protection and know the correct type of eye protection needed.
- Anyone working near or observing another person doing work, which requires eye protection, must also wear eye protection.
- There are many types of eye and face protection. The general rule is that maximum protection may be used for minimum exposure but minimum protection must never be used for maximum exposure. Minimum protection is spectacle-type safety glasses.
- Properly adjust safety glasses, goggles, and shields to ensure maximum eye and face protection and comfort. When adjusting goggles set the headbands properly on the head and adjust them to allow the lenses and face piece to cover the eye area completely.

9.2 Spectacle-type Safety Glasses

Each employee who is issued a pair of safety glasses is responsible for their proper care and for having them available for use on all occasions needed.

Employees must wear industrial-grade safety glasses as minimum protection. Wear safety glasses to protect your eyes when:

- Machining and drilling.
- Removing retaining bands on bundled material.
- Using striking tools: hammers, axes, hatchets, etc.
- Moving/cutting tree branches.
- Cutting and splicing wire rope.
- Light grinding.
- Digging with a pick.

- Operating power mower or edgers.
- Any general light work where in the opinion of the supervisor, this type of eye protection is required. (See ANSI Selection Chart.).

Prescription lenses in street wear frames shall not be substituted for industrial safety spectacles. These lenses are heat-treated and have an acceptable breakage pattern but they are thinner and withstand less impact. Tinted lenses will not provide adequate protection from welding arcs and are unacceptable in welding areas.

Polycarbonate safety lens spectacles meet the ANSI Z87.1 requirements and offer the same impact protection as spectacle-type safety glasses.

9.3 Goggles

Impact Resistant (Direct Ventilation) – these are general-purpose (except chemical) with a .050" minimum thickness and removable plastic lens goggles which are made to wear with safety glasses. They provide protection to employees where there is a possibility that an impact could occur with significant force, such as:

- Handling materials that are not chemically hazardous but that contain large chips, particles, sand, dirt, etc.
- Scraping paint, rusts, scale, etc.
- Heavy chipping, hammering, etc.
- Performing any general heavy work where, in the opinion of the supervisor, this type of eye protection is required.

Chemical Resistant (Indirect Ventilation) - these are similar to impact goggles but they are indirectly vented to resist chemical exposure. Wear them when there is a chance of chemical splash, such as:

- When performing lab analysis.
- Repairing, unplugging, filling, opening or disconnecting lines, pumps, equipment, flanges, or containers which may spray, pour, drip, or splash.
- When handling sodium chromate or any other chemically corrosive dust.
- Performing any job where an eye injury can occur due to splash or spray.

9.4 Welding Goggles and Hood

Welders shall wear welding hoods with the appropriate shaded lenses while welding.

Clear safety spectacles with side shields must be worn under welding hoods. Check welding hoods frequently for light leaks around the lens frame and around the body of the hood.

Any person directly observing brazing, cutting or welding operations should wear eyecup type welding goggles or a welding hood with appropriate lenses.

Any other person close to welding operations who might be subject to reflected or incidental arc flash should wear approved safety glasses, goggles, or a welding hood with the appropriate shaded lenses.

9.5 Face Shields

Plastic face shields of .060" thickness may be used as face protection from sparks and flying particles in grinding, machining, buffing, sanding, chipping, etc. Wear face shields for face protection in addition to goggles and/or safety glasses.

NEVER wear face shields by themselves for face protection.

9.6 Eye and Face Protection Assessment Program

9.6.1 Controls

Current regulations govern the use of eye protection when handling chemicals, chipping, grinding, welding, brazing and cutting, or other jobs that expose the employee to potential eye injuries. Specific jobs require Personal Protective Equipment (PPE) for the type of hazard presented by the task. The type of Personal Protective Equipment (PPE) is found in the **REPOWER USA** HSE Manual, Section III, 7.1.5 RPSHSE - 5, Personal Protective Equipment (PPE).

In addition to wearing the required Personal Protective Equipment (PPE), employees shall review the work area to determine if any non-protected personnel in adjacent areas could be affected by the job(s) being performed. If other work areas are potentially exposed to eye and face hazards then posting signs, barricading the area, and wearing Personal Protective Equipment (PPE), etc. shall be required to protect those additional personnel.

9.6.2 Recommendation

REPOWER USA shall continue to enhance the training standards for Personal Protective Equipment (PPE) and shall be focused on thorough training and safety meetings to meet the challenge of the changing regulations and work environment. No additional policies are warranted at this time for protection from wind blown particulate matter.

Due to the special nature of welding, gas brazing and cutting operations it is recommended that **ALL** contract personnel with expertise in these areas continue to be used on a normal basis to minimize the potential for injuries. However, if training and proper Personal Protective Equipment (PPE) is utilized by **REPOWER USA** personnel as outlined in the **REPOWER USA** Health, Safety, and Environmental Manual, their exposure will be minimized.

9.6.3 Action

REPOWER USA shall provide impact/splash-protective goggles and face shields as well as specific eyewear for cutting/welding operations as necessary for **REPOWER USA** personnel. In addition, **REPOWER USA** shall provide non-prescription safety glasses for employees to encourage eye safety in all facets of operations.

10.0 Hearing Conservation

Hearing damage can occur from regular, periodic or continuous exposure to high noises (85 dBA+). Large sound blasts or explosions can also cause instantaneous damage to hearing as well.

The type of noise most commonly encountered in **REPOWER USA** operations is periodic exposure to elevated noise levels from machines, electric motors, process flows, steam generators, etc.

All employees and casual visitors exposed to noise levels equal to or greater than 85 decibels shall wear hearing protection devices.

- Hearing protectors should be provided to employees (and made available to casual visitors). Either plug or muff types should be available. On-Site Field Supervisors are responsible for ensuring that hearing protection is worn in required areas.
- Disposable or reusable ear plugs (inserts) and earmuffs are furnished by **REPOWER USA**.
- Soiled disposable plugs are not to be reused.
- Earmuffs or plugs are **REQUIRED** in some designated areas where high noise levels exist. Noise level **CAUTION** signs must be posted on entrance doors or close to these areas.

The sign should state:

"Caution: Ear protection is required while equipment is operating"

MUFFS or PLUGS are REQUIRED when equipment is operating in the areas listed below:

- Engine rooms.
- Turbine and pump rooms.
- Compressor rooms.
- Other locations where high noise levels may be identified or may occur, signs should be posted and hearing protection should be required and made easily accessible.

To allow for the proper usage of personal hearing protection, earmuffs or plugs should be placed outside of designated areas such as pumps, turbines, and engine rooms.

When using loud machinery or power tools, employees are required to wear **MUFFS** or **PLUGS**.

10.1 Hearing Conservation Assessment Program

10.1.1 Controls

OSHA regulated hearing protections are achieved by setting the protection levels for all workers exposed to occupational noise. These controls form the basis for **REPOWER USA's Hearing Conservation Program** and include items such as high noise level area postings, sound level and noise dosimeter surveys, and training and annual audio metric testing where required.

In addition, **REPOWER USA** has General Safety Rules outlined in the **REPOWER USA Health, Safety and Environmental Manual, Section III, 7.1.9 RPSHSE - 9, Hearing Conservation** that require all personnel to wear hearing protection when noise levels reach 85 dBA or greater.

10.1.2 Recommendations

This data is due to the types of noises our personnel are exposed to, the duration of exposure, and the way equipment is spaced. Potential high noise generating sources at client facilities should be reduced during upgrades in facilities by designing out equipment or dampening potential noise generation equipment. The **REPOWER USA Health, Safety and Environmental Manual** advocates the systematic review and control of noise generation in facilities and shall be followed where applicable to reduce occupational noise exposure.

