



TRIPLE S TRUCKING CO., INC. Health, Safety and Environment Policy Manual

January 1, 2009

Dear SSS Employees:

Triple S Trucking, Co., Inc. began operations in 1964. From the time that the Sandel family started Triple S Trucking, we have had one guiding principle: Treat our Employees like family.

Your health and safety is the most important thing to our Management. We care for your safety and our goal is that each of you returns home each day without an injury.

Over time, we have seen the oilfield change in many ways. But, our commitment to our Employees has remained the same. SSS always has been, and always will be, a company that is no better than the worst frontline Employee. This is why the SSS management expects only the best from our Employees.

During my time in the oilfield, I have seen accidents and incidents resulting in environmental damage, personal injury and even death. I commit to you that this manual is designed with you in mind. It is my hope that by following the safe practices set forth in this manual our Employees will be able to achieve a perfect day.

To you, our Employees, we appreciate the great job you are doing and your efforts in creating a safe work place.

Sincerely yours,

A handwritten signature in black ink that reads 'Jerry Sandel'.

Jerry Sandel
President



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1. Amendment Summary

Version	Date	Description
01.001	January 1, 2009	First issue of document
01.002k	June 1, 2010	Revisions/additions in Sections: 5, 9, 12, 14, 16, 21, 24, 34, 39, 42, 43



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2. Important Information

2.1 Contact Numbers

Triple S Trucking Main Office (Water Department).....	505-334-6193
Triple S Trucking Main Office (Rig up Department).....	505-334-6196
Triple S Trucking Safety and Environmental Supervisor.....	505-334-6193
Durango Hospital.....	970-247-4311
Hazardous Materials Hotline.....	800-424-9300
Medical and Fire Emergencies.....	911
Poison Control Hotline.....	800-432-6866
San Juan County Regional Emergency Room.....	505-599-6100
San Juan County Regional Medical Center (Main Switchboard)...	505-325-5011
San Juan County Non-Emergency Dispatch.....	505-334-6622

2.2 Policy Book Locations

In an effort to ensure all SSS Employees have constant access to this SSS HSE Policy Manual, copies of this Manual can always be found at:

- Triple S Trucking Rig Up/Water Main Office
- Triple S Trucking Rig Up/Water Shop Office
- Aztec Service Facility Main Office
- Aztec Service Facility Field Office

2.3 Questions

If there are ever any questions regarding the policies contained in the SSS HSE Policy Manual, SSS Employees are encouraged to seek assistance in order to gain greater knowledge and understanding. SSS Employees should always seek assistance and clarification from their Supervisor.

2.4 SSS Chain of Command

Unless otherwise noted within specific SSS HSE policies, SSS has established and utilizes a systematic management approach to all operations. Often times the term “Immediate Supervisor” is used within the SSS’ HSE policies. An Immediate Supervisor is a SSS Employee’s designated Supervisor for specific SSS operations (e.g., Swamper to Driver, Driver to Truck Pusher, and Truck Pusher to General Manager). Triple S recommends that SSS Employees utilize this established chain of command unless specific circumstances prevent its use.



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2.5 *At Will Employment*

EMPLOYMENT WITH EMPLOYER IS VOLUNTARY AND "AT WILL." THIS MEANS THAT EITHER THE EMPLOYEE OR THE EMPLOYER MAY TERMINATE THE EMPLOYMENT RELATIONSHIP AT ANY TIME AND FOR ANY REASON. NOTHING CONTAINED IN THIS STATEMENT OF EMPLOYMENT POLICIES AND PRACTICES CREATES OR CONSTITUTES A CONTRACT OF EMPLOYMENT.

2.6 *Harassment*

- A. EMPLOYER EXPECTS ALL EMPLOYEES TO WORK IN A MANNER THAT RESPECTS THE FEELINGS OF THEIR CO-WORKERS. IT IS THE POLICY OF EMPLOYER THAT ALL EMPLOYEES HAVE THE RIGHT TO WORK IN AN ENVIRONMENT FREE FROM HARASSMENT BASED UPON RACE, RELIGION, COLOR, SEX, AGE, NATIONAL ORIGIN, ANCESTRY, PREGNANCY, DISABILITY, OR ANY OTHER CHARACTERISTIC PROTECTED BY LAW. ANY HARASSMENT OF EMPLOYEES BY THEIR CO-WORKERS, SUPERVISORS, OR THIRD PARTIES WILL NOT BE TOLERATED.

- B. UNLAWFUL HARASSMENT CAN INCLUDE PHYSICAL CONTACT OR VERBAL ABUSE OR KIDDING WHICH IS DIRECTED AT ANOTHER INDIVIDUAL BECAUSE OF THAT INDIVIDUAL'S RACE, RELIGION, COLOR, SEX, AGE, NATIONAL ORIGIN, ANCESTRY, PREGNANCY, DISABILITY, OR ANY OTHER CHARACTERISTIC PROTECTED BY LAW AND WHICH IS CONSIDERED UNACCEPTABLE OR UNWELCOME BY ANOTHER INDIVIDUAL. THIS MAY INCLUDE COMMENTS AND COMPLIMENTS THAT EXTEND BEYOND MERE COURTESY, OFFENSIVE VISUAL MATERIAL, INAPPROPRIATE GESTURES, HOSTILE BEHAVIOR, JOKES THAT ARE CLEARLY UNWANTED OR CONSIDERED OFFENSIVE, AND OTHER COMMENTS, INNUENDO, OR ACTION THAT OFFENDS OTHERS.



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- C. IMPERMISSIBLE SEXUAL HARASSMENT INCLUDES:
- (1) SEXUAL ADVANCES AND OTHER VERBAL OR PHYSICAL CONDUCT WHERE SUBMISSION TO THE CONDUCT IS MADE A TERM OR CONDITION OF EMPLOYMENT OR IS USED AS THE BASIS FOR EMPLOYMENT DECISIONS, AND
 - (2) UNWELCOME VERBAL OR PHYSICAL CONDUCT OF A SEXUAL NATURE THAT UNREASONABLY INTERFERES WITH AN EMPLOYEE'S WORK OR CREATES A HOSTILE OR ABUSIVE WORK ENVIRONMENT.
- D. AN EMPLOYEE WHO BELIEVES THAT HE OR SHE IS BEING HARASSED IN VIOLATION OF THIS POLICY, WITNESSES HARASSMENT IN VIOLATION OF THIS POLICY, OR HAS ANY GRIEVANCE OR COMPLAINT AGAINST ANY EMPLOYEE OR SUPERVISOR SHOULD BRING THE MATTER TO THE ATTENTION OF HIS OR HER SUPERVISOR(S), JERRY SANDEL, OR STEWART PETERSON. THERE WILL BE NO RETALIATION BY THE EMPLOYER FOR BRINGING A HARASSMENT COMPLAINT.
- E. EMPLOYEES THAT ENGAGE IN ANY FORM OF HARASSMENT FACE SERIOUS CONSEQUENCES, UP TO AND INCLUDING TERMINATION OF EMPLOYMENT.



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3. Introduction

The SSS HSE Policy Manual serves as a reference for Triple S Trucking Co., Inc.'s (SSS) rules, standards and expectations for SSS Employees at all places of operation. The guidance in this policy manual is subject to unilateral change, modification, suspension, interpretation, cancellation, deletion, or amendment by SSS Management at anytime. All Employees should consult all other applicable SSS sources for more detailed policy and procedure reference materials or procedures. While the SSS HSE Policy Manual provides Employees with information regarding SSS policies, Employees must also meet or exceed all rules and standards implemented according to our customers, and all applicable legal and regulatory requirements.

3.1 Company Mission Statement

The Mission of Triple S Trucking Co. is to build partnerships with our customers, and our employees to provide the highest QUALITY work product at a fair price.

3.2 Our Commitment

As an essential element of QUALITY, SSS is committed to CARING for the Health and Safety of everyone who plays a part in our operations, or who we may impact. Wherever we operate, we will conduct our business with respect for the environment. Our obligation is to be the leader in personnel training, developing and implementing safe work practices, and in persistent learning to fulfill our HSE commitment. We will not be satisfied until we succeed in eliminating all injuries, occupational illnesses, unsafe practices and incidents of environmental harm, from our activities.

3.3 Our Values

Employees and their families are our most important assets. Accidents do not have to be a part of our business. Employees can be successful, make money and not be injured. We CARE about each and every employee, and want everyone to go home in as good, if not better, shape than when they came to work.



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3.4 Strategies for Achieving Our Commitment

An “Incident and Injury Free” workplace is the safety culture which is desired and expected. Achieving that expectation is the responsibility of management, and employees at all levels of the company.

We will demonstrate visible and active leadership, by engaging employees, service providers and customer partners, with clear responsibilities and accountabilities.

We will demonstrate visible and active leadership, by requiring safety leadership as a responsibility of management and front-line supervisors, with clear responsibilities and accountabilities.

We will ensure that all employees understand that working safely is a condition of employment, and that they are each responsible for their own safety, and for the safety of those around them.

SSS requires all Employees to work according to safe standards, and in accordance with all SSS HSE policies, to ensure the safest work conditions possible, and to keep the workplace and equipment free from recognized and potential hazards.

The SSS HSE Policy Manual provides Employees with SSS’ basic rules and in-depth policies. As a condition of employment at SSS, every Employee is required to learn, understand, follow and implement each applicable rule and policy.

Through the proper utilization of the SSS Safety Management System, SSS Employees are provided the necessary tools to foster safe work attitudes, recognize and avoid hazards, and eliminate workplace incidents, thereby ensuring each Employee’s health and safety, in addition to protecting our environment.

Through Managers, Supervisors and Employees working together, communicating and following the rules, we can continually improve our health, safety and environment. Ultimately, through daily, weekly, monthly and annual improvement, SSS will achieve a perfect safety record of zero (0) accidents – one day at a time.



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4. Legal

4.1 *Disclaimer*

The SSS HSE Policy Manual is designed to reflect company policies, which are subject to unilateral change, modification, suspension, interpretation, cancellation, deletion, or amendment by SSS Management at anytime; therefore, the SSS HSE Policy Manual is not a binding legal contract. Instead, this SSS HSE Policy Manual is intended to provide guidance to Employees. The SSS HSE Policy Manual does not alter any Employee's "at-will" status, or grant any other legal rights to any SSS Employee. "At-will" means that either the Employee or SSS may terminate the employment relationship at any time, and for any reason. Nothing in the SSS HSE Policy Manual creates or constitutes a contract of employment.

4.2 *Severability*

If any part or application of the SSS HSE Policy Manual is held invalid, updated, revised or otherwise changed, the remainder of its application to other situations and persons, shall not be affected.

4.3 *Conflicts*

In the event of conflict with other rules, regulations and laws, the provisions of those rules, regulations and laws shall supersede the SSS HSE Policy Manual provisions. In the event of conflict with SSS customers' rules, policies and procedures, SSS Employees shall consult with their Immediate Supervisor for further direction. SSS Supervisors shall contact a SSS Safety and Environmental Supervisor for further direction, if needed.

4.4 *Responsibility and Authority*

- a) A SSS HSE Supervisors are responsible, after seeking the cooperation of SSS Senior Management, SSS General Managers and/or SSS Employees, for all facets of the SSS Safety Management System including implementation, update and compliance of the policies promulgated by SSS in this SSS HSE Policy Manual and other related SSS sources of policies and procedures.
- b) SSS HSE Supervisors have full authority, after seeking the cooperation of SSS Senior Management, SSS General Managers and/or SSS Employees, to make necessary decisions to ensure the success of this



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System including, but not limited to, the correct implementation of the policies included in this SSS HSE Policy Manual, and other related SSS sources of policies and procedures.

- c) SSS HSE Supervisors shall develop, after seeking the cooperation of SSS Senior Management, SSS General Managers and/or SSS Employees, additional amendments and/or updates, detailed written instructions, training programs and associated forms where required by SSS policies, contractor policies, and/or local, state and/or federal regulations and/or laws.
- d) SSS HSE Supervisors, after seeking the cooperation of SSS Senior Management, SSS General Managers and/or SSS Employees, are responsible for training all SSS Employees in all facets of the SSS Safety Management System, including SSS HSE Policies where required by SSS policies, contractor policies, and/or local, state and/or federal regulations and/or laws.
- e) SSS HSE Supervisors, after seeking the cooperation of SSS Senior Management, SSS General Managers and/or SSS Employees, are responsible for reviewing and/or updating SSS policies periodically (annually), unless otherwise specified, to ensure compliance with other SSS policies, contractor policies, and/or local, state and/or federal regulations and/or laws.

4.5 Compliance

Each individual Employee is responsible for complying with all rules, policies and procedures established in the SSS HSE Policy Manual. Additionally, SSS Employees shall adhere to all rules and policies contained in supporting documents promulgated by SSS. In cases where specific rules, policies and/or procedures are deemed to be detrimental to the SSS Mission Statement, **each SSS Employee has the duty, responsibility and obligation to stop work activities that are unsafe.**

4.6 Discipline or discharge

Employees who do not comply with the rules and policies established in the SSS HSE Policy Manual, and rules and policies in supporting documents promulgated by SSS, are subject to discipline or discharge in accordance with the At Will or the SSS Positive Reinforcement and Progressive Discipline Policy.



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5. Acronyms

- a) **"dBA"** - Decibel, a unit of measure for noise levels
- b) **"EMS"** - Environmental Management System
- c) **"HAZCOM"** - Hazardous Communication
- d) **"HAZWOPER"** - Hazardous Waste Operations and
Emergency Response
- e) **"HSE"** - Health, Safety and Environment
- f) **"IIF"** - Incident & Injury Free
- g) **"JHA"** - Job Hazard Analysis
- h) **"LD"** - Light Duty
- i) **"LTI"** - Lost Time Incident
- j) **"LOTO"** - Lock-out/Tag-out
- k) **"LZ"** - Landing Zone
- l) **"MOC"** - Management of Change
- m) **"MSDS"** - Material Safety Data Sheet
- n) **"MMI"** - Maximum Medical Improvement
- o) **"NMOGA"** - *New Mexico Oil and Gas Association*



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- p) **"OCD"** - stands for the New Mexico Energy Minerals and Natural Resources Department *Oil Conservation Division*
- q) **"OSHA"** - *Occupational Safety and Health Administration* of the United States Department of Labor
- r) **"PPE"** - Personal Protective Equipment
- s) **"RD"** - Restricted Duty
- t) **"RTW"** - Return to Work
- u) **"SMS"** - Safety Management System
- v) **"SPCC"** - Spill Prevention Control and Countermeasure
- w) **"SRL"**- Self Retracting Lifeline
- x) **"SSS"** - Stands for *Triple S Trucking*
- y) **"WSL"** - Well Site Leader (Company Man)



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6. **“Perfect Day” Employee Guidelines**

6.1 ***Accountability and Responsibility***

Accountability: Every SSS employee is accountable to their colleagues, Supervisors and SSS Management for their own actions. Every SSS Employee shall comply with every applicable rule, policy and procedure in accordance with SSS HSE and Operational Policies. Per the OSH Act of 1970 “Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act, which are applicable to his own actions and conduct.”

Responsibility: Each Employee is responsible for their actions, and the actions of others within their control.

6.2 ***Do not perform unsafe acts***

Employees shall never perform, nor allow their co-worker to perform any tasks that they believe to be unsafe. **Each SSS Employee has the duty, responsibility and obligation to stop work activities that are unsafe.** Any such conditions or practices shall be stopped and reported to the Supervisor at once.

6.3 ***Keep workplace drug and alcohol free***

Drug and alcohol use and/or abuse threaten the safety of all SSS Employees and all persons who come onto our work locations. SSS’ HSE commitment is jeopardized when any applicant or Employee uses illegal drugs or alcohol on the job, or comes to work with these substances present in their body. Such Employees are subject to automatic termination in accordance with the SSS Drug and Alcohol Policy.



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6.4 Listen and act according to training

SSS Employees are routinely trained in all aspects of HSE topics and SSS HSE Policies. By ensuring effective training for SSS Employees, SSS provides the basic tools needed to achieve a “perfect day”. SSS Supervisors are held to a higher standard of SSS HSE Policy implementation, and as such have been instructed to familiarize Employees with healthy, safe and environmentally friendly operations and practices. Employees shall perform the tasks that their Supervisor instructs of them, except those deemed to be unsafe. Any unsafe practices required by a Supervisor shall be stopped and reported to SSS HSE personnel, or SSS Management, immediately.

6.5 Say what you do, do what you say, and prove it

Each Employee is responsible for his or her performance and to follow all rules, policies and procedures. Additionally, Employees shall constantly seek continual improvement through utilization of SSS’ Programs of Continual Improvement. SSS’ Programs of Continual Improvement always provide Employees the opportunity to “**SAY WHAT THEY DO, DO WHAT YOU SAY, AND PROVE IT**”.



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7. Programs of Continual Improvement

7.1 Job Hazard Analysis (JHA)

Utilizing the JHA Program will assist in training short-service Employees (green and orange hard hats), remind experienced Employees (white hard hats), and inform third party contractors and location visitors, of the hazards and potential hazards at any SSS work location.

When used correctly, in accordance with SSS' policy, the JHA Program will inform people of hazards, eliminate or limit exposure to those hazards, and identify methods to make a particular job safer each and every time it is performed.

The JHA Program properly assures specific tasks and responsibilities are assigned to each SSS Employee, and ensure that Employee's accountability for properly performing that task.

7.2 Field Observation Card- Near Hits/Potential Hazards, Behavior Observations, Stop the Job

7.2.1 Near Hits and Potential Hazards

Utilizing the *Field Observation Card* (Section D) encourages a systematic approach for SSS Employees (and others who are associated with our work activities) to learn based upon the actions or experience of others.

It ensures company-wide (and sometimes basin-wide or industry-wide) communication of potential health, safety and/or environmental hazards from actions, equipment or locations. When used correctly, the *Field Observation Card* will promote communication throughout SSS, so that every Manager, Supervisor, and Employee can improve activities, or avoid potentially unsafe conditions, or potential hazards and circumstances.



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7.2.2 Behavior Observations

The *Field Observation Card* (Sections A and B) is also used to record Behavior Observations, encouraging SSS Employees to assist one another (and others who are associated with our work activities) through observing each other's behaviors and actions.

When used correctly, in accordance with the SSS Behavior Safety Observation Policy (*please see section 16 of this manual*), SSS Employees are empowered to ensure recognition for safe work behavior or identify areas for improvement, through observing behaviors, and communicating either praise or concerns.

This Program is designed to encourage a professional workplace through peer review, immediate follow-up and identified corrective actions, based upon observations.

7.2.3 STOP THE JOB!

Each and every employee has the right and obligation to stop a task if they believe it may be unsafe. The Field Observation Card should be used for documentation, if it becomes necessary to *Stop the Job*. If you are involved in, or observe, a job/task that is being conducted unsafely, or you question if it is safe- PLEASE STOP THE JOB AND HELP TO MAKE IT SAFE!



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8. HSE Expectations Overview

8.1 Introduction

SSS believes as part of our HSE commitment that basic HSE expectation guidelines for SSS Employees are essential to ensuring workplace success.

8.2 Scope

The Basic HSE Performance Expectations Policy applies to all SSS Employees.

8.3 Purpose

The HSE Performance Expectations Policy serves as SSS' basic rules and standards at all places of operations. All Employees should consult the SSS HSE Policy Manual, and other applicable sources for SSS policies and procedures, for more detailed reference materials and/or procedures.

8.4 Required Forms

SSS Employees and Supervisors shall utilize the applicable "SSS" Field Observation Card, New Mexico Notice of Accident or Occupational Disease Disablement, Job Hazard Analysis, Management of Change, or other forms, as identified in the Basic HSE Performance Expectations Policy section of the SSS HSE Policy Manual.

8.5 Policy

- 1) Participate in all SSS safety programs.
- 2) Follow the rules.
- 3) Don't do anything unsafe – even if someone tells you to do it.
- 4) ***Stop the Job!***
- 5) Communicate- with other drivers, swappers, Gaugers, Truck Managers, and Dispatch/Office.
- 6) Report everything.
- 7) Treat others the very same way you would like to be treated.

8.6 General Employee Responsibilities

- a) The primary responsibility of SSS Employees is to perform duties in a healthy, safe and environmentally conscious manner.



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- b) SSS Employees shall take responsibility for their own safety first.
- c) **STOP THE JOB!** Employees shall make the safety of others a priority. If you are involved in, or observe, a job/task that is being conducted unsafely, or you question if it is safe- **PLEASE STOP THE JOB AND HELP TO MAKE IT SAFE!** STOP all hazardous activities, and report them to your Supervisor IMMEDIATELY.
- d) SSS Employees shall immediately report, and subsequently document on a New Mexico Notice of Accident or Occupational Disease Disablement, all personally incurred injuries. In addition, SSS Employees shall immediately report all injuries that are observed at work (including third party) to their Supervisor – no matter how small.
- e) SSS Employees shall learn, apply and share safe work practices applicable to their job. Remember that no job is so important or urgent, that we cannot take the time to do it safely.
- f) SSS HSE rules, policies and procedures shall not be compromised.
- g) SSS Employees shall cooperate and take training very seriously.
 - Take responsibility for ensuring that you have had the proper training for the task at hand.
 - Request explanations for work rules, policies and procedures that you do not fully understand.
 - Do not start, or work on any task that you do not fully understand.
- h) SSS Employees shall be alert for hazards. SSS Employees shall report any equipment, safety equipment (PPE, harnesses, lanyards, respirators, etc.) and machinery that they consider to be in an unsafe condition, oversized, or undersized, to their Supervisor at once.
- i) SSS Employees shall actively participate in all safety discussions and programs- JHA, Field Observations, and freely give input for improving safety and reducing workplace hazards.
- j) SSS Employees shall maintain high standards of orderliness and housekeeping.
- k) SSS Employees shall provide the relief Employee (driver to driver, gauger to gauger, and pusher to pusher) with complete and accurate change-over information, pointing out current and upcoming operations, any changes in equipment conditions, and known hazards.
- l) SSS Employees shall understand and follow all safety signs and warnings.



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8.7 Behavioral Rules

- a) SSS Employees shall always keep alert.
- b) Practical joking or horseplay while working is prohibited for any SSS Employee.
- c) SSS Employees shall not smoke, except in designated areas. Designated areas shall be no less than one hundred and fifty (150) feet from any potential flammable source.
- d) SSS Employees shall not put themselves at risk of injury, nor compromise safety, by taking a short cut.
- e) SSS Employees shall not slide down the winch line, gin poles, or stairway handrails.
- f) SSS Employees shall never ride on moving trucks, trailers, or any equipment that is not specifically designed and constructed for the transportation of personnel.
- g) SSS Employees shall not perform personnel lifts with equipment not rated to lift people.
- h) SSS Employees shall never run on location.
- i) SSS Employees shall report any hazards to their Supervisor immediately. Hazards shall be corrected immediately.
- j) SSS Employees shall use Field Observation Cards for documentation of hazards.
- k) SSS Employees shall use only appropriate ladders designed for the task at hand.
- l) The possession or use of drugs, drug paraphernalia, and alcohol by SSS Employees, is strictly prohibited in accordance with the SSS Drug and Alcohol Policy.
- m) SSS Employees shall not use compressed air for cleaning purposes.
- n) SSS Employees shall keep portable toilet facilities orderly, immediately reporting any necessary maintenance.
- o) SSS Employees shall immediately contain all leaks utilizing drip pans, absorbent pads or other means as necessary, and follow appropriate rules, policies and procedures to have leaks repaired.
- p) SSS Employees shall make every effort to report any spill to their Supervisor. SSS Supervisors shall report any spill to the SSS Safety and Environmental Supervisor, and appropriate SSS customers in accordance with the SSS Spill Prevention Control and Countermeasure Policy and other applicable spill reporting policies. Any additional required reporting to appropriate governmental regulatory agencies, shall be conducted by an SSS Safety and Environmental Supervisor.
- q) SSS Employees shall only remove a spilled liquid if directed to do so by their Supervisor. Supervisors shall verify and implement spill clean-



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- up procedures in accordance with SSS customers' direction, and/or the direction of an SSS Safety and Environmental Supervisor.
- r) SSS Employees shall keep all containers labeled with the type of material being contained.
 - s) SSS Employees shall ensure all valves are capped, and equipment is free from leaks, prior to transport to prevent spills.
 - t) When on remote locations, SSS Employees shall be familiar with the location of shutoff valves and switches. The shutoff valves and switches may be needed for use in an emergency.
 - u) SSS Employees shall not permit the exposure of any pressurized valve to an ignition source.
 - v) SSS Employees shall not stand in front of any pressurized valves while opening or closing the valve. Instead, all Employees will stand safely to the side, while slowly opening or closing the valve.
 - w) **The REAR valve on the vacuum tank MUST BE USED when loading or unloading produced water.**
 - x) **The FRONT valve must be used ONLY when loading or unloading fresh water.**
 - y) When hauling hazardous materials, smoking shall not be permitted in the vehicle.
 - z) SSS Employees shall avoid pinch points and strike zones, and shall NEVER place themselves between a truck or trailer, and the equipment being loaded or unloaded.
 - aa) SSS Employees shall NEVER place themselves beneath, nor touch, a suspended load.
 - bb) Tag lines shall be utilized to maintain control of suspended loads, except where the use of such lines would create a greater hazard. Tag lines shall be of a length, such that the user will not be drawn into/under the suspended load. The line must be in good condition, and cannot contain knots or cuts.
 - cc) SSS Employees shall never touch a suspended load with any part of their body. More than one tag line may be used if the situation warrants.
 - dd) Tag lines shall be made of natural or synthetic fiber rope, or synthetic strap. Wire rope or metal chain shall not be used for tag lines.
 - ee) SSS Employees shall not jump from trucks, trailers, or equipment.
 - ff) SSS Employees shall never attempt to do a job alone, which cannot be done safely by one person. Always take the time to obtain assistance.
 - gg) SSS Employees shall be alert for hazards such as nails, sharp edges on equipment and drum tops, and eliminate these and other hazards immediately.



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8.8 Fire safety

- a) In case of fire, SSS Employees shall follow the Emergency Action Plan Policy.
- b) In case of fire, SSS Employees shall immediately alert the Supervisor, every other person on location, and persons in the immediate area as to the fire danger. SSS Supervisors shall immediately call the fire department (911).
- c) SSS Employees shall ensure adequate type ABC fire extinguishers are in the SSS vehicle they are operating. All SSS Trucks are required by DOT regulations to carry a minimum of one fire extinguisher.
- d) SSS Employees shall operate fire extinguishers in accordance with PASS: (P) pull pin, (A) aim at the base of the flame, and (SS) sweep side to side. If the fire is not controllable using portable extinguishers, evacuate the area.

8.9 Housekeeping rules & General Maintenance

- a) The work area and entire location (including truck cabs) shall be kept clean and clear of any debris or trash by SSS Employees.
- b) Trash shall be put in proper waste disposal receptacles, containers and or areas, in accordance with the SSS Waste Management Policy.
- c) After using tools, material, etc., SSS Employees shall immediately put items in proper storage places.
- d) SSS Employees shall keep vehicles, walkways, stairways and exits, maintained and clear of obstructions and hazards.
- e) SSS Employees shall keep materials storage and equipment areas clear of debris.
- f) SSS Employees shall store cables coiled in a basket, or wound on a spool, to prevent damage.
- g) SSS Employees shall keep truck beds and trailers swept off and free of debris.
- h) SSS Employees shall keep vehicles, truck beds, trailers, catwalks, and possum bellies free of debris, and shall keep all equipment secured.
- i) Good general maintenance also goes hand-in-hand with good housekeeping and a safe work environment. Ensure broken or missing parts are replaced as soon as they are noticed; address leaks right away.

8.10 Hours of Service Policy

As addressed by the DOT (Department of Transportation, Federal Motor Carrier Safety Regulations, as follows:



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§395.3 Maximum driving time for property-carrying vehicles

Subject to the exceptions and exemptions in § 395.1:

(a) No motor carrier shall permit or require any driver used by it to drive a property-carrying commercial motor vehicle, nor shall any such driver drive a property-carrying commercial motor vehicle:

(a)(1) More than 11 cumulative hours following 10 consecutive hours off-duty;

(a)(2) For any period after the end of the 14th hour after coming on duty following 10 consecutive hours off duty, except when a property-carrying driver complies with the provisions of §395.1(o) or §395.1(e)(2).

(b) No motor carrier shall permit or require a driver of a property-carrying commercial motor vehicle to drive, nor shall any driver drive a property-carrying commercial motor vehicle, regardless of the number of motor carriers using the driver's services, for any period after-

(b)(1) Having been on duty 60 hours in any period of 7 consecutive days if the employing motor carrier does not operate commercial motor vehicles every day of the week; or

(b)(2) Having been on duty 70 hours in any period of 8 consecutive days if the employing motor carrier operates commercial motor vehicles every day of the week.

(c)(1) Any period of 7 consecutive days may end with the beginning of any off-duty period of 34 or more consecutive hours; or

(c)(2) Any period of 8 consecutive days may end with the beginning of any off-duty period of 34 or more consecutive hours.



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8.11 Oil Field Exemption

As addressed by the DOT (Department of Transportation, Federal Motor Carrier Safety Regulations:

§395.1 Scope of rules in this part.

(d) **Oilfield operations.** (1) In the instance of drivers of commercial motor vehicles used exclusively in the transportation of oilfield equipment, including the stringing and picking up of pipe used in pipelines, and servicing of the field operations of the natural gas and oil industry, any period of 8 consecutive days may end with the beginning of any off duty period of 24 or more successive hours.

(d)(2) In the case of specially trained drivers of commercial motor vehicles which are specially constructed to service oil wells, on duty time shall not include waiting time at a natural gas or oil well site; provided, that all such time shall be fully and accurately accounted for in records to be maintained by the motor carrier. Such records shall be made available upon request of the Federal Motor Carrier Safety Administration.

