# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>SAFETY POLICY STATEMENT</td>
<td>3</td>
</tr>
<tr>
<td>GENERAL SAFETY POLICIES</td>
<td>4</td>
</tr>
<tr>
<td>HAZARD ASSESSMENT</td>
<td>7</td>
</tr>
<tr>
<td>ACCIDENT REPORTING</td>
<td>10</td>
</tr>
<tr>
<td>ELECTRICAL SAFETY</td>
<td>13</td>
</tr>
<tr>
<td>LOCK-OUT / TAG-OUT</td>
<td>16</td>
</tr>
<tr>
<td>HAZARDOUS COMMUNICATION</td>
<td>18</td>
</tr>
<tr>
<td>PERSONAL PROTECTIVE EQUIPMENT</td>
<td>20</td>
</tr>
<tr>
<td>HEARING CONSERVATION</td>
<td>23</td>
</tr>
<tr>
<td>RESPIRATORY PROTECTION</td>
<td>26</td>
</tr>
<tr>
<td>EYE PROTECTION</td>
<td>31</td>
</tr>
<tr>
<td>KEVLAR SLEEVES</td>
<td>32</td>
</tr>
<tr>
<td>EMERGENCY ACTION PLAN</td>
<td>33</td>
</tr>
<tr>
<td>FIRE PREVENTION</td>
<td>36</td>
</tr>
<tr>
<td>CRANE SAFETY</td>
<td>41</td>
</tr>
<tr>
<td>COMPRESSED GAS PLAN</td>
<td>44</td>
</tr>
<tr>
<td>FALL PROTECTION</td>
<td>48</td>
</tr>
<tr>
<td>TRANSPORTING AN INJURED WORKER</td>
<td>51</td>
</tr>
<tr>
<td>LOOSE CLOTHING</td>
<td>52</td>
</tr>
</tbody>
</table>
SAFETY POLICY STATEMENT

Corrosion Materials is committed to accident prevention as an essential ingredient in the success of its’ business. Quality, customer service, and above all, employee welfare will be enhanced through a strong safety program.

The company is dedicated to providing the active leadership and support necessary to develop and maintain a successful safety program with these objectives:

1. Provide a safe and healthful work environment for all employees.
2. Minimize the risk of human and economic losses resulting from personal injury and property damage.
3. Insure the security, protection, and well-being of all personnel, property, and equipment of the company.
4. Comply with all existing safety and health laws that apply to the work place.

It is the responsibility of all employees to make safety a part of their daily activity. Safety must be considered a vital part of every job in the company.

Ronald P. Campbell
President Corrosion Materials
GENERAL SAFETY POLICIES AND PROCEDURES

SAFETY POLICIES AND PROCEDURES

This General Safety Policies and Procedures Plan summarizes information regarding Corrosion Materials safety policies and procedures.

ADMINISTRATIVE DUTIES

The Corrosion Materials Safety Committee is responsible for developing and maintaining this written Safety Plan. This committee is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan. The Corrosion Materials Safety Committee is responsible for the administration of our safety program and to conduct periodic evaluations of the various elements of the plan. This written Plan is kept in the Operations Manager’s and all supervisor’s offices.

If, after reading this plan, you find that improvements can be made, please contact The Corrosion Materials Safety Committee. We encourage all suggestions because we are committed to creating a safe workplace for all our employees. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

GENERAL COMPANY SAFETY PHILOSOPHY STATEMENT

The Corrosion Materials’ safety philosophy has been developed to reflect and communicate our proactive safety attitude. Corrosion Materials will comply with appropriate safety and security laws and regulations such as those established by:

- The Occupational Safety and Health Act (OSHA),
- The EPA (Environmental Protection Agency),
- The DOT (Department of Transportation), and
- All other applicable federal, state, and local safety and health regulations.

In addition, our company safety philosophy is based on the following:

- All injuries and accidents are preventable through establishment and compliance with safe work procedures.
- The prevention of bodily injury and safeguarding of health are the first considerations in all workplace actions and are the responsibility of every employee at every level.
- Written safety plans describing the safe work practices and procedures to be practiced in all workplace actions are an essential element of the overall workplace safety program. All employees at every level are responsible for knowing and following the safety practices described in the written safety plans.
- Off the job, all employees should be similarly safe and demonstrate awareness of potential hazards.

TYPES OF WRITTEN SAFETY PLANS IN PLACE
Because we care about our employees and strive to provide a safe work place, we have instituted a number of written
safety plans. These plans provide guidance and direction for the safety issues they cover. The topics covered include
the following:

GENERAL SAFETY POLICIES
HAZARD ASSESSMENT
ACCIDENT REPORTING
ELECTRICAL SAFETY
LOCK-OUT / TAG-OUT
HAZARDOUS COMMUNICATION
PERSONAL PROTECTIVE EQUIPMENT
HEARING CONSERVATION
RESPIRATORY PROTECTION
EYE PROTECTION
KEVLAR SLEEVES
EMERGENCY ACTION PLAN
FIRE PREVENTION
CRANE SAFETY
COMPRESSED GAS PLAN
FALL PROTECTION
TRANSPORTING AN INJURED WORKER
LOOSE CLOTHING

OUR RESPONSIBILITIES

It is the policy of Corrosion Materials to provide a safe and healthful work environment by establishing an effective
and continuous safety program that incorporates educational and monitoring procedures to teach safety, correct
deficiencies, and provide a safe, clean working environment. All company supervisors, managers, directors, and
officers are responsible for the enforcement of safety policies and practices. They must ensure that:
- Their staff members are trained in appropriate safety procedures.
- They notify the Safety Manager, and complete the necessary forms if an accident or work-related health problem
  occurs in their department.
- Equipment and property within their area of responsibility is maintained in a safe, hazard-free condition.

All employees have a responsibility to themselves and to the company for their safety and the safety of their
coworkers. All employees are required to:
- Comply with all federal, state, and local rules and regulations relevant to their work.
- Observe all company rules and regulations related to the efficient and safe performance of their work.
- Integrate safety into each job function and live by this philosophy in the performance of job duties.
- Report or correct unsafe equipment and practices.
- Report any accidents that occur while on the job.

DISCIPLINARY POLICY

All safety rules, procedures, and plans in effect at this company must be followed. Violation of any company safety
rule will result in disciplinary action against the violating employee. The severity of the penalty will be in direct
correlation to the severity of the safety violation and disciplinary actions are not progressive. The list of possible
disciplinary actions includes:

Verbal reprimand - An informal discussion of the incorrect behavior that should take place as soon as possible after
the supervisor has knowledge of the safety misconduct.

Written reprimand - A written form documenting the safety misconduct, to be presented to the employee and placed
in the employee's personnel file.
Warning of probation - A written form documenting the safety misconduct and warning the employee that another incident will lead to probation, to be presented to the employee and placed in the employee's personnel file.

Probation - A trial period during which the employee is given specific rules and goals to meet, during which, if he or she cannot meet the rules and goals, he or she is subject to termination.

Warning of suspension - A written form documenting the safety misconduct and warning the employee that another incident will lead to suspension, to be presented to the employee and placed in the employee's personnel file.

Suspension - A period of time during which the employee is barred from attending work and during which the employee is not paid.

Dismissal/termination of employment:
The permanent separation of an employee from the company, initiated for disciplinary reasons, safety misconduct.
HAZARD ASSESSMENT

HAZARD ASSESSMENT

Our company performs regular hazard assessments to review the hazards in the work place, and protect employees from those hazards. Hazards can change with every process change. Therefore, we perform a hazard assessment of our facility every twelve months or when new equipment is added or an operation is modified, added or deleted. Our system for conducting a hazard assessment involves the Safety Committee and the department supervisors. The method used to conduct the assessment is:

1. Break each job function down into its component actions or movements;
2. Identify the potential hazards associated with each step;
3. List the hazards or possible accidents;
4. Formulate and implement actions to prevent or eliminate the potential hazards or accidents;
5. Train all affected employees;
6. And if required change the job procedures.

When safety deficiencies are discovered, the Safety Committee will recommend and implement specific corrective actions. When deficiencies are discovered, and corrections are to be made, the Safety Committee will perform a follow-up inspection and hazard assessment to verify that the corrections have been made.

In addition to internal Hazard Assessment, we will employ the resources of the Louisiana Department of Labor to perform a full Safety and Health Survey (OSHA type inspection) every 3-5 years.

GENERAL CONDITIONS AT THE WORKSITE

The floors are clean, dry, and clear of obstacles.

The lighting is adequate for the work being performed.

Fire protection equipment is readily accessible. Employees have been trained to use it.

Emergency exits are clearly marked.

Trucks and/or motorized vehicles are properly equipped with brakes, overhead guards, backup signals, horns, steering gear, seat belts, and identification, as necessary.

All employees operating vehicles and equipment are properly trained and authorized.

All employees are wearing proper personal protective equipment for the jobs they are performing.

EMPLOYEE EXPOSURES TO CHEMICALS

Our hazard assessment looks at the workers' possible exposures to hazardous chemicals, dusts, and fumes. Our latest Hazard Assessment and Air Quality Monitoring indicates that most toxic or hazardous chemicals, dusts, and fumes have been eliminated from the work place. Exposure levels are below the TLV established by OSHA. The ventilation in our facility is excellent, and there are no confined spaces.
GENERAL RESULTS OF THE LATEST HAZARD ANALYSIS

The sources of movement of tools, machine elements and particles are all machines in the machine shop, the various grinding tools used in the pipe, plate, bar, and welding departments, the belt sanders, and the abrasive and band saws in the pipe, plate, and bar shops.

There are areas throughout the facility where movement of personnel could result in collision with stationary objects.

The sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc. are the heat treat facility, the plasma machine and the welding arcs.

The types of chemical exposures are limited to commercial cleaning agents, cooling fluids, and various petroleum products.

The sources of harmful dust are grinding, sanding, and wood shop operations.

The sources of light radiation are the heat treating facility, the plasma machine, and welding arcs.

The sources of falling objects or potential for dropping objects are the overhead cranes and the jib cranes.

The sources of sharp objects which might pierce the feet or cut the hands are the wood pile, machine shop operations, the edges of plate and sheet in the warehouse and the burrs on the ends of pipe and tubing.

The sources of rolling or pinching objects which could crush the feet are in the pipe and bar shops and in the shipping department while crating pipe and bar.

There are no electrical hazards in our facility provided that all covers are in place during normal operation and the equipment is properly maintained and guarded.

Human factors that affect hazards are unsafe operation of equipment, not using provided personal protective equipment, and negligence.

