Mountain States Casing Company, LLC

Health, Safety, and Environmental Manual for Mountain States Casing Company, LLC

Assignment of Responsibilities

In accordance with OSHA regulations, the above-named company has assigned responsibility and accountability for the administration of our health, safety, and environmental (HSE) program to:

“As Designated”

Depending on your location, this HSE program may also be referred to as an SHE or EHS program.

The Federal OSHA designation is “HSE”. However, you will notice that all terms are used.

A copy of the HSE program is available upon request for our employees’ review. Questions should be directed to Supervision or Management.

Print Date: May 4, 2026

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POLICY

Mountain States Casing Company, LLC has adopted this Behavior-Based Safety Program for the safety of our employees and help prevent occupational injuries and illness.

The elements of our program consist of:

- Common Goals – Employee and Managerial commitment to the process
- Creating a systematic, ongoing process that defines a set of behaviors that reduce the risk of work-related injury, derived from safety assessments
- Training personnel in the Observation Process
- Observation and data collection on the frequency of critical safety practices
- Feedback and reinforcement to encourage and support positive safety practices
- Action Plan - Team meetings to decide on how to proceed, based on the data
- Review - Monitoring the progress of the Action Plan regularly

OBSERVATION

A critical element in our Behavior-Based Safety (BBS) Program depends on on-site observation. Mountain States Casing Company, LLC will conduct and document direct observations of the affected employee's safe and unsafe acts, providing direct and measurable data. Mountain States Casing Company, LLC ensures that direct and open communication will be maintained with the employees involved and The observer will:

- Meet with the employee at the site and introduce himself and the job being done.
- Observe and monitor the employee, noting his safe behaviors.
- Monitor the At-risk behaviors the employee is putting himself in.

TRAINING

Observation Process Training

Training in the observation process will be established and implemented for the proper personnel. These individuals will be experienced employees of the Company. Training will consist of either classroom or on-the-job training.

Elements of the Training Program Include

- Who is to be trained?
- Ensuring employees know the basic elements of the Behavior-Based Safety program
- Ensuring that all employees involved in the process are trained in the classroom or on the job

The Types of Training that will be Provided Are

- Management training: to ensure the common goals and process of the program are being met
- New employee training: effectively communicating the program to all employees
- Refresher training: to be performed as needed or when changes are made to the policy or procedure of the program

This training will include:

- Program objectives and the metrics used to evaluate the effectiveness of the BBS program
- Incident report reviews
- Conducting on-site observations
- The observer's knowledge of the job procedures they observe
- Knowledge of the correct work and safety procedures involved
- Process on how to complete the observation form
- Determining, analyzing and the meaning behind at-risk behaviors
- Providing feedback training and role play (mentoring and coaching)
- Informing employees, they may be observed at any time

This training process will be documented to keep on record those qualified to observe on-site behaviors and effectively implement the program's elements.

FEEDBACK

Communication is a crucial element in a successful Behavior-Based Safety program. To effectively accomplish this, feedback is of key importance.

The observer will start by commending the safe behavior the employee was doing during his work. You then want to explain, one by one, the At-risk behaviors the employee was doing. Then the observer asks the employee why he was putting himself at risk. For example, if the employee is welding a piece of metal and the sparks are flying in the employee's direction. The observer would then ask the employee why he was not wearing protective clothing, like a flame-retardant apron.

At this time, the observer and employee will discuss the at-risk behaviors until the employee agrees to try the suggested recommendation made by the observer. The employee might be aware of his at-risk behavior or maybe not. The employee may be doing the at-risk behavior for a long time.

The Observer's job here is to highlight this behavior and then explain the associated negative consequences of this behavior. The above discussion and agreement are the individual feedback that helps the employee to change his behavior. This feedback is considered as a form of reward since:

- The employee got commendable comments on his safe behavior.
- The employee understood his at-risk behavior without being reprimanded at the site or reported to his superiors for further penalties.

Key Elements for the Observer to Remember During the Feedback Process

- Review the observation with the employee.
- Start with positive comments on behavior and procedure.
- Reinforce safe behaviors observed.
- Detail and discuss the unsafe behaviors observed and the consequences.
- Gain feedback from the affected employee on the observed unsafe behavior.
- Determine the reasons for the unsafe actions with open-ended questions to the employee.
- Reemphasize that there are no negative consequences at this stage, so long as the observer and employee agree on the change of behavior through corrective actions.

DATA COLLECTION

At the end of the observation, the observer will:

- Fill out an Observation Form with the safe and at-risk behaviors he noticed.
- Record the date, time and location of the observations.
- Note the employee comments and reasons for the at-risk behavior.
- Record recommended safe behavior.

The Observation Form does not note the employee's name or identification number.

- These Company forms will be used by Mountain States Casing Company, LLC to summarize the observation process. Recording this interaction is important for later detailed analysis by the committee in charge of the program.
- Data and the Observation Form will be gathered and entered into an electronic database. Reports will be generated for the committee to analyze at-risk behavior trends.
- Using the data collected through the BBS program and the areas of improvement, Mountain States Casing Company, LLC will institute a continuous improvement process.
- Once areas of improvement are identified using the data collected through the BBS program, Mountain States Casing Company, LLC will institute a continuous improvement process.
- Information taken from the observation and feedback phase of the program will be compiled into useful data and implemented in the action plan.
- Institute a continuous improvement process once areas of improvement are identified in the data collected through the company's Behavior-Based Safety (BBS) program.

ELEMENTS OF THE ACTION PLAN

To address unsafe behaviors Mountain States Casing Company, LLC will construct its Action Plan based on Observation Reports, trend analysis and recommendations from the observers and employees. "As Designated" is responsible for the procedures of the Action Plan.

Action Planning will Include

- Regularly scheduled meetings to analyze Behavior-Based Safety report findings
- Evaluating unsafe behaviors
- Designating responsible parties and time frames to complete the Action Plan
- Ensuring support of management

The Committee will

- Produce a set of recommendations to correct employees' behavior.
- Recommendations may be as simple as providing Personal Protective Equipment (PPE) to employees in a certain location or increasing the workforce in another location.
- Some of the recommendations require site modification or costly machinery. Such recommendations are sent to top management for necessary approvals.

The Committee's responsibility is to ensure that recommendations will

- Change the at-risk behaviors at the targeted location.
- Eliminate hazards and risks caused by hardware or wrong design.

FOLLOW-UP

Any Action Plans set out by Mountain States Casing Company, LLC at the direction of “As Designated” will be completed in a time frame agreed upon by the entire committee.

Regularly scheduled meetings will be held to:

- Assign responsibility for the completion of the Action Plan.
- Ensure that the guidelines of the Action Plan are being carried out.
- To document the Action Plan and its progress.

Behavior-Based Safety Program

Employee Training Form

I, _____, have read or been informed of the Behavior-Based Safety Program and its elements.

- ☐ I am aware of the Company's Safe Work procedures including the Company's Code of Safety Practices.
- ☐ I understand I may be observed in my job performance or assigned task by a designated Observer and this person will inform me that I am being observed.
- ☐ I understand that the Observer will communicate to me the positive and At-risk behaviors I may display on completion of his/her observation.
- ☐ I agree to do my utmost to implement any of the Observers' recommendations they make to improve my performance safely.
- ☐ I understand my cooperation and communication are key to the success of the Behavior-Based Safety program.
- ☐ I understand that the observations of my job performance will not include my name or identifying mark and are used only for statistical information in the program.
- ☐ I agree to follow the procedures of any Action Plan as set out by the Company.

Employee Print Signature Date

BBS Training Form

Company Name:		
Date of Training:		
Trainer's Name:		
☐ Trainee:	☐ Initial Training	☐ Refresher Training

The trainee (observer) named above has been trained to observe the following jobs:

Work Type/Job	Trained	Not Trained
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐

I _____, understand that my training in the above listed jobs qualifies me to observe employees while doing their job(s), conduct feedback with the employee(s) and implement the established goals of the Behavior-Based Safety program. I have also displayed the required knowledge in the following areas:

- Knowing the BBS program objectives
- How to conduct observations
- Knowledge of the jobs being observed
- The correct safety procedures for these jobs
- Filing out the Observation Form
- How to identify at-risk behaviors

Signature:_____ Date:_____

Observation Form

Observer Name:	Date:
Job Being Observed:	

Job Step	Procedure Comments	
	Positive Behaviors	At-risk Behaviors
1		

Recommendations:

Job Step	Procedure Comments	
	Positive Behaviors	At-risk Behaviors
2		

Recommendations:

Job Step	Procedure Comments	
	Positive Behaviors	At-risk Behaviors
3		

Recommendations:

Job Step	Procedure Comments	
	Positive Behaviors	At-risk Behaviors
4		

Recommendations:

Employee Comments:

Observers Signature:_____ Date:_____

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POLICY

Mountain States Casing Company, LLC will maintain a “Safety and Health Program” conforming to the best practices of organizations of this type. To be successful, such a program will embody the proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee but also between each employee and his or her co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved. Safety and health in our business will be a part of every operation.

“As Designated” is responsible for the implementation and enforcement of the following safety rules. Disciplinary procedures will be enforced.

THE COMPANY SAFETY & HEALTH PROGRAM INCLUDES:

- Providing mechanical and physical safeguards to the maximum extent possible
- Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, control health hazards and comply fully with the safety and health standards for every job
- Training all employees in good safety and health practices
- Providing necessary personal protective equipment with proper fitting and instructions for its use and care
- Developing and enforcing safety and health rules and requiring that employees cooperate with these rules as a condition of employment
- Investigating, promptly and thoroughly, every accident to find out what caused it and to correct the problem so that it will not happen again
- Setting up a system of recognition and awards for outstanding safety service or performance

RESPONSIBILITIES

We recognize that the responsibilities for safety and health are shared:

- Mountain States Casing Company, LLC accepts the responsibility for leadership of the safety and health program, for its effectiveness and improvement and for providing the safeguards required to ensure safe conditions
- *Supervisors* are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves
- *Employees* are responsible for wholehearted, genuine operation with all aspects of the Safety and Health Program including compliance with all rules and regulations – and for continuously practicing safety while performing their duties

GENERAL SAFETY RULES

Mountain States Casing Company, LLC employees will follow these safe practice rules, render every possible aid to safe operations and report all unsafe conditions or practices to their supervisor.

- Failure to abide by the Code of Safe Practices may result in disciplinary action up to and including termination.
- Supervisors will insist that employees observe and obey every rule, regulation and order necessary for the safe conduct of the work and will take such action necessary to obtain compliance.

- If you are unsure of the safe method to do your job, STOP and ask your supervisor. Ignorance is no excuse for a safety violation.
- All employees will be given frequent accident prevention instructions. Instructions, practice drills, or articles concerning workplace safety and health will be given at least once every five (5) working days.
- No one will knowingly be permitted to work while the employee's ability or alertness is impaired by fatigue, illness and prescription or over-the-counter drugs. Employees who are suspected of being under the influence of illegal or intoxicating substances, impaired by fatigue or an illness, will be prohibited from working.
- Employees will be alerted to see that all guards and other protective devices are in proper places and adjusted and will report deficiencies. Approved protective equipment will be worn in specified work areas.
- Horseplay, scuffling, fighting and other acts are prohibited.
- Work will be well-planned and supervised to prevent injuries when working with equipment and handling heavy materials.
- Employees will not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties unless they have received instructions from their supervisor. Do not attempt to operate equipment until you are fully trained and authorized.
- Keep your work area clean and free of debris, electrical cords and other hazards. Immediately clean up spilled liquids.
- Always notify all other individuals in your area who might be endangered by the work you are doing.
- A red tag system identifies equipment that is NOT to be operated, energized, or used. All lock-out/tag-out notices and procedures will be observed and obeyed.
- Do not block exits, fire doors, aisles, fire extinguishers, first aid kits, emergency equipment, electrical panels, or traffic lanes.
- Do not leave tools, materials, or other objects on the floor that might cause others to trip and fall.
- Do not distract others while working. If conversation is necessary, make sure eye contact is made prior to communicating.
- Employees will not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation unless it has been determined that it is safe to enter. Confined space protocols will be followed.
- Materials, tools, or other objects will not be thrown from buildings or structures until proper precautions are taken to protect others from falling objects.
- Employees will cleanse thoroughly after handling hazardous substances and follow special instructions from authorized sources.
- Gasoline or other flammable liquids will not be used for cleaning purposes.
- No burning, welding, or other source of ignition will be applied to any enclosed tank or vessel, even if there are some openings until it has first been determined that no possibility of explosion exists and authority for the work is obtained from the foreman or superintendent.
- Any damage to scaffolds, falsework, or other supporting structures will be immediately reported to the foreman and repaired before use.
- Possession of firearms, weapons, illegal drugs, or alcoholic beverages on Company or customer property or the job site is strictly prohibited.
- All injuries will be reported promptly to your supervisor so that arrangements can be made for medical and/or first-aid treatment.

ENFORCEMENT OF SAFETY POLICIES

The compliance of all employees with the Mountain States Casing Company, LLC Safety and Health Program is mandatory and will be considered a condition of employment. All safety rules, procedures and plans in effect are to be followed as specified in the safety program. Employees found to violate Company safety policy may be subject to penalty.

“As Designated” is the supervisor for disciplinary actions and any employee in a position of management or supervisory capacity may initiate disciplinary action against any employee found to violate Company policy. Not following verbal or written safety procedures, guidelines, rules, horseplay, failure to wear selected Personal Protective Equipment (PPE) and/or abuse of selected PPE, constitutes a safety violation.

The following outlines the disciplinary measures that will be taken against employees found to be in violation.

Periodic safety inspections of the workplace and equipment will be undertaken to ensure that all personnel, including supervisory positions, are demonstrating the required commitment to safety. General neglect of safe work procedures, practices and requirements in the workplace, or neglect of equipment safety, will be viewed as a lack of supervisory enforcement of safety policy and the appropriate supervisor/management personnel will be subject to the same disciplinary procedures described below.

The following programs will be utilized to ensure employee compliance with the safety program and all safety rules: training programs, retraining, optional safety incentive programs and disciplinary action.

Training Programs

The importance of safe work practices and the consequences of failing to abide by safety rules will be covered in the New Employee Safety Orientation and at Tailgate/Toolbox Safety Training. This will help ensure that all employees understand and abide by the Company's safety policies.

Retraining

Employees who are observed performing unsafe acts or not following proper procedures or rules will be retrained by their foreman or supervisor. A Safety Contact Report may be completed by the supervisor to document the training. If multiple employees are involved, additional safety meetings will be held.

SAFETY INCENTIVE PROGRAMS

Although strict adherence to safety policies and procedures is required of all employees, The Company may choose to periodically provide recognition of safety-conscious employees and job sites without accidents through a safety incentive program.

DISCIPLINARY ACTION

The failure of an employee to adhere to safety policies and procedures established by Mountain States Casing Company, LLC can have a serious impact on everyone concerned. An unsafe act can threaten not only the health and well-being of the employee committing the unsafe act but can also affect the safety of his/her coworkers and/or customers. Accordingly, any employee who violates any of the Company's safety policies will be subject to disciplinary action.

When a “Safety Violation Notice” is issued, appropriate supervisory personnel will meet with the employee(s) to discuss the infraction and inform the individual(s) of the rule or procedure that was violated and the corrective action to be taken.

Note: Failure to promptly report any on-the-job accident or injury, on the same day as occurrence, is considered a serious violation of the Company's Code of Safe Practices. Any employee who fails to immediately report a work-related accident or injury, no matter how minor will be subject to disciplinary action.

Employees will be disciplined for infractions of safety rules and unsafe work practices that are observed, not just those that result in an injury. Often, when an injury occurs, the accident investigation will reveal that the injury was caused because the employee violated an established safety rule and/or safe work practice(s).

In any disciplinary action, the foreman will be cautious that discipline is given to the employee for safety violations and not simply because the employee was injured on the job or filed a Workers' Compensation claim.

Violations of safety rules and the Code of Safe Practices are to be considered equal to violations of other Company policies. Discipline for safety violations will be administered in a manner that is consistent with the Company's system of progressive discipline. If, after training, violations occur, disciplinary action will be taken as follows:

1. Oral warning. Documented, including date and facts on the "Safety Warning Report" form. Add any pertinent witness statements. Restate the policy and correct practice(s)
2. Written warning. Retrain as to correct procedure/practice
3. Written warning with suspension
4. Termination

As in all disciplinary actions, each situation is to be carefully evaluated and investigated. The step taken in the disciplinary process will depend on the severity of the violation, employee history and regard to safety. Foremen and superintendents will consult with the office if there is any question about whether disciplinary action is justified. Employees may be terminated immediately for willful or extremely serious violations. Union employees are entitled to the grievance process specified by their contract.

Note*:* Consistency in the enforcement of safety rules will be always exercised.

Training Record

Trainer:
Signature:
Date:
Content of Training:
Attendees

Print Name:	Signature:

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POLICY

Mountain States Casing Company, LLC is committed to appropriately investigating all near misses, accidents and incidents according to their severity to find the root cause and make changes that prevent them from happening again.

“As Designated” is designated as the qualified person to conduct investigations once the company is notified of the incident. All incidents will be investigated as soon as practicable after the incident occurs and the extent of the investigation will reflect the seriousness of the incident.

RESPONSIBILITIES

Accident investigation and reporting is a responsibility shared between the Company and its employees. “As Designated” will establish before an incident occurs, how and when proper employees will be notified, who will conduct the investigation and the training they will receive and who is responsible for implementing any corrective actions.

Employer Responsibilities

- Ensuring appropriate staff receives suitable training to carry out their role in hazard and incident reporting, investigation and recording.
- Completing the training for incident investigation.
- Promptly investigating incidents.
- Implementing identified risk control measures to prevent the recurrence of incidents.
- Consulting with staff in relation to the measures to be taken to prevent the recurrence of incidents.
- Reviewing hazard/incident reports to ensure that all recommendations are implemented.
- Ensuring, as far as is reasonably practicable, that adequate financial provision and other resources are made available to institute the recommended actions.
- Communicate with the members of the investigation team and ensure that the team is:
  - Trained, qualified and competent
  - Knowledgeable of their roles and responsibilities for incident response
  - Familiar with the techniques used in incident investigations

Safety Committee Responsibilities

Safety committee members are encouraged to participate in investigations of incidents and assist with developing measures to prevent their recurrence.

- The employee will be trained in their roles and responsibilities for incident response and incident investigation techniques.
- Training requirements relative to incident investigation and reporting (awareness, first responder, investigation and training frequency) will be identified in this program.

Employee Responsibilities

- Not placing themselves or others at risk of injury.
- Reporting incidents to their supervisor or manager and health and safety representative (if applicable), as soon as possible after the event.
- Participating in the development of appropriate risk control measures to prevent the recurrence of similar incidents.
- Using risk control measures as required and any other action taken, which is designed to protect health and safety.

TRAINING

As part of the training in avoiding and preventing accidents and injuries, all employees will receive instructions concerning their roles and responsibilities in the event of an accident or incident. This training will include:

- What qualifies as reportable accidents or incidents (and near misses)
- Who will be contacted in the event of a reportable incident?
- An explanation of the accident/incident investigation plan
- Incident investigation techniques and employee responsibilities during and after an incident/accident

PROCEDURES

Mountain States Casing Company, LLC, regardless of size and impact will investigate all injuries, illness, near misses and fatalities. All work-related fatalities and catastrophes will be reported to the Occupational Safety and Health Administration (OSHA) within eight (8) hours. Serious accidents that result in hospitalizations, amputations, or loss of an eye, will be reported to OSHA within 24 hours. OSHA requires reporting of work-related incidents resulting in the death of an employee or the hospitalization of one (1) or more employees. Incidents involving employees such as injuries, spills, property damage, fires, explosions and vehicle damage will be reported to the owner client as soon as possible but no later than 24 hours.

Accidents and near-miss incidents that result in personal injury, property damage, chemical spill, or other emergencies will be immediately reported to the assigned supervisor at the time of the event and emergency medical service (EMS), fire department, or hazardous materials (HAZMAT) services will be immediately summoned. Such events will be investigated and documented on the appropriate form. All forms will be fully completed and submitted to “As Designated” for review and discussion at the next scheduled safety committee meeting. These investigations demonstrate the Company’s commitment to providing a safe and healthful work environment. Disciplinary policy will be enforced.

To ensure accidents will be reported, employees will be encouraged to participate in the “fact-finding” process. The point emphasized will be that “hazardous conditions” and “unsafe practices” are an indication of a much bigger problem with a breakdown in the safety and health policy. The purpose of the accident investigation then becomes one (1) that will uncover these system problems and provide solutions that will result in long-term corrective action.

It is important to gather facts and interview witnesses as soon as possible after an accident to ensure the most accurate information is being recorded. The efficiency of the corrective measures is determined by the accuracy of the information gathered. The best place to conduct an interview is wherever the employee being interviewed feels most comfortable. The most important interviewing technique you can use to ensure accuracy is to “listen”. **NOTE**: Consider the event a “serious accident” if an employee is admitted to a hospital for treatment or observation because of injuries suffered from a workplace accident. Mountain States Casing Company, LLC will report severe injuries and/or fatalities using one (1) of the following methods:

- By telephone or in person to the OSHA area office that is nearest to the site of the incident,
- By telephone to the OSHA central telephone number, 1-800-321-OSHA (1-800-321-6742),
- By using the reporting application located on OSHA's web site at www.osha.gov.

On-Site First Response

Employees who will be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

Prevent Further Loss

After an immediate rescue, Mountain States Casing Company, LLC will take actions to prevent further loss. For example, maintenance employee will be summoned to assess the integrity of the building and equipment, engineering employee to evaluate the need for bracing of structures and special equipment/response requirements such as safe rendering of HAZMAT or explosives employed.

Secure the Accident/Incident Scene

Before investigating, the accident team needs to ensure the incident site is safe and secure for proper entry and investigation.

Securing the incident site will also help preserve any material evidence that might be altered or removed. Investigators can use cones, tape, or guards to help keep the site secure.

Reporting Requirements

Local reporting sequence of events

Injuries

If a fatal injury, illness, or hospitalization of one (1) or more employees occurs, the plant manager will immediately notify the following persons and agency:

- Corporate Environmental Health and Safety (EHS) director
- Division manager (or any superior at this level)
- Group manager or Team leader (or any superior at this level)
- The area OSHA office [will be notified within eight (8) hours]

Involving the Environment

If an environmental incident occurs that will be reported to local, state and/or federal agencies, the following persons will be notified:

- Corporate EHS director
- Division manager (or any superior at this level)
- Group manager or Team leader (or any superior at this level)
- Appropriate local, state and/or federal agency

Time Elements of When Incident Will Be Reported

Mountain States Casing Company, LLC is required to verbally report incidents to OSHA within eight (8) hours of discovery. Incidents will be reported to owner client as soon as possible (or within 24 hours).

Reportable Incidents

- Injury, illness, death and hospitalization of employees
- Spills, property damage, fires, explosions and vehicle damage

ACCIDENT/INCIDENT CAUSES

Accidents occur when hazards escape detection during preventive measures, such as a job or process safety assessment, when hazards are not obvious, or as the result of combinations of circumstances that were difficult to foresee. A thorough accident investigation may identify previously overlooked physical, environmental, or process hazards, the need for new or more extensive safety training, or unsafe work practices.

The primary focus of any accident investigation will be the determination of the facts surrounding the incident and the lessons that can be learned to prevent future similar occurrences. The focus of the investigation will never be to place blame. The process will be positive and thought of as an opportunity for improvement.

WHEN ACCIDENT/INCIDENT INVESTIGATIONS ARE REQUIRED

As a rule, investigations will be conducted for:

- All injuries (even the very minor ones)
- All accidents with potential for injury
- Fires, explosions, Spills
- Property and/or product damage situations
- All “near misses” where there was potential for serious injury

Near misses and incidents, reporting and investigation allow you to identify and control hazards before they cause a more serious incident. Accident/incident investigations are a tool for uncovering hazards that either were missed earlier or hazards where controls were defeated. However, it is important to remember that the investigation is only useful when its objective is to identify root causes. In other words, every contributing factor to the incident will be uncovered and recommendations made to prevent recurrence.

Accident/Incident Investigation Plan

When a serious accident occurs in the workplace, everyone will be too busy dealing with the emergency at hand to worry about putting together an investigation plan, so the best time to develop effective accident investigation procedures is before the accident occurs. Part of an effective accident and incident investigation plan is to assign responsibilities. The plan will include procedures that determine:

- Who will be notified of accident?
- Who is authorized to notify outside agencies? (Fire, police, etc.)
- Who is assigned to conduct investigations?
- Training required for accident investigators
- Who receives and acts on investigation reports?
- Timetables for conducting hazard correction

GATHER INFORMATION

The next step is to gather useful information about what directly and indirectly contributed to the accident.

The proper equipment will be available to assist in investigating, writing equipment such as paper, pens, measuring equipment, cameras, small tools, audio recorder, personal protective equipment (PPE), marking devices such as flags, equipment manuals, etc.

The following tools will be used to gather as much information as possible:

- Locate witnesses, ensure unbiased testimony and obtain appropriate interview location.

- To ensure detailed interviews, interviewers will be trained.
- Interview eyewitnesses as soon as possible after the accident. Interview witnesses separately, never as a group. Statements will be collected.
- Interview other interested people such as supervisors, co-workers, etc.
- Follow-up interviews with all witnesses.
- Review related records such as: Training records, disciplinary records, medical records, maintenance records, OSHA 300 log and safety committee records.

Documentation

All incident investigations will be documented in a written report and include the following:

- Name of injured employee
- The time, date and location of the incident
- The severity and a detailed description, including the cause of incident or injury
- Name of the investigator and the date the investigation took place
- Evidence collected
- Corresponding corrective actions

The incident can also be documented by photos, videos or sketches of the scene.

Evidence

Evidence will be collected, secured and preserved immediately following the incident and will include witness statements and interviews.

Evidence is defined as: Environmental factors such as weather conditions, illumination, temperature, ventilation, and physical factors such as age and medical conditions, people, equipment, material, and papers will be preserved, secured, and collected through, notes, photographs, witness statements, flagging and impounding of documents and equipment.

Develop a Sequence of Events

Use the information gathered to develop a detailed description of the accident. Make sure the accident is documented in enough detail to enable an individual unfamiliar with the situation to envision the sequence of events. Do not just describe the accident itself; include a description of events that led up to the accident.

Analyze the Accident/Incident

The next step is to determine the cause(s) of the accident. This is the most difficult step because first, the events will be analyzed to discover the surface cause(s) for the accident and then, by asking “why” a number of times, the related root causes are uncovered. Remember, surface causes are usually obvious and not too difficult to determine. However, it may take a great deal more time to accurately determine the weaknesses in the management system, or root causes, that contributed to the conditions and practices associated with the accident.

SURFACE CAUSES

The surface causes of accidents are those hazardous conditions and individual unsafe employee/manager behaviors that have directly caused or contributed in some way to the accident.

Hazardous Conditions May Exist in Any of the Following Categories

- Materials
- Machinery
- Equipment
- Tools
- Chemicals
- Environment
- Workstations
- Facilities
- People
- Workload

It is important to know that most hazardous conditions in the workplace are the result of unsafe behaviors that produced them. Individual unsafe behaviors may occur at any level of the organization.

Some Example of Unsafe Employee/Manager Behaviors Includes

- Failing to comply with rules
- Using unsafe methods
- Taking shortcuts
- Horseplay
- Failing to report injuries
- Failing to report hazards
- Allowing unsafe behaviors
- Failing to train
- Failing to supervise
- Failing to correct
- Scheduling too much work
- Ignoring worker stress

ROOT CAUSES

The root causes for accidents are the underlying system weaknesses that have somehow contributed to the existence of hazardous conditions and unsafe behaviors that represent surface-related causes of accidents. Root causes always preexist surface causes. Inadequately designed system components have the potential to feed and nurture hazardous conditions and unsafe behaviors. If root causes are left unchecked, surface causes will flourish. Root causes may be separated into two (2) categories:

System Design Weaknesses

Missing or inadequately designed policies, programs, plans, processes and procedures will affect conditions and practices generally throughout the workplace. Defects in system design represent hazardous system conditions.

System Implementation Weaknesses

Failure to initiate, carry out, or accomplish safety policies, programs, plans, processes and procedures. Defects in implementation represent ineffective management behavior.

System design weaknesses: Missing or inadequate safety policies/rules; training program not in place; poorly written plans; inadequate process; no procedures in place; develop preventive actions.

System implementation weaknesses: Safety policies/rules are not being enforced; safety training is not being conducted; adequate supervision is not conducted; incident/accident analysis is inconsistent; lockout/tagout procedures are not reviewed annually.

Corrective Actions

Mountain States Casing Company, LLC will include on in the written investigation, immediate corrective actions to be taken as well as long term actions to prevent the recurrence of the incident. All the work done to this point culminates with recommendations to prevent similar accidents from happening in the future. Recommendations will relate directly to the surface and root causes of the accident. These recommendations will include recommended actions such as:

- Assigned responsibilities relative to the corrective actions
- Actions will be tracked to closure
- Engineering controls (e.g., local exhaust ventilation or use of a lift-assisting device)
- Work practice controls (e.g., pre-plan work and remove jewelry and loose-fitting clothing before operating machinery)
- Administrative controls (e.g., standard operating procedures or worker rotation)
- PPE (e.g., safety glasses or respirators)

It is crucial that, after making recommendations to eliminate or reduce the surface causes, the same procedure is used to recommend actions to correct the root causes. If root causes are not corrected, it is only a matter of time before a similar accident occurs.

Written Incident Report

Written incident reports will be prepared and include an incident report form and a detailed narrative statement concerning the event. The format of the narrative may include an introduction, methodology, summary of the incident, investigation board members names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. will be included

Documentation and Communications of Lessons Learned

Lessons learned will be reviewed and communicated to affected employees. Changes to processes will be placed into effect to prevent reoccurrences or similar events.

SUMMARY

A successful accident investigation determines not only what happened but determines how and why the accident occurred. Investigations are crucial as an effort to prevent a similar or perhaps more disastrous sequence of events.

Research has shown that a typical accident is the result of many related and unrelated factors that somehow all come together at the same time. Usually, ten (10) or more factors contribute to a serious accident. Although, this combination of factors normally makes an investigation very time consuming and resource intensive, the good news is that the accident can normally be prevented by removing only a few of the contributing factors.

Employee Incident Report

Reported By:	Date of Report:
Title / Role:	Incident No:
Employee Incident Information	
Employee Name:	Date:
Title / Role:	Time:
Location:	
Specific Area of Location:	
Additional Person(s) Involved:	
Witnesses:	
Incident description including any events leading to or immediately following the incident:	
Employee explanation of events / circumstances:	
Resulting action executed, planned, or recommended:	

CODE OF CONDUCT

Proactive management includes supervisory leadership and control to change unproductive activities. Conformance with safety policies, rules and regulations is a necessary component of our safety program.

Employee safety responsibilities are communicated during initial orientation. Safety rules and regulations are reviewed with employees by their supervisors and are part of the documented safety training process.

Supervisors understand and enforce safety rules as a part of their job. This process may involve coaching, counseling, verbal or written reprimands and discipline in the form of suspension and/or termination. When appropriate, documented verbal warnings and reprimands are issued and carried out by supervisors.

Failure to adhere to any of the safety rules and safe work practices will result in disciplinary action. All discipline will be documented in the employee's folder. Discipline may be more severe depending on the offense.

Employee Name:	Employee Signature	Date
Reporting Staff Name:	Reporting Staff Signature:	Date
HR Name:	HR Signature:	Date

Accident /Incident Report

Date	Time	Day of Week ☐ S ☐ M ☐ T ☐ W ☐ T ☐ F ☐ S	Shift ☐ 1 ☐ 2 ☐ 3	Department

Injured Person

Name:		Address:
Age:	Phone:	
Job Title:		Supervisor Name
Length of Employment at Job Title:		Length of Employment with Company:

Employee Classification: ☐ Fulltime ☐ Part Time ☐ Contractor ☐ Temporary

Nature of Injury	☐ Foreign Body	☐ Other (specify):	
☐ Strain/Sprain	☐ Bruising	☐ Dislocation	Remarks:
☐ Fracture	☐ Chemical Reaction	☐ Internal	
☐ Laceration/Cut	☐ Amputation	☐ Burn/Scald	

Treatment	Name of Treating Physician or Facility:
☐ First Aid	
☐ Emergency Room	Address:
☐ Drs Office	
☐ Hospitalization	

Damaged Property

Property, Equipment or Material Damaged	Describe Damage
Object or Substance Inflicting Damage	

Incident Description

Describe what happened: (attach any photographs or diagrams if necessary):

Root Cause Analysis (check all that apply)

Unsafe Acts	Unsafe Conditions	Management Deficiencies
☐ Improper Work Technique	☐ Poor Workstation Design/Layout	☐ Lack of Written Policies &Procedures
☐ Safety Rule Violation	☐ Congested Work Area	☐ Safety Rules Not Enforced
☐ Improper PPE Or PPE Not Used	☐ Hazardous Substances	☐ Hazards Not Identified
☐ Operating Without Authority	☐ Fire or Explosion Hazard	☐ PPE Unavailable
☐ Failure to Warn or Secure	☐ Inadequate Ventilation	☐ Insufficient Worker Training
☐ Operating at Improper Speeds	☐ Operating at Improper Speeds	☐ Insufficient Supervisor Training
☐ By-Passing Safety Devices	☐ Improper Tool or Equipment	☐ Improper Maintenance
☐ Guards Not Used	☐ Insufficient Knowledge of Job	☐ Inadequate Supervision
☐ Improper Loading or Placement	☐ Slippery Conditions	☐ Inadequate Job Planning
☐ Improper Lifting	☐ Poor Housekeeping	☐ Inadequate Hiring Practices
☐ Servicing Machinery in Motion	☐ Excessive Noise	☐ Inadequate Workplace Inspection
☐ Horseplay	☐ Inadequate Hazards Guarding	☐ Inadequate Equipment
☐ Drug or Alcohol Use	☐ Defective Tools/Equipment	☐ Unsafe Design or Construction
☐ Unnecessary Haste	☐ Insufficient Lighting	☐ Unrealistic Scheduling
☐ Unsafe Act of Others	☐ Inadequate Fall Protection	☐ Poor Process Design
☐ Other:	☐ Other:	☐ Other:

Accident/Incident Analysis
Using the root cause analysis list on the previous page, explain the cause(s) of the incident in as much detail as possible.
Make sketches or illustrations to help describe incident:

How bad will the accident have been? ☐ Very Serious ☐ Serious ☐ Minor	What is the chance of the accident happening again? ☐ Frequent ☐ Occasional ☐ Rare

Preventative Actions			
Describe actions that will be taken to prevent recurrence:	Deadline	By Whom	Complete

Investigation Team		
Name	Signature	Position

Training Record

Trainer:
Signature:
Date:
Content of Training:
Attendees

Print Name:	Signature:

This space is intentionally left blank for printing purposes

POLICY

Mountain States Casing Company, LLC is committed to accident prevention to protect the safety and health of all our employees. Injury and illness losses due to hazards are needless, costly and preventable. To prevent these losses, a joint management/employee safety committee will be established. Employee involvement in accident prevention and support of safety committee members and activities is necessary to ensure a safe and healthful workplace for all employees.

RESPONSIBILITIES

Mountain States Casing Company, LLC Safety Committee members are:

“As Designated”

The Safety Committee will meet a minimum of Zero times per year.

Committee Goal

The Company will strive to meet the following goals:

- Minimize injury and illness in the workplace.
- Open up the lines of communication between management and employees concerning safety at every level of the Company.
- Improve safety of facilities(s) and equipment for a better work environment.

Mission Statement

It is the Company and committee’s goal to create clear avenues of communication among management and staff to create a safe working environment.

Company Commitment

Mountain States Casing Company, LLC is committed to excelling at safety and will support the safety committee’s purpose and recommendations.

Communication of Safety Matters

The committee will handle all safety issues with diligence. We hope to encourage an atmosphere where all employees report safety violations or concerns, ask questions, seek training, or come to us with any safety issues.

Purpose

The purpose of our safety committee is to bring employees and management together in a non-adversarial, cooperative effort to promote safety and health in the workplace. The safety committee will assist management and make recommendations for change.

Organization

There will be, in most cases, an equal number of employee and employer representatives. However, there may be more employee representatives than employer representatives if both groups agree. Employee representatives will be volunteers or elected by their peers. If no employees volunteer or are elected, then they may be appointed by management. Employer representatives will be appointed. Safety committee members will serve a continuous term of at least one year.

Committee membership terms will be staggered so that at least one (1) experienced member is always on the committee.

Extent of Authority

It will be clearly understood that the safety committee advises management on issues that will promote safety and health in the workplace. Written recommendations are expected from the safety committee and they will be submitted to management. In turn, management will give serious consideration to the recommendations submitted and will respond in writing to the committee within a reasonable time.

Functions

- Committee meetings and employee involvement
- Hazard assessment and control
- Safety and health planning
- Evaluation of accountability system
- Evaluation of management commitment to workplace safety and health
- Evaluation of accident and incident investigation program
- Safety and health training

Recommendations

All recommendations submitted to management will be written and will be clear and concise; provide reasons for implementation; give recommended options; show implementation costs and recommended completion dates; list benefits to be gained.

Procedures

The committee's plan of action requires procedures by which the committee may successfully fulfill its role. Procedures developed will include but not be limited to:

- Meeting date, time and location (Safety Committee Meeting Agenda)
- Election of chairperson and secretary
- Order of business
- Records (Safety Committee Meeting Minutes)

Duties of Each Member will Include, but not be limited to

- Reporting unsafe conditions and practices
- Attending all safety and health meetings
- Reviewing all accidents and near-misses
- Recommending ideas for improving safety and health
- Working in a safe and healthful manner
- Observing how safety and health is enforced in the workplace
- Completing assignments given to them by the chairperson
- Acting as a work area representative in matters of health and safety
- Others as determined by Company safety and health needs

The Safety Coordinator(s) and/or Safety Committee Members

Mountain States Casing Company, LLC has designated:

Safety Coordinator	"As Designated"
Safety Coordinator	
Safety Committee Chair	
Safety Committee Vice-chairman	
Safety Committee Alternate Chair/Vice-chair	

Their cell phone and office phone numbers are:

Safety Person's Name	Office Phone #	Cell Phone #

It is the duty of "As Designated", the Safety Coordinator, to assist the Supervisor/Foreman and all other levels of Management in the initiation, education and execution of an effective safety program.

PROCEDURES

The purpose of a safety committee is to bring employees and managers together to achieve and maintain a safe, healthful workplace. It is easy to start a safety committee but developing an effective one – one that achieves and maintains a safe, healthful workplace – requires employees and managers who are committed to achieving that goal. Effective safety committees find solutions to problems that cause workplace accidents, illnesses and injuries. Fewer accidents, injuries and illnesses mean lower Workers' Compensation Claims costs and insurance rates.

Understand a Safety Committee's Seven Essential Activities

Anyone can start a safety committee, but to make it effective, the committee will be built on a foundation of management commitment and will be accountable for achieving its goals. The committee will do the following:

- Involve employees in achieving the committee's goals.
- Identify workplace hazards.
- Review reports of accidents and near misses.
- Keep accurate records of committee activities.
- Evaluate its strengths and weaknesses.

Commitment

The committee will not survive without management support. Management demonstrates support by encouraging employees to get involved in achieving a safe, healthful workplace and by acting on the committee's recommendations. Representatives demonstrate commitment by attending committee meetings, following through on their assigned tasks and encouraging other employees to get involved in identifying hazards.

Accountability

Representatives will understand that the committee expects them to contribute; each representative shares responsibility for accomplishing safety committee goals, which benefit everyone who works for The Company.

The safety committee is also responsible for monitoring how management holds employees accountable for working safely and for recommending ways to strengthen accountability.

Employee Involvement

To become effective, a safety committee needs help from everyone in The Company. The safety committee will have a method for employees to report hazards and offer safety suggestions.

Ways the Safety Committee can encourage employees to get involved:

- Encourage employees to report hazards and unsafe work practices to a safety committee representative.
- Act on employee suggestions and recognize their contributions to a safer workplace.
- Promote the committee's activities and accomplishments.