AND-

(g)(2) Specially trained driver of a specially constructed oil well servicing commercial motor vehicle at a natural gas or oil well location. A specially trained driver who operates a commercial motor vehicle specially constructed to service natural gas or oil wells that is equipped with a sleeper berth, as defined in §§395.2 and 393.76 of this subchapter, or who is off duty at a natural gas or oil well location, may accumulate the equivalent of 10 consecutive hours off duty time by taking a combination of at least 10 consecutive hours of off-duty time, sleeper-berth time, or time in other sleeping accommodations at a natural gas or oil well location; or by taking two periods of rest in a sleeper berth, or other sleeping accommodation at a natural gas or oil well location, providing:



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(g)(2)(i) Neither rest period is shorter than 2 hours;

(g)(2)(ii) The driving time in the period immediately before and after each rest period, when added together, does not exceed 11 hours;

(g)(2)(iii) The driver does not drive after the 14th hour after coming on duty following 10 hours off duty, where the 14th hour is calculated:

(g)(2)(iii)(A) By excluding any sleeper berth or other sleeping accommodation period of at least 2 hours which, when added to a subsequent sleeper berth or other sleeping accommodation period, totals at least 10 hours, and

(g)(2)(iii)(B) By including all on-duty time, all off-duty time not spent in the sleeper berth or other sleeping accommodations, all such periods of less than 2 hours, and any period not described in paragraph (g)(2)(iii)(A) of this section; and

(g)(2)(iv) The driver may not return to driving subject to the normal limits under §395.3 without taking at least 10 consecutive hours off duty, at least 10 consecutive hours in the sleeper berth or other sleeping accommodations, or a combination of at least 10 consecutive hours off duty, sleeper berth time, or time in other sleeping accommodations.



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9. Bloodborne Pathogen Policy, Exposure Control Plan, & Medical Records

9.1 Introduction

This SSS Bloodborne Pathogens Policy, Exposure Control Plan & Medical Records was developed and included in this Employee Policy Manual to control potential exposures to bloodborne pathogens, such as the HIV, hepatitis B or hepatitis C viruses. Employee Manuals containing this Exposure Control Plan are given out during new employee orientation, and are also kept in the field on drilling locations, for the purpose of ready access by employees.

9.2 Scope

The SSS Bloodborne Pathogens Policy applies to any SSS Employee who has potential to be exposed to blood or other bodily fluids. Exposure determination is made without regard of personal protective equipment. This includes, but is not limited to: Superintendent, Assistant Manager, Truck Manger, Shop Manager, and Gauger, trained in First Aid, rendering emergency care.

9.3 Purpose

The SSS Bloodborne Pathogens Policy enhances awareness and establishes measures to protect SSS Employees from occupational exposure to blood and other potentially infectious materials while still allowing SSS Employees to attend to the first-aid needs of accident victims.

9.4 Required Forms

- Bloodborne Pathogens Exposure Form

9.5 Training

All SSS Employees shall receive shall receive bloodborne pathogen specific training, as a part of First-Aid/CPR training during New Employee Orientation, and again on an annual basis.

9.6 PPE

- a) All SSS Employees who have potential to be exposed to blood and other bodily fluids shall know where Bloodborne Pathogens protective supplies and equipment are located.
- b) All SSS Employees who elect to provide first-aid shall ensure the use of proper PPE including (but not limited to): disposable, single use protective gloves; protective eye/face masks; protective CPR shields; and protective body garments such as aprons or impervious clothing.



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- c) The company shall provide all of this material at no cost to the employee. Multi-use PPE shall be replaced if it is found to be defective, prior to each use.

9.7 Bloodborne Pathogens Information

- a) Universal precautions shall be observed to prevent contact with blood or other potentially infectious materials. Under circumstances in which differentiation between body fluid types is difficult or impossible, all body fluids shall be considered potentially infectious materials.
- b) Engineering and work practice controls shall be used to eliminate or minimize employee exposure. Where occupational exposure remains after institution of these controls, personal protective equipment shall also be used.
- c) All SSS Employees who elect to provide first-aid shall wash hands and any exposed skin areas, immediately after removal of gloves and other PPE, after contact with blood or other potentially infectious materials.
- d) Antiseptic hand cleaner shall be available in building restrooms; in the field, antiseptic solutions and/or towelettes shall be provided.
- e) No SSS Employee shall eat, drink, smoke, use tobacco products, apply cosmetics, or handle contact lenses, in areas of potential contamination.
- f) SSS Employees who elect to provide first-aid shall properly clean any contaminated area using a disinfectant.
- g) SSS Employees who elect to provide first-aid shall remove all contaminated items and PPE from the contaminated area, and place them in a designated area and storage container. The removed items shall never be allowed to contaminate other areas, or other items.
- h) SSS Employees who elect to provide first-aid shall place blood and potentially infectious materials, in a sealable and leak-proof container. Disposal of all infectious wastes shall be in accordance with applicable Federal, State and Local regulations.
- i) Upon request, SSS will provide all SSS Employees, who are exposed to a potential bloodborne pathogen, a hepatitis B preventive injection at no cost to the employee. Employees who have been exposed to a potential contaminant shall sign a Bloodborne Pathogens Exposure Form, indicating refusal or acceptance of medical treatment.



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9.8 Exposure Control Plan & Medical Records Access

- a) Definitions:
 - 1) "Employee exposure record" means a record containing any of the following kinds of information: workplace monitoring information, biological monitoring information, an MSDS or a chemical inventory, etc.
 - 2) "Employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician, including: medical questionnaires, results of medical examinations, medical opinions, first aid records, description of treatments, employee medical complaints, etc.
- b) Employee exposure and medical records shall be kept for duration of employment plus 30 years. Training records shall be kept for 3 years from the date of training. These records shall be available for examination and copying to employees or OSHA, only with prior written consent of the employee.
- c) SSS shall, upon request, assure the prompt access of representatives of the Assistant Secretary of Labor for Occupational Safety and Health, to employee exposure and medical records, and to analyses using exposure or medical records.
- d) Access to records: Whenever an employee or designated representative requests access to a record, the employer shall assure that access is provided in a reasonable time, place, and manner. If the employer cannot reasonably provide access to the record within fifteen (15) working days, the employer shall within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay, and the earliest date when the record can be made available. Record copies are to be provided at no cost.
- e) Whenever access is requested to an analysis which reports the contents of employee exposure or medical records by either direct identifier (name, address, social security number, payroll number, etc.) or by information which could reasonably be used under the circumstances indirectly to identify specific employees (exact age, height, weight, race, sex, date of initial employment, job title, etc.), the employer shall assure that personal identifiers are removed before access is provided. If the employer can demonstrate that removal of personal identifiers from an analysis is not feasible, access to the personally identifiable portions of the analysis need not be provided.



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- f) Trade secret information disclosure must follow requirements as stated in 29 CFR 1910.1020 (f) (8).
- g) Upon an employee's first entering into employment, and at least annually thereafter, SSS shall inform current employees of the existence, location, and availability of any records covered by this section; the person responsible for maintaining and providing access to records; and each employee's rights of access to these records.
- h) Whenever an employer is ceasing to do business, the employer shall transfer all records subject to this section to the successor employer. Whenever an employer either is ceasing to do business and there is no successor employer to receive and maintain the records, or intends to dispose of any records required to be preserved for at least thirty (30) years, the employer shall transfer the records to the Director of the National Institute for Occupational Safety and Health (NIOSH), if so required by a specific occupational safety and health standard.



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10. Confined Space Entry Policy

10.1 Introduction

The SSS Confined Space Entry Policy contains requirements for practices and procedures, to protect personnel from the hazards of entry into confined spaces. This policy addresses permit required and non-permit required confined spaces, and is intended to:

- Prevent unauthorized and unintentional employee entry into a confined space.
- To assure safe entry into, and work within confined spaces by authorized employees only.

10.2 Definitions

A confined space is - a space that is large enough for personnel to enter, has limited or restricted means of entry or exit, and is not designed for continuous human occupancy.

A permit required confined space - means a confined space that has one or more of the following characteristics:

- 1) It contains, or has a potential to contain, a hazardous atmosphere.
- 2) It contains a material that has the potential for engulfing an entrant.
- 3) It has an internal configuration, such that an entrant could be trapped or asphyxiated, such as inwardly converging walls, or by a floor that slopes downward and tapers to a smaller cross section.
- 4) It contains any other recognized serious safety or health hazard.

Note: No SSS personnel shall be allowed to enter into a permit required confined space.

10.3 General

- a) Supervisors are responsible for implementing and enforcing the SSS confined space policy.
- b) Employees shall be informed of the existence and hazards of confined spaces, by posting of Danger signs or by other equally effective means, such as documented training.
- c) Confined spaces that can be casually or inadvertently entered, shall be effectively guarded to prevent unauthorized entry.



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10.4 Required Forms

Work in a Permit Required Confined space will not be allowed until an SSS Safe Work Permit is completed, and a safety meeting has been held. Permits must be dated and have an expiration time. Permits will not be valid for shifts other than the one in which the work started. Place the completed permit in a transparent envelope, a large Ziploc bag, or other protective holder, at or near the entrance of the confined space, for the duration of the work.

10.4.1 The entry permit must contain the following information:

- a) The permit required confined space to be entered.
- b) The purpose of the entry.
- c) The date and authorized duration of the entry permit.
- d) The names of authorized entry personnel, by a means that will enable the attendant to quickly and accurately determine which of the authorized employees are inside the permit required confined space.
- e) Personnel, by name, currently serving as attendants.
- f) Individual, by name, currently serving as entry supervisor, with a space for the signature or initials of the entry supervisor who originally authorized entry.
- g) The hazards of the permit required confined space to be entered.
- h) Measures used to isolate the permit required confined space and to eliminate or control permit required confined space hazards before entry.
- i) Initial and periodic gas tests, accompanied by the names or initials of the tester(s), and when the tests were run.
- j) Rescue and emergency services that can be summoned, and the means for summoning those services.
- k) Communication procedures used by authorized personnel to maintain contact during entry.
- l) A list of equipment such as personal protective equipment, testing, communications, rescue, and alarm systems required.
- m) Any other information that is necessary, given the circumstances of the particular confined space, in order to ensure employee safety.
- n) The identity of any additional permits, such as for hot work, that have been issued to authorize work in the permit required confined space.



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10.4.2 The entry supervisor shall terminate entry and cancel the entry permit when:

- a) The entry operations covered by the entry permit have been completed, or
- b) A condition that is not allowed under the entry permit arises in or near, the permit required confined space.

Note: No SSS personnel shall be allowed to enter into a permit required confined space.

10.5 *Exception to the Confined Space Entry Permit System Procedures*

There is one exception to the required use of the SSS Safe Work entry permit system that is dependent upon the nature of the confined space. The one exception is:

- Permit required confined space Reclassification to a non-permit-required confined space.

10.6 *Permit required confined space Reclassification*

A permit required confined space may be reclassified as a non-permit required confined space, if the following apply and are documented on an SSS JHA.

- a) If there are no actual or potential atmospheric hazards, and if all hazards within permit required confined space are eliminated without entry, the space may be reclassified for as long as the hazards remain eliminated.
- b) Hazards may be eliminated by such actions as purging or inerting tanks/vessels of contaminants, emptying, and the use of SSS lockout/tag out procedures for electrical/mechanical hazards. The control of atmospheric hazards through forced air ventilation does not constitute elimination of that hazard (it only controls the hazard: the SSS Safe Work Permit Procedures must be used in such cases).
- c) If entry is required to eliminate hazards, it shall be performed under the full requirements of the permit required confined space program. The space may be reclassified for as long as the hazards remain eliminated.



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- d) Entry Supervisors will certify in writing, that all hazards in the permit required confined space have been eliminated, and will make this document available to each entrant. This certification must contain the date, location of the space, and the signature of the entry supervisor.
- e) If hazards arise in a declassified permit required confined space, employees shall exit, and the entry supervisor shall determine whether to continue declassification of the space.

NOTE: A combination of reclassification procedures and alternate entry procedures (e.g. - using lock out/tag out to eliminate a physical hazard, then continuous forced air to control an atmospheric hazard) may not be used together. Situations as such must be entered under the permit required confined space program.

10.7 Labeling of Confined Space

Portable or fixed Danger signs must be posted at all points of entry to the confined space, which may not be safe for unprotected entry, or where a hazardous atmosphere may accumulate. Signs shall state: *Permit Required Confined Space*.

10.8 Testing Confined Space Atmospheres

- a) Confined space atmospheres must be tested before entry is allowed. Tests shall be conducted in this order: 1) first for oxygen content, 2) second for flammable gases or vapors, and then 3) for toxic vapors or gases.
- b) SSS supervisory personnel shall be trained on the use of, and only use an SSS approved atmosphere monitoring device, that is kept properly calibrated.
- c) In such instances, where entry is required to test the atmosphere, the individual conducting the test shall wear an SCBA (self-contained breathing apparatus) or airline positive pressure respirator with egress bottle. The SSS Respiratory Protection Program shall be followed when using respiratory equipment.
- d) All equipment used for atmospheric testing shall be calibrated and operationally checked prior to use, according to the manufacturer's specifications.



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**10.9 Atmospheric tests and operational checks-
before issuing of a Safe Work Permit:**

- a) Will be done as close as practical to the time the work is to begin, and recorded on the entry permit.
- b) Oxygen content: The percentage of oxygen for unprotected entry into a confined space shall be no less than 19.5 percent, and not greater than 23.5 percent. The oxygen level must be monitored before the flammability test is conducted.
- c) Entry will not be allowed if the LEL is greater than 10 percent.
- d) Entry will not be allowed if measurements of toxic materials exceed the OSHA PEL.
- e) Direct Reading Instruments are the only units approved for confined space entry jobs. Contact your HSE supervisor if you have questions.
- f) Those confined spaces which do not require respiratory protection based on the test results, shall be continuously monitored with an oxygen meter during the performance of work. The area must be evacuated immediately if the oxygen content falls below 19.5 percent by volume, if proper respiratory equipment is not being used. The area must also be evacuated immediately if the oxygen content rises above 23.5 percent by volume.
- g) Continuous monitoring shall also be conducted for toxic gases and combustible gases (LEL) that may be released during the course of work. Continuous monitoring for toxic and combustible gases is mandatory for all confined space work, regardless of the respiratory protection provided. The area must be evacuated if the combustible gases rise above 10 percent LEL. The area must be ventilated to ensure the LEL is below 10 percent, before re-entry is permitted.

10.10 Safety Equipment

To ensure safe entry conditions, the location will provide, maintain, and properly use the following equipment, if required:

- a) Direct reading gas testing equipment for (a) oxygen content, (b) flammable gases and vapors, and (c) potential toxic contaminants.
- b) Any necessary ventilating equipment.
- c) Communications equipment as required.
- d) Any required personal protective equipment, such as self-contained breathing apparatus (SCBA).
- e) Sufficient lighting equipment for both safe work and quick exits.
- f) Barriers and shields necessary to protect workers from external hazards



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- g) Any needed entry or exit equipment, such as ladders.
- h) Adequate rescue and emergency equipment to affect a rescue, and offer immediate first aid or CPR.
- i) Any other equipment necessary for safe entry into and rescue from permit required confined spaces.

10.11 Duties of Authorized Entrants

The supervisor shall ensure that all authorized entrants:

- a) Know the hazards that may be faced during entry, including information on how exposure might occur, signs and symptoms of exposure, and consequences of exposure.
- b) Are properly trained in the tasks and procedures they are required to perform.
- c) Use equipment properly.
- d) Communicate with the attendant as necessary, to monitor the status of the space, and alert them of the need to exit the space.
- e) Alert the attendant whenever an entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or detects a prohibited condition.
- f) Exit from the permit required confined space as quickly as possible whenever: (a) An order is given to evacuate by the attendant or the entry supervisor, (b) The entrant recognizes any warning sign of a dangerous situation or symptom of exposure, and (c) An evacuation alarm is activated.

10.12 Duties of Attendants

The supervisor shall ensure that each attendant:

- a) Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure.
- b) Is aware of possible behavioral effects of hazard exposure to authorized entrants.
- c) Continuously maintains an accurate count of authorized personnel in the permit required confined space.
- d) Remains outside the permit required confined space, until relieved by another attendant.
- e) Communicates with authorized personnel as necessary, to monitor entrant status, and to alert them of the need to evacuate the space.



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- f) Monitors activities inside and outside the space, to determine if it is safe to remain in the space. Orders the authorized entrants to evacuate the permit required confined space immediately, under any of the following conditions: (a) the attendant detects a prohibited condition, (b) the attendant detects any behavioral effects of a hazardous exposure, (c) the attendant detects a situation outside the space that could endanger the entrants, (d) the attendant becomes unable to effectively and safely perform all the duties required of him.
- g) Summons rescue and other emergency services, as soon as the attendant determines that authorized personnel may need assistance to escape from permit required confined space hazards.
- h) Takes the following actions when unauthorized persons approach or enter a permit required confined space, while entry is underway: (a) Warns the unauthorized person to stay away from the permit required confined space, (b) Advises the unauthorized person that they must exit immediately if they have entered the permit required confined space, (c) Informs the authorized entrants and the entry supervisor when unauthorized persons have entered the permit required confined space.
- i) Performs non-entry rescues as specified by the rescue procedure.
- j) Performs no duties that might interfere with the attendant's primary duty, to monitor and protect the authorized entrants.

10.13 Duties of Entry Supervisors

Each entry supervisor shall:

- a) Identify the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure.
- b) Verify that all tests specified by the permit have been conducted, and that all procedures and equipment specified by the permit are in place, before endorsing the permit and allowing entry to begin.
- c) Verify that all persons involved in permit entry are properly trained and competent in their assigned duties.
- d) Verify that rescue services are available, and that the means for summoning them are operable.
- e) Remove unauthorized individuals who enter, or who attempt to enter, the permit required confined space during entry operations.



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- f) Determine when responsibility for a permit required confined space entry operation is transferred, and at intervals dictated by the hazards and operations performed within the space, that entry operations remain consistent with terms of the entry permit, and that acceptable entry conditions are maintained.
- g) Terminate the entry and cancel the permit when the entry operations specified by the permit have been completed, or when a condition not allowed under the entry permit arises, in or near the permit required confined space.

10.14 Rescue requirements

- a) SSS Employees shall not attempt a confined space entry rescue by entering the hazardous area.
- b) SSS Employees shall only attempt a non-entry rescue of a downed worker using a mechanical lifting device and/or a retrieval line.
- c) SSS Employees shall utilize third party services (i.e. - local fire department) that are properly outfitted and trained for emergency confined space rescue, as rescuers of a downed confined space entrant.
- d) Outside rescue services shall be made aware, by the SSS Entry Supervisor, of the hazards that exist in the particular circumstance.
- e) An SSS Safety and Environmental Supervisor shall provide hospitals or treatment facilities with any Material Safety Data Sheets (MSDS), or other information about known hazards in a confined space, if the information can aid in treatment of rescued persons.

10.15 Confined Space Entry Cancellation Procedures

Upon termination of entry and cancellation of the SSS Safe Work permit, the entry supervisor shall ensure that:

- a) Personnel are out of the confined space and accounted for.
- b) Equipment has been removed from the space.
- c) Entry portals are restored to operating condition.
- d) Safety systems are restored to normal service.
- e) The SSS Safe Work permit is removed from the work area.



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10.16 Third Party Contractor Requirements

When SSS arranges to have contractors perform work that involves permit required confined space entry, the supervisor shall:

- a) Inform the contractor that the workplace contains permit required confined spaces, and that permit required confined space entry is allowed only through compliance with a permit required confined space program, meeting or exceeding the requirements the SSS HSE policy.
- b) Inform the contractor of the elements, including the hazards identified and previous experience with the space, that make the space in question a permit required confined space.
- c) Inform the contractor of any precautions or procedures that SSS has implemented for the protection of employees, in or near permit required confined spaces, where contractor personnel will be working.
- d) Obtain any available information regarding permit required confined space hazards and entry operations, from the entry supervisor.
- e) Coordinate entry operations with upstream personnel, when both contractor and upstream personnel will be working, in or near permit required confined spaces.
- f) Inform upstream management of the permit required confined space program, that the contractor will eliminate any hazards confronted, expected or created in permit required confined spaces, either through a debriefing, or during the entry operation.

10.17 Training

Employees must be trained in the relevant aspects of their assigned duties regarding confined spaces when:

- a) First assigned confined space duties.
- b) There is a change in assigned duties.
- c) There is a change in permit required confined space operations that presents a hazard about which an employee has not previously been trained.
- d) The entry supervisor or his designee believes that there are deviations from acceptable entry conditions or that an employee demonstrates a lack of training in the permit required confined space entry procedures.



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The training shall include, as a minimum:

- 1) Proficiency in the specific duties assigned.
- 2) The type of confined space to be entered.
- 3) Chemical or physical hazards involved.
- 4) Work practices and techniques.
- 5) Atmospheric testing procedures.
- 6) Personal protective equipment to be used.

All training shall be documented. The trainer(s) must sign or initial the training record. Records must be readily available for inspection by appropriate personnel.

References

Occupational Safety and Health Administration, **29 CFR 1910.119(j), 1910.146.**
ANSI 2117.1 Safety requirements for working in tanks and other confined space.



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11. Drug and Alcohol Policy

11.1 Introduction

Triple S Trucking recognizes that drug and alcohol abuse in the work place threatens the safety of our Employees, and all persons who come onto our work location.

11.2 Scope

The SSS Drug and Alcohol Policy applies to all SSS Employees, in addition to all SSS employment applicants.

11.3 Purpose

SSS is committed to providing a safe work environment, and to fostering the well being and health of its Employees. That commitment to a safe work environment is jeopardized when any applicant or any SSS Employee uses illegal drugs or alcohol on the job, comes to work with these substances present in his or her body, or possesses drugs in the workplace. SSS has established the following policy concerning alcohol and other drugs, to ensure that we can meet our obligations to the safety of our Employees, our customers, and the public. The goal of this policy is to maintain a safe, productive, and drug-free environment.

11.4 Required Forms

- 1) SSS Employee Consent to Drug and Alcohol Screen Form
- 2) Authorization for a Drug Screen Form

11.5 Condition of employment

- a) Potential Employees shall submit to and pass an observed pre-employment drug screen at an approved SSS drug testing facility.
- b) As a condition of continued employment, SSS Employees shall remain drug and alcohol free at all times, while performing duties for SSS and SSS customers.
- c) No applicant or current Employee who tests positive for illegal substances or alcohol shall be allowed to subsequently work for SSS, without verifying satisfactory completion of a recognized and approved Substance Abuse Counseling Program.



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- d) No applicant or current Employee who tests positive for illegal substances and/or alcohol shall be allowed to work for SSS, nor shall any applicant or current Employee who tests positive for illegal substances and/or alcohol be allowed to enter onto or work on SSS work locations, equipment, machinery or property; or enter onto or work on any of SSS customers' work locations, equipment, machinery or property.
- e) No new applicant is eligible for employment until that applicant has been drug tested at SSS' expense.
- f) Each SSS Employee is subject to a drug test at any time on a random and regular basis. Refusal to submit to a drug screen shall be deemed as a positive test.
- g) SSS Employees taking any medication that may cause impairment of normal mental or physical function (e.g. - cold medication, prescription drugs) shall notify their supervisor before performing job duties.
- h) All drug test results shall be reported to an authorized SSS company representative. SSS shall maintain the highest standards of confidentiality for all records and information concerning drug and alcohol testing. ***"ALL TESTS SHALL BE KEPT STRICTLY CONFIDENTIAL."***

11.6 Drug test standards and confirmation

NOTE: All testing of drivers of commercial motor vehicles shall be conducted in strict compliance with Federal Motor Carriers' Safety Regulations. In the event of a conflict with SSS Policy, the Federal regulations shall hold precedence over SSS policy.

- a) The urinalysis drug test will be conducted at an SSS approved drug testing facility, which employs a National Institute of Drug Abuse (NIDA) approved standard test, or an "urinalysis rapid drug test kit". A laboratory technician or an authorized representative shall witness and perform all drug tests.
- b) Drug tests with positive results utilizing a local laboratory shall be confirmed by an independent lab. Any positive drug test result utilizing the "urinalysis rapid drug test kit" shall be further tested by an independent lab, utilizing a gas chromatography/mass spectrometry (GC/MS) method to reconfirm the results.
- c) Any SSS Employee who tests positive for illegal drugs utilizing the "rapid drug test" shall be suspended, without pay, from all work



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activities, until the drug test is confirmed by an independent lab. If the “rapid drug screen” denotes a “false” positive as confirmed by an independent lab, then that SSS Employee shall be eligible for immediate return to work status.

- d) A positive drug screen shall be considered “absolute” positive, after it has been tested and confirmed by two independent sources.

11.7 Positive drug test results

- a) An “absolute” positive drug test, that detects an illegal drug or drugs, shall result in an SSS applicant not being eligible for SSS employment. Any “absolute” positive drug test conducted on a current SSS Employee, that detects an illegal drug or drugs, shall result in immediate termination.
- b) Any SSS applicant or employee who tests positive for illegal drugs shall not be eligible for re-application for a minimum of one hundred and eighty (180) days, upon the first confirmed positive test.
- c) Any SSS applicant or employee who tests positive for illegal drugs as a second, or repeat violation, shall not be eligible for re-application for a minimum of three (3) years.
- d) After disqualification of an applicant or termination of an employee for a positive test, the former SSS applicant or former SSS Employee shall be subject to another drug test after the restricted period listed previously. The cost for this subsequent drug test shall be at the former SSS applicant or former SSS Employee’s expense.
- e) At no point or time is an SSS Employee with a positive drug test allowed to enter any SSS customer’s premises.
- f) SSS shall ensure all SSS personnel who enter SSS customer’s premises will be in compliance with this drug test policy.

11.8 Alcohol

- a) As a condition of employment all new applicants and current Employees will be tested for alcohol, by an SSS approved alcohol testing facility, prior to entering or working on SSS locations, equipment, machinery or property, and entering or working on any of SSS customer’s locations, equipment, machinery or property.
- b) A Blood Alcohol Level meeting or exceeding .04 percent shall be deemed a positive test.



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- c) The results of the alcohol test shall be known and disclosed to specifically authorized SSS representatives, prior to any new applicant or current Employee entering or working on SSS work locations, equipment, machinery or property; and entering or working on any of SSS customer's work locations, equipment, machinery or property.
- d) No applicant or current Employee who tests positive for alcohol during work shift, shall be allowed to work for SSS, nor shall they be allowed to enter onto or work on SSS work locations, equipment, machinery or property; or enter onto or work on any of SSS customer's work locations, equipment, machinery or property.
- e) Each SSS Employee is subject to an alcohol test at any time on a random and regular basis. Refusal to submit to an alcohol test shall be deemed as a non-negative test.
- f) All alcohol test results shall be reported to an authorized company representative. The company shall maintain the highest standards of confidentiality for all records and information concerning drug and alcohol testing. ***"ALL TESTS SHALL BE KEPT STRICTLY CONFIDENTIAL."***

11.9 Blood alcohol test standards and confirmation

The alcohol breathalyzer and/or blood test will be conducted by an SSS approved testing facility. A laboratory technician or an authorized representative shall witness and perform all alcohol tests.

11.10 Positive blood alcohol test results

- a) Any positive blood alcohol test, meeting or exceeding .04 percent, shall result in an SSS applicant not being eligible for SSS employment.
- b) Any positive blood alcohol test, meeting or exceeding .04 percent, conducted on a current SSS Employee, shall result in immediate termination.
- c) Any SSS applicant or employee, who tests positive, meeting or exceeding .04 percent, shall not be eligible for re-application for a minimum of one hundred and eighty (180) days upon the first confirmed non-negative test.
- d) Any subsequent testing of an SSS applicant or employee, who tests positive, meeting or exceeding .04 percent, shall not be eligible for re-application for a minimum of three (3) years.
- e) After disqualification of an applicant or a terminated employee for a positive test, the former SSS applicant or former SSS Employee shall be subject to another blood alcohol level test after the restricted period



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listed previously. The cost for this subsequent test shall be at the former SSS applicant or former SSS Employee's expense.

- f) At no point or time is an SSS Employee with a positive blood alcohol test, meeting or exceeding .04 percent, allowed to enter any SSS customer's premises.
- g) DOT drug and alcohol testing requirements will be met for SSS Employees when the Employee is performing DOT Regulated activities.

11.11 Cause for Testing

SSS shall require, but not limit, drug and alcohol testing for the following conditions:

- 1) Pre-employment,
- 2) Random testing,
- 3) Periodic testing,
- 4) Reasonable suspicions,
- 5) Post-accident (all SSS personnel involved with the accident),
- 6) Annual testing, and
- 7) Return to work testing after termination.

11.12 Searches & Seizures

- a) Unless prohibited by applicable law, without prior announcement, and at any time, SSS may carry out reasonable searches of individuals and their personal effects, when entering SSS premises, while on SSS premises, when leaving SSS premises, engaging in SSS business, and/or operating SSS equipment.
- b) Entry onto SSS premises, or the performance of SSS business or the operation of SSS equipment, constitutes consent to a search of the person and his/her personal effects, including, without limitation, clothing, packages, briefcases, purses, lunch boxes, vehicles, offices, lockers, tool boxes and desks.
- c) Any Employee who is asked to become the subject of a search can refuse the search. Refusal to submit to a search will result in immediate termination.
- d) Any suspected illegal drug, drug paraphernalia, or alcohol obtained as a result of these searches, is subject to confiscation, and will be turned over to the appropriate law enforcement agency.



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12. Emergency Action Plan Policy

12.1 Introduction

The SSS Emergency Action Plan Policy seeks to provide for the health, safety and well being of SSS Employees by providing education in emergency guidelines. Education is needed to ensure all SSS Employees have knowledge and understanding of methods for escape, and emergency notification requirements in cases of emergencies.

12.2 Scope

The SSS Emergency Action Plan Policy applies to all SSS Employees.

12.3 Purpose

The SSS Emergency Action Plan is designed to facilitate methods for escape, and emergency notification requirements in cases of an emergency. It shall be covered during New Employee Orientation, during annual refresher, and if the plan is changed.

12.4 Required Forms

- None

12.5 Emergency Contact Numbers

Triple S Field Office (24 hours/7 days a week).....	505-334-6193
Triple S Safety and Environmental Supervisor.....	505-334-6191
Durango Hospital.....	970-247-4311
Hazardous Materials Hotline.....	800-424-9300
Medical and Fire Emergencies.....	911
Poison Control Hotline.....	800-432-6866
San Juan County Regional Emergency Room.....	505-599-6100
SJCRMC (Main Switchboard).....	505-325-5011
San Juan County Non Emergency Dispatch.....	505-334-6622

12.6 Policy

- a) SSS Employees shall familiarize themselves with emergency procedures and emergency phone number locations. Your direct supervisor may be contacted if you need an explanation of your duties.



