Georgia Gulf Chemicals and Vinyl's, LLC - Aberdeen Plant	Page 1 of 7
PROCESS SAFETY MANAGEMENT MANUAL	Revision 4
CONTRACTORS	PSM-007

Approved electronically by Plant Engineer

1.0 SCOPE

This document applies to all Georgia Gulf facilities located at the Aberdeen Plant covered by the OSHA regulation for Process Safety Management, 29 CFR 1910 119 [See PSM-001, Applicability Determination] This document does not apply to a person or entity providing incidental services which do not influence process safety, such as janitorial work, food and drink services, laundry delivery, or other supply services, even if such incidental services are performed in or near a covered process area

2.0 PURPOSE

The purpose of this procedure is to establish a screening process for the hiring and use of contractors and subcontractors who will accomplish the contracted work without compromising the safety and health of Georgia Gulf's, Contractors', or Subcontractors' employees at the Georgia Gulf Aberdeen Plant

3 0 DEFINITIONS

3 1 CONTRACTOR - Person or entity contracted by Georgia Gulf to perform work in and around a process that involves highly hazardous chemicals who has the potential for affecting process safety (e g , construction, demolition, equipment installation, maintenance, repair, turnaround, or specialty work on or adjacent to covered processes)

3 2 SUBCONTRACTOR - Person or entity retained by a Contractor to perform work in and around a process that involves highly hazardous chemicals who has the potential for affecting process safety at a Georgia Gulf Facility (e g construction, demolition equipment installation, maintenance, repair, turnaround or specialty work on or adjacent to covered processes)

3 3 FACILITY CONTRACT ADMINISTRATOR - The Facility Contract Administrator responsible for maintaining Georgia Gulf contracts at the Aberdeen Plant is the Materials & Logistics Manager The Materials & Logistics Manager performs the Aberdeen Plant s Facility Designee duties

4 0 CONTRACTOR SELECTION

4 1 CONTRACTOR SELECTION CRITERIA -Each contractor will fill out a Contractor Pre-Qualification Form (See Form # PSM-007-F002) A Contractor Pre-Qualification Evaluation Form will be reviewed and approved by representatives from Safety, Engineering, Maintenance and Purchasing If approved, a Master

Service Agreement will be issued for use when issuing purchase orders for services provided by the contractor

4 2 INFORMATION OBTAINED FROM CONTRACTOR - During the contractor selection process the Facility Contract Administrator or the Facility Designee shall obtain the following information from candidate Contractor(s) concerning the Contractor s and each Subcontractor s safety performances and programs

a A completed Pre-Qualification Form (Attachment 2)

b OSHA Form 200

c A written description of the Contractor s safety programs

5.0 CONTRACTOR EVALUATION

5 1 Representatives from Safety Engineering, Maintenance and Purchasing will evaluate the Contractor for PSM conformance using the Contractor Pre-Qualification Evaluation Form (See Form # PSM-007-F003)

5 2 The Contract Administrator will communicate any program deficiencies found to both approved and non-approved contractors The Training Specialists or designee will maintain the contractor pre-evaluation and audit forms electronically in DMS

5 3 General Information Provided to Contractor - The Facility Contract Administrator will provide a PSM information package to candidate Contractor(s) during the contractor selection process and prior to any work being performed The package shall as a minimum include

5 3 1 An overview of the covered process (es)

5 3 2 Information concerning the known fire, explosion, or toxic release hazards related to the work on the covered processes, including any unique hazards presented by the work

5 3 3 A copy or an extract of the Aberdeen Plant's Emergency Response Plan

5 3 4 A description of the Contractors' responsibilities under section 5 0 of this policy and CFR 1910 119, paragraph (h)

