HEALTH AND SAFETY PROCEDURE 325 – CONTRACTOR SAFETY MANAGEMENT

1.0 PURPOSE

Westlake, Plaquemine Operations, has developed this document to ensure the site achieves desired safety performance by Contractors, thus enhancing contractor employee protection. This document provides guidelines to assure that Contractors and their tiers of subcontractors are meeting or exceeding Westlake's expectations and requirements.

2.0 SCOPE

This document, including all appendices, applies to all Contractor companies performing work at Westlake, Plaquemine, through contractual agreement, by service contract, purchase order, etc., including, but not limited to Contractor personnel performing maintenance, repair, turnaround, renovation or specialty work. All contractors and their workers are required to adhere to all of Westlake's safety and health rules, regardless of their status or the length of time they perform work on the site.

3.0 DEFINITIONS

3.1 **Audit:** a formal process to assess the Contractor's HSE Management System and the degree of implementation at the work site including other compliance aspects for the scope of the work being performed.

3.2 **Contractor Focal Points: points-of-contact for various contractor issues.**

3.2.1 **HSE Contractor Focal Point**: the Westlake Plaquemine HSE Representative who has responsibilities for contractor safety management; may be contacted for questions concerning HSE policies and procedures, ISNetworld, process information, SDS requests, plant entry, post-job evaluations, and site orientation information.

3.2.2 **Procurement Contractor Focal Point**: the Westlake Plaquemine Procurement Manager; may be contacted for questions concerning agreements, terms and conditions, non-conformance filings, and insurance requirements.

3.3 **Contract Monitor:** refers to the Westlake person responsible for supervising the work of the Contractor. This may be an engineer, foreman, superintendent, supervisor, or other position as assigned by the management of the Westlake facility including personnel from a "nested" Contractor, or joint venture agreement, working in a coordinator's role for Westlake.

3.4 **Contractor**: in this document this term refers to any provider of a service, such as a contractor, sub-contractor, field representative, individual, etc. that will perform work on a Westlake work site, or on behalf of Westlake.

3.4.1 **Nested**: a Contractor that is housed onsite and performs work on a routine basis. This may include having permanent or temporary office or break facilities.

3.4.2 **Non-nested**: a Contractor that performs services onsite, but does not have permanent or temporary office or break facilities.

3.5 **Dashboard**: refers to the ISNetworld overall company grade or "Dashboard" grade as measured against the Westlake established requirements (all requirements are viewable in the ISNetworld system).

3.6 **HSE**: health, safety, and environmental; may also refer to the Westlake HSE department or personnel

3.7 **EMR**: Experience Modification Rate (A factor developed by measuring the difference between the insured's actual past experience or losses and the expected or actual loss).

3.8 **Grade**: same as "Dashboard" definition above.

3.9 **HSP**: Westlake's Health and Safety Procedures.

3.10 **Inspection**: a formal survey to assess the work site and workers' performance; inspections shall be documented.

3.11 **ISNetworld**: refers to ISNetworld Inc. (ISN), a web based, third party company, Westlake utilizes to provide administrative services to determine the level of compliance Contractors achieve based on requirements established by Westlake, Plaquemine Operations.

3.12 **Observation**: an informal survey to assess the work site and workers' performance; observations may or may not be documented.

3.13 **Procurement**: refers to personnel or department responsible for purchasing or procuring goods, services, Contractors, etc.; issuing contracts and obtaining agreements for Westlake.

3.14 **Security Center**: also referred to as the Main Gate, this building is located at the North side of the plant and is where the contract security workforce manages the following, in part: Contractor badging, security operations, activation of and dispatch center for plant emergencies, and contractor visitor orientation facilitation.

4.0 RESPONSIBILITIES

4.1 Procurement Department

4.1.1 Issue contracts for services to only those companies that have satisfied all Contractor qualification requirements for Westlake, Plaquemine.

4.1.2 Issue contracts, purchase orders to Contractors that have A or B company grade in ISNetworld.

4.1.3 Retain copies of all required contract documents for PSM audit purposes.

4.1.4 Inform all Contractors that a condition of performing work at the Plaquemine Complex is to adhere to the site safety requirements.

4.2 Contract Monitor

4.2.1 Ensure Contractor and all subcontractors have acceptable ISNetworld company grade before requesting them to the site; **All subcontractors shall have their own ISNetworld account.**

4.2.2 Invite Contractors to attend the quarterly contractor safety meetings held in the Rebecca Room of the HSE building.

4.2.3 Ensure Contractors are informed and aware of known potential fire, explosion, or toxic release hazards related to their work areas.

4.2.4 Monitor Contractor's work areas for compliance to all applicable regulations and Westlake's health and safety policies and procedures.

4.2.5 Participate in inspections of Contractor work areas and ensure closure on inspection findings.

4.2.6 Obtain contact information for Contractors' home office, corporate health and safety contact, job superintendent, and site health and safety representative.

4.2.7 Review all Contractor chemical inventories and SDS and send all new chemicals through "New Chemical Approval" process.

4.2.8 Complete "Post-Job Evaluation" for all projects in which the project crew size is 25 or greater.

4.2.9 Notify HSE of any Contractor incident immediately.

4.2.10 Send incident report/investigation report to HSE upon receiving the report.

4.2.11 Ensure the Contractor is aware of the public Westlake website in which all Westlake HSPs can be found. See the URL in the section of this document titled, "Core Expectations." The HSPs provide the requirements of the safe work practices of the location.

4.3 Health, Safety & Environmental Department (HSE)

4.3.1 Monitor ISNetworld grades for all connected Contractors; work with ISN and the Contractor to maintain an acceptable grade.

4.3.2 Evaluate Contractor health and safety requirements to ensure full compliance with requirements of this policy during the qualification process. This will be accomplished within ISNetworld.

4.3.3 Review annually, nested Contractor's safety performance and verify implementation through field inspections and surveillance.

