

EMERGENCY ACTION PLAN & FIRE SAFETY– SHOP/OFFICE

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Penn Fencing, Inc.

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EMERGENCY ACTION PLAN & FIRE SAFETY

Penn Fencing, Inc.

1.1 INTRODUCTION

This Emergency Action Plan has been developed in accordance with Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.38. A copy of this standard is provided in Attachment A. This plan provides employees guidance for what to do in emergency situations (fire, tornado, spill, earthquake, etc.). Penn Fencing recognizes that the personal safety of each employee is and always will be of primary importance.

This written program will be maintained in the production office and may be reviewed by employees, as necessary.

1.2 RESPONSIBILITY

PROGRAM ADMINISTRATOR - CHAD GALBREATH

- Ensure this program is adhered to by all employees
- Review and approve any changes or revisions to this plan
- Enforce safety policies and procedures
- Conduct continual observational safety checks of work operations

MANAGEMENT

- Provide adequate resources for employee training and materials

EMPLOYEES

- Bring any unsafe/hazardous conditions or acts to management's attention in order to prevent injury to either themselves or any other employees

1.3 METHODS OF COMPLIANCE

EMERGENCY ESCAPE ROUTES

All employees are instructed to evacuate the building through the nearest possible exit. Emergency escape routes must be kept clear at all times. Escape routes are shown in Attachment B. Penn Fencing has designated safe areas for employees to report to in case of an emergency. Refer to site map for designated safe areas.

PROCEDURES FOR CRITICAL OPERATIONS

Critical operation shutdown procedures are not required for the office or shop. Therefore, no employees are authorized to delay evacuation for this purpose. It is the responsibility of Chad Galbreath to determine and communicate necessary changes to employees.

PROCEDURES TO ACCOUNT FOR EMPLOYEES

After an emergency evacuation of each site location, employees are to gather at the following meeting points.	
<u>Site Location</u>	<u>Meeting Point</u>
Sales office	Front sign
Log cabin	Front sign
Warehouse 1	Front sign
Warehouse 2	Electrical pole in the yard
Jobsite	To be determined prior to the start of the job

Chad Galbreath will be responsible for specific procedures to account for employees, visitors and subcontractors after the emergency evacuation. These procedures should be designed to account for all employees, determine if an employee needs assistance in evacuating, and to establish their possible location.

PROCEDURE FOR REPORTING EMERGENCIES

The quicker and more efficient emergencies are reported, the greater the chance for saving lives and property. The following is the procedure for reporting an emergency in this company. This procedure should be accessible to all employees.

REPORTING AN EMERGENCY

Should an employee discover a fire or other emergency, the employee must report it to the foreman immediately. The foreman must then contact the appropriate emergency services. If a fire occurs and it is not out of control, the employee should send someone to notify the foreman and attempt to extinguish the fire with the appropriate fire extinguishing equipment.

foremen must quickly assess the severity of the incident, determine the number of injured persons, and arrange for the appropriate emergency services. Should the foreman not be immediately available, the employee should contact the fire department. Use the following procedures when contacting the fire department, police department, EMT, or other emergency response party.

Direct Contact with Emergency Services – If appropriate, directly contact the fire department, police department, EMT, or other appropriate party. Be calm and accurate, and be sure instructions are understood before hanging up. Provide the following information:

- a. Your Name
- b. Company Name
- c. Location & GPS coordinates (if applicable)
- d. Type of incident (fire, medical emergency, spill, cave-in, or other)
- e. Call Back Number or Cell Phone Number

Post an employee at the facility entrance to control access and direct emergency response personnel (i.e., fire truck, ambulance, police, hazmat team, etc.). If applicable, assign someone to contact neighbors, neighboring companies, or community agencies (schools, churches, or community groups such as community advisory panels, etc.) other than emergency services that could be affected by the emergency.

An employee should never place themselves or other employees in danger to extinguish a fire or respond to an emergency. A properly trained person may administer first aid/CPR until the ambulance service, rescue squad, or other appropriate emergency service provider arrives.

Employees must report all accidents, injuries and/or illnesses to Chad Galbreath who is responsible for making sure that company accident/injury/illness reporting procedures are followed.

FIRE

Should an employee discover a fire, the employee must report it to the foreman. Portable fire extinguishers are provided in the workplace for use by employees. In the event of fire, any trained and authorized employee may use a fire extinguisher to attempt to put out the fire before evacuation. If a fire cannot be put out with the appropriate fire extinguisher, evacuate the building immediately.

In the event the building needs to be evacuated an announcement should be made. Evacuation maps point out exit routes and assembly areas. Employees are to evacuate the building via the closest, safest, available exit in an orderly fashion and should not run, push or cause confusion. If time permits, designated employees should turn off power to equipment and machinery.

After evacuation of the facilities, employees must gather at the designated assembly areas in order to be accounted for in a head count. Chad Galbreath has the responsibility to account for all employees. Refer to the Fire evacuation drawing.

TORNADO

In the event that a tornado is likely to hit in the area, an announcement must be made. Employees should shut off all power to machinery and equipment, gas lines, etc., as long as time permits. Employees should then seek shelter in the most stable part of the facility away from windows. If an employee cannot make it to the designated shelter area, seek shelter away from doors and windows and towards the center of the building, near inside walls, corridors or support columns. Employees who are outdoors should seek shelter in a low-lying ditch or near a solid structure. Employees should not use telephones unless it is

necessary for emergency purposes. Remain calm, walk, and do not push or cause confusion. All employees should gather at the assembly point to be accounted for. Chad Galbreath has the responsibility to account for all employees.

