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# FOX-1, Inc.



## **Safety Manual**

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*Revised 1/31/11*

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# **SAFETY MANUAL**

## **Fox-1 Drafting & Design, Inc.**

## **Fox-1 Resources, Inc.**

(Last revision date 1/31/11)

### **GENERAL POLICIES AND GUIDELINES**

#### **Injury and Illness Prevention Policy**

Fox-1 supports that employee safety and health is as important as quality. No job is so important that we cannot take the time to perform it safely. Our corporate goal is to beat the national average for lost workdays in our industry. To help meet this goal, we have written an injury and illness prevention program. The manager of this program is the human resources representative. To help us meet the safety goals, all employees should review the program and actively participate in the execution of the program.

#### **Safety Goals**

The safety and health of each employee is of primary importance. To assure this, our company maintains a safety and health program that matches the best practices in our industry. In order to be successful, the program must inspire the cooperation of each employee. There is no other way to have an outstanding safety record.

Our objective is a safety and health program that eliminates disabling injuries or deaths and reduces the number of illnesses and minor injuries to a minimum. We want to continue to attain the best experience compared to other similar companies. Our ultimate goal is zero accidents and injuries on the job.

Our safety and health program includes:

1. Basic safety information and educational materials applicable to each employee's job.
2. Safety training programs in conjunction with client companies for our on-site employees.
3. Safety and health rules and the requirement that employees follow these rules as a condition of employment.
4. Prompt and thorough investigation of every accident to determine the causes and identify a solution to correct the problem so that it will not reoccur.

We recognize that the responsibilities for safety and health are shared, and are difficult to monitor due to the nature of our business, so:

1. As your employer, we accept the responsibility for effective leadership of the safety and health program, for investigating injuries and reports of unsafe conditions, and for providing the information and support required to promote safe conditions.
2. As employees, we are all responsible for the proper attitude toward safety and health, for ensuring that all operations are performed with the utmost regard for safety and health, and for reporting any unsafe conditions to Fox-1 management.

Our main ongoing goal is to attain a safe working environment with regard to physical, chemical, material, fire, hygienic, auditory, and worker-induced hazards. Our annual goal is to have a record of zero injuries. Importantly, Fox-1's additional goal is to have a safety-conscious work force.

To this end, Fox-1 will provide regular information to employees in regard to policies and practices in safety and health. Also, the company will do investigations if a possible hazardous work condition is reported. All employees should enjoy a safe, injury-free environment. Fox-1 supports that employees inform management of all unsafe conditions as soon as possible. Management will resolve the problem in the best interest of everyone involved.

Fox-1 will train employees as needed on a periodic basis. Safety orientation will be provided to new hires. Distribution of safety-related information may occur via newsletters, mailings, or monthly meetings.

#### **General Safety Guidelines**

1. Do not take risks. Follow instructions on proper machine operation (if that is your job function). Use provided safety equipment, harnesses, or devices as dictated by your job function.
2. Promptly report in writing any unsafe acts or conditions to both your supervisor and the human resources representative. Your active support of safety is for the protection of you and co-workers.
3. Report all accidents (minor or major) immediately to both your supervisor and the human resources representative in order to help to correct any problems and for insurance purposes.
4. Consult your doctor before coming to work with a communicable, contagious disease or ailment.
5. Personal hygiene and cleanliness must be maintained as a prerequisite towards personal health and the health of others.
6. All drugs and alcohol are prohibited on Fox-1's work site, as well as client work sites. Do not come to work under the influence of drugs or alcohol. Failure to follow this rule may result in immediate termination.

7. Loose-fitting clothing, rings, bracelets, watches, high-heeled shoes, and gloves may contribute to injuries; don't wear them to work. Do not wear loose clothing, ties, or gloves near machines with moving parts. Do not wear rings, watches, or bracelets when near electrical devices or conductors.
8. Do not attempt to lift, push, or move objects that may be too heavy for you. Ask for help. Lift the correct way—bend your knees, keep your body erect, and push up with your legs. Wear lifting belts when appropriate. We furnish lifting support belts, if requested and necessary for your job.
9. If personal protective equipment is required for your job, wear it. Failure to wear personal protective gear may result in termination of your employment.
10. Employees should remain in their assigned department unless called away on business in the regular course of their duties.
11. If assigned to a customer location, Fox-1 employees must follow all safety guidelines of the client company.

### **Reporting Hazards**

Employee safety and well-being is extremely important to Fox-1. To ensure that potential hazards are eliminated, the following policy is effective:

Anyone who suspects that a hazard exists, or who notices any unsafe work practices, shall report it immediately in writing to their direct supervisor and the human resources representative at Fox-1, Inc. Evaluation of this report will be made as soon as possible. You will be notified of the action to eliminate any determined unsafe condition.

No employee of Fox-1 shall be penalized for following proper reporting procedures when observing a suspected hazardous condition, providing the intent of the notifying party was not frivolous or fraudulent. Every employee is considered a vital team member. Fox-1 supports the right of all employees to a safe, injury-free workplace.

### **Accident and Incident Investigation Policy / Safety Audits**

Employees are responsible for reporting all accidents, injuries, and near misses immediately, no matter how minor, to their supervisor and the human resources representative. Investigations will be initiated within 48 hours of the report time.

Once an accident or incident is reported to Fox-1, the human resources representative shall be responsible for gathering information as to the nature, type, and severity of the situation, and all causal factors. The human resources representative shall also be responsible for filing reports with the applicable agencies and with the workers compensation insurance carrier. The gathering and reporting of accident information will be done in a timely fashion.

When the accident investigation is complete, the human resources representative will give recommendations to prevent future similar accidents, injuries, or near misses.

Any documentation, resolutions, and corrective actions will be kept on file for five years in the Fox-1 corporate office.

Periodic safety inspections and audits will be performed regularly in required departments. These will be performed annually, bi-annually, or monthly as required. Trained and qualified Fox-1 managers will perform inspections. Documentation of findings will be kept in the Fox-1 corporate office. Deficiencies or needed corrections will be promptly addressed and documented.

### **Safety Violation and Disciplinary Policy**

The following acts, if they occur at Fox-1, Inc., or at a client location, shall be considered violations of the safety policy:

1. Not using personal protective or safety equipment when provided, or abuse, deliberate misuse, or destruction of selected PPE.
2. Refusal to follow verbal or written safety guidelines or instructions.
3. Engaging in activities, like horseplay, that jeopardizes the safety of others.
4. Engaging in activities that jeopardize the safety of self.

If an employee engages in any of the above actions, Fox-1 reserves the right to enforce the safety policy and take corrective action up to and including termination of employment. When implementing corrective procedures, a disciplinary system may be used. That system will include, but not be limited to, coaching meetings, warning letters, and suspension, as well as termination. A coaching meeting with an employee who violated safety policy shall be held to discuss the infraction, inform the individual of the rule or procedure that was violated, and note the corrective action to be taken. Follow up meetings with the violator may also be requested. The immediate supervisor will more closely supervise the disciplined employee following the coaching session to ensure improved ongoing safety rule adherence. Depending on the severity of the safety violation, immediate termination may ensue, instead of lesser disciplinary steps. Fox-1 will always take a common sense, business-driven, and fair stance regarding disciplinary measures.

Fox-1 managers responsible for enforcement of the disciplinary program include, but are not limited to, the human resources representative, staffing manager, company owners, on-site managers, and department managers. Company supervisors are responsible for Fox-1's commitment to its safety goals. Physical inspections by company officials that indicate violations showing overall lack of commitment to company safety goals shall be treated as cause for disciplinary action.

### **Work Related Injury and Reporting On-The-Job Injuries or Illnesses**

If you are injured on the job or develop a work-related health problem, immediately report the situation to the Fox-1 human resources representative or your direct supervisor. Even minor or insignificant injuries or health problems should be reported.