Make sure employees know that you are starting a safety committee. Tell them why you are starting the committee, describe its role in the Company's safety and health program and explain management's commitment to the committee.

You can inform employees in a memo or a newsletter, by e-mail, or – better yet – meet with them to promote the committee and to answer questions.

Hazard Identification

The safety committee plays an important role in keeping the workplace hazard-free:

- Ensure that representatives know how to recognize hazards and understand basic principles for controlling them.
- Focus on identifying hazards and unsafe work practices that are likely to cause serious injuries.
- Conduct thorough workplace inspections at least quarterly.
- Document hazards during quarterly inspections and discuss how to control them at regular safety-committee meetings.
- Include employer and employee representatives on the inspection team.

Accident Investigation

The committee will have a procedure for investigating all workplace accidents, illnesses and deaths. It is not necessary for the committee to conduct accident investigations or to participate in investigations; however, the committee will ensure that management does so. The committee will also carefully review accident reports to help management identify accident causes and determine how to control them.

Recordkeeping

You may not think of record keeping as an essential activity, but accurate, well-organized records document the committee's accomplishments and can inform the committee what it needs to do to improve.

The following documents are required for the safety committee's file:

- Accurate minutes of each safety committee meeting
- Committee reports, evaluation and recommendations
- Management's response to committee recommendations
- Employee safety suggestions and hazard concerns

Evaluation

Evaluation answers the question "Are we effective?" Effective safety committees periodically evaluate their strengths and weaknesses and the evaluation helps them set new goals.

At least once a year, schedule a half-day safety committee meeting to accomplish the following: identify the committee's achievements over the past 12 months, review essential activities and set goals for the next 12 months.

Training Record

Trainer:
Signature:
Date:
Content of Training:
Attendees

Print Name:	Signature:

SAFETY TRAINING DOCUMENTS

This section is designated to hold all Company Safety Training Documents. Any paperwork related to Company Safety Training will be 3-ring hole-punched and stored in this section.

ATTACHMENTS

- New Employee Safety Orientation Form
- Daily Job Log
- OSHA 300 - Log of Work-Related Injuries and Illness (sample)
- OSHA 300A - Summary of Work-Related Injuries and Illness (sample)
- OSHA 301 - Injury and Illness Incident Report (sample)

New Employee Safety Orientation Form

Employee Name:			Date Hired:	Orientation Date:
Job Title:		Unit Name:		
Check One	☐ New Employee	☐ Transfer	☐ Rehire	☐ Part Time	☐ Temporary

Check items covered:

- ☐ Safety Program
  - ☐ Safety Committee, Safety Meetings, Names of Safety Committee Representatives
  - ☐ Safety Policies and Procedures
  - ☐ Hazard Notification Procedure
- ☐ Accident Reporting
  - ☐ Report All Accidents to Supervisor Immediately
- ☐ First Aid
  - ☐ Names of First Aid Trained Employees
  - ☐ Location of First Aid Kits
  - ☐ Location of Another Emergency Equipment
  - ☐ How to Summon Medical Aid
- ☐ Emergency Action Plan
  - ☐ What to Do in The Event of Fire, Earthquake, Chemical Spill and Other Emergencies
  - ☐ Building Evacuation Procedures
  - ☐ Location of Exits, Evacuation Routes, And Designated Evacuation Location
  - ☐ Location of Fire Alarm Pull Stations and Fire Extinguishers
  - ☐ How to Summon Emergency Aid
- ☐ Personal Work Habits
  - ☐ Proper Lifting Techniques
  - ☐ Office Ergonomics
  - ☐ Good Housekeeping
  - ☐ Avoiding Slips and Falls
  - ☐ Indoor Air Quality Policy
  - ☐ Smoking Policy
- ☐ Potential Hazards on The Job
  - ☐ Identification of Job Specific Hazards and How to Minimize Hazards
  - ☐ Assigned Personal Protective Equipment – Care, Use, Limitations
  - ☐ Understanding the Risks of All Hazardous Materials and the Location of SDS
- ☐ On the Job Training (List)
  - ☐ Equipment Specific Training
  - ☐ Task Training
  - ☐ Regulatory Training

Instructor's Name:	Signature:	Date:
Trainee's Name:	Signature:	Date:

Daily Job Log

Job Location	Day of Week ☐ S ☐ M ☐ T ☐ W ☐ T ☐ F ☐ S	Job #	Today's Date
Job Name	Weather Conditions	Site Conditions	Time

Crew Foreman/Supervisor	Company Competent Person(s)

Crew Members	Start	Finish	Total	Special Materials Needed

Crew Members	Start	Finish	Total	Expected Problems/Delays Today

Special Safety Training/Equipment Required
Special Safety Requests/Assignments (describe)
Work Performed Today

Change Orders Issued (describe)	Authorized By

Special Tools/Equipment Rented Today	Rented From	Rate/hour	Total Cost

Material Purchased	Cost	Special Planning Required for Tomorrow

Accidents/Incidents/Near Misses (described)
Other
Supervisor's Signature

OSHA's Form 300 (Rev 01/2004)

Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 20

U.S. Department of Labor
Occupational Safety and Health Administration

Form Approved OMB No.12180176

You must record information about every work-related death and about every work-related injury or illness that revives lass of consciousness, restricted work activity or lob transfer, days away from work or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1004.12. Feel free to use two lines fora single case if you need to. You must complete a kV* and Illness Incident Report Form 301) or equivalent form for each injury or illness recorded on this form. If you are not sure whether a case is recordable, call your local OSHA office for help

Established Name

City | State

Identify the Person			Describe the Case			Classify: CHECK ONLY ONE box for each case based on the most serious outcome for that case				Enter the number of days the injured or ill worker was		Check the Injury column or choose one type of illness					
						Death	Days away from Work	Job transfer or restriction	Other record able cases	Away from Work	On Job Transfer or Restriction	Injury	Skin Disorder	Respiratory Illness	Poisoning	Hearing Loss	Other
A Case No.	**B** Name	**C** Job Title	**D**	**E** Location	**F** Describe Injury/Illness	**G**	**H**	**I**	**J**	**K**	**L**	**M**-1	**M**-2	**M**-3	**M**-4	**M**-5	**M**-6
						☐	☐	☐	☐			☐	☐	☐	☐	☐	☐
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				Page Totals								**M**-1	**M**-2	**M**-3	**M**-4	**M**-5	**M**-6

Be sure to transfer these totals to the Summary Page (Form 300A) before you post it

Public reporting of this collected information is estimated to average 14 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collected information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact US Department of Labor, OSHA Office of Statistical Analysis. Room #3644, 200 Constitution Avenue, N.W. Washington, D.C. 20210. Do not sent the completed forms to this office.

OSHA's Form 300 (Rev 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 20

U.S. Department of Labor

Number of Cases

	Total number of deaths	Total number of cases with days away from work,	
	Total number of other recordable cases	Total number of cases with job transfer/restriction	

Number of Days

	Total number of days away from work.	Total number of days of job transfer or restriction	

Injury and Illness Types

	Total number of:		
	Injuries	Skin disorders	
	Respiratory Conditions	Poisonings	
	Hearing Loss	All Other Illnesses	

All establishments covered by Part 1904 must complete this Summary Page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category, then write the totals below, making sure you have added the entries from every page of the Log. If you had no cases, write 0.

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

The public reporting burden for this collection of information is estimated to average 1/2 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact: U.S. Department of Labor, OSHA Off ice of Statistical Analysis, Room N 3644, 200 Constitution Avenue, N.W., Washington, D.C. 20210. Do Not send the completed forms to this office.

Establishment Information

Your Establishment Name:

Street

City	State	ZIP

Industry Description (e.g. Manufacture of motor truck trailers)

Standard Industrial Classification (SIG) (e.g. 3715)

North American Industrial Classification (NAICS)

Employment Information

(If you do not have these figures, see the Worksheet on the back of this

Annual average number of employees:	Total employee hours worked last year:

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document, and to the best of my knowledge, is true, accurate, and complete.

Print:

Signature:

Title	Phone:	Date:

OSHA's Form 301

Injury and Illness Incident Reports

ATTENTION: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 20

U.S. Department of Labor

Occupational Safety and Health Administration

Information about the Case

Case Number from the Log:	Date of Injury or Illness:
Time Employee Began Work:	Time of Event: ☐ Check if time cannot be verified

What was the employee doing just before the incident occurred? Describe the activity; as well as the tools, equipment, or material the employee was using. Be specific. Examples: "climbing a ladder while carrying roofing materials"; "spraying chlorine from hand sprayer"; "daily computer key-entry,"

What happened? Tell us how the injury occurred.
Examples: " When ladder slipped 011 wet floor, worker fell 20 feet"; "Worker was sprayed with chlorine when gasket broke during replacement"; "Worker developed soreness in wrist aver time."

What was the injury or illness? Tell on the part of the body that was affected and how it was affected; be more specific than "hurt" "pain," or "sore".

What object or substance directly harmed the employee?
Examples: "concrete floor"; "chlorine"; "radial arm saw."
NOTE: If this question does not apply to the incident, leave it blank.

If the employee died when did death occur? Date of death:
__/__/__

Information about the Employee

Full Name:		
Street Address:		
City:	State:	ZIP:
Date of Birth:	Date Hired:	☐ Male ☐ Female

Information about Health-Care Provider

Name of Health-Care Provider:				
Facility Address:				
City		State:		ZIP:
Was employee treated in an emergency room?	☐	**Yes**	☐	Was employee hospitalized overnight as an in-patient?
	☐	**No**	☐	

The public reporting burden for this collection of information is estimated to average 1/2 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact: U.S. Department of Labor, OSHA Off ice of Statistical Analysis, Room N 3644, 200 Constitution Avenue, N.W., Washington, D.C. 20210. Do Not send the completed forms to this office.

This Injury and Illness Incident Report is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the Log of Work-Related Injuries and Illnesses and the accompanying Summary, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.

Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.

According to Public Law 91-596 and 29 CFR 1904, OSHAs recordkeeping rule, you must keep this form on file for 5 years following the year to which it pertains.

If you need additional copies of this form, you may photocopy and use as many as you need.

Completed by:	
Title:	
Phone:	Date:

RESPONSIBILITIES

“As Designated” is the designated Company safety coordinator.

POLICY

The Occupational Safety and Health (OSH) Act of 1970 clearly defines the requirement to provide safe and healthful working conditions for all employees. Therefore, the safety and health of our employees is the first consideration in operating this business.

Safety and health in our business will be part of every operation. Without question, it is every employee’s responsibility at all levels.

It is the intent of Mountain States Casing Company, LLC to comply with all laws. To do this, we will constantly be aware of conditions in all work areas that can produce injuries. No employees will be required to work at a job they know is not safe or healthful. Your cooperation in detecting hazards and, in turn, controlling them, is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.

The personal safety and health of each employee of Mountain States Casing Company, LLC is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity, whenever necessary. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards.

We will maintain an occupational safety and health program conforming to the best practices of organizations of this type. To be successful, such a program will embody proper attitudes towards injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and their co-employees. Only through such a cooperative effort, can a safety and health program, in the best interest of all, be established and preserved.

Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of operations like ours. Our goal is zero (0) accidents and injuries.

Our Safety and Health Program Includes:

- Providing mechanical and physical safeguards to the maximum extent possible.
- Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, to control health hazards, and to fully comply with Occupational Safety and Health Administration (OSHA) safety and health standards for every job.
- Training all employees in good safety and health practices.
- Providing necessary personal protective equipment (PPE) with proper fitting and instructions for proper use and care.
- Developing and enforcing safety and health rules and requiring that employees cooperate with these rules as a condition of employment.
- Investigating, promptly and thoroughly, every accident to find out what caused it, and correct the problem so it will not happen again.

We Recognize That Responsibilities for Occupational Safety and Health are Shared:

- This employer accepts responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe work conditions.
- Supervisors are responsible for developing proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all employee involved, including themselves.
- Employees are responsible for wholehearted, genuine operations of all aspects of the safety and health program – including compliance with the rules and regulations – and for continuously practicing safety and health while performing their duties.

“As Designated” will ensure that all employees are properly instructed and supervised in the safe operation of any machinery, tools, equipment, process, or practice that they are authorized to use or apply while at work.

Production is never so urgent that we cannot take the time to do our work safely.

Program Goals

Why have a workplace “safety and health plan”? Taking risks is part of running a business, particularly for small business owners. You take risks in product development, marketing, and advertising to stay competitive. However, some risks will never be taken. One (1) of these is risking the safety and health of employees. Safety begins at the top and goes downward throughout the Company. The primary goal of Mountain States Casing Company, LLC is to continue operating a profitable business while protecting employees from injuries or illness. This can be achieved by delegating responsibility and accountability to all involved in Mountain States Casing Company, LLC*’s* operation.

- Responsibility: Having to answer for activities and results
- Accountability: The actions taken by management to ensure the performance of responsibilities

In other words, to reach our goal of a safe workplace, everyone needs to take responsibility and be held accountable.

Benefits of Achieving our Goals Are:

- Minimizing of injuries and accidents
- Minimizing the loss of property and equipment
- Elimination of potential fatalities
- Elimination of potential permanent disabilities
- Elimination of potential OSHA fines
- Reductions in employees compensation costs
- Reductions in operating costs
- Having the best “safety and health” conditions possible in the workplace

Management Commitment

Mountain States Casing Company, LLC is committed to building an effective injury and illness prevention plan, putting it in writing, and integrating it into the entire operation.

The management of Mountain States Casing Company, LLC is committed this safety policy, and to provide direction and motivation by:

- Appointing safety coordinator(s) and/or safety committee chairmen
- Establishing Company safety goals and objectives
- Developing and implementing this written safety and health program
- Ensuring total commitment to the safety and health program
- Facilitating employees’ safety training
- Establishing responsibilities for management and employees to follow
- Ensuring that management and employees are held accountable for performance of their safety responsibilities
- Establishing and enforcing disciplinary procedures for employees
- Reviewing the safety and health program annually, and revising or updating as needed

Labor and Management Accountability

All employees, both labor and management, need to understand their responsibilities under OSHA rules and be held accountable for complying with the rules as well as the Company’s related policies.

It is the responsibility of Mountain States Casing Company, LLC to provide a safe and healthful work environment for their employees. However, holding everyone accountable for their part in workplace safety and health is critical for a successful injury and illness prevention plan.

Assignment of Responsibility

The safety coordinator(s) and/or safety committee members Mountain States Casing Company, LLC has designated:

Safety Coordinator	"As Designated"
Safety Coordinator	
Safety Committee Chair	
Safety Committee Vice-chairman	
Safety Committee Alternate Chair/Vice-chair	

Their cell phone and office phone numbers are:

Safety Person's Name	Office Phone #	Cell Phone #

"As Designated" will assist managers in initiating, educating, and executing the safety program with:

- Introducing the safety program to new employees.
- Following up on recommendations, suggestions, etc., made at the "weekly" safety meetings. All topics of safety concerns will be documented accordingly.
- Assisting the employee in the execution of standard policies.
- Conducting safety inspections on a periodic basis.
- Addressing all hazards or potential hazards as needed.
- Preparing monthly accident reports and investigations.
- Maintaining adequate and available first aid supplies and safety equipment.
- Ensuring an adequate number of qualified "first aid certified" people on the work site
- Becoming thoroughly familiar with OSHA regulations and local and state safety codes.
- Defining the responsibilities for safety and health of all subordinates and holding each person accountable for their results through the formal appraisal system and, where necessary, disciplinary procedures.
- Emphasizing the unnecessary personal and financial losses of all accidents.

Employee Involvement

Employees are required to work in compliance with the safety rules, report all accidents and near misses, and report all unsafe conditions or unsafe practices. To demonstrate Mountain States Casing Company, LLC*'s* commitment to support the employees in these responsibilities, Mountain States Casing Company, LLC will do the following:

Communication System

- Encourage employees to inform Mountain States Casing Company, LLC about workplace hazards without fear of reprisal.
- Establish and maintain a centrally located "safety bulletin board" where current, relevant information may be easily reviewed by employees.
- Schedule general employee meetings where safety is freely and openly discussed by those present. These meetings will be regular, scheduled, and announced to all employees and managers to achieve maximum attendance. The purpose of these meetings is safety, and the concentration will be on:
  - Occupational accident and injury history at our work sites, with possible comparison to other locations within the Company
  - Feedback from the safety committee
  - Guest speakers concerned with workplace safety and health
  - When possible, brief audio-visual materials that relate to our business
- Conduct training programs for communicating with employees.
- Provide a safety suggestion box so that employees, anonymously if desired, can communicate their concerns with management.
- Document all communication efforts to demonstrate that an effective communication system is in place.

Hazard Identification and Control

Periodic inspections and procedures for correction provide methods of identifying existing or potential hazards in the workplace and eliminating or controlling them. Hazard control is essential to an effective injury and illness plan. We will be sure to look at safe work practices and ensure that they are being followed, and that unsafe conditions or procedures are identified and corrected properly and promptly.

Employees are encouraged to report possible hazardous situations, knowing their reports will be given prompt and serious attention. Workplace equipment and PPE will be maintained in good, safe working condition.

Hazards, where possible, will be corrected as soon as they are identified. For those that cannot be immediately corrected, a target date for correction will be set. Mountain States Casing Company, LLC will provide interim protection for workers while hazards are being corrected. A written tracking system will be established to help monitor the progress of the hazard correction process.

Accident/Incident Investigation

Employers and safety committees are required to investigate or assign responsibility for investigating accidents. Trained individuals, with the primary focus of understanding why the accident or incident occurred, will investigate accidents/incidents and what actions can be taken to preclude recurrence. The focus will be on solutions and never on blame. They will be in writing, and adequately identify the causes of the accident or near miss occurrence.

Worker Training

Training is another essential element of any injury and illness prevention plan. OSHA rules require each employer to train workers for any job or task they are assigned.

Our plan includes training and instruction:

- For all employees when they are first hired
- For all new employees for each specific task
- For all employees given new job assignments for which training has not already been received
- Whenever new substances, processes, procedures, or equipment are introduced into the workplace and present a new hazard
- Whenever new PPE or different work practices are used on existing hazards
- Whenever Mountain States Casing Company, LLC is made aware of a new or previously unrecognized hazard
- For all supervisors to ensure they are familiar with the safety and health hazards to which employees under their immediate direction and control may be exposed

An effective safety and health plan require proper job performance by everyone in the workplace.

Mountain States Casing Company, LLC will ensure that all employees are knowledgeable about the materials and equipment with which they work, what known hazards are present, and how they are controlled.

Program Evaluation

Regular reviews will be held to look at the components of our safety and health plan, to determine what is working well and what changes, if any, are needed. All employees are encouraged to participate by keeping Mountain States Casing Company, LLC informed of their concerns regarding the elements of this safety and health plan.

The success of this safety and health plan is dependent upon two (2) things: First, Mountain States Casing Company, LLC will provide a safe and healthful environment in which the employee can work safe, and second, the employee will choose to work safe.

Supervisor/Foreman

The supervisors and/or foremen will establish an operating atmosphere to ensure that safety and health is managed in the same manner and with the same emphasis as production, cost, and quality control. This will be accomplished by:

- Regularly emphasizing that accident and health hazard exposure prevention are not only moral responsibilities, but also a condition of employment.
- Identifying operational oversights that will contribute to accidents which often result in injuries and property damage.
- Participating in safety and health related activities, (e.g. safety meetings, facility reviews, and correcting dangerous employee behavior).
- Explaining the safety policies and the hazards of each person's particular work.
- Ensuring that initial orientation of "new hires" is properly carried out.
- Making sure that if a "competent person" is required, that one (1) is present to oversee, and instruct employees when necessary.
- Never short-cutting safety for expediency, nor allowing workers to do so.
- Consistently enforce safety rules and enforce discipline.
- Conducting daily job-site inspections and correcting noted safety violations.

Employees

It is the duty of all employees to know the safety rules and conduct their work in compliance with these rules. Disregard of the safety and health rules will be grounds for disciplinary action up to and including termination. It is also the duty of each employee to make full use of the safeguards provided for their protection. Every employee will receive an orientation when hired and receive a copy of any Company safety and health programs. Employee responsibilities include the following:

- Reading, understanding, and following safety and health rules and procedures.
- Signing the code of safe practices and any other policy acknowledgements.
- Wearing PPE at all times when working in areas where there is a possible danger of injury.
- Wearing suitable work clothes as determined by the supervisor/foreman.
- Performing all tasks safely as directed by their supervisor/foreman.
- Reporting all injuries, no matter how slight, to their supervisor/foreman immediately and seeking treatment promptly.
- Knowing the location of first aid, firefighting equipment and safety devices.
- Attending all required safety and health meetings.
- Not performing potentially hazardous tasks, or using any hazardous material until properly trained, and following all safety procedures for those tasks.
- Stop and ask questions when unsure about how to safely do the work.

MEDICAL FACILITIES

Each worksite will identify and contact an appropriate hospital or clinic to ensure they can handle possible emergencies and injuries in a timely manner. The location and contact information for the medical facility will be provided to all employees and posted at the worksite in a place all employees gather.

POSTING REQUIREMENTS

All federal, state, and local posting requirements will be posted at the worksite in a place all employees gather. Particularly the OSHA job safety and health poster, state labor law postings, required insurance postings, and emergency contact numbers.

HEALTH, SAFETY, AND ENVIRONMENT (HSE) SUPERVISOR

At least one (1) supervisor will be always at the worksite who is designated the HSE supervisor. This person will have at least appropriate OSHA ten (10) hour outreach training and meet the definition of OSHA for competent or qualified person for the task at hand.

EVALUATING SAFETY PROGRAM PERFORMANCE

The effectiveness of this safety plan will be evaluated at least annually using leading and lagging indicators compared year after year to measure the effectiveness of the safety policy and established safe work procedures.

Lagging indicators compared will include the experience modification rate (EMR) and other recorded injuries and incidents such as Total Recordable Incident Rate (TRIR), Days Away, Restricted or Transferred (DART) and fatalities.

Leading indicators compared include documented near miss investigations, employee training records, recorded hazardous conditions investigations, safe work permits (e.g. confined spaces, hot work), and maintenance checklists.

The safety professional will complete an annual report of these safety program performance metric measurements with suggested changes to the safety policy and safe work procedures.

CODE OF CONDUCT

All Mountain States Casing Company, LLC employees will abide by our company code of conduct when performing any company business activities. Mountain States Casing Company, LLC will further ensure that company employees adhere to all client requirements and safe practices when performing work at the client site.

Mountain States Casing Company, LLC employees will not:

- Engage in any unlawful or unethical activities
- Divulge any company or client confidential or proprietary information to unauthorized employee
- Use or tolerate the use of drugs or alcohol at the workplace
- Engage in any actions that constitute sexual harassment or workplace violence

Prevention

Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity, whenever necessary. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards.

Reporting Violations

Employees will be required to report any safety, health, or ethical violations to the company as soon as possible.

The company will establish a method that allows employees to report any code of conduct violations anonymously and without fear of reprisal.

Communication

This code of conduct will be communicated to all employees at their times of hire, and will be reviewed at least annually, or when any changes are made.

Disciplinary Actions

The company will investigate all reports of violations, and any employees found to have violated our code of conduct will be subject to progressive disciplinary action according to our disciplinary policy, up to and including termination.

Any violations of our code of conduct deemed to illegal or unlawful will be reported to the appropriate authorities.

Commitment

The goal of Mountain States Casing Company, LLC is to operate a profitable business with the highest possible standards of integrity. This can be achieved by ensuring that all employees abide by our code of conduct. We are committed to operating in a professional and courteous manner in all our business practices.

Owner Name	**Owner Signature**	**Date**

Training Record

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

POLICY

Mountain States Casing Company, LLC has adopted the following program to ensure that short-service employees are identified, appropriately supervised, trained, mentored and managed. This program is adopted to prevent accidents such as personal injury, injury to others, environmental damage and/or property damage by the short service employee.

Mountain States Casing Company, LLC defines a short-service employee (SSE) as any person or employee with less than six (6) months of experience in his/her current position or with one's current employer. A person can also be classified as an SSE if they change jobs within the Company they are working for or as a new hire for the same type of position for another company.

Mountain States Casing Company, LLC is responsible for ensuring that the following policy and safe work practices are enforced.

REFERENCES

Although OSHA has no specific requirements regulating short-service employees, Mountain States Casing Company, LLC has adopted this policy for the general safety of its employees and will follow industry best practices.

RESPONSIBILITIES OF EMPLOYER

Mountain States Casing Company, LLC is responsible for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions

Mountain States Casing Company, LLC is responsible for informing a host facility (hiring client) if an SSE will be performing work at their facility or job site.

Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.

RESPONSIBILITIES OF EMPLOYEE

Employees are responsible for wholehearted, genuine operation with all aspects of the Safety and Health Program including compliance with all rules and regulations – and for continuously practicing safety while performing their duties

HAZARDS

High Hazard Areas

SSEs may be prohibited from entering and working in high-hazard areas in certain situations, these may include:

- Naturally occurring radioactive material (NORM)
- H^2S areas
- Confined spaces

PROCEDURES (SAFE PRACTICES)

Work Crew Assignments and Restrictions

- A single employee as his own crew is not considered an SSE
- Employees defined as SSE are not permitted to work alone
- When crew/group sizes of less than five (5) are assembled, no more than one (1) SSE per group/crew is allowed
- When working with crew/group sizes larger than five (5) members, the number SSEs will not exceed 20% of the crew/group makeup.
- If the crew/group exceeds the twenty percent (20%) makeup of SSEs, a written variance form is required, which will serve as a mitigation plan. This variance will be approved by the Supervisor and/or Manager in charge of the project

Communication and Notification

The processes for the proposed crew/group, when using an SSE, are outlined in the Short Service Employee Form. Before beginning the job assignment, the Supervisor/Manager in charge will submit the completed SSE form for all the jobs that will contain SSE personnel, to the project's coordinator, on-site supervisor, or contractor. The work owner or supervisor/person in charge will decide the SSE approval status and will keep the original completed form in the project files.

Identification

All SSE personnel will be easily identifiable from more seasoned employees using one of the following methods:

- Wearing a standardized color high-visibility hard hat
- Wearing a standardized color vest
- Any other method which identifies the employee as an SSE

Monitoring SSE's

The supervisor will monitor their employees, which includes the SSE personnel for their safety performance, compliance with company safety policies and procedures and Environmental, Health and Safety (EHS) awareness.

The identifier marking the SSE may be removed from the SSE Program at the discretion of the supervisor at the end of the required six-month period if the SSE has:

- Worked safely
- Adhered to all EHS policies
- Had no recordable incidents attributed to them

The supervisor will require the employee who fails to complete the six (6) months free of recordable incidents, to get the operator to approve in writing before allowing the person to return to the operator's property.

Mentoring Process

All SSE's will be assigned a mentor for the first six (6) months of employment. A mentor's responsibility is to develop the SSE personnel by providing guidance, instructions and supervision. A mentor may be assigned only one (1) SSE per crew/group and will never allow an assigned SSE to work alone by always being onsite to monitor the SSE.

The mentor will meet the following requirements:

- Knowledgeable and experienced, and have up-to-date orientation training
- Be familiar with the SSE's job, have the oversight responsibilities required and all hazards accompanied with the job
- Be familiar with all site policies, procedures and any required specialized actions with the work to be done
- Show the ability to recognize any hazards and/or unsafe acts
- Are able and willing to challenge their employees on the job if they do not meet site procedures, policies, or other requirements and will see that the stop-work authority is enforced
- Participate actively in the behavior-based safety process

Note: A mentor will keep a helpful eye on new hires in your crew. Take time to describe the layout of the project, the best method to access the work, or how to work a tool they have never used before.

Subcontractor Management

Subcontractors hired by the Company will adhere to applicable policies and procedures put in place regarding SSEs.

Subcontractors working on-site will have assigned mentors who monitor their employees only. Mentoring of outside employees will be done on an individual basis and as required. They will also be managed by this policy.

REQUIREMENTS

SSE Plan

Mountain States Casing Company, LLC has established this Short-Service Employee (SSE) plan to verify all work is being carried out safely by requiring SSE supervisors to:

- Communicate the SSE policy and procedure at all pre-job meetings.
- Submit the crew/group makeup and all SSE form(s) to the on-site representative of the work owner for approval.
- Ensure the on-site representative validates the crew/group makeup and experience level.
- See that the on-site representative approves the SSE variance form.
- Make sure the on-site representative posts the forms to the appropriate database if required.

SSE Review

To ensure each Short-Service Employee is progressing satisfactorily through the SSE program, the Company will document progress of everyone from start to completion.

Based on the unique characteristics of the assigned work of the SSE, a checklist will be developed for each SSE employee with a record of milestone requirements met. These requirements, based on the unique assigned area, group, or work, such as:

- Receiving the required safety orientation
- Attending the required safety training
- The SSE demonstrates the ability to do the job required
- SSE can use tools/machines/equipment safely
- The ability to identify the hazards at the work site and how to protect oneself.

Additional key milestones will be added.

Program Review

This Short Service Employee Program will be reviewed on a regular basis to ensure the practices are kept up to date by performing the following:

- Continuous monitoring of the SSE
- Ensuring all changes/updates to the forms are submitted before beginning work and whenever a change may occur thereafter

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Short-Service Employees will be provided required PPE with proper fitting at the expense of the employer. SSE will receive training in:

- PPE that is required in various locations
- How to inspect, don, doff clean and maintain required PPE

TRAINING

Short-Service Employees will be properly trained in the knowledge and skills necessary to conduct their assigned jobs safely and efficiently.

Training will include:

- Federal, state, industry and company requirements
- Hazard(s) present in the workplace.
- The policies, procedures and processes utilized to control these hazards and prevent illnesses, injuries, property damage and/or environmental incidents.
- The proper use of PPE and all its requirements

Contractor Short-Service Employee Form & Variance

A supervisor will complete and submit this form to work owner supervision for approval prior to arrival on location. The work owner supervision will approve the individual SSE before he/she arrives on location.

I SSE Information					
Contractor Company Name:					
SSE Name:					
Request Date:	Date of Employment:		Current Job Title:		
Years Related Experience	Yrs.	Months	**Experience in Current Position**	Yrs.	Months
Is this worker in compliance with your Substance Abuse Policy?				☐ Yes	☐ No
Have site owner, contractor and HSE policies been reviewed with SSE?				☐ Yes	☐ No
Assigned Mentor's Name:			**Mentor's Experience**:	Yrs.	Months

List all training provided to the SSE:	**List any previous special training:**

SSE(s) identified by: **Hard Hat**-High Visibility **Vest**-High Visibility	Other:	Color;

II. SSE Crew Composition Requirements	
Choose one (1) of the crew types below. If any of the stated limitations are exceeded, proceed to the variance form on next page.	
Single person crew-cannot be an SSE (Variance Required)	
2-4-person crew-no more than one (1) SSE	
5 or more-person crew-no more than 20% SSE(s) per crew	
Exceeding 20% SSE per crew (Variance Required)	
III. SSE Review and Approval	
Contractor Supervising Manager:	Date:
CPL Work Location Supervisor:	Date:
Work Owner:	Date:
IV. Contractor SSE Form Repository	
CSM Data Base:	Date:
CPL Work location	Date:
Work Owner file:	Date:

This form is to be filled out whenever the conditions on this form or any other element of the Short Service Employee Policy cannot be met.

IV. Variance Information	
Variance Justification (What are the current circumstances and what will be done to ensure an acceptable level of risk?)	
Alternatives to Variance (If the variance is denied, what are the alternatives to completing the scope of the work? Briefly detail the cost and operational impact of the alternatives.)	

List the steps to be taken to manage/mitigate the SSE risk to an acceptable level:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

V. Variance Review and Approvals

Variance Expiration Date:

Contractor Manager/Supervisor

Approves Denies

Signed: _____ Date: _____

Work Owner's on-site representative Approves Denies

Signed _____ Date: _____

Note: For large jobs, please use a separate sheet to list all SSEs on the crew by name and job title.

Training Record

Trainer:
Signature:
Date:
Content of Training:
Attendees

Print Name:	Signature:

POLICY

Mountain States Casing Company, LLC will use Ground Fault Circuit Interrupters (GFCI) on all job sites when possible. When GFCI equipment is infeasible, the Assured Equipment Grounding Conductor Program (AEGCP) with the following guidelines, procedures, engineering controls and work practices will be enforced to eliminate injuries from malfunctions, improper grounding and defective electrical tools and systems.

RESPONSIBILITIES

“As Designated” is the Competent Person in charge of the AEGCP.

TRAINING

“As Designated” will provide training to ensure that the grounding requirements, purpose, function and proper use of tools to be used in the normal function of their jobs are understood by employees and that the knowledge and skills required for the safe application and usage are acquired.

PROCEDURES

- A written description of this program is available on the job site for inspection or copying by OSHA and any affected employee from “As Designated” upon request.
- This AEGCP applies to all Mountain States Casing Company, LLC sites, covering all cord sets and receptacles that are not part of the building or structure, and equipment connected by cord and plug which are available for use or used by employees.
- Mountain States Casing Company, LLC will not provide or allow employees to use equipment that does not meet the AEGCP requirements.

Installation

Equipment grounding conductors will be installed as follows:

All 120-volt, single-phase, 15- and 20-amp. receptacles will be of the grounding type and their contacts will be established by connection to the equipment-grounding conductor of the circuit supplying the receptacles in accordance with the applicable requirements of the National Electrical Code.

All 120-volt cord sets (extension cords) will have an equipment-grounding conductor that will be connected to the grounding contacts of the connector on each end of the cord.

The exposed noncurrent-carrying metal parts of the 120-volt cord and plug-connected tools and equipment that are likely to become energized will be grounded in accordance with the applicable requirements of the National Electrical Code.

Inspections and Tests

Each day, before use, employees are required to visually inspect each extension cord, or other device and any equipment connected by cord and plug, for external defects, such as deformed or missing pins or insulation damage, and signs of possible internal damage. Cord sets, devices, and receptacles that are fixed and not exposed to damage are exempt from this inspection. Employees are prohibited from using damaged or defective equipment. Any equipment found to be damaged or defective will be immediately tagged “DO NOT USE” and removed from service.

Inspections and tests performed as required by this program will be recorded as to the identity of each receptacle, cord set, and cord and plug connected equipment that passed the test and will indicate the last date tested or interval for which it was tested. This record will be kept by means of logs, color-coding, or other effective means and will be maintained until replaced by a more current record. These records will be made available at the job site for inspection by OSHA and any affected employees.

Testing Schedule

All required tests will be performed by a competent person: All equipment grounding conductors will be tested for continuity and will be electrically continuous. Each receptacle and attachment cap or plug will be tested for correct attachment of the equipment grounding conductors. The equipment grounding conductor will be connected to its proper terminal:

- Before first use
- Before equipment is returned to service following any repairs
- Before equipment is used after any incident that can be reasonably suspected to have caused damage (for example, when a cord set is run over)
- At intervals not to exceed three (3) months, except that cord sets and receptacles that are fixed and not exposed to damage will be tested at intervals not exceeding six (6) months

Test Records

- A log will be kept on the job site of all tests performed. These records will be kept until replaced by a newer record. The log will include:
  - Pass/Fail record of each receptacle, cord set and cord- and plug-connected equipment that was tested
  - Date of testing or test intervals
  - The equipment will be marked with the test date, or a color-coded tape will delineate the most recent test, for example

WINTER	White
SPRING	Green
SUMMER	Red
FALL	Orange

TRAINING RECORD

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

This space is intentionally left blank for printing purposes

POLICY

Mountain States Casing Company, LLC is committed to the safety and health of our employees and to preventing the spread of bloodborne pathogens by eliminating occupational exposure to blood and other potentially infectious materials (OPIM). Therefore, Mountain States Casing Company, LLC adheres to the following bloodborne pathogen policy and Exposure Control Plan (ECP).

To eliminate occupational exposure to OPIM, all employees will follow the policy of universal precautions, which is assuming all blood and body fluids are infectious and taking the necessary precautions to not contact them without the proper personal protective equipment (PPE). Employees will also properly disinfect themselves and the environment afterwards. Mountain States Casing Company, LLC will communicate the location of the ECP to all employees and inform them it is readily available upon request.

If employees, such as those designated as responsible for first aid and medical assistance or those doing work in certain medical or sanitation facilities are exposed to bloodborne pathogens, all measures within this program will be taken to prevent the spread of disease. “As Designated” is responsible for evaluating the effectiveness of the program and maintaining all records.

RESPONSIBILITIES

Employer Responsibilities

- Enact and enforce an ECP to prevent occupational exposure to OPIM
- Identify employees who may reasonably be anticipated to come into contact with blood and other OPIM
- Provide for post-exposure evaluation and follow-up should an employee be exposed to OPIM
- Ensure employees receive appropriate bloodborne pathogens training
- Ensure an adequate supply of PPE
- Ensure that all records required by this section shall be made available upon request of employees, Assistant Secretary, and the Director for examination and copying. Medical records must have written consent of employee before being released

Safety Committee Responsibilities

- Develop and implement a site-specific ECP
- Identify employees who may reasonably be anticipated to come into contact with blood and other OPIM
- Develop, conduct, and document training for bloodborne pathogens safety
- Investigate exposure incidents and recommend work-practice changes
- Make exposure determinations without regards to the use of PPE
- Recommend PPE if necessary

Employee Responsibilities

- Offer input on ECP as appropriate, including identification, evaluation and selection of new control methods
- Follow all elements of the bloodborne pathogens policy and training
- Notify a supervisor if they encounter any problems or concerns related to this policy

TRAINING

Mountain States Casing Company, LLC shall provide training to all employees who are exposed, or potentially exposed, to infectious materials and assures employee participation in the BBP training program. Mountain States Casing Company, LLC will provide this training at no cost to the employee during working hours.

Training will be provided uponhire, at the time of assignment to or before working on tasks where occupational exposure may take place, and annually thereafter. Mountain States Casing Company, LLC will provide additional training when tasks or procedures are added or changed that affect the employee's occupational exposure. It is acceptable for additional training to be limited to addressing only the changes or additions to the employees' exposure. Mountain States Casing Company, LLC will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees. Training records shall be documented and retained for a minimum of three (3) years.

Training Components

The training program will contain, at a minimum, the following elements:

- An accessible copy of the regulatory text of CFR 1910.1030, this bloodborne pathogen policy and ECP, and an explanation of its contents.
- A general explanation of the epidemiology and symptoms of bloodborne diseases.
- An explanation of the modes of transmission of bloodborne pathogens.
- An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other OPIM.
- An explanation of the use and limitations of methods to prevent or reduce exposure, including engineering controls, work practices, and PPE.
- Information on the types, proper use, location, removal, handling, decontamination, and disposal of PPE.
- An explanation of the basis for selection of PPE.
- Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge to employees who face occupational exposure.
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or other OPIM.
- An explanation of the procedures to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available.
- Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident.
- An explanation of the applicable signs, labels, and/or color coding.
- An opportunity for interactive questions and answers with the person conducting the training session.
- The person conducting the training will be knowledgeable in the subject matter of the training program as it relates to the workplace.

Training Records

"As Designated" is responsible for maintaining all Mountain States Casing Company, LLC training records. Training records will include the following information:

- Dates of the training sessions.
- Contents or a summary of the training sessions.
- Names and qualifications of persons conducting the training.
- Names and job titles of all persons attending the training sessions.
- Employee training records will be maintained for three (3) years from the date on which the training occurred.

SAFE PRACTICES

Exposure Determination

It is crucial to determine which jobs expose an employee to blood and other OPIM, as well as the means by which that exposure might occur. Accordingly, the Mountain States Casing Company, LLC safety committee or management will determine which job classifications can reasonably expect occupational exposure to OPIM. The following will be determined and documented:

- Job classifications in which all employees have occupational exposure.
- Job classifications in which some employees have occupational exposure.
- Tasks and procedures in which occupational exposure occurs.
- Further, input from non-managerial employees exposed to contaminated sharps and infectious material is vital to the success of this ECP, and every employee is encouraged to offer suggestions that will help the effectiveness of the ECP.

The various types of bodily fluid that an affected employee may reasonably be exposed to, such as blood, mucus, and saliva, must be included in the ECP.

