**PROCESS SAFETY MANAGEMENT**

The purpose of Process Safety Management (PSM) is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals in various industries such as refineries, etc. Typically, we would follow the PSM that a facility has in place.

**Scope**

Piedmont Service Group (PSG) is required to recognize and participate as a contract employer at client locations with PSM Programs in place. PSG, as a contractor, has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows:

• PSG has a responsibility (as the contractor) to train all employees necessary to perform their job. PSG shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.

• PSG (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.

• Training shall be documented. 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.

• Employee Evaluation Program – All employees will be evaluated to ensure required training, participation and knowledge of the client’s PSM requirements are completed and documented.

• PSG shall assure that each contract employee follows the safety rules of the facility including the safe work practices required with 1910.119(f)(4).

• PSG (the contract employer) shall advise the host employer of any hazards found or unique hazards presented by the contract employer's work. PSG shall advise the host employer of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.

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

**Responsibilities**

**Process Safety Information:**

PSG employees shall participate in all as directed client PSM requirements, including:

• Employee Participation

• Process Safety Information (PSI)

• Process Hazards Analysis (PHA)

• Operating Procedures

• Training /Employee Evaluation

• Pre-Startup Safety Review (PSSR)

• Mechanical Integrity

• Hot Work Permits

• Incident Investigation

• Emergency Planning and Response

• Compliance Audits

• Trade Secrets

**Piedmont Service Group Duties:**

The host employer’s safe work practices must be followed during operation such as lockout/tagout, confined space entry, opening process equipment or piping and control over entrance to facility. PSG employees shall abide by the host employers safe work practices during operations such as lockout/tagout,

confined space entry, opening process equipment or piping and controls over entrance to facility.

To comply with 1910.119(f)(4), PSG employees are required to complete all required documentation for any permit-required activities.

Hot work permits and hot work shall not be performed until the hot work permit is obtained from the employer. Contract employees shall not perform hot work until a hot work permit is obtained from host employer. The permit shall document that the fire prevention and protection requirements have been implemented prior to beginning the hot work operations.

In the event PSG 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.

**Management of Change (MOC)**

A Management of Change (MOC) will be used when the change includes all modifications to equipment and instrumentation, procedures, process technology, raw materials, personnel and processing conditions.

• Identify and review the change before implementing the change.

• 'Replacement in kind’ means to replace the component with a component that meets the original equipment manufacturer’s specifications.

**Changes that must be managed:**

• Different materials of construction

• Different OEM specs

• New or different procedures

• New equipment

• Additions or deletions to existing installations

• New or different chemicals

• Changes to facilities

**Reporting Incidents and Near Misses**

PSG employees must immediately report all accidents, injuries and near misses. An incident investigation shall be initiated within 48 hours. Resolutions and corrective actions will be documented.