



**MAYAK SERVICES LIMITED**  
**Gas (LPG) Marketing/Refilling Plants**

**HEALTH, SAFETY AND ENVIRONMENT (HSE) MANUAL**

Prepared By

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| <b>1. COMMITMENT AND LEADERSHIP</b> |                   |                      |

### **1. Mission Statement**

To be a leading indigenous company providing world class gas reticulation services to our clients in the down stream sector of Nigeria's oil and gas industry, through the integration of motivated people, quality equipment and innovative technology.

### **2. Core Services**

- Evacuation of butane and propane gas
- Sales and marketing of butane in gas filling plants
- Construction of reticulated gas systems

### **3. Corporate Statement of HSE Policy**

The policy of Mayak Services Limited is to carry out its operations in such a way that conditions which predispose staff, clients or customers to accidents or injuries are prevented, and where it is not practicable to remove identified hazards, employees, clients or customers who may be exposed to hazards are protected. Hence, we are committed to preventing activities which run contrary to standard operating procedures of the company because of the hazards that may be inherent in our routine operations. Also, adequate attention is be paid to HSE conditions at the workplace and as reasonably

practicable, we ensure the workplace is free from hazards and risks.

In pursuit of the above, the following measures will guide routine operations at Mayak Services Limited:

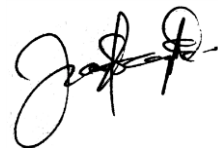
- i. HSE routine will be key for all operations, and that each employee is responsible to know and act in accordance with the company's HSE policy to protect self and others, the environment, and the property of Mayak Services Limited.
- ii. HSE routine shall be conducted alongside all operations of the company.
- iii. We believe that it is each employee's responsibility to visibly conduct themselves in line with the HSE policies of the company.
- iv. No activities shall be carried out, unless safety is guaranteed and there shall be strict compliance to the rules.
- v. We are committed to building a workforce that continually strives to minimize/eliminate the impact of activities on environment.
- vi. The inculcation of the awareness among employees that host communities are considered as stakeholders and as a result, good relationship must be maintained with them.
- vii. Termination of appointment of any employee of Mayak Services Limited or third parties directly or indirectly working with the company under the influence of drugs or substances of abuse, while working within the facility.
- viii. The smoking of cigarette or pipes is prohibited within and around the plant.
- ix. Due to the nature of our operations, coupled with man's imperfection, unsafe acts and conditions abound. It is, therefore, mandatory that periodic HSE audit be carried out to improve safety awareness, thereby producing

Zero LTI's.

- x. The security personnel are authorized to conduct searches, up to personal effects, on all personnel irrespective of position when entering or leaving company premises including work locations.

The Management of **Mayak Services Limited** will ensure strict implementation of this HSE policy, as well as all applicable standards and regulations. The company is committed to:

- a. Eliminating environmental incidents and accident at the workplace
- b. Minimizing waste generation, effluent and emissions
- c. Efficient use of energy and other natural resources.
- d. Ensuring our employees and stakeholders identify HSE improvement opportunities and contribute to HSE performance.
- e. Effective planning and communication of the company operations, HSE programmes and performance to our stakeholders
- f. Encouraging continuous improvements in HSE performance.
- g. Preparedness for emergency response.



**Management**

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|-------------------------------------------|------------|--------------|
| <b>Mayak</b>                              | HSE MANUAL | SECTION<br>2 |
| <b>2. ORGANIZATION AND RESPONSIBILITY</b> |            |              |

## **2.1 Management and Responsibility**

Health, Safety and Environment (HSE) management is a line management responsibility and as such will be given equal consideration and resources as other aspects of the business. Visible management commitment and involvement at all levels is essential for successful HSE performance. Line management has specific minimum responsibilities with regards to HSE management. HSE services and other resources at various levels of the organization will support the efforts of line management. The purpose of this section is to provide an overview of the responsibilities of key positions within Mayak Services with regards to HSE efforts.

All company personnel of Mayak Services have the responsibility of fostering positive, proactive attitudes and behaviour with regard to HSE issues in the company's routine operations. In particular, it is each individual's responsibility to actively perform the following:

## **2.2 All Company Personnel**

- Visibly conduct themselves in line with the core values of Mayak Services.
- Be accountable to for their behaviour and responsible for their own safety.