Engineering and Work Practice Controls

As part of this ECP, Mountain States Casing Company, LLC will seek methods to eliminate occupational exposure to the greatest extent possible and will examine, regularly maintain, or replace engineering controls to ensure their effectiveness.

Handwashing

- Mountain States Casing Company, LLC will provide accessible handwashing facilities to every employee. If providing handwashing facilities is not feasible, Mountain States Casing Company, LLC will provide antiseptic towelettes or an appropriate antiseptic hand cleanser in conjunction with clean cloth or paper towels.
- For construction projects, employers must: provide onsite general washing facilities (one per 20 employees), keep them in sanitary condition, and provide suitable cleaning agents/towels for the removal of hazardous and other substances.

- In addition to basic workplace hygiene requirements, employees will wash their hands as soon as possible after removing gloves or other PPE.
- Ifan employee's skin or mucous membrane is exposed to OPIM, the employee will immediately wash their skin with soap and water or flush their mucous membranes with water.

Sharps

- Employees will handle and dispose of contaminated sharps in a way that prevents unnecessary exposure to hazards. Employees will not bend, recap, or remove contaminated sharps unless no alternative is feasible, and it can be done using a mechanical device or one-handed technique.
- As soon as possible after use, contaminated reusable sharps will be placed in a container that is puncture-resistant, labeled or color-coded appropriately, leak-proof on the sides and bottom, and made so employees cannot reach into it.

Other Engineering and Work-Practice Controls

- Do not store food or drink, eat, drink, smoke, apply cosmetics or handle contact lenses near possible exposures.
- Employees may not use their mouths to suck up OPIM.
- Containers used to store, or transport OPIM will be closable, prevent leaks, be appropriately labeled or color-coded, and puncture-resistant.
- Employees will examine any equipment that may be contaminated before servicing or shipping and will decontaminate it as necessary and feasible. If decontamination is impossible, the employee will attach a label to the equipment, and inform all appropriate employees of the contamination to ensure they take proper precautions.

PPE

Employees must be provided with properly fitting PPE, including gloves, masks, gowns, etc. Specifically:

- When there is occupational exposure, the employer shall provide, at no cost to the employee, appropriate personal protective equipment. The employer shall ensure that PPE is used, unless the employee temporarily and briefly declined to use PPE in rare circumstances. The employer shall repair or replace PPE as needed to maintain its effectiveness.
- Appropriate PPE is impermeable to blood or OPIM under normal conditions and durations.
- PPE will be provided and maintained free to employees in appropriate sizes, and provisions will be made should an employee be allergic to gloves normally provided.
- An employee may decline using appropriate PPE under "rare and extraordinary circumstances" when PPE use might prevent the delivery of health care or public safety services. These exceptions will be investigated and documented to prevent future occurrences.
- PPE will be removed as soon as feasible before leaving the general work area. After removal, the employee will place contaminated PPE in an appropriate area or container to be stored, washed, decontaminated, or disposed of.

Gloves

Employees must wear gloves if they anticipate hand contact with OPIM. Do not reuse single-use gloves, and replace them as quickly as possible if they are torn, punctured, or compromised. Utility gloves can be reused if intact. Gloves will also be used during phlebotomy in specific situations, such as cuts, potential contaminations, and during training.

Masks, Eye Protection, and Face Shields

Employees will wear masks, together with proper eye-protection devices, whenever splashes, sprays, spatters, or droplets of blood or other OPIM may be generated, and there is a reasonable anticipation of contamination of the eyes, nose, or mouth.

Gowns, Aprons, etc.

Employees will wear appropriate protective clothing, such as gowns or clinic jackets, whennecessary; the type of protective clothing is determined by the nature of exposure and will be sufficient to protect against occupational exposure.

For situations with a risk of gross contamination, employees must also wear surgical caps or hoods and shoe covers or boots to ensure comprehensive protection.

Housekeeping

All equipment shall be cleaned and decontaminated after contact with blood or other OPIM.

Employees will use an appropriate disinfectant to clean and decontaminate contaminated or potentially contaminated work surfaces after any spill of infectious materials and at the end of the work shift. Mountain States Casing Company, LLC will replace protective surface coverings as soon as possible if they are contaminated. Bins, cans, pails, or other receptacles that may become contaminated will be inspected and decontaminated regularly, in addition to being decontaminated as soon as feasible after visible contamination. Employees must not pick up any broken glassware that may be contaminated by hand; they will use a brush, dustpan, or tongs instead.

Employees will keep the workplace clean and sanitary. Mountain States Casing Company, LLC will implement a written schedule for cleaning and decontamination based on the demands of the site.

Laundry

All equipment and laundry shall be cleaned and decontaminated after contact with blood or other OPIM.

Employees will handle any contaminated laundry as little as possible. They must put such laundry into a color-coded or labeled container at the site where it was used. Wet laundry will be placed into a leak-proof container. Employees handling contaminated laundry must use appropriate PPE. Employees must never take or wear contaminated clothing outside of the work site.

HEPATITIS B VACCINATION

Mountain States Casing Company, LLC will make available the hepatitis B vaccination series at no cost to any Mountain States Casing Company, LLC employee who faces occupational exposure. If not vaccinated, employees will be informed of the opportunity to be vaccinated within 24 hours of an exposure incident.

An employee occupationally exposed to OPIM may decline the hepatitis B vaccine but must sign a declination statement to be kept on file. Anyone who declines vaccination may request and receive the vaccination later at no cost.

Medical records relating to employees' hepatitis B vaccination status and post-exposure evaluation and follow-up must be kept for 30 years plus the duration of employment.

POST-EXPOSURE EVALUATION AND FOLLOW UP

Should an exposure incident occur, the employee will contact "As Designated" (or designate) immediately.

In Case of Exposure

A licensed health care professional will conduct a confidential medical evaluation and follow-up and will provide a medical opinion on diagnosis/course of action, as soon as possible following an exposure incident. After administering initial first aid (cleaning the wound, flushing the eyes or other mucous membranes, etc.), follow the procedure below:

1. Document the routes of exposure and how the exposure occurred.

2. Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).

3. Obtain consent and arrange to have the source individual tested as soon as possible to determine human immunodeficiency virus (HIV), hepatitis C virus (HCV), and hepatitis B virus (HBV) infectivity; convey and document conveyance of the source individual's test results to the employee's health care provider. If the source individual is known to be HIV, HCV, and/or HBV positive, new testing is not necessary.

4. Provide the exposed employee with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).

5. After obtaining consent, collect the exposed employee's blood as soon as feasible after an exposure incident, and test the blood for HBV and HIV serological status. This will establish a baseline for periodic testing over the next six months. Depending upon the circumstances of the exposure, post-exposure prophylaxis may be recommended to reduce the risk of infection from HIV or HBV.

6. If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

Administrative Responsibilities Following Exposure

Mountain States Casing Company, LLC will ensure that the healthcare professional responsible for post-exposure evaluation and follow-up receives the following:

- That the employee has been informed of the results of the evaluation.
- That the employee has been told about any medical conditions resulting from exposure to blood or other OPIM which require further evaluation or treatment.

All other findings or diagnoses shall remain confidential and shall not be included in the written report.

Counseling

Mountain States Casing Company, LLC will ensure that post-exposure counseling is given to employees following an exposure incident. Counseling will include Centers for Disease Control and Prevention (CDC) recommendations for prevention and transmission of bloodborne infections, including HIV, HBV and HCV. Counseling must be made available regardless of the employee's decision to accept serological testing.

RECORDKEEPING

Medical Records

Mountain States Casing Company, LLC will maintain a confidential medical record for every employee with occupational exposure that will include at least the following:

- Name and social security number of the employee.
- Copy of the employee's HBV status (with dates of all hepatitis B vaccinations).
- Copy of all post-exposure documentation and healthcare professional's written opinion.
- Copy of the information provided to the healthcare professional.
- Do not share or report this record unless the employee provides written consent.

Is responsible for maintaining all Mountain States Casing Company, LLC medical records.

Sharps Injury/Exposure Incident Log

A Sharps Injury Log is a record of each exposure incident involving a sharp. The purpose of the Sharps Injury Log is to generate a record of exposure incidents that will include enough information about the cause of the incidents to allow the Company to analyze them and take preventive action.

The Sharps Injury Log must include:

- The date and time of the sharps-related exposure incident.
- The type and brand of the sharp involved in the incident.
- A description of the incident including:
  - The job classification of the exposed employee.
  - The department or work area where the incident occurred.
  - The procedure being performed.
  - How the incident occurred.
  - The body part injured.
  - For sharps with engineered sharps injury protection (ESIP) if the safety mechanism was activated.
  - If the incident occurred before action, during activation, or after activation of the mechanism. For sharps without ESIP, include the employee's opinion on whether ESIP will have prevented the injury.

Sharps injuries/exposures must be recorded on the log within 14 working days of when the incident was reported to the employer.

The Sharps Injury Log must be maintained for five (5) years from the date of the exposure incident.

HAZARD COMMUNICATION

Label containers of regulated biological waste, any container used to store or transport OPIM, as well as contaminated equipment, to prevent exposure. Labels for such containers will include the legend depicted in Figure 1.

All such labels will be fluorescent orange or orange-red and be attached on, or as close as feasible to, the container.

Figure 1

REVIEW AND UPDATE OF ECP

The Mountain States Casing Company, LLC safety committee will review this ECP and update it at least annually, and whenever necessary, to reflect new or changed tasks and procedures that affect occupational exposure.

Reviews and updates will:

- Reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens.
- Document the annual consideration and implementation of effective medical, and commercially available, devices and services designed to eliminate or minimize occupational exposure.

Mountain States Casing Company, LLC will seek the input of non-managerial employees to identify, evaluate, and select controls to reduce occupational exposure. This input will be documented as part of this ECP.

ATTACHMENTS

- ECP Documentation
- Declination Statement
- Exposure Incident Report
- Evaluating Physician’s Written Opinion
- Sharps Injury Log

These forms may be reproduced for the purposes of implementing and maintaining a safety and health program.

ECP Document Form

Exposure Determination	
Jobs in which all employees have occupational exposure to OPIM	**Task or procedure where exposure occurs**
Jobs in which some employees have occupational exposure to OPIM	**Task or procedure where exposure occurs**
Engineering controls and work practice controls:	
The following types of PPE are available in the following locations:	
Personal Protective Equipment	**Location**

Hepatitis B Declination Statement Form

Declination Statement	
I understand that, due to my occupational exposure to blood or other OPIM, I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine at no charge to myself. However, I decline Hepatitis vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future, I continue to have occupational exposure to blood or other OPIM and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.	
Employee Signature:	Date:

Declination Statement	
I understand that, due to my occupational exposure to blood or other OPIM, I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine at no charge to myself. However, I decline Hepatitis vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future, I continue to have occupational exposure to blood or other OPIM and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.	
Employee Signature:	Date:

Declination Statement	
I understand that, due to my occupational exposure to blood or other OPIM, I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine at no charge to myself. However, I decline Hepatitis vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future, I continue to have occupational exposure to blood or other OPIM and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.	
Employee Signature:	Date:

Exposure Incident Report Form

(Routes and Circumstances of Exposure Incident)—Please Print		
Employee's Name	Date	
Date of Birth	SS#	
Telephone (Business)	(Home)	
Job Title		
Date of Exposure	Time of Exposure	AM | PM
Hepatitis B Vaccination Status		
Location of Incident		
Describe job duties you were performing when the exposure incident occurred		
Describe the circumstances under which the exposure incident occurred		
What happened that resulted in the incident?		
What body fluid(s) where you exposed to?		
What was the route of exposure? (e.g., mucosal contact, contact with non-intact skin, percutaneous)?		
Describe any personal protective equipment in use at time of exposure incident		
Did PPE fail?	If yes, how?	
Identification of source individual(s) (names)		
Other pertinent information		

Evaluating Physician's Written Opinion Form

To the Evaluating Physician:

This employee may have suffered an exposure incident to a Bloodborne Pathogen. In accordance with OSHA standards covering post-exposure evaluation and follow up, the following documents are provided for you:

- A copy of OSHA regulations covering Occupational Exposure to Bloodborne Pathogens
- A description of the exposed employee's duties as they relate to the exposure incident
- Documentation of the routes of exposure and circumstances under which exposure occurred
- Results of the source individual's blood testing, if available
- All medical records relevant to this employee's appropriate treatment, including vaccination status

After you have determined whether there are contra-indications to vaccination of this employee with Hepatitis B vaccine, please state in the space below if:

Vaccine was indicated:	Vaccine was received:

(All other findings are to remain confidential and are not to be included on this page.)

Please return this sheet to this employee.

Thank you for your evaluation of this employee.

Physician's Name (printed):	Date:
Physician's Signature:	

Sharps Injury Log

Facility/Location:				Year:
Address:				
City:			State:	ZIP:

Date	Time	Type, Brand, Model of Sharp Device	Department/ Work Area	Description of How Incident Occurred

(Retain at least 5 years)

TRAINING RECORD

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

POLICY

The compliance of all employees with Mountain States Casing Company, LLC Safety and Health Program is mandatory and will be considered a condition of employment. All safety rules, procedures, and plans in effect are to be followed as specified in the safety program. Employees found to violate Company safety policy may be subject to penalty.

RESPONSIBILITIES

“As Designated” is the supervisor for disciplinary actions and any employee in a position of management or supervisory capacity may initiate disciplinary action against any employee found to violate Company policy. Not following verbal or written safety procedures, guidelines, rules, horseplay, failure to wear selected Personal Protective Equipment (PPE), abuse of selected PPE, etc. constitutes a safety violation.

TRAINING

The importance of safe work practices and the consequences of failing to abide by safety rules will be covered in the New Employee Safety Orientation and at Tailgate/Toolbox Safety Training. This will help ensure that all employees understand and abide by The Company's safety policies.

Employees who are observed performing unsafe acts or not following proper procedures or rules will be retrained by their foreman or supervisor. A Safety Contact Report may be completed by the supervisor to document the training. If multiple employees are involved, additional safety meetings will be held.

PROCEDURES

The following outlines the disciplinary measures which will be taken against employees found to be in violation:

Periodic safety inspections of the workplace and equipment will be undertaken to ensure that all personnel, including supervisory positions, are demonstrating the required commitment to safety. General neglect of safe work procedures, practices, and requirements in the workplace, or neglect of equipment safety, will be viewed as a lack of supervisory enforcement of safety policy and the appropriate supervisor/management personnel will be subject to the same disciplinary procedures described below.

These programs will be used for employee compliance with the safety program and all safety rules: training programs; retraining; optional safety incentive programs and disciplinary action.

Safety Incentive Programs

Although strict adherence to safety policies and procedures is required of all employees, The Company may choose to periodically provide recognition of safety-conscious employees and job sites without accidents through a safety incentive program.

Disciplinary Action

The failure of an employee to adhere to safety policies and procedures established by Mountain States Casing Company, LLC can have a serious impact on everyone concerned. An unsafe act can threaten not only the health and well-being of the employee committing the unsafe act but can also affect the safety of his/her coworkers and/or customers. Accordingly, any employee who violates any of The Company's safety policies will be subject to disciplinary action.

When a “Safety Violation Notice” is issued, appropriate supervisory personnel will meet with the employee(s) to discuss the infraction and inform the individual(s) of the rule or procedure that was violated and the corrective action to be taken.

Note: Failure to promptly report any on-the-job accident or injury, on the same day as occurrence, is considered a serious violation of the Company’s Code of Safe Practices. Any employee who fails to immediately report a work-related accident or injury, no matter how minor will be subject to disciplinary action.

Employees will be disciplined for infractions of safety rules and unsafe work practices that are observed, not just those that result in an injury. Often, when an injury occurs, the accident investigation will reveal that the injury was caused because the employee violated an established safety rule and/or safe work practice(s).

In any disciplinary action, the foreman will be cautious that discipline is given to the employee for safety violations, and not simply because the employee was injured on the job or filed a Workers’ Compensation claim.

Violations of safety rules and the Code of Safe Practices are to be considered equal to violations of other Company policies. Discipline for safety violations will be administered in a manner that is consistent with the Company’s system of progressive discipline. If, after training, violations occur, disciplinary action will be taken as follows:

- Oral warning. Documented, including date and facts on the “Safety Warning Report” form. Add any pertinent witness statements. Restate the policy and correct practice(s)
- Written warning. Retrain as to correct procedure/practice
- Written warning with suspension
- Termination

As in all disciplinary actions, each situation is to be carefully evaluated and investigated. The particular step taken in the disciplinary process will depend on the severity of the violation, employee history, and regard for safety. Foremen and superintendents will consult with the office if there is any question about whether or not disciplinary action is justified. Employees may be terminated immediately for willful or extremely serious violations. Union employees are entitled to the grievance process specified by their contract.

Note: Consistency in the enforcement of safety rules will be exercised at all times.

Employee Safety Warning Report

Employee's Name			Position	
Date of Warning	Violation Time		Violation Date	
Supervisor			Department	
Type of Warning	☐ Verbal	☐ Written	☐ Serious	☐ Other:
Type of Violation	☐ Unsafe Act	☐ Improper Safety Attire	☐ Unsafe Condition	☐ Other:

Supervisor's Statement:

Employee's Statement

I ☐ AGREE / ☐ DISAGREE with the Supervisor's statement (explain below)

Previous Warnings

First Warning	Date	Warned by:	Retrained? ☐ Yes ☐ No	Date Retrained:
Reason for Warning:				
Second Warning	Date	Warned by:	Retrained? ☐ Yes ☐ No	Date Retrained:
Reason for Warning:				
Third Warning	Date	Warned by:	Retrained? ☐ Yes ☐ No	Date Retrained:
Reason for Warning:				

The Supervisor must complete this form immediately after the employee has been interviewed. A decision must be made on the following to ensure violators will not participate in the current safety incentive program.

☐ No further action	☐ Suspension	☐ Suspension from current safety incentive program	☐ Dismissal	☐ Other:

Acknowledgement

I have read and understand this warning decision.

_____ _____

Employee's Signature Date

_____ _____

Supervisor's Signature Date

Copy Distribution:	☐ Employee	☐ Employee's Supervisor	☐ Personnel Department	☐ Safety Committee

Submit this form for review at the next Safety Committee meeting.

Safety Committee Notes:

TRAINING RECORD

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

POLICY

Mountain States Casing Company, LLC has implemented this policy to inform employees of the written driving safety program in the workplace. This ensures the safety and health of the employees on the job site.

RESPONSIBILITIES

Driving safety is a responsibility shared between the Company and its employees.

Employer Responsibilities

- Ensuring all employees are physically fit and capable to perform the job duties assigned
- Ensuring employees possess valid driver's licenses for the class of vehicle being driven
- Responding quickly to eliminate workplace hazards
- Ensuring all vehicles and equipment are kept in good safe working order
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness
- Ensuring the vehicles are large enough and designed for how they are used

Supervisor Responsibilities

- Establishing and maintaining safe and healthful working conditions
- Monitoring employee work behaviors using behavior-based safety tools
- Ensuring employees are not impaired by illness or medication use
- Setting good examples, instructing their employees, making sure they fully understand and follow safe procedures

Employee Responsibilities

- Obey all traffic laws and follow to common rules of the road.
- Notifying their supervisors if they are fatigued to the point of not being able to perform their duties safely.
- Ensuring they are physically and mentally fit to perform their job functions safely; they will take responsibility for their own safety as well.
- Notifying their supervisor if they are taking prescription or over-the-counter medications
- Each employee will possess a valid driver's license.
- No employee will undertake a job that appears to be unsafe.
- Employees are to report to a superior or designated individual all unsafe conditions encountered during work.
- Seatbelts will be used by the driver and all passengers and properly maintained.

SAFE PRACTICES

Driver Requirements

Mountain States Casing Company, LLC will only allow authorized employees to drive a motor vehicle in the course and scope of the work to be performed or operate a Company-owned vehicle.

Each driver will be appropriately assessed, licensed and trained to operate the Company vehicle. The driver's license of each driver will be valid and kept current. All drivers will undergo a medical assessment that will be kept on file based on jurisdictional requirements.

Authorized drivers will be prohibited from operating a motor vehicle while under the influence of any of the following that might impair their driving skills:

- Alcohol
- Illegal drugs
- Prescription or over-the-counter medications without prior approval

Authorized drivers will report to the appropriate employee any of the following:

- Collision
- Traffic violation
- Near miss incident

Seat belts will always be worn by all occupants whenever the vehicle is in motion.

Vehicle Requirements

The Company vehicle will be fit for the purposes intended and will be maintained in a safe working order.

When transporting loads, the load will be secured and will not exceed the manufacturers load specifications, or the legal limits for the vehicle.

Safe Driving Practices

All authorized drivers will obey all traffic laws and follow safe driving practices and safe driving behaviors including but not limited to:

- Cell phone use is prohibited while driving
- Do not manipulate radios or other equipment which may cause a distraction
- Do not exceed the posted speed limit
- Maintaining a safe distance between other vehicles
- Do not exceed the occupant capacity of the vehicle
- Safety when operating around railroad crossings (controlled and uncontrolled crossings), including navigating across uncontrolled/unprotected crossings with any/all special-use or tracked vehicles.
- Unless authorized, avoid positioning vehicles within 35 feet of hydrocarbon containing process equipment and piping. This requirement does not include refueling operations or buried equipment.
- Prior to driving a vehicle within 15' of above ground process equipment, 25' of wellheads, or 75' of flares the area shall be surveyed with a gas detection monitor.
- Vehicles shall not be left running within 15' of above ground process equipment, 25' of wellheads, or 75' of flares, without continuous monitoring left at the vehicle.
- Anytime vehicles are left idling unattended, you should engage the parking brake or utilize wheel clocks and if automatic transmission vehicle, place in park.

Backing Safety

Drivers are expected to take the best available safety precautions when backing a vehicle. Large vehicles, in particular, pose a greater risk when backing. Safe methods include, but are not limited to:

- Spotters
- Cameras
- Proximity Detection Systems
- Tag-based Systems
- Internal Traffic Control Plans

Spotters

For vehicles with an obstructed view, the use of spotters can be an effective means in protecting employees on foot behind vehicles. However, this places the spotters at risk for injury or death. Implementing the following actions will help keep spotters safe:

- Ensure that spotters and drivers agree on hand signals before backing up.
- Instruct spotters to always maintain visual contact with the driver while the vehicle is backing.
- Instruct drivers to stop backing immediately if they lose sight of the spotter.
- Do not give spotters additional duties while they acting as spotters.
- Instruct spotters not to use personal mobile phones, personal headphones, or other items that will pose a distraction during spotting activities.
- Provide spotters with Hi-Vis clothing, especially during night operations.

Spotting signals:

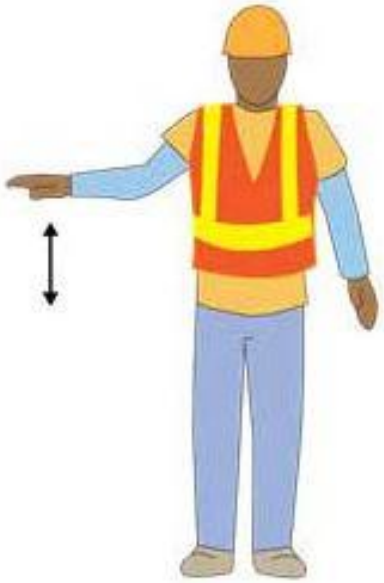
Back up

Back, turn left

Back, turn right

Move forward

Distance left to back



Slow down

Stop

Cameras

Many newer vehicles (as well as some types of mobile equipment) can accommodate a rear-view camera to provide operators with a view of what is behind them. Viewing screens can be mounted on the dash provided they do not obstruct the field of vision out of the windshield. Construction sites or mines may require the use of more rugged camera equipment. Determining where to mount a camera for maximum effectiveness may be difficult, especially on large vehicles. For example, dump trucks may require two (2) or three (3) cameras to monitor the blind spots on the front, rear and side of the vehicle.

Proximity Detection Systems

Radar and ultrasonic technology both are used in backing safety systems. A radar system transmits a signal, which is bounced off an object. A receiver then receives the signal. These systems alert the driver with a visual and/or audio warning. These systems will be positioned so that they will not detect harmless objects, such as the concrete slab of a driveway, which can interfere with the detection of an object or person behind the vehicle or mobile equipment. Also, the composition of an object can affect detection, with some materials being virtually invisible to radar. Like cameras, this equipment can be mounted on most vehicles and may be an option for some manufacturers.

Ultrasonic systems, such as sonar, emit bursts of ultrasonic waves in a frequency above the hearing threshold of humans. When the waves strike an object, they generate echoes used to determine the distance to the object. These systems alert the driver with a visual and/or audio warning.

Tag-Based Systems

Another type of proximity detection system is an electromagnetic field-based system, which is a type of tag-based system. This system consists of electromagnetic field generators and field-detecting devices. One (1) electromagnetic field-based system uses electromagnetic field generators installed on a vehicle and electronic sensing devices (a tag) worn by employees working near the vehicle. Another electromagnetic field-based system uses field generators worn by persons working near the vehicle, with the sensing devices installed on the vehicle. These electromagnetic field-based systems can be programmed to warn affected employees, stop the vehicle, or both when employees get within the predefined danger zone of the vehicle.

Internal Traffic Control Plans

An internal traffic control plan (ITCP) is another method used to address back-over hazards. These are plans that project managers can use to coordinate the flow of moving equipment, employees and vehicles at a worksite to minimize or eliminate vehicles and employees from crossing paths. These plans can significantly reduce, or possibly eliminate, the need for vehicles to back up on a site.

SAFE PRACTICES

The Company recognizes that its greatest assets are its employees, a fact demonstrated by a commitment to their safety.

A driver safety program saves lives and reduces injuries. It also prevents material losses and helps the Company guard against the range of liabilities that may emerge from a vehicular accident.

Accordingly, management will provide the resources needed to support a culture of safety and will actively encourage employees to participate in the planning and implementation of the driver safety program.

If the Company operates any of the following types of commercial motor vehicles in interstate commerce, it will comply with applicable U.S. Department of Transportation (DOT) safety regulations, many of which may not be detailed in this chapter:

- A vehicle with a gross vehicle weight rating or gross combination weight rating (whichever is greater) of 10,0001 lbs. or more
- A vehicle designed or used to transport between 9 and 15 passengers (including the driver) for compensation
- A vehicle designed or used to transport 16 or more passengers
- Any size vehicle used in the transportation of materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act (49 U.S.C. 5101 et seq.) and which require the motor vehicle to be placarded under the Hazardous Materials Regulations (49 CFR chapter I, subchapter C)

Please see www.fmcsa.dot.gov or www.safetyservicescompany.com for more information.

FLEET

This Company will maintain a fleet of vehicles, if necessary, for business in accordance with relevant regulatory standards and vehicle manufacturer's advice.

Fleet Selection

The safety coordinator will work with members of the safety committee and, if appropriate, the Company's Insurance Company to establish guidelines for the selection of Company vehicles, which will include the following:

- The appropriate vehicle type for expected use
- Required safety equipment
- Maintenance procedures
- Inspection procedures
- Protections against unauthorized use
- Record-keeping procedures
- Insurance

The National Highway Transportation Administration provides information on vehicle safety according to make and model.

Preventive Maintenance

All Company vehicles will be maintained according to a regular schedule to ensure their safety and roadworthiness. All maintenance will be performed by a qualified individual or automotive shop according to the manufacturer's recommended service schedule.

In addition to regularly scheduled maintenance, fleet up-keep will include, but not be limited to:

- Basic inspections of the vehicle by the driver before every trip
- Immediate removal from service of any vehicle with mechanical problems
- Managerial certification of requested repairs before return to service

Recordkeeping

All vehicle maintenance, repair certification and driver review will be recorded and kept through the life of the vehicle.

Vehicle Inspection

The operator will inspect each vehicle or piece of equipment on a daily basis before and after operation. Pre-use inspections will include a walk around inspection to check for obvious defects and to ensure no obstacles are in the path of travel of the vehicle.

Each operator is responsible for the safe condition of the equipment. No employee may drive a vehicle having steering, brake, or other safety problems until a mechanic has made repairs. Drivers will report any other unsafe conditions to their supervisor as soon as safely possible.

Driver vehicle inspection reports will be completed daily, including documentation of repairs of defects and/or deficiencies found during these inspections. In addition. All vehicles will be inspected annually.

Hours of Service

Mountain States Casing Company, LLC will ensure compliance with all applicable "hours of service" regulations.

DRIVER SELECTION, QUALIFICATION AND EVALUATION

"As Designated" will work with members of the safety committee and, if appropriate, the Company's insurance Company to determine the qualification standards for motor vehicle operators.

Employment History

The evaluation for any new employee anticipated to drive a Company vehicle (or their own vehicle-on-company business) will include a reference check and review of driving history through past employers.

Licenses

Any driver of a Company vehicle or a personal vehicle on Company business will possess a valid driver's license appropriate for the vehicle that will be driven and the circumstances in which the vehicle will be driven. All government regulations and insurance Company requirements will be followed concerning driver qualification.

A driver will only operate a vehicle that requires a commercial driver's license (and any endorsement) if he or she is in possession of the appropriate license. All commercial drivers will be properly licensed for the vehicle that they will be operating.

Motor Vehicle Records (MVR)

The Company will check the driving records of any employee expected to drive for work. Further, all employees who operate a motor vehicle will be enrolled in an MVR monitoring program for continuous monitoring to assess if they remain eligible to drive a Company vehicle or their own on Company business.

Initial Assignment

The Company will request and review an MVR for new applicants or current employees expected to add driving to existing responsibilities, whether operating their own vehicle or a Company vehicle. The MVR review will consider the most recent three (3) years of driving and will include motor vehicle records from all states in which the applicant has lived in that time.

MVRs and the information contained therein will remain as confidential as possible. Discussions of motor vehicle records will be restricted to individuals with a legitimate “need to know”.

Any qualification standard may entail a multi-tiered or point system approach to driver eligibility based on the frequency of the employee’s anticipated work driving and the severity of traffic convictions recorded in the MVR.

Following are some examples of violations that, having occurred in the past 3 years, may warrant ineligibility to drive on Company business:

- DWI/DUI/OUI
- Negligent motor vehicle homicide
- Operating with a suspended license
- Using a motor vehicle for commission of a felony
- Aggravated assault with a motor vehicle
- Operating a motor vehicle without the owner’s consent
- Reckless, careless, or negligent driving, including speeding more than 15 MPH over limit
- Hit and run or leaving the scene of an accident with injury or death resulting, or property damage in excess of $1,000

Following are examples of violations that, having occurred more than three (3) times in two (2) years, may warrant ineligibility to drive:

- Minor moving violations
- Accidents

Review

Employees cited for a violation that may affect their eligibility to drive on Company business will inform their supervisor.

In addition to the initial MVR review, a continuous review of an employee’s MVR will be done to confirm the driver’s continued eligibility to drive for work.

Medical Check-Up

All Company drivers will be medically cleared to drive every 24 months.

Defensive Driver Training

The Company may consider or require the completion of a driver safety course or defensive driving course in determining eligibility to drive a Company vehicle or a personal vehicle while on Company business.

Driver Agreements

Employees who will operate a motor vehicle as part of their job are required to confirm awareness and understanding of the Company's driver safety policy.

The safety coordinator, with the safety committee, will create a "driver agreement" that allows a driver to confirm his or her awareness and understanding of this policy, driver expectations, vehicle maintenance and care requirements and the procedures for reporting moving violations and accidents.

Driver Qualification File

The Company will maintain a driver qualification file for every driver including all documents required to verify his or her qualifications.

Meetings

The safety coordinator, with the safety committee, will determine whether or under what conditions an employee may permit another individual to drive a Company vehicle.

A driver or other employee who permits an unauthorized individual to operate a Company vehicle faces disciplinary action and financial accountability for any costs incurred by allowing unauthorized employees to operate a Company vehicle.

Securing Materials

The driver will prevent the unsafe movement of any cargo, such as tools or equipment by securing it appropriately. Drivers will secure anything that may present a hazard outside the passenger compartment.

Vehicle Occupancy

No Company vehicle transports more passengers than safely possible. Every adult in the vehicle will have a seatbelt. If children will be transported, each will have the appropriate child safety restraint. Vehicles may be operated only if each passenger is safely restrained in their seat.

Seat Belts

The Company recognizes that seat belts effectively prevent injuries and loss of life in an automotive accident.

All Company employees will wear seatbelts when operating a Company-owned vehicle or any vehicle on Company premises or on Company business. Any occupant of a vehicle owned by the Company, on Company premises, or in a vehicle on Company business will wear a seatbelt or, if required, an appropriate child restraint system.

This Company encourages its employees to always wear a seatbelt when driving or riding in an automobile, to ensure child restraints are used properly and to encourage other passengers or drivers do the same.

Alcohol and Drug Use

During “duty hours”, which include working hours, break periods and on-call-periods, employees are forbidden to operate a motor vehicle under the influence of alcohol, illegal drugs, or prescription medication that can cause impairment or drowsiness. The consumption of alcohol or illegal drugs while performing Company business or while in a Company facility may result in disciplinary action up to and including termination. All drivers are prohibited from driving while impaired by illness, fatigue, drugs, alcohol, or other substances.

If an employee takes prescribed medication or over-the-counter medication known to affect the ability to operate a motor vehicle or other heavy machinery, the employee will inform his or her immediate supervisor and refrain from such duties until able to do so safely.

Drivers will remain aware of driving behaviors that indicate impairment such as weaving, inappropriate speed and erratic or abrupt driving. Staying a safe distance from drivers who may be impaired and bringing dangerous drivers to the attention of the authorities helps keep roads safe.

Drivers who operate a commercial motor vehicle as defined by the Federal Highway Administration (FHA) will possess a commercial driver’s license (CDL) and are subject to FHA’s regulations on alcohol and drug use and testing.

A drug-free workplace policy and supporting procedures will be in place and communicated to all employees before drug testing. The rule requires pre-employment, reasonable suspicion, random, post-accident, return-to-duty and follow-up testing. For details on the program, refer to the Federal Motor Carrier Safety Regulations, Title 49, Part 382.

Distracted Driving

Driving skills rely on the focus of the vehicle operator. Every driver will devote his or her full attention to the task of driving while behind the wheel. Text messaging while driving is strictly prohibited. Drivers will not engage in texting or the use of hand-held mobile phones while driving. Distractions come in many forms and contribute to 25 to 30 percent of all traffic accidents. Distractions include, but are not limited to the following:

- Text messaging and other cell phone use (even with hands-free headset)
- Reaching for an object inside the vehicle
- Looking at an object, person, or event outside the vehicle
- Eating and drinking
- Reading
- Grooming and hygiene
- Electronics use (computer, tablet, GPS)
- Adjusting non-critical controls
- Horseplay
- Emotional distractions

Fatigued Driving

Driving fatigue greatly increases the risk of an accident. All drivers will be trained in the importance of being well rested, alert and sober. Also, the importance of being able to continually search the road for any potential situations requiring quick action.

To prevent fatigue, drivers will stop every two (2) hours and get out and stretch by taking a walk.

Drivers are required to follow the FMCSA Hours of Service Drivers Final Rule and take a 30-minute break after eight (8) hours of driving time.

Aggressive Driving

The Company prohibits aggressive driving while operating a Company vehicle or a personal vehicle on Company business. Aggressive driving behaviors include, but are not limited to the following:

- Excessive Speed
- Tailgating
- Failure to signal lane change
- Running a red light
- Passing on the right
- Any offensive, rude, or hostile act or gesture directed at another driver

Young Drivers

Teenage drivers are the most likely to engage in risky driving behaviors and vehicle crashes are the leading cause of death for 15- to 20-year-olds. Federal law prohibits drivers under 17 years old to operate a vehicle as part of their job and it is at the discretion of the safety coordinator to prohibit driving for any employee based on a lack of driving experience.

Driving in Work Zones

All drivers in work zones will take special care. Patience and care go a long way to contribute to driving safely around construction. Heavy machinery and employees can slow everything down but driving rushed makes it difficult to observe other employees and leads to poor decision making. Employees will be vigilant and minimize distractions to respond quickly to the unexpected when behind the wheel, especially when driving where others are working.

MONITORING

As part of our driver safety policy, every work-related accident and near miss involving motor vehicles will be handled in a way to reduce risk and encourage future safe behaviors in the future. While operating a vehicle for Company purposes, drivers will have at least one mode of contact in the vehicle including, but not limited to: cell phone, CB radio, or two-way radio.

Additionally, the Company’s driver safety policy requires periodic review of the policy itself and its impact on the safety and health of employees.

Incident, Accident Analysis and Reporting

If an employee experiences a vehicular accident while driving a Company car or a personal car on Company business will and will do the following:

- Stop the vehicle. If it can be done safely, move the vehicle off the road.
- Immediately notify their supervisor as soon as safely possible.
  - If emergency services are required, they will be contacted first then their supervisor.
- Call appropriate law enforcement authority if damage is done to another vehicle or property that does not belong to the Company for an emergency, call 911 to summon both police and emergency medical services.
- **NOTE**: All motor vehicle incidents while on Company business will be reported immediately to the involved Company employee's supervisor(s) and when applicable law enforcement as well as the Company's Insurance Company.
- Mark the scene as necessary for safety.
- Gather the names of other drivers and witnesses.
- Diagram the accident, noting vehicles involved, where vehicle occupants were seated at the time of the accident, the date, time and weather conditions.
- Exchange the following information with other drivers involved: license plate number, registration information and insurance information.
- Document the name and badge number of the responding law enforcement professional.
- Cooperate with law enforcement professionals and participate in the Company's accident investigation.

Do not assume, blame, or apologize. Only give statements about what happened to the police or an appropriate member of Company management.

Any accident will be investigated according to the Company's accident investigation policy (see chapter on "Accident Investigation" for more details). Use the Motor Vehicle Accident Report at the end of this chapter to accompany the Company's Accident/Incident Report.

This Company will comply with all recordkeeping requirements of our safety policy and any applicable regulatory authority. Specifically, all records will be retained in the driver's qualification file during employment and at least three (3) years after.

Disciplinary Actions

Safety incidents involving an employee and a violation of our safety policy in a Company vehicle (or personal vehicle used on Company business) may result in disciplinary actions up to termination, including the revocation of driving privileges as determined by management.

Reward Program

It is at the discretion of the safety coordinator and, if appropriate, the safety committee to devise and implement a safe driver reward program to encourage safe driving habits and reward safe driving behaviors.

Policy Review

All aspects of this policy and the Company's driver safety program are subject to annual review by the safety coordinator and the safety committee to ensure the effectiveness of the policy to guarantee a safe working environment for Company employees.

TRAINING

The Company will train every employee who will drive for work related reasons on driver safety at no cost to the employee during working hours. Training methods will include, but are not limited to, hands-on, practical exams.

The Company will use only training material that is appropriate in content and vocabulary to educational level, literacy and language of employees.

DRIVER TRAINING

The driver safety program focuses on training and prevention. All new drivers will complete an orientation to cover:

- Policies and procedures for drivers
- Governmental regulations
- Maintenance guidelines and inspection procedures
- Driver training that encourages safe, defensive road behavior

Training Components

The safety coordinator will ensure any employee at the Company who drives on work business is qualified and capable to drive. Drivers will complete training in the following minimum elements for driver safety:

- Defensive driving
- Proper attitude
- Safe distances
- Intersection driving
- Poor driving conditions
- Split-second decision-making
- Distracted driving
- Driving in Work Zones
- Good visual habits
- Safety restraints

Training Records

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of the employees attending the training

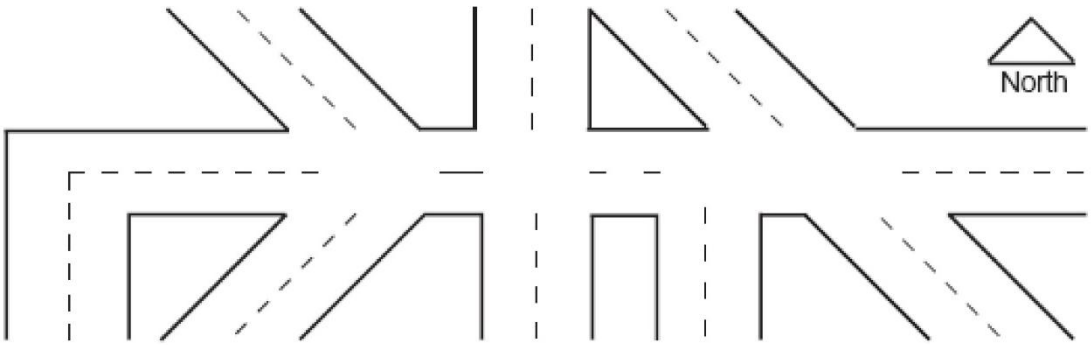
The Company will maintain employee training records for at least three (3) years from the date on which the training occurred.

