

**SHORT SERVICE EMPLOYEE
MANAGEMENT PROGRAM**

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EFFECTIVE DATE : **01/2019**
REVIEW DATE : **03/2023**
REVISION NUMBER : **7**

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1. PURPOSE

This program has been implemented to ensure that Roux Associates, Inc. and its affiliated companies, Roux Environmental Engineering and Geology, D.P.C., and Remedial Engineering (collectively, “Roux”) employees and Subcontractor short service employees are identified, appropriately supervised, trained, and managed in order to prevent accidents such as personal injury, injury to others, environmental damage, and/or property damage. This is a requirement for all employees and subcontractors throughout the firm. In addition, there are other requirements specific to ExxonMobil policies for all their projects, which are identified where applicable below.

2. ROLES AND BACKGROUND

Short Service Employee (SSE)

A Roux employee or a Roux subcontractor employee with less than six (6) months continuous service in the same job type or less than six (6) months continuous service with their current employer is considered a Short Service Employee (SSE). Variances to the SSE program may apply in some circumstances, such as Roux Senior level employees with ten (10) plus years of experience but new to the firm. In such cases, the Operations Manager (OM) and Office Health and Safety Manager (OHSM) shall consult with the Corporate Health and Safety Director (CHSD) on the proper implementation of the SSE program to suit their roles and responsibilities within the firm.

The Roux SSE process was developed and periodically updated to satisfy all expectations included in ExxonMobil’s Environmental Services Short Service Worker Guidance. Roux senior management will, at a minimum, perform an annual assessment of the Short Service Employee Management Program to determine its effectiveness and identify improvement opportunities. It should be noted that ExxonMobil refers to SSE as Short Service Workers or SSWs. For all ExxonMobil projects, an SSE is defined as a Roux employee or a Roux subcontractor employee with less than six (6) months of ExxonMobil worksite experience or has not worked on an ExxonMobil worksite in the last two (2) years.

SSEs shall not exceed 50% of Roux’s field workforce at any job site without prior written approval from the Operations Manager (OM) and when required by the client contract or program, approval from the designated client representative. A single-person crew cannot be an SSE unless there is prior written approval from the OM, which is based on a thorough evaluation of the project’s technical, health, and safety considerations.

The SSE process excludes workers not performing physical work onsite, visitors, regulatory agency staff, client employees or affiliates, and members of contractor management staff. In addition, some aspects of this SSE process may not be appropriate for short-duration workers (i.e., specialized workers onsite for a short period to perform a particular task and unlikely to return). If the SSE process is deemed not appropriate, the individual Project Manager (PM), in consultation with the OHSM, will develop a case-specific risk mitigation plan to address these short-duration workers or consider subcontracting the task through a long-duration contractor who has an effective SSE program.

Site Safety Mature Person (SSMP)

An SSMP is a worker working on any site (i.e., ExxonMobil) that has demonstrated knowledge and skills regarding site hazards, hazard management, and safe working practices and is qualified to act as an SSMP. Our “graduation” process includes administering a behavior-based safety (BBS) written test followed by a one-on-one interview with a senior safety or PM of the project team to ensure competence. Graduation to a SSMP typically takes (6) total months of relevant work experience. At ExxonMobil sites, graduation in less than (6) months requires approval by the ExxonMobil PM.

Mentor

A Mentor is a designated person(s) who is responsible and accountable for guiding and monitoring performance of SSEs in the field. The Mentor cannot be another SSE. The Mentor can be a member of the same working team, but should not be an employee of ExxonMobil or any of its affiliates. The Mentor is a SSMP and has demonstrated knowledge and skills with regard to site and task-related hazards, hazard management, and safe working practices and can communicate with the SSE. The Mentor is trained and knowledgeable in BBS concepts such as but not limited to Loss Prevention System ® (LPS®) tools, which include Loss Prevention Self Assessments (LPSAs), Loss Prevention Observations (LPOs), and Job Loss Analysis (JLA). All projects outside of ExxonMobil utilize similar tools such as the Self-Performance Self-Assessment (SPSA), Roux Peer Observation (RPOs), and Job Safety Analysis (JSAs). The Mentor should have a positive safety attitude and understanding of ExxonMobil's (if applicable) and Roux's corporate safety cultures. The Mentor should be capable of practicing Safety Leadership skills but does not necessarily have to be the SSE's Supervisor. The Mentor should have received appropriate training and be qualified for the role by Roux management. The Mentor is expected to either be onsite with the SSE or assign a SSMP to be onsite with the SSE until the SSE graduates and becomes a SSMP. Deviation from a Mentor or SSMP being onsite with the SSE while conducting field operations requires approval by the OM, Project Principal, or the Client PM (in the case of ExxonMobil work).