- Individuals have the obligation to refuse to participate in an unsafe act and have the responsibility to interrupt any operation to prevent an unsafe act or unsafe condition from causing an accident.
- Become familiar with and implement all applicable HSE policies and procedures of the company.
- Immediately report all incidents to a company supervisor.
- Actively participate in the company's HSE plans to improve HSE aspects of the operation, through HSE meetings, safety meetings and emergency drills.
- Actively mentor co-workers to help them improve their HSE performance.

## **2.3 Supervisors**

Within the plant facility, supervisors are expected to carry out the following functions:

- Visibly conduct themselves in line with the core values of Mayak Services.
- Implement HSE policies and procedures of the company.
- Ensure personnel are properly trained and fully understand the various plans related to the company's operations, and their responsibilities within those plans.
- Actively mentor co-workers.
- Take a leading role in the self-auditing process.
- Provide advice and guidance to company personnel as well as serving as a positive role model.
- Conduct and facilitate effective HSE meetings.



## **2.4 Operations Manager**

Within the plant facility, the company operations manager is expected to carry out the following functions:

- Responsible for safe and efficient operation in Mayak Services.
- Ensure that adequate resources are dedicated to effectively support line management and plant installations with regard to HSE issues within the company's operational areas.
- Review and give preliminary approval of company policies, procedures and related documentation applicable to the facility.
- Ensure that all plant installations are operated in accordance with applicable regulatory HSE requirements.
- Assist with investigation of accidents as the need arises.
- Give final approval of plant installations or facility specific policies, procedures and related documentation.
- Assist in marketing products and services that support the company's HSE policies, procedures and philosophies.

## **2.5 HSE Officer**

Within the plant facility, the company HSE officer is expected to carry out the following functions:

- Develop company HSE policies, procedures and related documentation in line with world best practice.
- Periodically review company HSE policies, procedures and related documentation in line with world best practice.
- Distribute company-wide HSE information.

- Coordinate the company-wide implementation of feasible HSE improvement ideas.
- Maintain and disseminate HSE statistical information as required.

## **2.6 Managing Director**

The Managing Director is ultimately responsible for the safe and efficient operation of Mayak Services and the following HSE considerations:

- Give final approval of the necessary resources to maintain and improve the HSE performance of the company's routine operations.
- Establish the strategic direction of the company by issuing corporate guidelines for HSE plans.
- Assure that the value placed on HSE is never comprised, and that safety is always paramount. Service quality, operational performance and personnel motivation at the highest level of the company will always be maintained.

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| <b>Mayak</b>                             | <b>HSE MANUAL</b> | <b>SECTION<br/>3</b> |
| <b>3. HEALTH POLICIES AND PROCEDURES</b> |                   |                      |

### **3.1 Medical Emergency Response Plan**

A Medical Emergency Response Plan will be available at all installations and facilities to ensure effective responses are made to medical emergencies. The procedures for implementing this policy will include:

### **3.2 Emergency Response**

The Operations Manager is responsible to ensure that up to date medical emergency response plans are available, which will include the following information:

- Name and telephone/fax number of the company personnel and client's representative.
- Name, location and telephone/fax number of the company appointed physician.
- Name, location and telephone/fax number of the locally retained medical facility.
- Available transportation resources and logistics (e.g. ambulance).
- Company security (where applicable).

### **3.3 Medical Evacuation**

The following documented information will accompany any person evacuated from an installation or facility on medical grounds:

- Name, date of birth and blood type (if known) mation
- Any known allergies
- The reason for the medical evacuation i.e. type of injury or illness
- Immediate treatment and medication provided including times of administration
- Emergency contact infor

### **3.4 Personal Hygiene**

Mayak Services ensures that all personnel working at any company installation or facility will follow basic standards of personal hygiene. The procedures for implementing this policy on personal hygiene are as follows:

- Dirty work clothes will be laundered on a regular basis.
- All personnel will seek early treatment for superficial skin infections and inflammations, which can be both upsetting and infectious to co-workers.
- All personnel will seek early treatment for transmittable diseases such as colds and flu, to reduce the risk of infecting others.
- Tiolets, showers, wash basins, etc. will only be used as designed.

