



Process Safety Management/Contractor Responsibilities

PURPOSE

The purpose of this document is to outline the Process Safety Management / Contractor Responsibilities for **Fisher Systems Inc.**; hereafter referred to as "The Company." The purpose of Process Safety Management is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries, etc.

RESPONSIBILITIES

Safety Officer

- The Safety Director is responsible for issuing information and documents to the contractor and collection and review of contractor information and certifications
- Ensure adequate records are obtained from contract employees
- Enforcement of this program
- Ensure that each contract employee follows the safety rules of the facility including the safe work practices - [OSHA Standard 1910.119](#)

Contract Employees

- The Company shall advise the contract employer of any unique hazards presented by the Company, or of any hazards found by the contract employer's work
- Follow all procedures/rules set forth in this policy

POLICY

Contractors under the Process Safety Management program are those who are involved in the installation or maintenance of equipment and systems at this facility. All contractors, covered in this PSM Program will be provided necessary information concerning the process, equipment, and procedures applicable for each project.

TRAINING FOR PROCESS MAINTENANCE ACTIVITIES

The Company shall have each employee involved trained in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner.



PRE-WORK REVIEW

Prior to commencing work, as the contractor, The Company will ensure the following occur:

- Obtain and evaluate information regarding the contract employer's safety performance and programs
- Each contract employee is instructed in the known potential fire, explosion or toxic release hazards related to his/her job and the process and the applicable provisions of the emergency action plan
- Provide contractors with copies of local safety programs, safety and emergency procedures and a copy of this PSM program
- Complete all the requirements of the Company Contractors Liability Agreement
- Inform the contractor that a periodic performance evaluation will be conducted to ensure the contractor and contract employees are fulfilling their obligations
- Inform the Contractor that a contract employee injury and illness log related to the contractor's work in process areas must be maintained on site for the duration of the contract work
- The contractor employer provides information relating to any unique hazards presented by the contractor employees work, or any hazards found by the contractor employees

Prior to the start of any work as the contractor; The Company will provide the following documentation:

- Their safety program information and other documentation required by the Company contractors Liability and Safety Agreement
- Records which contain the identity of the contract employee, the date of training and the means used to verify that the employee understood the training must be maintained
- Certification that they have informed their employees of potential fire, explosion, or toxic release hazards may exist at or near their work area at this facility and that they have explained the Company facility Emergency Action Plan to their employees
- Training documentation concerning training provided to their employees to ensure they understand the safe work necessary to safely perform tasks
- Certification that they have explained the Company Hot Works Permit Program and other permits Company uses that will be needed during their time on Company property
- Contract employees shall not perform hot work until a hot work permit is obtained from employer.
 - The permit shall document that the fire prevention and protection requirements in have been implemented prior to beginning the hot work operations.
- Each contract employee must be trained in the work practices necessary to perform his/her job.
- Agreement to advise Company of any unique hazards presented by their work any found during their work



- Certification that materials, parts and equipment to be installed meet industry and engineering standards for the application used

Contractor employees shall abide by employer's safe work practices during operations such as Lockout/Tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.

HOT WORK PERMIT

Contract employees shall not perform hot work until a hot work permit is obtained from employer. The employer shall issue a hot work permit for hot work operations conducted on or near a covered process.

The permit shall document that the fire prevention and protection requirements in [29 CFR 1910.252\(a\)](#) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed. The permit shall be kept on file until completion of the hot work operations. [29 CFR 1910.119\(k\)\(2\)](#)

MANAGEMENT OF CHANGE

The Company shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to facilities that affect a covered process.

The procedures shall assure that the following considerations are addressed prior to any change:

- The technical basis for the proposed change
- Impact of change on safety and health
- Modifications to operating procedures
- Necessary time period for the change
- Authorization requirements for the proposed change

Employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process shall be informed of, and trained in, the change prior to start-up of the process or affected part of the process.

REPORTING/ACCIDENT INVESTIGATION

Employees must immediately report all accidents, injuries and near misses. An incident investigation must be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained 5 years.



An incident investigation team shall be established and consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident. [29 CFR 1910.119\(m\)\(3\)](#)

A report shall be prepared at the conclusion of the investigation which includes at a minimum:

- Date of incident
- Date investigation began
- A description of the incident
- The factors that contributed to the incident
- Any recommendations resulting from the investigation

INSPECTION AND TESTING

Inspections and tests shall be performed on process equipment.

Inspection and testing procedures shall follow recognized and generally accepted good engineering practices.

The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.

The Company shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

EQUIPMENT DEFICIENCIES

The Company shall correct deficiencies in equipment that are outside acceptable limits before further use or in a safe and timely manner when necessary means are taken to assure safe operation.

PROTECTION OF TRADE SECRETS

All contract employers must respect the confidentiality of trade secret information when the process safety information is released to them.



QUALITY ASSURANCE

In the construction of new plants and equipment, the employer shall assure that equipment as it is fabricated is suitable for the process application for which they will be used.

Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.

The Company shall assure that maintenance materials, spare parts and equipment are suitable for the process application for which they will be used.