

Contractor and Owner Safety Program Implementation

API RECOMMENDED PRACTICE 2221
THIRD EDITION, OCTOBER 2011



AMERICAN PETROLEUM INSTITUTE

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Downstream Segment

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Foreword

This guide is intended to assist refining and petrochemical industry facility owners and contractors to implement or improve an effective contractor safety and health program. This guide supplements the American Petroleum Institute's (API) Standard 2220 *Improving Owner and Contractor Safety Performance*. These two documents identify elements of contractor safety and health programs, and provide guidance and examples to refinery and petrochemical plant owners for designing and implementing effective programs. Contractors can also benefit from understanding the owner's program and by establishing a complementary program of their own.

A number of annexes are included in this document as samples of approaches used at some facilities or as supplemental information. Except where indicated in the text, these annexes are informative; implementation of informative annexes is not required for a program to be in conformance with these guidelines.

This information is provided to help owners of (and contractors working at) refinery and petrochemical facilities to understand the process of managing contractor safety and health programs. Neither API nor this document can replace the necessary professional judgment needed to recommend the specific strategy to apply. This information should be applied as necessary to reflect the needs of the owner, facility or particular activity. Each user shall analyze the particular situation, apply the information in this document to the situation as applicable and necessary, and obtain appropriate technical and legal assistance. This manual is not designed or intended to create legal rights or obligations. All employers (owners and contractors) are expected to comply with federal, state and local laws and regulations, and should consult legal counsel concerning such matters.

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Should: As used in a standard, "should" denotes a recommendation or that which is advised but not required in order to conform to the specification.

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Suggested revisions are invited and should be submitted to the Standards Department, API, 1220 L Street, NW, Washington, DC 20005, standards@api.org.

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Contractor and Owner Safety Program Implementation

1 Scope

Many facilities in the refining and petrochemical processing industries employ contractor personnel for a wide range of activities, from administrative support to equipment repair, maintenance, and construction. Contractor activities that involve work in or around process equipment can have an increased potential to place both contractor personnel and owner personnel at risk.

This guide is intended to assist refining and petrochemical industry facility owners and contractors to implement (or improve) an effective contractor health and safety program. In the petroleum segment, API 2221 applies to downstream activities only. This includes refineries, pipelines and marketing and distribution terminals, but not exploration and production or marine. This document provides guidance for applying the principles outlined in API RP 2220, *Improving Owner and Contractor Safety Performance*. Security issues maintain a high profile in all aspects of industry, including the contractor screening and selection process; however, security is outside the scope of this standard and is mentioned as a reminder of the need for many facilities to include security in their contractor processes.

1.1 General

This publication intends to preserve the independent contractor relationship while helping both owners and contractors improve contractor safety performance. It is based on experience in the petroleum and petrochemical industries and experience of firms that perform contract work for these industries. Since owner facilities, equipment, sites and contracted work are diverse, this publication may not be applicable to operations at all facilities or to all contract work performed in these operations. This publication may not apply to contractors working in low risk environments that generally do not affect facility safety, such as those that provide incidental or supplementary services such as janitorial, beverage or laundry.

1.1.1 Owner Commitment to Improved Contractor Safety Performance

The owners' commitment and continued support of a health and safety process are the essential elements of all successful contractor safety programs. Effective contractor safety programs require owners to focus resources on safety and to maintain processes to review how contractor safety is being managed. To emphasize their commitment, many owners incorporate the need for contractor safety in senior management safety, health and environmental policy statements.

1.1.2 Contractor Commitment to Improved Safety Performance

The success of contractor safety initiatives requires commitment from the contractor as an employer in addition to the commitment of facility owners. Owners should encourage contractor management commitment by sharing information regarding the success of effective health and safety performance as cost-effective "good business."

1.2 Purpose

The purpose of this publication is to assist owners and contractors to improve their safety programs. Joint commitment and support of safety program initiatives are essential in minimizing incidents and preventing injuries and illnesses. The nature of the work performed by contractors within the petroleum and chemical industries varies greatly. Some contractors perform construction and turnaround activities; other specialty contractors provide skills and services that are not typically found within an owner's work force. Other contractors may provide services to augment the peak loads and skills of owners' work forces, such as in maintenance and operation of facilities. These diverse functions and uses of contractors share a common need for effective safety programs to protect owner and contractor personnel from workplace injuries, illnesses and losses associated with incidents arising out of contractor work.

This publication originated with an API task force comprised of representatives of owner companies and contracting firms involved in downstream operations including refining, petrochemical, pipeline, wholesale marketing and distribution. Application of any section of this publication by management should take into account the type of work, the level of risk, and safety performance expectations of the contractor personnel.

1.3 Benefits of a Contractor Health and Safety Program

Owners and contractors benefit when they work together to enhance the management of contractor related health and safety programs. These benefits include, but are not limited to:

- improved health and safety performance;
- better working relationship between owner and contractor;
- improved health and safety training for both owner and contractor personnel;
- improved quality and productivity; and
- improved plant and equipment reliability.

Improved quality and productivity are inherent benefits because a comprehensive contractor safety program requires that workers be properly trained for their job tasks and be familiar with their job requirements. Fewer incidents result in reduced regulatory inspections and provide for better control of project costs. The potential for damage to the owner's facility and the contractor's equipment is also reduced, thus improving productivity and reliability.

1.4 Concept of Hazard versus Risk

Hazards are conditions or properties of materials with the inherent ability to cause harm. Risk involves the potential for exposure to hazards that may result in harm or damage. For example, a hot surface or material can cause thermal skin burns or a corrosive acid can cause chemical skin burns, but these injuries can occur only if there is contact exposure to skin. A person working at an elevated height has "stored energy" and a fall from a height can cause injury, but there is no risk unless a person is working at heights and is thus exposed to the hazard. There is no risk when there is no potential for exposure.

Determining the level of risk for any activity involves understanding hazards and estimating the probability and severity of exposure that could lead to harm or damage. While the preceding examples relate hazards to the risk to people, the same principles apply to property risk. For instance, hydrocarbon vapors in a flammable mixture with air can ignite if exposed to a source of ignition resulting in a fire which could cause injury and damage property.

These concepts are significant in order to understand and properly define the categories of potential risk associated with work done by contractors.

1.5 Contractor and Owner Relationship

Contractor health and safety programs are most effective when there is participation by both owners and contractors, each of whom has a distinct role in ensuring the ongoing safety of contractor activities. The contractor and owner relationship is significantly improved by clearly defining roles and responsibilities for both parties, establishing goals, objectives and expectations, and maintaining communication throughout the relationship. This document, supplemented by extensive material in the appendices, provides approaches for implementing those responsibilities.

Contractors frequently use subcontractors, both on large projects and for specialized work. Depending on the nature of the contract, a subcontractor is generally subject to either the owner's or contractor's health and safety requirements (or both). The major difference between a contractor and subcontractor is that a contractor who employs subcontractors assumes the role of "owner" with respect to the subcontractor. The owner and prime

contractor need to discuss and agree on the health and safety program requirements for subcontractors during the pre-award process.

1.6 Relationship to Process Safety Management

OSHA adopted 29 *CFR* 1910.119, *Process Safety Management (PSM) of Highly Hazardous Chemicals* in 1992. Paragraph (h) of the OSHA PSM standard applies to contractors performing maintenance or repair, turnaround, major renovations, or specialty work on or adjacent to a covered process. The OSHA PSM standard applies only to facilities that meet the relevant definitions. The PSM standard does not generally apply to contractors providing incidental services that do not involve or impact on process safety, such as janitorial, laundry and other similar on-site services.

The U.S. EPA also includes a contractor safety paragraph in their Risk Management Plan (RMP) regulation that is similar to the OSHA PSM standard.

This guide is general in nature and is not intended to provide, and does not provide, specific guidance for PSM compliance. However, elements in this guide may be of assistance in developing compliance programs for owners who have contractors working in facilities that are subject to the OSHA PSM or EPA RMP standard.

2 Normative References

The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies. General safety standards appear in Annex N along with a bibliography of historical or useful references.

API/NPRA *Security Vulnerability Assessment Methodology for the Petroleum and Petrochemical Industries*

API Standard 2220, *Improving Owner and Contractor Safety Performance*

API *Security Guidelines for the Petroleum Industry*, Third Edition, April 2005

ASSE ¹/ANSI ² Z490.1, *Criteria for Best Practices in Safety, Health and Environmental Training*

NCCI ³, *ABC's of Revised Experience Rating*

U.S. DOT 49 ⁴, *Code of Federal Regulations (CFR) Parts 190 to 199*

U.S. EPA ⁵, *Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act*, 40 *CFR* Part 68, Section 112(r)(7)

U.S. OSHA ⁶, 29 *CFR* Parts 1910 and 1926

U.S. OSHA 1904, 29 *CFR* 1904, *Occupational Injury and Illness Recording and Reporting Requirements*

U.S. OSHA 1910.119, *Process Safety Management of Highly Hazardous Chemicals*

¹ The American Society of Safety Engineers, 1800 East Oakton Street, Des Plaines, Illinois 60018, www.asse.org.

² American National Standards Institute, 25 West 43rd Street, New York, New York 10036, www.ansi.org.

³ NCCI Holdings, Inc. (formerly National Council on Compensation Insurance), 901 Peninsula Corporate Circle, Boca Raton, Florida 33487, www.ncci.com.

⁴ U.S. Department of Transportation, 400 7th Street, S.W., Washington D.C. 20590, www.dot.gov.

⁵ U.S. Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, www.epa.gov.

⁶ U.S. Department of Labor, Occupational Health and Safety Administration, 200 Constitution Ave. NW, Washington, D.C. 20210, www.osha.gov. OSHA Regulations are posted on and may be downloaded from the OSHA web site, www.osha.gov.

U.S. OSHA 1910.1200, *Hazard Communication*

U.S. OSHA Publ 2254, *Training Requirements in OSHA Standards and Training Guidelines* (1998—Revised)

3 Terms and Definitions

For the purposes of this recommended practice, the following definitions shall apply:

3.1

approved contractor list

A list developed by owners that includes all qualified and approved contractors (and subcontractors).

3.2

contractor

General contractors, self-employed contractors, subcontractors (general or self-employed) working on construction, maintenance and repair, major renovation, turnarounds, or specialty services in or around process equipment, laboratories, pipelines, terminals, utilities, and other petroleum and petrochemical facilities and equipment. For the purposes of the requirements of this standard, the term contractor includes subcontractors, short-term contractors and small contractors.

3.3

covered process unit

A facility that meets the applicability requirements of the OSHA Process Safety Management rule (29 *CFR* 1910.119).

NOTE OSHA PSM specifically exempts oil and gas well drilling and servicing operations and the storage of flammable liquids in atmospheric tanks that are not directly connected to a process unit.

3.4

days-away case rate

The number of injury or illness cases resulting in days away from work for each 200,000 hours worked.

3.5

EMR

Workers Compensation Experience Modification Rate (EMR) is an insurance premium adjustment that anticipates future performance based on past experience. A low EMR (below 1.0) reflects good safety performance.

3.6

general contractor

A general contractor undertakes overall responsibility for the specific work activity. General contractors might use one or more subcontractors to conduct various elements of the overall job.

3.7

hazard

An inherent physical or chemical characteristic (flammability, toxicity, corrosivity, stored chemical, electrical, hydraulic, pressurized or mechanical energy) or condition that has the potential for causing harm or damage to people, property or the environment.

3.8

injury and illness incidence rate

The number of OSHA recordable injuries and illnesses per 200,000 hours worked (the annual exposure base for 100 full-time workers).

3.9**long-term contractor**

Contractors who are on-site for long-term projects. Long-term contractors provide services over an extended period of time in the facility.

3.10**NAICS**

North American Industry Classification System (NAICS) is the replacement for the former Standard Industrial Classification (SIC) system.

3.11**near-miss**

An incident or situation with the potential for injury or property damage that did not occur.

3.12**OSHA**

U.S. Department of Labor Occupational Health and Safety Administration.

3.13**overlay**

Owner or contractor added health and safety requirements that go beyond those required by OSHA or other regulatory agencies.

3.14**owner**

Person or business entity responsible for a facility, including the health and safety requirements (sometimes referred to as host employer).

3.15**PQF**

Pre-qualification Form (see Annex B).

3.16**prime contractor**

The contractor given the contract by the owner to perform work. A contractor may employ subcontractors. See **contractor**.

3.17**PSM**

Process Safety Management (most often based on OSHA regulation 29 *CFR* 1910.119).

3.18**risk**

The probability of exposure to a hazard which could result in harm or damage.

3.19**risk assessment**

The identification and analysis with judgements of probability and consequences, either qualitative or quantitative, of the likelihood and outcome of specific events or scenarios that result in harm or damage.

3.20**risk-based analysis**

A review of potential hazards and needs to eliminate or control such hazards based on a formalized risk assessment.

3.21**SIC Code**

Standard Industrial Classification, now called North American Industry Classification System (NAICS).

3.22**short-term contractor**

A contractor used for short-term highly specialized jobs or jobs of short duration.

3.23**small contractor**

Contractors who employ less than 10 people company-wide, based on local circumstances.

3.24**subcontractor**

Contractor employed by another contractor (usually the prime contractor) who works for an owner. For the purposes of the requirements of this guide, the terms contractor, subcontractor, short-term contractor and small contractor all are “contractors.”

4 Management Overview—Putting it All Together

4.1 General Contractor Safety Management Requirements

Certain requirements shall be in place and implemented in order for a contractor health and safety program to be successful. This section addresses management requirements for owners and contractors in the implementation of a contractor health and safety program. It serves as a summary of the information in this publication and an overview on the development and implementation of contractor safety management requirements.

4.2 General

Owners contribute to improved contractor safety performance through actions that include, but are not limited to the following:

- a) making a deliberate management decision to establish an effective ongoing program that uses specific safety performance criteria for selecting contractors;
- b) developing a management system to ensure that contractor safety performance is consistent with established program elements;
- c) including specific safety language in contracts between owners and contractors;
- d) conducting meetings with prospective contractors before bid submission to address specific contractor safety requirements;
- e) including site-specific health and safety requirements in contractor bid packages;
- f) requesting health and safety information from each prospective contractor and evaluating it during the selection process;
- g) establishing and verifying specific training requirements for contractors;
- h) conducting pre-job meetings that specifically address safety expectations;
- i) requiring formal contractor safety orientations;

- j) auditing and reviewing the health and safety performance of contractors working on the owner's sites;
- k) documenting any deviations from the established safety program and providing feedback to the contractor with the expectation of immediate corrective action, non-recurrence and continuous improvement;
- l) maintaining on-site copies of OSHA injury and illness statistics, or when OSHA statistics are not applicable, other measures of safety performance for all contractors at each location;
- m) using audit findings and safety performance information to evaluate the contractors and to evaluate the management system and program effectiveness; and
- n) taking corrective action to improve the management system and associated programs when deficiencies are noted.

4.3 Management Commitment

Commitment from both owner and contractor management to support the program provides the essential driving force for a successful safety process. Management commitment begins with providing resources (both personnel and monetary) for implementing and maintaining an effective contractor health and safety program. Management commitment is demonstrated through the ongoing support of the program by communicating expectations, visibly participating in Health and Safety activities, measuring progress and making improvements when needed. Success is characterized by effective control and elimination of injuries, illnesses, damages and incidents (including "near-miss" incidents).

4.4 Policy Statement

Management commitment is best expressed in a written policy that establishes the importance of contractor health and safety. The involvement and support of both senior management and line supervisors helps ensure the effectiveness of a contractor health and safety program. A sample facility policy statement on contractor health and safety is shown in Annex A.

4.5 Written Contractor Health and Safety Program

A written program includes, but is not limited to procedures for the elements contained in Figure 1. An example of a facility written contractor health and safety program is shown in Annex K.

4.6 Responsibilities

Responsibilities and accountabilities for both owners and contractors shall be established to support the overall contractor management system.

4.6.1 Owner Responsibilities

4.6.1.1 General

The owner should establish a contractor health and safety program which requires contractors to be as protective of their contract employees as the owner is of its employees. Both the owner's established health and safety program and that of the contractor shall require respect and consideration of the safety of each other's employees. Typical owner elements are shown in Table 1.

Table 1—Possible Assignment of Owner Responsibilities

Tasks to be Assigned to Owner's Personnel	Department Assigned to
General: <ul style="list-style-type: none"> — develop a written contractor health and safety program containing the elements within this guide; — develop and implement a contractor facility orientation program; and — designate a person as focal point for the contractor health and safety program. 	
Contractor Pre-qualification: <ul style="list-style-type: none"> — establish a pre-qualification program that includes the criteria a contractor shall meet; — develop and maintain an approved contractor list; — maintain a file on each approved contractor; and — review the contractor pre-qualification package and determine if health and safety criteria are met. 	
Selection of Contractor: <ul style="list-style-type: none"> — verify the contractor personnel have the required health and safety training and have proven demonstrated skills for jobs for which they shall be assigned; — verify that contractors have a copy of owner's health and safety policies and procedures; — verify that all contracts have clauses that require the contractor to meet all government and owner-specific health and safety policies and standards; and — participate in pre-bid and pre-award meeting. 	
Pre-job Activities: <ul style="list-style-type: none"> — communicate to contractor the overview and hazards associated with the process; — verify that pre-job safety conferences are an integral part of the pre-planning process; — participate in reviewing the pre-work plan for appropriate health and safety activities; — monitor contractor's health and safety performance with owner's policies and procedures; and — participate in pre-work meetings and review of contractor's work plans. 	
Work-in-Progress: <ul style="list-style-type: none"> — periodically review and document the health and safety performance of the contractor and provide feedback to the contractor; — coordinate work efforts between contractors to ensure jobs performed by one; — contractor shall not be a hazard to another contractor; — assist contractors in accident and incident investigation, as needed; — maintain injury and illness log for all contractors; — participate in inspections of the contractor's health and safety performance during the work; and — verify that emergency response procedures are carried out by the contractor. 	
Performance Evaluation: <ul style="list-style-type: none"> — periodically evaluate and document the health and safety performance of the contractor and provide feedback to the contractor; — motivate and encourage contractors to expand development of their own health and safety programs, if needed; — participate in evaluation of the contractor's health and safety performance after the work is completed; — re-evaluate the approved contractor list; and — conduct audits of owner's contractor health and safety program. 	

4.6.1.2 Compliance with Regulatory Requirements

The owner's contractor safety program shall be designed to include the required elements for compliance with applicable regulations such as OSHA PSM and EPA RMP. Responsibility for implementation of these requirements shall be defined in the contract as these can change from job to job and facility to facility.

4.6.1.3 Incident Reporting and Investigation of Contractor Incidents

The owner shall require the contractor to take the lead in investigations of injuries, damage, incidents and near-misses as defined in the contract.

4.6.1.4 Inspection of Contractor Work Sites

Owners shall develop a plan to inspect contractor job sites on both a formal and informal basis. Owners with either joint management and employee Health and Safety committees or Behavioral Safety teams (or both) shall consider them as a resource and include them in these inspections in accordance with facility practice or where required. Findings shall be documented and shared in order to improve performance and establish or revise best practices.

4.6.1.5 Site Training

Access and familiarization of owner personnel to training included in the contractor health and safety program shall be considered as part of the contractor and owner orientation process. More detailed participation or training shall be considered for owner personnel at the facility who are assigned responsibility to ensure that the contractor safety program is properly implemented. In particular, the personnel designated to monitor the health and safety of the contractor while on-site are candidates for such training. Consideration shall also be given to including Contractors or contractor personnel in relevant owner's safety meetings during a project or to having owner representatives attend relevant contractor safety meetings.