Obviously, problems that are uncovered by the team's process hazard analysis must be acted upon. The system to follow-up on any recommendations or findings that result from the analysis is a follow-up inspection.

PERSONAL PROTECTIVE EQUIPMENT

Corrosion Materials either provides all required personal protective equipment or reimburses the employee up to a set amount for protective foot wear and eye wear.

All employees in the machine shop, weld shop, shipping, material processing, and quality control departments are required to wear approved steel toed shoes or boots and safety glasses while in any production area.

In addition to the above, all personnel must wear a full face shield and hearing protection when performing any grinding operation.

Hearing protection must be worn when operating the plasma machine, the plate saw, and any of the abrasive saws.

Gloves must be worn when handling material with sharp edges. Except where gloves would create a greater hazard.

CONCLUSION
Hazard assessment is a continuous process. The information that results from each assessment must be utilized to correct potential problems to ensure a safe environment for our employees and the surrounding community.

CERTIFICATE OF HAZARD ASSESSMENT


WE ALSO CERTIFY THAT, AS PART OF THIS HAZARD ASSESSMENT, REQUIREMENTS FOR PERSONAL PROTECTIVE EQUIPMENT HAVE BEEN DETERMINED.

___________________________________________
ROBERT HAYMAN,
FOR THE SAFETY COMMITTEE
ACCIDENT REPORTING AND INVESTIGATION PLAN

Purpose

Our accident reporting and investigation plan prescribes methods and practices for reporting and investigating accidents and providing a means to deal with workplace accidents in a standardized way that can be read and understood by all managers, supervisors, and employees. The requirements of this plan apply to all operations and departments at Corrosion Materials.

Accident Reporting Procedures

Employees injured on the job are to report the injury to their supervisor as soon as possible after the incident/accident. Near miss accidents or incidents (when an employee nearly has an accident but is able to avoid it) must be reported as well.

The supervisor must immediately notify the operations manager when an incident/accident occurs. If the operations manager is not available, the Corporate HR Representative should be notified instead.

The supervisor must fill out a First Report of Injury form and submit it to the Corporate HR Representative no later than the next morning following the accident.

Any employee witnessing an accident at work is to call for emergency help or whatever assistance appears to be necessary. In addition, the employee is immediately to report the accident to his or her supervisor and take part in answering questions related to the Accident Report and Accident Investigation.

Accident Investigation Procedures

Thorough investigation of all accidents will lead to identification of accident causes and help:

- Determine why accidents occur, where they happen, and any trends that might be developing;
- Employees develop an awareness of workplace problems and hazards;
- Identify areas for process improvement to increase safety and productivity;
- Note areas where training information or methods need to be improved; and
- Suggest a focus for safety program development.

For all accident investigations, the operations manager or the area supervisor will perform the
following duties:

- Conduct the accident investigation at the scene of the injury as soon after the injury as safely possible.
- Ask the employee involved in the accident and any witnesses, in separate interviews, to tell in their own words exactly what happened.
- Repeat the employee's version of the event back to him/her and allow the employee to make any corrections or additions.
- After the employee has given his/her description of the event, ask appropriate questions that focus on causes.
- When finished, remind the employee the investigation was to determine the cause and possible corrective action that can eliminate the cause(s) of the accident.
- Complete an accident investigation report with the employee and review data with employee for accuracy.

The accident investigation report is used to:

- Track and report injuries on a monthly basis;
- Group injuries by type, cause, body part affected, time of day, and process involved;
- Determine if any trends in injury occurrence exist and graph those trends if possible;
- Identify any equipment, materials, or environmental factors that seem to be commonly involved in injury incidents;
- Discuss the possible solutions to the problems identified with the safety team and superiors; and
- Proceed with improvements to reduce the likelihood of future injuries.

**Injury/Medical Issues**

If a workplace accident results in injury or illness requiring hospitalization of three or more employees or the fatality of one or more employees, the Corporate HR Representative or the operations manager will report the incident within eight hours by phone to the nearest OSHA office at 9100 Bluebonnet Centre Blvd, Baton Rouge, LA 70809, phone number 389-0474.

If an injured person is taken to a doctor, a statement from the doctor will be attached to the Accident Report form. Employees with workplace injuries resulting in time off work must present a doctor's release to return to work.

On the day of injury, the company will cover the time loss due to doctor and/or emergency room visits or inability to work.

Any time an associate is away from work because of an accident on-the-job, it should be recorded on the time sheet as follows:

- List total hours missed in the “Other” column
Record keeping

The Corporate HR Representative is responsible for maintaining the following records and documentation:

- OSHA 300 Log of Work Related Injuries and Illnesses
- First Report of Injury forms
- Training records

The operations manager is responsible for maintaining the following records and documentation:

- Accident Investigation Reports

Training

The information and requirements of this written plan are presented to employees during their initial Safety Orientation.

Program Evaluation

The accident reporting and investigation program is evaluated and updated by the Corrosion Materials Safety Committee yearly to determine whether the plan is being followed and if further training may be necessary.
ELECTRICAL SAFETY

GENERAL COMPANY POLICY

The purpose of this program is to prevent electric shock or other injuries resulting from direct or indirect electrical contacts to employees working on or near energized or deenergized parts. This program applies to all work operations at Corrosion Materials where employees may be exposed to live or de-energized parts.

The Operations Manager has overall responsibility for coordinating safety and health programs in this company. The Maintenance Manager is the person having overall responsibility for the Electrical Safety Program and he will review and update the program, as necessary. Under this program, our employees receive instructions in the purpose and use of energy control procedures, as well as the other required elements of the Control of Hazardous Energy standard. This instruction includes the deenergizing of equipment, applying locks and tags, verifying deenergization, and equipment Reenergizing.

HAZARD ANALYSIS REPORT

To determine areas of Corrosion Materials that need to be included in the Electrical Safety Program, the Maintenance Manager has conducted a hazard analysis of our workplace. This analysis, located in the Operations Manager's office, has provided us with information identifying which departments have equipment using electricity, various types of wiring installations, and the types of employee functions that must be covered by the Electrical Safety Program. The departments/areas of our company identified as having electrically operated equipment and/or wiring installations are:

- MACHINE SHOP
- WELD SHOP
- QUALITY CONTROL DEPARTMENT
- PIPE SHOP
- BAR DEPARTMENT
- PLATE SHOP
- SALES OFFICE
- PURCHASING OFFICE
- SHIPPING DEPARTMENT
- WOOD SHOP
- OTHER OFFICE AREAS.

Electrically operated equipment which must be deenergized before work can be done on it includes all rotating equipment and all equipment where a shock hazard exists when the covers are removed or access doors are open. Employees of our company who are qualified to work on, near, or with energized electric circuits and equipment are Maintenance Department personnel. No other Employees are authorized to work on, near, or with energized electric circuits and equipment.

TRAINING PROGRAM

Every employee at Corrosion Materials who faces the risk of electric shock from working on or near energized or deenergized electrical sources receives training in electrical related safety work practices pertaining to the individual's job assignment. The goal of our electrical safety training program is to ensure that all employees
understand the hazards associated with electric energy and that they are capable of performing the necessary steps to protect themselves and their co workers. Our electrical training program covers these basic elements:
* Lockout and tagging of conductors and parts of electrical equipment.
* Safe procedures for deenergizing circuits and equipment.
* Application of locks and tags.
* Verification that the equipment has been de-energized.
* Procedures for reenergizing the circuits or equipment.
* Other electrically related information which is necessary for employee safety.
This training must be completed before participants will be allowed to work in areas of Corrosion Materials where electrical hazards exist.

The format we follow for our training program is on-the-job. The procedures we follow when training new employees who will be working on or near electrical equipment or circuitry are as follows:
1. The employee will be shown and have access to a layout drawing of the entire plant that locates all breaker panels and electrical disconnects.
2. The Maintenance Manager will walk the employee through the plant showing him the physical location of the breaker panels and electrical disconnects attached to each piece of equipment.
3. At each breaker panel, the Maintenance Manager will show the employee the breaker or disconnect for each piece of equipment wired to that breaker or disconnect.
4. The employee will be shown the tag on the electrical disconnect located at each piece of equipment that designates the breaker panel and breaker for that machine.

When changes occur in our company that involve electrical elements, we provide additional employee training to ensure the safety of all affected workers. In this case, we follow these procedures:
1. The electrical plan drawing of the facility is updated to indicate the new location of equipment, breaker panel, and electrical disconnect.
2. Procedures 2-4 above are reviewed.

The Maintenance Manager conducts the electrical safety training for all employees. Every employee who participates in the Electrical Safety Program receives a certificate which they sign verifying that they have completed the course, that they understand the information presented, and that they will follow all company policies and procedures regarding electrical safety. These signed certificates of training as well as all training material and documentation are kept in the Maintenance Department.

**LOCKOUT AND TAGGING PROGRAM**

It is a Corrosion Materials policy that circuits and equipment must be disconnected from all electric energy sources before work on them begins. We use lockout and tagging devices to prevent the accidental reenergization of this equipment. These lockout and tagging procedures are the main component of our electrical safety program. The safety procedures that make up our lockout and tagging program include these elements:

**Deenergizing circuits and equipment.** We disconnect the circuits and equipment to be worked on from all electric energy sources and we release stored energy that could accidentally reenergize equipment.

**Application of locks and tags.** All employees are authorized to place a lock and tag on each disconnecting means used to deenergize our circuits or equipment before work begins. Our locks prevent unauthorized persons from reenergizing the equipment or circuits and the tags prohibit unauthorized operation of the disconnecting device.

**Verification of deenergized condition of circuits and equipment.** Prior to work on the equipment, we require that a "qualified" employee verifies that the equipment is deenergized and cannot be restarted.

**Reenergizing circuits and equipment.** Before circuits or equipment are reenergized, we follow these steps in this order:
* A "qualified" employee conducts tests and verifies that all tools and devices have been removed.
* All exposed employees are warned to stay clear of circuits and equipment.
* Authorized employees remove the locks and tags.
* We do a visual inspection of the area to be sure all employees are clear of the circuits and equipment.
The Maintenance Manager is responsible for the overall lockout and tagging procedures in our company. The written procedures for locking and tagging equipment are kept in the Operations Manager’s office with a copy in the Maintenance Department. Maintenance Department personnel are the persons trained and authorized to de-energize, verify, and re-energize electric circuits and equipment in our company.

