

## WGR Southwest, Inc.

### Our Approach to Procedure Writing

Procedures serve a variety of purposes including instruction on how to perform specific tasks, standardization of operations, and teaching and training of new employees. Improved quality control, assurance that safe and environmentally sound work practices are being followed, and incorporation of company policies into routine tasks are some of the benefits of having written local operating procedures.

WGR's approach to writing procedures is simple and natural. First, we meet with the facility manager and determine the company's procedure needs and priorities. Our experience has shown the importance of our clients reviewing recent safety and environmental incidents or near misses which may have occurred at their own facility or similar facilities prior to determining where to begin.

We then send a procedure writer to your facility. It is crucial for the development of the procedure that a Subject Material Expert (SME) who knows the specific details of the procedure be assigned to work with us. We act as a scribe and take detailed notes as the SME describes the procedure step by step. We have found that the more focused time and undivided attention we get from your SME, the more cost effective and accurate the procedure becomes. You may need to assign a different SME for each procedure and therefore plan accordingly. We have also found it beneficial to our clients to have different people at the facility review the procedure steps, especially when there may be more than one way to perform the task. In such cases and where standardization is important, we will note the variations and the facility manager can make the decision as to which way the method will be described in the procedure, followed in actual practice, or taught to new employees.



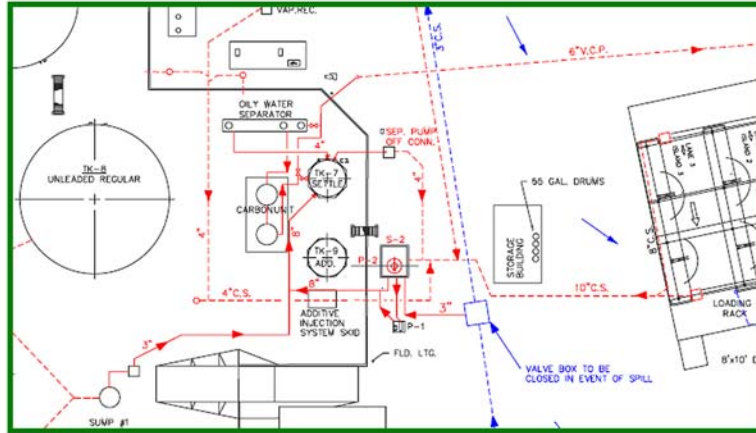
We then take multiple photographs to help identify the step from general to specific or visa versa.



We use photos to identify equipment, safety items or the location of specific items.



We can add specific applications to identify schematics, tables, breakdowns, or graphs, anything which will help clearly identify site or procedure specifics.



Valve	Position	Valve	Position
1	Open	7	Closed
2	Closed	8	Open
3	Closed	9	Closed
4	Closed	10	Open
5	Closed	11	Closed

We can also incorporate company documents which need to be used for a particular procedure whether it's a checklist or training written exam.

We then take all the information we have gathered, place it into our standard format and organize it in a way which can be easily read, understood and followed.

Each procedure page has an identifying header and footer.

US INDUSTRIES	<i>Wastewater System Operation and Testing</i>
Operating Procedure No. : <b>STK-ENV-001</b>	
Original Preparation Date: 17 Apr 07	
Revision Date: 17 Apr 07	
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The header identifies the company, location, procedure description and is assigned a procedure number, preparation and revision date.

The footer identifies the location of the procedure on our server for future access.

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|---|
| <ul style="list-style-type: none"><li>• This document was printed 6/6/07 2:34 PM</li><li>• This document is valid for 24-hours from the date printed.</li></ul> |
| File Name: Truck-loading.doc  |

Once we write the rough draft of the procedure, we have another WGR Procedure Writer review the rough draft to identify any “obvious” errors and correct them prior to reviewing them with the client. We call it a “Peer Review”.

Once the draft is completed, we ask the SME and/or our client contact to review the procedure for accuracy. After revisions have been made, the procedure is then removed from “Draft” status and marked as “Approved”. Because the size of the documents sometimes preclude them from being emailed, the draft and approved procedures are posted on our WGR Procedure Download website to provide 24/7 access by the client.

When there are multiple procedures and multiple site visits, we take our procedures through a “cycle” of reviewing the rough drafts, approving those rough drafts which do not require changes and begin to take notes and photographs for the next round of procedures. Depending on the size and complexity of the procedures and the available time with the SMEs, we can typically gather information on 3 to 10 procedures with each site visit.

If multiple locations use the same procedure, we ask the facility manager and/or the SME to review the procedure from another similar facility and make notes as to which items in the procedure need to be changed to identify “Site Specific Requirements.” If no changes are required, we simply copy the original procedure, exchange site specific photographs, and change the site location in the header of the new site procedure and post it as complete. This can save our client considerable development costs.

WGR’s costs for procedure writing depend on a variety of factors including, the complexity and length of the procedure, availability of the SMEs, availability of reference material, number of revisions due to multiple reviews by the client, and travel to the facility. The average cost for a procedure is approximately \$2,500. However, we have prepared procedures for as low as \$850 and others that have cost up to \$5,000. As we mentioned above, one way to save considerable cost is to look at procedures that have already been written by us for your company and see how closely they match up to your facility’s operations.