4.6.1.6 Emergency Response Plans for On-site Contractors

The owner shall share site emergency response plans with the contractor, explain site expectations for contractors and coordinate contractor plans so that they are consistent with site plans.

4.6.2 Contractor Health and Safety Program Responsibilities

4.6.2.1 General

The commitment of the contractor's management and line supervisors to safety is critical because each contractor is in the best position to know how to attain their own improved safety performance. The actions described in 4.6.2.2 through 4.6.2.8 support this principle.

4.6.2.2 Compliance with the Owner's Safety Expectations

The contractor's ability to meet or exceed the safety expectations of owners has grown in importance in recent years. The recommendations provided in this standard shall help contractors meet owner expectations and identify steps that can be taken to improve contractor safety performance.

4.6.2.3 Accident Investigation and Prevention

Occupational injuries, illnesses and incidents shall be immediately reported to the owner. The contractor shall investigate and document accidents, injuries, illnesses, and near-misses. Where required by regulation (PSM or RMP) and where appropriate, use of a formal investigation procedure that seeks underlying causes shall be used. The owner shall reserve the right to either participate or independently investigate (or both) all incidents that occur on the owner's site or facility. The proximate causes shall be identified and actions shall be taken to prevent recurrence.

Investigation findings shall be shared with all affected parties. To prevent accidents, the contractor shall report any workplace hazards to the owner, irrespective of their cause.

4.6.2.4 Safety Inspections

Performing safety inspections of ongoing work is important to maintain contractor safety program success. Although the owner may conduct periodic surveys of the contractor's work, frequent and thorough safety inspections performed by the contractor are necessary.

4.6.2.5 Safety Training

The owner expects the contractor's personnel to be knowledgeable about and qualified to perform their assigned duties. This includes all applicable requirements for safety, health, and fire prevention associated with the performance of their work. The contractor upon request from the owner shall provide documentation of its employee training as evidence that personnel are trained to perform their assigned duties. The documentation shall include the names of those trained with a means of positive identification, the course content, the date the course was held, and the names of the instructors. The contractor shall review with the owner and shall ensure that contractor employees are aware of site-specific safety, health, fire protection, and emergency information relevant to the contractor's activities.

4.6.2.6 Medical Care

Proper treatment of occupational injuries or illnesses is a responsibility of every employer. All contractors shall provide information describing how they shall implement this responsibility. Contractors involved in large projects that may require greater medical response capability than basic first-aid training should consider using an on-site EMT, nurse, paramedic or physician with "occupational medicine" experience or arrange for similar off-site services with a capability for timely response. Familiarizing the medical support staff with the project, the type of work that shall take place, and the hazards that are anticipated facilitates improved medical care. As part of the pre-job package, the contractor shall provide the host employer with the names of medical providers, facilities and ambulance services it shall use in the event of a severe injury.

4.6.2.7 Emergency Response Plans

The contractor shall understand the potential emergency response needs associated with the work and site. Contractor emergency response plans should be developed in consultation with the owner and shall be consistent with the owner's site emergency response plans. Consulting with the owner as part of the development of emergency response plans increases the probability that the desired response shall take place. Periodic drills shall be conducted to practice and improve the plans. During large projects, specific plans may need to be developed to manage a large number of individuals. The designated shelter-in-place facilities used for normal response plans may not be sufficient to contain added personnel that could be present during construction or turnarounds. Therefore, planned evacuation or relocation of contract workers may be needed.

4.6.2.8 Health and Safety Program Self-evaluation

Self-evaluation by the contractors of their own programs shall assist them in understanding elements leading to success and areas where improvement is possible. The same tools used by owners for contractor evaluation may be used by contractor self-evaluation. These include maintenance of performance metrics as addressed in Annex H, job-site inspection sheets provided in Annex I and performance evaluation in Annex J.

4.7 Effective Health and Safety Communication

Ongoing health and safety discussions between owners and contractors are necessary if the contractor safety program is to be effective. Special situations with health and safety implications may arise during the course of work that were not discussed or identified during the pre-bid and pre-job safety discussions, at safety meetings, in safety

manuals or in the written safety rules. Both owners and contractors should anticipate that situations such as these shall occur as work progresses. Open communication shall be maintained between the owner, the contractor and the contractor's work force. No limitations shall be placed on the identification and discussion of any health and safety issues by either the owner or by a contractor. The identification and discussion of relevant health and safety issues shall be emphasized throughout the performance of the contract. Both the owner and the contractor shall identify a key person for each to contact as the "go-to" person for any safety program concerns.

4.8 Contractor Health and Safety Program Implementation

A facility committee may be beneficial for designing and implementing the owner's contractor health and safety program. The committee can have a positive effect in culture relative to working with and managing contractors at the location. This committee may have representation from the following functions:

- health and safety,
- purchasing,
- engineering,
- construction,
- maintenance,
- training,
- security,
- operations, and
- management.

4.9 Review of Owner's Contractor Health and Safety Program

Owners shall establish a system for reviewing their contractor health and safety program, including verification that the required elements of the contractor health and safety program are:

- in place,
- effective, and
- do not conflict with owner's program requirements for the relevant facility.

A sample protocol for evaluating an owner's contractor health and safety program is contained in Annex L. This review shall be conducted by a team of individuals knowledgeable in both facility requirements and contractor health and safety programs. A review methodology typically should include reviewing documentation and conducting on-site interviews with various levels of facility and contractor personnel.

4.10 Contractor Safety Management Elements

A comprehensive contractor health and safety process contains, but is not limited to elements in the following sections as depicted in Figure 1.

4.10.1 Develop Contractor Safety Management System

A written plan shall be developed that identifies specific objectives and documents necessary procedures. This clearly defines and assigns accountabilities; establishes measurement and evaluation criteria; and provides a system for feedback and improvement.

4.10.2 Pre-qualification of Potential Contractors

There shall be a mechanism to pre-qualify contractors for consideration for work at a facility.

4.10.3 Selection of Contractor

Contractors selected to perform work shall be qualified to perform the type of work to be done. The selection process shall ensure that the contractor understands the scope of work, and that the contractor meets the site and regulatory health and safety requirements.

4.10.4 Pre-job Verification Activities

The owner shall verify that the contractor is familiar with the location, facility, personnel, facility contractor program, hazards, facility requirements and other work information before work begins.

4.10.5 Monitoring Work-in-Progress

The owner shall monitor contractor activities while the work is being conducted, including periodic evaluation of:

- contractor health and safety performance, and
- contractor's compliance with health and safety requirements.

4.10.6 Evaluation

At the completion of the contracted work, the owner shall evaluate the overall performance of the contractor and determine if the safety results qualify the contractor to remain on the "bid list" of pre-qualified contractors.

4.10.7 Corrective Action

After evaluating contractor performance the owner determines whether changes in the contractor safety program are necessary based on work evaluations of contractor performance, and then implements these as revisions of the basic contractor management system.

5 Getting Started with Contractor Safety Management

5.1 Beginning Contractor Safety Management

The question "Where do I begin to manage contractor safety?" is often asked by owners. For contractors new to the site, the answer is "during pre-qualification." However, for contractors currently working at a facility, the answer is less clear. A suggested starting point is "monitor work" in progress (Figure 1 identifies these starting points for both new and existing contractors). Owners should review the remainder of this standard for a basic understanding of the general elements of a contractor health and safety program.

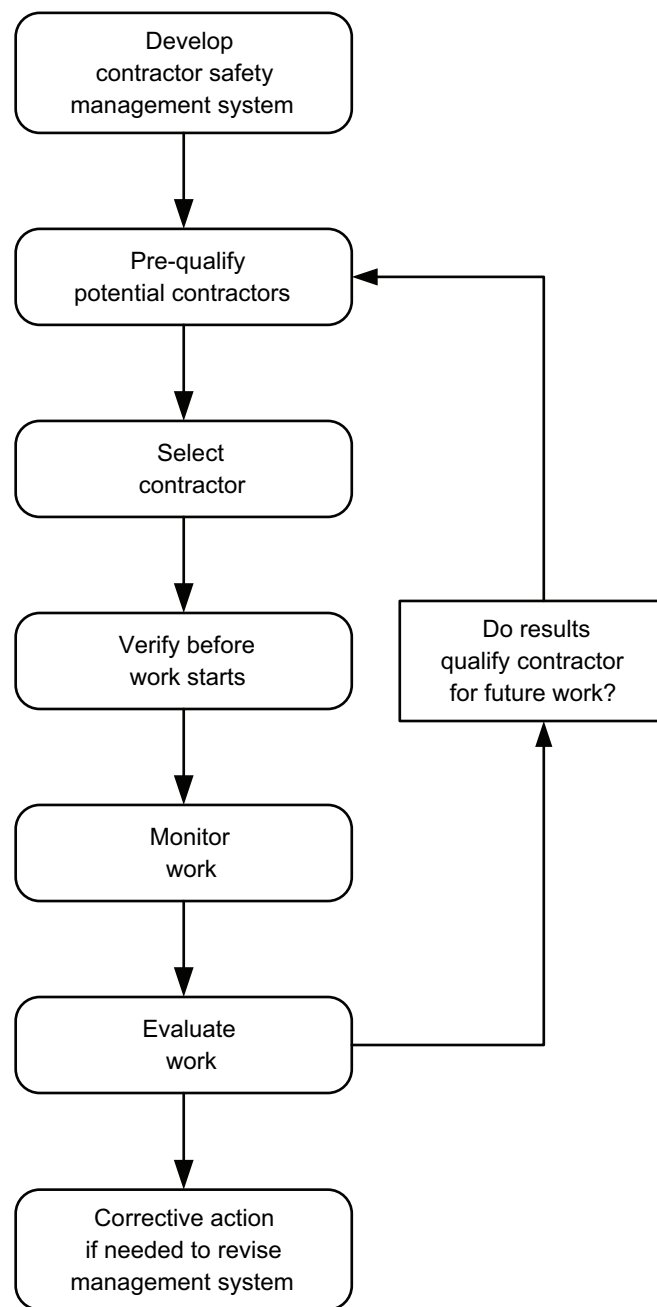


Figure 1—Contractor Health and Safety Management Elements

5.2 Evaluating Risk Levels for Contractor Work

The potential risk of injury or illness to contractor and owner employees is an important consideration in determining how to apply elements of a contractor health and safety program. Although the goal is to perform all work safely, some activities may encounter more hazards than others as indicated in the following examples.

- An administrative support person, employed through an agency providing temporary clerical support should not normally be exposed to operating machinery or process hazards. This type of contractor work should be classified as “lower potential risk.”
- A maintenance worker in a machine shop or performing work around process equipment may be exposed to physical hazard from the tools and equipment used, may be exposed to a release of hazardous material or may even cause the release to occur. This type of contractor work should be classified as “higher potential risk.”

Contractor health and safety programs shall be designed to reflect the different relative levels of potential risk associated with the work to be performed. Factors to consider include, but are not limited to the following:

- nature of the work to be performed;
- location of work to be performed;
- potential for exposure to work site and material hazards;
- potential for the contractor performing the work to expose themselves, other contractors, owner’s employees or the public to hazards;
- duration of the work to be performed; and
- contractor’s experience and expertise in performing similar type work.

This section outlines a system of classifying levels of potential risk which is estimated using Table 2 and Table 3. The development of these tables is described in the following sections. Owners may choose to use this system or develop their own.

5.2.1 Types of Contractor Work

Contractor work may be divided into the following six general types.

- 1) *Operation, Maintenance, and Construction in Process Units*—Contractors performing process operations, equipment maintenance, repair, replacement or construction in process units.
- 2) *Operation Support*—Specialty contractors providing specific, non-maintenance services to operations such as catalyst replacement and spent acid handling.
- 3) *Distribution*—On-site contractors providing support or services specifically related to the on-site distribution and handling of products and materials, non-process related equipment maintenance, and management of distribution.
- 4) *Technical and Administration*—Contractors providing clerical skills or technical expertise and knowledge in support of plant and business units.
- 5) *Site Services*—Contractors Providing Miscellaneous General Services for the Site.
- 6) *Grass Root Construction*—On-site contractors performing traditional construction with no hazardous material, temperature or pressure in systems.

Table 2—Contractor Potential Risk Levels Worksheet

Type of Work	Examples of Work Activity (Not All Inclusive)	Hazard Associated with Activity	Risk Factor		Overall Relative Potential Risk Level
			Personnel Health and Safety Potential Risk	Process Safety Impact	
Operations, Maintenance and Construction in Process Units	Abrasive Blasting Coatings Electrical Safety and Fire Protection System Heavy Equipment Operations Hot Bolting Hot Tapping Instrumentation Insulation Leak Repair Mechanical (Pipefitters, Millwrights and Riggers) Operators Scaffolding Vacuum Truck Operations Welders				
Operation Support	Asbestos, and Lead Abatement Catalyst Exchange Chemical Cleaning Container Cleaning (Barge, Railcar, Truck and Drums) Container Movement Dismantling Environmental Services Lab Technicians Marine Diving Process Operators, Product Handlers and Process Technicians Remediation Testing and Inspection Water Blasting Waste Disposal				
Distribution	Independent Gaugers Rail Repair and Construction Marine Vessel Operators				
Technical and Administration	Clerical (Unless Located in Process Units) Computer Support Engineering Support Medical Services Technical Consultants				

Table 2—Contractor Potential Risk Levels Worksheet (Continued)

Type of Work	Examples of Work Activity (Not All Inclusive)	Hazard Associated with Activity	Risk Factor		Overall Relative Potential Risk Level
			Personnel Health and Safety Potential Risk	Process Safety Impact	
Site Services	Lawn Services Communications Equipment In-plant Drivers Non-process Electrical Office Equipment Repair Security Vehicle Mechanics				
Grass Root (Green Site) Construction	Building Construction Boiler Construction Cranes and Lifting Equipment Steel Erection Demolition Electrical Excavation and Earthwork General Contractors Masonry Mechanical Painting Vessel Construction Welding				

Table 3—Potential Risk Factors and Overall Relative Risk Levels

Combining Various Risk Factors		
Risk Factor		Overall Relative
Personnel Health and Safety Risk	Process Safety Impact	
H-M-L	H	H
H	M-L	H
M-L	M-L	M
L	L	L

5.2.2 Relative Potential Risk

One method for prioritizing the use of resources in designing a contractor health and safety program involves defining relative potential risk for different types of work.

The relative levels of potential risk for each type of work may be derived by completing Table 2. The relative level of potential risk should be categorized as Low (L), Medium (M) or High (H). The relative level of potential risk is generally influenced by the following two factors.

1. *Personnel safety or health potential risk*—Risks related to health and safety hazards normally associated with the work (for example, falls from elevated areas, noise exposure, heat stress, working with power tools and tripping).

Non-process Work Activities with Associated Hazards:

- a) confined space entry;
- b) elevated work;
- c) handling hazardous materials (such as asbestos, acids, caustics and molten sulfur); and
- d) inert entry.

2. *Process safety impact*—Potential hazards associated with the materials, activities or operating conditions in a process area that may affect employees or contractor employees (such as potential for fires, explosions and toxic releases). Additional hazards may be associated with the work location (for example, working in a process unit as compared to working in an open area away from hazardous materials).

Typical Hazards Associated with Process Activities:

- a) hazardous materials;
- b) operating equipment (fixed and mobile);
- c) elevated temperatures and pressures; and
- d) potential for exposure from releases:
 - releases may be caused by maintenance personnel—either contractor or owner, and
 - personnel may be working in area where there is a release unrelated to contract work.

The owner derives an appropriate risk level for a work activity by first filling in the two “risk factor” columns of Table 2. Table 3 then provides an aid for categorizing the “Overall Relative Potential Risk Level” by summing the two risk aspects which provides the value for the last column of Table 2. (Table 3 is included to show the logic used in the development of Table 2 and is provided for informational use only.)

Examples of how relative risk may be determined include, but are not limited to the following.

- a) A contractor is hired to do abrasive blasting and painting. The work could be either H or M for personnel health and safety risk, depending on the blasting methods and materials employed and the materials to be removed and used for painting. If the work was to be conducted on a process unit while in operation, then the process safety impact should generally be high. The relative level of risk should probably be H.
- b) A contractor is retained to do abrasive blasting and painting. The work could be either H or M for personnel health and safety risk depending on the blasting materials and methods as well as the materials to be removed and those used for painting. If the work was not conducted on a process unit, then the potential process safety impact would generally be M. The relative level of risk could probably be either H or M if on a process unit, depending on the process.
- c) An administrative person should generally have low personnel health and safety risk. For this person, the process safety impact should generally be L if working in buildings away from the process area or M if working in a building near or in the process area. Again, the relative risk should probably be L.

5.2.3 Suggested Components of Contractor Health and Safety Programs

The relative level of potential risk for the proposed work of the contractor should generally influence the depth of owner involvement in the contractor health and safety program. Table 4 provides a listing of program elements and sample applicability for each type of contractor work based on the level of potential risk.

Table 4—Example of Contractor Type and Typical Contractor Health and Safety Program Elements

Contractor Health and Safety Program Element	Operational and Process Maintenance and Construction	Operation Support	Distribution	Technical and Administration	Site Services	Grass Root Construction
Pre-qualification	X	X	X			X
Listing on approved contractor list	X	X	X	X		X
Health and safety requirements identified	X	X	X	X	X	X
Health and safety requirements in bid package	X	X		X	X	X
Pre-bid meeting	X	X				X
Pre-award meeting	X					X
Required training identified	X	X	X	X	X	X
Review contractors health and safety program	X	X				X
Site visit by contractor	X	X				X
Identify communication requirements	X	X	X			X
Verify training of contractor employees	X	X				X
Emergency response involvement	X	X	X	X	X	X
Health and safety performance reporting	X	X	X	X	X	X
Contractor health and safety inspections	X	X	X			X
Owner health and safety inspections	X	X	X			X
Accident and incident investigations	X	X	X	X	X	X
Owner evaluation of contractors	X	X	X	X	X	X

5.3 Job-Specific Specialty, Temporary and Small Contractors

5.3.1 Job-specific Specialty and Temporary Contractors

Contractors may be on-site for job-specific specialty work (such as inert entry, scaffolding or hydroblasting), short-term (temporary) work or long-term work (general contractors) based on the nature of the job being performed and the facility policy. The specific requirements of the contractor health and safety program may vary for contractors doing different types of work but the basic requirements for safe work shall be the same. The hazards associated with each specific job determine the type of safety program required to maintain an acceptable and protective risk level.

Examples of how relative risk may be used to determine the need for some safety program elements include, but are not limited to the following.

- a) A catalyst exchange operation scheduled for a duration of three days to be performed by a job-specific contractor. The hazards associated with this work are significant because the work shall be conducted in an inert confined space requiring the use of special supplied air respiratory systems and protective suits. In addition, the catalyst to be removed is pyrophoric. Although the specialty contractor shall be at the facility only for a short time, the special precautions required to obtain an acceptable level of risk require this contractor to meet specific and more stringent contractor health and safety requirements (in addition to those that the general on-site contractors shall meet). Each contract company and contractor worker shall meet requirements appropriate for the work being done and the area in which the work is done.
- b) A contractor performing lower risk work, such as a lawn service contractor working outside the process areas, may not require as comprehensive a contractor health and safety program. The probability of exposure of this contractor to potential hazards is low and occurs over a short duration of time, both of which reduce the level of risk. The requirement to work safely is the same; however, the activities, potential exposure and protective measures are different.