FUEL OR CHEMICAL RELEASE

Chemicals whether liquid, solid, or gas can spill or leak and be harmful to both personnel and the environment. If an employee should discover a spill or leak, they should leave the area immediately and notify the foremen. The Safety Data Sheet (SDS) for the spilled or leaking material should be consulted to identify potential hazards, protective equipment required, and correct procedures for clean-up. Shut off ignition sources, flames, spark producing or heat producing equipment, and provide adequate ventilation. If the spill or leak is too big to handle with available equipment, an emergency response team should be notified.

Liquid Spills – If a container is leaking, a reasonable effort should be made to stop the leak and/or contain the spill, without compromising personal risk. Maneuver containers so that the hole is above the liquid level or try to plug the hole. If possible, confine a spill so that its contents do not enter a drain, ditch or seep into the ground.

Gas Leaks – Alert all employees, check the wind direction, and begin assessing the extent of the release.

- Evacuate and assemble upwind of the leak.
- Direct non-essential personnel and visitors to evacuate the immediate area. Ensure that the selected assembly area is upwind of the gas leak. If not, evacuate all personnel to the alternate safe area outside of the facility using routes and exits that will avoid the hazard area.
- Perform a headcount.
- **WARNING! RESCUE OF ANY DOWNED PERSONNEL SHOULD BE PERFORMED ONLY BY A TRAINED, QUALIFIED PERSON WEARING SCBA WITH AN APPROPRIATE BACKUP/WATCHER.** Without this capacity, do not attempt a rescue; contact the EMS and/or fire department.
- Stop or contain the leak, if possible. NOTE: Careful assessment is essential before you proceed.

EARTHQUAKE

Earthquakes usually occur without any type of warning. Due to the suddenness of earthquakes, employees should seek shelter in a doorway passage, under a table or desk or other structurally sound area. Although earthquakes in themselves are dangerous, other emergencies may develop as a result of the earthquake. Gas lines, water lines and power lines may all be damaged in an earthquake and present significant hazards. Therefore, after an earthquake has stopped, the workplace should be inspected for damages and preventive measures taken. Chad Galbreath has the responsibility to account for all employees once an earthquake has stopped, checking for injuries and providing first aid where needed. The facilities shall also be inspected for damage, water lines, power lines and gas lines shall also be shut off. If the building has suffered major structural damage, employees must be evacuated. Management shall notify proper utility companies or other services as needed.

Emergency phone numbers should be posted near telephones, or employees' notice boards and other conspicuous locations where telephones will be used as a means of reporting emergencies.

ACTIVE SHOOTER EVENT

An active shooter is a person or persons who appears to be actively engaged in harming or attempting to kill people in the facility. They may use firearms, other weapons, or improvised explosive devices. Although authorities and management are working hard to protect you, situations can arise and employees may be in danger. In most active shooter cases, warning signs may vary, motivations are different, and there may be no pattern or method for selecting victims.

The effects may be minor to devastating; always prepare for the worst.

As a facility that welcomes new and returning individuals on a daily basis, your survival may depend on if you have an effective plan in place. Remember, it doesn't have to be complicated. If you can get out, do so. It is always best to leave and evacuate to a designated location if you can do so safely. Encourage others to follow you but do not stay behind for them. You are your most important priority, not your belongings or materials.

During active shooter event, you have three options; run, hide, or fight:

1. Run	2. Hide	3. Fight
<ul style="list-style-type: none"> a. If there is an escape path, attempt to evacuate to the designated area. b. Evacuate whether others agree to or not. c. Leave your belongings behind. d. Help others escape if possible. e. Prevent others from entering the area. f. Call 911 when you are safe 	<ul style="list-style-type: none"> a. Lock and/or blockade the door. b. Silence your cell phone. c. Hide behind large objects. d. Remain very quiet. 	<ul style="list-style-type: none"> a. Attempt to incapacitate the shooter. b. Act with physical aggression. c. Improvise weapons. d. Commit to your actions.

When law enforcement arrives:

- Remain calm and follow instructions.
- Keep your hands visible at all times.
- Avoid pointing or yelling.
- Know that help for the injured is on its way.
- Provide as much of the following information as possible:
 - Number of shooters
 - Number of individual victims and any hostages

- The source or type of program causing the situation
- Type and number of weapons in possession of the shooter
- Keys to all involved areas as well as floor plans

After law enforcement arrives and the situation is under control, uninjured employees may contact family members or leave the premises if given approval by management. Chad Galbreath shall inform emergency contacts and family members of all injured employees. Work closely with law enforcement and provide all known information to ensure the situation is fully resolved and the “All Clear” is given.

Following any type of active shooter situation or event where employees are in danger, there will be repercussions. All injured/non-injured employees, bystanders, and even family members may need further assistance with completely resolving the situation. Notify employees that healthcare or counseling services can be provided if necessary.

RESCUE AND MEDICAL DUTIES

Chad Galbreath is responsible for, if appropriate, the enlistment and training of the authorized Fire Brigade personnel or availability of site fire and rescue services. At this time, Penn Fencing relies on the local fire department and EMS.

EMERGENCY NOTIFICATION

If deemed necessary in the future, an alarm system that is capable of being perceived above ambient noise or light levels by all employees may be used in the workplace. Tactile devices may be used to alert those employees who would not otherwise be able to recognize the audible or visual alarm.

