



Trinity Energy, LLC

Shreveport, LA

Safety and Health Manual  
For  
Supervisors, Employees, and Subcontractors

## **Trinity Energy Services, LLC Safety and Health Manual Receipt**

To: All Trinity Energy Services, LLC Employees

After reading the Trinity Energy Services, LLC HSSE Manual, if you have any questions, ask any Supervisor or member of Management for clarification. After all questions have been answered, sign this page and return to Human Resources. (A copy of this form may be requested for your records.)

This is to certify that I have received a copy of the Safety and Health Manual.

I have read these instructions, understand them, and will comply with them while working for Trinity Energy Services, LLC.

I understand that failure to abide by these rules may result in disciplinary action and possible termination of my employment with Trinity Energy Services, LLC.

I understand that working safely is the key to efficient production, my personal safety and the safety of my coworkers.

I will bring to the attention of my Supervisor or member of Management any safety concern I may have immediately.

I understand that as a Trinity Energy Services, LLC employee I have the following “Safety Rights”:

- I am not required to work in any area that I do not feel safe.
- I am entitled to information on any hazardous material or chemicals I may be exposed to while working.
- I am entitled to see a copy of the company Safety and Health Manual.
- I will not be discriminated against for reporting safety concerns.

\_\_\_\_\_  
Employee Name (Signature)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Name (Printed)

\_\_\_\_\_  
Supervisor Name (Signature)

\_\_\_\_\_  
Date

Brian Barker  
\_\_\_\_\_  
Supervisor Name (Printed)

# TABLE OF CONTENTS

Safety and Health Policy Statement.....	1/pg. 4
Health and Safety Training .....	1/pg. 5
General Safety Rules .....	1/pgs. 6-9
Drug, Alcohol, and Weapons (Substance Abuse Program) .....	1/pgs. 10-11
Subcontractor Guidelines and Procedures .....	1/pgs. 12-15
Record keeping.....	1/pgs. 16-18
Incident Procedures/Emergency Response .....	1/pgs. 19-26
Accident/Incident Reporting and Investigation.....	1/pgs. 27-28
Restricted Duty/Case Management.....	1/pgs. 29-33
Job Safety Analysis (JSA).....	1/pg. 34-35
Environmental Responsibilities and Training.....	1/pg. 36-37
Short Service Employee.....	1/pgs. 38-40
Stop Work Authority .....	1/pgs. 41-43

## Health and Safety Policy Statement

Trinity Energy Services, LLC will strive to provide a safe work environment for all of its employees, subcontractors, and clients. Safe working conditions are achieved through efficient communication, thorough hazards analysis, and continuous training. In addition, Trinity Energy Services, LLC will adhere to all regulatory requirements (state, federal, and local), and where these regulations are insufficient, will work to maintain best-industry practices.

Trinity Energy Services, LLC believes that all injuries are preventable; therefore, we will continually strive to prevent injuries from occurring. Management also recognizes that every employee shares in the responsibility for safety on the job; consequently, safe work practices and timely reporting of incidents and potential accidents, near misses, and unsafe conditions are a condition of employment.

Everyone is encouraged to provide suggestions and establish high personal goals for eliminating accidents and injuries. Participation in the meetings to discuss the safety aspects of each assignment is mandatory. If the source of a hazard cannot be eliminated, the use of special procedures, safety devices, or protective equipment and clothing must be utilized to reduce the exposure potential; if these measures cannot sufficiently reduce the potential for harm, then the job will not be performed.

Trinity Energy Services, LLC will take a proactive approach to conducting the safety and health program. Incidents and near misses will be investigated, and the pertinent information that is uncovered during the investigation will be distributed or discussed during the following safety meeting. Please refer to the Accident Investigation section for further detail.

As an employee of this company you have the right to discuss any safety concerns with myself or any member of management without fear of retaliation or discrimination. Please feel free to contact me at any time should any concerns arise.

\_\_\_\_\_  
Bart Little  
President

\_\_\_\_\_  
Employee Name (Signature)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Name (Printed)

\_\_\_\_\_  
Supervisor Name (Signature)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Brian Barker  
Supervisor Name (Printed)

## **Health and Safety Training**

Training employees is a means for taking a proactive approach to safety in the workplace. The goal is to train employees on issues that may prevent or eliminate incidents from occurring. When employees take this knowledge and couple it with safety behaviors, the result is a safe work environment.

Company-wide safety training will be held on a regular basis. While Job Safety Analyses are considered jobsite hazard assessments, they are also considered training. JSAs are conducted daily or as the tasks change. A training schedule will be developed to comply with state and federal regulations. Listed below are some examples of subjects that will be trained upon annually:

- Hazard Communication
- Personal Protective Equipment
- Fire Safety; Protection and Prevention
- Blood borne Pathogens
- First Aid/CPR
- Proper Lifting Techniques/Manual Lifting
- Electrical Safety
- Office Safety
- Continuing Driving Safety Awareness Classes and Vehicle Safety
- Emergency Procedures to include Hazardous Materials
- Substance Abuse
- Lockout/Tagout
- Fall protection
- Hazardous Materials
- Respiratory Protection
- Hydrogen Sulfide
- Hearing Conservation
- 

As the need arises, additional topics will be added to the list. In addition, job-specific training will be provided whenever applicable.

If a property incident, injury or near-miss occurs on a company job site, then the root cause or determining factor in the incident will be addressed at the next safety meeting or sooner if necessary.

Training classes shall be long enough to ensure employee comprehension. In addition, short quizzes will be given periodically to test employees' retention of the material.

***Safety Training Attendance Is Mandatory!***

## **General Safety Rules**

**Note:** Many of the topics addressed briefly in this section are discussed in more depth within the manual. These rules apply to all Trinity Energy Services, LLC employees, including managers, supervisors, visitors, subcontractors, and client personnel.

1. Each employee is required to adhere to the safety rules listed in this manual in order to fulfill their responsibility to the safety program. This means that no one is to work in an unsafe situation or condition, and if an unsafe situation or condition exists, then this must be reported to supervisor or management and corrected immediately. **If this includes shutting the job down, then job shut down is permissible. Employee safety is the main goal of Trinity Energy Services, LLC's and all of its employees.**
2. **Failure to abide by these General Safety rules or the policies contained in this manual may result in disciplinary actions up to and including termination.**
3. **The illegal use, possession, transportation, or sale of drugs, alcoholic beverages, firearms, deadly weapons, or explosives while on Trinity Energy Services, LLC or client property is prohibited. (Dangerous weapons include, but not limited to:**
4. **Firearms of any type, Archery, Explosives, Knives with blades greater than 4 inches, Armament systems and Procedures batons, Electroshock Tasers or stun guns, Martial arts instruments and Chemical agents.)**
5. **Trinity Energy Services, LLC reserves the right to conduct reasonable searches or inspections of people or property at any time, at its discretion, and with or without notice. Such searches may include personal effects and vehicles if they are on or in Trinity Energy Services, LLC property, jobsites or client property and jobsites.**
6. No one shall 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 intoxicating substances, impaired by fatigue or an illness, shall be prohibited from working on Trinity Energy Services, LLC jobsites.
7. The use of prescribed drugs or any over-the-counter drug that might impair your ability to work safely must be reported to your supervisor before work. Persons with symptoms of alcohol and/or drug abuse are encouraged to discuss personal or work related problems with the supervisor/employer.
8. Communication in all aspects is highly important. If you do not understand any directive or procedure, address with your supervisor. Relay all occurrences that have an effect on safety to supervisors whether you think the occurrence is important or not. Always adhere to the highest safety standards.
9. All work-related injuries or illnesses must be reported immediately. This includes first aid (minor injury) incidents. "Immediately" is defined as within 15 minutes of the incident.