ENFORCEMENT

Constant awareness of and respect for electrical hazards, and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.
LOCKOUT / TAGOUT

PURPOSE

This procedure establishes the requirements for controlling hazardous energy whenever maintenance or repair is done on any of our electrical equipment. It is used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources and locked out before employees perform any servicing or maintenance where the unexpected energization or start-up of the machine or equipment could cause injury. This program applies to all work operations at Corrosion Materials where employees must deal with lockout/tagout situations as part of their job duties.

Authorized employees subject to the requirements of this program include all Maintenance Department personnel and Operations Department supervisors. Authorized employees must be trained on their duties. Affected employees subject to the requirements of this program include all Operations Departments employees and they must be trained on their duties.

PROCEDURES

Lockout is the preferred method of isolating machines or equipment from energy sources. Tagout is to be performed instead of lockout only when there is no way to lockout a machine. Affected employees are verbally notified when their machine is to be locked out.

Electrical machinery or equipment shall be turned off or shutdown by following the procedures specified by the equipment manufacturer. The machine will be shutdown in a way that avoids any additional or increased hazards to employees. The machine’s electrical disconnect will be located and the handle moved to the disconnect position.

LOCKOUT PLACEMENT, REMOVAL, AND RESPONSIBILITY PROCEDURES:
1. Lockout or tagout devices will be applied only by an authorized employee.
2. A lockout device must be able to hold the electrical disconnect in the “safe” or “off” position.
3. If a tagout device is used, it must clearly indicate that the electrical disconnect must not be moved from the “safe” or off” position. The tag must be new.
4. Before starting work on a machine that has been locked or tagged out, the employee shall verify that the machine is isolated from the electrical supply and that it is completely deenergized.
5. Before lockout or tagout devices are removed and electrical power is restored to the machine, the work area shall be inspected to ensure that nonessential items have been removed, all machine parts are properly installed, and that all personnel know that the machine is about to be restarted.
6. Each lockout or tagout device shall be removed by the employee who applied the device or by the maintenance person who actually performed the work on the machine. Tags must be discarded after removal.

TESTING OR POSITIONING A LOCKED OR TAGGED OUT MACHINE:
If a locked out machine must be turned on to test a component or to position a part of the machine, the following steps will be taken:
1. Remove all materials and tools from the machine.
2. Ensure that all employees are clear of the machine.
3. Remove the lockout or tagout device.
4. Turn on the power and test the component, or position, or machine.
5. Turn off the power and reapply the lockout or tagout device.
6. Continue servicing or repairing the machine.
ANNUAL INSPECTION is done to review our energy control procedures and to ensure that the procedures and requirements of the standard are being followed. The Maintenance Manager has overall responsibility for the Lockout/Tagout Program. The Safety Committee will review and update the program, as necessary. Copies of the written program may be obtained from the Operations Manager.
HAZARDOUS COMMUNICATION

PURPOSE

The purpose of this program is to inform our employees and other interested persons, that Corrosion Materials is complying with the OSHA Hazard Communication Standard by compiling a hazardous chemicals list, by using material safety data sheets (MSDSs), by ensuring that containers are labeled, and by providing our employees with training and information availability. This program applies to all work operations in our company where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation. All employees can obtain further information on this written program, the hazard communication standard, applicable MSDS's, and chemical information lists from the Operations Manager. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals.

HAZARD EVALUATION PROCEDURES

Our chemical inventory is a list of hazardous chemicals known to be present in our workplace. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists.

Sometimes hazardous chemicals can be identified using purchase orders. Identification of others requires an actual inventory of the facility. The Safety Committee will update the inventory as necessary and will perform a complete chemical inventory at least once per year. The chemical inventory list, along with related work practices used in our facility are located in the Operations Manager's office and are accessible during work hours. Since we do not manufacture any chemicals, we do not make any hazard determinations. After the chemical inventory is compiled, it serves as a list of every chemical for which an MSDS must be maintained.

MATERIAL SAFETY DATA SHEETS (MSDSs)

The MSDSs we use are fact sheets for chemicals which pose a physical or health hazard in the workplace. MSDSs provide our employees with specific information on the chemicals they use. The Operations Manager is responsible for obtaining and maintaining the MSDSs at our facility. He will contact the chemical manufacturer or vendor if additional research is necessary. All new procurements for the company must be reviewed by the operations Manager and if the MSDS is not received at time of first shipment, we will request the MSDS from the supplier. The material safety data sheets are kept in the Operations Manager's office. Employees can obtain access to them by requesting to read the MSDSs in the binder located in the operations managers office.

MULTI-EMPLOYER FACILITY

When contractors or any other employers’ workers will be working at this workplace, we will:

*Provide upon request the other employer(s) with MSDSs for any of our chemicals to which their employees may be exposed, and
*Relay necessary label and/or emergency precautionary information to the other employer by memo or electronic mail.

ADDITIONAL INFORMATION

All employees can obtain further information on this written program, the hazard communication standard, applicable MSDSs, and chemical information lists from the Operations Manager.
Personal Protective Equipment (PPE) Program

PURPOSE OF PROGRAM

CORROSION MATERIALS has developed this written PPE program to document and specify all information relative to our PPE needs because we believe it is our obligation to provide a hazard free environment to our employees. The basic element of any PPE program is an in depth evaluation of the equipment needed to protect against the hazards of the workplace; this is the initial hazard assessment. PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound manufacturing practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards which cannot reasonably be abated otherwise.

HAZARD ASSESSMENT

In order to assess the need for PPE the following steps are taken:
1. The Safety Manager and the Safety Committee identifies job classifications where exposures occur or could occur.
2. The Safety Manager and the Safety Committee conduct a walk through survey of workplace areas where hazards exist or may exist to identify sources of hazards to employees. They consider these basic hazard categories:
   - Impact
   - Heat
   - Penetration
   - Harmful dust
   - Compression (roll over)
   - Light (optical) radiation
   - Chemical

During the walk through survey the Safety Manager and Safety Committee observe and record the following hazards along with PPE currently in use (type and purpose):
   - Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects.
   - Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment.
   - Types of chemical exposures.
   - Sources of harmful dust.
   - Sources of light radiation, i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights.
   - Sources of falling objects or potential for dropping objects.
   - Sources of sharp objects which might pierce the feet or cut the hands.
   - Sources of rolling or pinching objects which could crush the feet.
   - Layout of workplace and location of co-workers.
   - Electrical hazards.
3. Following the walk through the data and information is organized for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment.
4. Each of the basic hazards is reviewed and a determination made as to the frequency, type, level of risk, and seriousness of potential injury from each of the hazards found.
5. The hazard assessment is documented as a written certification that identifies the workplace evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and that the document is a certification of hazard assessment.

SELECTION GUIDELINES
Once hazards have been identified and evaluated the general procedure for selecting protective equipment is to:
1. Become familiar with the potential hazards and the type of protective equipment (PPE) that are available, and what they can do.
2. Compare types of equipment to the hazards associated with the environment.
3. Select the PPE which ensures a level of protection greater than the minimum required to protect employees from the hazards.
4. Fit the user with proper, comfortable, well-fitting protection and instruct employees on care and use of the PPE. It is very important that the users are aware of all warning labels for and limitations of their PPE.

It is the responsibility of the Safety Committee to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records, and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed, but at least yearly. Elements which should be considered in the reassessment include:
• Adequacy of PPE program
• Accidents and illness experience
• Levels of exposure (this implies appropriate exposure monitoring)
• Adequacy of equipment selection
• Number of person hours that workers wear various protective ensembles
• Adequacy of training/fitting of PPE
• Program costs
• The adequacy of program records
• Recommendation for program improvement and modification
• Coordination with overall safety and health program

EMPLOYEE TRAINING

The Safety Committee/supervisor provides training for each employee who is required to use personal protective equipment. Training includes:
• When PPE is necessary
• What PPE is necessary
• How to wear assigned PPE
• Limitations of PPE
• The proper care, maintenance, useful life, and disposal of assigned PPE

Employees must demonstrate an understanding of the training and the ability to use the PPE properly before they are allowed to perform work requiring the use of the equipment. Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work. If an employee does not have the understanding or skill required, the employee must be retrained. The employee's supervisor is in the best position to observe any problems with PPE. Retraining may be required when changes in the workplace or changes in the types of PPE used render previous training obsolete. A permanent record of the training received by each employee will be maintained.

Because failure to comply with company policy concerning PPE can result in OSHA citations and fines as well as employee injury, an employee who does not comply with this program will be disciplined for noncompliance according to the following:
• Verbal warning for the first offense accompanied by retraining
• Written reprimand for the second offense which goes in the employee's permanent record
• Suspension without pay for a third offense and documentation in the permanent record
• Dismissal as a last resort.

CLEANING AND MAINTENANCE
It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned, and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees. If PPE is for general use, the Safety Committee has responsibility for cleaning and maintenance. If a piece of PPE is in need of repair or replacement it is the responsibility of the employee to bring it to the immediate attention of his or her supervisor or the Safety Committee. It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.
HEARING CONSERVATION PROGRAM

ADMINISTRATION

The purpose of our written hearing conservation plan is to protect the hearing of all personnel in the company. Elements of the hearing conservation program include:

- Monitoring,
- Audiometric testing program,
- Hearing Protection,
- Training and Information, and
- Record keeping.

MONITORING

The monitoring program provides an ongoing means of determining employee exposure to noise and protects employees based on excessive exposure. When information indicates that any employee's exposure may equal or exceed an 8-hour time-weighted average of 85 decibels, the company develops and implements an appropriate monitoring program to identify all employees for inclusion in the hearing conservation program and to select proper hearing protection.

To determine employee exposure to noise, we use calibrated equipment as supplied by an outside medical testing service. The company notifies all employees exposed at or above an 8-hour time-weighted average of 85 decibels of the results of the monitoring by giving the affected employees verbal notification.

The company provides an opportunity for affected employees or their representatives to observe any noise measurements conducted by making the employee a part of the monitoring activity. The company selects proper hearing devices for affected employees by determining the level of noise attenuation required and then by selecting the hearing device that will provide the required attenuation or better and be comfortable for the operators.

Monitoring is repeated whenever a change in production process, equipment or controls increases noise exposures to additional employees. Additional monitoring is also done when noise levels increase to determine if the attenuation provided by hearing protectors presently in use is adequate or if inadequate to determine the level of attenuation required.

AUDIOMETRIC TESTING PROGRAM

The audiometric testing program is available at no cost to all affected employees to ensure that noise exposures are kept at proper levels. The program ensures that a valid baseline audiogram is established for exposed employees by providing audiometric testing within 6 months of the hire date or when noise conditions change. Audiometric testing is repeated annually.

