

POLICY

E & B Oilfield Services, Inc. has implemented this policy to prevent or minimize the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals, and to ensure no employee is exposed to toxic or hazardous material at levels above the permissible exposure limits.

REFERENCES

- §1910.119 – Process Safety Management of Highly Hazardous Chemicals
- §1910.1200 – Hazard Communication Standard

RESPONSIBILITIES

Employer Responsibilities

- Developing a written plan of action to implement employee participation required by PSM
- Consulting with employees and their representatives on the conduct and development of the process hazard analysis (PHA) and on the development of the other elements of process management
- Training each employee presently involved in operating a process or a newly assigned process in an overview of the process and in its operating procedures
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing process hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness
- Teach employees about the hazards of their jobs, specifically any: potential fire, explosions, or toxic release

Safety Committee Responsibilities

- Assist in process hazard analyses as necessary
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

- Assist in process hazard analyses
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

Employees will be told that the purpose of PSM is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals in various industries such as refineries, etc. Each employee will be trained in the overview of the process and its operating procedures for every process they are involved in or newly assigned to. The training will emphasize the process's specific safety and health hazards, emergency operations, shutdown, and other applicable safe work practices.

E & B Oilfield Services, Inc. will document the identity of the employee (permanent or contract), the date of training, and the means used to verify that the employee understood the training.

Hazard communication will cover known workplace hazards, including how to avoid and abate them. E & B Oilfield Services, Inc. employees are required to abide by all company safety policies, procedures, and their supervisor's instruction. Contract employees must be advised of all hazards to which they may be exposed in the workplace.

Employees involved in operating a process and maintenance 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.

PROCEDURES

Process safety information

Danny Abegglen will compile all written process safety information before conducting any PHA. The compilation should be completed under the same schedule required for the PHA. The PHA will include information on: the hazards of the chemicals used or produced by the process; the technology of the process; the equipment in the process.

Safety Data Sheets (SDS) meeting the Hazard Communication Standard requirements may be used to comply with information on the hazards requirement to the extent they contain the required information.

Process hazard analysis

Prior to starting work, Danny Abegglen, or a designated alternative/team, will perform a job hazard assessment (PHA) of the worksite. Immediately upon completion of the hazard assessment, Danny Abegglen will make their customer, employer, or owner of the host facility / jobsite aware of any hazards identified and unique hazards presented by work being performed by Danny Abegglen.

The PHA will focus on equipment, instrumentation, utilities, human actions (routine and non-routine), and external factors that might impact the process. The PHA team will determine and document the priority order for conducting PHAs that includes such considerations as the extent of the process hazards, the number of potentially affected employees, the age of the process, and the operating history of the process.

Standard operating practices (SOPs)

Operating procedures describe tasks to be performed, data to be recorded, operating conditions to be maintained, samples to be collected, and safety and health precautions to be taken. The procedures will be accurate, understandable to employees, and revised periodically to ensure that they reflect current operations. Danny Abegglen will use the process safety information package as a resource to better ensure that the operating procedures and practices are consistent with the known hazards of the chemicals in the process and that the operating parameters are accurate.

SOPs will be written so that an experienced operator not familiar with a particular process unit could run the unit with minimal supervision or help from other operators, or the least experienced operator released for unsupervised work could run the unit.

E & B Oilfield Services, Inc. employees will abide by employers safety work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.

Pre-start-up safety review

The initial start-up procedures and normal operating procedures need to be fully evaluated by Danny Abegglen and the work team as part of the pre-start-up review to ensure a safe transfer into the normal operating mode for meeting the process parameters. Piping and instrument diagrams (PandiDs) are to be completed along with having the operating procedures in place and the operating staff trained to run the process before start-up. Any incident investigation recommendations, compliance audits, or PHA recommendations need to be reviewed as well to see what impacts they may have on the process before beginning the start-up.

Mechanical integrity program

Danny Abegglen will establish and implement written procedures to maintain the ongoing integrity of process equipment. Elements of a mechanical integrity program include the identification and categorization of equipment and instrumentation, inspections and tests, testing and inspection frequencies, development of maintenance procedures, training of maintenance personnel, the establishment of criteria for acceptable test results, documentation of test and inspection results, and documentation of manufacturer recommendations as to meantime to failure for equipment and instrumentation.

Hot work permit

A permit must be issued by Danny Abegglen for hot work operations conducted on or near a covered process. The permit must document that the fire prevention and protection rules for welding, cutting, and brazing have been implemented before beginning. It must also indicate the authorized dates and identify the object to be worked on.

Management of change

Danny Abegglen will prepare written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, equipment, operating procedures, and facilities that affect a covered process. Changes in documents, such as P and IDs, raw materials, operating procedures, mechanical integrity programs, electrical classifications, etc., need to be noted so that these revisions can be changes need to be kept in an accessible location to ensure that design changes are available to operating made permanent when the drawings and procedure manuals are updated. Copies of process personnel as well as to PHA team members when a PHA is being done or one is being updated.

Incident investigation

Incident investigation is the process of identifying the underlying causes of incidents and implementing steps to prevent similar events from occurring. The intent of an incident investigation is for employers to learn from past experiences and thus avoid repeating past mistakes. The incidents for which OSHA expects employers to become aware and to investigate are the types of that result in or could reasonably have resulted in a catastrophic release. Some of the events are sometimes referred to as “near misses,” meaning that a §1910.119 – consequence did not occur but could have.

All workers are required to report incidents and near misses to their supervisors. All incidents and near misses will also be immediately reported to the host employer.

Incidents which have resulted in, or could reasonably have resulted in a catastrophic release of highly hazardous chemical in the workplace shall be investigated within 48 hours of the incident.

Emergency planning and response

Address what actions employees are to take when there is an unwanted release of highly hazardous chemicals. Danny Abegglen will select how many different emergency preparedness procedures or lines of defense are needed and then develop the necessary plans and procedures, appropriately train employees in their emergency duties and responsibilities, and then implement these lines of defense.

COMPLIANCE AUDIT

Danny Abegglen or an assembled trained team of people will audit the PSM system and program. A small process or plant may need only one knowledgeable person to conduct an audit. The audit is to include an evaluation of the design and effectiveness of the PSM system and a field inspection of the safety and health conditions and practices to verify that the employer's systems are effectively implemented. The audit should be conducted or lead by a person knowledgeable in audit techniques and impartial toward the facility or area being audited. The essential elements of an audit program include planning, staffing, conducting the audit, evaluation and corrective action, follow-up, and documentation.

TRADE SECRETS

E & B Oilfield Services, Inc. employees are instructed in the confidentiality of trade secret information, and the disciplinary action which will be a consequence of violation of confidentiality.

CONTRACTORS

When E & B Oilfield Services, Inc. is the contractor:

- E & B Oilfield Services, Inc. employees will abide by employers safety work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.
- E & B Oilfield Services, Inc. employees will not perform hot work until a hot work permit is obtained from E & B Oilfield Services, Inc.'s employer and/or the owner of the host facility / jobsite. The permit will document that provisions of §1910.252(a) have been met.
- E & B Oilfield Services, Inc. will respect the confidentiality of trade secret information when the process safety information is released to them.
- E & B Oilfield Services, Inc. will tell the employer of any hazards it found or created in the course of the work.

E & B Oilfield Services, Inc. will develop a written procedure for managing contractors that perform maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. Such procedures will not apply to contractors providing incidental services that do not influence process safety, such as janitorial, food and drink, laundry, delivery, or other supply services. Ensure that each contract employee is trained in the work practices necessary to safely perform his or her job

Danny Abegglen will ensure 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.