10. Any vehicle- and/or equipment-related incident must be reported immediately.
11. Any injury that occurred off the job and could result in lost work time must be reported to a supervisor as soon as possible, and no later than two hours prior to the next work shift.
12. All near-misses must be reported to the supervisor before the end of the shift in which they occurred; near-misses will be documented on a Near miss report. Near-misses will be discussed with all employees during the next safety meeting.
13. Attempts shall always be made to eliminate possibilities of environmental damage. Releases and spills shall be reported immediately and remediate according to the MSDS recommendations. All wastes shall be disposed of properly in approved waste disposal sites/reclamation centers.
14. Trinity Energy Services, LLC employees will follow all client rules and policy recommendations. When there is an absence of these rules, Trinity Energy Services, LLC will set the high safety standard and inform management of this lack of safety initiatives
15. Horseplay, wrestling, or fighting is not permitted at any location at any time as these acts tend to have an adverse effect on safety in the workplace.
16. All persons operating a moving vehicle for Trinity Energy Services, LLC in any capacity will wear seat belts.
17. Never run on the job unless there is an emergency.
18. Equipment, materials, and work areas shall be maintained in such a fashion as to minimize hazards. In other words, maintain clean work areas and equipment.
19. Avoid skin contact with all chemicals, beware of other means of bodily entry, and take the proper precautions.
20. The proper personal protective equipment shall be worn at all times. Trinity Energy Services, LLC requires the use of PPE.
21. Riding in the bed of trucks or in other non-approved areas is prohibited. 'Non-approved areas include areas that are not protected by a seatbelt.
22. Use the three-point contact procedure when getting on or off of any equipment. Do not jump off equipment unless following emergency evacuation procedures involved with power line strikes.
23. Do not walk on pipe or any other non-approved walking/working surface.
24. Smoking is allowed only in designated areas. Smokers are not allowed to take smoking

materials into non-designated areas.

25. Whenever a safety device is removed from service and/or defeated, the appropriate supervisor shall be notified, the device tagged, and the action properly documented. If equipment is still operating, restrict entry and monitor continuously. Document all actions.
26. No work may be started in any area or on any equipment without the knowledge and consent of the appropriate supervisor/client representative. Never operate equipment that you are not trained, certified and authorized to operate,
27. Job Safety Analyses are to be conducted before each day's tasks begin or as major work scope changes. All persons affected by the work will attend the JSA meetings. If workers show up after the meeting has been conducted, then he must be briefed as to the JSA findings and the Supervisor is responsible for this safety briefing.
28. Operation of equipment having a, "DANGER! DO NOT OPERATE." tag is prohibited.
29. All energy will be controlled through appropriate Lockout/Tagout procedures.
30. Do not attempt to do a job alone that takes at least two people to do correctly. The Supervisor will periodically check on persons working alone. All persons working in remote areas must have a form of communication to summon emergency services if needed.
31. Finger rings, loose clothing, unsecured long hair, wristwatches, and other loose accessories should not be worn when within arm's reach of any unguarded operating machinery or electrical equipment
32. Use only proper tools and equipment maintained in good working condition. If a tool is damaged or broken notify your supervisor, remove from the site, and tag the tool "Do not use".
33. Gasoline must not be used for any purpose other than motor fuel. No employee will siphon gas by mouth, pour into the fuel tank of an engine that is running, or use as a cleaning solvent. Gasoline will be transported in approved, metal containers.
34. Use proper lifting techniques when lifting or carrying objects. Use legs to lift, keep load close to body, keep feet shoulder-width apart, and ask for assistance to lift heavy objects are a few reminders in proper lifting.
35. Erect barricades around hazardous work areas such as holes in decking, trenches, overhead hazardous work, open unattended vessels, or hazardous storage.
36. Fall protection shall be worn when working at heights greater than 6 feet.
37. Pay close attention to slip, trip and fall hazards and eliminate those hazards immediately.



38. If a normal procedure must be changed to accommodate the work situation, contact client and Trinity Energy Services, LLC management before this change is made.
39. All work areas will be equipped with properly working fire extinguishers.
40. Visitors must follow all applicable safety rules as well as be authorized to be in any area.
41. Do not introduce any flame, spark, or sufficient heat (to include non-intrinsically safe equipment) into areas that have a potential for flammable materials/atmospheres. Follow Hot Work Procedures.
42. Follow Defensive Driving techniques when operating motor vehicles. Follow all applicable local, state and federal transportation laws.
43. Do not enter confined spaces unless proper procedures have been followed.
44. All jobsites will have first aid and eye wash equipment readily available and these supplies shall be in good condition.

## **Drug, Alcohol, and Weapons (Substance Abuse Program)**

### **Purpose of the Policy**

Trinity Energy Services, LLC has established a drug, alcohol, and contraband policy for the following reasons:

1. To assist in providing a safe and healthy working environment for our personnel.
2. To protect our property and the property of our clients,
3. To cooperate with our clients in their efforts to provide safe and efficient operations, and
4. To project a positive image within our community.

### **Policy Statement**

The use, possession, concealment, transportation, promotion, distribution, or sale of the following items or substances by any Trinity Energy Services, LLC personnel or by any personnel of a Trinity Energy Services, LLC subcontractor is prohibited on all company premises:

1. Illegal drugs, controlled substances (including trace amounts), look-alike drugs, designer drugs or any other substance which may affect the human body like a narcotic, depressant, stimulant, hallucinogen or cannabinoid.
2. Unauthorized intoxicating beverages.
3. Firearms, weapons, explosives, and ammunition.
4. Unauthorized items: Stolen property, drug paraphernalia, and contraband.
5. Unauthorized prescription drugs.

Working under the influence of any drug is strictly prohibited. Even trace amounts of a drug in an employee's circulatory system are grounds for immediate termination. Remember, what you do at home can and will effect what you do at work.

### **Weapons**

Firearms of any type, Archery, Explosives, Fireworks, Knives with blades greater than 4 inches, Armament systems and Procedures batons, Electroshock Tasers or stun guns, Martial arts instruments and Chemical agents are strictly prohibited on company premises.

"Company premises" is defined as any location at which work is performed by Trinity Energy Services, LLC, or one which is assigned to Trinity Energy Services, LLC for its use by a client or another contractor, including parking lots and storage areas. Automobiles, trucks and any other vehicle or piece of equipment, whether company-owned or leased, that will be operated in any capacity at a Trinity Energy Services, LLC location (as defined in this paragraph) is included in this definition.

No prescription drugs shall be brought on company premises by any person other than the person for whom the drug is prescribed by a licensed medical practitioner, and shall be used only in the manner, combination and quantity prescribed. Any employee who is using prescription drugs under a doctor's order must notify his supervisor of the identity and dosage of such prescription drugs prior to beginning work. The employee shall also authorize the company to contact his treating physician to determine if the prescription drug or medication produces side effects, which may be hazardous to the employee's work activity. Trinity Energy Services, LLC reserves the right to consult with an independent physician to determine the effects of a prescription drug or medication on an employee's ability to work safely and productively. If an employee fails to inform his supervisor that he or she is taking a prescription medication, disciplinary action will be taken. These policies will be implemented in a manner that will comply with all applicable federal and state laws.

### **Safety of Workforce--Searches, Inspections, and Drug Testing**

In order to ensure the safety of the workplace and the workforce, each employee, as a condition of continued employment may be required upon request of company supervisory personnel to:

- I. Submit to a search of any vehicle brought onto or parked on company premises or on any premises on which the company employees are performing work.
2. Submit to a search of any pocket, package, purse, briefcase, tool box, lunch box, clothing, container or materials brought onto company premises or on premises where the company employees are performing work.
3. Submit to searches and inspections of desks, file cabinets, or work areas.

Each employee, as a condition of employment, may be required to submit to blood, urine or other medically approved drug testing procedures to ensure a drug and alcohol free work environment. The drug and alcohol testing may be utilized in, but is not limited to, the following circumstances:

1. Pre-Employment
2. Post-Accident
3. Random testing
4. Reasonable Suspicion
5. Return-to-Duty
6. Follow-up

The results of physical examinations and medical testing are confidential and will only be shared with the employee, and those managers who will determine what subsequent action must be taken, if any.