TRAINING AND RECORDKEEPING

Chad Galbreath is responsible for ensuring the training of all employees covered under this program. As part of the Emergency Action Program our employees will be trained under the following circumstances:

- At the time of initial assignment and annually thereafter,
- When an employee’s responsibilities change under this program.
- Any employees responsible for leading the evacuation will be trained in evacuation inspections of closed rooms, alternate escape routes, employees that may need additional assistance, buddy system, and hazardous areas to avoid during evacuation procedures.

Curriculum for training includes the following:

- Review of this plan, including how it can be accessed
- Review of applicable OSHA standards, including how they can be accessed
- Recognition of potential fire hazards
- Good housekeeping practices
- Proper response and notification in the event of an emergency
 - Hazardous substances and the risks associated with them in an emergency
 - The potential outcomes associated with an emergency created when hazardous substances are present

- Recognizing the presence of hazardous substances in an emergency
- Identifying the hazardous substances, if possible
- The role of the first responder awareness individual in the employer's emergency response plan, including site security and control
- Identifying the need for additional resources
- Making appropriate notifications to the communication center
- Proper instruction on the use of portable fire extinguishers (as determined by company policy)

Training logs are provided in attachment H of this program. For additional information on training or recordkeeping for this Emergency Action Program, employees should contact Chad Galbreath.

EMERGENCY PHONE NUMBERS

The following page provides a list of telephone numbers to be used in the event of an emergency.

EMERGENCY CONTACTS

<u>Title</u>	<u>Name</u>	<u>Number</u>
President	Chad Galbreath	(724)321-2631
General Manager	Tom Czwalga	(724)586-7906
Commercial Estimator	Matt Nebel	(724)612-9374
Police	Local Authorities	911
Fire	Local Authorities	911
Ambulance	Local Authorities	911
Poison Control	Local Authorities	1-800-222-1222
Spill Response	Local Authorities	1-800-424-8802

GPS Coordinates: _____

FIRE SAFETY PLAN

2.1 OBJECTIVE

The purpose of this Fire Prevention Plan is to provide guidance for eliminating the causes of fire, prevent loss of life and property by fire, and to comply with the Occupational Safety and Health Administration's (OSHA) requirements for fire prevention plans. This plan provides employees with information and guidelines that will assist them in recognizing, reporting, and controlling fire hazards.

A copy of the OSHA standard covering Fire Extinguishers, 29 CFR 1910.157, is provided in Attachment C.

2.2 RESPONSIBILITY

FIRE SAFETY PLAN ADMINISTRATOR - CHAD GALBREATH

- Ensure this program is adhered to by all employees.
- Maintain all records pertaining to the plan.
- Review and approve any changes or revisions to this plan.
- Enforce safety policies and procedures.
- Develop and administer the Penn Fencing fire prevention training program.
- Ensure that fire control equipment and systems are properly maintained.
- Control fuel source hazards.
- Conduct fire risk surveys (see Attachment D) and make recommendations.
- Ensure that any gas leaks are repaired immediately upon notification.

MANAGEMENT AND FOREMEN

- Ensure that employees receive appropriate fire safety training.
- Enforce this fire prevention and protection plan.

EMPLOYEES

- Notify the Plan Administrator when changes in operation increase the risk of fire.
- Complete all required training before working without supervision.
- Conduct operations safely to limit the risk of fire.
- Report potential fire hazards to the foremen.
- Follow fire emergency procedures.

2.3 PLAN IMPLEMENTATION

GOOD HOUSEKEEPING

To limit the risk of fires, employees shall take the following precautions.

1. Minimize the storage of combustible materials.
2. Make sure that doors, hallways, stairs, and other exit routes are kept free of obstructions.
3. Dispose of combustible waste in covered, airtight, metal containers.
4. Use and store flammable materials in well-ventilated areas away from ignition sources.
5. Use only nonflammable cleaning products.
6. Keep incompatible (i.e., chemically reactive) substances away from each other.
7. Perform "hot work" (i.e., welding or working with an open flame or other ignition sources) in controlled and well-ventilated areas.
8. Keep equipment in good working order (i.e., inspect electrical wiring and appliances regularly and keep motors and machine tools free of dust and grease.
9. Ensure that heating units are safeguarded.
10. Report all gas leaks immediately.
11. Repair and clean up flammable liquid leaks immediately.
12. Keep work areas free of dust, lint, sawdust, scraps, and similar material.
13. Do not rely on extension cords if wiring improvements are needed, and take care not to overload circuits with multiple pieces of equipment.
14. Ensure that required hot work permits are obtained.
15. Turn off electrical equipment when not in use.

Penn Fencing will ensure that equipment is maintained according to manufacturers' specifications and in accordance with any applicable National Fire Protection Association (NFPA) requirements. The following equipment is subject to the maintenance, inspection, and testing procedures performed by properly trained personnel:

- Equipment installed to detect fuel leaks, control heating, and control pressurized systems;
- Portable fire extinguishers, automatic sprinkler systems, and fixed extinguishing systems;
- Detection systems for smoke, heat, or flame;
- Fire alarm systems; and
- Emergency backup systems and the equipment they support.

2.4 TYPES OF HAZARDS

The following sections address the major workplace fire hazards that may be present at Penn Fencing along with the procedures for controlling these hazards.

ELECTRICAL FIRE HAZARDS

Electrical system failures and the misuse of electrical equipment are leading causes of workplace fires. Fires can result from loosened ground connections, wiring with frayed insulation, or overloaded fuses, circuits, motors, or outlets. To prevent electrical fires, employees shall:

- 1 Make sure that worn wires are replaced.
- 2 Use only appropriately rated fuses.
- 3 Never use extension cords as substitutes for wiring improvements.
- 4 Use only approved extension cords [i.e., those with the Underwriters Laboratory (UL) or Factory Mutual (FM) label].
- 5 Check wiring in hazardous locations where the risk of fire is especially high.
- 6 Check electrical equipment to ensure that it is either properly grounded or double insulated.
- 7 Ensure adequate spacing while performing maintenance.

