

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 1 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

Section 16.0 PROCESS SAFETY MANAGEMENT

A. Purpose

The purpose of this procedure is to establish formal guidelines for **JAGUAR ENERGY SERVICES, LLC** personnel who perform work activities at customer locations that are on or near processes with the potential for a release of toxic, reactive, flammable, or explosive highly hazardous chemicals (HHC's).

1. Implementation of this procedure will prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable, or explosive highly hazardous chemicals in the work area and enable **JAGUAR ENERGY SERVICES, LLC** to comply with OSHA 29 CFR 1910.119, Process Safety Management.

B. Scope

This procedure applies to all **JAGUAR ENERGY SERVICES, LLC** personnel who perform work activities at customer locations with the potential for a release of toxic, reactive, flammable, or explosive highly hazardous chemicals (HHC's).

1. The application of this requirement applies to contractors performing maintenance or repair, turnaround, major renovation, operation, or specialty work in or adjacent to a covered process.
 - (a) It does not apply to contractors providing incidental services which do not influence process safety, such as janitorial work, food and drink services, laundry, delivery or other supply services.
2. In the U.S., for a process to be considered a covered process, it must have one of the chemicals listed in the OSHA standard 29 CFR 1910.11 Appendix A at or above the threshold quantity, or contain more than 10,000 pounds of flammable liquid or gas at one location.

C. Responsibilities

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 2 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

1. The Safety Coordinator or his/her designee is responsible for ensuring that employees have completed the training required by this procedure.
 - (a) Additional responsibilities include:
 - (i) The implementation of this Policy.
 - (ii) Determining whether a customer site will be covered under this procedure prior to **JAGUAR ENERGY SERVICES, LLC** personnel arriving on site.
 - (iii) Documenting that each employee has received and understood the training required.
 - (iv) Preparing a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

2. The Supervisor is responsible for the implementation of this procedure.
 - (a) Additional responsibilities include:
 - (i) He will be **JAGUAR ENERGY SERVICES, LLC's** representative in the Management of Change process.
 - (ii) Assuring that all employees are trained in the work practices necessary to safely perform their job.
 - (iii) Assuring that each employee is instructed in known potential fire, explosion, or toxic release hazards related to his/her/her job, the process, and the applicable provisions of the emergency action plan.
 - (iv) Advising the client of any unique hazards presented by the work, or of any hazards found by their employees.
 - (v) Complying with the terms of these and all applicable OSHA regulations and fully cooperating in all client audits of **JAGUAR ENERGY SERVICES, LLC** records and programs.
 - (vi) Assuring that each employee follows the safety rules of the facility including all safe work practices.

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 3 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

3. **JAGUAR ENERGY SERVICES, LLC** personnel are responsible for understanding how PSM and impacts their roles and work tasks at customer sites that are covered by PSM.
 - (a) Additional responsibilities include:
 - (i) Know the following:
 - (i) Potential fire hazards, explosion or toxic release hazards related to his/her/her job and the process.
 - (ii) Site specific evacuation/emergency procedures, including alarm systems and evacuation plans and routes.
 - (iii) How to comply with the client evacuation/emergency plan.

4. The Client is responsible to obtain and evaluate information regarding the contract company's safety performance and programs.
 - (a) The client shall:
 - (i) Inform **JAGUAR ENERGY SERVICES, LLC's** person in charge of the known potential for fire, explosion, or toxic release hazards related to the contractor's work and process.
 - (ii) Explain to contractors the applicable provisions of the emergency action plan.
 - (iii) Review with all Seal-Tite, LLC personnel on the Evacuation/Emergency Alarm Procedures prior to the start of each project.
 - (iv) Develop and implement safe work practices to control entrance, presence and exit of contract employees in covered process areas.
 - (v) Periodically evaluate the performance of contract employers in fulfilling their obligations as defined in 29 CFR 1910.119.
 - (vi) Maintain a contract employee injury and illness log relating to the contractor's work in process areas.

D. Procedure

1. **Introduction**
JAGUAR ENERGY SERVICES, LLC personnel may be required to perform work tasks in or adjacent to a process at a customer location that practices PSM.

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 4 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

- (a) Any client information required in order to facilitate **JAGUAR ENERGY SERVICES, LLC's** compliance shall be requested immediately from the appropriate client representative.
 - (i) Material safety data sheets shall be used to provide process safety information, not provided by other means.
- 2. PSM is divided into the fourteen elements as listed below.
 - (a) Process Safety Information (PSI)
 - (b) Employee Involvement
 - (c) Process Hazard Analysis (PHA)
 - (d) Operating Procedures
 - (e) Training
 - (f) Contractors
 - (g) Pre-Startup Safety Review
 - (h) Mechanical Integrity
 - (i) Hot Work
 - (j) Management of Change
 - (k) Incident Investigation
 - (l) Emergency Planning and Response
 - (m) Compliance Audits
 - (n) Trade Secrets
- 3. This procedure addresses each element of PSM and its impact on **JAGUAR ENERGY SERVICES, LLC's** work to be conducted.
- 4. **Process Safety Information**
 PSM requires a compilation of written process safety information (PSI) including hazard information on the project, technology information and equipment information.
 - (a) **Impact**
JAGUAR ENERGY SERVICES, LLC may be required to provide information on their equipment to be used on the project.
 - (i) Such as:
 - (i) Materials of Construction
 - (ii) Piping and Instrumentation Diagrams
 - (iii) Electrical Classification Drawings
 - (iv) Relief System design and design basis

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 5 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

- (v) Design codes and standards used
- (vi) Safety systems

5. **Employee Involvement**

PSM requires the development of a written plan regarding employee (and contractor) participation on the conduct and development of process hazard analysis (PHA's) and other elements of PSM, and providing to employees and their representatives access to process hazard analysis and to all other information.

