POLICY

E & B Oilfield Services Inc. has implemented this policy to ensure no employee is exposed to Hazardous Waste material at levels in excess of permissible exposure limits (PEL). Kirk Duncan is responsible for enforcing this policy.

TRAINING

All employees working on site exposed to hazardous substances, health or safety hazards and their supervisors responsible for the site will be trained before starting hazardous waste work. Kirk Duncan is the assigned supervisor responsible for ensuring all employees receive the required training and certification required by OSHA regulations. All employees will receive review training as required.

Employees will not be permitted to participate in or supervise field activities until they have been trained to a level required by their job function and responsibility.

The training will thoroughly cover the following:

- Names of employees and alternates responsible for site safety and health.
- Safety, health and other hazards present on the site.
- Use of personal protective equipment (PPE).
- Work practices by which employees can minimize risks from hazards.
- Safe use of engineering controls and equipment on the site.
- Medical surveillance requirements.
- The contents of the site safety and health plan.

E & B Oilfield Services Inc. employee training will be based on the duties and function to be performed by each employee responder. The skill and knowledge levels required for all new responders will be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Employees who participate or are expected to participate, in emergency response, will be given the following training:

First Responders at the Awareness Level – are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release.

First Responders at the Operations Level – receive eight (8) hours training or have had sufficient experience to demonstrate competency in areas of responding to releases or potential releases of hazardous substance, to protect nearby persons, property or the environment from the effects of the release. Their function is to contain the release from a safe distance and help keep it from spreading. Training certification is required.

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- Hazardous Materials Technicians – receive 24 hours of training equal to first responder operations level with knowledge of how to implement emergency response plan, know the classification, identification and verification of known or unknown substances, functions within an assigned role in the Incident Command System (ICS), how to select and use of proper PPE, perform advanced containment, and understands decontamination and toxicology. Training certification is required.
- Hazardous Materials Specialist – in addition to the 24 hours of training for the technical level, the specialist will be able to develop a site safety and control plan. Training certification is required.
- On-Scene Incident Commander – is required to have at least 24 hours of training equal to the first responder operations level. This employee knows how to implement the program and system, PPE, hazard risks, state and Federal regulations and decontamination. Training certification is required.
- Trainers – who teach any of the above training subjects will have satisfactorily completed a training course for teaching the subjects they are expected to teach, such as the courses offered by the U.S. National Fire Academy or they will have the training and/or academic credentials and instructional experience necessary to demonstrate competent instructional skills and a good command of the subject matter of the courses they are to teach.
- Refresher Training – Employees trained in accordance with this plan will receive an annual refresher training. A record of the methods used will be maintained.

Initial Training

- E & B Oilfield Services Inc. employees engaged in hazardous substance removal or other activities that expose or potentially expose, employees to hazardous substances and health hazards will receive a minimum of 40 hours of instruction off the site and a minimum of three (3) days actual field experience under the direct supervision of a trained, experienced supervisor.
- Company employees on site only occasionally for a specific limited task and who are unlikely to be exposed over published exposure limits will receive a minimum of 24 hours of instruction off the site and the minimum of one (1) day actual field experience under the direct supervision of a trained, experienced supervisor.
- Company employees who regularly work in areas on site that have been monitored and cleared, indicating that exposures are under published exposure limits, where respirators are not necessary and monitoring results indicate that there are no health hazards or the possibility of an emergency developing, will receive a minimum of 24 hours of instruction off the site and the minimum of one (1) day actual field experience under the direct supervision of a trained, experienced supervisor.
- Employees with 24 hours of training who become general site employees or who are required to wear respirators, will have the additional 16 hours and two (2) days of training necessary to total the required training.

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Supervisor Training

On-site supervisors who are directly responsible for or who supervise employees engaged in, hazardous waste operations will receive 40 hours of initial training and three (3) days of supervised field experience. Additionally, supervisors will receive at least eight (8) additional hours of specialized training upon job assignment, covering topics such as the Company's safety and health program, PPE program, spill containment program and health hazard monitoring procedures and techniques.

