

Contractor EHS

Management San Diego



Safety starts with *me.*



A FAMILY OF SOLUTIONS



The 10 Deadliest Jobs:

- 1. Logging workers
- 2. Fishers and related fishing workers
- 3. Aircraft pilot and flight engineers
- 4. Roofers
- 5. Structural iron and steel workers
- 6. Refuse and recyclable material collectors
- 7. Electrical power-line installers and repairers
- 8. Drivers/sales workers and truck drivers
- 9. Farmers, ranchers, and other agricultural managers
- 10. Construction Laborers**



Objective of the Program

- Prevent injuries to employees & contractors.
- Prevent other mishaps which impact the site, neighboring locations, & community.
- Comply with EHS regulations, permits and company requirements.



Why pre-qualify contractors?

- Contractors that have poor EHS skills have more injuries, property damage events and other mishaps.
- A contractor that violates Cal OSHA regulations on our property – places CP Kelco at risk of receiving citations for allowing the violations to occur.

Cal OSHA VPP requires:



Contractor selection and management criteria to include:

1. Regulatory history
2. Past EHS performance
3. Injury Rate below Industry NAICS Code
4. Ex Mod rate below 1.25 and/or efforts to get the rate below that level by the contractor
5. Monitoring of the contractor while on site
6. Verification that contractor employees receive the required safety and health training specific to the tasks they are performing, IE LOTO, Confined Space , Hazard Communication, Emergency Operations, PSM, etc.
7. Annual host company orientation for the contractors
8. Method for the contractors to inform the host of the hazards they introduce to the site.

San Diego CPK Contractor Management

San Diego disqualifies any contractor that has:

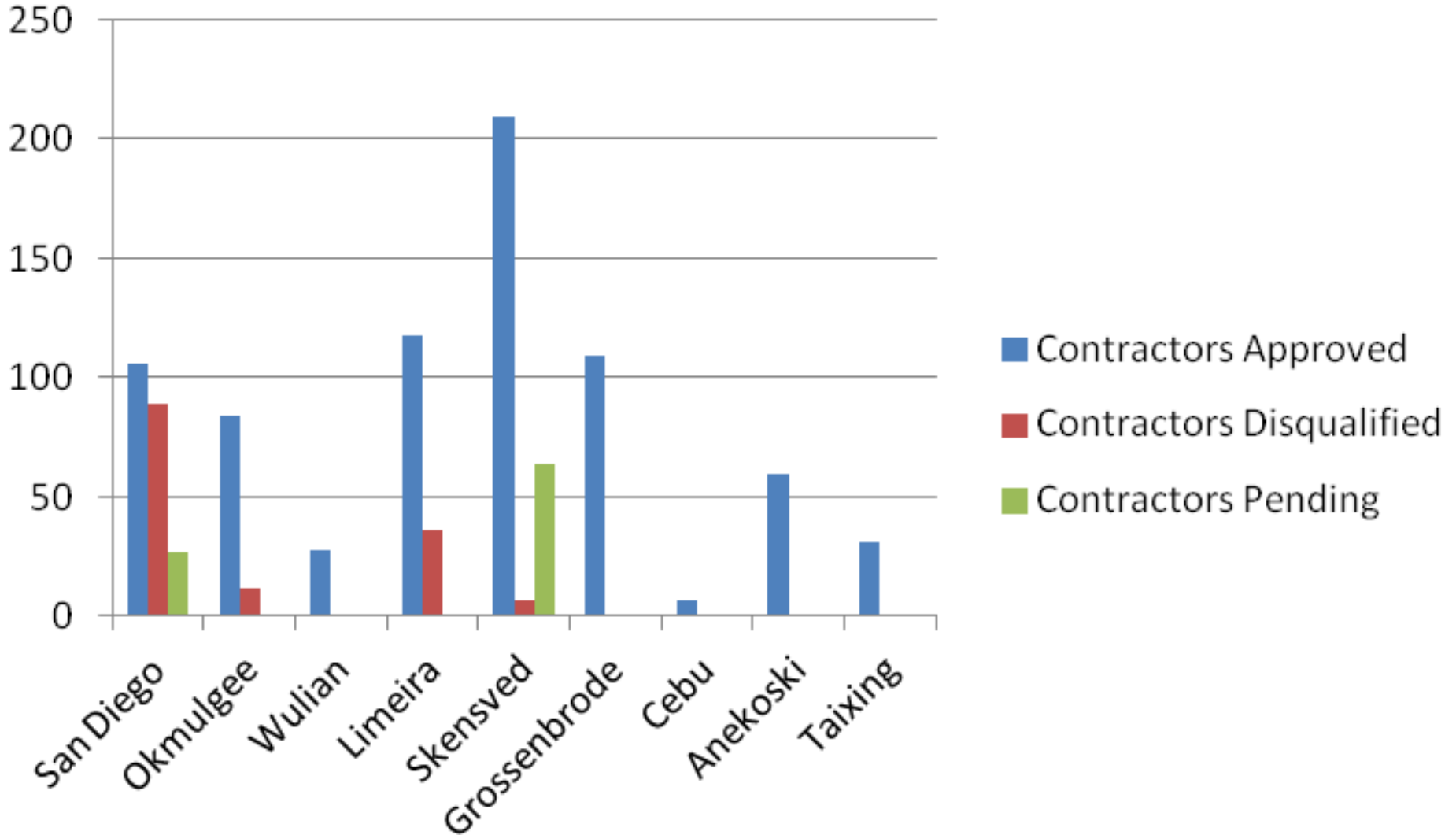
- Had a fatality in the last 3 years
- A 3 year average Incident rate over the industry average
- A regulatory violation within the last 3 years
- A lack of IIPP – EHS program
- Lack of training or lack of proof of training (contractor indicates they will not share records or do not keep them)
- A lack of a substance abuse program.
- Refusal to submit a questionnaire or data on the questionnaire
- Refusal to submit requested training records or other requested data.
- Poor EHS Evaluations of the contractor's previous work at CPK San Diego

