

PURPOSE OF THIS BOOKLET

This Safety Booklet is dedicated to the prevention of workplace injuries. You are requested to read it carefully, understand the Simpson and Brown safety rules, and adhere to these safe working practices while performing any work. These instructions are issued for your benefit so that you may exercise the greatest care in looking out for yourself and your fellow workers.

Safety is part of your job, it is as much your duty to be a safe worker as it is to do your work properly. If you are unsure about the correct and safe way to do your job, stop the job and ask your supervisor.

The purpose of this booklet is not to cover all our safety instructions and regulations. This Booklet is to highlight major items and call attention to those dangers and unsafe practices which have frequently been the cause of serious accidents.

SIMPSON & BROWN SAFETY & HEALTH POLICY

The employees and management of S & B believe that all occupational injuries and illnesses can be prevented. Because of this belief, S & B will take all necessary steps to ensure the health and safety of all its personnel. S & B does hereby resolve that:

Any employee can stop work if he or she feels the act is unsafe. This is known "Stop Work Authority".

Management, employees of S & B, and their subcontractors, shall support and cooperate with the safety committee of S & B.

All employees are encouraged to discuss safety matters regardless of employment level.

All injuries, accidents, and near misses will be reported immediately. An investigation and analysis of each will be made to prevent recurrence.

Weekly meetings shall be conducted with each field crew for the dual purpose of a) "tool box" safety lectures; and b) open discussion of any safety matters. Supervisor's attendance at these meetings is mandatory.

Once a year, Simpson and Brown hosts Safety Day. This is a mandatory training day for everyone to attend. The management of S & B is committed to a visible safety program and hereby endorses this policy.

OCCUPATIONAL SAFETY & HEALTH ACT

It is S & B company policy to be in voluntary compliance with the Occupational Safety & Health Act of 1970. We subscribe to the intent and purpose of the Act and endeavor to comply with the rules and regulations adopted by OSHA.

Section 5 of the Occupational Safety & Health Act outlines the duties and responsibilities of the employer and employee. As an employer, Simpson and Brown will comply with Section (5a) of the act, which states: (General Duty Clause)

An employer-

- Shall furnish to each of the employees, a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to the employees.
- Shall comply with occupational safety and health standards promulgated under this Act.

Simpson and Brown expects every employee to strictly follow Section (5b) of the act which states, "Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct."

ACCIDENT PREVENTION

The companies Safety & Loss Control Program requires the constant attention and direction of all personnel. Instinctively, we are all aware of many safety risks. The importance of a safety program which is utilized and enforced cannot be overemphasized. An awareness of the importance of safety in all phases of work must be instilled in all employees.

Protection of personnel from exposure to injury or death is implemented to prevent incidents. In the case of an incident,

an investigation is performed to discover the root cause and learn from what has occurred.

Each employee MUST take part in a daily "Tailboard" safety meeting to go over the day's tasks, and the hazards associated with those tasks.

Safety Meetings and Toolbox Talks are conducted by a Supervisor/Foremen on a weekly basis, with attendance being mandatory for all employees on site.

STOP WORK AUTHORITY (SWA)

An employee is to stop work if a hazard has been identified that could put them, co-workers, contracted personnel or the public at imminent risk. This is also true if a hazard could adversely affect the operation, permits or facility.

This work stoppage is best coordinated with the supervisor, however, if there is imminent danger, the employee should stop work immediately.

The employee can use the phrase "I am using my stop work authority to stop this work because..." to clearly communicate the expectation of work stoppage.

All affected workers in the area are to be notified of the work stoppage by the employee stopping the work and have the notification repeated by the supervisor.

The supervisor will make sure that the area is secured, and if necessary, temporary controls put into place (i.e., signage, caution tape, etc.).

All parties will discuss the situation to determine if the SWA was valid.

If it is determined by all parties that the SWA was not valid (i.e., the SWA initiator was not aware of certain facts) then the work shall proceed.

If it is determined that the SWA is valid, then every attempt shall be made to resolve the issue to the satisfaction of all the affected employees.

If there is no agreed upon resolution, the Safety Director shall be consulted.