4.3.4 Keep all Westlake HSPs up-to-date in the HSP website made available to Contractors.

4.4 Operations Supervision

4.4.1 Westlake operations and maintenance supervision will meet as often as necessary with Contractors to discuss safe work practices and contractor safety performance.

4.5 Security

4.5.1 Ensure Contractor company has A or B ISNetworld company grade; if acceptable grade is not achieved, deny gate entry.

4.5.2 Ensure that Contractors wear temporary badge and appropriate safety equipment (e.g. hard hat, safety glasses, long pants, closed-toe leather footwear, and NIOSH approved acid gas escape respirator (Honeywell (model 7902) preferred) prior to entry into the facility.

4.5.3 Ensure that all Contractors have required safety orientations prior to entering plant for work.

4.5.4 Provide site-specific orientation for Contractor personnel prior to allowing work on site for emergency jobs via HSE approval.

4.5.5 Ensure that all Contractor employees use the turnstiles or scanners when entering and leaving the complex.

4.5.6 Periodically inspect vehicles upon entering and exiting the plant per Westlake's security plan.

4.5.7 Issue Gate Passes and ensure decals are visible on both sides of Contractor vehicles

4.6 Contractors and Subcontractors

4.6.1 Submit all qualification forms and subsequent documentation associated with the pre-qualification process for the Contractor and any sub-contractors to ISNetworld; **All subcontractors shall have their own ISNetworld account.**

4.6.2 Ensure all employees and subcontractor employees complete the ARSC Basic Plus safety orientation and Westlake site-specific orientation prior to beginning work on site.

4.6.3 Ensure all employees are familiar with Westlake Safe Work Practices within the HSPs and review Westlake HSPs with all employees any time a procedure change occurs.

4.6.4 Ensure all vehicles entering the facility have decals visible on both sides of the vehicle.

4.6.5 Provide timely identification, correction, and tracking of uncontrolled hazards in the work area, and utilize "Stop Work Authority."

4.6.6 Conduct and document frequent safety inspections of the work site.

4.6.7 Conduct weekly safety meetings for all employees.

4.6.8 Conduct daily tailgate safety meetings.

4.6.9 Report all incidents, injuries, and near misses as soon as possible to operations, and, within one (1) hour report all incidents, injuries, and near misses to the Contract Monitor and HSE Representative. If off-site medical treatment is required for any employee, immediately notify the HSE Department.

4.6.10 Turn in an incident investigation report to the Contract Monitor and HSE Representative by the end of the shift on which the event occurred. A root cause analysis or 5Y, must also be submitted to the Contract Monitor and HSE Department within twenty-four (24) hours.

4.6.11 Comply with all applicable federal regulations and Westlake safety policies and procedures.

4.6.12 Participate in scheduled third-party or Westlake internal process safety management (PSM) audits for Contractors; this will include providing requested documentation and following action items to closure.

4.6.13 Submit hours worked in ISNetworld by the 5th of each month.

4.6.14 Train employees on procedure changes sent out via email to ISNetworld contacts.

4.6.15 Develop health and safety goals and objectives supportive of Westlake's company goals in an equivalent manner.

5.0 CONTRACTOR TIERS

5.1 Requirements of Tiered Contractor Companies

5.1.1 **<u>Tier 1</u>** – **Visitors/Deliveries/Vendors – these companies/individuals do not perform work either on or adjacent to process equipment.**

5.1.1.1 These companies or individuals do not require subscription to ISNetworld.

5.1.1.2 Examples of these companies or individuals are: a visitor of a Westlake employee or Contractor employee, hot shot delivery, training rep, sales, Entergy, gas/pipeline suppliers.

5.1.1.3 Valid visitor orientation required for entry (12WLKV).

5.1.1.4 **All visitors and vendors shall be 100% escorted** while onsite by a Westlake employee or nested Contractor which holds the following credentials: Westlake Plaquemine site-specific orientation, ARSC Basic Plus orientation, and TWIC card.

5.1.1.5 Deliveries are not required to be escorted.

5.1.2 **<u>Tier 2</u> – Non-Operational Contractors – these companies may perform work either adjacent to process equipment or adjacent to the property battery limits, but for no reason perform hands-on work on process equipment. Typically these contractors are considered service companies.**

5.1.2.1 These companies do require a subscription to ISNetworld.

5.1.2.2 Exemption to ISNetworld is allowed by written approval from HSE dept. – safety and insurance review still required.

5.1.2.3 Their work could require safe work permits from operations, however, they would not perform any work on process equipment.

5.1.2.4 Companies performing work inside laboratories are not required to subscribe to ISNetworld; this excludes construction or renovation to the building. Companies performing work inside laboratories must still have their insurance approved by Purchasing.

5.1.2.5 Examples of service companies are: Tire repairs, windshield replacement, fencing, equipment rental, engineering contractors, PSM consultants, landscaping, and chemical service companies.

5.1.2.6 Valid Basic Orientation Plus/Refresher and Westlake site-specific required for entry (12WLKPLQ).

5.1.3 **<u>Tier 3</u>** – **Operational Contractors – These companies perform maintenance or repair, turnaround, major renovation or specialty work either on or adjacent to process equipment; this tier consists of nested and job-specific Contractors.**

5.1.3.1 These companies require subscription to ISNetworld.

5.1.3.2 Examples of service companies are: work on piping, vessels, or other equipment, work on DCS, fire maintenance provider, turnaround services.

5.1.3.3 Safe Work Permits are required for most of their work.

5.1.3.4 Required to review and accept policies/HSPs annually via

ISNetworld.

5.1.3.5 Valid Basic Orientation Plus/Refresher and Westlake site specific orientation required for entry (12WLKPLQ).

5.1.3.6 Signed agreement in place with Procurement department.

6.0 PROCEDURE

6.1 Qualification

6.1.1 The following information will be utilized to measure a contractor's and subcontractor's prior safety performance. Contractors and subcontractors that do not adequately meet an acceptable level of achievement will not be allowed to perform work at Westlake, Plaquemine Operations.