### **Effective Date**

The provisions set forth in this policy will be implemented and effective immediately. Each person will be given an opportunity to read the related policies and will sign an acknowledgment that he/she understands the established requirements. Copies will be made available to all employees.

## **Subcontractor Guidelines and Procedures**

Trinity Energy Services, LLC does employ subcontractors. The Subcontractor Guidelines and Procedures, as well as all other safety requirements, are binding upon all subcontractors. Adherence to these guidelines and procedures are a prerequisite for work on all Trinity Energy Services, LLC projects. Furthermore, all Trinity Energy Services, LLC subcontractors will abide by Trinity Energy Services, LLC client requirements. After all subcontractor employees have read and understand these guidelines and procedures, sign the Subcontractor Policy Acknowledgement and return to the Trinity Energy Services, LLC office. A copy of these guidelines and procedures should be kept for reference. Failure to follow both Trinity Energy Services, LLC and client safety procedures is grounds for removal from worksite and potential termination of all future work relationships.

An incident-free project is a high priority for Trinity Energy Services, LLC. Maximum subcontractor management and employee attention shall be placed on this priority.

Each subcontractor is responsible for the safety of his employees. The Subcontractor is responsible for the action or inactions of his employees. Subcontractor is responsible for protecting his employees from the byproducts of work conducted, i.e. fumes, silica, and chemical exposure.

All subcontractor employees will work in conjunction with Trinity Energy Services, LLC employees in order to ensure workplace safety. All parties, whether individually or as a group, are responsible for stopping work if a hazard exists. Subcontractors are responsible for bringing safety concerns to Trinity Energy Services, LLC management.

These guidelines and procedures are minimum requirements and are not a substitute for an active subcontractor safety program. Likewise, each subcontractor will institute safety per job/client specific requirements. Trinity Energy Services, LLC will assist in fulfilling client-specific requirements for subcontractors but are not wholly responsible.

Subcontractors will attend and participate in Trinity Energy Services, LLC's Jobsite Safety Analysis (JSA) conducted each day at every job site. This attendance does not take the place of the subcontractors' regularly scheduled safety meetings/training. Trinity Energy Services, LLC is not responsible for training subcontractor employees.

Subcontractors will abide by all local, Federal, and State laws. Subcontractors' suppliers will abide by the same conditions herein

Subcontractors will designate a Safety Representative for each job. This person will work in conjunction with Trinity Energy Services, LLC Management and Safety. The Safety Representative must be qualified as deemed within same industry.

Subcontractor will report all near misses and incidents to Trinity Energy Services, LLC immediately.

Subcontractor will maintain the following records and these records are subject to Trinity Energy Services, LLC inspection:

- Record of all industrial injuries;
- Individual injury reports;
- Safety training rosters;
- Job site inspection reports;
- Results of any OSHA or regulatory agency report;
- Subcontractor HSE Employee Manual
- Any other safety-related documentation

**Trinity Energy Services, LLC reserves the right to employ subcontractors or discontinue employment of subcontractors based on workplace safety history.**

Subcontractors are responsible for providing trained employees that are willing to follow all safety regulations. "Trained employee" is an employee that is capable of efficiently completing assigned tasks without causing injury to others or property damage.

**General Safety Rules for Subcontractors**

The following rules are guidelines that reinforce the subcontractors' safety programs. These guidelines are not intended to provide the exact, written context of the subject matter. The following information highlights key information. The final application of all safety requirements is the sole responsibility of each Subcontractor.

- Unsafe workmanship, hazardous risk taking, and horseplay will not be tolerated at any time.
- Subcontractors will limit presence to those areas which are deemed within subcontractors' scope of work.
- Subcontractors will provide necessary facilities to meet the needs of their employees.
- Subcontractor will provide adequate storage for equipment brought to the job. Trinity Energy Services, LLC is not responsible for subcontractor equipment.
- Fighting, gambling, possession of firearms, possession or use of alcohol or unauthorized drugs will be reasons for subcontractor removal from jobsite
- Smoking is allowed in authorized areas only.
- All personal protective equipment will be worn on the job as hazards and/or the client

dictates. At a minimum, hard hat, steel toe foot-protection and safety glasses will be worn.

- Grinding shields will be worn when grinding or huffing.
- Splash goggles will be worn when handling chemicals.
- All vehicles operated on Trinity Energy Services, LLC or client property will be operated in a manner that reduces the chance for injury or property damage.
- Good housekeeping is mandatory.
- Subcontractors will provide first aid services for their employees.
- If friable asbestos materials are found at a jobsite, work will cease and this discovery reported to the Trinity Energy Services, LLC Supervisor. Do not disturb asbestos unless properly trained and the proper equipment is available.
- Fall protection is required anytime an employee is exposed to a 6 feet fall hazard or more.
- Defective or damaged tools or equipment shall not be used.
- Tools and equipment shall be used for the purpose for which they were designed.
- Ground-fault circuit interrupters will be used for all 120-volt service.
- A competent person will inspect all work areas for safety hazards, report hazards to Trinity Energy Services, LLC if found, and assist in the correction of any hazard.
- Combustible materials and hazardous chemicals will be properly stored.
- Subcontractor will ascertain, before work begins, as to whether or not a work permit is required or special considerations are to be met.
- Compressed gas cylinders will be stored properly by tying back and installing caps on unused bottles.
- Care will be taken to minimize trip hazards.
- Equipment will not be fueled while it is hot.
- Cell phones will not be used when the vehicle is in motion.
- Subcontractors will provide fire extinguishers as the job situation dictates.
- Subcontractors will not fight fire beyond the incipient stage.

- Subcontractors will participate in lockout/tagout by applying their locking device, and by being available to remove the lock and supervise the subsequent start up.
- Subcontractors will be aware of emergency procedures and must be capable of summoning emergency assistance.
- All potential underground facilities will be marked and the location of each known before the ground is broken more than 6 inches.
- Unless authorized in writing, subcontractors are not allowed to operate Trinity Energy Services, LLC equipment.
- ED If a subcontractor does not completely understand the task at hand; he will stop and ask for further clarification from the subcontractor supervisor and then the Trinity Energy Services, LLC supervisor if enough information is not obtained.
- Equipment will be chocked when parked on uneven terrain, and the emergency brake must be set.
- Sparks, heat, flame or non-intrinsically safe equipment will not be introduced into areas that may have explosive or hazardous atmospheres. If sparks, heat, flame or non-intrinsically safe equipment must be introduced into these areas, a Hot Work Permit must be completed.

## **Record Keeping**

Below is a table of required records, minimum retention times, and inspection/audit frequencies. While Trinity Energy Services, LLC does not generate all of these records at this time, work situations may change that would require additional record retention.

The Safety Department, along with Human Resources, is responsible for generating and storing these records. These records shall be stored in a manner where there is no potential for damage.

**Note:** When Trinity Energy Services, LLC joins a client in completion of a work permit, the Trinity Energy Services, LLC Supervisor shall make an attempt to obtain a copy of the permit for record keeping purposes.