FORMS AND ATTACHMENTS

On the following pages, please find the following document(s):

- Motor Vehicle Accident Report
- Driver Safety Training Documentation

Motor Vehicle Accident Report

<table>
<tr><th colspan="3">Driver's Information</th><th colspan="3">Other Party's Information</th></tr>
<tr><td colspan="3">Name:</td><td colspan="3">Driver's Name:</td></tr>
<tr><td colspan="3">Street:</td><td colspan="3">Street:</td></tr>
<tr><td>City:</td><td>State:</td><td>Zip:</td><td>City:</td><td>State:</td><td>Zip:</td></tr>
<tr><td>Phone:</td><td colspan="2">Driver License #:</td><td>Phone:</td><td colspan="2">Driver License #:</td></tr>
<tr><td>License Plate #:</td><td colspan="2">Vehicle Type:</td><td>License Plate #:</td><td colspan="2">Vehicle Type:</td></tr>
<tr><td colspan="3">Name of Insurance:</td><td colspan="3">Name of Insurance:</td></tr>
<tr><td>Policy Holder:</td><td colspan="2">Policy #:</td><td>Policy Holder:</td><td colspan="2">Policy #</td></tr>
<tr><td colspan="3">Passengers Information:</td><td colspan="3">Passengers' information:</td></tr>
<tr><td colspan="6">Accident Details</td></tr>
<tr><td>Date:</td><td>Time:</td><td>Appx. Speed:</td><td colspan="3" rowspan="3">Explain how the accident happened:</td></tr>
<tr><td colspan="3">Street:</td></tr>
<tr><td>City:</td><td>State:</td><td>Zip:</td></tr>
<tr><td colspan="3">Investigating Officer:</td><td colspan="3" rowspan="2">Describe your vehicle's damage:</td></tr>
<tr><td colspan="3">Police Department:</td></tr>
<tr><td>Phone:</td><td colspan="2">Badge #:</td><td colspan="3" rowspan="2">Describe another vehicle's damage:</td></tr>
<tr><td colspan="3">Investigating Officer:</td></tr>
<tr><td colspan="3">Police Department:</td><td colspan="3">Witnesses Information:</td></tr>
<tr><td>Phone:</td><td colspan="2">Badge #:</td><td colspan="3">Witnesses Information:</td></tr>
<tr><td colspan="6">SKETCH OF THE ACCIDENT SCENE (try to estimate the distances)
 
</td></tr>
</table>

Training Record

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

This space is intentionally left blank for printing purposes

POLICY

Mountain States Casing Company, LLC has implemented this policy to ensure no employee is exposed to electrical hazards in the workplace. “As Designated” is the supervisor responsible for ensuring the following policy for controls, training, personal protective equipment (PPE), and safe work practices is enforced.

RESPONSIBILITIES

Electrical safety is a responsibility shared between the Company and its employees.

Employer Responsibilities

Mountain States Casing Company, LLC is responsible for:

- Ensuring that only qualified employees perform electrical work on de-energized equipment that has been locked-tagged out
- Training employees in how to perform a job hazard analysis
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Safety Committee Responsibilities

It is the responsibility of the safety committee to:

- Assist in ensuring lockouttagout is followed when necessary
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

All employees are expected to:

- Perform electrical work on de-energized equipment that has been locked-tagged out only if qualified
- Qualified employees are responsible for maintaining qualifications
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

“As Designated” will ensure all employees exposed to work involving electrical systems or energized parts will be trained in and familiar with the safety-related work practices required by OSHA regulation and the National Fire Protection Association (NFPA) 70E that pertain to their respective job assignments.

“As Designated” will ensure that all employees exposed to work involving electrical systems will be trained in, and familiar with, the following:

- The requirements of NFPA 70E Standards for Electrical Safety in the Workplace.
- The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment.
- The skills and techniques necessary to determine the nominal voltage of exposed live parts.
- The clearance distances specified in §1910.333(c) and the corresponding voltages to which the qualified employee will be exposed.

The training required will be of the classroom or on-the-job type. The degree of training provided will be determined by the risk to the employee based upon the NFPA 70E - Standards for Electrical Safety in the Workplace.

- The training requirements apply to employees who face a risk of electric shock that is not reduced to a safe level by the electrical installation requirements.
- Other employees who also may reasonably be expected to face comparable risk of injury due to electric shock or other electrical hazards will also be trained.
- Employees will be trained in and familiar with the safety-related work practices required that pertain to their respective job assignments.
- Employees who are not qualified employees will also be trained in and familiar with any electrically related safety practices not specifically addressed by regulations, but which are necessary for their safety.

Qualified employees (i.e., those permitted to work on or near exposed energized parts) will, at a minimum, be trained in and familiar with the following:

- The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment.
- The skills and techniques necessary to determine the nominal voltage of exposed live parts.
- The specified clearance distances and the corresponding voltages to which the qualified employee will be exposed.
- Qualified employees whose work on energized equipment involves either direct contact or contact by means of tools or materials will also have the required training.

SAFE PRACTICES

- Only qualified employees are authorized to perform work, service, or maintenance on energized electrical parts or systems at Mountain States Casing Company, LLC
- Non-qualified employees are prohibited by Company Policy from working on or near exposed energized electrical circuits or systems. If a work task requires unqualified employees, any exposed electrical systems will be de-energized, and lockouttagout procedures adhered to per Company Policy before unqualified employees are allowed access to the work areas. Non-qualified employees will be trained in the recognition and avoidance of electrical hazards in the work area.
- Safe work practices will be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits that are or may be energized. The specific safe work practices will be consistent with the nature and extent of the associated electrical hazards.
- Live parts to which an employee may be exposed will be de-energized before the employee works on or near them, unless “As Designated” can demonstrate that de-energizing introduces additional or increased hazards or is infeasible due to equipment design or operational limitations. Live parts that operate at less than 50 volts to ground need not be de-energized if there will be no increased exposure to electrical burns or to explosion due to electric arcs.
- Live parts of electrical equipment operating at 50 volts or more will be guarded against accidental contact by cabinets or other forms of enclosures that only qualified employees will be able to access. Other examples might include:
  - Enclosing in a room or vault.
  - Screens or partitions.
  - Elevations of at least eight (8) ft.
- Entrances to rooms and other guarded locations containing live parts will be marked with conspicuous warning signs forbidding unqualified employees to enter.
- If the exposed live parts are not de-energized for reasons of increased or additional hazards or infeasibility, other safe work practices will be used to protect employees who may be exposed to the electrical hazards involved. Such work practices will protect employees against contact with energized circuit parts directly with any part of their body or indirectly through some other conductive object. The work practices that are used will be suitable for the conditions under which the work is to be performed and for the voltage level of the exposed electric conductors or circuit parts.
- NFPA 70E and OSHA require employers to prove that working in a de-energized state creates more or worse hazards or is not practical because of equipment design or operational limitations. Examples include working on life-support systems; emergency alarm systems; ventilation equipment for hazardous locations; work on circuits that are part of a continuous process that cannot be completely shut down.
- All electrical conductors and equipment will be acceptable, certified, listed, labeled, or otherwise determined to be safe by a qualified testing laboratory.
- Electrical equipment will be free from recognized hazards that are likely to cause death or serious physical harm to employees.
- Electrical equipment will not be used unless the manufacturer’s name, trademark, or other descriptive marking is placed on the equipment providing voltage, current, wattage, or other ratings, as necessary. The marking will be of sufficient durability to withstand the environment involved.

- Sufficient access and working space will be provided and maintained about all electric equipment to permit ready and safe operation and maintenance of such equipment.
- When normally enclosed live parts are exposed for inspection or servicing, the working space, if in a passageway or general open space, will be guarded.
- Equipment intended to break current will have an interrupting rating at system voltage sufficient for the current that will be interrupted.
- By partitions or screens, only qualified employees will have access to the space within reach of the live parts. Any openings in such partitions or screens will be so sized and located that people are not likely to come into accidental contact with the live parts or to bring conducting objects into contact with them.
- The employer will establish and implement an assured equipment grounding conductor program on construction sites covering all cord sets, receptacles which are not a part of the building or structure, and equipment connected by cord and plug which are available for use or used by employees.
- Barriers or other means of guarding will be provided to ensure that workspace for electrical equipment will not be used as a passageway during periods when energized parts of electrical equipment are exposed.
- Worn or frayed electric cords or cables will not be used.
- Extension cords will not be fastened with staples, hung from nails, or suspended by wire.

Work Activities Specific for up to 600V

- The qualified person shall use appropriately rated voltage sensing device and other direct reading instruments only on low voltage (i.e. DMM is used =<600 V) circuits. When determining the appropriate voltage sensing device, the qualified person shall consider both the static voltage and the spike voltage that could be encountered while performing the task. The appropriately rated (i.e. IEC) device shall then be used to complete the activity. Do not use direct reading instruments when the voltage range is unknown.
- Qualified persons shall not attach clips or clamps to energized buses because of potential arc flash.
- Do not modify or defeat over-current protection of circuits and conductors, even temporarily, unless permitted by a specific and documented safety risk assessment (SRA).
- Do not replace fuses when either side is energized

De-Energized Electrical Equipment

- All de-energized exposed parts will be treated as live throughout the work process.
- Conductors and parts of electric equipment that have been de-energized but have not been locked out or tagged will be treated as energized parts.
- While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been de-energized, the circuits energizing the parts will be locked out or tagged or both.

LockoutTagout Procedures

“As Designated” will maintain a written copy of these procedures and will make them available for inspection by employees and by the Assistant Secretary of Labor and the authorized representatives.

De-energizing equipment:

- Safe procedures for de-energizing circuits and equipment will be determined before circuits or equipment are de-energized.

- The circuits and equipment to be worked on will be disconnected from all electric energy sources. Control circuit devices, such as push buttons, selector switches, and interlocks, may not be used as the sole means for de-energizing circuits or equipment. Interlocks for electric equipment may not be used as a substitute for lockout and tagging procedures.
- Stored electric energy which might endanger employees will be released. Capacitors will be discharged, and high capacitance elements will be short-circuited and grounded, if the stored electric energy might endanger employees.
- Stored non-electrical energy in devices that will reenergize electric circuit parts will be blocked or relieved to the extent that the circuit parts will not be accidentally energized by the device.

Application of locks and tags includes:

- A lock and a tag will be placed on each disconnecting means used to de-energize circuits and equipment on which work is to be performed. The lock will be attached so as to prevent employees from operating the disconnecting means unless they resort to undue force or the use of tools.
- Each tag will contain a statement prohibiting unauthorized operation of the disconnecting means and removal of the tag.
- If a lock cannot be applied, or if “As Designated” can demonstrate that tagging procedures will provide a level of safety equivalent to that obtained by the use of a lock, a tag may be used without a lock.
- A tag used without a lock will be supplemented by at least one additional safety measure that provides a level of safety equivalent to that obtained by use of a lock. Examples of additional safety measures include the removal of an isolating circuit element, blocking of a controlling switch, or opening of an extra disconnecting device.
- A lock may be placed without a tag only under the following conditions: only one circuit or piece of equipment is de-energized; the lockout period does not extend beyond the work shift; employees exposed to the hazards associated with reenergizing the circuit or equipment are familiar with this procedure.
- Verification of de-energized condition requirements will be met before any circuits or equipment can be considered and worked as de-energized.
- A qualified employee will operate the equipment operating controls or otherwise verify that the equipment cannot be restarted.
- A qualified employee will use test equipment to test the circuit elements and electrical parts of equipment that employees will be exposed to and will verify that the circuit elements and equipment parts are de-energized. The test will also determine if any energized condition exists as a result of inadvertently induced voltage or unrelated voltage backed even though specific parts of the circuit have been de-energized and presumed to be safe. If the circuit to be tested is over 600 volts, nominal, the test equipment will be checked for proper operation immediately after this test.
- Reenergizing equipment requirements will be met before circuits or equipment are reenergized, even temporarily.
- A qualified employee will conduct tests and visual inspections to verify that all tools, electrical jumpers, shorts, grounds, or other devices have been removed, so that the circuits and equipment can be safely energized.
- Employees exposed to the hazards associated with reenergizing the circuit or equipment will be warned to stay clear of circuits and equipment.
- Each lock and tag will be removed by the employee who applied it or under his or her direct supervision. However, if this employee is absent from the workplace, then the lock or tag may be removed by a qualified employee designated to perform this task provided that: “As

Designated" ensures that the employee who applied the lock or tag is not available at the workplace. "As Designated" will also ensure that the employee is aware that the lock or tag has been removed before he or she resumes work at that workplace.
- There will be a visual determination that all employees are clear of the circuits and equipment.

Energized Electrical Equipment

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized under the previously stated procedures. Such employees will be capable of working safely on energized circuits and will be familiar with the proper use of special precautionary techniques, PPE, insulating and shielding materials, and insulated tools.

- If work is to be performed under or near overhead lines, the lines will be de-energized and grounded, or other protective measures will be provided before work is started. If the lines are to be de-energized, arrangements will be made with the employee or organization that operates or controls the electric circuits involved to de-energize and ground them. If protective measures, such as guarding, isolating, or insulating, are provided, these precautions will prevent employees from contacting such lines directly with any part of their body or indirectly through conductive materials, tools, or equipment.
- Qualified employees installing insulating devices on overhead power transmission or distribution lines should refer to § 1910.269 for specific work practices, as this type of work is not covered by § 1910.332 through § 1910.335, and unqualified employees are prohibited from performing this type of work.
- When an unqualified employee is working in an elevated position near overhead lines, the location will be such that the employee and the longest conductive object he or she may contact cannot come closer to any unguarded, energized overhead line than the following distances:
  - For voltages to ground 50kV or below – ten (10) ft.
  - For voltages to ground over 50kV – ten (10) ft. plus four (4) inches for every 10kV over 50kV.
- When an unqualified employee is working on the ground in the vicinity of overhead lines, the employee may not bring any conductive object closer to unguarded, energized overhead lines than the distances given above. For voltages normally encountered with overhead power line, objects which do not have an insulating rating for the voltage involved are considered to be conductive.
- When a qualified employee is working in the vicinity of overhead lines, whether in an elevated position or on the ground, the employee may not approach or take any conductive object without an approved insulating handle closer to exposed energized parts than shown in Table S-5 unless:
  - The employee is insulated from the energized part (gloves, with sleeves, if necessary, rated for the voltage involved are considered to be insulation of the employee from the energized part on which work is performed).
  - The energized part is insulated both from all other conductive objects at a different potential and from the employee.
  - The employee is insulated from all conductive objects at a potential different from that of the energized part.

Table S-5 - Approach Distances for Qualified Employees - Alternating Currents

Voltage range (phase to phase)	Minimum approach distance
300V and less	Avoid contact
Over 300V, not over 750V	1 ft. 0 inches
Over 750V, not over 2kV	1 ft. 6 inches
Over 2kV, not over 15kV	2 ft. 0 inches
Over 15kV, not over 37kV	3 ft. 0 inches
Over 37kV, not over 87.5kV	3 ft. 6 inches
Over 87.5kV, not over 121kV	4 ft. 0 inches
Over 121kV, not over 140kV	4 ft. 6 inches

- Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines will be operated so that a clearance of ten (10) ft. is maintained. If the voltage is higher than 50kV, the clearance will be increased four (4) inches for every 10kV over that voltage. However, under any of the following conditions, the clearance may be reduced.
- If the vehicle is in transit with its structure lowered, the clearance may be reduced to four (4) ft. If the voltage is higher than 50kV, the clearance will be increased four (4) inches for every ten (10) kV over that voltage.
- If insulating barriers are installed to prevent contact with the lines, and if the barriers are rated for the voltage of the line being guarded and are not a part of or an attachment to the vehicle or its raised structure, the clearance may be reduced to a distance within the designed working dimensions of the insulating barrier.
- If the equipment is an aerial lift insulated for the voltage involved, and if the work is performed by a qualified employee, the clearance (between the uninsulated portion of the aerial lift and the power line) may be reduced to the distance given in Table S-5.
- Employees standing on the ground will not contact the vehicle or mechanical equipment or any of its attachments, unless:
  - The employee is using protective equipment rated for the voltage.
  - The equipment is located so that no uninsulated part of its structure (that portion of the structure that provides a conductive path to employees on the ground) can come closer to the line than permitted below.
- If any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines is intentionally grounded, employees working on the ground near the point of grounding may not stand at the grounding location whenever there is a possibility of overhead line contact.
- Additional precautions, such as the use of barricades or insulation, will be taken to protect employees from hazardous ground potentials, depending on earth resistivity and fault currents, which can develop within the first few ft. or more outward from the grounding point.

Illumination

- Employees may not enter spaces containing exposed energized parts, unless illumination is provided that enables the employees to perform the work safely.
- Where lack of illumination or an obstruction precludes observation of the work to be performed, employees may not perform tasks near exposed energized parts.
- Employees may not reach blindly into areas which may contain energized parts.

Confined Spaces

- When an employee works in a confined or enclosed space (such as a manhole or vault) that contains exposed energized parts, Mountain States Casing Company, LLC will provide

protective shields, protective barriers, or insulating materials as needed, and the employee will use them to avoid accidental contact with these parts.
- Doors, hinged panels, and the like will be secured to prevent their swinging into an employee and causing the employee to contact exposed energized parts.

PPE

- Face shields, aprons, and rubber gloves will be provided for employees handling acids or batteries.
- Facilities for quick drenching of the eyes and body will be provided within 25 ft. (7.62 m) of battery handling areas.
- In work areas where the exact location of underground electric powerlines is unknown, employees using jackhammers, bars, or other hand tools that may contact a line will be provided with insulated protective gloves.

Conductive Materials and Equipment

Conductive materials and equipment that are in contact with any part of an employee's body will be handled in a manner that prevents them from contacting exposed energized conductors or circuit parts.

- If an employee will handle long-dimensional conductive objects (such as ducts and pipes) in areas with exposed live parts, “As Designated” will institute work practices (such as the use of insulation, guarding, and material handling techniques) which will minimize the hazard.

Portable Ladders

Portable ladders will have non-conductive siderails if they are used where the employee or the ladder will contact exposed energized parts.

Conductive Apparel

Conductive articles of jewelry and clothing, such as watch bands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread, or metal headgear, may not be worn if they might contact exposed energized parts. However, such articles may be worn if they are rendered nonconductive by covering, wrapping, or other insulating means.

Housekeeping

- Where live parts present an electrical contact hazard, employees may not perform housekeeping duties at such close distances to the parts that there is a possibility of contact, unless adequate safeguards (such as insulating equipment or barriers) are provided.
- Electrically conductive cleaning materials (including conductive solids such as steel wool, metalized cloth, and silicon carbide, as well as conductive liquid solutions) may not be used in proximity to energized parts unless procedures are followed which will prevent electrical contact.
- Working spaces, walkways, and similar locations will be kept clear of cords so as not to create a hazard to employees.

Interlocks

Only a qualified employee following the requirements of this section may defeat an electrical safety interlock, and then only temporarily while he or she is working on the equipment. The interlock system will be returned to its operable condition when this work is completed.

Utilities Grounding and De-energization

Mountain States Casing Company, LLC has designated “As Designated” to communicate with the system operator to de-energize certain sections of line or equipment that will be worked on. When multiple employees are working on the same lines or equipment, each employee will coordinate their activities. Activities will include ensuring all means through which known sources of electricity may be supplied are open, that network protectors are maintained to immediately trip open if closed when a primary conductor is de-energized, and that all manual overrides are disabled.

All electric energy sources (e.g., switches, disconnectors, jumpers, and taps) that are supplied to lines and equipment will be de-energized.

All electric energy sources will be made inoperable unless the design does not permit, in which case tagging will be in place to indicate employees are working.

Temporary protective grounds will be placed in a manner that Mountain States Casing Company, LLC can demonstrate employees will not be exposed to hazardous differences in electric potential. Guidelines on how the employer can establish the equipotential zone can be found in CFR 1910.269 Appendix C.

The American Society for Testing and Materials Standard Specifications for Temporary Protective Grounds to Be Used on De-Energized Electric Power Lines and Equipment, ASTM F855-09, provides guidelines for protective grounding equipment. These include that grounding equipment will be capable of conducting the maximum fault current that will flow at the point of grounding until the fault can be cleared, as well as having an ampacity greater than or equal to No. 2 AWG copper. IEEE also provides guidelines for selecting and installing protective grounding equipment in 1048-2003.

Grounds are permitted to be removed temporarily during tests. If this happens, each employee will:

- Use insulated equipment
- Isolate themselves from any hazards
- Use any other means necessary to protect themselves in case the previously grounded linesand equipment become energized
-

ELECTRICAL EMERGENCY RESPONSE STRATEGIES

- Electrical emergencies pose significant risks in the workplace, including electric shock, arc flash, burns, and fire. A well-structured emergency response strategy is essential to protect workers and minimize damage. This section outlines key components of an effective electrical emergency response plan, aligned with OSHA standards.

Access to First Aid

- Immediate medical response is critical in electrical emergencies. OSHA requires employers to
- ensure that medical personnel are readily available for advice and consultation.
- Key practices include:
-
- **First Aid Training:** Employees, especially those working with or near electrical systems, should be trained in CPR and basic first aid. Training should include how to respond to electrical burns, cardiac arrest, and shock.
- **First Aid Kits:** Kits must be easily accessible, clearly marked, and regularly inspected. They should include burn dressings, sterile gauze, antiseptics, and automated external defibrillators (AEDs).

- **Emergency Contact Protocols:** A list of emergency contacts, including local emergency services and on-site medical personnel, should be posted in visible locations.

Access to Emergency Equipment

- Proper emergency equipment can prevent injuries and save lives during electrical incidents. OSHA
- mandates that employers provide and maintain appropriate protective equipment.
- **Personal Protective Equipment (PPE):** Workers must have access to insulated gloves, arc-rated clothing, face shields, and dielectric footwear. PPE should be inspected before each use.
- **Fire Extinguishers:** Class C fire extinguishers (for electrical fires) must be available in areas with electrical equipment. Employees should be trained in their use.
- **Emergency Shutoff Devices:** Clearly labeled and easily accessible shut-off switches or circuit breakers should be installed to quickly de-energize equipment in an emergency.

Emergency Action Plans (EAP)

- An Emergency Action Plan is a written document required by 29 CFR 1910.38 that outlines procedures for reporting emergencies, evacuating personnel, and accounting for all employees after an evacuation.
- **Evacuation Routes and Assembly Points:** Clearly marked evacuation routes and designated assembly areas must be established and communicated to all employees.
- **Roles and Responsibilities:** Assign emergency response roles, such as evacuation coordinators, first aid responders, and fire wardens.
- **Drills and Training:** Conduct regular emergency drills to ensure all employees understand procedures and can respond quickly and safely.

Hazard Identification and Risk Assessment

- Before an emergency occurs, employers must identify potential electrical hazards and assess the
- risks.
- **Job Hazard Analysis (JHA):** Conduct JHAs for tasks involving electrical systems to identify risks and determine appropriate controls.
- **Labeling and Signage:** Use standardized labels and warning signs to indicate high-voltage areas, arc flash boundaries, and PPE requirements.
- **LockoutTagout (LOTO):** Implement LOTO procedures to ensure equipment is de-energized and cannot be restarted during maintenance or emergencies. LOTO is considered a first line of defense, if not feasible only perform energized electrical work with an approved energized electrical work permit.

Communication and Coordination

- Effective communication is vital during an emergency.
- **Alarm Systems:** Install audible and visual alarms to alert workers of electrical hazards or the need to evacuate.
- **Two-Way Communication:** Equip emergency response teams with radios or other communication devices to coordinate actions during an incident.
- **Coordination with Local Authorities:** Establish relationships with local fire departments, emergency medical services, and utility companies to ensure a coordinated response.
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Post-Incident Response and Reporting

- After an electrical emergency, a structured response helps prevent recurrence and supports
- recovery.
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- **Incident Investigation:** Conduct a thorough investigation to determine the root cause and implement corrective actions.
- **Medical Follow-Up:** Ensure affected workers receive appropriate medical evaluation and treatment.
- **Documentation and Reporting**: Maintain records of the incident, response actions, and any injuries, as required by OSHA.

Continuous Improvement

- Emergency response strategies should be reviewed and updated regularly.
-
- **Audit and Review:** Periodically audit emergency procedures and equipment to ensure compliance and effectiveness.
- **Feedback Mechanisms:** Encourage employee feedback after drills or real incidents to identify areas for improvement.
- **Training Updates:** Refresh training programs to reflect changes in equipment, procedures, or regulations.

TRAINING RECORD

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

POLICY

Mountain States Casing Company, 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

“As Designated” is designated as the supervisor to manage the Fire Prevention Program. Mountain States Casing Company, LLC will have and maintain an employee alarm system. The employee alarm system will use a distinctive signal for each purpose. “As Designated” will ensure that all employees are informed and trained in the following minimum elements for Emergency Action Plans:

- “As Designated” 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, Mountain States Casing Company, 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

Mountain States Casing Company, LLCwill designate and train employees to assist in the safe and orderly evacuation of other employees.

“As Designated” 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.

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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 “As Designated” 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 servicesduring 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.

Mountain States Casing Company, 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.

Mountain States Casing Company, 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.

Mountain States Casing Company, 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.

Mountain States Casing Company, 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.

Mountain States Casing Company, 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

“As Designated” 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.

Mountain States Casing Company, 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

Mountain States Casing Company, LLC will assure that hydrostatic testing is performed by trained persons with suitable testing equipment and facilities.

Mountain States Casing Company, 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).

Mountain States Casing Company, 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. Mountain States Casing Company, 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.

Mountain States Casing Company, 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.

Training Record

Trainer:
Signature:
Date:
Content of Training:
Attendees

Print Name:	Signature:

POLICY

It is the policy of Mountain States Casing Company, LLC that training in first aid response is not a requirement for employment, but that local Emergency Medical Services are utilized for emergency medical care. “As Designated” is designated as the administrator of the Medical Services Program.

- Medical services for employee evaluations, employment requirements, and special conditions of work are provided to employees at no cost, as specified in OSHA requirements.
- A person(s) who has a valid certificate in first aid training, the American Red Cross, or equivalent will be available at work sites to render emergency first aid.
- Provisions will be made prior to commencement of a project for prompt medical attention in case of serious injury.
- First aid supplies will be easily accessible when required.
- Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service, will be provided.
- “As Designated” is the designated first aid provider and certified in cardiopulmonary resuscitation (CPR),and is responsible for rendering first aid in the event of an injury requiring immediate response when emergency medical services are not available and will also be responsible for first aid training of any required employee.
- Injured employees are to be transported to medical facilities by emergency medical services. If emergency medical service is not available in a timely manner, the injured employee will be transported to the nearest medical service in a company vehicle by the job foreman.
- In areas where 911 service is not available, employees will be notified of phone numbers to contact local emergency response medical services. “As Designated” will be responsible for posting of emergency phone numbers at all job sites. The phone numbers will be conspicuously posted in all work locations.
- “As Designated” is responsible for the accessibility of first aid kits and for checking the contents of all first aid kits before being sent out to each job and at least weekly on each job to ensure that the expended items are replaced.
- A valid certificate in first aid training will be obtained from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence.
- Medical and first aid facilities will be made available and in the absence of facilities, “As Designated” will ensure a person trained to render first aid will be available at the work site.
- Prior to employees sent to a work site, Mountain States Casing Company, LLC ensures that arrangements to transport an injured or ill employees from the work site to the nearest health care facility are in place.
- Mountain States Casing Company, LLC ensures that an ambulance service is readily available to the work site when travel conditions are normal.
- When an ambulance service is not readily available or if travel conditions are not normal, Mountain States Casing Company, LLC ensures that other transportation is available that:
  - is suitable, considering the distance to be travelled and the types of acute illnesses or injuries that may occur at the work site
  - protects occupants from the weather
  - has systems that allow the occupants to communicate with the health care facility to which the injured or ill worker is being taken
  - can accommodate a stretcher and an accompanying person if required

- First aid kits are readily available in all company vehicles and in the company office. First aid kits will consist of appropriate items and be stored in a weatherproof container, with individual sealed packages of each type of item, and will stock a minimum of the following items:

PPE for First Aid:	Antiseptics & Ointments:
Three (3) pairs of latex gloves	Alcohol
Surgical masks	Burn gel or cream
Clear eye protection or face shield	Alcohol swabs
Dust masks or another needed face protection	Peroxide
Mouth-to-mouth barrier	Antiseptic spray and ointment
Large, sterile gauze pads: six (*6) each: 2X2", 3X3" and 4X4"*	Pain relief tabs
Compress dressings *(4X8), three (3) each*	Six (6) burn treatment single-use packages: (*0.5 g each)*
Rolled gauze bandages: *2" and 3" wide, three (3) each*	Good quality eye-wash solution with eye cup
Large box assorted "Band-Aids"	One (1) eye covering bandages (for two eyes)
Two elastic wrap bandages (ace)	Self-activating cold packs(*4x5 inches)*
Cotton balls and Q-tips	Liquid antiseptic hand soap
Surgical or athletic tape: *1" & 2" wide, 2 rolls each*	Blunt-nose surgical scissors

- Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities will be provided within the work area for quick drenching or flushing of eyes or body.
- Eye wash bottles are available wherever eye wash stations are not available, for any employee required to work in an environment where exposure to eye hazards may exist. Wash facilities or drench barrels are available at each jobsite for employees.
- Procedure for flushing eyes: Eye membranes absorb chemicals quickly. This can lead to eye damage within minutes. Flood the eye with lukewarm (never hot) water poured from a large glass two (2) to three (3) inches from the eye. Continue for 15 minutes. Blink the eye as much as possible during the flooding. Do not force the eyelid open and do not allow the eyes to be rubbed. If lukewarm water is not available, rinse the eye quickly using a gentle stream from a hose for at least 15 minutes.
- Procedure for drenching skin: If poisons come in contact with the skin, they must be removed as quickly as possible. Remove contaminated clothing and flood the skin area with water for 10 minutes. Then gently wash the skin area with soap and water and rinse. Later, destroy contaminated clothing. For a chemical skin burn, rinse the area with lots of water, remove the clothes, and cover with a soft, clean cloth. Do not apply grease or ointments.
- Mountain States Casing Company, LLC ensures that medical personnel will be readily available for advice and consultation in the matters of occupational health.
- It is the policy of Mountain States Casing Company, LLC that all of the requirements of OSHA §1926.50 will be met.

TRAINING RECORD

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

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POLICY

Mountain States Casing Company, LLC has adopted this policy to inform employees of the General Waste Management Plan. This ensures the safety and health of the employees.

“As Designated” is responsible for ensuring that the following policy is enforced.

REFERENCES

- 29 Code of Federal Regulations:
  - §1910.120 –Hazardous waste operations and emergency response.
- 40 CFR Part 243

WASTE TYPES

- Listed Wastes: Wastes that EPA has determined are hazardous. The lists include the F-list (wastes from common manufacturing and industrial processes), K-list (wastes from specific industries) and P- and U-lists (wastes from commercial chemical products)
- Characteristic Wastes: Wastes that do not meet any of the listings above but that exhibit ignitability, corrosivity, reactivity, or toxicity
- Universal Wastes: Batteries, pesticides, mercury-containing equipment (e.g., thermostats) and lamps (e.g., fluorescent bulbs)
- Mixed Wastes: Waste that contains both radioactive and hazardous waste components
- Construction Wastes: Building materials such as bricks, concrete, wood, insulation, nails, electrical wiring and rebar, as well as waste originating from site preparation such as dredging materials, tree stumps and rubble. Construction waste may contain lead, asbestos, or other hazardous substances
- Medical and Infectious Wastes: Waste generated by health care activities includes a broad range of materials, from used needles and syringes to soil dressings, body parts, diagnostic samples, blood, chemicals, pharmaceuticals, medical devices and radioactive materials

PROCEDURES

Waste Estimation

Prior to the commencement of work, it is the policy of Mountain States Casing Company, LLC, to ensure that an estimation of the wastes, trash and scrap materials that will be generated is conducted. This will be performed so the need for containers, and waste removal, if necessary, can be determined.

Waste Disposal

Mountain States Casing Company, LLC will coordinate with the project or site owner to ensure the proper disposal of waste or scrap materials. Mountain States Casing Company, LLC will ensure that the owner is aware of whether wastes and scrap materials will be taken off-site or will be disposed of on the owner’s site.

Safety Hazards

Mountain States Casing Company, LLC will ensure safe practices related to the immediate storage and handling of waste, scrap, or left-over materials are carried out. Always be aware of what you are handling. The proper Personal Protective Equipment (PPE) will be used before handling.

Handling, Organization, & Storage

Mountain States Casing Company, LLC will ensure that waste materials will be properly stored and handled to minimize the potential for a spill or impact on the environment. During outdoor activities, receptacles will be covered to prevent the dispersion of waste materials and to control the potential for run-off.

It is the policy of Mountain States Casing Company, LLC that all types of waste or scrap materials generated will be stored properly and in an organized fashion.

Mountain States Casing Company, LLC ensures project-related wastes will be stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees. Proper waste receptacles will be provided for trash and materials that may be reused or recycled during a project.

Proper Methods of Disposal

Employees will be informed upon initial assignment of the proper methods of disposal, the worksite waste management procedures and changes to the waste management plan.

It is the policy of Mountain States Casing Company, LLC to ensure all employees are instructed in the proper method to dispose of waste.

Employees of Mountain States Casing Company, LLC will be instructed on the general disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees will be trained to ensure proper disposal.

Waste Segregation

Mountain States Casing Company, LLC is committed to encouraging employees to properly segregate waste or scrap materials to ensure the opportunity for reuse or recycling.

Waste Storage Inspections

Mountain States Casing Company, LLC will be committed to ensure that all waste storage areas are subject to regular inspections to maintain safety, environmental compliance, and operational efficiency. These inspections will be conducted in accordance with applicable OSHA and EPA regulations, including 29 CFR 1910.120 and 40 CFR Part 243.

Mountain States Casing Company, LLC will designate trained personnel to perform routine checks on all waste containers and storage areas. These inspections will verify that containers are properly labeled, compatible with the waste stored, and in good condition without signs of leakage, corrosion, or damage.

Inspections will also ensure that storage areas are organized, free from obstructions, and equipped with appropriate secondary containment where necessary. Outdoor storage will be covered to prevent exposure to weather and reduce the risk of runoff.

Any deficiencies identified during inspections will be documented and corrected promptly. Inspection records will be maintained and made available for review as required by regulatory authorities.

It is the policy of Mountain States Casing Company, LLC to ensure that waste storage inspections are not only a compliance measure but also a proactive step in protecting employees, the public, and the environment.

TRAINING RECORD

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

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POLICY

Mountain States Casing Company, LLC has implemented this policy to ensure no employee is exposed to hazards caused by improper or unsafe use of hand and portable powered tools. Mountain States Casing Company, LLC will provide instruction and training by a Competent Person for each employee using any such tool. The program will enable each employee to recognize hazards related to hand and portable powered tool use, and will train each employee in the procedures to be followed to minimize these hazards.

REFERENCES

- §1910.241—Hand and Portable Powered Tools and Other Hand-Held Equipment
- §1926.300—Tools - Hand and Power

RESPONSIBILITIES

Employer Responsibilities

Mountain States Casing Company, LLC is responsible for:

- Ensuring that hand tools and portable powered equipment outside of the facility are inspected on a regular basis
- Ensuring each employee has been trained or instructed by a Competent Person in the following areas, as applicable:
  - All hand and power tools and similar equipment, whether furnished by Mountain States Casing Company, LLC or the employee, will be maintained in a safe condition.
  - Tools will comply with any applicable the Occupational Safety and Health Administration (OSHA) requirements.
  - Defective tools will be identified as unsafe and will be tagged, or the controls will be locked to render it inoperable, or they will be physically removed from their place of operation.
  - When power-operated tools are designed to accommodate guards, they will be equipped with such guards when in use.
  - Guards will always be in place and be operable while the tool is in use. The removal of guards is forbidden. The guard may not be manipulated in such way that will compromise its integrity or the protection in which it is intended. Guarding will meet the requirements set forth in American National Standards Institute (ANSI), B15.1 – 1953 (R1958), Safety Code for Mechanical Power-Transmission Apparatus.
  - Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases will be provided with the appropriate and properly fitting personal protective equipment (PPE) necessary to protect them from the hazard.
  - Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment will be guarded if such parts are exposed to contact by employees or otherwise create a hazard.
  - One (1) or more methods of machine guarding will be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. The point of operation of machines whose operation exposes an employee to injury will be guarded.
  - All fuel-powered tools will be stopped while being refueled, serviced, or maintained. When fuel-powered tools are used in enclosed spaces, the applicable PPE requirements for hazardous atmospheres will apply. Responding quickly to eliminate workplace hazards;

ensuring all equipment is kept in good repair; ensuring employees follow safe job procedures; and reviewing job hazard analysis (JHA) whenever there is a significant change to any element of the job or there has been an injury or illness.

Safety Committee Responsibilities

It is the responsibility of the Safety Committee to:

- Assist in hand tool and portable powered equipment inspections
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

All employees are expected to:

- Inspect hand tool and portable powered equipment before use
- Remove defective hand tool and portable powered equipment
- Follow safe job procedures
- Report hazards to a supervisor immediately

SAFE PRACTICES

General Power Tool Use

- Do not allow employees to use power tools if they have not been properly instructed and approved in the processes of safe operation.
- Be familiar with your power tools. When using a new tool, or one that is foreign to you, take some time to “test-run” it and get a feel for its performance. Read and understand the operator’s manual and follow its instructions. Prior to its use, do a visual and operational inspection to ensure safe mechanical function.
- Eye protection is extremely important and will always be worn when using power tools. When operations present potential eye injuries, adequate and appropriate protection will be selected. Use a face shield, protective goggles, or approved safety glasses depending on the job performed.
- Hearing protection is required due to the extreme noise levels generated, especially during extended operating sessions.
- Depending on the material being cut, gloves can be helpful, and a respirator or dust mask may be required.
- Wear clothing appropriate for power tools use; avoid long, loose shirtsleeves, neckwear, or untied long hair.
- Check that the electrical circuit to be used is of the proper rating and that cords, plugs, and fittings are intact and secure. All power tools will be grounded unless they are double-insulated.
- Use only extension cords that are free of splices, taps, bare wires, or frayed and deteriorated insulation. Use three (3)-prong adapters.
- Ensure all power tools are equipped with proper shields and guards, as recommended by the manufacturer. The guards are designed and engineered for the operator’s safety.
- Operate only properly maintained equipment. Check that the spring-loaded on/off trigger switch functions properly.

- If any operational problems are noted, remove the power tools from service and get it repaired immediately.
- When repairing tools, changing blades, bits and/or cutters, always disconnect the power source.
- Remove chuck-keys or arbor wrenches before using the tool.
- When possible, always secure your work on a stable platform using clamps or vises.
- Unsafe practices and inadequate housekeeping create potentially dangerous work-zones; keep the work area free of trip hazards such as tangled power cords, cluttered material, scraps, bricks, or other obstacles and obstructions.
- Be aware of your surroundings and always on the lookout for hazards. Avoid using power tools in a wet environment.
- Always use the proper tool for the job. Store tools in a dry, secure location.

