

CONTRACTOR PROGRAM

Revision History

Rev. #	Description of Change	Date	Revised By
0	Initial Issues	July 2016	PSM RMP Solutions

Purpose

The purpose of this contractor program is to ensure that contractors, subcontractors, and their employees are fully aware of the potential dangers involved with the storage of hazardous chemicals. This awareness should lead to reduced risks of accidents, and thus improved safety, for both contract employees and Inland Star Center Distribution Centers, Inc. employees.

This document summarizes how Inland Star Distribution Centers, Inc. complies with the contractor program requirements for the storage of hazardous chemicals. Inland Star Distribution Centers, Inc. has established this contractor program for all contractors and subcontractors performing work such as maintenance, repair, or renovation on or near the storage of hazardous chemicals. While incidental work such as janitorial or food service is not covered, any work that may affect the safety of the system should be included in the program.

Examples of contractors or subcontractors who could potentially affect process safety could include fork lift maintenance/repair operators working in the area of the storage of hazardous chemicals, as well as many others.

Responsibilities

The General Manager, Operations has overall responsibility for the contractor program at the facility including:

- Ensuring that contractor's safety performance and programs are evaluated when selecting contractors.
- Ensuring that contract employees are informed of potential fire, explosion or toxic release hazards related to the storage of hazardous chemicals.
- Developing and implementing safe work practices for controlling the entrance, presence, and exit of contract employees into the process area.

- Establishing procedures to periodically review the work and safety performance of contract employers working at the facility.
- Developing a contract employee injury and illness log relating to the contract employer's work in the process area.

The contractor's responsibilities are:

- Filling out the contractor qualifications and references questionnaire and returning it to the General Manager, Operations.
- Participating in pre bid and post bid meetings.
- Ensuring that their employees and any subcontractor employees have been trained.
- Ensuring that their employees and any subcontractor employees follow the safety rules of the facility including the site's safe work practices.
- Advising facility personnel of any unique hazards at the facility.

Contractor Program Steps

Specific procedures that should be followed are provided below:

Contractor Selection

When selecting a contractor or subcontractor, Inland Star Distribution Centers, Inc. evaluates information regarding the contractor's historical safety performance and current safety programs. The Contractor Qualification Form CQ1, included Attachment A, is used to obtain this information. The form is sent to each contractor who will be working on or near the storage of hazardous chemicals with instructions to fill it out and then return it to the General Manager, Operations.

The information obtained on Form CQ 1 and any previous work experience may be used to evaluate a contractor's safety performance and programs during the selection process. Issues which may be considered during the qualification process include:

- Does the contractor have knowledge of storage of hazardous chemicals?
- Does the contractor have any experience working on or around hazardous chemicals which are regulated under PSM and CalARP?
- How does the contractor's Experience Modification Rating (EMR) compare to other contractors?
- How does the contractor's accident record compare to other contractors?
- Has the contractor received any recent OSHA citations (and how were the citations resolved)?
- Do the contractor's written safety programs meet government and Inland Star Distribution Centers, Inc. standards?
- Has the contractor successfully implemented the programs and procedures described in their written safety programs?

If a contractor has previously worked at the facility, and the work to be bid is similar to the previous work, the contractor evaluation may be based upon the contractor's prior performance.

Contractor qualifications and their respective safety records and programs should be kept on file with the General Manager, Operations.

Contractor Awareness

Before any work is performed onsite, the contractor and subcontractor is informed of the potential hazards associated with the storage of hazardous chemicals, facility safe work practices, and emergency notification and evacuation procedures. The information may be given to a contractor during a meeting and/or site walkthrough. Alternatively the information may be mailed to a contractor.

The information that is reviewed with each contractor includes:

- General facility safety rules.
- Safety rule enforcement procedures.
- Procedures to control the presence, entrance and exit of contract employees in the area of the storage of hazardous chemicals.
- Facility Good Manufacturing Practice (GMP) procedures.
- Safety rules that apply to the area where work will be done.
- Proper personal attire and personal protective equipment required.
- Plot plans and Safety Data Sheets.
- Potential hazards associated with the storage of hazardous chemicals including the potential hazards associated with exposure to those chemicals.
- Fire and explosion prevention procedures including the location of firefighting equipment and the location of emergency exits.
- Unique hazards of the job including concealed dangers, toxic release hazards, and process hazards.
- Site specific safe work practices including lockout/tagout procedures, hot work permit procedures, and confined space entry procedures.
- Procedures which should be followed to report any chemical releases or other hazards contractors discover while they are on site.
- Applicable sections of the Emergency Action Plan.