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| <b>Mayak</b>                             | <b>HSE MANUAL</b> | <b>SECTION<br/>4</b> |
| <b>4. SAFETY POLICIES AND PROCEDURES</b> |                   |                      |

## 4.1 HSE Orientation and Induction

All personnel of Mayak Services will receive an HSE Orientation and Induction for which verification will take place to ensure an acceptable level of understanding, prior to commencing work at the plant facility. The main purpose of the HSE Orientation and Induction of Mayak Services is to ensure critical safety information is given to all personnel and facility specific hazards are understood prior to having access to installations within the facility.

All company personnel will undergo periodic orientation and induction. As a minimum, all personnel of Mayak Services will receive information on the following:

- Routine operations
- Emergency signals and muster stations, station bills including roles and responsibilities
- Emergency preparedness, which must include reference to personnel protective equipment (PPE), escape routes in case of emergencies, and fire fighting equipment
- Periodic HSE meetings and explanation of how and where to receive HSE information (Bulletin Boards, training materials)
- Reporting of incidents - All injuries and incidents to be reported, who to report them to, etc.
- Possession of mobile phones to be reported

- General HSE information including designated no smoking areas, high noise areas, housekeeping, etc.
- Prohibition of drugs, alcohol and weapons
- Environmental awareness

## 4.2 Drugs, Alcohol and Weapons

The drugs, alcohol and weapons policy prohibits the possession or use of drugs, narcotics, alcohol and weapons that are not permitted within the plant facility, and covers all company personnel. Personnel who refuse to participate in, cooperate with, or abide by the rules of this policy will be terminated from employment of with Mayak Services Limited, where allowed by law. The purpose of this policy is to maintain a safe and healthy work place, free of the problems associated with drugs, alcohol and weapons. The company is, therefore, concerned about the effects using illegal drugs and abusing alcohol has on the health and safety of its personnel. At Mayak Services, we recognize that substance abuse leads to increased incidents and medical claims, can lead to the deterioration of a person's health and adversely affect their personal life. We believe that personnel who abuse drugs and alcohol are a danger not only to themselves, but also to their co-workers.

At Mayak Services, substance abuse includes but is not limited to:

- Reporting to work or working while under the influence of or while impaired by alcohol or any other drug.
- Chemical dependence on alcohol or other drugs where job performance or safety of employees is adversely affected.
- The use of illegal drugs. The term *illegal drugs* as used in this policy includes, but is not limited to marijuana, cocaine, heroin, and similar

drugs whose possession and use are prohibited under state or federal law in Nigeria, as well as prescription drugs, unless validly prescribed by employee's physician.

### **4.3 Training**

The company training policy makes it compulsory for personnel to be trained to enable them to perform their job in a safe manner. The purpose of the training policy, therefore, is to ensure all company personnel are adequately trained to perform their duties in the safest manner possible to prevent incidents and injuries.

### **4.4 Engineering, Installation Modification and Projects**

There will be a policy in place to effectively manage and control all modifications, maintenance and repairs in areas of operation of Mayak Services Limited. HSE aspects will be considered and will form an integral part of all stages of design and planning of construction, modification and repairs. The purpose of this policy is to ensure that HSE aspects are addressed in the design and planning stages then effectively managed during construction or modification stages. During the design stage of any modification, new build or upgrade, the long term HSE aspects of the intended project will be considered. As a minimum, this will include but not be limited to the following aspects:

- Escape e.g. emergency escapes, fire fighting systems, etc.
- Elimination of fall hazards
- Incorporating stairways to minimize fixed vertical ladders
- Manual lifting reduction
- Trip hazard reduction

- Ease of maintenance/access to equipment
- Ventilation
- Ergonomic considerations
- Noise control and reduction
- Vibration control and reduction
- Environmental impact
- Personnel comfort

## **4.5 Emergency Response**

To reduce the impact of potential emergencies on human life, to the environment, company property and company reputation, Mayak Services will ensure facility maintains written procedures and conduct drills to ensure effective management of and response to emergencies. The facility will develop and maintain emergency contingency plans and procedures which details specific locations to be taken in the event of an emergency, and will cover the following:

- Fire explosion
- Evacuation and abandonment of facility
- Emergency notification
- Sabotage/criminal acts/riots or war
- Any other location emergency

The objective of the plant facility emergency response procedures is to ensure that in the event of an incident, the plant facility management team is established as soon as possible in order to provide the necessary support required by the emergency location. The plant facility emergency response manual will include procedures to handle emergencies at the facility:

- Personal injury



- Fire
- Environmental incident
- Civil unrest
- Vehicle accident

In addition, the plant facility bill will:

- Detail the first line responsibilities and actions to be performed by all personnel in an emergency situation
- Inform personnel regarding the details of alarm signals, escape routes and muster points
- Be in English language
- Be posted in conspicuous locations throughout the plant facility or office

Mayak Services Limited will maintain a current personnel muster list, updated as often as necessary and readily available at the appropriate muster location

#### **4.5.1 Emergency Alarm Signals**

The General Manager is responsible for defining clearly distinguishable alarm signals to identify various emergency situations if not included on the plant facility bill.