Supervisor

A Supervisor is the designated person(s) responsible and accountable for the overall stewardship of the SSE Management Program for each project or office. The Supervisor shall be a senior member of the Roux management team (i.e., Group Leader).

3. ORIENTATION, TRAINING, AND CLEARANCE***Pre-Assignment Orientation, Training, and Clearance***

An initial First Day employee orientation is required before the SSE can perform fieldwork. Orientation must be conducted by the OM or OHSM or the designated Supervisor of the SSE. The initial orientation shall, at a minimum, communicate the following information:

- Even though risks do exist, accidents and injuries are preventable;
- Each worker has a personal responsibility for their safety and the safety of others both on and off the job;
- No business objective is so vital that it will be pursued at the sacrifice of safety;
- Stop work authority if any site condition becomes unsafe
- Safe conduct is a condition of employment;
- Work is done well only if it is done safely;
- Roux employees are expected to have the best safety performance;
- Review of Roux's Safety Procedures and Practices;
- General requirements for Personal Protective Equipment;
- Injury reporting and medical follow-up procedures;
- Requirements regarding participation in safety meetings, LPSAs/ SPSAs, JLAs/JSAs, and LPOs/ RPO process; and
- Requirements of this SSE Management Program.

Other pre-assignment training (or verification of prior training) is also typically required and will be determined by the SSE's OM, OHSM, and Supervisor. Examples of this additional training include OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training, one-on-one Safety and Procedures Review with the OHSM, BBS training, client-specific training program requirements (i.e., LPS[®], railroad worker safety, etc.), and job skills training requirements specific to immediate job tasks (i.e., various field procedures training, equipment usage, etc.).

Medical clearance and drug testing clearance are also required before the performance of fieldwork on some sites.

Project and Site-Specific Orientation and Training

Many Roux projects have different requirements that are client-specific or site-specific in nature. The Project Principal (PP) (or PM if delegated this responsibility by the PP) must ensure the SSE assigned to their projects is provided orientation and training concerning the client and site-specific requirements. Minimum site-specific orientation shall include operations overview, review of the site-specific HASP, emergency action plan, facility sign-in and sign-out, hazard identification and reporting, safety data sheet (SDS) information, and specialized gas testing, if applicable. In addition, any restrictions on communications with non-Roux personnel, site access, or operation of site equipment (both Roux and Client owned) should be reviewed. Roux has established and implemented a health and safety job planning process that addresses the significant components outlined above.

Client-specific and site-specific orientation topics shall also include work permit training, reporting incidents and hazards, emergency response procedures, appropriate PPE requirements, and general importance and use of BBS tools (which can consist of LPS[®] Minimum Safety Expectations/Life Saving Actions and consequences).

Additional SSE Training

While classified as an SSE, the employee must actively seek out and participate in available training opportunities. The SSE will utilize the SSE Form (see Appendix A) to track the completion of training and other experience gained while an SSE. Based on roles and responsibilities, two SSE Forms are provided; one is for Technician/Staff/Project Level Employees while another is for Senior Level Employees. Specific training that is recommended to be completed within the first six (6) months of employment for the employee to graduate from SSE status is listed on the SSE Form. Individuals completing the training are required to sign off on each type of training.

4. NOTIFICATIONS AND RESPONSIBILITIES

The following individuals have responsibilities for notification under this program.

Operations Manager (OM) and SSE Supervisor (AKA: Group Leader): Have the responsibility of notifying the PP when a SSE employee is assigned to their project. They are also responsible for confirming that field assessments are conducted to verify the effectiveness of the SSE's performance.

SSE: Roux employees who are SSEs are required to identify themselves as such to the Roux PM before reporting to the job Site and to provide the PM with an up-to-date copy of their Roux SSE Training and Assignments Documentation Form. SSEs must wear company-supplied fluorescent green hard hats (or other project-specific distinct identification) when in the field to be easily identifiable.