5.3.2 Small Contractors

A small contractor may need assistance to meet the requirements of an owner's contractor health and safety program. An item such as the injury and illness rate may prevent a small contractor from being included on the owner's approved contractors list. The contractor may be so small that one injury or illness could distort the injury and illness rate. A contractor with fewer than 10 total employees may not be required by OSHA to maintain injury and illness records. Small contractors may not have the resources or experience to interpret regulations or develop and implement some or all of the elements of the owner's contractor health and safety program. Owners shall be aware of these possibilities and discuss alternate methods of meeting the owner's health and safety requirements with small contractors.

6 Contractor Pre-qualification

6.1 Qualifying a Contractor

The selection of a qualified contractor is the first step toward obtaining safe contractor performance. Owners shall evaluate contractor's safety programs by using the safety information furnished by the contractors in response to the pre-bid request. Items that may be used to indicate the quality of a contractor's safety performance include, but are not limited to the following.

- a) The contractor's commitment to safety as demonstrated by an ongoing safety program that is supported by its top management and line supervisors.
- b) The contractor's safety programs completeness and appropriateness for the work site and the safety standards of the owner.

- c) The contractor's response to pre-bid safety requests (see Annex B), which may include, but are limited to the following.
- 1) Injury and illness incidence rates (from OSHA Log or equivalent).
 - 2) EMR, if applicable.
 - 3) The contractor's safety staffing plan naming the on-site person or persons designated by the contractor and subcontractor who shall be responsible for safety including a description of their expertise and authority.
 - 4) a description of the safety orientation program to be provided by the contractor to all contractor employees on-site.
 - 5) The contractor's enforcement and disciplinary action program regarding safety violations.
 - 6) The contractor's policy and programs regarding alcohol, controlled substances and firearms.
 - 7) A list of safety equipment that shall be provided by the contractor.
 - 8) A narrative from the contractor's viewpoint that identifies the significant hazards of the job and a listing of the steps that shall be taken to eliminate, control or minimize the potential for accidents.
 - 9) A description of the contractor's programs to comply with applicable regulatory requirements [for example, OSHA, U.S. Department of Transportation, The Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) and state governments].
 - 10) A description of the contractor's employee training program.

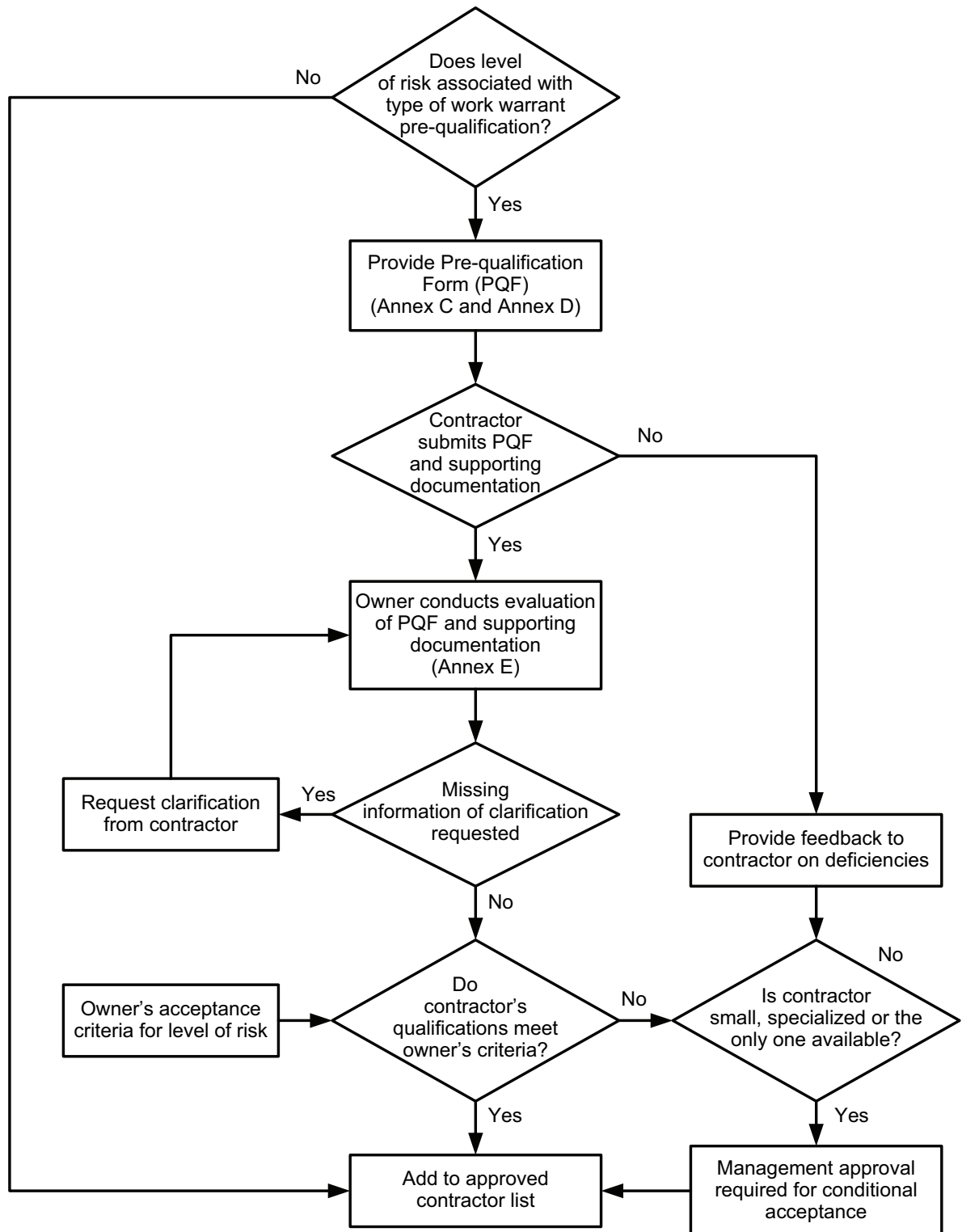
As part of the commitment described in 1.3.1, an owner's management shall make it clear that high-quality safety programs and high safety performance are key elements in the selection and post-work evaluation of any contractor.

Generally, pre-qualification is the initial step undertaken by owners to evaluate a new contractor or contractors who have not worked in the facility recently. Pre-qualification is recommended for contractors who work on-site and whose work activities may have the potential to expose their employees, other contractors, owner employees or the community to reasonably foreseeable health and safety hazards. This should be determined by the level of risk associated with the contractor's work on-site (see 5.2). Pre-qualification evaluates the prospective contractor's ability to meet the owner's health and safety performance criteria and requirements.

Figure 2 illustrates the process (with its sub-elements) used to implement a pre-qualification system. Each element and sub-element corresponds to the structure of this guide. It is important to note that the process depicted in Figure 2 includes decision points which provide a feedback mechanism for continuous improvement of the contractor health and safety program.

In some cases, contractors cannot meet the owner's pre-qualification health and safety criteria because they are small or are the only contractor available. The flowchart suggests, as an option, that in these cases owners may provide conditional acceptance of such contractors. This conditional acceptance shall provide a specific time period and specify additional requirements and administrative controls necessary for the relative level of risk for the work to be performed. While there may be a compromise regarding pre-qualification, it shall be made clear to the contractor that there shall be no compromise of the owner's safety performance requirements during conduct of the contracted work.

Contractors that use subcontractors shall establish a pre-qualification system for subcontractors similar to that used by the owners to qualify contractors.

**Figure 2—Sample Contractor Pre-qualification Process**

6.2 Pre-Qualification Form (PQF)

Owners may utilize a PQF completed by the bidding contractor to determine whether a contractor's health and safety qualifications are adequate for performing work at the facility. The primary purpose of a PQF is to obtain and evaluate information about a prospective contractor. A sample of a PQF is provided in Annex B.

A PQF prompts the contractor to provide some of the necessary information for an owner to complete an initial evaluation of the contractor's health and safety performance and ability to comply with health and safety requirements. Major sections of a PQF and the purpose of each section may include:

- a) *General*—Provides basic information on the contractor including location and contacts.
- b) *Organization*—Provides basic financial information, services provided, and work requiring subcontractors.
- c) *Health and Safety Performance*—Provides information on the contractor's past and current health and safety performance, including injury and illness data and workers compensation claims.
- d) *Health and Safety Programs and Procedures*—Identifies the contractor's health and safety programs and policies and provides information on the contractor's substance abuse program.
- e) *Health and Safety Training*—Identifies the type of training given to contractor employees and supervisors regarding health and safety issues specific to the processing industries.
- f) *Health and Safety Coordination*—Provides information on health and safety staff available to support the contractor, health and safety support structure, and reporting relationships.
- g) *Company Work History*—Identifies both current and previous job safety performance history for the specific types of work that shall take place. If the company has changed ownership without a change in management the performance of the former company should be examined.

A sample cover letter for a PQF is included in Annex C. A cover letter should generally state the owner's minimum requirements for acceptance to the owner's approved contractors list as discussed in 6.3.1.

6.3 Owner Review of Contractor Qualifications

The owner shall establish and implement a method of reviewing and determining whether a contractor can meet the owner's health and safety requirements and should be considered for work at the facility. This evaluation shall be based on the contractor's representations and knowledge of safety performance on the owner's projects.

Security issues maintain a high profile in all aspects of industry, including contractor screening and qualification. While security is outside the scope of this standard, it is an issue which owners should address as part of their selection process. Legislation in the future may establish mandatory requirements. Many owners already have written into their contracts a requirement for background security screening of all contractor personnel who may be on-site in any capacity, and those off-site personnel who have access to facility data.

6.3.1 Acceptance Criteria

Owners shall establish appropriate health and safety performance acceptance criteria. Typical acceptance criteria may include, but are not limited to the following.

- Workers Compensation Experience Modification Rate (EMR) as determined for each state.
- Lost Workday Cases involving Days Away from Work, as defined by OSHA in 29 CFR 1904 and recorded on the OSHA Log Form 300.

- OSHA Recordable Injury and Illness Rate, as defined in 29 *CFR* 1904.
- Compliance with Contract Employer Responsibilities under OSHA's PSM standard (1910.119[h][3]) for those operations involving covered processes. Discussion with the owner may be required to fully determine scope of these requirements.
- Substance abuse program.
- Written health and safety program that documents policies and procedures for employees.

Table D.1 in Annex D may be used by an owner to develop acceptance criteria for different types of work. In completing Table D.1, owners may consider using results from the previous reporting year, a three year average, an NAICS Code (formerly SIC Code) comparison according to contractor type in developing its own criteria. For facilities in other countries with different recordkeeping methods, comparable data should be used.

For small contractors or when a thorough search results in only one contractor available to perform the work, exceptions to the acceptance criteria may be considered and such a contractor may be granted conditional acceptance. A thorough search should consider other contractors not in the site area who are able to do the work and meet the criteria or approved contractors with good safety performance willing to take on new activities.

6.3.2 Review of PQF

Once a PQF has been completed by the prospective contractor, the owner should review the PQF for completeness, and evaluate it against the owner's written acceptance criteria. The PQF evaluation should generally be completed by knowledgeable contractor personnel familiar with health and safety data.

Annex D provides a sample form for evaluating the information submitted by the contractor. This method is a simple evaluation to determine if the provided information is acceptable or if improvement is needed. Because it is based on a combination of statistical and descriptive information provided by the contractor, this evaluation includes a significant subjective element. It relies on the reviewer's experience and knowledge; personnel involved in the review should be knowledgeable in health and safety requirements.

During completion of a PQF, the question may arise regarding the amount of documentation needed or necessary for submittal. Some owners may want to determine whether the contractor has certain key elements or has all of the elements as part of their health and safety program. Other owners may want to review the entire program to determine the level of detail and completeness of the health and safety program. An owner should identify which supporting material is to be included with a PQF.

Owners may choose to provide feedback to the contractor on areas that need improvement in order to assist the contractor in improving his health and safety programs. This feedback may enable the contractor to meet the owner's acceptance criteria, if it presently does not. Additionally, owners may review the PQF and materials with the contractor in order to:

- a) provide feedback to the contractor, and
- b) either validate the owner's interpretation of the results or follow-up on deficiencies (or both).

6.4 Owner's Approved Contractor List

An owner-approved pre-qualification list of contractors may be developed. Such a list could contain information including, but not limited to the date the contractor is entered onto the list, the date the contractor is reviewed and qualified, the type of work the contractor is qualified to perform, and other information deemed appropriate by the owner. Information on maintaining such a list is contained in Section 10.

At times, contractors may be required to perform work on an “emergency” basis. This may involve using a contractor who has not been pre-qualified. Management shall be sensitive to the risks associated with using contractors on an emergency basis and may establish specialized controls for the work. Planning, scenario analysis and recognition of hazards by the owner may identify potential “unplanned” needs, identify and qualify potential contractors and keep such situations from becoming an emergency.

7 Selection of Contractor

The steps for owners to consider in selecting a contractor are provided in this section.

7.1 Owner Identifies Health and Safety Requirements

After determining the type of work and level of potential risk associated with the work to be performed by a contractor, the owner shall identify the health and safety requirements and communicate them to the contractor. Contractors may be selected because of their expertise, knowledge of anticipated hazards, and special health and safety requirements associated with specialized work. In such cases, the owner may specify that the contractor have the primary responsibility for implementing additional health and safety requirements applicable to their specialty. These contractors shall meet owner requirements and operate in a manner consistent with facility or site safety regulations. The owner shall review and agree with the contractor’s work approach for the job.

It is important for the owner to be thoroughly familiar with the nature and location of the work. The owner shall consider the duration of the project, type of work to be performed, and location of the work within the facility prior to developing health and safety requirements for a pre-bid package. It is important for the owner to recognize that emergency type work (for example, nonscheduled and off-shift work) may have additional or different hazards associated with it. Some contractors (such as those specializing in leak repair or working with radioactive sources) may have more experience and knowledge relevant to the hazards involved and in such cases shall be consulted to establish mutually agreeable safety procedures.

The owner shall develop specific health and safety requirements to address reasonably foreseeable hazards associated with the work to be performed. The contractor shall be aware of and familiar with mandatory requirements (for example, if a contractor is required to perform maintenance on process equipment, mandatory requirements should typically include knowledge of the safety requirements of the owner, the work permit system and applicable OSHA standards such as HazCom, PSM, lockout, and tagout procedures as well as any other national or local regulatory requirements).

The references and Annex E include partial lists of federal regulatory requirements for selected work activities with space provided for specific location requirements. Federal and state requirements for training shall be considered. The owner shall include information in bid packages to identify regulatory and specific owner’s health and safety requirements. There shall be a clear understanding that this provision of regulatory information is provided only as assistance by the owner to the contractor. The contractor (as the employer) is always responsible for ensuring that contractor personnel have the knowledge and training required by law and that the work done by their employees is in conformance with regulatory and owner requirements.

7.2 Contractor Develops Health and Safety Programs and Procedures

Contractors shall develop their own written health and safety program commensurate with the level of potential risk associated with the type of work they perform. Items to be incorporated by the contractor into its health and safety program include, but are not limited to:

- a) an outline of mechanisms for compliance with applicable regulations, codes, standards, and the owner’s health and safety requirements;
- b) a list of potential hazards, safety training and hazard communication procedures;

- c) a list of key personnel, emergency action plans, and the person responsible for the health and safety programs; and
- d) health and safety requirements for the specific project or work.

Owners may require the use of their own procedures or contractors may elect to use the owner's health and safety procedures while at the location. Agreement shall be reached on which procedures are to be used prior to beginning work (it may be beneficial to agree in writing). The owner shall ensure that no liability is assumed when the contractor agrees to use the owner's procedures.

The contractor cannot replace the owner's requirements without prior written agreement. When contractor procedures are used, they shall meet or exceed owner requirements. In all cases, the contractor as the employer of contract personnel has the responsibility to ensure compliance with applicable federal, state or local regulations. Annex E has a partial list of contractor health and safety programs that may have written procedures and lists some consensus resources and applicable regulations.

7.3 Training and Communications

7.3.1 Training Requirements

As an employer, contractors have the responsibility to provide appropriate information and to provide or confirm training to ensure that their employees have adequate knowledge and skills to perform their jobs safely. The contractor is generally responsible for ensuring that health and safety training is provided for its employees unless otherwise stated in the contract. An extensive listing of potential requirements for health and safety training is included in Annex F.

Upon final review of the scope of work, owners and contractors shall identify any site or job-specific health and safety related training necessary for contractor employees to perform the work and agree on how this training shall be accomplished and verified.

API 1200 (withdrawn), *Federally Mandated Training and Information* provides guidance on U.S federal regulatory training requirements for specific work activities. The training needed to comply with these requirements shall be considered, depending on the nature and duration of the work. To assist in identifying and organizing training requirements based on the work to be performed, a training matrix similar to the sample found in Annex F could be developed by owners for each location and unique or specific job. OSHA Publication 2254 1998 (Revised), *Training Requirements in OSHA Standards and Training Guidelines* may also be useful in reviewing regulatory requirements. ANSI Z490.1, *Criteria for Best Practices in Safety, Health and Environmental Training* may assist owners and contractors in developing training programs.

7.3.2 Communicating Requirements

Owners and contractors are responsible for communicating the appropriate information regarding workplace hazards and health and safety requirements to their employees. The communication of this information to employees may be through orientation, training, Material Safety Data Sheets, safe work permits, signs, posters, procedures, and other verbal information and written materials.

The owner has several methods to ensure that contractors meet these important safety communication requirements. One method is to require the contractor to provide the availability of bilingual supervision at the job site, where needed. Another way, particularly in the United States and other predominantly English speaking countries, is to require the contractor to meet certain English language requirements based on the level of health and safety risks associated with the type of work to be performed. The U.S. DOL OSHA web site provides a number of resources in Spanish.

7.3.3 Emergency Response Requirements

The owner shall supply site and company specific emergency response information. It is the contractor's responsibility to comply with the owner's emergency response procedures and evacuation plans. Each contractor shall develop written procedures for the safe evacuation and accountability of their personnel in the event of an emergency. Items to consider in evacuation procedures include, but are not limited to emergency alarms and signals, evacuation routes and designated assembly areas, and the method of accounting for personnel during and after an incident.

It is important for contractor employees to be trained in (know and understand) owner emergency response procedures, including alarm systems and evacuation requirements and routes. This training is often provided through contractor employee orientation programs. However, if orientation programs do not address emergency response issues, specific emergency response training is necessary. Contractors shall include sufficient documentation of the training to verify that all contractor employees know and understand the applicable provisions of the owner's emergency response plan and the contractors emergency response requirements.

7.3.4 Safety Meetings

Contractors shall conduct regularly scheduled safety meetings to provide on-going training and communication of health and safety issues. Depending on contractor employee performance, a safety awareness program may be considered. Subcontractors shall also provide or participate in appropriate safety meetings.

7.3.5 PSM Requirements for Covered Processes

Owners using contractors on or adjacent to a "covered process" as defined in OSHA's PSM rule or EPA's Risk Management Program (RMP) rule shall verify that their contractor health and safety program includes the applicable regulatory requirements when working in those covered units or facilities. Annex E provides information on PSM and RMP responsibilities for both owners and contractors.

7.4 Contractor Bid Package and Pre-bid Safety Meeting

An owner may inform a contractor of its safety expectations by clearly outlining its safety performance requirements in its bid package. Each pre-bid package shall define the safety standards the contractor is expected to meet. Bid packages and subsequent safety meetings may not be practical for certain projects, such as short-term, non-process-related projects. In such situations, the owner may require the contractor's program to meet safety standards that are at least equal to the owner's. The owner shall request specific safety information from the contractor that can be used as part of the selection process, and for the proposal to be complete, it is critical that the contractor provide this information in a clear manner. (A pre-bid meeting may be useful to reinforce this point.) In addition, the contractor shall be informed of the selection criteria and, where appropriate, that the lowest bid should not necessarily be selected. Annex B provides an example of the type of information that may be requested in a pre-bid package or during a pre-bid meeting.