Powder-Actuated Tools

Mountain States Casing Company, LLC employees are required to follow these general requirements for safe powder-actuated tool use:

- Operators and assistants using tools will use eye, head, and face protection as required by working conditions.
- Inspect the tool before use to ensure that it is clean, that all moving parts are free, and that the barrel is free of debris or obstructions.
- The muzzle end of the tool will have a guard at least 3 1/2 inches in diameter to confine any flying fragments that might create a hazard.
- If a tool is defective, it will be taken out of use until it is properly repaired.
- Tools are to remain unloaded until they are to be used.
- Never point a tool, loaded, or unloaded, at anyone.
- In case of a misfire, the tool will be held in the operating position for at least 30 seconds, tried a second time, then wait another 30 seconds before unloading it in strict accordance with the manufacturer’s instructions. Never leave a tool unattended where it would be available to unauthorized personnel.
- Fasteners will not be driven into exceptionally hard materials such as cast iron, glazed tile, hardened steel, glass block, or rock.
- A backing will be used on soft materials to prevent the fastener from passing completely through and becoming a flying hazard.
- Fasteners will not be driven through an existing hole unless means of positive alignment is available.
- Fasteners may not be driven into a cracked or fractured area caused by a previous fastener.
- Tools will not be used in an explosive or flammable atmosphere.

Requirements for loads and fasteners:

- There will be a standard means of identifying the power level of loads being used in the powder-actuated tools.
- No load may be used more than design specifications for a low velocity tool.
- Fasteners used in tools will be only those designed to be used in such tools.

Circular Saws

Mountain States Casing Company, LLC employees are required to follow these safety guidelines when using a circular saw:

- Eye protection is extremely important and will always be worn when using circular protection. Protective goggles, a face shield, or approved safety glasses will be selected depending on the job to be performed.
- Hearing protection may be required due to the extreme noise levels generated, especially during extended use.
- A respirator or dust mask may be required, depending on the material being cut.
- Do not wear loose clothing, work aprons, long-sleeves, or gloves while operating a circular saw.
- Check that the electrical circuit to be used is of the proper rating and that cords, plugs, and fittings are intact and secure.
- Circular saws will be grounded unless they are double insulated.
- Use only extension cords that are free of splices, taps, bare wires, or frayed and deteriorated insulation. Do not use extensions over 100 ft. long due to the power drop. Operate only properly maintained equipment. Check that the spring-loaded on/off trigger switch functions properly. If any operational problems are noted, remove the circular saw from service and get it repaired immediately.
- Be aware of your surroundings and always on the lookout for hazards. Avoid using circular saws in a wet environment.
- Always cut material on an elevated work platform. Never attempt to cut any material lying on the ground or by simply holding the material in your opposite hand.
- Be aware of the position of the cord. Always clear the cord before making the cut.
- Inspect all material prior to cutting. Look for defects such as knots in the wood, nails, screws, or any obstruction that may impede the cut.
- Always inspect the saw prior to operation, ensuring the blade is tight, and guards are fully functional.
- Never pin back or otherwise disable the retractable guard.
- Unplug the saw when changing blades or adjusting for depth or angle.
- After tightening the blade or making other adjustments, be sure to remove wrench before operating the circular saw.
- Maintain the saw and use only sharp blades or non-defective abrasive wheels free of distortion, cracks, or heat damage. A ring test will be performed on blades prior to installation to determine soundness.
- Always store and discard saw blades in a safe, responsible manner.
- When the saw is not in use, unplug the saw and place the saw out of the way with the blade facing down.
- Always use the proper tool for the job. When not in use, store circular saws in a dry, secure location.

Miter Saws

Mountain States Casing Company, LLC employees are required to follow these safety guidelines when using a miter cut-off (chop) saw:

- Do not, under any circumstances, allow anyone to use a chop saw that has not been properly instructed and approved in the processes of its safe operation.
- Prior to its use, do a visual and operational inspection to ensure safe mechanical function of the saw:
    - Make certain all blade guards are in place and working smoothly. Removing or pinning back guards is not only extremely hazardous; it is considered a serious safety violation.
    - Check the blade to be sure that it is straight, and the arbor bolt is tight.

  - Ensure the “constant-pressure” trigger switch operates properly.
  - Check that the electrical cords, plugs, and fittings are intact and secure. Frayed cords are not permissible.
  - Be sure that arbor wrenches or keys were not inadvertently left behind on the machine during a blade change.
- When setting up the cutting station, it is important that the saw is positioned in a manner that the workpiece’s point of contact with the cutting edge can be easily viewed without straining or stooping.
- Make sure the work-zone is level and free of trip hazards such as tangled power cords, cluttered material piles, scraps, stones, bricks, or other obstacles and obstructions. Avoid unsafe distractions by setting up away from high-traffic areas.
- Ensure the saw’s table or platform being used is stable and does not wobble. Be sure that accessory benches (for cutting long stock) are steady and sturdy; get assistance when needed.
- During cuts, keep blade speeds at recommended levels; overpressure on cuts will create hazardous situations.
- Hearing protection is required due to the extreme sonic and acoustical levels generated, especially during extended cutting.
- Eye protection will always be worn when using a chop saw.
- Depending on the material being cut, a dust mask may be required.
- Wear clothing appropriate with chop saw use; avoid long, loose shirt sleeves, neckwear, or untied long hair.
- If any operational problems are noted, remove the saw from service and get it repaired immediately.
- Proper care and maintenance will always be given the saw. Damage usually occurs during careless transport, handling, and storage of the tool.
- Allow only qualified personnel to make repairs to the saw.

Drills

- Do not allow anyone to use an electric drill that has not been properly trained in the processes of safe portable drilling operations.
- Operate only properly maintained equipment. Before use, carefully inspect the machine for defects that will cause malfunctions. Ensure the power cord is secure and intact, trigger switch functions properly, and that fasteners and attachments are tight and fitted. Operate the tool using both hands and follow the manufacturer’s operating instructions.
- Eye protection will always be worn when doing overhead operations. When operations present potential eye injuries, appropriate protection will be selected. Depending on the task, use a face shield, protective goggles, or approved safety glasses.
- When using a new or unfamiliar tool, take time to “test-run” it.
- Wear clothing appropriate for drilling or boring; avoid long, loose shirtsleeves or work aprons, neckwear, or long untied hair.
- Ensure the electrical circuit is properly rated and that cords, plugs, and fittings are intact and secure.
- Use only extension cords that are free of splices, taps, bare wires, or frayed and deteriorated insulation. Use three (3)-prong adapters.
- Select the correct drill and bit for the job and mount it securely in the chuck. Avoid using bits that are dull or bent.
- When possible, always secure your work on a stable platform using clamps or vises. The workpiece will be secured so it does not move.

- Prior to beginning drilling operations, inspect each work piece for nails, knots, or flaws that will cause the tool to buck or jump.
- Turn on the switch for a moment to see if the bit is properly centered and running true.
- With the switch off, place the point of the bit in the punched layout or pilot hole.
- Hold the drill firmly in one (1) or both hands and at the correct drilling angle.
- Turn on the switch and feed the drill into the workpiece. The pressure required will vary with the size of the drill, the diameter of the drill bit, and the kind of material being drilled.
- During operation, keep the drill aligned with the direction of the hole. Keep your free hand away from the point of operation.
- If any operational problems are noted, remove the drill from service and get it repaired immediately.
- Maintain work zones; keep the work area free of trip hazards such as tangled power cords, cluttered material, scraps, stones, bricks, or other obstacles. When repairing tools or changing bits, always disconnect the power source.
- Unsafe practices and inadequate housekeeping may create potentially dangerous obstructions.
- Be aware of your surroundings and always on the lookout for hazards. Avoid using electric drills in a wet environment.

Portable Abrasive Wheels

Mountain States Casing Company, LLC employees are required to follow these safety guidelines when using handheld grinders or other portable abrasive wheels:

- Employees using grinding tools and/or are exposed to the hazards of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, or vapors will be provide with, and compelled to use, the PPE necessary to protect them from the hazard. This equipment includes eye and face, respiratory, hearing, and hand protection and will be properly maintained to meet all applicable standards and regulations.
- All power grinding tools will be maintained in safe condition. When these tools are designed to accommodate guards, they will be in place when the tool is in use. Safety guards will be strong enough to retain flying fragments and withstand the effects of a bursting wheel.
- All grinding machines will be supplied with sufficient power to maintain safe spindle speeds under normal operating conditions.
- All abrasive wheels will be carefully inspected and “ring-tested” before mounting to ensure that they are free from cracks or defects. To perform a sound or ring test, wheels will be tapped gently with a light, non-metallic instrument. If they sound cracked or dead, they will fly apart during operations and will be discarded. An intact, undamaged wheel will give a clear metallic tone or “ring.”
- Only portable grinders with wheels two (2) inches in diameter or less may be equipped with a positive on/off control switch. Portable grinders with wheels larger than two (2) inches in diameter, including hand-held powered drills, tappers, fastener drivers, horizontal, vertical, and angle grinders, disc sanders, belt sanders, reciprocating saws, saber saws, and similar operating powered tools, will be equipped with a momentary contact "on-off" control. Additionally, they may have lock-on control, provided that the lock-off function can be achieved with a single motion of the same finger or fingers used to activate the tool. This safety requirement ensures the safe operation of these power tools and reduces the risk of unintended activation.
- Grinders will be used on a three (3)-wire grounded circuit or be of the approved double-insulated type. Using the tool’s power cord for hoisting or lowering will not be permitted.
- All grinding/cutting wheels will fit freely on the spindle and will not be forced on. The spindle nut will be tightened only enough to hold the wheel in place.

- When grinding metal, it is easy to leave razor-sharp edges; be sure you take them off before walking away from a work piece.

Pneumatic Nailers and Staplers

- Never allow anyone to operate these tools without proper instruction in its safe use.
- Appropriate PPE will be worn when using compressed air tools and equipment.
- Pneumatic-powered tools will be secured to the hose by some positive means to prevent the tool from becoming accidentally disconnected.
- All pneumatically powered nailers, staplers, or other similar equipment with automatic feed, that operate at over 100 psi at the tool will have a safety device on the muzzle to prevent the tool from cycling and ejecting fasteners unless the muzzle is in contact with the work surface.
- Do not use compressed air for cleaning purposes except when the pressure is reduced to less than 30 psi, provided that effective chip guarding and personal protective equipment are utilized. The 30 psi requirement does not apply in cases involving concrete form, mill scale, and similar cleaning purposes. The manufacturer's safe operating pressure for hoses, pipes, valves, filters, and other fittings will not be exceeded.
- Always avoid horseplay when using "air guns."
- Leave all safety features intact.
- Always wear appropriate eye protection when using any air gun.
- Hearing protection is often required depending on the noise level.
- Read the owner's manual and operate the tool according to the manufacturer's guidelines.
- Ensure that tools are properly maintained and are in good working condition.
- Never exceed the manufacturer's recommended working pressures, and never use more pressure than necessary (seldom more than 90 – 95 psi). Excessive pressure exerts more force, causing harder cycles. It is hard on tools and generates more flying debris.
- Always keep the nose of the tool pointed toward the workpiece or downward when air charged. Never point the tool towards yourself or others.
- During use, hold the nose of the gun firmly against the workpiece.
- Ensure all safety features are intact and operational.
- Always disconnect tool from air supply when clearing a jam or when not in use. Keep hoses and fittings in good condition.
- Never carry an air gun with your finger on the trigger to prevent accidental discharge and potential injuries. Tie-off and secure the air hose when working on a roof or scaffold to prevent the tool from falling on others.
- Always move forward when working with a nailer or stapler on a roof so you do not inadvertently trip or fall from the roof.
- Never use volatile bottled gas to operate pneumatic fasteners or operate air guns around flammables; sparks may cause a fire.
- Keep your free hand clear of the air gun's nose during use.
- Safety clips or retainers will be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled.

Air Compressors

Mountain States Casing Company, LLC employees are required to follow these safety guidelines while operating air compressors:

- Every air receiver will be equipped with a pressure indicator gauge with one (1) or more spring-loaded safety valves.
- Pressure gauges will be located to be readily visible.

- The pressure relief safety valves may not exceed the rated working pressure of the air receiving tank.
- No valve of any type may be placed between the safety valve and the air receiver.
- Safety valves, pressure gauges, regulators, and other controlling devices will be designed and installed so that they cannot be easily rendered inoperative by any means, including weather elements.
- All safety valves will be tested at frequent intervals to determine proper operating condition.
- A drainpipe and valve will be installed at the lowest point of any air receiver to provide for the frequent and complete removal of accumulated oil and water.
- Never install compressors on an unrated air receiver tank. The air receiver tank will be rated equal to or higher than the original equipment.
- If pressure gauges or pressure relief valves are damaged, replace them with compatible equipment before using the compressor.
- If a compressed air storage tank is dented, deeply gouged, or badly rusted, the compressor must be removed from service.
- Do not use compressed air to pressurize barrels, pipes, or other containers not designed or intended as pressure vessels.
- If an air receiver is equipped with a quick connect/release fitting, make sure the lock collar is fully engaged when the hose is connected. When the hose is released from the fitting, firmly grasp the hose close to the fitting before releasing the lock collar.
- Before servicing a compressor, disconnect it from the power source and bleed the pressure from the tank. Use appropriate lockout/tagout (LOTO) procedures.
- Pulleys and belts on compressor motors and pumps will be properly guarded.
- If using a gas-powered compressor, the engine will be shut off before refueling.
- If an electric-powered compressor, check the power cord for cuts and abrasions. If the cord, plug, or any components are damaged, replace before use.

Hand Tools

- Damaged, worn-out, or defective tools will be tagged and removed from service.
- Do not perform "make-shift" repairs to tools.
- Never use a tool if its handle has splinters, burrs, cracks, splits, or if the head of the tool is loose.
- Do not use impact tools such as hammers, chisels, punches, or steel stakes that have mushroomed heads.
- When handing a tool to another person, direct sharp points and cutting edges down and away from yourself and the other person.
- Carry all sharp tools in a sheath or holster. Do not carry sharp or pointed hand tools such as screwdrivers, utility knives, scribes, snips, scrapers, chisels, or files in your pocket unless the tool is sheathed. Transport hand tools only in toolboxes or tool belts.
- Use tied-off containers to keep tools from falling off scaffolds and other elevated work platforms.
- Avoid carrying tools in your hand when you are climbing. Carry tools in tool belts or hoist the tools to the work area using a hand line.
- Do not throw tools from one location to another or from one employee to another.

Hammers:

- Never strike another hardened steel tool or surface, such as a cold chisel, with a claw hammer.

- Avoid striking nails or other objects with the "cheek" of the hammer.
- Do not strike one hammer against another hammer.
- Never use a hammer as a wedge or a pry bar.
- Do not use a hammer if your hands are oily, greasy, or wet.

- Hand Saws:
- Do not use an adjustable blade saw, such as a hacksaw or a coping saw, if the blade is not taut.
- When using a handsaw, hold the workpiece firmly against the worktable.
- Avoid using any saw with a dull blade; always keep blades clean and sharp.
- Keep hands and fingers away from the point of cut when using any saw.
- Never carry a hand saw by the blade.

Screwdrivers:

- Do not use a screwdriver if your hands are wet, oily, or greasy.
- Always match the size and type of screwdriver blade to fit the head of the screw.
- Never hold the workpiece against your body while using a screwdriver.
- Avoid putting your fingers near the blade of the screwdriver when tightening a screw.
- Use a drill, nail, or an awl to make a starting or pilot hole for screws.
- Do not force a screwdriver by using a hammer or pliers on it.
- Never use a screwdriver as a punch, chisel, pry bar, or nail puller.
- When performing electrical work, ensure the screwdriver has a properly insulated handle.

Pliers:

- Do not use pliers that are cracked, broken, or sprung.
- Never use pliers as a wrench or a hammer.
- Do not attempt to force pliers by using a hammer on them.
- When you are performing electrical work, use pliers that have properly insulated handles.
- When using diagonal cutting pliers, shield the loose pieces of cut material from flying into the air.

Wrenches

Mountain States Casing Company, LLC employees are required to follow these safety guidelines when using wrenches:

- Inspect the wrench carefully before use and do not use if damaged.
- Discard any wrench that has spread, nicked, or battered jaws, or if the handle is loose, broken or bent.
- Always use the proper size wrench for the job. A slipping wrench can damage bolt heads and nuts and cause personal injury. Do not use a shim to make a wrench fit the fastener.
- Use a wrench that gives a straight, clean pull. If you will push the wrench, use the heel of your hand; do not wrap your fingers around the tool.
- Do not cock the wrench in a manner that puts a strain on the points of contact; this can lead to tool failure. Keep the wrench flush with bolt head.
- Avoid using a pipe or other “cheater bars” to extend the length of a wrench. Under excessive force, the wrench or bolt can slip or break.
- Do not use a hammer with a wrench unless the wrench has been specifically designed for this purpose.
- Replace cracked, worn, or “tweaked” wrenches.

- Do not attempt to straighten a bent wrench. It will only weaken it further.
- Do not substitute slip-joint pliers for a wrench; the pliers can slip and damage the bolt heads and nuts and cause hand injuries.
- Sockets designed for use with hand wrenches will not be interchanged on air or impact wrenches; this can result in damage or injury.
- When using air impact or other air wrenches, use only heavy-duty hardened sockets. Wear eye protection to safeguard against blowing debris.
- Use a torque wrench for tightening only. Never use torque wrenches to break nuts or bolts loose; they are designed to measure tightness.
- Be sure the jaws on your pipe wrenches are still sharp, as unexpected slippage can cause injury.

Jacks - Lever and Ratchet, Screw, and Hydraulic

Mountain States Casing Company, LLC employees are required to follow these safety guidelines when using jacks:

- The manufacturer's rated capacity will be legibly marked on all jacks and will not be exceeded.
- All jacks will have a positive stop to prevent overtravel.
- When it is necessary to provide a firm foundation, the base of the jack will be blocked or cribbed. Where there is a possibility of slippage of the metal cap of the jack, a wood block will be placed between the cap and the load.
- After the load has been raised, it will be cribbed, blocked, or otherwise secured at once.
- Hydraulic jacks exposed to freezing temperatures will be supplied with an adequate antifreeze liquid.
- All jacks will be properly lubricated at regular intervals.
- Each jack will be thoroughly inspected at times that depend upon the service conditions. Inspections will be not less frequent than the following:
  - For constant or intermittent use at one (1) locality, once every six (6) months.
  - For jacks sent out of shop for special work, when sent out and when returned.
  - For a jack subjected to abnormal load or shock, immediately before and immediately afterward.
  - Repair or replacement parts will be examined for possible defects.
  - Jacks which are “out of service” will be tagged accordingly and will not be used until repairs are made.

TRAINING RECORD

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

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POLICY

Mountain States Casing Company, LLC has implemented this program to ensure employees are informed of any chemical hazards and hazardous or toxic substances in their workplace.

Mountain States Casing Company, LLC will develop, implement and maintain at each workplace a written Hazard Communication Program that describes how labels and other forms of warning, safety data sheet (SDS), and employee information will be accomplished.

A copy of the Company's Hazard Communication Program is available to all employees and will be kept at each jobsite by the foreman in charge, or the office. Translations of the Hazard Communication Program are available to non-English-speaking employees upon request from "As Designated".

Employees will be notified of any hazardous substances used by any company other than Mountain States Casing Company, LLC in the workplace and make SDS available to employees.

A list of all chemicals known to be used at the workplace by company employees will be available for review at the jobsite and in the office. SDS for all chemicals used in the workplace by Mountain States Casing Company, LLC are available to employees at the worksite from the job foreman or in the office.

Changes in job assignments, changes in materials used, or any non-routine tasks involving hazardous substances or conditions will require notification and/or retraining of affected employees. "As Designated" will inform or retrain employees of any new or additional hazards, detail methods of hazard abatement or elimination, and provide proper personal protective equipment or engineering controls necessary for the job. Notifications and retraining will be documented as to the name of the employee, date, description of the action taken and verification by "As Designated".

DEFINITIONS

Combustible dust means finely divided solid particulates of a substance or mixture that pose a flash-fire hazard or explosion hazard when dispersed in air or other oxidizing media.

Exposure or exposed means that an employee is subjected in the course of employment to a hazardous chemical and includes potential (e.g., accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g., inhalation, ingestion, skin contact, or absorption.)

Gas means a substance which: at 122ºF (50°C) has a vapor pressure greater than 43.51 PSI (300 kPa) (absolute); or is completely gaseous at 68ºF (20°C) at a standard pressure of 14.69 PSI (101.3 kPa).

Hazardous chemical means any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, or a hazard not otherwise classified.

Immediate outer package means the first package enclosing the container of hazardous chemicals.

Liquid means a substance or mixture which at 122ºF (50°C) has a vapor pressure of not more than 43.51 PSI (300 kPa (3 bar)), which is not completely gaseous at 68ºF (20°C) and a standard pressure of 14.69 PSI (101.3 kPa), and which has a melting point or initial melting point of 68 ºF (20°C) or less at a standard pressure of 14.69 PSI (101.3 kPa).

Physical hazard means a chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, liquids, or solids); aerosols; oxidizer (gases, liquids, or solids); self-

reactive; pyrophoric (liquids or solids); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas; or desensitized explosive.

Solid means a substance or mixture which does not meet the definitions of liquid or gas.

CONTAINER LABELING

“As Designated” will ensure that each container of hazardous chemicals in the workplace is labeled, tagged, or marked with the following information:

- Identity of the hazardous chemical(s)
- Pictograms
- A signal word
- Hazard and precautionary statements
- The product identifier
- Supplier identification

“As Designated” will ensure labels or other, written warning forms, are legible and prominently displayed on the container, or readily available in the work area throughout each work shift. When Mountain States Casing Company, LLC has employees whose primary language is not English, information will be presented in their language as well.

No container will be released for use until this information is verified. *“As Designated”* will ensure that all containers are labeled with a copy of the original manufacturer’s label or a label that has the appropriate identification and hazard warning.

SDS

An SDS will be gathered and made available for every hazardous material at the worksite.

SDS are readily available for review to all Mountain States Casing Company, LLC employees and cover all hazardous chemicals used in the workplace. SDS are kept with the hazard communication plan at the office location listed above. The SDS are updated and managed by “As Designated”. If an SDS is not available for a hazardous chemical, before use, notify “As Designated”, and an SDS will be obtained for the chemical to be used.

Mountain States Casing Company, LLC will maintain in the workplace copies of the required SDS for each hazardous chemical and will ensure that they are readily accessible during each work shift to employees when they are in their work area(s). When employees will travel between workplaces during a work shift (i.e., when their work is carried out at more than one geographical location), the SDS may be kept at the primary workplace facility.

MULTI-EMPLOYER WORKPLACES

Mountain States Casing Company, LLC will use the following methods when working on multiemployer worksites or employees are on multiple worksites where hazardous chemicals are produced, used, or stored:

- On-site access to SDS for each hazardous chemical that other employer(s)’ employees may be exposed to.
- Inform other employer(s) of any precautionary measures that need to be taken to protect employees during the workplace’s normal operating conditions and in foreseeable emergencies
- Inform other employer(s) of the labeling systems used in the workplace

A copy of the written Hazard Communication Program is available to employees, their designated representatives, the Assistant Secretary, or the Director upon request, in accordance with the requirements of 29 CFR 1910.1020 (e).

Where employees will travel between workplaces during a work shift (i.e., their work is carried out at more than one geographical location), the written Hazard Communication Program may be kept at the primary workplace facility. If there is no primary site, the program will be sent with employees.

TRAINING

Required Hazard Communication Training

If you have employees who may be exposed to hazardous chemicals, you will inform them about the chemicals and train them when they are hired and whenever they are exposed to a new chemical hazard or a process change. Required employee training includes:

- An overview of the requirements in OSHA's CFR 29 1910.1200 Hazard Communication.
- The written hazard-communication plan, and where it may be reviewed.
- Hazardous chemicals are present in their workplace.
- The operations where hazardous chemicals are used.
- Physical and health effects of the hazardous chemicals.
- Methods used to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to these hazardous chemicals through the use of control/work practices and personal protective equipment (PPE).
- Where to find and how to read the hazard-communication plan, the list of hazardous chemicals, and SDS.
- The physical and health hazards of hazardous chemicals used by employees.
- The meaning of warning labels on hazardous chemical containers and on pipes that contain hazardous substances.
- Emergency procedures to follow if an employee is exposed to these chemicals.
- How to use PPE.

Label Elements Training

Mountain States Casing Company, LLC will ensure all employees know the following elements of the labels: product identifier, signal word, pictogram, hazard statement, precautionary statement, and name, address, and phone number of chemical manufacturers, distributor, or importer.

Employees will also be trained on how to use the labels, to ensure proper storage and quickly locate first-aid information.

They also need to know how the elements work together on a label.

- The different pictograms to indicate multiple hazards.
- Where there are similar precautions, the one with most protective information will be on the label.

SDS Training

Employees will be trained in the standardized 16-section format and the type of information found in each one.

Training will also explain how the SDS information is related to the label information.

After attending the training, each employee will sign a company training form verifying they understand the above topics and how the topics are related to the hazard communication plan.

General Safety Considerations

Employers who produce, use, or store hazardous chemicals at a workplace in such a way that the employees of other employer(s) may be exposed will additionally ensure that the hazard communication programs developed and implemented include the following:

- Methods the employer will use to provide the other employer(s) on-site access to SDS.
- Precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies.
- The labeling system used in the workplace.

The Company may not remove or deface existing labels on incoming containers of hazardous chemicals unless the container is immediately marked with the required information.

Hazardous Chemicals List

The following list identifies all hazardous chemicals used at this workplace. Detailed information about the physical and health effects of each chemical is included in a SDS. The identity of each chemical on the list matches the identity of the chemical on its SDS. SDS are readily available to employees in their work areas.

Product or Brand Name	Manufacturer	Hazardous Ingredient

Hazardous Non-Routine Tasks

Before employees perform non-routine tasks that may expose them to hazardous chemicals, they will be informed by their supervisors about the chemicals' hazards. Their supervisors will also inform them about the safe work practices necessary to control exposure and what to do in an emergency. Examples of non-routine tasks that may expose employees to hazardous chemicals include the following:

Task	Hazard

Hazardous Chemicals in Labeled or Unlabeled Pipes, Closed, or Hidden Systems

Before working in areas where hazardous chemicals are transferred through labeled or unlabeled pipes or where pipes are insulated with asbestos-containing material, employees will contact "As Designated" for the following information: the chemicals in the pipes, the physical or health effects of the chemicals or the asbestos insulation and the safe work practices to prevent exposure.

Notification of Contractors

It is the responsibility of the assigned job foreman to provide any workplace-associated contractors and their employees with the following information if they may be exposed to hazardous chemicals in our workplace:

- The identity of the chemicals, how to review SDS, and an explanation of the container and pipe labeling system.
- Safe work practices to prevent exposure.

This job foreman will also obtain an SDS for any hazardous chemical a contractor brings into the workplace to which an employee of Mountain States Casing Company, LLC may be exposed.

The Hazard Communication Program will be made available, upon request, to employees, their designated representatives, the Assistant Secretary, and the Director.

Hazard Communication in the Workplace

The essence of hazard communication is a warning. We use thousands of chemical products throughout our lives, at home, and at work. However, most of us would be hard-pressed to distinguish safe products from hazardous ones without a warning (the familiar skull-and-crossbones, for example). The warning tells us the product is hazardous, that it can harm us if we use it improperly.

In the workplace, hazard communication ensures workers who may be exposed to hazardous chemicals know about the chemicals' hazards and understand how to protect themselves from exposure.

The Hazard Communication Process

Hazard communication begins when chemical manufacturers and importers evaluate their products to determine each product's chemical hazards. Next, they prepare an SDS for each product. An SDS includes detailed information about the product's hazards. Manufacturers and importers will include an SDS and a warning label with each container of product they ship to a customer.

The part of the process that affects your workplace is the "*Written Hazard Communication Plan*." The plan identifies hazardous chemicals at your workplace and describes how you will use SDS, warning labels, and training to protect employees and keep informed about the product's chemical hazards.

The labeling system, location of SDS, routine precautions, and emergency procedures will be provided to other employers and employees affected by hazardous chemicals produced, used, or stored at the worksite.

Definition of a Hazardous Chemical

OSHA's hazard-communication rule, 1910.1200, defines a hazardous chemical as "any element, chemical compound, or mixture that is a physical hazard or a health hazard."

Chemicals that are Physical Hazards

Chemicals that are physical hazards are unstable and, when handled improperly, can cause fires or explosions. A chemical that is a physical hazard has one of the following characteristics:

- Is a combustible liquid
- Is a compressed gas
- Is explosive
- Is flammable
- Is water-reactive
- Starts or promotes combustion in other materials
- Can ignite spontaneously in air

Chemicals that are Health Hazards

Chemicals that are health hazards can damage an exposed person's tissue, vital organs, or internal systems. Generally, the higher the chemical's toxicity, the lower the amount or dose necessary for it to have harmful effects. The effects vary from person to person, ranging from temporary discomfort to permanent damage, depending on the dose, the toxicity, and the duration of exposure to the chemical.

Health effects range from short-duration symptoms that often appear immediately (acute effects) to persistent symptoms that may appear after longer exposures (chronic effects). Health effects can be classified by how they affect tissue, vital organs, or internal systems:

- Agents that damage the lungs, skin, eyes, or mucous membranes
- Carcinogens cause cancer
- Corrosives damage living tissue
- Hematopoietic agents affect the blood system
- Hepatotoxins cause liver damage
- Sensitizers cause allergic reactions & Irritants cause inflammation of living tissue
- Nephrotoxins damage cells or tissues of the kidneys
- Neurotoxins damage tissues of the nervous system
- Reproductive toxins damage reproductive systems, endocrine systems, or a developing fetus

How to Determine Whether a Chemical is Hazardous

A chemical is hazardous if it is listed in any of the following documents:

- OSHA Division 2, Subdivision Z safety and health rules, Toxic and Hazardous Substances; Division 3, Subdivision Z, Toxic and Hazardous Substances (Construction); Division 4, Subdivision Z, Chemical/Toxins (Agriculture).
- Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment (latest edition)., published by the American Conference of Industrial Hygienists (ACGIH).
- The Registry of Toxic Effects of Chemical Substances, published by the National Institute for Occupational Safety and Health (NIOSH).
- The container label of the product will issue a warning of hazardous effects.

Commonly Used Hazardous Chemicals

Listed below are chemicals among those most commonly used in U.S. workplaces:

Hazardous Chemical	Harmful Effects
1,1,1-Trichloroethane	May cause mutations in cells; can irritate the skin and eyes and cause unconsciousness and death. High exposures may damage the liver and kidneys.
Acetone	Can irritate the skin, eyes, nose, and throat. High concentrations can cause dizziness and loss of consciousness.
Aluminum oxide	Can irritate the eyes, nose, and throat. Repeated high exposure can cause scarring of the lungs and shortness of breath.
Ammonia	Can irritate the lungs and burn the eyes and skin. Long-term exposure can cause irritation of the eyes, nose, mouth, and throat.
Benzene	A cancer-causing agent that has been shown to cause leukemia. May also cause headaches and irritation of the eyes, nose, and throat. High exposure can cause convulsions and death.
Ethylbenzene	Can irritate the eyes, nose, and throat. Repeated contact can cause drying and scaling of skin and may cause liver damage. High concentrations may cause dizziness and loss of consciousness.
Ethylene glycol	Can irritate the eyes, nose, or throat and cause nausea, vomiting, and headaches. Repeated or high exposure levels can cause kidney damage or stones and brain damage. May cause birth defects.
Freon 113	May cause skin irritation and rashes as well as drowsiness.
Glycol ethers	Can irritate the eyes, nose, and throat and may cause birth defects. Repeated or high exposure can cause kidney damage or stones. Brain damage also may occur.
Hydrochloric acid	Can irritate the lungs. High exposure can cause buildup of fluid in the lungs, which can cause death.
Lead	Can cause weakness and insomnia. Higher exposure can result in damage to the nervous and reproductive systems.
Methanol	Irritates the eyes, nose, mouth, and throat and can cause liver damage.
Methyl ethyl ketone	Can cause dizziness, headaches, blurred vision, and loss of consciousness. May cause birth defects.
Methyl isobutyl ketone	Irritates the skin, eyes, nose, and throat, and may cause dizziness, nausea, diarrhea, and loss of consciousness. Long-term exposure may damage the liver and kidneys.
Phenol	Can irritate the mouth, nose, throat, and eyes. Long-term exposure may damage the liver and kidneys and lead to genetic damage. May be a cancer risk. Major skin contacts or inhaling it can cause death.
Sodium hydroxide	Breathing the dust or droplets can irritate and burn the lungs. Contact can cause severe skin burns.
Sulfuric acid	Can severely burn the skin and eyes. Repeated long-term exposure can cause bronchitis, shortness of breath, and emphysema.
Tetrachloroethylene	A suspected human carcinogen that has caused liver cancer in animals. It may damage the liver and kidneys after low but repeated exposure. It can cause dizziness and loss of consciousness.
Xylene	Can irritate the eyes, nose, and throat; high levels can cause loss of consciousness and death. It may damage fetuses. Repeated exposure may damage bone marrow and eyes and cause stomach problems.

Using Safety Data Sheets

An SDS contains detailed information about a hazardous chemical product's health effects, physical and chemical characteristics, and safe practices for using it.

Responsibilities of Chemical Manufacturers, Importers, and Distributors

Chemical manufacturers and importers will prepare an SDS for each hazardous chemical product they produce. Distributors are responsible for ensuring that you have a SDS for each hazardous chemical product they sell to you.

What to do if You Use Hazardous Chemical Products at your Workplace

You will have a current SDS for each product. Employees will be able to review the SDS in their work area at any time. You can keep SDS in a notebook or on a computer, though employees will be able to obtain the information immediately in an emergency. One person will be responsible for managing all the SDS at your workplace. The person will ensure the list of hazardous chemicals is current, that the identity of each chemical on the list matches its identity on its SDS, and that incoming hazardous chemical containers have SDS.

What to do When You No Longer Use a Hazardous Chemical at Your Workplace

When you no longer use a hazardous chemical, you do not need to keep its SDS. However, you do need to keep a record of the chemical's identity, the locations, and the calendar years it was used in your workplace, for at least 30 years. For more information about record-keeping requirements, see the "Access to employee exposure and medical records" section of 1910.1020.

Information required on Safety Data Sheets

Chemical manufacturers and importers will prepare an SDS for each hazardous chemical product they ship to you. The following information will appear on each sheet:

- Section 1, Identification: Includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
- Section 2, Hazard(s) identification: Includes all hazards regarding the chemical; required label elements.
- Section 3, Composition/information on ingredients: Includes information on chemical ingredients and trade secret claims.
- Section 4, First-aid measures: Includes important symptoms/effects, both acute and delayed; required treatment.
- Section 5, Fire-fighting measures: Lists suitable extinguishing techniques, equipment and chemical hazards from fire.
- Section 6, Accidental release measures: Lists emergency procedures; protective equipment and proper methods of containment and cleanup.
- Section 7, Handling and storage: Lists precautions for safe handling and storage, including incompatibilities.
- Section 8, Exposure controls/personal protection: Lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; PPE.
- Section 9, Physical and chemical properties: Lists the chemical's characteristics.
- Section 10, Stability and reactivity: Lists chemical stability and the possibility of hazardous reactions.
- Section 11, Toxicological information: Includes routes of exposure; related symptoms, both acute and chronic effects; numerical measures of toxicity.

- Section 12, Ecological information.
- Section 13, Disposal considerations.
- Section 14, Transport information.
- Section 15, Regulatory information.
- Section 16, Other information: includes the date of preparation or last revision.

OSHA does not require compliance with sections 12 through 15, as these areas are outside of OSHA's jurisdiction.

Using Container Warning Labels

The purpose of a container warning label is to warn employees about the container's contents and to refer employees to an appropriate SDS for more information about the chemical's physical and health hazards. Manufacturers, importers, and distributors will ensure that each hazardous chemical product sold to you has a label that includes the chemical's identity, a hazard warning, and a name and address for additional information about the product. If you use hazardous chemicals at your workplace, you will ensure that each hazardous chemical container has a legible label in English that identifies the chemical and warns of its hazards.

Containers that Will be Labeled

Original containers of hazardous chemicals from a manufacturer, importer, or distributor will have warning labels. Do not remove or deface them. If you transfer a hazardous chemical from a labeled container to an unlabeled container, label the container.

Contents of a Warning Label

A warning label will identify the chemical – a common chemical name or a code name is acceptable – and display a hazard warning such as 'DANGER' or the familiar skull-and-crossbones.

- The identity of the chemical on the label, on its SDS, and on your hazardous chemical sheet will match.
- If you are not sure a hazardous chemical container is properly labeled, contact the manufacturer or supplier.
- Make someone at your workplace responsible for ensuring all hazardous-chemical containers are properly labeled.

Mountain States Casing Company, LLC will ensure that workplace labels or other forms of warning are legible, in English, and prominently displayed on the container or readily available in the work area throughout each work shift. If Mountain States Casing Company, LLC has employees who speak other languages, the company may add the information in their language to the material presented, as long as the information is presented in English as well.

Example of Original Container GHS Label

SAMPLE LABEL

CODE _____
Product Name_____

Product Identifier

Company Name_____
Street Address_____
City_____ State____
Postal Code_____Country____
Emergency Phone Number_____

Supplier Identification

Hazard Pictograms

Signal Word
Danger

Keep container tightly closed. Store in a cool, well-ventilated place that is locked.
Keep away from heat/sparks/open flame. No smoking.
Only use non-sparking tools.
Use explosion-proof electrical equipment.
Take precautionary measures against static discharge.
Ground and bond container and receiving equipment.
Do not breathe vapors.
Wear protective gloves.
Do not eat, drink or smoke when using this product.
Wash hands thoroughly after handling.
Dispose of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO_2) fire extinguisher to extinguish.

First Aid
If exposed call Poison Center.
If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.

Precautionary Statements

Highly flammable liquid and vapor.
May cause liver and kidney damage.

Hazard Statements

Supplemental Information

Directions for Use

_____
_____
_____

Fill weight:_____ Lot Number:_____
Gross weight:_____ Fill Date:_____
Expiration Date:_____

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Secondary/Portable Containers

Secondary containers are used to hold material transferred from the manufacturer's original container. These are required to be labeled if:

- It is not used within the work shift by the individual who makes the transfer.
- The worker who made the transfer leaves the work area.
- The container has been moved to another work area and is no longer in the possession of the person who filled the container.

Labels for secondary containers will include:

- The identity of the chemical and appropriate hazard warnings will be shown on the label.
- The hazard warning that provides users with an immediate understanding of the primary health and/or physical hazard(s) of the chemical through the use of words, pictures, symbols, or any combination of these elements.
- The name and address of the manufacturer, importer, or other responsible party.

The hazard label message will be legible, permanently displayed, and written in English

Portable containers are intended for immediate use of a chemical by the person who makes the transfer. Labels on portable containers are not required if the worker who made the transfer uses all of the contents during the work shift, or the chemical is returned to a labeled primary or secondary container at the end of the shift, or when work is completed.

Confirmation of Employee's Hazard Communication Training

I, _____, have been informed about the hazardous chemicals that I may be exposed to during my work, and I have received training on the following topics:

- An overview of the requirements in OSHA's hazard communication rules.
- Hazardous chemicals present in the workplace.
- The written hazard-communication plan.
- Physical and health effects of the hazardous chemicals.
- Methods to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to these hazardous chemicals through use
- of exposure controls/work practices and personal protective equipment.
- Steps we have taken to reduce or prevent exposure to these chemicals.
- Emergency procedures to follow if exposed to these chemicals.
- How to read labels and review Safety Data Sheets.

Note to Employee: This form becomes part of your personnel file; read and understand it before signing.

By signing below, I attest and verify that I have received training in the above areas of hazard communication, and that I understand the content of that training.

_____ _____

Employee Date

_____ _____

Trainer Date

This space is intentionally left blank for printing purposes

POLICY

Mountain States Casing Company, LLC has implemented this policy to ensure no employee is exposed to hydrogen sulfide (H_2S) above the permissible exposure limit (PEL).