After a successful resolution, feedback of the hazard control shall be given to all affected employees prior to commencement of work.

INSPECTION

Constant visual inspections are required by the project foreman and superintendent. All job sites will be inspected by the Safety Department.

All equipment (i.e. cranes, heavy machinery, forklifts, rigging, PPE, welding equipment) will be inspected prior to use and continuously throughout the day. Any piece of equipment that is deficient will be marked "Out of Service" until it can be fixed.

PERSONAL PROTECTION

Personal safety equipment is paramount to the S & B safety program. All S & B employees, subcontractors and their employees, and visitors must use personnel safety equipment. All supervisory personnel will be responsible for enforcing the use of protective gear.

1. Approved hard hats must be worn always.
2. Approved flotation work vests must be worn on all marine projects.
3. Safety glasses, or prescription glasses with side shields must be worn always.
4. Ear plugs shall be used as required or anytime there is an exceedance of 85 decibels.
5. High visible vests will be worn always unless directed to do otherwise.
6. Wear Sturdy work shoes, sneakers and sandals are not permitted.
7. When working with power tools or near machinery, do not wear torn or loose clothing, rings, or neck chains.
8. Wear proper gloves when handling rough materials, chemicals, and other materials that may cut, abrade or irritate the skin.
9. All safety gear must be kept clean and cannot be reassigned unless sanitized.

10. Review the Health and Safety Plan for additional PPE requirements.

HOUSEKEEPING

Good housekeeping is the basis for a safe work environment; it prevents incidents and fires and creates a businesslike work place.

Good housekeeping must be kept up daily.

1. Deposit all trash and scrap in the proper container.
2. Keep your immediate work area clean.
3. Store materials properly.
4. Keep clear walkways.
5. Remove or bend nails over.
6. Keep walkways, stairs, and areas around ladders clean.

Inspect site daily to ensure good housekeeping standards are met.

FIRE PREVENTION AND PROTECTION

Fire is a serious problem on any construction site. Ignition sources and fuel are all around.

1. Smoking will not be permitted within any petrochemical facility unless in a designated area by the owner.
2. Housekeeping is vital.
3. Welding and burning require extra care. A 20lb ABC fire extinguisher and fire watch must be available always.
4. Keep combustibles away from heaters.
5. Handle flammable liquids in approved, properly labeled safety cans.
6. Report all fires immediately.
7. Fire extinguishers shall be turned in annually for recharging.
8. Fuel cans will be stored 35' away from ignition sources.

FIRST AID

Approved first aid kits are available on site always.

1. Report all injuries and get first aid immediately.
2. Move an injured person only to prevent further injury.
3. Keep an injured person warm, with feet slightly elevated.
4. Never give liquids to an injured person.
5. Severe bleeding must be stopped immediately. Use direct pressure.
6. Check for breathing. If necessary, give artificial respiration and CPR if certified.
7. Send for professional assistance immediately.

HAND TOOLS

1. Use tools for their intended purpose only.
2. Be sure the tool you are using is in good working condition by inspecting it before usage.
3. Keep the tools edges sharp.
4. Keep tools in their proper storage containers when not in use.
5. Do not leave tools overhead where they may fall.
6. Be sure that all electric hand tools are grounded or double insulated with a ground fault circuit interrupter.
7. Only trained personnel shall operate power tools and equipment.
8. No power tools shall be operated without a proper guard in place.

MANUAL LIFTING

1. When lifting, stand close to the load and bend your knees. Keep your back as straight as possible.
2. Walk, never run when carrying a load.
3. Never twist your body when lifting a load.
4. Never obstruct your vision with the load you are carrying.
5. Get help when the load is too heavy.

LADDERS/STAGING

ALWAYS INSPECT LADDERS

1. Inspect all ladders and scaffold planks before use.
2. Straight ladders should extend at least 3 feet above landing and secured
3. Straight ladders should be set up so that the base is set out from the vertical a distance equal to one-fourth the ladder height.
4. Face the ladder when climbing. Use three points of contact always
5. Never use a metal ladder when using electric tools.
6. Ladders shall not be used in a horizontal position as platforms, runways, or scaffolds.
7. Do not carry materials while climbing a ladder.