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- b) SSS Employees shall familiarize themselves with all escape exits, and the location of any shutoff valves and switches.
- c) SSS Employees shall ensure all exits are kept clear for easy exit.
- d) SSS Employees in remote locations are encouraged to call 911 to determine emergency personnel response capabilities, and to identify the emergency call center to which they have been routed

12.7 SSS Service Facility

12.7.1 Notification

- a) The SSS Service Facility emergency notification call number is 799 from any SSS Service Facility Telephone. This allows the telephone system to work as an intercom, to notify employees in an emergency.
- b) All emergencies shall be immediately reported by calling 911. Management personnel shall be immediately notified of all emergencies.
- c) Employees notifying emergency personnel of an emergency shall adhere to all emergency call policies.

12.7.2 Evacuation

- a) If a medical or safety emergency exists or occurs in the SSS Rig-Up Service Facility, all Employees shall exit out of the nearest exit. Exits are located on the south (front door) and on the west end (drivers' room) of the building. SSS Rig-Up Shop exits are located on the south and east sides of the building, as well as 3 large shop doors on the south side of the building).
- b) If a medical or safety emergency exists or occurs in the SSS Water Service Facility, all Employees shall exit out of the nearest exit. Exits are located: 1) three exits and four large shop doors on the South side, and 2) three exits on the North side and one exit on the West side.
- c) If a medical or safety emergency exists or occurs in the SSS Water Service Shop, all Employees shall exit out of the nearest exit. Exits are located on each side of the Service shop, one exit on the north side, as well as 3 large shop doors on the east side.
- d) If an evacuation is required, SSS employees shall determine if all personnel and visitors are present and accounted for, by name. No employees may remain during an evacuation. Employees are not allowed to perform rescue duties- only outside services shall be allowed to perform this task.



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- e) If a medical or safety emergency exists or occurs in either SSS Service Facility, all SSS Employees shall make every effort to meet at the designated meeting area, and determine if all SSS Employees are present and accounted for.
- f) Any injuries resulting from a medical or safety emergency shall be assessed at the front gate, and appropriate medical attention shall be determined and provided.

12.8 Remote Work Locations

- a) All emergencies shall be immediately reported by calling the SSS Field Office. If there is no response at the Field Office, SSS Employees shall then call 911, or appropriate emergency personnel listed previously.
- b) If a medical or safety emergency exists or occurs, on or near a SSS remote work location, SSS Employees shall make every effort to meet at the work location's entrance, unless the entrance is near equipment that might also be involved in the emergency. In cases where the entrance is near equipment could be involved in the emergency or cannot be accessed without hazard, an alternative rally point shall be identified on the JHA.
- c) Each work area must designate and train employees to assist in a safe and orderly evacuation of other employees.
- d) SSS Employees shall make every effort to ensure all SSS Employees are present and accounted for, by name. No employees may remain during an evacuation. Employees are not allowed to perform rescue duties- only outside services shall be allowed to perform this task.
- e) Any injuries resulting from a medical or safety emergency shall be assessed, and appropriate medical attention shall be determined and provided.

12.9 Emergency calls

- a) **SSS Employees answering an emergency call shall:**
 - 1) Establish the exact location where the emergency is taking place,
 - 2) Determine the type of emergency,
 - 3) Get directions to the emergency location,
 - 4) Determine whether or not SSS personnel are able to meet emergency personnel at a main road,
 - 5) Determine whether or not a helicopter can land nearby,
 - 6) Get the phone number of the person calling.



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- b) SSS Employees answering an emergency call shall call 911 at once, upon determination of need.
- c) SSS Employees answering an emergency call shall attempt to keep in constant contact with the emergency caller, and shall seek to determine appropriate medical information about the injured person.
- d) SSS Employees making an emergency call shall provide:**
 - 1) The exact location where the emergency is taking place,
 - 2) The type of emergency,
 - 3) Directions to the emergency location,
 - 4) Whether or not SSS personnel are able to meet emergency personnel at a main road,
 - 5) Whether or not a helicopter can land nearby,
 - 6) The phone number of the phone from which they are making the call.
- e) SSS Employees making emergency calls from remote work locations shall make every effort to provide the exact location of an emergency by utilizing latitude and longitude, and driving directions, along with prominent area landmarks.



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13. Electrical Policy

13.1 Introduction

The SSS Electrical Policy contains basic electrical service guidelines, Employee classifications (identifying an Employee's ability to work with electrical equipment), PPE requirements, general electrical safety precautions, SSS electrical equipment standards, and location classifications. These policy sections guide an Employee in the safe handling of electricity, but should not be considered to be all-inclusive.

13.2 Scope

The SSS Electrical Policy applies to any employee on or near SSS property and/or equipment. Note that requirements for energy-isolation during equipment maintenance and service are located in the SSS LO/TO Policy.

13.3 Purpose

The SSS Electrical Policy is designed to ensure that electrical equipment meets applicable classifications for a specific area, is in a safe working condition, and that electrical safety guidelines are followed to ensure the safety of SSS Employees.

13.4 Required Forms

Authorization to perform electrical work must be provided by the Supervisor on the LO/TO Energy Control Form, in conjunction with required LO/TO shutdown guidelines, as specified in the SSS LO/TO Policy and associated documents.

13.5 General electrical safety precautions

SSS Employees shall be knowledgeable and have understanding of the basic electrical principle, that all electrical current is dangerous, and this knowledge is an SSS Employee's first line of defense to avoid electrical hazards.

- a) No SSS Employees shall perform electrical repair work and or installation of permanent electrical equipment.
- b) No SSS Employee will attempt to tape or splice defective electrical wiring.
- c) SSS Employees will refer all electrical work to a qualified electrician.



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- d) SSS Employees shall obey electrical equipment warnings, including those on posted barriers and signs.
- e) No SSS Employee shall ever handle electrical equipment with wet hands or gloves, or in a wet environment including, but not limited to: wash water, dew, rain, sleet, or snow.
- f) Water and other cleaning agents shall never be used by SSS Employees near any electric devices.
- g) No SSS Employee shall ever handle or use a metal ladder around live electricity.
- h) SSS Employees shall be aware of overhead power lines and other overhead electrical power sources. No part of a crane, boom, mast, gin pole, or other machinery and equipment shall be permitted within ten (10) feet of a power line rated fifty (50) kV or below. For energy lines rated above 50 kV, the minimum distance between power lines and SSS equipment shall be 10 feet plus one-half (1/2) inch for each kV over 50 kV.
- i) Any SSS equipment subject to electrical short circuits, static charge buildup, or lighting (e.g. - generators, pumps, and fuel tanks) shall always be grounded.
- j) SSS Employees shall elevate all electrical lines in vehicle travel areas and foot travel areas.

13.6 Definitions

- a) “Qualified Employee” means an individual familiar with the construction and operation of the equipment and hazards involved. Whether an Employee is considered to be a “qualified person” will depend upon various circumstances in the workplace. It is possible and, in fact, likely for an individual to be considered qualified with regard to certain equipment in the workplace, but “unqualified” as to other equipment. (See 29 CFR 1910.332(b) (3) for training requirements that specifically applies to qualified persons.) SSS Employees shall visually inspect electrical equipment before use, reporting any defects with the wiring or equipment immediately to their supervisor.
- b) SSS Personnel shall not handle energized electrical lines or wiring.
- c) SSS Water Employees shall ensure vehicles are properly and adequately grounded, during loading or unloading operations.



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13.7 Precautions for Use of Portable Electric Tools and Lights, Hand Tools

- a) SSS Employees shall maintain electrical equipment properly: 1) before using electrical equipment, inspect it for proper insulation and grounding and tight electrical connections, and 2) use double-insulated hand tools and/or a ground fault circuit interrupter (GFCI).
- b) SSS Employees shall read and follow the manufacturer's instructions for each piece of electrical equipment.
- c) SSS Employees shall ensure electrical plugs match their receptacles; never alter a plug.
- d) SSS Employees shall not carry or lift portable electrical tools by the power cord.
- e) SSS Employees shall not handle electrical equipment with wet hands, or in a wet environment.
- f) SSS Employees shall not use a piece of electrical equipment with a damaged power cord.
- g) SSS Employees shall not use a piece of electrical equipment that sparks, smokes, smells, or gives any indication of shock. Report all defective electrical equipment to your Supervisor.
- h) SSS Employees shall not use portable electrical tools around flammable liquids, vapors or dust.
- i) Guarding provided on power tools must be kept intact and in working order.
- j) Hand or power tools producing hazards, such as particles or dust/fumes, shall be provided and must use proper PPE to protect from the produced hazards.
- k) Hand tools shall always be inspected prior to use, and must be maintained in a safe condition.
- l) Power or hand tools that are found to be unsafe, must be tagged **Out of Service**, then either properly repaired or destroyed. SSS will not allow employees to use equipment which has been tagged Out of Service.



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13.8 Extension cord safety precautions

- a) SSS Employees shall inspect portable equipment, including extension cords, before each use; label and turn in defective or damaged equipment to be repaired or replaced.
- b) SSS Employees shall not substitute extension cords for the fixed wire of a structure, or run them through doorways, windows, or similar openings. Do not attach extension cords to building structures, or conceal them behind building walls, ceilings or floors.
- c) SSS Employees shall not leave cords tangled or lying across an area where people walk.
- d) SSS Employees shall not fasten electrical cords with staples.
- e) SSS Employees shall ensure that all extension cords are rated and tagged for industrial use.
- f) Electrical cords that are found to be unsafe, must be tagged ***Out of Service***, then either properly repaired or destroyed. AWS will not allow employees to use equipment which has been tagged Out of Service.

13.9 Emergency Situations

- a) In the event that someone becomes shocked by live electrical current, the SSS rescuer shall always de-energize the power source, prior to attempting a rescue.
- b) In the event a power source cannot be secured after someone becomes shocked by live electrical current, the SSS rescuer shall attempt to pull the victim away from the live conductor with a non-conductive material (e.g. - broom stick or dry rope).
- c) First aid for a person shocked by live electrical current shall be done by an SSS Employee (or other person) qualified in First Aid/CPR procedures. Emergency services shall be notified immediately.



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14. Employment Policies and Practices

14.1 Introduction

This Statement of Employment Policies and Practices is not intended to be an all inclusive list of employment policies and procedures of the Employer, however, it is a guide to help answer the most commonly asked questions, and sets forth the guidelines under which the Employer operates. The Employer reserves the right to unilaterally change, modify, suspend, interpret, cancel, delete, or amend any statement made in the Statement of Employment Policies and Practices, at any time, and without notice.

14.2 Scope

The SSS Employment Policies and Practices Policy applies to all SSS Employees

14.3 Purpose

The SSS Employment Policies and Practices Policy is designed to promote the safe and efficient operation of SSS business, and to ensure the security and well being of all Employees. This Policy establishes certain expectations and standards for performance and behavior that exist for all SSS Employees.

14.4 Required Forms

- Employment Policies Acknowledgement of Receipt Form

14.5 Definitions and introduction

- a) The terms "Employee" and "Employees," as used in this Statement of Employment Policies and Practices refer to the regular (non-temporary) Employees of Triple S Trucking Company, Inc. The term "Employer" refers to Triple S Trucking Company, Inc.
- b) Employment with the Employer is voluntary and "at will." This means that either the Employee or the Employer may terminate the employment relationship at any time and for any reason. Nothing contained in this Statement of Employment Policies and Practices creates or constitutes a contract of employment.



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- c) No Employee and/or representative of the Employer is authorized to create a contract of employment with any Employee, except in a formal written contract of employment, authorized and signed by a designated corporate officer. Any Employee must report any instances of unauthorized promises or representations to the contrary, to Jerry Sandel or Stewart Peterson.
- d) This Statement of Employment Policies and Practices is not intended to be an all inclusive list of policies and procedures of the Employer, however, it is a guide to help answer the most commonly asked questions and sets forth the guidelines under which the Employer operates. The Employer reserves the right to unilaterally change, modify, suspend, interpret, cancel, delete, or amend any statement made in the Statement of Employment Policies and Practices, any time, and without notice.

14.6 Equal employment opportunity

- a) It is the Employee's ability, attitude, and performance, which are the major criteria for success with the Employer, regardless of race, religion, color, sex, age, national origin, ancestry, pregnancy, disability, or any other characteristic protected by law. The Employer abides by the equal opportunity laws in all aspects of employment.
- b) If any Employee has a question or concern about discrimination in the workplace, he or she is encouraged to bring it to the attention of his or her Supervisor(s), Jerry Sandel, Jason Sandel or Stewart Peterson. Employees can raise concerns and make reports without fear of reprisal. Any Employee found engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

14.7 Harassment

- a) The Employer expects all Employees to work in a manner that respects the feelings of their co-workers. It is the policy of the Employer that all Employees have the right to work in an environment free from harassment based upon race, religion, color, sex, age, national origin, ancestry, pregnancy, disability, or any other characteristic protected by law. Any harassment of Employees by their co-workers, Supervisors, or third parties will not be tolerated.



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- b) Unlawful harassment can include physical contact or verbal abuse or kidding which is directed at another individual, because of that individual's race, religion, color, sex, age, national origin, ancestry, pregnancy, disability, or any other characteristic protected by law and which is considered unacceptable or unwelcome by another individual. This may include comments and compliments that extend beyond mere courtesy, offensive visual material, inappropriate gestures, hostile behavior, jokes that are clearly unwanted or considered offensive, and other comments, innuendo, or action that offends others.
- c) Impermissible sexual harassment includes (1) sexual advances and other verbal or physical conduct where submission to the conduct is made a term or condition of employment, or is used as the basis for employment decisions, and (2) unwelcome verbal or physical conduct of a sexual nature that unreasonably interferes with an Employee's work, or creates a hostile or abusive work environment.
- d) An Employee, who believes that he or she is being harassed in violation of this policy, witnesses' harassment in violation of this policy, or has any grievance or complaint against any Employee or Supervisor, should bring the matter to the attention of his or her Supervisor(s). There will be no retaliation by the Employer for bringing a harassment complaint.
- e) Employees who engage in any form of harassment face serious consequences, up to and including termination of employment.

14.8 Open door policy

The Employer encourages Employees to submit verbal or written complaints or grievances to Management. The Employer encourages the Employee to first bring the complaint or grievance to the Employee's direct Supervisor. If the Supervisor is the subject of the complaint or grievance or the Employee is uncomfortable with bringing the complaint or grievance to his or her Supervisor, then the Employee should bring it to Stewart Peterson or Jerry Sandel. The Employer's intent is to treat the Employees fairly, and will address each complaint or grievance on a case-by-case basis.

14.9 Termination of employment

- a) The employment relationship typically terminates by resignation, discharge, layoff, or retirement. Since employment with the Employer is based on mutual consent, both the Employee and the Employer have the right to terminate employment at will, with or without cause, any



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time. Employees will receive their final pay within five working days of the separation. Any unpaid advances or loans to an Employee will be subtracted from the Employee's final paycheck. The Employee remains personally liable for any unpaid advances or loans after leaving their employment with Employer.

- b) Employees may be involuntarily discharged for dishonesty, insubordination, refusing to perform job, failing to keep confidentiality information confidential, failure to meet deadlines, failure to cooperate with co-workers and Supervisors, absenteeism, tardiness, discrimination against others, harassment of others, criminal activity, being under the influence of alcohol or a controlled substance while on duty, theft or unauthorized use of company property, and for any reason that causes the Employer to lose faith in the Employee's ability to acceptably perform his or her job duties, or is deemed in the discretion of the Employer to warrant termination. This list is intended as an example only, and is not intended to indicate all those acts that could lead to Employee discipline or termination.
- c) There is no formal review or hearing process with regard to terminations. Any terminated Employee may contact Jerry Sandel, Jason Sandel or Stewart Peterson to discuss the basis for their termination.

14.10 Sick, vacation and personal leave

14.10.1 Office/Clerical/Management Employees

- a) Office, clerical, and Management Employees are allowed two sick days per calendar year. If not taken, the Employee will be paid for the unused time in the first pay period of the following year.
- b) Office, clerical, and Management Employees are allowed one week of paid vacation per year after the first year of employment, two weeks of paid vacation per year after the second year of employment, and three weeks of paid vacation per year after three or more years of employment. As there is no payout for unused vacation time, Employees are encouraged to plan accordingly, to make use of their allowed days off.
- c) Office, clerical, and Management Employees are allowed to take reasonable time off for doctor's appointments and emergencies. This time off should be pre-arranged with the Employee's Supervisor when possible. Time off will be docked if an Employee claims overtime during that pay period.



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- d) Office, clerical, and Management Employees may arrange to use a company van for vacation purposes if a van is available for use. If there is a conflict, the vans will be made available to Employees on the basis of seniority. Employees may use company gasoline cards while using the vans for vacation. Any purchases with the company gasoline cards will be added to the Employee's earnings at the end of the calendar year.

14.10.2 Hourly Employees

- Hourly Employees are allowed 40 hours of paid leave per year, after the first year of employment, 80 hours of paid leave per year after the third year of employment, and 120 hours of paid leave per year after seven or more years of employment.

14.10.3 Monthly Employees

- a) Monthly Employees are allowed two weeks of paid vacation per year after the first year of employment, and three weeks of paid vacation per year after three or more years of employment.
- b) Monthly Employees may arrange to use a company van for vacation purposes if a van is available for use. If there is a conflict, the vans will be made available to Employees on the basis of seniority. Employees may use company gasoline cards while using the vans for vacation and any purchases with the company gasoline cards will be added to the Employee's earnings at the end of the calendar year.

14.11 *Medical leave*

Under the federal Family Medical Leave Act, if employed by a company with more than fifty Employees, eligible Employees (as defined under the Act) are allowed to take unpaid leave, or paid leave if earned, for a period of up to twelve work weeks, in any twelve month period, in the event of the birth of a child or the placement of a child for adoption or foster care; because the Employee is needed to care for a family member (child, spouse or parent) with a serious health condition; or because an Employee's own serious health condition makes them unable to do their job.



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14.12 Benefits

The eligibility for benefits is dependent on a variety of factors, including Employee classification. An Employee's Supervisor can identify the programs for which he or she is eligible. All statements regarding coverage are subject to the terms, conditions, restrictions, and other eligibility requirements set forth in the plan document, which is the final word in terms of eligibility for coverage. Employer reserves the right to modify, amend, or terminate any benefit plan at any time, and for any reason.

14.13 Computer use

Those Employees who have access to and use the Employer's computers may not use the Internet for anything other than Employer business, unless express approval is received from a Supervisor for special projects. Under no circumstances may the Employer's computers be used to view pornography. Any Employee found viewing pornography or sexually explicit material on the Employer's computers is subject to automatic termination. Any Employee, who witnesses another Employee viewing pornography or sexually explicit material, should immediately report it to Jerry Sandel.

SSS may at any time, by discretion of Senior Management, monitor all communications of SSS employees including telephone, fax, email, and standard mail, routed through SSS facilities.



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14.14 Lone Worker Policy

Every worker should understand the Lone Worker Policy, to include provisions for checking in after returning from the field. Lone workers/remote crews must know, and have the capability (radios or telephones), to contact company personnel in case of emergencies. All Heavy Haul and Water trucks are equipped with GPS tracking equipment.

The guidelines given to all new employees of the Aztec Family of Companies during orientation are:

Rig Up:

1. Heavy Haul crews (a driver and a swamper) generally travel in groups of two or more trucks. Generally, a Truck Manager accompanies groups of trucks.
2. If individual crews are sent on a late move, the driver is required to call the Truck Manager on their return to the yard.
3. All Heavy Haul, Transportation Safety Personnel, and Truck Manager's vehicles are equipped with CB radios.
4. All crews must contact the Dispatcher at the end of their day, when they return to the yard.

Water:

1. Water Department drivers must contact their assigned Truck Manager, upon their return to the yard after their final trip of the work day. Contact may be in person or by telephone.
2. Gaugers are to report in to Dispatch/Office, the Asst. Manager, or the General Manager when they return to the yard.
3. Water Department, Transportation Safety Personnel, and Truck Manager's vehicles are equipped with company radios.
4. Company radio dispatch is manned 0630 through 1730 hours, Monday through Friday.
5. After hours and weekends are manned by a contract dispatch service.

If an employee fails to check/call in as required, the Dispatcher/Truck Manager shall immediately take action to locate the missing person.



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15. Fall Protection Policy

15.1 Introduction

Fall hazards exist in everyday SSS operations including, but not limited to, working on equipment, ladders and mechanical lifting devices. The SSS Fall Protection Policy identifies the minimum criteria for preventing and minimizing fall hazards and injuries.

15.2 Scope

Any SSS Employee, SSS customer's Employee and third party contractor's Employees must follow the SSS Fall Protection Policy when working six (6) feet or more above the adjacent level.

15.3 Purpose

The SSS Fall Protection Policy exists to ensure that SSS Employees and other associated workers, in and around SSS equipment, are one-hundred percent (100%) protected against any potentially dangerous falls 100% of the time (i.e. - 100% fall protection). 100% fall protection means continuous protection from exposure to a fall of 6 feet or greater.

15.4 Required Forms

- None

15.5 Authorized fall protection equipment

- a) An SSS Safety and Environmental Supervisor shall ensure all harnesses and lanyards meet the ANSI standard for Class 1 work belts/harnesses.
- b) A full body harness shall be acquired through the SSS Safety Department and shall be properly sized. Harnesses shall have a waist belt, D-ring in the center of the back, and D-ring at the middle of the shoulders on the back.
- c) Lanyards shall be acquired through the SSS Safety Department and shall be equipped with a breakaway portion. The breakaway requirement is not applied if the lanyard is used for SSS Employee positioning only.



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- d) Tie off straps (two, three and/or four feet) shall only be used to provide a suitable tie off point, where a more suitable tie off point is otherwise not available.
- e) Retractable lanyards (10 or 11 feet) shall be used to provide a simple method for keeping tied off 100% of the time.
- f) The fall arrest block shall be used as a method to arrest a fall while an SSS Employee is performing operations that require working at heights.

15.6 Fall arrest protection system

- a) All SSS Employees working more than six (6) feet above the adjacent level, and/or six (6) feet above any work floor, shall wear an SSS safety department approved full-body harness at all times, and the harness shall be tied off with an ANSI approved lanyard and a separate fall-arrest device. This requirement does not apply to standard height work platforms equipped with standard handrails and toe boards, or ladders constructed with cages and properly spaced landings.
- b) SSS Employees shall attach lanyards used for fall protection in a way that the SSS Employee's fall will be no greater than six (6) feet. SSS Employees shall not attach lanyards lower than their waist. SSS recommends attaching lanyards head high or higher, whenever possible.
- c) SSS Employees shall ensure anchorage attachment points for lanyards are supported independently from where the Employee is working, and that the anchorage attachment points are capable of supporting at least five-thousand (5,000) pounds.
- d) SSS Employees shall not wrap a lanyard around a beam or a pipe and hook it back on itself, unless the lanyard is specifically designed to do so by the manufacturer. SSS Employees shall utilize a purpose-built beam strap or anchoring device with properly sized D-rings as an anchor point, instead of wrapping the lanyard around the beam and securing it to itself.



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15.7 Fall arrest equipment handling

- a) SSS Employees shall inspect fall protection equipment prior to each use, i.e. – harness, lanyard, SRLs, etc. Documented inspection shall take place once a month.
- b) SSS Employees shall not alter any fall protection equipment from its manufactured or manufacturer reconditioned configuration. Labels shall never be removed from any harnesses or lanyards for the life of the equipment.
- c) SSS Employees shall clean safety harnesses, lines, and lanyards regularly, in accordance with the manufacturer's recommendations. SSS Employees shall clean safety harnesses, lines and lanyards by: 1) washing only with mild detergent and warm water, 2) toweling off to remove excess water, 3) hanging harnesses up by the D-ring and lanyards up by the hook to dry. SSS Employees shall never place safety harnesses, lines, and lanyards in a dryer, or expose them to excessive heat.
- d) If any part of the equipment is damaged, or if it is subjected to a fall arrest shock, SSS Employees shall remove the equipment from service, and replace it with new or manufacturer reconditioned equipment.
- e) SSS Employees shall use extra care when using lanyards and harnesses near sharp edges and/or abrasive surfaces.
- f) SSS Employees shall not allow lanyards to rest on hot surfaces.
- g) SSS Employees shall not tie knots in a lanyard to make it shorter.
- h) Some chemicals may cause deterioration to the fall protection equipment. SSS Employees shall contact a SSS Safety and Environmental Supervisor if there is any doubt about the effect of a particular chemical on any harness or lanyard. Upon being contacted by a SSS Employee regarding potential chemical deterioration of fall protection equipment, a SSS Safety and Environmental Supervisor shall contact the manufacturer to ascertain specific instructions.
- i) SSS Employees shall never hook two or more lanyards together to increase length.
- j) SSS Employees shall always destroy any harness or lanyard that was subject to a shock load imposed by a fall.
- k) SSS Employees shall never use nylon lanyards around welding operations; specially designed lanyards are required for this type of operation.
- l) SSS Employees shall never use any hook device other than a self-locking (or double locking) snap-hook with any fall protection equipment.



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16. Behavior Safety Observation Policy

16.1 Introduction

The SSS Behavior Safety Observation Policy is a process that begins with human behavior. This policy is not about managing numbers, it is about managing behaviors that affect safety performance. Behavior safety observations are interventions that are designed to influence the behavior of all SSS Employees before accidents happen. These observations are captured and turned in on the *Field Observation Card*, which is also used to report a Near Miss.

16.2 Scope

The Behavior Safety Observation Policy applies to all SSS Employees who engage in hazardous or potentially hazardous work activities.

16.3 Purpose

The SSS Behavior Safety Observation Policy is a method of improving SSS Employees' health and safety, and protecting the environment at all work sites, by encouraging SSS Employees to be observant of their colleagues' activities.

16.4 Required Forms

- The *Field Observation Card*

16.5 Policy

- a) SSS Employees shall assist colleagues by "Always Watching-out for Safety". Upon observing a positive or negative work activity the observing SSS Employee shall stop the individual conducting the activity at an appropriate time (only stop an individual when safety permits) to discuss the observed behavior.
- b) Behavior safety observations shall be conducted utilizing SSS Employee(s), identified as auditors. In most cases auditors shall observe predetermined and specifically identified work activities.
- c) SSS Employee(s) conducting safety observations shall observe people working, use all senses, utilize the specified checklist, and create a specific agenda.



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- d) AWS Employee(s) conducting safety observations shall stop (only stop the individual(s) when safety permits) the person(s) conducting the observed activity, upon observing a positive or negative work activity that needs to be discussed. Feedback discussions between auditor(s) and the observed shall initially be in question form, and follow-up shall be specific as to potential injury cause and severity, preventive measures, or appropriateness of specific behavior. In cases of negative observations, agreements should be made between the auditors and the observed to determine a specific harm reduction resolution.
- e) Feedback to the observed shall include:
 - Review the observation with observed employee
 - Start with a positive comments
 - Reinforce safe behaviors observed first
 - Describe and discuss what was unsafe
 - Solicit from observed employee explanation of his/her unsafe behavior with open-ended questions
 - Re-emphasize no consequence to observed employee.
- f) AWS Employee(s) conducting safety observations and the person(s) observed, shall debrief after any discussions to highlight any lessons learned, agree to follow-up actions, mutually coach, and for the observed to review the auditor(s') performance.
- g) AWS Employee(s) conducting safety observations shall ensure adequate and appropriate records are kept regarding the formal safety observation. Auditor(s) shall only record their own names (not the person being observed) and the critical information (in most cases just the debriefing information).
- h) Safety observation records shall be provided to the Supervisor and shall be utilized to identify areas where program improvements are needed.
- i) All Field Observation cards shall be entered into a tracking database, to identify trends, and areas needing attention. The results shall be reviewed on a monthly basis, with corrective actions determined for the relevant managers.



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- j) Once trend analysis is complete, appropriate action plans must be developed to address unsafe behaviors. Action planning will include:
 - 1) Evaluate unsafe behaviors from trend analysis and prioritize
 - 2) Develop action plan for unsafe behaviors based on comments and feedback from data sheets
 - 3) Designate responsible parties and timeframes within the action plan
 - 4) Define who is responsible for action planning
 - 5) Ensure management support
- k) Action plans will be reviewed quarterly for completion by the relevant managers, results being kept in the database.
- l) AWS Employee(s) conducting safety observations shall conduct follow-up observations to check on agreements.
- m) AWS Employee(s) conducting safety observations shall never be confrontational.
- n) Training on the Observation Process will be covered during New Employee Orientation. Training shall be provided for both managers and hourly employees, and will also be addressed during the annual refresher.
- o) This training shall include at a minimum:
 - 1) Program objectives and incident metrics reviewed
 - 2) How to conduct the observation
 - 3) How to complete the Filed Observation Card
 - 4) What do behaviors mean
 - 5) Feedback mentoring and coaching
 - 6) The knowledge that employees may be observed at any time



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17. Fire Protection Program

17.1 General

SSS fire fighting philosophy is that trained employees will perform incipient fire fighting only.

- An HSE Supervisor shall coordinate the fire protection program.
- Supervisors are responsible for implementing and enforcing the program.

17.2 Fire Prevention

SSS Employees shall learn the location and proper use of all fire extinguishers.

17.3 Fixed Fire Extinguishing Systems

- a) Fixed fire extinguishing systems shall be inspected, maintained, and tested in accordance with manufacturer's specifications and National Fire Protection Association (NFPA) guidelines.
- b) Stored pressure extinguishers that require a 12-year hydrostatic test shall be subjected to applicable maintenance procedures every 6 years. This includes Halon extinguishers and stored pressure dry chemical extinguishers.
- c) Fixed systems must be inspected annually, by an expert contractor or an SSS employee who is knowledgeable in the design and function of the system, to assure the equipment is properly maintained.
- d) Employees shall be instructed at least annually in the proper method of reporting emergencies. Local emergency telephone numbers shall be posted near telephones, with an additional copy posted on location bulletin boards for employee review.
- e) Locations shall conduct regular fire drills, at least annually. The drills shall simulate various procedures to be completed by personnel in the event of an actual fire/emergency. Drills and training exercises shall include as a minimum:
 - Capabilities and limitations of the fire protection systems and components
 - Personal protective equipment
 - Manpower allocations to fight fire
 - The fire situation chain of command



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- f) A written critique of the performance of the drill shall be prepared by the supervisor. The strengths and weaknesses of Emergency Action Plan shall be noted in this review. Appropriate remedial action shall be coordinated by an HSE Supervisor.