Qualifications for Trainers

Company trainers are qualified to instruct employees about the subject matter they are teaching. Such trainers have satisfactorily completed a training program for teaching the subjects they teach or they have the academic credentials and instructional experience necessary for teaching the subjects.

Training Certification

Company employees that have successfully completed the training and field experience required are certified by their instructor and field-training supervisor as having completed the necessary training. A written certificate is given to each employee who has completed training. Any employee who is not certified or who does not meet the above stated requirements, is prohibited from engaging in hazardous waste operations.

Emergency Response

Employees who are engaged in responding to emergencies at hazardous waste sites that may expose them to hazardous substances are trained in how to respond to such expected emergencies.

Refresher Training

All employees will receive eight (8) hours of annual refresher training consisting of any critique of incidents that have occurred in the past year that can serve as training examples of related work, as well as other relevant topics.

Equivalent Training

Employers who can demonstrate through documentation or certification that an employee's work experience and/or training has met the equivalent of the required initial training will not need to provide it. Equivalent training may include academic coursework or prior from actual hazardous waste site experience. E & B Oilfield Services Inc. will provide a copy of the certification or documentation to our employees upon request.

All employees new to the site will receive appropriate, site-specific training and supervised field experience before entering the new site.

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HAZWOPER (EMERGENCY RESPONSE)

An emergency response plan will handle anticipated emergencies before beginning emergency response operations. The plan is in writing and available for inspection by employees, their representatives and OSHA.

Elements of the E & B Oilfield Services Inc. Emergency Response Plan include:

- Pre-emergency planning and coordination with outside parties.
- Employees roles, lines of authority, training and communications.
- Emergency recognition and prevention.
- Safe distances and places of refuge.
- Site security and control.
- Evacuation routes and procedures.
- Decontamination.
- Emergency medical treatment procedures.
- Emergency alerting and response procedures.
- Critiques of response and clean up.
- PPE and emergency equipment.
- Use of local or state emergency plans to avoid duplications.

The senior official responding to an emergency will become the individual in charge of a site-specific ICS for controlling the operations at the site. Initially it is the senior officer on the first-due piece of responding emergency apparatus to arrive on the incident scene. As more senior officers arrive (i.e., battalion chief, fire chief, state law enforcement official, site coordinator, etc.) the position is passed up the line of authority which has been previously established.

The person in charge of the ICS will:

- Identify hazardous substances or conditions present.
- Implement appropriate emergency operations and assure that PPE is worn.
- Limit the number of emergency response employees at that site to those who are actively performing emergency operations.
- Designate a safety officer with specific responsibility to identify and evaluate hazards and to provide direction.
- Begin decontamination procedures after emergency operations have terminated.

Emergency response employees with signs or symptoms that may be from exposure to hazardous substances during an emergency will be provided with medical consultation.

Specific requirements for chemical protective clothing/equipment to be used by hazardous material specialists are found in §1910.120 – Appendix B.

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Post-Emergency Response Operations

Upon completion of the emergency response, if it is necessary to remove hazardous substances, health hazards and materials contaminated with them (such as contaminated soil or other elements of the natural environment) from the site of the incident, E & B Oilfield Services Inc. or the responsible party conducting the clean-up, will meet all the requirements of OSHA 1910.120 – HAZWOPER, paragraphs (b) through (o).

HAZWOPER (RESOURCE CONSERVATION AND RECOVERY ACT (RCRA))