7.4.1 Owner Provides Pre-bid Package

A PQF is designed to provide information about a contractor's ability to comply with general health and safety requirements. A pre-bid package also allows the contractors to verify that they have the ability to satisfy the owner's requirements. Specific health and safety requirements are generally included as specifications in the invitation to bid. These requirements include, but are not limited to the following:

- the personal protective equipment (PPE),
- substance abuse screening,
- vehicle safety requirements,

- general safety rules,
- whether requirements of the OSHA PSM apply,
- work permit system, and
- chemical list.

If clarification is requested by bidders, the owner may identify appropriate representatives to be contacted regarding health and safety requirements.

7.4.2 Pre-bid Meeting

Pre-bid site visits and pre-bid meetings provide prospective contractor bidders with an opportunity to evaluate job-site conditions and to obtain clarification of bid or work scope requirements. The pre-bid meeting is the owner's opportunity to elaborate on the requirements as stated in the bid documents. In addition, it provides a forum for an interactive exchange with potential bidders to discuss their questions and concerns. The pre-bid site visit provides bidders an opportunity to examine the job site in order to reach their own conclusions regarding the many site-related factors (for example, physical conditions and constraints, labor market, laydown area, access and congestion). The pre-bid meeting is also an opportunity for the owner to share (with potential bidders) any unique knowledge regarding the project or site and how such factors may affect the contract.

All meetings held prior to award are generally conducted using the owner's contract procedures. Examples of the type of information to be covered at pre-bid meetings include, but are not limited to the following:

- a) Introduce owner and contractor participants (this should include personnel who shall be on-site during the actual work):
 - point of contact for questions,
 - role of participants, and
 - brief description of evaluation process and target award date.
- b) Review technical requirements:
 - overview of project scope,
 - interface with other contractor's work packages and crews, and
 - quality.
- c) Review site considerations:
 - health and safety considerations,
 - access security requirements for site and work areas,
 - facilities and utilities provided (by owner or to be supplied by contractor),
 - permits required and permits furnished (site and regulatory), and
 - any special community sensitivity issues or concerns.
- d) Review schedule requirements of milestone dates.

e) Emergency response requirements:

- site alarm emergency system,
- evacuation procedures, and
- emergency communication.

f) Incident Investigation and report protocol:

- owner requirements and expectations, and
- regulatory reporting and investigation requirements.

7.5 Contractor Selection

Upon completion of the health and safety criteria evaluation and a review of the contractor's ability to comply with the applicable health and safety requirements, the owner selects the contractor(s). The final selection should consider the selection criteria established in 6.3.1 and may include other items such as cost, availability, and technical qualifications.

7.6 Pre-award Meeting

After selection and approval of a contractor, owners shall consider holding pre-award meetings with the selected contractor to ensure that a clear, mutual understanding of the work to be awarded has been reached. Examples of actions to be covered at the pre-award meeting include, but are not limited to the following:

Reaffirm and confirm understandings that have been reached during the pre-bid and bidding stages and acceptability of any changes and resolve detail issues that affect the job:

- discuss specific health and safety activities that should be accomplished by the contractor;
- discuss reporting requirements of the contract;
- discuss owner and contractor relationship for subcontractors, if applicable; and
- review emergency response actions.

7.6.1 Modifications to Health and Safety Requirements

The contractor shall review the owner's health and safety requirements and performance criteria prior to accepting the contract to identify any possible hazards or hazardous conditions that may arise by the actions or methods proposed when performing the work. The owner and contractor shall work together to determine the necessary health and safety requirements, recognizing that the contractor retains primary and ultimate responsibility for the health and safety of contractor employees and for ensuring that the work performed by the contractor does not create hazards to others.

7.6.2 Site-specific Health and Safety Requirements in Bid Package

Safety procedures vary among companies and job sites and may have a significant impact on a contractor's proposal and subsequent work. Therefore, even though the contract language and pre-bid package include the requirement to follow all rules and regulations, it is important that before the contract is awarded, each bidder be made aware of the specific job-site safety rules that shall apply. Health and safety requirements for the contractor shall be consistent with the requirements established by the owner for its employees. These requirements shall also include general site issues such as use of fire retardant clothing and PPE.

7.6.3 Contractor Review of Personnel, Tools and Equipment

Using the owner's information, pre-job checklist, and hazard communication information, the contractor shall:

- perform a final assessment of its ability to perform the scope of work and comply with all applicable health and safety requirements;
- determine that the resources of manpower, safety equipment, and training are adequate for the job; and
- ascertain that the personnel have the knowledge, information, and training necessary to safely perform their assignments.

Appropriate required PPE is normally agreed to by the owner and contractor. The determination of who provides and maintains the PPE shall be agreed upon before the work starts. Generally, the contractor is accountable for providing and maintaining required contractor employee PPE unless otherwise stated in the contract. For instance, specialty equipment may be provided by the owner which is designed for protection against specific hazards, such as encapsulated chemical suits for working in phenol or HF areas. In addition, contractor employees may be responsible for providing their own safety shoes, safety glasses, gloves and other personal equipment.

7.6.4 Contractor Demonstrates Ability to Perform

The contractor shall provide the necessary assurances of ability to provide the necessary job skills while complying with applicable health and safety requirements and performance criteria. The form and detail of these assurances shall include, but is not limited to previous experience with the owner, the type of work to be performed, and the relative level of risk.

7.7 Contractor Award

The contractor is generally required to sign a written agreement (contract) that commits the contractor to accept certain requirements, including, but not limited to the following:

- abide by applicable governmental and owner health and safety requirements;
- employ or cause to be employed only persons who are fit, trained and skilled in the work to be performed;
- either provide equipment or use equipment (or both) that is safe to operate and meets owner and governmental requirements; and
- provide authorized owner representatives access to their work area(s).

Such an agreement specifies that the contractor, not the owner, retains the authority to hire, fire, discipline, supervise, control, and direct the work of contractor employees, as well as direct and adjust the terms and conditions of their employment. Although standard safety language (for example, "the contractor shall comply with all federal, state and local safety regulations") is typically included in a contract, additional safety language may be necessary to clearly convey the owner's expectations. To minimize the need to modify the owner's existing contract language, a specific safety addendum can be developed and attached to the contract when more detailed safety requirements shall be addressed for a particular project or work activity. Annex M provides examples of contract safety language and a safety addendum.

7.8 Emergency Work

The owner shall establish procedures for handling unscheduled "emergency" work in those instances where it may not be practical to follow normal bidding and contract procedures. Consideration shall be given to reviewing potential needs and qualify specialty contractors who may be needed on short notice (see 6.3 and 6.4). Conformance to regulatory and site safety requirements shall be required regardless of the perceived emergency nature of the work.

8 Pre-job Activities

8.1 General

It is important for the owner and contractor to cooperate in pre-job activities. The pre-job review typically includes a site visit which provides an opportunity for the contractor to become familiar with the location, facility, personnel, equipment, safe work, operations and other owner requirements and information. This pre-job review is an important bridging step in working together to prevent incidents and resolve health and safety issues. During the pre-job review, the contractor has the opportunity to preview fire protection, safety, and emergency evacuation areas as well as observe the work environment and agree to the amount of facility-specific training required. The amount of detail and effort required for the pre-job activities is generally commensurate with the level of risk for the work and the scope of the job.

8.2 Pre-job Review and Site Visit

After the contract has been awarded, a pre-job safety meeting shall be held between the contractor and the owner. The owner's representatives shall discuss the specific safety requirements of the project with the contractor's representatives who shall be directly responsible for overseeing the work. This discussion is important because the contractor's representatives who attend the meeting may not be the same individuals who prepared the bid or attended the pre-bid meeting. See Annex G for a sample checklist which includes items that typically are applicable to a pre-job review site visit.

8.3 Planning the Work

The contractor is usually responsible for planning, performing, and completing the work. The owner is usually responsible for reviewing and approving the contractor work plan and monitoring contractor performance. It is important for the owner and contractor to understand their individual responsibilities during the planning, performance, and completion stages of work. Emergency procedures, inspection and evaluation procedures, and training requirements are an integral part of the work planning process.

The owner and the contractor shall agree on the safe work practices to be used in controlling the entrance, presence and exiting of contractor employees in and out of the facility as well as into covered process areas. Use of safety tools such as the Job Safety Analysis (JSA) may assist in the planning process.

If subcontractors are involved, their work plans and methods shall be consistent with the contractor's requirements and shall be reviewed and accepted by the contractor and the owner.

8.3.1 Finalizing Health and Safety Requirements

Owners may have their own requirements for health and safety in addition to OSHA requirements that reflect site specific needs. Because contractors may work at various facilities with different requirements for the same work, owners may analyze requirements that exceed those required by OSHA to determine if value is added by those additional requirements.

When conducting such analysis, owners shall consider the potential benefits of eliminating or reducing additional requirements, including, but not limited to the following:

- improved safety performance by eliminating confusion;
- increased productivity;
- reduced training time required by the contractor employer; and
- reduced owners site-specific training for additional requirements.

In making this analysis, the owner shall ensure that the requirements do not establish a lesser standard of care for contract employees than for owner employees.

Before work is started, the owner shall identify and present to the contractor's management important health and safety rules required by the owner for working at the facility. All or part of this information shall be used in the safety orientation conducted by the owner or the contractor. This information shall be communicated to contractor employees through one or more of the following: written material, a safety handbook, a videotape, and verbal instructions. The same sample site visit check list from Annex G used for the pre-job review can be used when finalizing requirements if a site visit is needed to communicate with personnel who may not have been involved previously.

Also prior to initiating work, it is important for contractors to inform owners of any recognized or potential hazards that the contractor plans to bring to the job site (such as hazardous materials or specialty equipment). Hazardous materials not previously on the site should be accompanied by an MSDS (with a copy provided to the owner).

8.3.2 Training

This document provides guidance on contractor safety training requirements for contractor personnel who anticipate working at petroleum or petrochemical industry sites. It helps identify who needs to be trained, how often, what is to be included in the training and what is to be included in the training management process. Not all requirements fit all situations; training criteria shall be identified based on the nature of the work.

Contractor safety training is intended to accomplish several objectives including:

- raise contractor employees' ability to recognize safe and unsafe conditions in another company's site and how to address and protect one's self against unsafe situations;
- comply with applicable regulations (in the U.S. OSHA or state) requiring the training of contractors working at operating and construction sites; and
- provide the basic safety training required by owner's (petroleum or petrochemical) facilities.

8.3.2.1 Basic Contractor Safety Training

The contractor is responsible for verifying that its employees are properly trained to perform the necessary tasks and are educated regarding the facility's health and safety policies, procedures, and hazards associated with the work. The information submitted by a contractor in response to an owner's pre-bid request (see Annex B) shall describe the specific training that the contractor intends to accomplish before and during the project. If needed, discussions should be initiated that shall further define and assign responsibility for specific training that the facility or contractor may need to provide.

It is important for owners to verify that contractor employee orientation training is conducted. In order to comply with regulatory requirements, the basic contractor training provided to contractor employees shall address the criteria listed in Annex F where relevant to the work to be performed.

Training shall be provided at least once every three years, except where regulations require more frequent training (such as for respiratory protection or hearing conservation programs) or when contract employees do not demonstrate understanding of good safety practices.

Training shall include presentation of material so that the individuals being trained understand the material being covered. The training and the evaluation of understanding shall be documented.

Documents with a positive means of individual identification (such as photographs) shall be issued to attendees who have successfully passed the Basic Contractor Safety Training course covering material comparable to that required by Annex F.

Upon request, the Contractor Safety Training Program outline and sample quizzes or other evaluation tools used by the contractor (or its training provider) shall be provided by the contractor to the site management.

8.3.2.2 Site-specific Safety Training

Contractor employees are expected to receive health and safety training that covers safety programs specific to the facility such as:

- entrance and exit requirements and routes,
- emergency alarms and response,
- work restrictions within the site,
- hazardous materials at the facility,
- required PPE,
- work permit system,
- security,
- plant and process overview, and
- other aspects of safe operations deemed necessary by the site management.

This training shall occur only after the contractor employee successfully completes a Basic Contractor Safety Training course as outlined in Annex F.

A method to evaluate the effectiveness of site health and safety training shall be considered part of the training program. This evaluation includes, but is not limited to written and verbal examinations, demonstration of skills and on the-job evaluations. Evaluations to confirm contractor employee understanding of health and safety requirements shall be conducted by facility and contractor management representatives as agreed upon in the pre-job training plan. Re-training and re-evaluation of contractor employees shall be conducted when demonstrated knowledge of the Health and Safety requirements is not achieved.

8.3.3 Verification of Training

It is important for the contractor to maintain records of training and shall make them available to the owner upon request. The owner shall retain the right to periodically review the contractor's training records to verify that training is being conducted and meets the agreed criteria. Contractors shall periodically review their employees' training schedules, performance and materials to verify that training is current and pertinent.

9 Work-in-Progress

9.1 General

The owner and contractor each have roles in monitoring and evaluating work-in-progress. A successful monitoring program includes, but is not limited to health and safety performance reporting, inspections by owners and contractors, industrial hygiene monitoring, incident reporting, emergency drills, evaluation and corrective action. Contractors shall understand that under normal Management of Change protocols only the authorized owner's

representatives can change the scope of a project. Both owners and contractors shall recognize and acknowledge that changes in the scope of work could require additional planning and training.

9.2 Health and Safety Performance Reporting

Contractors shall maintain a record of all work-related injuries and illnesses in accordance with OSHA Recordkeeping Requirements and provide them periodically to the owner. Contractors who work on-site shall complete periodic health and safety performance reports for the owner. Two sample reporting forms are provided in Annex H. The owner can use these performance reports in addition to information from its own inspections to monitor the contractor's health and safety performance.

9.2.1 Maintaining Safety Statistics for Contractor Performance

In order to demonstrate continuing owner interest in safety performance throughout the duration of a project, the owner shall ensure receipt of all job-site OSHA Form 300 logs specified in 9.2, or when OSHA statistics are not applicable, other measures of safety performance agreed during the planning and pre-job stage. The owner shall receive a copy of an incident investigation report for each on-site OSHA-recordable case experienced by employees of the contractor and its subcontractors while carrying out the contract. Contractors shall also provide owners with a copy of near-miss and other reports on incident (such as fires and releases), if required by the contract or pre-job arrangement. Reports shall be provided in a timely manner following the injury, illness or incident.

9.2.2 Reviewing Contractors' Safety Performance

The owner shall conduct periodic reviews to verify that contractors performing work on-site have implemented effective safety programs that comply with the contract. Conducting periodic joint job-site reviews with the contractor's management is an effective way to assess the contractor's compliance and achieve rapid remediation of non-compliance. Evaluation checklists such as the one in Annex J can assist in the review.

9.3 Inspections

Owners shall monitor contractor compliance with health and safety requirements on an ongoing basis. The frequency of monitoring depends on the level of risk associated with the work that the contractor is performing. The frequency and level of detail of these inspections is dependent on the contractor's health and safety performance history at the site in addition to other criteria. A sample inspection checklist for use by owners and contractors is provided in Annex I.

9.3.1 Owner Inspections

The owner shall periodically review the contractor's health and safety programs, policies and procedures, and request that they be updated by the contractor when circumstances warrant a revision. The owner shall also periodically monitor the contractor's work for compliance with health and safety requirements. The owner shall maintain an oversight role when inspecting and monitoring the contractor's activities. This oversight role does not involve direct supervision, instruction or management of contractor personnel. To go beyond this oversight role could create liability for the owner.

9.3.1.1 Informal Job-site Reviews

"Walk-through" health and safety reviews shall be performed periodically by the owner. Walk through reviews may be scheduled in advance or may be unannounced. These informal reviews do not have to be documented. However, deficiencies shall be noted to determine if these observations recur during subsequent walk-through visits. Sufficient deficiencies shall lead to a formal inspection jointly conducted by owner personnel and contract supervision. Any hazardous condition observed shall be addressed immediately at the time of observation.

9.3.1.2 Formal Periodic Health and Safety Inspections

Formal periodic inspections shall be conducted and documented by the owner to monitor contractor health and safety performance. Deficiencies shall be documented and addressed with contractor management following the inspection. Any deficiencies which may put personnel, equipment or operations at risk shall be addressed immediately.

9.3.2 Contractor Inspections

Contractors shall conduct periodic internal reviews consistent with their own procedures. If required by contract or pre-job arrangement, the results shall be provided to the owner to verify compliance with applicable owner and regulatory health and safety requirements.

9.3.3 Review of Inspection Findings

Where required by contract or pre-job arrangement, owners and contractors shall implement a system to review each other's inspection findings. Under such a system, the recommendations for follow-up corrective actions shall be discussed and agreed upon by both owner and contractor.

9.3.4 Corrective Actions

The contractor shall track all agreed-upon recommendations for corrective actions in a systematic manner through closure (when the corrective action is completed). It is the responsibility of the contractor, not the owner, to communicate to contractor employees the steps that shall be taken to correct deficiencies. Contractors shall report the inspection findings, recommendations and corrective actions to the owner. The owner shall periodically review all open corrective actions to expedite correction.

9.4 Accident and Incident Reporting

Contractors shall report to the owner all occupational injuries, illnesses, incidents and significant near-misses associated with the contractor's on-site work. This includes property damage, spills, releases, fires and incidents creating public or media attention. Significant incidents shall be reported verbally immediately, followed by a written report to the owner within 24 hours. The owner shall identify the means of communication and persons who are to receive these reports. In the U.S., fatalities in the workplace or multiple (three or more admissions) hospitalizations require regulatory notification to federal or state OSHA within eight hours. Certain spills and releases have mandatory state or federal environmental reporting requirements. Similar requirements may exist in other jurisdictions.

Accidents and incidents are usually reported on an accident and incident report form. Information on an accident and incident report form shall include all elements required by the OSHA Log Form 300 and OSHA Incident Report Form 301 that includes, but is not limited to the following:

- names of affected employee and witnesses;
- date, time and location of incident;
- incident description (what the person was doing and what happened);
- nature of the injury or illness;
- object or substance that directly harmed the injured person; and
- severity of the injury and effect on work status.

Additional information may be required by the facility or the Contractor's Workers Compensation insurance carrier.

Some incidents require mandatory subsequent investigation that includes, but is not limited to the following:

- potential equipment, either management or program deficiencies (or both);
- either the apparent or underlying causes (or both);
- identification of potential corrective action to prevent a recurrence;
- person responsible for ensuring implementation of corrective action; and
- timetables for corrective action.

The owner and contractor shall conduct a joint incident investigation of incidents that occur on the owner's site and involve or affect contractor employees.

OSHA's PSM standard requires that each incident that resulted in or could reasonably have resulted in a catastrophic release of a highly hazardous chemical in the workplace shall be investigated with subsequent reporting and recommendations. Specific requirements are outlined in the OSHA PSM regulation regarding timeliness, participation, results, communication and follow-up. Similar mandatory requirements appear in the EPA RMP rule for specified processes, materials and incident types.

Consistent with the owner's requirements, the contractor shall provide the owner with copies of incident reports as part of health and safety performance reporting. A sample form for periodic reporting of incidents is shown in Annex H. Owners shall share the findings of incident report investigations and recommendations that shall improve or impact contractor safety with all appropriate contractors working at the facility.