17.4 Portable Fire Extinguisher Placement, Marking, Inspection, Maintenance, and Training

- a) Portable hand type extinguishers will be placed along normal paths of travel, immediately available in the event of fire.
- b) Fire extinguishers, which have been discharged to any degree, will be recharged and returned to their original location.
- c) All extinguishers shall be clearly and properly marked.
- d) In areas where extinguishers cannot be seen due to visual obstructions, their locations shall be marked with signs or painted symbols, located high enough to be seen.
- e) Inspection of fire extinguishers shall be done at monthly intervals, to determine that extinguishers are available, operative, and that they:
 - Are located in their designated places and the nameplates, including operating instructions, are legible and face outward
 - Have not been actuated
 - Have not been tampered with
 - Do not have any physical damage, corrosion, or other impairments
- f) Fire extinguisher use shall be covered during New Employee Orientation, and annually thereafter, consisting of:
 - The general principles of fire
 - A review of extinguisher components
 - A fire fighting field exercise (This exercise may be as simple as extinguishing a pan fire.)
 - A review of recharge procedures
- g) All training shall be documented.



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17.5 Recording the Inspection

- a) The person making the inspection shall record their initials and the date on the inspection record card attached to the extinguisher, or on an inspection log.
- b) Maintenance of fire extinguishers shall include a thorough examination of fire extinguishers at regular intervals, not more than one year apart, or when need is specifically indicated by inspection. Any deficiencies shall be remedied, or the extinguisher replaced.
- c) The thorough examination shall include three basic elements:
 - Mechanical parts (hose, shell, puncture lever, and other operating components)
 - Extinguishing material (for example, ensure there is adequate powder, and that the powder is free flowing and designed for that extinguisher)
 - Expelling means (ensure the cartridge is of proper size and weight for that extinguisher, and contains the appropriate gas)
- d) Extinguishers removed from the premises for maintenance or recharging will be temporarily replaced with spare extinguishers of the same type and rating during the maintenance period.
- e) Fire extinguishers shall be tested hydrostatically, in accordance with NFPA Standard No. 10, at any time there is evidence of corrosion or mechanical damage, and at intervals not to exceed the following periods:
 - 12 years for dry chemical with brazed-brass, mild steel, or aluminum shells, bromotrifluoromethane (Halon 1211 or Halon 1301), and dry powder extinguishers for metal fires
 - 5 years for all other types of fire extinguishers



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17.6 Fire safety

- a) SSS Employees shall ensure adequate type ABC fire extinguishers are in or near the immediate work area.
- b) SSS vehicles shall have a minimum of one ABC rated fire extinguisher.
- c) SSS Employees shall operate fire extinguisher in accordance with *PASS*:
 - P) Pull pin,**
 - A) Aim at the base of the flame, and**
 - SS) Sweep, side to side.**
- d) **If the fire is not controllable using portable extinguishers, evacuate the area.**
- e) In case of fire, SSS Employees shall follow the Emergency Action Plan Policy.
- f) In case of fire, SSS Employees shall immediately alert the Supervisor, every other person on location, and persons in the immediate area as to the fire danger. SSS Supervisors shall immediately call the fire department (911).



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18. First Aid Policy

18.1 Introduction

In cases where bodily injury occurs at an SSS work location, it is most often SSS employees who are able to provide a first response in the form of First Aid. This is why every employee goes through certified First Aid and CPR training during orientation, taught by a certified instructor of *Medic First Aid*, and each person receives a valid certificate of training. The SSS First Aid Policy provides SSS Employees a directive for maintaining the proper first aid materials, and guidelines to follow, in cases of medical emergencies.

18.2 Scope

The SSS First Aid Policy applies to all SSS Employees.

18.3 Purpose

The SSS First Aid Policy provides SSS Employees directives for first aid kit maintenance and establishes first aid guidelines.

18.4 Required Forms

- a) Upon providing general medical assistance, the appropriate authorities may ask the SSS Employee providing first aid for additional information in accordance with applicable rules, regulations and laws. SSS Employees providing general medical assistance shall cooperate with the appropriate authorities in completing this information.
- b) All incidents and accidents shall be reported in accordance with the SSS Incidents, Accidents, Injuries and Illnesses Policy.

18.5 Policy

- a) SSS Supervisors shall ensure that complete weather proof first aid kits are maintained in adequate locations at Triple S Service Facilities, and on all SSS trucks.
- b) First aid kits shall contain an adequate supply of individually sealed eyewash solution, adhesive tape, band-aids, gauze pads, analgesics, antibacterial solution, and burn gel.
- c) First aid kits shall also contain a CPR micro shield, rubber exam gloves, and Bloodborne pathogen clean-up supplies.



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- d) Additional items that are encouraged to be kept in the first aid kit in adequate supply include- filter masks, earplugs, and safety glasses.
- e) Contents of each truck’s first aid kits shall be checked before going to the job site, and at least weekly- by the driver of the truck. Stationary office/building kits shall be checked weekly by a 3rd party, and re-stocked. Area supervisors or designee shall check eye wash stations weekly for cleanliness.
- f) In the case of a medical emergency, SSS Employees shall follow these steps:**
 - 1) Survey the scene,
 - 2) Supervisors shall account for all Employees after an emergency evacuation has been completed,
 - 3) Administer proper first aid,
 - 4) Determine the nature and the severity of injuries and illness,
 - 5) Notify the SSS Office (505-334-6196 or 505-334-6193, 24 hours a day/7 days a week) by phone or radio,
 - 6) If required, arrange to transport any injured persons to the nearest medical facility,
 - 7) Return operations to safe condition (if this can be done) or shut down the operation,
 - 8) Notify safety representatives and Supervisors,
 - 9) Complete reports and investigations as soon as practical.
- g) Area responsible persons shall ensure that first aid kits and eye wash stations are located in convenient locations and properly stocked/operable, in accordance with the SSS First Aid Policy, and employees understand their proper usage.
- h) If an area is not served by the 911 emergency contact system, the phone numbers of emergency medical service facilities shall be clearly posted.
 - Triple S Field Office (24 hours/7 days a week)..... 505-334-6193
 - Triple S Safety and Environmental Supervisor..... 505-334-6191
 - Durango Hospital..... 970-247-4311
 - Hazardous Materials Hotline..... 800-424-9300
 - Medical and Fire Emergencies..... 911
 - Poison Control Hotline..... 800-432-6866
 - San Juan County Regional Emergency Room..... 505-599-6100
 - SJCRMC (Main Switchboard)..... 505-325-5011
 - San Juan County Non Emergency Dispatch..... 505-334-6622



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19. Hearing Protection Program

19.1 Purpose

The SSS Hearing Protection Plan is intended to provide information and guidelines, to supervisory personnel who oversee work tasks and environments, where sound levels exceed a time-weighted decibel rating of 85 DBA during the course of a normal work day. These guidelines are intended to protect employees from potentially harmful effects of exposure to excessive noise.

19.2 Scope

All SSS Employees who may be exposed to excessive noise.

19.3 Purpose

The SSS First Aid Policy provides SSS Employees directives for first-aid kit maintenance and establishes first-aid guidelines.

19.4 Policy

All Employees who are subjected to a noise level of 85 dBA (action level) or above shall be included in a *Hearing Conservation Program*.

19.5 Monitoring

All workplaces suspected of having noise levels that may exceed the action level (85dba) shall be monitored by the SSS Safety Department, using current and historical data, to identify employees who receive daily noise doses, at or above the action level.

- a) Noise levels must be remeasured when any change relating to noise production, is suspected of increasing exposures to the extent that additional employees may be exposed to noise, at or above the action level, or the attenuation provided by the selected hearing protection is rendered inadequate.
- b) Noise levels must also be remeasured to determine the effectiveness of any engineering controls that are installed.



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- c) Monitoring may be accomplished through an area survey technique, or through historical data, in which sound level meter readings are combined with estimates of the length of exposure of individuals, to particular sound levels in order to calculate an eight (8) hour Time Weighted Average (TWA), or noise exposure may be measured by a personal sampling method, such as the use of noise dosimeters.

19.6 Hearing Protection

- a) Hearing protection must be made available to all workers exposed to noise levels, at or above the action level. The use of hearing protection is mandatory for those exposed at or above the Permissible Exposure Limit (PEL), and for those exposed at or above the action level.
- b) Hearing protection must reduce exposure to 85 dBA or less.
- c) SSS shall provide a variety of suitable hearing protectors from which employees may choose. This requires the availability of at least one type of plug and one type of muff.
- d) Hearing protection devices shall be supplied at no cost to employees, and replaced as necessary. It is the responsibility of the Employee to care for and maintain all of the PPE that they have been issued.
- e) Employees who repeatedly need to replace PPE due to their own negligence may be subject to the SSS Progressive Discipline Policy.

19.7 Training

Employees exposed to noise levels at or above the action level, must be trained at least annually regarding:

- a) the effects of noise
- b) the purpose, advantages, disadvantages, and attenuation of hearing protection being offered
- c) the selection, fitting, and care of protectors

19.8 Recordkeeping

Noise exposure records must be retained for two years, but data older than two years should not be discarded, unless remonitoring has been performed.

19.9 Noise Reduction

The reduction or elimination of noise producing sources and/or employee exposure shall be first sought through engineering controls.



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19.10 Responsibilities

The SSS Safety Department will be responsible for the coordination of the overall Hearing Protection Program, with specific responsibility for:

- a) Assessing the need for hearing protection
- b) Identifying those employees who should be included in the Hearing Protection Program through monitoring.
- c) Selection of the types of hearing protection to be provided to SSS employees.
- d) Providing initial training for care, use, and maintenance of hearing protection.
- e) Conducting periodic inspections and evaluation to determine the continued effectiveness of the program.
- f) Maintaining copies of all records relating to workplace monitoring and testing.

19.11 Supervisor Responsibilities

Implementation of the program is the responsibility of the Supervisor for whom the exposed employees work. These responsibilities include:

- a) Coordination of employee training schedules with the SSS Safety Office.
- b) Enforcement of the proper care and usage of assigned hearing protection.

19.12 Employee Responsibility

SSS Employees shall use the hearing protection provided, in accordance with the instructions and training received.



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20. Forklift Policy

20.1 Introduction

Material handling is a significant safety concern, considering forklifts account for numerous industrial deaths each year, and improper manual lifting is the cause of most back related injuries. During the movement of equipment and materials, there are numerous opportunities for personal injury and property damage, if proper procedures and cautions are not used. Although forklifts are utilized for moving heavy objects, their operation and proper maintenance require special precautions and training. When forklifts are not available or inappropriate, SSS Employees are required to determine alternative methods for moving heavy objects without injury.

20.2 Scope

The Forklift Policy applies to all SSS Employees engaged in or near forklift operations and/or lifting operations.

20.3 Purpose

The Forklift Policy seeks to ensure the safety of SSS Employees while conducting forklift or lifting operations.

20.4 Required Forms

- 1) Acknowledgement of Forklift Training Form
- 2) Forklift Operator Evaluation Form
- 3) Forklift Operator's Daily Checklist

20.5 Forklift Policy

Only certified, trained and authorized SSS forklift operators may operate any SSS forklift equipment. Under no circumstances shall any third party individuals be authorized to operate any SSS forklift.

20.6 Knowledge and Understanding

- a) All SSS Employee candidates for forklift operators shall meet the following basic requirements, prior to starting initial or annual refresher training: 1) must have no adverse vision problems that cannot be corrected by glasses or contacts, 2) must have no adverse hearing loss that cannot be corrected with hearing aids, 3) must have no physical



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impairments that would impair safe operation of the forklift, 4) must have no neurological disorders that affect balance or consciousness, 5) shall not be taking any medication that affects perception, vision, or physical abilities.

- b) SSS forklift trainers shall become knowledgeable with and understand the entire forklift training and certification manual including: 1) training materials, 2) certification sheets, 3) inspection check lists, 4) training roster, and 5) general forklift safety rules.
- c) SSS forklift operators shall become knowledgeable with and understand general forklift safety rules, forklift inspections and forklift inspection checklists.

20.7 Training

- a) A knowledgeable, trained and experienced SSS Forklift Operator, selected by an SSS Safety and Environmental Supervisor, shall conduct training for forklift operators. All operational training shall be conducted under close supervision. All training and evaluation shall be completed, before an operator is permitted to use a forklift, without continual and close supervision.
- b) SSS certified forklift operators must be re-certified every 3 years.
- c) SSS forklift trainees shall operate a forklift only: 1) under the direct supervision of persons, selected by a SSS Safety and Environmental Supervisor, who have the knowledge, training, and experience to train operators and evaluate their competence, and 2) where such operation does not endanger the trainee or other Employees.
- d) SSS forklift training shall consist of a combination of formal instruction, practical training (demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace.
- e) Training shall enable SSS Employees to be knowledgeable and understand forklift hazards, and their controls, including (but not limited to): 1) falling loads, 2) overloading of forklift, 3) impact with equipment, 4) piercing of containers, 5) truck float roll off, 6) chemical contact - battery acid or diesel, 7) fires during refueling, 8) control of equipment keys, 9) proper palletizing of material, 10) route planning, 11) equipment warning lights, 12) required seat belt use, 13) operating instructions, warnings, and precautions for the types of forklift the operator will be authorized to operate, 14) differences between the forklift and the automobile, 15) forklift controls and instrumentation: where they are located, what they do, and how they work, 16) engine or motor operation, 17) steering and maneuvering, 18) visibility



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(including restrictions due to loading), 19) fork and attachment adaptation, operation, and use limitations, 20) vehicle capacity, 21) vehicle stability, 22) any vehicle inspection and maintenance that the operator will be required to perform, 23) refueling and/or charging and recharging of batteries, 24) authorized fueling and recharging areas, 25) operating limitations, 26) any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate, 27) surface conditions where the vehicle will be operated, 28) composition of loads to be carried and load stability, 29) load manipulation, stacking, and unstacking, 30) pedestrian traffic in areas where the vehicle will be operated, 31) narrow aisles or other restricted places where the vehicle will be operated, 32) ramps and other sloped surfaces that could affect the vehicle's stability, 33) closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a build-up of carbon monoxide or diesel exhaust, 34) other unique or potentially hazardous conditions in the workplace, that could affect safe operation.

- f) Refresher training, including an evaluation of the effectiveness of that training, shall be conducted to ensure that the operator has the knowledge and skills needed to operate the forklift.
- g) Refresher training in relevant topics shall be provided to the operator when an operator has: 1) been observed to operate the vehicle in an unsafe manner, 2) been involved in an accident or near-miss incident, 3) received an evaluation that reveals that the operator is not operating the forklift safely, 4) been assigned to drive a different type of forklift, or a condition in the workplace changes in a manner that could affect safe operation of the forklift.
- h) A certificate to operate card will be issued upon successful completion of the training program. It will show operator name, training date, evaluation date, and trainer/evaluator name.
- i) All certified forklift operators will be given a certified forklift operator sticker for their hardhat. The sticker must be displayed on the hardhat. SSS certified forklift operators must be re-certified every 3 years.
- j) A designated SSS forklift trainer may certify and authorize a trainee as an SSS Forklift Operator, subsequent to conducting training.
- k) The Forklift Training and Certification Manual shall be maintained at the SSS Main office.



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20.8 General Forklift Safety

- a) All forklift operations shall be conducted in accordance with this SSS Forklift and Lifting Policy, and the Forklift Training and Certification Manual.
- b) A safety inspection of the following items shall be conducted by SSS Forklift Operator's prior to each day's use: 1) lights, 2) horn, 3) brakes, 4) leaks, 5) forks and boom pins, 6) seat belt, 7) hydraulic system, 8) overhead cage, 9) tires and wheels, 10) broken and loose parts, and 11) backup warning alarm. For drilling rigs, this safety check must be done at the beginning of each tower.
- c) The inspection will be documented on the Forklift Operator's Daily Checklist. If any deficiencies are noted, it is the SSS forklift operator's responsibility to notify their Supervisor, and fill out a maintenance request.
- d) The completed Forklift Operator's Daily Checklists shall be kept in the Lift Register for one month, and then may be disposed. When a new month begins, checklists from two-month's prior may be discarded. The maintenance copy of the Daily Checklist will be turned in to the SSS Shop.
- e) SSS Forklift Operators shall never exceed a forklift's rated lifting capacity.
- f) SSS Forklift Operators shall always watch for and stop for pedestrians.
- g) SSS Forklift Operators shall never operate a forklift in excess of five (5) miles per hour.
- h) When leaving a forklift unattended and/or parked, SSS Forklift Operators shall ensure a forklift's forks are fully lowered, controls are neutralized, power is shut off, and brakes set. SSS Forklift Operators shall chock the forklift wheels when the forklift is unattended or parked.
- i) SSS Forklift Operators shall always sound the forklift's horn, and look carefully at all blind intersections, corners, or when backing up.
- j) SSS Forklift Operators shall always center the forklift's forks under the load, always keep the load against the forklift's backrest, and always attempt to spread the forklift's forks as wide as possible underneath a load.
- k) SSS Forklift Operators shall never allow any other person to be on a forklift when it is in operation (operation means that the forklift's engine is on).
- l) SSS Forklift Operators shall never operate a forklift with any arms or legs extending beyond the forklift operator's safety cage, and shall never reach through a mast for any reason.



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- m) SSS Forklift Operators shall never turn a forklift sideways on a ramp or sloped surface.
- n) SSS Forklift Operators shall always wear a seat belt when operating a forklift. If a forklift's seatbelt is missing or broken, SSS Employees are responsible to notify their Supervisor immediately. Supervisors shall ensure missing or broken seatbelts are fixed prior to subsequent forklift operation.
- o) SSS Forklift Operators shall always pre-plan the route, looking for and identifying obstacles and hazards.
- p) SSS Forklift Operators shall not drive up to anyone standing in front of a catwalk, substructure, truck, trailer, or other fixed object.
- q) SSS Employees shall ensure no person is allowed to stand or pass under the elevated portion of any forklift, whether loaded or empty.
- r) SSS Forklift Operators shall maintain a safe distance from the edge of ramps or platforms while on any elevated platform. There shall be sufficient headroom under overhead installations, lights, pipes, I-beams, etc.
- s) Prior to loading or unloading, SSS Forklift Operators shall verify trailer chocks, supports, and dock plates are properly set and secured.
- t) A spotter will be utilized for all forklift operations.

20.9 Loading

- a) Only stable and safely arranged loads shall be handled by an SSS Forklift Operator.
- b) Caution shall be exercised when handling off-center loads which cannot be centered.
- c) Only loads within the rated capacity of the forklift shall be handled by an SSS Forklift Operator.
- d) Long or high (including multiple-tiered) loads which may affect capacity shall be adjusted prior to operation by an SSS Forklift Operator.
- e) SSS Forklift Operators shall ensure that forklifts equipped with attachments, are operated as partially loaded forklifts, when not handling a load.
- f) SSS Forklift Operators shall ensure that the load engaging device is placed under the load as far as possible.
- g) The mast shall be carefully tilted backward to stabilize the load.
- h) SSS Forklift Operators shall ensure that extreme care is used when tilting the load forward or backward, particularly when high tiering.



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- i) Tilting forward with the load engaging device elevated shall be prohibited, except to pick up a load.
- j) An elevated load shall not be tilted forward except when unloading.
- k) When stacking or tiering, only enough backward tilt to stabilize the load shall be used.
- l) Tag lines will be used when necessary to help control the load- two opposing tag lines give better control than just one.

20.10 Fueling Safety

- a) SSS Forklift Operators shall ensure that fuel tanks are not filled while the engine is running.
- b) All spillage shall be avoided.
- c) SSS Forklift Operators shall ensure that spillage of oil or fuel is carefully cleaned up, or completely evaporated, and the fuel tank cap replaced, before restarting the engine.
- d) SSS Forklift Operators shall ensure that forklifts are not operated with a leak in the fuel system.



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21. Hazardous Communication **(HAZCOM, HAZWOPER & MSDS)** **Policy**

21.1 Introduction

The SSS HAZCOM Policy was developed to inform and train Employees, concerning the use and dangers associated with hazardous chemicals, controlling hazards, proper labeling of containers, and understanding the use of Material Safety Data Sheets (MSDS). Among other things, this Policy outlines how to handle hazard communication as it applies to SSS work activities. HAZWOPER- dealing with what to do in the case of a hazardous spill- is also addressed. The HAZCOM Policy ensures that SSS Employees will recognize and work safely, with hazardous chemicals and materials.

21.2 Scope

The SSS HAZCOM Policy applies to all SSS Employees who engage in any activities involving hazardous chemicals.

21.3 Purpose

To inform SSS Employees of the hazards from the chemicals they may encounter while on the job, and the correct safety equipment needed to use the chemical in a safe manner, so Employees, materials and the environment are not harmed when the chemical is used.

21.4 Required Forms

- None

21.5 General HAZCOM Requirements

- a) SSS Supervisors and Employees shall be committed to provide Employees and colleagues the training and equipment tools necessary, to prevent and eliminate adverse health effects from exposure to workplace chemicals.
- b) The “Hazardous Communication Standard” gives Employees the right to be informed of the hazards of chemicals with which they work.
- c) As written, the standard requires chemical manufacturers and importers to evaluate the chemicals, and to determine if they are hazardous. This evaluation includes both health and physical hazard parameters, while



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also placing responsibility on employers to convey this information to their Employees.

- d) SSS Employees shall seek assistance from their Supervisor, or an SSS Safety and Environmental Supervisor, if the required chemical, handling or safety information (MSDS) cannot be found, or if additional details are required.
- e) No container that has been damaged, or does not have the appropriate labeling, shall be received, accepted, or transported by an SSS Employee.
- f) SSS Supervisors and Employees shall ensure that chemical inventories and safety information (MSDS) are maintained, and ensure that an SSS Safety and Environmental Supervisor has been notified about any new chemicals at the work location.
- g) SSS Safety and Environmental Supervisors shall ensure that the MSDS Manual is updated, when changes in inventories occur.

21.6 Labels and Other Forms of Warning

- a) All SSS Employees shall ensure that chemical containers are properly labeled or tagged within any SSS work area.
- b) The label or tag shall identify: the name of the material, provide appropriate hazard warnings, name and address of the manufacturer/importer or responsible party, be legible, and written in English.
- c) Labels shall not to be defaced or removed. Any damaged or unreadable labels shall be replaced as soon as possible.
- d) Hazard warnings shall be brief statements regarding the effects of the chemical (e.g. - flammable, causes lung cancer, etc.) and/or symbols or numbers shown in the National Fire Protection Association (NFPA) label.
- e) Information regarding hazard warnings shall be obtained from MSDS.

21.7 Material Safety Data Sheets (MSDS)

- a) MSDSs must be obtained for each chemical, from the manufacturer, supplier or vendor. Each major location's MSDSs sheets shall be kept in a Master MSDS Manual, readily accessible to all employees.
- b) SSS Employees shall develop a working knowledge of the chemicals they come into contact with, by reading and understanding the MSDS information that is associated with those chemicals.
- c) SSS Employees, who come into contact with chemicals, shall have a MSDS accessible and readily available, for each chemical stored or used at the location.



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- d) SSS Employees shall adhere to all PPE, first aid, labeling and other requirements for the chemicals they come into contact with, as described by MSDS information.

21.8 Employee Information- Access and Training

- a) SSS Supervisors shall ensure that each SSS Employee is notified of the location of the MSDS book, and how to read and understand the MSDS.
- b) All current and newly hired Employees, who are potentially exposed to chemicals, shall attend a HAZCOM training program, and shall be properly trained regarding: the use and dangers associated with hazardous chemicals, controlling chemical hazards, proper labeling of containers, and the use of Material Safety Data Sheets (MSDS), prior to any and all hazardous chemical exposure.
- c) SSS Employees who work with chemicals shall be informed regarding chemical clean up and first-aid procedures, for any chemicals associated with the job.
- d) Prior to beginning work involving chemicals, all SSS Employees shall educate themselves about the potential chemical hazards associated with the job.
- e) If performing non-routine tasks, contact your supervisor before beginning work, to assist you in determining hazards that may be involved, and precautions required to safely perform the task.
- f) All multi-employer and/or multi work sites shall provide MSDSs of hazardous goods, used by anyone, or any company, operating on the site, to be kept in the location trailer (doghouse).
- g) If other companies or departments/persons are also performing tasks using chemicals in your work area, MSDS sheets for those chemicals shall be available for employees to reference.
- h) ALL PROCEDURES AND COMPONENTS OF THIS HAZCOM POLICY APPLY AS A MINIMUM, TO ANY PERSON OR ANY COMPANY, OPERATING ON A LOCATION WHERE SSS IS PERFORMING WORK. While the standards of operation for others may be to a higher level, they may never be at lower level than those of SSS.
- i) All employees at SSS speak and understand English, a requirement of hire. However, bi-lingual employees have the right to have hazard communications further clarified to them by another bi-lingual employee, if they so desire.



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**21.9 HAZWOPER- Hazardous Waste Operations
and Emergency Response**

- a) **An Incidental Release-** Is a release of a hazardous substance which does not pose a significant safety or health hazard to employees in the immediate vicinity, or to the employee cleaning it up, nor does it have the potential to become an emergency within a short time frame. Incidental releases are limited in quantity, exposure potential, or toxicity and present minor safety or health hazards to employees in the immediate work area or those assigned to clean them up.
- b) An incidental spill may be safely cleaned up by employees who are familiar with the hazards of the chemicals with which they are working.
- c) The properties of hazardous substances, such as toxicity, volatility, flammability, explosiveness, corrosiveness, etc., as well as the particular circumstances of the release itself, such as quantity, confined space considerations, ventilation, etc., will have an impact on what employees can handle safely and what procedures should be followed.
- d) Additionally, there are other factors that may mitigate the hazards associated with a release and its remediation, such as the knowledge of the employee in the immediate work area, the response and personal protective equipment (PPE) at hand, and the pre-established standard operating procedures for responding to releases of hazardous substances. There are some engineering control measures that will mitigate the release that employees can activate to assist them in controlling and stopping the release.
- e) These considerations (properties of the hazardous substance, the circumstances of the release, and the mitigating factors in the work area) **combine to define the distinction between incidental releases and releases that require an emergency response.** The distinction is facility-specific and is a function of the emergency response plan.
- f) Incidental releases may be handled by an SSS employee, ensuring proper PPE is addressed according to the product(s) MSDS sheet(s) before cleanup is begun.
- g) Spills beyond this level that require and emergency response, will be addressed by outside 3rd party specialists certified to perform such work.

Both your supervisor and the Safety Department shall be advised in these cases, so the proper specialist can be called to handle the situation. The only action/responsibility of site AWS employees is to safely contain the spill to prevent it spreading beyond the initial, immediate area (containment)



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22. Hazardous Materials Security Program Policy

22.1 Introduction

Given the heightened specter of terrorism, the security of hazardous materials (HAZMAT) shipments has become a priority for carriers, shippers, consignees, emergency responders, and government officials. The existing HAZMAT transportation process, including personnel, procedures, and facilities/equipment, needs to be reexamined with a security focus. Addressing such security concerns is a part of SSS' overall strategy to manage the risks of hazardous materials during transportation.

22.2 Scope

This policy pertains to all SSS Employees who transport hazardous materials.

22.3 Purpose

This SSS Hazardous Materials Security Program provides basic means by which SSS Employees can help to protect SSS Employees and the general public, from the threat of terrorist acts, as well as the dangerous nature of hazardous materials.

22.4 Required Forms

- 1) SSS HAZMAT Shipping Papers
- 2) Emergency Response Guidebook

22.5 Personnel Security

- a) Detailed background checks shall be performed on new HAZMAT Drivers. Detailed current and past personnel information must be provided (on the appropriate form included in the SSS Driver Employment Packet), and verified before employment at SSS may begin.



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- b) SSS will verify United States citizenship for all employees. For those employees who are not U.S. citizens, SSS will verify that all immigration papers are on file and properly documented.
- c) SSS will conduct interviews when hiring new HAZMAT Drivers. Interviewers shall attempt to obtain information that will help appraise the interviewee's personality, character, motivation, honesty, integrity, and reliability.

22.6 Control of Access

There are some occasions when a HAZMAT load cannot be immediately delivered, and is brought back to the SSS yard and parked overnight. For instances when a HAZMAT load is parked in the SSS yard, the following safeguards are in place:

- a) Visitors shall check in with the front office.
- b) HAZMAT loads shall not be left on an unattended truck, unless that truck is secure, and the HAZMAT driver removes and possesses the keys.
- c) After regular business hours, all entrances to the SSS yard shall be closed and locked.
- d) Sufficient lighting shall be provided over the truck line.

22.7 En Route Security

- a) HAZMAT Drivers shall be aware of their surroundings, reporting suspicious activities immediately.
- b) HAZMAT Drivers shall be in constant communication with either their supervisor or SSS office personnel.
- c) HAZMAT Drivers shall keep the vehicle doors locked to prevent unauthorized entry.
- d) HAZMAT Drivers shall NEVER leave a vehicle with a HAZMAT load unattended while the vehicle is running.
- e) Vehicle Data Recorders utilizing real-time (Global Positioning System) tracking information in regards to vehicle route, speed, and stops shall be installed on all SSS Trucks involved with HAZMAT transport.



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22.8 Physical Route

Any SSS driver carrying hazardous materials required to be placarded or marked in accordance with 49 CFR 177.823, and not subject to NHRM routing designations pursuant to this subpart, shall operate the vehicle over routes which do not go through or near heavily populated areas, places where crowds are assembled, tunnels, narrow streets, or alleys, except where Triple S Trucking management determines that:

- 1) There is no practical alternative;
- 2) A reasonable deviation is necessary to reach terminals, points of loading and unloading, facilities for food, fuel, repairs, rest, or a safe haven; or
- 3) A highway authority requires a reasonable deviation, or a situation exists where a law enforcement official requires the driver to take an alternative route.

All shipments of hazardous materials shall be transported without unnecessary delay, from and including the time of commencement of loading of the HAZMAT, until its final unloading at destination.

22.9 SSS Employee HAZMAT Training

All appropriate SSS Field Personnel shall receive HAZMAT training covering the following four (4) areas:

- a) General Awareness Training-
 - To increase awareness of the purpose of the Hazardous Materials Regulations and of HAZCOM requirements.
 - To ensure that everyone involved in the transportation of hazardous materials uses uniform procedures.
- b) Function Specific Training to teach skills needed for a specific HAZMAT job assignment.
- c) Safety Training for any HAZMAT employee who handles or transports packages of hazardous materials, and could therefore be potentially exposed to such materials, in case of accident or incident.
- d) Driver Training for all drivers who transport hazardous materials in over-the-road vehicles.