Safety records are maintained for the following reasons:

- Trend analysis
- Medical and health records
- Training documentation Legal requirements
- OSHA requirements
- Personal protective equipment requirements
- Client requirements
- Audit requirements
- Legal requirements
- OSHA requirements
- Personal protective equipment requirements
- Client requirements



<b>REQUIRED RECORDS</b>	<b>MINIMUM RETENTION PERIOD</b>	<b>INSPECTION/AUDIT FREQUENCY</b>
Accident / Incident Report	6 Year (indefinitely)	As Needed
Audiometric Test	Indefinitely	Annually
Dosimetry Samples	Duration of employment + 30 years	When a change occurs
Hearing Conservation Program	3 Years	As Needed
Sound Level Surveys	Indefinitely	As Needed
Location Diagram of Sound Levels	Current	As Needed
Employee notification of Dosimetry results	Duration of employment + 30 years	As Needed
Employee exposure records (including monitoring, samples, medical records)	Duration of employment + 30 years	As Needed
Bloodborne Pathogens Exposure Control Plan	Current	Annually
Bloodborne Pathogens Immunization/ Declination Forms	Duration of employment + 30 years	As Needed
Bloodborne Pathogens Incidents and Exposure	Duration of employment + 30 years	As Needed
Bloodborne Pathogens Training	3 Years	As Needed
CPR/ First Aid Training	3 Years	As Needed
CDL Driver Qualifications	Duration of employment + 30 years	Annually
Confined Space Entry Permits	Current year + 1 Year	Annually
Confined Space Program Review	Current	Annually
Confined Space Training Records	3 Years	As Needed
Material Safety Data Sheets (MSDS)	Indefinitely	Annually
OSHA 5 in 1 Poster	Current	Annually
OSHA Citation	Current/ Hold indefinitely	Annually if applicable
Hazard Communication Program	Current	Annually
Master Chemical List	Current	Annually
Hazard Communication Training Records	3 Years	As Needed
HAZWOPER Incident Management Plan	Current	Annually
HAZWOPER Training Records	3 Years	Annually

Employee Orientation	Duration Of Employment	As Needed
Job Safety Analysis (JSA)	Current + 6 Months	As Needed
Safety Meeting attendance	3 Years	As Needed
Safety Training Records	Current	As Needed
Vehicle Registration, Insurance	Life of Equipment	As Needed
Insulating equipment test documentation and certification	3 years	Annually
Electrical Safety Training	Current	Annually
Emergency Alarm and Evacuation Procedures (Drills)	3 years	Annually
Forklift Training Records	1 year	As Needed
Daily Forklift Inspections		Daily
Lockout/Tagout		Annually
LOTO Program Review		Annually
Personal Protective Equipment Hazard Assessment		As Needed
PPE Training Record	3 Years	As Needed (as change in hazards)
Respiratory Protection Program Evaluation	Current	Annually
Respiratory Hazard Assessment	Current	As Needed
Respiratory Protection Procedures	Current	As Needed
Respiratory Protection Training	3 Years	As Needed
Medical Evaluation	Duration of employment + 30 years	Annually
Respirator Use Questionnaire	Duration of employment + 30 years	As Needed
Fit Test	Current	As Needed
Respirator Inspections	Current	Monthly
Grade D Breathing Air 1. Purchased Air 2. Produced Air	1. 10 Years 2. 10 Years	1. Batch 2. Every 90 Days or before Each Use
Hot Work Permits	Current, 1-6 months	As Needed
NORM Survey	Indefinitely	As Needed
H2S Training	3 Years	As Needed
H2S Medical Records	Duration of employment + 30 years	As Needed

## **Incident Procedures and Emergency Response**

Trinity Energy Services, LLC has established this program to outline the procedures to follow in the event of an accident, incident, or emergency. Accidents, incidents and emergencies are defined as injuries, releases or spills of company or client product, fires, vehicle incidents, property damage, weather related emergencies, or natural catastrophes. Accidents, incidents and emergencies are differentiated by the cause and magnitude of the event.

The following is a prioritized list of the objectives of a responder to an incident:

1. Reduce human loss and suffering
2. Minimize the loss of public or client property
3. Minimize the loss of Trinity Energy Services, LLC property

### **Employee/Client/Visitor Injury Procedures**

When an employee, client, or visitor is injured at an Trinity Energy Services, LLC work-site, the Trinity Energy Services, LLC supervisor is responsible for ensuring that first aid is administered, and, if necessary, the proper medical attention is obtained as quickly as possible. In addition, the supervisor must protect other employees and equipment from any resulting or potential hazard, and notify the Safety Coordinator, Trinity Energy Services, LLC management, and the appropriate client representatives. The supervisor is authorized to delegate these responsibilities in the event that he is an injured party, or his obligation to administer first aid prevents him from completing the subsequent tasks mandated by the incident response.

The supervisor must adhere to the following protocol while responding to an accident or emergency that involves an injury:

1. Go to the scene immediately. Bring first aid materials and a means to record the events.
2. Secure the area and administer first aid to the best of your ability.
3. Summon outside emergency services if necessary.
4. Gather evidence in an attempt to remedy the problem. Look for the underlying causes, such as unsafe conditions or unsafe practices.
5. Collect a statement from the injured person and any witnesses to the accident. Stress the importance of gathering the facts, and discourage employees and/or witnesses from trying to place blame or responsibility. Ask open-ended questions that encourage detailed answers, and listen for additional information in the conversations around you because unsolicited comments often have merit.

6. Encourage all employees to voice their ideas for preventing similar accidents.
7. Confer with interested persons about possible solutions.
8. Take photographs of the scene whenever possible.
9. Write the accident report giving complete, accurate accounts of the accident.
10. Follow-up with recommendations to ensure conditions are corrected.

### **Response to Product Spills**

While working with or around any chemical, an employee must know what engineering controls, and safe work practices have been implemented for his/her safety, and what personal protective equipment is required while performing the job.

Material Safety Data Sheets will serve as the primary source of information regarding handling, spill, contact, and clean-up procedures.

Trinity Energy Services, LLC employees work around various chemicals while performing their job. A product release or spill is always feasible, so attention to safety and prevention is critical. These spills pose physical hazards (combustible liquid and/or gases), and health hazards (carcinogens, corrosives). Some spills require professionally trained responders (i.e. Hazwoper), so be certain to reference the appropriate IVISDS whenever there is a release of product.

Response to spills and releases should adhere to the following procedures (each situation will dictate different responses based on spill types/amounts, and these are general procedures):

1. Report all spills to clients and Trinity Energy Services, LLC immediately (degree of spill amount,
2. reporting and related hazards are left up to the decision of client and management)
3. Summon emergency services per client and management directives.
4. Do not enter the contaminated area without respiratory and skin contact protection. Enter only if you have the appropriate training.
5. Do not try to rescue the person by holding your breath and entering the contaminated area.
6. Even with proper respiratory protection. do not enter a contaminated area without standby help.
7. As soon as the victim is in a safe area, personnel should conduct an assessment to determine

if the victim is breathing and perform cardiopulmonary resuscitation (CPR) if needed.

8. Any employee who experiences a significant exposure to any hazardous substance, either liquid or vapor, must report the incident to the supervisor immediately. The supervisor ensures that the safety department has been contacted, and Safety will initiate the applicable protocol for testing and medical response.
9. If toxic materials contact the skin or clothing, remove the contaminated clothing and refer to MSDS for first aid procedures. Launder these clothes separately.
10. Cleanup of spilled material is based on Material Safety Data Sheets and those persons conducting cleanup will be trained and equipped to do so.
11. Personnel should avoid ditches, bell holes, ravines, and other low-lying areas where vapors, fumes, or mists may collect.
12. If necessary, evacuation should be upwind and crosswind.

### **Response to Fires**

Trinity Energy Services, LLC works in environments where there is a potential for fire. Due to this fact, response to fire situations and the reporting of these fires is necessary. Note; Trinity Energy Services, LLC does not employ or train firefighter level-individuals; therefore, fighting fires beyond the incipient stage is not allowed.

1. Notify everyone in area to evacuate and go cross and upwind to a higher elevation.
2. Call emergency response as necessary or send someone to call for emergency response and have that person report back to you as to the status of arrival. Note: Fire departments/emergency response would rather show up to a situation under control than to one that is out of control.
3. Render first aid or summon for first aid assistance.
4. Gather fire suppression equipment. Note: Never fight a fire if there is no adequate firefighting equipment (the escape path could become blocked), or the fire is spreading beyond control. Fight fires at the incipient (beginning) stage only. Do not attempt to extinguish a fuel source if the fuel source cannot be eliminated.
5. Attempt to extinguish fire by aiming at base of fire and using a sweeping motion. Stay at least 4 to 6 feet away.
6. Never turn your back on the extinguished fire. Back away.

7. Stay at area to see if there is re-ignition.
8. If you are alone, and a fire situation occurs, immediately summon help before any other action is taken.
9. Document all actions and occurrences leading up to the fire and all actions taken after the fire started.
10. Have all fire suppression equipment recharged immediately.