- The written Safety and Health Program for our employees identifies, evaluates, controls safety and health hazards and provides for emergency response. The program details a specific chain of command, addresses tasks and objectives of the operations and addresses site-specific procedures.
- The Medical Surveillance Program is provided to E & B Oilfield Services Inc. employees at no cost. Employees who may be exposed to health hazards for 30 days or more a year or wear a respirator 30 or more days a year are covered under the Medical Surveillance Program. The Medical Surveillance Program also covers employees who are injured or develop symptoms due to exposure to hazards. Members of Company Hazardous Materials (HAZMAT) teams are also be covered by the Medical Surveillance Program.
- Engineering controls, safe practices and PPE with proper fitting will be used to reduce and maintain employee exposures below the PEL established by OSHA. Feasible engineering controls include the use of pressurized cabs or control booths on equipment and/or the use of remotely operated material handling equipment.
- Air monitoring is used to identify and qualify airborne levels of hazardous substances. The monitoring will address initial entry, periodic monitoring, possible Immediately Dangerous to Life and Health (IDLH) conditions and wherever exposure may be a possibility. The task-specific conditions, duration and the hazards and potential hazards will be identified, including a guide for PPE assessment.
- Decontamination procedures are developed, communicated to employees and implemented before any employees or equipment may enter areas on site where potential for exposure to hazardous substances exists. The procedures minimize employee contact with hazardous substances or with equipment that has contacted hazardous substances.
- All Company employees leaving a contaminated area will be appropriately decontaminated. All contaminated clothing and equipment leaving a contaminated area will be appropriately disposed of or decontaminated.
- Decontamination procedures will be monitored by the site Safety and Health Supervisor to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps will be taken to correct any deficiencies.
- Decontamination will be performed in geographical areas that will minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment.
- PPE and equipment will be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness. Employees whose non-impermeable clothing becomes wetted with hazardous substances, will immediately remove that clothing, and proceed to shower. The clothing will be disposed of or decontaminated before it is removed from the work zone.

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- Unauthorized employees will not remove protective clothing or equipment from change rooms.
- Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, such facilities will be provided and meet the requirements of OSHA §1910.141 – Sanitation – (d) Washing Facilities and (e) Change Rooms.
- Other effective means for cleansing will be provided and used if temperature conditions prevent the effective use of water.

Labeling Requirements for Hazardous Waste

Waste containers need to be labeled. Sometimes, it is not clear exactly what needs to be included on those labels. Requirements can vary depending on your state, where in your facility the waste is kept and what you are doing with the waste (“accumulating” or “transporting”).

When waste is being collected in “satellite accumulation areas” (SAA) or “central accumulation areas” (CAA) at a generator site, it is being “accumulated”, not “stored” (assuming the accumulation is consistent with state or federal SAA/CAA regulations). “Storage” is when waste is kept on-site in excess of applicable SAA/CAA time limits and requires a permit (like at a Treatment, Storage, and Disposal (TSD) facility). So what we are talking about in the generator world are hazardous waste “accumulation” labels, not hazardous waste “storage” labels.

- Basic Labeling Requirements

At the federal level, RCRA rules for container labeling (as well as labeling of tanks and containment buildings) were recently revised as part of the “Generator Improvement Rule” (GIR) process. The updated regulations are found in title 40 of the Code of Federal Regulations, Part 262 (40 CFR § 262). Specific GIR provisions are still being adopted by individual states, and some states may have additional requirements, but under RCRA, hazardous waste in containers in CAA will be labeled with the following:

  - "Hazardous Waste" Marking: The label will prominently display the words "Hazardous Waste"
  - Generator Information:
    - Facility name and address
    - EPA identification number

  Accumulation Start Date: The date when waste began accumulating in the container
- Hazard Class and Description
  - DOT Hazard Class Labels
    - Containers will display appropriate DOT hazard class labels (e.g., flammable, corrosive, reactive)
  - Waste Description: Clearly identify the type of hazardous waste (e.g., "spent solvent" or "acidic solution")
- Proper Shipping Name and UN Identification Number

For containers prepared for off-site transport:

  - Include the proper shipping name (e.g., "Waste Flammable Liquids, N.O.S.") as per DOT requirements.
  - Add the UN/NA number (e.g., UN1993 for flammable liquids).
- Hazard Warnings and Handling Instructions
  - Clearly display appropriate hazard warnings such as
    - "Danger – Toxic"
    - "Caution – Flammable"
  - Add instructions like "Keep Away from Heat" or "Do Not Store Near Acids."
- Labels for Universal Waste

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For universal wastes (e.g., batteries, lamps)

  - Mark as "Universal Waste [Type]" (e.g., "Universal Waste Batteries").
  - Include the accumulation start date
- Labels for Satellite Accumulation Areas
  - Containers in satellite accumulation areas (near the point of generation) will be labeled with
    - "Hazardous Waste" and the description of the waste
    - Ensure containers remain closed except when adding or removing waste
- Additional Requirements for Transport
  - Hazmat Placards: For larger shipments, vehicles may require placards displaying the appropriate hazard class placards.
  - Manifest Tracking Number: Labels will include the hazardous waste manifest tracking number when transporting waste off-site.
- State-Specific Requirements

While RCRA establishes federal guidelines, some states have additional or stricter labeling requirements. Always check local regulations to ensure compliance.

