LOUISIANA PUBLIC SERVICE COMMISSION

CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AS A COMMON CARRIER OF SPECIAL COMMODITIES OVER IRREGULAR ROUTES

<u>NO. 8019</u>

A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY IS HEREBY GRANTED TO <u>WELLSCO FIELD SERVICES, LLC</u> whose office or place of business is at <u>EUNICE, LOUISIANA</u> authorizing operations in Louisiana intrastate commerce as a COMMON CARRIER OF WASTE OVER IRREGULAR ROUTES by motor vehicle.

Transportation of non-hazardous oilfield waste, statewide.

(Issued pursuant to Order No. T-33841 dated January 26, 2016. Except for cause beyond control, nonoperation of an authority for a period of six (6) months could lead to its cancellation pursuant to La. R.S. 45:166, Paragraphs B and C.)

Said <u>WELLSCO FIELD SERVICES, LLC</u> shall perform such operations under tariffs now or hereafter filed with the Commission and in compliance with all laws and rules and regulations of the Commission bearing thereon.

WITNESS THE SIGNATURE AND SEAL OF THE COMMISSION AT BATON ROUGE, LOUISIANA, ON THIS 26TH DAY OF APRIL 2016.

LOUISIANA PUBLIC SERVICE COMMISSION



EVE KAHAO GONZALEZ SECRETARY

<u>/S/ CLYDE C. HOLLOWAY</u> DISTRICT IV CHAIRMAN CLYDE C. HOLLOWAY

<u>S/SCOTT A. ANGELLE</u> DISTRICT II VICE CHAIRMAN SCOTT A. ANGELLE

<u>/S/ FOSTER L. CAMPBELL</u> DISTRICT V COMMISSIONER FOSTER L. CAMPBELL

<u>/S/ LAMBERT C. BOISSIERE</u> DISTRICT III COMMISSIONER LAMBERT C. BOISSIERE, III

<u>/S/ ERIC F. SKRMETTA</u> DISTRICT I COMMISSIONER ERIC F. SKRMETTA



WAYNE CHRISTIAN, CHAIRMAN Christi Craddick, Commissioner Jim Wright, Commissioner



DANNY SORRELLS Assistant Executive Director Director, Oil and Gas Division Paul Dubois Assistant Director, Technical Permitting

RAILROAD COMMISSION OF TEXAS OIL AND GAS DIVISION

June 10, 2022

455-19 TANNER SERVICES LLC PO BOX 1434 EUNICE LA 70535

Re: PERMIT ISSUED Waste Haulers Permit - Amendment WHP No. 6620 Expiration Date: May 31, 2023

The above-referenced Amendment Application, received on May 26, 2022, is complete, and the permit has been issued. The application contains information addressing each requirement necessary for the final review, and all requested vehicles, facilities, and wells have been added to the permit.

For questions, contact <u>Waste Haulers Permit@rrc.texas.gov</u> and reference **WHP No. 6620** in the email subject and body.

Christine Peters, Manager Environmental Permits and Support Technical Permitting

cc: RRC District 03, Houston



OIL AND GAS WASTE HAULER'S PERMIT (To be completed by the Commission)

Is hereby Issued to TANNER SERVICES LLC

Permit No. 6620 subject to the conditions below.

PERMIT CONDITIONS

- A. This permit authority is limited to the hauling, handling and disposal of oil and gas waste off a lease, unit, or other oil and gas property.
- B. This permit authorizes the permitted hauler to dispose of cil and gas waste only at the following disposal/injection systems:
 - Commission-permitted disposal/injection systems for which a Form WH-3 has been submitted and which are listed on Permit Attachment B (Approved Disposal/Injection Systems).
 - disposal systems operated under authority of a minor permit issued by the Commission; and
 - disposal systems permitted by another state agency or another state provided the Commission has granted separate authorization for the disposal.
- C. Each vehicle must be marked on both sides and in the rear with the permitted hauler's name (exactly as shown on the P-5 Organization Report) and permit number in characters not less than three inches high.
- D. This permit authorizes the permitted hauler to use only those vehicles shown on the Commission-issued listing of approved vehicles, Permit Attachment A (Waste Hauler Vehicle Identification).
- E. Each vehicle must carry a copy of this permit along with a copy of those parts of Permit Attachment A (Waste Hauler Vehicle Identification) and Permit Attachment B (Approved Disposal/Injection Systems) that are relevant to that vehicle's activities.
- F. Each vehicle must be operated and maintained in such a manner as to prevent spillage, leakage, or other escape of oil and gas waste during transportation.
- G. The permitted hauler must make each vehicle available for inspection upon request by Commission personnel.
- H. The permitted hauler must compile and keep current a list of all persons by whom the permitted hauler is hired to haul and dispose of oil and gas waste and furnish such list to the Commission upon request.
- The permitted hauler must adequately train all drivers to ensure compliance with Commission rules, including record keeping
 requirements, and adherence to proper emergency response and notification procedures.
- J. The permitted hauler must keep a DAILY record of the oil and gas waste hauling operations of each approved vehicle. The daily record, signed and dated by the vehicle driver, must be kept open for Commission inspection and must contain the following information:
 - 1. Identity of the property from which the oil and gas waste is hauled (operator name, lease name and number or other facility name or number, and county, and
 - 2. Type and volume of oil and gas waste received by the hauler at the property where it was generated;
 - 3. Identity of the disposal system to which the oil and gas waste is delivered (operator name, lease name and number or system name, well number or system permit number, and county); and
 - 4. Type and volume of oil and gas waste transported and delivered to the disposal system.
- K. This permit is not transferable without the consent of the Commission.
- L. This permit expires on ______ May 31, 2023 _____. This permit, unless suspended or revoked for cause shown, will remain valid until the expiration date.

Environmental Permits and Support RRC Contact

Director of Environmental Services

June 10, 2022 Date of Permit Issuance (512) 463-<u>3480</u>____

RAILROAD COMMISSION OF TEXAS OIL AND GAS DIVISION P. O. BOX 12967 AUSTIN, TX 78711-2967

OIL AND GAS WASTE HAULER VEHICLE IDENTIFICATION

PERMIT ATTACHMENT A

Page 1 of 1

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Hauler Name

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TANNER SERVICES LLC

Permit No.	Permit Date	Expiration Date
6620	June 10, 2022	May 31, 2023

A COPY OF THE PART OF THIS LISTING RELEVANT TO THAT VEHICLES ACTIVITIES MUST BE CARRIED IN EACH VEHICLE SUBJECT TO THIS PERMIT