Qualification of Contractors



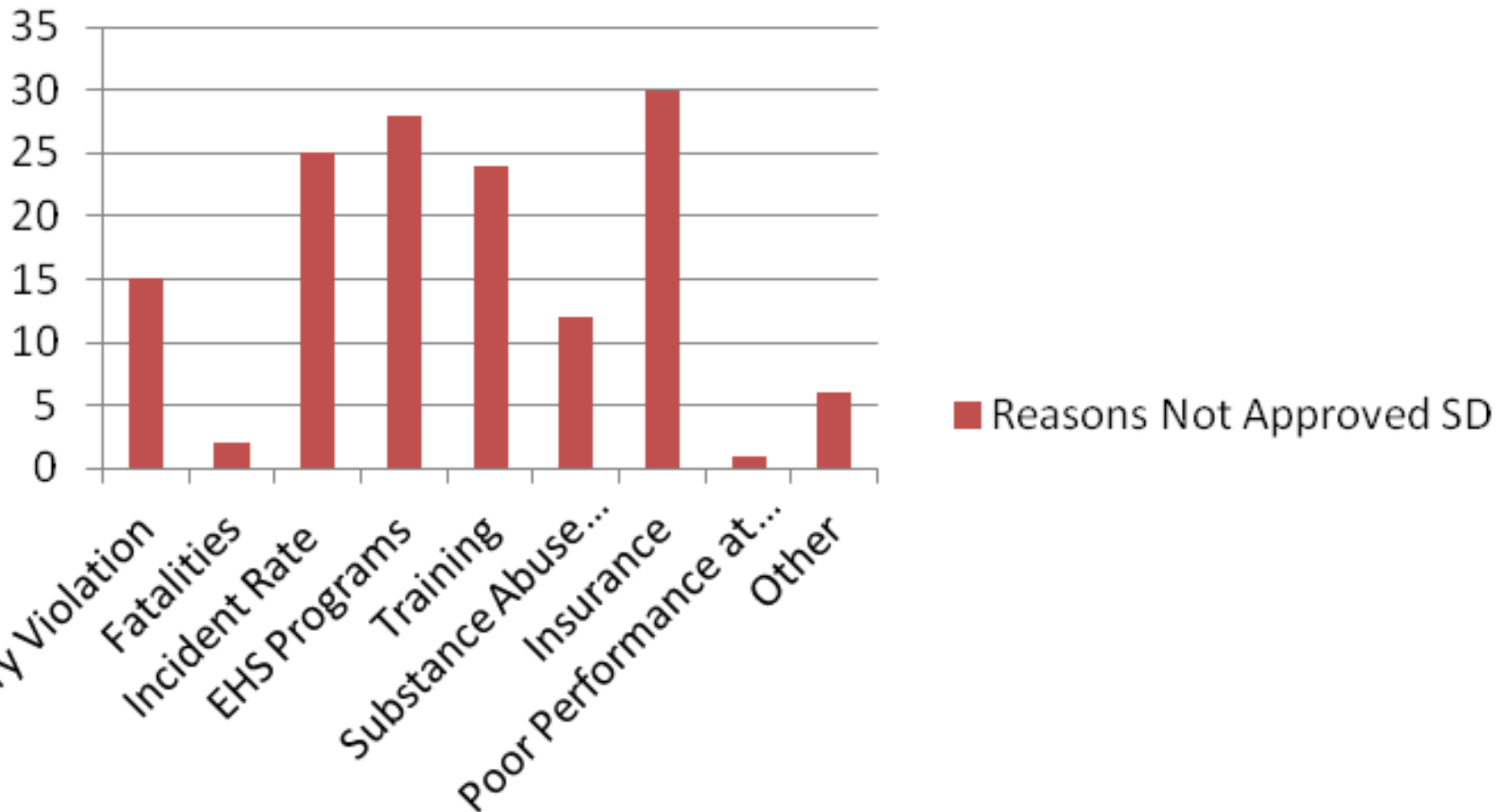
- ❖ Potential contractors are sent a Questionnaire.
- ❖ Contractor leaders complete and submit Questionnaires to CP Kelco EHS for review.
- ❖ Approved Contractors are placed on a corporate list.
- ❖ Non-Approved contractors are also placed on a corporate list.
- ❖ List is shared among CPK plants.