If the injury or health problem is severe enough to require treatment by a physician, you will be sent to a convenient and appropriate health care facility. If you prefer, you may see your own physician. While at the physician's office obtain a medical statement indicating whether or not you are able to return to work and, if you cannot return immediately, when you can safely return to work. If you are able to return to work, submit the medical statement to your Fox-1 supervisor or the human resources representative. On your timecard note the time you were off work obtaining medical attention. If you are not able to return to work immediately, you must present medical certification from your physician of your fitness for duty when you actively return to work. Failure to promptly and accurately report an on-the-job injury or work-related health problem may result in over or under payment of benefits and possible disciplinary action as deemed appropriate.

Fox-1 has a list of primary medical care providers who specialize in treatment of work-related injuries and illnesses. Contact the human resources representative for the name of a doctor in your area of the Twin Cities.

In case of an emergency, the injured employee should be transported to the nearest medical facility for treatment. Fox-1 should be notified of the work related injury or illness as soon as feasibly possible.

#### **Safety Committee and Meetings**

The purpose of the safety committee is to provide guidance and assistance in maintaining a safe operation. The goal of the committee is to fulfill safety and health obligations to all employees. This is accomplished by helping prevent personal injury and property damage. Reduction of medical costs is also a benefit of an effective safety program. It is the policy of the safety committee to maintain an up-to-date planned monthly program to maximize the safety of all employees by:

1. Establishing and enforcing safety policies.
2. Maintaining a safe working environment.
3. Educating and training employees in safe practices.

The function of the committee shall be to:

1. Implement programs for educating and training all employees in safe practices and safety procedures.
2. Establish a system of continuous appraisal of environment and job conditions to ensure safety.
3. Serve as a group to recommend policies to management to improve safety conditions.
4. Perform safety inspections as needed or required.

Company managers will determine the committee membership. Three people will be the minimum number of members.

A regular schedule of safety meetings will be maintained. Employees who are assigned to a customer site may be required to attend monthly mandatory safety meetings. An employee's direct supervisor will instruct if an employee should be attending periodic safety meetings. Failure to attend mandatory safety meetings, if directed by the supervisor, may result in disciplinary action.

### **Hazard Communication**

Fox-1 has established a written hazard communication program to ensure that employees with exposure or potential exposure to hazardous chemicals in their work area are provided with appropriate health and safety information. The written hazard communication program applies to all areas where employees are exposed to hazardous chemicals during their work or in a foreseeable emergency. The hazard communication program originates at the Fox-1 corporate office in Eagan. Further information such as a listing of hazardous chemicals present and MSDS may be obtained at the Fox-1 corporate office. A hazard communication program will be developed, implemented, and maintained at each applicable employee work site. For the purposes of this program the term "hazardous chemical" shall mean any chemical that is a physical or health hazard as defined in the standard, including mixtures and gases. Hazardous chemicals may be detected by monitoring devices, visual appearance, or odor. Physical and health hazards of chemicals in certain work areas will vary.

Consult the human resources representative regarding any possible hazardous chemicals in the immediate work area. Fox-1 maintains a list of hazardous chemicals on the job site. Employees in an area that is subject to contact with hazardous chemicals must wear appropriate PPE to prevent exposure.

In case of a possible exposure, the employee will be instructed in the proper emergency procedures, such as washing face and eyes in the eye wash station if splashed by certain chemicals. Fox-1 employees working in an office or customer service capacity are not typically subject to hazardous chemicals in the workplace.

Material safety data sheets, fact sheets on each particular hazardous chemical, and the written hazard communication program are readily available and accessible at the Fox-1 corporate office, the primary job site, from the human resources representative, at 4155 Old Sibley Memorial Highway, Eagan, MN 55122. Additionally, any hazardous chemical container will have a label that identifies it and provides general information about the physical properties of it and its health risks. Container labels should identify the chemical, give appropriate hazard warnings, and provide the name and address of the manufacturer or importer. Fox-1 employees must not remove or deface labels on incoming containers of hazardous chemicals because of the potential health risks of dealing with an unlabeled substance. Labels shall be legible in English. All current Fox-1 jobs require the ability to read, write, and understand English.

No Fox-1 employee may do a non-routine task that involves possible exposure to hazardous chemicals unless pre-approved by the Fox-1 human resources representative.



Non-routine tasks may pose special hazards to employees and Fox-1 is unwilling to risk any employee's safety on such tasks unless proper authorization is obtained and safety training is completed.

### **Material Safety Data Sheets**

There are three different places you can find information about hazardous materials in the workplace. They are the hazardous materials inventory reference chart, the container warning label, and the product material safety data sheets.

In certain job functions, employees may deal with chemicals particular to that industry. There is a material safety data sheet for each hazardous chemical. The sheet is available and usually supplied by the chemical manufacturer, supplier, vendor, or packager. The material data safety sheets (MSDS) contain information listed below.

1. The chemical and common names of all ingredients present in concentrations in excess of 1% and having known health hazards.
2. The health hazards and primary means of bodily entry of the hazardous material.
3. Precautions for safe handling and storage of the material.
4. Emergency first aid procedures in the event of exposure.
5. The name, address, and telephone number of the manufacturer or distributor, and the date of preparation.

The material data safety sheet was created and is required by law as a part of your right to know about on the job hazards. MSDS are accessible to all employees and may be reviewed at the Fox-1 corporate office in Eagan. To review them, contact the human resources representative. Fox-1 shall have access to MSDS for each chemical used.

### **Right to Know Program**

The purpose of this section is to inform employees that our company complies with the Minnesota OSHA Employee-Right-To-Know standard. This program applies to all work operations in the company where employees may be exposed to hazardous substances or harmful physical agents under normal working conditions or during an emergency situation. The human resources representative will review and update the program as necessary.

Under this program, you will be informed of the contents of the Employee Right-to-Know Standard, the hazardous properties of chemicals with which you may work, safe handling procedures, and measures to protect yourself from these chemicals.

### **Hazardous Material Labeling System**

Read the labels on bottles carefully to be sure you know what you are using. Using the wrong chemical could be disastrous. Do not use more or less than that amount specified.

Do not use, smell, touch, or taste any liquid or solid material that is in an unlabeled container. As a good practice, read each label twice before removing any of the contents from the container. All containers of hazardous chemicals must be labeled. Hazardous materials must be kept in the container with the original label. The following information should appear on the label:

- the identity of the hazardous chemical
- an appropriate hazard warning
- the name and address of the manufacturer or other responsible party

The NFPA (National Fire Protection Association) developed a system to label containers. This label is required on all containers holding hazardous chemicals. The label shows health hazard (blue), fire hazard (red), reactivity or instability hazards (yellow), and special hazards (white). Each label bears a code to show the level of hazard. The higher the number is, the greater the danger. The number 4 signifies the most extreme risk. The numbers 3 and 2 represent serious hazards. The number 1 stands for slight to minimal risk.

### **Training Plan**

Employees and management will be given training materials regarding the general goals, objectives, policies, strategies, and rules of safety.

Information could include, but not be limited to:

1. The location of fire exits and fire extinguishers.
2. The location of the first aid kit and eye wash station, if applicable.
3. The proper location for all materials, equipment, and safety gear.
4. Explanation of the security system and issuance of proper keys or security codes for entrance to the building.
5. Indication of how a machine, substance or material is to be used and the hazards involved.
6. Indication of location of requisite safety devices or aids and instruction on proper usage.

The human resources representative or recruiter will furnish a copy of the safety manual to each employee.

### **Contract and Temporary Employee Guidelines**

Fox-1 employees may be assigned to any Fox-1 customer location for work. Work environments will vary based on the assignment. Some assignments will be in an office environment. However, some assignments will be in a field, plant, or refinery environment. It is crucial that any Fox-1 employee whose job duties include working in an industrial area follows all the safety guidelines of the client company.

If the Fox-1 employee will be working in a hard hat required area, the hard hat must be worn at all times. In the same vein, if steel toed work boots or eye protection is required by the client, the Fox-1 contract employee must observe the rules and wear the appropriate gear. Failure to follow prescribed safety guidelines of the customer will result in disciplinary action up to and including termination.