9.5 Emergency Drills and Exercises

Owners shall require contractor employees, after they have received appropriate orientation and training in emergency procedures, to participate in facility emergency drills and exercises. The owner shall advise the contractor when drills are to be conducted. It is important that contractor employees are adequately trained and informed of the actions to take during drills and are knowledgeable of the owner alarm systems and emergency procedures.

Contractor muster locations shall be identified and contractor personnel who evacuate work areas during drills and actual emergencies are expected to gather there. Procedures shall be instituted to conduct "headcounts" to account for all contractor personnel.

9.6 Workers New to the Site

Workers new to the site, including subcontractors brought onto the job after the job start, shall be provided the required training defined in this document.

9.7 Change in Work Scope

When the work scope is modified during a project, the owner and contractor shall review the guidance in Section 4 and Section 5 and determine what health and safety program modifications, if any, are required. These modifications shall be addressed through the owner's management of change or similar procedure. Owners shall communicate to contractor supervision those aspects of Management of Change that affect their work.

All modifications to the health and safety requirements of the work site shall be communicated by the contractor to its employees impacted by the changes.

10 Health and Safety Performance Evaluation

10.1 General Evaluation of Contractor Health and Safety Performance

Periodically, and consistent with the owner's internal procedures, owners shall review and evaluate ongoing health and safety performance of contractors who work on-site. These audits and reviews may include, but are not limited to the following:

- informal job-site reviews (discussed in 9.3.1.1);
- formal periodic health and safety inspections (discussed in 9.3.1.2);
- evaluation of contractor performance; and
- re-evaluation of owner's approved contractor list.

Evaluations of contractor health and safety performance are based on the duration of the project, the level of risk for the type of work being performed, and the health and safety performance of the contractor over the period of performance. The evaluation may be done at the completion of a job, the expiration of a contract, or periodically during the job. If the contractor has a division or corporate health and safety group, joint evaluations by owner and contractor may be considered.

10.2 Joint Evaluation of Contractor Health and Safety Performance

The owner and contractor shall meet periodically to review, discuss, and evaluate contractor health and safety performance. Contractors are generally represented by a senior representative at the site unless the contract or pre-job agreement specifies otherwise. Topics addressed may include, but are not limited to the following:

- health and safety performance;
- accident and incident report summary;
- owner and contractor inspections;
- health and safety issues;
- training conducted, level of detail and documentation; and
- contractor's performance regarding PSM requirements (if applicable).

Each completed contractor project shall be reviewed for the quality of the work, adherence to the schedule and cost, and effectiveness of the contractor's safety program. This overall assessment shall be used by the owner in managing its approved contractor lists. Contractors that have demonstrated a higher sustained level of safety performance and have achieved the safety goals established by the owner should be considered for inclusion in these lists. Contractors shall be aware that they shall be held accountable for safety performance.

If the contractor based on the owner's work site inspections and evaluations of the contractor's health and safety performance does not meet the owner's expectations and requirements, a meeting may provide the contractor an opportunity to discuss the issues and develop corrective action. In appropriate cases, consistent with contractual provisions, the owner may determine that the contract or work should be terminated. Annex J contains sample health and safety performance evaluation forms.

10.2.1 Long-term Contractors

A long-term (or “permanent”) contractor working in the facility on a routine basis shall normally be evaluated annually. In circumstances where safety performance warrants these evaluations shall be conducted more frequently. The owner shall consider specific protocols for this evaluation and provide the results to the contractor who shall develop and implement a corrective action plan, if necessary.

10.2.2 Short-term Contractors

Short-term contractors generally fall into two categories:

- those who perform a single job and do not return; and
- those who do short-term jobs periodically throughout the year.

Short-term “job-specific” contractors who are expected to fulfill only one contract shall be evaluated at the end of that contract. A short-term “temporary” contractor who performs and fulfills several small contracts on a recurring basis throughout a year shall be evaluated on a periodic basis (for example, annually or after every third contract). The sample health and safety performance evaluation form in Annex J provides guidance to the type of information to consider during evaluation.

10.3 Periodic Evaluation of Owner’s Approved Contractor List

The owner shall update its approved contractor list on a regular basis. Since the number of contractors on the approved list could be substantial, two approaches are suggested.

- The first approach is contractor submission and owner evaluation of an updated PQF to determine if the contractor still meets health and safety criteria. This occurs at least once every three years.
- The second approach is to use a satisfactory evaluation of contractor health and safety performance as the basis for remaining on the owner’s approved contractors list.

Annex A (informative)

Sample Contractor Health and Safety Policy Statement

Purpose: Annex A provides a sample contractor health and safety policy statement, which can be modified for your facility.

When to Use: To establish top management commitment to contractor.

Who Uses: Owner's management.

Example Owner Contractor Health and Safety Policy Statement

This policy establishes requirements for contract administration and oversight of contractor health and safety activities at the owner's facility. Implementation of this policy is to be consistent with the company's continuing commitment to safety, health and protection of the environment. The contractor health and safety policy has the following purposes:

- to formally establish specific elements of a contractor health and safety program to enhance the overall safety of contractor personnel and owner employees and property;
- to establish an understanding of the minimum requirements that shall be expected and required of the contractor;
- to set forth security requirements to exclude contract companies and contract employees that have been expelled for reasons of poor safety performance or inadequate qualifications;
- to enhance existing procedures for bidding, evaluating, and awarding contracts;
- to approve only qualified and safe contractors;
- to formalize training and communications programs to provide adequate instruction and coordination prior to and during the job; and
- to incorporate formal audit procedures to monitor and evaluate contractor performance.

Contractors are expected to provide their employees (and their subcontractors) with a level of health and safety protection equivalent to that which would be provided to owner employees. Strong, consistent management of all elements associated with contracted work and services shall enhance the health and safety protection provided to our employees, our contractors, and our neighbors.

If you have any questions regarding this policy or its implementation, please contact:

Name: _____

Title: _____

Annex B
(informative)

Sample Pre-qualification Form

Health, Safety and Environmental Questionnaire

EXHIBIT A

Date: _____

Company Name: _____ Form Completed By: _____

Address: _____ E-mail Address: _____

City, State and Zip Code: _____ Federal Tax ID #: _____

Company Contact: _____ Type of Work Code(s): _____

Telephone #: (____) _____ List Work Codes Here: _____

FAX #: (____) _____

E-mail Address: _____

Operator Requesting Audit:

Name of Company (add business unit here)

Please describe the services that your company provides (BE SURE TO ALSO ENTER THE TYPE OF WORK CODE ABOVE): _____

The information requested below must be for the entire company. The operator may request individual data at another time.

1. In the table below, provide the three most recent full years of incident information for your company. Send OSHA 200 or 300 logs and proof of EMR verification from your insurance carrier.

Year (A)	Avg. Number of Employee (B)	Exposure or Employee Hours (C)	Number of Recordable Cases (D)	Incident Rate of Recordable Cases (E)	Number of Days Away Cases (F)	Incidence Rate of Days Away Cases (G)	Number of Days Away (H)	Severity Rate (I)	EMR (must be verifiable) (J)	Number of Fatalities (K)	Vehicle Accident Rate (L)

2. Specify the basis for **exposure or employee hours** (for example, 8-hour, 12-hour or 24-hour shifts. _____

3. What is your company's NAICS and SIC Code? _____

Guidance in Filling Out the Table:

(A) Year: List the three most recent full calendar years. If less than a year, please specify months.

(B) Average Number of Employees: List the average number of employees who worked during the year. An employee shall be defined as any person engaged in activities for an employer from whom direct payment for services is received. Include working owners and officers.

(C) Exposure or Employee Hours: List the total number of hours worked during the year by all employees, including those in operating, production, maintenance, transportation, clerical, administrative, sales and all other activities.

(D) Number of Recordable Cases: List the total number of recordable cases that occurred in that year. Recordable cases are any work-related injury case requiring more than first-aid and all occupational illnesses. Recordable cases include: all occupational illnesses and all occupational injuries resulting in lost workdays either days away from work or days of restricted work activity, medical treatment other than first aid, loss of consciousness, restriction of work or motion, temporary or permanent transfer or the termination of an injured or ill employee.

(E) Incidence Rate of Recordable Cases: =
$$\frac{\text{Number of Recordable Cases} \times 200,000}{\text{Exposure or Employee Hours}}$$

(F) Number of Days Away Cases: List the total number of days away cases that occurred during the year. A days away case shall be defined as any recordable case that results in death or lost workdays with days away from work.

For the purpose of this questionnaire, recordable cases that result in lost workdays with restricted activity shall not be added in this column. Only recordable cases that result in one or more days away from work shall be counted.

(G) Incidence Rate of Days Away Cases: =
$$\frac{\text{Number of Days Away Cases} \times 200,000}{\text{Exposure or Employee Hours}}$$

(H) Number of Lost Workdays: List the total number of days away experienced by all employees during the year. For the purposes of this questionnaire, days away with restricted activity should not be added in this column. Only recordable cases that result in one or more days away from work shall be counted. Remember to subtract the employee's normally scheduled "Days-off" from the number of days away from work!

(I) Severity Rate: =
$$\frac{\text{Total Number of Lost Workdays} \times 200,000}{\text{Exposure or Employee Hours}}$$

(J) EMR—Experience Modification Rate: We require verification for the EMR and discount rate data requested in the questionnaire. Any of the following methods shall be acceptable:

- a letter from your insurance agent, insurance carrier, or state fund (on their letterhead), verifying the EMR or discount rate listed above.
- a copy of the last three years experience rating calculations sheets, which your insurance carrier should forward to you annually.
- a copy of the page of your last three years insurance policies that show the modification rate and the coverage period.

(K) Number of Fatalities: List the total number of fatalities that result from occupational injuries or illnesses. Deaths that occur in the workplace but are not the result of occupational injuries shall not be included.

(L) Vehicle Accident Rate: =
$$\frac{\text{Total Vehicle Accidents} \times 1,000,000}{\text{Total Miles Driven}}$$

Additional Information: Additional information concerning injury and illness record keeping can be found in 29 CFR 1904 and OSHA'S "Recordkeeping Guidelines for Occupational Injuries and Illness" booklet.

4. If your company is self insured, what is your discount rate?

5. Has your company received any inspections from a regulatory agency during the last three years?

☐ YES ☐ NO If yes, please provide details: _____

6. Has your company received any citations from a regulatory agency during the last three years?

☐ YES ☐ NO If yes, please provide details: _____

7. Are all documents pertaining to this questionnaire available for auditing?

☐ YES ☐ NO If no, please provide details: _____

8. Does your company comply with either the process safety management provisions found in 29 CFR 1910.119 or the API RP 2220, or both?

☐ YES ☐ NO Comments: _____

9. Does your company have scheduled, documented employee safety meetings?

☐ YES ☐ NO If yes, how often? _____

10. Who conducts the safety meetings? _____ Job Title: _____

11. Which managers and supervisors participates in the safety meetings? Job Titles: _____

12. Are meetings reviewed and critiqued by managers and supervisors? ☐ YES ☐ NO

13. What were the dates and discussion topics of the last meetings?

Date: _____ Topic: _____

Date: _____ Topic: _____

14. Does your company hold on-site (tailgate, toolbox and pre-tour) safety meetings?

☐ YES ☐ NO If yes, how often? _____

15. Who conducts the safety meetings? Job Title: _____

Is documentation available? ☐ YES ☐ NO

16. Does your company perform job safety analysis (JSA)? ☐ YES ☐ NO

17. Does your company perform equipment checks on all equipment? ☐ YES ☐ NO ☐ Not Applicable

If yes, are records available and maintained? ☐ YES ☐ NO ☐ Not Applicable

18. Does your company provide or require the following Personal Protective Equipment:

Personal Protective Equipment	Company Provided			Company Required	
	N/A	YES	NO	YES	NO
Hard Hats (ANSI-Z89.1) (29 CFR 1910.135)					
Safety Shoes (ANSI-Z41.1) (29 CFR 1910.136)					
Eye Protection (ANSI-Z87.1) (29 CFR 1910.133)					
Hand Protection (29 CFR 1910.132)					
Hearing Protection (29 CFR 1910.95)					
Fall Protection (29 CFR 1910.129)					
Respiratory Protection (29 CFR 1910.134)					
Personal Flotation Devices (33 CFR 142.45)					
Flame Retardant Clothing					

19. In addition to regulatory required Personal Protective Equipment, what other PPE is required or supplied?

If any, please describe or list: _____

20. Does your company have a written policy regarding either alcohol or drug screening and testing (or both) for your employees?

☐ YES ☐ NO Comments: _____

21. Does your alcohol and drug testing program conform to DOT requirements?

☐ YES ☐ NO ☐ Not Applicable Comments: _____

22. If yes, which set of DOT regulations is your alcohol and drug testing program designed to satisfy?

	YES	NO
Federal Aviation Administration (FAA)		
United States Coast Guard (USCG)		
Research and Special Programs Administration (RSPA)		
Federal Railroad Administration (FRA)		
Federal Highway Administration (FHWA)		

23. Indicate the circumstances in which your company's employees may be subject to alcohol and drug screening.

☐ Pre-employment ☐ Reasonable Cause and Suspicion ☐ Periodic ☐ Follow Up

☐ Random ☐ Post Accident ☐ Return to Duty ☐ Other: _____

24. Does your company have a written policy that describes roles and responsibilities that shall be initiated in the event of an accident? ☐ YES ☐ NO

25. Does your company have a written policy requiring written accidents and incident reports (spills, injury and property damage)? ☐ YES ☐ NO

26. Does your company conduct accident and incident investigations? ☐ YES ☐ NO

27. Does your company document, investigate and discuss near-miss accidents? ☐ YES ☐ NO

If yes, is documentation available? ☐ YES ☐ NO

28. Does your company require an authorized individual to accompany injured employees to the medical provider for initial treatment? ☐ YES ☐ NO

29. Are accident and incident reports reviewed by managers and supervisors? ☐ YES ☐ NO

30. Does your company use subcontractors? ☐ YES ☐ NO

If yes, please explain: _____

31. Does your company review the safety procedure of subcontractors? ☐ YES ☐ NO

32. Does your company verify that subcontractors meet or exceed your safety and training requirements?

☐ YES ☐ NO If no, please explain: _____

33. Please respond to all items with YES, NO or N/A. Do not leave any items unanswered. (Estimated percentage of employees should reflect the percentage of employees who are required to have the training—NOT the percentage of the total number of employees in your organization.)

34. Please provide any additional information on other industry-specific programs or training, including written procedures that your company provides to employees: _____

35. Describe the programs utilized to monitor the safety performance of your company to determine progress (for example, management meetings, safety committee and team and statistical reports).

Programs and Training	Reference Source	Program Documented and Written YES/NO/NA	Estimated Percentage of Employees Receiving Training	Training Provided By	Frequency of Training for Individual Employees	Individual Employee Training Documented YES/NO/NA
Asbestos Management and Maintenance Work	OSHA 1910.1001					
Benzene Chemical Exposure	OSHA 1910.1028					
Bloodborne Pathogens	OSHA 1910.1030					
Confined Space—Entrant Level	OSHA 1910.146					
Confined Space—Attendant Level						
Confined Space—Supervisor Level						
Confined Space—Rescuer						
Disciplinary Program	SPEC. PROG. (NO REF)					
Diving	OSHA 1910.410 and 420					
Electrical Safety (Qualified)	OSHA 1910.332 and 333					
Electrical Safety (Non-qualified)	OSHA 1910.332 and 333					
Fire Protection	OSHA 1910.157 and 1926.150					
Fall Protection	OSHA 1926.501, 502, 503					
First Aid and CPR	OSHA 1926.50					
Forklift	OSHA 1910.178					
Ground Fault Protection	OSHA 1926.404					
H2S Specific Training	MMS 30 CFR 250.67					
HazCom	OSHA 1910.1200(H)					
Hazwoper and Emergency Response	OSHA 1910.120					
Hazwoper—Awareness Level						
Hazwoper—8 Hour						
Hazwoper—24 Hour						
Hazwoper—40 Hour						
Hazwoper—Supervisor 8 Hour						
Hazwoper and RCRA	OSHA 1910.120					
Lead, Cadmium, Metals Exposure	OSHA 1910.1025, 1027					
Lifting and Mobile Equipment	OSHA 1910.179, 180, 181					

Programs and Training	Reference Source	Program Documented and Written YES/NO/NA	Estimated Percentage of Employees Receiving Training	Training Provided By	Frequency of Training for Individual Employees	Individual Employee Training Documented YES/NO/NA
Lockout and Tagout—Authorized Person	OSHA 1910.147					
Lockout and Tagout—Affected Person						
Lockout and Tagout—Other						
Noise—Hearing Conservation	OSHA 1910.95					
NORM—Naturally Occurring Radio-active Materials	SPECIAL PROGRAM					
Personal Protective Equipment	OSHA 1910.132					
Process Safety Management	OSHA 1910.119					
Respiratory Protection	OSHA 1910.134					
Sandblasting	NIOSH PUB. 92.102					
Scaffold (User)	OSHA 1926.454					
Trenching and Shoring	OSHA 1926.651, 652					
Water Survival	API TI 3 and Y					
Welding, Cutting and Hot Work	OSHA 1910.252,253, 254					
Craft Skills Training	OSHA 29 CFR 1910.119					
Additional Training (Please List)						

36. Does your company have a safety manual with a clearly written safety policy that is endorsed by upper management? ☐ YES ☐ NO comments: _____

37. Does your company have a Short Service Employee (SSE) policy that identifies new employees or experienced employees new to your company or new to their position? ☐ YES ☐ NO

If yes, does your SSE policy include a means to visually identify a SSE? ☐ YES ☐ NO

38. Does your SSE policy include a mentor being assigned to the SSE? ☐ YES ☐ NO

If yes, does it define the roles and responsibility of the mentor? ☐ YES ☐ NO

39. Does your company have a behavioral based safety program in place? ☐ YES ☐ NO

40. Do all employee participate in documented behavior observations? ☐ YES ☐ NO

41. Does your company perform safety audits and reviews? ☐ YES ☐ NO

If yes, are safety audits documented? ☐ YES ☐ NO

42. Who reviews the safety audit and review and how often? Job Title: _____

Comments: _____

43. Does your company involve its employees in Health, Safety and Environmental Awareness Programs?

☐ YES ☐ NO If yes, describe how they are involved: _____

44. Who in your company is responsible for coordinating your health, safety and environmental program?

Job Title: _____

45. Is safety a full time responsibility for this position? ☐ YES ☐ NO

If no, list percentage of time that is devoted to safety: _____

46. Does your company have a written environmental program? ☐ YES ☐ NO

If yes, please describe the training and documentation aspects of the program:

47. Is your company required to have any federal, state or local licenses or permits to perform your service(s)?

For example, NORM, Asbestos and DOT? ☐ YES ☐ NO

List type of licenses and permits:

List state of issue:

_____	_____
_____	_____
_____	_____

48. After completing this survey, do you have any additional comments or questions to discuss?

Your signature below shall serve as certification that our operator clients can have access to property and data generated from the records related to your health and safety program.