6.2 Required Qualification Submittals

6.2.1 Prior to, or as part of the bid evaluation process, all prospective Contractors shall submit the following information to their ISNetworld account for review and acceptance by Westlake/ISNetworld:

6.2.1.1 Answer the Prequalification Questionnaire within the ISN account.

6.2.1.2 OSHA 300 and 300A logs covering the past three years and the current year-to-date for the company and local/regional office.

6.2.1.3 Worker's Compensation Insurance Experience Modification Rate (EMR) documentation from the Contractor's workers comp carrier for the past three years.

6.2.1.4 A current copy of Contractor's Health and Safety Manual.

6.2.1.5 A valid Certificate of Insurance (COI) which meets Westlake's insurance requirements.

6.3 Other Data

6.3.1 In addition, a review may be conducted of audit reports from former clients, the Greater Baton Rouge Industry Alliance (GBRIA), and previous Westlake projects.

6.4 Selection

6.4.1 Submittal Review

6.4.1.1 A complete review of the Prequalification Questionnaire will be conducted by ISN Review and Verification Service (RAVS) to ensure the company meets our minimum criteria.

6.4.1.2 The three year average of the local/regional office incident rate may not exceed the national average in the applicable NAISC code, as published by the Bureau of Labor Statistics (BLS).

6.4.1.3 The Contractor's EMR rate may **not exceed 1.00** to be a qualified Contractor at Westlake, without an approved variance.

6.4.2 Pre-Bid Meetings

6.4.2.1 Based upon the size and scope of the project a pre-bid meeting may be conducted and made available to all prospective Contractors. During the pre-bid meeting a Westlake representative will discuss the health and safety requirements of this Contract and any unique expectations, based upon the project scope.

6.4.3 Contract Language

6.4.3.1 To ensure Contractors are made aware of Westlake's health and safety requirements the contract language shall contain details of special issues expected of Contractors when working within Plaquemine Operations.

6.5 Re-Qualification

6.5.1 Contractors must re-qualify annually, prior to issuing a new contract, or as requested by ISNetworld or Westlake. ISNetworld will send the Contractor notice to resubmit their information.

6.5.1.1 Re-Qualification includes:

6.5.1.1.1 Updated OSHA 300 logs
6.5.1.1.2 Updated EMR documentation
6.5.1.1.3 Annual review and acceptance of policies
6.5.1.1.4 Same OSHA TRIR and EMR requirements as original qualification.
6.5.1.1.5 Contractor updated Health and Safety Manual (if requested)
6.5.1.1.6 Valid COI

6.5.2 Contractors whose insurance has expired may still be allowed access to the site up to 30 days after the insurance expiration date. Contractors whose ISNetworld grade has reached an unacceptable level for any other reason will be permitted entry if a purchase order was issued before the grade became unacceptable, however, further purchase orders may not be issued until the contractor has achieved an acceptable grade.

6.6 Pre-Job Start

6.6.1 Safety Plan

6.6.1.1 The Contractor must submit a Safety Plan when the project crew size is 25 or greater. The Safety Plan will also be required for any project which a Contract Monitor, a Westlake HSE Representative, or other Westlake employee requests.

6.6.1.2 In the qualification process and anytime requested thereafter, the Contractor will submit, for Westlake HSE final review and acceptance, a written Safety Plan consistent with OSHA regulations, consistent with Westlake safety requirements, and specific to the tasks to be performed. See Appendix C for a Safety Plan Worksheet that should be included in the plan. The Plan, at a minimum, will contain the following:

6.6.1.2.1 Safety Policy Statement, signed by the principal officer of the company, which describes the organization’s health and safety goals. The Contractor’s health and safety goals and objectives shall be supportive of Westlake’s company goals in an equivalent manner.

6.6.1.2.2 Name, qualifications, and duties of the Contractor

Safety Representative
6.6.1.2.3 Hazard Communication Program
6.6.1.2.4 Respiratory Protection Program
6.6.1.2.5 Fall Protection Plan
6.6.1.2.6 Training Programs including: employee orientation, hazard communication, personal protective equipment, confined space entry, and control of hazardous energy
6.6.1.2.7 Name and qualifications of excavation competent person (if applicable)
6.6.1.2.8 Name and training certification of First Aid designee
6.6.1.2.9 Process by which the project will be internally inspected for health and safety deficiencies
6.6.1.2.10 Safety meeting program
6.6.1.2.11 Disciplinary action program
6.6.1.2.12 Analysis of hazards anticipated with job tasks
6.6.1.2.13 List of critical lifts to be performed during the project
6.6.1.2.14 Emergency response plan

6.6.1.3 Westlake HSE will promptly review the Safety Plan

6.6.2 Kick-Off Meetings

6.6.2.1 Following contract award a pre-construction meeting (kick-off) will be held with the Contractor's management. The Contractor's site supervisor must attend the pre-construction meeting. Applicable health and safety issues shall be discussed during the pre-construction meeting.

6.6.2.2 During the pre-construction meeting a Westlake Contract Monitor and a Westlake HSE Representative will be assigned to the project for coordination with the Contractor.

6.6.2.3 All required submittals shall be received and approved prior to the Contractor being released to proceed with mobilization and construction.

6.6.2.4 See Appendix A for a Sample Kickoff Meeting Outline.

6.6.3 Orientation

6.6.3.1 All Contractor employees are required to attend Westlake

Site-Specific Orientation at an Alliance Safety Council or other ARSC council prior to beginning work on-site. See Westlake HSP-103 “Plant Entry Requirements” for specific details.

6.6.3.2 The Site-Specific Orientation informs Contractors or the potential fire, explosion, and toxic release hazards, and explains contractor responsibilities in support of the emergency action plan.