### **Response to Vehicle Incidents**

If you are involved in a vehicle incident:

1. Stop at once. Check for personal injuries and send or call for an ambulance if necessary. Do not leave the scene but ask for assistance.
2. Protect the scene. Set emergency signals to prevent further injury or damage.
3. Secure assistance of a law enforcement officer whenever possible.
4. Record Officers' name.
5. Record names and addresses of all witnesses and occupants of involved vehicles.
6. Record vehicle license numbers.
7. Do not argue! Make no statement except to proper authorities. Sign only official police reports. Do not plead guilty or admit fault.
8. Complete accident report stored in vehicle to the best of your ability.
9. Contact your employer.
10. Do not attempt to operate the vehicle. It may have damage that you are not aware of.
11. Assist the Safety Department in their report/investigation process as well as be available for all required drug/alcohol testing.

## Response to Property Damage

If any company, public, private, or client property is damaged, follow these procedures:

1. Report the incident to a Supervisor/Management immediately. Even if you think the situation is not serious, the incident must still be reported.
2. Determine if damage is causing or will cause harm to persons and respond appropriately. (Example: If a fence is down and cows will get out and onto the road, then this is a situation that could cause harm to persons and does need immediate attention or you back over a pipeline riser and bend it slightly, potentially, the stress in the metal could cause line failure.)
3. Do not continue to operate equipment until it is deemed safe by a qualified and competent person.
4. Make repairs to the level you are competent for. Never bypass a safety measure or operate unsafe equipment.
5. Document all occurrences.

## Response to Weather-Related Emergencies or Natural Catastrophes

### 1. Hurricanes

The Manager will monitor the phase alerts and assess the situation as the phase alerts are given. He/she will advise all personnel of the hurricane alert and designate responsibilities accordingly.

Trinity Energy Services, LLC management will notify personnel if an evacuation is necessary.

- a) **Phase 1** alert will be issued when a tropical storm or a hurricane is formed that could possibly affect area operations.
- b) **Phase 2** alert will be issued when it appears that a tropical storm or a hurricane is headed in a direction that will pass through or near area operations.
- c) **Phase 3** alert will be issued when it is apparent the hurricane will hit the area of operations, and it is necessary to shut down area operations and evacuate all personnel.

### 2. Tornadoes

Trinity Energy Services, LLC management will monitor the two-phase tornado alert system posted by

weather agencies:

- a) **Tornado Watch** is issued when weather conditions are conducive to a tornado.
- b) **Tornado Warning** is issued when a tornado has been sighted in the area.

Trinity Energy Services, LLC Supervisors will assess the situation and notify personnel of the severe weather conditions and actions to be taken. All loose materials and tools should be moved inside or secured in place. Following a storm, all personnel must be accounted for. If injuries have been sustained, they must be attended to accordingly.

If a tornado is sighted, and it appears that it will come close or pass over a location, seek shelter if possible. If a shelter is not available, move away from the tornado's path at a right angle. If there is not time to escape, lie flat in the nearest depression, such as a ditch or ravine.

In buildings without basements, take cover in the smallest room with sturdy walls, or under heavy furniture, or a tipped-over couch or chair in the center part of the building. The first floor is safer than higher floors. If there is time, open windows partly on the side away from the storm's approach, but stay away from windows due to debris and flying glass.

Mobile buildings, or buildings on blocks, are particularly vulnerable to overturning and destruction during strong winds, and should be abandoned in favor of a pre-selected shelter, or even a ditch in the open.

Parked cars are dangerous during a tornado or severe windstorm; however, as a last resort, if no ravine or ditch is nearby, they may provide some shelter from flying debris to those who lay on the floorboard inside the car.

In preparation for storm season, battery-operated radios should be obtained in case of a power loss, related safety rules and procedures should be reviewed, and a training on identifying an approaching tornado, and the subsequent change of work plans to remain near a shelter during a severe storm threat should be conducted.

### **3. Floods**

Carefully determine the area affected by the high water. If possible, do the following:

- a. Move equipment and materials to higher ground.
- b. Sandbag areas where water can be diverted.
- c. Monitor exits to be certain they are not blocked by floodwater.

When driving a vehicle, do the following:



- a) Be cautious of obstacles and low spots hidden by the water.
- b) Beware of low spots where water currents may be high enough to sweep a person or even a vehicle off the road,
- c) Be cautious of driving through water high enough to kill an engine and/or damage a vehicle.
- d) d. If necessary, use vehicles with high ground clearance to ferry personnel through high water. Be sure the water is not too deep to drive through.

Beware of equipment that is submerged, especially when there is a potential for electrical shock.

Be cautious of snakes, animals, and insects driven from their natural habitat by high water.

### **Flash Floods**

If a flash flood is expected to occur and time permits, supervisors should coordinate the following activities:

- a) Shut down the operations.
- b) Evacuate all non-essential people out of danger area.
- c) Secure all loose material, equipment, etc.
- d) Move mobile equipment to higher ground.
- e) Evacuate remaining people out of the danger area
- f) After a flash flood has hit the location, do the following:
  - g) Administer first aid to any injured people and arrange for medical assistance.
  - h) If a fire, explosion, equipment failure has occurred, follow appropriate procedures.
  - i) Survey and report damages\_

### **4. Freezing Rain/ Ice Storms**

When driving in freezing rain or ice, do the following:

- a) Minimize traveling until road conditions improve.

- b) Be cautious of bridges and overpasses during icy conditions. Watch for fallen power lines, tree branches, etc.
- c) If it is necessary to cross a frozen bridge or overpass, reduce speed, approach straight on and drive straight across. Do not touch the brakes, turn the wheels, or accelerate while crossing.

When working in potentially icy conditions at a Trinity Energy Services, LLC jobsite, do the following:

- a) Use salt or sand on slippery surfaces.
- b) Be aware of the increase potential for icy conditions on elevated walkways, steps, and ramps, etc. Use salt or sand on these surfaces to minimize the potential.

## **5. Other Natural Emergency Conditions**

Think through what must be done in the event of other natural emergency conditions and be prepared. Discuss emergency procedures and arrange Communications, first aid, transportation, and other details before an emergency occurs.

## **Accident/Incident Reporting and Investigation**

All incidents, no matter how minor, must be reported to a supervisor immediately. Subcontractors must also comply with this requirement. "Immediately" is defined as within fifteen (15) minutes of the incident, or sooner if the situation dictates.

Trinity Energy Services, LLC implemented this program in order to establish a protocol for incident reporting and investigation. The Safety Coordinator will be responsible for investigation (or delegating the investigation of) all accidents. The goal of this program is to prevent future incidents by studying the information collected during investigations to determine a root cause and subsequent work practice or procedure changes necessary for safety. Additionally, the investigation will be used to prepare the reports that are required by federal and state regulation, and our insurance provider. These reports are critical in establishing company liability.

In order for the Accident/Incident Investigation Report to be effective, it must contain a detailed answer to the following questions:

What was the employee(s) doing?

Where was the employee when he/she was injured?

What happened in detail? Avoid vague responses or statements.

What caused the accident? This will be answered in greater detail when a Root-Cause Analysis is completed.

What can be done to prevent a similar accident?

Employees' name

Employee's hourly wage and weekly wage?

Employees address, phone number, spouse's name and number of dependents

Employees' Supervisor

List of witnesses, and their written statements. These witnesses sign and date these statements.

What was the condition of the equipment involved?

What was the proper response to the situation, and could this be improved upon?

Did the Job Safety Analysis list the situation that occurred as a potential hazard, and why didn't the method of protection from this hazard prevent the incident from occurring?

The information gathered in the Investigation Report will be utilized to develop a Root-Cause Analysis—the primary cause of an incident. Management may require the individuals involved in the incident to meet and discuss the incident. If so, the entire incident scenario will be discussed and recommendations made. The Safety Department will record all notes taken during the Root-Cause Analysis and make the final report available, with recommended actions and date of completion, to all affected employees.