Project Principals (PPs) and Project Managers (PMs): PPs are responsible for notifying the PM when a SSE is assigned to their project and ensuring the SSE Management Program's requirements are adhered to on their projects. When required by the Client contract or program, the Roux PP (or PM if delegated this authority by the PP) shall provide applicable notice to the client's designated representative regarding SSEs being assigned to fieldwork. The notice should be completed in advance using any applicable client SSE notification forms and shall be acknowledged/approved by the client representative before the SSE commencing work.

The Roux PM shall notify the Field Manager/Supervisor who will be responsible for field mentoring/training of the SSE on their project and for making sure everyone on the job site is aware that SSEs are present. All personnel are expected to help the SSE and to explain potential hazards before each job. The Roux PM shall maintain a list of SSE workers, their entry date, and the date they complete the SSE process. SSE checklist items should be discussed with the SSE while onsite.

The PP and PM shall ensure the requirements of this SSE Program are implemented for all subcontractor employees performing fieldwork on the Firm's projects. Subcontractors are required to alert Roux of any plans to have SSEs onsite.

Mentor: The PP (or PM if delegated this authority by the PP) must designate an onsite Supervisor for the SSE. A Mentor shall be capable of demonstrating safety leadership, will not currently be a SSE, have a positive safety attitude, be capable of providing effective training/coaching, and have good communication skills. The Mentor will have a positive safety attitude, will be motivated, and is to have a solid working knowledge of client-specific and site-specific safety programs/culture and requirements (e.g., ExxonMobil LPS® program). An SSE may only work under the direct onsite supervision of the designated Supervisor who, as one of their duties, serves as a mentor/trainer in safety for the SSE. The onsite Supervisor/Mentor must provide close supervision and not allow the SSE to perform any task in which the SSE has not been adequately trained. The onsite Supervisor will review with the SSE any hazards associated with the task and review all emergency equipment and response procedures. The Mentor must actively work with and engage the SSE daily to provide mentoring and monitoring of the SSE concerning safe work practices and identification of hazards.

Site-specific Mentor responsibilities shall also include applicable work permit training, reporting of incidents and hazards, emergency response procedures, appropriate PPE requirements, and general importance and use of Roux's BBS tools. After each field assignment, the onsite Supervisor/Mentor will complete the applicable section of the employee's SSE form to document the work experience and provide feedback to the Project Manager and the OM and Project Principal regarding the SSE's performance and capabilities.

5. SHORT SERVICE EMPLOYEE MANAGEMENT PROGRAM EXCEPTIONS

Any exception to this Short Service Employee Management Program must be approved in writing by the OM and PP and, when required by the client contract or program, by the designated client representative. An exception to the onsite Supervisor / Mentor requirement and 50 percent SSE limitation may be granted for activities typically performed by one Roux employee (e.g., fieldwork oversight, field inspections, site walks, etc.). To be eligible for an exception, the employee must have had training and demonstrated prior experience in the specific work area. Furthermore, the PM shall provide additional communications during each day to review safety requirements and work progress to ensure work is being performed safely and in accordance with expectations.

An exception to the 50% SSE limitation may be granted for work that requires increased staffing levels by Roux Or Roux subcontractors (e.g., construction projects). The exception request must be submitted in writing, using a form similar to the attached Roux SSE Exception Form, by the contractor, outlining SSE expectations limitations, types of work to be performed, and mitigative measures that will be taken to minimize risks associated with the increased utilization of SSEs. The OM must approve the exception request and when required by the client contract or program, approval from the designated client representative.

Exceptions to the Short Service Employee Management Program at ExxonMobil sites must be approved in writing by the ExxonMobil PM in consultation with Roux PM.

6. PROGRAM COMPLETION

To be removed from SSE status, the OM and the SSE's Supervisor must be convinced that the SSE has a working knowledge of Roux and any applicable client Safety Policies and has demonstrated safe work practices and behavior. In addition, the SSE must have completed all required initial SSE training (as documented in their SSE Documentation Form) and have performed all activities without a serious loss incident (i.e., property damage, OSHA-Recordable injury). If the OM and Supervisor are convinced of the SSE's capabilities, the OM may remove the employee from the Roux SSE process by completing and signing the applicable section of the employee's SSE Form. The signed form will then be forwarded to the Health and Safety Department to be included in the employee's personnel file. If the SSE has been actively working on a client site under client-specific SSE requirements, the PM may also need approval from the client representative.