6.6.4 Core Expectations

6.6.4.1 It is the expectation of Westlake, Plaquemine Operations, that Contractors use Westlake’s Health and Safety Procedures to orient their employees on the Westlake site-specific HSE requirements that may affect their work. Additionally, Contractors must obtain a copy of the Contractor HSE Reference Guide from their Contract Monitor or the HSE Department. This document will cover items such as emergency response, incident reporting, life critical procedures, etc. It is intended to be used as an additional tool to orient the Contractor to on site requirements. It is the expectation that this document is reviewed with all crew members before beginning work on site.

Note: Use the following URL to obtain the latest revision of Westlake, Plaquemine Operations’, HSPs: http://westlake.com/plaquemine-ehs

6.6.4.2 The Contractor shall report all injuries, illnesses, or near-misses to operations as soon as possible.

6.6.4.3 The Contractor shall, within 1 hour, verbally notify their Contract Monitor and the Westlake HSE Department contact of all injuries, illnesses, or near-miss incidents. If it is determined an employee must be taken off-site for medical treatment, the HSE Department must be notified immediately.

6.6.4.4 The Contractor will assign a Level 1 Contractor Safety Representative to each project when crew size is 24 or fewer, or otherwise requested by the Contract Monitor, HSE Department, or other Westlake employee. This safety representative may be the Supervisor, Foreman, or crew leader, but must make certain the responsibilities of the safety representative are satisfied.

6.6.4.5 The Contractor will assign a Level 2 Contractor Safety Representative when the project crew size is 25 or greater, or otherwise requested by the Contract Monitor, Westlake HSE Representative, or other Westlake employee. The Contractor Safety Representative's resume will be included in the safety plan, or other document, and shall be made available for review when requested. The Level 2 Contractor Safety Representative shall not have any other job duties and shall not hold the role of Supervisor, Foreman, or Crew Leader.

6.6.4.5.1 When a project meets the criteria for level 2 safety oversight, one or more of the following shall be met:

- 6.6.4.5.1.1 Hold a designation issued by the Board of Certified Safety Professionals (CSP, ASP, GSP, OHST, CHST, etc)
- 6.6.4.5.1.2 Hold the Certificate for Occupational Safety Managers (COSM)
- 6.6.4.5.1.3 Hold the Certified Occupational Safety Specialist (COSS) designation
- 6.6.4.5.1.4 Have two (2) or more years of documented, relevant field safety experience where safety is his/her primary function

6.6.4.6 Level 1 and 2 Contractor Safety Representative responsibilities will include, but may not be limited to the following:

- 6.6.4.6.1 Authority to take immediate action to correct safety violations and, if necessary, stop work
- 6.6.4.6.2 Conduct weekly safety meetings with project employees
- 6.6.4.6.3 Conduct frequent safety inspections and document findings
- 6.6.4.6.4 Conduct daily tailgate safety meetings

6.6.4.7 When the contract work force exceeds five (5) personnel, the Contractor will provide at least one (1) employee trained in Basic First Aid and CPR/AED to be onsite during project work hours.

6.6.4.8 Nested Contractors are not required to have an employee trained in Basic First Aid and CPR/AED if the workforce exceeds 5 personnel. Nested Contractors will utilize Westlake's Medical Emergency Response Team (MERT) if an emergency occurs.

6.6.4.9 The Contractor will maintain a first aid kit of adequate size for the number of employees working on the project.

6.6.4.10 Westlake's MERT is available on all shifts. In the event of a medical emergency, notify Westlake personnel for assistance from the MERT.

6.6.5 Approved Contractor List

6.6.5.1 A list will be maintained at the Security Center which will be comprised of companies that are approved to work at Westlake, Plaquemine Operations, by both HSE and Procurement.

6.6.5.2 There will also be an Approved Contractor Variance List maintained at the gate for Contractors which have approved variances to work onsite.

6.6.5.3 Both lists are available on the on the Contractor Safety Management page in SharePoint for the Plaquemine location.

6.6.5.4 To be an approved Contractor, ALL of the following must be achieved and maintained:

6.6.5.4.1 Active coverage of insurance and acceptable limits.

6.6.5.4.2 Agreed upon Master Services Agreement.

6.6.5.4.3 Active member of ISNetworld- account that is sourced with accurate information-and an acceptable company grade of an A or B.

6.6.5.4.4 The Approved Contractor List is checked for accuracy daily. Any Contractor that does not maintain said data will be removed from the Approved Contractor List and denied entry, even if currently performing services on site.

6.7 Work in Progress

6.7.1 Evaluation

6.7.1.1 Throughout the duration of the project, the Contract Monitor, HSE Representative, and Operations will perform occasional observations and inspections of the job. Hazards found during these inspections/observations must be mitigated immediately, and all other issues escalated as appropriate.

6.8 Post-Job Evaluation

6.8.1 Following completion of a project completed by a Contractor in which the project crew size is 25 or greater, the Contract Monitor shall conduct a Post-Job Evaluation of the Contractor's performance and enter this evaluation into ISNetworld. The Post-Job Evaluation may also be completed after any work performed by a contractor if the Contract Monitor so chooses. Appendix F can be used to assist with the evaluation.

6.8.2 Service contracts will be reviewed on an annual basis.

7.0 RECORDKEEPING

7.1 Contractor Audits

7.1.1 Copies of all formal audits and inspections of a Contractor's performance shall be maintained in the HSE Department.

7.2 Post-Job Evaluation

7.2.1 The Post-Job Evaluation Form will be completed by the Contract Monitor utilizing ISNetworld. Appendix F is a hard copy of the form which must be completed in ISNetworld.

7.3 Variances

7.3.1 Approved variances will be kept by the HSE Department in the Contractor's folder. The HSE Contractor Focal Point will maintain these files.

7.4 Non-Conformance Filings

7.4.1 The Contract Monitor, Westlake HSE, or others may file a Non-Conformance with Purchasing, using appendix E. These are filed when the Contractor performs subpar. The Procurement Department will maintain these records.

8.0 VARIANCES

8.1 All Contractors which do not meet Westlake, Plaquemine Operation's ISNetworld requirements must have an approved ISNetworld Requirements Variance on file to perform work on site. This form is found in Appendix D.

