HEALTH, SAFETY AND ENVIRONMENTAL POLICY STATEMENT

FOR

BISHOP GROUP SERVICES LTD

1st JANUARY 2014

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1. GENERAL POLICY STATEMENT

Bishop Group Services Ltd are resolutely committed to providing a safe system of work. This safe system of work shall protect employees, plant and equipment from accidental loss and contribute to the preservation of the environment.

The purpose of this document is to define the Companies policy on Health, Safety and Environmental Protection and to detail the responsibilities assigned to personnel within the organisation.

The effectiveness of the policy requires the dedicated attention and cooperation of all Companies employees and I trust you will join me in a personal commitment to loss prevention as an integral part of our operations.

Cyril W Bishop, Associate I Mech I E Managing Director

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2. STATEMENT OF POLICY

2.1 POLICY

Health, Safety and Environmental Protection are of principal importance to Bishop Group Services Ltd. They shall endeavour to conduct its operations in such a manner as to avoid harm to its employees, subcontractors and all others who may be directly or indirectly affected by its operations. They shall also endeavour to limit the adverse effects on the physical environment in which its operations are performed.

It is the policy not only to comply with Local Authority and Government Laws and Regulations pertaining to occupational health and safety and environmental protection, but to act positively to provide and maintain a safe system of work and wherever possible to work within the constraints of the Guidelines to Good Practice in Pipe-Freezing, Cryogenics Safety Manual and other codes of practice for Underpressure Drilling, Hot Tapping and Shrink-Fitting.

Within the Policy they shall strive to encourage all personnel to develop a keen health, safety and environmental awareness.

2.2 OBJECTIVES

In accordance with the Policy, Bishop Group Services Ltd have set the following objectives:

- (a) To prevent all accidents in the workplace.
- (b) To provide and maintain a safe working environment.
- (c) To develop and implement procedures to establish safe and environmentally sound working practices.
- (d) To comply with all statutory obligations relating to health, safety and environmental protection.
- (e) To provide appropriate training and instruction for all employees to enable them to work safely and to avoid damage to the environment.
- (f) To develop a high degree of safety and environmental awareness amongst all staff and to encourage staff participation in policy development.

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3. RESPONSIBILITIES

3.1 GENERAL

It is incumbent on Management to strive to promote an effective and proper understanding with all employees and contractors on matters that relate to health, safety and the environment. However, all personnel employed by them are required to co-operate with Management on all matters relating to health, safety and the environment and to take reasonable care whilst at work to ensure the health and safety of themselves and others who may be affected by their acts or omissions.

3.2 MANAGEMENT

The Health, Safety and Environmental responsibilities of Management include, but are not limited to:

- a) The development and implementation of procedures to establish safe and environmentally sound working practices that meet statutory obligations.
- b) Ensuring that procedures are established and implemented to provide personnel with the necessary information, instruction and training to enable them to carry out their duties in a safe manner and without detriment to the environment.
- c) Ensuring that all incidents involving injury to personnel, damage to property or the environment and those having the potential for serious effect (near misses) are thoroughly investigated. Having investigated the incident, ensuring that appropriate steps have been initiated to prevent the repetition of similar incidents.
- d) Maintaining regular arrangements for consulting supervisors and employees health, safety and environmental protection matters.
- e) Conducting or, where appropriate, engaging suitably qualified independent consultants to conduct health, safety and environmental audits to identify deficiencies in equipment, operating procedures and policies and identifying and remedying any deficiencies.

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3.3 SUPERVISORY STAFF

The Health, Safety and Environmental responsibilities of supervisory staff include but are not limited to:

- a) Ensuring that work under their control is performed in a safe and environmentally sound manner in accordance with statutory obligations and standards.
- b) Ensuring that personnel under their supervision are fully trained in the skills associated with the work they are required to perform and that they are aware of associated hazards.
- c) Ensuring that tools and equipment used in the preparation and implementation of pipefreezing are well maintained (and, if applicable, certified) and when used correctly, unlikely to cause personal injury or environmental damage.
- d) Ensuring that personnel engaged in the use of pipefreezing equipment are suitably attired with appropriate protective clothing.
- e) Immediately informing Management of unsafe plant or systems of work that cannot be readily resolved.
- f) Identifying areas where improvements can be made to systems of work and recommending their implementation to Management.
- g) Ensuring that all incidents causing injury to the personnel, damage to property or the environment, and those having potential for serious effect (near misses) are reported to Management so that an investigation can be initiated.
- (h) encouraging subordinate personnel to adopt a positive attitude to Health, Safety and Environmental Protection.

