	Southern Heat Exchanger Services Safety Program	Section:	1
		Initial Issue Date	3/11/09
PROCESS SAFETY MANAGEMENT/CONTRACTOR RESPONSIBILITIES- (PSM)		Revision Date:	Initial Version
		Revision No.	0
		Page:	Page 1 of 2

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 employees and others to serious hazards.

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


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

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

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|------------------------------------|----------------------------------|
| • 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 |

SHECO Services, as a contract employer shall follow safe work practices established by the employer. The client shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; hot work; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to client employees and contractor employees. To comply with 1910.119(f)(4) SHECO Services employees are required to complete all required documentation for any permit-required activities.

SHECO Services employees are required to report all incidents to their immediate supervisors as quickly as possible. In the event of a catastrophic release or an incident with the potential to create a catastrophic release of highly hazardous chemicals in the work place, an incident investigation shall be initiated as promptly as possible,

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		Page:	Page 2 of 2

but no later than 48 hours.

In the event SHECO Services 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.