8.2 Variance Approvals:

8.2.1 A Contractor with a company grade of C will require the review and approval of the following:

8.2.1.1 HSE Representative
8.2.1.2 HSE Manager
8.2.1.3 Procurement Representative (if applicable)

8.2.2 A Contractor with a company grade of F will require the review and approval of the following:

8.2.2.1 HSE Representative
8.2.2.2 HSE Manager
8.2.2.3 Procurement Representative (if applicable)
8.2.2.4 Site Manager (all F variances except insurance)

8.2.3 Risk Exposure Plan

8.2.3.1 Based on the Contractor's Grade of A, B, C, or F and the level of inherent risk within the scope of work, a HSE Risk Exposure Plan can be requested from a Contractor to add an additional layer of protection. HSE Risk Exposure Plans are not required when adequate corrective actions have been implemented.

8.2.3.1.1 Contractors rated "A" or "B" may not require an HSE Risk Exposure Plan.
8.2.3.1.2 For "C" rated Contractors and HSE risk Exposure Plan is recommended. Written approval using the variance process established by Appendix D is required.

8.2.3.1.3 For “F” rated Contractors a HSE Risk Exposure Plan is highly recommended. Written approval using the variance process established by Appendix D is required.

8.2.3.2 HSE Risk Exposure Plans may be comprised of any combination of the following:

8.2.3.2.1 Site Specific Safety Plan
8.2.3.2.2 Safety Advisor/Personnel Support
8.2.3.2.3 Emergency Response Plan
8.2.3.2.4 Field Verification Auditing
8.2.3.2.5 Additional Medical Support
8.2.3.2.6 Other requirements deemed necessary

8.2.3.3 The Risk Exposure Plan does not have to be a separate document, but can be a plan documented within the variance.

8.2.3.4 It is the responsibility of the Contract Monitor to obtain all the necessary signatures for the variance and submit to the HSE Contractor Focal Point so the Approved Contractor Variance List can be updated accordingly.

9.0 PROGRAM REVIEW

9.1 This Program will be reviewed periodically. HSE will ensure this review is performed. The purpose is to assess compliance and to evaluate program effectiveness.

9.2 Following the review, the program will be revised to include any necessary changes. Review results will be documented. All employees will be informed of any changes made in the plan.

8.2 Department Managers will be informed of review results.

11.0 APPENDICES

11.1 **Appendix A** - Sample Kick Off Meeting Outline
11.2 **Appendix B** - Louisiana State Fire Marshals’ Request for Exemption- (2000-

11) and Interpretive Memos (2002-01 & 2002-02).

11.3 **Appendix C** - Safety Plan Worksheet
11.4 **Appendix D** - ISNetworld Requirements Variance Form
11.5 **Appendix E** - Non-Conformance Form
11.6 **Appendix F** - Post-Job Evaluation Form
11.7 **Appendix G** - PPE Matrix

Revision History

Rev	Changes	Approved	Date
13	*Updated logo, added "Current Review Date", no content changes*	H. Garner	3/16/2023
13	*Added language about expiring/failing contractors.*	H. Garner	8/05/2019
12	*Minor revisions not affecting the current process. Deleted appendix A. Appendix A was summary of all procedures. This is now made available in the Contractor Reference Guide. Moved certain items not captured in other procedures from Appendix A to the regular procedure.*	H. Garner	1/01/2019
11	*Edited the "Cranes" section of Appendix A to comply with the new crane procedure, HSP 330.*	H. Garner	8/01/2018
10	*Westlake branding. Added definitions. Requiring 100% escort of Visitors. No man-basket lifts without variance. Meeting VPP requirements. Requires a JSA for all safe work permits. Meeting HSE Audit action items. Removes requirement to have someone CPR certified for nested contractors. Requires a Safety Plan and Post-Job Evaluation when a project crew size is 25 or greater. Added hydro blasting procedure requirements. Added drug testing requirement to App. A. Requires use of PFLs. Updated appendices.*	H. Garner	1/01/2018

Appendix A-

Sample Kickoff Meeting Outline

Name of Project:
Contractors Involved:
Date:

1. Introductions and PACE
2. Project Overview
3. Safety
   A. PPE, Site Entry Requirements (badge request)
   B. Parking / Gate Entrance
   C. Vehicle Access
   D. Daily Safe Work Permitting, LOTO Procedure (Blue/Yellow Locks w/ name/company)
   E. Safe Process Piping, Equipment, & Vessel Opening
   F. FW / HW / Confined Space Policies, Metering
   G. Hard Barricades: Handrail / Grating Removal, Process Equipment Barricades
   H. Equipment Flagmen
   I. Lightning Policy
   J. Cell Phone Policy
   K. Weekly / Monthly Alarms
   L. Incident Notification / Emergency Contacts / Radio (channels, qty)
   M. Break / Smoke Pen / Lunch Areas / Temporary Buildings
   N. SDS (SiteHawk)
   O. CPR / First Aid Requirements
   P. Westlake HSE Procedures Website: http://westlake.com/plaquemine-ehs
   Q. Invitation to Quarterly Contractor Safety Meeting (Send Contractor contact info to safety)
4. General
   A. Excavation Permit, Probing Requirements
   B. Hot Work / Fire Box location(s)
   C. Muster Location
   D. Major Equipment Mobilization, Locations
   E. Change Order Process
5. Schedule
   A. Mobilization / Milestones / Completion
   B. Work Hours
   C. Manpower
   D. Update Meetings (time, location)
6. Project Execution / Planning Update
   A. Contractor Submittals (WPS, SSSP, etc.)
   B. Fabrication Update
   C. Material / General Procurement / Manpower issues
   D. Subcontractors on-site (Scaffold, NDE, M / O Crane, etc.) (Must be in ISN)

APPENDIX B-

Louisiana State Fire Marshals' Request for Exemption–(2000-11) and Interpretive Memos (2002-01 & 2002-02)