A qualified professional with the testing provider determines if a standard threshold shift has occurred by comparing the most recent audiogram to the baseline audiogram. If a standard threshold shift has occurred, the employee is notified in writing within 21 days. The employee is fitted with hearing protection that will attenuate the noise to an acceptable level and given one on one training in the use and care of the supplied hearing protection. Follow up observations will be made to insure that the employee is properly using the provided hearing protective device.
subsequent audiometric testing of an employee whose exposure to noise is less than an 8-hour (time weighted average) TWA of 90 decibels indicates that a standard threshold shift is not persistent, the employee is verbally informed of the new audiometric interpretation and that hearing protection is no longer required and discontinues the required use of hearing protectors for that employee. The audiogram is kept as a permanent part of the employee's personnel file along with a record of the verbal notification.

HEARING PROTECTION

Corrosion Materials makes hearing protectors available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to the employees by purchasing and locating within each area a supply of disposable hearing protectors. The company ensures use of available hearing protection by all affected employees by observation by supervisory and management personnel. We ensure that all employees have a variety of suitable protectors available. All protectors attenuate (lower) their exposure at least to an 8-hour time-weighted average of 90 decibels, or 85 decibels or lower for employees who have experienced a standard threshold shift in their hearing.

The company supplies a variety of suitable, disposable insert type hearing protection for our employees. We evaluate the adequacy of the hearing protection attenuation for the specific noise environments in which the protector will be used, according to specifications given in an appendix to the standard by calculating the in ear decible level with attenuation provided by the hearing protectors. We also reevaluate attenuation whenever employee noise exposures increase to the extent that current hearing protectors no longer provide adequate attenuation. We will then provide more effective hearing protection by calculating the required attenuation and providing hearing protectors that will produce the required attenuation to reduce the in ear decible level to an acceptable level.

TRAINING AND INFORMATION

CORROSION MATERIALS has a hearing protection training program for all employees exposed to noise at or above an 8-hour time-weighted average of 85 decibels. We ensure employee participation in the hearing protection training program by providing the training and requiring all affected employees to participate and to sign a participant list.

The company makes copies of the standard available to affected employees or their representatives upon request to any member of the safety committee. Also a copy of the standard is posted in the workplace: in the lunch room.

Training is repeated annually. The safety committee assures that the training material is updated to be consistent with changes in the protective equipment and work processes by an annual review. By requiring all affected employees to attend the annual training session and by documenting attendance, we assure that each affected employee is presented with at least the following information:

- The effects of noise on hearing;
- The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care; and
- The purpose of audiometric testing, and an explanation of test procedures.

The company makes informational materials pertaining to the Occupational Noise Exposure standard that are supplied to it by OSHA available to affected employees or their representatives by posting it in the lunch room.

RECORD KEEPING

Record keeping is an essential element of the hearing conservation program, since it is the means by which hearing
levels are tracked and assessed over a period of years. Corrosion Materials has in place a series of measures to maintain comprehensive and up-to-date records. We maintain accurate records of all employee exposure measurements required by the monitoring program of this regulation by placing exposure measurement records in each employee's personnel file. Audiometric test records obtained pursuant to paragraph (g) of 1910.95 are also placed in each employee's personnel file. Noise exposure measurement records are retained for two years and audiometric test records are kept for the duration of the affected employee's employment plus 30 years by maintaining the employee's personnel file in safe storage.

Access to records by employees, former employees, representatives designated by the individual employee, and OSHA, will be granted upon request.
RESPIRATORY PROTECTION PROGRAM

This respirator program specifies standard operating procedures to ensure the protection of all employees from respiratory hazards through proper selection and use of respirators. Respirators are to be used only where engineering control of respiratory hazards is not feasible, while engineering controls are being installed, or in emergencies.

RESPIRATOR SELECTION

Respirators are selected by the Safety Committee. Outside consultation, manufacturer's assistance, and other recognized authorities will be consulted if there is any doubt regarding proper selection.

Selection Procedure Checklist

- Select and provide respirators based on respiratory hazard(s) to which a worker is exposed and workplace and user factors that affect respirator performance and reliability.
- Select a NIOSH-certified respirator. (NIOSH stands for the National Institute for Occupational Safety and Health)
- Identify and evaluate the respiratory hazard(s) in the workplace, including a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form. Consider the atmosphere to be immediately dangerous to life or health (IDLH) if you cannot identify or reasonably estimate employee exposure. We have determined that the respiratory protection plan does not require protection from IDLH atmospheres, gases, or vapors by outside provider monitoring.
- Select respirators from a sufficient number of respirator models and sizes so that the respirator is acceptable to, and correctly fits, the user.
- When selecting respirators for atmospheres that are not IDLH:
  - Provide a respirator that is adequate to protect the health of the employee and ensure compliance with all other OSHA statutory and regulatory requirements, under routine and reasonably foreseeable emergency situations.
  - Select respirators appropriate for the chemical state and physical form of the contaminant.

Respirator Types and Uses

The following types of respirators are in use in this facility for the following uses:

<table>
<thead>
<tr>
<th>Types:</th>
<th>Situation used:</th>
</tr>
</thead>
<tbody>
<tr>
<td>NIOSH approved for dusts, fumes, and mists having an air contamination level not less than 0.05 mg/cubic Meter</td>
<td>ALL</td>
</tr>
</tbody>
</table>

Only NIOSH-certified respirators are selected and used. Where practicable, the respirators will be assigned to individual workers for their exclusive use.

MEDICAL EVALUATIONS

A medical evaluation to determine whether an employee is able to use a given respirator is an important element of an effective Respiratory Protection Program and is necessary to prevent injuries, illnesses, and even, in rare cases, death from the physiological burden imposed by respirator use. At Corrosion Materials, persons will not be assigned to tasks requiring use of respirators nor fit tested unless it has been determined that they are physically able to perform the work and use the respirator.

A licensed health care professional of Workforce Medical Center will perform medical evaluations using a medical questionnaire found in Sections 1 and 2, Part A of Appendix C of 29 CFR 1910.134. All medical questionnaires and
examinations are confidential and handled during the employee's normal working hours or at a time and place convenient to the employee. The medical questionnaire is administered so that the employee understands its content. All employees are provided an opportunity to discuss the questionnaire and examination results with their physician or other licensed health care professional (PLHCP). Before any initial examination or questionnaire is given, we supply the PLHCP with the following information so that the best recommendation concerning an employee's ability to use a respirator can be made:

- Type and weight of the respirator to be used by the employee;
- Duration and frequency of respirator use;
- Expected physical work effort;
- Additional protective clothing and equipment to be worn;
- Temperature and humidity extremes that may be encountered.

Once the PLHCP determines whether the employee has the ability to use or not use a respirator, a written recommendation containing only the following information will be sent to Corrosion Materials:

- Limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

**Follow-up medical examination:**
A follow-up medical examination will be provided if a positive response is given to any question among questions 1 through 8 in Section 2, Part A of Appendix C of 29 CFR 1910.134 or if an employee's initial medical examination demonstrates the need for a follow-up medical examination. Our follow-up medical examination includes tests, consultations, or diagnostic procedures that the PLHCP deems necessary to make a final determination.

**Additional medical examinations:**
Our company provides additional medical evaluations if:

- An employee reports medical signs or symptoms that are related to ability to use a respirator;
- A PLHCP, supervisor, or the respirator program administrator informs the employer that an employee needs to be reevaluated;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee reevaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, temperature) that may result in a substantial increase in the physiological burden placed on an employee.

Individuals may contact Workforce Medical Center for a copy of your confidential medical evaluation or questionnaire.

**FIT TESTING PROCEDURES**

Respirators must fit properly to provide protection. If a tight seal is not maintained between the facepiece and the employee's face, contaminated air will be drawn into the facepiece and be breathed by the employee. Fit testing seeks to protect the employee against breathing contaminated ambient air and is one of the core provisions of our respirator program.

Corrosion Materials makes sure employees are fit tested at the following times with the same make, model, style, and size of respirator that will be used:

- Whenever a different respirator (size, style, model, or make) is used;
- At least annually;
- Whenever the employee reports, or our company, PLHCP, supervisor, or Program Administrator makes visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight; and
• When the employee notifies the Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable. That employee will be retested with a different respirator facepiece.

Employees perform the following fit test each time a respirator is used:
• Users must follow the manufacturer's instructions each time a respirator is worn and it is the user's responsibility to insure a proper fit.
• User must not have a full beard or long sideburns that prevent a proper fit.

PROPER USE PROCEDURES

Once the respirator has been properly selected and fitted, its protection efficiency must be maintained by proper use in accordance with 29 CFR 1910.134(g). Our company ensures that respirators are used properly in the workplace.

MAINTENANCE AND CARE PROCEDURES

Since we use only disposable face masks it is not necessary to have a maintenance schedule or procedures.

STORAGE

Since we use only disposable face masks it is not necessary to have a storage procedure.

INSPECTION, REPAIR, AND DISCARDING

Since we use only disposable face masks we only inspect each respirator for damage before use and discard if damaged, torn, or dirty.

TRAINING

Employee training is an important part of the respiratory protection program and is essential for correct respirator use. Our training program provided by the safety committee chairman or a designee from the safety committee is two-fold; it covers both the:
1. Respiratory hazards to which our employees are potentially exposed during routine and emergency situations, and
2. Proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance.

Both training parts are provided prior to requiring an employee to use a respirator in our workplace. However, if an employee has received training within 12 months addressing the seven basic elements of respiratory protection (see below) and the employee can demonstrate the required knowledge of those elements, then the employee is not required to repeat the training. We do require all of our employees to be retrained annually and when the following situations occur:
• Changes in the workplace or the type of respirator render previous training obsolete;
• Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill; or
• Any other situation arises in which retraining appears necessary to ensure safe respirator use.

Seven basic elements:
Our employees are trained sufficiently to be able to demonstrate a knowledge of at least these seven elements:
1. Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect
of the respirator.
2. What the limitations and capabilities of the respirator are.
3. How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions.
4. How to inspect, put on, remove, use, and check the seals of the respirator.
5. What the procedures are for maintenance and storage of the respirator.
6. How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.

INFORMATION FOR EMPLOYEES USING RESPIRATORS WHEN NOT REQUIRED UNDER THE STANDARD

The following basic advisory information on respirators is provided to employees who wear respirators when such use is not required by the regulations or by our company:

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If you voluntarily use a respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:
1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator’s limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else’s respirator.