HAZARD COMMUNICATION

1. S & B's Global Harmonization System is available to you in the Company Safety Manual containing all the Safety Data sheets. Make yourself familiar with this book.
2. You will receive specific training in the safe handling of hazardous chemicals if you are required to work with them.
3. All chemicals on the job site must be kept in a correctly labeled container.
4. If a new chemical is brought on the job site, report it to your supervisor immediately

WELDING & BURNING

1. Only experienced personnel shall do electric arc or acetylene welding or cutting.
2. Proper eye and face protection must be worn by welders and their helpers at all times.
3. Never cut or weld so that sparks, hot metal, or severed sections fall on cylinders, hoses, legs, feet coworkers, flammable materials or combustible.
4. Never use matches or cigarette lighters to light a torch.
5. Never weld in a closed or confined area unless ventilation is provided.
6. Before doing any hot work, check if a permit is needed.
7. Keep valve protection caps in place when cylinders are not in use.
8. Always transport and store cylinders in an upright position, fastened securely to suitable supports, with valve caps in place.

ELECTRIC

1. Do not use frayed or defective electrical cords. If a cord is defective, put it out of service to be repaired immediately.
2. Assume all electrical wires are hot until an electrician verifies.
3. Only a qualified electrician shall make electric repairs.
4. All electric cords and tools must be grounded or double insulated.
5. Use of Ground Fault Circuit Interrupter is required on all electrical equipment and cords.
6. Obey tag outs.

EQUIPMENT

1. Company vehicles and power equipment are to be operated by authorized personnel only.
2. The operator shall inspect equipment prior to use.
3. Report mechanical problems to your supervisor.
4. All equipment has limits. Observe them.
5. Be Alert. Stay clear of equipment.
6. Do not operate equipment around power lines.
7. Be aware of overhead hazards
8. If obstructions are known to be underground, a spotter is used to navigate during excavations
9. Use a spotter in tight areas
10. Never allow riders on equipment.

CONFINED SPACES

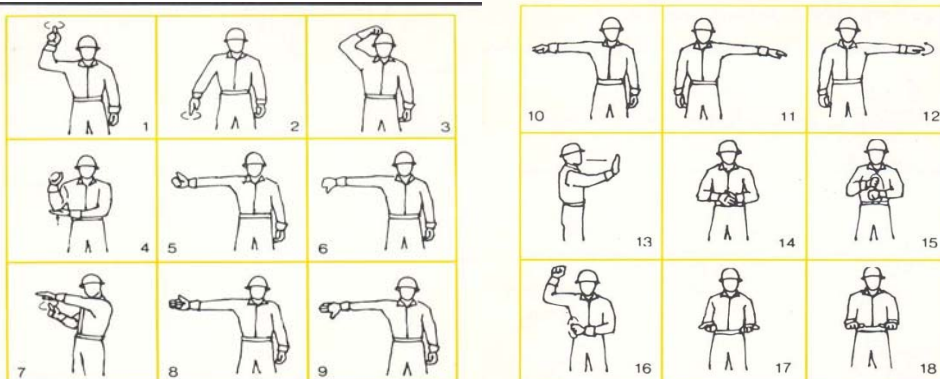
1. Do not enter any confined spaces without proper training.
2. Do not enter a confined space unless the Oxygen is between 19.5% and 23.5%.
3. Do not enter a confined space if the Lower Explosive Limit (LEL) is above 0% LEL.
4. Do not enter a confined space if the Hydrogen Sulfide is above 0 PPM H₂S.
5. Do not enter a confined space if the Carbon Monoxide is above 35 PPM.
6. Do not enter a confined space if there is no mechanical ventilation.
7. Where these conditions occur, S & B personnel shall receive confined space training.

RIGGING

1. Inspect all rigging each day before use.
2. Remove damaged slings, hooks, spreader bars, or other rigging from service immediately.
3. Use tag lines always unless a hazard analysis has determined otherwise.
4. All hooks MUST have a properly functioning safety latch if equipped.
5. All rigging MUST have the permanently affixed and legible identification markings as prescribed by the manufacture that indicates the recommended safe working load.
6. Rigging MUST not be loaded more than the safe working load.