## **Restricted (Light) Duty/Case Management**

Restricted duty provides employees who have experienced a work-related illness or injury with work during the time that they are unable to complete all of their regular job duties. Trinity Energy Services, LLC based on the health care provider's input, will arrange restricted duty work to accommodate the needs of the company and the needs of the employee. While on restricted duty, Trinity Energy Services, LLC and the healthcare provider will monitor the employee's progress. At no time will the employee on restricted (light) duty exceed the physical limits established by the healthcare provider.

Proper authorization for restricted duty should be obtained in writing prior to an employee's starting any restricted duty work. All such medical correspondence will be maintained in the employee's file. Human Resources is responsible for sending to the employee a Bona fide Offer of Employment that corresponds with the work limitations established by the healthcare provider. Whenever possible, restricted duty should be recommended over absence from work, unless the healthcare provider feels that any work in any capacity is not medically advisable.

### **Restricted Work: Purposes and Benefits**

Employees are our most valued assets. Their safety and well-being are a major concern for Trinity Energy Services, LLC. When our employees are injured or ill, it is our intent to assist them with a quick recovery and return them to meaningful employment as soon as possible. To that end, a period of Restricted Duty work:

1. Minimizes the injury's impact on the employee and Trinity Energy Services, LLC
2. Promotes rapid recovery from injuries/illness
3. Provides a safe and timely transition back to work

The employee and Trinity Energy Services, LLC benefit when Trinity Energy Services, LLC can offer an injured employee meaningful temporary Restricted Duty:

The Employee:

1. Tends to recover more quickly;
2. Participates in some type of work activity as soon as he/she is medically able;
3. Experiences a smoother transition back to regular duty;
4. Feels improved self-esteem in spite of medical condition;
5. Maintains relationships with co-workers and management; and
6. Sees management's commitment to employee welfare.

### The Employer:

1. Keeps a trained and experienced worker;
2. Reduces the costs associated with the loss of production and replacement of an employee;
3. Improves work ethic;
4. Promotes employee morale/security; and
5. Fosters better communications with employees.

### Restricted Duty is recommended by Trinity Energy Services, LLC when:

1. The employee's medical condition temporarily prevents the employee from performing his or her full regular duties, including full-time work; or
2. The Trinity Energy Services, LLC physician:
  - a) Believes the employee's condition is temporary, and will probably improve with an appropriate amount of time and/or treatment;
  - b) Feels that the maximum medical improvement has not yet been attained
  - c) Has provided instructions for specific restrictions in writing to the employer

## General Information

### Guidelines

Trinity Energy Services, LLC will closely evaluate physician recommendations for Restricted Duty. The physician will re-evaluate all employees on Restricted Duty on a periodic basis to be established by the company and its Safety Department. Company management and the physician will continuously review the appropriateness of continuing Restricted Duty. The following are some general guidelines about Restricted Duty:

1. Restricted work assignments are temporary and are intended to facilitate a return to regular duty. Restricted duty assignments are not intended or permitted to become permanent.
2. Only the healthcare provider can recommend permanent limitations, since these may impact employment (This is not generally done by the healthcare provider unless maximum medical improvement has been reached.).
3. Extension of Restricted Duty beyond 30 days should be based upon discussions with the healthcare provider and upper Trinity Energy Services, LLC management. (The advisability of extending the restrictions beyond 30 days may vary related to the medical condition/injury or manpower needs.)

4. Restricted Duty should be extended only when it is determined by the healthcare provider that the additional time would facilitate a return to full regular duties.
5. Restricted Duty extensions should not adversely affect the Department's operational goals or the objectives of the transitional work process.
6. Restricted Duty assignments must be offered to the employee as soon as he/she is released for Restricted Duty by the healthcare provider.
7. There is no set limit on the number of employees permitted to participate in Restricted Duty at any one time. However, multiple Restricted Duty assignments at any given time may impact company operations; consequently, limits on the number of employees, and the amount of time on Restricted Duty shall be at the sole discretion of Trinity Energy Services, LLC.
8. The healthcare provider's recommendations will be taken into consideration when offering the number of hours and days on Restricted Duty.
9. The assignment can be less than 40 hours per week but cannot exceed 40 hours per week.
10. The employee will get paid at his full customary rate while on Restricted Duty.

#### **Communication Responsibilities of Employees and Supervisors**

Employees are required to either arrive for work on time, or to notify their supervisor before the start of their shift, so that he has time to replace or cover the absent or tardy employee.

When an employee does not show up for work, he must call his supervisor the first day that he fails to come to work and tell the supervisor the reason, explicitly noting if the reason is a work related injury or illness. He or she must-contact Trinity Energy Services, LLC before they go to the healthcare provider for work-related injuries or illnesses. If an employee is absent and does not call by noon, the supervisor should attempt to contact the employee by phone. If the employee informs his Supervisor that his absence from work is due to a work-related injury; the Trinity Energy Services, LLC Supervisor shall immediately contact the Safety Department to coordinate the medical attention for the injured employee.

Supervisors should communicate with employees who are on Restricted Duty status on a regular basis.

Supervisors and the safety department must document all information related to the employee's injury or illness.

The Supervisor will attend a monthly meeting with Safety and Trinity Energy Services, LLC management to discuss the Restricted Duty cases and to develop pro-active plans to return the employee to regular duty. The injured employee should attend these meetings and give thoughts

about his ability to return to work, date of next doctor's appointment, and the need for modification of duties to support progress toward return to full duties.

Those employees who are not working due to a work-related injury must be contacted by their immediate supervisor weekly. These contacts must be documented. Supervisors will review the employee's condition with the employee and verify that the employee's needs are being met, and discuss plans to return to work (restricted or regular duty). Furthermore, the Supervisor will secure the employee's ideas on recovery and return-to-work opportunities.

Supervisors should review Restricted Duty assignments with the employee weekly to:

1. Review appropriateness of the work assignment
2. Reinforce safe work behaviors
3. Request revisions in the Restricted Duty from the healthcare provider if it seems relevant
4. Provide appropriate communications with employee's supervisor when the employee is working in a different Trinity Energy Services, LLC work area

### **Restricted Duty Assignments**

Supervisors and Safety should contact Trinity Energy Services, LLC management as soon as they are aware that a worker is to go on Restricted Duty.

Employees that are on Restricted Duty are to be assigned to the same general work shift, and to the same workweek that they were assigned to prior to their injury. If Restricted Duty is not available in the same work area, management will attempt to provide an alternative.

No overtime is allowed for Restricted Duty participants.

The assignments must be designed to provide meaningful tasks to the employee, assist with the employee's recovery, enhance productivity and reduce cost.

#### Restricted Duty is not

Punitive  
Permanent  
A promotion  
A "Job"

#### Restricted Duty is

Productive and necessary  
Temporary  
Supervised  
Rotational / variable tasks



## **Restricted Duty Offer/Refusal of Restricted Duty Assignment**

After the employee is seen by the healthcare provider and is given the appropriate Restricted (Light) Duty paperwork, he must provide a copy to both the safety department, and his immediate Supervisor.

While the company has the option of limiting the type and amount of Restricted Duty based on feedback from the healthcare provider and according to operational needs, a company request for an employee to report to work in a specific capacity (e.g., in a "restricted duty capacity" or a "normal duty capacity") is a fundamental job requirement. As such, employees are required to comply with the request to report for work in order to maintain his or her employment. Failure to report on time, to work in the requested capacity, or to perform the designated duties could result in the termination of employment.

## **Job Safety Analysis (JSA)**

### **Hazard Identification and Risk Assessment**

Hazard identification and risk assessment are vital components of every safe work environment. Management has implemented a Job Safety Analysis (JSA) program to prevent accidents by identifying hazards, and then developing corrective action to eliminate, or reduce the hazards, both existing and potential, to an acceptable level before initiating work.