Vehicle: 1998	FORD DUMP	VIN: 1FDYZ96X2WVA40556	Plate No. P184932
Vehicle: 2003	MACK DUMP	VIN: 1M2P267C63M066962	Plate No. P192143
Vehicle: 2005	MACK DUMP	VIN: 1M2AG11C85M024525	Plate No. P214015
Vehicie: 2007	MACK DUMP	VIN: 1M2AG11C27M052288	Plate No. P184934
Vehicle: 2007	MACK DUMP	VIN: 1M2AG11C07M052887	Plate No. P184935
Vehicle: 2002	MACK DUMP	VIN: 1M2P267C22M064141	Plate No. P184936
Vehicle: 1999	MACK DUMP	VIN: 1M2AD38C2XW008337	Plate No. P184937
Vehicle: 2003	MACK DUMP	VIN: 1M2P267C23M066960	Plate No. P192142
Vehicle: 2001	MACK DUMP	VIN: 1M2P324C21M056565	Plate No. P194572
Vehicle: 2004	MACK DUMP	VIN: 1M2AG11C54M011522	Plate No. P219608
Vehicle: 2000	STERLING DUMP	VIN: 2FZNNWDBOYAB17055	Plate No. P192774
Vehicle: 1999	STERLING DUMP	VIN: 2FZNNWYB1XA982168	Plate No. P184933
Vehicle: 2000	STERLING DUMP	VIN: 2FZNNWYB5YAB42897	Plate No. P194573
Vehicle: 1999	STERLING DUMP	VIN: 2FZNNWEB4XAB22238	Plate No. P210726
Vehicle: 1999	MACK DUMP	VIN: VG6BA09BOYB702177	Plate No. B614513
Vehicle: 1991	MACK ROLLOFF	VIN: 1M2P141C2MM010017	Plate No. P210725
Vehicle: 1970	LUFKIN ROLLOFF	VIN: 31239	Plate No. L355719
Vehicle: 2001	DRAGON TRAILER	VIN: 1UNST41241L023500	Plate No. L315786
Vehicle: 1980	ROADMASTER TRAILER	VIN: \$3065	Plate No. L315792
Vehicle: 2007	DRAGON DUMP TRAIL	VIN: 1UNSD32207C053205	Plate No. L273370
Vehicle: 2007	DRAGON DUMP TRAIL	VIN: 1UNSD32227C053206	Plate No. L273369
Vehicle: 2009	DRATON DUMP TRAIL	VIN: 1UNSD302257C053221	Plate No. L355661
Vehicle: 2009	DRAGON DUMP TRLR	VIN: 1UNSD30257C053221	Plate No. J886364
Vehicle: 2008	DRAGON VAC TRLR	VIN: 1UNST422X8L068865	Plate No. L92347
Vehicle: 2008	DRAGON VAC TRLR	VIN: 1UNST42238L067867	Plate No. L923049
Vehicle: 2006	SHOP VAC TRLR	VIN: HPTR10506	Plate No. L993283
Vehicle: 2007	DRAGON VAC TRLR	VIN: 1UNST42227L052923	Plate No. L923048
Vehicle: 2008	DRAGON VAC TRLR	VIN: 1UNST42238L064161	Plate No. J705342
Vehicle: 2007	DRAGON DUMP TRLR	VIN: 1UNSD28287C053258	Plate No. L315821

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PERMIT ATTACHMENT B

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RAILROAD COMMISSION OF TEXAS OIL AND GAS DIVISION P. O. BOX 12967 AUSTIN, TX 78711-2967

OIL AND GAS WASTE HAULER APPROVED DISPOSAL INJECTION SYSTEMS

Hauler Name TANNER SERVICES LLC

Permit No.Permit Date6620June 10, 2022

Expiration Date May 31, 2023

A COPY OF THE PART OF THIS LISTING RELEVANT TO THAT VEHICLES ACTIVITIES MUST BE CARRIED IN EACH VEHICLE SUBJECT TO THIS PERMIT

		Injection/Disposal Wells
JIC No. 000112686	Well No. 1	Current Operator: MILESTONE ENVIRO SERVICES, LLC (567101)
JIC No. 000113120	Well No. 1	Current Operator: MILESTONE ENVIRO SERVICES, LLC (567101)
JIC No. 000113277	Well No. 2	Current Operator: MILESTONE ENVIRO SERVICES, LLC (567101)
JIC No. 000099114	Well No. 1D	Current Operator: REPUBLIC EES, LLC (702639)
JIC No. 000115426	Well No. 1	Current Operator: REPUBLIC EES, LLC (702639)
JIC No. 000117688	Well No. 1	Current Operator: REPUBLIC EES, LLC (702639)
JIC No. 000102008	Well No. 3D	Current Operator: SABINE ENVIRONMENTAL SVCS, LLC (742132)
JIC No. 000103352	Well No. 4	Current Operator: SABINE ENVIRONMENTAL SVCS, LLC (742132)
JIC No. 000086924	Well No. T 2SS	Current Operator: TRINITY ENVIRO SERVICES I,L.L.C. (869983)
JIC No. 000089964	Well No. 1A	Current Operator: TRINITY ENVIRO SERVICES I,L.L.C. (869983)
JIC No. 000098091	Well No. 3	Current Operator: TRINITY ENVIRO SERVICES I,L.L.C. (869983)
JIC No. 000105736	Well No. 1	Current Operator: WM ENERGY SVCS OF TX, LLC (935432)

	Surface Disposal Fa	cilities	· · · · · · · · · · · · · · · · · · ·
	EAGLE FORD RECLAMATION CO, LLC (238312) STF-0053, P011844, P011845, P011846, P011847, P01202 P013172, P013173, P013174, P013175, P013176, P013177 P013183, P013184, P013185, P013186, P013187, P013188	28, P012 7, P0131	
•	MILESTONE ENVIRO SERVICES, LLC (567101) P012349, P012350	Facility:	Angelo SWD Lease, Commercial SWD Facility
Current Operator:	MILESTONE ENVIRO SERVICES, LLC (567101)	Facility:	Dusek SWD Lease, Dusek SWD Comm Rankin Fac - North Side
Permit Numbers:	P012542, P012543		
Current Operator: Permit Numbers:	MILESTONE ENVIRO SERVICES, LLC (567101)	Facility:	Stanton SWD Lease, Comm Injection Facility
Current Operator:	MILESTONE ENVIRO SERVICES, LLC (567101)	Facility:	Upton 349 South E&P Separation Disposal STF Facility
Permit Numbers:	STF-0130, P012628, P012629, P012630A, P012630B, P012 P012631B, P012764, P012784A, P012784B, P012784C, P0		
•			Big Lake Facility
Permit Numbers:	STF-0125, P012544A, P012544B, P012544C, P012545, P0 P012548D, P012549A, P012549B, P012549C, P012549D, F		
Current Operator:	PETRO WASTE ENVIRONMENTAL LP (660029)	Facility:	Deep Six SWD Lease, Deep Six O/G Wst Sprtn STF Facility
Permit Numbers:	STF-0106, P012321, P012322, P012323, P012328, P01235 P012612B, P012612C, P012747, P012748A, P012748B, P0 P012748H		
•	PETRO WASTE ENVIRONMENTAL LP (660029) STF-0062, P011994, P011996, P011997, P011998A, P0119 P013108, P013109, P013110, P013111, P013112, P013113	98B, PO	
•	PETRO WASTE ENVIRONMENTAL LP (660029) STF-0082, R9 08-1501, P012126, P012127, P012128, P012 P012135, P012136A, P012136B, P012136C, P012136D, P0	2129, PO	

RAILROAD COMMISSION OF TEXAS OIL AND GAS DIVISION P. O. BOX 12967 AUSTIN, TX 78711-2967

OIL AND GAS WASTE HAULER APPROVED DISPOSAL INJECTION SYSTEMS

PERMIT ATTACHMENT B

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Hauler Name TANNER SERVICES LLC