10.1.3 Action

REPOWER USA shall to provide a selection of hearing protection devices along with annual training and work site reviews to employees and provide annual and pre-employment hearing audio metric testing for affected personnel.

11.0 Skin Protection

11.1 General

Exposed skin surfaces may be harmed by contact with petroleum products or other potentially irritating substances present in the work environment. Protective apparel and the use of personal skin care products can reduce the hazards of skin irritation or dermatitis.

Protective apparel has been defined in other areas of **7.1.7 RPSHSE - 7** as:

- Hard hats.
- Safety Eye wear and face shield.
- Gloves.
- Clothing.
- Footwear.
- Fall Protection.
- Hearing Conservation.
- Electrical equipment.
- Respiratory Protection.
- Bloodborne Pathogens.

Skin creams and lotions are listed on the Approved HSE Equipment List. It is recommended that each location maintain an appropriate supply of the following products.

11.2 SKIN Protection Assessment Program

11.2.1 Controls

The Bloodborne Pathogen Exposure Control Plan includes the required training and control procedures for potential exposure to infectious diseases.

11.2.2 Recommendations

REPOWER USA policy is to practice making active responses to blood and bodily fluid injuries selectively based on the decision of the individual responder.

11.2.3 Action

No additional action is necessary except for the training and Personal Protective Equipment (PPE) requirements as provided for in the **REPOWER USA Health, Safety, and Environmental Manual, Section III, 7.1.19 RPSHSE - 19, Bloodborne Pathogens.**

12.0 Electrical

Electrocution is the second leading cause of death among workers in general industry. Every year electrical current kills approximately 300 workers. You are responsible for your personal safety when working around electrical hazards. In order to be safe, you need to understand how electricity works.

12.1 General

Energized electrical sources are present in all of the facilities where **REPOWER USA** operates. These sources range from low voltage (6 volts) to the high voltage transmission lines (+50KV). Employees could be exposed to these sources when working in or around electrical sources.

12.2 Electrical Assessment Program**12.2.1 Controls**

REPOWER USA employees are trained in accordance with OSHA Regulations concerning Lockout/Tagout, Qualified and Non-qualified Electrical training requirements and other applicable safety/skill training. These controls are intended to prevent non-qualified personnel from working on energized electrical sources. In addition **REPOWER USA Health, Safety, and Environmental Manual, Section III, 7.1.8 RPSHSE - HAZCOM, 7.1.11 RPSHSE – 11 – Hand Tools and 7.1.5 RPSHSE - Personal Protective Equipment (PPE)** outline necessary controls to prohibit the wearing of conductive materials when working within arms reach of unguarded electrical switch gear. If Qualified Electrical personnel perform work on an energized electrical circuit then the proper electrical gloves shall be worn in addition to following safe work procedures and the use of additional Personal Protective Equipment (PPE) as necessary.

12.2.2 Recommendations

REPOWER USA injury data shows no significant or serious electrical shock history to its personnel. Current controls and training appear to be adequate and shall continue.

12.2.3 Training

Training shall continue as required by regulations and the **REPOWER USA** guidelines to employee training. Appropriate Personal Protective Equipment (PPE) will continue to be provided to appropriate personnel.

13.0 Respiratory Protection

Where it is impossible to eliminate harmful quantities of dusts, fumes, vapors or gases, **ALL REPOWER USA** employees in the area of contamination shall be protected in a manner that will ensure a supply of clean air. Approved respiratory protection equipment shall be used and then only by personnel certified to wear respiratory protection.

13.1 General

REPOWER USA employees may be exposed to varying concentrations of toxic gases or materials as well as other nuisance dusts. Normal respiratory hazards exist from various chemicals, Hydrogen Sulfide (H₂S), Natural Occurring Radioactive Materials (NORM) or radon gas, benzene, toluene, and asbestos. Additional hazards such as paints, dust from grinding, chipping or natural airborne contaminants (dust) are also present.

13.2 Respiratory Protection Assessment Program**13.2.1 Controls**

Engineering controls such as using bulk tanks for chemical storage, installing Varac gauges on tanks, etc. have been greatly utilized.

Refresher training on the types of potential exposures and the controls necessary to protect employees against respiratory hazards is conducted annually. Full face (SCBA), fresh air hose line units, or full and half mask cartridge respirators have proven to be effective in protecting employees.

Regulations requiring respiratory protection for airborne contaminants and the **REPOWER USA** Respiratory Protection Plan are to be found in the **REPOWER USA Health, Safety, and Environmental Manual, Section III, 7.1.5 A RPSHSE – 5A, Respiratory Protection.**


In addition, operating areas have regular Industrial Hygiene surveys to determine the exposure levels for known respiratory hazards. The Industrial Hygiene surveys for existing operations have indicated no exposures above the Permissible Exposure Levels (PEL's) in force at the time. However, site-specific task such as confined space entry do present potential hazards and engineering and Personal Protective Equipment (PPE) controls shall be used to mitigate those potential hazards.

13.2.2 Recommendations

However, focus on training and safety awareness shall be done to ensure that **REPOWER USA** personnel observe steps to protect themselves beyond the established Permissible Exposure Limits (PEL).

13.2.3 Actions

REPOWER USA shall continue to provide a selection of respirators for potential or actual respiratory hazards. Training and safety awareness shall focus on the employees who wear respirators for jobs where contaminants may be present as well as those jobs where testing shows an actual hazard.

	Section III RPSHSE 7.1.5A	Valid from: November 2008
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Revision Profile

Rev.	Date	Name	Approval Signature	Remarks
0	11/08	Owens O'Quinn QHSSE Consultant	On File	ORIGINAL
0	11/08	Tammy Conekin	On File	ORIGINAL
1				
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3				
4				
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Original Review Progress

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11/08	J.K. Barrilleaux – Grammar/Technical Format <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Owens O'Quinn – QHSSE Consultant <i>Evergreen QHSSE Solutions LLC</i>	On File
11/08	Tammy Conekin – Head of Service	On File



Section III 7.1.5 A RPSHSE – 5 A
Respiratory Protection
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1.0 Introduction

It is in the air. You may not be able to see it but every so often people who work in it are killed or get sick. The guidelines in this program are designed to assist in reducing employee exposure or potential exposure to dust, fumes, mist, radio nuclides, gases and vapors. The **REPOWER USA** Respiratory Program sets forth accepted practices for respirator use and their care. The primary objective is to prevent excessive exposure to these contaminants. When feasible, exposure to contaminants shall be eliminated by engineering controls. When effective engineering controls are not sufficient the use of personal respiratory protective equipment may be required.

2.0 Policy

To provide, implement, and enforce a written **REPOWER USA** Respiratory Protection Program at each location where hazardous atmospheres have the potential to cause personal injury or illness.

Proper Respiratory Protective Equipment, as specified for each particular hazard, **SHALL** be provided and used when known or potentially suspect conditions warrant their use. A hazardous atmosphere is defined as any atmosphere containing a toxic substance at or above the Occupational Safety and Health Administration (OSHA) published Permissible Exposure Limit (PEL) or other published exposure limits, or when oxygen content is less than 19.5% or above 23.5 % by volume of air. All pertinent Material Safety Data Sheets (MSDS) **SHALL** be reviewed to determine if Respiratory Protection will be required.

A Job Safety Analysis (JSA) addressing Respiratory Protection **SHALL** be completed by the On-Site Competent Person, the On-Site Field Supervisor, the On-Site HSE Coordinator, or the **REPOWER USA HSE Manager** to determine if the current job will require Respiratory Protection. The **REPOWER USA HSE Manager** is the designated administrator of the **REPOWER USA** Respiratory Program. **REPOWER USA** HSE Manager shall maintain appropriate training, knowledge of the complexity of the Respiratory Program, and conduct evaluation as directed and required. **REPOWER USA** HSE Manager shall revise the Respiratory Procedure as applicable during the **REPOWER USA** HSE Manual review. **REPOWER USA** specific work-site procedures are addressed on a site-by-site basis due for potential specific requirements at that are site **ONLY** requirements.

