

POLICY

Hawk Energy, LLC has implemented this policy to ensure proper safe work practices and procedures are followed for the protection of our employees against fire/explosion hazards. The following work practices, procedures, and engineering controls will be enforced as an integral part of our Company safety policy.

RESPONSIBILITIES

David Slim is designated as the supervisor to manage the Fire Prevention Program. Hawk Energy, LLC will have and maintain an employee alarm system. The employee alarm system will use a distinctive signal for each purpose. David Slim will ensure that all employees are informed and trained in the following minimum elements for Emergency Action Plans:

- David Slim will ensure all employees are trained in the proper operation of all types of fire extinguishers provided by the company.
- As warranted by the project, Hawk Energy, LLC will provide a trained and equipped organization (Fire Brigade) to assure adequate protection to life.
- Procedures for reporting a fire or other emergency.
- Procedures for emergency evacuation for all areas of work, including type of evacuation and exit route assignments.
- Safe assembly areas designated for all work areas in the event of evacuation.
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate.
- Procedures to account for all employees after evacuation.
- Procedures to be followed by employees performing rescue or medical duties.
- The members in the chain of command who may be contacted by employees who need more information or an explanation of their duties under the emergency action plan.
- All materials will be stored, handled, and piled with regard to their fire characteristics.

TRAINING

Hawk Energy, LLC will designate and train employees to assist in the safe and orderly evacuation of other employees.

David Slim will review the Fire Prevention Plan with each employee covered by the plan: when each plan is developed or an employee is initially assigned to a job; when the employee's responsibilities under the plan change; when any element of the plan is changed.

Fire Protection/Prevention training will be required on initial hiring and annually thereafter. Employees will be trained in fighting class A, B, C, D, and K fires using the PASS method.

All employees will be trained in the hazards involved in using fire extinguishers for incipient stage firefighting and escape purposes. Employees are instructed to ensure the local Emergency Medical Service (EMS), a fire department, is notified before attempting to extinguish any fire and that if a fire is not immediately extinguished using one fire extinguisher, or the fire recurs, to evacuate immediately.

Where the employer has provided portable fire extinguishers for employee use in the workplace, the employer will also provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting.

The employer will provide training upon initial employment and at least annually thereafter.

SAFE PRACTICES

The employer will assure that portable fire extinguishers are subjected to monthly checks and an annual maintenance check. The employer will record the annual maintenance date and retain this record for one (1) year after the last entry of life of the shell, whichever is less. The record will be made available to the Assistant Secretary upon request.

All fire extinguishers and firefighting equipment will be inspected by David Slim on a monthly basis; this inspection will be recorded and documented, with the required annual maintenance check. Defective equipment will be replaced immediately. Records of inspection will be kept on file in the office.

Procedures are instructions for accomplishing specific tasks. Emergency procedures are important because they tell employees exactly what to do to ensure their safety during an emergency to accomplish each of the following tasks:

- Report emergencies to local fire and police departments.
- Inform the emergency chain of command of an emergency.
- Warn employees about an emergency.
- Conduct an orderly, efficient workplace evacuation.
- Assist employees with disabilities or injuries during an evacuation.
- Shut down critical equipment, operate fire extinguishers, and perform other essential services during an evacuation. Account for employees at a designated safe area after an evacuation
- Perform rescue and first aid that may be necessary during an emergency.

FIRE CLASSES

Not all fires are the same. Different fuels create different fires and require different types of fire extinguishing agents. The fire types are listed below:

- Class A – Ordinary combustibles such as wood, paper, cloth, trash, and plastics.
- Class B – Flammable liquids such as gasoline, petroleum oil, and paint. Also includes flammable gasses such as propane and butane.
 - Class B does NOT include fires involving cooking oils and grease.
- Class C – Energized Electrical Equipment such as motors, transformers, and appliances.
 - If the power is removed, Class C fires become one of the other classes of fire.
- Class D – Combustible metals such as potassium, sodium, aluminum, and magnesium.
- Class K – Cooking oils and grease such as animal fats and vegetable fats.

SELECTION AND DISTRIBUTION

Portable fire extinguishers will be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of hazard which would affect their use.

Hawk Energy, LLC will distribute portable fire extinguishers for use by employees on Class A fires so that the travel distance for employees to any extinguisher is 75 feet (22.9 m) or less.

Hawk Energy, LLC may use uniformly spaced standpipe systems or hose stations connected to a sprinkler system installed for emergency use by employees instead of Class A portable fire extinguishers, provided that such systems meet the respective requirements of 1910.158 or 1910.159, that they provide total coverage of the area to be protected, and that employees are trained at least annually in their use.

Hawk Energy, LLC will distribute portable fire extinguishers for use by employees on Class B fires so that the travel distance from the Class B hazard area to any extinguisher is 50 feet (15.2 m) or less.

Hawk Energy, LLC will distribute portable fire extinguishers used for Class C hazards on the basis of the appropriate pattern for the existing Class A or Class B hazards.

Hawk Energy, LLC will distribute portable fire extinguishers or other containers of Class D extinguishing agent for use by employees so that the travel distance from the combustible metal working area to any extinguishing agent is 75 feet (22.9 m) or less. Portable fire extinguishers for Class D hazards are required in those combustible metal working areas where combustible metal powders, flakes, shavings, or similarly sized products are generated at least once every two weeks.

INSPECTION, MAINTENANCE, AND TESTING

David Slim will be responsible for the inspection, maintenance and testing of all portable fire extinguishers in the workplace.