- Alarms will be tested during drills
- All alarm signals will be accompanied by announcements and instructions over the public address (P.A.) system
- The announcements will be made in English language
- The PA announcement will detail whether it is a drill or actual situation and other relevant information such as emergency location, type of emergency, muster point, etc.

### 4.5.2 Emergency Response Drills and Exercises

Personnel will receive training on specific emergency equipment, techniques and procedures through pre-arranged exercises where personnel can demonstrate their ability to apply skills, knowledge and techniques learned during formal training or during exercises, drills and instruction.

### 4.5.3 Emergency Response Equipment

Designated Emergency Response Equipment will only be used for drills and Emergency Response. Misuse of designated equipment will not be tolerated. All Emergency Response Equipment will be regularly inspected and maintained according to manufacturer's recommended practice, expiry dates and regulatory requirements and will be included in the planned maintenance system. The following emergency response categories are the company minimum requirements:

- **Public Address System:** The plant facility will be equipped with a public address system that can be heard and understood throughout the facility. In high noise areas where hearing protection is required, alarm bells or a siren or flashing light will be installed to activate when the general alarm is sounded.
- **Smoke Detectors:** The plant facility will be equipped with smoke detectors.
- **Fire Fighting Equipment:** The plant facility will be equipped fire extinguishers which will be tagged to show date of last inspection. Fire extinguishing appliances will be kept in good order, and will be available for immediate use. The fire extinguishers will be marked with an identification symbol and letter(s) that indicate the class of fires they are suitable for. Fires will be treated depending on their class:

- **Class A Fires:** Occur in common materials such as wood, paper, mattresses, rags, rubbish, etc. The quenching and cooling effect of water or water solutions are recommended.
- **Class B Fires:** Occur in the vapour-air mixture over the surface of flammable liquids such as gasoline, oil, grease, paints and thinners. Class B fires are extinguished by limiting air (oxygen) or by providing combustion-inhibiting agents.
- **Class C Fires:** Occur in or near electrical equipment. Non-conducting extinguishing agents must be used.
- **Class D Fires:** Occur in combustible metals such as magnesium, titanium, zirconium, lithium, and sodium. Specialized techniques, extinguishing agents and equipment must be used to control this type of fire.

#### **4.5.4 Radio Communications**

The plant facility will be equipped with direct communication capability. The geographical co-ordinates and current emergency phone numbers will be posted within the plant facility.

#### **4.6 HSE Information**

The purpose of the HSE Information policy is to ensure that all personnel of Mayak Services Limited are adequately informed on HSE issues, which will assist in improving awareness and HSE performance. This policy will be made readily available and regularly communicated to all personnel of the company. This policy will be implemented as follows:

- HSE information will be distributed in the plant facility and made available to all personnel, and the General Manager will be responsible for providing this information.
- HSE department will provide an Incident Rate Chart including standard statistical information of the plant facility. The injury/occupational illness incident rate chart will provide a statistical comparison of safety performance within the plant facility.
- HSE alerts will be developed and issued to advise all personnel of an immediate danger. These alerts recognize a possible deficiency in our equipment. An alert issued in the plant facility must be acted upon on an urgent basis. Upon receipt, personnel will study the alert and discuss/brainstorm possible causes and steps that might be taken to prevent a similar situation from occurring in the facility.
- The facility will use internationally recognized pictogram type signs to convey HSE critical information such as PPE requirements, hazards, escape routes, emergency equipment, etc.
- HSE advisories consisting of safety posters, HSE improvement campaigns, gallery readers, videos, newsletters etc. will be distributed in the facility on a periodic basis. This information will be displayed/available for review by all personnel.
- The facility will have and maintain an up to date HSE bulletin board that is accessible to personnel.
- Daily communications shall consist of a system in place to ensure critical information in a written form is communicated and understood throughout the working day.