3.0 Procedures

Respirators will be selected based on hazards to which the worker is exposed utilizing the NIOSH (National Institute for Occupational Safety and Health) Respirator Decision Logic as a guideline. Outside consultation, the manufacturers' assistance, and other recognized authorities will be consulted if there is any doubt regarding proper selection and use.

Before any employee is authorized to wear breathing apparatus, five conditions **SHALL** be met:

- Employees shall be trained on the breathing equipment.
- Training is provided to each employee at no cost to the employee.
- Employee shall be medically evaluated and certified physically capable of wearing the equipment. The medical evaluation and evaluation is provided to the employee at no cost.
- Employees shall be able to maintain a good seal between the respirator and his/her face.
- An acceptable respirator, in appropriate operating condition, shall be available to the employee. Respiratory Protection Equipment is furnished to the employees at no cost.

3.1 Employees Covered

Respirators, which are a form of Personal Protective Equipment (PPE), shall be used for protection from potential atmospheric contaminants and oxygen deficiencies. This policy applies to any **REPOWER USA** employee using a hazardous material that requires a respirator as a protective device per the Material Safety Data Sheet (MSDS) and other appropriate publications.

Situations that may require respirator usage/protection include:

- During the time required to evaluate, install, and implement feasible engineering and work practice (administrative) controls.
- In work operations for which it is established that the use of engineering or administrative controls is not feasible for compliance with either the Permissible Exposure Limit (PEL) or an 8-hour time-weighted average exposure or short-term exposure. This might be the case in some maintenance and repair activities, tank cleaning, or other operations where exposures are intermittent in nature and limited in duration, including:
 - Oxygen deficient atmospheres.
 - Emergencies where there is threat to human life, the environment and/or the property of company or the Client.
 - Where Immediately Dangerous to Life and Health (IDLH).

This HSE Policy and Procedure meets the OSHA requirement for a written program found in 29 CFR Parts 1910.123,132,134.

3.2 Potential Exposure Operations

Potential exposure may require respiratory protection in the following situations, depending on exposure level and the material encountered. **REPOWER USA** will provide the appropriate Respiratory Protection Equipment to assure **REPOWER USA** Employees are sufficiently protected during work in adverse conditions.

3.2.1 Routine Operations:

- Confined Space Entry.
- Hydrogen Sulfide (H₂S) Operations.

- Welding, cutting or grinding.
- Spray application of materials such as paint, pesticides, adhesives, solvents, herbicides, coating resins, etc.
- Tank and Vessel Work.
- Any hazardous material handling (per MSDS requirements).

3.2.2 Semi-routine Operations

- Pump overhauls.
- Stationary tank cleaning or repair.
- Fluid draining operations of equipment.
- Installation and removal of pipeline valves, etc.

3.2.3 Emergency Response Operations

- First Responder Operational Awareness spill and release response.

3.3 Medical Qualifications

REPOWER USA personnel **SHALL** not be allowed to use respirators until it has been established by **REPOWER USA** Medical Consultant, designated by the **REPOWER USA HSE Manager**, that they are medically fit to use the respiratory equipment in the assigned work-site. The **REPOWER USA** employee will complete a confidential medical questionnaire. The medical questionnaire shall be administered confidentially by the **REPOWER USA** designated **REPOWER USA** Medical Consultant. The equipment, training and Medical Examinations are provided to employees at no cost to the employee.

The **REPOWER USA** Medical Consultant shall make the final decision pertaining to an individual's ability to wear a respirator. The employee will be given the opportunity to discuss the results of the Medical Questionnaire and evaluation with the physician and/or licensed health care professional. The questionnaire results will be compared to answers from the previous year (if applicable). A medical will be required only if there are changes from the previous year.

The **REPOWER USA HSE Manager SHALL** maintain a summary sheet indicating those **REPOWER USA** personnel who are medically qualified to wear a respirator and those personnel who are not medically qualified to wear a respirator at the appropriate **REPOWER USA** Office. The **REPOWER USA HSE Manager** will provide copies to the On-Site Field Supervisor and the On-Site HSE Coordinator as work-site conditions require.

3.4 Respirator Selection

The nature of the hazard or potential hazard **SHALL** determine the type of respirator that will be required for a particular operation. Only positive pressure Self-Contained Breathing Apparatus (SCBA) or positive pressure line respirators with full emergency egress bottles **SHALL** be used when an employee is exposed to atmospheres considered Immediately Dangerous to Life and Health (IDLH) as defined by Occupational Safety and Health Administration (OSHA).

If employee exposure cannot be identified or reasonably estimated, the atmosphere **SHALL** be considered Immediately Dangerous to Life and Health (IDLH) until proven otherwise. An air-purifying respirator may be used when contaminants are present in concentrations that exceed the Permissible Exposure Limit (PEL) or Threshold Limit Value (TLV) but are less than Immediately Dangerous to Life and Health (IDLH). They **SHALL** only be used in accordance with the manufacturer's recommendations for the contaminants they are designed to protect against. The respirator and cartridges **SHALL** also have current NIOSH approval numbers. Air-purifying respirators **SHALL NOT** be worn for protection against Hydrogen Sulfide (H₂S), or oxygen deficient or enriched atmospheres. In addition, when air-purifying respirators are used for gases and vapors, either End of Service Life Indicators (ESLIs) **SHALL** be used or change-out-schedules for cartridges or canisters **SHALL** be developed. **REPOWER USA** uses ONLY NIOSH approved Respirator Equipment which is appropriately fit tested prior to assignment to employee.

Filter Masks for nuisance dusts have very limited capabilities and are recommended only for floor dust, sawdust and some types of sanding. In cold weather, tasks requiring respirators **SHALL** not be attempted if the exhalation valve freezes. A nose cup **SHALL** be used with all respirators that may be operated in temperatures at or below 32° F. Self-Contained Breathing Apparatus (SCBA) that operate only in the demand mode **SHALL** be converted to pressure demand or positive pressure mode. The unit **SHALL** be clearly marked as being changed after the conversion by a tag or similar method.

To check if a unit only operates in the demand mode open the air cylinder and the main line valve on the regulator. If air **does not** flow, it **SHALL** be converted.

3.5 Respirator Effectiveness Monitoring

During the required use of Respirator Protection Equipment the On-Site Competent Person will monitor the proper use of **ALL** respiratory equipment and report all deficiencies to the On-Site Field Supervisor and the **REPOWER USA** HSE Manager immediately.

Further to this responsibility the Competent Person will:

- Have current documented training in Respiratory Protection equipment, regulations, and **REPOWER USA** Policies and Procedures.
- Remain in the area where respiratory protection is in use.
- Maintain visual contact with the entrants and or the attendant to monitor changes in the work area conditions and the degree of exposure or stress.
- Monitor and or direct the egress from the work area of employees using respiratory protection devices if any vapors or gases break through or if any changes in the breathing resistance or damage to a face piece occur.

- Instruct and monitor employees using respiratory protection to exit the area, wash their faces with soap and water, and clean the respirator face-pieces to prevent eye or face irritation.
- Monitor and replace respirators or respiratory protection devices that are defective.

4.0 Types of Respirators

4.1 Air-Purifying Respirators

Air-purifying respirators remove the contaminant from the air by filtering it or by chemically absorbing it before inhalation. The breathing action of the wearer operates this non-powered type of respirator. Never use air-purifying respirators in confined spaces or in an atmosphere that is considered oxygen deficient or Immediately Dangerous to Life and Health (IDLH).

