PEAK NDT
SOLUTIONS

Safety & Environmental Management System (SEMS) Safety Manual

“PROTECTING PEOPLE & THE ENVIRONMENT”

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1.0 Purpose, Scope and Applicability

This manual establishes the responsibilities and safe work practices used to protect personnel, property and the environment during PEAK NDT Solutions operations.
It applies to PEAK employees and applicable subcontractors working under PEAK's direction at client locations, PEAK-controlled work areas and during work-related travel.

PEAK operations include:

- Non-Destructive Testing (NDT)
- Eddy Current Testing (ET)
- Magnetic Particle Testing (MT)
- Ultrasonic Testing (UT)
- Penetrate Testing (PT)
- Hardness Testing (HT)
- Phased Array Testing (PAUT)
- Electromagnetic Testing (EMI)
- Full Length EMI (FLUT)
- Level III support and NDT training.

Applicable requirements shall be determined by the work and location. Offshore assignments subject to 30 CFR Part 250, Subpart S shall follow the operator's agreed SEMS requirements and PEAK's contractor responsibilities. Specialized activities outside the approved inspection scope require separate review, procedures, qualifications and authorization.

2.0 HSE Policy and Responsibilities

PEAK shall provide the resources, training, equipment and supervision necessary to perform assigned work safely.

Personnel shall follow applicable regulations, PEAK procedures, client requirements and manufacturer instructions. Work shall not proceed with uncontrolled hazards.
Management shall:

- Approve policies and assign responsibilities.
- Provide adequate resources.
- Support reporting and Stop Work Authority.
- Establish annual HSE goals.
- Review performance and improvement needs.

Operations and supervisors shall:

- Confirm scope, qualifications and client requirements.
- Conduct pre-job planning.
- Verify permits, equipment, PPE and protective controls.
- Coordinate work with the client.
- Address hazards and report incidents.

QSHE shall:

- Maintain safety procedures and records.
- Coordinate safety training and communications.
- Assist with hazard assessments and investigations.
- Track corrective actions.
- Monitor applicable regulatory and client requirements.

Employees shall:

- Follow approved instructions.
- Participate in JSEAs and safety discussions.
- Inspect assigned equipment and PPE.
- Report hazards, incidents and near misses.
- Perform only work within their qualifications and authorization.

The designated technical authority shall oversee NDT procedures, technical qualifications and technical decisions within the assigned scope.

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3.0 Client Site Coordination and Offshore SEMS Requirements

Before work begins, PEAK shall coordinate:

- Inspection scope and reporting requirements.
- Site orientation and access.
- Personnel qualifications.
- Process hazards and equipment conditions.
- Permits, isolation and safe access.
- Emergency arrangements.
- Incident reporting and environmental requirements.

For SEMS-covered assignments, PEAK and the operator shall document agreement on applicable contractor safety and environmental practices before work.

PEAK should support facility hazard reviews, mechanical integrity and pre-startup reviews within its contracted inspection scope. Subcontractors should undergo review of relevant safety performance, qualifications, procedures and equipment before assignment.

4.0 Hazard Identification and JSEA

PEAK shall identify and evaluate hazards before inspection work begins.
The supervisor shall conduct a documented Job Safety and Environmental Analysis with participating personnel.
The JSEA shall identify:

- Work steps and inspection method.
- Safety, health and environmental hazards.
- Equipment and chemical products.
- Required PPE, permits and isolation.
- Safe access and nearby operations.
- Protective controls and responsible personnel.
- Emergency arrangements.

Personnel shall understand the controls and sign before starting work. Keep the JSEA available at the work location.

Review the JSEA each day or shift and when personnel, scope, equipment or conditions change. For SEMS-covered offshore activities, the onsite crew supervisor shall conduct and sign the JSEA, participating personnel shall understand and sign it, and the operator-designated individual in charge of the facility shall approve and sign before work. Include Stop Work Authority expectations on the JSEA.

5.0 Stop Work Authority and Restart Authorization

All personnel have the authority and responsibility to stop work when an unsafe condition, environmental concern or uncontrolled hazard is identified.
When work stops:

1. Stop the activity safely.
2. Inform affected personnel and the client.
3. Evaluate the concern.
4. Establish and verify corrective measures.
5. Update affected work documents.
6. Brief personnel and obtain required restart authorization.

