

Version: 24.0	Process Safety Management (PSM)	
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Brunel Energy, Inc.

Process Safety Management (PSM)

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program compliant with OSHA. The Process Safety Management (PSM) system is designed to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. **Process Safety Management** is the proactive identification, evaluation and mitigation or prevention of chemical releases that could occur as a result of failures in process, procedures, or equipment. The major objective is to prevent unwanted releases of hazardous chemicals, especially into locations which could expose our employees and/ or community to serious hazards. PSM consists of 14 elements:
 - 3.1.1. Employee participation
 - 3.1.2. Process safety information
 - 3.1.3. Process hazard analysis
 - 3.1.4. Operating procedures
 - 3.1.5. Training
 - 3.1.6. Contractors
 - 3.1.7. Pre-startup safety review
 - 3.1.8. Mechanical integrity
 - 3.1.9. Hot work permit
 - 3.1.10. Management of change
 - 3.1.11. Incident investigation
 - 3.1.12. Emergency planning and response

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3.1.13. Compliance audits

3.1.14. Trade secrets

4. Responsibilities

4.1. Manager(s)

4.1.1. Implementing, supporting, training, and enforcing the requirements of this Policy in their locations.

4.2. HSE Supervisor(s)

4.2.1. Assist management in the implementation of this Policy.

4.3. Employee(s)

4.3.1. Attend training on the work practices of his or her job when working on a PSM site.

4.3.2. Attend training on PSM requirements and toxic, fire and explosion hazards on site to work on a PSM site.

4.4. Subcontractors

4.4.1. The Company shall ensure all subcontractors have adequate training in the work practices of his or her job when working on a PSM site.

4.4.2. The Company shall ensure contractors 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 action plan.

4.4.3. Contractors shall inform the Company of any hazards found or presented by the contractor's work scope.

5. Procedure

5.1. Determination of PSM Coverage

5.1.1. The following methods shall be used to determine PSM coverage:

5.1.1.1. Prior to engaging in any work activity with a new client for a new site the project team shall ask for a written determination as to whether the work activity will take place on an OSHA PSM site and whether PSM regulations apply to The Company's scope of work.

5.1.1.2. When there is doubt concerning the applicability of PSM coverage The Company shall engage a PSM consultant to evaluate whether PSM regulations apply to the Company scope of work.

5.2. Meeting OSHA PSM Requirements

5.2.1. It is anticipated that OSHA PSM regulations will rarely, if ever apply to the Company's drilling and well servicing operations due to the exclusions in the regulations for these operations.

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- 5.2.2. When OSHA PSM regulations are deemed to apply the Company shall follow the OSHA PSM requirements including safe work practices and develop and maintain accurate PSM documentation to demonstrate compliance.
- 5.2.3. The Company shall collaborate with their client to ensure that The Company is compliant with the clients PSM requirements as far as they apply to The Company's operations.
- 5.2.4. Employees shall inform the Site Supervisor of any new hazards found on site.
- 5.2.5. Employees shall also immediately report all incidents and near misses. Incidents which have resulted in or could have resulted in a catastrophic release of highly hazardous chemicals in the workplace should be investigated within 48 hours of the incident. A report shall be prepared at the conclusion of the investigation.
- 5.2.6. The employer shall establish a system to promptly address and resolve the incident report findings and recommendations. The report shall be reviewed with all affected personnel and retained for five years.
- 5.2.7. Employees involved in operating a process and maintenance whose job tasks will be affected by a change in the process shall be informed of, and trained in, the change prior to start-up of the process or affected part of the process.
- 5.2.8. The hiring client's safe work practices must be followed during operations such as Lockout/Tagout, Confined Space entry, opening process equipment or piping and control over entrance to facility.
- 5.2.9. The site manager shall advise the host/facility/client of any hazards found or unique hazards presented by the Company's work.
- 5.2.10. Hot work shall not be performed until the hot work permit is obtained from the host facility/client.
- 5.2.11. The company employees will keep all trade secret information and confidentiality of trade secret information as required by safety standards and workplace confidentiality.
- 5.2.12. Management of Change procedures shall be followed for changes to process chemicals, equipment, and procedures; and changes to facilities that affect a covered person. The company will also consider impacts on safety and health, the technical basis, modifications to operating procedures, the necessary time period for the change, and the authorization requirements for the proposed change prior to implementing changes.

6. Training

- 6.1. If the Company is working on a PSM regulated facility, then the Company site management shall ensure all persons are trained on the basic PSM requirements (14 elements) to ensure compliance with PSM regulations. This training shall also focus on hazards related to their jobs and potential fire, explosion and/or toxic release hazards that may be present on the PSM site.

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- 6.2. Training shall be coordinated with the PSM site owner to ensure that the PSM programs are complementary and compatible.
- 6.3. PSM training records shall be documented and maintained in employee's records.

7. Reference

- 7.1. OSHA Standards 29-CFR. 1910.119 – Process Safety Management of highly hazardous chemicals.