Air-purifying (cartridge type) respirators, also referred to as negative pressure respirators, are available in two designs, half-face piece and full-face piece. Half-face piece air-purifying respirators do not provide any protection from vapors, gases, or particulates that may irritate the eyes.

Full-face piece air-purifying respirators provide protection against eye irritations in addition to protection against respiratory contamination.

The maximum contaminant concentration against which an air-purifying respirator will protect is determined by the design efficiency, the capacity of the cartridge or filter, and the face piece-to-face seal on the user. The maximum concentrations for which a particular cartridge is designed will be specified on the label of the cartridge. Always select the appropriate cartridge, which is explained below, for the particular atmosphere and condition.

4.2 Cartridge Type

4.2.1 Vapor and gas removing cartridges

- **Capabilities** – are designed to remove a single vapor or gas (i.e.: organic vapors) or a combination of two or more classes of gases or vapors (example, organic vapors and acidic gases) from air.
- **Limitations** – no protection is provided against particulate contaminants. Cartridges used with a half-face piece respirator will be limited to the manufacturer's recommendation and prohibited in atmospheres ten (10) times above the permissible exposure limit (PEL) of the air contaminant.

Full-face piece respirators of this type will be limited to the manufacturer's recommendation and prohibited in atmospheres 50 times above the permissible exposure limit (PEL) of the air contaminant.

If you sense any of the following **danger signals** **IMMEDIATELY GET INTO FRESH AIR**. These signals also indicate the cartridge may be used up or abnormal conditions may be creating vapor concentrations, which are beyond the limit of the respirator:

- Smell or taste chemical (breakthrough) or if your eyes, nose, or throat become irritated.
- It becomes difficult to breathe.
- The breathing air becomes uncomfortably warm.
- Become dizzy or feel like vomiting.
- Specific signs and symptoms of chemical exposure as specified in the Material Safety Data Sheet (MSDS).

Cartridges shall be replaced at the expiration of their service life or at the beginning of each shift in which they will be used, whichever comes first.

The use of vapor and gas-removing respirators is not approved in atmospheres where the contaminant lacks the adequate warning properties (such as crude oil or Hydrogen Sulfide (H₂S) where odor, taste or irritation is at a concentration at or above the PEL.

4.2.2 Particulate-removing cartridges

- **Capabilities** – filter type designs that remove a single type of particulate matter (for example, dust or asbestos) or a combination of two or more types of particulate matter (for example, dust and fumes) from air.
- **Limitations** – provides protection against nonvolatile particles only. **Does not** provide protection against vapors or gases. If it becomes difficult to breathe, i.e., a significant increase in the breathing resistance of the respirator is observed, the filters may need to be replaced.

4.2.3 Combination particulate, vapor, and gas-removing cartridge

- **Capabilities** – designed to remove particulate matter, vapors, and gases from air.
- **Limitations** – the limitations of each of the component sections of the combination cartridge, as described above, apply.

4.2.4 Air-Supplied Respirators – air-supplied respirators supply a reliable atmosphere independent of the ambient air to the wearer. There are two types of air-supplied respirators.

- 4.2.5 **Self-Contained Breathing Apparatus (SCBA)** – the wearer carries the supply of air. Air is supplied from a compressed air cylinder through a regulator to a full-face piece. The regulator is equipped with a bypass system that can be used in case of regulator failure to provide emergency escape. The regulator is also equipped with an alarm that signals the wearer when the pressure in the air cylinder is getting low so the wearer may evacuate the hazardous atmosphere.
- 4.2.6 **Cascade Hose-Line Respirator** – respirable air is supplied through a small diameter hose from a series of compressed-air cylinders. The hose is attached to the wearer by a belt, harness or other suitable means and can be detached rapidly in an emergency.

A flow control valve or orifice must be connected to a five-minute (Ska-Pak) egress cylinder that provides for emergency escape from a hazardous atmosphere in the event the primary air supply fails.

A number of workers, each with his own mask, emergency air supply and hose line can be connected to one manifold of compressed air cylinders. The airline system is designed to operate with an inlet supply of 60 -125 psig and with up to 300 feet of hose length per worker is permissible.

To prevent the inadvertent servicing of hose line respirators with something other than breathable air or oxygen, airline couplings must be incompatible with outlets for other gas systems.

Note: **NEVER** use a five-minute (Ska-Pak) egress cylinder without a connection to a primary air supply.

- **Capabilities** – air-supplied respirators provide protection against oxygen deficiency and toxic atmospheres. The breathing atmosphere is independent of the ambient atmospheric conditions. Air-supplied full-face piece respirators provide the greatest amount of respiratory protection available. Cascade Hose-Line Respirator: Compressed air cylinders manifold together and are used as a battery; they can also be exchanged without interrupting the supply of air to the wearer.
- **Limitations** – the period over which a device will provide protection is limited to the amount of air supply that is available.
 - An air-supplied respirator is the safest choice. However, an air-supplied respirator is not to be used in an area that exceeds 10% of the Lower Explosive Limit (LEL).

An air-purifying respirator is not to be used in an area that is Immediately Dangerous to Life and Health (IDLH) or in an area where its maximum use concentrations are exceeded. With the Self-Contained Breathing Apparatus (SCBA) the amount of air in the apparatus limits the length of time the device will provide protection. The chief limitations of the SCBA units are their size, weight, and bulk.

5.0 Training

REPOWER USA employees who may encounter potentially hazardous atmospheres in their day-to-day tasks **SHALL** be trained annually, at the least, or more often, as necessary. **Training will provide the employee with the opportunity to:**

- Handle the respirator.
- Have it fitted properly.
- Test its face piece for face seal.
- Wear it in normal air for a long familiarity period.

Training SHALL as a minimum, include

- The need for respiratory protection.
- Operations instructions for equipment and how to ensure the equipment are in good operating condition.
- Instructions on the fit and the actual use of the equipment to familiarize employees with operating characteristics.
- The capabilities and limitations of respiratory equipment.
- The procedures for proper maintenance, cleaning, and storage.
- **HANDS ON** training exercises for both routine and emergency use.
- Review and ensure understanding of the Occupational Safety and Health Administration (OSHA) Facial Hair Policy.
- Descriptions of the nature of airborne contaminants, which may be present in the employees, work-site.
- The guarantee that each employee who wears Respirator Protection Equipment shall be instructed in the proper cleaning and inspecting of assigned respirators.

Those employees whose exposure potential is no greater than that of the public should receive their Awareness Training of potential respiratory hazards through their Hazard Communication (**HAZCOM**) Training Program.

A Respirator Protection File **SHALL** be maintained at appropriate **REPOWER USA** Office by HSE Manager with copies of pertinent information for work-site requirements retained at the work-site.

"ALL" Confidential Information Will be Maintained in the Employees Medical Files at appropriate office with Human Resource Manager. As outlined in the OSHA Regulations Medical files shall be retained for 30 years after incident.

As a minimum the files must contain the following:

- Written procedures including proper respirator cleaning and maintenance.
- Grade "D" Breathing Air Certificates.
- Employee Training Records.
- Inspection records for respirators intended for Emergency Use.
- Annual evaluations concerning respirator program effectiveness, documenting employee participation.
- A routine Respirator User List.
- List of Respirator uses and the types to be used.

Respirators shall not be worn when conditions prevent a good face seal. Such conditions may include the growth of a beard, sideburns, mustache, facial hair along the sealing area of the respirator, or temple pieces on glasses. In addition, the absence of one or both dentures can seriously affect the fit of a face piece.

The individual diligence of the work force in observing these requirements will be evaluated by periodic checks. To assure the proper protection, each time the wearer puts on the respirator he/she will check the face piece.