3.4 EMPLOYEES

The Health, Safety and Environmental responsibilities of Employees include but are not limited to:

- a) Ensuring that work is performed in a safe and environmentally sound manner, in accordance with statutory obligations and standards.
- b) Taking reasonable care for the health and safety of themselves and others who may be affected by their acts or omissions.

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- - c) Reporting to Supervision any potential health, safety or environmental hazard that comes to their attention whilst performing the work and, where appropriate, discussing with Supervision/Management methods of resolution.
 - d) Promptly reporting to Supervision all incidents causing injury to personnel, damage to property or the environment, and those having potential for serious effect (near misses) and co-operating in any subsequent investigation.
 - e) Co-operating with Management and Supervisors in ensuring the health, safety and environmental responsibilities are fulfilled.

3.5 SUB-CONTRACTORS

Bishop Group Services Ltd does not differentiate between the responsibilities of permanent Company employees and personnel contracted to perform short-term work for them.

In addition to any requirements imposed by the sub-contractor's employer, the sub-contractor shall observe health, safety and environmental responsibilities of employees as detailed in Section 3.4 of this Policy whilst engaged in Bishop Group Services Ltd activities.

4. ARRANGEMENTS FOR IMPLEMENTATION

4.1 INTRODUCTION

The following procedures and systems of work have been developed to augment the Health, Safety and Environmental Policy.

4.2 ACCIDENT/INCIDENT REPORTING

4.2.1 Reporting Requirements

All instances and incidents causing injury to the personnel, damage to property or the environment, and those having potential for serious effect (near misses) must be promptly reported.

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4.2.2 Reporting Responsibilities

The Supervisor of the work group shall immediately notify Bishop Group Services Limited of the incident. Management shall then make the necessary statutory reporting requirements; initiate an investigation into the incident and implement appropriate remedial actions to prevent recurrence.

4.2.3 Accident/Incident Investigation

The purpose of the investigation is to identify underlying causes contributory to the incident. When such causes have been identified, Management shall action appropriate remedial actions to remove/reduce the possibility of recurrence. All personnel are required to co-operate with Management during any investigation.

4.3 TRAINING

All personnel shall have sufficient training and experience to perform their duties safely. This requirement encompasses training in both technical and safety related matters.

Management shall ensure that all project-working personnel are fully trained and knowledgeable in the preparation and utilisation of pipefreezing equipment.

Management shall further ensure that all project personnel are fully trained and knowledgeable in the requirements to establish a safe system of work.

4.4 **JOB BRIEFINGS**

Management shall arrange to ensure that project personnel are thoroughly briefed on each job before commencement of the work. Project personnel shall be made fully conversant with what is required of them, with any precautions that need to be observed.

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4.5 SAFETY MEETINGS

Safety meetings are held at regular intervals. The aims shall be the promotion of safe working practices and the development of safety awareness.

The meeting shall assist in accident investigation, corrective measures and development of procedures.

4.6 POLICY REVIEW

Management shall review performance regarding this Policy on a regular basis and where necessary instigate actions to improve health, safety and environmental protection standards within the Companies.

5. BASIC SAFETY INFORMATION

5.1 SAFE WORKING PRACTICES

- a) Keep floors, stairs and work areas clean. Do not permit grease, mud, water, ice or other substances to remain on floors, stairs and other work areas, causing a slipping or tripping hazard.
- b) Keep working areas clear of superfluous equipment and materials. There is a place for everything and everything should be returned to its place after use.
- c) Inspect all tools and equipment for defects before attempting to use. All defective equipment and tools must be removed from service.
- d) Be familiar with the location and operation of safety equipment about the workplace.
- e) Be familiar with protective equipment required to enable the safe execution of your work.
- f) All lifting equipment must be fully certified and inspected before use.
- g) Ensure working areas are adequately ventilated and illuminated prior to commencing work activities.

5.2 PROTECTIVE CLOTHING

a) Approved safety footwear must be worn at all worksites.