5 3 5 A copy of the applicable safe work practices for the control of hazards during operation of covered processes including, but not limited to

a Lockout / Tagout

b Confined Space Entry

c Opening Process Equipment and Piping

d Personal Protective Equipment

e Control over work that could affect process safety

f Other Facility Safety Rules and Procedures as applicable

5 4 The Aberdeen plant has developed and implemented safe work practices to control the entrance, presence and exit of contractors in covered process areas All contractors enter through the main gate by the guardhouse All contractors that will work in the plant on a regular basis are issued a plant security badge This badge is used to log entry and exit from the facility via a centralized computer system For contractors that do not have a security badge a log of their entrance is kept at the guard gate and maintained by the safety department

5 5 CONTRACTUAL EXHIBIT - After the preferred Contractor is selected, the Facility Contract Administrator shall assure that the final contract with the preferred Contractor includes an executed copy of "Exhibit E-- Process Safety Management of Highly Hazardous Chemicals"

6.0 OTHER GEORGIA GULF RESPONSIBILITIES

6 1 The Aberdeen site will evaluate contractor performance as follows

6 1 1 Injury/Illness log - Contractors are required to report monthly their performance to the safety department on "Monthly Contractors Report" Form # PSM-007-F001 located in DMS (Aberdeen \ PSM \ General Plant \ Procedures \ PSM Compliance Manual \ Contractors Safety & Health)

b Development of a combined contractor employee injury and illness log which distinguishes among contractors

6 2 The burden of training Contractor and Subcontractor employees is on the Contractor and Subcontractor, however, Georgia Gulf shall periodically evaluate Contractors' performance with respect to the contract employee instruction and training required under 29 CFR 1910 119-(h) (3) See Paragraph 8 0

6 3 Georgia Gulf will communicate changes to process chemicals technology, equipment and procedures to Contractors whose work (or whose Subcontractors' work) will be affected by such changes through the Management of Change Procedure See the Aberdeen Management of Change Procedure (PSM-011) in DMS

6 4 The Safety Manager will be responsible for receiving and responding to a notification from Contractors or Subcontractors of any unique hazards known or presented by the work and/or found by the Contractor or Subcontractor in performing the work The response to notification from Contractors/Subcontractors of a hazard shall be documented, and an explanation of the response shall be sent to affected contractors This communication shall be documented on the "Contractor's Notification of Hazard Form (Form # PSM-007-F005)

7.0 CONTRACTOR AND SUBCONTRACTOR RESPONSIBILITIES

7 1 Contractors have the responsibility to perform the requirements under 29 CFR 1910 119 (h) (3) and under (h) (2) with respect to their Subcontractors' compliance with the PSM standard

7 2 Contractors bear the primary responsibility of training its employees

7 2 1 Every employee of a covered Contractor/Subcontractor must be trained in the work practices necessary to perform his/her job safely and shall receive

a Training prior to beginning work on or near a covered process

b Additional training as necessary to prepare the employee for changes in the operation or work practices and to ensure that the employee's understanding of applicable safe work practices and other rules/requirements remains current

7 2 2 If contract employees are involved in operating a covered process or maintaining the on-going integrity of process equipment, then they must receive training in accordance with the specific training requirements set forth in paragraphs (g) and (j), respectively, of the OSHA PSM standard (1919 119)

Such training need not be identical in format or content or context to training given to Georgia Gulf's employees The critical element is that information required by the standard must be conveyed to and learned by contract employees as well as direct hire Georgia Gulf employees

7 2 3 Contractors shall assure Georgia Gulf that employees (and subcontractors employees) are instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency response plan

7 2 4 Contractors shall document that employees (and Subcontractors employees) have received and understood the training required by this standard

Contractor s shall prepare and maintain a record, which contains the identity of the contract employee, the date of training and the means, used to verify that the employee understood the training

7 2 5 Through mutual agreement, Contractor's and Georgia Gulf may determine that various topics of training can best be accomplished by Georgia Gulf providing the training In these instances, the Contractor remains responsible for all requirements outlined by the PSM standard including making arrangements for the required training, ensuring that all of its employees (and Subcontractors employees) are trained and understand the training provided maintaining documentation and records required by the OSHA PSM standard, etc