PORTABLE HEATERS

Chad Galbreath shall approve all portable heaters. Portable electric heaters shall have tip-over protection that automatically shuts off the unit when it is tipped over. There shall be adequate clearance between the heater and combustible furnishings or other materials at all times.

OFFICE FIRE HAZARDS

Fires in offices have become more likely because of the increased use of electrical equipment, such as computers and fax machines. To prevent office fires, employees shall:

- 1 Avoid overloading circuits with office equipment.
- 2 Turn off nonessential electrical equipment at the end of each workday.
- 3 Keep storage areas clear of rubbish.
- 4 Ensure that extension cords are not placed under carpets.
- 5 Ensure that trash and paper set aside for recycling is not allowed to accumulate.

CUTTING, WELDING, AND OPEN FLAME WORK

Chad Galbreath is responsible for ensuring the following:

- All necessary hot work permits have been obtained prior to work beginning.
- Cutting and welding are done by authorized personnel in designated cutting and welding areas whenever possible.
- Adequate ventilation is provided.
- Torches, regulators, pressure-reducing valves, and manifolds are UL listed or FM approved.
- Oxygen-fuel gas systems are equipped with listed and/or approved backflow valves and pressure-relief devices.
- Cutters, welders, and helpers are wearing eye protection and protective clothing as appropriate.
- Cutting or welding is prohibited in areas while sprinkler protection is out of service.

- Cutting or welding is prohibited in areas where explosive atmospheres of gases, vapors, or dusts could develop from residues or accumulations in confined spaces.
- Cutting or welding is prohibited on metal walls, ceilings, or roofs built of combustible sandwich-type panel construction or having combustible covering.
- Confined spaces such as tanks are tested to ensure that the atmosphere is not over ten percent of the lower flammable limit before cutting or welding in or on the tank.
- Small tanks, piping, or containers that cannot be entered are cleaned, purged, and tested before cutting or welding on them begins.
- Fire watch has been established, as needed.
- All personnel left in charge of oxygen or fuel-gas supply equipment and employees assigned to operate arc welding equipment have been properly trained on the hazards associated with and the precautions necessary for this type of work and are qualified to operate such equipment.
- All employees who are assigned to operate or maintain equipment are familiar with OSHA's welding, cutting, and brazing requirements.
- First aid equipment must be available at all times.

OSHA's requirements covering welding are summarized below. For complete details and exact language refer to 1910 Subpart Q: Welding, Cutting, and Brazing.

BASIC PRECAUTIONS

Basic precautions to be taken for fire prevention in welding or cutting work are as follows.

- Fire hazards - If the object to be welded or cut cannot readily be moved, all movable fire hazards in the vicinity must be taken to a safe place.
- Guards - If the object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards have to be used to confine the heat, sparks, and slag, and to protect the immovable fire hazards.
- Restrictions - If the requirements stated above cannot be followed then welding and cutting may not be performed.

SPECIAL PRECAUTIONS

When the nature of the work to be performed requires the use of guards due to conditions described above, the following additional precautions may be necessary.

- Combustible Material - Wherever there are floor openings or cracks in the flooring that cannot be closed, precautions should be taken so that no readily combustible materials on the floor below will be exposed to sparks that might drop through the floor. The same precautions are to be observed with regard to cracks or holes in walls, open doorways and open or broken windows.
- Fire Extinguishers - Suitable fire extinguishing equipment must be maintained in a state of readiness for instant use. Such equipment may consist of pails of water, buckets of sand, hose or portable extinguishers depending upon the nature and quantity of the combustible material exposed.

- Fire Watch - Fire watchers are required whenever welding or cutting is performed in locations where other than a minor fire might develop, or any of the following conditions exist:
 - Appreciable combustible material, in building construction or contents, is closer than 35 feet (10.7 m) to the point of operation.
 - Appreciable combustibles are more than 35 feet (10.7 m) away, but are easily ignited by sparks.
 - Wall or floor openings within a 35-foot (10.7 m) radius expose combustible material in adjacent areas including concealed spaces in walls or floors.
 - Combustible materials are adjacent to the opposite side of metal partitions, walls, ceilings, or roofs and are likely to be ignited by conduction or radiation.
 - Fire watchers must have fire extinguishing equipment readily available and be trained in its use. They are to be familiar with facilities for sounding an alarm in the event of a fire. They are required to watch for fires in all exposed areas, try to extinguish them only when obviously within the capacity of the equipment available, or otherwise sound the alarm. A fire watch must be maintained for at least a half hour after completion of welding or cutting operations to detect and extinguish possible smoldering fires.
- Authorization - Before cutting or welding is permitted, the area must be inspected by the individual responsible for authorizing cutting and welding operations. That person should designate any precautions to be followed in granting authorization to proceed, preferably in the form of a written permit.
- Floors - Where combustible materials such as paper clippings, wood shavings, or textile fibers are on the floor, the floor is required to be swept clean for a radius of 35 feet (10.7 m). Combustible floors should be kept wet, covered with damp sand, or protected by fire-resistant shields. Where floors have been wet down, personnel operating arc welding or cutting equipment must be protected from possible shock.
- Compressed Gas Cylinders – Oxygen cylinders must be stored in an upright secured position at least 20 feet from flammable gases or petroleum products.
- Prohibited Areas - Cutting or welding are not be permitted in the following situations:
 - In areas not authorized by management.
 - In sprinklered buildings while such protection is impaired.
 - In the presence of explosive atmospheres (mixtures of flammable gases, vapors, liquids, or dusts with air), or explosive atmospheres that may develop inside un-cleaned or improperly prepared tanks or equipment which have previously contained such materials, or that may develop in areas with an accumulation of combustible dusts.
 - In areas near the storage of large quantities of exposed, readily ignitable materials such as bulk sulfur, baled paper, or cotton.
- Relocation of Combustibles - Where practicable, all combustibles must be relocated at least 35 feet (10.7 m) from the work site. Where relocation is impracticable, combustibles are required to be protected with flame-proofed covers or otherwise shielded with metal or asbestos guards or curtains.
- Ducts - Ducts and conveyor systems that might carry sparks to distant combustibles must be suitably protected or shut down.