CRANES

1. Keep clear of the counterweight swing.
 2. Stay clear of suspended loads.
 3. Stay clear of the area under the boom, especially when pulling piles.
 4. Stay clear of cables and chains under strain.
 5. Inspect the crane every day before use
 6. A monthly inspection of the crane is required with documentation
 7. Inspect rigging
 8. Use a qualified rigger for all lifts
 9. Use tag lines. unless a hazard analysis has determined otherwise.
 10. Test loads. No shock loading
 11. Keep hands clear of pinch points.
 12. Never ride the load or ball.
 13. Learn and use the correct hand signals. Only one person shall give the operator signals at one time.
 14. Understand the limitations prior to the lift.
1. HOIST: with forearm, vertical, forefinger pointing up, move hand in small horizontal circle
 2. LOWER: With arm extended downward, forefinger pointing down, move hand in small horizontal circle
 3. USE MAIN HOIST: Tap fist on head, then use regular signals
 4. USE WHIP UNE: (Auxiliary Hoist) Tap elbow with one hand, then use regular signals
 5. RAISE BOOM: Arm extended, fingers doped, thumb pointing upward
 6. LOWER BOOM: Arm extended, fingers closed, thumb pointing downward
 7. MOVE SLOWLY: Use one hand to give any motion signal while placing other hand motionless in front of signal (example shown is "hoist" slowly)
 8. RAISE THE BOOM AND LOWER THE LOAD: with one extended thumb pointing up, flex fingers in and out if load movement is desired
 9. LOWER THE BOOM AND RAISE THE LOAD: with arm extended, thumb pointing down, flex fingers in and out if load movement is desired.



10. SWING: arm extended. point with forefinger in direction of swing of boom
11. STOP: arm extended, palm down, hold position rigidly
12. EMERGENCY STOP: arm extended. palm down move hand rapidly right and left
13. TRAVEL: arm extended forward hand open and slightly raised make pushing motion in direction of travel
14. DOG EVERYTHING: clasp hands in front of body
15. TRAVEL (both tracks): use both fists in front of body making a circular motion around each other indicating direction

- of travel (forward or backward). For crawler cranes, only
16. TRAVEL (one track): lock the track on side indicated by raised fist. Travel opposite track in direction indicated by circular motion of other fist rotated vertically in front of body.

For crawler cranes, only:

17. EXTEND BOOM (telescoping booms): both fists in front of body, with thumbs pointing outward
18. RETRAG BOOM (telescoping booms): both fists in front of body with thumbs pointing toward each other.

RESPIRATORY PROTECTION

1. If an employee would like to use a respirator when it is not required by an OSHA standard, they must respectfully follow Appendix D of 1910.134 in the OSHA Construction Handbook.
2. Respiratory protection devices shall be appropriate for the nature and the hazard present in the work area.
3. If directed to use a respirator 29 CFR 1910.134 "Respiratory Protection" will need to be followed.

Excavations

1. If excavation is greater than 4 feet, a means of egress must be installed every 25 feet
2. If excavation is greater than 5 feet, shielding, shoring, sloping, or benching (if soil is level A or B
3. only) must be installed before anyone enters the excavation
4. Spoils must be put back at least 2 feet
5. If a hole watch cannot be present at an open excavation, barricades must be used.

WHILE ON S & B JOB SITES AND COMPANY PROPERTY

1. Employees must be in "working" clothes and ready for work at the designated starting time.
2. Personnel will not quit work before the time designated for conclusion of the work day.
3. Employees must report to work each regularly scheduled work day.
4. No employee will report to work under the influence of alcohol or drugs. Likewise, it is forbidden to carry or use alcohol or drugs on the job site or company property.
5. While on the job site, personnel must comply with OSHA Safety and Health Standards for the Construction Industry and with each of the safety procedures required by the S & B Program on this project.
6. All personal work injuries must be reported to a supervisor immediately.
7. All unsafe conditions must be reported to a supervisor.
8. Employees must wear their personal protective equipment (Non-specialty safety-toe protective footwear, hard hats, safety vests, & safety glasses) as required by S & B always while on the job site.
9. During working hours, the appropriate work clothes shall consist of a shirt, long pants, and steel toed shoes.
10. There will be absolutely no smoking in those areas posted "No Smoking".
11. Good housekeeping by all personnel is mandatory.
12. Employees will not engage in malicious horse play.
13. Fighting on the job site or company property is not permitted
14. Everyone has the right to stop the job.