The confirmation letter (Form CQ2) in Attachment A is typically used to document the information which was provided to each contractor and to specify the actions which should be taken by the contractor. Contractor awareness records should be kept on file by the General Manager, Operations. The contractor awareness information should be re-supplied on an annual basis.

Contractor Responsibilities

Each contract employee and each subcontractor employee should be made aware of the potential hazards of the storage of hazardous chemicals, the work practices necessary to safely perform their job, and the applicable portions of the Emergency Action Plan. Contractors are responsible for providing training to their employees and to subcontractor employees.

The Contract Employee Acknowledgment Record (Form CQ3), included in Attachment A, should be filled out to document that each contract employee and subcontractor employee has been trained and understood the training. Typically one record should be filled out for each employee trained. If the contractor conducts the training of the contract employees, then the contractor should fill out and maintain the records. If the training is conducted by the facility personnel, the training records should be filled out and maintained at the facility.

The contractor should assure that each contract employee follows the safety rules of the facility including the site's safe work practices. The assurances can be provided by the contractor conducting documented regular site inspections and conducting documented regular meetings with their employees. The contract employer must advise appropriate facility personnel of any unique hazards presented by the work it will perform and alert facility personnel to any hazards discovered during the contract employer's work.

The contractor should tell appropriate facility personnel of any hazards that they introduce to the facility, for example any hazardous chemicals which are used by their employees.

Periodic Evaluations

The General Manager, Operations regularly evaluates each contractor's performance to ensure they are meeting their PSM/CalARP obligations, including training, following safety procedures, and informing employees of hazards. This evaluation is conducted using the Contract Employer Evaluation Form CQ4 in Attachment A. An evaluation should be completed for each contract employee at least once every year and kept in the contractor files at the facility, maintained by the General Manager, Operations.

Contractor Injury and Illness Log

The facility maintains an injury and illness log related to the contractor's employees working on or in the vicinity of the storage of hazardous chemicals. These injuries and illness are typically documented through the incident investigation procedures. The General Manager, Operations is responsible for maintaining the contractor injury and illness log at the facility.

Attachment A

Form CQ1: Contractor Qualifications and References Questionnaire

Form CQ2: Confirmation Letter

Form CQ3: Contract Employee Acknowledgment Record

Form CQ4: Contract Employer Evaluation

Inland Star Distribution Centers, Inc.
Form CQ1: Contractor Qualifications and References Questionnaire

Name of person completing this form: _____

Date completed: _____

I. Organization	
A. Name of Business:	
Address:	
Year Established:	
Partnership:	Corporation:
Sole Proprietorship:	Other:
Officers:	
Name	Title
Name	Title

II. Bidding Interest	
A. What percentage of your work is:	
Commercial:	Industrial: Other (Specify):
B. Type of work you are interested in bidding:	
<input type="checkbox"/> Construction	
<input type="checkbox"/> General Contractor	
<input type="checkbox"/> Design/Build	
<input type="checkbox"/> Other (Specify):	
C. List current related projects in process or completed in the past five (5) years (attach additional sheets as needed):	

Inland Star Distribution Centers, Inc.
Form CQ1: Contractor Qualifications and References Questionnaire

III. References	
A. Previous work: (Completed for Inland Star Distribution Centers, Inc.)	
1. Location:	Date:
Type of work:	Value:
2. Location:	Date:
Type of work:	Value:
B. Other Work: (Completed for other clients)	
1. Client:	
Contact:	
Value:	
Telephone #:	
2. Client:	
Contact:	
Value:	
Telephone #:	
3. Client:	
Contact:	
Value:	
Telephone #:	
4. Client:	
Contact:	
Value:	
Telephone #:	
5. Client:	
Contact:	
Value:	
Telephone #:	

Inland Star Distribution Centers, Inc.
Form CQ1: Contractor Qualifications and References Questionnaire