PROGRAM EVALUATION

It is inherent in respirator use that problems with protection, irritation, breathing resistance, comfort, and other respirator-related factors occasionally arise in most respirator protection programs. Although it is not possible to eliminate all problems associated with respirator use, we try to eliminate as many problems as possible to improve respiratory protection and encourage employee acceptance and safe use of respirators. By having our program administrator, the Operations Manager, thoroughly evaluate and, as necessary, revise our Respiratory Protection Program, we can eliminate problems effectively.

At Corrosion Materials, program evaluation, performed annually by our program administrator, involves the following:
• Conducting evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.
• Regularly consulting employees required to use respirators to assess their views on program effectiveness and to identify any problems. Any problems that are identified during this assessment must be corrected. Factors to assess include, but are not limited to:
  • Respirator fit (including the ability to use the respirator without interfering with effective workplace performance)
• Appropriate respirator selection for the hazards to which the employee is exposed
• Proper respirator use under the workplace conditions the employee encounters
• Proper respirator maintenance

REFERENCES:
The following documents are helpful references:
• 29 CFR 1910.134, Respiratory Protection, and Appendices,
• 42 CFR 84, Approval of Respiratory Protective Devices,
• ANSI Z88.2, Respiratory Protection,
• NIOSH Guide to Industrial Respiratory Protection-1987 (however, this may be out of date),
EYE PROTECTION

EYE PROTECTION MUST BE WORN AT ALL TIMES WITHIN THE SHOP AREA. THIS INCLUDES ALL AREAS WITHIN THE MACHINE SHOP, PIPE SHOP, WELD SHOP, BAR SHOP, PLATE SHOP, AND ALL AREAS OF THE WAREHOUSE.

ANY ONE NOT WEARING THE PROPER EYEWEAR FOR THE JOB OR LOCATION WILL BE SUBJECT TO DISCIPLINARY ACTION INCLUDING TERMINATION.
KEVLAR SLEEVES

Kevlar forearm guards must be worn by all employees performing banding operations. Corrosion materials will supply the fore arm guards, but it is the individual employee’s responsibility to keep the guard clean.

CLEANING PROCEDURE - MACHINE WASHING:
1. Remove all large particles from the arm guards
2. Rinse thoroughly in cold water
3. If presoaking use luke warm water and a mild detergent, but no bleach
4. Place in washing machine with mild detergent
5. Wash, normal cycle, warm water 10 – 15 minutes
6. Tumble dry at a temperature below 160 F for no longer than 10 minutes.

CUT RESISTANCE - These sleeves are cut resistant not cut proof. Cut resistance is a function of the sleeve’s material composition and thickness.

The following sleeve is approved for use: Medium Duty Armguards #333477 10" Forearm sleeve, gray.

EMERGENCY ACTION PLAN

PURPOSE

This plan applies to all operations in our company where employees may encounter an emergency situation. The EMERGENCY ACTION PLAN communicates to employees, policies and procedures to follow in emergencies. This plan informs our employees about:
1. Emergency escape procedures and route assignments
2. Procedures to be followed by employees who remain to control critical plant operations before they evacuate
3. Procedures to account for all employees after emergency evacuation has been completed
4. Rescue and medical duties for those employees who perform them
5. Preferred means of reporting fires and other emergencies
6. Types of evacuations to be used in various emergency situations, and
7. The alarm system
EMERGENCY ESCAPE PROCEDURES AND ASSIGNMENTS

Our emergency escape procedures and assignments are designed to respond to many potential emergencies including fires, and natural disasters such as flood, tornado, hurricane, and hard freeze. There are alternate procedures for responding to an emergency, depending on what the emergency is. The following guidelines apply to all Emergency Action Plans:

1. All employees are trained in safe evacuation procedures, and refresher training is conducted whenever the employee's responsibilities or designated actions under the plan change, and whenever the plan itself is changed. In addition, we review with each employee the parts of the plan the employee must know to protect himself in the event of an emergency.

2. The training includes use of floor plans and workplace maps which clearly show exits to be used. These floor plans and maps are available and posted at all times in every area of the company to provide guidance in an emergency.

3. No employee is permitted to re-enter the building until advised by the Safety Manager (after determination has been made that such re entry is safe).

4. All employees evacuate to the Northeast corner of the parking lot next to the truck entrance. Each department's personnel will report to their immediate supervisor. The domestic sales manager will ensure that all employees are accounted for.

NO EMPLOYEES ARE TO REMAIN BEHIND DURING EVACUATION FOR ANY REASON.

Each department manager or supervisor will conduct a head count once evacuation has been completed. There is at least one trained evacuation person for each twenty employees in the workplace to provide adequate guidance and instruction at the time of an emergency. The supervisors and managers are trained in the complete workplace layout and the various alternative escape routes from the workplace. All trained personnel are made aware of employees with disabilities who may need extra assistance, such as using the buddy system, and of hazardous areas to be avoided during emergencies. Before leaving, these employees check rooms and other enclosed spaces in the workplace for employees who may be trapped or otherwise unable to evacuate the area. The list of trained personnel appears below:

GENERAL MANAGER
EXPORT MANAGER
QC MANAGER
PURCHASING MANAGER
PC / SHIPPING SUPERVISOR
MACHINE SHOP SUPERVISOR
MATERIAL PROCESSING SUPERVISOR
MACHINE SHOP 2ND SHIFT LEAD
2ND SHIFT MATERIAL PROCESSING LEAD
MAINTENANCE MANAGER
OPERATIONS MANAGER

Once each evacuated group of employees has reached the assembly area, each trained evacuation employee:
* Takes roll of his or her group.
* Makes sure all persons are accounted for.
* Reports in to a central checkpoint managed by the Safety Committee.
* Assumes role of department contact to answer questions.

**RESCUE AND MEDICAL DUTY ASSIGNMENTS**

Rescue and medical aid may be necessary during emergency situations. Emergency Response Team (ERT) members are responsible for performing rescue duties in case of an emergency requiring rescue. Members of the ERT include all department managers.

Although we do not have designated first aid providers, First aid may be provided by trained employees within their capabilities. Professional emergency services responding in an emergency will help with and direct all rescue and medical duty assignments upon their arrival on site.

**EMERGENCY REPORTING PROCEDURES**

**In the Event of a Fire** When a fire is detected, go to the nearest security system station and activate the alarm by pressing the left hand button with the red fire label on the key pad. The alarms will notify the Emergency Response Team as well as the Baker, La. Fire Department. Security system key pads are located on each floor as indicated on the building floor plan / evacuation route map.

The Emergency Response Team will perform assigned duties and will meet the fire department to assist them in putting out the fire. Head counts should be given to the Baker, La. Fire Chief or fire fighter in charge. No employees are to return to the buildings until the "all clear" is given by the Emergency Response Team leader or the Baker, La. Fire Chief.

**In the Event of a Tornado** When a tornado watch has been issued by the National Weather Service, the Safety Manager or his designee will access the National Weather Service reports either by radio or the Internet. The Safety Manager will notify employees of tornado warnings only. In the event of a tornado, it is corporate policy to provide emergency warning only.

**TRAINED EVACUATION PERSONNEL**

A sufficient number of employees have been designated by the company and trained to assist in safe and orderly emergency evacuation for all types of emergency situations. The list of people trained includes at least one person from every area for every shift. These employees are to help direct all employees during emergency evacuation, serve as a resource of information about emergency procedures, and conduct head counts once evacuation has been completed. A copy of the list of trained personnel appears below:

**Title Department Shift:**
GENERAL MANAGER
EXPORT MANAGER
QC MANAGER
PURCHASING MANAGER
PC / SHIPPING SUPERVISOR
MACHINE SHOP SUPERVISOR
MATERIAL PROCESSING SUPERVISOR
MACHINE SHOP 2ND SHIFT LEAD
2ND SHIFT MATERIAL PROCESSING LEAD
OPERATIONS MANAGER
ALL DEPARTMENT SUPERVISORS
SAFETY MANAGER RESPONSIBILITIES

The Safety Manager is responsible for the following activities. He or she must:
1. Develop a written Emergency Action Plan for regular and after hours work conditions.
2. Immediately notify the local fire or police departments in the event of an emergency.
3. Integrate the Emergency Action Plan with the existing general emergency plan.
4. Distribute procedures for reporting a fire or other emergency, the location of fire exits, and evacuation routes to each employee.
5. Conduct drills to acquaint the employees with emergency procedures, and to judge the effectiveness of each plan. Semi-annual fire drills are required.
6. Satisfy all local fire codes and regulations as specified.
7. Train designated employees in the use of fire extinguishers and the application of medical first aid techniques.
8. Keep key management personnel home telephone numbers in a safe place in the office for immediate use in the event of an emergency. Distribute a copy of the list to key persons to be retained in their homes for use in communicating an emergency occurring during non-work hours.
9. Decide to remain in or evacuate the workplace in the event of an emergency.
10. If evacuation is deemed necessary, the safety manager ensures that:  
    * All employees are notified and a head count is taken to confirm total evacuation of all employees.  
    * When practical, equipment is placed and locked in storage rooms or desks for protection.  
    * Arrange as necessary, security measures to protect employee records and property.

TRAINING

At the time of an emergency, employees should know what type of evacuation is necessary and what their role is in carrying out the plan. In cases where the emergency is very grave, total and immediate evacuation of all employees is necessary. In other emergencies, a partial evacuation of nonessential employees with a delayed evacuation of others may be necessary. We must be sure that employees know what is expected of them during an emergency to assure their safety. In addition, training on the plan's content is required by OSHA. All employees will be given a thorough presentation followed by a drill. Our local fire department requires semi-annual fire drills, so we cover related Emergency Action Plan information at that time.

Types of Emergency Evacuations   At this company the following types of emergency evacuation exists as detailed earlier in this plan:
    1. FIRE
    2. NATURAL DISASTER.
FIRE PREVENTION

PURPOSE

This plan applies to all operations in our company where employees may encounter a fire. The purpose of this fire prevention plan is to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire. This plan addresses the following issues:

* Major workplace fire hazards and their proper handling and storage procedures.
* Potential ignition sources for fires and their control procedures.
* The type of fire protection equipment or systems which can control a fire involving them.
* Regular job titles of personnel responsible for maintenance of equipment and systems installed to prevent or control ignition of fires and for control of fuel source hazards.

Under this plan, our employees will be informed of the plan's purpose, preferred means of reporting fires and other emergencies, types of evacuations to be used in various emergency situations, and the alarm system. The plan is closely tied to our emergency action plan where procedures are described for emergency escape and route assignments, procedures to account for all employees after emergency evacuation has been completed, and rescue and medical duties for those employees who perform them. Please see the emergency action plan for this information.