Contract or temporary employees who are unsure of the customer's guidelines should seek assistance from the human resources representative, who can arrange for specific training that may be needed.

Fox-1 employees should never knowingly put themselves in harms way by climbing on any obstacle in the field. Only if a safety harness and other safety equipment are used, the employee may proceed with the task that requires climbing if it is a legitimate duty of the job.

Fox-1 employees who are asked by a customer to do a job that involves handling or mixing chemicals should first contact the human resources representative to confirm those duties are allowable. Additional safety training may be required before handling potentially hazardous chemicals.

Employees should think before taking any action that may be dangerous. Even if a customer asks the employee to do a certain possibly dangerous duty. If there is a question as to safety, phone the human resources representative first, before performing the duty. Fox-1 will step in and mediate with the customer if needed. The bottom line is that common sense should be used. Don't take risks! Your life is too precious.

#### **Contract or Temporary Employees – Emergency Response Procedures**

When a Fox-1 employee begins a position at a client company, it is important that the employee learn about their surroundings. All client companies should have a map posted that charts the nearest emergency exits. On the first day of an assignment, the Fox-1 employee should receive a tour of the office and work environment. Special attention must be paid as to the location of emergency exits in relation to where the employee will be sitting. If the need for emergency evacuation might arise, the employee will then know where to proceed immediately.

In the situation that a Fox-1 employee is injured on the job while at a customer site, the employee must contact the human resources representative as soon as possible to report the injury or work-related illness. Fox-1 management will handle the situation by coming to the job site or instructing the injured employee of the proper next steps to take.

#### **Security and Drug/Alcohol Testing Requirements**

All Fox-1 employees who are assigned to customer locations with security requirements must be prepared to complete steps to obtain security authorization to enter the customer location.

Specifically, employees assigned to refineries or plant settings will be required to undergo safety and procedural training, drug tests, and background checks. Upon successful completion of those steps, the employee will be issued a badge. The badge must be worn in clear view at all times when in the refinery or plant and will serve as identification for access through contractor gates. Fox-1 contract employees working on site at some locations, such as refineries or plants, may be subject to random periodic drug/alcohol testing as a condition of continued employment. See the human resources representative if any questions about this program.

### **Weapons**

Weapons shall not be permitted on Fox-1 or customer property. Violators will be escorted from the location and banned from future work for Fox-1 or any Fox-1 customer. Law enforcement assistance may be requested, depending on the situation. The human resources representative must be apprised of any workplace incidents involving weapons.

### **Blood Borne Pathogens**

The OSHA Blood Borne Pathogens standard is designed to protect the nation's workers, particularly health care workers, from exposure to the Hepatitis B Virus (HBV), the Human Immunodeficiency Virus (HIV), and other blood borne pathogens. This policy does not apply to Good Samaritan acts such as helping a fellow worker with a nosebleed or cut finger. Acts such as these are not considered official duties or exposures covered under this plan.

All employees who are subject to occupational exposure with blood or other potentially infectious materials such as body fluids, saliva, cell or tissue cultures, and the like, must follow the Fox-1 Blood Borne Pathogens policy. All affected employees must take standard precautions when handling the above mentioned potentially infectious materials. This means that all human blood and human body fluids are treated as if infectious. In circumstances in which differential between bodily fluids is difficult or impossible, all body fluids will be considered potentially infectious; this is the universal procedure. Standard precautions include, but are not limited to, wearing personal protective equipment, hand washing, and awareness of immediate environment. Fox-1 will also make available the hepatitis B vaccine gratis to all employees who have occupational exposure.

Fox-1 will ensure that all employees with occupational exposure participate in a training program. Training shall be mandatory for all employees who can reasonably anticipate exposure to infectious materials, such as blood or bodily fluids, in the course of their duties. Affected employees shall be trained in emergency and work practice controls at the time of initial assignment, and annually thereafter. Training will occur within one year of their previous training. They, additionally, will be trained to recognize different labels and signs that serve as warnings of infectious materials. If Fox-1 should have employees with occupational exposure, the human resources representative shall be responsible for preparing an exposure determination.

The exposure determination shall be made without regards to the use of personal protective equipment. Employees shall have full access to the exposure determination and exposure control plan and be given an individual copy.

Fox-1 does not currently employ persons in specific job classifications that carry risks of occupational exposure. The types of jobs that have such risk include doctors, nurses, lab technicians, janitors, and emergency responders, to name a few. These are people who are trained in first aid and expected to provide emergency care or handle bodily fluids.

Emergency and work practice controls shall be followed to eliminate or minimize employee exposure. If an affected employee experiences an exposure incident, which is defined as skin, eye, mucous membrane, or parenteral (piercing of mucous membranes or skin through such events as needle sticks, human bites, cuts, and abrasions) contact with blood or other potentially infectious materials, in the performance of the employee's duties, the Fox-1 manager or human resources representative must be contacted immediately after the exposed skin surface has been washed or flushed thoroughly with soap and water. If hand-washing facilities are not readily available or feasible, Fox-1 shall provide appropriate supplies such as antiseptic hand cleanser, paper towels, and antiseptic towelettes. Specimens of blood, used bandages, or other potentially infectious materials must be put in leak proof bags for handling and transport.

When the possibility of occupational exposure is present, PPE will be furnished to affected employees at no cost. PPE shall be used unless Fox-1 shows that the employee temporarily declined to use PPE under rare circumstances. PPE shall be supplied in appropriate sizes for all employees and will be readily accessible. PPE will be clean, laundered, and properly disposed after use. Fox-1 shall repair and replace PPE as needed to maintain its effectiveness. All contaminated surfaces or equipment shall be cleaned and decontaminated after contact with blood, bodily fluids, or infectious materials.

Exposed employees will be referred for immediate medical attention and follow-up exposure examination, testing, and counseling. The manager or human resources representative will conduct an investigation, and will make recommendations as to how to avoid future similar events. Program effectiveness will be examined, maintained, and changed, if needed, on a regular schedule to ensure a safe work environment for affected employees. Additionally, Fox-1 shall establish and maintain an accurate record for each employee with occupational exposure in accordance with governmental regulations. Training records shall include the date and content of training, name and job title of persons in attendance. Training records shall be maintained for three years. Also, Fox-1 shall ensure that all records are accessible to employees upon request and may be examined and copied. Medical records shall only be released pending a written consent from the particular employee. Medical records are kept on file for the duration of 30 years, plus entire employment length. Transfer of records is also subject to prior written approval. Fox-1 shall have a manager in charge of medical records, should we employ employees in these job categories in the future.

## **Hand and Power Tool Safety**

Hand and power tools improve employee efficiency and overall job performance when used properly. Fox-1's safety objective is that tools are used in accordance with safety guidelines to protect users from inflicting harm to themselves and others. This policy includes information on training, guidelines for use of hand and portable power tools, and general requirements for all tools.

It is the policy of Fox-1 to provide a safe workplace. Therefore, hand and portable power tools will not be used until employees receive instruction and training in the proper use of these tools. Training shall be completed prior to job site assignment. Authorized Fox-1 managers shall only give training. The employee receiving training shall sign and document a training form after the training session. At this time, Fox-1 does not employ workers who regularly utilize hand or power tools as part of daily duties.

Fox-1 shall categorize tools as follows. Hand tools are tools that are manually operated and powered by human force such as screw drivers, pliers, wrenches, cutting shears, and the like. Pneumatic tools are tools powered by air such as air wrenches, air grinders, spray guns, and air fasteners. Power tools are manually operated and powered by electricity, air, gasoline, diesel, or explosives.