Company Name:

Date:

Name (Type or Print):

Signature:

1.	How many years has your organization been in business under your present firm name?			
2.	Parent and Subsidiary Company Names and Locations:	State	Zip Code	SIC Code
	Parent Company:			
	Subsidiary Companies:			
3.	Under Current Management Since (Date):			
4.	Name of Contact for Insurance Information:			
	Title:	Telephone:	FAX:	E-mail:

5.	Describe Services Performed:		SIC Code:	
	<input type="checkbox"/> Construction		<input type="checkbox"/> Original Equipment Manufacturer and Maintenance	
	<input type="checkbox"/> Construction Design		<input type="checkbox"/> Service work (for example, janitorial and clerical)	
	<input type="checkbox"/> Construction Design		<input type="checkbox"/> Manpower and Resource	
	<input type="checkbox"/> Project Maintenance		<input type="checkbox"/> Other	
	<input type="checkbox"/> Maintenance			
6.	Describe Additional Services Performed:			
7.	List other types of work within the services you normally perform that you subcontract to others:			
8.	Attach a list of major equipment (for example, cranes, JLGs and forklifts) your company has available for work at this facility and the method of establishing competency to operate.			
9.	Do you normally employ? <input type="checkbox"/> Union Personnel <input type="checkbox"/> Non-union Personnel			
	If union, list trades and locals:			
10.	Annual Dollar Volume for the Past 3 Years:	Year \$	Year \$	Year \$
11.	Largest Job During the Last 3 Years:	\$		
12.	Your Firm's Desired Project Size:	Maximum: \$	Minimum: \$	
13.	Financial Rating:	D and B: \$	Net Worth: \$	

14.	Major jobs in progress:				
	Customer and Location	Type of Work	Size \$M	Customer Contact Name	Telephone
15.	Major jobs completed in the past 3 years:				
	Customer and Location	Type of Work	Size \$M	Customer Contact Name	Telephone
16.	Are there any judgments, claims or suits pending or outstanding against your company? <input type="checkbox"/> Yes <input type="checkbox"/> No				
	If yes, please attach details.				
17.	Are you now or have you ever been involved in any bankruptcy or reorganization proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No				
	If yes, please attach details.				

18.	Name of highest ranking safety and health professional in the company:		
	Title:	Telephone:	FAX:
19.	Do you have or provide:		
	a. Full Time Safety and Health Director	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	b. Full Time Site Safety and Health Supervisor	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	c. Full Time Job Safety and Health Coordinator	<input type="checkbox"/> Yes	<input type="checkbox"/> No
20.	Do you have or provide:		
	d. Safety and health Incentive Program	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	e. Company Paid Safety and Health Training	<input type="checkbox"/> Yes	<input type="checkbox"/> No
21.	Do your employees read, write and understand English such that they can perform their job tasks safely without an interpreter?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	If no, provide a description of your plan to ensure that they can safely perform their jobs.		
22.	Equipment and Materials:		<input type="checkbox"/> Yes <input type="checkbox"/> No
	a. Do you have a system for establishing applicable health, safety and environmental specifications for acquisition of materials and equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	b. Do you conduct inspections on operating equipment (for example, cranes, forklifts and JLGs) in compliance with regulatory requirements?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	c. Do you maintain operating equipment in compliance with regulatory requirements?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	d. Do you maintain the applicable inspection and maintenance certification records for operating equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No
23.	Subcontractors:		
	a. Do you use health and safety performance criteria in selection of subcontractors?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	b. Do you evaluate the ability of subcontractors to comply with applicable health and safety requirements as part of the selection process?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	c. Do your subcontractors have a written health and safety program?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	d. Do you include your contractors in:		
	— health and safety orientation,		<input type="checkbox"/> Yes <input type="checkbox"/> No
	— health and safety meetings,		<input type="checkbox"/> Yes <input type="checkbox"/> No
	— inspections, and		<input type="checkbox"/> Yes <input type="checkbox"/> No
	— audits.		<input type="checkbox"/> Yes <input type="checkbox"/> No
24.	Inspections and Audits:		
	a. Do you conduct health and safety inspections?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	b. Do you conduct health and safety program audits?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	c. Are corrections of deficiencies documented?		<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Craft Training:		
	a. Have employees been trained in appropriate job skills?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	b. Are employees job skills certified where required by regulatory or industry consensus standards?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	c. List crafts that have been certified:		
26.	Health and Safety Orientation	New Hires	Supervisors
	a. Do you have a health and safety orientation program for new hires and newly hired or promoted supervisors?		<input type="checkbox"/> Yes <input type="checkbox"/> No
	b. Does program provide instruction on the following:		
	— New Worker Orientation	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

	— Safe Work Practices	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	— Safety Supervision	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	— Toolbox Meetings	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	— Emergency Procedures	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	— First Aid Procedures	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	— Incident Investigation	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	— Fire Protection and Prevention	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	— Safety Intervention	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	— Hazard Communication	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. How long is the orientation program?		Number of Hours: _____	
27.	Health and Safety Training:		
	a. Do you know the regulatory health and safety training requirements for your employees?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	b. Have your employees received the required health and safety training and retraining?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	c. Do you have a specific health and safety training program for supervisors?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
28.	Training Records:		
	a. Do you have health and safety and crafts training records for your employees?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	b. Do the training records include the following:		
	— Employee identification	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	— Date of training	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	— Name of trainer	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	— Method used to verify understanding	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Health and Safety Programs and Procedures

Information Submittal

Please provide copies of marked (X) item with the completed PQF:

- | | |
|--|---|
| <input type="checkbox"/> EMR documentation from your insurance carrier | <input type="checkbox"/> Accident and Incident Investigation Procedure |
| <input type="checkbox"/> Insurance Certificate(s) | <input type="checkbox"/> Unsafe Condition Reporting Procedure |
| <input type="checkbox"/> Health and Safety Program | <input type="checkbox"/> Health and Safety Inspection Form |
| <input type="checkbox"/> Health and Safety Incentive Program | <input type="checkbox"/> Health and Safety Audit Procedure or Form |
| <input type="checkbox"/> Substance Abuse Program | <input type="checkbox"/> Health and Safety Orientation Outline |
| <input type="checkbox"/> Hazard Communication Program | <input type="checkbox"/> Health and Safety Training Program (Outline) |
| <input type="checkbox"/> Respiratory Protection Program | <input type="checkbox"/> Example of Employee Health and Safety Training Records |
| <input type="checkbox"/> Industrial Hygiene Monitoring Program | <input type="checkbox"/> Health and Safety Training Schedule (Sample) |
| <input type="checkbox"/> Housekeeping Policy | <input type="checkbox"/> Health and Safety Training for Supervisors (Outline) |

NOTE Owner checks items to be provided with PQF.

Annex C (informative)

Sample Cover Letter for Pre-qualification Form (PQF)

Purpose: Annex C provides a sample cover letter for a PQF that highlights an owner's safety requirements and objectives.

When to Use: To accompany the Pre-qualification Form.

Who Uses: Owner

Date: _____

Company: ABC Contractor

Subject: Contractor Pre-qualification Form (PQF)

Company XYZ is committed to maintaining a safe workplace for employees, contractors, and neighbors that is in compliance with federal, state and local safety standards. Only those contractors who have demonstrated management leadership and systems resulting in superior health and safety performance are included on the approved contractors list. Your completion of the attached evaluation shall document the existence and current scope of your Health and Safety Programs and shall be utilized by Company XYZ, in its contractor safety qualification process and consideration for our approved contractor list.

To qualify to perform on-site work for Company XYZ, contractors must:

- have a documented health and safety program requirements applicable to your work;
- have an OSHA Recordable Injury and Illness Rate equal or less than the following: (to be added by the company pre-qualifying contractors.);
- have a Workers Compensation Experience Modification Rate (EMR) equal or less than the following: (To be added by the company pre-qualifying contractors.);
- have an OSHA Days Away Case Injury and Illness Rate equal or less than the following: (To be added by the company pre-qualifying contractors.);
- have a program for compliance with applicable PSM requirements on contracts; and

NOTE Only for covered processes.

- agree that any subcontractors utilized shall meet the requirements listed above.

Your completion and return of the enclosed Acknowledgement Document and Pre-qualification Form is greatly appreciated. Should you have any questions concerning this request, please do not hesitate to call.

Sincerely,

Name: _____

Address: _____

Phone: _____

XYZ Company Representative

Sample Acknowledgement of Safety Qualification Packet

(Packet Issue Date: _____)

Please Complete and Return this Acknowledgement Form within 14 Days to (Name of Company).

Name and Address of Company:

_____	Date Packet Received: _____
_____	Primary Contact: _____
_____	Telephone Number: _____
_____	E-mail Address: _____

Expected Date of Submittal of All Requested Information to (Name of Company):

If Unable or not Intending to Complete All Requested Information, Please Advise and State Reason(s):

Return this Acknowledgement Form within 14 Days to:

Company Name:
ATTN: XXX
(Address)
(City, State, Zip)

For Questions, contact (add contact name here) at (XXX) XXX-XXXX.

Annex D (informative)

Sample PQF Evaluation Form

Purpose: Annex D illustrates a method for evaluating the Pre-qualification Form (PQF) submitted by contractors. The facility first establishes “Acceptance Criteria” and then evaluates the PQF using those criteria.

When to Use: When evaluating a contractor.

Who Uses: Owner

Table D.1—Example of an Acceptance Criteria Chart

Type of Work	Acceptance Criteria							
	EMR Less Than or Equal to	Lost Workday Cases Days Away from Work	Recordable Injury and Illness Rate	Fatalities	Vehicle Accident Rate	PSM Qualified	Substance Abuse	Written Health and Safety Program
		Per 200,000 Hours Worked						
Operational, Maintenance, and Construction Personnel								
Operating Services								
Distribution								
Technical and Administration Site Services								
Grass Root Construction								

Table D.2—Sample Contractor Pre-qualification Evaluation Form

Contractor Pre-qualification Evaluation		Health and Safety Performance		
Health and Safety Criteria		Acceptable	Needs Improvement	Not Acceptable
OSHA Recordable Injuries and Illness Rate				
OSHA Days Away Case Injury and Illness Rate				
Fatality and Serious Incident Experience				
EMR				
Regulatory Agency Citations				
Vehicle Accident Rates				
Health and Safety Management Program				
Health and Safety Commitment and Perceived Attitude				
Health and Safety Staff				
Written Health and Safety Program				
Health and Safety Practices and Procedures				
Medical Program				
Substance Abuse Program				
Health and Safety Meetings				
Subcontractors				
Inspections and Audits				
PSM Compliance Program				

Contractor is:		
Acceptable for Approved Contractor List	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Conditionally Acceptable for Approved Contractor List ("conditional approval" should be reviewed by Safety and signed off by Plant Manager or equivalent)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Conditions: <hr/> <hr/>		
Not Acceptable for Approved Contractor List	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Feedback provided to contractor on:		
Reviewer:	Date:	
Approved By:	Date:	

Annex E (informative)

Sample Regulatory Requirements for Selected Work Activities

Table E.1—Work Activities, Resources and Regulations

Work Activity	Consensus Standard*	Regulation*
Abrasive Blasting	API RP 2027	OSHA 1910; 1926
Asbestos Removal		Both OSHA and EPA Requirements Apply—May Include IH Monitoring
Confined Space Entry	ANSI Z117; API	OSHA 1910.146
Equipment Grounding		OSHA 1910; 1926
Emergency Response	NFPA	Several OSHA Requirements Apply—1910.38; 1910.120; 1910.156
Excavating, Trenching and Shoring Exposure Assessment		(Specific OSHA Requirements Apply)
Fall Protection	ANSI	OSHA
Fire Prevention	NFPA	OSHA
Forklift and Crane Operations		OSHA
Hazard Communication	ANSI Z400	OSHA 1910.1200
Hotwork and Welding	API 2009, NFPA	OSHA
Accident and Incident Investigation		OSHA 1910.119, EPA RMP
Inspections (for example, Personal Protective Equipment, Tools, Mobile Equipment and Ladders)		OSHA
Lead Abatement		(OSHA and Probably EPA)
Line Breaking		
Medical (for example, Examinations, Surveillance and Emergency Treatment)		(OSHA—Numerous)
Orientation		OSHA PSM
Personal Protective Equipment		OSHA 1910.132
Respiratory Protection	ANSI Z88	OSHA 1910.134
Safety Awareness		
Health and Safety Training		OSHA
Safety Meetings		
Scaffolding (OSHA)	ANSI	OSHA
Warning Signs, Signal and Barricades	ANSI, NFPA	OSHA
Work Permits	API	OSHA

* This listing gives only examples of activities and some regulations that relate. It is not a compliance guide; therefore, the absence of a listed reference does not imply that one does not exist.

Table E.2—Possible PSM and RMP Owner and Contractor Responsibilities

PSM and RMP	Owner Responsibilities	Contractor Responsibilities
Overview of the process and hazards associated with the process.	Provide to contractor.	Provide to each employee and subcontractors.
Develop safe work practices.	Identify the safe work practices contractor needs to follow.	Follow agreed upon safe work practices.
Obtain and evaluate contractors health and safety performance.	See Annex A on pre-qualification.	Submit information requested for pre-qualification.
Emergency Response Plan.	Explain applicable sections of Emergency Response Plan to contractor and document.	Train employees and subcontractors on applicable section of Emergency Response Plan and document.
Entry into PSM “covered process units”.	Develop procedures for access of contractors while in covered units.	Train employees and subcontractors in access procedures.
Conduct periodic evaluation of contractors health and safety performance and PSM requirements.	Develop procedures, conduct evaluations, and provide feedback on contractor’s health and safety performance to responsible contracting representative.	Develop procedures, conduct evaluations, and provide feedback on subcontractor’s health and safety performance.
Injury and illness information log.	Collect OSHA injury and illness information for all covered contractors.	Provide OSHA injury and illness information to owner.
Employees trained to safely perform job (job skills).	Verify contractor training documentation.	Train employees and verify that training has been completed.
Training (health and safety).	Verify contractor training documentation.	Document training completed and verify understanding of training.
Ensure employees follow safe work practices.	Periodic review either by field inspection or audits (or both).	Periodic review either by field inspection or audits (or both).
Identification of unique hazards.	Notify contractor in writing of hazards.	Notify owner prior to startup or when identified.
Access to information.	Identify means for contractor employees to access PHA and all other relevant process safety information.	Provide information to employees and access to owner’s relevant PSM information.
Solicitation of concerns.	Establish a method of soliciting and responding to contractor employee process safety concerns.	Implement a system whereby employees can notify owner and contractor of process safety concerns.
Accident and incident investigation.	Participate, as appropriate, in contractor accident and incident investigations. Communicate applicable results of accident and incident investigations to affected contractors.	Conduct investigations on contractor accident and incidents and provide results to owner. Participate in applicable accident and incident investigations when a contractor employee is involved.

NOTE Table E-2 is not intended to add, delete, or be a comprehensive representation of the OSHA PSM or EPA RMP requirements for contractors.

Annex F **(normative)**

Contractor Health and Safety Training

Contractor Health and Safety Training Criteria

Purpose

The purpose for establishing criteria for contractor health and safety training is to protect company and contractor personnel and assets, the environment and the community through understanding job requirements and how to implement them. In some cases, this includes regulatory mandates as well as meeting job performance and skill requirements. Since the nature of work performed by contractors can vary greatly (for example, construction, maintenance and specialty service), the training criteria should be customized to suit the owner or contractor requirements. Annex F defines the elements to be considered for developing basic contractor safety training programs customized to suit individual organization needs. Each owner and contractor retains responsibility for reviewing their own particular work environment to ensure that their training program meets all performance and regulatory requirements.

Training Requirements

Contractor Safety Training is to be taken on a periodic basis prior to working at process operations and construction sites. Although some sites may require additional training, the Basic Contractor Safety Training is intended to provide:

- a) the basics for protecting contractor personnel, and
- b) compliance with U.S. regulations relating to contractor safety.

The following outlines the Training Requirements for contractor personnel:

1. Attend Contractor Safety Training prior to accepting an assignment to work at a petroleum or petrochemical industry facility.

- The training provided is outlined in section titled “Training Contents” below.
- Contact your Supervisor to arrange for attending a class at a Regional Safety Council or other training facility that offers contractor safety training that complies with this criteria document.

2. Attend general contractor safety refresher classes every three years.

3. Special Training and Medical Surveillance Programs.

These programs shall satisfy owner, contractor, craft or regulatory requirements. Examples are crane operators, rescue and fire brigade personnel, respirator users and code welders.

4. Obtain the Contractor Safety Training card that is issued after successful completion of the full Contractor Safety Training course:

- the provider of the training (or designee) issues cards,
- cards shall list topics included in the course,
- cards are valid for three years, and
- cards shall include a photo.

Classroom or Computer Assisted Training Approach

The following outlines one training approach for the training sessions:

1. Introduction of the topic by the instructor:
 - the introduction shall be presented to provide insight into the subject matter and promote better instructor and attendant interaction.
2. Provision of training material handouts:
 - handouts shall vary by subject.
3. Viewing visual material on the training subjects:
 - subjects shall include a professionally quality video, Power Point or overheads presenting the subject matter.
4. Summarization of the training by instructor:
 - trainer shall summarize the subject,
 - emphasize the important aspects of the subject matter, and
 - in-class demonstrations shall be provided (when applicable).
5. Complete a training subject quiz:
 - each subject shall include a quiz,
 - quizzes may be reviewed and graded in class to explain and discuss the answers, and
 - the objective is to understand 100 % of the material covered in the quiz.

Training Contents

This section details the Training Contents of the Basic Contractor Safety training. This Contractor Safety Training covers 11 subjects covering the contents listed below.

1. Introduction to Contractor Safety

- Overview of the course and the Contractor Safety Program.
- Reasons for Contractor Safety Training:
 - prevention and protection,
 - industry concerns, and
 - government regulations, specifically 29 *CFR* 1910.119(h).
- Medical and Travel Requirements.
- Need for management support.
- Review of a “Contractor Safety” video (or equivalent visual presentation) that provides an overview of contractor safety principles in conformance with OSHA PSM (1910.119[h]) requirements.
- Typical site health and safety rules and programs (Why a contractor should want and need site information?).

- Concepts and importance of work authorization (permit) systems.
- Emergency procedures including Bloodborne Pathogens.
- Hazwoper Awareness.

2. Hazard Communication

- OSHA HazCom:
 - Types of hazards.
 - Routes of entry into the body.
 - Material safety data sheets:
 - required information, and
 - provide and review sample MSDS's.
 - Container labeling, including pictograms.
- EPA TSCA.
- Hazard rating exercise (use of HMIS or NFPA designations).
- Safe Work Practices.
- Optional review of a generic "Hazard Communication" Video.
- Distribution of a "HazCom Glossary" and hazard rating cards is optional.

3. Typical Refinery and Petrochemical Plant Hazards

- Listing of typical hazards in a refinery or petrochemical plant:
 - chemical (H₂S, Chlorine, Ammonia, Benzene and Flammables), and
 - physical (PRVs, furnaces, heaters and heights).
- Review the specific hazards associated with some of the industry's process technologies:
 - Flammables,
 - Asbestos,
 - Benzene,
 - Nitrogen, and
 - Hydrogen Sulfide (H₂S).
- Discuss how to identify the above hazards, using specific examples:
 - see,
 - smell,

- hear, and
- feel.
- Importance of reviewing Technology data sheets and MSDS's for the units where the contractor shall be working.

4. Confined Spaces

- Important aspects of Confined Space Entry:
 - Definition of a Permit Required Confined Space (PCRS), and
 - Confined space hazards:
 - atmospheric conditions, including oxygen content, and
 - physical hazards (for example, falls, burns and engulfment).
 - Entry permit:
 - purpose and elements, and
 - authorizations.
 - Pre-entry procedures:
 - atmospheric testing, including oxygen content, and
 - isolation of the confined space from:
 - energy sources (LO and TO),
 - contaminants (blinding), and
 - personal protective equipment required.
 - Attendant duties:
 - importance of the role.
 - Entry supervisor duties.
 - Contractor procedures:
 - responsibilities of the owner of the site, and
 - responsibilities of the contractor.
 - Rescue procedure:
 - understanding the retrieval system in use at the site.
- Optional review of a generic "Permit Required Confined Space Entry" Video.