This policy is available to all employees who request it. “As Designated” is the assigned supervisor responsible for ensuring the following engineering controls and work practices are enforced:

“As Designated” will provide employees with information and training at the time of their initial assignment to a work area where H_2S is present. Training consists of a minimum of three and a half (3.5) hours of instructor-led classroom training (for all employees with the potential to be exposed above the OEL or the PEL) and will adhere to the ANSI/ASSE Z390.1-2017 Accepted Practices for Hydrogen Sulfide (H_2S) Training Programs. Training will address the characteristics and health effects of H_2S. If exposures are above the action level, employees will be provided with information and training at least annually thereafter. Necessary employee training will be documented to include: the identity of the employee trained; the signature and title of the employee trainer; and the date of the training. In addition, an annual refresher for all employees with the potential to be exposed above the OEL or the PEL is required and will also consist of a minimum of three and a half (3.5) hours of instructor-led classroom training.

Employees will be informed of all regulated areas and will be properly trained in entrance procedures, safety requirements and practices while in regulated areas.

REFERENCES

- 29 Code of Federal Regulations:
  - §1910.133—Eye and Face Protection
  - §1910.134---Respiratory Protection
  - §1910.146—Permit-required Confined Spaces

CHARACTERISTICS OF HYDROGEN SULFIDE

H_2S is produced as a result of the microbial breakdown of organic materials in the absence of oxygen. It is a colorless, extremely poisonous gas that has the characteristic odor of rotten eggs. The sense of smell becomes rapidly fatigued and cannot be relied upon to warn of the continuous presence of H_2S. Large amounts of H_2S are obtained in the removal of sulfur from petroleum and the gas is commonly found during the drilling and production of crude oil and natural gas, plus in wastewater treatment and utility facilities and sewers.

Hydrogen sulfide is:

- Extremely toxic and 100 ppm is the Immediately Dangerous to Life and Health (IDLH) concentration
- Colorless
- Solubility in water at 68°F is 0.4% by weight
- Flammable Gas
- Incompatible and reacts with strong oxidizers, strong nitric acid and metals
- UEL (upper explosive [flammable] limit in air) is 44.0% by volume (at room temperature)
- LEL (lower explosive [flammable] limit in air) is 4.0% by volume (at room temperature)
-

Additional Considerations:

- Contact and exposure occur through inhalation, skin and/or eye contact
- Target organs are the eyes, respiratory system and central nervous system
- Health effects and symptoms include irritation of the eyes and respiratory system; apnea, coma, convulsions; conjunctivitis, eye pain, lacrimation (discharge of tears), photophobia (abnormal visual intolerance to light), corneal vesiculation (blisters); dizziness, headache, lassitude (weakness, exhaustion), irritability, insomnia; gastrointestinal disturbance
- Affects the nerve centers of the brain which control breathing

Potential Employee Exposure to Hydrogen Sulfide includes:

- Drilling Operations
- Recycled Drilling Mud
- Water from sour crude wells
- Blowouts
- Tank Gauging (tanks at producing, pipeline and refining operations)
- Field Maintenance
- Tank batteries and wells, etc.

RESPIRATORY PROTECTION REQUIREMENTS

The Respiratory Protection Program, in compliance with OSHA §1910.134 and respiratory protective equipment is provided at no cost for all employees with potential for exposure to H_2S. Mountain States Casing Company, LLC will require employees with the potential to be exposed to hydrogen sulfide (H_2S) gas above the OEL or PEL to be trained in the elements of respiratory protection including medical evaluations, fit testing and selected respirator training.

The following National Institute of Occupational Safety and Health (NIOSH) respirator recommendations with their Assigned Protection Factor (APF) will be used under these hazardous conditions:

- H_2S Concentrations up to 100 ppm:
  - Any powered, air-purifying respirator with cartridge(s) providing protection against the compound of concern/ (APF = 50)
  - Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted canister protecting the compound of concern/ (APF = 10)
  - Any supplied air respirator/ (APF = 50)
  - Any self-contained breathing apparatus with a full facepiece
- Emergency or planned entry into unknown H_2S concentrations or IDLH conditions:
  - Any self-contained breathing apparatus that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode/ (APF = 10,000)
  - Any supplied air respirator that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained positive-pressure breathing apparatus
  - Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted canister protecting the compound of concern/Any appropriate escape-type, self-contained breathing apparatus/ (APF = 50)

Specific Requirements

- In the event of an emergency where H_2S is released at hazardous levels, employees not wearing sufficient personal protective equipment (PPE) for the situation will be immediately evacuated to a safe area until the hazard is contained.
- Adequate ventilation will be ensured in all enclosed work areas. Employees engaged in the maintenance of ventilation systems, including filter changes, are required to use proper PPE for the task.
- Regular monitoring of air quality in work areas will be provided to ensure that the PEL of H_2S is not being exceeded. Records of all monitoring tests will be made available at the Company office.
- Employees working at job sites where there is a potential for exposure to an H_2S hazardous atmosphere will be supplied with personal monitoring equipment which will be carried outside of clothing on the employee at all times when in the work area.
- The supplied monitors will be capable of sensing a minimum of 10 ppm of H_2S in the atmosphere; and will activate audible and visual alarms when the concentration of H_2S in the atmosphere reaches 10 ppm. When monitor alarms sound, employees will vacate the area and will not re-enter without proper respiratory protection.
- In the event that PEL of H_2S is exceeded within any facility where employees are contracted to work, all work will be stopped and employees evacuated until the facility's management can ensure that H_2S levels are brought down to an acceptable level for safe work.
- The management of any facility where Mountain States Casing Company, LLC contracts to work will provide a list of all operations in the facility where H_2S is emitted. Facility management will provide a copy of the facility's contingency plan provisions.
- Special precautions will be taken when employees are working inside tanks or vessels. Employees will adhere to the Mountain States Casing Company, LLC written Confined Space Program per §1910.146 and employees will be trained under §1910.146(g).
- The medical surveillance program for employees who potentially may be exposed to H_2S at or above the action level or PEL will be provided under the supervision of a licensed physician at no cost to the employee.
- Employees will wear proper PPE at all times while in work areas where H_2S is present. This PPE will include proper eye/face protection per §1910.133 where appropriate.
- All required signs and labels will be posted in areas of potential exposure to H_2S.
- All containers or materials containing H_2S will be appropriately labeled to indicate the contents and the hazards of the contents.
- SDS for H_2S and all hazardous materials at Mountain States Casing Company, LLC are available to employees at the Company office upon request.
- The occupational exposure limit (OEL) or the PEL that the Company limits employee exposure to H_2S is 10 ppm) as an eight (8)-hour time-weighted average (TWA). The OEL followed by ANSI, API and NIOSH is 10 ppm as an eight (8)-hour TWA, as stated as an eight (8)-hour TWA.

  NOTE*:* The OSHA PEL for Construction is 10 ppm as an eight (8) hour TWA and the OEL followed by ANSI, API and NIOSH is 10 ppm as an eight (8) hour TWA. OSHA General industry standards do not offer a PEL for industry; instead, an accepted ceiling concentration (ACC) of 20 ppm is used.

HAZARDS OF HYDROGEN SULFIDE

Hazards of Hydrogen Sulfide (H_2S)

Hydrogen Sulfide (H_2S) presents a potential hazard to employees at the worksite. It usually occurs as an unwanted by-product and can result in employee exposure in many different industries or occupations. To ensure protection against exposure to H_2S, both employees and employers will be aware of its properties, how it affects the body and what to do in emergency situations. Mountain States Casing Company, LLC will ensure that all employees who will be working at the jobsite will be properly trained in H_2S awareness and contingency procedures.

H_2S Characteristics

Hydrogen sulfide is a powerful and deadly gas that is colorless and smells like rotten eggs at low concentrations and has a sweet smell at high concentrations. However, employees will not rely on the smell as a warning as the gas quickly paralyzes the olfactory nerves which allow you to smell. The result will be instant death. Long exposure to low concentrations will also deaden the sense of smell.

H_2S is explosive - it will ignite and explode when subjected to a spark or ordinary flame - in any concentration from four (4) percent to 44% of the air. It is also soluble in water and oil, so it may flow for a considerable distance from its origin before escaping above ground or in an entirely unexpected place. Because the vapor (gas) is heavier than air, it may travel for a long way until ignited and then flash back towards the source. One of the products of burning H_2S is Sulfur Dioxide, also a toxic gas.

If the gas is burned, toxic products such as sulfur dioxide will be formed. Hydrogen sulfide is incompatible with oxidizing agents, such as nitric acid and chlorine trifluoride and may react violently or ignite spontaneously.

Sources of H_2S

H_2S is found widely in industry and few employees are warned of its dangers, or their exposure. It is formed by the decomposition of organic materials, so it is found in natural gas and oil, recycled drilling mud, water from sour crude wells, in mines, wells, fertilizers, sewers and cesspools. It is given off as a by-product in the manufacture of rayon, synthetic rubber, dyes and the tanning of leather.

Hydrogen sulfide is found in large amounts in natural gas and petroleum. Any employee involved in extracting gas and petroleum from the ground, or in storing, transporting, or processing gas is at risk from exposure to H_2S. Hydrogen sulfide exists in solution in crude oil and employees are exposed when the gas begins to "pass off" as it reaches the surface or comes into contact with air. This can occur at any point, including all stages of the refining operation and it is accelerated by heat or hot weather.

Fundamentally, employers and employees will be alert to the fact that working with a "closed system" does not always ensure safety. Operations involving the opening of valves or pumps on otherwise closed systems or working on such equipment that is not isolated or locked out are particular sources of danger. When a normally closed system is opened, the potential exists for releasing hazardous chemicals into the employees' breathing zones in unknown concentrations.

Health Effects on the Body

Hydrogen Sulfide is extremely toxic. When you breathe in H_2S, it goes directly through your lungs and into your bloodstream. To protect itself, your body "oxidizes" (breaks down) the H_2S as rapidly as possible into a harmless compound.

If you breathe in so much H_2S that your body cannot oxidize all of it, the H_2S builds up in the blood and you become poisoned. It may cause death instantaneously in high airborne concentrations. The nervous centers in your brain that control breathing may be paralyzed. Your lungs stop working and you are asphyxiated - just as though someone had come up and put their hands around your neck and strangled you.

A single breath of hydrogen sulfide at about 1000 ppm may paralyze the respiratory system and result in coma and death. An employee can be overcome by H_2S and lose consciousness in a few seconds; luckily if he is rescued in time and is given artificial respiration within a few minutes, the employee may recover. Either artificial mouth-to-mouth or an oxygen supply system of resuscitation will work if it is done in time, because, with an adequate source of oxygen and no further H_2S intake, the body will quickly break down the H_2S still in the blood.

Low levels may be extremely irritating to the lungs, nose, throat and eyes. Hydrogen Sulfide can be detected by smell at levels as low as 0.13 parts H_2S per million parts air (ppm). Odor cannot be used as a warning because the gas can deaden the sense of smell within two (2) to 15 minutes in exposures of approximately 100 ppm. Convulsions may also occur. Prolonged exposure at about 250 ppm H_2S may cause the lung tissue to swell and fill up with water (pulmonary edema). This effect may occur after the exposed employee recovers from the irritant effects of the gas. Exposures of 20 to 50 ppm hydrogen sulfide for one (1) hour may cause inflammation of the cornea and the delicate lining of the eye and eyelid (a condition called keratoconjunctivitis). Exposures for long periods at 50 ppm may cause severe irritation of the nose, throat and lungs. Employees exposed to lower concentrations of H_2S may develop headaches, eye disorders and chronic bronchitis.

Acute (Short-term) Effects

Gas is a silent threat – often invisible to the body’s senses. Inhalation is the primary route of exposure to hydrogen sulfide. Though it may be easily smelled by some people at small concentrations, continuous exposure to even low levels of H_2S quickly weakens the sense of smell (olfactory desensitization). Exposure to high levels of the gas can deaden the sense of smell instantly. Although the scent of H_2S is characteristic, the smell is not a dependable indicator of H_2S gas presence or for indicating increasing concentrations of the gas.

H_2S irritates the mucous membranes of the body and the respiratory tract, among other things. Following exposure, short-term, or acute, symptoms may include headache, nausea, convulsions and eye and skin irritation. Injury to the central nervous system can be immediate and serious after exposure. At high concentrations, only a few breaths are needed to induce unconsciousness, coma, respiratory paralysis, seizures and even death.

Chronic (Long-term) Effects

Hydrogen Sulfide can also cause a wide range of sub-acute and chronic effects. At low concentrations of 10-100 ppm), headache, dizziness, nausea and vomiting may develop, together with irritation of the eyes and respiratory tract (the lungs and trachea and bronchi, or air pipes from the nose and mouth to the lungs). The eyes become red, sore, inflamed and sensitive to light. Respiratory system effects include cough, pain in the nose and throat and pain on breathing.

If exposure at low levels continues, the employee may develop a state of chronic poisoning. In addition to eye and respiratory tract irritation, there will be a slowed pulse rate, fatigue, insomnia, digestive disturbances and cold sweats. More dangerous, if exposure at the level of 100 ppm (which results in eye and respiratory tract irritation and drowsiness after 15 minutes) lasts for several hours, it may result in death within the next 48 hours. Symptoms of chronic exposures at low levels are conjunctivitis (eye infections), headache, attacks of dizziness, diarrhea and loss of weight.

Chronic H_2S intoxication is marked by headaches, eye disorders, chronic bronchitis and a grey-green line on the gums. Reports of nervous system disorders including paralysis, meningitis and neurological problems have been reported, but not confirmed.

A study of employees and community residents of a California refinery engaged in extracting sulfur from crude oil, which is rich in H_2S, complained of headaches, nausea, vomiting, depression, personality changes, nosebleeds and breathing difficulties. When compared to a non-exposed group of people, the exposed people showed abnormalities of color discrimination, eye-hand coordination, balance and mood disturbances.

Hydrogen Sulfide can penetrate the skin and cause toxicosis in people exposed to large concentrations over long periods. The speed of onset of acute H_2S poisoning and the potency of H_2S are almost the same as for cyanide gas. In rats, exposure to H_2S has caused teratogenic (biological monstrosities and malformations) effects.

Those having prolonged exposure to high enough levels of H_2S gas to cause unconsciousness may continue to experience headaches, reduced attention span and motor functions. Pulmonary effects of H_2S gas exposure may not be apparent for up to 72 hours following removal from the affected environment. Delayed pulmonary edema, a buildup of excess fluid in the lungs, may also occur following exposure to high concentrations.

H_2S does not accumulate in the body, but repeated/prolonged exposure to moderate levels can cause low blood pressure, headache, loss of appetite and weight loss. Prolonged exposure to low levels may cause painful skin rashes and irritated eyes. Repeated exposure over time to high levels of H_2S may cause convulsions, coma, brain and heart damage and even death.

Symptoms of H_2S exposure

H_2S is classified as a chemical asphyxiant, similar to carbon monoxide and cyanide gases. It inhibits cellular respiration and uptake of oxygen, causing biochemical suffocation. Exposure levels to H_2S and symptoms of that exposure are divided into different toxicity levels, shown in the chart below.

10 ppm	Beginning eye irritation
50-100 ppm	Slight conjunctivitis and respiratory tract irritation after 1-hour exposure
100 ppm	Coughing, eye irritation, loss of sense of smell after 2-15 minutes. Altered respiration, pain in the eyes and drowsiness after 15-30 minutes followed by throat irritation after one (1) hour. Several hours of exposure results in the gradual increase in the severity of these symptoms and death may occur within the next 48 hours.
200-300 ppm	Marked conjunctivitis and respiratory tract irritation after one (1) hour of exposure
500-700 ppm	Loss of consciousness and possibly death in 30 minutes to one (1) hour.
700-1000 ppm	Rapid unconsciousness, cessation of respiration and death.
1000-2000 ppm	Unconsciousness at once, with early cessation of respiration and death in a few minutes. Death may occur even if the individual is removed to fresh air at once.

Use and operation of H_2S monitoring systems and detection methods used on-site

Employees working at job sites where there is a potential for exposure to hazardous atmospheres will be supplied with personal monitoring equipment that will be carried outside of clothing on the employee at all times when in the work area. The monitors supplied will be capable of sensing H_2S in the atmosphere and will activate audible and visual alarms when the concentration of H_2S in the atmosphere exceeds 10 ppm or 20 ppm.

The acceptable ceiling concentration for H_2S exposure is 10 ppm and 50 ppm is the acceptable maximum peak above the acceptable ceiling concentration for an eight (8) hour shift with a one-time 10-minute exposure only if no other measured exposure exists.

Alternatively, stationary monitors may be installed. Personal or stationary monitors will be capable of sounding an audible alarm or warning. “As Designated” will administer the monitor maintenance program for Mountain States Casing Company, LLC. Monitors will be calibrated and maintained per the manufacturer’s instructions.

Proper use and maintenance of PPE

See Mountain States Casing Company, LLC Policy on respiratory protection. Employees working in areas where the possibility of exposure to toxic gases exists will be provided NIOSH-approved full-face SCBA respiratory equipment and trained in their use and maintenance according to the Company Respiratory Protection Program which is administered by “As Designated”. Demonstrated proficiency in using PPE is required by the program.

Locations and use of safety equipment

Personal hazardous atmosphere detection monitors and respiratory protective equipment will be immediately available to each employee at all times in the work area. Safety equipment will be kept immediately available to all employees on the jobsite.

All employees of Mountain States Casing Company, LLC will be notified of the location of safety equipment on each jobsite before commencement of work. Only employee trained in the proper use of any required safety equipment will be allowed on the jobsite.

Recognition and response to H_2S warnings at the workplace

Mountain States Casing Company, LLC employees will be trained on site-specific emergency action plans to include evacuation procedures. Employees will be required to respond immediately to audio or visual warnings issued either by personal monitoring equipment or established workplace general warning signals. Workplace site-specific contingency plans of the plant owner will be reviewed with employee and provisions of the plan followed. When a warning signal is sounded, employees will immediately put on SCBA respiratory protection, vacate the area and do not re-enter. Employees will notify or contact necessary employee and are not permitted to return to the work area until clearance is given for re-entry. Evacuation plans will be established for each worksite before the commencement of work. “As Designated”, or the foreman in charge of the job site, will be responsible for supervision of evacuation procedures, checking for proper use of respiratory protection, ensuring all employees are cleared of the hazard area, notification of the facility management and assembly and headcount of evacuated employee at designated safe areas.

Proper rescue and first aid to be used in an H_2S exposure

First aid kit and oxygen will be kept in the supervisor’s work vehicle and available to all employees. A litter for transport of incapacitated employees will be provided by Mountain States Casing Company, LLC and kept on-site if one is not available from the facility.

In the event an employee is exposed to H_2S, the employee will immediately be evacuated to a safe briefing area, emergency medical services will be notified and oxygen will be administered, along with cardiopulmonary resuscitation (CPR) if required. Oxygen will be administered regardless of the condition of the victim to ensure a reduction of the absorption concentration of H_2S. If an employee is rendered unconscious due to H_2S exposure, assigned employee wearing proper SCBA will respond to perform rescue operations of the victim.

Locations of safe briefing areas

Safe briefing areas will be designated outside the work zone for each work location where the possibility of hazardous atmospheres exist. At least two (2) briefing areas will be designated for each worksite. Employees will be notified of these areas before the commencement of work. “As Designated” will be responsible for evaluation and designation of safe briefing areas for Mountain States Casing Company, LLC.

Wind direction awareness and routes of egress

Wind direction will be monitored by “As Designated” at the beginning of each shift to determine safe egress routes for employees in the event of an evacuation. Wind direction will be regularly checked and noted throughout the work shift for wind shift which will necessarily facilitate a change of egress routes for evacuation. Evacuation routes will be determined for each work area before commencement of work and routes will be clearly marked and posted in conspicuous areas in the workplace. In the event of an emergency evacuation, “As Designated” will be responsible for determination and notification of the proper egress route to be used for employee safety.

Confined space and enclosed facility entry procedures

Whenever employees enter a confined space, such as a tank, strict work practices will be followed, including the Company permit entry system.

“As Designated” will ensure that the Mountain States Casing Company, LLC Confined Space Entry program is adhered to, that the air is continually monitored for the presence of H_2S and that an

employee be stationed as a monitor outside of a confined space. Supplied air respirators, lifelines and rescue equipment will be immediately available.

See Mountain States Casing Company, LLC Policy on Permit Required Confined Spaces. These procedures will be enforced in all confined work situations.

GAS DETECTORS/MONITORS

Mountain States Casing Company, LLC will ensure each employee will use a portable gas detector as required in all areas where hydrogen sulfide may be present and the employees will be properly trained in the operation and maintenance of issued gas-detection equipment.

The gas monitor will be calibrated per the manufacturer's recommendations. Each monitor will contain a current calibration sticker on the monitor providing the date of calibration.

At the beginning of each day, a bump test is required to be completed on the monitor when in use per the requesting owner client and manufacturer's guidelines. This is to ensure the monitor and alarms are functioning correctly. Employees will be trained in how to bump-test issued gas-detection equipment as well as how to accurately calibrate issued gas-detection equipment. A full calibration is required if a monitor fails a bump test.

Bump Test: Briefly expose the portable detector to a known concentration of gas high enough to set off the alarm. Note the reading to ensure that it is correct. A bump test is not calibration, but a quick way to ensure that the most important functions of the instrument are intact.

Personal alarm monitors will be set to alarm initially at 10 ppm H_2S and each contractor will wear an H_2S personal alarm monitor when working in all potential H_2S areas.

Chemicals with Potential Spill or Release List

Product or Brand Name	Manufacturer	Hazardous Ingredient

TRAINING RECORD

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

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POLICY

Mountain States Casing Company, LLC has adopted this policy for Injury/Illness Recordkeeping in accordance with OSHA regulations

REFERENCES

- §1904 – Injury / Illness Recordkeeping

RECORDS

It is the policy of Mountain States Casing Company, LLC to retain records of work-related fatalities, injuries, and illnesses that is:

- Work-related
- New case
- Meets one of the general recording criteria of 29 CFR 1904.4(a)

It is the policy of Mountain States Casing Company, LLC to enter each recordable injury or illness on an OSHA 300 Log and 301 incident report, or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

At the end of each calendar year “As Designated” must examine the OSHA 300 Log and certify that, based on the knowledge of the process by which the information was recorded, that the annual summary is correct and complete. A designated company official must sign the OSHA 300A Summary and make it available for posting. (See §1904.32 (b)(3))

ANNUAL SUMMARY POSTING

Mountain States Casing Company, LLC will post a copy of the annual summary in each facility. The summary must be posted in a conspicuous place or places where notices to employees are customarily posted. Mountain States Casing Company, LLC will ensure that the posted annual summary is not altered, defaced, or covered by other material. The annual summary will be posted no later than February 1st of the year following the year covered by the records. The posting must be kept in place through April 30th.

Mountain States Casing Company, LLC will save the OSHA 300 Log, the privacy case list (if one exists), the annual summary, and the OSHA 301 Incident Report Forms for five (5) years following the end of the calendar year that these records cover.

The decision tree for recording work-related injuries and illnesses on the next page shows the steps involved in how to decide whether an injury or illness is recordable.

GENERAL RECORDING CRITERIA

Basic Requirement

You must consider an injury or illness to meet the general recording criteria, and therefore to be recordable, if it results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness. You must also consider a case to meet the general recording criteria if it involves a significant injury or illness diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

Implementation

How do I decide if a case meets one or more of the general recording criteria?

A work-related injury or illness must be recorded if it results in one or more of the following:

- Death. See §1904.7 (b)(2)
- Days away from work. See §1904.7 (b)(3)
- Restricted work or transfer to another job. See §1904.7 (b)(4)
- Medical treatment beyond first aid. See §1904.7 (b)(5)
- Loss of consciousness. See §1904.7 (b)(6)
- A significant injury or illness diagnosed by a physician or other licensed health care professional. See §1904.7 (b)(7)

How do I record a work-related injury or illness that results in the employee's death?

You must record an injury or illness that results in death by entering a check mark on the OSHA 300 Log in the space for cases resulting in death. You must also report any work-related fatality to OSHA within eight (8) hours, as required by §1904.39.

How do I record a work-related injury or illness that results in days away from work?

When an injury or illness involves one or more days away from work, you must record the injury or illness on the OSHA 300 Log with a check mark in the space for cases involving days away and an entry of the number of calendar days away from work in the number of days column. If the employee is out for an extended period of time, you must enter an estimate of the days that the employee will be away and update the day count when the actual number of days is known.

- Do I count the day on which the injury occurred, or the illness began? No, you begin counting days away on the day after the injury occurred or the illness began
- How do I record an injury or illness when a physician or other licensed health care professional recommends that the worker stay at home, but the employee comes to work anyway?

You must record these injuries and illnesses on the OSHA 300 Log using the check box for cases with days away from work and enter the number of calendar days away recommended by the physician or other licensed health care professional. If a physician or other licensed health care professional recommends days away, you will encourage your employee to follow that recommendation. However, the days away must be recorded whether the injured or ill employee follows the physician or licensed health care professional's recommendation or not. If you receive recommendations from two or more physicians or other licensed health care professionals, you may decide as to which recommendation is the most authoritative, and record the case based upon that recommendation.

How do I record a work-related injury or illness that results in restricted work or job transfer?

When an injury or illness involves restricted work or job transfer but does not involve death or days away from work, you must record the injury or illness on the OSHA 300 Log by placing a check mark in the space for job transfer or restriction and an entry of the number of restricted or transferred days in the restricted workdays column.

- How do I decide if the injury or illness resulted in restricted work? Restricted work occurs when, as the result of a work-related injury or illness:
  - You keep the employee from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work; or
  - A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work.
- What is meant by "routine functions"? For recordkeeping purposes, an employee's routine functions are those work activities the employee regularly performs at least once per week.
- Do I have to record restricted work or job transfer if it applies only to the day on which the injury occurred, or the illness began? No, you do not have to record restricted work or job transfers if you, or the physician or other licensed health care professional, impose the restriction or transfer only for the day on which the injury occurred, or the illness began.

If you, a physician, or other licensed health care professional recommends a work restriction, is the injury or illness automatically recordable as a "restricted work" case?

No, a recommended work restriction is recordable only if it affects one or more of the employee's routine job functions. To determine whether this is the case, you must evaluate the restriction in light of the routine functions of the injured or ill employee's job. If the restriction from you or the physician or other licensed health care professional keeps the employee from performing one or more of his or her routine job functions, or from working the full workday the injured or ill employee would otherwise have worked, the employee's work has been restricted and you must record the case.

How do I record a case where the worker works only for a partial work shift because of a work-related injury or illness?

A partial day of work is recorded as a day of job transfer or restriction for recordkeeping purposes, except for the day on which the injury occurred or the illness began.

If the injured or ill worker produces fewer goods or services than he or she would have produced prior to the injury or illness but otherwise performs all of the routine functions of his or her work, is the case considered a restricted work case?

No, the case is considered restricted work only if the worker does not perform all of the routine functions of his or her job or does not work the full shift that he or she would otherwise have worked.

How do I handle vague restrictions from a physician or other licensed health care professional, such as that the employee engages only in "light duty" or "take it easy for a week?”

If you are not clear about the physician or other licensed health care professional's recommendation, you may ask that person whether the employee can do all of his or her routine job functions and work all of his or her normally assigned work shift. If the answer to both of these questions is "Yes," then the case does not involve a work restriction and does not have to be recorded as such. If the answer to one or both of these questions is "No," the case involves restricted work and must be recorded as a restricted work case. If you are unable to obtain this additional information from the physician or other licensed health care professional who recommended the restriction, record the injury or illness as a case involving restricted work.

What do I do if a physician or other licensed health care professional recommends a job restriction meeting OSHA's definition, but the employee does all of his or her routine job functions anyway?

You must record the injury or illness on the OSHA 300 Log as a restricted work case. If a physician or other licensed health care professional recommends a job restriction, you will ensure that the employee complies with that restriction. If you receive recommendations from two or more physicians or other licensed health care professionals, you may decide as to which recommendation is the most authoritative, and record the case based upon that recommendation.

How do I decide if an injury or illness involved a transfer to another job?

If you assign an injured or ill employee to a job other than his or her regular job for part of the day, the case involves transfer to another job.

Note*:* This does not include the day on which the injury or illness occurred.

Are transfers to another job recorded in the same way as restricted work cases?

Yes, both job transfer and restricted work cases are recorded in the same box on the OSHA 300 Log. For example, if you assign, or a physician or other licensed health care professional recommends that you assign, an injured or ill worker to his or her routine job duties for part of the day and to another job for the rest of the day, the injury or illness involves a job transfer. You must record an injury or illness that involves a job transfer by placing a check in the box for job transfer.

How do I count days of job transfer or restriction?

You count days of job transfer or restriction in the same way you count days away from work. The only difference is that, if you permanently assign the injured or ill employee to a job that has been modified or permanently changed in a manner that eliminates the routine functions the employee was restricted from performing, you may stop the day count when the modification or change is made permanent. You must count at least one day of restricted work or job transfer for such cases.

How do I record an injury or illness that involves medical treatment beyond first aid?

If a work-related injury or illness results in medical treatment beyond first aid, you must record it on the OSHA 300 Log. If the injury or illness did not involve death, one or more days away from work, one or more days of restricted work, or one or more days of job transfer, you enter a check mark in the box for cases where the employee received medical treatment but remained at work and was not transferred or restricted.

What is the definition of medical treatment?

"Medical treatment" means the management and care of a patient to combat disease or disorder. For the purposes of Part 1904, medical treatment does not include:

Visits to a physician or other licensed health care professional solely for observation or counseling.

- The conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils); or
- "First aid" as defined below.

What is "first aid"?

For the purposes of Part 1904, "first aid" means the following:

- Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes)
- Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment)
- Cleaning, flushing or soaking wounds on the surface of the skin
- Using wound coverings such as bandages, Band-Aids, gauze pads, etc.; or using butterfly bandages or Steri-Strips (other wound closing devices such as sutures, staples, etc., are considered medical treatment)
- Using hot or cold therapy
- Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes)

- Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.)
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister
- Using eye patches
- Removing foreign bodies from the eye using only irrigation or a cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Using finger guards
- Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes).
- Drinking fluids for relief of heat stress

Are any other procedures included in first aid?

No, this is a complete list of all treatments considered first aid for Part 1904 purposes.

Does the professional status of the person providing the treatment have any effect on what is considered first aid or medical treatment?

No, OSHA considers the treatments listed above to be first aid regardless of the professional status of the person providing the treatment. Even when these treatments are provided by a physician or other licensed health care professional, they are considered first aid for the purposes of Part 1904. Similarly, OSHA considers treatment beyond first aid to be medical treatment even when it is provided by someone other than a physician or other licensed health care professional.

What if a physician or other licensed health care professional recommends medical treatment but the employee does not follow the recommendation?

If a physician or other licensed health care professional recommends medical treatment, you will encourage the injured or ill employee to follow that recommendation. However, you must record the case even if the injured or ill employee does not follow the physician or other licensed health care professional's recommendation.

Is every work-related injury or illness case involving a loss of consciousness recordable?

Yes, you must record a work-related injury or illness if the worker becomes unconscious, regardless of the length of time the employee remains unconscious.

What is a "significant" diagnosed injury or illness that is recordable under the general criteria even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness?

Work-related cases involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum must always be recorded under the general criteria at the time of diagnosis by a physician or other licensed health care professional.

Note to §1904.7: OSHA believes that most significant injuries and illnesses will result in one of the criteria listed in §1904.7 (a): death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness. However, there are some significant injuries, such as a punctured eardrum or a fractured toe or rib, for which neither medical treatment nor work restrictions may be recommended. In addition, there are some significant progressive diseases, such as byssinosis, silicosis, and some types of cancer, for which medical treatment or work restrictions may not be recommended at the time of diagnosis but are likely to be recommended as the disease progresses.

OSHA believes that cancer, chronic irreversible diseases, fractured or cracked bones, and punctured eardrums are generally considered significant injuries and illnesses, and must be recorded at the initial diagnosis even if medical treatment or work restrictions are not recommended, or are postponed, in a particular case.

TRAINING RECORD

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

POLICY

Mountain States Casing Company, LLC has implemented this policy to inform employees of the written Job Competency policy in the workplace. This ensures the health and safety of employees at the work site.

RESPONSIBILITIES

"As Designated" Responsibilities

- Ensuring all employees meet the competency requirements for their role
- Ensuring that staff receive suitable safety training and refresher training to carry out their role
- Consulting with staff about the measures to be taken to improve safety programs
- Ensuring, as far as is reasonably practicable, that adequate financial provision and other resources are made available to institute the required safety training

Employees Responsibilities

- Providing documentation as proof that they are qualified to perform their job duties
- Documentation will be provided prior to being assigned a job title and role within the company
- Maintaining technical qualification through refresher training
- Maintaining required safety training through refresher courses

TRAINING

Mountain States Casing Company, LLC will ensure that job-specific training is provided for new or transferred employees. All employees will be trained on the tasks they perform regularly.

VERIFIED COMPETENCY

It is a requirement of Mountain States Casing Company, LLC that prior to an employee being allowed to work independently, a competent person (Supervisor, Lead Hand, Foreman, etc..) will verify that the employee is competent to perform their roles and responsibilities.

ORGANIZATIONAL CHART

Mountain States Casing Company, LLC has established an organizational chart listing the job titles and roles of the jobs in the Company. This chart is posted on the company bulletin board, or a place as designated by management.

The minimum qualifications required to perform each role are determined by education and work experience. The program addresses minimum qualifications before hiring.

TRAINING RECORD

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

POLICY

Mountain States Casing Company, LLC has implemented this policy to ensure no employee is exposed to hazards caused by improper or unsafe use of ladders and/or stairways. Mountain States Casing Company, LLC will provide a training program for each employee using ladders and stairways. The program will enable each employee to recognize hazards related to ladders and stairways and will train each employee in the procedures to be followed to minimize these hazards.

REFERENCES

- §1926.1050 – Ladders and Stairways

RESPONSIBILITIES

Ladder and stairway safety are a responsibility shared between the Company and its employees.

Employer Responsibilities

- Providing and installing all stairway and ladder fall protection systems required by this subpart and will comply with all other pertinent requirements of this subpart before employees begin the work that necessitates the installation and use of stairways, ladders and their respective fall protection systems
- Ensuring that visual safety inspections of ladders and stairways occur on a regular basis
- Training employees
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Safety Committee Responsibilities

- Assist in job site ladders and stairways as necessary
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

- Assist in job site ladder and stairway inspections
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

“As Designated” will ensure each employee has been trained by a competent person in the following areas as applicable: the nature of fall hazards in the work area; the correct procedures for erecting, maintaining and disassembling the fall protection systems to be used; the proper construction, use, placement and care in handling of all stairways and ladders; the maximum intended load-carrying capacities of ladder; and the standards contained in §1926.1050 – Ladders and Stairways.

Retraining will be provided for each employee as necessary so that the employee maintains the understanding and knowledge acquired through previous training required for OSHA compliance.

SAFE PRACTICES

A stairway or ladder will be at all access points with a break-in elevation of 19 in. or more without a ramp, runway, sloped embankment, or personnel hoist.

- Employees will not use any spiral stairways that will not be a permanent part of the structure on which construction work is being performed.
- A double-cleated ladder or two (2) or more separate ladders will be provided when ladders are the only means of access or exit from a working area for 25 or more employees, or when a ladder is to serve simultaneous two-way traffic.
- When a building or structure has only one (1) point of access between levels, that point of access will be kept clear to permit free passage of employees. When work will be performed or equipment will be used such that free passage at that point of access is restricted, a second point of access will be provided and used.
- When a building or structure has two (2) or more points of access between levels, at least one (1) point of access will be kept clear to permit free passage of employees.

Ladder Use

“As Designated” will ensure the following requirements are adhered to concerning the use of all ladders:

- When portable ladders are used for access to an upper landing surface, the ladder side will extend at least three (3) ft. above the upper landing surface to which the ladder is used to gain access or, when such an extension is not possible because of the ladder's length, then the ladder will be secured at its top to a rigid support that will not deflect and a grasping device, such as a grabrail, will be provided to assist employees in mounting and dismounting the ladder. In no case will the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support
- Ladders will be maintained free of oil, grease and other slipping hazards.
- Ladders used by employees will meet OSHA/ANSI specifications.
- Ladder rungs, cleats and steps will be parallel, level and uniformly spaced when the ladder is in position for use.
- Ladders will not be loaded beyond the maximum intended load for which they were built or beyond their manufacturer's rated capacity. Ladders need to have the load capacity needed for the task.
- Rungs, cleats and steps of portable ladders (except as provided below) and fixed ladders (including individual rung/step ladders) will be spaced not less than 10 in. (25 cm.) apart, nor more than 14 in. (36 cm.) apart, as measured between center lines of the rungs, cleats and steps.
- Rungs, cleats and steps of step stools will be not less than eight (8) in. (20 cm.) apart, nor more than 12 in. (31 cm.) apart, as measured between center lines of the rungs, cleats and steps.

- Rungs, cleats and steps of the base section of extension trestle ladders will not be less than eight (8) in. (20 cm.) nor more than 18 in. (46 cm.) apart, as measured between center lines of the rungs, cleats and steps.
- The rung spacing on the extension section of the extension trestle ladder will be not less than six (6) inches (15 cm) nor more than 12 inches (31 cm), as measured between center lines of the rungs, cleats and steps
- The minimum clear distance between the sides of individual rung/step ladders and the minimum clear distance between the side rails of other fixed ladders will be 16 in. (41 cm.).
- The minimum clear distance between side rails for all portable ladders will be 11 1/2 inches (29 cm).
- The rungs of individual rung/step ladders will be shaped such that employees' feet cannot slide off the end of the rungs.
- The rungs and steps of portable metal ladders will be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.
- Ladders will be used only for the purpose for which they were designed.
- Non-self-supporting ladders will be used at a 75º angle.
- Wood job-made ladders with spliced side rails will be used at an angle such that the horizontal distance is one-eighth the working length of the ladder.
- Fixed ladders will be used at a pitch no greater than 90º from the horizontal.
- Ladders will be used only on stable and level surfaces unless secured.
- Ladders will not be used on slippery surfaces without slip-resistant feet unless secured. Slip-resistant feet will not be used as a substitute for care in placing, lashing, or holding a ladder that is used upon slippery surfaces, including flat metal or concrete surfaces that are constructed so they cannot be prevented from becoming slippery.
- Ladders placed where they can be displaced by workplace activities or traffic, such as in passageways, doorways, or driveways, will be secured to prevent accidental displacement or a barricade will be used to keep the activities or traffic away from the ladder.
- The area around the top and bottom of the ladders will be kept clear.
- The top of a non-self-supporting ladder will be placed with the two (2) rails supported equally unless it is equipped with a single support attachment.
- Ladders will not be moved, shifted, or extended while occupied.
- Ladders will have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized electrical equipment.
- The top or top step of a stepladder will not be used as a step.
- Cross-bracing on the rear section of stepladders will not be used for climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections.
- Ladders will be inspected by a competent person before initial use in each work shift and more frequently as necessary, and after any occurrence that could affect their safe use to identify any visible defects that could cause employee injury.
- Portable ladders with structural defects will either be immediately marked in a manner that readily identifies them as defective or be tagged with "DO NOT USE" or similar language and will be withdrawn from service until repaired.
- Fixed ladders with structural defects, such as broken or missing rungs, cleats, or steps, broken or split rails, or corroded components, will be withdrawn from service until repaired. The defective ladder will be withdrawn from service in the following manner: immediately tagged with "Do Not Use" or similar language; marked in a method that readily identifies it as defective; blocked from further use, such as with a plywood attachment that spans several rungs.
- Before the damaged or defective ladder may be returned to service, repairs will be made to restore the ladder to its original design specifications.

- Single-rail ladders will not be used.
- When ascending or descending a ladder, the user will face the ladder.
- Each employee will use at least one (1) hand to grasp the ladder when progressing up and/or down the ladder.
- An employee will not carry any object or load that could cause the employee to lose balance and fall.
- Extension ladders will be placed one (1) unit away from the vertical surface for every four (4) units high.

