



<b>NC Sturgeon</b> Safety Management System			Doc No:	PSM
			Initial Issue Date:	02/2016
<b>PROCESS SAFETY MANAGEMENT</b> <b>CONTRACTOR RESPONSIBILITIES (PSM)</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 1 of 2

The purpose of Process Safety Management is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries.

**NC Sturgeon** is required to recognize and participate as a contract employer at client locations with PSM Programs in place. **NC Sturgeon** as a contractor has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows:

- **NC Sturgeon** shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.
- **NC Sturgeon** 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.
- **NC Sturgeon** shall document that each contract employee has received and understood the training required by this paragraph. **NC Sturgeon** 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.
- **NC Sturgeon** shall assure that each contract employee follows the safety rules of the facility including the safe work practices required with 1910.119(f)(4).
- **NC Sturgeon** shall advise the employer of any unique hazards presented by **NC Sturgeon's** work, or of any hazards found by **NC Sturgeon's** work.
- **NC Sturgeon** will assure that trade secret information will be kept in confidence as process safety information is released to them.

**Process Safety Information**

**NC Sturgeon** employees shall participate in all as directed client PSM requirements, including:

- |                                    |                                  |
|------------------------------------|----------------------------------|
| • Employee Participation;          | Process Safety Information (PSI) |
| • Process Hazards Analysis (PHA)   | Operating Procedures             |
| • Training                         | Contractors                      |
| • Pre-Startup Safety Review (PSSR) | Mechanical Integrity             |
| • Hot Work Permits                 | Management of Change (MOC)       |
| • Incident Investigation           | Emergency Planning and Response  |
| • Compliance Audits                | Trade Secrets                    |

**NC Sturgeon Duties**

**NC Sturgeon**, as a contract employer shall ensure its employees abide by employers safe work practices during operations such as lockout/tagout; confined space entry; opening process equipment or piping; hot work; and control over entrance into a facility. These safe work practices shall apply to client employees and contractor employees. To comply with 1910.119(f)(4) **NC Sturgeon** employees are required to complete all required documentation for any permit-required activities.

**NC Sturgeon** shall not perform hot work until a hot work permit is obtained from the client. The permit shall document that the fire prevention and protection requirements (CFR 1910.252(a)) have been implemented prior to beginning the hot work operations.



<b>NC Sturgeon</b> Safety Management System			Doc No:	PSM
			Initial Issue Date	02/2016
<b>PROCESS SAFETY MANAGEMENT</b> <b>CONTRACTOR RESPONSIBILITIES (PSM)</b>			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 2 of 2

**NC Sturgeon** employees must immediately report all accidents, injuries and near misses. An incident investigation shall be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained 5 years.

In the event **NC Sturgeon** 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.