Portable extinguishers or hose used in lieu thereof will be visually inspected monthly.

Hawk Energy, LLC will assure that:

- Portable fire extinguishers are subjected to an annual maintenance check. Stored pressure extinguishers do not require an internal examination. The employer will record the annual maintenance date and retain this record for one year after the last entry or the life of the shell, whichever is less. The record will be available to the Assistant Secretary upon request.
- Stored pressure dry chemical extinguishers that require a 12-year hydrostatic test are emptied and subjected to applicable maintenance procedures every six (6) years. Dry chemical extinguishers having non-refillable disposable containers are exempt from this requirement. When recharging or hydrostatic testing is performed, the 6-year requirement begins from that date.
- Alternate equivalent protection is provided when portable fire extinguishers are removed from service for maintenance and recharging.

Hydrostatic Testing

Hawk Energy, LLC will assure that hydrostatic testing is performed by trained persons with suitable testing equipment and facilities.

Hawk Energy, LLC will ensure that portable extinguishers are hydrostatically tested at the intervals listed in the table below, except under any of the following conditions:

- When the unit has been repaired by soldering, welding, brazing, or the use of patching compounds.
- When the cylinder or shell threads are damaged.
- When there is corrosion that has caused pitting, including corrosion under the removable name plate assemblies.
- When the extinguisher has been burned in a fire; or
- When a calcium chloride extinguishing agent has been used in a stainless-steel shell.

In addition to an external visual examination, the employer will assure that an internal examination of cylinders and shells to be tested is made prior to the hydrostatic tests.

Type of Extinguishers	Test Interval (Years)
Soda Acid (Soldered Brass Shells) (until January 1, 1982)	(1)
Soda Acid (Stainless Steel Shells)	5
Cartridge Operated Water and/or Antifreeze	5
Stored Pressure Water and/or Antifreeze	5
Wetting Agent	5
Foam (Soldered Brass Shells) (January 1, 1982)	(1)
Foam (Stainless Steel Shells)	5
Aqueous film forming foam (AFFF)	5
Loaded Steam	5
Dry Chemicals with Stainless Steel	5
Carbon Dioxide	5
Dry chemical, Stored Pressure, with Mild Steel, Brazed Brass, or Aluminum Shells	12
Dry chemical, Cartridge or Cylinder Operated, with Mild Steel Shells	
Halon 1211	12
Halon 1301	
Dry Powder, Cartridge, or Cylinder Operated with Mild Steel Shells	12
	1212

Extinguishers having shells constructed of copper or brass joined by soft solder or rivets will not be hydrostatically tested and will be removed from service by January 1, 1982; (Not permitted).

Hawk Energy, LLC will assure that:

- Portable fire extinguishers are hydrostatically tested whenever they show new evidence of corrosion or mechanical injury, except under the conditions listed in paragraphs (f)(2)(i)-(v) of this section.
- Hydrostatic tests are performed on extinguisher hose assemblies which are equipped with a shut-off nozzle at the discharge end of the hose. The test interval will be the same as specified for the extinguisher on which the hose is installed.

- Carbon dioxide hose assemblies with a shut-off nozzle are hydrostatically tested at 1,250 psi (8,620 kPa).
- Dry chemical and dry powder hose assemblies with a shut-off nozzle are hydrostatically tested at 300 psi (2,070 kPa).

Hose assemblies passing a hydrostatic test do not require any type of recording or stamping. Hawk Energy, LLC will assure that:

- Hose assemblies for carbon dioxide extinguishers that require a hydrostatic test are tested within a protective cage device.
- Carbon dioxide extinguishers and nitrogen or carbon dioxide cylinders used with wheeled extinguishers are tested every five (5) years at 5/3 of the service pressure as stamped into the cylinder. Nitrogen cylinders which comply with 49 CFR 173.34(e)(15) may be hydrostatically tested every ten (10) years.
- All stored pressure and Halon 1211 types of extinguishers are hydrostatically tested at the factory test pressure not to exceed two (2) times the service pressure.
- Acceptable self-generating type soda acid and foam extinguishers are tested at 350 psi (2,410 kPa).

Air or gas pressure may not be used for hydrostatic testing.

Extinguisher shells, cylinders, or cartridges which fail a hydrostatic pressure test, or which are not fit for testing will be removed from service and from the workplace.

The equipment for testing compressed gas-type cylinders will be of the water jacket type. The equipment will be provided with an expansion indicator which operates with an accuracy within one percent of the total expansion or 0.1 cc (.1mL) of liquid.

The equipment for testing non-compressed gas-type cylinders will consist of the following:

A hydrostatic test pump, hand or power operated, capable of producing not less than 150 percent of the test pressure, which will include appropriate check valves and fittings.

A flexible connection for attachment to fittings to test through the extinguisher nozzle, test bonnet, or hose outlet, as is applicable; and

A protective cage or barrier for personal protection of the tester, designed to provide visual observation of the extinguisher under test.

Hawk Energy, LLC will maintain and provide upon request to the Assistant Secretary evidence that the required hydrostatic testing of fire extinguishers has been performed at the time intervals shown in the table above. Such evidence will be in the form of a certification record which includes the date of the test, the signature of the person who performed the test, and the serial number or other identifier, of the fire extinguisher that was tested. Such records will be kept until the extinguisher is hydrostatically retested at the time interval specified in the table above or until the extinguisher is taken out of service, whichever comes first.