The goal is to:

1. Identify the potential hazards
2. Identify appropriate methods to reduce or eliminate the hazards
3. Fulfill requirements of the Customer
4. Create a PPE Hazard Assessment

JSA's must be completed before each job (routine or non-routine) is begun, and whenever a new process is introduced, a procedure is modified, or a change in products, services or operation is implemented. If the scope of the job changes, a new JSA is required, and all affected employees must participate in the completion of the new document.

Every affected employee and subcontractor employee is required to participate in the completion of the JSA, and all are expected to sign the document once it is completed. When the client does not provide a JSA form to complete, Trinity Energy Services, LLC will make theirs available and request that the client representative(s) participate.

Work permits (i.e. Hot Work Permits, Confined Space Entry, and Lockout/Tagout) may accompany the JSA.

Who should participate in filling out a JSA?

1. Job Foreman should lead the JSA team
2. Gang Pusher/Supervisor
3. Employees who are experienced in performing the job
4. Technical experts (mechanics, engineers, etc.)
5. Customer representatives
6. Personnel with no experience in performing the job (often bring unique insight)
7. All other affected employees

When this process is executed properly, *all* employees will have something constructive to learn and contribute. Blank JSA forms are available in the office. Trinity Energy Services, LLC employees will be trained on JSA procedures during New Employee Orientation.

### **Hazard Identification and Mitigation**

A JSA is one of the primary means of ensuring that employees return home the way that they came to work. It is a fundamental belief of this organization that all accidents are avoidable. Pursuant to this goal and belief, all employees must participate in the daily completion of JSAs in order to assist in the identification and mitigation of existing and potential hazards.

A JSA is designed to stimulate discussion between the employees that will ultimately flush out the existing and potential hazards that are either present on the jobsite or applicable to the job being performed. Once identified, hazards must be minimized or eliminated through engineering controls, work practices, or, as a last resort, personal protective equipment (PPE). Whenever possible, engineering controls will be utilized to eliminate the identified hazards. Some examples of engineering controls are:

1. Exhaust and/or Mechanical Ventilation
2. Enclosure/Encapsulation
3. Substitution of Materials
4. Component Replacement
5. Sound Barriers
6. Process or Equipment Modification (i.e. using wet-blasting or vacuum blasting to eliminate hazardous dust)
7. Isolation

It is imperative that corrective measures be documented, and an additional hazard assessment be executed once the corrective measures have been taken in order to ensure that the hazard has been eliminated, and no additional hazards have been created.

If engineering controls and work practices cannot sufficiently minimize or eliminate the hazards that were identified, then PPE must be utilized. Employees must be properly trained in the hazard identification process and on the use, maintenance, and limitations of the PPE they have been provided before they will be authorized to work within the affected jobsite, or perform the applicable task. It is also necessary to make certain that the selected PPE will adequately minimize or eliminate the applicable hazard; for example, if a respirator must be used, it is critical that a competent person be consulted to ensure that the proper respirator is selected and used.

Once identified, hazards must be categorized and prioritized to properly address the most serious first. If an atmospheric hazard, for example, is identified, it may be necessary to evacuate the non-essential personnel and call for additional help to eliminate the hazard. In other situations, a jobsite may need to be isolated by barriers, and the workforce assigned accordingly before any work can be performed. In these situations, it is essential that the appropriate hazards be addressed in order of significance and severity to minimize the affected employees' exposure to the identified hazard.

Documentation mandated by this program must be maintained for at least 6 months, and dependent on the hazards identified, retention requirements may be extended.

It is the responsibility of the Safety Coordinator to ensure that this program is implemented and managed properly.

## **Environmental Responsibilities and Training**

### **Purpose**

Trinity Energy Services, LLC is dedicated to the protection of the environment. Trinity Energy Services, LLC is committed to fulfilling the moral obligation we all have to protect the environment. Furthermore, Trinity Energy Services, LLC will meet or exceed all regulatory and client requirements. Damage to the environment is not a short term, but rather a long term problem.

Employees will be taught the environmental regulations and pollution prevention practices that are applicable to their operating responsibilities. Employees are expected to act on their knowledge by performing their job in a way that complies with regulatory requirements and company policies, standards, guidelines, and procedures.

- Pollution control equipment must be maintained in proper working order.
- Seals on packing glands, flanges and other connections must be maintained in good condition to decrease the amount of gases that escape from worn seals.
- Consider nuisance impacts such as odors, smoke and dust and improve as appropriate.
- Trinity Energy Services, LLC will comply with all client air emission requirements.
- All chemicals will be stored and disposed of properly. All chemical containers will be properly labeled.
- Drums or storage areas will be protected from rain and run off.
- Drip pans will be used to catch any leaks. Leaks will be repaired. Drip pans will be emptied until leaks are repaired.
- Any and all protected plant and animal wildlife will be protected from industrial or other development activities. It is illegal to harm, harass, feed, pursue, wound, capture or possess an endangered species in any way. Trinity Energy Services, LLC will refer to these protection parameters as provided by clients.
- Plants, animals and artifacts, including but not limited to arrowheads, rocks and fossils, must not be removed from leases.
- Do not allow fuel/oils to leak from vehicles. If this does occur, clean up immediately. If a reportable amount per client requirements, report appropriately.
- All trash and liter will be collected and disposed of properly. Do not let trash become free and blow around.

- Pesticides and herbicides will be applied per manufacturer requirements. These chemicals will not be applied during high wind or rain events. Dispose of pesticide and herbicide containers per manufacturer requirements.
- Do not damage retainer walls around tank batteries. If this is necessary, the wall must be rebuilt to original condition before the task is considered complete.
- All drainage and sump systems must be regularly inspected.
- Perform routine visual inspections of all production equipment for leakage or evidence of corrosion, vibration, excessive wear or other conditions such as erosion that could lead to the development of a leak or release. Include wellheads, flow lines and production and storage vessels in inspections.
- Trinity Energy Services, LLC will follow all client SPCC (Spill Prevention and Countermeasure) Plans. The Trinity Energy Services, LLC Supervisor will ask client representatives about any special procedures needed for these plans.
- Trinity Energy Services, LLC will assist in client spill investigations and reporting to the best of their ability.
- The first person to become aware of a spill will try to stop the spill if can be done so safely. Trinity Energy Services, LLC will approach any spill cleanup with the proper training, proper containment equipment and applicable personal protective equipment.
- Trinity Energy Services, LLC employees must be aware of NORM-contaminated wastes (Naturally Occurring Radioactive Materials). Because Trinity Energy Services, LLC does not own any process that produces this type of waste, Trinity Energy Services, LLC must rely on client information about possible exposures.
- Trinity Energy Services, LLC employees will never remove contaminated or potentially contaminated products or waste from any clients' property. Trinity Energy Services, LLC will assist the client in contacting those companies who are licensed and trained for contaminated waste removal.
- Trinity Energy Services, LLC will follow all Wetlands requirements as found within the Clean Water Act. Trinity Energy Services, LLC clients must inform Trinity Energy Services, LLC management and employees of these types of environmental considerations.
- Trinity Energy Services, LLC employees may encounter several species of wildlife while on the job. Do not approach, feed, intimidate, or otherwise harass any forms of wildlife. Report any encounters to your immediate supervisor. Many species of wildlife are protected or endangered, harming or killing wildlife could result in state or federal prosecution.

## **Short Service Employee**

### **Purpose**

This procedure provides guidelines for a Short Service Employee Program to appropriately supervise, train and monitor new experienced and inexperienced employees. The program must address the time frame under which an employee is considered a Short Service Employee. This definition should take into account experience in the same job with his/her present employer rather than total work experience.

Trinity Energy Services, LLC defines a “short term” worker as:

An employee that is hired for a short duration or a temporary job and will discontinue work after the job is completed. The worker may or may not have sufficient oilfield experience (6 months or more).

Trinity Energy Services, LLC defines an “inexperienced worker” as:

An employee with less than 6 months of oilfield experience. The highest risk employee would be both inexperienced and short term.

