	Hazardous Waste Operations & Emergency Response				
Control number:	HSE-P-28	Revision date:	8/29/2024	Rev #:	0
Approved by:	Derrick Landry	Revised by:	Madison Myers	MOC#:	N/A

## PURPOSE


The purpose of this program is to ensure the proper handling of hazardous waste on location in order to reduce and/or eliminate health risks to employees or damage to the environment.

### 1.0 ORGANIZATIONAL STRUCTURE

- A. The Onsite Customer Representative shall have the responsibility and authority to direct all hazardous waste operations. Employees shall follow a chain of command including immediate directives from Peak NDT Solutions Onsite Supervisor up to the Onsite Customer Representative.
- B. Peak NDT Solutions's Onsite Supervisor along with the Onsite Customer Representative shall have the responsibility to develop and implement an Emergency Response Plan to identify and control site specific health hazards as well as provide for emergency response.
- C. The Onsite Customer Representative and/or the most senior official onsite shall be responsible for controlling operations at the site.

### 2.0 EMERGENCY RESPONSE PLAN

- A. An Emergency Response Plan shall be developed & implemented to handle anticipated emergencies prior to the commencement of any operation. The plan shall be in writing & available for inspection by employees, their representatives & OSHA. The plan shall identify the hazards for each phase of the operation and is kept on the work site. The plan shall also address requirements and procedures for employee protection.
- B. The Emergency Response Plan shall address the following at a minimum:
  - Pre-emergency planning & coordination with outside parties;
  - Personnel roles, lines of authority, training & communications;
  - Personal protective equipment and emergency equipment;
  - Emergency recognition & prevention;
  - Emergency alerting and response procedures;
  - Safe distances & places of refuge;
  - Evacuation routes and procedures;
  - Decontamination; and
  - Emergency medical treatment


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### 3.0 EMERGENCY RESPONSE

- A. Prior to the commencement of emergency response operations, an Emergency Response Plan will be developed as part of the Site Safety Plan.
- B. First Responder awareness level employees who are likely to witness or discover a hazardous substance release shall be trained to initiate an emergency response sequence by notifying the proper authorities of the release.
- C. Emergency response employees who exhibit signs or symptoms, which may have resulted from exposure to hazardous substances during the course of an emergency, shall be provided with medical consultation.

### 4.0 DECONTAMINATION

- A. A decontamination procedure shall be developed, communicated to employees and implemented before any employees or equipment may enter areas on site where the potential for exposure to hazardous substances exists.
- B. All employees leaving a contaminated area shall be appropriately decontaminated. All contaminated clothing and equipment leaving a contaminated area shall be appropriately disposed of or decontaminated.
- C. Decontamination procedures shall be monitored by the site safety and health supervisor to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies.
- D. Decontamination shall be performed in geographical areas that will minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment.
- E. PPE and equipment shall be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness. Employees whose non-impermeable clothing becomes wetted with hazardous substances shall immediately remove the clothing.
- F. Unauthorized employees shall not enter controlled areas. Unauthorized employees shall not remove protective clothing or equipment from change rooms.

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G. Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, they shall be provided and meet the requirements of 29 CFR 1910.141.


H. Peak NDT Solutions's Decontamination plan, as part of our site-specific safety plan, allows us to effectively:

- Determine the layout and location of decontamination stations;
- Determine decontamination equipment that is needed;
- Determine appropriate decontamination methods;
- Establish procedures to prevent contamination of clean areas;
- Establish methods to minimize worker contact with contaminants during removal of PPE;
- Establish methods for disposal of clothing and equipment that cannot be decontaminated;
- Keep unauthorized individuals from entering decontamination areas;
- Inform commercial laundry facilities of potential contaminants and their health effects;
- Provide for showers and change rooms in accordance with 29 CFR 1910.141;
- Properly dispose of all solvents and equipment used for decontamination.

I. Our plan is revised whenever the type of PPE and equipment changes, the site conditions change, or the site hazards are reassessed based on new information.


## 5.0 ENGINEERING CONTROLS, AIR MONITORING & MEDICAL SURVEILLANCE

- A. Engineering controls, work practices and PPE shall be used to reduce and maintain exposure limits. Feasible engineering controls include the use of pressurized cabs or control booths on equipment, and/or the use of remotely operated material handling equipment.
- B. Air monitoring shall be used to identify and quantify airborne levels of hazardous substances. The monitoring should address initial entry, periodic monitoring, possible IDLH conditions and wherever exposure may be a possibility.
- C. Any employee who may be exposed to hazardous substances or health hazards at or above the established permissible exposure limit, above the published exposure level for a given substance, without regard for use of a respirator, for 30 days or more a year shall be provided medical surveillance. This shall be provided at no cost to the employee.

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## 6.0 EMPLOYEE TRAINING

- A. All Company employees including equipment operators, field personnel, supervisors and management shall be trained prior to being allowed to participate in or supervise any field activity.
- B. Training ensures that employees are aware of the potential hazards that they may encounter and provides the necessary knowledge and skills to perform their work with minimal risk to their safety and health. Management, supervisors and workers shall be trained to:
  - Recognition of hazards;
  - Use of personal protective equipment;
  - Use safe work practices to minimize hazardous risks;
  - Safe use of engineering controls and equipment;
  - Use proper decontamination procedures;
  - Understand the Emergency Response Plan, medical surveillance requirements, confined space entry procedures, spill containment program, and any appropriate work practices.
- D. Workers also must know the names of personnel and their alternatives responsible for site safety and health. The amount of instruction differs with the nature of the work operations. Employees must not perform any hazardous waste or emergency response operations unless they have been trained to the level required by their job function and responsibility, and have been certified by their instructor as having completed the necessary training.
- E. Peak NDT Solutions's training program shall consist of formal classroom instruction and hands on activities. In order to demonstrate competency, 3<sup>rd</sup> Party Training Instructors shall possess academic credentials and instructional experience. The training program is designed to exceed the minimal requirements specified under the HAZWOPER regulations detailed in 29 CFR 1910.120.
- F. Employees are trained prior to assignment to job duties. Training shall be based on specific employee duties and functions. Employees who are trained in accordance with Peak NDT Solutions's Emergency Response Plan shall receive annual refresher training.
- G. Upon completion of training, certificates and wallet cards documenting training are provided to all participants. A record of methods used for training and copies

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of certificates shall be kept in Employee's training file at Peak NDT Solutions corporate office, and are accessible to all employees, their representatives, the Secretary of Labor, or designee.

- H. Employees at all hazardous waste sites shall be trained to the level required by their job function and responsibility prior to performing any hazardous waste operation.

#### REVISION INFORMATION

This is applicable to changes made to the current version of the preceding document.

Revision Number	Description