(a) **Impact**

Any **JAGUAR ENERGY SERVICES, LLC** person can request process hazard analyses information to facilitate safe work performance.

6. **Process Hazard Analysis**

Process facilities must conduct PHA's as soon as possible for each process.

- (a) PHA's must be updated and revalidated at least every five years and retained for the life of the process.

(b) **Impact**

JAGUAR ENERGY SERVICES, LLC personnel may be asked or required to sit in on PHA to provide technical expertise as it relates to the installation, maintenance, operation, or repair of the client's equipment.

7. **Operating Procedures**

Operating Procedures must be in writing and provide clear instructions for safely conducting activities involving process equipment.

- (a) Safety and health considerations and safety systems and their functions must be readily accessible to employees who work on or maintain process equipment.

- (b) Safe work practices must be implemented to provide for special circumstances such as lockout/tagout, confined space entry, opening process equipment or piping, and controls over entrance of the facility.

(c) **Impact**

JAGUAR ENERGY SERVICES, LLC personnel may be required to provide operating procedures for equipment installed.

8. **Training**

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 6 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

- (a) Training of **JAGUAR ENERGY SERVICES, LLC** personnel is **JAGUAR ENERGY SERVICES, LLC's** responsibility. However, where a unique hazard potentially exists, or where **JAGUAR ENERGY SERVICES, LLC** is not capable of providing adequate training, the client may elect to assist **JAGUAR ENERGY SERVICES, LLC** in training.
 - (2) **JAGUAR ENERGY SERVICES, LLC's** training programs may be monitored by the client representative.
 - (3) This training must be documented and records made available upon request to the client representative.
 - (4) Records shall be maintained in a format which provides the required training along with the training received to date.
- (a) Employees operating a covered process must be trained on the process and operating procedures.
 - (i) This training must emphasize specific safety and health hazards, emergency operations and safe work practices.
 - (ii) Initial training must occur before assignment.
 - (iii) Documented refresher training is required at least every three years.
- (b) **Impact**
JAGUAR ENERGY SERVICES, LLC personnel may be asked to provide proof of training to the client on the proper operation, maintenance, and care of equipment used in the process.

9. **Contractor Responsibilities**
Contract employers are required to train their employees in the work practices to perform their jobs, and document that employees received and understood training.

- (a) Contract employees must be trained on the potential process hazards and the local emergency action plan.

- (b) **Impact**
Contract personnel must be trained on PSM.

10. **Pre-startup Safety Review**
Process facilities must perform a safety review for new or significantly modified work sites to confirm that the construction and equipment of a process are in accordance with design specifications.

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 7 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

- (a) Adequate safety, operating, maintenance and emergency procedures must be in place.
 - (i) For new facilities, PHA's must be performed and recommendations resolved and implemented before start up.

(b) **Impact**

JAGUAR ENERGY SERVICES, LLC personnel may be required or asked by the customer to provide technical expertise as it relates to **JAGUAR ENERGY SERVICES, LLC** equipment installed.

11. **Mechanical Integrity**

Process facilities must establish and implement written procedures for the ongoing integrity of process equipment.

(a) **Impact**

JAGUAR ENERGY SERVICES, LLC personnel may be asked by the customer to provide information on proper maintenance, care, and inspection of their equipment.

12. **Hot Work**

No personnel shall perform hot work until a Hot Work Permits issued for hot work operations conducted on or near a covered process.

(a) **Impact**

JAGUAR ENERGY SERVICES, LLC personnel must be familiar with the client's hot work guidelines before performing any hot work.

- (i) **JAGUAR ENERGY SERVICES, LLC** personnel shall not perform any type of hot work until a hot work permit has been obtained.
- (ii) The hot work permit shall document compliance with the provision of OSHA 29 CFR 1910.252 (a).

13. **Management of Change**

Process facilities must establish and implement written procedures to manage changes to facilities that affect a covered process.

- (a) Affected employees must be trained on the changes prior to start-up.

- (i) Process safety information and operating procedures must be updated as necessary.

(b) **Impact**

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 8 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

JAGUAR ENERGY SERVICES, LLC personnel may be asked by the customer to provide information on modifications, care, maintenance, or repair of **JAGUAR ENERGY SERVICES, LLC** equipment as part of a change management program.