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Permit No.Permit Date6620June 10, 2022

Expiration Date May 31, 2023

A COPY OF THE PART OF THIS LISTING RELEVANT TO THAT VEHICLES ACTIVITIES MUST BE CARRIED IN EACH VEHICLE SUBJECT TO THIS PERMIT

· · · · ·	Surface Disposal Facilities		
•	PETRO WASTE ENVIRONMENTAL LP (660029) STF-0101, P012235, P012236, P012237, P012238, P0125	Facility: Orla Landfill Surface Disposal STF Facility 28, P012529, P012532, P012578, P012579	
Current Operator:	R360 ENV SOLUTIONS OF TX, LLC (687718)	Facility: R360 Wishbone Ranch O/G Waste Separation Disposal STF Facility	
Permit Numbers:	STF-0055, P011891, P011892, P011893, P011894, P0118 P011901, P011902, P012106, P012107, P012220, P01222 P012552, P012568, P012569, P012756, P012757, P01275	21, P012222, P012223, P012224, P012550, P012551,	
	REPUBLIC EES, LLC (702639) STF-0033, R9 01-1101, P011669, P011670A, P011670B, I P012540, P012559, P012560, P012561, P012562, P01256	Facility: Los Angeles TRD STF Facility P011953, P011954, P011955, P012537, P012538, P012539, 33, P013156	
Current Operator:	REPUBLIC EES, LLC (702639)	Facility: Odessa Treatment Recovery Disposal (TRD) STF Facility	
Permit Numbers:	STF-0089, R9 08-3832, P011308A, P011308B, P011308C P011430, P011431, P011558, P011563, P011704, P01208 P012316C	, P011308D, P011426B, P011427, P011428, P011429, 80, P012315A, P012315B, P012315C, P012316A, P012316B,	
Current Operator:	REPUBLIC EES, LLC (702639)	Facility: Republic Services Reeves Co Reclamation / Disposal / STF Facility	
Permit Numbers:	STF-0099, R9 08-1405A, P012250, P012302, P012422, P0	012423, P012424, P012425, P012426	
Current Operator:	WM ENERGY SVCS OF TX, LLC (935432)	Facility: WM ES TX SSWD O/G Wst Sprtn Reclamation STF Facility	
Permit Numbers:	STF-0133, R9 08-1804, P012670, P012671		

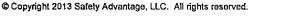
General Waste Management	Page 1
Tanner Services LLC. Master Safety & Health Program	07/13

1. Scope of program

- 1.1. Tanner Services LLC. has established this General Waste Management program with regard to the following types of operations:
 - 1.1.1. Estimation of the amount and type of waste that will be produced on each job site prior to work;
 - 1.1.2. Coordination with project or site owner on disposal of waste;
 - 1.1.3. Assignment of responsibilities for proper waste disposal;
 - 1.1.4. Safe work practices;
 - 1.1.5. Classification of waste;
 - 1.1.6. Training

2. Estimation of waste

- 2.1. During the bid process Tanner Services LLC. will estimate the amount of waste that is to be generated so that available containers can be obtained for proper disposal.
- 2.2. Tanner Services LLC. will coordinate with the project or site owner to determine if the waste can be disposed of onsite and containers are available.
- 2.3. Off site waste disposal will be coordinated with project or site management to obtain proper permits for removal.
- 2.4. The responsibility of waste removal will be assigned to an employee of Tanner Services LLC., who will be on the jobsite for the duration of the work.
- 2.5. Containers for the waste will be made of a leak proof material with covers to prevent the accidental runoff from rain water and contamination of the environment.
- 2.6. Waste will be classified and separated by like materials for recycling. Metal, wood, general refuse and oily materials will be separated as according to the project or site management plan that is in place.
- 2.7. Project related waste will be stored and maintained in an orderly fashion. Metal refuse will be stored in a way that sharp edges shall be guarded against accidental contact with employees.





General Waste Management	Page 2
Tanner Services LLC. Master Safety & Health Program	07/13

- 2.8. Employees of Tanner Services LLC. will be instructed on the proper disposal method of waste. General instruction on disposal of non-hazardous waste, trash, or scrap metals. If waste is classified as hazardous then additional training is required.
- 2.9. Personal protective equipment such as leather gloves will be worn for protection.

Cargo Securement	Page 1
Tanner Services LLC. Master Safety & Health Program	07/19

Purpose

The purpose of this program is to protect employees and property from harm and damage by ensuring that cargo carried by a motor vehicle is secured in accordance with this program when the vehicle is operated on a highway.

Policy

This applies to all Tanner Services vehicles with a gross weight or gross combination weight rating in excess of 10,000 lb.

Procedure

Cargo must be contained or secured so that it may not leak, spill, blow, fall from, fall through or otherwise become dislodged from the vehicle. The cargo must not swing or shift upon or within the vehicle to such an extent that the vehicle's stability is adversely affected.

Vehicle Structures and Anchor Points

Vehicle structures, floors, walls, decks, tie down anchor points, headboards, bulkheads, stakes, posts, etc. used to contain or secure cargo, must be strong enough to withstand the forces which occur when the vehicle is subject to sudden stops. These must be in good working order, with no obvious damage, defects, distress, or weakened parts.

Securement Method

The securement method chosen must be appropriate for the size, shape, strength and characteristics of the cargo being transported. Articles of cargo, including unitized articles, and articles stacked one upon another, must have sufficient structural integrity to withstand the forces of loading, securement and transportation.

All securing devices must be used in accordance with the manufacturer's instructions.

Cheater pipes on cargo binders must be used with extreme care to avoid injury.

Tie downs

A tie downs must be designed, constructed, and maintained so that the driver of the vehicle can tighten it. Each tie down must be attached and secured in a manner that prevents it from loosening, unfastening, opening or releasing while the vehicle is in transit.

All components of a tie down must be in proper working order, with no knots and no obvious damage, distress, weakened parts.



All tie downs and other components of a cargo securement system must be located inboard of the rub rails when a platform body is equipped with such a device. This requirement does not apply when the width of the load extends to or beyond the rub rails.

Edge protection must be used where a tie down would be subject to abrasion or cutting at the point where it touches an article of cargo. The edge protection must also resist abrasion, cutting and crushing.

Securement System Strength Rating

The Working Load Limit of a tie down is the lowest working load limit of any of its components, or the working load limit of the anchor points to which it is attached, whichever is least. In the case of a synthetic webbing tie down, the working load limit is the working load limit of a tie down assembly or the anchor point to which it is attached whichever is least.

A component or assembly marked by its manufacturer with a numeric working load limit or a recognized standard is considered to have a working load limit equal to the marked value.

A component or assembly which is unmarked by its manufacturer will be considered to have a working load limit of the lowest grade or classification for its size.

Cargo Securement Requirements

Cargo that is fully contained with a vehicle of adequate strength is considered adequate. All other cargo must be immobilized on or within a vehicle by appropriate means, secured by tie downs, or a combination of these, to prevent shifting and tipping.

Articles of cargo placed beside each other and secured by transverse indirect tie downs must either:

Be placed in direct contact with each other, or

A means must be provided to prevent them from shifting towards each other while in transit.