- Combustible Walls - Where cutting or welding is done near walls, partitions, ceiling or roof of combustible construction, fire-resistant shields or guards shall be provided to prevent ignition.
- Noncombustible Walls - If welding is to be done on a metal wall, partition, ceiling, or roof, precautions must be taken to prevent ignition of combustibles on the other side, due to conduction or radiation, preferably by relocating combustibles. Where combustibles are not relocated, a fire watch on the opposite side from the work has to be provided.
- Combustible Cover - welding may not be attempted on a metal partition, wall, ceiling, or roof having a combustible covering; or on walls or partitions of combustible sandwich-type panel construction.
- Pipes - Cutting or welding on pipes or other metal that is in contact with combustible walls, partitions, ceilings, or roofs may not be undertaken if the work is close enough to cause ignition by conduction.
- foreman Responsibilities – foremen in charge of cutting and welding operations have the following responsibilities.
 - The safe handling of the cutting or welding equipment and the safe use of the cutting or welding process
 - Determining the combustible materials and hazardous areas present or likely to be present in the work location
 - Protection of combustibles from ignition by the following:
 - Moving the work to a location free from dangerous combustibles
 - Moving the combustibles to a safe distance from the work or properly shielding the combustibles against ignition, if the work cannot be moved
 - Making sure that cutting and welding are scheduled so that plant operations that might expose combustibles to ignition are not started during cutting or welding
 - Securing authorization for the cutting or welding operations from the designated management representative
 - Determining that the cutter or welder secures his approval that conditions are safe before going ahead. Operators of equipment must report any equipment defect or safety hazards and discontinue use of equipment until its safety has been assured; repairs may be made only by qualified personnel.
 - Verifying that fire protection and extinguishing equipment are properly located at the site
 - Ensuring that fire watches are available at the site, where required
- Fire Prevention Precautions - Cutting or welding may be permitted only in areas that are or have been made fire safe. When work cannot be moved practically, as in most construction work, the area must be made safe by removing combustibles or protecting combustibles from ignition sources.
- Any welding, cutting, or burning of lead based metals, zinc, cadmium, mercury, beryllium, or exotic metals or paints shall have proper ventilation or respiratory protection.

WELDING OR CUTTING CONTAINERS

- Used Containers - No welding, cutting, or other hot work may be performed on used drums, barrels, tanks or other containers until they have been cleaned so thoroughly as to make absolutely certain that there are no flammable materials present or any substances such as

greases, tars, acids, or other materials which, when subjected to heat, might produce flammable or toxic vapors. Any pipe lines or connections to the drum or vessel are to be disconnected or blanked.

- Venting and Purging - All hollow spaces, cavities, or containers must be vented to permit the escape of air or gases before preheating, cutting or welding. Purging with inert gas is recommended.

CONFINED SPACES

- Accidental Contact - When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes must be removed from the holders and the holders carefully located so that accidental contact cannot occur and the machine be disconnected from the power source.
- Torch Valve - In order to eliminate the possibility of gas escaping through leaks or improperly closed valves when gas welding or cutting, the torch valves are required to be closed and the gas supply to the torch positively shut off at some point outside the confined area, whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight. Where practicable, the torch and hose should also be removed from the confined space.

NFPA STANDARD 51B, 1962

- For elaboration of these basic precautions, as well as a delineation of the fire protection and prevention responsibilities of welders and cutters, the foremen (including outside contractors) and those in management on whose property cutting and welding is to be performed, see, Standard for Fire Prevention in Use of Cutting and Welding Processes, NFPA Standard 51B,1962.

2.5 FLAMMABLE AND COMBUSTIBLE MATERIALS

The combustible materials present at Penn Fencing will be assessed regularly by Chad Galbreath. A list of fire hazards can be found in Attachment D.

Certain types of substances can ignite at relatively low temperatures or pose a risk of catastrophic explosion if ignited. Such substances obviously require special care and handling.

CLASS A COMBUSTIBLES

Class A combustibles include common combustible materials (wood, paper, cloth, rubber, and plastics) that can act as fuel and are found in non-specialized areas such as offices. To handle Class A combustibles safely:

- Dispose of waste daily.
- Keep trash in metal-lined receptacles with tight-fitting covers (metal wastebaskets that are emptied every day do not need to be covered).
- Keep work areas clean and free of fuel paths that could allow a fire to spread.

- Keep combustibles away from accidental ignition sources, such as hot plates, soldering irons, or other heat- or spark-producing devices.
- Store paper stock in metal cabinets.
- Store rags in metal bins with self-closing lids.
- Do not order excessive amounts of combustibles.
- Make frequent inspections to anticipate fires before they start.