All hand and portable power tools supplied by Fox-1 or used by Fox-1 employees will be maintained in safe working order. All tools shall be inspected before use. Tools or handles that are cracked, broken, loose, or in poor condition shall be removed from service. Impact tools such as wedges, pins, and chisels shall be kept free of mushroomed heads. Avoid using dull tools, which are hazardous to use because excessive force must be used to make them cut. Portable power tools shall be inspected before use. Tools with missing or broken guards, nicked or frayed electrical cords, broken plugs or switches, damaged equipment housing, or broken tool retainer shall not be used and shall be tagged and removed from service. Tools safety guards will always be used. Employees shall wear all required PPE when using tools. Employees will be provided with specific PPE if they are exposed to hazards such as falling, splashing, abrasive, or flying debris or exposed to harmful fumes, dust, vapor, or gases.

General hand and power tools guidelines include:

- Only safety trained and certified employees may use hand or power tools on the job.
- Tools must be used properly. Even a screwdriver used improperly can result in grievous injury. Always select the correct type and size of tool for your work and be sure it is properly adjusted and sharp.
- Handle and carry tools with care. Keep edged or pointed tools turned downward. Never carry or lower a power tool by its cord. Do not carry sharp tools in your pockets.
- Clean and inspect tools daily. Oil or dirt on a tool may cause it to slip and cause an injury.

- Check tools for defective switches, cords, plugs, and proper grounding before each use.
- Defective tools should not be used and should be reported immediately to a Fox-1 manager and labeled or brought to the appropriate person for immediate repair. Fox-1 employees are prohibited from using any defective tools. Doing so will result in disciplinary action up to and including termination.
- Personnel must wear PPE including protective eye covering and earplugs any time they are operating tools. Fox-1 will provide all necessary PPE to employees. See your Fox-1 supervisor to obtain your PPE.
- Rotating or moving parts of equipment are guarded to prevent physical contact with the operator. Guards must be used at all times.
- All cord connected, electrically operated tools and equipment must be effectively grounded.
- Only portable fans with full guards or screens with ½ inch or less openings may be used.

### **Ladder Safety**

Fox-1 requires all authorized personnel to use ladders safely on the job. Although Fox-1 does not typically employ persons who use ladders regularly as part of daily duties, the following guidelines must be followed if an employee has a need to utilize a ladder on the job. First, before doing any duty that involves using a ladder, you must have express approval from your immediate supervisor.

Inspect a ladder before each use and if it is in poor condition or unsafe, do not use it. Defective ladders must be tagged and placed out of service immediately by the inspecting employee. Examine it for loose rungs, wear and tear, and any visible defect. Choose a ladder that will reach the work. An extension ladder should reach three feet above the work level. If a ladder is not able to extend three feet above the work level, it must be secured at its top to a rigid support that will not deflect. Move the ladder with your work. If both shoulders are extended outside the ladder while working, you are reaching too far. When using an extension ladder, employ the 4 to 1 rule: For every four feet of height, move the bottom of the ladder one foot away from the wall. A ladder is pitched at the proper and safe angle if you can grasp a rung at shoulder height.

Place the ladder on solid and stable footing. Rungs, cleats, and steps should be parallel, level, and uniformly spaced for proper use. If the ladder is in danger of moving while you work, tie it down. If there is a danger the ladder will be hit, barricade around it.

Never use an aluminum ladder in the vicinity of electrical lines and never use a ladder outdoors during inclement weather or very windy days.

Carry tools and materials in proper carrying devices and keep your hands free for climbing. While working, secure all tools to prevent them from falling off the ladder. When climbing, always face the ladder. Never stand on the top two ladder rungs or the top of a stepladder.

Only use a ladder for the intended purpose. Additionally, use the correct load capacity for the task. Do not overload the ladder beyond the manufacturer's rated capacity.

### **Electrical Safety Policy (Non-Qualified)**

Fox-1's policy is to carry out all electrical work in a safe manner consistent with OSHA standards. Any employee who may be exposed to energized parts is considered to face a higher than normal risk of contact, whether they are an electrical worker or not, and is expected to follow, be trained in, and familiar with all electrical safety guidelines and practices.

Electrical circuitry and conductors shall be regarded as energized until the power source has been removed, tested, grounded and locked-out. Only authorized employees shall install, maintain, repair, and troubleshoot electrical apparatus, equipment, and circuitry. Authorized employees will be trained regarding special precautionary techniques, PPE, insulating and shielding materials, and insulated tools.

General electrical safety rules are as follows:

- All employees are asked to observe the "rule of ten". Keep all objects at least ten feet away from overhead power lines. Overhead lines must be deenergized and grounded or other protective measures shall be provided before any work is started on them.
- Safe work practices must be followed to prevent electric shock or other injuries resulting from direct or indirect electrical contacts when work is performed near or on equipment, live parts, or circuits that are or may be energized. Workers shall exercise extreme caution when working near exposed energized parts, using tools near them or are near enough to them to expose the employee to any electrical hazard they present. Additionally, workers shall exercise caution even when working near exposed deenergized parts or near enough to them to expose the employee to any electrical hazard they present.
- Electric panels shall not be left uncovered or unprotected at any time.
- Power equipment with power switches will be in the off position when plugged into wall receptacles.
- Electrical equipment will be unplugged by grasping and pulling the plug. Cords shall not be pulled or jerked to unplug the equipment.
- Frayed, cracked, or exposed wiring on equipment cords must be corrected through appropriate repair or replacement.
- "Cheater plugs" (3 way to 2 way adapters), extension cords with electrical junction box receptacle ends, or other site-rigged equipment shall not be used.
- Temporary or permanent storage of materials must not be allowed within three feet of any electrical panel or electrical equipment.
- Any electrical equipment causing electrical shock must be tagged, using a lockout or tagout procedure, with a "DANGER-DO NOT USE" label or equivalent.



- Lockout and tagout procedures are used also when an employee is encountering any hazard from a source of energy such as steam, hydraulic, gravity, and the like.
- When electrical hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, Personal Protective Equipment (PPE), and proper training regarding electrical related safe work practices will be implemented. These measures will be implemented to ensure the safety of employees and the public and to minimize those hazards.
- Electrical work performed by authorized employees must be performed in an illuminated work area. Employees may not enter spaces containing exposed energized parts unless lighting is on.
- Unqualified employees must stay a minimum of ten feet away from electrical hazards and walk carefully around them. Employees who have a job function that involves operating vehicles or mechanical equipment that may be driven by or located by an electrical hazard will receive training regarding those hazards and the safe distances to avoid them.
- Authorized employees who work in confined or enclosed work spaces near electrical hazards will receive special training and PPE, such as protective shields, barriers, or insulating materials to avoid those hazards.
- No Fox-1 employee is authorized to handle long, dimensional conductor objects such as ducts or pipes as that is not a current job function of any Fox-1 employee and the electrical hazards of carrying such objects are present.
- Authorized employees shall use only portable ladders with non-conductive side rails.
- Conductive apparel or jewelry shall not be worn to the job site unless they are rendered non-conductive by covering, wrapping, or other insulating means.

It is the responsibility of each manager, supervisor, and employee to ensure implementation of Fox-1's safety policy on electrical related safe work practices. It is also the responsibility of each Fox-1 employee to immediately report any unsafe act or condition to his or her supervisor.

### **Fall Protection**

The purpose of Fox-1's fall protection policy is to protect employees from the risks of injuries due to falls when working at elevated heights. Fox-1 will train each employee who might be exposed to fall hazards. Training will equip the employee to recognize the hazards of falling and the procedures to follow to minimize these hazards. Fox-1 will keep a written confirmation of training that notes which employee was trained, the trainer's name and signature, the date of adequate training, and the signature of the person who was trained. Fox-1 will provide re-training in certain situations. These situations include, but are not limited to, deficiencies in training, work place changes, or fall protection or equipment changes that render previous training obsolete.

The human resources representative, the company's safety coordinator, has prepared the Fox-1 fall protection plan for employees assigned to Flint Hills Resources, Koch Pipelines, or other work sites involving possible plant exposure. The immediate supervisor of the work site shall be responsible for recognizing fall hazards, warning employees of potential fall hazards, and advising employees against acting in an unsafe manner. The supervisor shall be on the same working surface as team members and in visual sight; should stay close enough for verbal communication. Also, the supervisor should remain focused on supervising employees and not pursue other tasks that take him or her away from the monitoring function during daily duties.

