

PROCESS SAFETY MANAGEMENT

A. PURPOSE

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 our employees and or community to serious hazards.

B. RESPONSIBILITY

Whenever our employees must perform work in and around processes that involve highly hazardous chemicals, they will need to be provided with site specific training so that they can accomplish the desired job tasks without compromising the safety and health of employees at the worksite. Whenever safety performance on the job is not known, this employer will assure that employees have appropriate job skills, knowledge and certifications, to do their job.

All employees must perform their work safely. Considering that our employees often perform very specialized and potentially hazardous tasks such as confined space entry activities and non-routine repair activities it is quite important that these activities be controlled while we are working on or near a covered process.

C. EMERGENCY ACTION PLAN

EAGLE INDUSTRIAL INSTRUMENTATION will develop and implement a job specific emergency action plan which will facilitate the prompt evacuation of employees resulting from an unwanted release of a highly hazardous chemical.

An alarm system will be activated to alert employees when to evacuate and will ensure that employees who are physically impaired will have the necessary support and assistance to get them to the safe zone.

Evacuation/relocation from incidental releases of highly hazardous chemicals in the process area will be addressed and detail the actions employees are to take. If the decision to evacuate the area is made then the emergency action plan will be activated.

D. EMPLOYEE TRAINING

All employees involved with highly hazardous chemicals will be provided training to fully understand the safety and health hazards of the chemicals and processes they work in or around, for the protection of themselves and their

fellow employees. Training requirements will be clearly defined and will describe the important actions and conditions under which the employee will demonstrate competence or knowledge as well as what is acceptable performance. All training will be documented as to date of training and methods to verify retention of material.

E. PROCESS SAFETY INFORMATION

EAGLE INDUSTRIAL INSTRUMENTATION will maintain complete, up to date and accurate written documentation in the form of MSDS sheets on hand for all hazardous materials related to each specific job.

F. OPERATING PROCEDURES AND PRACTICES

Where applicable, operating procedures for designated processes along with known potential fire, explosion and toxic release hazards will be reviewed by operating personnel to ensure that they are accurate and provide practical instructions and details on what steps are to be taken or followed in carrying out the stated procedures. All contractor employees are required to follow employer (operator) safe work practices, during all operations including confined space, lockout/tagout or piping control systems.

Operating instructions for each procedure will include the applicable safety precautions, and appropriate information on safety implications, to include (where required):

- Pressure limits
- Temperature ranges
- Flow rate

G. PROCESS HAZARD ANALYSIS

A PHA will be conducted in an organized and systematic effort to identify and analyze the significance of any potential hazards associated with our work. The information obtained will assist in making decisions for improving safety and reducing the consequences of unwanted releases.

EAGLE INDUSTRIAL INSTRUMENTATION/customer representative responsible for process hazard analysis will be notified immediately. The competent person on the job is the person authorized to halt any process operation where there is danger of chemical release or serious personal injury.

EAGLE INDUSTRIAL INSTRUMENTATION 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.

H. NON-ROUTINE WORK AUTHORIZATIONS

Non-routine work conducted in process areas will be controlled by the supervisor in the area in a consistent manner. The known hazards involving the work that is to be accomplished will be communicated to those doing the work.

All requests to perform non-routine work will be requested through the operator, who will coordinate the authorization permit with the concerned parties and approve the work authorization.

A work authorization permit will reference and coordinate, as applicable, lockout/tagout procedures, line breaking procedures, confined space entry procedures and hot work authorizations as required.

Non-routine work authorization permit. A standardized permit will be developed and used by **EAGLE INDUSTRIAL INSTRUMENTATION**. The permit will detail the requirements to authorize non-routine work at specific job locations.

Before the work is authorized and a permit issued, the completion of the following measures must be taken:

- Specify acceptable work conditions.
- If required, isolate the work area.
- Purging, inerting, flushing, or ventilating the work area as necessary to eliminate or control atmospheric hazards (see confined space instructions).
- Verify that conditions in the work area are acceptable for the duration of the authorized work period.
- Ensure everyone affected by the non-routine work is notified and coordinated with.
- Ensure all affected workers and workers that may affect the non-routine work are notified of the task to be accomplished.
- Ensure that the operator/supervisor signs the work authorization to authorize the work to begin.
- The completed permit shall be made available at the time the work begins, to all authorized workers and their supervisors, by posting it at the work site or by any other equally effective means, so that the workers can confirm that pre-start preparations and authorizations have been completed.
- The duration of the permit may not exceed the time required to complete the assigned task or job identified on the permit.
- The operator/supervisor shall terminate the work authorization and cancel the permit when:

1. The operations covered by the permit are completed.
2. A condition that is not allowed under the permit arises in or near the permitable work area.

The permitting procedure will also provide clear steps to follow once the job is completed in order to provide closure for those that need to know the job is now completed and equipment and operations can be returned to normal.

Canceled permit retention. This employer shall retain each canceled permit for at least 1 year to facilitate the review of the process safety program. Any problems encountered during the work authorization period shall be noted on the pertinent permit so that appropriate revisions to the process safety program can be made.

I. INVESTIGATION OF INCIDENTS AND NEAR MISSES

All Accidents, Incidents and Near Misses must be reported immediately. The investigation will be initiated as promptly as possible, but no more than 48 hours following the incident. The investigation will focus on the process of identifying the underlying causes of incidents and implementing steps to prevent similar events from occurring. The investigation will be conducted to also discover process conditions and work practices that could be determined to lead to other accidents and industrial illnesses. Copies of all accident/incident reports will be reported to operator and documented, then maintained for five (5) years.

J. TRADE SECRETS

Whereas OSHA believes that all relevant information must be provided to people for completion of certain tasks, the employer will protect any trade secret with a confidentiality agreement guaranteeing any disclosure of trade secret information.