Water, multi-purpose dry chemical (ABC), and halon 1211 are approved fire extinguishing agents for Class A combustibles.

CLASS B COMBUSTIBLES

Class B Combustibles include flammable and combustible liquids (oils, greases, tars, oil-based paints, and lacquers), flammable gases, and flammable aerosols. To handle Class B combustibles safely:

- Use only approved pumps, taking suction from the top, to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets).
- Do not dispense Class B flammable liquids into containers unless the nozzle and container are electrically interconnected by contact or by a bonding wire. Either the tank or container must be grounded.
- Store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources such as heating or electric equipment, open flames, or mechanical or electric sparks.
- Do not use a flammable liquid as a cleaning agent inside a building (the only exception is in a closed machine approved for cleaning with flammable liquids).
- Do not use, handle, or store Class B combustibles near exits, stairs, or any other areas normally used as exits.
- Do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles.
- Do not generate heat, allow an open flame, or smoke near Class B combustibles.
- Know the location of and how to use the nearest portable fire extinguisher rated for Class B fire.

Water should not be used to extinguish Class B fires caused by flammable liquids. Water can cause the burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude the air around the burning liquid. The following fire-extinguishing agents are approved for Class B combustibles: carbon dioxide, multi-purpose dry chemical (ABC), halon 1301, and halon 1211. (NOTE: Halon has been determined to be an ozone-depleting substance and is no longer being manufactured. Existing systems using halon can be kept in place.)

SMOKING

It is the policy of Penn Fencing to monitor and comply with the PA Clean Indoor Air Act and all amendments. As such, Penn Fencing will prohibit smoking in all enclosed workplaces.

Smoking is prohibited at or in the vicinity of operations which constitute a fire hazard (i.e., near flammables, combustibles, or when handling chemicals). These areas shall be conspicuously posted with signs stating the following: "No Smoking or Open Flame."

Any outdoor or jobsite areas where Penn Fencing prohibits smoking must be identified by NO SMOKING signs.

2.6 TRAINING

Chad Galbreath shall ensure that basic fire prevention training is provided to all employees upon employment, and shall maintain documentation of the training, which includes:

- 1) Review of 29 CFR 1910.38, including how it can be accessed;
- 2) This Fire Prevention Plan, including how it can be accessed;
- 3) Good housekeeping practices;
- 4) Proper response and notification in the event of a fire;
- 5) Instruction on the use of portable fire extinguishers (as determined by company policy in the Emergency Action Plan); and
- 6) Recognition of potential fire hazards.

foremen shall train employees about the fire hazards associated with the specific materials and processes to which they are exposed, and will maintain documentation of the training. Employees will receive this training:

- 1) At their initial assignment;
- 2) Annually; and
- 3) When changes in work processes necessitate additional training.

2.7 PROGRAM REVIEW

Chad Galbreath shall review this Fire Prevention Plan at least annually for necessary changes.

ATTACHMENT A: OSHA EMERGENCY ACTION PLAN
STANDARD

- 29 CFR 1910 Subpart E

ATTACHMENT B: EMERGENCY ESCAPE ROUTE(S)

ATTACHMENT B: EMERGENCY EXITS

<u>Location</u>	<u>Exit(s)</u>
Sales office	3
Log cabin	2
Warehouse 1	3
Warehouse 2	2
Jobsite	Varies

Emergency Procedures

Insert copies of Location Specific Emergency Procedures and GPS coordinates on the following pages

ATTACHMENT C: OSHA FIRE EXTINGUISHER
STANDARD

- 29 CFR 1910.157

ATTACHMENT D: FIRE RISK SURVEY

HOT WORK PERMIT

ATTACHMENT D: FIRE RISK SURVEY

<u>Fire Hazard</u>	<u>Location</u>
Welding	Warehouse 1 & 2

<u>Ignition Source</u>	<u>Control</u>
Welding	Designated areas
Smoking	Smoking policy
Torch cutting	Designated areas

Completed by: Chad Galbreath **Date:** 03/01/2019

ATTACHMENT D: HOT WORK PERMIT

Permit Number:	Date:	Time:
Issued by:	Position:	

Note: Hot Work Permits are only valid for 24 hours)

DETAILS OF WORK

Period of Work:	
Exact Location:	
Equipment for the operation:	
Fire Hazard:	
Other Hazards:	
Comments:	
Name(s) of Fire Watch:	
Name(s) of persons performing hot work:	

HOT WORK SUPERVISOR CHECKLIST

SUBJECT	SATISFACTORY	UNSATISFACTORY
Sprinklers and hose streams in service/operable		
Hot Work Equipment in good condition		
Multi-purpose fire extinguisher and/or water source		

REQUIREMENTS WITHIN 35 FEET OF WORK

Dust, Lint, Debris, Flammable Liquids and oily deposits removed.		
Explosive atmosphere in area eliminated.		
Combustible floors are wet down, covered with damp sand or fire blankets.		
Remove flammable and combustible material where possible.		
All wall and floor openings covered.		
Walkways protected beneath hot work		

WORK ON WALLS OR CEILINGS

Combustibles moved away from other side of wall.		
--	--	--

WORK IN CONFINED SPACES

Confined space cleaned of all combustibles (grease, oil, dusts, flammables)		
Containers purged of flammable liquids/vapors.		
Follow confined space guidelines.		