If, within six (6) months, the SSE is not capable of demonstrating the appropriate level of task, project, or safety knowledge, they shall be restricted from performing field activities alone until a point in time when they qualify to do so or are to be removed from the site.

Additionally, all SSEs must successfully complete an LPS® assessment or equivalent, demonstrate sufficient knowledge to meet the SSE requirements and be removed from the SSE process. This is the responsibility of the OM and OHSM to manage within their respective office. SSEs will also complete a one-on-one interview with their associated Supervisor to confirm that they are ready to complete the program. At ExxonMobil sites, completion of the SSE program in less than six months needs to be approved by the ExxonMobil Project Manager.

7. SUBCONTRACTORS

All subcontractors who supply field personnel to Roux job sites must implement a program that meets or exceeds the above expectations and any additional requirements that may be required on a client or site-specific basis. Also, subcontractors must alert Roux of any plans to have SSEs onsite.

Appendix A
Short Service Employee Training and Assignments Documentation Forms



Short Service Employee Training and Assignments Documentation Form
Technician/Staff/Project Level Employees

I. SSE Information

SSE Name: _____ Current Job Title: _____
Date of Employment: _____ Experience: ____ Years Current Position Experience: ____ Years ____ Mos.
SSE Mentor: _____ Designated SSE Supervisor: _____

Table with 5 columns: Requirement, Date Completed, SSE Initial, Mentor / Site Supervisor Initials, Supervisor Initials. Rows include: D&A Screening/OSHA Medical Surveillance Physical, OSHA 40-Hour HAZWOPER Training, OSHA 8-Hour HAZWOPER Supervisor Training, Roux Corporate Health and Safety Manual Review, Safety, Policies, and Procedures Orientation with OM or SSE Supervisor, LPS Standard / Roux Behavior-Based Safety Training, Incident Notification and Emergency Response Procedures Review, Completion of 20 LPSAs/SPSAs, Completion of 2 LPOs/RPOs (Roux Peer Observations), Completion of 6 Hazard Identifications, Draft 2 H&S Job Planning Forms, Lead 2 H&S Kickoff Meeting, Client Work Permit Procedures (if applicable), Client-Specific Training (if applicable) (LIRR, Amtrak, NJ Transit), Defensive Driving (i.e., Smith System), Field Notebook, Subcontractor Oversight, Site Supervisor / SHSO, Lead 2 Toolbox Safety Meetings, Job Safety Analysis (create 1 new JSA/Modify Site JSA)

III. Field Assignments (See reverse for additional assignment while SSE)

Table with 6 columns: Site, Work Task(s), From, To, Site Supervisor, Project Principal. Multiple rows for assignment tracking.

IV. Release from SSE Status

Based upon the SSE's successful completion of the above training and assignments, the SSE's Mentor(s), Supervisor, and OM indicated below have been convinced that the SSE has a working knowledge of both Roux and any applicable Client Safety Policies, and has demonstrated safe work practices and behavior. Additionally, the SSE has completed all applicable SSE training (as documented above) and performed all activities without a serious loss incident (i.e., property damage, OSHA recordable injury). The individual is thereby removed from status as an SSE.

(SSE Mentor(s)) _____ (SSE Supervisor) _____
(Operations Manager) _____ (Date) _____



Short Service Employee Training and Assignments Documentation Form Senior Level Employees

I. SSE Information

SSE Name: _____ Current Job Title: _____

Date of Employment: _____ Experience: _____ Years Current Position Experience: _____ Years _____ Mos.