SAFETY MANAGER RESPONSIBILITIES

The CORROSION MATERIALS, Safety Manager is responsible for the following activities:

1. Develop a written fire prevention plan for regular and after-hours work conditions.
2. Immediately notify the Baker, La. fire department and the Corrosion Materials general manager in the event of a fire.
3. Integrate the fire prevention plan with the existing general emergency plan covering the building.
4. Distribute procedures for reporting a fire, the location of fire exits, and evacuation routes to each employee.
5. Conduct drills to acquaint the employees with fire procedures, and to judge their effectiveness.
6. Satisfy all local fire codes and regulations as specified.
7. Train designated employees in the use of fire extinguishers and the application of medical first-aid techniques.
8. Keep key management personnel home telephone numbers in a safe place in the office for immediate use in the event of a fire. Distribute a copy of the list to key persons to be retained in their homes for use in communicating a fire occurring during non-work hours.
9. Decide to remain in or evacuate the workplace in the event of a fire.
10. If evacuation is deemed necessary, the safety manager ensures that:
    *All employees are notified and a head count is taken to confirm total evacuation of all employees.
    *When practical, equipment is placed and locked in storage rooms or desks for protection.
    *The building owner/superintendent is contacted, informed of the action taken, and asked to assist in coordinating security protection.
    *In locations where the building owner/superintendent is not available, security measures to protect employee records and property are arranged as necessary.

WORKPLACE FIRE HAZARDS

It is our intent to assure that hazardous accumulations of combustible waste materials are controlled so that a fast developing fire, rapid spread of toxic smoke, or an explosion will not occur. Employees are to be made aware of the hazardous properties of materials in their workplaces, and the degree of hazard each poses.
**FIRE HAZARD ANALYSIS RESULTS:**

<table>
<thead>
<tr>
<th>LOCATION</th>
<th>POTENTIAL FUEL SOURCE</th>
<th>POTENTIAL SOURCE OF IGNITION</th>
<th>RECOMMENDED ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>OFFICES</td>
<td>Waste baskets</td>
<td>Electric space heaters</td>
<td>Keep combustible mater away from sources of ignition</td>
</tr>
<tr>
<td></td>
<td>Shred boxes</td>
<td>Electrical appliances</td>
<td>Turn off equipment when not in use</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Electrical extension cords</td>
<td>Keep extension cords away from foot traffic areas</td>
</tr>
<tr>
<td>MACHINE SHOP</td>
<td>I. D. Red cleaning solution.</td>
<td>Electrical equipment</td>
<td>Keep all sources of ignition at a safe distance</td>
</tr>
<tr>
<td></td>
<td>Black cutting oil</td>
<td>Grinding sparks</td>
<td>Keep fire extinguishers serviced and in good working order</td>
</tr>
<tr>
<td>MATERIAL PROCESSING</td>
<td>Combustible plasma</td>
<td>Plasma torch</td>
<td>Cut under water as much as possible</td>
</tr>
<tr>
<td></td>
<td>vent gases</td>
<td>Plate saw</td>
<td>Keep fire extinguishers charged and working</td>
</tr>
<tr>
<td></td>
<td>Propane - fork lift fuel</td>
<td>Abrasive saw sparks</td>
<td>Ensure fork lift fuel tank fittings are tight</td>
</tr>
<tr>
<td></td>
<td>Natural gas</td>
<td>Grinding sparks</td>
<td>Inspect fork lift fuel lines every time tank is changed</td>
</tr>
<tr>
<td></td>
<td>Paint</td>
<td>Heaters/pilot lights</td>
<td>Keep flammable paint and solvents stored in proper containers and cabinet</td>
</tr>
<tr>
<td></td>
<td>Solvents</td>
<td>Cigarettes, etc.</td>
<td>Keep proper labeling on flammables</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Designate smoking areas</td>
</tr>
<tr>
<td>SHIPPING</td>
<td>Saw dust</td>
<td>Electrical equipment</td>
<td>Ensure all electrical equipment is properly maintained</td>
</tr>
<tr>
<td></td>
<td>Propane fuel</td>
<td>Heaters/pilot lights</td>
<td>Clean up saw dust, wood, paper, and cardboard</td>
</tr>
<tr>
<td></td>
<td>Natural gas</td>
<td>Cigarettes, etc.</td>
<td>Inspect fork lift fuel lines every time the tank is changed</td>
</tr>
<tr>
<td></td>
<td>Wood</td>
<td></td>
<td>Provide proper disposal containers for cigarettes</td>
</tr>
<tr>
<td></td>
<td>Paper</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cardboard</td>
<td></td>
<td></td>
</tr>
<tr>
<td>LOCATION</td>
<td>POTENTIAL FUEL SOURCE</td>
<td>POTENTIAL SOURCE OF IGNITION</td>
<td>RECOMMENDED ACTION</td>
</tr>
<tr>
<td>WELD SHOP</td>
<td>I. D. Red</td>
<td>Welding arcs</td>
<td>Keep all fuel sources at least 10 ft. from welding arcs and at least 20 ft. from grinding sparks</td>
</tr>
<tr>
<td></td>
<td>Liquefied petroleum gas</td>
<td>Grinding sparks</td>
<td></td>
</tr>
</tbody>
</table>

Fire prevention measures must be developed for all fire hazards found. Once employees are made aware of the fire hazards in their work areas, they must be trained in the fire prevention measures developed and use them in the course of their work. For example, oil soaked rags must be treated differently than general paper trash in office areas. In addition, large accumulations of waste paper or corrugated boxes, etc., can pose a significant fire hazard. Accumulations of materials which can cause large fires or generate dense smoke that are easily ignited or may start from spontaneous combustion, are the types of materials with which this fire prevention plan is concerned. Such
Combustible materials may be easily ignited by matches, welder’s sparks, cigarettes and similar low level energy ignition sources.

It is our intent to prevent such accumulation of materials by storing flammable liquids in fire resistant cabinets, by periodically removing combustible materials such as paper and wood products from trash containers and placing them in a dumpster located outside the building, and by storing all propane tanks for the fork lifts in a clearly marked rack located outside the building. Other fire prevention measures include but are not limited to ensuring that all electric motors are equipped with thermal overload shutdowns and that all electric space heaters are equipped with tip over switches.

Fuel is used throughout the plant as an energy source for various systems or equipment. There are three types of fuel used at Corrosion Materials. These fuels must be monitored and controlled since they pose a significant fire hazard. The three fuels are gasoline, diesel, and propane. These fuels must always be stored in approved containers away from possible sources of ignition. When refueling the tractor or lawn equipment, all manufacturers suggested safety measures must be followed. When changing a fork lift propane tank, all sources of ignition within 50 feet must be extinguished and the connection checked for leaks before starting the fork lift.

**POTENTIAL IGNITION SOURCES**

Flammable or combustible materials usually do not ignite without an external source of ignition. The following procedures are used to control known ignition sources at this company:

<table>
<thead>
<tr>
<th>IGNITION SOURCE</th>
<th>CONTROL PROCEDURES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electric space heaters</td>
<td>Keep combustible mater away from the heater</td>
</tr>
<tr>
<td></td>
<td>Turn off when not in use</td>
</tr>
<tr>
<td></td>
<td>Inspect and test periodically to ensure that the tip over switch works and that the switch and thermostat are working and that the cord is not damaged.</td>
</tr>
<tr>
<td>Electrical appliances and other</td>
<td>Turn off equipment when not in use</td>
</tr>
<tr>
<td>electrical equipment</td>
<td>Inspect and test periodically for proper operation and that the cord is not damaged.</td>
</tr>
<tr>
<td>Electrical extension cords</td>
<td>Inspect to ensure that the cord is not damaged.</td>
</tr>
<tr>
<td>Shop electrical equipment</td>
<td>Turn off equipment when not in use</td>
</tr>
<tr>
<td></td>
<td>Inspect and test periodically for proper operation and that the cord is not damaged.</td>
</tr>
</tbody>
</table>

**IGNITION SOURCE**

<table>
<thead>
<tr>
<th>IGNITION SOURCE</th>
<th>CONTROL PROCEDURES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinding sparks</td>
<td>Keep all fuel sources at a safe distance</td>
</tr>
<tr>
<td></td>
<td>Keep fire extinguishers serviced and close to source</td>
</tr>
<tr>
<td></td>
<td>Use guards / deflectors to direct sparks away from combustible materials</td>
</tr>
<tr>
<td>Hot cutting chips</td>
<td>Keep all fuel sources at a safe distance</td>
</tr>
<tr>
<td></td>
<td>Keep fire extinguishers serviced and close to source</td>
</tr>
<tr>
<td>Plasma torch</td>
<td>Cut under water as much as possible</td>
</tr>
<tr>
<td></td>
<td>Keep all fuel sources at a safe distance</td>
</tr>
<tr>
<td></td>
<td>Maintain the plasma machine in proper working order</td>
</tr>
</tbody>
</table>
Inspect all electrical connections, motors, solenoids and other electrical components on a regular basis
Keep power supply unit clean
Keep fire extinguishers serviced and close to source

Plate saw and Abrasive saw sparks
Keep all fuel sources at a safe distance
Maintain the saws in proper working order
Inspect all electrical connections, motors, and other electrical components on a regular basis
Keep fire extinguishers serviced and close to source

Gas heaters/pilot lights in shop
Keep all fuel sources at a safe distance
Maintain the heaters in proper working order
Inspect all gas and electrical connections, fan motors, gas valves and thermostats on a regular basis

Welding arcs
Keep all fuel sources at least 10 ft. from welding arcs
Ensure that the welding machines and equipment are properly maintained
Keep fire extinguishers charged and working

Cigarettes, etc.
Designate smoking areas
Provide proper disposal containers

FIRE PROTECTION EQUIPMENT

Fire protection equipment, selected and purchased by the Safety Committee and the Maintenance Manager, in use at this company includes “ABC” type and HALON extinguishers to protect from the various types of fire hazards possible here. In addition, a fire alarm system is also present to alert personnel to the presence of a fire. Alarm activation switches are located at various places throughout the plant as indicated on the building floor plan in the appendix.

MAINTENANCE OF FIRE PROTECTION EQUIPMENT

Once hazards are evaluated and equipment is installed to control them, that equipment must be monitored on a regular basis to make sure it continues to function properly. The Safety Committee and the Maintenance Manager are responsible for maintaining equipment and systems installed to prevent or control fires. These individuals follow strict guidelines for maintaining the equipment. Fire extinguishers are immediately refilled when used. Fire extinguishers are also checked by an outside supplier annually and charged, repaired or replaced as required.