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23. Hot Work (Welding) Policy

23.1 Introduction

The SSS Hot Work Policy establishes minimum standards and requirements for conducting gas or electric, welding or torch cutting, in a safe and efficient manner.

23.2 Scope

The SSS Hot Work Policy applies to any person conducting any operation, which may generate sufficient heat to cause ignition of flammable, combustible, or explosive materials.

23.3 Purpose

The SSS Hot Work Policy is designed to ensure the safety of persons, near any operation that may generate sufficient heat to cause ignition of flammable, combustible, or explosive materials, by requiring a Hot Work Permit prior to conducting the operation.

23.4 Required Forms

- 1) Completing the SSS Safe Work Permit Form is required. Authorization for Hot Work shall be obtained from the SSS Supervisor, as evidenced by their signed approval on the SSS Safe Work Permit Form.
- 2) A properly completed SSS Safe Work Permit Form shall include specific information indicating (at a minimum): 1) location of the work to be done, 2) date, 3) time of issue and expiration, 4) a brief description of the work, 5) special instructions for doing the job safely, and 6) results of gas monitoring test initialed by the person(s) performing the tests.

23.5 Permit required

- a) SSS Supervisors shall make the SSS Safe Work Permit Form available to all SSS Employees who conduct Hot Work Operations.
- b) Permission for Hot Work operations shall extend only for the duration of the task; however, any shift, crew, job change or emergency condition shall cancel the permit.



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- c) SSS Employees or other persons conducting Hot Work at SSS work sites shall complete the SSS Safe Work Permit Form prior to conducting Hot Work operations.
- d) Hot Work operations are approved by the SSS Supervisor, as evidenced by their signature on the SSS Safe Work Permit Form.
- e) Any SSS Employee who has conducted Hot Work operations shall indicate the completion of the operation, by filling in required completion information, and again signing the SSS Safe Work Permit Form.

23.6 Hot Work Precautions

- a) SSS Welders, with the assistance of involved SSS Employees, shall ensure that no sparks, flames or hot slag will be blown into or fall upon, any combustible material or equipment likely to be set on fire, or damaged by such sparks, flames or hot slag.
- b) SSS Welders, with the assistance of involved SSS Employees, shall wash down and thoroughly clean, any areas saturated with oil, to remove any ignitable substances. A gas meter test shall be made to ensure that no flammable/explosive vapors or gases are present.
- c) SSS Welders shall only conduct Hot Work Operations after ensuring: 1) the atmospheric conditions are safe, 2) all potential and identified hazards have been eliminated, 3) adequate ventilation exists, 4) energy sources have been isolated, and 5) a Hot Work Permit utilizing the SSS Safe Work Permit Form has been completed and approved.

NOTE: “Safe” means the atmosphere in the space is safe for hot work, as determined through the utilization of a gas monitoring device. In order for the hot work atmosphere to be considered safe, flammable gases and vapors shall be less than 10% of the lower explosive limit (LEL).

- d) When cutting or welding is done around wooden decks, SSS Welders, with the assistance of involved SSS Employees, shall ensure that the wood is first saturated with water, and appropriate fire protection equipment is ready for immediate use.



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- e) SSS Welders, with the assistance of involved SSS Employees, shall ensure that cutting or welding is not conducted on pipelines, containers, tanks, or other vessels which have contained flammable substances, until they have been thoroughly cleaned, made vapor free and tested for the presence of flammable vapors.
- f) SSS Welders, with the assistance of involved SSS Employees, shall conduct gas tests before approval is given to begin work in confined areas, where there is a possibility of flammable gases or vapors being present. SSS welders, with the assistance of involved SSS Employees, shall conduct frequent gas tests during the time the work is in progress.
- g) SSS Welders, with the assistance of involved SSS Employees, shall assign a fire watch of one or more persons, as deemed necessary by the supervisor. The Employees assigned shall have no other duties while cutting or welding is in progress. The fire watch shall have the proper fire-fighting equipment necessary to extinguish any fires that may occur as a result of the Hot Work.
- h) When cutting or welding has to be done on overhead structures, SSS Welders, with the assistance of involved SSS Employees, shall make sure that the adjacent spaces and the spaces below the work area have been cleared of combustibles and flammables, and that the spaces are safe from fires, before allowing the work to begin.
- i) Whenever perforating guns, jet cutters, chemical cutters, etc., are being armed, SSS Welders, with the assistance of involved SSS Employees, shall suspend welding operations and turn machines off, until these pieces of equipment are well below the mud line. The wire line operator in charge shall notify everyone when it is safe to continue work. This same policy shall be followed when the equipment is pulled out of the hole.
- j) SSS Welders shall ensure all personnel have been advised not to watch the welding arc, or the reflections of the arc, as this can cause eye burns. When possible, flame resistant shields or partitions shall be used to protect personnel from eye burns.
- k) SSS Welders shall ensure that all welding equipment has a separate and adequate ground, and shall not assume that all rig and/or unit components are adequately grounded.



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24. Incidents, Accidents, Injuries, and Illnesses Policy, Investigation & Reporting

24.1 Introduction

Although a goal of the SSS HSE Policy manual is to prevent all incidents, accidents, injuries, and illnesses occurring in SSS' operations, sometimes they do occur. When incidents, accidents, injuries and illnesses do occur, it is essential that SSS Employees have knowledge and understanding of the proper things to do. The SSS Accidents, Injuries and Illnesses Policy provides Employees basic guidelines for addressing these types of circumstances. It also addresses investigation & reporting.

24.2 Scope

The SSS Incidents, Accidents, Injuries and Illnesses Policy applies to all SSS Employees.

24.3 Purpose

The SSS Incidents, Accidents, Injuries and Illnesses Policy is intended to establish guidelines for SSS Employees to follow in cases of incidents, accidents, injuries and work-related illnesses.

24.4 Required Forms

- 1) The New Mexico, half-page **Notice of Accident or Occupational Disease Disablement** form, is to be completed by every employee with whom an incident resulted in certain, or possible, physical injury.
- 2) The yellow **Employee/Witness** form: SSS Employees are required to record and report all incident, accident, injury, and illness details on the yellow **Employee/Witness** form, providing sufficient details to identify the nature of accident, injury or illness; the type of medical attention required; the initial and subsequent condition of the individual.
- 3) For incidents, accidents, injuries, and illnesses resulting in a workers' compensation claim, a **Workers' Compensation** Form is required to be completed by a SSS Safety and Environmental Supervisor.



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- 4) The blue ***Manager First Report of Incident*** form: must be completed at the truck manager or gauger level. It MUST be submitted to Safety by the end of the shift on which the incident occurred. This form must be completed if: a property damage over \$500, or an environmental spill over 5 gallons, or if an employee requires medical attention.

24.5 Policy

- a) **SSS Employees shall immediately report all on-the-job incidents, accidents, injuries, and illnesses, to their Immediate Supervisor.**
- b) **The employee must complete the half-page, two part *NM First Report of Injury/Notice of Accident* form, by the end of the shift during which it occurred.**
- c) **Failure to report and complete this form will, at a minimum, result in suspension without pay.**
- d) **SSS Supervisors shall immediately report all incidents, accidents, injuries, and illnesses to an SSS Safety and Environmental Supervisor.**
- e) Accidents, injuries and illnesses shall be reported accordingly, no matter how minor they are, or appear to be.
- f) Subsequent to reporting any on-the-job incidents, accidents, injuries, and illnesses, AWS Employees shall record all facts and details pertaining to accidents, injury and illnesses immediately, on the yellow **Employee/ Witness Form**. Employees are required to record sufficient details to: 1) identify the nature of incident, accident, injury or illness, 2) the type of medical attention required, 3) the initial and subsequent condition of the individual, 4) recommendations for further treatment; and 5) recommendations for prevention of a similar event.
- g) Also on the yellow Employee/ Witness Form, employees involved, either directly or indirectly, shall provide: 1) in-depth details concerning the nature of the operation causing the accident, 2) the nature of all injuries, 3) the cause, 4) the time and date, and 5) all other relevant information which may be requested.
- h) Supervisors are to distribute the ***Employee/Witness Form*** to employees involved, or in the immediate area of the incident. The collected yellow forms must also be reviewed for completeness by the supervisor.



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- i) Supervisors are to fully complete the blue *Manager First Report of Incident* form. The completed yellow and blue forms must be turned in to Safety by the beginning of the shift after the incident occurred, but in no instance, by no later than the start of the next day.
- j) In the case of a medical emergency, SSS Employees shall follow these steps:
 - 1) Survey the scene; ensure no hazards still exist,
 - 2) Supervisors shall account for all employees after an emergency evacuation has been completed,
 - 3) Administer proper first aid- as all employees have attended First Responder/First Aid/CPR training initially, and annual refreshers,
 - 4) Determine the nature and the severity of injuries and illness,
 - 5) Notify the AWS Main Office (505-334-6191, 24 hours a day/ 7 days a week) by phone or radio,
 - 6) If required, arrange to transport any injured persons to the nearest medical facility, either directly, or by professional medical services,
 - 7) Immediately notify safety representatives, supervisors, owner clients; OSHA if applicable (within 8 hours or less).
 - 8) Control or Loss- return operations to safe condition (if this can be done) by addressing any residual hazards, or shut down the operation if personnel cannot safely do this,
 - 9) Complete the yellow *Employee/Witness Form*, and the blue *Manager First Report of Incident Form*. They must be turned in to Safety by the beginning of the shift after the incident occurred, but in no instance, by no later than the start of the next day.
- k) Injured employees shall be accompanied, by a supervisor or a member of the Safety team, when they are taken to the medical provider for initial treatment.
- l) **Should an injured employee's condition change, warranting additional medical care (non-life threatening), the Safety Department must be notified, so they can arrange for additional medical care.**
- m) **Employee visits to alternate or personal physicians, without prior direct communication with the Safety Department, is grounds for disciplinary action, up to and including, termination.**
- n) Unauthorized medical treatment will not be covered by SSS and/or SSS insurance coverage.



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24.6 Incident Investigation & Reporting

- a) All incidents will be investigated to the appropriate level with regards to incident severity, actual or potential. Root cause analysis shall be used for high level- actual or potential, injury or equipment events, or near-misses.
- b) OSHA requires reporting of work related incidents resulting in the death of an employee, or the hospitalization of three or more employees.
- c) Owner Clients require all incidents to be reported including, but not limited to, injuries, spills, property damage, fires, explosions, and vehicle damage.
- d) A trained (in Root Cause Analysis- initial and bi-annual refresher) Senior HSE Supervisor shall be responsible for incident response, and incident investigative techniques.
- e) The HSE Safety Supervisor shall have the necessary tools for conducting a proper investigation, including but not limited to- digital camera, yellow and blue reporting forms, etc. The yellow *Employee/Witness Form*, and the blue *Manager First Report of Incident Form*, must be reviewed, and verified for completion and accuracy.
- f) The HSE Safety Supervisor, trained in Root Cause Analysis, shall ensure collection, preservation and security of incident evidence.
- g) The global *Event Tracker Database* shall be used to track corrective actions resulting from incident investigations, showing responsible person(s), and completion of those actions.
- h) All events registered in the *Event Tracker Database* shall have a detailed Event Report prepared by the HSE Safety Supervisor. The Event Report shall include photographs, summary, witness statements, details, immediate actions, contacts and corrective actions.

If necessary, a *Safety Alert* shall also be created and distributed within the company, so that relative learnings can be shared, and corrective actions applied in other areas.



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25. Jewelry Policy

25.1 *Introduction*

Due to the severity of accidents caused by jewelry, becoming entangled in moving or stationary equipment, SSS has elected to implement a jewelry policy.

25.2 *Scope*

The jewelry policy applies to all SSS personnel.

25.3 *Required Forms*

- None

25.4 *Policy*

SSS personnel shall not wear jewelry while performing any work or task, which presents the potential of the jewelry to get caught in, on or between objects.

In some circumstances, specific types of jewelry may be prohibited due to the nature of the job or the specific task being performed, and the potential hazards being encountered. Jewelry is defined as, but not limited to rings, bracelets, necklaces, earrings, wristwatches, chains attached to wallets or watches, etc.

Personnel wearing medical identification jewelry are not prohibited from wearing medical identification jewelry, but are to do so in such a way that the identification does not pose a hazard (e.g. - worn inside of clothing).



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26. Job Hazard Analysis (JHA) Policy

26.1 Introduction

SSS recognizes that many persons engaged in SSS work activities experience many hazards and Potential Hazards every minute of every day. In an effort to identify, minimize and ultimately eliminate all hazards and Potential Hazards causing any HSE damage and injury, SSS has developed a fit-for-purpose JHA Policy. A SSS JHA is a detailed study of a specifically identified job task, and takes into consideration the conditions under which the job is to be performed, the demands on the part of the person doing the job, and the chance for an accident to occur.

26.2 Scope

The SSS JHA Policy applies to all SSS Employees engaged in hazardous or potentially hazardous work activities.

26.3 Purpose

The SSS JHA Policy and associated JHA Process guidelines, establish guidelines for addressing job hazards. The JHA is a tool used by SSS to prevent accidents and improve efficiency. JHAs identify key job steps, potential injury or property damage hazards, specific individual job responsibilities, and ways to eliminate, protect against, or control the Potential Hazard.

26.4 Required Forms

- SSS Job Hazard Analysis (JHA) Form

26.5 Policy

- a) SSS Employees shall perform a JHA, in accordance with the SSS JHA Procedure, prior to beginning work activities for the first time each day, or after extended break periods, and upon determination that a work activity is an identified “major job requiring an additional JHA”, pursuant to the SSS JHA Procedure.
- b) The SSS rig up department shall perform load specific JHA’s, as conditions may vary for each load being transported.



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- c) **An additional JHA meeting shall also be conducted by SSS Employees when conditions change from the scope of the original JHA.**
- d) The SSS Crew Supervisor shall ensure that everyone on location involved with the specific task to be performed requiring a JHA, is present, attentive and participates in the JHA meeting.
- e) SSS Employees conducting JHAs shall ensure the specific task, the main steps for performing that task, and the hazards related to each step, have been identified in their JHA.
- f) SSS Employees conducting JHAs shall ensure actions to prevent identified hazards, from producing unplanned events and specified people to carry out those actions, have been identified in their JHA.
- g) SSS Employees conducting JHAs shall ensure that hazards, actions and personnel responsibilities have been reviewed immediately prior to conducting a JHA eligible work activity
- h) SSS Employees conducting JHAs shall ensure that changes to standard operating procedure, have been thoroughly reviewed in accordance with the SSS MOC Policy, and documented on the JHA form.
- i) When visitors come onto a SSS work location, SSS Employees shall clearly communicate major hazards that visitors can be exposed to.
- j) SSS Employees shall require the location visitor to sign the JHA form, in acknowledgement that the major hazards have been communicated to them.



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27. Ladder Safety Policy

27.1 Introduction

Ladders are an effective, and sometimes the only means of access to different levels in the work place, as well as at home. Unfortunately, improper use and care of this handy device accounts for thousands of injuries each year.

27.2 Scope

This Ladder Safety Policy applies to all SSS Employees whose work involves the use of portable or fixed ladders.

27.3 Purpose

The Ladder Safety Policy establishes guidelines for SSS Employees to avoid injuries caused by falls from ladders.

27.4 Required Forms

- None

27.5 Policy

- Ladders shall be visually inspected for defects before each use.
- Portable ladders with structural defects- such as broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components- must immediately be marked defective, or tagged with "Do Not Use" or similar language, and withdrawn from service until repaired or destroyed.
- Fixed ladders with structural defects- such as broken or missing rungs, cleats, or steps, broken or split rails, or corroded components- must be withdrawn from service until repaired.
- Defective fixed ladders are considered withdrawn from service, when they are 1) immediately tagged with "Do Not Use" or similar language, 2) marked in a manner that identifies them as defective, 3) blocked (such as with a plywood attachment that spans several rungs) or destroyed.
- Ladder repairs must restore the ladder to a condition meeting its original design criteria, before the ladder is returned to use.



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- f) SSS Employees shall not use chairs, boxes or similar objects for overhead access, nor shall they climb on structures or equipment for such a purpose. The appropriate ladder shall always be used for the task at hand.
- g) When portable ladders are used for access to an upper landing surface, the side rails shall extend at least 3 feet above the upper landing surface. When such an extension is not possible, the ladder shall be secured, and a grasping device such as a grab rail shall be provided to assist workers in mounting and dismounting the ladder.
- h) A ladder extension shall not deflect under a load that would cause the ladder to slip off its support.
- i) Ladders shall be maintained free of oil, grease, and other slipping hazards.
- j) Ladders shall not be loaded beyond the maximum intended load for which they were built, or beyond the manufacturer's rated capacity.
- k) Ladders shall be used only for the purpose for which they were designed.
- l) Non self-supporting ladders shall be used at an angle, where the horizontal distance from the top support to the foot of the ladder, is approximately one-quarter of the working length of the ladder (a 4 to 1 ratio).
- m) Fixed ladders shall be used at a pitch no greater than 90 degrees from the horizontal, measured from the back side of the ladder.
- n) Ladders shall be used only on stable and level surfaces, unless secured to prevent accidental movement.
- o) Ladders shall not be used on slippery surfaces, unless secured or provided with slip resistant feet to prevent accidental movement.
- p) Slip-resistant feet shall not be used as a substitute for care in placing, lashing, or holding a ladder upon slippery surfaces.
- q) Ladders, placed in areas such as passage-ways, doorways, or driveways, or where they can be displaced by workplace activities or traffic, shall be secured to prevent accidental movement, or a barricade shall be provided to keep traffic or activities away from the ladder.
- r) The area around the top and bottom of the ladders shall be kept clear.
- s) The top of a non self-supporting ladder shall be placed with two rails supported equally, unless supported with a single support attachment.
- t) Ladders shall not be moved, shifted, or extended while in use.
- u) Ladders shall have nonconductive side rails, if they are used where the worker or the ladder could contact exposed energized electrical equipment.



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- v) The very top TWO rungs (this includes the very top) of a stepladder shall not be used as a step.
- w) Cross-bracing on the rear section of stepladders shall not be used for climbing, unless the ladders are designed and provided with steps for climbing, on both front and rear sections.
- x) Ladders shall be inspected by a competent person for visible defects on a periodic basis, and after any incident that could affect their safe use.
- y) Single-rail ladders shall not be used.
- z) When ascending or descending a ladder, the worker shall face the ladder.
 - aa) Each worker shall use at least one hand to grasp the ladder when moving up or down the ladder.
 - bb) A worker on a ladder shall not carry any object or load that could cause the worker to lose balance and fall.
 - cc) Ladder rungs, cleats and steps shall be uniformly spaced, parallel and level when the ladder is positioned for use.

27.6 Training

SSS shall provide a training program for each employee using ladders and stairways. The program must enable each employee to recognize hazards related to ladders and stairways, and to use proper procedures to minimize these hazards.



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28. Lock-Out/Tag-Out (LO/TO) Policy

28.1 Introduction

The SSS LO/TO Policy establishes minimum standards and requirements for controlling energy sources during the service, repair or maintenance of machinery and equipment. Some sources of stored energy may include electrical, mechanical, gravity, hydraulic, pneumatic, or stored pressure.

28.2 Scope

The SSS LO/TO Policy shall be used by SSS Employees to safely isolate potentially hazardous energy sources, in a particular work area or work location, during service or maintenance work.

28.3 Purpose

The requirements in the SSS LO/TO Policy will aid in preventing injury to SSS Employees, damage to property, or damage to the environment, due to the unexpected energizing, start-up, or release of stored energy.

28.4 Required Forms

- 1) Lock-Out / Tag-Out (LO/TO) Energy Control Form.
- 2) All LO/TO shall be documented on the LO/TO Energy Control Form, noting persons involved and their title, equipment involved, date of LO/TO, hazard control steps completed, and time cleared.
- 3) The authorized SSS LO/TO Employee is also required to sign-out a LO/TO operation on the LO/TO Energy Control Form upon completion of a LO/TO operation.

28.5 Training and Authorization

- a) SSS Supervisors, Truck Pushers and Safety and Environmental Supervisors shall provide LO/TO training to newly hired Employees, and additional training shall be provided whenever there is a change in an Employees job assignment, change in equipment, change in processes that would create a new hazard, or change in SSS LO/TO Procedures.



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- b) Only SSS Employees who have had specified LO/TO training, and who have been subsequently authorized to perform LO/TO operations by an SSS Supervisor, shall perform any LO/TO operations.
- c) Training shall include (at a minimum): 1) review of the requirements of 29 CFR 19190.147, Control of Hazardous Energy, 2) types and magnitudes of energy sources, 3) limitations of LO/TO, 4) SSS LO/TO procedures for the isolation of energy sources, 5) procedures for removing locks and/or tags, and 6) procedures for restoring energy.
- d) Only Authorized SSS Employees may initiate and ultimately perform LO/TO Procedures.
- e) A list of LO/TO trained and authorized SSS LO/TO Employees shall be maintained by the SSS Safety and Environmental Department.

28.6 Identification and shut-down of energy sources

Authorized LO/TO SSS Employees preparing to conduct LO/TO shall ensure that-

- a) All energy sources (sometimes more than one) have been identified prior to conducting any inspection, service, repair or maintenance of machinery and equipment.
- b) Involved equipment has completely stopped prior to proceeding to isolate energy sources.
- c) The power is turned off at the switch box and the switch locked in the off position, pursuant to SSS LO/TO Procedures, prior to any inspection, service, repair or maintenance of machinery and equipment.
- d) Through attempted operation of machinery, equipment, valves, etc., that all energy sources are effectively isolated prior to commencing any inspection, service, repair or maintenance of machinery and equipment.
- e) All switches and controls are securely locked and tagged to prominently indicate that the equipment or circuits are being inspected, serviced, repaired or maintained, pursuant to SSS LO/TO Procedures, prior to any inspection, service, repair or maintenance of machinery and equipment.
- f) Machinery and equipment is isolated from all potentially hazardous energy sources, pursuant to SSS LO/TO Procedures, prior to any inspection, service, repair or maintenance of machinery and equipment.
- g) Machinery or equipment is free from all residual or accumulated energy prior to any inspection, service, repair or maintenance.



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28.7 Notification and communication

- a) The authorized SSS LO/TO Employee shall identify all affected Employees by name and title, which may be affected by and/or involved in the impending LO/TO.
- b) All persons on location or near machinery or equipment requiring LO/TO shall be notified by the authorized SSS LO/TO Employee whenever a LO/TO will occur, as well as when the machinery or equipment is being placed back into service.

28.8 Locks and Tags

- a) Locks, tags and other LO/TO hardware required by this Policy shall not be used for any purpose other than LO/TO.
- b) Locks shall have the authorized SSS LO/TO Employee's name and only one key particular to that worker.
- c) Tags shall include: the condition or reason for tagging, the date, the equipment being tagged, the signature of the person applying the tag, and the words "**DANGER, DO NOT OPERATE.**"

28.9 LO/TO Operations

- a) The authorized SSS LO/TO Employee conducting LO/TO operations shall be identified on the LO/TO Energy Control Form prior to conducting LO/TO operations, and all machinery or equipment shall be LO/TO in accordance with the specific equipment or machinery specification and requirements.
- b) The authorized SSS LO/TO Employee shall obtain the proper LO/TO Procedure for the specific equipment or machine to be locked-out / tagged-out.
- c) The authorized SSS LO/TO Employee conducting the inspection, service, repair or maintenance of machinery or equipment shall hold the key to the lock. The key shall never be given to any other person.
- d) If machinery or equipment is still being worked on at the end of the shift, the LO/TO shall be closed out and another prepared by the authorized SSS LO/TO Employee of the oncoming crew. The outgoing LO/TO Employee shall provide complete and accurate information regarding the status of the LO/TO operation to the oncoming crew.
- e) The authorized SSS LO/TO Employee shall ensure equipment guards are restored, tools are stowed, and personnel are clear of all machinery before removing LO/TO and reenergizing equipment.



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28.10 *Contractors and Third Party Vendors*

SSS customers' and third party vendors' employees should not sign the SSS LO/TO Energy Control Form. SSS customers' and third party vendors' employees should document their activities on their company specified form.



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29. Management of Change (MOC) **Policy**

29.1 Introduction

The SSS MOC Policy provides guidelines for obtaining permission from Supervisors and Management, to improve or replace equipment and or procedures. The SSS MOC Policy also requires effective communication of approved changes to all people involved, to ensure HSE safety.

29.2 Scope

The SSS MOC Policy applies to all SSS Employees, all SSS customer's employees and all third party contractors' Employees who experience, or could experience, any hazard while conducting operational duties on a SSS location.

29.3 Purpose

The SSS MOC Policy shall be utilized to protect Employees from hazards and Potential Hazards that may arise due to machinery, equipment and/or procedures. The SSS MOC Policy requires thorough investigation, communication and specified actions, to inform Employees of hazards and Potential Hazards, and ways to reduce or eliminate their danger.

29.4 Required Forms

- SSS Management of Change (MOC) Form

29.5 Policy

- a) All SSS Employees shall be knowledgeable and understand SSS' requirements for causing an MOC, in addition to the MOC policies and process.
- b) SSS Employees shall be knowledgeable and understand SSS customer's requirements for causing an MOC, in addition to that customer's MOC policies and process.



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- c) SSS Employees shall conduct an MOC prior to any change in equipment including, but not limited to, type, size, shape, or specifications (e.g. - higher/lower pressure rating, bigger/smaller part, and additional/fewer parts).
- d) SSS Employees shall conduct an MOC prior to any change in a standardized work process (e.g. - more/fewer steps, more/fewer people, more/less time).
- e) SSS Employees shall conduct an MOC prior to any change affecting equipment controls, pressures, and equipment ratings and operating conditions (e.g. - starters including remote control, kill switches, fuel and filler tubes).
- f) An MOC may be conducted, but is not required, by SSS Employees when changes to equipment or a work process, is the exact same as the changed equipment and process.

29.6 Guidelines for use and approval

- a) If any qualified change is determined to be needed by any SSS Employee (or SSS customer's or third party contractor's employee) at a work location, the SSS MOC Policy and Procedure shall be employed, and an SSS MOC Form shall be utilized by the SSS Employee suggesting the change.
- b) All proposed changes of qualified equipment and/or standardized work processes should be communicated to the Supervisor (e.g. - Swamper to the Driver, Driver to the Pusher, and Pusher to Management).
- c) All proposed changes of qualified equipment and/or standardized work processes shall be discussed by every person involved, or potentially involved, regarding detailed effects, to all related equipment and job activities. Primary discussion focus shall be any potential HSE damage and/or injury.
- d) SSS customers or third party contractors shall be involved in all SSS MOC discussions, pursuant to their policies, which have any effect on their equipment, personnel and/or policies.
- e) Prior to any change of qualified equipment and/or standardized work processes, every person involved in the MOC discussion shall identify themselves (by title and name), and their acceptance or refusal of the proposed change on the SSS MOC form, being utilized for the specific change.



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- f) Final approval or rejection, for change in any qualified equipment and/or standardized work processes, shall be made by an SSS Manager, after seeking input from upper Management when necessary.
- g) SSS Management shall be involved in all MOC discussions that have significant potential HSE damage or injury, or require additional capital funding. A decision of final approval or rejection, and reasons for the decision, shall be noted on the SSS MOC form being utilized for the specific change.
- h) If a proposed change is approved by an SSS General Manager, all SSS Employees, SSS customer's employees and third party contractor's Employees involved with work operations in the general area, or the change, shall receive communication as to the approved change. Communication of approved changes shall also include all persons involved in the MOC review process.



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30. Manual Lifting Policy

30.1 *Introduction*

Manual material handling is a significant safety concern, considering improper lifting is the cause of most back related injuries. During the movement of equipment and materials, there are numerous opportunities for personal injury and property damage, if proper procedures and caution are not used. To prevent painful back injuries, it is important that all Triple S Employees follow safe lifting practices when lifting heavy objects.

30.2 *Scope*

The Manual Lifting Policy applies to all SSS Employees engaged in manual lifting operations.

30.3 *Purpose*

The Lifting Policy seeks to ensure the safety of SSS Employees while conducting lifting operations.

30.4 *Required Forms*

- None

30.5 *Policy*

- a) SSS Employees shall make every effort to use appropriate labor saving devices whenever possible.
- b) SSS Employees shall always follow industry accepted standards and safety guidelines for lifting including (but not limited to):
 - 1) Always lift utilizing the legs, rather than the back,
 - 2) Be certain to have a firm grasp and firm footing prior to lifting,
 - 3) Do not twist when lifting- instead use the feet to rotate the body and the load,
 - 4) Hold the load as closely as possible to the chest,
 - 5) Test the corner of loads prior to lifting,
 - 6) Assistance must be obtained to lift or move anything that is too heavy for personal ability, and
 - 7) Be familiar with hoist lifting operations, and use proper hoisting signals.



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- c) When transferring materials by chain hoists SSS Employees shall:
 - 1) Alert all personnel in the area to be aware of the materials and equipment in motion, the items being moved, and placement in the work area,
 - 2) Use work gloves to protect hands,
 - 3) Back away and stay clear of load,
 - 4) Never stand underneath load as it is being lifted, moved or lowered,
 - 5) Beware of strike zones and pinch points, and
 - 6) Use spotters when appropriate.
- d) SSS Employees who utilize- air hoists, chain and ratchet pulleys, friction brakes, cable slings, rope, load blocks and wire cable connections- shall become familiar with their safe load capabilities prior to use.
- e) SSS Employees are encouraged to utilize assistive mechanical devices and equipment whenever possible. If possible, utilize lifting equipment (dollies, wheelbarrows, winches, forklifts, etc.) for assistance, even if the load is lighter than personal capabilities.



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31. Mechanical Lifting Policy

31.1 Introduction

Lifting operations are an important aspect of Triple S Trucking's business. Mistakes made during lifting can result in loss of life via, electrocution, falls crushing injuries, explosions, or release of toxic substances. Property damage and loss of production can be severe when lifts go wrong. Extreme caution must be used at all times during lifting activities.

31.2 Scope

The SSS Mechanical Lifting Policy applies to all SSS Employees conducting lifting, rigging equipment and operations.

31.3 Purpose

This standard provides minimum requirements for safe lifting operations. Operations covered within the scope of this process are those associated with lifting operations involving winch trucks and gin pole trucks.

