

	<b>PROCESS SAFETY MANAGEMENT (PSM) OVERVIEW PROGRAM</b>	Document No.:	HSE-OP-036
		Department:	Operations
		Revision Date:	07 APR 2010
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## Purpose

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It is the intention of Trinity Medical Management (“Trinity”) to provide a safe and healthy work environment for not only its employees but also contracted labor. The purpose of this program is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries, etc. More than ever before contractors are being asked to work in areas and in situations in which negligence and ignorance of a system process and its potentially harmful effects can cause major damage to human health, environment, significant property damage, and large monetary losses.

It is the belief of Trinity that proper planning, training, and equipment usage can minimize worker risk for accident, injury and environmental damage. In this regard, Trinity has developed this Process Safety Management Overview Program.

## Administration

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The Training and Compliance Manager has overall responsibility for coordinating safety and health programs in this company. He/She is the person having overall responsibility for the Process Safety Management Overview Program. The TCM will review and update the program, as necessary.

Copies of the written program may be obtained from the Operations office.

## What is Process Safety Management?

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Process Safety Management is the process of planning for safe work conditions on a job site or for normal working operations. It consists of training requirements, information sharing, and overall workplace awareness. It is contingency plan for what to do if something fails. It is a plan to prevent failure. But moreover it is plan for safe work conditions.


## Trinity's Process Safety Policy

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Because of the various disciplines that Trinity participates in and the ever-changing job site locations and potentially hazardous materials that Trinity personnel can come in contact with or be forced to work around it is not feasible to provide a fully encompassing program that would address every feasible scenario.

Potentially dangerous substances that Trinity personnel or subcontracted workers may be exposed to are flammables, explosives, acids, caustics, & toxins.

Potentially dangerous scenarios that Trinity personnel or subcontracted workers may be exposed to are slip, trip, and fall hazards, heat exposure, cold exposure, hazardous atmospheres, confined space entry, and heavy machinery.

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Also it is especially important for all Trinity's employees to understand, (especially new employees) that Trinity's work is not conducted at just one local, but is instead done at various facilities and for various customers. Trinity's services may be required at industries, pipelines, truck terminals, schools, commercial or residential buildings, city offices, etc. No one project and no one situation is the same as the other. Therefore every project must be treated as its own special PSM program.

Trinity will assure that each of its employees 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 company's emergency action plan.

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

Trinity has provided the following outline for a development of job-specific PSM program. This program is to be followed by all Trinity personnel and Trinity contracted workers on site. The development of the program is the responsibility of the Trinity project manager for that specific project. Documentation of the project's PSM plan must be kept by the Trinity project manager on-site during all work activities and made available for review to Trinity employees and contract labor when asked for at a reasonable time a place. However, all personnel must review it, and documentation of the review must be kept as well by the project manager.

Certain job sites may have a PSM program in effect. In this event Trinity personnel and Trinity contract labor must review the already established facility PSM program and be absorbed into the process. If the service that Trinity is providing is not addressed in the established PSM program then it will be the responsibility of the Trinity project manager to make addendum's to the established PSM program that encompass the described activity.


### **Trinity Process Safety Management Outline**

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Since Trinity's job sites and job types are of such a tremendous variety Trinity has established this outline to be followed for the development of a site-specific PSM program. This outline is to serve a checklist for items to be addressed in the program development.

These programs may also be referred to as Site Safety & Health Plans, Work Plans & Contingency Plans.

1. Insure that all Trinity personnel and all Trinity subcontractors have the necessary local, state, or federal licensure for conducting this activity. Insure that the Trinity project manager has documentation of this training. For example when conducting asbestos abatement projects all personnel involved in the preparation, removal, packaging, and disposal of the asbestos material must have the proper state or federal training for that activity. A copy of the original certification should be obtained prior that persons or companies involvement on the project.
2. Insure that all Trinity personnel and all Trinity subcontractors have the necessary safety & environmental training for performing the role they are to play on this particular project.

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The Company will 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. Insure that the Trinity project manager has documentation of such training. The training documentation should be in the form of a certificate or a training class sign-in sheet. The documentation must be verifiable, with the name of the employee(s) trained, a date, telephone number and/or address for training provider. Training comprehension will be verified with utilizing a verbal and/or written exam.