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 - b) Safety helmets must be work at all worksites. Safety helmets must not be painted or defaced in any way, as this weakens the helmet and renders it less effective.
 - c) Approved ear protection must be worn in all high noise areas. Such areas will display notices indicating that requirement for ear protection but, as a guideline, if noise levels do not allow normal conversation, ear protection should be worn.
 - d) Approved eye protection must be worn when handling chemicals, burning, welding, grinding or any other type of work where hazard of eye injury exist.

5.3 PERMIT TO WORK SYSTEMS

Permit to Work systems are likely to be encountered at all locations where pipefreezing operations are performed. The primary objective to Permit to Work System is to ensure that all operations are safely carried out and that the integrity of the site is not compromised.

On receipt of a Permit, the person responsible for carrying out the work shall follow all procedures and precautions as stated on the Permit, taking all practicable steps to ensure the safe execution of the work.

5.4 FIRE PREVENTION

Everyone in industry should be aware that fire is an ever-present hazard to life and property. The following practical steps will help to reduce this risk:

- a) Good housekeeping keep worksites clean and free from waste materials, residues, oil etc.
- b) Smoking is only permitted in designated smoking areas.
- c) Immediately report any oil or gas leaks to a responsible person.
- d) Ensure that all hot work is undertaken within the site Permit to Work system.
- f) Cease any hot work on the sounding of the site alarm.

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5.5 FIRE EXTINGUISHERS

The following portable extinguishers are commonly encountered within the industry:

ТҮРЕ	COLOUR	USES
Dry Powder	Red	Effective on low voltage electrical fires as it is non-corrosive. Dry powder has limited cooling capability and therefore precaution must be taken against possible re-ignition.
		May also be used on flammable liquids.
BCF	Red	BCF is a vaporising liquid, which chemically stops the combustion process.
		Effective on fires involving electricity, flammable liquids, flammable gasses and burning solids.
Water	Red	Suitable for free burning materials such as paper, wood, fabrics.
		NOT FOR USE ON ELECTRICAL OR LIQUID FIRES
C0 ₂	Red	Suitable for all fires.
		Caution required when used in enclosed spaces due to asphyxiating effect.

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6. SAFE OPERATING PROCEDURES

6.1 GENERAL PIPEFREEZING PROCEDURE

The technical procedure of establishing a freeze isolation of a live pressurised pipeline requires the application of cryogenic fluid to the external surfaces of the pipe, thereby reducing the pipe contents to a temperature below its freezing point.

To effect pipe freezing a pipe jacket is solidly bolted and sealed to the external circumference of the pipe. Liquid nitrogen, at a temperature of - 196°C, is introduced into the annular space between the insulated pipefreezing jacket and the external surface of the pipe. The pipe temperature is thereby reduced until it is in the region of the boiling point of liquid nitrogen. Liquid nitrogen is then continuously supplied to the jacket until it is full of liquid. The liquid nitrogen supply rate is then reduced to a level that maintains a sufficient 'boil-off' until the formation of the ice plug is confirmed. The liquid nitrogen supply rate level is then further reduced to a level sufficient to maintain the integrity of the ice plug.

When the ice plug has been established and firmly solidified, instructions shall be given by Bishop Group Services Limited to proceed with the mechanical work.

On completion of the mechanical work, the nitrogen supply is isolated and the plug may then be force-thawed or allowed to thaw naturally to ambient temperature. During this part of the procedure the pipefreezing jacket will be removed and connecting pipes and liquid nitrogen vessels cleared from the freeze position(s).

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6.2 EQUIPMENT DESCRIPTION

6.2.1 Bulk Liquid Nitrogen Storage Vessels

The vessels are mounted and transported in a skid frame.

The principal dimensions of the vessel and transportation skid frame are as follows:

BULK NITROGEN STORAGE VESSELS			
Height	8 ft		
Width	8 ft		
Length	15 ft		
Capacity	7500 litres		
Weight empty	5.5 tonnes		
Full weight	11.2 tonnes		

6.2.2 Portable Liquid Nitrogen Storage Vessels

The vessels are portable, vacuum-insulated cylinders designed to provide a convenient and economical means of transporting, storing and dispensing liquid nitrogen.