Notes on Containers

As long as containers are compatible with the materials they contain, containers holding incompatible materials are segregated, leaks and spills are addressed promptly and other large or small quantity generator responsibilities are met, then waste containers in SAA only need to be labeled with the words “Hazardous Waste” and an indication of the hazards, since RCRA regulations do not establish time limits for waste in SAAs. See 40 CFR § 262.15 for more information.

The GIR updates (if adopted by states) allow generators to maintain a “lower” generator status for a single planned or unplanned waste generation event that would otherwise push them into a higher generator status. Waste generated from these “episodic” events will be labeled with the words “Episodic Hazardous Waste” as well as an indication of hazards and the date the episodic event began.

These requirements apply whether you are a whether you are a large-quantity generator (LQG) or Small Quantity Generator (SQG). See 40 CFR §262.16 or 40 CFR §262.17 for more information on requirements for SQGs and LQGs.

What Does “Indication of the Hazards” Mean?

RCRA regulations allow generators to use any of the following methods to indicate the hazards of the waste in the containers:

- Words indicating the applicable U.S. EPA hazardous waste characteristic(s): Ignitable, corrosive, reactive or toxic.DOT hazard communication pictograms indicating applicable DOT hazard class/division
- A hazard statement or pictogram consistent with the OSHA Hazard Communication Standard (29 CFR § 1910.1200)
- A chemical hazard label consistent with the National Fire Protection Association Standard 704 (NFPA 704 – Standard System for the Identification of the Hazards of Materials for Emergency Response)

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INSPECTIONS

Satellite Accumulation Area (SAA) Inspections

Time/Quantity Limits

The generator is allowed up to three (3) consecutive calendar days to transfer hazardous waste from an SAA to a central accumulation area. The three-day clock starts when waste amounts exceed limits of:

- 55 gallons of non-acute hazardous waste
- One (1) quart of liquid acute hazardous waste
- One (1) kilogram (2.2 pounds) of solid acute hazardous waste

Locations

There is no limit to the number of SAA allowed at a facility. More than one (1) container is allowed in an SAA, as long as the total volume stored at an SAA does not exceed volumes listed under "Time/Quantity Limits." The management of multiple SAA within the same area of a facility, where the total volume of all SAA within the area is over 55 gallons of non-acute hazardous waste, may be permissible on a case-by-case basis, dependent upon waste generation locations and processes, such as different waste streams generated near the same point of generation.

SAA containers will:

- Be located at or near any point of generation where wastes initially accumulate.
- Be “under the control of an operator” who is familiar with the process and has been trained to manage the container.
- Only be moved from the SAA to the central accumulation area. They will not be moved from one SAA to another SAA.

Container Requirements

While waste accumulates in the SAA, the generator will comply with other routine container requirements:

- Containers in good condition
- Container compatible with waste
- Container kept closed except when adding or removing waste

Weekly Inspections

Regular inspections are required to ensure compliance with container requirements and emergency preparedness.

Central Accumulation Area (CAA) Inspections

Weekly Inspections

At least weekly, the small quantity generator will inspect central accumulation areas. The small quantity generator will look for leaking containers and for deterioration of containers caused by corrosion or other factors.

Container Management

Containers will be:

- Closed

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- Clearly marked or labeled
- Dated with the accumulation start date

Emergency Preparedness

Adequate emergency equipment, such as fire extinguishers and spill control equipment, will be accessible.

Aisle Space

Ensure adequate aisle space between containers for easy access and emergency response.

