

Midland Engineering Co., Inc. Safety Management System			Doc No:	PSMCONTR
			Initial Issue Date:	12/14/15
Chapter 30-PSM-Contractor Responsibilities			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 1 of 6

PURPOSE

The purpose of this plan is to maintain and improve the safety and health skills of the company's employees to safely perform their job on or adjacent to processes covered under OSHA 29 CFR 1910.119. (reference Occupational Safety and Health Administration Standard 29 CFR 1910.119(h)(m).

SCOPE

This procedure applies to all operations within Midland Engineering Co., Inc.

The company's primary responsibility is to assure that all employees are trained in the work practices necessary to safely perform their jobs. Through this training, the company has assured that each employee is instructed in the potential fire, explosion, and toxic release hazards related to their job. Moreover, the employee understands the relationship between his activities and those of the plant and of his responsibility to follow the emergency response plans within the facility.

All company employees must follow the safety rules of the facility which includes specific safe work practices used by the facility and permits used to control the work.

The company employees are to notify facility personnel of any unique hazards associated with the company process and any other hazards, whether caused by the company activities or the activities of others, found while on the facility property.

RESPONSIBILITY

Managers shall ensure employees are appropriately trained prior to work assignment. Furthermore, it is the responsibility of regional management to coordinate compliance requirements with the customer and to assign responsibilities for implementing this procedure.

Supervisors are responsible to ensure that employees follow all procedures applicable to their job site, and to inform employees of special concerns related to specific job sites.

Employees are responsible for following the required safety rules, methods and procedures whenever they are working on, or adjacent to, processes of highly hazardous materials. Employees should also report any accidents, injuries, or near misses to their supervisor within 48 hours. Resolutions and corrective actions must be documented and maintained for no less than 5 years.

All subcontractors performing work for Midland Engineering Co., Inc. Service shall comply with this policy.

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Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 2 of 6

PROCEDURE

These procedures are designed to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries.

Process Awareness

The company's customers will normally provide employees a site specific process overview and related process hazard information to assure safe performance of tasks. It is the supervisor's responsibility to ensure this information has been received by all employees on the job site.

Process Overview

The process overview must consist of:

1. Block flow diagrams or simplified process flow diagrams.
2. Chemistry of the processes.
3. Operating temperatures, pressures, flows, and composition.

Confidentiality

All Midland Engineering Co., Inc. Service employees must respect the confidentiality of trade secret information when the process safety information is released to them. Midland Engineering Co., Inc. Service employees and subcontractors shall be instructed to treat all information concerning a customer's processes as CONFIDENTIAL. Except in the normal course of company operations, information concerning these processes shall not be discussed, photographed, or characterized without written approval of the customer.

Process Hazards

The related process hazards information shall consist of hazards of the processes and the chemicals in the processes. The information must consist of at least the following:

1. Toxicity information
2. PEL's - Permissible Exposure Limits
3. Physical data
4. Reactivity data
5. Corrosivity data
6. Thermal and chemical stability

Safety Note: MSDS - Material Safety Data Sheets may be used for the information required.

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Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 3 of 6

Training Resources

The information needed for the Process Awareness Training should be provided by the customer. The training shall be conducted by the company, local safety councils, and/or the customer as per agreement for each job site.

Other Additional Site Specifics

1. Process area entry permit procedures.
2. Process safety information - chemical processes, equipment and hazards control.
3. Emergency Response and Evacuation Plan.

Safety Note: Whenever an unsafe condition is observed by the company personnel, that condition shall be immediately reported to the company Supervisor and the Facility/Customer Contact.

Permits

The permits listed below are the typical permits the company crews commonly encounter. A general explanation is given for each permit.

Work Permit - Is issued by the customer before any work can begin. In some facilities the work permit can be used to enter a specific area to perform work, while at other facilities a separate entry permit is required. The foreman should always carefully read the work permit to ensure the scope of work to be accomplished and the areas to be entered are adequately described on the permit. Any restrictions shall be noted and discussed with the crew before work begins. Time restraints or re-issue requirements described on the permit shall be strictly followed.

Entry Permit - Is issued by the customer whenever an entry into some designated area is required. This area may be tank or vessel areas or in some instances may include the tank or vessel itself. The foreman should always carefully review the entry permit to ensure the specific areas to be entered are described and that all entry conditions are met prior to entry. Any time restraints or re-issue requirements described on the permit shall be strictly followed.