The vessels may be of 160 litres or 200 litres in capacity. The principal dimensions of the vessels are as follows:

PORTABLE LIQUID NITROGEN STORAGE VESSELS				
Capacity	160 litres	200 litres		
Diameter	0.510 metres	0.640 metres		
Height	1.470 metres	1.520 metres		
Weight empty	104 Kg	120 Kg		
Weight full	233 Kg	280 Kg		
Maximum pressure	22 psi	22 psi		

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6.2.3 Liquid Nitrogen Transfer Hoses

Liquid nitrogen transfer hoses are used in 1, 2 and 3 metre lengths. The hoses are fitted with $\frac{1}{2}$ " NPT swivel connections and are manufactured to British Standard specification.

6.3 WORKSITE PREPARATION

6.3.1 Liquid Nitrogen Storage Vessels 750 Litre Bulk Storage Vessels

Due to the physical dimensions of the transportation skid, the bulk storage vessel is likely to be placed in an open-air location. However, should the vessel be located in an enclosed area, i.e. not fully exposed to atmosphere, a forced ventilation supply must be provided by suitable air movers and/or fans.

Protection of the steel flooring must be provided to limit the potentially adverse metallurgical effect of allowing liquid nitrogen to come into contact with any steel plating.

Scaffolding boards with a tarpaulin placed under the boards or a similar arrangement to protect steel flooring shall cover the working area in front of the bulk vessel. The arrangement shall ensure that when portable liquid nitrogen storage vessels are refilled from the bulk vessel, accidental spillage will not affect any surrounding steel work.

160/200 Litre Portable Storage Vessels

Suitable air movers and/or fans must ventilate the vessel location.

6.3.2 Liquid Nitrogen Transfer Hoses

The routing of the liquid nitrogen transfer hoses shall be pre-planned to

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achieve the most prudent arrangement.

The transfer hoses shall be insulated from any surrounding steel work by scaffolding boards or similar arrangement, to limit the potentially adverse metallurgical effect of chilling the surrounding steel work.

6.3.3 Permit to Work System

All activities undertaken by Bishop Group Services Limited shall be carried out in accordance with the Client's Permit to Work Procedures.

The following activities are typically carried out under Cold and Hot Work Permits respectively, however personnel must comply with the specific requirements of the Client.

Cold Work Permit

A Cold Work Permit shall allow personnel to fit the pipefreezing jacket, position the storage vessels and decant liquid nitrogen from bulk storage to portable vessels.

Hot Work Permit

A Hot Work Permit is required to start pipefreezing operations due to the temperature monitoring equipment not being classified as intrinsically safe, i.e. it can produce an incentive spark.

6.3.4 Working Areas

The worksite shall be roped off; warning signs displayed and escape routes clearly indicated.

A schedule of personnel authorised to enter the working area shall be agreed with the Client. This shall include personnel names and positions and identify the Supervisor or person in charge of the operation.

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6.3.5 Confined Spaces

Ventilation

All enclosed or partially enclosed spaces shall be fully ventilated before and during any pipefreezing operation. Suitable air movers and/or fans must provide a forced ventilation supply.

Breathing Apparatus

When any application is being carried out in any area that is not a completely open area or freely ventilated, Breathing Apparatus sets may be suitably positioned at worksite. Staff shall be aware of the location of such equipment and familiar in their use.

Oxygen Deficiency Meters

Oxygen deficiency meters capable of providing audible and visual alarm shall be located at the pipefreezing worksite.

6.3.6 Safety Briefing

It is a Company requirement that all personnel working in the immediate area of isolation are made aware that a liquid nitrogen pipefreezing application is to be carried out and that all safety procedures must be observed.

If necessary, Bishop Group Services Limited staff shall provide a preapplication lecture to staff on the safety procedures required when working with low temperature gases.

6.3.7 Provision of Blank Flanges

When isolating a pipeline whereby the line flanges are left intact, for example when changing a defective valve, the pipefreezing Supervisor shall ensure suitable blank flanges are positioned close to the working area. In the event of a problem arising with the nitrogen supply, or if the isolation is required to remain beyond the envisaged work period, the blank flange can

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be promptly fitted to retain the integrity of the line.

6.4 ISOLATION IMPLEMENTATION

6.4.1 Pipeline Flow

Prior to freezing, it is essential to ensure that no flow exists in the pipeline before commencing any pipefreezing application.

