# EXHIBIT TABLE OF CONTENTS


| **Description** (including Part # \| Item # as applicable) | **Page #** |
|---|---|
| Cover Page | 2 |
| Table of Contents | 3 |
| 1.0 Purpose | 4 |
| 2.0 Safety Philosophy Statement | 4 |
| 3.0 Types of Written Safety Plans In Place | 5 |
| 4.0 Employer/Employee Responsibilities | 5 |
| 5.0 Disciplinary Policy | 6 |
| 6.0 Health & Safety Program Procedures | 6 |


## Exhibits/Figures/Tables


| | |
|---|---|
| Organizational Chart | 7 |

# SAFETY AND HEALTH PLAN
# Corporate Safety Policies and Procedures

AERC.Com, Inc.
2591 Mitchell Avenue
Allentown, PA 18103

AERC.Com, Inc.
30677 Huntwood Avenue
Hayward, CA 94544

AERC.Com, Inc.
4317 – J Fortune Place
West Melbourne, FL 32904

NOTE:
Revisions to the Plan will be adopted for ALL AERC.com, Inc. operating locations – implementing program elements as appropriate to the location business activities, i.e., Hazardous/Universal Waste Management vs. E-Scrap Management. In other words, AERC Recycling Solutions locations vs. Com-Cycle locations.
9-09

# Table of Contents

1.0 Purpose .....1

2.0 Safety Philosophy Statement .....1

3.0 Types of Written Safety Plans In Place .....2

4.0 Employer/Employee Responsibilities .....2

5.0 Disciplinary Policy.....3

6.0 Health & Safety Program Procedures .....3

## 1.0 Purpose

In order to establish and organize good safety practices, this General Safety Policies and Procedures Written Plan summarizes information regarding safety policies and procedures at AERC.Com,Inc. The Regulatory Affairs Department has overall responsibility for the review of applicable regulations and the associated development of health & safety policies. The management of each operating facility, under the charge of the Facility and/or Operations Manger is responsible for implementing the requirements noted here-in. This plan, in addition to any related health & safety plan elements as required by the state, is to be kept in the Operations Office at each AERC Recycling Solutions location.

## 2.0 Safety Philosophy Statement

Our safety philosophy has been developed to reflect and communicate the proactive safety attitude maintained at AERC.Com,Inc.

Aerc.Com, Inc. will comply with appropriate safety and health laws and regulations such as those established by:

- The California Occupational Safety and Health Act (Cal/OSHA)
- The Occupational Safety and Health Act (OSHA)
- The EPA (Environmental Protection Agency)
- The DOT (Department of Transportation)
- All other applicable federal, state, and local safety and health regulations.

In addition, our corporate safety philosophy includes the following vision statements:

We believe that the safety of our employees is of utmost importance, along with quality, production, and cost-control. Maintenance of safe operating procedures at all times is of both monetary and human value, with the human value being far greater to Aerc.Com, Inc. our employees, and the community. The following principles support this philosophy:

- All injuries and accidents are preventable through the establishment and compliance with safe work practices and procedures.
- The prevention of bodily injury and safeguarding of health are the first considerations in all workplace actions and are the responsibility of every employee at every level.
- Written safety plans describing the safe work practices and procedures to be practiced in all workplace actions are an essential element of the overall workplace safety program. All employees at every level are responsible for knowing and following the safety practices described in our written safety plans.
- Off the job, all employees should be similarly safe and demonstrate awareness of potential hazards.

## 3.0 Types of Written Safety Plans In Place

Because we care about our employees and strive to provide a safe work place, we have put into place a number of written safety plans. These written plans provide guidance and direction for the safety issues they cover. The topics covered in written safety plans at AERC.Com,Inc. include the following:

- Hazard Communication
- HAZWOPER
- Emergency Action Plan
- Emergency Response Plan (Allentown, PA only)
- Hearing Conservation
- Lock out / Tag out
- Personal Protective Equipment
- Bloodborne Pathogen (Allentown, PA only)
- Fire Prevention
- Medical Surveillance
- Respiratory protection
- Laboratory Safety Standard (Allentown, PA only)

## 4.0 Employer/Employee Responsibilities

This section lists responsibilities of employers and employees. These responsibilities are to be taken seriously at all times.

It is the policy of AERC.Com,Inc. to provide a place of employment free from hazards which may cause illness, injury, or death to our employees. It is also Aerc.Com, Inc.'s policy to establish an effective and continuous safety program incorporating educational and monitoring procedures maintained to teach safety, correct deficiencies, and provide a safe, clean working environment. All supervisors, managers, directors, and officers are responsible for the enforcement of safety policies and practices. They must ensure that:

- Their staff members are trained in appropriate safety procedures, including chemical-specific training as required. Individual training files are maintained in the Human resource office for all employees.

- They notify the Manager of Facilities, Safety and Industrial Hygiene and complete the necessary forms if an accident or work-related health problem occurs in their department.

- Equipment and property within their area of responsibility is maintained in a safe, hazard-free condition.