The effective Date of this form is April 1, 2002
NOTICE: Please be advised that this form conforms with the June 6, 2000 (2000-11) and the January 20, 2002 (2002-01 & 2002-02) Memoranda

REQUEST FOR EXEMPTION

Temporary Construction Buildings & Tents

THIS REQUEST MUST BE MAILED WITH THE REQUIRED FEE

DATE of Application:

Use this Form to Request Exemption from Formal Plan Review for Temporary Construction Trailers, Jobsite Offices, and Tents

LOUISIANA DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS
OFFICE OF STATE FIRE MARSHAL
8181 INDEPENDENCE BOULEVARD
BATON ROUGE, LOUISIANA 70806
PHONE (225) 925-4920 FAX (225) 925-4414
WEB SITE: www.dps.state.la.us/sfm

REVIEW FEE $20.00 EACH BLDG

ANNUAL SUBMITTAL FEE CALCULATION

NUMBER OF STRUCTURES (TENTS OR BUILDINGS)		X	$20.00 EACH	=	TOTAL FEE	$

Check or Money Order ONLY
MUST BE RECEIVED WITH APPLICATION

APPLICANT REQUESTING THE EXEMPTION

NAME		PHONE ( )
MAILING ADDRESS (Street/P.O. Box)		FAX ( )
CITY	STATE	ZIP CODE
EMAIL ADDRESS		

BUILDING OR TENT INFORMATION

HOW LONG WILL THE BUILDING OR TENT BE ON SITE? (Maximum of 12 Months)	
SERIAL NUMBER OR OTHER TYPE OF IDENTIFICATION NUMBER(S) OF THE BUILDING(S)	

BUILDING INFO

The Intended Use of the Temporary Building ☐ Office [38] ☐ Meeting/ Dining [12] ☐ Construction [40] like Welding or Carpentry ☐ Storage [42] — SIZE OF BUILDING SQ. FT

PHYSICAL LOCATION OF THE TEMPORARY BUILDING
Provide directions so inspector can locate the building in the field

PLANT OR FACILITY NAME

ADDRESS (Street Number and Street Name)

Inside City Limits ☐ Outside City Limits ☐ | CITY (In or Near) | ZIP CODE | PARISH

TENT INFO

USE OF TENTS
☐ MEETING / DINING [12]
☐ STORAGE [42]
☐ CONSTRUCTION [40]
☐ ____________

HOW MANY TENTS | SIZE OF TENT(S) Sq. Ft. | UNSECURED DOORS OR FLAPS ☐ 1 END ONLY ☐ BOTH ENDS

DISTANCE FROM ANY BUILDING TO CLOSEST TENT Feet | NUMBER OF SIDES MORE THAN 50% OPEN

SMALLEST DISTANCE BETWEEN ANY 2 TENTS Feet | ELECTRIC LIGHTING ☐ YES ☐ NO

PLEASE BE ADVISED THAT THIS EXEMPTION TO STATE FIRE MARSHAL PLAN REVIEW DOES NOT CIRCUMVENT COMPLIANCE WITH THE REQUIREMENTS OF NFPA 101 LIFE SAFETY CODE OR ANY APPLICABLE RULES AND REGULATIONS ENFORCED BY THIS OFFICE.

FOR FIRE MARSHAL USE ONLY	PROJECT NUMBER	REVIEW ARCHITECT	DATE RECEIVED BY FIRE MARSHAL
Your REQUEST for EXEMPTION is: ☐ Accepted ☐ Denied		Response Date	

REPLY

Comments

DO NOT FAX THIS REQUEST - YOU MUST MAIL THIS FORM ACCOMPANIED BY THE REQUIRED FEE

CONTACT THE INDICATED DISTRICT OFFICE FOR FINAL INSPECTION:
☐ HEALTH CARE
☐ BATON ROUGE 800-256-5452
☐ LAFAYETTE 800-554-0006
☐ NEW ORLEANS 888-634-7689
☐ SHREVEPORT 888-634-7682

INTERPRETIVE MEMORANDUM 2002 - 01

To: Licensed Architects
Licensed Engineers
Licensed Sprinkler Contractors
Licensed Fire Alarm Contractors
Licensed Fire Suppression Contractors
Felicia Cooper, Administrator - Inspections
Stephen Gogreve, Manager
Boyd Petty, Manager
Pat Day, Supervisor of Health Care Inspections
Plan Review Staff

From: Jean Carter, Architect Supervisor
Henry Reed, Architect Supervisor
Don Zeringue, Architect Supervisor
Fidel Fremin, Architect Supervisor

Approved: Mark Gates,
Deputy Assistant Secretary/Chief Architect

Date: January 28, 2002

Re: **Temporary Buildings**

Definition of Temporary:

A building may be considered temporary if it is expected to be in place for less than one year and as determined by the Office of the State Fire Marshal.

General Requirements:

- Temporary buildings shall comply with the most recently adopted edition of NFPA 101, Life Safety Code, unless modified by the following.
- Due to the use of temporary field offices, storage facilities and industrial occupancies located within industrial facilities or construction sites by able-bodied personnel, these facilities will not be required to meet the ADAAG requirements of the State of Louisiana. However, in the event that a disabled person is required to access any of these facilities, then full compliance with the ADAAG shall be provided.