SSE Mentor: _____ Designated SSE Supervisor: _____

II. Orientation, Training and Clearance Requirements	Date Completed	SSE Initial	Mentor / Site Supervisor Initials	Supervisor Initials
D&A Screening/OSHA Medical Surveillance Physical	_____	_____	_____	_____
OSHA 40-Hour HAZWOPER Training	_____	_____	_____	_____
OSHA 8-Hour HAZWOPER Refresher	_____	_____	_____	_____
OSHA 8-Hour HAZWOPER Supervisor Training	_____	_____	_____	_____
Roux Corporate Health and Safety Manual Review	_____	_____	_____	_____
Safety, Policies, and Procedures Orientation with OM or SSE Supervisor (including required PPE)	_____	_____	_____	_____
LPS® Standard / Roux Behavior-Based Safety Training	_____	_____	_____	_____
Incident Notification and Emergency Response Procedures Review	_____	_____	_____	_____
Completion of 5 LPSAs/SPSAs Discussions with Staff	_____	_____	_____	_____
Completion of 2 LPOs/RPOs (Roux Peer Observations)	_____	_____	_____	_____
Completion of 2 Field Audits	_____	_____	_____	_____
Prepare/Review 3 HASPs	_____	_____	_____	_____
Draft 3 H&S Job Planning Forms	_____	_____	_____	_____
Lead 3 H&S Kickoff Meeting	_____	_____	_____	_____
Client Work Permit Procedures (if applicable)	_____	_____	_____	_____
Client-Specific Training (if applicable) (LIRR, Amtrak, NJ Transit)	_____	_____	_____	_____
Subcontractor Oversight (if applicable)	_____	_____	_____	_____
Site Supervisor / SHSO (if applicable)	_____	_____	_____	_____
Lead 2 Toolbox Safety Meetings	_____	_____	_____	_____
Job Safety Analysis (create 1 new JSA/Modify Site JSA)	_____	_____	_____	_____

III. Field Assignments (See reverse for additional assignment while SSE)

Site	Work Task(s)	From:	To:	Site Supervisor	Project Principal
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

IV. Release from SSE Status

Based upon the SSE's successful completion of the above training and assignments, the SSE's Mentor(s), Supervisor, and OM indicated below have been convinced that the SSE has a working knowledge of both Roux and any applicable Client Safety Policies, and has demonstrated safe work practices and behavior. Additionally, the SSE has completed all applicable SSE training (as documented above) and performed all activities without a serious loss incident (i.e., property damage, OSHA recordable injury). The individual is thereby removed from status as an SSE.

(SSE Mentor(s))

(SSE Supervisor)

(Operation Manager)

(Date)

Appendix B
Example Roux SSE Exception Form

Roux SSE Exception Form

This form is to be filled out and approved by the Roux Operations Manager and Project Principal whenever the onsite Supervisor requirement and/or 50% SSE limitation will not be met on the project.

IV. Variance Information

Variance Justification: (What are the current circumstances and what will be done to ensure an acceptable level of risk?)	
Alternatives to Variance: (If the variance is denied, what are the alternatives to completing the scope of the work? Briefly detail the cost and operational impact of the alternatives.)	

List the steps to be taken to manage the SSE risk to an acceptable level:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

V. Variance Review and Approvals

Variance Expiration Date: _____

Project Principal Approves Denies
Signed: _____ Date: _____

Operations Manager Approves Denies
Signed: _____ Date: _____

Appendix C
Short Service Employee Mentor Documentation Form

Short Service Employee Mentor Documentation Form

I. Mentor Information

Mentor Name: _____ Current Job Title: _____

Date of Employment: _____ Experience: _____ Years Current Position Experience: _____ Years _____ Mos.

II. Demonstrated Experience

The Mentor of any SSE will have demonstrated the following as endorsed by their Supervisor or Operations Manager.

Requirement

- Is not a Short Service Employee
- Is LPS® trained and is capable of providing quality review of LPS® tools effectively
- Demonstrates proper usage of SPSAs and actively coaches others
- Has developed multiple JSAs
- Understands emergency response procedures and can explain them to others
- Is proficient in preparing and reviewing work permits
- Understands injury reporting and case management responsibilities and is capable of explaining them to employees and subcontractors
- Has working knowledge of hazard identification, near loss, and loss reporting and has participated in multiple near loss investigations
- Demonstrates the ability to intervene when required during project execution
- Leads Toolbox Safety Meetings as part of project execution

III. Approval of Employee to Participate in SSE Program as a Mentor

Based upon the employee's demonstration of the above attributes, the employee's Supervisor / OM indicated below has been convinced that the employee is capable of being an effective Mentor as part of the SSE Program.

(Supervisor / Operations Manager)

(Date)