IV. Safety			
A. Experience Modification Rating (EMR):			
This is an annual safety rating of how a specific contractor compares to other contractors, in the same type of work, in the state where the Contractor is working. (Contractor should have this rating, since it is provided by his insurance company).			
Show your EMRs as applicable for this current year and for the last two (2) years, as follows:			
EMR for	This Year	Last Year	Year Before
Home State:			
Interstate:			
Other States (List)			
B. Accident Experience			
Summarize the data shown on your OSHA Form 300 and OSHA Form 300A for all construction-related (not shop) injuries for year-to-date and for last year. All jobs.			
	This Year	Last Year	
Recordable (Medical)			
Restricted Duty			
Lost Time			
# of Days Lost			
List construction related injury incidence rates for year-to-date and for last year:			
<i>Rate</i> = Number of injuries x 200,000 divided by Total Man-Hours Worked			
<i>Severity</i> = Number of lost days x 200,000 divided by Total Man-Hours Worked			
Note: The number of recordable injuries includes the number of light duty plus lost time injuries.			
	This Year	Last Year	
Rate			
Recordable			
Lost Time			
Severity			
Have you experienced any construction fatalities within the past three (3) years? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, attach a full discussion of cause and results.			
Have you received an OSHA (or State OSHA) citation within the last three (3) years? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, attach a full report on event and results.			

Inland Star Distribution Centers, Inc.
Form CQ1: Contractor Qualifications and References Questionnaire

IV. Safety	
C. Safety Program	
Do you have a written:	
Safety Program?	<input type="checkbox"/> Yes <input type="checkbox"/> No
HAZCOM Program?	<input type="checkbox"/> Yes <input type="checkbox"/> No
HAZWOPER Program?	<input type="checkbox"/> Yes <input type="checkbox"/> No and/or Emergency Action Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Please submit them for our file. (Note: The safety plan will be evaluated per ANSI A10.38)</i>	
D. Process Safety Management	
Do you have experience working on or around process systems which contain:	
Regulated Chemicals?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Any other material regulated under PSM, RMP, and/or CalARP?	<input type="checkbox"/> Yes <input type="checkbox"/> No
(If yes, please list below)	
Any flammable material process covered by the OSHA PSM Standard? <input type="checkbox"/> Yes <input type="checkbox"/> No	
(If yes, please list below)	
E. Qualifications	
Do you have written documentation which demonstrates that you are trained and qualified to perform the following work (if applicable):	
Welding on Pressure Vessels	<input type="checkbox"/> Yes <input type="checkbox"/> No
Other	<input type="checkbox"/> Yes <input type="checkbox"/> No
(If yes, please list below)	

Inland Star Distribution Centers, Inc.

Form CQ2: Confirmation Letter – Safety Communications with Contract Employers

Note: To be printed on Inland Star Distribution Centers, Inc. letterhead.

By certified mail, return receipt requested

Date:

To: Contractor Name & Address

Attn:

Re: Employee Safety at Inland Star Distribution Centers, Inc. per the PSM/CalARP Program

This letter is intended to summarize our discussions with representatives of Contractor Name on Date, regarding safety issues at the Inland Star Distribution Centers, Inc. that may be encountered by your employees and by our own employees in connection with your work on our premises.

In our meeting(s) with you, we have specifically discussed the need to provide adequate warning and training to our own employees and to contract employees regarding workplace safety. Our concern is both for the safety of all employees, and documenting compliance with the OSHA Process Safety Management (PSM) Standard and California's Accidental Release Prevention Program (CalARP).

In order to ensure training and establish a safe workplace, we have taken the following actions and have agreed as follows:

1) Contractor Name on Date received from Inland Star Distribution Centers, Inc. a copy of the following materials:

- a. General facility safety rules.
- b. Safety rule enforcement procedures.
- c. Procedures to control the presence, entrance and exit of contract employees in the area of the storage of hazardous chemicals.
- d. Facility Good Manufacturing Practice (GMP) procedures.
- e. Food Safety Program rules.
- f. Proper personal attire and personal protective equipment required.
- g. Plot plans and Safety Data Sheets.
- h. Potential hazards associated with the hazardous chemicals including the potential hazards associated with exposure to those chemicals.
- i. Fire and explosion prevention procedures including the location of firefighting equipment and the location of emergency exits.
- j. Unique hazards of the job including concealed dangers, toxic release hazards, and process hazards.
- k. Site specific safe work practices including lockout/tagout procedures and hot work permit procedures.
- l. Procedures which should be followed to report any chemical releases or other hazards contractors discover while they are on-site.
- m. Applicable sections of the Emergency Response Plan.

Inland Star Distribution Centers, Inc.

Form CQ2: Confirmation Letter – Safety Communications with Contract Employers

Note: To be printed on Inland Star Distribution Centers, Inc. letterhead.