EMERGENCY RELEASE NOTIFICATION AND REPORTING

Immediate Notification

If a release of an Extremely Hazardous Substance or a CERCLA hazardous substance occurs, the facility will immediately notify the State or Tribal Emergency Response Commission (SERC or TERC) and the Local or Tribal Emergency Planning Committee (LEPC or TEPC) for any area(s) likely to be affected by the release. In addition, releases of CERCLA hazardous substances will also be reported to the National Response Center at 1 (800) 424-8802.

Find your state emergency release contact information.

Emergency notification requirements involving transportation incidents can be met by dialing 911, or in the absence of a 911 emergency number, calling the local operator.

Emergency Release Notification

The emergency release notification will include the following information:

- The chemical name
- An indication of whether the substance is extremely hazardous
- An estimate of the quantity released into the environment
- The time and duration of the release
- Whether the release occurred into air, water, and/or land
- Any known or anticipated acute or chronic health risks associated with the emergency, and where necessary, advice regarding medical attention for exposed individuals
- Proper precautions, such as evacuation or sheltering in place
- Name and telephone number of contact person

Follow-Up Report

A follow-up written report will be submitted to the SERC or TERC and the LEPC or TEPC as soon as practicable after the release. The follow-up written report will update information included in the initial notice and provide information on actual response actions taken and advice regarding medical attention necessary for citizens exposed.

Hazardous Chemical Inventory Reporting

For any hazardous chemical used or stored in the workplace, the facility will maintain a safety data sheet (SDS). The facility will submit the SDS or a list of hazardous chemicals to their SERC or TERC, LEPC or TEPC, and local fire department.

Facilities will also submit an annual inventory of these chemicals by March 1 of each year to their SERC or TERC, LEPC or TEPC, and local fire department. The information submitted by the facility will be made available to the public.

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Submission of Tier II form is required under Section 312 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA). The purpose of this form is to provide state, tribal, and local officials, and the public with specific information on potential hazards. This includes the locations, as well as the amount, of hazardous chemicals present at facilities during the previous calendar year.

Some states may have specific requirements for reporting and submission of the Tier II inventory form and/or the state reporting form or format. Comply with state-specific requirements.

SAFETY AND HEALTH PROGRAM

E & B Oilfield Services Inc. has developed and implemented this Safety and Health Program for our employees involved in hazardous waste operations. The program identifies, evaluates and controls safety and health hazard and provides for emergency response for hazardous waste operations.

The program includes the following:

- An organizational structure.
- A comprehensive work-plan.
- CA site-specific safety and health plan which does not repeat standard operating procedures.
- The safety and health training program.
- The medical surveillance programs.
- The Company's standard operating procedures for safety and health.
- Any necessary interface between general program and site-specific activities.

SITE EXCAVATION

Site excavations created during initial site preparation or during hazardous waste operations will be shored or sloped as appropriate to prevent accidental collapse in accordance with OSHA Regulations.

CONTRACTORS AND SUBCONTRACTORS

In the event a contractor or sub-contractor services are retained for work in hazardous waste operations, E & B Oilfield Services Inc. will inform those contractors, subcontractors or their representatives of the site emergency response procedures and any potential fire, explosion, health, safety or other hazards of the operation that have been identified by our Company's information program.

PROGRAM AVAILABILITY

This written Safety and Health Program will be made available to any contractor or subcontractor or their representative who will be involved with the hazardous waste operation; to employees; to employee designated representatives; to OSHA employees and to employees of other Federal, state or local agencies with regulatory authority over the site.

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ORGANIZATIONAL STRUCTURE OF THE SITE-SPECIFIC PROGRAM

The organizational structure establishes a specific chain of command and specifies the overall responsibilities of supervisors and employees. It includes the following elements:

- A general supervisor who has the responsibility and authority to direct all hazardous waste operations.
- A site safety and health supervisor who has the responsibility and authority to implement the site safety and health plan and verify compliance.
- All other employees needed for hazardous waste site operations and emergency response and their general functions and responsibilities.
- The lines of authority, responsibility and communication.

The organizational structure will be reviewed and updated as necessary to reflect the current status of waste site operations.