Their immediate supervisor shall monitor employees assigned to a work function in which they are exposed to fall hazards. The supervisor should stay close enough for verbal communication and must pay attention and monitor the actions of workers who are potentially exposed to falls.

Fall protection systems are designed to protect personnel from the risk of falls. These systems include portable or extension ladders, aerial lifts, self powered platforms, safety nets, suspended and supported scaffolds, guard rails, or fall arrest equipment. Employees who are potentially exposed to falls from heights of six feet or greater to lower levels shall wear fall protection. This includes work near or around excavations. Employees working more than six feet above a solid surface or level shall wear OSHA approved safety belts and lifelines when scaffolds with guardrails or sloping ladders are not provided. Equipment will also meet ANSI, OSHA, and ASTM requirements. Employees working on scaffolding over 20 feet in height shall wear an OSHA approved safety life belt and lanyard. The lanyard shall be attached to a lifeline. The lifeline should be attached to the solid structure or building and not to the scaffolding. Safety life belts and lanyards shall be inspected before each use. Safety life belts, lifelines, and lanyards shall only be used for employee safeguarding. Lifelines shall be attached to the structure or building above the point where the employee is working and shall be capable of supporting 5400 pounds of dead weight. Authorized employees entering permit-required spaces such as tanks shall wear a full harness type of safety life belt and be attached to a lifeline. If a standard method of fall protection is not feasible in a certain area, a Fox-1 employee should not risk falling and should not attempt to work in that area. Instead, the employee should approach their Fox-1 manager for an alternative course of action. If conventional fall protection methods are not feasible in a certain area, that area shall be deemed a controlled access zone and should not be entered by a Fox-1 employee. Controlled access areas should have a safety monitoring system in place to prevent unauthorized employees from entering.

In case of an accidental fall at work, the immediate supervisor shall rapidly arrange for prompt rescue of the involved employee. All falls or near falls will be investigated. Changes to the fall protection plan may be made depending on occurrence of accidents and outcomes of investigations.

## **First Aid, CPR, and Medical Services**

If a Fox-1 employee accepts a position in a job classification that responds to medical emergencies or may be called upon to render aid, that employee shall be CPR/First Aid certified. At this time, Fox-1 does not have any employees who serve as a medical first responder. Fox-1 asks employees to serve as a Good Samaritan if a happenstance medical emergency arises; the employee should call immediately for a certified first responder or emergency crew. Only a person who has a valid certificate in first aid training from the American Red Cross, or equivalent, may be a designated first responder at work sites where emergency first aid is provided.

In anticipation of possible injuries or illnesses, the human resources representative shall post in conspicuous places telephone numbers such as 911 and phone numbers of nearby hospitals or clinics. All Fox-1 employees work in close proximity to a telephone with which to contact emergency personnel.

If injured or ill on the job, the Fox-1 employee must contact the Fox-1 Director or HR representative as soon as possible to report the illness or injury.

In the case of a serious life threatening medical emergency or injury at work, medical care, such as an ambulance, shall be summoned by telephone or cell phone as urgently as possible and the injured party shall be promptly transported to the nearest hospital.

If the injury or illness requires urgent care but is not life threatening, a Fox-1 manager shall come to the injured employee's work site to oversee care or bring the injured party in to the medical center or physician's office.

The Fox-1 managers shall gather all the factual information to the incident and file a first report of injury with the insurance carrier. First aid supplies shall be available at all work sites. The human resources representative or immediate supervisor will be able to direct injured parties to the easily accessible first aid station. Weather proof first aid kits shall consist of appropriate individually sealed items for treating wounds and injuries: sterile bandages, gauze, first aid tape, ointment, and the like. First aid items shall be sealed individually and shall meet the standards of ANSI Standard Z308.1-1998.

On site Fox-1 employees shall have ready access to a first aid kit at their job site. The immediate on-site supervisor shall ensure assigned employees have knowledge of the location of the kit, will check the kit weekly, and replenish used items.

Employees in job functions that are exposed to possible splashing of injurious materials or chemicals onto the body or face will be shown the exact location of the wash station. In the case of exposure to injurious corrosive materials, the employee should immediately proceed to the wash station and drench or flush the exposed body part with water for an extended period of time. After that, the employee should seek immediate medical attention and phone the Fox-1 human resources representative for completion of first report of injury paperwork.

## **Lockout and Tagout**

Locking and tagging out equipment safeguards those working on the equipment from being injured by its being unexpectedly energized or releasing stored energy. This policy applies to employees whose job requires operation or use of a piece of equipment on which maintenance or service is being performed; or whose job requires working in the area of the equipment; or any person in close proximity to the equipment.

This policy does not apply to minor tool changes such as changing a drill bit on a drill press or work on electrical equipment that is connected by a cord and plug where the hazard of the equipment being accidentally turned on or releasing stored energy is eliminated by unplugging the equipment, as long as the person working on the equipment has exclusive control over the plug.

Potentially hazardous energies covered by this policy include electrical, mechanical, hydraulic, pneumatic, chemical, tension, gravity, and thermal or steam energies. This policy applies to all work at Fox-1's corporate office or client sites that involves the installation, service, maintenance, adjustment, or other handling of machines, powered equipment, or utility systems where the unexpected energizing of the equipment or a release of stored energy could cause injury or death. Examples of activities covered by these procedures include, but are not limited to, unjamming a printing press, adjusting internal electronics of a piece of equipment, repairing high voltage electrical service equipment, or changing the fan motor on an air handling unit. Although at this time Fox-1 does not employ any personnel in covered functions, covered functions may include technicians, machine operators, electricians, or mechanics.

All personnel who fulfill covered functions discussed above must follow the lockout procedure. The person conducting the lockout or tagout procedure must be prepared for the shutdown by possessing knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the methods to control the energy. If an energy source can be locked out, this method shall be utilized. A lockout device utilizes a lock, either key or combination to hold an energy isolating device in a safe position. First, all affected persons must be notified that the equipment will be off and locked out. Next, all energy sources for the equipment should be identified. Then, the equipment shall be shut off or otherwise de-energized in an orderly fashion, being careful to de-energize all energy sources. This includes all valves, switches, breakers, or other controls that supply energy to the equipment. In the case of mechanical energy, a block may be used to stop the release of stored energy. For the next step, a lock is to be placed on each energy source disconnect or energy release block. The lock is to be placed directly on the equipment if provided with an integral lockout device and affixed in a manner that holds the energy-isolating device in an off or safe position. If there is no integral lockout device on the equipment, securely attach an independently manufactured lockout device on the equipment and then place the lock on the lockout device. The locking device shall be marked with the name of the person applying the device. If lockout is not possible, use a tagout procedure.

A tagout device is a weather-resistant warning tag standardized in size, color, with wording warning of hazardous energy. It usually warns to not energize, operate, or start the equipment. A tag is to be secured to each energy source disconnect or energy release block and shall be located as close as safely possible to the device in a position that will immediately be obvious to anyone attempting to operate the machine. The tag must indicate that the equipment is not to be energized and shall indicate the identity of the person applying the device.

Following the application of the lockout or tagout device to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained, or otherwise rendered safe. If there is a possibility of reaccumulation of stored energy level, verification of isolation shall be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists. Prior to starting work on equipment or machines that have been locked or tagged out, the appointed employee shall verify that isolation and deenergization of the machine or equipment has been accomplished. Now the equipment is ready to be safely serviced. After service, the worker who placed it must remove the lockout/tagout equipment. Before the removal of a lockout/tagout, the worker must check to see all workers and bystanders are in a safe position and that non-essential loose items are removed from the equipment.

To temporarily and safely test a machine that is being repaired or maintained the lockout or tagout device will be temporarily removed by using the following steps. First, clear away tools from machine and immediate area; remove employees from area, remove the LOTO device; energize and proceed with testing; de-energize and reapply control measures. The authorized employee must document this procedure.