Contractor Name agrees that Inland Star Distribution Centers, Inc. conveyed all appropriate information concerning the known potential fire, explosion, and toxic release hazards, the relevant portions of the Emergency Response Plan, and the safe work practices prior to the start of any work on or near the storage of hazardous chemicals.

2) Inland Star Distribution Centers, Inc. assures that each contract employee is trained in the work practices necessary to safely perform his or her job, assures that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to the work he or she will perform in this facility and in the applicable provisions of the emergency response plan of this facility; and documents that each employee has received and understood the training and instructions.

3) **Contractor Name** will be responsible for relaying the information listed in item (1) to its individual employees before they come on premises.

4) In addition, **Contractor Name** will be responsible for instructing its employees to consult the information in item (1) **before they begin work**, and for checking that such consultation actually occurs.

5) In accordance with our contract, **Contractor Name** will advise Inland Star Distribution Centers, Inc. prior to beginning work, of any hazardous substances it will bring on premises and/or any safety issues that could be created by its work. Such information will be communicated in writing to the General Manager, Operations.

If your (contractor's) work will pose any safety issues for your employees, you will discuss those issues with the Owner's Representative before commencing that portion of the work.

6) The arrangements set forth in this letter will apply to all specific jobs currently under contract or negotiation with respect to the Inland Star Distribution Centers, Inc. and to all future jobs that involve the presence of **Contractor Name** employees on the Inland Star Distribution Centers, Inc. premises.

Very truly yours,

Daniel Alvarado
General Manager, Operations
Inland Star Distribution Centers, Inc.

Inland Star Distribution Centers, Inc.
Form CQ3: Contract Employee Acknowledgment Record

I. Company Information

Contractor Company Name:
Name of Employee:

II. Review of Inland Star Distribution Centers, Inc. Programs & Policies

	Check applicable items reviewed with employee. Employee to initial each box when instruction is completed and understood.	Employee Initials
<input type="checkbox"/>	1. General Facility Safety Rules	
<input type="checkbox"/>	2. Safety Rule Enforcement Procedures	
<input type="checkbox"/>	3. Procedures to Control the Presence, Entrance and Exit of Contract Employees	
<input type="checkbox"/>	4. Facility GMP Procedures	
<input type="checkbox"/>	5. Food Safety Program rules.	
<input type="checkbox"/>	6. Proper Personal Attire and Personal Protective Equipment Required	
<input type="checkbox"/>	7. Plot plans, Safety Data Sheets	
<input type="checkbox"/>	8. Potential Hazards Associated with the hazardous chemicals	
<input type="checkbox"/>	9. Fire and Explosion Prevention Procedures	
<input type="checkbox"/>	10. Unique Hazards of the Job	
<input type="checkbox"/>	11. Site Specific Safe Work Practices	
<input type="checkbox"/>	12. Procedures to Report Chemical Releases	
<input type="checkbox"/>	13. Applicable Sections of the Emergency Action Plan	

III. Contractor Employee Acknowledgment

I have reviewed the above checked items relating to the safety rules and safe work procedures for work at Inland Star Distribution Centers, Inc.	
Employee Name (Print):	
Employee Signature:	Date:

IV. Contractor Certification

I certify that the above named employee has received and understood the training described above.	
Supervisor Name (Print):	
Supervisor Signature:	Date:

Inland Star Distribution Centers, Inc.
Form CQ4: Contract Employer Evaluation

Section I: Information

Contractor Company Name:	Date:
Prepared By (Name & Title):	
Facility: Inland Star Distribution Centers, Inc.	Process:

Section II: Project Description

Project Description:

Section III: Evaluation

Question (Note: For all "no" answers, provide comments in space below.)	Acceptable? (Check Answer)		
Contractor consistently adhered to facility safety policies and procedures?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor obtained all necessary permits prior to initiating work?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor completed all monitoring as required by permits (i.e. - hot work, confined space, etc.)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor followed facility access control procedures?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor used required personal protective equipment (PPE) at all times?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor provided adequate staffing to complete the job safely?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor provided adequate supervision to complete the job safely?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor used proper tools for all tasks as required?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor informed Inland Star Distribution Centers, Inc. of any project changes?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor informed Inland Star Distribution Centers, Inc. of any hazardous substances it will bring on premises and/or any safety issues that could be created by its work?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Contractor maintained a clean job site (i.e.-demonstrated good housekeeping)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

