HIERARCHY OF CONTROLS

Integrated Water Services, Inc.
(the Company)

INTEGRATED WATER SERVICES

Purpose

The purpose of this program is to establish the requirements for applying the Hierarchy of Controls in hazard identification and mitigation to ensure the safety and health of employees. This procedure outlines the step-by-step priority order for eliminating or controlling workplace hazards, in accordance with OSHA guidance.

Scope

This policy applies to all work activities conducted on Integrated Water Services (IWS) property or performed by IWS employees, including construction, operations, and maintenance activities. When work is performed by a subcontractor on a company site, the contractor's written safety program shall take precedence for their employees. However, subcontractors may adopt this procedure for their use.

Key Responsibilities

Supervisors

- Shall ensure the Hierarchy of Controls is applied to all hazard assessments and job planning activities.
- Shall verify that hazard controls selected follow the priority sequence outlined in this procedure, starting with elimination and ending with personal protective equipment (PPE).
- Shall document control measures in Job Hazard Analyses (JHAs), Safe Work Permits, or other required safety documentation.

Employees

- Shall follow all aspects of this program and actively participate in hazard identification and control selection.
- Shall promptly report hazards to their supervisor and suggest higher-level control measures where feasible.

Procedure

The Hierarchy of Controls shall be applied in the following priority order:

1. **Elimination**
   - Physically remove the hazard from the workplace.
   - Examples: Remove defective equipment from service, eliminate the need to work at heights by relocating work to the ground, design out confined space requirements.
2. **Substitution**
   - Replace the hazard with a less hazardous process, material, or equipment.
   - Examples: Use less toxic chemicals, swap noisy equipment with quieter alternatives, replace sharp-edged tools with safer designs.
3. **Engineering Controls**
   - Isolate people from the hazard using physical means.
   - Examples: Guardrails, machine guards, ventilation systems, soundproof enclosures, interlocks.
4. **Administrative Controls**
   - Change the way work is performed to reduce exposure to hazards.

- Examples: Rotating job assignments, implementing safe work procedures, posting warning signs, providing safety training, limiting time in high-exposure areas.

5. **Personal Protective Equipment (PPE)**
    - Provide and require the use of protective equipment when hazards cannot be eliminated or controlled by other means.
    - Examples: Hard hats, safety glasses, respirators, gloves, high-visibility vests, fall protection harnesses.

General Requirements

- Higher-level controls (Elimination, Substitution, Engineering) must be considered and implemented before relying on lower-level controls (Administrative, PPE).
- Where multiple hazards are present, the Hierarchy of Controls must be applied to each hazard individually.
- Controls must be periodically reviewed for effectiveness and adjusted as necessary.
- All employees shall be trained in the principles and application of the Hierarchy of Controls. Training must conform to all applicable OSHA requirements.