Chocks, wedges, a cradle or other equivalent means that prevent rolling, must restrain articles of cargo with a tendency to roll. The means of preventing rolling must not be capable of becoming unintentionally unfastened or loose while the vehicle is in transit.

The aggregate working load limit of all tie downs securing an article or group of articles must not be less than half the weight of the article or articles secured.

Minimum Number Tie downs Required

When an individual article is not blocked or immobilized to prevent movement in the forward direction by a headboard, bulkhead, other cargo which is also immobilized, or other appropriate blocking device, it must be secured by at least:

One tie down for articles up to 5 ft in length and up to 1100 lb in weight Two tie downs if the article is:

- ► Up to 5 ft in length but over 1100 lb in weight
- ► Longer than 5 ft but less than or equal to 10 ft in length

► Longer than 10 ft, with one additional tie down for each 10 ft of article length, or part thereof, beyond the first 10 ft of length.

When an individual article is blocked or immobilized to prevent movement in the forward direction by a headboard, bulkhead, other articles which are adequately secured or by an appropriate blocking or immobilizing method, it must be secured by at least one tie down for every 10 feet of article length, or fraction thereof.

Inspection of Securement Systems

The driver of the vehicle must inspect the cargo and its securing devices within the first 50 miles after beginning a trip, and must make any adjustments to the cargo or securing devices as may be necessary, including adding additional securing devices, to maintain the security of the cargo.

The driver must re-examine the cargo and its securing devices periodically during the trip, and make any adjustments to the cargo or securing devices as may be necessary, including adding additional securing devices, to maintain the security of the cargo. A periodic reexamination and any necessary adjustments must be made:

When the duty status of the driver changes

After the vehicle has been driven for 3 hours or 150 miles, whichever occurs first.

Trailers

The following tables provide the working strengths of various tie-down materials.

Tab	ble 1.1
C	hain
Size	Working Load Limit
1⁄4 in	1300 lb
5	1900 lb

/16 in	
3 /8 in	2650 lb
7 /16 in	1590 lb
1½ in	2040 lb
5 /8 in	3130 lb

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Table 1.2

Synthetic Webbing		
Width	Working Load Limit	
1 ³ /4 in	1750 lb	
2 in	2000 lb	
3 in	3000 lb	
4 in	4000 lb	

Safe Loading	Page 1
Tanner Services LLC. Master Safety & Health Program	07/19

Purpose

The purpose of these procedures is to protect employees and property from harm or damage by preventing unsafe practices during loading and securing operations.

Procedure

Drivers are responsible for ensuring that safe loading practices are followed according to 49 CFR Part 392.9

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- Drivers shall ensure that the cargo is properly distributed and adequately secured to the vehicle.
- The driver shall ensure that the vehicle's tailgate, tailboards, tarpaulins, its spare tire and other equipment used in its operation, and the means of fastening the cargo are properly secured.
- The driver shall ensure that the cargo or any other object does not obscure the view ahead or to the right or to the left sides, interfere with the free movement of his/her arms or legs, prevent his/her free and ready access to accessories required for emergencies, or prevent free and ready exit of any person from the vehicle.
- The driver shall ensure that that liquid cargo is handled/loaded in a safe manner to where no spills occur.
- Except for vehicles with flat bed trailers, the vehicle must have sides, sideboards, or stakes, and a rear end gate, end board, or stakes. These devices must be strong enough and high enough to assure that cargo will not shift or fall from the vehicle.
- The vehicle must have tie down assemblies that meet the requirements of 49 CFR Part 393.102.
- Unauthorized or improper cheater pipes are prohibited from use for binding cargo to vehicles.
- Safe rigging and lifting practices shall be followed at all times.

Anyone who loads hazardous goods onto a company vehicle for transportation on public roadways must be trained in the transportation of hazardous goods and follow all applicable guidelines set forth by the Department of Transportation.

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Tanner Services, LLC

DRUG, ALCOHOL, AND CONTRABAND POLICY

Effective Date: 6/30/2015

Approved By:

<u>Rick Nini</u>

For the purpose of this policy "company" shall refer to: Tanner Services, LLC



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Tanner Services, LLC

1) PURPOSE

To ensure a safe, healthy, and productive work environment for the employees of the company, customers, and others on company or customer property. To protect company and customer property and assets, ensure efficient operations, and meet any specific requirements of customers. Company shall enforce this drug, alcohol, and contraband policy in a fashion consistent with the laws of the states in which the company employees' are employed.

2) **DEFINITIONS**

a) Company Personnel:

All company employees, agents, subcontractors or subcontractors' employees performing field operations work on company or customer property. This includes temporary and part-time personnel.

b) Property or Customers Property:

All real or tangible personal property, including facilities, buildings, vehicles, products and equipment, either owned or controlled by the company or its customers.

c) Prohibited Substances:

- Illicit or un-prescribed drugs, controlled substances and mood or mind-altering substances (for example: any synthetic derivative/product that produces a marijuana-type high and any herbal products not intended for human consumption);
- ii) Prescribed drugs used in a manner inconsistent with the prescription;
- iii) Alcoholic beverages;
- iv) Medical Marijuana/Recreational Marijuana The use of marijuana for medical or recreational purposes, even if permitted by state law, regulation or ordinance, will not be considered an acceptable explanation for a confirmed positive laboratory report for marijuana and will be reported by the Medical Review Officer (MRO) as a verified positive drug test for marijuana. The company will treat marijuana like they would alcohol; they are not required to tolerate individuals being under the influence while at work, or on customer property. The company will not permit or accommodate the use, consumption, possession, transfer, display, transportation, sale or growing of marijuana in the workplace.

d) Reasonable Suspicion:

A belief based on objective and articulable facts sufficient to lead a supervisor to suspect use of prohibited substances.

For the purposes of this section a *supervisor* is a company employee acting in an official supervisory capacity who has successfully completed drug and alcohol supervisor training as outlined in this policy.

e) Under the Influence:

- The presence of a prohibited substance or metabolites of a prohibited substance in body fluids above the cut-off level established by company's policy or other commonly accepted cut-off level;
- The presence of a prohibited substance that affects an individual in any detectable manner. The symptoms of influence may be, but are not limited to, slurred speech or difficulty in maintaining balance.

3) PROHIBITIONS

Unless specifically authorized in writing by the company and its customers, Tanner Services, LLC policy shall prohibit company personnel from the following:

- a) Using, possessing, selling, manufacturing, distributing, concealing or transporting on company or customer property any of the following items:
 - i) Any prohibited substance;
 - ii) Contraband, including firearms, ammunition, explosives, and weapons (except where in violation of state law);
 - iii) Illicit drug equipment or paraphernalia.
- b) Possessing or using prescription drugs or over-the-counter medication that may cause impairment, except when <u>all</u> of the following conditions have been met, while on company property (unless otherwise provided for under the American's with Disabilities Act):
 - i) Prescription drugs have been prescribed by a licensed physician for the person in possession of the drugs, and;
 - ii) The prescription is not expired and was filled by a licensed pharmacist for the person possessing the drugs, and;
 - iii) The individual notifies their supervisor that they will be in possession of, or using, impairment-causing prescription drugs or over-the-counter medication and appropriate steps are taken to accommodate the possibility of impairment, including but not limited to, removal from work for the period of possible impairment. Note: Discussions between the individual and their supervisor must be limited to the individual's ability to perform essential job functions.
- c) Being under the influence of prohibited substances while performing any work for the company or their customers.
- d) Switching, diluting or adulterating any urine, blood or other sample used for testing.
- e) Performing work for the company or their customers when an individual has tested positive or refused testing in any employment-related test.