Follow the Original Equipment Manufacturer's (OEM) face piece fitting instructions and the following test will help determine if the fit is satisfactory:

5.1 Negative Pressure Test

- Close off the inlet of the filter/cartridge or cover the end of the breathing tubes on the Self-Contained Breathing Apparatus (SCBA) face piece with the palm of your hand.
- To make certain the face piece does not pass air inhale gently so that the face piece collapses slightly.
- Hold your breath for 10 seconds.
- If the face piece remains slightly collapsed and no inward leakage is detected, the respirator fit is satisfactory.

5.2 Positive Pressure Test

- Close off the exhalation valve
- Exhale gently into the face piece
- The fit is considered satisfactory if slightly positive pressure is built up inside the face piece without any evidence of outward leakage.

6.0 Respirator Fit Test

All tight-fitting face piece respirators (which is a respiratory inlet covering that forms a complete seal with the face), including Self-Contained Breathing Apparatus (SCBA) and Air-line Respirators, require a quantitative fit test. Annual re-fit testing is required.

The following items outline the referenced protocols

- The user **SHALL** be allowed to choose the most acceptable respirator from a sufficient number of respirator models and sizes so that the respirator is acceptable to, and correctly fits, the user.
- Prior to the selection process, the user **SHALL** be shown how to put on the respirator, how it should be positioned on the face, how to set strap tension and how to determine an acceptable fit. A mirror **SHALL** be available to assist the user in evaluating the fit and positioning of the respirator. This instruction **SHALL NOT** constitute the user's formal training for respirator use, because it is only a review.
- The user **SHALL** be informed that he/she is being asked to select the respirator that provides the most acceptable fit. Each respirator represents a different size and shape, and, if fitted and used properly, it will provide adequate protection.
- The user **SHALL** be instructed to hold each face piece up to the face and eliminate those that obviously **do not** give an acceptable fit.
- The more acceptable face pieces are noted in case the one selected proves unacceptable; the most comfortable mask is donned and worn for at least five (5) minutes to assess comfort. Assistance in assessing its comfort can be given by discussing the points in the following items. If the user is not familiar with using a particular respirator, the user **SHALL** be directed to don the mask several times and to adjust the straps each time to become adept at setting the proper tension on the straps.
- The assessment of comfort **SHALL** include a review of the following points with the user and allowing the user adequate time to determine the comfort of the respirator:
 - The position of the mask on the nose.
 - Room for eye protection.
 - Room to talk.
 - The position of mask on face and cheeks.
- The assessment of the adequacy of the respirator's fit **SHALL** include a review of the following points with the user and allowing the user adequate time to determine the comfort of the respirator:
 - The chin is properly placed.
 - The fit across the nose bridge.

- Adequate strap tension, not overly tightened.
 - The respirator is of proper size to span the distance from nose to chin.
 - The tendency of the respirator to slip.
 - Self-observation in the mirror to evaluate the respirator's fit and position.
 - The user **SHALL** conduct a user seal check, either the negative or the positive seal checks described in these Policies and Procedures or those recommended by the respirator Original Equipment Manufacturer (OEM) which provide equivalent protection.
 - Prior to conducting the aforementioned test procedures the user will be instructed to seat the mask on his/her face by moving the head from side-to-side and up and down slowly while taking in a few deep breaths. Another face piece **SHALL** be selected and re-tested if the user fails to secure a **good** seal check test.
 - The test **SHALL NOT** be conducted if there is any hair growth between the skin and the face-piece-sealing surface, such as stubble beard growth, a beard, mustache, or sideburns, which cross the respirator sealing surface. Any type of apparel that interferes with a satisfactory fit **SHALL** be altered or removed.
 - If the user exhibits difficulty in breathing during the test he/she **SHALL** be referred to a physician or other licensed health care professional, as appropriate, to determine whether the user can wear a respirator while performing her/his duties.
 - If the user finds the fit of a respirator unacceptable he/she **SHALL** be given the opportunity to select a different respirator and to be re-tested.
- 6.1 Exercise Regimen** – prior to the commencement of the fit test, the user **SHALL** be given a description of the fit test and the user's responsibilities during the test procedure. The description of the process **SHALL** include a description of the test exercises that the user will be performing. The respirator to be tested **SHALL** be worn for at least five (5) minutes before the start of the fit test.
- The fit test **SHALL** be performed while the user is wearing any applicable safety equipment that may be worn during the actual respirator use that could interfere with respirator fit.
- 6.2 Test Exercise** - test exercises are to be performed for all fit testing methods prescribed in this section.
- Normal breathing. In a normal standing position, without talking, the user **SHALL** breathe slowly and deeply taking caution so as not to hyperventilate.
 - Turning head side-to-side. Standing in place, the user **SHALL** slowly turn his/her head from side to side between the extreme positions on each side.

- The head **SHALL** be held at each extreme for a short while so the user can inhale at each side.
- Moving head up and down. Standing in place, the user **SHALL** slowly move his/her head up and down. The user **SHALL** be instructed to inhale in the up position (i.e., when looking toward the ceiling).
- Talking. The user **SHALL** talk aloud slowly and loud enough to be heard clearly by the test conductor. The user can read from a prepared text such as the Rainbow Passage, count backward from one-hundred (100), or recite a memorized poem or song.
- Grimace. The user **SHALL** test this by smiling or frowning.
- Bending over. The user **SHALL** bend at the waist as if he/she were touching their toes.
- Each test exercise **SHALL** be performed for one (1) minute except for the Grimace Exercise, which **SHALL** be performed for fifteen (15) seconds. The user **SHALL** be questioned by the test conductor regarding the comfort of the respirator upon completion of the testing protocol.
- If it has become unacceptable the user **SHALL** try another model of respirator. The respirator **SHALL NOT** be adjusted once the fit test exercises begin. **ANY** adjustment voids the test and the fit test **SHALL** be repeated.

6.3 Quantitative Fit Test Protocol

The following Quantitative Fit Test procedure has been determined as acceptable: Quantitative Fit Testing is done by using controlled negative pressure and the appropriate instrumentation to measure the volumetric leak rate of a face piece to quantify the respirator fit.

The general guidelines outlined in the following procedures **SHALL** be used:

- **REPOWER USA SHALL** ensure that Third Party Administrators and/or the individual persons administering the Quantitative Fit Test are able to calibrate the equipment and perform the tests properly, recognize invalid tests, calculate fit factors properly and ensure that the test equipment is in proper working order.
- **REPOWER USA SHALL** ensure that Third Party Administrators and/or the individual persons administering the Quantitative Fit Test keep equipment clean and maintain and calibrate according to the manufacturer's instructions to operate at the parameters for which it was designed.

6.4 Portacount Fit Test Requirements

- Check the respirator to make sure the sampling probe and line are properly attached to the face piece and that the respirator is fitted with a particulate filter capable of preventing significant penetration by the ambient particles used for the fit test (e.g. NIOSH 42 CFR 84 series 100, series 99 an/or series 95 particulate filter) per the Original Equipment Manufacturer's (OEM) instructions
- Instruct the user to be tested to don the respirator for five (5) minutes prior to the beginning of the fit test. This purges the ambient particles trapped inside the respirator and permits the wearer to make certain the respirator is comfortable. This individual **SHALL** already be trained on how to wear a respirator properly.
- Check the following conditions for the adequacy of the respirator fit.
 - The chin is properly placed.
 - The fit across the nose bridge.
 - Adequate strap tension, not overly tightened.
 - The respirator is of proper size to span the distance from nose to chin.
 - The tendency of the respirator to slip.
 - Self-observation in mirror to evaluate the respirator's fit and position.
- Have the user wearing the respirator do a user seal check. If leakage is detected, determine the cause. If leakage is from a poorly fitting face piece, try another size of the same model respirator or another model of respirator.
- Follow the manufacturer's instructions for operating the Portacount and proceed with the test.
- The user **SHALL** be instructed to perform the Test Exercises identified in the Respirator Fit Test.
- After the test exercises, the user **SHALL** be questioned by the test conductor regarding the comfort of the respirator. If it is deemed unacceptable, another model of respirator **SHALL** be tried.