5. Lockout and Tagout and Try

- Importance of Lockout and Tagout:
 - differentiating between Lockout and Tagout;
 - prevention of inadvertent activation;
 - types of energy sources; and
 - methods for locking and tagging equipment.
- Function of LO and TO and Try:
 - prevention of energy reaching the equipment being worked on; and
 - try the equipment to ensure energy has been disconnected and stopped.
- Regulatory requirements.
- Contractor role in prevention:
 - typical LO and TO procedures;
 - understanding the procedures used at the customer site; and
 - ask your supervisor (if unsure).
- Special situations that need to be addressed:
 - common use of “hasps” on electrical equipment;
 - chaining valves; and
 - use of “tags” when locks cannot be used.
- Importance of proper removal of Locks and Tags.
- Optional review of a generic “Lockout and Tagout Awareness” Video.

6. Hearing Conservation

- Basic principles of hearing protection.
- Key points on hearing and your safety.
- Regulatory requirements.
- When is noise hazardous? (provide a table of equipment-producing noise levels).
- “Noise Induced Hearing Loss”.
- Other causes of hearing loss.
- Hearing Conservation Program:
 - monitoring,

- hearing tests,
- hearing protection, and
- training.
- Hearing Protection—Three Defenses:
 - engineering controls (always first choice in “hierarchy of control”),
 - administrative controls, and
 - protective hearing equipment:
 - types of protection available, and
 - how to read and use the NRR designations.
- Optional review of a “Hearing Conservation” video.

7. Personal Protective Equipment (PPE)

- Basic philosophy of using PPE.
- Regulatory requirements.
- Evaluating the site for hazards.
- Types of PPE:
 - eye protection,
 - head protection,
 - hearing protection,
 - respiratory protection,
 - protective clothing,
 - hand protection, and
 - foot protection.
- Detailed Information and Examples of Specific Equipment:
 - situations where specific PPE is required,
 - aids to understand the proper selection, use and maintenance of PPE,
 - demonstration of equipment to class, and
 - provide a PPE Summary Sheet.
- Understanding which type of PPE shall protect against the identified hazards.
- Optional review of a generic “Personal Protective Equipment” video.

8. Respiratory Protection

- Regulatory requirements.
- When respirators are needed.
- Types of hazards and proper selection of respirators:
 - protection factors,
 - air purifying for (contaminants in an otherwise breathable atmosphere),
 - proper selection of air-purifying cartridges, and
 - supplied air (for oxygen deficient or high contaminant atmospheres).
- Demonstrate the use, fit checks and maintenance of respirators:
 - impact of facial hair on respirator effectiveness.
- Optional review of a generic “Respiratory Protection” video.

9. Scaffolds

- Common hazards and precautions.
- Scaffold evaluation:
 - what to look for, and
 - reporting potentially unsafe scaffolds.
- Platform construction.
- Optional review of a generic “Scaffolding Safety” video.

10. Fall Protection

- Regulatory requirements.
- Hazard identification.
- Using a Personal Fall Arrest System:
 - how a Fall Arrest System works,
 - body holding device,
 - harnesses versus belts,
 - secure line of safety anchorage and tie-off points, and
 - types of snap-hooks (good and bad).
- Understanding the site fall protection system.
- Harness and lanyard demonstration.

- Inspection and care (and when to dispose of either the harness or lanyard (or both)).
- Optional review of a generic “Fall Protection” video.

11. Reproductive System and Embryo Fetus Protection (Optional)

- Definitions:
 - embryo-fetus,
 - maternal toxicity,
 - reproductive hazards,
 - Teratogen, and
 - Mutagen
- Employee and employer responsibilities.
- Reproductive and Embryo-Fetus Hazards:
 - Lead,
 - Mercury,
 - N-Hexane,
 - Benzene, Toluene and Xylene, and
 - Butadiene.

Course Summary

Table F.1—Sample Contractor Health and Safety Training Matrix Outline*

Courses	Types of Contractor Work					
	Operational, Maintenance and Construction Personnel in Process Units	Operating Services	Distribution	Technical and Administration	Non-process Services	Construction and Maintenance—Greenfield
Introduction to Contractor Safety	X	X	X	X	X	X
Hazard Communication	X	X	X	X	X	X
Emergency Procedures	X	X	X	X	X	X
Medical and First Aid	X	X	X	X	X	X
Refinery and Petrochemical Plant Hazards	X	X	X			X
Fire Training	X		X			X
Hazwoper Awareness	X	X	X			
Office Safety Fire Extinguishers				X	X	
Confined Space Entry	X	X				X
Lockout—Tagout Procedures	X	X	X			X
Hearing Conservation	X	X	X			X
Personal Protective Equipment	X	X	X	X	X	X
Respiratory Protection	X	X				
Fall Protection	X					X
Rigging Safety	X					X
Forklift Operations (if using)	X	X	X			X
Crane Operations	X	X				X
Electrical Safety	X					X
Reproductive System Embryo-Fetus Protection	Potentially Exposed Female Employees	→	→	→	→	X

* Training or education should be provided on the basis of facility requirements and the job activity of the contract personnel.

Annex G (informative)

Sample Site Visit Health and Safety Checklist

Purpose: Annex G provides a sample list of actions that owners and contractors may wish to reference during a pre-bid or pre job-site visit.

When to Use: During site visits.

Who Uses: Owner

Contract No.: _____

Visit Date: _____

	Subjects or Areas Reviewed or Visited	
1.	Site conditions under which the work shall have to be performed.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2.	Access to the project and the work area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3.	Contractor laydown area(s).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.	Location, capacity and details of owner furnished power, water, fuel, and compressed air.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5.	Material handling equipment and procedures.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
6.	Site investigation program (such as borings, samples, test pits, borrow pits and quarries).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
7.	Owner furnished permits and contractor furnished permits.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
8.	Customer and owner furnished facilities and schedule for availability (for example, camp, warehousing, delivery of construction materials or equipment on-site, contractor responsibility for loading, unloading and storing of contractor and owner furnished materials).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
9.	Contractor participation in owner's safety and first aid programs.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
10.	Other work which shall or may be in progress during the term of the contract.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
11.	Scope of work for the contract and any unusual or difficult operations that may be required.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
12.	Point out building sites, access roads, borrow pits, and other important site features.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
13.	Work of a similar nature, if underway on the site, to show the required standard of workmanship.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
14.	Available communications set-up for on-job and external to job.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
15.	Location of disposal areas for cleanup purposes, and cleanup areas where more than one contractor is working.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
16.	Full scope of the project and the facilities yet to be performed that shall have an influence on the work of the contract being bid.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
17.	Who are the owner and contractor contacts for health and safety issues (for example, incident investigation, inspections and performance reporting).	Contractor Owner
Job-site visit participants.		Reviewed By:

cc: Owner Contract File

Annex H (informative)

Sample Contractor Health and Safety Report

Purpose: Annex H provides sample statistical data reports for owners and contractors to use. These forms should be modified to suit individual company requirements.

When to Use: For reporting health and safety performance.

Who Uses: Owner and contractor

Typical Contractor Monthly Accident Data Report

Submission of this report is required by contractors performing work at this facility. Submit a separate report for each contract each month.

Contractor:	_____
Contract Number:	_____
Contractor Representative:	_____
Month and Year:	_____
Total recordable injuries and illnesses for the month:	_____
Total safety meetings for the month:	_____
Total personnel hours worked for the month, thousands:	_____
Total lost workday cases involving "days away from work" for the month:	_____
Total lost workdays away from work for the month:	_____
Total vehicle miles driven for the month (first reference to vehicles):	_____
Spills or releases of material (and what kind of material):	_____
Fires:	_____
Governmental inspections and what governmental organization:	_____

**** Provide detail on all injuries, spills, releases, fires and government inspections. ****

Safety meeting topics for the month included:

Special Achievements During Month: _____

Submitted By: _____

Date Submitted: _____

Contractors Job Injury Report

Year: _____ Contract No(s): _____ Contractor: _____

AFE No(s): _____ Location of Work (for example, Plant, Terminal and Facility): _____

Number of Job Injury Cases	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.	Annual Total
	Month YTD	Month YTD	Month YTD	Month YTD	Month YTD	Month YTD	Month YTD	Month YTD	Month YTD	Month YTD	Month YTD	Month YTD	
First Aid Cases													
Worker's Compensation Cases													
Recordable Cases													
Restricted Duty Cases													
Days Away from Work Cases DA													
Fatalities													
Employee Hours Worked (This Month)													
Employee Hours Worked Year to Date													
Number of Lost Days Away Hours This Month													
Number of Lost Days Away Hours Year to Date													
Recordable Incidence Rate This Month													
Recordable Incidence Rate YTD													
Days Away + Fatalities Incidence Rate This Month													
Days Away + Fatalities Incidence Rate YTD													
Material Spills or Releases													
Fires													

FOOTNOTES:

FIRST AID—all work-related injuries that did not require medical treatment as defined by OSHA. WORKER'S COMPENSATION—all work-related injuries treated either at medical facilities or by a physician (or both) for which claims were submitted. RECORDABLE—all work-related injuries that required medical treatment as defined by OSHA or involved loss of consciousness, restriction of work or motion or transfer to another job. RECORDABLE CASES include all work-related fatalities, diagnosed work-related illnesses, days away from work cases, restricted duty cases, and other recordable cases recorded on the OSHA Form 301.

INCIDENCE RATE (IR) = $\frac{(\text{NO. OF CASES: RECORDABLE OR DA plus fatalities}) \times (200,000)}{(\text{EMPLOYEE HOURS WORKED: MONTHLY OR YTD})}$

NOTE Use Recordable Cases to Determine "Recordable Incidence Rate" and "Days Away From Work" Cases plus fatalities to Determine "Days Away + Fatalities" Incidence Rate.

For material spills, releases or fires attach description of incident.

Annex I (informative)

Sample Job-site Inspection Health and Safety Checklist

Purpose: This type of checklist may be used by both the owner and contractor to conduct and document inspections of the job site while work is in progress. This checklist is provided as an example and should be modified to suit individual company or contractor requirements.

When to Use: When conducting job-site inspections.

Who Uses: Either owner or contractor (or both).

Sample Job-site Inspection Checklist 1

Contractor Safety Inspection Report

Date of Inspection: _____

<p>Instructions:</p> <ol style="list-style-type: none"> 1. Record the description and location of all unsafe conditions, unsafe work practices, safety procedure violations or other concerns or program deficiencies in the appropriate space. 2. Responsibility for corrective action shall be assigned in a review session following each inspection. 3. Corrective action completion dates are reported on the report form prior to distributing the completed report as follows: <ul style="list-style-type: none"> — one copy to the location manager or Contract Coordinator, and — one copy to the Contractor Manager and Supervisor. 	<p>Team Members Name and Company:</p> <div style="border-bottom: 1px solid black; text-align: right; margin-bottom: 5px;">_____(Leader)</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div>
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NOTE Corrective action should be taken “real time” where life safety or serious injury is an issue or concern.

Subject Area	Description and Location of Deficiency	Responsibility for Corrective Action	Date Completed
1. Housekeeping, Fire Protection			
2. Life Critical Procedures (for example, Confined Space Entry, Hazardous Work, Lockout and Tagout)			
3. Personal Protective Equipment			
4. Electrical			
5. Excavations, Trenches, Shoring			
6. Cranes, Machinery, Tools			
7. Scaffolds, Ladders and Fall Protection			
8. Health—Environment			
9. Eyewash and Safety Showers			
10. Miscellaneous (Please Specify)			

Sample Job-Site Inspection Checklist 2

Inspection Subject	Potential Deficiencies	Observation Specifics What was Seen and Where
Housekeeping	Material, tools, equipment improperly stored creating trip hazards. Walkways and aisle ways obstructed. Eating areas unsanitary (food stored in chemical refrigerators). Emergency equipment and electrical switch gear obstructed. Material improperly stacked and stored. Vehicles used by personnel contain trash and debris. Electrical cords, cables, wires and hoses in walkways and on floor in work areas. Oil, grease and water creating slipping hazards. Flammable waste not placed in acceptable container. Scrap material not cleared from field work areas.	
Fire Protection	Improper storage of flammable or combustible material. Fire extinguishers not charged, defective and obstructed. Fire extinguisher inspection out-of-date expired. Fire exits and doors obstructed. Fire equipment not accessible. Ignition sources not controlled (for example, classified equipment not used).	
Confined Space Entry	No Vessel Entry Attendant on duty. Permit requirements not completed or approved. Improper, damaged or defective safe equipment on-site. No means of emergency egress. Proper warning sign is not posted. Required equipment not available and not being used properly. Rescue arrangements not in place.	
Hazardous Work Procedures	No Hazardous Work Permit on job site. Improper approval of Hazardous Work Permit. All required precautions on permit were not completed prior to work beginning. Date on Hazardous Work Permit is incorrect. Hazardous Work Permit procedures not complied with (specify).	
Protective Equipment	Employee with no eye protection or improper eye protection. Hard hat not worn when required—overhead hazard exist. Respiratory equipment not worn in high dust area and toxic area. Foot protection not worn when possibility of foot injury. Storage of Personal Protective Equipment improper (for example, not sanitary).	
Electrical	Electrical cords and ground cables worn or defective. Electrical cords obstructing walkways and work areas. Cords and cables found in wet areas. No color coded tape verifying ground fault integrity. Electrical lockout and tagout criteria not observed. Electrical wiring in offices and temporary buildings improperly installed.	

Inspection Subject	Potential Deficiencies	Observation Specifics What was Seen and Where
Excavation	Trenches and excavations not shored or sloped properly. Ladders or means of egress not available every 25 ft. Material not maintained at least 2 ft from edge of excavation. Confined space entry criteria not observed for excavation 4 ft deep or deeper. Underground piping not supported properly. Trench or excavation not barricaded properly.	
Cranes, Hoist and Elevators	Swing radius of cranes not barricaded. Equipment working proximate to energized power lines. Loads being hoisted over personnel. Mechanical hoisting equipment damaged and in need of repair. Unsafe lifting practices. Lifting devices, slings and hooks damaged or defective. Personnel lifting devices not used in accordance with applicable procedures. Equipment being operated by unauthorized personnel.	
Vehicle and Machinery	Vehicles operating at an unsafe speed. Vehicles or machinery in unsafe operating condition. Machinery guards are not in place or not operating properly. Equipment left running without operator in attendance.	
Tools (Hand and Mechanical)	Defective or damaged tools are used. Incorrect tool for the job is being used. Storage of tools improper—could result in damaged tools. Employees using tools on which they are not qualified.	
Scaffold and Ladders	No handrail, midrail and toeboard on scaffold. Improper planking, bracing and overhang. Ladder not up inside of scaffold when scaffold is greater than 16 ft. No caution tags on scaffold being erected or dismantled. Scaffold not secured properly or unstable footing. Scaffold boards not tested recently.	
Fall Protection	Employees exposed to fall while working higher than 10 ft. Safety harness, belt lifeline or lanyard not secured properly. Employees not wearing belts or harness with lifelines attached while in crane. Harness, belts, lifelines and lanyards defective or damaged. Unprotected open sided floor or work platform.	
Health Environment	Excessive dust. Excessive noise. Temperature or hazardous atmosphere. Poor illumination. Unsanitary conditions, working or eating. Improper handling of either hazardous material or waste (or both). Poor ventilation. No barricade to warn persons of health environment (for example, radiation).	
Other (Please Specify)	List any unsafe act, unsafe condition, or procedure violation that is not listed in one of the subject areas above.	

Annex J (informative)

Sample Health and Safety Performance Evaluation Form

Purpose: Annex J provides sample contractor evaluation forms. A company or facility should review this material and modify it to suit their needs. The evaluation table is followed by a table presenting various factors for consideration when completing the contractor health and safety evaluation.

When to Use: When evaluating the performance of a contractor.

Who Uses: Owner

Contractor: _____ Job Title: _____

Contract No.: _____ Location: _____

Date Complete: _____ Evaluated By: _____

Project Description: _____

Type of Contract (check one) ☐ Maintenance Repairs ☐ Construction ☐ Special Repairs ☐ Other

Rate Applicable Categories	<u>POOR</u>			<u>Circle One</u>			<u>EXCELLENT</u>			
SAFETY										
1. Injury and Illness Performance	1	2	3	4	5	6	7	8	9	10
2. Health and Safety Programs	1	2	3	4	5	6	7	8	9	10
3. Adhere to Site Safety and Health Rules	1	2	3	4	5	6	7	8	9	10
4. Housekeeping	1	2	3	4	5	6	7	8	9	10
OPERATIONS										
5. Equipment	1	2	3	4	5	6	7	8	9	10
6. Key Field Personnel	1	2	3	4	5	6	7	8	9	10
7. Execution of Work	1	2	3	4	5	6	7	8	9	10
8. Quality of Craft Labor	1	2	3	4	5	6	7	8	9	10
9. Project Manager	1	2	3	4	5	6	7	8	9	10
10. Cost Within Expectations	1	2	3	4	5	6	7	8	9	10
11. Schedule	1	2	3	4	5	6	7	8	9	10
12. Labor Relations	1	2	3	4	5	6	7	8	9	10
13. Service	1	2	3	4	5	6	7	8	9	10
14. Overall General Performance	1	2	3	4	5	6	7	8	9	10
	<u>NO</u>			<u>Circle One</u>			<u>YES</u>			
Do you recommend contractor for further work?	1	2	3	4	5	6	7	8	9	10

Comments: _____

Considerations for Contractor Performance Evaluation Form

1. Injury and Illness Performance: Number of incidents observed and reported. OSHA 200 Log Summary verification at completion of job. Contractor's participation in accident investigations. Contractor's pre-qualification status.	8. Quality of Craft Labor: Contractor's field personnel. Workmanship. Contractor's ability to obtain qualified personnel.
2. Health and Safety Programs: On-site safety officer. Written safety program. Substance abuse program and testing in place. Safety training for supervision. Weekly toolbox meetings.	9. Project Management: Contractor's efforts to use efficient crew sizes. Control of subcontractors. Use of National Maintenance Agreement.
3. Adhere to Site Safety and Health Rules: Compliance to plant health and safety rules. Adherence to contract provisions for new-hire orientation. Compliance with site permits. Compliance with industrial hygiene requirements. Response to safety requests. MSDS requirements. Compliance with health and safety requirements..	10. Cost Within Expectations: Contractor's cost program. Contractor's reasonableness in extra charges.
4. Housekeeping: Monthly housekeeping inspection results. Overall site housekeeping practices. Response to housekeeping requests.	11. Schedule: Contractor's scheduling techniques. Contractor's adherence to schedule requirements.
5. Equipment: Condition of contractor tools and equipment by site and OSHA standards. Contractor's knowledge and proper use of equipment. Availability of tools and equipment furnished.	12. Labor Relations: Contractor's ability to anticipate problems. Contractor's relationship with building trades. Contractor's efforts in exercising management rights.
6. Key Field Personnel: Quality of first and second line supervision. Competence of main office staff and management.	13. Service: Advises of potential problems. Reliability in dealings. Efficiency in handling paperwork. Readiness to accept responsibility. Response to site requests for action by field supervision at home office management.
7. Execution of Work: Contractor's planning of work. Contractor's cooperation in handling change orders. Contractor's efforts to eliminate non-productive time. Relationship with other site contractors.	14. Overall General Performance: Were there liens filed against the contractor? Did contractor complete the work? Did contractor start and complete work when we wanted?