INTERPRETIVE MEMORANDUM 2002 - 02

To: Licensed Architects
Licensed Engineers
Licensed Sprinkler Contractors
Licensed Fire Alarm Contractors
Licensed Fire Suppression Contractors
Felicia Cooper, Administrator - Inspections
Stephen Gogreve, Manager
Boyd Petty, Manager
Pat Day, Supervisor of Health Care Inspections
Plan Review Staff

From: Jean Carter, Architect Supervisor
Henry Reed, Architect Supervisor
Don Zeringue, Architect Supervisor
Fidel Fremin, Architect Supervisor

Approved: Mark Gates,
Deputy Assistant Secretary/Chief Architect

Date: January 28, 2002

Re: **Tents and Canopies in Industrial Facilities**

General Requirements:

- Tents **shall** comply with the most recently adopted edition of NFPA 101, Life Safety Code, unless modified by the following.
- All tent and canopy fabric shall be flame resistant as demonstrated by testing in accordance with NFPA 701. The requirements of NFPA 102 for 'tension membrane structures' will not apply to tents in industrial facilities.
- There shall be at least a 15 ft. separation between the walls of adjoining tents. Tents with less than 15 ft. of separation shall be considered as a single tent for the purposes of review exemptions and submittals.
- Electrical facilities associated with tents and canopies shall comply with NFPA 70. Fully enclosed tents and tents used at night shall be provided with interior illumination. Tents shall not require emergency lighting if occupied only during daylight hours.
- All tents larger than 300 sq. ft. in area shall have at least two remote exit doors, openings, or flaps. Flaps secured with ties or zippers on the opening closures will be acceptable and must remain unfastened or must be secured in the open position when the tent is occupied.
- Due to the use of fabrication, storage, and lunch tents located within industrial facilities by able-bodied personnel, these facilities will not be required to meet the ADAAG requirements

Appendix C-
Safety Plan Worksheet

Company Name:	
Project:	
Westlake Contract Monitor's Name:	
Westlake HSE Representative:	

Occupational Medical Provider:	

Key Contacts			
Role	**Contact Name**	**Cell Phone Number**	**Email Address**
Home Office			
Job Superintendent			
Site HSE Representative (Days)			
Site HSE Representative (Nights)			
Corporate HSE Contact			

	Safety Plan Checklist
	Safety Policy Statement, signed by the principal officer of the company, describing HSE goals
	Name, qualifications, and duties of Safety Representative; Resume may be included (Level 1/2?)
	Hazard Communication Program
	Respiratory Protection Program
	Fall Protection Plan
	Training Programs including all programs listed in Section 6.6.1.2.6 of HSP-325
	Name and qualifications of excavation competent person
	Name and training certification of First Aid, CPR/AED designee
	Process by which the project will be internally inspected for HSE deficiencies
	Safety Meeting Program
	Disciplinary Action Program
	Analysis of hazards anticipated with job tasks
	Emergency Response Plan

Appendix D –

ISNetworld Requirements Variance

Name of Company*:

Company Contact Name*:

Phone Number: **Business:** **Cell:**

Address: **City, State:** **Zip Code:**

Westlake Contact*: **Phone Number:**

Westlake Facility: **Plaquemine** **Variance Expiration Date*:**

Describe Scope of Work*:

Reason for ISN Variance*:

Evaluation of Deficiencies*:

State additional controls to ensure mitigation of key risks noted above*:

1.

2.

3.

It is expected that additional risks, if any, associated with this variance are managed, and that where possible the variance will be replaced by achieving a dashboard grade of either 'A' or 'B' status.

Your signature below confirms that you are authorizing the contractor to perform the scope of work at this facility without meeting all of the minimal requirements.

HSE Department Review

All ISN Variances

Name: ____________________________ **Title:** _____________________________

Signature: ________________________ **Date:** _____________________________

HSE Manager Approval

All ISN Variances

Name: ____________________________ **Title:** _____________________________

Signature: ________________________ **Date:** _____________________________

Procurement Approval

Insurance Variances only, not granted through ISN

Name: ____________________________ **Title:** ______________________________

Signature: ________________________ **Date:** _____________________________

Site Management Approval

ISN Variances for "F" Grades, excluding insurance

Name: ____________________________ **Title:** ______________________________

Signature: _________________________ **Date:** _____________________________

Appendix E -
Non-Conformance Form

Axiall, A Westlake Company
SERVICE PROVIDER
NONCONFORMANCE FORM

SERVICE PROVIDER:
CONTACT: PHONE:
DATE WRITTEN: WRITTEN BY:

SERVICE: ____________________________ **DATE RECEIVED:** __________________

AXIALL P.O. NO: ______________________________________

NONCONFORMANCE DESCRIPTION: ____

____

____

____

SERVICE PROVIDER MUST COMPLETE THE FOLLOWING SECTION(S) THAT APPLY:

- ❑ **CORRECTIVE ACTION (What did you do to correct this occurrence?):**

____

____

____

____

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____

- ❑ **PREVENTIVE ACTION (IF NEEDED) (What did you do to keep this from reoccurring?):**

____

____

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____

PRINT NAME: ___________________ **DATE:**______________ **SIGNATURE:**________________

RETURN COMPLETED FORM TO: **FAX NO.:**

Purchasing Rep: Closeout: ____________________________ ***DATE:*** ____________________

Appendix F - Post-Job Evaluation Form

Question #	Question	Response	NA
1	Project Name		
2	Start Date		
3	End Date		
4	Westlake Contract Monitor		
5	Evaluation Conducted by (Name & Title)		
6	Meeting Date		
7	Total Man Hours Worked		
8	Total First Aid Cases		
9	Total Restricted/Job Transfer Cases		
10	Total Lost Time Cases		
11	Total Property Damage Cases		
12	Number of Recordables for Project		
Response Options: Unacceptable, Improvement Needed, Met All Requirements			
13	Commitment to Health and Safety		
14	Quality of On Site Supervision		
15	Quality of Onsite Safety Representative		
16	Reporting of Injuries/Incidents		
17	Participation in Accident Investigation		
18	Timely Submittal of Written Investigation Reports		
19	Compliance to Site Safety Rules		
20	General Hazard Control		
21	Use of PPE		
22	Compliance with Permit Process		
23	Response to Safety Requests		
24	Housekeeping Practices		
25	Response to Housekeeping Requests		
26	Condition of Tools and Equipment		
27	Knowledge and Usage of Tools and Equipment		
28	Participation in Emergency Drills		
Response Options: On Budget, Over by up to 9.99%, Over by >10%			
29	Ability to Meet Budget Requirements		
Response Options: Yes/No			
30	Attended Contractor Safety Meeting		
31	Plant Entry Requirements Met		
Response Options: Unacceptable, Improvement Needed, Met All Requirements, Exceeded Expectations			
32	Overall Rating		
Response is Optional			
33	Safety Comments		
34	Commercial Comments		
35	Maintenance/Project Comments		