6.5 Portacount Test Instrument

- The Portacount Instrument will automatically stop and calculate the overall fit factor for the entire set of exercises. The overall fit factor is what counts. The Pass or Fail message will indicate whether the test was successful. If the test was a PASS, the fit test is over.
- Since the **PASS** or **FAIL** criterion of the Portacount is test conductor is programmable, the test conductor **SHALL** ensure that the **PASS** or **FAIL** criterion meets the requirements for minimum respirator performance in this procedure.

A record of the tests **SHALL** be kept on file at the appropriate office of the Human Resource Manager with copies of the pertinent information for work-site requirements retained at the work-site. **ALL CONFIDENTIAL INFORMATION WILL BE MAINTAINED IN THE EMPLOYEES MEDICAL FILES** at the appropriate office of the HSE Manager and the Human Resource Manager. The record **SHALL** contain the user's name; overall fit factor; make, model, style and size of respirator used, and the date tested.

6.6 Cleaning and Disinfecting Respirators

Respirators will be regularly cleaned and disinfected. Those issued for the exclusive use of one worker will be cleaned after each day's use or more often if necessary. Those used by more than one worker will be thoroughly cleaned and disinfected after each use. Each employee who wears Respirator Protection Equipment shall be instructed in the proper cleaning and inspecting of assigned respirators.

6.7 Storage and Inspection

Store in locations that are readily accessible and clearly marked. Store in a manner that protects them from dust, sunlight, heat, extreme cold, excessive moisture or chemicals. Store in a position to prevent the distortion of the rubber or other elastic parts. Do not store in lockers and toolboxes unless protected from the conditions listed above. Store clean respirator face pieces in a clean plastic bag to prevent contamination during storage. Respirators available for emergency use, such as self-contained devices, shall be thoroughly inspected at least once a month and after each use. The inspection for Self-Contained Breathing Apparatus (SCBA) breathing gas pressure will be performed weekly.

Other types of respirators should be inspected before, prior and after each use. Monthly inspections include:

- Check for the tightness of connections.
- Check the operation and condition of head harnesses valves, connecting tubes, regulators, alarms, air cylinders, filters, and cartridges.
- Make repairs as soon as any problems are identified. Send valves, regulators and alarms to the Original Equipment Manufacturer (OEM) for repair.
- Check the Carbon Monoxide monitor for a setting of 10 PPM.

For respirators maintained for emergency use keep a record of the inspection dates, the inspector's initials, and any deficiencies that were observed and corrected in a log (retention - 2 years).

Compressed breathing air cylinders **SHALL** be hydrostatically tested. Breathing air cylinders that have a star (★) or an asterisk (*) stamped into the cylinder collar following the hydro-test date are in compliance for ten (10) years from that date. Typically, the testing of most steel cylinders will be required on a five (5) year interval and lightweight aluminum composite types will be on a three (3) year rotation. **NOTE:** Oxygen is **not to be used** in compressed air units. SCBA regulators should be checked visually and functionally every 2 years by an authorized service center.

6.8 Respirator Preventative Maintenance

Respirators used routinely **SHALL** be inspected prior to and after each use to ensure they are in proper operating condition. Self-Containing Breathing apparatus (SCBA) and other air-supplied respirators for emergency use **SHALL** be inspected monthly to ensure the equipment is properly maintained and ready for use in an emergency. The Original Equipment Manufacturer's (OEM) recommendations for inspection **SHALL** be followed in detail. It is the responsibility of the On-Site Field Supervisor, the On-Site HSE Coordinator or the REPOWER USA Health, Safety and Environmental Manager to ensure the monthly inspections are completed and documented. Maintenance Records **SHALL** be maintained at the work-site with copies maintained at the appropriate office with the Human Resource Manager and the HSE Manager.

Note: ALL RESPIRATORY PROTECTIVE EQUIPMENT FOUND TO BE DEFECTIVE SHALL BE REMOVED FROM SERVICE, TAGGED AND REPAIRED OR REPLACED AS SOON AS POSSIBLE.

6.9 Voluntary Use Respirators

REPOWER USA may provide a respirator at the request of the employee for voluntary use at a specific workplace, provided REPOWER USA does not determine that supplying these respirators within themselves create a hazard. Should REPOWER USA determine that voluntary respirators are permissible REPOWER USA will ensure that any employee using a respirator on a voluntary basis is medically able to use the respirator? **REPOWER USA DOES NOT** permit employees to use personally supplied respirators.

6.10 Facial Hair

REPOWER USA employees **SHALL** adhere to this paragraph if respirators of any type are furnished for the employee's use. This includes **routine users** and personnel who would be expected to use a respirator for emergencies. Federal and/or State laws outline requirements that the employer **SHALL** follow when their employees are required to wear respirators.

All affected individuals working in their facilities **SHALL** be able to obtain an airtight fit for supplied air apparatus or other respirators during “normal” work activities or should an emergency occur. In addition, employees and contractors **SHALL** not have facial hair which passes between the sealing surface of the respirator face piece and their face or which interferes with the functioning of the respirator valves. Facial hair is defined as a beard, a mustache, side burns, a low hairline, bangs, and a stubble growth of beard twenty-four (24) hours old.

7.0 Emergency Rescue Conditions

In a rescue situation, if the possibility of a respiratory hazard is suspected, each rescuer must wear an air-supplied respirator. In areas where the wearer, with the failure of the respirator, could be overcome by a toxic and/or oxygen-deficient atmosphere, at least one additional person must be present. Communications (visual, voice or signal line) must be maintained between both or all individuals present. Planning must be such that one individual will be unaffected by any likely incident and is trained in the use of the proper rescue equipment available to assist the other(s) in case of emergency. The individual **SHALL** be trained in the proper procedures to send out an alarm, calling for the assistance of individuals that are properly trained, and have the necessary equipment available. Only a rescuer using air-supplied respirators in an “Immediate Danger to Life or Health” (IDLH) atmosphere is approved to enter a rescue zone.

8.0 Recordkeeping

REPOWER USA shall maintain a written record of the training, medical evaluations, fit testing, safety drills, inspections, tests, and any maintenance applicable to **REPOWER USA** Respiratory Program. All Records shall be maintained in accordance with existing state and federal regulations. **REPOWER USA HSE Manager** and Human Resource Manager **SHALL** maintain these records in the appropriate required files in accordance with existing state and federal regulations. This information is available to the appropriate client and employee authorized representatives and regulatory agencies upon request.



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Section III 7.1.5 RPSHSE - 5 Personal Protective Equipment (PPE)

Form 1

NO FORMS APPLICABLE

LEFT BLANK FOR FUTURE
INSERTATION AS
APPLICABLE

TRAINING WILL ADDRESS THIS GROUP

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Section III

7.1.5 A RPSHSE – 5 A

Respiratory Protection

Form 1 – Annual Respiratory Program Evaluation Checklist

Annual Respirator Program Evaluation Checklist

In general, the respiratory program will be evaluated and documented annually. Program adjustments will be made to reflect the evaluation results. As part of the Program Evaluation **REPOWER USA** employees shall be contacted about fit, selection, proper use, maintenance and their opinions about the **REPOWER USA** Respiratory Program effectiveness.

