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I. PURPOSE

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

Gallant Builders LLC is required to recognize and participate as a contract employer at client locations with PSM Programs in place. Gallant as a contractor has certain obligations to fulfill in order to comply with established PSM programs.

II. SCOPE

These PSM requirements apply in its entirety to all Gallant Builders (Gallant) projects unless a variance is granted by the Gallant Safety Director.

III. RESPONSIBILITIES

Gallant and Subcontractor employer responsibilities are as follows:

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

IV. PROCESS SAFETY INFORMATION

All project 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

V. GALLANT BUILDERS' DUTIES

Gallant shall ensure all subcontractor's employees abide by 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) all employees are required to complete all required documentation for any permit-required activities.

Subcontractors 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.

Gallant 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.