1.0 Policy

To comply with all owner-client written procedures and standards that communicate the potential hazards of chemicals and the consequences associated with catastrophic releases of toxic, reactive, flammable, or explosive chemicals that may result in fire, explosion, or toxic hazards.

2.0 Purpose

To define the requirements necessary to interface with Process Safety Management practices as a contractor.

3.0 Scope

Applies to all Sunbelt Controls work sites for owner-clients who must have a Process Safety Management program.

This standard does not apply to incidental services which do not influence process safety and are not associated with any other hazardous chemical. Examples include:

- Retail facilities (laundries, supply services, janitorial work)
- Oil or gas well drilling or servicing
- Normally unoccupied remote facilities

4.0 Definitions

Process Safety Management (PSM) – refers to the OSHA Process Safety Management standard for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals that may result in fire, explosion, or toxic hazards. A listing of applicable chemicals and quantities is located in Appendix 27-A. Flammable liquids and gases are applicable when quantities equal or exceed 10,000 pounds, and they are not used solely for workplace consumption or as otherwise defined by OSHA.

Covered Process Areas – any system that contains or produces toxic, reactive, flammable, or explosive chemicals

5.0 Requirements

5.1 Owners

Owners are required to inform contract employers of the following:

- Any known potential fire, explosion or toxic release hazards related to contract work and the process
- The applicable provisions of the Emergency Action Plan that apply to contractors
- The entry control methods to covered areas and the extent controls exist in covered process areas

Owners are also required to:

- Maintain a log of contractor occupational injuries and illness
- Evaluate contractor safety performance and programs

5.2 During the Bid Phase

In order to comply with the standards that apply to service providers or contractors, information shall be obtained during the proposal or bidding stage.

To ensure this information is obtained a written request should be directed to the potential client requesting the following information if it is not provided:

- Will the scope of work be performed in areas adjacent to or on "covered process areas"?
- What provisions of the Emergency Action plan will apply to our scope of work?
- How do we notify you of hazards identified through the course of performing work?
- Do you have special training requirements that would apply to our employees who perform work in "covered process areas?
- What control methods do you use to control hazards during operations and during the performance of the scope of work?

5.3 Upon Contract Award

A written plan shall be developed and communicated to work site supervision, employees and safety coordinators. The following is a list of topics that should typically be included in this plan:

- Methods of controlling operations during the performance of work
- Lockout and Tagout procedures
- Confined Space Procedures
- Methods to notify the client of hazards identified during the performance of work and the name of the client representative who receives these reports
- Procedures for opening process equipment and piping
- How the entrance into "covered processes" is managed (this is usually a work permit system)
- Hot Work Permit Procedure
- What training is required and who is required to attend
- How training is documented
- Safety rules of the client facility
- Sunbelt Controls safety requirements

5.4 Executing Work

Employees shall be trained / qualified to perform their work assignments in "covered processes". This training is in addition to normal training requirements and shall be site-specific. Ensuring employees are qualified can be accomplished through a combination of verification of experience, observation, instruction, and written assessments. As applicable, employees shall be trained in:

- Emergency Action Plan
- Lockout and Tagout
- Confined Space Work
- Work Permit Systems
- Hazardous Chemicals

5.5 Performing Operations Work

All provisions of the Process Safety Management Standard apply to employees of Sunbelt Controls who are performing operations work in "covered process areas".

Under these circumstances the senior person responsible for the contract or work shall ensure Sunbelt Controls employees receive the training and instruction required by the client Action Plan, that required training is conducted, and the requirements of this standard relative to performing work and training are satisfied.

6.0 References

OSHA CFR 29 1910.119