A. Program Administration

- ☐ Is there a written policy that acknowledges employer responsibility for providing a safe and healthful workplace?
- ☐ Is there a written program that assigns program responsibility, accountability, and authority?
- ☐ Is program responsibility vested in one or two individuals?
- ☐ Is the program administrator knowledgeable about respirators and the program?
- ☐ Can the administrator coordinate all aspects of the program at the job site?
- ☐ Can realistic engineering controls or work practices eliminate the need for respirators?
- ☐ Are there written procedures/statements covering the various aspects of the respirator program, including:
 - ☐ Designation of an administrator?
 - ☐ Respirator selection (including purchase of MSHA/NIOSH certified equipment)?
 - ☐ The medical aspects of respirator usage?
 - ☐ The issuance of equipment, fitting, training?
 - ☐ The maintenance, storage and repair of respirators?
 - ☐ The inspection and use under special conditions?
 - ☐ Work area surveillance?

B. Program Operation**Respiratory Protective Equipment Selection**

- ☐ Are work area conditions and worker exposures properly surveyed?
- ☐ Are respirators selected based on the actual hazards to which the worker is exposed?
- ☐ Are only certified respirators purchased and used?
- ☐ Do the respirators provide adequate protection for the specific hazard?
- ☐ Are the respirators effective for the concentration levels of the contaminant?
- ☐ Have the prospective users been medically evaluated?
- ☐ Did the medical evaluation of each user include the user's physical and psychological ability to wear the selected respiratory protective equipment?
- ☐ Have respirators been issued to the users for their exclusive use?
- ☐ Are there records covering the issuance of the respirators?

Respiratory Protective Equipment Fitting

- ☐ Is each user given the opportunity to try on several respirators to determine whether the respirator he/she will be wearing is the best fitting one?
- ☐ Is the fit of the respirator tested at appropriate intervals?
- ☐ Are those users who require corrective lenses properly fitted?
- ☐ Is the face piece to face seal tested in a test atmosphere?
- ☐ Are workers prohibited from wearing respirators in contaminated work areas if they have facial hair or other characteristics that may cause face-seal leakage?

B. Program Operation (Continued)**Respirator Use In the Work Area**

- ☐ Are the respirators being worn correctly?
- ☐ Are the workers keeping the respirators on all the time while in the work area?

Cleaning and Disinfecting

- ☐ Are the respirators cleaned and disinfected after each use when several people use the same device?
- ☐ Are the respirators issued to individual users cleaned as frequently as necessary?
- ☐ Are the proper cleaning and disinfecting methods utilized?

Storage

- ☐ Are respirators stored in a manner that protects them from
 - ☐ Dust?
 - ☐ Sunlight?
 - ☐ Heat?
 - ☐ Excessive Cold?
 - ☐ Moisture?
 - ☐ Damaging Chemicals?
- ☐ Are the respirators stored in a storage facility in a way to prevent them from becoming deformed?
- ☐ Is storage in lockers or toolboxes permitted only if the respirator is in its own carrying case or carton?

Inspection

- ☐ Are the respirators inspected before and after each use?
- ☐ Are the respirators inspected during cleaning?
- ☐ Are qualified individuals instructed in inspection techniques?
- ☐ Is the respiratory protective equipment designated for emergency use inspected at least once a month?
- ☐ Are SCBA breathing gas containers inspected weekly for breathing gas pressure?
- ☐ Is a record kept of the inspection of emergency use respiratory protective equipment?

Repair

- ☐ Are the replacement parts used to repair respirators made by the manufacturer of the respirator?
- ☐ Are repairs made by that manufacturer or by manufacturer-trained technicians?

Special Use Conditions

- ☐ Is there a procedure for using respiratory protective equipment in atmospheres that are Immediately Dangerous to Life or Health (IDLH)?
- ☐ Is a procedure available for using equipment to enter into confined spaces?

Training

- ☐ Are users trained in proper respirator use, cleaning, and inspection?
- ☐ Are users trained in the basis for selecting respirators?
- ☐ Is a competency-based evaluation of users made before and after training?



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Respiratory Protection

Form 2 - Respirator Inspection Record



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Respirator Inspection Record

1. Type: _____
2. Number: _____
3. Defects Found:
 - _____ Face-Piece
 - _____ Inhalation Valve
 - _____ Exhalation Valve Assembly
 - _____ Headbands
 - _____ Cartridge Holder
 - _____ Cartridge Canister
 - _____ Filter
 - _____ Harness Assembly
 - _____ Hose Assembly
 - _____ Speaking Diaphragm
 - _____ Gaskets
 - _____ Connections
 - _____ Other Defects

Section III

7.1.5 A RPSHSE – 5 A

Respiratory Protection

Form 3 – Respiratory Medical Questionnaire

Respiratory Medical Questionnaire**Section I – Part A**

1. Name: _____
2. Date: _____
3. Age: _____
4. Gender: M ____ F ____ (indicate one choice)
5. Height: ____ ft. ____ in.
6. Weight: _____ pounds
7. Job title: _____
8. Current Telephone Number: _____ Residence _____ Work _____
(This number is very important for the physician and or licensed health care professional to contacts you for review of the Respiratory Medical Questionnaire)
9. Best time to contact you at your residence phone: ____ a.m. ____ p.m.
(Make note of the most appropriate time to contact you)
10. Have you been informed about how to contact the physician and or licensed health care professional who will review the questionnaire? ____ YES ____ NO
11. Check the type of respirator you will be using.
(a.) N ____ R ____ P ____ (You can check more than one category)
Disposable respirator (filter mask, non-cartridge type only).
(b.) Other: _____
{Other type (for example, half or full face-piece type, powered air purifying, supplied air, self-contained breathing apparatus (SCBA))}
12. Have you worn a respirator? ____ YES ____ NO
(Indicate one choice)
13. If your answer to Question #12 is "YES", what type(s): _____

Section II – Part A

1. Do you currently smoke tobacco,
or have you smoked tobacco in the last month? YES ____ NO ____
2. Have you had any of the following conditions? (indicate each condition that is applicable to you)
(a.) Seizures: ____ Y ____ N (b.) Diabetes (sugar disease): ____ Y ____ N
(c.) Allergic reaction: ____ Y ____ N (d.) Trouble smelling odors: ____ Y ____ N
(that interferes with your breathing) (e.) Claustrophobia ____ Y ____ N
(Fear of closed places)
3. Have you ever had any of the following pulmonary or lung problems?
(1.) Asbestos: ____ (2.) Asthma: ____ (3.) Chronic bronchitis: ____
(4.) Emphysema: ____ (5.) Pneumonia: ____ (6.) Tuberculosis: ____
(7.) Silicosis: ____ (8.) Pneumothorax (collapsed lung): ____
(9.) Lung Cancer: ____ (10.) Broken Ribs: ____
(11.) Any chest injuries or surgeries: ____
(12.) Any other lung problems that you have been told about: ____
4. Do you currently have any of the following symptoms of pulmonary or lung illness?
(a.) Shortness of breath: ____ YES ____ NO (b.) Wheezing: ____ YES ____ NO
(c.) Shortness of breath when walking fast on level ground
or walking up a slight hill or incline: ____ YES ____ NO
(d.) Shortness of breath when walking with other people
at an ordinary pace on level ground: ____ YES ____ NO
(e.) Shortness of breath when washing or dressing yourself: ____ YES ____ NO
(f.) Shortness of breath that interferes with your job: ____ YES ____ NO
(g.) Coughing that produces phlegm (thick sputum): ____ YES ____ NO
(h.) Coughing that wakes you early in the morning: ____ YES ____ NO

Section II – Part A (Continued)