When more than one person works on the same equipment, multiple lockout devices must be used. Each qualified worker must put his or her lock on the multiple lockout device and remove it when he or she stops working on the equipment. Only when all locks are removed can the equipment be re-energized. Lockout or tagout procedures may vary by department or job function. In all cases, the procedure will assure each group of employees a level of protection equal to that provided by a personal lockout or tagout device. The authorized Fox-1 manager shall ascertain the exposure status of individual group members. Each employee must attach a personal lockout or tagout device to the group's device while she or he is working and then removes it when the task is completed. During shift or personnel changes, the lockout and tagout procedure is the same and shall remain in place and continuous for all group members no matter what shift is worked.

Any questions about the lockout/tagout procedure should be directed to an employee's immediate supervisor. Failure to follow the lockout/tagout procedure in covered situations is cause for immediate termination of employment.

Fox-1 employees authorized to work with hazardous energy sources shall be trained and retrained periodically regarding the energy source, type, and magnitude of energy

available, and regarding the methods and means necessary for energy isolation and control. Training will include the purpose and use of the energy control procedure. Topics covered will address appropriate lockout and tagout situations, limitations of tagout systems, and specific tags or locks to use. Employees will be instructed that a tag is not to be removed without authorization and not to be ignored. Retraining will be required when there is a change in job assignment, in machines, a change in energy control procedures, or when a new hazard is introduced to the work site. Employees receiving training will sign and date an acknowledgement that training has been completed and understood fully. An annual inspection shall be conducted by a company manager to ensure that lockout and tagout procedures are being employed properly. A certified review of the inspection including date, equipment, employees, and the inspector shall be documented in writing and kept by the human resources representative.

### **Personal Protective Equipment (PPE)**

Personal protective equipment includes all clothing and other work accessories designed to create a barrier against workplace hazards. It prevents inhalation, absorption, or physical contact of body parts with hazards of industrial processes or environments. Examples of types of personal protective or safety equipment include sterile surgical gloves, ear plugs, fire retardant clothing (Nomex or equivalent), work boots, hard hats, respirators, breathing air, gloves, and safety glasses or goggles. Fox-1's safety program supports that PPE provided to employees will be in reliable condition and sanitary. Selection and wearing of personal protective equipment shall be deemed necessary only for employees who occupy a position that includes occupational exposure to workplace hazards. Employees required to wear personal protective equipment include, but are not limited to, construction or plant personnel, healthcare workers, or lab technicians.

Some employees who occupy an administrative or clerical position, but occasionally are expected to go into the plant for some duties, must wear personal protective equipment when in the plant setting. To inquire further about your obligation to wear personal protective equipment in the course of your duties, see your immediate supervisor or contact the Fox-1 human resources representative to confirm.

Employees required to wear PPE shall be trained on what PPE is necessary and how to properly gear up and wear it. Other considerations the employee shall learn are the proper care, maintenance, useful life, and disposal of PPE. As PPE or job function changes, retraining may be necessary. When an employee is certified to use PPE, the trainer will document the employee name, date of training and the certification subject. Only certified employees will use PPE. If an employee demonstrates misuse or incorrect use of PPE, retraining and re-certification will be required to continue in the job. It is the right of every employee to have PPE that is well maintained and sanitary so that body parts are protected from physical contact, absorption, or inhalation. Defective or damaged PPE should not be used and should be reported to the immediate supervisor promptly. Disregard of this policy and use of compromised, defective, or damaged PPE shall be grounds for disciplinary action up to and including termination.

In the case of employee-owned PPE, Fox-1 will only allow well-maintained, reliable, and sanitary equipment to be used on the job. Consult your immediate manager to discuss which employee-owned PPE is allowable or necessary; or see the human resources representative to discuss further. The immediate Fox-1 supervisor shall inspect employee-owned PPE to ensure adequacy, maintenance, and sanitation.

When an employee starts a particular job, the immediate supervisor shall conduct hazard assessments to determine if certain hazards are present or are likely to be present, which necessitate the use of PPE. The supervisor shall document the hazard assessment. The hazard assessment must include the supervisor's name, signature, date, and specific hazards identified. If hazards or potential hazards are identified, the supervisor must select PPE for each affected employee. Additionally, the supervisor should fit each employee with the necessary PPE and train on the proper way to wear, clean, and maintain the PPE.

An employee whose essential duties include entering a restricted area where a respirator must be worn should be fit-tested, trained, and medically cleared prior to performing those duties. The respirator must be annually fit-tested by a qualified individual, who must certify in writing the successful inspection.

Authorized employees required to enter designated hard hat areas must wear a hard hat. Hard hats are worn in plant areas of a refinery or other construction zones where there is a possibility of a head injury while performing a job. Entering a hard hat area without wearing hard hat is grounds for immediate termination.

### **Process Safety Management Program to Address Petroleum Refinery Hazards**

Modern petroleum refineries utilize a vast array of chemical processes to convert raw material and crude oil into a variety of products. These products include fuels, petrochemical feedstocks, solvents, process oils, lubricants, and specialty products such as wax, asphalt, and coke. Throughout the refining process, workers can be potentially exposed to various health and safety hazards including chemical agents and physical agents. Chemical agents used in refining include hydrogen sulfide, acids, hydrocarbons, carbon monoxide, polynuclear aromatic hydrocarbons, and nickel carbonyl. Physical agents that potentially pose a threat are heat, height, and noise.

Because of the special hazards present in a refinery setting, contract employees assigned to a refinery or plant will be asked to participate in a special Fox-1 safety training program. The program includes monthly safety meetings, safety awareness cards to document, and specific training geared to the refinery safety goals. The responsible company manager shall document training times and dates. The employee shall sign an acknowledgment form that they received training and understood the content. The hiring manager shall discuss any unique hazards present in an employee's job function in an up-front manner. Also, facts about particular chemicals may be accessed

in the material safety data sheets available for review. Contact the human resources representative for more information.

Fox-1 contract employees assigned to refinery positions will participate in process safety management and will be trained in the work practices necessary to perform the assigned job safely. Specific training will include known potential fire, explosion, or toxic release hazards. The goal of training is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. Also, training will cover an emergency action plan. The ongoing safety and welfare of employees is dependent on their continual use of safe operating procedures and good engineering practices. Fox-1 shall document that each employee has received and understood the required training. The employee who receives training will sign and date an acknowledgement that training was completed. This will serve as verification that the employee understood the training.

All employees must embrace the program for us to meet our goal of zero accidents and injuries yearly. The human resources manager or hiring manager will inform new employees of the safety program during orientation.

Employees working in a plant environment will be informed regarding safe work practices and potential process hazards present in the work area. Operating procedures with clear instructions for safely conducting operations and maintenance will be readily accessible to employees. Safe work practices such as lockout/tagout, confined space entry, opening process equipment or piping, wearing body harnesses, and control over entrance into a facility shall be discussed and followed by Fox-1 employees. If a Fox-1 employee will be performing hot work, hot work may not be performed until the applicable permits are obtained by Fox-1. The permit shall document that the provisions of CFR 1910.252 have been met.

Keep in mind that certain process safety information may be confidential or a trade secret of the client company. Trade secrets are addressed in the confidentiality form signed by all new employees. Confidential client information may not be shared with any outside party at any time.

Any incident, accident, injury, or near miss that results in or could reasonably have resulted in a catastrophic release of highly hazardous chemical in the workplace shall be investigated promptly, no later than 48 hours following the incident. The incident investigation team shall consist of at least one person knowledgeable in the process involved. Incident reports shall be prepared at the conclusion of an investigation. Corrective action shall be noted on the report. Documentation of the incident and subsequent investigation shall be retained for at least five years.



## **Hydrogen Sulfide (H<sub>2</sub>S)**

Fox-1's hydrogen sulfide (H<sub>2</sub>S) awareness program applies to all employees who are possibly exposed to hydrogen sulfide during their work or in a foreseeable emergency. The hydrogen sulfide awareness program originates at the Fox-1 corporate office in Eagan.