Personnel receiving a stop-work instruction shall comply immediately.
For SEMS-covered offshore work, the facility's designated individual with Ultimate Work Authority determines when the imminent danger no longer exists and authorizes restart.

Document the decision in writing as soon as practicable. Personnel shall know who holds facility UWA, including changes during handover. PEAK supervision is not automatically the facility UWA.

No person shall face retaliation for exercising Stop Work Authority in good faith

6.0 Human Factors, BBS and Employee Participation

Personnel should consider human factors affecting inspection work, including:

- Fatigue and heat.
- Distraction and interruptions.
- Communication difficulties.
- Unfamiliar equipment or tasks.
- Workload and time pressure.
- Awkward positions and limited access.

PEAK should use BBS observations to identify safe practices, hazards and opportunities for improvement. Observations should consider work conditions as well as individual actions. Employees may use the available BBS process or call or text QSHE for help recording an observation.

Urgent hazards require immediate protective action and direct communication.

QSHE shall retain reports, assign actions and communicate follow-up. A text does not replace required permits, JSEAs or incident documentation.

Employees shall have access to relevant procedures and opportunities to contribute to safety reviews. Document employee input and resulting decisions.

Employees may report concerns directly to appropriate authorities without first completing internal escalation. For offshore concerns, the BSEE Safety Hotline is 1-877-440-0173. Verify access to the operator's required reporting notice and applicable USCG reporting instructions.

7.0 Management of Change

PEAK shall review changes that may affect safety, environmental protection or inspection validity before implementation.

Changes may involve:

- Inspection scope or method.
- Procedures or acceptance requirements.
- Equipment, materials or chemicals.
- Personnel competence or supervision.
- Access or operating conditions.

Document the reason, technical basis, hazards, controls, required approvals and implementation period. Operations and QSHE shall approve changes within their responsibilities. Obtain technical authority and client approval when their procedures or responsibilities are affected.

Temporary changes shall have an expiry date or defined return conditions. Update documents and brief or train affected personnel before changed work begins. Verify readiness and document closure. Equivalent replacements with unchanged performance and risk may be treated as replacement in kind.

8.0 Training, NDT Qualifications and Competency

PEAK shall verify that personnel have the training and competence necessary for assigned duties.
Requirements shall reflect:

- NDT method, level and technique.
- Applicable written practice and inspection procedures.
- Identified hazards.
- Equipment used.
- Client and location requirements.

Personnel shall not independently perform, interpret or accept examinations beyond their authorized scope. Safety training shall cover applicable orientation, JSEA, Stop Work Authority, reporting, PPE, chemical hazards and emergency arrangements.

Verify offshore travel and operator qualifications before mobilization.

Maintain training and competency records, including instructor qualifications where required. Track renewals and provide additional training after relevant changes or identified performance gaps.

9.0 Personal Protective Equipment

PEAK shall assess inspection activities to determine required PPE and maintain written certification of the workplace hazard assessment.
PPE selection shall consider:

- Client site requirements.
- Impact, sharp edges and hot surfaces.
- Chemical contact and splash.
- Noise and other identified exposures.
- Inspection access and fall hazards.

Employees shall receive training on selection, proper use, limitations, inspection and care. Verify understanding through demonstration and complete PEAK's training records.

Inspect PPE before use and replace damaged, contaminated or unsuitable items before continuing work.

Follow the controlled PPE procedure for specific selections and issue requirements. Respiratory and fall protection require their applicable specialized controls in addition to general PPE instruction.

10.0 Inspection Chemicals, Hazard Communication and SDS

PEAK shall maintain a written hazard communication program covering hazardous chemicals used in its operations.
The program shall include:

- A chemical inventory.
- Container labeling.
- Accessible Safety Data Sheets.
- Employee information and training.
- Chemical-hazard exchange with clients and affected employers.

Before using penetrants, cleaners, developers verify the required ventilation, PPE, storage, temperature limits and disposal arrangements.

Do not use unidentified products. Label secondary containers unless an applicable immediate-use exception applies.