6.4.2 Pipeline Contents

At the point of isolation, the pipe must be full of liquid. Any air at the freeze point must be purged from the system. It is the responsibility of the Client to ensure that the system is free of air at the point of freezing.

6.4.3 Pipeline Support

If temporary pipe supports, or any form of additional supports are required the Client shall provide this.

6.4.4 Liquid Nitrogen Flow Control

Liquid nitrogen flow to the pipefreezing jacket shall be under manual control via the liquid nitrogen discharge valve and/or pressure raising circulation vessels.

6.4.5 Verification of isolation

The isolation shall be verified as positive by any or all of the following methods:

Indicative signs Positive test points

Back pressure Pressure development between plugs

Pressure gauges

6.4.6 Monitoring the Isolation

The Supervisor shall ensure that the isolation is continuously monitored and records and logs maintained.

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6.4.7 Exemption from Emergency Drill

Due to the necessity for continuous monitoring, the Supervisor shall request that staff from Bishop Group Services Limited be given exemption from any routine emergency drill during an open pipe situation.

The exemption should be detailed on the Permit to Work.

6.4.8 Isolation Removal

On completion of the mechanical work, the nitrogen supply shall be isolated and the plug may be force thawed or allowed to thaw naturally to ambient temperature. During this part of the procedure, the pipefreezing jacket shall be removed and connecting pipes and liquid nitrogen vessels cleared from the freeze position(s).

6.5 EMERGENCY PROCEDURES

In the event of an emergency, it is imperative that a continuous supply of liquid nitrogen is available to supply the pipefreezing jacket. This is of particular importance if the integrity of the ice plug is the sole means of isolation in an open-ended pipe.

When planning a pipefreezing isolation, the pipefreezing Engineer shall estimate the liquid nitrogen usage required to implement and maintain the isolation. The volume of liquid nitrogen available in the storage vessel(s) shall be between 25%-100% in excess of the estimated volume required, depending on the complexity of the isolation. The reserve liquid nitrogen capacity is therefore available to maintain the isolation integrity beyond the envisaged time-span, for example in the event of an emergency. The excess liquid nitrogen capacity may be supplied from an additional 200/160 litre portable storage vessel(s) or by ensuring an excess volume is available from the bulk storage tank.

The following procedure shall be adopted when implementing isolations on large diameter pipelines when using portable 200/160 litre nitrogen storage

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vessels.

A ½" NPT tee-piece complete with ½" isolation valves shall be fitted to the inlet of the pipefreezing jacket. A separate 200/160-litre nitrogen storage vessel shall be connected via the valves to the tee-piece.

In normal operation, nitrogen shall be supplied from one vessel through the tee-piece to the pipefreezing jacket. On the other side of the tee-piece the second 200/160-litre capacity nitrogen storage vessel shall be dedicated to emergency use. In the event of an alarm/emergency, the regular supply line valve shall be closed and the valve on the dedicated supply opened to a trickle flow to ensure that the pipefreezing jacket(s) is/are continuously full thereby ensuring the integrity of the ice plug.

When pipefreezing large diameter pipelines (in excess of 12"), a direct feed from the 7500 litre bulk vessel supplies the pipefreezing jacket. In such isolations the pipefreezing Engineer shall ensure that sufficient reserve volume of liquid nitrogen remains within the storage vessel to allow the isolation to be maintained in the event of an emergency.

7. OPERATIONAL SAFETY STANDARDS

7.1 INTRODUCTION

Pipefreezing is a safe and practical way of achieving positive isolation of liquid carrying pipelines. Bishop Group Services Limited is committed to ensuring that pipefreezing operations undertaken by their staff are as safe as reasonably practicable.

To help achieve this objective these Operational Safety Standards have been devised. They cover essential aspects of pipefreezing operations and should be read in conjunction with the Bishop Group Services Limited Safe Operating Procedures.

All staff must be made aware of these standards and managerial and

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supervisory staff must ensure that they are complied with at all times. Any failure to comply with these standards may result in disciplinary action.

7.2 PERSONNEL

7.2.1 Recruitment

Bishop Group Services Limited personnel employ only people with the physical capabilities, basic technical skills and responsible attitudes necessary for safe working in pipefreezing operations.