ACCIDENT RESPONSE

In the event of an injury, the procedure is as follows:

Call for professional assistance 911 Unless there is a site-specific Emergency Contact.

1. Administer first aid.
2. Notify Supervisor
3. Notify safety director.

ANCIDENT REPORT&INVESTIGATION

It is the project superintendent's responsibility to promptly file an incident report with the project owner's representative. The incident report must be completely filled out and given to the safety director. A thorough and complete investigation of all incidents must be conducted as soon as possible. The purpose of the investigation is to prevent the reoccurrence of a similar incident by citing a root cause.

GENERAL SAFETY COMMENTS

Simpson & Brown feels that we have an excellent safety program, administered by sincere supervision. However, nothing can be done without the participation of YOU.

When you are assigned to work with something that you are unfamiliar with, check with your supervisor for the safe way to complete the task. When in doubt, always stop and ask.

Experience has shown that incidents don't "happen". They are caused when employees do not follow safe working practices. Most construction accidents are the result of one of the following:

1. STRUCK BY - Falling or flying objects cause many injuries. Wear your personal protection equipment. Keep out from under or away from equipment, material or operations that may cause this type of injury.
2. FALLS - Falls cause the most serious accidents. Tie off ladders, use hand rails and safety harnesses. Be extra cautious when working at heights. Survey area before work begins to understand where falls could occur.
3. CAUGHT BETWEEN - Being caught or pinched between two objects generally means someone wasn't alert and did not communicate with the rest of the crew. Therefore, we use spotters, circle for safety, and trained operators.
4. Always leave yourself a way out, use good body positioning to limit line of fire hazards
5. STRAINS - These always involve improper pushing, pulling or lifting. Hydration and stretching are also contributing factors.
6. These injury types are pointed out to you because we feel that a word to the wise is sufficient. All four of these types of injuries can be avoided if you use normal care and common sense in doing your job.
7. Lack of preplanning is a big contributor to all injuries; therefore, we have a thorough Health and Safety plan set in place to educate all employees of the hazards that may arise during work.

DRUG & ALCOHOL FREE WORKPLACE POLICY

S & B prohibits the use of alcohol and the unlawful distribution, possession, or use of any controlled substance in the work place,

The use, possession, distribution or sale of controlled substances such as drugs or alcohol, being under the influence of such controlled substances (drugs and alcohol) or testing positive for alcohol or any drug is prohibited while on duty, while on Company premises or work sites or while operating the Company's equipment or vehicles. The employee will be terminated.

All employees are subject to random drug and alcohol testing.

All Employees

As an employee of Simpson & Brown, you will receive a safety orientation. It is intended to provide you with the basic information regarding the Corporate Safety Program and other applicable safety rules and regulations needed to perform work tasks in a safe manner. We recognize that additional safety instructions may be required later in the performance of hazardous and/or unfamiliar tasks.

As an employee, you are required to read this handbook. You are also required to sign the last page and give it to your supervisor. If you are not sure of our safety policy, ask your supervisor. Remember, safety begins with YOU.

EMPLOYEE COMMITMENT

I _____
fully understand the danger of drugs and alcohol
in the workplace. I also understand the danger of
being impaired while at
the job site.

I completely understand the Simpson & Brown
Drug & Alcohol Free Workplace Policy stated in
the Simpson & Brown safety handbook. All
employees are subject to random drug and
alcohol testing.

I acknowledge the receipt of the Simpson &
Brown Health & Safety Pocket Guide and
understand the requirements thereof.

I understand that I am responsible for all the
rules and policies of Simpson & Brown, and any
additional rules that affect my job. I understand
that I am required to follow the guidelines and
instructions contained therein.

Signature

Printed Name

DATE