- (i.) Coughing that occurs mostly when you are lying down: ☐ YES ☐ NO
- (j.) Coughing up blood within the last month: ☐ YES ☐ NO
- (k.) Wheezing that interferes with your job: ☐ YES ☐ NO
- (l.) Have you stopped for breath when walking at your own pace on level ground: ☐ YES ☐ NO
- (m.) Chest pains when you breathe deeply: ☐ YES ☐ NO
- (n.) Any symptoms that you think may be related to lung problems: ☐ YES ☐ NO
5. Have you ever had any of the following cardiovascular or heart problems?
- (a.) Heart attack: ☐ YES ☐ NO (b.) Stroke: ☐ YES ☐ NO
- (c.) Angina: ☐ YES ☐ NO (d.) Heart Failure: ☐ YES ☐ NO
- (e.) High blood pressure: ☐ YES ☐ NO
- (f.) Swelling in your legs or feet (not caused by walking): ☐ YES ☐ NO
- (g.) Heart arrhythmia (heart beating irregularly): ☐ YES ☐ NO
- (i.) Any other heart problems that you've been told about: ☐ YES ☐ NO
5. Have you ever had any of the following cardiovascular or heart symptoms?
- (a.) Frequent pain or tightness in your chest: ☐ YES ☐ NO
- (b.) Pain or tightness in your chest during physical activity: ☐ YES ☐ NO
- (c.) Pain or tightness in your chest that interferes with your job: ☐ YES ☐ NO
- (d.) In the past two years, have you noticed your heart skipping: ☐ YES ☐ NO
6. Do you currently take medication for any of the following problems?
- (a.) Breathing or Lung problems: ☐ YES ☐ NO (b.) Heart Trouble: ☐ YES ☐ NO
- (c.) Blood Pressure: ☐ YES ☐ NO (d.) Seizures: ☐ YES ☐ NO
7. If you have used a respirator, have you ever had any of the following problems? (If you have never used a respirator, check the following spaces NO and go to question #8.)
- (a.) Eye irritation: ☐ YES ☐ NO (b.) Skin allergies or rashes: ☐ YES ☐ NO
- (c.) Anxiety: ☐ YES ☐ NO (d.) General weakness or fatigue: ☐ YES ☐ NO
- (e.) Any other problem that interferes with your use of a respirator: ☐ YES ☐ NO
8. Would you like to talk to the physician and or the licensed health care professional who will review the medical questionnaire about your answers on this questionnaire? ☐ YES ☐ NO
9. Have you ever lost vision in either eye (temporarily or permanently): ☐ YES ☐ NO
10. Do you currently have any of the following vision problems?
- (a.) Wear contact lenses: ☐ YES ☐ NO (b.) wear glasses: ☐ YES ☐ NO
- (c.) Color Blind: ☐ YES ☐ NO
- (d.) Any other eye or vision problems: ☐ YES ☐ NO
11. Have you ever had an injury to your ears, including a broken ear drum: ☐ YES ☐ NO
13. Do you currently have any of the following hearing problems?
- (a.) Difficulty with hearing: ☐ YES ☐ NO
- (b.) Wearing a hearing aid: ☐ YES ☐ NO
- (c.) Any other hearing or ear problems: ☐ YES ☐ NO
14. Have you had a back injury? ☐ YES ☐ NO
15. Do you currently have any of the following musculoskeletal problems?
- (a.) Weakness in any of your arms, hands, legs or feet: ☐ YES ☐ NO
- (b.) Difficulty climbing a flight of stairs or a ladder carrying more than 25 lbs.: ☐ YES ☐ NO
- (c.) Difficulty fully moving your arms or legs: ☐ YES ☐ NO
- (d.) Pain or stiffness when you lean forward or backward at the waist: ☐ YES ☐ NO
- (e.) Difficulty bending your knees: ☐ YES ☐ NO (f.) Back pain: ☐ YES ☐ NO
- (g.) Difficulty fully moving your head from side to side: ☐ YES ☐ NO
- (h.) Difficulty squatting to the ground: ☐ YES ☐ NO
- (i.) Difficulty fully moving your head up or down: ☐ YES ☐ NO
- (j.) Any other muscle or skeletal problems that interferes with using a respirator: ☐ YES ☐ NO



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Section II – Part A (Continued)

16. How often are you expected to use the respirator(s)? Place an "X" in the proper blank for all items that apply to you.
- (a.) Escape only (no rescue): ☐ YES ☐ NO
 - (b.) Emergency rescue only: ☐ YES ☐ NO
 - (c.) Less than 5 hours per week: ☐ YES ☐ NO
 - (d.) Less than 3 hours per day: ☐ YES ☐ NO
 - (e.) 2 to 4 hours per day: ☐ YES ☐ NO
 - (f.) Over 4 hours per day: ☐ YES ☐ NO

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Section III

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Respiratory Protection

Form 4 – Pre-screening Questionnaire

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Pre-screening Questionnaire

To be completed by Certified Spirometry Technician Prior to Testing:

Full Name: _____

(Last)

(First)

(Middle)

Social Security Number: _____

Spirometry Questionnaire

YES	NO	QUESTIONS
		1.) In the last 6 weeks have you had major surgery or been hospitalized for a heart attack? If Yes: (Do not test at this time. Reschedule for test in 6 weeks).
		2.) Are you under a physician's care for high blood pressure? (If blood pressure exceeds action level, obtain physicians clearance.)
		3.) Within the last hour have you smoked tobacco?
		4.) Within the last hour have you eaten a full meal? (If yes to either smoking or eating, wait one hour before testing.)
		5.) Have you had a respiratory infection (such as flu, pneumonia or a chest cold) in the last 3 weeks?
		6.) Have you used an inhaled bronchodilator (Primatene Mist, Ventolin, etc.) in the last 6 hours?
		7.) Have you had more than 2 cups of caffeinated coffee, tea or cola (total) in the last 6 hours? (If yes, wait 1 hour before testing) Complete the present in progress spirometry test and reschedule to retest in 6 weeks.
		8.) Are you wearing any tight or restrictive clothing?
		9.) Are you wearing Dentures?

Today is Measurements

Height: _____ Inches (Measured by Tape)

Weight: _____ Pounds (Measured by scale)

(NOTE: If measurements falls exactly on the half inch or half pound, odd numbers round down and even numbers round up respectively)

The certified spirometry technician should initial and date this form, then proceed to questionnaire and spirometry testing.

Certified Spirometry Technician's initials: _____

Date: _____



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Respiratory Protection

Form 5 – Respiratory Compliance Letter



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Respiratory Compliance Letter

Name of Testing facility: _____

Address of Testing facility: _____

Contact Numbers of testing facility: _____

Name of Employer: **REPOWER Systems USA** _____

Name of Employee: _____

Date of Examination: _____

To Whom it May Concern:

This letter is in accordance with the Occupational Safety & Health Administration (OSHA) Respirator Standard (29 CFR 1910.134) which states that employees shall not be assigned to jobs which require the use of a respirator unless they have been medically cleared to use such equipment.

The cardio-pulmonary status of the employee named above has been evaluated and in my opinion,

(He: _____ She: _____), (May: _____ May Not: _____)

engage in duties where the use of respiratory equipment is required.

Sincerely:

Signature of Examining Physician

Date of Examination



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Respiratory Protection

Form 6 - Employee Physical Limitation Form



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Employee Physical Limitation Form

Name of testing facility: _____

Address of testing facility: _____

Contact Numbers of testing facility: _____

Respiratory Compliance Letter

Name of Employer: **REPOWER Systems USA** _____

Name of Employee: _____

Date of Examination: _____

To Whom it May Concern:

This letter is in accordance with the Occupational Safety & Health Administration (OSHA) Respirator Standard (29 CFR 1910.134) which states that employees shall not be assigned to jobs which require the use of a respirator unless they have been medically cleared to use such equipment.

The physical limitation status of the employee named above has been evaluated and in my opinion,

(He: _____ She: _____), (May Not: _____)

engage in duties where the use of respiratory equipment is required due to physical limitations as listed below.

The physical limitation(s) are: _____

Sincerely:

Signature of Examining Physician

Date of Examination