31.4 Required Forms

- Job Hazard Analysis

31.5 General Requirements

- a) All winch trucks, gin pole trucks, chains hoists and lifting equipment shall be tested, inspected and maintained in accordance with the applicable safety and health regulations, and this program.
- b) Only competent operators, lift leaders and riggers shall perform lifting operations.
- c) The command "STOP" may be given by anyone, and must be obeyed by everyone, including the truck, winch or hoist operator.
- d) Lifting equipment that is not in use shall be removed from the immediate work area, and stored properly.



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31.6 Lifting Operations

Before commencing lifts utilizing cranes, hoists, or other mechanical lifting devices, SSS Supervisors shall ensure that:

- a) An assessment of the lift has been completed, and the lift method and equipment have been determined to be appropriate, by a competent person.
- b) Operators of powered lifting devices are trained and deemed competent for that equipment.
- c) Rigging of the load is carried out by a competent person.
- d) All lifting devices and equipment have been visually examined before each lift, by a competent person.
- e) Lifting devices and equipment have been inspected and approved for use within the last 12 months (at a minimum).
- f) The load does not exceed dynamic and/or static capacities of the lifting equipment.
- g) Any safety devices installed on lifting equipment are operational.

31.7 Winch & Gin Pole Trucks

- a) A preventive maintenance program based on the equipment manufacturer's recommendations shall be established. All maintenance documentation shall be maintained.
- b) Manufacturer's recommendations for inspections and equipment condition shall be followed. At a minimum, all equipment shall be inspected as follows:
 - Visual before daily use (Documentation not required)
 - Monthly (Documentation is required)
 - Annually (Documentation is required)
- c) All deficiencies or hazards found during an inspection shall be corrected or repaired before the winch truck, gin pole truck, or lifting equipment is placed into service. All lifting equipment found to be defective shall be removed from service immediately.
- d) All winch trucks shall have an accurate load-rating chart affixed to the unit, in plain view of the operator when the truck is being used.
- e) Gin Poles should be examined to verify that they are evenly anchored and positioned.
- f) Bent or cracked Gin Poles shall be taken out of service for repair or replacement, before lifting commences.



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- g) All personnel shall stand clear, and keep fingers clear, while tension is being applied to the line.
- h) All personnel shall keep fingers clear of the tailboard when securing the hook.
- i) Attention shall be taken at all times to maintain clearance between the “little block” and the tail chain. Do not winch the tail chain into gin pole snatch blocks.
- j) Maintain gin pole height to keep clearance between the pole and the truck bed. Do not lower the gin pole to an angle that pinches the pole against the truck bed.

31.8 *Wire Ropes, Chains, and Slings*

- a) The Monthly Lift Register must be maintained by the area manager, for recording the monthly inspection of all wire ropes, chains and slings.
- b) Safe Rigging practices shall be followed at all times.
- c) The use of wire rope, chains, slings and associated fittings shall be in accordance with the manufacturer’s recommended guidelines.
- d) All lifting equipment shall be visually inspected for damage before use, and as necessary during its use, to ensure that it is safe. No documentation of this inspection is necessary.
- e) Any equipment found to be defective shall be removed from service immediately and destroyed.
- f) Synthetic fabric slings, wire rope slings and steel alloy chain slings must have a legible load rating attached. The recommended safe working load shall not be exceeded. If the load rating is missing or cannot be read, the sling shall be removed from service.
- g) Prior to initial use, any new, repaired or reconditioned chain sling, shall be proof-tested by the manufacturer, and applicable certification kept on file.
- h) Slings shall not be shortened with knots or bolts. Knots shall never be used with any sling, chain, or wire rope.
- i) Slings shall not be pulled from under a load, when a load is resting on the sling.
- j) Employees shall not place hands or fingers between the sling and the load, or between the sling and any other equipment.
- k) Any sling found to be defective shall be removed from service immediately, and destroyed. Refer to the manufacturer’s specifications on when a sling is defective.
- l) All chain slings used for lifting shall be grade 80, or better, alloy steel chain.



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- m) All slings, shackles, eyebolts, chains, hooks and wire ropes shall be inspected preceding a lift. This inspection shall be performed in addition to the monthly and annual inspections. Any damaged or defective components shall be removed from service.
- n) Replaced components shall be destroyed or retired in a manner that prevents them from being used again.
- o) Inspections of slings shall include items listed in the SSS Sling and Rigging Attachment Inspection Requirements.
- p) At a minimum, all slings shall be inspected as follows:
 - Before Daily Use (Documentation is not required).
 - Monthly- Documentation is required in Lift Register.
 - Annually- Documentation is required in Lift Register.
- q) All deficiencies or hazards found during an inspection shall be corrected or repaired before the sling is placed into service. Defective slings shall be removed from service and destroyed.

31.9 Plasma Winch Lines and Bridles

- a) Plasma offers several distinct advantages over wire rope, when used for winch lines or bridles.
 - 1) Plasma is one-tenth the weight of equivalent strength wire, virtually eliminating associated sprains and strains which often result from handling heavy wire lines or bridles.
 - 2) Elimination of wickers and loose wire stands, capable of causing cuts or puncture wounds.
 - 3) Extremely low recoil energy during failure, in sharp contrast to the often violent reaction when wire lines or bridles fail.
- b) Just as with wire rope products, plasma should be examined each time before use, for signs of damage or abuse. If one strand is cut through, or two cut in half, etc., then the bridle should be taken out of service. If a winch line, the line needs to be re-terminated to eliminate the cut portion.
- c) Drivers are responsible for submitting a written inspection evaluation on all plasma products, the first week of every month.
- d) Retention sleeves must be used on all winch lines, to secure a bridle into the tail hook. The reason for this is to minimize the potential for the bridle slipping out of the hook during loading or unloading, possibly resulting in a loss of load. Retention sleeves should also be used with wire bridles, for the very same reasons.



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31.10 Standard Hand Signals

- a) Hand signals to the truck driver shall be in accordance with SSS Hand Signal Training.
- b) Signals shall be discernible or audible at all times.
- c) Some special operations may require addition to or modifications of the basic signals. For all such cases, these special signals shall be agreed upon and thoroughly understood, by the person giving the signals and the truck driver, and shall not be in conflict with the standard signals.
- d) Direct and clear communication is always required between the truck driver and the lift leader/signal person.
- e) One individual shall be designated as the signal person to communicate with the truck driver. This individual shall be positioned to have continuous visual contact with the truck driver.
- f) If visual contact cannot be maintained, a Critical Lift Assessment and Plan must be completed, and alternate means of continuous communication must be used, (i.e. - radio or equivalent).
- g) If communication is interrupted or lost, the truck operator shall stop moving the load immediately, until communication is re-established.

31.11 Moving and Lifting the Load

- a) Each lift shall have a JHA completed prior to the lift.
- b) Retention sleeves must be used on all winch lines, to secure a bridle into the tail hook. The reason for this is to minimize the potential for the bridle slipping out of the hook during loading or unloading, possibly resulting in a loss of load.
- c) Hoisting and rigging operations for all lifts require a designated lift leader, who shall be present at the lift site during the entire lifting operation. The lift leader designation may be by written instructions, specific verbal instructions for the particular job, or clearly defined responsibilities within SSS' organizational structure. If only one person is making the lift, that person assumes all responsibilities of the designated lift leader.
- d) The designated lift leader shall make certain the load is rigged correctly.
- e) All personnel in the vicinity of lifting operations, who are not directly involved with the lift, shall stay out of the immediate area.
- f) Loads shall not be carried over people.
- g) Personnel shall not pass under suspended loads. No person shall be allowed to be under a suspended load.



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- h) Work on suspended loads is prohibited. Suspended loads include the lifting hook, rigging, spreader bars, and any other attachments below the lifting hook.
- i) No one shall be on the load, hook or rigging, during hoisting, lowering or swinging of the load, or while the lifting equipment is traveling, except as noted in the Critical Lifts section of this policy.
- j) Tag lines shall be utilized to maintain control of suspended loads, except where the use of such lines would create a greater hazard. Tag lines shall be of a length, such that the user will not be drawn into/under the suspended load. The line must be in good condition, and cannot contain knots or cuts.
- k) SSS Employees shall never touch a suspended load with any part of their body. More than one tag line may be used if the situation warrants.
- l) Tag lines shall be made of natural or synthetic fiber rope, or synthetic strap. Wire rope or metal chain shall not be used for tag lines.
- m) The load shall be secured and balanced in the sling or lifting device, before it is lifted more than a few inches.
- n) The distance that suspended loads are carried shall be kept to a minimum.
- o) The Lift Leader shall be present at the site during lift operations.
- p) A JHA and Risk Assessment shall be completed when the velocity of the wind exceeds 20 mph. If wind speeds reach 30 mph, lifting operations shall be suspended. Do not lift loads when winds create an unsafe or hazardous condition, regardless of wind speed.
- q) When the visibility of the load, riggers, or hoist crew is impaired by conditions such as dust, snow, rain, fog or darkness, lifting operations shall be suspended.
- r) All employees shall be kept clear of loads about to be lifted or suspended loads.
- s) All personnel shall keep hands out of pinch points.
- t) The gross load shall not exceed the dynamic or static capabilities of the lifting equipment. Any load exceeding 80% of the trucks rated capacity shall be considered a ***Critical Lift***.



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31.12 Critical Lifts

- a) Additional precautions shall be taken for operations determined to be Critical Lifts. A critical lift is one in which the dropping, upset, or collision of parts, components, or assemblies, could present a potentially unacceptable risk of personnel injury or property damage.
- b) The designated lift leader in charge of each critical lift shall prepare a Job Hazard Analysis, a lifting permit and a critical lift plan for safe performance of the lift. The critical lift plan and JHA must be communicated to, discussed with, and approved by all personnel involved in the critical lift.
- c) Examples of critical lifts include, but are not limited to:
 - Lifting of Personnel. All lifts of personnel utilizing man baskets must conform to 29 CFR 1926.550(g).
 - Lifting where electric power lines are within twice the maximum swing radius of the gin pole truck, or within the required clearance.
 - Lifting directly over energized or pressurized equipment.
 - The use of two or more trucks to simultaneously lift one load.
 - Lifts exceeding 80% of the trucks capacity.
 - Lifts to be made over normally occupied facilities.

31.13 Lifting Permits

The Lifting Permit must be completed prior to operations using a winch truck, or any lift determined to be a Critical Lift.

- a) Expired Lifting Permits shall be kept on file at the SSS HSE Office for one month beyond their expiration date.
- b) All permit line items shall be completed. Signatures are required on the permit, and all areas requiring signatures, shall have signatures in place.
- c) The load weight should include the weight of the load, the rigging, and any other weight that would affect the gross load.
- d) A Critical Lift Assessment must be performed before every lift. A “YES” response to any of the critical lift questions, requires that the lift leader to perform a Critical Lift Plan.
- e) When eye bolts or other lifting attachments are used, they must be verified to be of sufficient strength, and used in accordance with the manufacturer’s requirements. The name of the individual who has verified the mode of attachment must be entered in the permit.



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- f) During the planning of the lift, if clearances from structures are a concern, an individual must be stationed so they can observe the clearance, and warn of any impending danger.
- g) If the potential exists for people to move into the area of the lift, a person shall be assigned to control access to the area.
- h) During Critical Lifts, a diagram of the lift and rigging must first be prepared.



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32. Near Hit/Potential Hazard Reporting Policy

32.1 Introduction

The SSS Near Hit/Potential Hazard Reporting Policy was developed to provide a method for all SSS Employees to report incidents and/or Potential Hazards that occur in the workplace, which do not result in any personal injury.

32.2 Scope

The SSS Near Hit/Potential Hazard Reporting Policy applies to all SSS Employees.

32.3 Purpose

The SSS Near Hit/Potential Hazard Reporting Policy enhances awareness and establishes methods to communicate a Near Hit and/or Potential Hazard throughout the entire company. All SSS Employees are encouraged and expected to report all Near Hits and/or Potential Hazards as frequently as they occur. Near Hit/Potential Hazard reports are warnings of accidents in the making. If we accept the warnings and look for the causes, we may be able to prevent similar situations from developing. Nothing is learned from unreported incidents. Hazards, causes, and contributing circumstances are lost if not reported. When incidents are not reported, their causes usually go uncorrected. That means they may happen again, perhaps producing tomorrow's accident.

32.4 Required Forms

- The Field Observation Card

32.5 Policy

- a) This Policy covers reporting and recording procedures for all SSS Management, Supervisors, and Employees. No matter how trivial they are, incidents shall be recorded and reported to SSS Supervisors, by utilizing the SSS Field Observation Card.



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- b) Near Hit/Potential Hazard incidents are a warning that should be taken seriously. Report and record “ALL” Near Hit/Potential Hazard incidents to your Supervisor. Reducing the number of Near Hit/Potential Hazard incidents will result in fewer workplace injuries for all SSS Employees. It is vital that you report Near Hit/Potential Hazard incidents before they become accidents with injuries.
- c) Hand written forms shall be recorded in an electronic format.
- d) Distribution of the SSS Field Observation Card is accomplished via paper copy (placed in mailboxes), electronic copy via electronic mail services (both inner company and third-parties), through postings, and verbal discussions at SSS individual/group safety meetings.

32.6 Definitions

- a) **Incident**- means an undesired event that, under slightly different circumstances, could have resulted in personal harm or property damage and/or any undesired loss of resources. An incident is similar to an accident, except that it does not necessarily result in injury, equipment damage, or damage to the environment.
- b) **Near Hit**- means an unplanned event which does not cause injury or damage, but could do so. An event that results in neither injury or property damage, but has the potential to result in injury or property damage if appropriate corrective action is not taken immediately. Examples include: articles falling near to people, short-circuits on electrical equipment, equipment in motion that nearly strikes an individual, etc.
- c) **Potential Hazard**- means a hazard that presently exists and has the potential to cause bodily injury, environmental damage and/or undesired consequences unless corrective actions are taken immediately to either eliminate and/or mitigate the undesirable affects of the hazard.



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32.7 Near Hit /Potential Hazard Guidelines

- a) SSS Employees shall report Near Hit/Potential Hazards immediately to their Supervisor, and completely fill out all the details concerning the incident on the SSS Near Hit/Potential Hazard Form. The potential for such incidents exists throughout the workplace, so all SSS Employees are required to identify them.
- b) If Near Hit/Potential Hazard is a result of an unsafe condition, SSS Employees shall discontinue working until the problem has been corrected, and their Supervisor authorizes them to proceed.
- c) If the incident is a result of unsafe acts, SSS Employees shall be certain that everyone involved has been alerted to their actions and that corrective measures are taken prior to continuation of the job.
- d) SSS Employees shall ensure reporting will include, but not be limited to, Near Hit/Potential Hazard occurrences, unsafe conditions, and unsafe acts. If left unreported, these may lead to a serious accident and injury. Correcting these actions or conditions will enhance the safety within Triple S Trucking, and provide a safe work environment for everyone.

32.8 Key Responsibilities

- a) SSS Management is responsible for ensuring lessons learned from incidents are shared across the company, through the creation and implementation of the SSS Near Hit/Potential Hazard Policy and associated procedures.
- b) SSS Management/Supervisors are responsible for ensuring that actions resulted from investigations to prevent future occurrences, are followed to completion, and that appropriate company resources are allocated.
- c) All SSS Employees are responsible for reporting and documenting all Near Hit/Potential Hazard incidents to their Immediate Supervisor.



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33. Office Safety Policy

33.1 Introduction

Many office Employees mistakenly believe that their place of employment is not dangerous. However, offices can pose a number of hazards, including dangers from falls, floor surfaces, stairs, chairs, filing cabinets, office machinery, sharp objects, chemical exposure or fires.

33.2 Scope

All SSS Employees whose work activities include office work.

33.3 Purpose

The purpose of the SSS Office Safety Policy is to identify some of the more significant office hazards, and ways to avoid them.

33.4 Required Forms

- None

33.5 Identified hazards

- a) Falls are the number one cause of office accidents. Employees may fall while walking, climbing ladders or stairs, or even while sitting in chairs. Employees may trip over telephone and electrical cords, open desk and file drawers, loose and worn carpeting, debris, equipment, or packages left in aisles.
- b) Water from a wet umbrella, floor wax, spilled coffee, or any other substance that makes the floor slippery, can cause falls. Also, office tools, such as pencils and paper clips, can act as skids underfoot.
- c) Studies have shown that the number one cause of stair accidents is distraction. Often Employees simply do not watch what they are doing.
- d) Filing cabinets can cause injuries in a number of unexpected ways.
- e) Word processors, typewriters, duplicating machines, sorters, collators, addressing and mailing machines - all these can grab a finger or a long strand of hair. Rings, bracelets, dangling necklaces, neckties, and loose scarves or sleeves, can add to the hazard potential.



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- f) Fingers and hands turn up on the office injury list more often than any other parts of the body. Little cuts and punctures are not only painful, they can also become infected.
- g) The eyes are an extremely important part of the human body, and are naturally protected by the eyelids and the bony framework surrounding the eyeball. However, when eye injuries do occur they can be devastating. Employees should take precautions and use personal protective equipment whenever there is a risk of eye injury.
- h) Fires are a Potential Hazard in offices and they may have catastrophic effects. Employees shall take precautions and use equipment properly to prevent the risk of fire.

33.6 General office safety guidelines

- a) Good Housekeeping prevents accidents, particularly falls. Good housekeeping is everyone's job.
- b) Sitting down in a chair is a skill that is highly underrated. The proper technique is to look at the chair, grasp the chair arms or the seat with your hand, and then lower yourself into the chair.

33.7 Preventing injuries from falling

- a) Walk, never run.
- b) Don't change direction suddenly, or stop quickly.
- c) Use well fitted footwear with slip-resistant heels and soles.
- d) Keep footwear in good repair. (Flapping soles and broken heels have caused many a fall.)
- e) Carry loads of reasonable size so that your vision is not blocked.
- f) If you see a slipping or tripping hazard, correct it immediately, or mark it and notify someone who can fix the problem.
- g) Keep aisles and walkways clear.

33.8 Preventing injuries on stairs

- a) Always use handrails.
- b) Take one step at a time.
- c) When carrying materials, if you must use stairs, be sure to have at least one hand on the handrail.
- d) Do load both arms with materials
- e) Never carry so much as to limit your vision.



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- f) Do not congregate on stairs or landings, or stand near doors at the head or foot of stairways
- g) Remain alert when using stairs. The risk of a fall increases if talking, or turning to others while going up or down stairs.

33.9 Preventing filing cabinet injuries

- a) Use the handle to close the file drawer- make sure your fingers are not curled over the edge.
- b) In order to prevent the cabinet from toppling over, open only one drawer at a time, and keep heavy materials in the bottom drawer.
- c) Sharp burrs and corners on metal filing cabinets and furniture can cause injuries, as well as clothing tears- correct these conditions immediately.

33.10 Preventing injury from an office machine

- a) Loose clothing and dangling objects (including hair and jewelry) must be secured prior to using word processors, typewriters, duplicating machines, sorters, collators, addressing and mailing machines.
- b) Frayed wiring: Be alert for frayed wiring, especially near the flex point of the plug. Exposed wires can cause shock or start a fire. To reduce fraying and bending of wires, always grasp the plug to pull it out (never jerk the cord); do not bend the cord sharply around an obstruction, or lay it in a travel path.
- c) Three-prong plugs: A three-wire grounding system is a must to eliminate shock hazard. Never use an adapter (“cheater”) to put a three-prong plug into a two-prong receptacle.
- d) If you notice a tingling sensation when touching a machine, or see it smoking or sparking, unplug the machine and immediately report the problem to your Supervisor. Place a sign on the machine to indicate that it is out of order and dangerous.
- e) Even if a machine is in good working order, turn it off before (lock-out/tag-out) before making any adjustments or applying flammable materials.



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33.11 Preventing finger and hand injury

- a) To prevent paper cuts, pick up a sheet of paper by the corner, not the sides.
- b) Uses a letter opener to open envelopes or packages sealed with paper tape. Pull a file out of the drawer prior to reading (don't flip through the contents in the file cabinet).
- c) Keep drawers tidy to avoid punctures from scissors or other hazards hidden under a pile of papers. Keep razor blades, thumbtacks, and other sharp objects in a closed drawer.
- d) Close drawers, doors, and safes with the handle—not with your hand over the top or around the edge. Using the handle is just as easy and prevents a crushed finger.
- e) Use caution when you reach into a drawer for pencils, pens, or other items, to avoid punctures.
- f) Keep pencils stored flat - not standing point up in a pocket or a pencil holder.
- g) Remove staples with a staple remover, not your fingernail. Never test a jammed stapler with your thumb.
- h) Hot light bulbs can reach temperatures over 400°F. Wait for them to cool before touching.

33.12 Preventing eye injury

- a) Keep fluids from splashing and entering the eye by always pouring fluids slowly, and keeping them in tight containers.
- b) Do not rub eyes if any chemical (even carbon paper ink) is on hands-irritation can result.
- c) Be careful with pencils. Do not carry pencils behind the ear. When carrying pencils, keep the point down.



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34. Personal Protective Equipment (PPE) Policy

34.1 Introduction

Whenever possible, hazards shall be eliminated from the work environment; however, it is not always possible to remove all hazards. PPE helps protect SSS Employees from disabling injuries caused by chemicals, heat, temperature extremes, sharp edges, electricity, and moving objects. The SSS PPE Policy identifies the personal protective equipment that is required, and sometimes suggested, to work in any potentially hazardous location in the Triple S Service Facility, or on a SSS remote work location.

34.2 Scope

The SSS PPE Policy applies to all SSS Employees. SSS Employees are required to ensure that SSS customer's employees, third party contractor's Employees, and any persons entering SSS job sites, comply with the standards established in the SSS PPE Policy.

34.3 Purpose

SSS Employees (and other identified persons in the SSS PPE Policy) are required to wear PPE that is appropriate for each job or task. PPE reduces exposure to hazards and Potential Hazards, and includes, but is not limited to, hand, eye, head, foot, ear, and respiratory protection.

34.4 Required Forms

- Certification of PPE Hazard Assessment- must be updated annually, laminated and posted in shops.

34.5 General Requirements

- a) SSS Employees shall always use the Personal Protective Equipment that is appropriate for the task being performed.
- b) SSS Employees shall wear and utilize PPE in accordance with its design specifications, and maintain the PPE in a sanitary and reliable condition, which ensures the effectiveness of the protective equipment.



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- c) All PPE standards established by Federal and State Occupational Safety and Hazard Administration laws, rules and policies are to be considered accepted and enforced as part of this SSS PPE requirement, when applicable.
- d) SSS will provide for SSS Employees at no cost, when necessitated by their work activities, the following approved and appropriate PPE. These items include chemical gloves, aprons, FRC slicker suits, ear muffs or plugs, face shields, full body harness with waist belt and associated lanyards and tie off, safety glasses and safety goggles.
- e) Employee owned PPE is not allowed, except for prescription safety glasses or safety toed boots.
- f) SSS will not provide prescription safety glasses, though an employee may choose to purchase on their own, as long as they meet ANSI Z87.1-1989 standards.
- g) Safety glasses, which can be worn over prescription glasses, will be provided at no cost to an employee.
- h) Wearing side shields with standard prescription glasses is forbidden, as the required level of protection is not attained.
- i) SSS shall not provide nor reimburse employees for safety toed footwear. The footwear must meet ANSI Z41.1-1991 standards.
- j) All PPE owned, worn and/or utilized by an SSS Employee shall be inspected prior to each use and as recommended by the manufacturer.
- k) Any damaged or worn out PPE shall be repaired or replaced immediately prior to use. Replaced PPE shall be destroyed.
- l) When necessary, SSS Employees shall obtain specialized PPE training, including fit testing where required for specific PPE, (e.g. - SCBA).
- m) Any required specialized PPE training shall be conducted by a third party vendor, under the direction of the SSS Safety Department.
- n) SSS Employees shall always use proper PPE to safely perform a job or task, and ensure that it fits correctly, is in good and sanitary condition and is used properly. If necessary, use professional assistance in the selection and fitting process.
- o) Training in the proper use of PPE shall be directed by an SSS competent person.
- p) SSS Employees shall always consult the applicable MSDS for proper PPE requirements, for any chemicals being handled.

34.6 PPE Specifications

- a) Safety toed footwear shall meet all ANSI “Men’s Safety-Toe Footwear” standards (Z41.1-1991). Footwear with worn slick soles, or excessively worn footwear with the steel toe exposed, is not acceptable.



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- b) Due to poor ankle support, “slip on” safety toed footwear is NOT allowed, unless a written medical exception to this is provided. Lace up footwear is instead required, as the chance for ankle injury is greatly reduced from the additional support the lace up style provides.
- c) Hard-hats (plastic) shall meet all ANSI hard-hat standards (Z89.1-1986). The color of the hard-hat to be worn is determined in accordance with the SSS Short Service Employee section.
- d) Eye and face protection must meet all ANSI eye and face protection standards (Z87.1-1989).
- e) Safety glasses shall have side shields and shall meet all ANSI safety glasses standards (287.1-1989).
- f) Prescription safety glasses shall meet ANSI safety glasses standard (Z87.1-1989).
- g) The appropriate safety glasses shall be worn over non-compliant prescription glasses.
- h) The use of contact lenses is not recommended.
- i) SSS shall provide appropriate hearing protection equipment. Employees shall utilize the hearing protection provided, except in cases where an SSS Employee provides hearing protection equipment, which meets or exceeds the SSS hearing protection standard.
- j) Hearing protection equipment should not be shared by employees.
- k) All SSS Employees are encouraged to maintain a clean and professional personal appearance.
- l) No SSS Employees shall wear sleeveless shirts, or clothing that is ragged, oil/grease soaked, or loose fitting.
- m) Unless otherwise specified, protective gloves shall be made of cotton, wool or cotton/wool blends. Protective gloves shall not be made of leather unless conducting, or assisting with, welding or heated materials handling.

34.7 Hard Hat Colors/ Short Service Employees (SSE)

- a) Short Service Employees (green and orange hard hats) shall attend a safety orientation, learn roles and responsibilities, and adhere to: all policies and responsibilities, learn the location and application of all Emergency Response equipment, actively participate in and review JHA's seek assistance and guidance when uncertain, understand the obligation to stop work, wear a hardhat of distinguishing color, and clarify concerns during performance reviews. A mentor shall be assigned to the SSE.



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- b) Green hard-hats shall be worn by all SSS Employees who are newly hired, or transferred within the company, or have less than six (6) months job specific oil and gas service contracting industry experience. SSS Employees required to wear a green hard-hat shall do so for a minimum period of 6 months.
 - c) Green hard hat Employees are required to wear a green hard hat, work accident free for 6 months, complete core safety training requirements, and demonstrate their knowledge and understanding of the HSE tasks and risks associated with SSS employment.
 - d) Supervisors shall conduct and document a performance review at three (3) and six (6) month intervals, to ensure compliance with these requirements.
 - e) Orange hard-hats shall be worn by all SSS Employees who are newly hired, or transferred within the company, and who have more than six (6) months job specific oil and gas service contracting industry experience. SSS Employees required to wear an orange hard-hat shall do so for a minimum period of 6 months.
 - f) Orange hard hat Employees are required to wear an orange hard-hat, work accident free for 6 months, complete core safety training requirements, and demonstrate their knowledge and understanding of the HSE tasks and risks associated with AWS employment. Supervisors shall monitor progress on a daily basis, and conduct and document a performance review at three (3) and six (6) month intervals, to ensure compliance with these requirements.
 - g) The presence of a green or orange hard hat identified short service employee, shall be communicated to the Company on-site supervisor by SSS. Subcontractors SSEs shall also be managed by SSS under the same proceeding procedures.
 - h) White hard-hats shall be worn by all SSS Employees with more than six (6) months SSS employment experience. SSS Employees authorized to wear a white hard-hat shall have worked accident free while wearing a green or orange hard hat, complete core safety training requirements (with documentation on file with their Supervisor), and demonstrate their knowledge and understanding of the tasks and risks associated with SSS employment. Supervisors shall document compliance with these requirements.

34.8 PPE Training, Location and Operation Requirements

- a) PPE training will be covered thoroughly during *New Employee Orientation*, over a course of three days. Training will address: when



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PPE is necessary, how to install, remove, adjust and wear PPE, proper care, maintenance and storage, as well as the limitations of PPE, useful life and disposal.

- b) This training will be certified for each employee, through documented written testing upon completion of the three day course, which shall include coverage of the preceding PPE topics.
- c) Retraining by the SSS Safety department, or a certified third-party, will be performed should changes in the workplace require changes in PPE, to include all topics as covered in a) above.
- d) Hazard assessment to identify PPE requirements, shall be addressed through the Job Hazard Analysis (JHA) program. A JHA is to be completed prior to beginning any task. Any hazards identified which require PPE must be clearly noted, as well as identifying the appropriate PPE to wear. The area supervisor must sign off on the JHA form, and discuss hazards and required PPE with all location employees.
- e) Hard hats shall be worn when outside of a vehicle in the SSS Service Facility yard and/or on any SSS job sites.
- f) Safety-toed boots or shoes shall be worn at all times in the SSS Service Facility yard and/or on any SSS job sites.
- g) Safety glasses shall be worn at all times in the SSS Service Facility yard and/or on any SSS job sites. Specifically, but not all-inclusive, safety glasses shall be worn during hammering, sanding, spray painting, mixing mud, or when an SSS Employee is near someone who is conducting these activities.
- h) Face protector shields are required to be worn when grinding, chipping, buffing, handling chemicals, cutting, and/or while conducting any other operations where flying materials are likely to be present.
- i) Protective gloves shall be worn at all times in the SSS Service Facility yard, and on SSS job sites, during operations including, but not limited to, chemical, equipment and material handling.
- j) Rigger gloves have been shown to provide excellent impact/cut protection, and should be worn whenever these hazards exist. Rubber, vinyl or PVC protective gloves shall be worn when acids, caustic soda and other hazardous chemicals are handled.
- k) Leather protective gloves shall be worn when welding or helping a welder.
- l) Hearing protection shall be worn at all times in the SSS Service Facility yard, and on all SSS job sites during operations in areas designated as having high noise levels (signage required). Additionally, ear protection shall be worn at times when any noise is loud enough to



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require raising your voice in the normal course of conversation, at a distance from one another, of 3 to 4 feet.

