


<i>HEALTH AND SAFETY MANUAL</i>	
Title: Process Safety Management of Highly Hazardous Chemicals	
Approved by: Greg Savoy	4/4/13

Process Safety Management is the proactive identification, evaluation and mitigation or prevention of chemical releases that could occur as a result of failures in process, procedures or equipment. The major objective of process safety management of highly hazardous chemicals is to prevent unwanted releases of hazardous chemicals especially into locations, which could expose employees and others to serious hazards.

The Company is required to recognize and participate as a contract employer at locations with PSM Programs in place. The Company as a contractor has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows [29 CFR 1910.119(h)(3)]:

- The contract employer shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.
- The contract employer shall assure that 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.
- The contract employer shall document that each contract employee has received and understood the training required by this paragraph. The contract employer shall prepare a record, which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training.
- The contract employer shall assure that each contract employee follows the safety rules of the facility including the safe work practices required by paragraph (f)(4) of this section.
- The contract employer shall advise the employer of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.
- The contract employer will assure that trade secret information will be kept in confidence as process safety information is released to them.

The Company, as a contract employer shall follow safe work practices established by the employer. [1910.119(f)(4)] The employer shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; hot work; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees. To comply with 1910.119(f)(4) Company employees are required to complete all required documentation for any permit-required activities.

Company employees are required to report all incidents to their immediate supervisors as quickly as possible. [1910.119(m)] In the event of a catastrophic release or an incident with the potential to

create a catastrophic release of highly hazardous chemicals in the work place, an incident investigation shall be initiated as promptly as possible, but no later than 48 hours.

In the event the Company becomes the sole operator of a facility, the existing PSM Program for that facility may be amended and adopted or in the absence of a PSM Program an assessment will be required prior to assuming operating responsibilities.

NOTE: Hot work shall not be performed until a Hot Work Permit is obtained from Company, Host Facility, or Client, etc..

References:

29 CFR 1910.119, Process Safety Management of Highly Hazardous Chemicals.

Exhibits:

None.