

SAFETY

BASIC SAFETY POLICY

Todd Management is responsible for the prevention of accidents and the Company will ensure that all approved safety standards and safe working methods are strictly enforced at all times. This responsibility and authority is passed on to all levels of supervision. Each craftsman and all support personnel are charged with the Company's responsibility to maintain rigid adherence to safety standards.

All rules and regulations under the Federal Occupational Safety and Health Act (OSHA) and the Washington State Industrial Safety and Health Act (WISHA) must be complied with by employees of all levels. Both management and labor bear the responsibility for compliance. For clarification or interpretation of the regulations, contact the Safety Department.

Safety Department

The Director of Environmental/Occupational Safety and Health is charged with administering the Todd Safety Program to ensure that all safety objectives are met. Overall enforcement of safety policy is the responsibility of the Director of Production. The Department Supervisors and Ship Superintendents shall ensure that safe conditions and work methods are being practiced.

The final interpretation of State or Federal Safety Standards is the responsibility of the Safety Department. In situations of emergency or of a temporary nature or otherwise not covered by the present regulations, the Safety Department is to be informed prior to the start of the job so that the new rules can be formulated to cover the operation. Before new equipment or work methods are put into operation, the Safety Department is to be notified so that it can make sure that the equipment or work methods comply with existing State or Federal codes.

General Safety Regulations

The following Safety Regulations are general and apply primarily to production operations. It is expected that employees will be familiar with these rules and comply with them to the best of their ability. Violation of these rules can result in disciplinary action.

- Work areas are to be maintained in a neat and orderly condition.
- Scrap material, such as rags, bolts, dogs and wedges are not to be allowed to accumulate on the floor (deck).
- Spills of oil, grease, paint and other slippery substances are to be cleaned up immediately.
- Aisles and walkways are to be kept clear of tripping hazards at all times. Leads and hoses are to be elevated or bundled on the deck and kept to the side.
- All personal protective equipment required for a procedure or production area must be properly fitted and worn.
- Hot work procedures must be followed at all times. Find Hot Work Procedure under "Safety Procedures, Section A".

- Maintain a free access to all safety equipment including fire fighting equipment, stretchers, electrical panels and boxes, etc.
- Scaffolding, planking, ladders; etc. must be erected by the Carpenter Shop. Ladders are to be secured.
- Proper barricades, safety rings and safety wires are to be used for openings, hatches, manholes, etc. Barricades must be properly lighted for visibility.
- Operating equipment, tools or machinery without proper guards and/or signaling devices is prohibited, as is the unauthorized removal of guards and signals.
- Follow all directions on the Marine Chemist's Certificate and other precautions stated by the Safety Department through signs or directions to supervision. Obey all procedures for working in confined spaces.
- Do not smoke, weld or use open flames in areas posted as "NO SMOKING". Observe all warning signs in the yard.
- Comply with all Fire Prevention procedures.
- Before leaving the job, always check the area to be sure that there are no sparks or smoldering materials.
- Observe all safety practices that pertain to your craft.

Safety Procedures

Hot Work - No hot work will be permitted unless authorized by supervision and in accordance with the Marine Chemist's or Shipyard Competent Person's Certificate.

It is the responsibility of both the lead craft and the welder, burner or fitter to determine the hazards involved and the possibility of fire before any hot work is performed. This involves checking for grease, oil, solvents, rags or other flammable, and making certain both sides of decks and bulkheads are hazard free.

It is the responsibility of both the lead craft and the welder, burner or fitter to take necessary precautions in protecting machinery, electrical equipment, furniture, fixtures, etc. from hot sparks and fire.

No hot work is to be performed in the vicinity of spray painting or on surfaces coated with wet paint or preservatives.

No burning or welding is to be done on or near lines, tanks or compartments that have contained volatile gas or liquids until a chemist's certificate has been issued that it is **SAFE FOR WORKERS** and **SAFE FOR HOT WORK**.

Drop testing procedures are posted on all gas manifolds and must be performed prior to burning or brazing.

Avoid standing under pieces which may drop while burning. Be sure others are in the clear. Refer to PM 12.1.34 for requirements to lower steel plate on the Dry-docks.

Do not burn or weld without using proper respirators and ventilation.

Remove torch and hose from confined space during absence of operator.

At lunchtime, the gas and oxygen to burning and silbrazing torches shall be turned off at the tank or manifold. At the end of shift, the gas and oxygen shall be disconnected at the tank or manifold, the torch removed and leads pulled back and coiled down in the open air. There is no exception to this rule.