Provide training before initial exposure and when new chemical hazards are introduced.
If respiratory protection is required, establish the applicable written program, medical evaluation, fit testing and training before assignment.

11.0 NDT Equipment Safety, Calibration and Inspection Integrity

Inspectors shall use approved procedures and equipment suitable for the examination and location.
Before use:

- Verify equipment identification and calibration status.
- Complete required reference and performance checks.
- Inspect probes, cables, connectors and power supplies.
- Confirm consumable suitability.
- Verify component identity and examination requirements.

Remove defective or overdue equipment from service. The technical authority shall determine whether previous results require review, reinspection or client notification.

12.0 Safe Inspection Access and Work Area Controls

Inspection locations shall have safe access and adequate work-area controls.
Personnel shall:

- Use suitable ladders, platforms, scaffolds or lifts.
- Follow required training and authorization.
- Keep exits and walkways clear.
- Control cables, hoses and couplant.
- Secure tools and equipment where dropped objects could injure others.
- Respect lifting, electrical and other exclusion zones.

Where fall exposure exists, verify suitable protection, anchorage, clearance and rescue arrangements before work. Coordinate nearby hot work, pressure testing and other operations that may affect the inspection. Do not disturb unknown coatings, insulation or deposits until their hazards have been evaluated.

Confined space entry requires the applicable written procedures, host coordination, trained roles, atmospheric controls and rescue arrangements before entry.

For isolated work, establish communications, check-in intervals and missed-contact escalation. Do not work alone where additional personnel are required for protection or rescue.

13.0 Electrical and Hazardous Energy Awareness

Electrical inspection equipment shall be suitable for the location and maintained in safe condition.

Inspect cords, plugs, lamps and batteries before use. Remove damaged equipment and use required ground-fault protection.

Do not assume that low-voltage equipment is suitable for a hazardous classified area.

Unqualified personnel shall not open energized panels, troubleshoot circuits or perform exposed electrical work.

Where unexpected startup, movement or energy release could injure personnel, coordinate the applicable isolation procedure with the client before work.

Only trained and authorized personnel shall perform assigned isolation and verification duties.

Maintain protection during group work, testing and shift changes. Never restart locked or tagged equipment or remove another person’s lock outside the applicable authorized procedure.

Do not operate valves, loosen fittings or open pressure boundaries without specific authorization.

14.0 Heat Illness Prevention and Fitness for Duty

Supervisors shall evaluate temperature, humidity, workload, protective clothing and acclimatization when planning field work.

Provide drinking water, suitable recovery areas and rest opportunities. Adjust work as conditions require.

Employees shall promptly report dizziness, headache, nausea, weakness or other heat symptoms.

Suspected heat stroke, including confusion or collapse, requires emergency assistance and immediate cooling while help is coming. Do not leave the person alone.

Suspend work when lightning, wind, visibility or other weather conditions compromise safe access or escape.

Employees shall report fatigue, impairment or limitations affecting safe performance.

15.0 Driving and Handling Inspection Equipment

Drivers shall hold the required license and authorization and follow road and client traffic rules.
Employees shall:

- Wear seat belts.
- Check vehicles for obvious safety defects.
- Secure instruments, tools and chemicals.
- Park safely before handling work messages.
- Avoid driving while impaired or excessively fatigued.
- Report vehicle incidents promptly.

Plan unfamiliar or remote journeys, including routes, weather, communications and emergency assistance.

Assess equipment weight, shape and handling route before lifting. Use carts, mechanical aids or team assistance when appropriate.

Keep clear of suspended loads and pinch points. Rigging and lifting-equipment operation require specific training and authorization.

16.0 Environmental Protection and Waste Disposal

Employees shall prevent inspection chemicals, couplant and contaminated materials from entering drains, soil or waterways.
Before work, identify approved:

- Storage and secondary containment.
- Spill-response arrangements.
- Waste containers.
- Disposal responsibilities.

Keep containers closed, labeled and protected from damage.
Handle used chemicals, aerosols, wipes and absorbents according to product hazards and site requirements.

Report spills, sheens and unintended releases immediately to the client and QSHE.

Stop the source only when safe and within training. Isolate unknown or uncontrolled releases and request the site response team.