## **4.7 HSE Meetings**

The HSE Meetings policy of Mayak Services covers company personnel and clients working in the plant facility. The purpose of holding effective HSE meetings in Mayak Services is to:

- Recognise proactive HSE performance.
- Provide an opportunity for personnel to discuss, understand and apply company HSE processes and procedures for conducting tasks and identifying hazards and potential risks.
- Increase awareness and motivate personnel by reviewing and learning from incidents and HSE information.

This policy will be implemented using the list below which suggests topics that should be discussed during meetings:

- Conducting periodic HSE meetings in a positive manner to motivate proactive HSE performance among personnel of Mayak Services.
- Individual HSE performance recognition
- HSE alerts and advisories
- Practical demonstration of correct use of tools and equipment
- Hazards identified
- Discuss recent near miss and incidents
- Review Monthly Incident Rate Chart
- Review periodic Injury/Illness Analysis

## **4.8 Travel**

Effective procedures will be in place for the safe transport of personnel between locations and company installations. When in company vehicles, it is the

responsibility of each individual to manage any aspect of their transportation process that is within their control to identify hazards, reduce the risk and unnecessary exposure. This policy covers personnel of Mayak Services, installations and facilities. The policy also covers employees of any client and contractor that work at any installation of Mayak Services. The purpose of this policy is to reduce the risk of injury to any person or other incidents while traveling. The policy will be implemented as follows:

#### **4.8.1 Travel Safety Briefing**

- All personnel should be given a travel safety briefing within 24 hours of travel to and departure from any installation.
- A company personnel designated by the Operations Manager will coordinate the movement of personnel arriving or departing the installation.
- Rules and instructions issued by the vehicle driver will be followed.
- The vehicle manifests will be completed with information such as number of passengers, names of passengers and vehicle registration number.

#### **4.8.2 Company Vehicles**

- Company vehicles are described as those owned by the company or on long term lease (over one month) for use on public roads.
- Company vehicles will only be driven by approved persons holding a valid driving license recognized by the local authority and operated according to local traffic laws.
- Driving company vehicles, like operating any other company equipment, while impaired by any means is prohibited.

- Company vehicles will be inspected and properly maintained in a road worthy condition. Any unsafe condition found during inspection will be rectified as soon as possible.
- Seat belts will be worn by the driver and all passengers in company vehicles.
- Prior to embarking on any trip, company personnel will be encouraged to consider the following:
  - Is the trip necessary right now?
  - Is the length of journey too much all at once?
  - Is the driver suffering from fatigue?
  - Is public transportation a viable option?
  - Is weather a factor?

## **4.9 General Safe Work Practices**

The company's policy on General Safe Work Practices covers all employees and clients within the facility. The purpose of this policy is to prevent injuries, damage to the environment or property using effective safe working practices. All company personnel have the obligation to be responsible for their own safety and be accountable for their own behaviour. Company personnel also have the responsibility to maintain control of the operation by interrupting if someone's safety is jeopardized or if damage to the environment or property is likely. This policy will be implemented using the following procedures:

### **4.9.1 Housekeeping**

Good housekeeping is a sign of well run facility. The plant facility is to be maintained with the highest regard for good housekeeping practices in the areas of cleanliness and appearance as follows:

- A system for designating areas of responsibility for housekeeping will be put in place.

- All work areas at the plant facility will be maintained in a way that provides a safe and organized working environment.
- Floors, steps, stairs and walkways will be kept clean and free from slippery substances, trip hazards or other obstructions to the best extent possible.
- Non slip surfaces will be maintained in good condition and free of oil to the best extent possible.
- Adequate measures to prevent spills and leaks from becoming hazards will be put in place, e.g. drip trays, drain plugs, etc.
- Working tools should be properly stored and not allowed to accumulate around the work area.
- Soiled cleaning materials, scrap and waste will be placed in designated containers for proper disposal.
- Escape routes will be clearly identified and will not be restricted in any way unless alternative plans are in place.
- Access to safety equipment will be clearly identified and will not be restricted in any way unless alternative plans are in place.