FIRE WATCH/HOT WORK AREA MONITORING

Fire watch will be provided during and for 30 minutes after work.		
Fire watch is supplied with an extinguisher, and/or water pump.		
Fire watch is trained in use of this equipment and familiar with emergency action plans.		
Fire watch may be required for opposite side of walls, above, and below floors and ceilings.		

OTHER PRECAUTIONS:

Foreman Signature:	Date:
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ATTACHMENT E: GENERAL FIRE PREVENTION
CHECKLIST & EXITS CHECKLIST

ATTACHMENT E: GENERAL FIRE PREVENTION

Use this checklist to ensure fire prevention measures conform to the general fire prevention requirements found in OSHA standards.

- Yes No Is the local fire department acquainted with your facility, its location, and specific hazards?
- Yes No If you have a fire alarm system, is it tested at least annually?
- Yes No If you have interior standpipes and valves, are they inspected regularly?
- Yes No If you have outside private fire hydrants, are they on a routine preventive maintenance schedule and flushed at least once a year?
- Yes No Are fire doors and shutters in good operating condition?
- Yes No Are fire doors and shutters unobstructed and protected against obstructions, including their counterweights?
- Yes No Are automatic sprinkler system water control valves, air pressure, and water pressure checked weekly or periodically?
- Yes No Has responsibility for the maintenance of automatic sprinkler systems been assigned to an associate or contractor?
- Yes No Are sprinkler heads protected by metal guards?
- Yes No Is proper clearance maintained below sprinkler heads?
- Yes No Are portable fire extinguishers provided in adequate number and type?*
- Yes No Are fire extinguishers mounted in readily accessible locations?*
- Yes No Are fire extinguishers recharged regularly with the recharge date noted on an inspection tag?*
- Yes No Are associates periodically instructed in the use of extinguishers and fire protection procedures?*

*(NOTE: Use of fire extinguishers is based on company policy regarding associate fire fighting in your Emergency Action Plan and local fire code.)

Completed by: _____

Date: _____

ATTACHMENT E: EXITS CHECKLIST

Use this checklist to evaluate compliance with OSHA's standard on emergency exit routes.

- Yes No Is each exit marked with an exit sign and illuminated by a reliable light source?
- Yes No Are the directions to exits, when not immediately apparent, marked with visible signs?
- Yes No Are doors, passageways, or stairways that are neither exits nor access to exits, and which could be mistaken for exits, marked "NOT AN EXIT" or other appropriate marking?
- Yes No Are exit signs provided with the word "EXIT" in letters at least six inches high and with lettering at least 3/4 inch wide?
- Yes No Are exit doors side-hinged?
- Yes No Are all exits kept free of obstructions?
- Yes No Are there at least two exit routes provided from elevated platforms, pits, or rooms where the absence of a second exit would increase the risk of injury from hot, poisonous, corrosive, suffocating, flammable, or explosive substances?
- Yes No Is the number of exits from each floor of a building and from the building itself appropriate for the building occupancy? (NOTE: Do not count revolving, sliding, or overhead doors when evaluating whether there are sufficient exits.)
- Yes No Are exit stairways that are required to be separated from other parts of a building enclosed by at least one-hour fire-resistant walls (or at least two-hour fire-resistant walls in buildings over four stories high)?
- Yes No Are the slopes of ramps used as part of emergency building exits limited to one foot vertical and 12 feet horizontal?
- Yes No Are glass doors or storm doors fully tempered, and do they meet the safety requirements for human impact?
- Yes No Can exit doors be opened from the direction of exit travel without the use of a key or any special knowledge or effort?
- Yes No Are doors on cold storage rooms provided with an inside release mechanism that will release the latch and open the door even if it's padlocked or otherwise locked on the outside?
- Yes No Where exit doors open directly onto any street, alley, or other area where vehicles may be operated, are adequate barriers and warnings provided to prevent associates from stepping into the path of traffic?
- Yes No Are doors that swing in both directions and are located between rooms where there is frequent traffic equipped with glass viewing panels?

Completed by: _____

Date: _____

**ATTACHMENT F: FLAMMABLE & COMBUSTIBLE
MATERIALS CHECKLIST &
MONTHLY FIRE EXTINGUISHER
INSPECTION CHECKLISTS**

ATTACHMENT F: FLAMMABLE & COMBUSTIBLE MATERIALS CHECKLIST

Use this checklist to evaluate compliance with OSHA's standards on flammable and combustible materials:

- Yes No Are combustible scrap, debris, and waste materials such as oily rags stored in covered metal receptacles and removed from the worksite promptly?
- Yes No Are approved containers and tanks used for the storage and handling of flammable and combustible liquids?
- Yes No Are all connections on drums and combustible liquid piping vapor and liquid tight?
- Yes No Are all flammable liquids kept in closed containers when not in use?
- Yes No Are metal drums of flammable liquids electrically grounded during dispensing?
- Yes No Do storage rooms for flammable and combustible liquids have appropriate ventilation systems?
- Yes No Are NO SMOKING signs posted on liquefied petroleum gas tanks?

