Manual Section 7	Issue Date 12/09/10	Revision Date 01/15/26	Policy Number LLCP-112
	Safe Work Authorization Process		

Purpose
This program is designed to ensure that work is planned and executed to protect people, assets and the environment. When fully implemented, this standard and the related procedures and/or forms will provide guidance for Company employees to engage in safe work activities. This document establishes an outline of how to utilize Company forms and/or documents that will ensure that business is conducted according to our beliefs. It will also ensure compliance with customer and/or governmental regulations.

Scope
All GIS Holdings, LLC Companies and affiliates including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, LLC., GWIS, Mack Steel, NuWave, Valvemax, Discovery Industries, Inc., Global Inspections, LLC, and EIS, hereafter identified as "Company".

Policy
It is Company policy to conduct business in a safest and most environmentally friendly manner. The established outline that is executed in this document shall be used on all tasks.

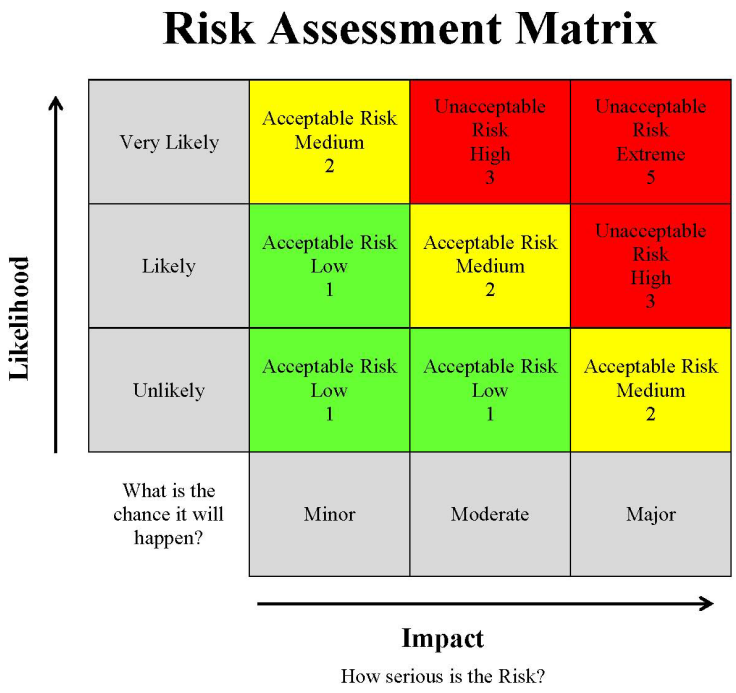
Procedure
The Company has established this procedure to remain in compliance and conduct business safely in our industry. The following outline establishes the safest and most effective way to remain in compliance:

- Safe Work Authorization Plan (SWAP)
    - Safe Work Permit (Provided By Customer As Needed)
    - Risk Assessment Matrix (RAM) (Provided By Customer As Needed)
    - HAZID
    - Minimum Requirements
    - JSEA
    - Observation Process
    - Risk Assessment
    - Confined Space Entry Permit
    - Hot Work Permit
    - Critical Lift Plan
    - Management of Change

Elements of Safe Work Authorization Process (SWAP)

Safe Work Permit
Prior to the beginning of any work, a Safe Work Permit shall be issued by the customer if they participate in such programs. This permit shall be attached to the Company JSEA that will also be completed prior to the start-up of a task.

Risk Assessment Matrix (RAM)
RAMs shall be performed when the customer dictates so or when there is significant task or SIMOPs taking place. This matrix will assist employees in how they focus their attention on the task that is performed and/or tasks or other elements that may affect their operations.



HAZID
This process has been developed to assist in preventing incidents. Workers must recognize and effectively identify the hazards associated with the tasks they perform. By focusing on the principles of hazard recognition which is installed into our HAZID Wheel, employees will be able to identify hazards more effectively.

Minimum Requirements
Minimum Requirements are a specified series of actions or operations which have to be executed in the same manner in order to always obtain the same result under the same circumstances Less precisely speaking, this word can indicate a *sequence* of tasks, steps, decisions, calculations and processes, that when undertaken in the sequence laid down produces the described result, product or outcome.

The Minimum Requirement process is that is divided by two parts. The first part is labeled as "Memory Joggers" and shall be utilize as a reference tool that advises potential hazards that may exist during the task that will be performed. These hazards shall be eliminated or captured on the JSEA along with the processes used to protect workers from them. The second part of the Minimum Requirements is considered the "Minimum Requirements" which are a series of steps that are in chronological order that should follow in order to perform the task safely.

JSEA
Job Safety Environmental Analysis, commonly known as JSEA, is a process used to determine hazards of safe procedures for each step of a job or the recognition, evaluation and control of hazards by all involved in the task.

A specific job or work assignment can be separated into a series of relatively simple steps; the hazards associated with each step can be identified; and solutions can be developed to control each hazard. The most effective JSEA are those that involve ALL employees. Everyone should have a written JSEA of job task including third party, client personnel, etc.

Observation Process
Observation Process is a Behavior-based Safety (BBS) process which depends on site observations. These observations include individual feedback, which is the most effective act in the BBS process.

The observer monitors the worker and notices his safe as well as at-risk behaviors the worker is putting himself into. Once an observation is complete or if the observer notices something that is at-risk, the observer stops the job and starts his feedback by commending the safe behavior of the worker or he explains the at-risk behaviors the worker was doing. If the worker was at-risk, the observer asks the worker why he was putting himself at risk and discusses with the at-risk employee of ways that he could have done things differently to avoid such risk.

Risk Assessment
A risk assessment is the systematic identification and controlling of potential hazards in the work place. This process is the overall hazard identification process and should be completed on a bi-weekly basis.

Confined Space Entry Permit
Entering a Confined Space is always considered a dangerous working condition and prior to entering a confined space a Confined Space Entry Permit shall be completed to ensure that steps are taken for the safety of personnel that will completing tasks inside as well work that may be taking place near-by the confined space.

Hot Work Permit
On certain hot work tasks a permit shall be filled out to protect people, the environment and equipment that surround such work. (See Hot Work Policy) Prior to performing any hot work, one shall take proper precautions outlined by the permit to ensure safety.

Critical Lift Plan
When a lift is to be made that consist of personnel and/or if the Crane's capacity meets or exceeds 50% of its capacity a Critical Lift Plan shall be completed to ensure safety of the equipment and surrounding personnel.

Management of Change (MOC)

A Management of Change is change in a process, procedure, equipment, control system, technology, etc. that requires documentation to be submitted to upper management for approval. If approval is granted for the change, the change is not a replacement in kind but a temporary diversion from our normal circumstance and shall be return to Company Standard Operating Procedures.

SWAP PROCESS