All employees have a responsibility to themselves and to Aerc.Com, Inc. for their safety and the safety of the coworkers. All employees are required to:

- Comply with all federal, state, local and Aerc.Com, Inc. rules and regulations relevant to their work.
- Observe all company rules and regulations related to the efficient and safe performance of their work.
- Integrate safety into each job function and live by this philosophy in the performance of job duties.
- Report or correct unsafe equipment and practices.
- Report any accidents that occur while on the job.

The current organizational structure of the Regulatory Affairs Department is presented in the enclosed figure.

## 5.0 Disciplinary Policy

All safety rules, procedures, and plans in effect at Aerc.Com, Inc. are intended to be followed. Upon violation of any company safety rule, the violating employee will be penalized. The severity of the penalty will be in direct correlation to the severity of the safety violation.

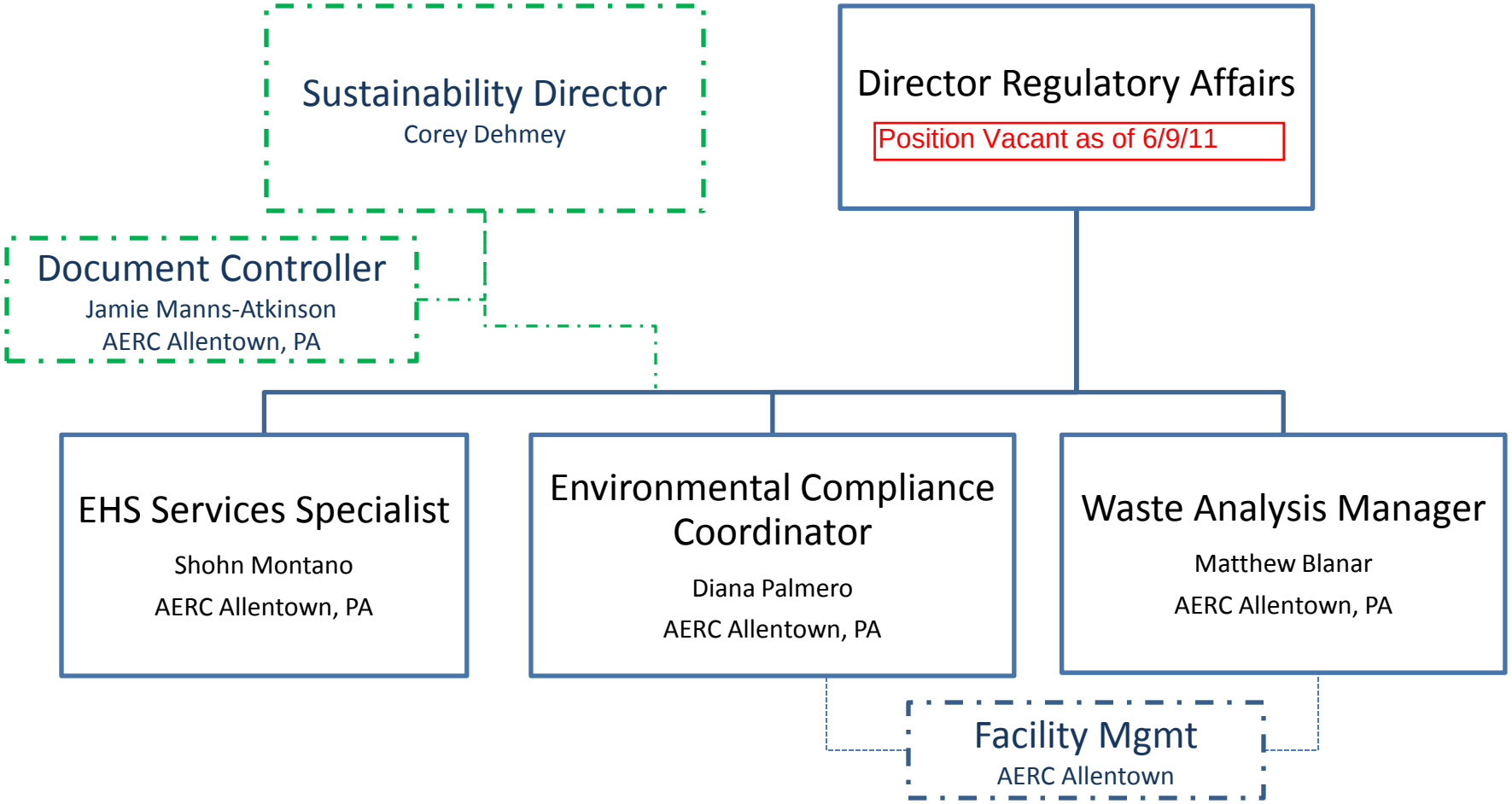
## 6.0 Health & Safety Program Procedures

The list presented on the next page details the Environmental, Health & Safety procedures, procedures and/or policies to be implemented at AERC.com, Inc. operating facilities. This list is currently being updated as part changes in the corporate structure of the regulatory affairs department as well as the implementation of the Quality, Environmental, and Health & Safety Management System (QEHSMS).

# AERC.com, Inc.

## Regulatory Affairs Department

[Reporting to the VP Operations – Mark Kasper]




NOTE: The Regulatory Affairs Department works in direct contact with individual Operations/Facility Managers to administer compliance programs . As such, the Department provides overall support to all operations from the Mitchell Ave, Allentown, PA facility.