HOUSEKEEPING PROCEDURES

Our company controls accumulations of flammable and combustible materials so that they do not contribute to a fire. We have identified the following potential hazards in our facility:

- oily rags
- paper trash in office areas
- waste paper, corrugated boxes, and wood in the shop/shipping/receiving areas
- flammable liquids
- propane tanks
The following procedures have been developed to eliminate or minimize the risk of fire due to improperly stored or disposed of materials.
1. Oil soaked rags are put in air tight containers until picked up by the provider
2. Paper trash in office areas is removed every day
3. Waste paper, cardboard, and wood scraps are picked up and disposed of in a dumpster outside the building
4. Flammable liquids are stored in a flame resistant cabinet specially designed for flammable liquids storage
5. Propane tanks are stored in a special rack located outside the building
CRANE SAFETY

The written Crane Safety Procedures establish guidelines to be followed whenever any of our employees work with cranes. The rules are established to:

• Provide a safe working environment,
• Govern operator use of cranes, and
• Ensure proper care and maintenance of cranes.

These procedures establish uniform requirements designed to ensure that crane safety training, operation, and maintenance practices are communicated to and understood by the affected employees. These requirements are also designed to ensure that procedures are in place to protect the health and safety of all employees.

CRANES AT OUR WORKPLACE

Corrosion Materials uses the following cranes:

<table>
<thead>
<tr>
<th>Make, model, and serial number:</th>
<th>Type:</th>
<th>Quantity:</th>
<th>Purpose and location:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demag 90270</td>
<td>2 ton overhead floor controlled</td>
<td>1</td>
<td>Bar Department</td>
</tr>
<tr>
<td>Demag 97763</td>
<td>5 ton overhead floor controlled</td>
<td>1</td>
<td>Plate Shop North</td>
</tr>
<tr>
<td>Demag 97762</td>
<td>5 ton overhead floor controlled</td>
<td>1</td>
<td>Plate Shop South</td>
</tr>
<tr>
<td>Demag 94493</td>
<td>5 ton overhead floor controlled</td>
<td>1</td>
<td>Pipe Shop</td>
</tr>
<tr>
<td>Spanco 9802157b</td>
<td>2 ton jib</td>
<td>1</td>
<td>Large Shear</td>
</tr>
<tr>
<td>Spanco 9801257a</td>
<td>1 ton jib</td>
<td>1</td>
<td>Small Shear</td>
</tr>
</tbody>
</table>

TRAINING

It is the policy of Corrosion Materials to permit only trained and authorized personnel to operate cranes. The Material Processing and Shipping Supervisors will identify all new employees and make arrangements with department management to schedule training.

Before we begin training a new employee the Safety Committee determines if the potential crane or derrick operator is capable of performing the duties necessary to be a competent and safe operator. This is based upon his/her physical and mental abilities to perform job functions that are essential to the operation of the crane. These capabilities include the level at which the operator must:

• See and hear within reasonably acceptable limits. This includes the ability to see at distance and peripherally;
• Endure the physical demands of the job.

The Safety Committee Chairman or a designee will conduct initial training and evaluation.

INITIAL TRAINING

Our classroom instruction includes a video tape, lecture, and question and answer. Classroom instruction, itself, covers the following topics: crane design and construction, inspections, load preparation and attachment, moving the load, completing the job, working with signals. Our practical training is hands on instruction. All crane operators are trained and tested on the equipment they will be operating.

TRAINING CERTIFICATION

After an employee has completed the training program, the instructor will administer a performance test or practical exercise to determine whether the potential operator can safely perform the job. At this point the instructor will determine if the training has been adequate. The corporate safety representative is responsible for keeping records and certifying that each operator has successfully completed training and testing. Each certificate includes the name
of the operator, the date(s) of the training, and the signature of the person who did the training and evaluation.

INSPECTIONS

INITIAL INSPECTIONS
Our company inspects and tests all cranes to ensure they are capable of safe and reliable operation when initially set or placed in service and after any major repairs or design modification. The Maintenance Manager is responsible for these inspections and tests.

FREQUENT INSPECTIONS
The company requires pre-operational crane checks prior to beginning each shift. The operator walks around the crane looking for defects or problem areas. Components that have a direct bearing on the safety of the crane and whose status can change from day to day with use, must be inspected daily, and when possible, observed during operation for any defects that could affect safe operation.

PRE-SHIFT INSPECTION
Inspection of all cranes and equipment will be made at the start of each shift and during usage to make sure they are in a safe operating condition. This inspection is the responsibility of each operator. Any deficiencies will be repaired, or defective parts replaced, before the equipment can be used. A checklist for daily inspection of cranes, derricks, and equipment includes, but is not limited to, the following: the control unit for damage, fast/slow switches, crane movement in all directions, braking system, wire rope, hook and safety latch, upper and lower limit switches

PERIODIC INSPECTIONS
Periodic inspections include both monthly and annual inspections.

Monthly Periodic Inspection The monthly periodic inspection interval may vary depending on crane use and observed conditions. The monthly inspection, performed by a maintenance department person, includes those items listed for daily inspections and the condition of the electrical circuits and control

Annual Periodic Inspection A thorough, annual inspection of the crane is made by the maintenance department.

MAINTENANCE
Any deficiencies found in our cranes are repaired, or defective parts replaced, before continued use. However, no modifications or additions that affect the capacity or safe operation of the equipment may be made without the manufacturer’s written approval. If such modifications or changes are made, the capacity, operation, and maintenance instruction plates, tags, or decals, must be changed accordingly. In no case may the original safety factor of the equipment be reduced. The Maintenance Manager is responsible for ensuring the cranes are capable of safe and reliable operation after any major repair or design modification.

While defective parts may be found, we prefer to invest time and effort into the proper upkeep of our equipment, which results in day to day reliability. Keeping up with the manufacturer’s recommended maintenance schedules, and completing the proper records, will also increase our cranes’ longevity.

The Maintenance Manager complete(s) a receiving or delivery inspection whenever our company purchases cranes, and he/she/they performs the recommended "breaking in" inspections and maintenance. The maintenance department follow(s) the manufacturer’s operator instruction manual for daily maintenance. Periodic maintenance (those completed monthly or less frequently) is done by our maintenance personnel.

POSTING
Rated load capacities, special hazard warnings, or instructions, are posted and visible to the operator while using the crane.

**RECORD KEEPING & CERTIFICATION**

The Maintenance Manager is responsible for maintaining the following records on file in his office:

- The log of all monthly periodic inspections on critical items in use (i.e., brakes, crane hooks, and ropes), and include:
  - The date the crane items were inspected,
  - The signature of the person who inspected the crane items,
  - A serial number, or other identifier, for the crane inspected, and
  - The most recent certification record (maintained on file until a new one is prepared).
- The most recent monthly periodic inspection (certification) record.
- A record of the annual inspection for each hoisting machine and piece of equipment used, including the dates and results of the inspection.
- Inspection reports for the annual magnetic particle or other suitable crack detecting inspection.
- Maintenance records.
- Any results of any equipment specifications and limitations made by a qualified engineer.
- Any written approval from the manufacturer of any modifications or additions that affect the capacity or safe operation of our equipment. In no case will the original safety factor of the equipment be reduced.
COMPRESSED GAS PLAN

PURPOSE

It is the policy of Corrosion Materials to permit only trained employees to handle, store, use, and inspect compressed gases and equipment. This written Compressed Gas Plan describes methods and practices for care and use of compressed gases. This written plan is intended to:

☐ Create an awareness of the hazards among our workforce,
☐ Standardize procedures for use and care of the equipment,
☐ Provide a consistent format for training employees on the proper procedures to be used,
☐ Minimize the possibility of injury or harm to our employees, and
☐ Demonstrate Corrosion Materials's compliance with OSHA's compressed gas requirements.

LIST OF COMPRESSED GASES AND EQUIPMENT

The compressed gases used include the following: Argon, Liquid Nitrogen, Propane, Propylene, Acetylene, and Oxygen. The compressed gas equipment used at this company is compressed gas cylinders.

INSPECTION PROCEDURES

The Operations Manager is qualified to determine, by visual inspection, that compressed gas cylinders are in a safe condition. Cylinders are inspected monthly. Our inspections are conducted as prescribed by the Compressed Gas Association Pamphlet C-6-1968 (Standards for Visual Inspection of Steel Compressed Gas Cylinders). If a cylinder is found to be unfit in its present condition, then the Operations Manager must determine whether it can be repaired or must be scrapped.

HANDLING PROCEDURES

Compressed gases are considered to be handled when employees perform any of the following activities:

☐ Identify contents;
☐ Change gas service, maintain and move containers; and
☐ Connect containers.

We follow the safe handling procedures found in the CGA pamphlet series, including the P-1-1991 pamphlet. Our handling procedures include the following:

☐ Identify a gas and its dangers before using it. Look for this information on labels, MSDSs, and cylinder markings. If you don't know what's in a cylinder, don't use it.
☐ Examine cylinders as soon as you receive them. If you detect signs of damage or leakage, move them to a safe, isolated area and return them to the supplier as soon as possible.
☐ Use only regulators, pressure relief devices, valves, hoses, and other auxiliary equipment that is designed for the specific container and compressed gas/cryogenic liquid to be used.
☐ Do not interchange equipment between different types of gases.
☐ Make sure valves, hoses, connectors, and regulators are in good condition. Don't use cylinders without them.
☐ Use pressure relief devices and safety devices to help maintain cylinder or system pressure at the desired levels. (Exceeding the desired pressure could damage the cylinder or system.)
☐ Check to see if regulators, hoses, and gauges can be used with different gases. Assume they cannot.
☐ Never open valves until regulators are drained of gas and pressure-adjusting devices are released. When opening cylinders, point outlets away from people and sources of ignition, such as sparks or flames. Open valves slowly.
On valves without hand wheels, use only supplier-recommended wrenches. On valves with hand wheels, never use wrenches.

☐ Do not tamper with connections and do not force connections together.
☐ Do not hammer valves open or closed.
☐ Do not drop, bang, slide, clank, or roll cylinders.
☐ Cylinders may be rolled along the bottom rim.
☐ Don't let cylinders fall or have things fall on them.
☐ Don't lift a cylinder by its cap unless using hand trucks so designed.
☐ Use carts or other material handling equipment to move cylinders. Use ropes and chains to move a cylinder only if the cylinder has special lugs to accommodate this. Some cylinders may require special hand trucks.
☐ Keep cylinders secured and upright. (But never secure cylinders to conduit carrying electrical wiring.)
☐ When transporting compressed gas cylinders, be sure the vehicle is adequately equipped to haul compressed gases safely. Stop the engine while loading or unloading flammable compressed gases.
☐ Don't drive a vehicle hauling liquefied hydrogen through a tunnel.
☐ Know accident procedures.