COMPREHENSIVE WORK-PLAN OF THE SITE-SPECIFIC PROGRAM

The comprehensive work-plan addresses the tasks and objectives of the site operations and the logistics and resources required to reach those tasks and objectives. The comprehensive work-plan will:

- Define anticipated clean-up activities as well as normal operating procedures that need not repeat procedures available elsewhere.
- Define work tasks and objectives and identify the methods for accomplishing those tasks and objectives.
- Establish employee's requirements for implementing the plan.
- Provide for the implementation of the required training.
- Provide for the implementation of the required informational programs.
- Provide for the implementation of the required medical surveillance program.

SITE-SPECIFIC SAFETY AND HEALTH PLAN

The Site-specific Safety and Health Plan is kept on site and addresses the safety and health hazards of each phase of site operation, including the requirements and procedures for employee protection. The Site-specific Safety and Health Plan include the following minimum elements:

- A safety and health risk or hazard analysis for each site task and operation found in the work-plan.
- Employee training assignments to assure compliance with regulations.
- PPE to be used by employees for each of the site tasks and operations being conducted as required by OSHA standards.
- Medical surveillance requirements in accordance with regulations.
- Frequency and types of air monitoring, employees monitoring and environmental sampling techniques and instrumentation to be used, including methods of maintenance and calibration of monitoring and sampling equipment to be used.

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- Site control measures in accordance with the required site control program.
- Decontamination procedures in accordance with OSHA standards.
- An emergency response plan meeting the requirements for safe and effective responses to emergencies, including the necessary PPE and other equipment.
- Confined space entry procedures.
- A spill containment program meeting OSHA requirement.

The Site-specific Safety and Health Plan provides for pre-entry briefings to be held before initiating any site activity and at such other times as necessary to ensure that employees are apprised of this Plan and that it is being followed. The information and data obtained from required site monitoring analysis work is used to update this Plan.

Inspections will be conducted by the site safety and health supervisor or the general supervisor as necessary to determine the effectiveness of the Plan. Any deficiencies in the effectiveness of the Plan will be corrected without delay.

MEDICAL SURVEILLANCE PROGRAM

Employees handling hazardous substances may be exposed to toxic chemicals, safety hazards, biologic hazards and radiation. Therefore, a Medical Surveillance Program is essential to assess and monitor employees health and fitness for employment in hazardous waste operations and during the course of work; to provide emergency and other treatment as needed; and to keep accurate records for future reference.

E & B Oilfield Services Inc. has instituted a Medical Surveillance Program to cover the following categories of employees engaged in hazardous waste operations:

- All employees who are or may be exposed to hazardous substances or health hazards at or above the established permissible exposure limits for these substances, without regard to the use of respirators, for 30 days or more a year.
- All employees who wear a respirator for 30 days or more a year or as required by HAZWOPER regulations.
- All employees who are injured, become ill or develop signs or symptoms due to possible overexposure involving hazardous substances or health hazards from an emergency response or hazardous waste operation.
- Members of HAZMAT teams.

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E & B Oilfield Services Inc. has made medical examinations and consultations available to the above-named employee categories on the following schedules:

- Before job assignment.
- At least once every twelve months for each employee covered unless the attending physician believes a longer interval (not greater than biennially) is appropriate.
- At termination of employment or reassignment to an area where the employee would not be covered if the employee has not had an examination within the last six (6) months.
- As soon as possible, upon notification by an employee that the employee has developed signs or symptoms indicating possible overexposure to hazardous substances or health hazards or that they have been injured or exposed above the permissible exposure limits in an emergency situation.
- At more frequent times, if the examining physician determines that an increased frequency of examination is medically necessary.

Employees who may have been injured, received a health impairment, developed signs or symptoms resulting from exposure to hazardous substances from an emergency incident or exposed without the necessary PPE being used: as soon as possible will receive follow-up examinations or consultations, if the examining physician determines that are medically necessary.

Elements of Medical Examinations and Consultations

Medical examinations include a medical and work history (or updated history if one is in the employee's file) with special emphasis on symptoms related to the handling of hazardous substances and health hazards and to fitness for duty, including the ability to wear any required PPE under conditions (i.e., temperature extremes) that may be expected at the work site.

The content of medical examinations or consultations made available to employees will be determined by the attending physician.

