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Approver: Joe Berry

### Berry Bros. General Contractors, Inc. Corporate Policy Procedure

(HSE) Health, Safety & Environmental Policies and Procedures Manual

Section	#	62
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Doc # HRP - 62

Revision: 2

### PROCESS SAFETY MANAGEMENT (PSM)

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### **SUBPART A - PURPOSE / SCOPE**

It is the purpose and intent of Berry Bros. in its quest to serve all segments of the petroleum industry and its related constituents, to provide top quality services at fair market prices and to do it all in a fashion that is safe for all involved personnel and friendly to our environment. It is our further purpose to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals, etc.

All Berry Bros. personnel shall be required to comply with OSHA's Process Safety Management of Highly Hazardous Chemicals (29 CFR 1910.119).

### **SUBPART B - GENERAL REGULATIONS**

The program involves the development, implementation, and maintenance of the following elements:

- A program to ensure employee participation.
- Process safety information.
- Process hazard analysis.
- Operating procedures and protocol.
- A training program.
- Pre-start-up safety reviews when process changes are instituted.
- A program to ensure the mechanical integrity of the equipment.
- Safe work practices including hot work, confined space entry, etc.



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- A program to manage change in process chemicals, technology, equipment and procedures.
- Incident Investigation.
- Emergency planning and response.
- A compliance-auditing program.
- Trade secrets.
- Operator classifications.

#### **SUBPART C - IMPLEMENTATION**

Berry Bros. shall insure that contract as well as company employees will be trained in the work practices necessary to perform his or her job. They shall also be instructed in the known potential fire, explosion, or toxic release hazards related to his or her job and the process and applicable provisions of the emergency action plan.

Berry Bros. shall document that each employee has received and understood the required training. A record, which contains the identity of the contract employee, the date of the training and the means, used to verify that the employee understood the training.

Material Safety Data Sheets are used to address the process safety information in detail. (Specific Hazard Assessments)

# SUBPART D - SAFE WORK PRACTICES AND OPERATING PROCEDURES

Employees shall abide by Berry Bros.'s safety work practices during operations such as Lockout / Tagout, Confined Space Entry, Opening any process equipment or piping and controls over systems at the facility. Berry Bros. shall advise the employee of any unique hazards or any hazards that may be presented in a given job situation. Any required permits such as a "Hot Work" permit shall be obtained by the Berry Bros.'s person-in-charge (PIC) and shall meet the provisions set forth in CFR 1910.252(a) of the OSHA standards.



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### **SUBPART E- CONTRACT EMPLOYEES**

Any contract employer shall assure that each contract employee is instructed in the known potential fire, explosion or toxic release hazards related to his or her job and the process and the applicable provisions of the emergency action plan.

Contract employers shall document that each employee has received and understood the required training. The contract employer 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.

Contractor employees shall 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.

The Contract employer shall advise the employer of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.

### **SUBPART F - INCIDENT INVESTIGATIONS**

All employees must immediately report all accidents, injuries and near misses. An incident investigation must be initiated within twenty-four (24) hours. Resolutions and corrective actions must be documented and maintained in the company archives for a minimum period of five (5) years.

### SUBPART G - TRADE SECRETS

All Berry Bros. employees must respect the confidentiality of a trade secret or process information when the information is released to them.



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