### **Notification**

Prior to the job mobilization, contractors will communicate/notify the project coordinator, contractor contact, or on-site supervisor for all jobs containing SSE personnel. The project coordinator, contractor contact, or on-site supervisor will determine approval status of the crew makeup.

### **Supervisor Responsibilities**

- Ensure Short Service Employee Mentor maintains proper knowledge and skills in the particular job task designed
- Ensure Short Service Employee Mentor is adequately training SSE
- Ensure Short Service Employee is gaining the particular knowledge and skills in the particular job tasks
- Ensure Short Service Employee is appropriately identified per this plan, and follow all safety rules and company policies of the company
- To be sure that a single person crew is not to be an SSE and crew sizes of less than five shall have no more than one SSE

### **SSE Mentor Responsibilities**

The responsibilities of Mentors in the Short Service Employee Program are to:

- Have the desire, a patient disposition, and be willing to devote the necessary time to succeed as a mentor
- Only be assigned one SSE per crew and the mentor must be onsite with the SSE to be able to monitor the SSE
- Possess knowledge and skills in the job tasks assigned to the SSE
- Be willing and able to effectively listen to the SSE to determine if the SSE is learning and retaining the knowledge being shared
- Be willing to watch a SSE perform a job without interfering as long as the SSE is not in a position to hurt themselves, others or damage equipment
- Provide a positive SAFETY attitude, avoid criticism, and strive to build confidence and self-esteem in the SSE
- Be able to teach the SSE the proper way to create a quality JSA and to follow that JSA in performing tasks
- Keep abreast of new equipment in their fields of expertise
- Refrain from taking short cuts and doing anything hazardous to health or safety
- Demonstrate a positive work ethic at all times
- Follow all company policies and procedures

### **Short Service Employee Responsibilities**

The responsibilities of the Short Service Employee are to:

- Be willing to watch and listen to the Mentor
- Establish a positive SAFETY attitude towards assigned job tasks
- Participate and learn the proper development of JSA's and to follow JSA in performing tasks
- Be willing to gain the knowledge and skill in a particular job task to be able to perform in a safe and environmentally sound manner
- Stop and report unsafe conditions at any time
- Participate in safety meetings
- Follow all safety rules and policies of the company

### **Training**

The supervisor shall ensure that each SSE is properly trained in:

- The hazard(s) present in the work place
- The policies, procedures, processes and PPE utilized to control these hazards to prevent illnesses, injuries, property damage and/or environmental incidents
- The skills necessary to conduct their assigned jobs safely and efficiently while providing quality and economy

The supervisor shall ensure that each SSE is properly trained per Federal, State, Industry, Company, and Operator requirements before starting work when:

- The employee is first hired
- The employee is appointed a new job assignment
- The employee is exposed to new substances, processes, procedures, equipment, etc. that represent a new hazard to the employee

### **Supervision**

The supervisor and the mentor will provide supervision and not allow the SSE to perform any task in which they have not been properly trained. The Supervisor and the SSE Mentor shall ensure that the SSE understands the task to be performed and the associated hazards.

### **Contractors**

Contractors shall monitor its employees, including SSE personnel, for HES awareness. If, at the end of the designated time period, the SSE has worked safely, adhered to HES policies and has no recordable incident attributed to him/her, the SSE identifier may be removed at the contractor's discretion. Contractor shall require any employee that does not complete the designated time period recordable free to get operator approval in writing prior to returning to operator property. Contractors will manage their sub-contractors in alignment with this process.

The SSE will be identified by the wearing of a decal that recognizes the employee as a SSE employee. The decal will be placed on each side of the hard hat. The hard hat will have a label placed under the decal indicating the expiration date of the SSE term.

The supervisor shall remove the decals upon expiration of the SSE term, and after verifying that SSE exhibits a knowledge and skill level to perform the job tasks assigned.



## **Stop Work Authority**

### **Purpose**

The purpose of this procedure is to ensure that all Trinity Energy Services, LLC employees are given the responsibility and authority to stop work whenever any of the following conditions exist:

1. Employees believe that a situation exists that places them, their coworker(s), contracted personnel, or the public at risk or in danger
2. That could adversely affect the safe operation or cause damage to the facility
3. That could result in a release of chemical or radiological effluents to the environment above regulatory requirements or approvals
4. This procedure extends the authority to stop work to situations where an employee believes there is a need to clarify work instructions, or to propose additional controls

Trinity Energy Services, LLC employees are encouraged to contribute ideas towards, or provide a method for resolving the issue.

### **Scope**

This procedure is applicable to all personnel working at the jobsite.

### **Responsibilities and Roles**

Trinity Energy Services, LLC employees are responsible to initiate a Stop Work intervention when warranted, and management is responsible to create a culture where Stop Work Authority is exercised freely.

### **Employees**

- The responsibility and authority to stop work or decline to perform an assigned task without fear of reprisal, to discuss and resolve work and safety concerns. The Stop Work may include discussions with co-workers, supervision, or safety representative to resolve work-related issues, address potential unsafe conditions, clarify work instructions, or propose additional controls, etc.
- The responsibility and authority to initiate a Stop Work immediately when the employee believes a situation exists which places himself/herself, a coworker(s), or the environment in danger or at risk.
- All employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of HSE risk exist.
- Are expected to report any activity or condition for which they have initiated a Stop Work. Notification should be made to the affected worker(s), and to the supervisor or their supervisor's designee at the location where the activity or condition exists.

### **Stop Work**

- The responsibility to notify their supervisor if a raised Stop Work issue has not been resolved to their satisfaction through established channels prior to the resumption of work.
- All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.
- Stop Work reports shall be reviewed by supervision in order to measure participation,

determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learning.

- Employee can contact their safety representative with a concern, or to initiate a stop work, if the employee prefers to remain anonymous.

### **Management/Supervisor/Person in Charge (PIC)/ Field Work Supervisor (FWS)**

Management and supervision are committed to promptly resolve issues resulting from an employee-raised Stop Work [10 CFR 851.20]. Management (e.g., Directors, Managers, Supervisors) responsibilities are to:

- Resolve any issues that have resulted in an individual stopping a specific task(s) or activity before returning to work.
- Provide feedback to individual/s and the affected work group who have exercised their

Stop Work responsibility on the resolution of their concern prior to resuming work. If the employee that issued a stop work is not available due to reasons such as vacation, shift change, or training, then the supervisor provides the feedback to the safety representative prior to resuming work.

- Ensure no actions are taken as reprisal or retribution against individuals who raise safety concerns or stop an activity they believe is unsafe.

### **Safety Representatives are expected to:**

- Assist employees, supervision and management in the resolution of safety issues and concerns.
- Immediately contact management and work to resolve issues when an employee has called a situation to their attention that has not been resolved.
- Discuss resolution with employees involved in a work stoppage where resolution was completed after their shift or when they were unavailable, or where he/she acted as their representative in reaching resolution.
- Work as the agent of an employee that prefers to remain anonymous to work directly in the resolution of the stop work.
- Be sure that all employees have received Stop Work Authority training before any initial assignment. The training must be documented including the employee's name, the dates of training and subject.

### **Process**

1. **STOP**
2. Notify
3. Correct
4. Resume

When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected personnel and supervision of the stop work issue, correct the issue, and resume work when safe to do so.

1. Stop work if an activity or condition is believed to be unsafe, such as:

- a. A situation exists that places them, their coworker(s), contracted personnel, or the public at risk or in danger;
  - b. A situation could adversely affect the safe operation or cause damage to the facility; or
  - c. A situation could result in a release of chemical or radioactive effluents to the environment above regulatory requirements or approvals.
  - d. To clarify work instructions or to propose additional controls
2. Ensure the work/activity is in, or placed in a safe condition and immediately notify supervision/management and affected workers when you stop work or decline to perform an activity.
3. Resolve any issues that have resulted in an employee stopping work or an activity.
4. It is the desired outcome of ANY Stop Work Intervention that the identified safety concern(s) has been addressed to the satisfaction of all involved employees prior to the resumption of work. Additional investigation or follow-ups may be required to identify and address root causes.