- m) A full body harness and associated lanyards are required to be worn and utilized by SSS Employees in the Aztec Service Facility yard, and on all SSS job sites, when an SSS Employee is elevated more than six (6) feet above the adjacent level.
- n) A full body harness and associated lanyards shall be tied off (connected) one-hundred percent (100%) of the time, to proper tie off points when SSS Employees are performing any elevated activity.
- o) Full body harnesses and associated lanyards shall be inspected prior to each use by the Employee wearing the equipment. Any equipment deficiencies shall be reported to their Supervisor immediately.
- p) No Employee, except those authorized to utilize a full body harness and associated lanyards (by an SSS Safety and Environmental Supervisor, Superintendent, Toolpusher or a Crew Supervisor), shall engage in any elevated activity.
- q) Appropriate job specific respirators shall be worn at all times in the Aztec Service Facility yard, and on all SSS job sites during operations including, but not limited to: painting, sand blasting, mud mixing, or chemical handling operations. Note that filter masks should only be used in an open air operation, for the purpose of controlling nuisance dust.
- r) All PPE shall be stored properly, to ensure it is kept clean and usable for the next time it is required, by yourself, or others. Any stored PPE found in unfit condition, must be immediately replaced, and communicated to your supervisor

34.9 Fire Resistant Clothing (FRCs) – Safety, Employee Responsibility, Cleanliness and Care

- a) Fire Retardant Clothing (FRC) shall be worn at all times while on well site locations (new and pre-existing).
- b) Fire Retardant Clothing shall be worn so that full body coverage is obtained, with the sleeves rolled all the way down to the wrist, and pant legs rolled all the way down to the ankle.
- c) FRC shirts must always be fully tucked into pants. They must be buttoned up to within one button from the collar button (the collar does not have to be buttoned).
- d) FRC shall be kept clean and free of excessive grease or oil. Tears or holes must be promptly repaired, so the flame protection is not compromised.



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34.9.1 Employee Responsibility

- a) There is no cost to the employee, if you stay under SSS employ, for 90 days or more after issuance.
 - 1) When issued FRCs, each employee is responsible for their cost IF THEY DO NOT STAY UNDER SSS EMPLOY FOR AT LEAST 90 DAYS AFTER RECEIPT OF ANY FRCs.
 - 2) Should the employee no longer be employed by SSS within that 90 day first issuance period, then the cost of FRCs issued- **within less than the past 90 days-** WILL BE TAKEN OUT OF THE EMPLOYEE'S LAST PAYROLL CHECK. **Turn-back of FRCs- once issued- is NOT ALLOWED.**
 - 3) Should an employee cease to be employed by SSS after 90 days of issuance, then the employee will not be docked for FRCs issued more than 90 days prior.
- b) Damaged FRCs, no longer safe for wear, shall be replaced by SSS upon submission of the damaged FRCs. For any replacement FRCs, the 90 day employee responsibility cost period, begins over again, starting on the date each replacement item was issued. After 90 days, the employee is not responsible for the cost of replacement FRCs.

34.9.2 Cleanliness and Condition-

- a) FRCs are designed to reduce damage to your skin in the case where you may be exposed to fire.
- b) **MAXIMIZE SAFETY:**
 - 1) In order to maximize safety, it is important that you keep your garment clean.
 - 2) **Flammable residue in or on the garment (such as petrochemicals- fuels or oils) may ignite and cause injury.**
 - 3) Avoid wearing flammable synthetic underneath your fire resistant clothing, as transfer heat may cause these to melt, causing severe skin injury.
 - 4) Discontinue the use of damaged garments immediately, and have them repaired before further usage.



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34.9.3 Care Instructions:

- a) In order to ensure optimal performance of the safety product you have purchased, it is important to properly care for the product. The following instructions must be followed strictly in order to maintain the protective characteristics of your garment.
- 1) Do not use detergent containing organic/tallow soap
 - 2) Do not use chlorine bleach
 - 3) Do not use acidic additives in the rinse process (sour rinse)
 - 4) Avoid direct and intense steam while ironing
 - 5) Avoid over drying; recommended moisture retention is 10-15%
 - 6) Store under dry conditions; avoid direct sunlight on stored FRCs
 - 7) WASH GARMENT AT LEAST ONCE A YEAR
 - 8) NO SODA ASH
 - 9) NO HOT WATER- Maximum water temp is 140F
- b) **CAUTION:** Single layer products made with ANTIFLAME fabrics are not intended to provide protection from extreme heat, or flame exposure of long duration. Appropriate fabrics and multi-layer garment constructions should be used if you require extra protection. ANTIFLAME cotton products are not intended for use in turnout clothing, for structural firefighting. ANTIFLAME fabrics are resistant to some chemicals, but do not provide chemical protection.
- c) ANTIFLAME fabrics will not ignite, and will provide a limited degree of heat and flame protection for the lifetime of the garment, **provided that the care instructions are followed.**



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35. Progressive Discipline Policy

35.1 Introduction

SSS has a strong history of trust and compliance with certain expectations and standards for performance and behavior, but occasionally there are situations where Management must intervene to coach, guide, and sometimes discipline Employees, so that more positive, productive and safe behaviors and performance may be demonstrated. It is important for our Employees to know how such situations may be handled, so that, if discipline is administered, it is done so in a responsible manner.

35.2 Scope

The Triple S Trucking Company Positive Reinforcement and Progressive Discipline Procedure will apply to all hourly and salaried Employees.

35.3 Purpose

The purpose of the SSS Positive Reinforcement and Progressive Discipline Policy is to promote the safe and efficient operation of Triple S Trucking Co. business, and to ensure the security and well being of all Employees.

35.4 Required Forms

- SSS Disciplinary Action Form

35.5 Policy

There is no formal review or hearing process with regard to terminations. Any terminated Employee may contact Jerry Sandel, Jason Sandel or Stewart Peterson to discuss the basis for their termination.

35.6 Definitions

- a) **Informal Coaching** – Involves a two-way discussion with the Employee of the performance or behavior that needs to be corrected, and ways the Employee can improve his or her behavior and/or performance. Coaching may be in conjunction with an Advanced Safety Audit.



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- b) **Verbal Warning** – The Employee is formally warned that his or her performance and/or behavior is not acceptable. Failure to improve the performance or behavior may result in further disciplinary action, up to and including termination.
- c) **Written Reprimand** – The Employee is formally notified in writing that failure to correct the performance or behavior will result in further disciplinary action, up to and including termination. The letter references any past discussions held with the Employee concerning his or her performance, and the specific instances when he/she has failed to perform or behave in an acceptable manner.
- d) **Investigative Suspension** – A period of time, not to exceed five working days, during which an Employee is relieved of his or her job because of alleged serious misconduct. An Employee may be placed on investigative suspension when it is necessary to make a full investigation to determine the facts of the case. Depending on the outcome of the investigation, the Employee will either return to work and be paid for time off, or receive the appropriate level of discipline, up to and including termination.
- e) **Disciplinary Suspension** – If an Employee's actions are so egregious as to require severe disciplinary action and removal from the work place, or if she/he has failed to improve upon unacceptable performance or behavior, the Employee is formally notified in writing of a one to five day suspension with or without pay, and warned that any further violation of Company policy, expectations, or rules may result in termination.
- f) **Crisis Suspension** – A crisis suspension is given at the discretion of Management when action must be taken immediately. This type of suspension is to be used when there is a threat to personal safety or other serious and immediate concerns.
- g) **Termination of Employment** – The Employee is formally notified in writing at the time, or immediately following the termination, that his or her continued failure to correct unacceptable performance or behavior has led to termination, or that his or her actions were so egregious as to merit immediate termination. Supervisors and appropriate levels of Management must first be consulted prior to terminating an individual.



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35.7 General requirements

General requirements of a positive reinforcement and progressive discipline process are to: 1) recognize and reward positive behaviors, 2) provide intervention when non-compliance with company standards, policies and/or procedures is an issue, 3) administer needed discipline in a fair and consistent manner, and 4) assure proper documentation.

35.8 Key responsibilities

It is the responsibility of all Employees to strive to ensure a safe working environment, and to commit to perform job requirements in an efficient manner. The Triple S Trucking Co. Positive Reinforcement and Progressive Discipline Procedure, requires effective and open communication between Supervisors and Employees, and a mutual understanding of standards and expectations of job performance.

35.9 Positive reinforcement and recognition process

- a) Positive Reinforcement and Recognition is a philosophy that emphasizes Employee responsibility for his or her own behavior, and recognizes that Employees respond positively when treated as mature and responsible people. The key components of the process include recognizing and encouraging good performance, building commitment for high work standards and safe work practices, and correcting performance problems through coaching, before they become unmanageable. Positive Reinforcement and Recognition focuses on personal and non-threatening communication between Supervisors and Employees, to clarify performance expectations. Triple S will utilize positive Reinforcement and Recognition as the primary means to shape behaviors.
- b) It has been proven that regular and consistent use of positive reinforcement, increases the speed at which behaviors are adopted, and the duration behaviors are demonstrated. Celebrating successes, saying “good job” or “nice work doing that safely”, verbal recognition in front of peers, sharing examples of positive behavior across groups noting Employee names and describing actions, monthly awards for the most positive HSE performance, are some of the many habits that we all should develop to enhance teamwork and foster safe and productive behaviors. Action and monetary rewards are all examples of how positive reinforcement can be utilized.



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35.10 Progressive discipline process

35.10.1 Background

- a) In order to provide some grounding for any disciplinary process, expectations for behavior have been set. New rules, standards, procedures and policies may from time to time, be established and communicated to Employees. Principles for conduct also arise from commonly accepted standards of behavior, necessary for achieving harmony and goodwill in the work place. All Employees should understand and live by the basis on which we do business, as well as the rules, standards, procedures and policies, which prescribe the acceptable behaviors for our workplace. Violation of these rules, standards, procedures, policies, and principles of behavior, may result in disciplinary action, up to and including termination.
- b) Additionally, unacceptable performance, disruptive behavior, and/or absenteeism problems, among other things, may warrant handling as a disciplinary issue. Determining the severity of a disciplinary situation, as well as determining the appropriate corrective measures, will be the responsibility of the Supervisor, in consultation with Management. In some circumstances, the process of progressive disciplinary action will result, beginning with verbal discussions and continuing through written reprimands, suspensions with or without pay, and ultimately, termination. **Under certain circumstances, however, any disciplinary situation may result in bypassing some of these progressive steps or in an Employee's immediate discharge.**
- c) No disciplinary action should be taken before informing Employees of any allegations that they have infringed Company rules, standards, policies or procedures, or have failed to satisfy the standards of conduct or performance expected of them. Every effort should be made to investigate and establish all facts relevant to the case in a fair and expeditious manner. Management should be consulted during the process to assure that the investigation, and any disciplinary action, is handled appropriately and consistently.
- d) Following are the normal steps that will be followed for most situations requiring intervention. **Depending on the circumstances, one or more steps may be skipped. The fact that the Supervisor or Management has or has not utilized any of these steps in the disciplinary procedure, does not set any precedent, and should not be relied upon in future disciplinary situations by any Employee.**



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35.10.2 Coaching for performance enhancement

- Informal Coaching – This type of two-way communication is used frequently in day-to-day business, and is a method of helping an Employee to further develop his or her skill and abilities, and to help them recognize and correct certain aspects of work performance. It can be used for correcting infractions of a minor rule or policy when the rule or policy is new and/or the Employee is new or recently transferred. It may be used more than once for the same individual, before more serious action is required, and may be in conjunction with performing a “SSS” Field Observation, or similar behavior safety audit (i.e. - Advanced Safety Audit, STOP Audit, and B/Safe Audit).
 - Examples of situations or violations that could warrant coaching for performance enhancement include but are not limited to: 1) not using personal protective equipment, adhering to safety policies, failure to follow recycling guidelines or operating procedures, etc. This would apply to a first infraction that appears to be an oversight rather than a deliberate violation of a rule; 2) Improperly filling out JHA’s, etc., through carelessness, and without intent to falsify; 3) negative behavior, being argumentative, or constantly complaining about the job, without providing ideas for improvements.

35.10.3 Levels of progressive discipline

1) Verbal Warning –

A verbal warning is used when constructive feedback from coaching for minor infractions has failed to correct the problem, or where the violation is more serious, although still not a major infraction. The verbal warning will be recorded and placed in the Employee’s personnel file and copied to the individual. The record shall be kept in the Employee’s personnel files for three years, then purged, providing no further disciplinary action is required.

- Examples of situations or infractions that could warrant a verbal warning include, but are not limited to: 1) not using personal protective equipment, disregard for safety policies, etc., through oversight after having been recently reminded to do so, 2) failure to follow waste handling guidelines through oversight, 3) neglect of duty or unsatisfactory performance versus job requirements, 4) failure to use seat belts when driving a company vehicle, or on company business.



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2) Written Reprimand –

A written reprimand is a formal letter given to an Employee for repeated minor infraction or for a first infraction serious in nature, or a rule, standard, procedure or policy. The written reprimand should state what was wrong, why it was wrong, and what positive action, if any, Management is taking, the required change in behavior, and possible consequences if the Employee fails to change his or her behavior. The written reprimand will be placed in the Employee's personnel file, where it will remain for a period of three years, providing no further disciplinary action is required. Action should be proposed by the Supervisor(s) and agreement obtained from the next level of supervision, in consultation with Management. If necessary a more detailed corrective action plan should also be agreed to, and signed by the Employee.

- Examples of infractions, which could warrant a written reprimand include, but are not, limited to: 1) deliberate violation of a Triple S Trucking Posted General Rule, Triple S Trucking Safety Standard, or Triple S Trucking written policy, 2) aggressive or abusive behavior towards others, e.g. - disrespectful behavior, provoking horseplay, provoking a fight, threats, 3) failure to use the proper personal protective equipment after repeated reminders, 4) a temporary refusal to follow Supervisory instructions or reasonable requests; temporary insubordination. (Note: a real concern for one's safety may be a viable mitigation circumstance.)



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3) **Suspension** –

This action should be taken only when the violation or continued inappropriate behavior, is of such a serious nature that a genuine question regarding the continuity of the Employee's employment exists, or if the intent is to give the Employee time off with or without pay, due to the seriousness of the unacceptable behavior. The ultimate outcome can be determined only after a thorough investigation and consultation is completed. This action is not permanent, but is only temporary under circumstances in which the Employee's presence in the workplace is unwanted. Consultation with appropriate upper level personnel and/or Management is required. An Employee may be suspended when:

- a. There was deliberate violation of a Triple S Trucking Posted General Rule, Safety Standard, or written policy that did cause, or might have caused, a serious injury or incident.
- b. The Employee is judged to be impaired, or potentially impaired to such an extent that Management has a reasonable concern regarding the Employee's capacity for working safely. This may arise as a result of alcohol, drugs, emotional instability, disruptive behavior to the point that work is being impeded, etc.
- c. **The Employee fails to immediately report to his or her Supervisor an injury or illness, spill, or other reportable incident, regardless of the loss, injury or damage sustained.**
- d. The Employee engages in a cover-up of any HSE infraction.
- e. The Employee is absent from duty, without notice to and permission from, the Employee's Supervisor.
- f. The Employee demonstrates excessive absenteeism or inordinate attendance problems, including but not limited to, reporting late and leaving early.
- g. There is potential for termination, pending results of subsequent investigation.
- h. Management has reliable information that the Employee has committed a major violation of rules or was involved in major destruction of property or product.
- i. The Employee has been involved in other disciplinary contacts, without achieving the desired behavioral or performance improvements.



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4) Termination –

Employment for Triple S Trucking Company Employees is “at will”, meaning that an Employee may terminate employment voluntarily at any time without notice or without reason. Without limiting the rights of Management to terminate an at-will Employee for any reason, Supervisors may consider termination of an Employee, when efforts to correct his or her performance have been unsuccessful, the Employee violates an important rule, standard, procedure or policy, or when the infraction is so dangerous to the site or its Employees, that Supervisors feel that they cannot accept the risk of the continuation of this person’s employment. Examples of infractions that could warrant termination include, but are not limited to:

- a. Possessing unauthorized firearms, explosives, or weapons.
- b. Fighting or attempting or threatening bodily injury to another during working hours, or on Company property or job sites.
- c. Conduct that violates the common decency or morality of the community.
- d. Mischievousness, carelessness, or neglect that is or could be conducive to personal injury, or the destruction or damage to property.
- e. Disclosing proprietary or confidential information of the Company without authority, or misusing such information outside the scope of an Employee’s assigned job duties.
- f. Failure to follow, implement, or utilize applicable safety guidelines, practices, policies, procedures or rules.
- g. Supporting, encouraging, or soliciting others to circumvent or violate established work or HSE standards, procedures, policies or regulations.
- h. Theft of money or property belonging to the Company or others.
- i. Unauthorized possession of Company tools, materials, or equipment.
- j. Insubordination, including refusal to perform work assigned, or to follow instructions.
- k. Failure to implement safe practices.
- l. Behavior or utterances that could be construed as threatening toward others in the work place.
- m. Refusing to cooperate, or making false statements, in connection with any Company authorized investigation or search.



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- n. Making false statements in connection with Applications for employment, or in connection with medical examinations.
- o. Falsifying or misrepresenting records or reports, either written or oral.
- p. Failure to report and account, in accordance with instructions, for all monies, materials, and equipment.
- q. Fraudulently obtaining money, materials, or property from the Company, its Employees, or those with whom it does business.
- r. Sleeping during working hours.
- s. Violation of the SSS Drug Policy.
- t. Violation of the SSS EEO Non-Discrimination and Non-Harassment Policy.
- u. Inappropriate use or misuse of Company computing facilities, including PC's, laptops, e-mail, etc., including but not limited to, any violation of SSS policy pertaining to internet access.



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36. Respiratory Protection Plan

36.1 Management of Respirator Program

The Safety Department is responsible for updating and administering all aspects of this plan. In addition, the Safety Department shall carry out periodic review and evaluation of the effectiveness of the plan.

36.2 Purpose

Additionally, as a condition of your employment at SSS, all new employees will complete an SSS pre-employment Respirator Medical Evaluation Questionnaire, and must pass a pulmonary function test. The reason for this questionnaire is to determine, should your job duties require, your ability to wear a dust mask.

After a thorough and careful review of the OSHA 1910.134, as it relates to a respiratory protection program, we have determined that Triple S Trucking Employees, on a normal operation, are not exposed to any items which require personal protective respiratory equipment, more significant than a NIOSH rated N-95 dust mask.

In the case of handling caustic soda, it has been determined that certain particulates could be damaging, and thereby require the use of an N-95 dust mask in accordance with the MSDS. As per SSS Hazard Communication Program, SSS Employees have access to all MSDS's.

Note: SSS does not allow handling of any chemical that requires the use of any respiratory protection greater than an N-95 dust mask, without Safety Department, Supervisor or Sr. Management approval, which will include appropriate training for fit and use.

36.3 Required Forms

- Respiratory Medical Evaluation Questionnaire



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36.4 Basis for Selection of Respirators

- a) Respirators shall be chosen based on job description, identification and evaluation of hazard, and in accordance with the NIOSH Respirator Decision Logic.
- b) Certain job descriptions will require the use of respiratory protection.
- c) Hazard identification shall include a review of the chemicals in use with respect to their hazards, the availability of respirators for the chemical, and the potential of exposures.
- d) If any air monitoring has been done to determine the level of exposures, this data will be considered in respirator selection.
- e) Only NIOSH approved respirators shall be used. Replacement Parts and cartridges shall be used only with the mask for which they were intended. Any mixing and matching negates NIOSH approval.
- f) If there is any doubt about the appropriateness of a respirator for a particular exposure, or about NIOSH approval of a particular respirator, advice will be obtained from NIOSH. The job will be stopped until the issue is clarified.

36.5 Medical Testing

- a) Persons will not be assigned tasks requiring the use of respirators, unless they are physically able to perform work and use the equipment.
- b) The respirators user's medical status shall be reviewed, as required by OSHA.

36.6 Fit Testing

- a) Each individual who must wear a respirator shall be fit tested by a qualified individual, and a respirator which fits each individual shall be made available.
- b) The individual shall be given written notification of the brand and model which he or she can wear.

36.7 Cleaning and Disinfection

- a) All respirators must be cleaned after each use (shift).
- b) Place the clean respirator in a new plastic bag and seal it for storage.



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36.8 Inspection

Respirators shall be routinely inspected before and after each use, and during cleaning.

36.8.1 Air-purifying respirators including dust masks

➤ **Rubber face piece**

1. Dirt- clean the mask.
2. Cracks, tears, or holes- obtain a new face piece.
3. Distortion- allow face piece to sit free from any constraints and see if distortion disappears. If not, obtain a new face piece.
4. Cracked, scratched, or loose fitting lenses- contact manufacturer to see if replacement is possible. Otherwise, obtain a new face piece.
5. Inflexibility of rubber face piece- replace face piece.

➤ **Head straps**

1. Breaks or tears- replace head straps.
2. Losses of elasticity- replace head straps.
3. Broken or malfunctioning buckles or attachments- obtain new buckles.
4. Excessively worn separations on the head harness which might allow the face piece to slip- replace head strap.

➤ **Inhalation and exhalation valves**

1. Detergent residue, dust particles or dirt on valve or valve seat- clean residue with soap and water.
2. Cracks, tears, or distortion in the valve cover material or valve seat- replace valve cover. Contact the manufacturer for instructions on valve seat replacement.
3. Missing or defective valve cover- replace valve cover; obtain from manufacturer.



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➤ **Filter elements**

1. Appropriate for hazard and approved.
2. Missing or worn gaskets- replace gaskets.
3. Worn threads on filter and face piece- replace filter or face piece as appropriate.
4. Cracks or dents in filter housing- replace filter.
5. Deterioration of gas-mask canister harness- replace harness.
6. Check end-of-service-life indicator, if present, and expiration of shelf-life date on cartridge or canister.

36.8.2 Supplied air respirators

If there is a tight-fitting face piece, use the procedures for air-purifying respirators, except those pertaining to the air-purifying elements. If the device has a hood, helmet, blouse, or full suit:

1. Examine the hood, blouse, or suit for rips, tears, and seam integrity.
2. Examine the protective headgear for general condition, with emphasis on the suspension inside the headgear.
3. Examine the protective face shield, if any, for cracks, or breaks, or impaired vision.

Note: Supplied air respirators are currently not being used at Triple S Trucking.

36.8.3 Self-Contained breathing apparatus (SCBA)

SCBA shall be inspected monthly and after each use. In addition to the above:

1. The high pressure cylinder of compressed air is fully charged.
2. On closed circuit SCBA, a fresh canister of carbon dioxide absorbent is installed.
3. On open circuit SCBA, recharge the cylinder if less than 80% of the useful service time remains.
4. Regulator and warning devices are functioning.
5. Tightness of connections.

Note: SCBAs are not currently being used at Triple S Trucking.



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36.9 Storage

- a) Clean respirators shall be stored to protect them against dust, sunlight, heat, extreme cold, excessive moisture, or damaging chemicals.
- b) Respirators shall be stored in resealable plastic bags in a convenient, clean and sanitary location. Masks shall be stored in a single layer, with the face piece and exhalation valve in a more or less normal position, to prevent the rubber or plastic from becoming permanently distorted.
- c) Cartridges, when applicable, shall be stored in the same location, but not attached to respirators. They shall be segregated by type.

36.10 Maintenance and Repair

Maintenance and repair shall only be done by experienced, qualified persons, with parts designed for the respirator.

36.11 Provisions for Supplied Air Respirators

- a) Compressed air shall meet the requirements of the specification for Grade D breathing air, described in Compressed Gas Association Commodity Specification G-7.1-1966.
- b) Cylinders shall be tested and maintained as prescribed in the Shipping Container Specification Regulations of DPT (49 CFR Part 178).

Note: Supplied Air Respirators are not currently being used at Triple S Trucking.

36.12 Training

All employees who use respirators shall be instructed in:

- a) The importance of correct selection and use of respirators.
- b) Correct use and consequences if improper use.
- c) Care and storage.
- d) How to achieve a proper fit each time a respirator is donned.
- e) Limitations of respirators.
- f) Demonstration and practice in how a respirator should be worn, how to adjust it, and how to determine if it fits properly.
- g) Cleaning, inspection, repair and storage, so they can judge if their respirators have been appropriately treated.



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- h) Employees responsible for cleaning and inspection shall be instructed in how to conduct these operations.
- i) Frequency- Training shall be conducted initially, when it is determined that an employee can and shall wear a respirator, and whenever a non-user becomes a user.
- j) Refresher training shall be conducted periodically.

Note: Triple S Trucking is currently not using Air-Line Respirators.



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37. Site Security Policy

37.1 Introduction

SSS and SSS Employees cannot ensure that SSS work locations are always safe and secure, without a site security policy. The Site Security Policy seeks to assist SSS Employees in ensuring safe and secure working locations.

37.2 Scope

The SSS Site Security Policy applies to all SSS Employees.

37.3 Purpose

The purpose of the SSS Site Security Policy is to assist SSS Employees in identifying items to look for, with regard to ensuring a safe and secure work location. Ultimately, the SSS Site Security Policy is another tool for SSS to extend our commitment to help protect the health and safety of SSS Employees, the community in which we live, and the environment.

37.4 Required Forms

- None

37.5 Observations

- a) SSS Employees should always take notice of any strange vehicles, people, or operations on the route to the SSS Service Facility and SSS remote work location. SSS Employees should look for things such as: vehicles parked in the wrong place or around equipment, people not wearing proper PPE or smoking, building a fire, handling equipment, or drinking or using drugs.
- b) Employees should attempt to identify operations being conducted.
- c) SSS Employees should always take notice of equipment, and the general condition of a work location, to assure the location remains in the condition it was left in. SSS Employees should pay particular attention to trash, a track indicating a person has been on location, and signs of operations being/ conducted without proper notification.
- d) SSS Employees shall always be aware of any people coming near an SSS work location, and their activities.



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37.6 Actions

- a) If an SSS Employee observes any security breaches, the Supervisor shall be notified immediately.
- b) If an SSS Employee observes any unexpected activity on the work location, or if an improper activity (without approval, without proper identification or otherwise illegal activity) is occurring off location, the SSS Employee shall immediately contact the local Sheriff's office (call 911 if needed).
- c) SSS Employees reporting security breaches shall document their report in the SSS daily time ticket, or on another piece of paper, noting the 1) location, 2) time, 3) date, 4) witnesses, 5) general description of the security breach, and 6) to whom it was reported. SSS Employees reporting a security breach shall provide a copy to an SSS Safety and Environmental Supervisor, and should retain a personal copy.
- d) SSS Employees shall never "take matters into their own hands" in a confrontational way, with any persons attempting to improperly enter a work location, or interfere with SSS work activities. In circumstances where persons are attempting to improperly enter a work location or interfere with SSS work activities: SSS Employees shall immediately stop any operations that are deemed to be unsafe or hazardous to an entrant (e.g. - proper PPE is not being worn); notify the local sheriff's office or other law enforcement personnel (call 911 if needed); and subsequently notify a SSS Safety and Environmental Supervisor.
- e) All security breaches shall be discussed with work location authorized entrants upon arrival on location, and shall be discussed with the appropriate SSS customer personnel.



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38. Spill Prevention Control and Countermeasure (SPCC) Policy

38.1 Introduction

The SPCC program is administered by the United States Environmental Protection Agency, under the authority of the Clean Water Act and the Oil Pollution Prevention Act. The federal program establishes procedures, methods, equipment and other requirements to prevent the discharge of oil from non-transportation related onshore (and offshore) facilities into the “navigable waters” of the United States.

38.2 Scope

SSS believes SPCC regulations apply to the SSS Service Facility and remote SSS work sites, in that a release from the SSS Service Facility, or in some cases from remote SSS work locations, could reasonably be expected to discharge oil into “navigable waters” of the United States, as SSS does transport containers with an oil storage capacity greater than an amount specified by laws.

38.3 Purpose

The purpose of the SSS SPCC Policy is to prevent potential environmental damage from any discharges of oil into the environment from the SSS Service Facility or by an SSS Employee. Additionally, the SSS SPCC Policy is intended to educate SSS Employees about SPCC regulations and requirements, so as to provide for SSS Employee assistance and understanding, in cases where SSS Employees work on or near SSS customers’ facilities, which are subject to SPCC regulations.

38.4 Required Forms

Any reportable spills or discharges of oil shall be reported to appropriate regulatory authorities, in accordance with applicable local, state and federal laws, rules and regulations on the forms, and in a manner, required by those laws, rules and regulations.



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38.5 Duties and Plan requirements

- a) An SSS Safety and Environmental Supervisor, or his or her designee, shall act on behalf of SSS Management in developing and implementing an SPCC Plan, as required by the SPCC Program. The plan must include a written description of the SSS Service Facility's compliance with SPCC requirements, designed to prevent oil releases into navigable waters.
- b) An SSS Safety and Environmental Supervisor, or his or her designee, shall ensure all equipment used to transport and store oil is sized to accommodate any expected volumes of oil. Additionally, the equipment must meet general engineering design practices, such as using welded steel tanks to store oil.
- c) An SSS Safety and Environmental Supervisor, or his or her designee, must ensure the SSS Service Facility design includes spill containment and/or diversionary structures (e.g. - earthen berms or containment curbing around tanks or other equipment) that are designed to prevent oil from reaching "navigable waters". These prevention measures must be built to contain the storage capacity of the largest single tank and to allow sufficient freeboard for any rain or snow. Any containment berm drain line must have a valve that is normally locked in the closed position. Other containment structures such as retaining walls, curbing, culverts and gutters, and retention areas can be used. If adequate containment is not practical, the SPCC Plan must include a strong oil spill contingency plan and a written commitment of manpower, equipment and resources, to expeditiously respond to a spill.
- d) An SSS Safety and Environmental Supervisor, or his or her designee, must periodically instruct personnel in the operation and maintenance of equipment, to prevent oil discharges, and to ensure compliance with pollution control laws and regulations.
- e) An SSS Safety and Environmental Supervisor, or his or her designee, must review, evaluate and update (if necessary) the SSS SPCC Plan every three years, and he or she must ensure that copies of the SSS SPCC Plan, inspection and training records are maintained at the SSS Service Facility (inspection and training must be maintained for five years).