CP Kelco Contractor Qualification Stats by Location



Why were they not qualified?

Reasons Not Approved SD





Not Qualified?

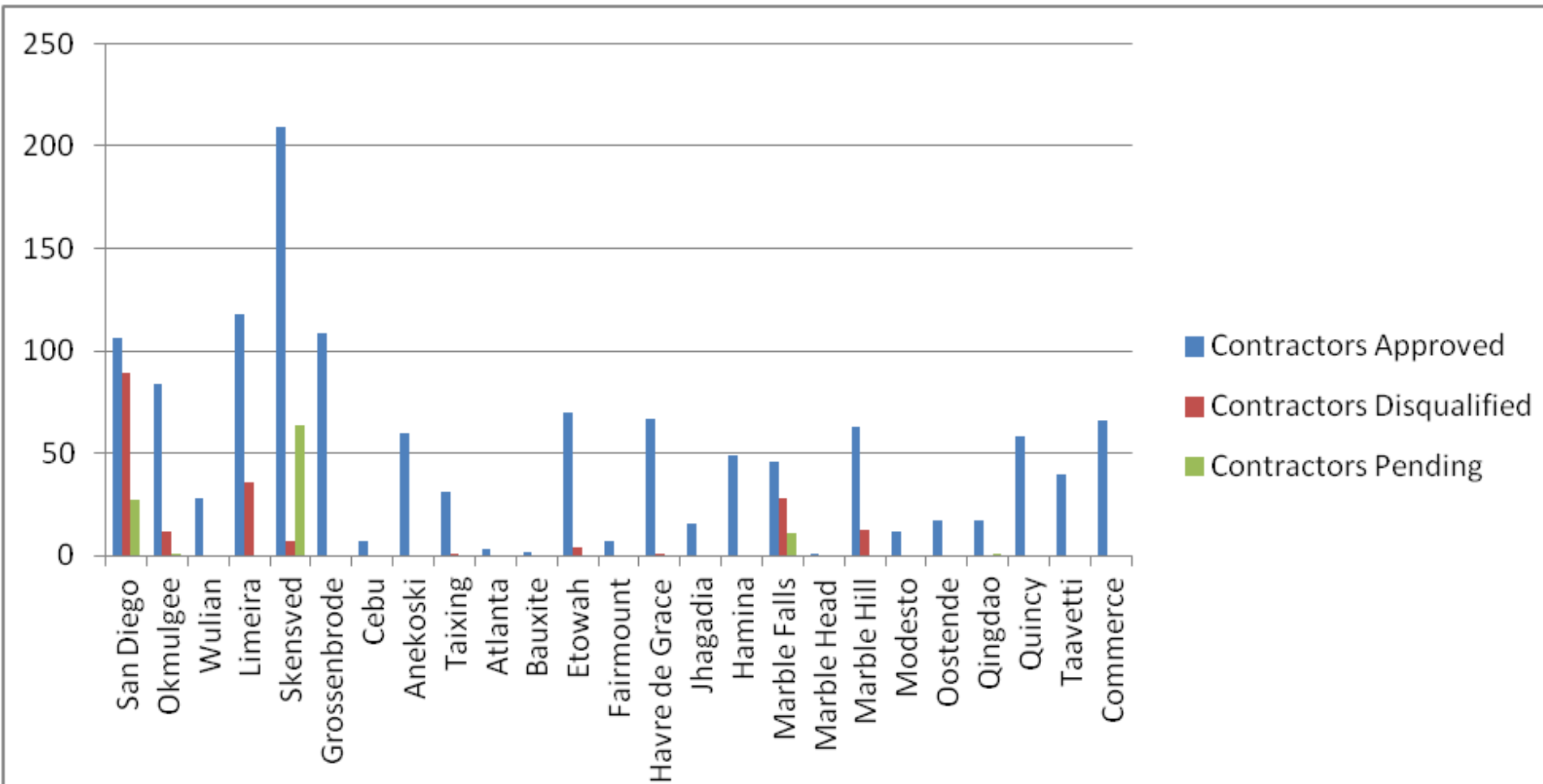
San Diego disqualifies more contractors than all other CP Kelco locations combined.