7.2.2 Training

Before any person begins work on an operational site, they shall:

- 1) Undergo such technical/orientation training as is necessary to enable them to operate pipefreezing equipment in a safe and efficient manner. This training may be given by the equipment manufacturer or supplier, or by Bishop Shrink Fitting Limited supervisory staff. An integral part of this training will be familiarisation with Bishop Group Services Limited Safety Policy, Safe Operating Procedures and Operational Safety Standards. As a minimum this training will include:
 - a) Bulk Liquid Nitrogen Vessel Design/operational features plus safety systems inspection/certification requirements.
 - b) Portable Liquid Nitrogen Vessel As above plus maintenance and operational handling requirements.
 - c) Liquid Nitrogen Transfer Hoses Inspection, use and maintenance requirements.
 - d) Instrumentation Monitoring/interpreting instrumentation.
 - e) The principles and importance of Permit to Work Systems.
- 2) Undertake any necessary induction/orientation training specific to the Client's operational site.

7.2.3 Update Training

When any changes are made to equipment or Safe Operating Procedures,

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which may have implication for safe operations, all operational staff will be made aware of the detail and implications of such changes.

This training may be given by the equipment manufacturer/supplier, or by Bishop Group Services Limited supervisory staff.

7.2.4 Job Briefings

Prior to starting any pipefreezing job, the supervisor in charge must undertake a pre-job briefing. The scope of the briefing will be at the supervisor's discretion. Emergency procedures/actions and any special problem areas anticipated.

During the briefing the work crew are encouraged to ask questions to clarify their understanding of what is required.

7.2.5 Safety Meetings

A member of Bishop Group Services Limited staff will play a full representative role at any client safety meeting, if invited.

He/she will co-operate fully with all others in monitoring/improving safety standards.

7.3 SAFE WORKING METHODS

7.3.1 Client/Site Requirements

Bishop Group Services Limited staff will at all times comply with the client or site safety requirements.

7.3.2 Safe Operating Procedures

Bishop Group Services Limited staff will at all times comply with the requirements of Bishop Group Services Limited Safe Operating Procedures. If any requirement cannot be met, work must cease and the circumstances be reported to the Supervisor immediately.

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7.3.3 Hazard Reporting

If any member of a work crew is in any way unhappy with the safety of an operation, he/she must immediately bring his/her concerns to the attention of his/her Supervisor, who will assess what needs to be done to make the situation safe - and will if necessary immediately suspend work.

7.3.4 Accident/Incident Reporting

Bishop Group Services Limited staff must co-operate in and comply with the Client's accident/incident reporting procedure. Any event, which leads to, or may have lead to injury, damage to property or the environment, must be reported to the Bishop Group Services Limited Supervisor, who will compile a full written investigative report for the Bishop Group Services Limited management.

7.4 SAFE EQUIPMENT MATERIALS

7.4.1 Inspection and Certification

In order to ensure safe efficient working, all pipefreezing equipment must be inspected and function tested (as appropriate) before it is shipped to, and on receipt at, all Clients' sites. All relevant certification must also be checked to ensure it has availability, validity. Originals or copies must be made available to the client's representative if required.

Any hazardous materials in use must be accompanied by the supplier's hazard information sheet. Any protective clothing or measures prescribed therein must be in place before work begins.

7.4.2 Maintenance

All pipefreezing equipment must be maintained in a safe and efficient working order. Site maintenance work will normally be of minor notice, for example cleaning, minor adjustment and lubrication. If more involved work is required the Bishop Group Services Limited supervisor must contact Bishop Group Services Limited management.

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7.4.3 Housekeeping

All operations must be conducted in a clean and orderly manner. Equipment surplus to requirement should be stored away neatly and equipment/material arrangements should be laid out/stored in a non-hazardous way. Safe access and egress to the worksite must be maintained at all times.

8. GENERAL PROCEDURES

As a standard policy, Bishop Group Services Limited will produce a written Method Statement, Risk Assessment, Procedure, and Responsibility Statement for all Pipefreezing, Hot Tapping, and Underpressure Drilling, Shrink-fitting and Purging applications.

The above Policy is applicable to all activities undertaken by Bishop Group Services Limited.

Signed	Date
Print Name	Position

For and on behalf of Bishop Group Services Limited

1st January 2014

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