- Yes No Are all solvent wastes and flammable liquids kept in fire-resistant covered containers until they are removed from the worksite?
- Yes No Is vacuuming used whenever possible rather than blowing or sweeping combustible dust?
- Yes No Are fuel gas cylinders and oxygen cylinders separated by distances or fire-resistant barriers while in storage?
- Yes No Are fire extinguishers appropriate for the materials in the areas where they are mounted?*
- Yes No Are appropriate fire extinguishers mounted within 75 feet of outside areas containing flammable liquids and within 10 feet of any inside storage area for such materials?*
- Yes No Are extinguishers free from obstruction or blockage?*
- Yes No Are all extinguishers serviced, maintained, and tagged at least once a year?*
- Yes No Are all extinguishers fully charged and in their designated places?*
- Yes No Where sprinkler systems are permanently installed, are the nozzle heads directed or arranged so that water will not be sprayed into operating electrical switchboards and equipment?
- Yes No Are NO SMOKING signs posted in areas where flammable or combustible materials are used or stored?
- Yes No Are safety cans utilized for dispensing flammable or combustible liquids at the point of use?
- Yes No Are all spills of flammable or combustible liquids cleaned up promptly?
- Yes No Are storage tanks adequately vented to prevent the development of an excessive vacuum or pressure that could result from filling, emptying, or temperature changes?

*(NOTE: Use of fire extinguishers is based on company policy regarding associate fire fighting in your Emergency Action Plan and local fire code.)

Completed by: _____

Date: _____

ATTACHMENT F: FIRE EXTINGUISHER MONTHLY INSPECTION CHECKLIST

Inspector: _____

Date: _____

Fire extinguishers shall be inspected before being placed in service and yearly thereafter. Fire extinguishers are tagged with the month and year of the last annual inspection.

All fire extinguishers are required to be visually inspected monthly. If the unit is in satisfactory condition for use, the inspector shall write the date and his or her initials on the monthly inspection tag provided on the extinguisher.

If the fire extinguisher is missing, used, or damage is found, it must be replaced with an operable extinguisher.

Use the following checklist when performing monthly fire extinguisher inspections:

		Y	N	N/A
1	Is the extinguisher in a designated location and identified with a sign?			
2	Is the extinguisher free from obstructions to access or visibility?			
3	Are operating instructions are facing out and legible?			
4	Are safety seals and tamper indicators broken or missing?			
5	Is the extinguisher full? (Check fullness by lifting or weighing)			
6	Is there any obvious physical damage? (Corrosion, cracked or dry-rotted hoses, bent or cracked hose couplings, etc.)			
7	Is the pressure gauge indicator in the operable range or position?			
8	For dry chemical units, check the crimped sleeves connecting the hose line to the handle and the hose to the cylinder. Are these sleeves bent, deformed, or cracked?			
9	For wheeled units, are the tires, wheels, carriage, hose, and nozzle in operable condition?			

ATTACHMENT G: EMERGENCY EVACUATION DRILLS

EMERGENCY EVACUATION DRILL COMPLETION FORM

Date: _____ Affected Department(s): _____ _____	Type of Drill Performed: <input type="checkbox"/> Fire <input type="checkbox"/> Tornado <input type="checkbox"/> Earthquake <input type="checkbox"/> Spill/Release <input type="checkbox"/> Active Shooter <input type="checkbox"/> Other: _____		
	YES	NO	N/A
Did the alarm system appropriately alert all employees of the emergency/was it able to be heard above ambient noise?			
Were all employees aware of where to seek shelter and appropriately evacuate to the designated area?			X
Was a head count taken to account for all evacuated employees?			X
Were all employees accounted for?			X
Did any personnel not evacuate?			X
Were first aid kits located in the designated areas and appropriately stocked?			
Were fire extinguishers located in the designated areas and inspected?			
Identified Deficiency	Details	Corrective Action	Completion Date
<input type="checkbox"/> Faulty equipment			
<input type="checkbox"/> Failure to evacuate			
<input type="checkbox"/> Blocked Exits			
<input type="checkbox"/>			
<input type="checkbox"/>			
<input type="checkbox"/>			
Drill Effectiveness: It took _____ minutes for all employees to assemble at the meeting area.			
<input type="checkbox"/> Success <input type="checkbox"/> Failure (Re-attempt the drill once corrective actions have been implemented.)			

Supervisor Signature

Date

ATTACHMENT H: TRAINING DOCUMENTATION

OSHA's Employee Responsibilities

- Read the OSHA Poster at the workplace.
- Comply with all applicable OSHA standards.
- Follow all lawful employer safety and health rules and regulations and wear or use prescribed protective equipment while working.
- Report hazardous conditions to the supervisor.
- Report any work-related injury or illness to the employer, and seek treatment promptly.
- Exercise rights under the Act in a responsible manner.

New Hire Training Summary:

The following items must be reviewed with associates upon hire.

- Review of the OSHA standards pertaining to fire safety and evacuation, including how it can be accessed
 - OSHA requires that all companies have an evacuation program and/or a fire prevention program
 - The OSHA regulations are kept inside the Company Fire Safety & Evacuation Program.
- Review of the Fire Safety & Evacuation Program, including how it can be accessed
 - Company-specific emergency evacuation procedure including exit routes, alarm systems, and assembly points
 - Location of the Fire Safety & Evacuation Program and that it is readily available for review.
- Proper response and notification in the event of an emergency
 - Talk about the company-specific procedures for alerting fellow co-workers, using fire extinguishers to fight a fire, and who to notify in the event of an emergency.
- Recognition of potential fire hazards
 - Convey the different company-specific fire hazards dealing with fuel sources (flammable and combustible liquids, combustible material, etc.) and any ignition sources (welding, cutting, grinding, etc.)
- Housekeeping practices
 - Proper storage of flammable and combustible liquids and material.
 - Any ignition sources need to be in an area away from any fuel source.
 - Work area cleanliness needs to be stressed.
- Instruction on the use of portable fire extinguishers (as determined by company policy)

Upon completing the review of the above information, have new associates sign the new hire training log on the following page.