All medical examinations and procedures will be performed by or under the supervision of, a licensed physician knowledgeable in occupational medicine and will be provided without cost to our employees, without loss of pay and at a reasonable time and place.

E & B Oilfield Services Inc. will provide one (1) copy of the HAZWOPER standard (§1926.120) and its appendices to the attending physician and in addition the following for each employee:

- A description of the employee's duties as they relate to the employee's exposures.
- The employee's exposure levels or anticipated exposure levels.
- A description of any PPE used or to be used.
- Information from previous medical examinations of the employee that is not readily available to the examining physician.
- Information required by §1910.134 – Respiratory Protection.

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Physician's Written Opinion

E & B Oilfield Services Inc. will obtain and furnish the employee with a copy of a written opinion from the examining physician containing the following:

- The physician's opinion as to whether the employee has any detected medical conditions that would place the employee at increased risk of material impairment of health from work in hazardous waste operations, emergency response or from respirator use.
- The physician's recommended limitations on the employees assigned work.
- The results of the medical examination and tests, if requested by the employees.
- A statement that the employee has been informed by the physician of the results of the medical examination and any medical conditions that require further examination or treatment.
- This written opinion will not reveal specific findings or diagnoses unrelated to occupational exposure.

RECORDKEEPING

Accurate records of required medical surveillance will be retained for the period specified and meet the criteria of 29 CFR 1910.1020 (d) Preservation of Records.

The required record will include at least the following information:

- The name and social security number of the employee.
- Physicians' written opinions, recommended limitations and results of examinations and tests.
- Any employee medical complaints related to exposure to hazardous substances
- A copy of the information provided to the examining physician by E & B Oilfield Services Inc., with the exception of the HAZWOPER standard and its appendices.

ENGINEERING CONTROLS, WORK PRACTICES, AND PPE FOR EMPLOYEE PROTECTION

Engineering controls, work practices, PPE or a combination of these, will be implemented to protect employees from exposure to hazardous substances and safety and health hazards.

- Engineering controls and work practices are instituted to reduce and maintain employee exposure to or below the permissible exposure limits for substances regulated by OSHA 1910, Subpart Z, except when such controls and practices are not feasible.
- Engineering controls include the use of pressurized cabs or control booths on equipment and/or the use of remotely operated material handling equipment.
- Work practices include removing all non-essential employees from potential exposure during the opening of drums, wetting down dusty operations and positioning employees upwind of possible hazards.

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- Whenever engineering controls and work practices are not feasible or not required, any reasonable combination of engineering controls, work practices and PPE will be used to reduce and maintain to or below, the permissible exposure limits for substances regulated by OSHA 1910, Subpart Z.
- E & B Oilfield Services Inc. will not implement a schedule of employee rotation as a means of compliance with permissible exposure limits except when there is no other feasible way of complying with the airborne or dermal dose limits for ionizing radiation.
- E & B Oilfield Services Inc. will comply with the provisions of OSHA 1910, Subpart G – Occupational Health and Environmental Control.

An appropriate combination of engineering controls, work practices and PPE will be used to reduce and maintain employee exposure to or below permissible exposure levels for hazardous substances and health hazards not regulated by OSHA 1910, Subparts G and Z.

PPE

E & B Oilfield Services Inc.*'s* PPE program, will meet requirements in §1910.120 – Appendix B:

- PPE selection based upon site hazards.
- PPE use and limitations of the equipment.
- Work mission duration.
- PPE maintenance and storage.
- PPE decontamination and disposal.
- PPE training and proper fitting.
- PPE donning and doffing procedures.
- PPE inspection procedures before, during and after use.
- Evaluation of the effectiveness of the PPE program.
- Limitations during temperature extremes, heat stress and other appropriate medical considerations.

Selection of PPE

- PPE is selected and used to protect employees from the hazards and potential hazards identified during site evaluations.
- The selection of PPE is based on assessments of its performance characteristics relative to the site's requirements and limitations, the task-specific conditions and durations and the identified hazards and potential hazards.
- Positive pressure self-contained breathing apparatus or positive pressure air-line respirators equipped with an escape air supply will be used when chemical exposure levels present will create a substantial possibility of immediate death, immediate serious illness or injury or impair the ability to escape.
- Totally encapsulating chemical protective suits (Level A) will be used in conditions where skin absorption of a hazardous substance will result in a substantial possibility of immediate death, serious illness or injury or impair the ability to escape.