14. **Incident Investigation**

Process facilities are required to investigate, as soon as possible, but no later than 48 hours after incidents that resulted or could reasonably have resulted in catastrophic releases of covered chemicals. **JAGUAR ENERGY SERVICES, LLC** must:

- (i) Report all accidents, injuries and near misses immediately.
- (b) An investigation team must be assembled including at least one person knowledgeable in the process involved.
- (c) A written report on the incident must be filed.
- (d) Resolutions of accident investigation shall be documented and kept on file for five (5) years.

(e) **Impact**

In the event that an incident occurs as a result of an installation, maintenance, or repair work on conducted by **JAGUAR ENERGY SERVICES, LLC** personnel, the Safety Coordinator must be contacted immediately.

- (i) It is likely that the client will want to interview **JAGUAR ENERGY SERVICES, LLC** personnel as part of their investigation process.
- (ii) Before consenting to an interview, **JAGUAR ENERGY SERVICES, LLC** personnel must have permission from the Safety Coordinator.

15. **Emergency Planning and Response**

Process facilities must develop and implement an emergency action plan.

- (a) The emergency action plan must include procedures for handling small releases.

(b) **Impact**

JAGUAR ENERGY SERVICES, LLC personnel must be familiar with the client's emergency action plan.

- (i) In the event of fire ignition in close proximity to **JAGUAR ENERGY SERVICES, LLC** personnel, those persons shall evacuate the area and proceed with emergency notification

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 9 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

- (ii) unless the fire is readily extinguished with portable dry chemical equipment.
 - (ii) When in doubt the primary response should be notification.
 - (iii) All **JAGUAR ENERGY SERVICES, LLC** personnel shall be instructed that in event of an emergency such as fire, gas release, or accident involving injuries, they are required to immediately report it to the client representative.
 - (i) The reporting **JAGUAR ENERGY SERVICES, LLC** person is to state the problem clearly and fully and remain on the line until dismissed by the client representative.
 - (ii) **JAGUAR ENERGY SERVICES, LLC** personnel working in an area where an emergency exists will evacuate to a pre-designated assembly area.
 - (iv) Upon direction from a client representative, they will then proceed on a predetermined route to their facility entrance.
 - (i) If the emergency causes the route to their exit to be blocked, the employees will then use a secondary evacuation route.
 - (v) In either case they will remain there until instructed by the client representative to do otherwise.
 - (vi) **JAGUAR ENERGY SERVICES, LLC** personnel have the responsibility to account for their fellow employees and provide such information immediately to the client representative upon request.
 - (vii) **JAGUAR ENERGY SERVICES, LLC** personnel may not re-enter the emergency site without specific approval from the client representative.

16.

Compliance Audits

Process facilities will be required to certify that they have evaluated their compliance with process safety requirements at least every three years.

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 10 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

- (a) Prompt response to audit findings and documentation that deficiencies are corrected is required.
- (b) **Impact**
JAGUAR ENERGY SERVICES, LLC personnel may be required or asked by the customer to provide technical expertise in this exercise.

17. **Trade Secrets**

All contract employees must respect the confidentiality of trade secrets of the client.

- (a) **Impact:** All proprietary and confidential information relating to customer processes and process equipment must be kept confidential.

18. **Additional Guidelines for JAGUAR ENERGY SERVICES, LLC Personnel.**

- (a) **JAGUAR ENERGY SERVICES, LLC** personnel will follow the safety rules of the customer facilities and adhere to the following additional guidelines at customer process facilities.
 - (i) Advise customers of any unique hazards that may be presented or introduced by, or discovered during, Field Service work.
 - (ii) Identify all potential hazards before beginning a task.
 - (iii) Follow all precautions and cautionary signs and labeling.
 - (iv) Check with their job site supervisor or customer representative if they are unsure about a situation.
 - (v) Anticipate hazards that might arise and plan for controlling them.
 - (vi) Learn the customer procedure for reporting hazards.

19. **Customer Provided Training**

JAGUAR ENERGY SERVICES, LLC will assure the client of training provided to each employee assigned to process facilities, on the potential fire, explosion, and toxic release hazards related to the work site and the work tasks.

- (a) Process facilities will normally provide this information in the form of an orientation before work begins.

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526 Original Date of Implementation: October 2013 New Effective Date:	Process Safety Management Plan Revision Date: Page 11 of 11
Reviewed By: Jared Monk	Date: 01/10/2022

- (b) The process information provided to the **JAGUAR ENERGY SERVICES, LLC** person in charge by the customer must be conveyed to all affected personnel.

E. Required Training

1. **JAGUAR ENERGY SERVICES, LLC** personnel will be trained on the following topics:
 - (a) Elements of Process Safety Management.
 - (b) Impact of PSM on field work.
 - (c) Safety and health hazards of process facilities.
 - (d) Emergency operations.
 - (e) Safe work practices.
 - (f) Contents of this procedure.
2. This training will be documented and include:
 - (a) The identity of the employee
 - (b) The date of training
 - (c) The means used to verify that training was understood.

F. Training Frequency

1. **JAGUAR ENERGY SERVICES, LLC** personnel will be trained to the following schedule:
 - (a) Initially upon hire.
 - (b) Refresher every 36 months.