Burners and Gas Welders must wear proper protective equipment such as goggles, etc. Do not wear ragged and oily clothes or gloves, etc. or short sleeves and never wear low shoes while burning or welding. Never use oxygen from your torch to clean work surfaces or your clothes. Oxygen makes all materials highly flammable.

Hot Work - Welding - Never begin welding without first checking the other side of the surface to be welded. Be sure you completely understand all the items covering hot work procedures set forth in PM 7.5-20.

Electric welders must wear proper personal protective equipment at all times. Be sure that your machine is properly guarded and grounded.

Welders must set and use flash shields when working in the shops, on the slabs or in other locations in the Yard where other persons are working nearby or are likely to walk by. When there are several welders working near each other, such as on side shell or bottom jobs, they are to install shields between them in order to avoid flashes when they lift their hoods to clean their welds. Always disconnect your whip before pulling your lead. When welding on galvanized or painted metal, proper respiratory protection must be worn. Verify that adequate ventilation exhaust suckers are in use.

Marine Chemist/Shipyard Competent Person - Confined Spaces - When assigned to work on any vessel, do not enter any confined spaces such as tanks, voids or cofferdams until they have been checked by a Chemist or Competent Person and a certificate "SAFE FOR WORKERS" has been issued and posted. No Hot Work shall be performed until the area is certified "SAFE FOR HOT WORK".

All qualifications and instructions found on the certificate shall be followed by craft supervision and journeymen. These qualifications may include use of personal protective equipment, specified fire protection measures, and ventilation requirements. If the instructions are not understood, please contact the Safety Department.

Do not enter closed spaces such as cofferdams, tanks, voids and double bottoms without checking with your supervisor first.

Before entering a confined space, make sure adequate ventilation is supplied and maintained.

REPORT FIRE IMMEDIATELY

Fire Extinguishers

Know the location of the nearest fire extinguisher. If there is any doubt that you can't control the fire with an extinguisher, call Ext. 292 immediately.

There are five different types of fire extinguishers in the yard. Know what type of extinguisher to use on each class of fire.

When using a fire extinguisher, direct the stream at the base of the fire. Remember, you have a very limited amount of extinguishing agent. Use it effectively, don't waste it.

CO2 gas is asphyxiating. Do not use in tanks or confined spaces. Do not enter a tank or confined space where CO2 extinguishers have been used until ventilated or tested safe to enter.

Fire fighting equipment must not be used for any other purpose.

All fire fighting equipment shall be kept unobstructed at all times.

Gasoline and other flammable liquids must be handled in approved safety containers only. The contents of the container must be labeled for easy identification.

Use only approved solvents for cleaning purposes and be sure that they are in an approved container.

Do not fill the tanks of engines while they are running and always have the proper type of fire extinguisher at hand when refueling.

If any unusual odor or gas is noticed on or about the ship, report it at once to the nearest Supervisor. It may be toxic or explosive.

Reporting Accidents and Fires

It is very important for your own protection that you observe the following procedures for reporting an injury.

- Report the personal injury to your Supervisor. S/He will record the details on a Todd Dispensary Dispatch Slip.
- Any visit to the Yard First Aid Dispensary that is not an emergency will require a Dispensary Dispatch Slip signed by your Supervisor. This procedure is necessary to ensure proper medical and insurance coverage and to make your Supervisor aware of your absence so that adequate coverage for all workstations is maintained.
- No injury is too small to report. Though the injury may seem minor in nature, complications could develop.
- **DO NOT LEAVE THE WORKING PREMISES AT THE END OF YOUR SHIFT WITHOUT REPORTING ANY INJURY WHICH YOU MAY HAVE RECEIVED THAT DAY.** You may be deprived of your right to compensation if you do not report your injury promptly.

Department Supervisors are responsible for conducting accident investigations and reporting to the Safety Department. The Safety Department will review all investigations and assist in the investigation when requested or needed.

In the event of a fire:

- Alert Authorities -

By Telephone: Call 292 and report the exact location of the fire and the nature of the material involved, together with any other information which might be helpful to responding fire fighters.

In Person: Report directly to a qualified Fire Marshal or to the Safety Office or Main Gate.

ANY PERSON REPORTING A FIRE IS REQUESTED TO STAND BY AND DIRECT RESPONDING APPARATUS AND FIREMEN TO THE SCENE OF THE FIRE.