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- The level of protection provided by PPE selection will be increased when additional information or site conditions show that increased protection is necessary to reduce employee exposures below permissible exposure limits.
- NOTE: The level of protection may be decreased when additional information or site conditions show that such action will not result in hazardous exposures.
- PPE will be selected and used to meet the OSHA requirements of §1910.132 – Personal Protective Equipment and additional requirements specified in HAZWOPER regulations.

Totally encapsulating Chemical Protective Suits

- Totally encapsulating suits will protect employees from the particular hazards which are identified during site evaluations.
- Totally encapsulating suits will be capable of maintaining positive air pressure.
- Totally encapsulating suits will be capable of preventing inward test gas leakage of more than 0.5%.

MONITORING

Monitoring is performed in areas where there may be a question of employee exposure to hazardous concentrations of hazardous substances to ensure proper selection of engineering controls, work practices and PPE so that employees are not exposed to levels which exceed permissible exposure limits, if there are no permissible exposure limits, for hazardous substances.

Air monitoring is utilized to identify and quantify airborne levels of hazardous substances and safety and health hazards, determining the appropriate level of protection required for employees on site.

Upon initial entry, air monitoring will be conducted to identify any immediately dangerous to life or health (IDLH) conditions, exposures over permissible exposure limits, exposure above radioactive material dose limits or other dangerous conditions such as the presence of flammable atmospheres or oxygen-deficient environments.

Periodic monitoring is conducted when the possibility of an IDLH condition or flammable atmosphere developing or when there is indication that exposures have increased beyond permissible exposure limits since the last monitoring. Situations where it will be considered whether the possibility that exposures have risen are as follows:

- When work begins on a different portion of the site.
- When contaminants other than those previously identified are being handled.
- When a different type of operation is initiated (e.g., drum opening as opposed to exploratory well drilling).
- When employees are handling leaking drums or containers or working in areas with obvious liquid contamination (e.g., a spill or lagoon).
- After the actual clean-up phase of any hazardous waste operation commences, E & B Oilfield Services Inc. will monitor those employees likely to have the highest exposures to those hazardous substances and health hazards likely to be present above permissible exposure limits by using personal sampling frequently enough to characterize employee exposures. If the employees likely to have the highest exposure are over permissible exposure limits, then monitoring will continue to determine all employees likely to be above those limits.

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DECONTAMINATION

Procedures for all phases of decontamination have been implemented as follows:

- A decontamination procedure will be developed, implemented and communicated to employees before any employees or equipment may enter areas on-site where potential for exposure to hazardous substances exists.
- Standard operating procedures will be developed to minimize employee contact with hazardous substances or with equipment that has been in contact with hazardous substances.
- All employees leaving a contaminated area will undergo appropriate decontamination. All contaminated clothing and equipment leaving a contaminated area will be properly disposed of or decontaminated.
- Decontamination procedures will be monitored by the site safety and health supervisor to assess their effectiveness. Ineffective procedures will be promptly revised to address any deficiencies.

Decontamination will be performed in geographical areas that minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment. All equipment and solvents used for decontamination will be decontaminated or disposed of in accordance with proper protocols.

Personal Protective Clothing and Equipment

- Protective clothing and equipment will be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness.
- Employees whose non-impermeable clothing becomes wetted with hazardous substances will immediately remove that clothing and proceed to shower. The clothing will be disposed of or decontaminated before removal from the work zone.

Unauthorized employees will not remove protective clothing or equipment from change rooms. Commercial laundry or cleaning establishments that decontaminate protective clothing or equipment will be informed of the potentially harmful effects of exposures to hazardous substances.

Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, they will be provided and meet the requirements OSHA 1910.141 - Sanitation. If temperature conditions prevent the effective use of water, then other effective means for cleansing will be provided and used.

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Training Record

Trainer:	
Signature:	
Date:	
Content of Training	
Attendees	
Print Name:	**Signature:**

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