Appendix G – PPE Matrix

MINIMUM PROTECTIVE CLOTHING REQUIRED FOR POSSIBLE CHEMICAL CONTACT[1]
Plaquemine Master List PPE MATRIX

CHEMICAL NAME	Chemical Protective Clothing				Respiratory Protection[2]			Face/Eye Protection[2]	Chemical Gloves						Chemical Boots
	CPF3 or Z300 w/ hood[3]	Tychem SL w/ hood	Tyvek Coveralls- "paper suits"	Chemical Slicker w/ hood	Supplied Air (SAR/SCBA)	Air Purifying[4] (full-face)	Disposable N-95 Filtering Facepiece	Mono-goggles[5] and Faceshield	Nitrile (Best #730)	Neoprene (Best #6780)	Butyl (Best #878)	Viton-Butyl[6] (Best #890)	PVC (Best #614R)	Durable Work Gloves	PVC or Neoprene Boots
Acetone	X					X		X		X	X	X			X
Nalco 7468 Anti Foam								X	X						X
AF-12 Antifoam				X				X	X						X
Alpha-Methyl Styrene	X					X		X		X		X			X
AM 26				X				X			X				X
Anhydrous Ammonia		X			X			NA	X	X	X	X			X
Benzene	X				X			NA				X			X
Boiler Treatment (Nalco 1742)								X	X						X
Caustic Soda (Sodium Hydroxide)		X				X		X	X	X	X	X	X		X
Chlorine - liquid	X				X			NA				X			X
Chlorine - gas		X			X			NA	X	X	X	X			X
Nalco 3DT177				X				X	X						X
Nalco 3DT190								X	X						X
Cumene	X					X		X	X			X			X
Cumene Hydroperoxide	X				X			X			X	X			X
Ethylene (gas)					X			NA				X			
Ethylene Dichloride (EDC)	X				X			X		X	X	X			X
Evicas 90		X						X	X						X
Freon		X						X	X						X
Glycomul				X				X	X						X
Hydrated Lime			X				X	X		X					X
Hydrochloric Acid		X				X		X	X	X	X	X	X		X
Hydrogen/Natural Gas					X			NA						X	
Methocel Dispersants		X						X	X						X
Nitrogen					X			NA						X	
OS-1								X	X						X
OS-2002								X	X						X
P-14				X				X		X					X
Phenol	X					X		X		X	X	X			X
Phenol Heavy Bottoms		X						X		X					X
Phosphate (Ammonium Polyphosphate)								X	X						X
Plant Air								X						X	
PVA Dispersants (Alcotex)		X						X	X						X
PVC Slurry (Stripped)				X				X	X						X
PVC Slurry (Unstripped)				X	X			X	X			X			X
PVC Resin			X					X						X	
Tris (2-chloroethyl) amine	See "VCM Liquid Phase Direct Chlorination Area Safe Work Program" for information on Chemical PPE														
RO-5				X				X	X						X
Sanitary Waste Water (Biohazard)		X						X	X						X
Soda Ash			X				X	X		X					X
Sodium Hypochlorite (Hypo)		X						X	X	X					X
Sodium Nitrite (solution)		X						X	X						X
Sodium Sulfite (15%)		X						X	X						X
Sodium Thiosulfate (30%)		X						X	X						X
Steam Condensate				X				X	X	X	X	X	X	X	X
Sulfuric Acid		X				X		X	X	X	X	X	X		X
Trichloroethylene (TCE)	X				X			X				X			X
Vinyl Chloride - Liquid		X			X			NA	X		X	X			X
Vinyl Chloride - Vapor					X			NA	X		X	X			
Water[7]				X				X	X	X	X	X	X	X	X

[1] When chemical hazards cannot be controlled by employing effective engineering and/or administrative controls, appropriate personal protective equipment (PPE) may be used. The personal protective equipment requirements provided in this table are based on the assumption that process piping, equipment and vessels last containing a hazardous material may not be empty and have not been decontaminated. PPE shall not be downgraded until the line openings are completed and a Cleared Process Confirmation has been completed by operations. Some routine operations/maintenance tasks may warrant a lesser level of PPE than what is specified in this table and may be downgraded if a PPE hazard assessment supports the decision. Physical hazards (i.e. electrical, thermal, cut, abrasion, vibration, etc.) should also be considered when selecting appropriate PPE.

[2] All line opening tasks will be evaluated on an individual basis to determine the necessary level of respiratory protection. Based on an assessment, a full-face piece air purifying respirator may be acceptable for routine operations/maintenance tasks. If a hazard assessment determines that the recommended respiratory protection is not necessary, both a faceshield and monogoggles are required to be worn for liquid splash

[3] Dupont Tychem CPF3 and Kappler Zytron 300 (Z300) suits provide equivalent chemical protection and can be interchanged.

[4] The correct air-purifying cartridge must be selected for the potential hazard(s). The user must consider the physical state andconcentration of all chemical agents involved as well as environmental conditions. (Contact a Westlake industrial hygienist for assistance or upgrade the respiratory protection to supplied air if there is any uncertainty.) Discard cartridges immediately after use or according to a written change-out

[5] Monogoggles should be non-vented or have indirect vents (vent covers and/or baffles that preventing straight-line passage of liquids into the goggles). Monogoggles shall be adjusted so that they seal tightly against the face. N/A means that eye and face protection are provided by a full-face piece respirator. If determined by a Risk Assessment that respiratory protection is not needed, then monogoggles and face shield are

[6] Users should be cautioned in using gloves made of a Viton/butyl rubber laminate as some chemicals (i.e. acetone) may cause severe swelling of Viton but has little effect on the butyl rubber.
This may cause permament damage to the gloves.

[7] The composition of any water involved in a line opening must be taken into consideration. For potable water, a rain suit is acceptable.