4) ROLES AND RESPONSIBILITIES

a) Designated Employee Representative (DER):

Designated Employee Representative (DER) should be an employee within the Health, Safety, Security and Environment (HSSE) department who is authorized to receive test results and other communications, take immediate action to remove workers from a company or customer's jobsite and make required decisions in the testing and evaluation process. Specific roles and responsibilities assigned to a DER should include, at a minimum, the following:

- i) Select and contract with a laboratory or service provider, based on pre-determined criteria, to help implement all or part of the Drug, Alcohol and Contraband Program.
- ii) Receive general correspondence, newsletter, and announcements from laboratories and service providers.
- iii) Coordinate reasonable suspicion training for all supervisors and ensure they have signed a document acknowledging completion of the training.
- iv) Schedule and coordinate drug and alcohol testing activities.
- v) Maintain confidential files for the Drug, Alcohol and Contraband Program.
- vi) Monitor non-negative, positive, or invalid test results and results supporting that the specimens have been adulterated or substituted to determine appropriate actions.

b) Medical Review Officer (MRO):

An MRO is a person who is a licensed physician who is knowledgeable about substance abuse problems, medical and legal issues, and clinical and occupational medicine. An MRO is responsible for receiving and reviewing laboratory test results and evaluating medical explanations for certain drug test results. Roles and responsibilities assigned to an MRO typically include the following:

- i) Serve as an independent party to oversee the accuracy and integrity of the company Drug and Alcohol Testing process (DOT and NON-DOT).
- ii) Review appropriate copies of chain-of-custody forms to determine if problems exist
- iii) Conduct verification interviews with workers for non-negative drug test results or results indicating that the specimen has been adulterated or substituted.
- iv) Interpret drug test results to determine if a legitimate medical explanation exists for a laboratory's confirmed positive, an invalid test result or adulterated or substituted specimen.
- Immediately report verified positive or invalid results, results requiring immediate collection under direct observation, adulterated or substituted specimens, and other refusals to test to appropriate personnel.
- vi) Report written drug test results in a confidential manner to appropriate personnel authorized to receive such information

5) SEARCHES AND INSPECTIONS

Searches and inspections may be:

- a) Conducted on company or customer property, at any time, by company or customer supervisors or authorized search and inspection specialists including scent trained animals.
- b) Unannounced searches or inspections of company or customer personnel and their property, which may include, but is not limited to: wallets, purses, lockers, baggage, offices, desks, toolboxes, clothing and vehicles.
- c) Employees have the right to refuse being searched or having their personal effects searched or to cooperate in the requested tests; however, refusal to allow such searches or to cooperate in such lawfully permitted searches by any employee will be cause for disciplinary action, up to and including immediate termination.

6) TESTING REQUIREMENTS

Drug and alcohol testing must meet the requirements of customers:

a) Pre-Access Testing

- i) All company personnel are subject to customer pre-access testing which may mandate that the employee(s) receive a negative result on a drug and/or alcohol test within a customer's specific required amount of time preceding the employee's first access to customer property. Note: Some customers may waive this requirement if employee(s) are currently active in a random testing pool. Annual drug and alcohol testing is also required by specific customers. Upon customer's request, company shall so certify in writing.
- ii) Company will provide no information to customers identifying individuals who have positive pre-access tests.

b) Post-Incident Testing

- i) Company shall remove individuals from customer property and surrender their site credentials to the customers IF it is determined by the company or customers:
 - (1) from the best information available, immediately following a work-related incident

- (2) the performance of one or more company personnel contributed to the incident or cannot be completely discounted as a contributing factor to the incident
- ii) An individual so removed will be allowed to return to work on customer property only after.
 - (1) company conducts alcohol and drug testing on the individual as soon as possible following the individual's removal from the site, and
 - (2) the company certifies all of the following in writing:
 - (a) the test identification number
 - (b) the individual's 4 digit identifying number
 - (c) the test date and time, and
 - (d) a negative test result
 - (3) On the written certification the company will include a consent signed by the individual permitting disclosure to customers of the test result.
- iii) If alcohol testing occurs more than two (2) hours from the time of the incident, a written reason for the delay may be required by customers.
- iv) If drug testing cannot be completed within 32 hours, a written reason why the testing could not be completed may be required by customers.
- v) If an employee who is subject to post-accident testing is conscious, able to urinate normally (in the opinion of a medical professional) and refuses to be tested, that employee shall be removed from their position and shall be subject to discipline.

For the purpose of this part "incident" means:

- (1) An actual event that caused:
 - (a) Injury requiring medical treatment beyond first aid
 - (b) Environmental impact beyond a small immediate area to:
 - (i) soil/ground-water
 - (ii) marine life, or
 - (iii) impact to nearby habitat, wildlife, livestock, crops or fisheries
 - (c) Process Safety events as determined by the responsible company or customer Supervisor
 - (d) Property damage as determined by the responsible company or customer Supervisor
 - (e) Motor vehicle accident (the operator of the vehicle or other individuals where there is evidence to support that they may have contributed to the incident)

Or

- (f) An event that had potential for
 - (i) Serious injury/fatality
 - (ii) Environmental impact beyond Company or Customer Premises
 - (iii) Property damage as determined by the responsible Company or Customer Supervisor
- (2) The Company may decide not to conduct a post-accident drug and/or alcohol test if:
 - (a) The best information immediately available after the accident indicates that the employee's performance could not have contributed to the accident, or

(b) Because of the time between the performance and the accident, it is not likely that a drug and/or alcohol test would reveal whether performance was affected by drug and/or alcohol use.

c) Reasonable Suspicion Testing

- i) Upon reasonable suspicion of company or customers that company personnel is under the influence of a prohibited substance while on company or customer property (refer to Attachment D as a guide to assess whether there is reasonable suspicion for requesting a test), company shall remove the individual(s) from customer property and surrender their site credentials to the customers.
- ii) An individual removed from company or customer property for Reasonable Suspicion will be allowed to return to work on company or customer property only after:
 - (1) Company conducts alcohol and drug testing on the individual as soon as possible following the individual's removal from the site, and
 - (2) Company certifies all of the following in writing:
 - (a) the test identification number
 - (b) the individual's 4 digit identifying number
 - (c) the test date and time, and
 - (d) a negative test result
 - (3) On that written certification the company will include a consent signed by the individual permitting disclosure to customers of the test result. (Attachment D: example check list)

d) Random Testing

If specific customers require random drug and/or alcohol testing then the following guidelines will be followed:

- i) Unless otherwise specified by a specific customer, company personnel shall be subject to:
 - (1) Un-announced random testing
 - (2) Performed on a quarterly basis (at a minimum)
 - (3) That yields a compliance of an annualized rate as determined by the customer operator
- ii) If required by the specific customer, a breath alcohol test will be given at the same time as the drug test.
- iii) Upon notification of being selected for a drug and/or alcohol test, company personnel must report to the collection site within 30 minutes, plus travel time.
- iv) Failure to report to the collection site, refusal to test, or adulterating a specimen is considered the same as a positive test and the individual could be denied access to company or customer premises.

e) Wall-to-Wall Testing

Company personnel may be subject to:

- i. Un-announced en masse drug and alcohol testing.
- ii. Such tests are scheduled at the sole discretion of the customers. This includes the determination of the scope and the timing of such testing.
- iii. Such a group may include all members of the named group on site at the determined time or time period and <u>shall not</u> be determined in terms of named individuals.

iv. Such groups may include, but are not limited to, all company personnel on site, or by shift, by crew, by location, by craft, by company or by another similar category, including a random selection based on site access records.