- When a fire presents a possible danger to you or others, calmly advise people to leave.
- When there is severe smoke present, crawl to the nearest fresh air opening.
- If time permits, close doors and windows to confine the fire and prevent drafts. Do not endanger yourself or others in this effort. Use proper equipment at hand to extinguish the fire, pending arrival of the Fire Department.
- In any disaster, take time to calm yourself and think clearly. When reporting an emergency situation, make certain you remain controlled and report the facts clearly. Also check to make certain the person you are reporting to understands what has been said.

Safe Practices

Housekeeping - Good housekeeping practices are essential to the safety program and to the work environment. Regulations are strictly enforced.

All leads, hoses, scrap materials, excess materials for the job, debris, etc. must be kept in a safe place at all times. The passageways and walkways aboard the ships and the aisles, benches, machines, etc. in the shops are to be kept picked up as the job progresses.

All hoses, electrical cable and ventilation tubing is to be elevated up and off the deck. There is an ample supply of cable trees and hooks available at various locations in the yard. The craftsmen using the leads, such as burners and welders with their hoses; the electricians with their power and temporary light leads; pipefitters and laborers with their water, steam and air leads; all are to obtain whatever cable trees and hooks they need, have them transported to the ship and installed. In the ships, planning provides permanent overhead support for most operations but hooks and trees are available for temporary supports. Do not hang hooks on cable runs, use the mounting brackets.

Keep all tools and materials out of aisles and passages. Return tools to their proper storage areas after use. Stack materials out of the way.

Immediately clean up any oil, grease, water or other slippery substances that are spilled on the floor.

Dispose of empty paint cans, oily rags, etc. promptly. They can cause fires.

Staging - The installation of staging, ladders and handrails is the responsibility of the Carpenter Department. Employees of other crafts are not to move or alter staging in any way. If the work requires the altering or moving of the staging, notify the Supervisor of

the Carpenter Shop and he will have the necessary changes made. Do not improvise a staging; only authorized, constructed staging is acceptable. Violators will be discharged. Check scaffolding for safe planking and handrails.

Never use a defective ladder. In order to prevent a ladder from slipping, always tie the ladder securely or have a co-worker hold it for you.

Do not use unsafe ladders. Tie off ladders and use both hands when climbing.

If you place a ladder in front of a door opening or in the way of moving equipment, you must take precautions to protect it from being struck. Always face the ladder and use both hands when climbing or descending.

Employees shall not use kegs, buckets, spools or any other makeshift devices as a work platform or for access for higher elevation. They shall use ladders, benches or approved scaffolds.

Guarding - Whenever you open a manhole, pit or other opening in the ground, deck or floor, always guard it so that no one will fall into it. Replace the cover as soon as all the workers are out and the job is completed.

Look out for unguarded deck openings. Safety railings or covers shall be provided in all such locations.

All openings and their safety rings, guards, or barricades must be adequately guarded.

Temporary Light - Adequate lighting in dark areas is a must.

If you are working in an area that requires more general lighting than has been provided, contact Temporary Light for additional lights.

Never remove the general illumination lights or those placed as warnings over openings.

Do not attempt to hook up your own electrical equipment (welding machines, blowers, etc.) Contact Temporary Light to make the hook-up.

Do not attempt to make your own electrical repairs. Contact Temporary Light to make them.

Temporary Ventilation - If you are working under conditions that requires blowers or exhaust fans, notify your Supervisor or Temporary Ventilation.

Do not throw rags, paper, sand, water or other objects into the blowers or exhaust fans.

Never replace or remove any ventilation equipment unless authorized by your Supervisor.

Tools and Equipment - No employee is to attempt to operate, test or repair any machinery, electrical apparatus or other equipment or to turn on any electricity, gas, steam, air, acids, etc., unless expressly authorized to do so and then only after s/he has made certain that no one is in a position to be injured by such action. Do not under any circumstance use tools or equipment that have been red tagged as UNSAFE until those items have been repaired and the tag removed. Always use the proper tool for the job. Whenever tools become dull, weakened, broken, mushroomed or otherwise unsafe, return them to the Tool Room at once. Machine guards, safety railings and other safety devices are placed in position for your protection. They must not be removed except for servicing or repairing and then only by authorized persons. These safety devices must be replaced before work is resumed.

All hand tools shall be kept in good repair and used only for the purpose for which they were designed.

Do not use defective tools of any kind.

Safety guards are provided on hand-operated mechanical equipment. Most hand injuries occur because of careless acts when operating equipment or handling material.