This program specifically is targeted toward Fox-1 employees who may be exposed to H<sub>2</sub>S during the course of normal job duties at our customers' refining or heavy industrial operations. H<sub>2</sub>S may be found in water from sour crude wells, tanks at pipeline or refining operations. It may exist during blowouts, during field maintenance, in tank batteries, or in drilling operations.

A colorless, flammable, extremely hazardous gas, H<sub>2</sub>S, occurs naturally in crude petroleum and natural gas. It is soluble in water. As it is heavier than air, it can collect in low-lying or enclosed and poorly ventilated areas such as basements, manholes, sewer lines, and underground vaults. At low concentrations, the smell of it can be described as "rotten eggs" and it irritates the eyes, nose, throat, or respiratory system.

At high concentrations, ability to smell the gas can be lost immediately. Exposure at moderate concentrations causes more severe eye and respiratory effects, headache, dizziness, nausea, coughing, vomiting, and difficulty breathing. If exposed to high concentrations, the person may rapidly, within a couple breaths, go into shock, convulse, be unable to breathe, go into a coma, or die. H<sub>2</sub>S exposure adversely affects the nerve centers of the brain that control breathing.

Sense of smell is not dependable in determining the presence of H<sub>2</sub>S in a particular area. Before entering an area with possible hydrogen sulfide, the air needs to be tested for the presence and concentration of H<sub>2</sub>S by a qualified person using test equipment. Personal or area monitors should be set to alarm when PEL exceeds the preset level of 20 PPM for 1910 or 10 PPM for 1926. If the alarm sounds and gas is present, the employee should vacate the area immediately. The area should be well ventilated to remove the H<sub>2</sub>S. If the gas cannot be removed, qualified employees should use respiratory protection and any other necessary PPE, rescue, and communication equipment to access the area. A self-contained breathing apparatus (SCBA) is required in areas with high concentration of H<sub>2</sub>S (greater than 100 PPM).

In case of a possible exposure, the employee must contact their immediate supervisor immediately to report the incident. Additionally, the Fox-1 human resources representative must be contacted to report and document the incident and to discuss prevention of future exposure incidents. The hydrogen sulfide awareness program is readily available and accessible at the Fox-1 corporate office, the primary job site, from

the human resources representative. The primary job site is at 4155 Old Sibley Memorial Highway, Eagan, MN 55122, and can be contacted via main phone number of 651-894-3990. Additionally, Fox-1 employees working on site at a refinery or plant will be trained on that location's specific contingency or emergency plans and must be aware of such plans.

### **Hearing Conservation Policy**

Fox-1 is highly concerned about protecting employees from exposure to high levels of occupational noise. Noise, unwanted sound, is a pervasive occupational health problem and is the by-product of many industrial processes. Exposure to high levels of noise can cause hearing loss, as well as other harmful health effects.

Noise-induced hearing loss can be temporary or permanent. Generally, prolonged exposure to high noise levels over a period of time gradually causes permanent damage. Fox-1's hearing conservation program is designed to protect workers subjected to significant occupational noise exposures from hearing impairment.

Fox-1 employees exposed to noise at or above 85 decibels averaged over eight working hours daily or an eight hours time-weighted average must wear hearing protection. Hearing protection is provided at no cost by Fox-1 and can be obtained via your immediate supervisor. Additionally, hearing protection shall be replaced gratis or refitted as necessary. Fox-1 managers will ensure that affected employees are provided and wear appropriate hearing protection. Employees shall be properly trained in the use, care and fitting of protectors.

Employees who are concerned about the ongoing noise levels in their department may request noise monitoring of that area and will receive notification of test results. When information indicates that employee noise exposure may equal or exceed the eight hour time-weighted average of 85 decibels, Fox-1 shall implement and maintain a regular audiometric monitoring program. Fox-1 managers shall identify all affected employees whose exposures equal or exceed an eight hour time-weighted average of 85 decibels and each will be included in the hearing conservation program.

A valid baseline audiogram will be established within six months of an employee's first exposure at or above the actionable level. This initial baseline audiogram will be used for comparison against future audiograms. If a mobile van is used, the baseline shall be established within one year. Testing to establish the baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Employees in affected positions will be notified to avoid prolonged exposure to high levels of noise by wearing hearing protection.

Fox-1's program provides for an annual audiogram of each affected employee. If a standard threshold shift has occurred, the Fox-1 employee will be notified in writing within 21 days of determination. In the case that a threshold change occurred, the use of hearing protection shall be reevaluated or refitted, and, if necessary, a medical evaluation

may be required. As the concerned employer, Fox-1 will evaluate hearing protection for the specific noise environment in which the protector will be used.

Fox-1 will sponsor initial and annual hearing conservation training for all employees in job functions exposed to actionable occupational noise. Each employee in continuing noise exposed positions will participate in the annual awareness and safety training. If a current employee's job function changes to one in a noise-exposed role, the employee must first undergo hearing conservation training in which appropriate PPE and work processes are discussed before assuming that new position. Training shall be updated consistent to changes in PPE and work processes.

Fox-1's safety policy regarding hearing conservation will be made available to all employees. Additionally, Fox-1 will post a copy in the workplace. The Fox-1 corporate office will make available at request all records pertaining to the hearing conservation program and related training program. Fox-1's corporate office will maintain accurate and timely records of all employee exposure measurements. All records will be maintained per applicable regulations.

### **Lifting and Back Safety**

When lifting or moving a load, take appropriate precautions. Size up the load and if it is too heavy, seek help or use mechanical means to do the job. Know what you are doing or where you are going with the load before picking it up. Tuck your pelvis by tightening your stomach muscles. This will help you stay balanced while lifting. Bend your knees and let your strong leg muscles, not your back, do the lifting. Hug the load and gradually straighten your legs to a standing position. Avoid twisting your spine and back as this can lead to injury. Make sure your feet, knees, and torso are pointed in the same direction while lifting. Always have a clear vision above the load. Get help if the load interferes with your normal walking function. Housekeeping is important as objects on the floor can present a tripping hazard to persons carrying a load. When lowering the object, perform the above steps in reverse.

### **Housekeeping**

To minimize slipping, tripping, falling, and fire hazards, employees are expected to practice good housekeeping during the job and must clean up their work area regularly. Spills must be cleaned up immediately. Debris must be picked up and disposed of properly. Electrical cords, hoses, ropes, and wires must be rolled up and properly stored or disposed of. Employees are responsible for cleaning up after themselves.

### **Short Service Employee (SSE) Policy**

The purpose of this Short Service Employee (SSE) Policy is to ensure that contractor employees with less than three months experience are identified, adequately supervised, trained, and managed so as to prevent injury to themselves or others, property damage, or environmental harm. This policy only applies to Fox-1 employees working on site at

refineries or plants in a skilled craft position or one in which they have hands-on duties that bring them into the operational units within a plant.

Any contractor with less than three months service in the same position with Fox-1 will be considered a Short Service Employee (SSE).

Non-SSE contract employees who are moved to a new location should be considered for inclusion in the SSE program based on the specifics of their assignment. Job duties, work practices, equipment used, and skill level are factors to consider. The immediate operational supervisor shall assess if the contract employee is SSE or not.

A SSE employee shall not work independently. Two to four person crews can only have one SSE per crew. Exceptions to this rule shall be determined by the operational supervisor.

All SSE personnel must attend location specific safety training prior to beginning work on location. Applicable contractor and HSE policies will be discussed during orientation. SSE personnel will be partnered with a mentor to assist the employee during the SSE period. SSE personnel will be identified by special hardhats or stickers on clothing, or whatever method determined best by the operational manager.

If the SSE employee successfully completes three months of employment with incident free performance, proactive participation in safety meetings, and exhibits general awareness and working knowledge of Fox-1's and the customer's safety requirements, the employee shall be removed automatically from SSE status. Performance shortcomings, mistakes, or the like may result in an employee being considered SSE beyond three months of employment based on the judgment of the operational supervisor.