7) TESTING PROTOCOL

a) Laboratory:

Laboratories selected for employee drug testing must be evaluated against the following criteria to help ensure that results obtained from these laboratories will be reliable.

- i) Laboratories must be certified according to local laws and regulations or industry practices for providing accurate and reliable services.
 - (1) Urine samples must be analyzed by a laboratory that has been certified by the Department of Health and Human Services under the National Laboratory Certification Program or Substance Abuse and Mental Health Services Administration (SAMHSA)
 - (2) Hair follicle specimens must be analyzed by a Clinical Laboratory Improvement Program (CLIP) accredited laboratory. Note: some customers will not allow hair testing as a means to meet their requirements.
- ii) Special handling and chain-of-custody procedures must:
 - (1) be written and available, and
 - (2) discuss inspecting, documenting, storing, and transporting specimens
- iii) Laboratory management and staff must have appropriate education, experience, and qualifications.
- iv) Quality-Control procedures must be:
 - (1) written and available, and
 - (2) include testing blank and spiked samples for verification
- v) Laboratories must be able to provide technical assistance and advice concerning drug and alcohol testing.
- vi) Sample supplies appropriate to the type of specimen being collected or the test run must be readily available from the laboratory.
- vii) Laboratories must be able to generate confidential and accurate reports.

b) Collection Personnel:

- i) <u>Urine</u> specimens must be collected by personnel who have been trained and certified according to the SAMHSA/DHHS guidelines which includes:
 - (1) basic information,
 - (2) qualification training,
 - (3) initial proficiency demonstration,
 - (4) refresher training, and
 - (5) error correction training
- ii) <u>Hair</u> follicle specimens must be collected by personnel that have documentation supporting that they have been trained in:
 - (1) equipment and procedures used in gathering and collecting hair follicle specimens
 - (2) preparing chain-of-custody forms
 - (3) preparing the specimen for shipment, and

- (4) shipping the sample to an approved laboratory Note: Hair testing will only be utilized for customer compliance when the customer has authorized this testing method
- iii) <u>Breath/Saliva</u> testing shall be conducted utilizing devices approved by the National Highway Traffic Safety Administration or equivalent. All collection and testing procedures shall mirror as closely as possible to US DOT (Department of Transportation) protocols.
- c) Alcohol:

Personnel that have a blood alcohol concentration (BAC) level:

- Personnel that have a blood alcohol concentration (BAC) level equal to or greater than 0.02 during pre-employment confirmation testing are considered to be under the influence of alcohol and will not be eligible to perform work for certain customers.
- Personnel that have a blood alcohol concentration (BAC) level equal to 0.02 and less than 0.04 must be removed from performing safety or security-sensitive activities until the BAC level is below 0.02 (unless <u>Attachment A</u> specifies a more stringent level)
- iii) Personnel that have a blood alcohol concentration (BAC) level equal to or greater than 0.04 have violated the Drug, Alcohol and Contraband Program and are subject to disciplinary action up to and including termination (unless <u>Attachment A</u> specifies a more stringent level)

8) NON-COMPLIANCE

Company personnel will be found to be in non-compliance if they:

- · Violate any portion of this policy or the customer's policy, or
- Refuse to cooperate with the searches and tests included in this policy or the customer's policy

If found to be in non-compliance:

- The company personnel found to be in non-compliance shall be <u>permanently</u> removed by the company from customer property and from performing work for the customer.
- Company must immediately notify customers that the individual has become disqualified from performing work for them.
- Company will immediately review with customers the nature of the work previously performed by the individual.
- At customer's request, company shall, at its sole cost and risk, inspect all work in which the individual may have participated and submit a written report to the customer that documents the inspection and any findings and the actions taken to assure all deficiencies have been corrected.

9) SUBSTANCE ABUSE AWARENESS

Company warrants that company personnel performing work have each been fully informed of the requirements of this policy and customer's policy. Before beginning work on company or customer property, all company personnel must sign a written certification that they have been so informed and agree to be bound by the requirements. See Attachment B and Attachment C.

10) SPECIAL PROVISIONS - CUSTOMER-APPROVED CONSORTIUM

The following will be recognized as satisfying some customer's pre-access and random testing requirements:

- Enrollment in and maintenance of an "active status" in a customer-approved consortium that:
 Desuites are enrollment testing and
 - o Requires pre-enrollment testing and

 Continuously subjects active members to random drug and/or alcohol testing at an annual effective rate of at least 50% (unless otherwise specified by DOT)

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11) APPLICABLE LAWS

Company shall comply with all applicable Federal, State, and local drug and alcohol related laws and regulations applicable to company personnel (e.g., DOT regulations, Department of Defense (DOD) Drug-Free Workplace Policy, Drug-Free Workplace Act of 1988, etc.).

12) SUPERVISOR TRAINING

Company shall provide training regarding this policy to all affected company personnel, to include recognition of performance indicators of probable drug and/or alcohol use and on its effects and consequences to personal health, safety and the workplace. Each supervisor responsible for determining whether an employee must be tested based on reasonable suspicion shall receive at least one 60-minute training session on the specific, contemporaneous, physical, behavioral, and performance indicators of probable drug and alcohol use. Records of trained individuals (including name and date) must be maintained by the company and available to customers upon request. See Attachment C

13) AUDIT

- a) Company shall keep records required by this policy available for inspection by customers during the period that the company is performing work for customers and for a period of (3) years after company ceases to perform work for that customer.
 - i) Such records include but are not limited to:
 - (1) laboratory copies of test results
 - (2) chain of custody forms
 - (3) copies of signed acknowledge/consent forms from this policy
 - ii) Records can be stored electronically as long as they are accessible upon request.
- b) At their discretion, customers may perform unannounced audits of the company's alcohol and drug program to verify that the company's policy and its enforcement comply with these guidelines.
- c) At customer's request the company shall:
 - i) Provide separate lists of company personnel (including name and 4 digit identifying number) who were eligible for customers work on a date specified by customers
 - ii) Provide customers with the following information on each alcohol and drug test conducted for each company personnel identified by customers from those lists:
 - (1) Date of and type of test (e.g. random, pre-access) and;
 - (2) Laboratory chain-of-custody identification number and/or test number
- d) Upon submission by customers of a list, or lists, of 4 digit identifying numbers, chain-ofcustody ID numbers and test dates, the company shall obtain an agreement with any consortium, laboratory, or Medical Review Officer (MRO) providing drug and/or alcohol testing services for the company to ensure:
 - i) The consortium/laboratory will verify that the tests were conducted as represented, and
 - ii) The consortium/laboratory or company MRO will provide a sworn statement attesting whether or not each of the tests identified by the customer can be confirmed as negative

ATTACHMENT A -1

URINE NON-DOT DRUG AND ALCOHOL TESTING PROTOCOL:

***Drug testing should be a urine test that is collected by a certified collector and the specimen sent to a SAMHSA certified laboratory for analysis. Quick Screen/Rapid Test devices are not acceptable unless prior approval has been received, in writing, from your customer and a copy of that approval has been submitted to NCMS.