The top reasons were:

High injury rate, lack of EHS programs, lack of EHS training, & insufficient insurance

All JM Huber Contractor

Qualification Stats by Location



Current Components



- ❖ Once Questionnaire is approved.....
- ❖ *Verification of training/ programs.*
- ❖ **Before being allowed access to the site,** All Contractor employees are trained using a site specific, general hazard training program.

Contractor Management Team



- ❖ Our Contractor Management Team manages all aspects the Contractor EHS Management System (Site Procedure EHS-210).
- ❖ The team meets periodically to review progress.

SD Contractor Team

Larry Morgan - **SME**

Rose Vidal - **SME**

Igor Knufman

James Guy

Brenda Leitzow

Steve Ledford

SME = Subject Matter Expert

Basics



- ❖ **Purchase Requesters (PRs) / Project Managers (PMs)** are responsible for the contractors they invite on site.
- ❖ **PRs or PMs** develop a SCOPE to determine the required work.
- ❖ **PRs and PMs** assist contractors to preplan their activities if High Risk before arriving at the site. This is captured by the **briefing package** forms.
- ❖ Changes in the Plans/ **Briefing Package** require re-review.
- ❖ An **evaluation is conducted at the end of the job** to determine if the work had satisfactory EHS performance. If not, qualification may be cancelled.

Contractor EHS Management

High Risk Activities

- Any tasks indicated on **Table A** or a contractor activity which scores 12 or greater as indicated in this standard's Risk Ranking System ($R = S \times L$) prior to the application of mitigation or control measures or is considered High Risk by the site manager, project manager or the site EHS manager.
- High Risk Activities must have additional controls to reduce risk.



Work involving industrial vehicles is considered high risk.

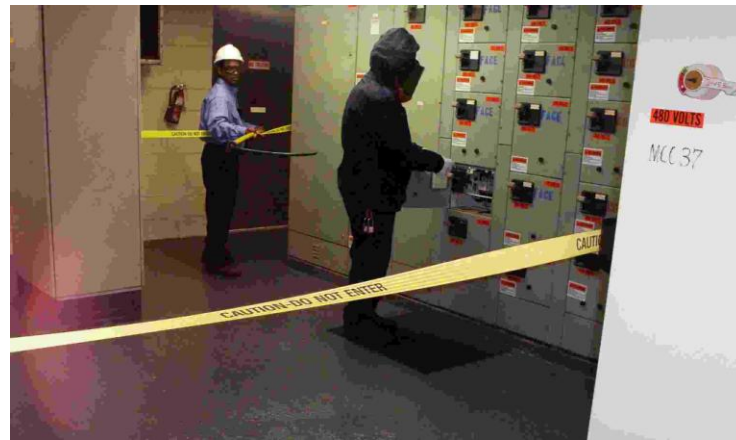


Table A = High Risk Activities

High Risk

Table A: High-Risk Activity and Task Determination Table

Contractor activities defined as high risk for the purposes of the Contractor EHS Management Standard
1. Any work on EHS-critical equipment (EHS400-MMSR)
2. Work involving application of Cardinal Safety Rules (Energy Isolation, Industrial Vehicles, Confined Space Entry, Work at Elevation, Hot Work, and First Break)
3. Work involving 10 or more contract workers
4. Contracted work involving greater than 10 man-years/year
5. Work involving hazardous chemicals with an Hazardous Material Identification System (HMIS) ranking in any one category of 3 or higher (will be modified to reflect harmonized code definitions)
6. Activities performed in or in close proximity to hazardous areas/installations such as motor control centers (MCC), pressure or explosion relief devices, covered processes according to the Process Safety Management (PSM) standard (United States) or Seveso Directive (Europe),
7. Any activities which rank HIGH according to the sector's risk ranking method. Sample method provided in the Risk Assessment Form EHS212A-FRM and EHS212B-FRM.