Annex K (informative)

Sample Owner's Contractor Health and Safety Written Program

Purpose: Annex K provides an example of an owner's contractor health and safety program.

When to Use: To establish program and procedures.

Who Uses: Owner's management

Health, Safety and Environmental Protection—On-site Contractor Health Safety and Environmental Policy Contractor Safety Standard

Standard No.: _____

Page: _____

Revision: _____

Issue Date: _____

K.1 Scope and Field of Application

K.1.1 Scope

This standard defines the management systems that must be in place to protect and promote the health and safety of contractors working for XYZ Company.

K.1.2 Field of Application

This standard applies to all facilities either owned or operated (or both) by XYZ Company.

K.2 References

K.2.1 Laws and Regulations

K.2.1.1 OSHA Hazard Communication Standard—29 *CFR* 1910.1200

K.2.1.2 OSHA Process Safety Management Standard—29 *CFR* 1910.119

K.2.2 Industry References

K.2.2.1 API RP 2220 *Improving Owner and Contractor Safety Performance*

K.2.3 XYZ Corporation Standards

K.2.3.1 Process Safety Management S-201 Corporate Procedure

K.2.3.2 Visitor Orientation S-103 Corporate Procedure

K.3 Definitions

K.3.1 Contractor

General contractors, self-employed contractors, sub-contractors (general or self-employed) working on construction, maintenance and repair, major renovation, turnarounds or specialty services in or around process equipment, laboratories pipelines, terminals and utilities.

NOTE It does not apply to contractors providing incidental services (for example, janitorial work, food and drink services).

K.3.2 Experience Modification Rates

An insurance premium adjustment that anticipates future performances based on past experience.

K.3.3 Prime Contractor

The contractor given the contract by XYZ Company to perform work.

K.4 Program Requirements

K.4.1 Commitment

Continuous improvement in contractor health and safety performance is achieved by establishing and implementing the appropriate management programs for both XYZ and the contractor. The contractor is ultimately responsible for the safety of their employees.

K.4.1.1 Contractors are informed during inquiry about XYZ and facility health and safety requirements. These requirements include, as a minimum, programs focused on:

- health and safety while in the facility,
- contractor employee and contract management communications,
- contractor employee training, and
- monitoring and auditing.

K.4.1.2 Open lines of communications are established with contractor supervision to ensure safe work practices prior to starting actual work.

K.4.1.3 Contracts contain all job-specific health and safety requirements (for example, asbestos contractor to supply all personnel protective equipment).

K.4.1.4 Procedures exist to prevent contractors from working at all company locations should they disregard or ignore health and safety requirements.

K.4.2 Contractor Selection

Contractors are evaluated on their past safety performance and on their actual safety programs prior to selection in order to ensure that they are qualified to work safely.

K.4.2.1 Evaluations should include:

- past experience at XYZ Company locations,

- safe work procedures,
- employee training and documentation,
- safety programs,
- Hazard Communication Program,
- proper health and safety documentation,
- fitness for duty policy,
- accident statistics and incident rates, and
- Experience Modification Rates, where applicable.

K.4.2.2 A record of the criteria used for contractor selection is kept on file by the facility issuing the agreement.

K.4.2.3 The evaluations of each contractor are filed in a designated place and are accessible.

K.4.3 Pre-work Criteria

Safety personnel or contract coordinator ensure site specific health and safety requirements are prepared and communicated to the contractor while discussing job requirements and performance. These requirements are used in the selection process and reviewed with the contractor if the job scope changes.

K.4.3.1 A copy of the written requirements and all addendum are kept with the contract on-site.

K.4.3.2 Contractors are notified that the following requirements need to be completed before starting the job.

K.4.3.2.1 Prime contractors provide a representative responsible for all safety information and activities for each job.

K.4.3.2.2 Contractor employees know how to perform their job tasks and understand the required XYZ safety rules and regulations prior to starting the job. Appropriate documentation of each employee's training is available.

K.4.3.2.3 The contractor provides XYZ with a copy of their written Hazard Communication Program as required by OSHA. MSDS's are made available for any XYZ hazardous substance to which the contractor's employees may be exposed during the performance of their work. Contractor shall supply MSDS's for any substances they bring on-site to which any worker, Contract or XYZ, can be exposed in keeping with right-to-know requirements.

K.4.3.2.4 Where applicable, the contractor has emergency procedures which are consistent with and acknowledged by XYZ.

K.4.3.2.5 Prior to start of contractor work, there is an initial safety meeting with the key contractor management representative, XYZ representative, and contractor safety representative. This orientation should cover topics such as:

- facility safety requirements;
- Hazard Communication Program briefing;
- special hazards of the proposed work and work area;
- the appropriate communication lines between the contractor and representative (contractor is responsible for the safety of his personnel and his subcontract personnel); and
- emergency evaluation signals and routes.

K.4.3.2.6 Prior to the start of contractor work, all contract employees shall attend a safety orientation to ensure understanding of the requirements in 4.3.2.5.

K.4.4 Work Criteria

Contractors perform work according to established work criteria. Work criteria include:

K.4.4.1 XYZ safe work permits are completely prepared and signed before work begins.

K.4.4.2 Written work procedures, where applicable, are provided by the contractor for review by the facility to ensure consistency of application. If unavailable, the contractor may use the site's procedure. These include:

- lockout and tagout,
- confined space entry,
- work permits, including hot work,
- ladders, platforms, scaffolds and man lifts,
- fall protection,
- driver safety,
- railroad safety,
- office safety,
- walking and working surfaces,
- personnel baskets,
- housekeeping,
- vehicle access into controlled areas,
- emergency egress,
- fire protection,
- personal protective equipment,
- mechanical guarding,
- respiratory protection,
- asbestos,
- radiation,
- smoking,
- HazCom (Hazard Communication Programs),
- Hazwoper (Hazardous Waste Operations Training),
- hearing conservation,

- electrical classification,
- random drug testing,
- precaution for shutdown and start-up,
- hot tap procedures and permits (consistent with API RP 2201),
- high explosive permits,
- line and equipment opening procedures and permits,
- excavation and trenching procedures and permits,
- safety work order procedures,
- Toxic Substance Control Act (TSCA) Sections 8(c) and 8(e),
- fork lift driver safety (where appropriate),
- emergency response and evacuation,
- precaution for population control during hazardous operations,
- waste disposal procedures,
- back injury prevention,
- laboratory safety,
- hand tool,
- supervisory and employee safety training,
- road barricades,
- electrical equipment grounding,
- lift plans,
- electrical manway entry, and
- industrial hygiene monitoring.

K.4.4.3 Contractor employees frequently discuss health and safety issues, if appropriate, on a daily basis. Contractor management shall provide appropriate documentation.

K.4.4.4 Contractor supervisors and XYZ management review safety performance periodically.

K.4.4.5 For the hazards warrant, an industrial hygiene program for contract employees is provided by contract management to XYZ health and safety management.

K.4.4.6 Contractors report an incident (regardless of OSHA recordability) immediately to the XYZ representative and conduct a thorough investigation. Major incidents require a full investigation. A copy of all incident reports and investigations are provided to the designated XYZ representative.

K.4.4.7 The contractor submits a monthly summary of accident and work hours to the designated XYZ representative.

K.4.5 Monitoring Contractor Performance

A system is in place to regularly monitor and report the health and safety performance of all contractors for the duration of the contract.

K.4.5.1 Appropriate methods for monitoring by XYZ personnel are established. These may include:

- unannounced work place reviews,
- review of recordkeeping practices and documentation,
- review of contractor safety reports and action plans, and
- attendance of contractor safety meetings.

K.4.5.2 Contractors shall conduct self audits regarding their health and safety and report findings to the designated XYZ representative.

K.4.5.3 Contractors shall provide feedback regarding the status of all findings and recommendations.

K.4.5.4 Records of findings, recommendations and actions are kept on file.

K.4.6 Post Work

A program is in place to ensure that information on contractor performance is available.

K.4.6.1 The extent of the contractor evaluation is determined by the size and potential risks of the job.

K.4.6.2 A report on the evaluation is written and filed upon completion of each job.

K.4.6.3 The report addresses:

- comparison of contractor's performance to the safety objectives established for the job;
- results of the final or annual injury and illness statistical report by the contractor;
- degree of compliance with safety rules and procedures;
- thoroughness of job planning in safety-related items;
- safety communication effectiveness to the work force;
- availability and use of safety equipment;
- contract management's commitment to the program;
- promptness and effectiveness of corrections, practices, procedures, and conditions when identified as potential hazards; and
- accuracy of injury and illness statistics (comply with OSHA 29 CFR 1904 or local requirements).

K.4.6.4 Contractors are evaluated on the performance of their subcontractors.

K.4.6.5 This report is filed in a designated place and is easily accessible.

K.4.7 Exceptions

K.4.7.1 For small contracts, some requirements may not apply. These include paragraphs:

K.4.3.2.1 Safety representative for each job.

K.4.3.2.3 Contractor-written Hazard Communication Program.

K.4.3.2.4 Written emergency procedures.

K.4.4.2 Written work procedures.

K.4.4.3 Daily safety meetings.

K.4.4.4 Periodic safety performance review.

K.4.4.6.1 Monthly injury and illness report.

K.4.5.2 Contractor self audit program.

K.4.5.3 Feedback on self audit recommendations.

K.4.5.4 Findings, recommendations on file.

K.4.6 Post work evaluation.

K.4.7.2 A procedure is in place to define the system for XYZ approving exceptions and each exception(s) is documented.

K.5 Reports and Recordkeeping

K.5.1 Reports

K.5.1.1 Contractor incident reports are provided and filed.

K.5.1.2 Contractor health and safety performance monitoring reports are written and filed.

K.5.1.3 Post work contractor health and safety evaluation reports are written and filed.

K.5.1.4 Approvals for exceptions, as designated in 4.7, are filed in a designated place and are easily accessible.

K.5.2 Recordkeeping

K.5.2.1 Contractor selection criteria is on file.

K.5.2.2 All reports in 5.1 are kept in the central location.

K.6 Forms

Sample Evaluation Checklists

Annex L (informative)

Sample Audit Protocol for Owner's Contractor Health and Safety Program

Purpose: Annex L provides a sample audit protocol for an owner to audit a facility's contractor health and safety program. The audit protocol should be modified based on the company's requirements for contractor safety.

When to Use: When auditing the owner's contractor health and safety program.

Who Uses: Owner

Contractor Safety Management Systems Review Worksheet

Facility and Unit: _____

Date: _____

Review Team Members: _____

Results	Item Description	Observations and Comments
Commitment		
	1. Do XYZ facility safety representatives attend pre-bid conferences?	
	2. Do contracts contain adequate job-specific health and safety requirements?	
	3. Does the facility have procedures to prevent contractors from working at all locations should they consistently disregard or ignore health and safety requirements?	
	4. Does the contractor have a management system in place to ensure that client company safety requirements are consistently met?	
Contractor Selection		
	1. Are evaluations of contractors conducted prior to their selection?	
	2. Do the contractor evaluations include:	
	a) past safety performance (last 5 years),	
	b) past experience at XYZ facilities,	
	c) safe work procedures,	
	d) employee training and qualification,	
	e) safety programs,	
	f) hazard communication program,	
	g) proper health and safety documentation,	
	h) fitness for duty or medical surveillance policy,	
	i) accident statistics and incident rates, and	
	j) experience Modification Rates, where applicable.	
	3. Is there a record of the criteria used for contractor selection on file?	
	4. Are the evaluations of each contractor on file?	
	5. Are contractors removed from a qualified bidders list if safety conformance is not acceptable?	
	6. Are contractors removed from a qualified bid list if incident rates exceed the average of their Standard Industrial Classification?	
	7. Are there records which indicate that contractors have been removed from a qualified bidders list?	

Results	Item Description	Observations and Comments
	8. How are the appropriate individuals responsible for hiring contractors informed of a contractor being removed?	
	9. Are all appropriate individuals informed of which contractors have been removed from the bid list?	

Contractor Safety Management Systems Review Worksheet

Facility and Unit: _____

Date: _____

Results	Item Description	Observations and Comments
Pre-Work Criteria		
	1. Do client company safety personnel ensure that site specific and health requirements are prepared and used when discussing job requirements with contractors?	
	2. Are copies of the written requirements and all addenda kept with the contract on-site?	
	3. Do all contractor employees, including key contractor management representatives, receive a thorough site orientation before beginning work which includes:	
	a) Location safety requirements:	
	— facility safety rules,	
	— facility evacuation procedures,	
	— permitting of work activities,	
	— protective equipment requirements, and	
	— incident reporting procedures.	
	b) Hazard Communication Program briefing:	
	— hazards of chemicals, and	
	— hazards of processes.	
	c) Special hazards of the proposed work and areas, (physical, biological and chemical).	
	d) The appropriate communication lines between the contractor and XYZ representative has been established.	
	e) Emergency evacuation signals, routes and assembly areas.	
	4. Is there documentation that demonstrates that contractor employees understand the required XYZ safety rules and regulations prior to starting the job?	
	5. Does the prime contractor provide a representative responsible for all safety information and activities?	
	How often is the contractor safety representative on-site?	
	6. Have contractors demonstrated that their employees know how to perform their job tasks?	
	7. Have contractors provided documentation of employee training and qualification?	
	8. Was the training documentation reviewed and determined to be adequate by XYZ personnel?	
	Is there documentation as to who determined the adequacy?	

Results	Item Description	Observations and Comments
	9. Have written Hazard Communication Programs been provided by contractors?	
	10. Is there documentation that XYZ personnel have reviewed and determined that the program is adequate?	
	Is there documentation as to who determined the adequacy?	
	11. Are copies of the contractors Hazard Communication Program readily available to employees?	
	12. Have written emergency procedures been provided by contractors?	
	Are they compatible with the facility's emergency procedures?	
	13. Is there documentation that XYZ personnel have reviewed and determined that the emergency procedures are adequate?	
	Is there documentation as to who determined the adequacy?	
	14. Did the contractors emergency procedures contain an emergency evacuation plan?	
	Are they compatible with the facility's procedures?	
	15. Are the contractor emergency procedures readily available to employees?	
	16. Are the contractors emergency telephone numbers posted and convenient to all employees (both XYZ and contract)?	
	17. Has the contractor been provided with XYZ Hazard Communication Program?	
	18. Is it documented that the contractor received a copy of XYZ Hazard Communication Program?	
	19. Are copies of XYZ Hazard Communication Program readily available to contractor employees?	
Work Criteria		
	1. Are XYZ safe work permits prepared, reviewed and signed, where applicable, before any work begins?	
	2. Have written work procedures been provided by contractors where applicable and determined to be adequate by facility personnel?	
	Who reviewed the programs to determine their adequacy?	
	3. Do contractor employees frequently discuss health and safety issues?	
	a) What is the frequency?	
	b) Have the contractors provided appropriate documentation?	
	4. Is there a review of contractor safety performance periodically?	
	a) How often is this reviewed?	
	5. Do contractors have an Industrial Hygiene program for contractor employees?	
	a) Do they conduct periodic monitoring if necessary?	
	b) What type of monitoring is conducted?	
	6. Are all incidents involving contractors immediately reported to the XYZ representative?	
	7. Are thorough investigations conducted promptly?	
	8. Are copies of all incident reports provided to the representative?	
	9. Do the contractors submit a monthly report summarizing accidents and hours worked to the XYZ representative?	
	10. Are contractors regularly monitored by XYZ personnel involving:	

Results	Item Description	Observations and Comments
	a) unannounced workplace reviews;	
	b) review of recordkeeping practices and documentation;	
	c) review of contractor safety reports and action plans; and	
	d) attending contractor safety meetings.	
	11. Is there documentation of these monitored activities including:	
	a) who they were performed by,	
	b) date they occurred, and	
	c) items requiring correction or follow-up.	
	12. Do the contractors conduct self audits regarding health and safety?	
	13. Are copies of the contractors self audits provided to the XYZ representative?	
	14. Are documents of these self audits on file and available?	
Post Work		
	1. Are evaluations conducted on contractors after completion of the job?	
	2. Do the reports address the items identified in the Contractor Safety Standard?	
	3. Are documents supporting past work evaluations of contractors on file and available?	

Annex M

(informative)

Example Contract Safety Language and Contract Addendum

M.1 Examples of Contract Safety Language

M.1.1 Example 1

“The contractor shall comply with all federal, state and local government laws and regulations and owner job-site rules for safety, health and fire protection.”

M.1.2 Example 2

“It shall be the contractor’s responsibility to become fully acquainted with applicable health and safety laws and regulations prior to commencing work.”

M.1.3 Example 3

“The contractor and any subcontractor or agent shall inform the owner of any notices, warnings or asserted violations issued by any government agencies relative to the contracted work. In addition, the contractor shall immediately report governmental inspections, and the results of the inspections to the owner’s representative. Where advance notice is given of an inspection, the contractor shall report it to the owner’s representative upon the arrival of the inspector or inspectors.”

M.1.4 Example 4

“The contractor shall take all necessary precautions to keep the work site free from recognized hazards that are likely to cause injury, death, illness or damage to property.”

M.1.5 Example 5

“The contractor shall adhere to all legally mandated and generally accepted practices of safety and workmanship and to site safety standards or job work rules to avoid injury to workers and others and damage to equipment, materials and property.”

M.1.6 Example 6

“The owner may suspend work at any time or terminate the contract for a pattern of frequent failure to adhere to safety laws and regulations or the owner’s established on-site safety procedures.”

M.1.7 Example 7

“The owner may deny access to the site by the contractor and its employees if, in the owner’s sole judgement, such action is justified on the basis of safety.”

M.1.8 Example 8

“The contractor shall allow the owner to enter the work site to audit for compliance with the terms of this contract, including all addenda.”

M.1.9 Example 9

“The contractor agrees to maintain current records covering health and safety training for employees working on this project for the duration of this contract and agrees to make these records available to the owner for review at the owner’s request.”

M.2 Example of a Contract Addendum: Flare Repair

NOTE The following is a hypothetical example and is provided for illustrative purposes only. Actual addenda may vary in details and tasks covered.

“The contractor must adhere to the following safety requirements when performing maintenance on an inactive flare line that is in near proximity to a live flare:

- a) To prevent adjacent live flare smoke and by-products of combustion from entering the contractor work area, maintenance activity in the inactive flare pit shall only be allowed when the wind is blowing in a North East, North and North West direction.
- b) The owner’s radiant heat calculations verify that radiant heat shall not be significant within the “safe zone,” which is 500 ft from the flare center.
- c) Contractor personnel shall obey posted signs that restrict their access to the adjacent live flare area. Evidence of training in this area shall be documented and presented to the owner’s safety representative on-site.
- d) Whenever possible, material shall be prefabricated outside the flare pit to further minimize exposure.
- e) A contractor employee shall be assigned to monitor the wind condition at all times. This person shall have radio communication with the owner’s operations department and shall be capable of initiating an evacuation when necessary.
- f) Escape routes shall be preplanned, the contractor’s employees shall be trained on the escape routes and training shall be documented.
- g) No synthetic clothing shall be allowed in the inactive flare repair area.
- h) The contractor shall provide first-aid capabilities, including water-gel-type fire blankets.
- i) A full-time safety person shall be assigned to the project and shall be on-site whenever work activities shall take place in the inactive flare repair area.
- j) Based on the uniqueness of this project, the owner requires all contractors to attend a 15-minute safety briefing at the start and end of each shift.”

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