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Brunel Energy, Inc.

Line of Fire

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, “the Company,” has established a Line of Fire program to prevent injuries that result from moving objects and energy sources.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. A simple definition of “**line of fire**” is being in harm’s way. Line of fire injuries occur when the path of a moving object or the release of hazardous substances intersects with an individual’s body.
- 3.2. **Caught-in or between injuries** are injuries resulting from a person being squeezed, caught or crushed, pinched, or compressed between two or more objects, or between parts of an object.
- 3.3. **Struck-by injuries** are produced by forcible contact or impact between the injured person and an object or piece of equipment.
- 3.4. **Released energy injuries** are caused by an object or tool under pressure that is removed or a projectile shooting out of malfunctioning equipment.

4. Responsibilities

- 4.1. Manager(s) and HSE Supervisors shall:
 - 4.1.1. Ensure all employees complete the required training prior to starting work.
 - 4.1.2. Complete risk assessments to identify potential hazards.
 - 4.1.3. Establish and enforce barriers and exclusion zones.
 - 4.1.4. Implement, support, and enforce the requirements of this policy in their locations.
- 4.2. Employee(s) shall:
 - 4.2.1. Stay aware of their surroundings and identify potential hazards
 - 4.2.2. Report potential hazards to their supervisor immediately

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- 4.2.3. Wear the proper personal protective equipment (PPE), which may include but is not limited to gloves, safety glasses, and hard hats.
- 4.2.4. Ensure that tools and equipment are only used for the purpose of which they are designed.
- 4.2.5. Complete all required training prior to starting work.
- 4.3. Subcontractor(s) must follow the safety and health guidelines in this policy, wear or use required protective equipment while working, and report all hazardous conditions to his or her supervisor.

5. Requirements

- 5.1. Exposures to moving objects, vehicles, pressure releases, and dropped objects shall be determined prior to beginning work.
- 5.2. Line of fire hazards shall be discussed and evaluated during the preparation of the Job Hazard Analysis. The Company will consider if the work or task will involve the release of energy in a manner that may cause injury to an employee.

6. Procedure

- 6.1. Risk Assessment
 - 6.1.1. Risk of exposures to moving objects, vehicles, pressure releases, and dropped objects shall be determined prior to beginning work or any change in workflow.
 - 6.1.2. A pre-job risk assessment and safety discussion prior to commencement of the task shall be conducted to:
 - 6.1.2.1. Identify hazards,
 - 6.1.2.2. Provide mitigation for those identified hazards,
 - 6.1.2.3. Ensure the ongoing effectiveness of mitigations.
 - 6.1.3. When determining proper position of people during work, consider:
 - 6.1.3.1. Pressure Releases
 - 6.1.3.2. Vehicles and heavy equipment
 - 6.1.3.3. Suspended and swinging loads
 - 6.1.3.4. Moving objects
 - 6.1.3.5. Equipment in stress
 - 6.1.3.6. Pinch points
- 6.2. Exclusion zones shall be established and maintained below overhead work where there is a danger of tools, materials or equipment falling and striking employees below.

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- 6.3. Tools, debris, and other small objects shall be protected from falling to a lower level through the installation of toeboards, screens, or guardrail systems, or through the erection of debris nets, catch platforms, or canopy structures that contain or deflect the falling objects. When the falling objects are too large, heavy or massive to be contained or deflected by any of the above-listed measures, the Company shall place such potential falling objects away from the edge of the surface from which they could fall and shall secure those materials as necessary to prevent their falling.
- 6.4. Personal Protective Equipment (PPE)
 - 6.4.1. Suitable PPE shall be provided and worn in accordance with the risk assessment and work policies.
 - 6.4.2. Safety glasses or goggles shall be worn any time work operations present an eye hazard.
 - 6.4.3. Pedestrians shall always wear highly visible personal protective equipment (PPE) such as hard hats and reflective vests in facilities where forklifts are present.
 - 6.4.4. Hard hats shall be worn anywhere there is a potential for objects falling from above or where there is risk of bumps to the head from fix objects.

7. Training

- 7.1. All employees shall receive training upon initial hire and annually thereafter, or when an employee is not complying with safety-related work practices or when workplace changes necessitate the use of safety-related work practices that are different from those the employee would normally use.
- 7.2. The training required by this program may be of the classroom or on-the-job type. The degree of training provided must be determined by the risk to the employee.
- 7.3. A demonstration of the employee's knowledge shall be documented. This can be via written test, documentation of successful completion of training, and by on-site demonstration of understanding through workplace observations. Each employee shall be evaluated at least annually to ensure continued understanding and competence.
- 7.4. Training shall be documented.

8. Recordkeeping

- 8.1. Training records, licenses, and work permits shall be kept and maintained.

9. Reference

- 9.1. 1926.100 – Head protection
- 9.2. 1926.451(h), Falling object protection