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38.6 Employee duties and recommendations

- a) No SSS Employees shall intentionally cause any spill of any oil, oil related or chemical materials at the SSS Service Facility, or at any SSS remote work location.
- b) SSS Employees shall be knowledgeable and have understanding of the operation and maintenance of SSS equipment and storage apparatuses, to prevent oil discharges.
- c) SSS Employees shall be knowledgeable and have understanding of applicable pollution laws, rules and regulations as described by the SSS Environmental Management System.
- d) SSS Employees working in the SSS Service Facility, or on or around trucks or tanks, shall ensure that the truck or tank is positioned or located, so that the risk of discharge or spill of oil and oil related products reaching “navigable waters” is minimized.
- e) SSS Employees working in the SSS Service Facility, or on or around any undiked areas (e.g., pumps, tanks, cellar and pits), shall ensure that the area is controlled by a ditch or berm, leading to secondary containment or a reserve pit.
- f) SSS Employees working in the SSS Service Facility, or on or around trucks or tanks, shall ensure that primary containment devices are installed properly, and are of sufficient design to control expected pressure.
- g) SSS Employees working in the SSS Service Facility, or on, or around trucks or tanks, shall make every effort to prevent any petroleum products from leaving the primary containment, and from reaching “navigable waters”, especially in areas or periods of heavy rain or flood.
- h) In the event of a spill, SSS Employees working in the SSS Service Facility, or on or around trucks or tanks, shall attempt to contain the spill by building a secondary basin or a diversionary structure; whichever is appropriate at the time. Spills shall be reported to an Immediate Supervisor. Supervisors shall notify the Manager, and the Manager shall notify an SSS Safety and Environmental Supervisor and the owner of the well (or their authorized representative). The Manager shall request that the owner, or their authorized representative, provide such equipment as is necessary to build structures to contain the spill.
- i) All SSS trucks over 10,000 lbs, GVW, shall be equipped with a Universal 5 gallon spill kit. This spill kit shall, at a minimum, include (10) heavy weight absorbent pads, (2) 3" x 48" universal absorbent socks, (2) 9" x 18" universal absorbent pillows, (1) pair green nitrile



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- gloves, (1) pair goggles and (1) disposal bag. The spill kit will be mounted on each truck so that it is easily accessible.
- j) Training, use of the Spill Kit, and proper response and notifications will be covered under the annual SSPC and Incident Notification training programs.
 - k) SSS Employees working in the SSS Service Facility, or on or around trucks or tanks, shall make every effort to ensure all third party equipment used to transport and store oil, is sized to accommodate any expected volumes of oil.

38.7 Supervisor's additional responsibilities

- a) SSS Supervisors shall display exemplary leadership through full compliance with SSS rules, policies and procedures.
- b) SSS Supervisors shall pro-actively lead and coach employees in the safe performance of their duties.
- c) SSS Supervisors shall check for and eliminate identified and unidentified hazards.
- d) SSS Supervisors shall conduct work and equipment related audits.
- e) SSS Supervisors shall assist all Employees by training in procedures, job proficiency, and application of SSS rules and policies.
- f) SSS Supervisors shall facilitate Employee HSE meetings to encourage maximum Employee, third party vendor and SSS customer participation and input.
- g) SSS Supervisors shall conduct appropriate follow-up, and/or ensure SSS Employee follow-up, on ideas and action items identified in all SSS HSE meetings.
- h) SSS Supervisors shall immediately take appropriate steps to eliminate recognized hazards, and ensure corrective action is completed on unsafe conditions, physical hazards or environmental threats identified on the Triple S Service Facility, or remote work location operations, and take appropriate steps in reducing or controlling any hazards that cannot be eliminated.
- i) SSS HSE Supervisors shall maintain current inventories of all chemicals at the work location, and maintain current copies of associated MSDS information, ensuring that an HSE Supervisor has been notified about any new chemicals at the work location, in accordance with the SSS Hazardous Communication (HAZCOM) Policy. SSS HSE Supervisors shall ensure that the MSDS Manual has been updated.
- j) At locations where chemicals are used or stored good housekeeping is of primary importance. Employees are to keep chemicals well organized, neatly stored, labeled and when not in use within a



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secondary containment system. Chemicals when in use can be removed from this area, but, should be returned to storage area upon completion of use. No chemicals are to be left unattended during use.

- k) SSS Supervisors shall ensure all SSS Employees follow established rules and policies.
- l) SSS Supervisors shall emphasize HSE leadership, and participate in all required HSE meetings.
- m) SSS Supervisors shall ensure proper notification upon any accident or incident occurring, and ensure proper recording of the incident and/or accident in accordance with the SSS Incidents, Accidents, Injuries and Illnesses Policy.



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- n) SSS Supervisors shall require, utilize and monitor the ongoing use of the SSS JHA Program, as a planning tool in accordance with the SSS JHA Policy.
- o) SSS Supervisors shall require, utilize and monitor the ongoing use of the SSS Field Observation Card Program, as a hazard identification tool in accordance with the SSS Field Observation Program Policy.
- p) SSS Supervisors shall actively promote the “SSS” Behavioral Safety Program by conducting frequent observations of Employee work practices, in accordance with the “SSS” Behavior Safety Observation Policy.



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39. Vehicle Policy

39.1 *Introduction*

When an Employee drives an SSS provided vehicle or a rented vehicle on company business, he or she has important responsibilities, and must comply with all applicable laws and safety standards. This Driver Safety Program Policies and Procedures Section (the “Vehicle Policy”) sets forth the important responsibilities and safety standards, that must be met by any person operating an SSS company provided vehicle.

For the purposes of this Policy, Employees who drive company-provided vehicles, including vehicles provided for the purpose of vacations (“Fleet Vehicles”), will be referred to as “Fleet Drivers.” Employees who drive rented vehicles on company business will be referred to as “Company Drivers.”

The success of our Driver Safety Program depends upon the sincere, constant, and cooperative effort of all of our drivers. In addition to this Policy, Fleet Drivers must read and comply with the Fleet Program Policies and Procedures. Company Drivers must read and comply with the Business Use of Rental Car Policies and Procedures.

Any questions concerning the policies or your responsibilities should be referred to your supervisor, or the Safety Department.

39.2 *Scope*

The SSS Vehicle Policy applies to any SSS Employee, or other person, operating an SSS provided vehicle.

39.3 *Purpose*

The primary goal of the Driver Safety Program is to prevent and minimize automobile accidents and related deaths, injuries, and property damage, while controlling the significant costs resulting from accidents.

Fleet Drivers and Company Drivers must follow the requirements outlined in these pages. Policy violations may result in strong disciplinary action, up to and including revocation of driving privileges, and termination of employment.



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Drivers must comply with all applicable local, state, and federal motor vehicle regulations, laws, and ordinances.

39.4 Required Forms

- MVR Authorization/Disclosure form
- Use of Company Vehicle Policy

39.5 Fleet Vehicle Use

- a) The privilege of driving a Fleet Vehicle, or a rental vehicle on company business, is granted only to licensed drivers who drive safely, maintain an acceptable driving history, and follow the provisions of this program.
- b) If a Fleet Driver allows an unauthorized person to drive the Fleet Vehicle, the Fleet Driver may be subject to disciplinary action up to and including, termination of employment.
- c) Unauthorized use is considered to be any use of a Fleet Vehicle or rental vehicle on company business, which is in violation of this policy, or driving when privileges are restricted, suspended or revoked.

39.6 Rented Vehicles Used For Business

Company Drivers (employees who drive rented vehicles on company business) are subject to all the provisions and standards of this program.

39.7 Driver qualifications

- a) SSS Supervisors shall visually verify the existence of a valid driver's license, in the possession of the driver being authorized to operate an SSS provided vehicle.

All prospective drivers shall sign the Use of Company Vehicle Policy prior to being assigned a vehicle to drive.

- b) All drivers who operate SSS company vehicles shall have a valid driver's license, specifically granting permission for that driver to operate that type and weight of vehicle.
- c) All drivers who operate SSS company vehicles shall obtain approval from their Supervisor, prior to operating the vehicle.



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- d) **Non-compliance with the above stated driver qualifications while operating an SSS company vehicle, shall be treated as vehicle theft, and immediately reported to SSS Management.**

39.8 Vehicle operation

- a) At the beginning of each shift, the operator shall inspect and check the assigned equipment, reporting immediately to his/her supervisor any malfunction of the clutch or of the braking system, steering, lighting, or control system, locking/tagging out the equipment if necessary.
- b) The operator must use access provided to get on or off equipment. Jumping from vehicles is not permitted.
- c) All occupants of SSS company vehicles shall always wear seat belts when the vehicle is in motion.
- d) Backup alarms are only required on forklifts. Road vehicles (trucks) are not required to have backup alarms. A spotter is required anytime a company vehicle is backing up unless the employee is a lone worker. They should then walk around vehicle and place a cone for guidance prior to backing up.
- e) All drivers who operate SSS company vehicles shall drive at a rate no greater than the maximum posted speed limit, or a slower speed, suitable for safe road conditions. A safe following distance shall be maintained. The use of radar speed detection devices is prohibited.
- f) All equipment may only be used for the purpose and manner for which it was designed by the manufacturer. It must be maintained in safe working order.
- g) No person shall ever drive an SSS company vehicle while under the influence of alcohol or illegal drugs. No alcohol or illegal drugs shall be present in an SSS company vehicle. Use of prescription medicines that adversely affect the drivers ability to drive is prohibited.
- h) All drivers who operate company vehicles shall be alert and well rested.
- i) Normal PPE including eye protection shall be worn, if equipment does not have an enclosed cab.
- j) No firearms shall ever be carried or present, in an SSS company vehicle.
- k) All vehicles have limitations regarding the number of passengers and total weight it can carry. Check the owner's manual to determine your vehicle's load limits. Do not overload your vehicle
- l) Loads shall be Safely positioned and secured for transport.



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- m) Passengers of vehicles are only permitted to ride in manufacturer's designed passenger seats. Riding anywhere else, on or in the vehicle, is strictly prohibited.
- n) Authorized drivers shall report any collision or traffic violation when operating a company vehicle, immediately to their supervisor.
- o) Violation of this policy shall result in disciplinary action, up to and including termination.

Cellular Phones

Driving a vehicle while distracted is always a potentially unsafe act, with serious consequences, up to and including fatalities of the driver, passengers, or occupants of other vehicles.

Is reaching for a burger, catching a drink about to spill, putting on makeup, placing or answering a call, e-mailing/texting while driving, or trying to read a map, worth the risk of the loss of your life, your spouse, your children, coworkers, or the lives of someone else's loved ones?

How would you feel if the most important person in your life was killed, because another driver was operating under any of the above distractions?

When operating a vehicle, it is the driver's RESPONSIBILITY to keep their:

- 1) **Hands on the WHEEL,**
- 2) **Eyes on the ROAD, and**
- 3) **Mind on DRIVING.**

To do otherwise, you risk causing something that would change your life forever. Therefore, the SSS position on distracted driving is as follows:

PROHIBITED- Texting, dialing or e-mailing while driving; as you cannot keep your eyes and your mind on the task of driving, if you are trying to do any of these distracting activities, or others that would likewise result in distracted driving.

Please always strive to handle cell phone use with these considerations:



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- a) Allow voice mail to handle your calls, and then return the calls when you are not driving.
- b) If you need to place or receive a call, park off the road in a safe location.
- c) If possible ask a passenger to make or take the call.
- d) Keep your hands on the wheel, your eyes on the road, and especially your mind on driving.

39.10 Hazard identification

- a) BACKING- Drivers of vans, or other vehicles with a limited rear view, are required to physically walk around their vehicles before backing up, to ensure there is proper clearance to the sides, behind and overhead. Drivers of heavy equipment (this includes forklifts) are required to have a spotter while backing up.
- b) If a spotter is not available, you MUST use an orange cone(s) TO MARK THE END OF THE SAFE BACKING ZONE.
- c) A clean windshield cuts potentially dangerous glare at night, and when driving into the sun. Clean lights enable you to see and be seen better. Drivers shall ensure that windshields, side windows, rear windows and lights are clean and in safe condition, before driving any company provided vehicle.
- d) Anything you put in your vehicle can become airborne in an accident. Avoid storing cargo in the passenger compartment. Avoid using the seats or the rear shelf for storing anything. All cargo must be secured against movement.
- e) Keep the sun visors and dashboard clear of all items. Anything you put on your dashboard, windshield, or sun visor, may injure or distract you.
- f) Your vehicle's design protects you; don't compromise your safety with add-on items.
- g) Proper air pressure is the key to braking, accident avoidance, and fuel economy. Check the air pressure in the tires regularly. Use the manufacturer's recommended tire inflation, which is listed in the owner's manual or the rating plate, normally affixed to the driver's door frame.
- h) Drivers shall not give rides to hitchhikers.

39.11 Fueling safety

- a) Drivers who operate SSS company vehicles shall not fill fuel tanks while the engine is running.



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- b) While fueling smoking and open flames are prohibited and the fuel nozzle must be in contact with the filling neck of the tank.
- c) Spillage shall be avoided.
- d) Drivers shall report any fuel spillage immediately.
- e) Drivers who operate SSS company vehicles shall ensure spillage of oil or fuel is carefully cleaned up, or completely evaporated, and the fuel tank cap replaced, before restarting the engine.
- f) Drivers who operate SSS company vehicles shall ensure that no company vehicle is operated with a leak in the fuel system.
- g) Driver shall continuously attend the nozzle while fueling the vehicle.

39.12 Driver Reporting Responsibilities

Drivers are required to notify their supervisor immediately if any of the following occurs:

- a) Any illness, injury, physical condition or use of medication, which may impair or affect the ability to safely drive a Fleet Vehicle or a rental vehicle, on company business.
- b) Any moving violation conviction.
- c) The suspension, revocation or administrative restriction of the driver's license.
- d) In the event of a suspension, revocation, and/or restriction of the employee's license, the employee must discontinue driving of the Fleet Vehicle and/or driving a company rented vehicle.

39.13 Vehicle Accidents/Accident Reporting

All drivers who operate SSS company provided vehicles, shall immediately report any accidents or incidents to an SSS Supervisor. An SSS HSE Supervisor shall ensure proper authorities have been notified and reports created, if applicable, and shall immediately notify SSS Management of any accidents or incidents involving SSS company vehicles.

39.14 Vehicle Inspections

All drivers who operate SSS Rig up and Water trucks shall perform inspections of their vehicles before leaving the SSS Service Facility, and as needed throughout the workday. In



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addition, these drivers shall perform a post trip inspection at the end of each work day.

Please refer to the following list-



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Each CDL driver is responsible to inspect:

- 1) Brakes
 - Adjustment (Very Important)
 - Brake Pods
 - Airlines
 - Drums
 - Brake shoe thickness (No less than 3/8")
 - Air tanks; (Drain oil & water daily)
- 2) Tires
 - Tread; (Depth 4/32" on steer tires, 2/32" on drive tires)
 - Cracks, bulges, etc.
- 3) Lugs; (loose, missing, or broken)
- 4) Wheels; (cracked, warped or bent)
- 5) Oil
 - Check Level
 - Change Regularly (track engine hours)
 - Inspect for leaks
- 6) Grease Regularly
- 7) Front Steering Axle
 - Tie Rod Ends
 - Drag Link Ends
 - King Pins
 - Fluid Levels
 - Springs/Hangers
- 8) Drivelines
 - U-joints
 - Carrier Bearings
- 9) Cross-members
- 10) Gauges
- 11) Low Air Warnings
- 12) Truck Cab
- 13) Housekeeping (keep clean)
- 14) Seat Belt



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- 15) Emergency Triangles
- 16) Fire Extinguisher
- 17) Check torque arms on rear-end
- 18) Tire chains & Tighteners
 - Sufficient amount
 - In working order
 - No dragging links
- 19) Power Steering Fluid
- 20) Chains & Load binders
 - Maintain in good condition (inspect before each use)
 - Not dragging on road
- 21) Lights
- 22) Permits
- 23) Trailers
 - Lights
 - Brakes
 - Tires
 - Suspension
 - Fifth Wheel
- 24) Fuel
 - Watch for leaks
- 25) Windshields & Mirrors
 - Wipers
 - Tanks
 - Vacuum Pump
 - All valves closed & capped/plugged while on the road.
 - Tank bolts
 - Hoses
 - Winch line
- 26) Inspect for wear (4 wickers in one strand = replace)
 - Tail boards
 - Blocks.
 - Poles
 - Truck & Trailer beds
 - Tail Rollers and supports



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- a) Any defects or deficiencies found during inspection shall be brought to the attention of either the supervisor or appropriate shop personnel.
- b) All environmentally sensitive safety concerns such as leaks, or DOT (FMCSR 393) out of service items, must be repaired immediately. All other repairs must be completed within a 5-day period. If repairs cannot be made immediately, documentation must be filed on the work order, describing the delays.
- c) When a defect has been reported by a driver, and the defect cannot be detected by the assigned mechanic, the assigned mechanic shall consult the shop supervisor before returning the vehicle to service. The results of this consultation shall be documented on the work order.

39.15 Safety Critical Check List

The Safety Critical Checklist provides a visual reference for SSS Mechanics to standardize the inspection process for all trucks being released from the shop.

Prior to any truck being released from the shop, the following items will be inspected, at a minimum, to verify that they are operational and within applicable specifications and/or standards;

- 1) Brakes - Adjustments must be made and service parts must be greased before leaving the shop. All brake chambers must be of the same type, and brake pods must be like for like per axle.
- 2) Brake Drums - Drums will be replaced when excessive wear or external cracking is evident. Drums will not be machined.
- 3) Hoses / Tubing - Excessive fraying, splitting, bulging, or swelling shall be cause for replacement.
- 4) Brake Lining - Brake linings shall be replaced when the thickness is 5/16" or less, at the center of the shoe.
- 5) Wheel Seals - Seals shall be replaced when any leakage of fresh oil or grease is evident
- 6) Slack Adjusters - Dissimilar slack adjusters shall be replaced with matching adjusters.
- 7) Low Air Warning - Missing or inoperable audible or visual low air warning devices shall be replaced. Low air warning devices shall activate when pressure drops below 55psi, or half of cut-out pressure, whichever is less.



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- 8) Tractor Protection Valve - Inoperable or missing tractor valve or trailer valve shall be replaced or repaired.
- 9) Pitman Arm – Defective items shall be replaced, if there is any looseness of the pitman arm on the steering gear output shaft, or there are any welded repairs.
- 10) Ball & Socket Joints - Defective items shall be replaced if there is: any movement under steering load of the stud nut, any motion greater than 1/8” (other than rotational) between any linkage member and its attachment point, or there are any welded repairs.
- 11) Tie Rods & Drag Links - Defective items shall be replaced if there are loose clamps or bolts on tie rods or drag links, or there is any looseness in any threaded joint.
- 12) Power Steering Fluid level must be at the required level on the dipstick.
- 13) Any loose, or missing, nuts or bolts shall be replaced.
- 14) Leaking exhaust parts shall be replaced when any exhaust leaks at a point forward of, or directly below, the driver’s compartment, and/or when the floor pan is in such condition as to permit the entry of exhaust fumes into the cab.
- 15) It is the responsibility of the individual mechanic to keep their work station cleaned up at the end of their workday
- 16) Compressor - Loose compressor bolts, cracked, broken or loose pulley, cracked or broken mounting brackets or braces, require replacement of defective parts.
- 17) Service Brakes - If brakes do not hold when applied, or there is a broken or missing valve, defective and/or missing parts shall be replaced.
- 18) Parking Brakes – When there is a missing or damaged valve or an audible air leak, the defective and/or missing parts shall be replaced.



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- 19) Steering - Free Play (lash) - For power systems, engine must be running:
- 16" wheel – 6-3/4" or more,
 - 18" wheel – 7-1/8" or more,
 - 19" wheel – 7-1/2" or more,
 - 20" wheel – 7-7/8" or more.
 - Any lashes falling in the above list must be corrected.
- 20) Steering Column – Defective items shall be replaced, if there is any absence or looseness of u-bolts, or positioning parts have been repaired, or the steering wheel is not properly secured.
- 21) Front Axle Beam - Any cracked or obviously welded parts shall be replaced.
- 22) Gear Box – Defective or missing items shall be replaced, if there are any loose or missing mounting bolts, there are any cracks in the gear box or mounting, there are any obvious welding repairs, there is any looseness of the yoke-coupling to the steering gear output shaft, or there is excessive leakage.



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40. Tire Chain Policy

40.1 Introduction

Slippery road conditions are a common occurrence in the Triple S workplace. The Employer relies heavily on the judgment of the driver of a heavy vehicle to determine the need for tire chains to maintain traction and control. Failure to make the correct decision could lead to serious injury, equipment damage or negative environmental impact. Often, a good decision based on the current conditions and timely actions on the part of the driver will more than make up, for the time and effort taken to properly mount tire chains.

40.2 Scope

The Tire Chain Policy applies to all Triple S Trucking vehicle operators.

40.3 Purpose

The purpose of the Tire Chain Policy is to protect SSS Employees and the public at large against injuries, as well as to minimize the risk of property and environmental damage, that could be caused by loss of control of a vehicle, or by the vehicle becoming stuck in mud or snow.

40.4 Required Forms

- SSS Job Hazard Analysis (JHA) Form

40.5 Policy

- a) When the conditions are such that tire chains are required to operate the vehicle in a safe fashion, tire chains shall, at a minimum, be mounted on all drive axle tires, **AND at least one steering axle tire.**
- b) Tire chains shall be mounted as tightly as possible.
- c) Chain tighteners shall be used on all mounted tire chains.
- d) Tire chains shall be inspected frequently for tightness and integrity.



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- e) Tire chains shall be kept in good repair. Broken chains shall be repaired by the driver or the swamper immediately when first noticed, to prevent suspension, body, fender or equipment damage.
- f) Chain damage must never be left for another person to repair.
- g) Truck managers must inspect all tire chains prior to the driver discarding them. Chains must be repaired, until repairing is no longer possible or economical, due to wear or cost.
- h) When returned to the hangers, care shall be taken to ensure that the chains will not drag the ground or road during transport.
- i) Drivers shall ensure that chain repair tools are present on the vehicle, and in good condition.
- j) Triple S Trucking Employees shall use proper lifting techniques when handling tire chains.
- k) Trucks must be pulled to a safe location for the installer to perform chaining or unchaining.
- l) Before mounting chains, SSS Employees shall turn off the vehicle engine, remove the ignition key and keep it in their possession, put the transmission into low gear, set the parking brake, and place wheel chocks in front of and to the rear, of at least one tire.
- m) It is recommended that rigger gloves be worn, subject to conditions and manual dexterity requirements
- n) Always ensure you know and follow the appropriate state regulations regarding proper chain use, in the state you are operating when using tire chains.



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41. Waste Management Policy

41.1 Introduction

Waste generated by SSS is regulated by various states' governmental regulatory agencies and the federal government, and must be properly managed. By striving to adhere to applicable waste management rules, regulations and laws, SSS can better protect the environment in which we live, work, and play.

41.2 Scope

41.3 It is the responsibility of SSS personnel to ensure the proper handling and disposal of all wastes generated.

41.4 Purpose

Proper waste management is necessary to protect human health and the environment and to be in compliance with current rules, regulations and laws, and to reduce SSS' and SSS Employees' liability associated with infractions. It is the policy of SSS to conduct all operations in a manner, which protects human health, and also protects the environment, private property, company property and our customer's property. It is the policy of SSS to comply with all applicable local, state and federal environmental protection rules, regulations and laws.

41.5 Required Forms

Infractions of waste management rules, regulations and laws require reporting to appropriate authorities, in accordance with applicable customer, local, state and federal laws, rules and regulations. This reporting shall be performed on the forms, and in a manner, required by those laws, rules and regulations.



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41.6 Policy

Various rules, regulations and laws prescribe the requirements for waste classification, storage, handling, transportation, and disposal. Although all waste must be properly managed, different waste classifications have different regulatory requirements.

- a) SSS Employees must make every effort to become informed, knowledgeable, and have an understanding of specific waste classifications, and the proper handling and management of their associated wastes.
- b) Liquid waste shall be disposed of in accordance with the SSS Discharge Permit.
- c) SSS Employees shall be trained regarding the environmental impacts of their individual jobs, and the impacts of their entire team, and how to minimize our environmental footprint.
- d) SSS Employees shall incorporate appropriate safe guards to prevent or minimize negative environmental impact.
- e) SSS Employees shall seek methods and procedures for improved environmental stewardship, through continually reviewing environmental performance.

Any SSS Employee who knowingly violates any environmental waste management rules, regulations or laws, is subject to civil and criminal prosecution.



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42. Hydrogen Sulfide- H₂S Policy

42.1 *Introduction*

Hydrogen Sulfide (H₂S) is a colorless, heavier than air gas, which has a smell similar to rotten eggs. It is produced when rotting organic matter decays in a low oxygen environment. It is extremely toxic, ranking second to Hydrogen Cyanide (HCN), and is five to six times more toxic than Carbon Monoxide (CO).

42.2 *Scope*

As SSS employees have the potential of H₂S exposure, when working in the field during drilling or well servicing.

42.3 *Purpose*

There is the chance of exposure when working in the Oil & Gas industry. As such, SSS believes it important to give employees knowledge and understanding of the effects of H₂S exposure, and the proper response in the event of an exposure.

42.4 *Required Forms*

- None

42.5 *Training*

Several key areas must be covered during training on H₂S in the workplace.

- a) **Possible locations where H₂S may be present-**
 - 1) During drilling or well servicing operations
 - 2) When recycling drilling mud or air
 - 3) Water from sour crude wells
 - 4) Water pits or tanks associated with drilling operations
 - 5) Performing maintenance on tanks or vessels containing water from the drilling process



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- b) **Physical properties of H₂S-**
- 1) Toxic, colorless gas with smell similar to rotten eggs
 - 2) Heavier than air- approximately 1.2 times heavier
 - 3) Highly toxic through inhalation
 - 4) Forms an explosive mixture with air
 - 5) Burns with a blue flame, producing Sulfur Dioxide (SO₂)
 - 6) Dissolves in water and liquid hydrocarbons
 - 7) Attacks most metals, especially in the presence of water
 - 8) Corrosive to plastics, rubber, living tissue and nerves
- c) **Health effects of H₂S exposure-**
- 1) Irritant to eyes, nose, throat and respiratory tract
 - 2) Reduces ability of blood to carry oxygen
 - 3) Dull or disables the 5-senses
 - 4) After initial exposure, sense of smell is paralyzed- you will no longer smell it- causing you to believe the hazard has passed
 - 5) Symptoms include- headache, dizziness, excitement, nausea, coughing, drowsiness, dryness and pain in the nose, throat or chest
 - 6) Best treatment is immediate removal from exposure area to fresh air
- d) **Important facts to remember-**
- 1) ***Threshold Limit Value (TLV)*** – **10 PPM**: the airborne concentration of a material to which nearly all persons can be exposed day after day, without adverse affects.
 - 2) ***Short Term Exposure Limit (STEL)*** – **15 PPM**: STEL exposures are limited to 15 minutes, followed by one (1) hour in fresh air. This cycle can be repeated four (4) times during a normal eight (8) hour work day.
NOTE that SSS employees are required to evacuate at 10 PPM!



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- 3) **Permissible Exposure Limit (PEL) – 10 PPM:** The legally enforceable level as established by OSHA and is normally expressed in parts per million (PPM). The PEL is the concentration that a worker may be exposed to for eight (8) hours a day, five (5) days a week for 30 years with no ill effects.
 - 4) SSS addresses detection of H₂S through the use of fixed or portable monitors, set to alarm at 10 PPM. **Employees are required to evacuate at 10 PPM or higher!**
 - 5) Your escape route should be upwind, or into a crosswind, and uphill if possible.
- e) H₂S monitors shall be worn in the wearer's breathing zone (not at the waist) and must be attached to the outermost clothing (not in a pocket).
- f) Should the H₂S alarms sound, employees must immediately evacuate the area, and notify their supervisor and the Company Man (if present on location). Should the Company Man not be present, the SSS supervisor shall notify them immediately of the presence of H₂S on their location.
- g) **What to do in and emergency, if someone goes down or is found down, in an area that may contain H₂S-**
- 1) Evacuate and sound the alarm
 - 2) Call 911 immediately
 - 3) Give good directions to the location- latitude and longitude
 - 4) Count people to ensure all are accounted for
 - 5) **Attempt a rescue only if you-**
 - a. Can safely evacuate the victim, without becoming the next victim;
 - b. Are qualified and fit to use a respirator, a self-contained breathing apparatus or airline respirator;
 - c. Can use the 'buddy system' to protect your own safety

Additionally, someone must stay near a phone, and you must notify your supervisor as soon as possible. The location Company Man must also be notified of the alarm and person down.



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43. Cheater Bar Policy

43.1 Scope

This policy applies to all SSS employees, whether working in the field, yard or shop. Generally, SSS employees will have no need to make use of a cheater bar. Should this change however, this policy must be followed. Water drivers must have prior Supervisor approval before using a cheater bar.

43.2 Specifications

In the event the use of a cheater bar/pipe is necessary, only one manufactured to the following specifications may be used:

- a) Cheater bars shall be made from steel only- type 1026 carbon steel, DOM, .083" wall.
- b) The length of the cheater bar shall be no more than twice the length of the pipe wrench handle. Edges shall be rounded for safe handling.
- c) A wrench retainer shall be installed, to secure the wrench inside the pipe, preventing the bar from slipping from the wrench during use.
- d) Each length of pipe wrench shall require a different sized cheater - length and inside diameter. The cheater inside diameter shall just fit over the wrench handle, without excessive play.
- e) Changes to these design specifications shall require a Management of Change (MOC).
- f) Cheater bars can only be used with steel wrenches- *NOT aluminum*.
- g) Cheater bars will have the outer end dipped in a slip resistant material for ~ 6 inches (such as *Plasti Dip*).

43.3 Usage

- a) Use of cheater bars, which do not meet the above design specifications, is strictly prohibited.
- b) Cheater bars shall not be used on a 24" wrench.
- c) Cheater bars are only to be used on a 36" steel wrench.
- d) Any cheater bars issued to AWS/SSS personnel-
 - 1) Shall be added to the *Equipment/Inspection Checklist*,
 - 2) Shall be inspected prior to use, and also monthly, during vehicle inspections.



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- e) If the use of the 36” wrench, and a cheater bar as manufactured to the above specifications does not work, employees must use the next biggest size pipe wrench- without a cheater bar.
- f) If the use of the bigger wrench is not effective, employees must ***Stop the Job***, and immediately contact their Supervisor.
- g) Do not use a cheater bar if footing is not secure.
- h) Clear the work area prior to use, ensuring it is free of clutter.
- i) Constant force should be applied when using a pipe wrench, with or without a cheater.

- j) Position body so that you are pushing down on the bar, not pulling down towards yourself. That way, should the wrench slip the force will be directed away from your body.**

- k) Any deviation from the above will require documented approval from your Manager or Superintendent.