When required, wear gloves suitable for your work. Use guards that are installed for your protection. Do not remove a safety guard.

Be cautious in landing loads - see that your hands are clear.

Use only extension cords that are in good repair and have the proper type lamp guard in place.

Approved explosion proof lights are the only type that may be used in areas where there is a possibility of an explosive atmosphere developing.

Never remove or change tools until the air has been shut off at the valve. Do not, under any circumstances, shut off the air by crimping the hose. You must always use the valve.

When putting an air gun down be sure that it is not pointing toward anyone. If the trigger were accidentally tripped the tool or plunger could fly out and cause an injury. Always remove the tool when the gun is not in use.

Material Handling - Size up a load before you lift it, lift properly and get help when it is needed.

Lift with your legs - not with your back; get help if necessary. Don't lift off-balance or twist when lifting.

Use a hoist, forklift, crane or other mechanical means where loads are too heavy to handle by hand.

Watch out for others when going through doorways, around blind corners, etc. Never carry heavy, bulky or otherwise awkward objects up or down ladders; use a hand billy or other hoisting gear.

Never walk or stand under suspended loads or pass between swinging loads and fixed objects. Listen for warning signals.

Employees shall stay well in the clear of loads being moved or handled by any conveyance. They shall be sure to keep their hands and body clear of moving parts or machinery or equipment.

In carrying loads with other workers, always give adequate warning of any action on your part such as dropping your end of the load. Keep in step; it makes the load easier to handle.

Operators are not to lift or move loads without receiving the standard accepted signals from the person designated to give them. These signals are to be given by one designated person only. The operator is not to make a lift, regardless of signals, if he believes that some person is in a position to be injured. Check your Safe Practices Handbook for Handling Weights and Weight Lifting Equipment.

Be sure slings and chokers are safe. Do not overload; stay out from under loads.

Always secure loads to pallet boards before lifting.

Clothing - We encourage all employees to wear clothing suitable to their job and job environment. If your job is in the production areas, be sure to wear the proper safety attire.

Garments which cover the shoulders must be worn at all times. Persons exposed to welding, burning or similar operations shall wear shirts with long sleeves. Ragged sleeves, loose ties and other parts of clothing which might be caught in moving tools and machinery must not be worn. Bermuda shorts or other types of short trousers or pants exposing the legs shall not be worn in work areas.

Long hair must be either confined by cap, snood, hair net, pinned up or tied off and bunched beneath the hard hat to prevent it from being caught in power tools or moving machinery.

When you are working under any of the above conditions and you have long hair, it must be worn so that it is under your hard hat. Removal of the headband from your hard hat is not permitted.

Shoes - Substantial and appropriate footwear shall be worn at all times in production areas. Sneakers, houseslippers, canvas-top, open-toed, sandals and similar footwear do not meet appropriate footwear requirements of these standards. Safety shoes are recommended footwear for production areas.

Commercial shoe-mobiles visit Todd to sell shoes on a periodic basis. A large assortment of safety type work shoes, boots, and dress shoes are available.

Personal Protective Equipment - All protective equipment must be issued by the Company or approved by the Safety Department. Protective equipment is most effective and reliable when it is well maintained and kept clean. Soiled or damaged equipment should be returned to the Tool Room and exchanged.

Hard Hats - Craft and Administrative Department employees are required to wear an approved type of safety hard hat in all production work areas. Todd furnishes hard hats in designated department colors. Personally owned hard hats are not authorized. Hard hats which have been modified by trimming, drilling holes, bending, etc. are also prohibited.

Eye Protection - Approved protective eyewear must be worn by all employees in all production areas, including piers, ships, shops, dry-docks, storage areas and onboard all vessels being worked. Safety glasses alone are not acceptable in performing hazardous operations requiring goggles or face shields, such as for grinding, chipping, pouring or handling of molten metals, acids or caustics, sandblasting, etc. Your supervisor can advise you of the proper eye protection to be worn on specific jobs. Only protective eyewear which complies with the current edition of ANSI standards may be worn in areas where protective eyewear is required.

Protection Against Radiant Energy - In any operation in which the eye hazard of injurious light rays or other radiant energy exists, depending upon the intensity of the radiation to which employees are exposed, they shall be protected by spectacles, cup goggles, helmets or hand shields equipped with filter lenses.

Filter lenses shall be of a shade number appropriate to the type of work to be performed as indicated in Table 1 except that variations of one or two shade numbers are permissible to suit individual preferences.

