

FRC Program Implementation Q&A

- 1) **Question:** Why is UAD-GoM implementing a FRC Program?
Answer: The DWLT and PLT made the decision to move forward with a UAD-GoM FRC Program in March of 2012 to get us aligned with other businesses within Shell. The internal PPE mandatory manual and external regulations and policies (such as OSHA and NFPA) don't mandate FRC but do require companies to assess the work place to determine if hazards are present or likely to be present, which require the use of FRC or other PPE. Despite the advances in our processes and our engineering controls, the potential for flash fires exists whenever hydrocarbon gases or liquids are handled in certain operations. In reviewing industry historical incidents, the use of FRC has proven to be of value in reducing the severity of burns and to save lives. Moving to a FRC program adds another level of protection.
- 2) **Question:** Why do we have to go through a reimbursement process, can we handle as we currently do for gloves and other safety equipment through the warehouse, or through expense reimbursement through Pro Master, or can we have a set allowance that is paid to us via payroll and employees manage purchase based on need?
Answer: currently we have set the process to be consistent with how we handle reimbursement for the safety shoe program. The first round of purchase will be procured through location work orders for the offshore locations and through an overhead based project. Not everyone has a Procard to purchase FRC so that option doesn't work for the majority of the offshore community. We will further review the option of purchase via the warehouse or some equivalent method where the offshore community can secure FRC without reimbursement.
- 3) **Question:** Do the catering staff know how to properly launder FRC?
Answer: Yes, they will be trained before the December 1, 2012 implementation date. We have met with Sodexo and Sonoco Operations management along with the VP of Technical Services of Westex to discuss questions around need to separate FRC from other clothing, detergent type, wash/dryer temperature requirements, use of bleach containing detergents/bleach products, use of fabric softeners in the washer/dryer, type of water (soft vs. hard), etc. Sodexo and Sonoco management is working on creating an operating procedure/instruction guide for FRC laundering requirements along with training their staff.
- 4) **Question:** What measures will we put in-place to handle heat illnesses associated with FRC?
Answer: Heat illness can only be combated by being more vigilant with what we currently do for heat illness. We have to inform employees and contractors to manage work rest cycles, add breaks into the work plan, take breaks as needed as each employee's needs may be different, drink cool fluids as recommended, if possible rest in the shade, use of fans, monitor the weather, look out for each other, and educate people on the symptoms of heat illness and what to do if an employee is showing symptoms of heat illness.
- 5) **Question:** Are we also requiring FRC skull caps, face covering, or gloves? (Painters wear skull caps and face covering)

Answer: The requirement for FRC does not cover skull caps or face covering used by painters. At this time, we do not have plans to include FRC gloves within our FRC program.

6) **Question:** Will the HLOs and HDAs require FRC vests?

Answer: Yes, SMS is in the process of purchasing NFPA 2112 certified vests which will be worn over the FRC.

7) **Question:** How are we communicating with our contractors?

Answer: UAContractor.com has been updated to announce the new requirement for FRC while working in UAD-GoM including a link to the updated PPE standard, mass e-mails have gone out to the contractors announcing the change (the contractor e-mails have been gathered from ISNetworld and BCD communication distribution lists), normal BCD communication, offshore communications via the HSE technicians, during business reviews with CP, and via a desk drop note.

8) **Question:** Will the FRC fit us?

Answer: Yes, that is the reason for the dedicated order days at the heliport and OSS. Other dates and venues for ordering may be organized based on need. The vendor has agreed to leave try-on FRC at the OSS and RTC for people to try on FRC for sizing purposes if they miss one of the dedicated ordering events. It is important to note that Non-Stock Items are not returnable.

9) **Question:** Can we have our names embroidered inside the pants to prevent confusion while being laundered.

Answer: We will request this from the vendor.

10) **Question:** Will 2 sets of FRC be enough for offshore employees? Concerns around laundering every day and what happens if one set is in the laundry and the other gets soiled?

Answer: We will allow the offshore employees to order 3 sets initially then subsequent years up to two sets per year as needed and approved by the supervisor.

11) **Question:** Will we be allowed to purchase a jacket liner for cold weather?

Answer: Upon need and supervisor approval.

12) **Question:** Can we add women's jeans to the selection in the catalog of options?

Answer: We are looking into our options and once determined will be communicated to the affected employees.

13) **Question:** Why do we have to common raingear?

Answer: The concept was based on the fact that not everyone works out in the rain and having easily accessible raingear in a warehouse or someplace equivalent would meet the need for rainwear. However, if locations want to have dedicated raingear for those employees

(operators, mechanics, electricians, leadership, etc) that may have a need to work in the rain can and some centralized supply for others.

14) **Question:** Does the FRC standard apply to new Greenfield projects?

Answer: After discussions with Marvin Blanchard, we have decided that this mandate be triggered at first hydrocarbon production. This is consistent with when we will actually switch over to the UAD HSE Management System. At this point, all of UAD's Business Controlling Documents, Policies & Practices are fully applied. It makes sense that the FRC mandate follows the same trigger criteria.

15) **Question:** Does the new FRC mandate apply to terminals?

Answer: Still working this question and once applicability is determined we will communicate the requirements to the affected employees and contractors.

16) **Question:** If FRC are reimbursed will we have to pay income tax via payroll?

Answer: No, the reimbursed amount is not taxed and it shows in your after-tax income.

17) **Question:** How will we handle the new hires that will be on boarded after August?

Answer: We can offer special order events in advance to allow enough time for the order to be processed, we can leave try-on FRC at OSS or RTC, or we can choose for the new hires to order only coveralls this would guard against the need to be fitted as coveralls are more forgiving with sizing as opposed to pant/shirt combination which would require more precise sizing.

18) **Question:** Will the contractors be able to order their FRC during the Shell order events?

Answer: No, the order events are specifically for only Shell UAD-GoM employees.

19) **Question:** Can other Shell support groups (such as P&T, UA functional groups – SE/SD, HR, Finance, Shell Pipeline, etc.) order their FRC during the UAD-GoM FRC order events?

Answer: Yes, as long as they have a means of payment such as a credit card.

20) **Question:** Why can't employees order their own FRC from their vendor of choice?

Answer: We cannot control the quality of the FRC in terms of protection, durability and value if everyone is allowed to purchase from their vendor of choice, we have also negotiated a contract with a vendor that supplies FRC for Shell Oil Company/Motiva Enterprises, and finally our FRC procurement process with a single vendor with a selective catalog aligns with approaches within other Shell organizations.

21) **Question:** Will we have to wear FRC if and when we need to go to drilling rig floor since UAO-Wells policy went in effect July 1, 2012?

Answer: No, UAO-wells policy states that UAD employees are not required to wear FRC on the rig floor. However, we will be required to wear FRC on any PPE required areas on December 1, 2012.

22) **Question:** Will electricians or those performing electrical work have to follow the new FRC requirement?

Answer: All employees and contractors should follow the requirements of HSE0038 (Electrical Safe Work Practices) for information regarding tasks which require special arc flash PPE. However, if special arc flash PPE is not required then normal flash fire FRC certified to NFPA 2112 should be worn (refer to HSE0038).

23) **Question:** Are there any special laundering requirements for anyone that has a need to wash FRC at their home?

Answer: It is recommended that any FRC soiled with hydrocarbon be washed offshore or washed separately from other clothes to avoid cross contamination. Please refer to the home laundering guide on the BCD website for further instructions.