Stairways

“As Designated” will ensure the following requirements are applied to all stairways:

- Stairways that will not be a permanent part of the structure on which construction work is being performed will have landings of not less than 30 in. in the direction of travel and extend at least 22 in. in width at every 12 ft. or less of vertical rise
- Stairs will be installed between 30º and 50º from horizontal.
- Riser height and tread depth will be uniform within each flight of stairs, including any foundation structure used as one or more treads of the stairs. Variations in riser height or tread depth will not be over 1/4 in. in any stairway system.
- Where doors or gates open directly on a stairway, a platform will be provided and the swing of the door will not reduce the effective width of the platform to less than 20 in.
- Metal pan landings and metal pan treads, when used, will be secured in place before filling with concrete or other material.
- All parts of stairways will be free of hazardous projections, such as protruding nails.
- Slippery conditions on stairways will be eliminated before the stairways are used to reach other levels.
- Except during stairway construction, foot traffic is prohibited on stairways with pan stairs where the treads and/or landings are to be filled in with concrete or other material at a later date unless the stairs are temporarily fitted with wood or other solid material at least to the top edge of each pan. Such temporary treads and landings will be replaced when worn below the level of the top edge of the pan.
- Except during stairway construction, foot traffic is prohibited on skeleton metal stairs where permanent treads and/or landings are to be installed later unless the stairs are fitted with secured temporary treads and landings long enough to cover the entire tread and/or landing area.
- Treads for temporary service will be made of wood or other solid material and will be installed at the full width and depth of the stair.
- Stairways having four or more risers or rising more than 30 in., will be equipped with at least one (1) handrail and one (1) stair rail system along each unprotected side or edge.
- Winding and spiral stairways will be equipped with a handrail offset sufficiently to prevent walking on those portions of the stairways where the tread width is less than 6 in.
- The height of stair rails will be as follows be not less than 36 in. from the upper surface of the stair rail system to the surface of the tread, in line with the face of the riser at the forward edge of the tread..
- Mid-rails, screens, mesh, intermediate vertical members, or equivalent intermediate structural members, will be provided between the top rail of the stair rail system and the stairway steps.
    - Mid-rails will be located at a height midway between the top edge of the stair rail system and the stairway steps

  - Screens or mesh will extend from the top rail to the stairway step and along the entire opening between top rail supports
  - When intermediate vertical members, such as balusters, are used between posts, they will be not more than 19 in. apart
  - Other structural members will be installed such that there are no openings in the stair rail system that are more than 19 in. wide
- Handrails and the top rails of stair rail systems will be capable of withstanding, without failure, a force of at least 200 lbs. applied within two (2) in. of the top edge, in any downward or outward direction, at any point along the top edge.
- The height of handrails will be not more than 37 in. or less than 30 in. from the upper surface of the handrail to the surface of the tread.
- When the top edge of a stair rail system also serves as a handrail, the height of the top edge will be not more than 37 in. or less than 36 in.
- Stair rail systems and handrails will be so surfaced as to prevent injury to employees from punctures or lacerations and to prevent snagging of clothing.
- Handrails will provide an adequate handhold for employees grasping them to avoid falling
- The ends of stair rail systems and handrails will be constructed so as not to constitute a projection hazard.
- Handrails that will not be a permanent part of the structure being built will have a minimum clearance of 3 in. between the handrail and walls, stair rail systems and other objects
- Unprotected sides and edges of stairway landings will be provided with guardrail systems

Inspections

- Ladders used by employees will meet OSHA/ANSI specifications
- Inspect ladders for damage or wear prior to use
- Ladders will be free of oil, grease and other slipping hazards
- A metal spreader or locking device will be provided on each stepladder to hold the front and back sections in an open position when the ladder is being used
- Ladder components will be constructed to prevent injury from punctures or lacerations and prevent snagging of clothing
- Wood ladders will not be coated with any opaque covering, except for identification or warning labels, which may be placed only on one (1) face of a side rail
- Ladders will have nonconductive side rails if they are used where the worker or the ladder could contact exposed energized electrical equipment
- Ladders with conductive metal sides will be marked with the words “WARNING — Do not use around energized electrical equipment” and will not be used around energized electrical equipment.
- Ladder rungs, cleats and steps will be parallel, level and uniformly spaced, when the ladder is in position for use to meet all OSHA/ANSI specifications
- Ladders will be inspected by a competent person for visible defects periodically and after any incident that could affect their safe use
- In addition to each pre-use inspection, a semi-annual inspection of all ladder components will be performed.

TRAINING RECORD

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

POLICY

Mountain States Casing Company, LLC has adopted this lockout/tagout (LOTO) program (also referred to as hazardous energy control) to establish engineering controls and work practices to prevent the unintentional release of hazardous energy during maintenance and servicing of machinery and equipment. Controlling hazardous energies does not just address electrical energy. Other energies include pressurized systems of either gas or liquid such as pneumatic or hydraulic systems, chemical, thermal, radiation, mechanical (such as under tension) and gravity. Control systems are required for all.

Mountain States Casing Company, LLC requires that all employees involved in the maintenance activity will place individual locks and/or tags on each energy isolation device.

REFERENCES

- 29 CFR 1910.147—The Control of Hazardous Energy (Lockout/Tagout)
- NFPA 70E Handbook for Electrical Safety in the Workplace (Arc Flash Protection)

EMPLOYER RESPONSIBILITIES

Mountain States Casing Company, LLC will:

- Establish a program for affixing LOTO devices to energy isolating devices and otherwise disable equipment to prevent unexpected release of energy.
- Ensure the use of safe LOTO procedures by authorized employees.
- Provide all hardware for isolating, securing or blocking equipment from energy sources.
- Conduct and certify inspections of the LOTO procedures at least annually.
- Provide training to ensure the purpose and function of the LOTO program are understood by employees and that the knowledge and skills required for the safe application, use and removal of the energy controls are acquired by authorized employees.
- Ensure training includes limitations of tags in the energy control program (if applicable).
- Inform outside employers who may have employees engaged in activities involving hazardous energy about the LOTO procedures.
- Certify that employees complete and repeat training as needed.

EMPLOYEE RESPONSIBILITIES

Authorized employees (employees who perform maintenance or servicing on equipment that will be locked-out or tagged-out) are expected to:

- Participate in training related to LOTO procedures.
- Comply with all LOTO procedures when maintaining or servicing equipment that requires such controls.
- Only the authorized employees performing the servicing or maintenance will perform the LOTO procedures.
- Review LOTO procedures with the inspector during periodic evaluation.

Affected employees (employees who operate or use equipment where maintenance and servicing require LOTO) will participate and comply with the following:

- Training on the purpose and use of the LOTO procedure.
- Training about the procedure and the prohibition against attempting to restart or reenergize equipment that has been locked-out or tagged-out.

HAZARDS

The unintentional release of hazardous energy during maintenance and servicing of machinery and equipment can present numerous hazards to employees, including:

- Electrocution
- Arc flash
- Being caught in or by equipment
- Crushing
- Amputations

SAFE PRACTICES

Intended Use of Procedure

This procedure establishes the minimum requirements for the lockout of energy-isolating devices on machines or equipment. Any main electrical power disconnect that controls a source of power or material flow will be controlled with a lockout device when employees are maintaining, cleaning, adjusting or servicing machinery or equipment, if the disconnect is not in clear sight of the employee. Employees will also affix a ‘do not start’ tag to all operating controls.

The process stops, isolates from potentially hazardous energy sources and locks out equipment before employees proceed with their work. It also prevents the unexpected start-up or energizing of the machine or equipment from causing injury.

All employees are required to comply with the restrictions and limitations imposed upon them during the use of lockout. Authorized employees will perform the lockout in accordance with this procedure. No employee will attempt to start, energize or use a piece of locked-out equipment.

LOTO is a lifesaving process only. If a piece of equipment, a machine, a system is not being used or not operating properly, it is not to be used until repair or other work is completed. Use a ‘red tag’ process for repair. Once it is being repaired or maintained, then the LOTO procedure is required for lifesaving. Any equipment, tools, machines or systems that are taken out of service for any non-use or discrepancies require a ‘red tag’ not a LOTO procedure (until repair or maintenance).

These procedures do not apply when servicing or maintaining equipment during normal production operations unless:

- The activity involves removing guards or other safety devices
- An employee places themselves in an area where work is being performed
- An employee places themselves in a dangerous area during the normal operating cycle

Authorized Employees

Any employee whose job requires them to perform LOTO to service or maintain a piece of equipment is an ‘authorized employee’ and will comply with all expectations of authorized employees regarding safe LOTO procedures. Other employees who use equipment that require LOTO for maintenance and service, work in areas where such work is being performed or will be affected by LOTO procedures will require training regarding LOTO procedures but are forbidden to perform the work of an authorized employee.

LOTO procedures will not be implemented without appropriate training authorized by management.

LOTO Procedures

See Figure 1 for an outline of the LOTO procedure.

Notify Employees

Before an authorized employee applies LOTO devices, they will notify affected employees to prevent unexpected changes to work conditions that will introduce needless risk and to allow affected employees to clear areas that may be hazardous.

Prepare for Shutdown

Before any employee turns off any equipment, the authorized employee will be aware of the type and magnitude of the energy, the hazards of the energy and the means to control it.

Authorized employees will review LOTO procedures for the piece of equipment and all the possible hazardous energy sources to help ensure an understanding of the controls that are necessary to prevent an injury.

The authorized employee will be especially mindful of energy that can be stored or accumulated after a shutdown.

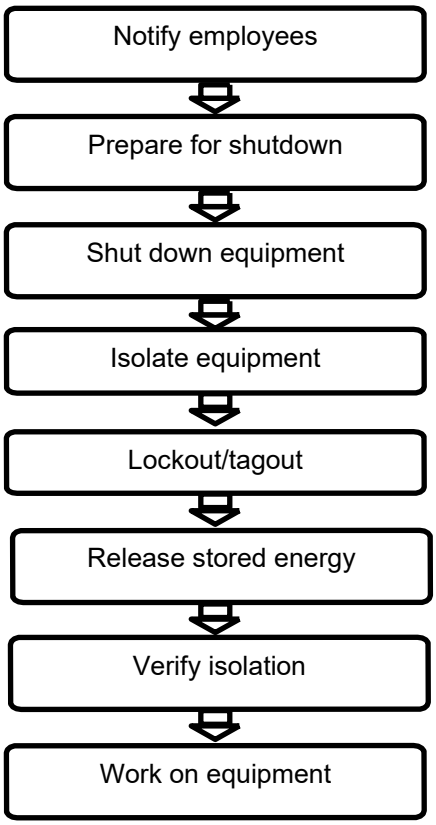

Figure 1

Equipment Shutdown

Shutdown of machinery and equipment will occur in an orderly manner using the shutdown steps from the LOTO procedure associated with each machine or piece of equipment.

Equipment Isolation

All energy isolation devices necessary to control energy to the equipment will be physically located and operated to completely de-energize the equipment and isolate it from energy sources. The authorized employee or team leader will verify the operation of each energy isolation device.

- Disconnect or shut down engines or motors.
- De-energize electrical circuits.
- Eliminate the pressure from the line and lock out the valve holding back the activating substance in hydraulic or pneumatic systems.
- Block machine parts against motion.

Zero energy state is the point at which machinery or equipment has no energy flowing to or from it and as a result, does not have the potential to cause accidental physical harm or injury if handled in this state. Zero energy state is a safety standard set out by the Occupational Health and Safety Act (OSHA) as part of safety procedures to help protect employees from accidental injury or death. Zero energy state is not just turning off a machine and removing the keys. There can be no energy left for the machine to utilize, even if turned off at the time.

De-energizing Lines

If a system operator is in charge of the lines or equipment and their means of disconnection, the employer will designate one (1) employee in the crew to be in charge of the clearance and ensuring procedures are followed.

LOTO

The authorized employee will affix a LOTO device to each energy-isolating device. Lockout devices will hold the energy-isolating device in a “safe” position and the authorized employee will affix tagout devices to indicate the prohibition on moving energy isolating devices from a safe position. If it is possible to lock the device, but only tags are used, attach the tag where the lock would have been; otherwise, locate the tag as close as possible so that it is clear to anyone who might want to operate the equipment.

Locks and/or tags will identify the company employee that applied the locks and/or tags and name of authorized person, time/date of LOTO; reason; cell phone number or a way to contact the authorized person.

OSHA has stated that companies will have adequate LOTO procedures for each specific machine or piece of equipment. These will be written procedures that are on site and readily available to employees. Training will be provided on LOTO to both authorized and affected employees. Interlocks may not be used as lockout or as equivalent lockout protection.

Release of Stored Energy

Immediately after applying LOTO devices, the authorized employee will ensure all potentially hazardous stored or residual energy is relieved, disconnected, restrained and rendered safe.

- Discharge capacitors
- Block, clamp, secure in position or totally relieve the compression or tension in applicable mechanisms
- Lower to the lowest position all suspended mechanisms or parts that normally cycle to a lower position and clamp, block or secure the mechanism or parts in position
- Vent fluids from pressure vessels, tanks or accumulators– but never vent toxic, flammable or explosive substances directly into the atmosphere

If stored energy can be re-accumulated, the authorized employee will verify that the energy is isolated until maintenance is complete or the energy no longer exists.

Verify Isolation

The authorized employee will verify the machinery or equipment is actually isolated and de-energized before starting work on locked-out or tagged-out equipment.

A zero-energy state will be achieved and checked with a multimeter.

Steps for Release from LOTO

See Figure 2 for an outline of the steps to release equipment from LOTO.

Check equipment

Make sure machinery or equipment is properly reassembled. Inspect machinery or equipment to ensure removal of nonessential items.

Check Employees

Make sure all employees are safely outside danger zones. Notify affected employees about the removal of LOTO devices and that energy is going to be re-applied. Verify controls are in neutral.

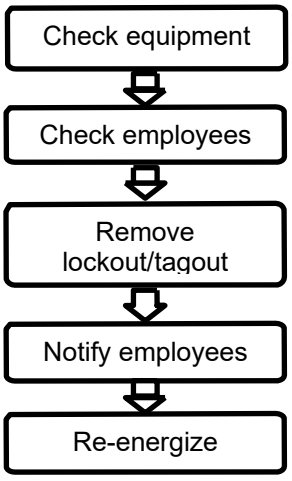

Figure 2

Remove Devices

Only the authorized employee who applied the LOTO device may remove the device. If unavailable, follow the process detailed in 29 CFR 1910.147e (3). Re-energize the equipment.

Notify Employees

The authorized employee will notify all affected employees that the LOTO devices have been removed and the equipment is back in service.

REQUIREMENTS

Employee Leaves Before Returning System to Service

If the authorized employee is not available to remove their LOTO device, another authorized employee may begin the following suggested procedure:

1. Verify that authorized employee who applied the device is not on the facility.
2. Make all reasonable efforts to inform them that their LOTO device has been removed.
3. Verify repair to equipment is complete.
4. Inform affected employees.
5. Ensure all tools or devices are removed from the equipment/machine.
6. Ensure all guards are in place and function.
7. Ensure no employee is in harm's way.
8. Cut/remove lock and tag.
9. Re-energize.
10. Explain the reason for removal, document who gave authorization for removal, document that the authorized person has been notified.
11. Document all the above.

Temporary LOTO Removal

Whenever authorized employees remove LOTO devices to test or position machines and equipment or their components, the authorized employee will complete the following procedures in the sequence presented:

12. Clear the machine or equipment of tools and materials.
13. Remove employees from danger zones.
14. Remove LOTO devices.
15. Energize and proceed with testing or positioning.
16. De-energize all systems and re-apply LOTO devices.

Outside Employee

Employees of another company engaged in servicing or maintenance of equipment that requires LOTO will follow LOTO procedures that provide at least as much protection as Mountain States Casing Company, LLC 's established procedures for that equipment. To ensure safety, management from our company and representatives from the outside employer will inform one another of their respective LOTO procedures.

The owner also will ensure employees understand and comply with contracted employees LOTO procedures as appropriate.

Group LOTO

When a group (or groups) of employees performs servicing, the group(s) will use a procedure that provides protection equivalent to the protection provided by the personal LOTO device(s). This

includes situations involving multiple groups of employees, shift changes and other contractors within the area. An authorized person will be in charge of all group lockout operations to ensure the proper procedures are followed.

Transfer of Control

Procedures during shift changes or changes to employees will provide for an orderly transfer of LOTO device protection and minimize exposure to hazards from the unexpected energizing or start-up of the machine or equipment, or the release of stored energy for both the oncoming and off-going employees.

Control will not be removed during the transfer. The oncoming authorized person will meet with outgoing authorized person (if possible). The oncoming individual will first place their lock and tag for control. The outgoing authorized person will then remove their lock and tag.

Tag Out Only

If an energy isolating device is capable of being locked-out, the employer's energy control program will utilize lockout, unless the employer can demonstrate that the use of a tagout system will provide full employee protection. When a tagout device is used on an energy isolating device that is not capable of being locked out, the tagout device will be attached at the same location that the lockout device would have been attached, and the employer will demonstrate that the tagout program will provide a level of safety equivalent to that obtained by using a lockout program.

In demonstrating that a level of safety is achieved in the tagout program equivalent to the level of safety obtained by using a lockout program, the employer will demonstrate full compliance with all tagout-related provisions of the standard, together with such additional elements as are necessary to provide the equivalent safety available from the use of a lockout device. Additional means to be considered as part of the demonstration of full employee protection will include the implementation of additional safety measures such as the removal of an isolating circuit element, blocking of a controlling switch, opening of an extra disconnecting device or the removal of a valve handle to reduce the likelihood of inadvertent energization.

After January 2, 1990, whenever a major repair, renovation or modification of a machine or equipment is performed, and whenever new machines or equipment are installed, energy isolating devices for such machine or equipment will be designed to accept a lockout device.

When LOTO is not Feasible

If there is no possible way to control the energy, nor hang a tag, the employer will document with a process that provides a level of protection to all involved. If the system will have work done while energized, the direction of NFPA 70E will be followed for energized work.

LOTO Devices and Equipment

Employees will be provided with protective hardware and materials (locks, tags, wedges, adapter pins, self-locking fasteners, etc.) for isolating, securing or blocking equipment from energy sources. If a device is altered, damaged or destroyed in a way that compromises its ability to protect the authorized employee, the authorized employee will inform a supervisor immediately and not attempt to use the device.

Whenever replacement or major repair, renovation or modification of a machine or equipment is performed and whenever new machines or equipment are installed, energy isolating devices for such machine or equipment will be designed to accept a lockout device.

Singularly Identified

Devices used in lockout and tagout procedures will not be used for any purpose other than for isolating, securing or blocking equipment from energy sources and no devices other than those specified in the LOTO procedure will be used to that end.

Durable

The devices used for LOTO will be able to withstand the environmental and weather conditions present during use. Tagout devices need to remain legible and not deteriorate regardless of weather conditions or corrosive environments.

Standardized

At the worksite, devices used to isolate, secure or block equipment from energy sources will be consistent in color, shape or size. Tagout devices will have a standardized design.

Substantial

Lockout devices will have structural integrity to require excessive force or specialized tools to remove them. Tagout devices and their means of attachment are needed to prevent inadvertent removal. The means of attachment will not be reusable and need to have an unlocking strength of at least 50 lbs. The general design and basic characteristics of tagout attachment means will be at least equivalent to a one-piece, all environment-tolerant nylon cable tie.

Identifiable

Any device used to isolate, secure or block equipment from energy sources will indicate the identity of the employee applying the device.

Risk Assessments, Periodic Inspections and Program Review

“As Designated” or the designee, will conduct risk assessments and periodic inspections of the LOTO procedure to ensure the employees are following procedure and meeting all applicable standards. An annual program review (audit) will also be conducted. If “As Designated” uses the inspected energy control procedure, another authorized employee who does not use the energy control procedure will perform the inspection. The inspector will review with each authorized employee that employee’s responsibilities under the LOTO procedure and correct any identified deviation or inadequacy in the procedure. Where tagout systems are used, the review will include a detail of the limitations of tags relative to locks in hazardous energy control.

The Company will conduct a periodic inspection of the energy control procedure, at least annually, to ensure that the procedure and the requirements of 29 CFR 1910.147(c)(6)(i) are being followed. Periodic inspection will be performed by an authorized company employee other than the ones(s) utilizing the energy control procedure being inspected. Periodic inspection will be conducted to correct any deviations or inadequacies identified. Where lockout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected. The Company will certify that the periodic inspections have been performed. The certification must identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection, and the person performing the inspection. Annual inspection will insure that LOTO program implementation, review of the associate or designated employee performing the assessment and proper recordkeeping are included and executed properly.

Certification

Each periodic inspection will be certified. The certification will identify the following:

- The machine or equipment on which the LOTO procedure was used
- The date of the inspection
- The employees included in the inspection
- The person performing the inspection

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Due to the wide variety of machines and equipment that employees may be required to repair or maintain, the PPE needed for the task may vary. At a minimum, PPE will include:

- Hard hats (class “E”)
- Safety glasses or goggles
- Safety-toed electrically rated safety shoes or boots
- Work gloves (non-conducting or chemical resistant if needed)
- Respiratory and/or fall protection (depending on the type of work being performed and the location)

TRAINING

Every employee will be trained in LOTO procedures as appropriate to the employee’s duties at no cost to the employee during working hours.

All training material will be appropriate in content and vocabulary to the educational level, literacy and language of employees.

Training Components

Employees whose work operations are in an area where energy control procedures may be used will be trained in the following minimum elements:

- The purpose and function of the LOTO program
- The prohibition of attempts to restart or reenergize locked-out or tagged-out equipment
- When tag-out systems are used, the following limitations of tags for hazardous energy control will be considered:
  - Tags are essentially warning devices affixed to energy isolating devices and do not provide the physical restraint on those devices that is provided by a lock.
  - When a tag is attached to an energy isolating means, it is not to be removed without authorization of the authorized person. It is never to be bypassed, ignored or otherwise defeated.
  - Tags will be legible and understandable by all authorized employees, affected employees and all other employees whose work operations are or may be in the area, in order to be effective.
  - Tags and their means of attachment will be made of materials that can withstand the environmental conditions encountered in the workplace.
  - Tags may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program.
  - Tags will be attached securely to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.
  - The irregular removal of the lock and tag process will be part of training.

Training for employees authorized to service and maintain equipment will include the following:

- The recognition of hazardous energy sources
- The type and magnitude of energy available in the workplace
- The methods and means necessary for energy isolation and control

Training Records

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of individuals conducting the training
- The names and job titles of all individuals attending the training sessions

Employee training records will be retained for the length of their employment.

Retraining

Retraining will reestablish proficiency and introduce new or different control measures whenever the following occur:

- A change in job assignment, equipment or process presents a new hazard
- There is a change in the LOTO procedures
- A periodic inspection reveals deviations from or inadequacies in employee knowledge or use of the LOTO procedures

FORMS AND ATTACHMENTS

On the following pages, please find the following documents:

- Lockout/Tagout (LOTO) Procedure
- Lockout/Tagout (LOTO) Inspection Certification Form

These forms may be reproduced freely for the purposes of implementing and maintaining a safety and health program.

Lockout/Tagout (LOTO)

Company:	Equipment

This procedure establishes the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is done on machines or equipment. It will be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources and locked-out before employees perform any servicing or maintenance where the unexpected energizing or start-up of the machine or equipment or release of stored energy will cause injury.

1. Notify Employees

Notify all affected employees that servicing or maintenance is required on a machine or equipment and that the machine or equipment will be shut down and locked-out to perform the servicing or maintenance. (Document name or job title of authorized and affected employees)

Authorized Employees	Affected Employees

2. Prepare for Shutdown

The authorized employee will refer to the Company procedure to identify the type and magnitude of the energy that the machine or equipment utilizes, will understand the hazards of the energy and will know the methods to control the energy.

Type(s) of Energy	Magnitude
☐ Mechanical	
☐ Potential	
☐ Electrical	
☐ Thermal	
☐ Chemical	

3. Equipment Shutdown

If the machine or equipment is operating, shut it down by the normal stopping procedure (depress the stop button, open switch , close valve, etc.).

Type of Operating Controls:

Location of Operating Controls:

Shutdown Procedure:

4. Equipment Isolation

Set the energy isolating device(s) so that the machine or equipment is isolated from the energy source(s).

Type(s) of energy isolating device(s)	Location(s) of energy isolating device(s)

5. Lockout

The energy-isolating device(s) with assigned individual lock(s)

6. Release Stored Energy

Stored or residual energy (such as that in capacitors, springs, elevated/suspended machine members, hydraulic systems, etc.) will be dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down, etc.

Type(s) of Energy	Method(s) to Dissipate or Restrain
☐ Mechanical	
☐ Potential	
☐ Electrical	
☐ Thermal	
☐ Chemical	

7. Verify Isolation

Ensure that the equipment is disconnected from the energy source(s) by first checking that no employees are exposed, then verify the isolation of the equipment by operating the push button or other normal operating control(s) or by testing to make certain the equipment will not operate. Caution: Return operating control(s) to neutral or "off" position after verifying the isolation of the equipment.

Method to Verify Isolation

8. The Machine or Equipment is now Locked-out.

Restoring Equipment to Service

When the servicing or maintenance is completed and the machine or equipment is ready to return to normal operating condition, the following steps will be taken:

1. Check the machine or equipment and the immediate area around the machine to ensure that nonessential items have been removed and that the machine or equipment components are operationally intact.
2. Check the work area to ensure that all employees have been safely positioned or removed from the area.
3. Verify that the controls are in neutral.
4. Remove the lockout devices and reenergize the machine or equipment.

   NOTE: The removal of some forms of blocking may require re-energizing of the machine before safe removal.

5. Notify affected employees that the servicing or maintenance is completed and the machine or equipment is ready for use.

Lockout/Tagout (LOTO) Inspection Certification

I certify that _____ was inspected on this date using LOTO procedures. The inspection was performed while working on _____.

_____	_____	_____
Authorized Employee (Print)	Signature	Date
_____	_____	_____
Inspector (Print)	Signature	Date

POLICY

Mountain States Casing Company, LLC has adopted this policy to inform employees of the written Pandemic Preparedness Policy. This ensures the safety and health of the employees.

Mountain States Casing Company, LLC will encourage employees to use the following items, which will be provided at no cost, to help prevent the spread of disease in the workplace: handwashing facilities, hand sanitizers, tissues, no-touch trash cans, hand soap and disposable towels.

EMPLOYER RESPONSIBILITIES

Mountain States Casing Company, LLC has appointed “As Designated” as the workplace coordinator who will be responsible for the following:

- Developing and implementing a worksite-specific pandemic disease plan
- Managing issues of pandemic disease and its impacts on the workplace
- Developing a method for managing local regulatory reporting requirements
- Developing and implementing protocols for response to ill individuals
- Coordinating with the local health department and health care providers in advance to develop and implement protocols for response to ill individuals

HAZARDS

In the event of a pandemic, a specific workplace hazard assessment for pandemic purposes will be conducted. Hazards associated with pandemics include:

- Increased risk of infectious pathogens **spilling over** from animals to humans
- Development of anti-microbial resistance
- Spread of infectious diseases through global travel and trade
- Acts of bioterrorism
- Weak public health infrastructures
- Illness and death

PROCEDURES (SAFE WORK PRACTICES)

Work at Home and Stay at Home

All employees are encouraged to stay at home when ill, when caring for ill family members, when caring for children during school closure or if under such orders from governmental authorities, without fear of reprisal. Flexible work policies such as telecommuting and other work-at-home strategies will be developed on an individual basis.

Business Continuity Plans

If a substantial percentage of employees become ill, a strategy for continuation of work operations will be developed. Business continuity plans will be prepared so that if significant absenteeism or changes in business practices are required due to governmental shelter-in-place orders, business operations can be effectively maintained.

Immunizations

Employees are encouraged to obtain appropriate immunizations to help avoid disease. Granting time off work to obtain the vaccine will be considered when vaccines become available.

Internal Communication Procedures

To ensure proper internal communication, Mountain States Casing Company, LLC will develop the following:

- Key contacts
- A chain of communications
- Contact numbers for employees
- Processes for tracking business
- Employee status

External Customer Communications

To ensure effective external/customer communications, Mountain States Casing Company, LLC has developed a procedure to notify key contacts including both customers and suppliers, in the event an outbreak has impacted the Company's ability to perform services. The procedure will include notification to the customers and suppliers when operations resume.

Social Distancing

If an outbreak or increased level of disease is in progress, it is the determination of Mountain States Casing Company, LLC to limit large or crowded gatherings of employees.

Social distancing, including the space between employee work areas and decreasing the possibility of contact, will be considered.

Routine Cleaning

It is the policy of Mountain States Casing Company, LLC to frequently clean work surfaces that employees utilize, as well as all areas that are likely to have frequent hand contact. These areas are to be cleaned routinely and when visibly soiled. Areas to be cleaned include desktops, keyboards, lunch tables, doorknobs, faucets, handrails, water fountains, etc.

Plan, Emergency Communication Test and Lessons Learned

The Plan and Emergency Communications strategies will be tested periodically, for example, through a Tabletop exercise conducted annually, to ensure effectiveness.

Following a pandemic event, Mountain States Casing Company, LLC will institute a continuous improvement process for the pandemic disease program and incorporate lessons learned into plan modifications.

TRAINING

Mountain States Casing Company, LLC will provide periodic training on illness prevention, how to avoid the spread of disease and company policies concerning illness.

The employees will be trained on the following: health issues, initial disease symptoms, preventing the spread of the disease and when it is appropriate to return to work.

Communicating information with non-English speaking employees or those with disabilities will be considered.

Training Record

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

This space is intentionally left blank for printing purposes

POLICY

Mountain States Casing Company, LLC has implemented this safety program to ensure the protection of employees from hazards on the job which may be safeguarded against by the proper use of personal protective equipment (PPE).

“As Designated” is the supervisor responsible for ensuring the following work practices are enforced.

PPE with proper fitting will be provided at no cost for all work required by Mountain States Casing Company, LLC and employees are required by company policy to always use only proper company PPE when required on the job or on company property. Failure to use PPE will result in disciplinary action against the violating employee.

- “As Designated” will ensure that if employee-owned PPE is used, Mountain States Casing Company, LLC is responsible that it will be adequate for the application, properly maintained, and kept in sanitary condition.
- PPE will be issued and fitted to each affected employee individually. Employees will demonstrate proficiency in donning and doffing equipment, and proper techniques of cleaning and maintaining their respective equipment.
- Defective or damaged PPE will not be used. Defective or damaged PPE will be immediately tagged “out of service”, removed from service, and replaced with serviceable equipment. PPE will be inspected by the individual employee at the beginning of each work shift.
- PPE will be used, stored, and maintained in a sanitary condition. All PPE will be cleaned and/or disinfected and stored according to manufacturer’s recommendations.

TRAINING

“As Designated” will ensure all employees are properly trained in the recognition and assessment of hazards, the proper selection and use of PPE required for the hazard and how to control the hazards.

PPE training will include when it is necessary; what is necessary; how to don, doff, adjust, and wear PPE; the limitations, proper care, maintenance, useful life and disposal of PPE.

Retraining of employees is required when the workplace changes, making the earlier training obsolete; the type of PPE changes; or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding.

Employees will be trained on initial hiring to use, maintain, clean and disinfect, store, and service PPE properly. Employees will receive refresher training on PPE at least annually, or as work requirements, changing job assignments, changing equipment, or environment warrants it. Any employee who demonstrates a lack of knowledge or understanding of any aspect of PPE use or maintenance will be re-trained. An employee will verify his/her understanding of training content as a condition of employment.

All training will be documented and will include the employee’s name, the dates of training and the certification subject.

HAZARD ASSESSMENT

“As Designated” will perform a hazard assessment of each jobsite before work begins to ascertain if hazards are present or likely to be encountered, what engineering controls may be implemented to minimize hazards, and what PPE is necessary for the performance of the job. The hazard assessment will include the certifier's name, signature, date(s), and identification of assessment documents. Affected employees will be notified of hazards, engineering controls needed, and PPE required.

GENERAL REQUIREMENTS

PPE devices will be relied on as the final protection against hazards, used in conjunction with guards, engineering controls, and sound manufacturing practices. It is necessary to consider certain general guidelines for assessing the foot, head, eye and face, and hand hazard situations that exist in an occupational operation or process, and to match the protective devices to the hazard. It is the responsibility of “As Designated” to exercise common sense and appropriate expertise to accomplish these tasks.

After completion of a hazard identification and risk assessment (HIRA), the general procedure for selection of protective equipment is to:

- Become familiar with the potential hazards and the type of protective equipment that is available, and what it can do, i.e., splash protection, impact protection, etc.
- Compare the hazards associated with the environment, i.e., impact velocities, masses, projectile shape, radiation intensities, with the capabilities of the available protective equipment.
- Select the protective equipment which ensures a level of protection greater than the minimum required to protect employees from the hazards.
- Fit the user with the protective device and give instructions on care and use of the PPE. It is very important that end users be made aware of all warning labels for and limitations of their PPE.

PERSONAL WORK CLOTHING

The minimum work clothing acceptable is long pants, good work shoes or boots, and a shirt that completely covers the employees' shoulders (minimum four (4) inch sleeves) and provides adequate protection against such hazards as concrete splash, abrasions to the skin, oil or grease spills, and slag from welding or cutting.

Welders will be cautioned against wearing any type of highly flammable clothing, such as polyesters, double-knits, etc. Wool and specially treated cotton are two (2) natural fibers that are fire-resistant and comfortable. Heat-resistant material, such as leather, is used to protect against dry heat, flames, and molten material. Fire-resistant clothing also protects from high workplace temperature and electrical operations.

For the most part, construction employees will wear clothing that is reasonably snug, particularly about the neck, wrists, and ankles. Employees will not wear loose clothing, rings, watches, necklaces, or long hair, all of which may catch in power driven equipment.

Rubber and rubberized fabrics, neoprene and plastics protect against some acids and chemicals. Disposable chemical suits are used to protect against dusty materials and materials that splash. For materials that have are extremely toxic, a fully encapsulated suit may be necessary.

Arc rated clothing will be worn during work activities that have been identified to present an arc flash potential. The clothing will be rated for the arc flash potential of the task. Such clothing may include long sleeved flame resistant (FR) shirts, FR pants, face shield, and appropriate class rubber gloves. The employee will not wear synthetic fiber clothing under FR clothing. Refer to the electrical safety and arc flash policy for clothing required for arc flash potential posed by the task and equipment.

EYE AND FACE PROTECTION

To prevent possible eye and face injuries suitable eye protection will be worn. Potential eye and face injuries occur from flying objects, liquid chemicals, acids or caustic liquids, molten metal, chemical gases or vapors, and light radiation. Eye protection will provide adequate protection, be reasonably comfortable, fit snugly, be durable, capable of being disinfected and cleaned, kept sanitary and in good repair. When selecting eye and face protection consider what kind and degree of hazard is present.

Eye or face protection will comply with American National Standards Institute (ANSI) Z87.1. If you have questions about eye or face protection, ask your supervisor or refer to the manufacture instructions.

FOOT AND LEG PROTECTION

Most foot injuries occur from employees not wearing protective footwear. The typical foot injury is caused from objects falling fewer than four (4) ft. For protection from falling or rolling objects, sharp objects, molten metal, hot surfaces, and slippery surfaces, employees will use appropriate foot guards, steel toe safety shoes, steel toe safety boots, metatarsal guards and leggings. Leggings protect the lower leg and feet from molten metal and welding sparks.

Leather work shoes/boots are required, and safety shoes are recommended for use by all employees. Safety shoes will be sturdy, have an impact resistant toe, and have puncture resistant soles. Protective footwear will comply with ANSI Z41.

When working with wet concrete, employees will wear rubber boots.

Shoes and boots will be kept in good repair, and those with worn heels of thin or worn soles will not be permitted. In addition, the wearing of sneakers, sandals, or shoes that have been slit or have holes cut in them will not be permitted.

HAND AND ARM PROTECTION

Arm and hand protection are used to prevent skin contact and absorption with potentially harmful materials, to prevent burns and electrical shock. Where needed, employees will wear work gloves in good condition, which are suited to the type of work involved. Some of the factors considered when gloves were selected are the toxic properties of chemicals handled by employees, the degree of dexterity required, duration, frequency, degree of exposure to the hazards, and physical stress that will be applied. The company relies on the manufacturers' standard test procedures for hand and arm protection performance characteristics.

Employees who are required to operate or work around drill presses, power saws and similar rotating machinery will not wear gloves.

Special type gloves such as neoprene or rubber to handle chemicals will be issued to those employees who have a need for them. Welders will wear gloves during settling operations.

HEAD PROTECTION (HARD HATS)

Employees will wear protective helmets when working in areas where there is a potential for injury to the head from falling objects. Protective helmets designed to reduce electrical shock hazard will be worn by each such affected employee when near exposed electrical conductors which will contact the head.

All employees that wear company issued hard hats will always wear them when working on construction projects or areas of an existing facility, which has been designated as a "hard hat area." This includes visitors, subcontractors, engineers, inspectors, and anyone else who has authorization to be on the project site.

Head protection will be worn properly with the brim in front. Hard hats which have been altered by drilling or cutting will not be permitted, nor will those hat which have been altered by the addition of any items on the outside of the hat other than safety, or site stickers. When it is necessary to use additional PPE, which will be attached to the hard hat, only those hard hats designed for this purpose may be used.

Protective hard hats will meet ANSI requirements personal protection-protective headgear for industrial workers Z89.1. Electrical employees will wear hard hats that are rated for the voltage of the equipment where work is being performed.

RESPIRATORY PROTECTION

Company issued respiratory protective devices, appropriate for the hazard, will be used where airborne contaminates, such as fibers, dust, smoke, vapors and mist exist and may exceed acceptable levels. Respiratory protective devices will be used in accordance with NIOSH requirements.

HEARING PROTECTION

Hearing protection will be worn in areas that exceed 85 dBA. Refer to 28, occupational noise exposure program.

FULL BODY HARNESS AND LANYARDS

Harnesses with lanyards in use will be worn by all employees who are working at elevated levels which are not protected by standard handrails, or when working from suspended scaffolds. Employees are required to wear and use full body harnesses to protect them from falling when they are exposed to falls from heights of six (6) ft. or more. If they are working on powered platforms or over machinery, moving equipment or objects posing an impalement hazard, or in the case of entering a confined space, with an attended lifeline, 100% full protection is required. This might include the need for two (2) lanyards per belt. All harnesses and lanyards will be inspected, and each inspection documented with the harness serial number. Inspections will be performed by supervision. Quick release belts will only be used when working over bodies of water. Lanyards will have locking snaps that require two (2) actions to open. Refer to the fall protection program for complete requirements.

FLOTATION VESTS

US Coast Guard approved flotation vests will be worn by all employees when working on barges, floating pipelines, or plants, or on structures extending over water, that are not protected by adequate standard handrails. In addition, any employee who is working over the side of a vessel or structure, which is extended over water, or in any area where a drowning hazard exists, will wear an approved flotation vest.

TRAFFIC VESTS

Employees will wear, as a minimum, an ANSI Class II fluorescent orange or lime traffic safety vest when working within 15 ft. of a roadway or in a parking lot. Vests will also be used when directing traffic on a construction site.

ELECTRICAL PROTECTION

- Employees working in areas where there are potential electrical hazards will be provided with, and use, electrical protective equipment that is appropriate for the specific parts of the body to be protected and for the work to be performed.
- Equipment will be maintained in a safe, reliable condition and will be periodically inspected and/or tested. If the insulating capability of protective equipment may be subject to damage during use, the insulating material will be protected (e.g., an outer covering of leather used for the protection of rubber insulating material).
- Employees will wear nonconductive head protection wherever there is a danger of head injury from electric shock or burns due to contact with exposed energized parts.
- Employees will wear protective equipment for the eyes or face wherever there is danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from electrical explosion.
- Each employee will use insulated tools or handling equipment if they might contact conductors or parts. If the insulating capability of insulated tools or handling equipment is subject to damage, the insulating material will be protected. Ropes and handlines used near exposed energized parts will be nonconductive.
- Protective shields, protective barriers, or insulating materials will be used to protect each employee from shock, burns, or other electrically related injuries while that employee is working near exposed energized parts.

When normally enclosed live parts are exposed for maintenance or repair, they will be guarded to protect unqualified people from contact with the live parts. “As Designated” utilizes alerting techniques used to warn and protect employees from hazards which will cause injury due to electric shock, burns or failure of electric equipment parts. (Alerting techniques can take the form of safety signs and tags, barricades and attendants.)