Confined Space Permit - Is issued by the customer whenever entry into a designated permit-required confined space is required. A confined space permit may be required in addition to any work or entry permits. The foreman should always carefully review the entry permit to ensure the specific areas to be entered are described and that all acceptable entry conditions are met prior to entry. Any time restraints or re-issue requirements described on the permit shall be strictly followed.

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			Next Review Date:	
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 4 of 6

Hot-Work Permit - Is issued by the customer whenever cutting, welding, or other spark or flame producing work is required. The use of electrically powered tools such as drills and saws may also require a hot-work permit. Midland Engineering Co., Inc. Service employees shall not perform hot work until a hot work permit is obtained from employer. The foreman should always carefully review the permit when it is issued to ensure that the work to be accomplished and the areas where the work will be conducted are adequately described. Any limitations and necessary fire prevention and protection requirements should be listed on the permit should be noted and discussed with the crew before hot-work begins. The hot-work permit must include the entire tank or vessel and all appurtenances.

Scaffold Permits - a scaffold permit or scaffold inspection conducted by the customer's safety department or a customer designated competent person is required before the scaffold can be used. The foreman shall ensure only appropriately assembled and inspected scaffolds are used.

Acceptable Conditions

Many permits list conditions that must be met before the permit can be used. These conditions may address: types of personal protective equipment; acceptable entry conditions; area and personal monitoring; effective work hours; hole-watch/fire watch requirements; fire prevention/protection requirements; etc. It is the responsibility of the supervisor to review these conditions, to notify the crew of the requirements, and to ensure the conditions are met at all times.

Resolving Permit Problems

There are usually only two causes of permit problems:

1. We have not read and understood the permit, and/or we failed to discuss the requirements of the permit with the crew and ensure they understand it, or;
2. The permit is too restrictive to allow us to efficiently and effectively complete the job.

The first cause is easily resolved. It is the responsibility of the supervisor to review the permit when it is issued. If there is anything that is not understood or if any element of the permit is unclear, those issues should be resolved on-the-spot with the person issuing the permit. It is also the responsibility of the supervisor to review all permit requirements with the crew before work begins.

The second cause may not be as easy to resolve. If the permit is too restrictive, the supervisor should attempt to explain the company practices and have the permit modified. Be careful to never argue with the permit writer. Notify the company management and explain the restrictions and how they will impact job performance.

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Safety Note: Never violate the requirement of a permit!

Safe work Practices:

The employer 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; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees.

Effect of the company Procedures

It shall be the responsibility of the supervisor to provide the customer with information concerning the effect and impact of the company procedures on the customer's processes.

This information shall include any inherent hazards associated with those procedures.

Training and Documentation

Records which contain the identity of the contract employee, the date of training & the means used to verify that the employee understood the training must be maintained. All employees completing PSM Training must sign the Training Record Form. A copy of this record shall be forwarded to the Corporate Controller or the Training Records Administrator at the company Corporate Headquarters.

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Midland Engineering Co., Inc.	PROCESS SAFETY MANAGEMENT TRAINING RECORD		
EMPLOYEE NAME:	SSN:	DATE:	
<p><u>Process Safety Management (PSM – OSHA Standard 29 CFR 1910.119)</u></p> <p>Midland Engineering Co., Inc.'s primary responsibility is to assure that all employees are trained in the work practices necessary to safely perform their jobs. Through this training, the company has assured that each employee is instructed in the potential fire, explosion, and toxic release hazards related to their job. Moreover, the employee understands the relationship between his activities and those of the plant and of his responsibility to follow the emergency response plans within the facility.</p> <p>All employees must follow the safety rules of the facility which includes specific safe work practices used by the facility and permits used to control the work.</p> <p>This training has instructed employees to notify facility personnel of any unique hazards associated with company processes and any other hazards, whether caused by company activities or the activities of others, found while on the facility property.</p>			
<p>** I HAVE READ AND UNDERSTAND THE REQUIREMENTS AS SET FORTH UNDER THE PROCESS SAFETY MANAGEMENT STANDARD AND HAVE RECEIVED PROCESS SAFETY MANAGEMENT TRAINING IN ACCORDANCE WITH THE FURMANITE SAFETY TRAINING PROGRAM.</p>			
_____ EMPLOYEE'S SIGNATURE		_____ INSTRUCTOR'S SIGNATURE	