7 2 6 Contractors/Subcontractors shall assure that each contract employee follows the safety rules of the Aberdeen Plant including the safe work practices provided to the Contractor in the Safety Handbook provided to him by Georgia Gulf

7 2 7 The Contractors/Subcontractors shall advise the Safety Manager of any unique hazards presented by the Contractors/Subcontractor's work or of any hazards found by the Contractors' or Subcontractors' work (See Section 6 5)

7 2 8 In lieu of a Contractor's performing PSM-related obligations on behalf of its Subcontractor(s), a Contractor may demonstrate that it has means of assuring that its Subcontractor(s) meet these obligations

8.0 PSM CONTRACTOR AUDIT PROGRAM Georgia Gulf Aberdeen Plant shall conduct periodic job site inspections per the following:

8 1 Pre-Audit Activities

8 1 1 The contractor shall be notified of the audit at least two weeks in advance

8 1 2 The Training Specialist shall submit to the contractor a copy of the Contractor Audit Checklist (Form # PSM-007-F004) to allow the contractor to gather necessary information

8 1 3 The Contractor shall be prepared to submit any of the following upon request to the auditor within one week of being notified of the audit

a A completed Contractor Pre-Qualification Form

b A copy of the Contractor s OSHA 200 logs for any or all of the previous three years

c The Contractor s Experience Modifier Rate (EMR) for Workmen s Compensation Insurance, if self-insured, documentation and the formula used for calculating the EMR

d A copy of the Table of Contents from the Contractor s Safety Manual

e Any OSHA citations insurance carrier reports significant incident reports, etc , any additional information that would fall within the framework of the audit

8 2 Job-Site Inspection and Interviews

8 2 1 The Contractor shall be prepared to provide training and safety documentation, accident reports and incident investigations, and a copy of the Safety Manual to the auditor

8 2 2 The auditor shall use the Contractor Audit Checklist to direct the audit

8 2 3 The auditor shall interview at least two employees to determine if the contractor meets the requirements of the audit items

8 2 4 The Contractor shall arrange for the auditor to interview the key people responsible for compliance requirements If the Contractor wants to have particular people respond to specific sections on the audit checklist, he will make those people available at the appropriate time

8 2 5 The Training Specialist will have the primary responsibility of scheduling contractor audits A team including one person from the Safety Maintenance and Engineering Departments will conduct the audits

8 2 6 The Aberdeen PSM Audit program shall include document reviews interviews with Contractor and Subcontractor representatives and employees and field verification by observed behaviors and demonstration

8 2 7 The PSM Coordinator will determine the appropriate frequency to perform a comprehensive PSM Contractor audit taking into consideration such factors as services provided the Contractors term or tenure in the facility the Contractor's safety performance, prior evaluations/audits etc The frequency shall not exceed two years between audits

8 2 8 The Plant Engineer will notify the responsible Contractor in writing of any serious or chronic deficiency in performance or violation of a safety rule or safe work practice by a Contractor or Subcontractor employee which is

observed by Facility personnel at any time or which is revealed during a Contractor audit

8 2 9 The Plant Engineer shall follow up and document as appropriate, to ensure that corrective action has been taken to correct the deficiency and prevent future deficiencies

8 2 10 A copy of the audit results notifications of deficiencies and any follow up documentation shall be maintained electronically in DMS by the Training Specialist

8 3 Post Audit Activities

8 3 1 The auditor shall summarize his findings concerning the audit "verbally" in an exit interview and discuss the preliminary findings with the Contractor Site Manager

8 3 2 The Safety, Engineering and Maintenance department representatives shall evaluate the Contractor's safety performance according to Section 8 0 of the Contractor policy and send an evaluation report to the Contractor within two weeks

REVISION HISTORY

Company Name Change	1
Changes made to match Corporate Final Standard	2
General Changes as requested by D A Miller	3 (04/13/1998)
Changed Procedure to reflect Georgia Gulf Processes	4 (06/08/2000)