***Alcohol testing should be a breath test using a device that is listed on the DOT conforming products list. If a screening device (saliva) is utilized it must be listed on the DOT conforming products list. If the result is positive you will need to follow the waiting period guidelines of 15 minutes and then follow up with a confirmation test using a confirmation testing device. It is imperative that you follow these testing guidelines or your employees could be denied access or working for a customer. (If there are exemptions from these testing guidelines from your customer then a copy of that exemption should be submitted to NCMS.)

	NAME	DISA approved	d collection sites
	ADDRESS		
COLLECTION			
FACILITY	PHONE NUMBER	-	
	CONTACT PERSON		
	NAME	Clinical Referen	ce Lab
TERTING	ADDRESS	8433 Quivira Ro	ad
TESTING LABORATORY		Lenexa, KS 66215-2802	
	PHONE NUMBER	800-445-6917	
	NATIONALLY CERTIFIED? (YES/NO)	Yes	
MRO	MRO NAME	Dr. Randy Barne	ett/University Services
(Medical Review Officer)	MRO PHONE	215-637-6800	
	SUBSTANCE	SCREEN LEVEL	CONFIRMATION LEVEL
	COCAINE	150 100	
PHEN	CYCLIDINE (PCP)	25	25
MARIJUANA (THC)		20 10	
	OPIATES 2000 2000		2000
6-401	ETYLMORPHINE	10 10	
AMPHETAMINE	ES/METHAMPHETAMINES	300	250
	MDMA	250	200
1	MDA	250	200
	MDEA	250	200
BARBITURATES 300 100		100	
BEN	ZODIAZEPINES	300	100
N	IETHADONE	300	100
PR	OPOXYPHENE	300	200

METHAQUALONE	300	200	
ALCOHOL TESTING METHOD USED:	SCREEN LEVEL	CONFIRMATION LEVEL	
EBT and/or Saliva	0.02% BAC	0.04% BAC	

This form should only be completed if HAIR testing is an acceptable testing method per your customer(s).

ATTACHMENT A -2

HAIR FOLLICLE DRUG TESTING PROTOCOL:

***If Hair Follicle testing is an acceptable testing method per the customer you are working for then the use of a laboratory accredited under the Clinical Laboratory Improvement Program (CLIP) is required. Collections of the hair follicle should be performed by personnel with documentation showing they have training on collection techniques, transportation procedures and completion of chain of custody forms.

	NAME	
COLLECTION	ADDRESS	
FACILITY		
	PHONE NUMBER	-
	CONTACT PERSON	
- · · · · · · · · · · · · · · · · · · ·		

	NAME	
TEOTINO	ADDRESS	
TESTING LABORATORY		
	PHONE NUMBER	
	CLIP ACCREDITED? (YES/NO)	
MRO	MRO NAME	
(Medical Review Officer)	MRO PHONE	

SUBSTANCE	SCREEN LEVEL (pg/mg)	CONFIRMATION LEVEL (pg/mg)
COCAINE		
PHENCYCLIDINE (PCP)		
MARIJUANA (THC)		
OPIATES 6-ACETYLMORPHINE		
AMPHETAMINES/METHAMPHETAMINES MDMA MDA MDEA		
BARBITURATES		
BENZODIAZEPINES		
METHADONE		
PROPOXYPHENE		
ENTER ADDITIONAL DRUGS HERE		

ATTACHMENT B

Acknowledgement of drug and alcohol contraband policy receipt

I hereby acknowledge that I have been provided a copy of the <u>Tanner Services, LLC</u> drug/alcohol policy requirements. I understand that disciplinary action up to and including termination, will result if I violate this policy.

I also hereby authorize and consent to disclosure by <u>Tanner Services, LLC</u> and its agents, including, but not limited to, any collecting and testing agencies, of the drug and alcohol test results and any related information to customers of <u>Tanner Services, LLC</u> and its authorized agents, assigns, or representatives.

Employee Signature

Date

Employee Name (Typed or Printed)

Employee ID (4 digit identifier)

*** This consent form is for release of <u>NON-DOT</u> tests. Please follow <u>DOT</u> regulations if you choose to submit DOT test results in place of <u>non-dot</u> in order to meet the requirements of a specific client***

ATTACHMENT C

1. SUPERVISOR TRAINING

Managers and supervisors must be adequately trained in the topics listed below to ensure they effectively communicate and implement the Drug, Alcohol and Contraband Program.

- Rationale for having the Drug, Alcohol and Contraband Program
- Requirements contained in the Program
- Procedures for implementing the Program
- Drug and alcohol abuse terms and symptoms
- Reasonable suspicion that an employee is under the influence of drugs or alcohol
- Documentation of potential drug or alcohol abuse problems
- Protecting employee confidentiality

Training on the recognition of performance indicators of probable drug and/or alcohol use and on its effects and consequences to personal health, safety and the workplace shall be included. It is required that each supervisor who will determine whether an employee must be tested based on reasonable suspicion, receive at least one 60-minute training session on the specific, contemporaneous, physical, behavioral and performance indicators of probable drug and alcohol use. Records of individuals trained (including name and date) must be maintained by the company and available to customers upon request.

(see Attachment D: Supervisor Drug and/or Alcohol Checklist)

2. EMPLOYEE EDUCATION

Employee education opportunities must be developed to communicate the Drug and Alcohol Testing Program. Education and communication must include, but are not limited to the following topics:

- Requirements contained the Drug, Alcohol and Contraband Program
- Types and effects of drugs, including prescription and over-the-counter medication, and alcohol on employees and the ability to perform their work safely.
- Ways to assess whether employees may have drug and alcohol dependency problems or may be under the influence of drugs or alcohol.
- Requirement to inform supervisors of reasonable suspicion of an employee being under the influence of drugs or alcohol
- Disciplinary actions for employees failing to comply with the Drug, Alcohol and Contraband Program.