Perform cleanup only within approved training and capability. Follow applicable offshore marine-debris requirements.

17.0 Emergency Preparedness and Medical Response

Before work, confirm:

- Emergency number and alarm method.
- Exact location and emergency access.
- Evacuation routes and muster points.
- First-aid, medical and rescue resources.
- PEAK's job-specific contact and alternate.

During an emergency, stop safely, activate assistance and follow site instructions. Call 911 where appropriate.

Evacuate when directed and report for accountability. Provide aid only within training and use appropriate barriers against blood exposure.

Where assigned duties create occupational bloodborne-pathogen exposure, establish the required exposure control plan, training and medical arrangements.

Attempt incipient-stage firefighting only when trained, authorized and able to escape safely. Participate in required client drills. Conduct at least annual PEAK emergency instruction or exercises appropriate to operations and document improvement actions.

18.0 Incident, Near-Miss and Unsafe Condition Reporting

Employees shall promptly report:

- Injuries, illnesses and exposures, including first-aid events.
- Near misses and unsafe conditions.
- Environmental releases.
- Vehicle incidents and property damage.
- Equipment failures affecting safety or inspection validity.

Obtain help and control immediate danger first. Notify the supervisor, client representative and QSHE.

Call for urgent events. A text may begin routine notification, but confirm receipt and complete required reports afterward.

Preserve evidence when safe. Protect medical information and client confidentiality.

Qualified personnel shall investigate incidents and high-potential near misses to identify contributing conditions and underlying causes.

Assign corrective actions, owners and dates. Verify effectiveness and communicate relevant lessons.

Management and QSHE shall determine applicable external reporting duties promptly. Client notification does not automatically satisfy PEAK's independent obligations.

19.0 Inspections, Audits and Corrective Action

PEAK shall conduct inspections and audits appropriate to its inspection operations.
Reviews shall include:

- Work-area conditions and protective controls.
- Inspection equipment and calibration records.
- PPE and vehicles.
- JSEAs and client requirements.
- Qualifications and training.
- Employee understanding.
- Reporting and corrective actions.

Conduct an internal management-system audit at least annually. Review PEAK-controlled work areas at least quarterly where applicable.

Correct immediate hazards before affected work continues.
Document other findings with an owner, due date and interim controls where needed.
Escalate serious or overdue actions and verify effectiveness before closure.

20.0 Recordkeeping, Document Control and Management Review

QSHE shall maintain approved documents, revision history and access to current procedures. Management approval establishes the effective date. Remove superseded versions from active use while preserving required history.

Maintain applicable:

- Training and qualifications.
- JSEAs and client agreements.
- Equipment checks, calibration and maintenance.
- Inspection records.
- Management of Change records.
- BBS and employee participation records.
- Incident investigations.
- Audits and corrective actions.

Records shall be identifiable, retrievable and protected from loss or unauthorized alteration.

REFERENCES

The following references apply according to the work performed, location and identified hazards:

- **30 CFR Part 250, Subpart S** — Safety and Environmental Management Systems, including applicable contractor responsibilities.
- **API Recommended Practice 75** — Safety and environmental management guidance, using the edition incorporated by applicable regulation or specified by the operator.
- **OSHA 29 CFR Part 1910** — Applicable general industry safety and health requirements.
- **OSHA 29 CFR Part 1926** — Applicable requirements when inspection activities involve construction work.
- **OSHA 29 CFR Part 1904** — Occupational injury and illness recording and reporting requirements.
- **PEAK NDT Solutions' applicable NDT Written Practice** — Personnel qualification and certification requirements.
- **Approved NDT procedures and applicable inspection codes and standards** — Requirements for the assigned method, examination and acceptance criteria.
- **Equipment manufacturer instructions and Safety Data Sheets** — Safe operation, inspection, maintenance and chemical-handling requirements.
- **Applicable client and operator requirements** — Site rules, permits, emergency procedures and SEMS bridging agreements.
- **PEAK NDT Solutions' controlled procedures** — Supporting PPE, training and other task-specific safety requirements.

Use the legally applicable edition of regulatory references and the editions specified by the contract or approved procedure for technical standards.