STORAGE PROCEDURES

The following activities are involved in safely storing compressed gases:
☐ Post areas where gases are present,
☐ Group gases,
☐ Separate combustibles,
☐ Avoid corrosives or areas where container damage can occur,
☐ Position containers properly, and
☐ Use indoor and outdoor storage appropriately.

We follow the safe storage procedures found in the CGA pamphlet series, including the P-1-1991 pamphlet. Our storage procedures for compressed gases include the following:
☐ Store cylinders upright.
☐ When a cylinder is in storage, keep the steel protective cap screwed on. This step reduces the chance that a blow to the valve will allow gas to escape.
☐ Group cylinders by types of gas.
☐ Store full and empty cylinders apart.
☐ Store gases so that old stock is removed and used first.
☐ To keep cylinders from falling over, secure them with chains or cables.
☐ Store compressed gas containers in dry, well-ventilated areas away from exits and stairways. If outside, store containers off the ground and out of extremely hot or cold environments.
☐ Do not store compressed gas containers in high pedestrian and vehicle traffic areas. (Containers are more likely to be damaged there.)
☐ Store oxygen cylinders at least 20 feet from flammables or combustibles or separate them by a 5-foot, fire-resistant barrier.
☐ Keep oil and grease away from oxygen cylinders, valves, and hoses.
☐ If your hands, gloves, or clothing are oily, do not handle oxygen cylinders.
☐ Make sure fire extinguishers near the storage area are appropriate for gases stored there.
☐ Post signs stating the name(s) of gas present and NO SMOKING where gases are stored.

USAGE PROCEDURES

Safe use of compressed gases involves the following activities:
☐ Properly handle leaking containers,
☐ Prevent abuse,
☐ Identify contents,
We follow the safe usage procedures found in the CGA pamphlet series, including the P-1-1991 pamphlet. Our procedures for using compressed gases include the following:

- Remove any leaking containers to a well-ventilated area and post a warning of the hazard.
- Shut a leaking valve and tighten the valve gland or nut. Then try opening the valve; if it still leaks, close it and tag the container unserviceable.
- Make sure labels are legible before using containers; otherwise, return the containers to the supplier.
- Do not misuse containers (i.e., using them for support); only use them as they were intended.
- Keep containers away from fire, sparks, and electricity.
- Don't smoke or allow others to smoke in the vicinity of flammable compressed gas containers.
- Do not subject containers to extreme heat or cold.
- Use a respirator or SCBA (self-contained breathing apparatus) according to 29 CFR 1910.134 when using toxic compressed gas.
- Contact the manufacturer/supplier with questions about safe handling.
- Always keep removable caps and valve outlet caps/plugs on containers except when connecting to dispensing equipment.
- Do not use oxygen and compressed air interchangeably. They are not the same.
- Comply with ANSI Z49.1 when using or storing oxyfuel-gas containers for welding and cutting and other similar activities.
- When empty, close and return cylinders. Empty cylinders must be marked MT or Empty. Empty acetylene cylinders must be so labeled.
- Be sure valves are closed when not using the container and before returning containers. Properly label returning containers.
- Do not refill non-refillable containers once they are empty.

**COMPRESSED GAS EMERGENCY PROCEDURES**

In an emergency, the Operations Manager may seek advice from the Chemical Transportation Emergency Center, known as CHEMTREC, which can be reached 24 hours a day by dialing (800) 424-9300. This service is provided by the Chemical Manufacturers Association. Refer to our written emergency action plan for employee escape procedures and assignments during a compressed gas emergency.

**TRAINING PROGRAM**

The Operations Manager is responsible for training personnel who will handle, store, or use a compressed gas. Under no circumstances will an employee handle, store, or use a compressed gas until he/she has successfully completed this company's compressed gas training program. This includes all new workers who will handle, store, and use compressed gases, regardless of claimed previous experience. Individuals in the following departments receive training: Weld Shop and Material Processing. The department supervisor is responsible for identifying all new employees and making arrangements with department management to schedule their training.

General training elements include the following:

- Compressed gases and equipment at the company.
- Hazards of compressed gases and equipment at the company.
- Inspection procedures.
- Handling procedures.
- Storage procedures.
- Usage procedures.
- Compressed gas emergency procedures.
PROGRAM EVALUATION

The Corrosion Materials Safety Committee is responsible for evaluating and updating this written plan. The evaluation will include a review of reported accidents, as well as near misses, to identify areas where additional safety measures need to be taken. The Corrosion Materials Safety Committee will also conduct a periodic review to determine the effectiveness of the program. This review may include:

☐ A walk-through of the facility, and
☐ Interviews with employees to determine whether they are familiar with the requirements of this program and if safety measures are being practiced.
Fall Protection Plan

PURPOSE

Written fall protection procedures establish guidelines to be followed whenever an employee works on ladders, or at heights. The rules established are to be followed to provide a safe working environment. The effectiveness of the written fall protection procedures depends upon the active support and involvement of all employees. These written fall protection procedures establish uniform requirements designed to ensure that fall protection training, operation, and practices are communicated to and understood by the affected employees. These requirements are also designed to ensure that procedures are in place to safeguard the health and safety of all employees. It is the policy of Corrosion Materials to permit only employees trained in fall protection procedures to work in areas where fall hazards occur, to reduce likelihood of fall accidents and to help ensure a safe workplace.

LIST OF AFFECTED AREAS

The following table lists all areas with fall hazards, the type of fall hazard in the area, and the employees who are affected by the fall hazard:

<table>
<thead>
<tr>
<th>Area/Department</th>
<th>Type of Fall Hazard</th>
<th>Employees Affected</th>
</tr>
</thead>
<tbody>
<tr>
<td>pipe department</td>
<td>ladders</td>
<td>all pipe department operators</td>
</tr>
<tr>
<td>shipping loading dock</td>
<td>docks</td>
<td>all shipping personnel</td>
</tr>
<tr>
<td>plate pit area</td>
<td>catwalks</td>
<td>all plate personnel</td>
</tr>
</tbody>
</table>

PRE-WORK CHECK

Prior to beginning work in any area or on any device where fall hazards exist, a pre-work check must be completed that includes the following items:

**Stairs**
- All handrails or guardrails are in place on stairways.
- All treads and risers on stairs are in good repair.
- Non-slip surfaces are in place on stairs.
- All stairs meet OSHA and ANSI specifications for design and safety.

**Ladders**
- Gripping safety feet in place and secure on ladders.
- Wooden ladders are coated with suitable protective material.
- All parts and fittings on ladders are secure.
- Non-slip surfaces are in place on ladder rungs.
- When setting ladder up, footing of ladder is secure on a firm, level, and non-skid surface.
- All ladders meet OSHA specifications for design and safety.

**Loading Dock Areas**
- Dock blocks are up and in place when dock is not in immediate use.
- Only trained loaders and unloaders perform loading and unloading duties in that area.

**Platforms**
- Guardrails are in place and securely attached.
- Toeboards are in place and secure.
- All platforms meet OSHA specifications for design and safety.

WORK PROCEDURES
If any one of the conditions described in Pre-Work Check is not met for the area or piece of equipment posing a potential fall hazard, then employees may not perform that work until the condition is met. If the condition cannot be remedied immediately, a supervisor or any member of the Safety Committee must be notified of the problem. If the situation calls for use of fall protection devices such as harnesses or lanyards and belts because the fall hazard cannot be reduced to a safe level, then the employee must don such protective equipment before beginning the work and use it as intended throughout the duration of the work.

Only employees trained in such work are expected to perform it.

To prevent slipping, tripping, and falling, all passageways, storerooms, and service rooms must be kept clean and orderly and in a sanitary condition. The floor of every workroom will be maintained in a clean and, so far as possible, dry condition. Where wet processes are used, drainage will be maintained, platforms, mats, or other dry standing places are provided where practicable.

**TRAINING PROGRAM**

Under no circumstances will an employee work in areas of high fall hazards, do work requiring fall protection devices, or use fall protection devices until he/she has successfully completed this company's fall protection program. This includes all new employees, regardless of claimed previous experience.

The training program includes classroom instruction and operational training on each specific area of fall hazard involved in the work of the employee. the Safety Committee is responsible for conducting the training. Individuals in the following departments receive training: pipe department, plate department, quality control, maintenance, shipping / receiving. The department supervisor will identify all new employees in the Employee Orientation Program and make arrangements with department management to schedule the classroom instruction for those employees previously identified in this procedure.

Classroom training consists of:
· Review of these written procedures by employee.
· Successful completion of examination.

Operational training consists of:
· Pre-operational check.
· Operational review of use of lanyards and belts, accessing of areas with fall hazards.

**RECORD KEEPING**

The corporate Safety Representative maintains training records which include the following information:
· The date the training was provided,
· The specific area of fall hazard involved in the work of the employee, and
· A certification signed by the employee receiving the training.
These training records are kept in the Corporate HR Representative's office.

**DISCIPLINARY PROCEDURES**

Constant awareness of and respect for fall protection procedures and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety and Personnel Department reserve the right to issue disciplinary warnings to employees for failure to follow the guidelines of this program.
PROGRAM EVALUATION

Although we may not be able to eliminate all problems, we try to eliminate as many as possible to improve employee protection and encourage employee safe practices. Therefore, The Safety Committee is responsible for evaluating and updating this written plan. The evaluation will include a review of reported accidents, as well as near misses, to identify areas where additional safety measures need to be taken. The Safety Committee will also conduct a periodic review to determine the effectiveness of the program. This review may include:

· A walk-through of the facility, and
· Interviews with employees to determine whether they are familiar with the requirements of this program and if safety measures are being practiced.
TRANSPORTING AN INJURED WORKER TO THE DOCTOR OR EMERGENCY ROOM

1. IF THE INJURED PERSON IS AMBULATORY: the person will be driven to the doctor or emergency room by the department supervisor, the operations manager, or a designated co-worker. Under no circumstances will a person who has experienced a head injury, laceration, or possible broken bone drive himself to get treatment.

2. IF THE INJURED PERSON IS UNCONSCIOUS or requires immediate emergency care, then call 911 to get paramedics on the scene.
LOOSE CLOTHING

Loose clothing must not be worn while using any rotating equipment - including hand grinders or sanders. All shirt tails must be tucked in, long sleeves must be down and buttoned and loose jewelry must be removed.