ATTACHMENT D SUPERVISOR DRUG AND/OR ALCOHOL CHECKLIST

(Example Form: Do not send this form to NCMS. This should be kept for your records only)

	Supervisor Drug and/or Alcohol Checklist			
	Question Yes No			
1.	Smell of alcohol on breath of person?			
2.	Śpeech:			
	Slurred?			
	Confused?			
	Fragmented?			
	Siow?			
	Unusually soft?			
	Unusually loud?			
3.	Disorientation – Is the contractor confused about:			
	Where he or she is?			
	 What day it is? 			
	What time it is?			
4.	Apparent inability to focus on work?			
5.	Unusual or unexplained resistance to authority or refusal to follow reasonable directions?			
6.	Lack of motor coordination?			
7.	Mood:			
	 Belligerent? 			
	Moody?			
	Ecstatic?			
	 More nervous than usual? 			
	Giddy?			
	Talkative?			
	Drowsy?			
8.	Skin color:		I	
	Pale?			
	Flushed?			
9.	Excessive perspiration?			
-	Excessive trips to the restroom?			
-	Bloodshot eyes?	<u> </u>	ļЦ	
	Dilated pupils?	<u> </u>	<u> </u> ↓	
	Pinpoint pupils?	닏	닏	
	Traces of alcohol in containers?	<u> </u> -	¦∐-	
	Confession by contractor that he/she was drinking alcohol or ingesting drugs?	⊢⊢	믐	
_	Confirmation by other contractors or employees? Presence of substances with the appearance of drugs?	╞╤	╞╧	
-	Presence of drug paraphernalia?	┝╞┽	┟╠┽	
	Smell of marijuana?	┝┝┤	片	
-	Congregation of contractors in remote areas of the companies, facilities, or in areas not usually frequented by contractors?			
21.	Weariness, fatigue, or exhaustion?			

	Supervisor Drug and/or Alcohol Checklist				
	Question Yes No				
22.	Deteriorating physical appearance?		Τ		
23.	Yawning excessively?		Τ		
24.	Blank stare or expression?				
25.	Sudden and/or unpredictable change in energy level?				
26.	Unusually energetic?				
27.	Shaking or trembling of hands?				
28.	Sunglasses worn at inappropriate times?				
29.	Changes in appearance after lunch break?				
30.	Withdrawal and avoidance of peers?				
31.	Complaints from co-workers?				
32.	Excessive absenteeism, especially Mondays, Fridays and days before or after holidays or paydays?				
33.	Unusually high incidence of colds, flu, upset stomach, and/or headaches?		T		
34.	Unauthorized or unscheduled absences?		Τ		
35.	Breathing or swallowing difficulties?				
36.	Unusual sneezing / nasal congestion?				
37.	Needle marks on arms?				
38.	Prolonged lunch hours?				
39.	Tardiness?				
40.	Unexplained departures from work or disappearances from the job area?				
41.	More than average number of job-related mistakes injuries or accidents?				
42.	Decrease in efficiency or productivity?				
	Careless operation of equipment?				
44.	Careless performance of job?		T		

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"Driver Policy"

Tanner Services, LLC will request an MVR check at time of employment and annually on each employee with a valid driver's license. Each employee who qualifies to drive a company vehicle will be added to an approved driver's list. The following criteria will be utilized for identifying individuals with undesirable driving records. Those individuals will not qualify as an approved driver for the company.

- 1. More than 3 moving violations and/or accidents in the most recent 3 years.
- 2. More than 2 moving violations and/or accidents in the most recent year.
- 3. Drivers with a major conviction within the last 5 years, which includes:
 - "Driving While Intoxicated" (DWI), "Driving Under the Influence" (DUI), or OUI
 - Refusing a substance test
 - Hit & Run/Leaving the scene of an accident.
 - Reckless driving violations, Manslaughter
 - Homicide or assault through use of motor vehicle.
 - Attempting to elude a police officer.
 - Drag Racing
 - Drivers who currently have a suspended or revoked license, or those who have had three or more license suspensions in the past.

Driving and cell phone use. The use of a cell phone while driving is prohibited. Drivers are required to safely park the vehicle prior to using a cell phone.

Driving and texting. Texting while driving is prohibited. Drivers are required to safely park the vehicle prior to texting.

If an employee is no longer eligible to drive, notification will be given to the employee and may be grounds for immediate termination.

The personal use of Company Vehicles is strictly prohibited. Any personal use of a company vehicle may be grounds for termination and/or limited use of the vehicle, unless approved by management. Unauthorized personal use of a company vehicle may be charged back to the employee at a rate of \$1.50 per mile.

Print Name

Signature

Date



Revised 6/6/17

Loading and Unloading LPSC Regulated Waste using Vacuum Bottle Trailer	Page 1
Tanner Services LLC. Master Safety & Health Program	07/19

Purpose

The purpose of this program is to protect employees and property from harm and damage by ensuring that LPSC regulated waste carried by a motor vehicle is properly loaded, unloaded, and secured in accordance with this program when the vehicle is operated at any time.

Policy

This applies to all Tanner Services vehicles permitted by the Louisiana Public Service Commission (LPSC) that will haul non-hazardous waste.

Procedures

The vacuum bottle and truck must be inspected prior to use to ensure both are in safe working condition. Once equipment is found to be safe for use the vacuum bottle must be positioned as close as possible to the suction area. This allows operators to use as little hose as possible. The wheels are then chocked to prevent equipment from moving while in use.

With a spill containment in place, the vent line is then checked to ensure it is open to release all pressure from the vacuum bottle. The pressure gauge is checked as well, once cap is removed the hose is hooked to trailer first then to suction/discharge site.

With valve in correct position for suction/discharge the pump is started. Bypass is then closed to start suction. Valves on both sides of hoses are then opened for flow to start. Operators must check with mud engineer on site to know how much the waste is weighs in order not to exceed legal weight requirements.

Once desired level is met, trailer valve is closed first followed by valve on opposite side of the hose. Pump is then turned off. The bleed off is then open to relieve pressure with a spill bucket underneath. Once all pressure is bled off the suction hose is disconnected first followed by trailer side with containment underneath both ends. Cap is replaced on trailer and any remaining pressure is bled out. Tires are un-chocked, and driver must have proper documentation prior to departing site.

Driver arrives to disposal site where some sites handle the unloading by hooking up hoses themselves. Once empty driver goes to wash out area to rinse out trailer and clean off connections.



Loading and Unloading LPSC Regulated Waste using End Dump Trailer	Page 1
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Purpose

The purpose of this program is to protect employees and property from harm and damage by ensuring that LPSC regulated waste carried by a motor vehicle is properly loaded, unloaded, and secured in accordance with this program when the vehicle is operated at any time.

Policy

This applies to all Tanner Services vehicles permitted by the Louisiana Public Service Commission (LPSC) that will haul non-hazardous waste.

Procedures

The end dump trailer, truck, and excavator must all be inspected prior to use to ensure all are in safe working condition. Once equipment is found to be safe for use, the end dump must be positioned properly using a spotter. This allows operators to move excavator as little as possible when loading end dump. The trailer wheels are then chocked to prevent equipment from moving while in use.

The back gate of the trailer is checked to ensure that it is secured tightly to prevent any leakage of material. The top gates are unbonded and then are opened. Operators must check with mud engineers to find out weight of the material to prevent truck from exceeding legal weight requirements.

The loading area is then checked to ensure that is clear of personnel prior to equipment moving. The operator then uses excavator to load the end dump carefully and slowly to prevent any spills. A spotter is used to monitor the level/amount of the material in the trailer to tell the operator when to stop loading.

Once desired level is met, top gate is closed and bound down securely to prevent any spills while transporting to disposal. Tires are un-chocked and driver collects required documentation prior to departing site.

Driver arrives to disposal site where he loosens the top gates to bleed off any pressure prior to opening the back gate. Binders are loosened on back gate and driver then opens back gate to start unloading in designated area. Driver picks up trailer with cylinders until trailer is empty. Once empty driver lowers the trailer, rinses it off then resecures trailer prior to departing disposal.