Contractor Briefing Package

It is the responsibility of the Purchase Requestor / Project Manager to help the contractor complete the **Briefing Package**.

The Briefing Package includes the steps of each task and the controls required to complete each step safely.

For specialized activities where CP Kelco does not have expertise, the contractor will need to determine these controls and document them in the briefing package.

The CP Kelco representative will assure that the contractor includes the controls needed to protect the contractor from hazards specific to the site.



Contractor EHS Performance Evaluation

https://www.industrysafe.com/Huber/newlook/index.asp?upd=0

McAfee

Favorites | Suggested Sites | Web Slice Gallery | Free Hotmail | Internet Service \$9.95

IndustrySafe Main Menu

INDUSTRYSAFE Account | System Functions | Help | Log Out

Home | Dashboard | Incidents | Inspections | Hazards | Observations | Corrective Actions | Training | Security

Inspection Checklist - Contractor Final Performance Evaluation - CPK 2

Item Number	Reference Number	Description	Status	Comments
01	San Diego Contractor Procedures	Hotwork, Line Breaking, General Work, Confined Space Entry, or Other Permits were completed as required, with all signatures/ approvals provided prior to work.	4 - Not Audited	
02	San Diego Contractor Procedures	Equipment was Locked Out Properly. No issues with this contractor and LOTO practices.	4 - Not Audited	
03	San Diego Contractor Procedures	All Contractors used fall protection equipment properly.	4 - Not Audited	
04	San Diego Contractor Procedures	Contractor tools, equipment and actions were acceptable in the Classified Areas (spark producing, non-explosion-proof equipment prohibited)	4 - Not Audited	
05	San Diego Contractor Procedures	Materials, Tools, equipment and waste were stored properly - not scattered on the walking/ working surfaces - creating slip and trip hazards.	4 - Not Audited	
06	San Diego Contractor Procedures	Emergency Equipment was provided properly and was kept in ready condition. Emergency eyewashes and showers, fire extinguishers, hoses, etc.	4 - Not Audited	
07	San Diego Contractor Procedures	All contractors wore the correct PPE, including the standard hardhat, safety toe shoes, safety glasses, hearing protection, gloves. For special tasks, restricted areas - the PPE listed for the areas was worn.	4 - Not Audited	
08	San Diego Contractor Procedures	Ladders were tied off or supported by additional person, were in good condition and were used properly.	4 - Not Audited	
09	San Diego Contractor Procedures	Vehicles were operated according to site rules concerning speed, restricted areas and parking locations, had all safety related equipment in proper working conditions. Overall safe use of vehicles.	4 - Not Audited	
10	San Diego Contractor Procedures	Machine guards were maintained in place and/or		

Done

Internet | Protected Mode: On

75%

- Will be completed after every contractor job

- For longer jobs tasks may be completed during the job.

- The evaluation is documented

- May affect the qualification status

- Will be kept with the Qualification records

- Form is available on IndustrySafe



Communication

All Contractor Incidents are reported through our internal and corporate metrics on a monthly basis.

Daily contractor EHS toolbox meetings may be required for extended contractor jobs.



Communication

The reasons why contractors are not considered qualified are reported back to the contractor.

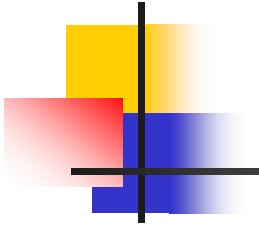
In some cases, CP Kelco works with the contractor on specific issues to bring their performance into compliance and best practices to help them achieve qualification.

In some cases, if a qualified contractor cannot be located, a deviation plan is developed to address the area(s) of concern. This plan requires approval of divisional CP Kelco Management

Contractor top management is contacted to address immediate hazards/ issues that are noted while contractors are on site.



STOP WORK Expectations



All employees have the right and are expected to stop contractor work if he or she believes the work to be hazardous to the contractor or other CPK Employees, against JMH/ CPK SDP EHS policies or against Cal OSHA regulations.

Such incidents will be documented in accordance with site EHS 500



Questions concerning the Contractor Management Programs should be directed to the SMEs or members of the Contractor Team.

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