Training Record

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

This space is intentionally left blank for printing purposes

POLICY

Mountain States Casing Company, LLC has implemented this policy to prevent or minimize the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals and to ensure no employee is exposed to toxic or hazardous material at levels above the permissible exposure limits (PEL).

REFERENCES

- §1910.119 – Process Safety Management of Highly Hazardous Chemicals
- §1910.1200 – Hazard Communication Standard

RESPONSIBILITIES

Employer Responsibilities

- Developing a written plan of action to implement employee participation required by process safety management (PSM)
- Consulting with employees and their representatives on the conduct and development of the process hazard analysis (PHA) and the development of the other elements of process management
- Training each employee in the necessary work practices to perform their job duties
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing PHA whenever there is a significant change to any element of the job or there has been an injury or illness
- Teach employees about the hazards of their jobs, specifically any: Potential fire, explosions, or toxic release

Safety Committee Responsibilities

- Assist in PHA as necessary
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

- Assist in PHA
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

Employees will be told that the purpose of PSM is to prevent or minimize the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals in various industries such as refineries, etc. Each employee will be trained in the overview of the process and its operating procedures for every process they are involved in or newly assigned to. The training will emphasize the process's specific safety and health hazards, emergency operations, shutdown and other applicable safe work practices.

Mountain States Casing Company, LLC will document the identity of the employee (permanent or contract), the date of training and the means used to verify that the employee understood the training.

Hazard communication will cover known workplace hazards, including how to avoid and abate them. Mountain States Casing Company, LLC employees are required to abide by all company safety policies, procedures and their supervisor's instruction. Contract employees will be advised of all hazards to which they may be exposed in the workplace.

PROCEDURES

Process Safety Information

"As Designated" will compile all written process safety information before conducting any PHA. The compilation will be completed under the same schedule required for the PHA. The PHA will include information on the hazards of the chemicals used or produced by the process; the technology of the process; the equipment in the process.

Safety data sheets (SDS) meeting the Hazard Communication Standard requirements may be used to comply with information on the hazards requirement to the extent they contain the required information.

Process Hazard Analysis

Before starting work, "As Designated" will perform a PHA of the worksite. Immediately upon completion of the hazard assessment, "As Designated" will make their customer, employer, or owner of the host facility or job site aware of any identified and unique hazards presented by work performed by Mountain States Casing Company, LLC.

The PHA will focus on equipment, instrumentation, utilities, human actions (routine and non-routine) and external factors that might impact the process. The PHA team will determine and document the priority order for conducting PHA that includes such considerations as the extent of the process hazards, the number of potentially affected employees, the age of the process and the operating history of the process.

Standard Operating Practices (SOP)

Operating procedures describe tasks to be performed, data to be recorded, operating conditions to be maintained, samples to be collected and safety and health precautions to be taken. The procedures will be accurate, understandable to employees and will be reviewed as often as necessary to ensure that they reflect current operating practices, including changes that result from changes in process chemicals, technology and equipment and changes to facilities. The employer will certify annually that these operating procedures are current and accurate. "As Designated" will use the process safety information package as a resource to better ensure that the operating procedures and practices are consistent with the known hazards of the chemicals in the process and that the operating parameters are accurate.

SOP will be written so that an experienced operator unfamiliar with a particular process unit will run the unit with minimal supervision or help from other operators, or the least experienced operator released for unsupervised work will run the unit.

Mountain States Casing Company, LLC employees will abide by the employer's safety work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.

Pre-Start-Up Safety Review

The initial start-up procedures and normal operating procedures need to be fully evaluated by "As Designated" and the work team as part of the pre-start-up review to ensure a safe transfer into the normal operating mode for meeting the process parameters. Piping and instrument diagrams (P&ID) are to be completed along with having the operating procedures in place and the operating staff trained to run the process before start-up. Any incident investigation recommendations, compliance audits, or PHA recommendations need to be reviewed as well to see what impacts they may have on the process before beginning the start-up.

Mechanical Integrity Program

"As Designated" will establish and implement written procedures to maintain the ongoing integrity of process equipment. Elements of a mechanical integrity program include the identification and categorization of equipment and instrumentation, inspections and tests, testing and inspection frequencies, development of maintenance procedures, training of maintenance employees, the establishment of criteria for acceptable test results, documentation of test and inspection results and documentation of manufacturer recommendations as to meantime to failure for equipment and instrumentation.

Hot Work Permit

A permit will be issued by "As Designated" for hot work operations conducted on or near a covered process. Contractors will not perform hot work until a hot work permit is obtained from the hiring client. The permit will document that the fire prevention and protection rules for welding, cutting and brazing have been implemented before beginning the hot work operations. It will also indicate the authorized dates and identify the object to be worked on. The permit will be kept on file until completion of the hot work operations.

Management of Change (MOC)

"As Designated" will prepare written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, operating procedures and facilities that affect a covered process. Revisions in documents, such as P&ID, raw materials, operating procedures, mechanical integrity programs, electrical classifications, etc. will be recorded and kept in an accessible location, This will ensure that design changes are permanently available to operations when drawings and procedure manuals are updated. Provide copies to process employees as well as to PHA team members when PHA is being done or updated.

Employees involved in operating a process and maintenance whose job tasks will be affected by a change in the process will be informed of, and trained in, the change before the start-up of the process or affected part of the process.

The following items will be included in the MOC proposal:

- Technical basis for the change
- Impact of change on health and safety
- Modifications to operating procedures

- Necessary time period for the change
- Authorization requirements for the proposed change

Incident Investigation

Incident investigation is the process of identifying the underlying causes of incidents and implementing steps to prevent similar events from occurring. The intent of an incident investigation is for employers to learn from past experiences and thus avoid repeating past mistakes. The incidents for which OSHA expects employers to become aware and to investigate are the types that result in or will reasonably have resulted in a catastrophic release. Some of the events are sometimes referred to as “near misses”, meaning that a §1910.119 – consequence did not occur but could have.

Incidents that have resulted in or will reasonably have resulted in a catastrophic release of highly hazardous chemicals in the workplace will be investigated within 48 hours of the incident.

All employees are required to report incidents and near misses to their supervisors. All incidents and near misses will also be immediately reported to the host employer.

A report will be prepared after the investigation which includes at a minimum:

- Date of incident
- Date investigation began
- A description of the incident
- The factors that contributed to the incident
- Any recommendations resulting from the investigation

The employer will establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions will be documented. The report will be reviewed with all affected employee and retained for five (5) years.

Emergency Planning and Response

Address what actions employees will take when there is an unwanted release of highly hazardous chemicals. “As Designated” will select how many different emergency preparedness procedures or lines of defense are needed. Develop the necessary plans and procedures, appropriately train employees in their emergency duties and responsibilities and implement these lines of defense.

The employer will establish and implement an emergency action plan for the entire plant in accordance with the provisions of 29 CFR 1910.38. In addition, the emergency action plan will include procedures for handling small releases. Employers covered under this standard may also be subject to the hazardous waste and emergency response provisions contained in 29 CFR 1910.120 (a), (p) and (q).

COMPLIANCE AUDIT

“As Designated” or an assembled trained team of people will audit the PSM system and program. Employers will certify that they have evaluated compliance with the provisions of this section at least every three (3) years to verify that the procedures and practices developed under the standard are adequate and are being followed.

A small process or plant may need at least one (1) knowledgeable person to conduct an audit. The audit is to include an evaluation of the design and effectiveness of the PSM system and a field inspection of the safety and health conditions and practices to verify that the employer's systems are effectively implemented. The audit will be conducted or lead by a person knowledgeable in audit techniques and impartial toward the facility or area being audited. A report of the findings of the audit

will be developed. The employer will promptly determine and document an appropriate response to each of the findings of the compliance audit and document that deficiencies have been corrected.

Employers will retain the two (2) most recent compliance audit reports.

The essential elements of an audit program include planning, staffing, conducting the audit, evaluation and corrective action, follow-up and documentation.

TRADE SECRETS

Mountain States Casing Company, LLC employees are instructed in the confidentiality of trade secret information and the disciplinary action which will be a consequence of violation of confidentiality.

CONTRACTORS

When Mountain States Casing Company, LLC is the contractor*:*

- Mountain States Casing Company, LLC employees will abide by the employer's safety work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over the entrance to the facility.
- Mountain States Casing Company, LLC employees will not perform hot work until a hot work permit is obtained from Mountain States Casing Company, LLC's employer and/or the owner of the host facility or job site. The permit will document that provisions of §1910.252(a) have been met.
- Mountain States Casing Company, LLC will respect the confidentiality of trade secret information when the process safety information is released to them.
- Mountain States Casing Company, LLC will tell the employer of any hazards it found or created in the course of the work.

Mountain States Casing Company, LLC will develop a written procedure for managing contractors that perform maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. Such procedures will not apply to contractors providing incidental services that do not influence process safety, such as janitorial, food and drink, laundry, delivery, or other supply services. Ensure that each contract employee is trained in the work practices necessary to safely perform his or her job.

"As Designated" will ensure each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his or her job and the process and the applicable provisions of the emergency action plan.

EXPLOSIVE ATMOSPHERE SAFETY / RISK MANAGEMENT

Mountain States Casing Company, LLC will ensure that a periodic risk assessment is taken of all operations and procedures involving potentially dangerous substances. Dangerous substances are any substances used or present at work that will, if not properly controlled, cause harm to people as a result of a fire or explosion. Potentially dangerous substances will be identified and control measures put in place to remove or control the risks.

Mountain States Casing Company, LLC will implement a process for hazardous area classification. Specifically, management will identify and classify areas of the workplace where explosive atmospheres may occur and avoid ignition sources (e.g., unprotected equipment) in those areas.

Training will be conducted on an annual basis and whenever procedures materially change for employees that work in potentially explosive atmospheres. Employees will be properly informed about and trained to control or deal with the risks from dangerous substances. Mountain States Casing Company, LLC will ensure that plans and arrangements are in place to deal with accidents, incidents and emergencies involving dangerous substances.

Training Record

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

POLICY

Mountain States Casing Company, LLC is committed to providing a safe and hazard free workplace and has adopted this policy for hazard identification and risk assessment (HIRA) from industry standards and best available practices.

RESPONSIBILITIES

“As Designated” is the assigned Company supervisor responsible for ensuring the following procedures, practices and rules are implemented and enforced. “As Designated” will administrate and review regularly scheduled job hazard assessments/analysis (JHA) of all jobsites and facilities for hazards on a weekly or as needed basis that will also include spot-checks and random inspections.

TRAINING

The Mountain States Casing Company, LLC HIRA program will ensure employees will be trained in the hazard identification process, including the proper use and care of personal protective equipment (PPE). Affected employees will also be trained in the processes utilized to identify hazards and the hierarchies of controls used to control hazards, engineering, administrative and PPE controls.

PROCEDURES

Assessment/inspections will be documented for review by the Company safety committee. Hazard assessments include inspection of the area as well as safe work practices. Hazard assessments will be appropriately documented using the appropriate form found at the end of this section.

Hazards will be assessed and corrected in a timely manner.

Proper information will be collected, organized and reviewed to determine what types of hazards or potential hazards, and who may be exposed to those hazards. This information may include:

- Operating manuals for equipment and machinery
- Previous Incident Investigations or inspection reports
- Safety data sheets (SDS)
- Results of JHA

During an inspection, when a job hazard is identified it is immediately corrected if possible. If the hazard is not immediately correctable, all appropriate employees are notified, and the hazard is clearly identified by signs, barricades, or other warnings. Hazard/risk assessments will be done, at a minimum, before beginning work. In addition, a risk assessment will be conducted whenever changes occur to processes, equipment or facilities.

Mountain States Casing Company, LLC employees and/or subcontractors are actively involved in the hazard identification process and hazards are reviewed with all employees affected by the process.

The hazard identification process is used for routine and non-routine activities as well as new process, changes in operation, products, or services as applicable.

“As Designated” will identify risks and hazards based on hazard assessments and reports. Hazards will be addressed and mitigated. This will be accomplished by dedicated assignment, appropriate documentation of completion, and controls – including mitigations implemented during execution of work.

The Mountain States Casing Company, LLC safety committee will review all hazard assessments to avoid creating new hazards derived from the corrective measures.

What is a Job Hazard?

A job hazard is the potential for harm. In practical terms, a job hazard is often associated with a condition or activity which, if left uncontrolled, can result in an injury or illness. Identifying job hazards and eliminating or controlling them as early as possible will help prevent injuries and illnesses.

JHA (also known as a Job Safety Analysis/JSA)

A JHA is a technique that focuses on job tasks to identify hazards before they occur – including weather hazards and conditions. It focuses on the relationship between the employee, the task, the tools, and the work environment. Ideally, after identifying uncontrolled hazards, steps will be taken to eliminate or reduce them to an acceptable risk level.

A JHA will be conducted daily before each job task is started. The location of the worksite is also noted on the JHA. The name of the supervisor and supervisory approval is also addressed and on the JHA / JSA. Specifically, supervisors are indicated in the JHA / JSA, as well as the requirements for supervisory approval. In addition, the JHA will state the nature of the work activity being performed. The JHA will be developed, reviewed and signed by the work crew, and any visitors to the site. The JHA will be updated (red-lined) based upon additional hazards being discovered and corresponding changes when applicable. The JHA will clearly define individual responsibilities, as well as clearly identify task-specific requirements including employees, equipment/tools, process controls, permits, etc., and are addressed on the JSA.

A specific means of communication will be identified and addressed in the JHA. The company's upper management will conduct a quality review of the JHA on at least a quarterly basis. In addition, employees will receive adequate JHA training.

The Importance of a JHA

Many employees are injured and killed at the workplace every day in the United States. Safety and health add value to business, your job, and your life. Workplace injuries and illnesses can be prevented by looking at workplace operations, establishing proper job procedures, and ensuring that all employees are trained properly. One (1) of the best ways to determine and establish proper work procedures is to conduct a JHA.

The Value of a JHA

Supervisors can use the findings of a JHA to eliminate and prevent hazards in their workplaces. This is likely to result in fewer employee injuries and illnesses; safer, more effective work methods; reduced employees' compensation costs, and increased employee productivity. The assessment also can be a valuable tool for training new employees in the steps required to perform their jobs safely.

For a JHA to be effective, managers and supervisors will demonstrate their commitment to safety and health and follow through to correct any uncontrolled hazards identified. Otherwise, management will lose credibility and employees may hesitate to go to supervisors when dangerous conditions threaten them.

Jobs Appropriate for Hazard Assessment

HIRA will be conducted in our workplace. Each hazard will be evaluated by considering the severity of potential outcomes, the likelihood that an event or exposure will occur, and the number of employees potentially exposed. Hazards with the greatest risks are addressed and prioritized first. Hazards are classified/prioritized and addressed based on the risk associated with the task. Priority will go to the following job types:

- Jobs with the highest injury or illness rates.
- Jobs with the potential to cause severe or disabling injuries or illness, even if there is no history of previous accidents.
- Jobs in which one (1) simple human error will lead to a severe accident or injury.
- New jobs or ones with changes in processes and procedures.
- Jobs complex enough to require written instructions.

Where to Begin

Involve employees and subcontractors. It is very important to involve employees and subcontractors in the hazard assessment process. They have a unique understanding of the job, and this knowledge is invaluable for finding hazards. Involving employees will help minimize oversights, ensure a quality assessment, and get employees to “buy in” to the solutions because they will share ownership in their safety and health program.

Review accident history. Review with employees our workplace’s history of accidents and occupational illnesses that needed treatment, losses that required repair or replacement, and any “near misses” – events in which an accident or loss did not occur but will have. These events are indicators that the existing hazard controls (if any) may not be adequate and deserve more scrutiny.

Conduct a preliminary job review. Discuss with employees and subcontractors the hazards they know exist in their current work and surroundings. Brainstorm with them for ideas to eliminate or control those hazards.

If any hazards exist that pose an immediate danger to an employee’s life or health, take immediate action to protect the employee. Any problems that can be corrected easily will be corrected as soon as possible. Do not wait to complete your JHA. This demonstrates our commitment to safety and health and enable us to focus on the hazards and jobs that need more study because of their complexity. For those hazards determined to present unacceptable risks, evaluate types of hazard controls.

List, rank and set priorities for hazardous jobs. List jobs with hazards that present unacceptable risks, based on those most likely to occur, and with the most severe consequences. These jobs are first priority for assessment.

Planned Job Steps

The Company's tailboard and JHA/JSA program will ensure that all employees will have a thorough understanding of the potential risks associated with various tasks.

All planned job steps will be explicitly incorporated, clearly detailing each phase of the work process on the Tailboard and /or Job Safety Analysis (JSA) document. To aid in the identification of hazards and facilitate the implementation of appropriate safety measures tailored to each specific task. This comprehensive approach ensures that employees are well-informed about the necessary precautions and procedures, ultimately fostering a safer work environment.

To facilitate ease of transition amongst employees during changes in job procedures and conditions, regular reviews and updates of the Tailboard and /or JSA will be implemented to reinforce the company’s commitment to safety and risk management.

Identifying Workplace Hazards

The Company will ensure that the tailboard and /or JSA/JHA program will comprehensively identify and address potential hazards that may arise in the workplace. It will be ensured to involve a thorough examination of all tasks and processes to pinpoint any risks that may pose a threat to

employee safety. By systematically evaluating each job function, the program can establish preventive measures and safety protocols tailored to mitigate these identified hazards.

Regular training and updates will be incorporated to the JHA/JSA, to ensure that employees are well-informed about the risks associated with their work and the best practices for maintaining a safe environment. This approach will protect employees and foster a culture of safety within the organization, ultimately contributing to enhanced productivity and reduced incidents of workplace injuries.

A JHA is an exercise in detective work. The goal is to discover the following: What can go wrong; the consequences; how it will arise; contributing factors; likelihood that it will occur. To prevent future occurrences, the root cause of the hazard needs to be investigated and identified. Workplace incidents include:

- Injuries
- Illnesses
- Near misses
- Stop work interventions

To make our JHA useful, document the answers to these questions in a consistent manner. Describing a hazard in this way helps to ensure that our efforts to eliminate the hazard and implement hazard controls help target the most important contributors to the hazard.

Good hazard scenarios describe:

- Where is it happening? (environment)
- Who or what it is happening to? (exposure)
- What precipitates the hazard? (trigger)
- The outcome that would occur will it happen? (consequence)
- Any other contributing factors

Rarely is a hazard a simple case of one (1) singular cause resulting in one (1) singular effect. More frequently, many contributing factors tend to line up in a certain way to create the hazard.

Here is an example of a hazard scenario:

In the metal shop (environment), while clearing a snag (trigger), an employee’s hand (exposure) comes into contact with a rotating pulley. It pulls his hand into the machine and quickly severs his fingers (consequences).

To perform a JHA, you would ask:

- What can go wrong? The employee’s hand will come into contact with a rotating object that “catches” it and pulls it into the machine.
- What are the consequences? The employee will receive a severe injury and lose fingers and hands.
- How will it happen? The accident will happen as a result of the employee trying to clear a snag during operations or as part of a maintenance activity while the pulley is operating. Obviously, this hazard scenario will not occur if the pulley is not rotating.
- What are other contributing factors? This hazard occurs very quickly. It does not give the employee much opportunity to recover or prevent it once his hand comes into contact with the pulley. This is an important factor, because it helps determine the severity and likelihood of an accident when selecting appropriate hazard controls. Unfortunately, experience has shown that training is not very effective in hazard control when triggering events happen quickly because humans can react only so quickly.

How to Correct or Prevent Hazards

After reviewing the list of hazards with the employee, consider what control methods will eliminate or reduce them. The most effective controls are engineering controls that physically change a machine or work environment to prevent employee exposure to the hazard. The more reliable or less likely a hazard control can be circumvented, the better. If this is not feasible, administrative controls may be appropriate.

This may involve changing how employees do their jobs. Discuss recommendations with all employees who perform the job and consider their responses carefully. If it is planned to introduce new or modified job procedures, be sure they understand what they are required to do and the reasons for the changes.

Before Starting a JHA

The job procedures discussed are for illustration only and do not necessarily include all the steps, hazards, and protections that apply. When conducting a JHA, be sure to consult Occupational Safety and Health Administration (OSHA) standards. Compliance with these standards is mandatory, and by incorporating their requirements into the JHA, we can be sure that our safety and health program meets Federal standards.

Review the JHA

Periodically reviewing the JHA ensures that it remains current and continues to help reduce workplace accidents and injuries. Even if the job has not changed, it is possible that during the review process you will identify hazards that were not identified in the initial assessment. It is particularly important to review the JHA if an illness or injury occurs on a specific job.

Based on the circumstances, it may be determined that changes are needed in the job procedure to prevent similar incidents in the future. If an employee’s failure to follow proper job procedures results in a “close call or near miss,” discuss the situation with all employees who perform the job and remind them of proper procedures. Any time a JHA is revised, it is important to train all employees affected by the changes in the new job methods, procedures, or protective measures adopted.

When to Hire a Professional

If our employees are involved in many different or complex processes, we may need professional help conducting a JHA. Even if we receive outside help, it is important that our employees remain involved in the process of identifying and correcting hazards because they are at the workplace every day and most likely to encounter these hazards. New circumstances and a recombination of existing circumstances may cause old hazards to reappear and new hazards to appear. In addition, we, and our employees will be ready and able to implement whatever hazard elimination or control measures a professional consultant recommends.

Hazard Control Measures

Information obtained from a JHA is useless unless hazard control measures recommended in the assessment are incorporated into the tasks. Managers and supervisors will recognize that not all hazard controls are equal. Some are more effective than others at reducing the risk.

The order of precedence and effectiveness of hazard control are the following: Engineering controls; administrative controls; and PPE.

Engineering controls include the following:

- Elimination/minimization of the hazard – designing the facility, equipment, or process to remove the hazard, or substituting processes, equipment, materials, or other factors to lessen the hazard.
- Enclosure of the hazard using enclosed cabs, enclosures for noisy equipment, or other means.
- Isolation of the hazard with interlocks, machine guards, blast shields, welding curtains, or other means.
- Removal or redirection of the hazard such as with local and exhaust ventilation.

Administrative controls include the following:

- Written operating procedures, work permits and safe work practices
- Developing and implementing a continuous improvement process for lessons learned
- Exposure time limitations (mostly used to control temperature extremes and ergonomic hazards)
- Monitoring the use of highly hazardous materials
- Alarms, signs and warnings
- The “buddy” system
- Training

Emergency Procedures

Emergency procedures will be clearly defined on the JHA for the task, such as nearest hospital with directors, first aid employees, drivers of vehicles to transport injured, doctor and phone numbers for ambulance, police, fire, etc. Also, emergency procedures for work site preparations for egress and muster points will be clearly defined on the JSA for the task.

PPE

Protective equipment such as respirators, hearing protection, protective clothing, safety glasses, and hardhats are acceptable as a control method in the following circumstances:

- When engineering controls are not feasible or do not eliminate the hazard
- While engineering controls are being developed
- When safe work practices do not provide sufficient additional protection
- During emergencies when engineering controls may not be feasible

Use of one (1) hazard control method over another higher in the control precedence may be appropriate for providing interim protection until the hazard is abated permanently. In reality, if the hazard cannot be eliminated entirely, the adopted control measures will likely be a combination of all three (3) items instituted simultaneously.

MULTI-EMPLOYER WORKPLACES / SIMULTANEOUS OPERATIONS (SIMOPS)

Mountain States Casing Company, LLC will perform evaluations of hazards from others in the work area – this does not include subcontractors that are working for/with Mountain States Casing Company, LLC but work by others that the company will have a potential exposure from, including the following:

- Identifying the additional hazards introduced by the SIMOPS.
- Assessing the relevant levels of risk.
- Verifying the adequacy of the planned control measures.
- Identifying additional risk-reduction measures.
- Providing input to processes for embedding additional controls (e.g., permit-to-work).

Mountain States Casing Company, LLC will also use the following methods when working multi-employer worksites or employees are on multiple worksites where hazardous chemicals are produced, used, or stored:

- On-site access to SDS for each hazardous chemical that other employer(s)' employees may be exposed to.
- Inform other employer(s) of any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies.
- Inform other employer(s) of the labeling systems used in the workplace.

A copy of the written hazard communication program is available to employees, their designated representatives, the assistant secretary, or the director upon request, in accordance with the requirements of 29 CFR 1910.1020 (e).

Where employees will travel between workplaces during a work shift (i.e., their work is carried out at more than one (1) geographical location), the written hazard communication program may be kept at the primary workplace facility. If there is no primary site, the program will be sent with employees.

Mountain States Casing Company, LLC will use the forms on the following pages for the HIRA program.

Job Hazard Alert

Department:	Date:
Location:	
Person who discovered hazard:	
Description of Hazard	
Supervisor Actions	
Root Cause(s)	
Control(s)	
Reviewed By:	Date Corrected:

Job Hazard Assessment/Analysis (JHA)

Job Title		Job Location
Task #	Person Doing Assessment	Date
Task Description		
Hazard Type		
Hazard Description		
Consequence		
Hazard Control		
Rational or Comment		
Supervisor Signature		Date

Hazard Tracking Log

Hazard Number	Description	Reported by	Date Reported	Corrected by	Responsible Supervisor	Date Corrected

Job Hazard Assessment/Analysis (JHA) (Page 1 of 2)

Mountain States Casing Company, LLC uses this program of self-inspection for our facilities and workplaces to identify hazards and assess risk. Self-inspection is essential if we are to know where probable hazards exist and whether they are under control. Safety inspection items are completed using the following self-inspection form. These checklists are designed to assist in this fact-finding. It will give the Company some indication of where we can take action to make our business safer and more beneficial for all our employees. Use sections on the checklist relevant to particular operations and disregard those which do not apply.

When a checklist has been completed, this material will be added to our injury information, our employee information, and to our process and equipment information. The Company will now possess many facts that will help determine what problems exist. Management will then use the OSHA standards in the problem-solving process, and it will be much easier to determine the action needed to solve these problems. Corrective action is required to be documented on the form at the end of this section. Corrective action or preventive action plans will be reviewed by management at safety committee meetings. The scope of our self-inspections will include the following:

- Processing, receiving, shipping and storage – equipment, job planning, layout, heights, floor loads, projection of materials, materials-handling and storage methods, and training for material handling equipment
- Building and grounds conditions – floors, walls, ceilings, exits, stairs, walkways, ramps, platforms, driveways and aisles
- Housekeeping program – waste disposal, tools, objects, materials, leakage and spillage, cleaning methods, schedules, work areas, remote areas and storage areas
- Electricity – equipment, switches, breakers, fuses, switchboxes, junctions, special fixtures, circuits, insulation, extensions, tools, motors, grounding and National Electrical Code (NEC) compliance
- Lighting – type, intensity, controls, conditions, diffusion and location
- Heating and ventilation – type, effectiveness, temperature, humidity, controls, and natural and artificial ventilation and exhaust
- Machinery – points of operation, flywheels, gears, shafts, pulleys, keyways, belts, couplings, sprockets, chains, frames, controls, lighting for tools and equipment, brakes, exhausting, feeding, oiling, adjusting, maintenance, lockout/tagout, grounding, workspace, location and purchasing standards
- Employee – experience training, hazard identification training; methods of checking machines before use; type of clothing; personal protective equipment; use of guards; tool storage; work practices; and methods of cleaning, oiling, or adjusting machinery
- Hand and power tools – purchasing standards, inspection, storage, repair, types, maintenance, grounding, use and handling
- Chemicals – storage, handling, transportation, spills, disposals, amounts used, labeling, toxicity or other harmful effects, warning signs, supervision, training, protective clothing and equipment, and hazard communication requirements
- Fire prevention – extinguishers, alarms, sprinklers, smoking rules, exits, employee assigned, separation of flammable materials and dangerous operations, explosive-proof fixtures in hazardous locations, and waste disposal

Job Hazard Assessment/Analysis (JHA) (Page 2 of 2)

- Maintenance, including tracking and abatement of preventive and regular maintenance – regularity, effectiveness, training of employee, materials and equipment used, records maintained, method of locking out machinery and general methods.
- Personal Protective Equipment (PPE) – type, size, maintenance, repair, storage, assignment of responsibility, purchasing methods, standards observed, training in care and use, rules of use and method of assignment
- Transportation – motor vehicle safety, seat belts, vehicle maintenance and safe driver programs
- Review – evacuation routes, equipment and PPE

Job Safety Inspection and Report

Company			Date	Time
Job Site Location		Job Foreman/Supervisor		
Person(s) Making Inspection		Subcontractors On-Site		

An Adequate at Time of Inspection	**B** Needs Consideration	**C** Needs Immediate Attention	**N** Not Applicable

Jobsite Information	A	B	C	N	Action Taken
Copy of Company safety program on site?	☐	☐	☐	☐	
OSHA 300 and 301 Forms Posted and Complete?	☐	☐	☐	☐	
Are required OSHA posters posted?	☐	☐	☐	☐	
Phone number to nearest medical center posted?	☐	☐	☐	☐	
Tailgate/Toolbox training current?	☐	☐	☐	☐	
HAZCOM and safety data sheets (SDS) on site?	☐	☐	☐	☐	
Work areas properly signed and barricaded?	☐	☐	☐	☐	
Housekeeping	A	B	C	N	Action Taken
Work area generally neat?	☐	☐	☐	☐	
Projecting nails removed or bent over?	☐	☐	☐	☐	
Waste containers in use?	☐	☐	☐	☐	
Designated disposal area in place?	☐	☐	☐	☐	
Passageways/walkways clear?	☐	☐	☐	☐	
Cords, leads, and trip hazards off the floor?	☐	☐	☐	☐	
Fire Prevention	A	B	C	N	Action Taken
Charged and inspected fire extinguishers accessible?	☐	☐	☐	☐	
Phone number of local fire department posted?	☐	☐	☐	☐	
Flammables properly stored?	☐	☐	☐	☐	
“No Smoking” signs posted near flammables?	☐	☐	☐	☐	
Electrical	A	B	C	N	Action Taken
Damaged extension cords removed from service?	☐	☐	☐	☐	
Ground fault circuit interrupters used?	☐	☐	☐	☐	
Terminal boxes equipped with required covers?	☐	☐	☐	☐	
Employees trained in lockout\tagout?	☐	☐	☐	☐	
Hand, Power, Powder Tools	A	B	C	N	Action Taken
Hand tools inspected regularly?	☐	☐	☐	☐	
Guards in place on machines?	☐	☐	☐	☐	
Tools suited for their jobs?	☐	☐	☐	☐	
Operators of powder-actuated tools licensed?	☐	☐	☐	☐	
Materials Handling	A	B	C	N	Action Taken
Materials properly stored or stacked?	☐	☐	☐	☐	
Employees using proper lifting methods?	☐	☐	☐	☐	
Tag lines used to guide loads?	☐	☐	☐	☐	
Proper number of employees for each operation?	☐	☐	☐	☐	

Fall Protection	A	B	C	N	Action Taken
Employees properly trained?	☐	☐	☐	☐	
Safety rails and cables secured properly?	☐	☐	☐	☐	
Guardrails properly installed and secured?	☐	☐	☐	☐	
Employees have D- ring belts in center of back?	☐	☐	☐	☐	
Employees exposed to fall hazards tied off?	☐	☐	☐	☐	
Employees below protected from falling objects?	☐	☐	☐	☐	
Ladders	A	B	C	N	Action Taken
Ladders extend 36 inches above the landing?	☐	☐	☐	☐	
Ladders secured to prevent slipping or sliding?	☐	☐	☐	☐	
Damaged ladders removed from service?	☐	☐	☐	☐	
Stepladders used in fully open position?	☐	☐	☐	☐	
No stepping on top two (2) rungs of stepladder?	☐	☐	☐	☐	
Scaffold	A	B	C	N	Action Taken
All scaffolding inspected daily?	☐	☐	☐	☐	
Erected on solid, stable footing?	☐	☐	☐	☐	
Tied-off to structure as required?	☐	☐	☐	☐	
Guardrails, mid-rails, and toe boards in place?	☐	☐	☐	☐	
Is scaffold properly planked?	☐	☐	☐	☐	
Is working level of scaffold fully planked?	☐	☐	☐	☐	
Proper access provided?	☐	☐	☐	☐	
Employees below protected from falling objects?	☐	☐	☐	☐	
Floor and Wall Openings	A	B	C	N	Action Taken
All floor and deck openings covered or barricaded?	☐	☐	☐	☐	
Perimeter protection in place?	☐	☐	☐	☐	
Deck planks secured?	☐	☐	☐	☐	
Materials stored away from edge?	☐	☐	☐	☐	
Guardrails in place?	☐	☐	☐	☐	
Trenches, Excavations and Shoring	A	B	C	N	Action Taken
Competent person on hand?	☐	☐	☐	☐	
Employees properly trained?	☐	☐	☐	☐	
No water in excavation or signs of cave-in?	☐	☐	☐	☐	
Excavations shored or sloped back?	☐	☐	☐	☐	
Materials stored at least two (2) ft. from trench?	☐	☐	☐	☐	
Excavations properly identified and barricaded?	☐	☐	☐	☐	
Ladders provided every 25 ft. in trench?	☐	☐	☐	☐	
Is equipment a safe distance from edge of trench?	☐	☐	☐	☐	
Forklifts and Other Equipment	A	B	C	N	Action Taken
Pre-use inspections of forklifts and powered equipment documented and up to date?	☐	☐	☐	☐	
Operators certified and authorized to use the specific equipment on site?	☐	☐	☐	☐	
Safety devices (e.g., horns, lights, backup alarms) functioning properly?	☐	☐	☐	☐	
Equipment operated within designated travel paths and speed limits?	☐	☐	☐	☐	
Loads properly secured and within the rated capacity?	☐	☐	☐	☐	

Welding and Burning	A	B	C	N	Action Taken
Gas cylinders stored correctly?	☐	☐	☐	☐	
Proper separation between fuels and oxygen?	☐	☐	☐	☐	
Burning/welding goggles or shields used?	☐	☐	☐	☐	
Other required PPE being used?	☐	☐	☐	☐	
Fire extinguishers in close proximity?	☐	☐	☐	☐	
Hoses in good condition?	☐	☐	☐	☐	
Employees properly trained?	☐	☐	☐	☐	
Cranes	A	B	C	N	Action Taken
Operator's certification verified and documented?	☐	☐	☐	☐	
Daily crane inspections completed and recorded?	☐	☐	☐	☐	
Lift plan reviewed and approved for critical or complex lifts?	☐	☐	☐	☐	
Rigging components inspected and tagged?	☐	☐	☐	☐	
Swing radius barricaded and the load path clear of personnel?	☐	☐	☐	☐	
Concrete Construction	A	B	C	N	Action Taken
Exposed rebar properly capped or covered?	☐	☐	☐	☐	
Employees protected from cement dust and silica?	☐	☐	☐	☐	
Exposed skin covered?	☐	☐	☐	☐	
Runways adequate?	☐	☐	☐	☐	
Personal Protective Equipment	A	B	C	N	Action Taken
Fall protection inspected and used correctly?	☐	☐	☐	☐	
Hard hats being worn?	☐	☐	☐	☐	
Safety glasses/goggles being worn?	☐	☐	☐	☐	
Hearing protection being worn when required?	☐	☐	☐	☐	
Boots and long pants worn on jobsite?	☐	☐	☐	☐	
Long hair tied back?	☐	☐	☐	☐	
Traffic vests being worn?	☐	☐	☐	☐	
Respirators used when required? (Medical evaluations and fit testing completed)	☐	☐	☐	☐	
Other	A	B	C	N	Action Taken
	☐	☐	☐	☐	
	☐	☐	☐	☐	
Unsafe Acts or Practices Observed:					
Comments					
Evaluator's Signature:			Date:		
Evaluator's Signature:			Date:		

File this document in the "Company Safety and Health File."

Training Record

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

POLICY

Mountain States Casing Company, LLC has adopted this policy to inform employees of the stop work authority (SWA). This ensures the safety and health of the employees.

RESPONSIBILITIES

“As Designated” is responsible for ensuring that the following policy is enforced.

ROLES AND RESPONSIBILITIES

Management

- Creates a culture that promotes SWA.
- Establishes clear expectations and responsibilities.
- Demonstrates support for using SWA without the potential for retribution.
- Resolves SWA conflicts when they arise.
- Holds employees and contractors accountable for full compliance with the SWA program.

Supervisors and Managers

- Promotes a culture where SWA is freely exercised.
- SWA requests are honored and resolved before resuming operations.
- Ensures necessary stop work follow-up is completed.

Health, Safety and Environment Department

- Provides training and support for the SWA program.
- Documents and monitor compliance with the SWA program.

Employees

- Initiates stop work (in good faith).
- Supports stop work initiated by others.

TRAINING

Mountain States Casing Company, LLC will ensure that employees will receive SWA training before the initial assignment. The training will be documented, including the employee’s name, the dates of training and subject.

PROCEDURES

All contractors and employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of hazards or unsafe acts.

It is the policy of Mountain States Casing Company, LLC that no work will resume until all stop work issues and concerns have been adequately addressed.

Stop Work Intervention

Mountain States Casing Company, LLC ensures that employees will not be reprimanded for issuing a stop work intervention.

Any form of retribution, reprimand or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated by Mountain States Casing Company, LLC.

All employees of Mountain States Casing Company, LLC are responsible to initiate a stop work intervention when warranted and management is responsible to create a culture where SWA is exercised freely.

Stop Work Authority Steps

The steps to a stop work authority for Mountain States Casing Company, LLC include stop, notify, correct and resume.

When an unsafe condition is identified, the SWA (also known as a stop work intervention), will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected employee and supervision of the stop work issue, correct the issue and resume work when it is safe to do so.

NOTE: No work can resume once a SWA is exercised until all issues and concerns have been addressed.

Documentation

It is the policy of Mountain States Casing Company, LLC that all stop work interventions will be documented for lessons learned and corrective measures to be put in place.

Stop Work Reports

Mountain States Casing Company, LLC ensures that stop work reports will be reviewed by the supervisor in order to:

- Measure participation
- Determine the quality of interventions and corrective actions
- Trend common issues
- Identify opportunities for improvement
- Establish lessons learned

Follow Up Importance

It is of high importance for Mountain States Casing Company, LLC to conduct a follow-up after a stop work intervention has been initiated and closed.

It is the desired outcome of any stop work intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved persons before the resumption of work. Most issues can be resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.

RECORD OF EMPLOYEE TRAINING

Employees have been made aware of the procedure for stop work intervention and have been trained in the appropriate actions as defined in the procedures of this program. The following is a list of employees who have received training on SWA procedures.

Topics in this training include identification, SWA, resumption of work, reports review, roles and responsibilities, stop work intervention steps, documentation and follow-up.

Printed Name	Signature	Date

This space is intentionally left blank for printing purposes

DISCLAIMER

Your Success is Our Priority

We are committed to simplifying compliance, making safety effortless, and exceeding your expectations — all with a genuine love for your people and their success. This manual has been carefully crafted to serve as a comprehensive guide to help your organization foster a safer, more compliant workplace.

However, because every work environment is unique, this manual is intended to provide general guidance and may require additional customization to align with your specific operational needs, local regulations, and industry standards. We encourage you to review and adapt these materials in collaboration with your internal safety leadership and, where necessary, consult legal or regulatory experts.

SSC is always available to assist with personalized support, including custom manual development and site-specific compliance consultations. Our team is here to help you maximize the effectiveness of your safety and compliance efforts.

Important Legal Notice:

At SSC, we believe in empowering your success by providing trusted, reliable resources. Please note that this manual is offered based on information you provided during your purchase and is not a replacement for professional legal or regulatory advice that may be required for your specific job site and/or circumstances disclosed or undisclosed to Safety Services Company at the time of purchase. Because safety regulations and operational environments continually evolve, we recommend combining the efforts of a qualified job site expert with our customization team to ensure full compliance with all applicable laws.

While we are proud to partner with you on your compliance journey, SSC is not liable for actions taken solely based on this manual. Ultimate responsibility for compliance rests with your organization, which is why we encourage you to regularly validate that your safety practices match these policies and procedures.

Need Help Customizing Your Manual?
Contact your SSC Client Success Manager or call us at (866) 204-4786.

Together, we can build a workplace where safety and success go hand in hand.

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