If filter lenses are used in the goggles worn under the helmet, the shade number of the lens in the helmet may be reduced so that the sum of the shade numbers of the two lenses will equal the value shown in Table 1 (see your Supervisor).

Protection of Passerby - Passerby must be protected against eye hazards by screens, shields, enclosures, barricades and other suitable safeguards.

Safety Glasses - Employees who wear prescription glasses and whose prescription is less than two years old, may obtain prescription safety glasses through the company at a reduced cost. The employee pays only the cost of the lenses. Standard safety frames will be furnished free of charge by the Company. Fancier frames and tinted lenses are available at an additional cost to the employee.

Respirators - Several types of respirators, provided for a variety of purposes, are located at the main Tool Room. Tool Room staff are available to assist in determining the proper type to use. Production Supervisor is to assist in determining proper cartridge based on work process and shall contact the Safety Department for guidance as needed.

A respirator will not fit properly over facial hair. Mustaches and sideburns are acceptable as long as no facial hair extends into a respirator seal area. The following are updated sketches of acceptable facial hair areas as they pertain to our Safety & Health Policy. This policy is in effect and applies to all Todd personnel, craft and administrative, with the following exceptions:

- Todd and non-Todd personnel whose duties do not require them to enter onto vessels, dry-dock areas or shop areas
- Non-Todd casual visitors on observation visits only, when accompanied by a Todd employee, provided the visit to restricted area is limited in time (less than two hours) and is completed expeditiously.
- Other Todd and Non-Todd personnel involved in delivery and pick up providing they proceed by a designated route directly to the point of delivery and/or pick up and depart the restricted areas expeditiously by a designated route.
- The following points are to be emphasized:
- No employee will be tested for or issued a respirator that does not comply with this policy
- All employees whose duties require their entry into production areas; vessels, dry-dock areas, piers and shop areas are to comply with this policy daily.

- Compliance with this policy is a condition of employment.

Hearing Conservation Program - Ear protection (plugs and/or muffs) must be worn in all areas where noise level warning signs are posted. These signs are posted in various shops, work areas and on vessels. Ear protection shall also be worn by employees doing work where the possibility exists that molten metal could fall and lodge in their ears. Ear protection (plugs and/or muffs) are available from the Tool Room.

Dispensary personnel conduct audiometric tests as required by the OSHA Hearing Conservation Standard. Any questions regarding these tests or proper fitting of hearing protectors should be directed to Dispensary staff. Any questions concerning noise levels should be directed to the Safety Department.

Full Body Harnesses - Full Body Harnesses are available and must be worn whenever the nature of the work indicates the need, mainly in high spots where the installation of staging with handrails is not feasible or practical.

Use of full body harnesses in elevated locations where safety railings are not provided.

Life Jackets - Life Jackets must be worn at all times by persons working over water. Wear a life jacket on floats or over water where safety railings are not provided. The life jacket must be fastened to be effective when it is needed.

Maintenance of Safety Equipment - All safety equipment listed above and many other items not listed are available at the Main Tool Room. All personal safety devices issued by the Tool Room have been thoroughly cleaned and sterilized. If, because of the nature of the job, the safety equipment (other than the Hard Hat) becomes too dirty to use or if filters need changing, etc., then return the item to the Tool Room and it will either be serviced or replaced.

FIRST AID & MEDICAL SERVICES

The Company considers safety of its employees of prime importance and has established safety programs for your protection. Our facilities include a medical center fully equipped and staffed with a trained and professionally certified medical team from 7 a.m. to 11:30 p.m., Monday through Friday. Report all accidents to the medical center immediately. Safety personnel are on duty in the yard for all regular shifts.

Because of the possibility of infection or other types of complications, all on-the-job injuries, including minor injuries, should receive prompt medical care. If medical services are necessary when the dispensary is closed, contact the Yard Office or Guard at the main gate. Except in an emergency, a Dispensary Dispatch slip or

completed Accident Report and Investigation form, signed by your supervisor, is required to receive medical services.

Do not go to the doctor or hospital without reporting to the Dispensary or when the dispensary is closed, to the Yard Office or Guard at the main gate. The law provides that the employee may go to a doctor or hospital of his own choosing but must have prior authorization from the Employer. The Company may challenge medical bills incurred by an employee who has not reported the injury to the Employer.

Todd voluntarily provides a limited amount of first aid service for minor, non-industrial injuries and illnesses. The term "non-industrial" refers to minor conditions received at home or during other off-the-job activities.