3. Trinity employees will abide by our employers safety work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.
4. Narrative of the hazards that may be present on the specific job site. For example the dangers of asbestos inhalation & flammable atmospheres. The potential for product loss from fuel storage system and the potential damage to the environment. The Company will advise the employer of any unique hazards presented by the Company's work, or of any hazards found by the Company's work.
5. Written work plan for how the particular project is to proceed. Start to finish, line-by-line work plan for how the project is to unfold. This workplan when possible should specify which employees will be performing certain tasks, and their responsibilities. It shall discuss safe work practice standards for the project, i.e. air monitoring, tooling and equipment, PPE, permitting, etc. It should also entail or reference other Trinity programs that apply. Such as Lockout Tagout and Confined Space Entry.
6. When working with or around chemicals, MSDS forms should be obtained and kept with the site-specific program for review prior to the inception of work and in the event of an accident. The information that should be present on these MSDS forms should discuss proper procedure for handling, spill or release control, and potentially harmful conditions. It is necessary that this information be made available to all personnel for review to provide a safe working environment. Not only should these forms be kept with the on-site PSM program but they should also be in easily accessible areas in case of emergency. When possible the Trinity project manager should use the MSDS sheet specific to the manufacturer of that substance i.e. Mobile 1 Hydraulic Fluid A Patent #1234. However, at a minimum these.

MSDS forms should be of the general type for that substance.

### **Trinity Contract Labor Policy**

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Contract labor is of large concern in the areas in which Trinity does business. The failure of a subcontracted excavator operator or welder, for example, to fully understand the magnitude of their responsibility and the potential for safety or environmental damage due to ignorance or negligence is enormous. Therefore it is of extreme importance that these contractors be educated as to the job site PSM program. Their involvement will be limited to their training and education of the job conditions that they have been contracted to perform. Proof of contractor's employee training must be presented upon request to the Trinity on-site supervisor.

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Trinity personnel should monitor the work conditions of contract labor to insure safe work conditions. If potentially dangerous situations or work conditions are noted by Trinity employees or contract labor personnel, Trinity employees should immediately instruct contract personnel as to the correct manner to perform their work and follow this up with a report to Trinity's on-site supervisor. The on-site supervisor should follow-up this instruction and note date and time of instruction for job records. This warning should be kept in the contractor/vendor file along with the contractor's certificate of insurance.

## Hot Works Permits

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When conducting welding, torching, or any work that produces a spark Trinity employees should utilize a hot works permit. Trinity employees will not perform hot work until a hot work permit is obtained from employer.

This permit should include:

- the reason for work
- description of work
- tools to be used
- personnel including fire watch
- how long fire watch will take place
- extinguishing media to be used
- duration of work

## Trade Secrets

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Trinity performs specialized work activities. Many of these activities while not the least secretive the process by which Trinity accomplishes these tasks may be. Contractors and employees should understand and sign off on forms understanding that information they obtain during the job and on the job is considered classified. Their disclosure of information that could be detrimental to company business will open them and their company up to lawsuits.

Trinity performs work at several locations where Trinity employees or sub-contractors may become familiar with client process and ingredients. Many of these locations will require that a legally binding document be entered into so that all parties understand that location work, process, and ingredients are secretive and are not to be disclosed and any disclosure of such items considered trade secrets allow for legal intervention.

## Accident Investigation

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It is important for legal and physical reasons for any worker on a Trinity job-site to report unsafe conditions to their supervisor immediately upon discovery to prevent serious accident.

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It is important for legal and physical reasons for any worker on a Trinity job-site to report any accident that may occur to their supervisor immediately upon discovery or at least within 48 hours.

If the accident is a threat to the environment immediate notification will prevent widespread damage to the environment when control and cleanup measures can be implemented in an expedient fashion. Furthermore, quick notification of accidental spills into the environment will allow for Trinity, Trinity's clients, or sub-contractors to comply with regulatory notification if spill amounts are in excess of the RQ.

If the accident is of the physical nature then quick notification will allow for quick medical attention if needed. If employee or worker refuses medical attention then this should be noted as well as the time of notification for insurance and reporting purposes.

Resolutions and corrective actions must be documented and maintained five (5) years.