#### **4.9.2 Behaviour**

Horseplay is not permitted at the facility of Mayak Services at any time. Some of the basic safe work practices related to stepping and handling practices and how to avoid hazards are as follows:

- Walking not running
- Use hand rails correctly when ascending and descending stairs
- Use proper manual lifting techniques
- Entering and exiting doors carefully
- Do not stand or walk below hoisted loads
- Respect HSE signals and barriers



### **4.9.3 Safe Working Limits**

The manufacturer's stated safe working limit for any piece of equipment or system will not be exceeded. Safe guards or procedures will be present to prevent exceeding these limits. The equipment will be maintained in such a manner to allow operation up to the safe working limit. When in exceptional circumstances equipment can not be maintained in such a manner to allow operation up to the safe working limit, temporary controls will be put in place, such as removing from service or reducing limit levels.

### **4.9.4 Portable Ladders and Steps**

Prior to using portable ladders or steps, company personnel will be trained in their correct use and the procedures to be followed in order to identify and control the hazards associated with their use. Portable ladders and steps may be used for work at a height only under circumstances in which the use of other, safer access equipment is not justified in view of the short duration of use and low level of risk.

## **4.10 Hot Work**

Hot work includes welding and oxygen/acetylene cutting, electrical work, grinding (fixed or portable) and all other types of ignition sources. Fire or explosion in the plant facility and installations will be prevented by putting in place, a Hot Work policy to effectively control any work that may generate an ignition source. A Permit to Work will be issued to control all hot work in any designated hazardous area, or areas in which a gas explosion is likely to occur in normal operations. This policy covers company personnel, installations and

facilities. The policy also covers employees of any client or contractor that works at any company installation or facility. The purpose of the Hot Work policy of Mayak Services is to reduce the risk of a fire or an explosion occurring, and will be implemented using the following procedures:

#### **4.11 Fall Protection**

A Fall Protection policy will be in place in installations and facilities of Mayak Services to adequately protect personnel from the risk of falling. This policy covers company personnel, installations and facilities of Mayak Services, as well as employees of any client and contractor that work at any company installation or facility. This policy will be implemented through various procedures as indicated below:

- All employees will be trained to recognize the hazards of falling and the procedures to be followed in order to minimize the risk of falling.
- Traditional fall protection such as handrails will be utilized in installations and facilities.
- Trained and competent personnel will perform the erection of scaffolding. As a minimum, scaffolding will have such specifications as handrails and ladders for easy access and egress.

#### **4.12 Hazardous Materials**

All hazardous materials at any installation or facility will be identified and labeled to indicate hazards, effectively control, and to heighten the awareness of personnel and thus reduce exposure to harmful effects associated with hazardous materials at any installation or facility. Any material which includes

substances that may have an adverse effect on health or the environment is considered hazardous. This Hazardous Materials policy of Mayak Services will be implemented using the following procedures:

- All personnel will be given awareness training and relevant personnel trained in the handling of hazardous materials.
- A system will be in place that ensures up to date Material Safety Data Sheets (MSDS) are available at the work site for all hazardous materials being used or stored there.
- Hazardous materials will be labeled to indicate the name of the material or trade name, the indication of the danger and associated symbol and will be stored in accordance with the information given on the MSDS.
- The PPE recommended on the MSDS is to be used as a minimum requirement.
- Emergency eyewash stations and emergency showers will be strategically positioned in areas where personnel are likely to be exposed to hazardous materials.
- Proper safety precautions will be followed when working with flammable materials. There will be adequate ventilation in enclosed spaces.
- Personnel will not eat, drink, or touch eyes, nose or mouth after handling hazardous materials without first washing hands with soap and water.
- All cellular telephones will be switched off.
- Installations and facilities will develop and maintain spill control plans.

#### **4.13 HSE Incentives and Recognition**

Mayak Services recognizes that true HSE motivation lies in proactive leadership and a person's continued well being. The company strongly supports the HSE

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efforts of the individuals and teams and believes that proactive HSE performance should be recognized.

#### 4.14 Reporting and Investigation

It is the policy at Mayak Services to report and investigate any Serious Injury Case (SIC), Medical Treatment Case (MTC), First Aid Case (FAC) or occupational Illness. The policy also seeks to report and investigate any Serious Near Hit, Near Hit and any incident involving Environmental Damage or Property Damage. This policy covers employees of Mayak Services and clients, installations, facilities and property. Following the occurrence of an incident on a company installation or facility, a three-phase process will be initiated as follows:

- Action will be taken to ensure the area is safe and medical attention will be provided if required.
- The incident will be reported internally and externally as required.
- The incident will be investigated.