### **Forklift Safety Program**

Material handling is a significant safety concern. During the movement of products or materials there are numerous possibilities of personal injury and property damage if proper procedures and caution are not used. This program applies to all powered industrial trucks, including forklifts, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines. The information in this program and applicable standards should be used to train prospective industrial truck operators and provide the basis for refresher and annual retraining.

The Fox-1 operational managers are responsible for administering the forklift training program and shall ensure that Fox-1 employees who use forklifts are properly trained.

Fox-1 employees who operate forklifts must follow the safe operating procedures specified below.

### **Pre-Qualifications for Powered Industrial Truck Operators**

All candidates for powered industrial truck (PIT) operators must meet the following basic requirements prior to starting initial or annual training:

- Possess a valid driver's license and good driving record.
- No vision problems that cannot be corrected by glasses or contacts.
- No hearing loss that cannot be corrected with hearing aids.
- No physical impairments that would prohibit safe operation of the PIT
- No neurological disorders that affect balance or consciousness.
- Not taking any medication that affects perception, vision, or physical abilities.

### **Training**

An experienced operator, selected by the operational manager, must conduct training for PIT operators. All training and evaluation must be completed before an operator is permitted to use a PIT without continual and close supervision. Trainees may operate a PIT only under the direct supervision of persons who have the knowledge, training, and experience to train operators and objectively evaluate their competence.

### **Safe Operating Procedures**

- Only authorized personnel may operate PITs.
- The operator will always wear a seatbelt during machine operation. All PITs will be furnished with standard safety equipment.
- The operator will perform pre- and post-trip inspections.
- Any safety defects on the PIT must be immediately reported to the operational manager and repaired prior to use.
- Operators must follow proper recharging and refueling safety procedures.
- Loads will be tilted back and carried no more than six inches from the ground. Loads that restrict the operator's vision will be transported backwards.
- Plant or warehouse speed limits will be followed. Slow down on wet floors, going around turns, and at intersections. Use extreme caution around other forklifts or PITs. Do not pass another PIT if your vision is obstructed.
- PIT operators in high lift areas must wear hard hats.
- Extreme caution must be used when meeting pedestrians, making turns, and cornering. Use the horn if unsure if a pedestrian sees you.
- Passengers may not ride on any portion of a PIT; no horseplay is allowed. If PITs are used as a man-lift, an appropriate man-lift platform will be used.
- Aisles will be maintained free from obstructions, marked, and wide enough (six-foot minimum) for vehicle operation.
- Loads must not exceed rated weight limits.
- When unattended, PITs will be turned off, forks lowered to the ground, and the parking brake applied.
- Operators must report all accidents, minor to serious, to the Fox-1 operational supervisor.
- When loading rail cars and trailers, dock plates will be used. Operators will assure dock plates are in good condition and will store them on edge when not in use.

- Operators must strictly follow prescribed docking/undocking procedures. Rail cars and trailers will be parked squarely to the loading area and have wheels chocked in place.
- Use good judgment at all times. If there is a question of safety, ask a more knowledgeable staff member before performing the task. There is zero tolerance for horseplay or stunt driving; this behavior will result in termination from employment.

### **Motor Vehicle Operation / Driving Policy**

Before Fox-1 can authorize an employee to use a private or personal vehicle on official company business, the employee needs to adhere to the following:

- Obtain a Fox-1 supervisor's permission to operate any vehicle on Fox-1 business.
- Maintain a valid state drivers license (foreign licenses are not permitted) and current automobile insurance. The drivers license must be appropriate for the job and vehicle to be operated (i.e.; class A, B, C).
- Have and maintain a good and safe driving record. The Fox-1 operational manager will review driver's motor vehicle record from the DMV during the pre-employment process. If a Class A, B, or Special Class C driver, you are responsible for providing (at your cost) an original DMV record to the employing department at the time of your interview.

A Fox-1 employee who is driving to conduct company business and is involved in a motor vehicle accident must follow the listed steps below:

1. Make no comment or statement regarding the accident to anyone except investigating police, your supervisor, state officers, or an identified insurance representative or adjustor.
2. Do call the police or 911 in the event of an injury accident.
3. Exchange information with the other driver. Record specific information including other driver's name, address, phone number, car license plate, time/date of accident, particular causal events, and the like.
4. Immediately call your Fox-1 supervisor to give a verbal report of the accident. If no answer, call the main Fox-1 number at 651-894-3990 and ask for human resources or the office manager. Fox-1 supervisors will inform you of the next steps in this process.

Fox-1 employees assigned to Flint Hills Resources, Koch Pipelines, or other similar plants, will be given specific safety rules and regulations pertaining to driving a vehicle inside the gates and secured environment of the plant or refinery. Rules of the customer site for driving inside the plant area must be stringently followed or the employee will face corrective action up to and including termination.

All State and Federal driving laws and regulations must be followed at all times by Fox-1 employees driving on company business.

## **Benzene Awareness Policy**

Fox-1, a contractor to heavy industrial plants, may fulfill job functions in which Fox-1 employees have a possibility of exposure to benzene during an unplanned accident or incident. Employees may be exposed to benzene while working on location at petroleum refining sites, tank gauging locations (pipelines, tanks, refining operations), or during field maintenance.

Attributes of benzene include flammability, toxicity, colorlessness, aromatic odor, and non-solubility in water. Negative health effects occur when a person comes in contact with benzene. Effects include eye and skin irritation. Also, a person may feel breathless, euphoric, or irritable.

When working in areas possibly polluted by benzene, an employee must wear required PPE. Required PPE may include boots, gloves, long sleeves, aprons, eye/face protection. Safety precautions must be taken as benzene liquid is highly flammable. Vapors may form explosive mixtures in air. Fire extinguishers must be readily available in possibly affected areas. Smoking is always prohibited near benzene storage or use.

Fox-1 employees working in affected job functions will undergo initial and annual benzene awareness training, as well as general plant safety training. Employees in specific roles with possible benzene exposure will be informed of emergency contingency plans and locations of benzene storage in the facility.

## **Fire Protection and Extinguisher Policy**

Certain Fox-1 employees in affected job functions who work on-site at Koch plants, Koch Pipeline, Flint Hills Resources, or other industrial plants are required to be trained initially and annually on proper use of portable fire extinguishers in the workplace. Additionally, the training session will familiarize employees with general principles of the fire extinguisher use and the hazards involved in incipient stage fire fighting.

If applicable, Fox-1 managers will assure that portable fire extinguishers are subjected to monthly visual checks, as well as annual maintenance checks. This way, equipment will be in ready working order if needed.

## **FOX-1 OFFICE STAFF**

### **Office Emergency Response Procedures**

**NOTE:** When assigned to a client location it is the responsibility of the employee to learn and understand the emergency procedures of that client site.

In the event during normal business hours emergency assistance is required at Fox-1, the following action would be taken:

1. Designated employee (office manager) dials 911 or police department (for non-emergency).

2. Employee informs police or 911 operator of situation requiring assistance.
3. Employee notifies company owner or highest-ranking manager available of the situation and directs police to the appropriate area of the building.  
Company manager should evacuate employees if necessary.
4. At conclusion of incident, company owner or manager allows employees back into work area. If company owner is not present, manager should phone company owner to advise of the incident.

### **Emergency Evacuation Procedure**

**Scope:** Eagan Office

**Purpose:** Evacuate all Fox-1 employees and guests from the office.

**Process:**

1. Decision or event occurs facilitating evacuation from the building.
2. Alarm is sounded to leave the building.
3. All employees leave the building via the nearest exit and make their way to the meeting spot. The meeting spot is the large parking lot by the front Fox-1 entrance.
4. Company managers meet and determine headcount to account for all employees and guests.

### **Summary**

Safety of employees is essential. Fox-1 is committed to providing the most safe and secure work environment possible. Safety is not just the responsibility of company managers; cooperation and active involvement of all employees in the safety program is the only way to claim success. If each employee follows safety guidelines, our program will be a guaranteed triumph!