The reporting and investigation at Mayak Services include:

- **Reporting Procedure:** HSE performance at Mayak Services is improved through open and honest reporting.
- **Personal Injury Reporting:** All personal injuries occurring on a company installation or facility (including First Aid Cases) will be reported to the appropriate supervisor and Operations Manager as soon as possible after occurrence. The initial facts will be reported and must contain at least the following facts when reporting a First Aid Case, Medical Treatment Case, Serious Injury Case or Occupational Illness.

- Installation of facility

- Place of occurrence on installation/facility
- Date and time of incident
- Work related or non work related
- Incident ID Number
- Name and position of injured
- Initial diagnosis of injuries sustained
- Treatment given
- Brief factual description of activity at time of incident
- Initial actions taken
- Current situation of injured
- Names of witnesses
- ***Non-Personal Injury Reporting:*** This includes the following:
  - Safe and Unsafe Observations
  - Near Hits
  - Serious Near Hits
- ***Environmental Damage Reporting:*** This includes the following:
  - Major/Serious Environmental Damage
  - Light Environmental Damage
- ***Property Damage Reporting:*** This includes the following:
  - Major/Serious Property Damage
  - Light Property Damage

|                                                 |                   |                      |
|-------------------------------------------------|-------------------|----------------------|
| <b>Mayak</b>                                    | <b>HSE MANUAL</b> | <b>SECTION<br/>5</b> |
| <b>5. ENVIRONMENTAL POLICIES AND PROCEDURES</b> |                   |                      |

### **5.1 Containment and Handling of Hydrocarbons and Chemicals**

At Mayak Services Limited, a policy will be in place which allows all installations and facilities to provide adequate containment for the storage of hydrocarbons and chemicals, and to exercise control measures when transferring the same. The purpose of this policy is to prevent injuries and minimize harm to the environment and property. This policy will be implemented via the following procedures:

- All hydrocarbons and chemicals will be stored in suitable containers.
- A container must always be closed unless contents are being removed or added.
- Containers and the area(s) where they are stored must be inspected periodically for leaks and corrosion or other indications of potential container failure and replaced where necessary.

Installation specific procedures will be developed to address the following transfer operations:

- Loading/backloading from installation to vessel vice versa.
- Bulk fluid transfers within the installation
- Transfer of fluids from drums
- Checking transfer hoses

## 5.2 Drainage and Discharges

There will be a policy in place at all installations and facilities of Mayak Services for purposes of monitoring drainage to prevent contamination by substances harmful to the environment. For this purpose, installation specific procedures will be developed to address the following areas as a minimum:

- Drainage will be visually monitored on a daily basis to ensure that rainwater, wash down does not become contaminated before draining into the environment.
- Drainage from oil storage areas and machinery spaces where significant quantities of oil are present will be contained via an oily water separator, such that oil-containing wastes are not discharged into the environment.

## 5.3 Emissions

At all installations and facilities, a policy will be in place to ensure that equipment will be maintained to prevent excessive emissions. Emissions performance will be considered in selecting new or replacement equipment. The purpose of this policy is to minimize the effect of emissions on the environment. Excessive is defined as any generation of emissions greater than what is expected in accordance with the equipment manufacturer's operating parameters. Equipment includes primarily but is not limited to engines used for power generation, refrigeration systems, and fire fighting systems. Maintenance procedures and schedules will be conducted in accordance with the equipment manufacturer's recommendations, to ensure that expected performance is maintained.

## 5.4 Waste Management

A waste management policy which promotes the use of environment-friendly products where practicable will be in place at all installations and facilities, for purposes of waste minimization, responsible disposal of wastes, and reductions in effects of wastes on the environment. The planning of waste management will be a fundamental part of all operations in the company. The planning stage must classify wastes, identify the type and quantity of wastes present, determine whether they can be eliminated or minimized, detect the presence of harmful substances, (referring to Material Safety Data Sheet (MSDS) when applicable) and ensure correct segregation procedures are implemented and suitable storage is provided.

The installation management will assess the following issues regarding waste management: Collection, storage, processing and disposal with respect to the following types of waste:

- Domestic waste (e.g. plastic containers, paper, etc. normally generated within the installation or facility)
- Maintenance waste (e.g. oily rags, used oil & fuel filters, used oil, scrap metal, wood, paint related products, etc. normally generated while maintaining and operating the installation or facility)