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Project Hazardous Work Permit Procedure

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1.0 PURPOSE

The purpose of this Procedure is to establish the requirements of using a Hazardous Work Permit (HWP) to plan, control, and document hazardous work. This procedure applies to all Project work in areas or for activities for which an HWP is deemed necessary.

2.0 SCOPE

The scope of this procedure applies to all works performed under all Government Construction Contracts executed throughout the Kingdom of Saudi Arabia.

3.0 DEFINITIONS

Definitions	Description
CTO	Contract Task Order
HWP	Hazardous Work Permit
HSSE	Health, Safety, Security and Environment
JHA	Job Hazard Analysis
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
PTW	Permit To Work
SCBA	Self-Contained Breathing Apparatus
STARRT	Safe Task Analysis and Risk Reduction Talk
WBS	Work Breakdown Structure
WMS	Work Method Statement

4.0 REFERENCES

- OSHA 29CFR 1926 Safety and Health Regulations for Construction.
- EPM-KSS-PR-000001 - Project General Safe Working Requirements Procedure.
- EPM-KSS-PR-000003 - Project Personal Protective Equipment Procedure.
- EPM-KSS-PR-000007 - Project Confined Space Entry Procedure.
- EPM-KSS-PR-000022 - Project Non-Destructive Examination Procedure
- EPM-KSS-PR-000031 - Project Lockout/Tagout Procedure
- EPM-KSS-PR-000032 - Project Excavation and Trenching Procedure.
- EPM-KSH-PR-000009 - Project Asbestos Management.

5.0 RESPONSIBILITIES

Leadership is the single largest factor for success in the establishment of an illness and injury-free workplace. By their actions, leaders cascade, manage and drive execution, instill operational discipline, and work to ensure that the entire workforce complies with Safety and Health requirements.

5.1 Project Manager

The Project Manager is responsible for ensuring the resources and arrangements are available for the implementation and management of this procedure.

5.2 Site Manager

The Site Manager is responsible for overall Construction Management of the site and monitoring so that the site follows the requirements of this procedure. Other responsibilities include the allocation of sufficient resources to implement, develop, and maintain effective safe plans and procedures.

5.3 Project HSSE Manager (or Designee)

The Project HSSE Manager is responsible for the following:

- Providing technical advice and guidance.
- Reviewing Subcontractor Hazardous Work procedures for Project activities.
- Verifying that potential worker health exposures are identified and evaluated, and appropriate mitigations are implemented to eliminate hazards and protect workers.
- Ensuring that monitoring equipment to be used by the HSSE Department is maintained and controlled.
- Evaluating work areas for effective controls and protection.
- Assessing the Project's compliance with the requirements of this procedure.

5.4 Contractor Superintendents

Contractor Superintendents are responsible for the following:

- Confirming that subcontractor's risk assessments address potential worker exposure to risks are identified and that procedures and job hazard analyses (JHAs) are developed.
- Coordinating site activities to minimize exposure and control work areas that require special controls or protective measures to protect worker health.
- Coordinating with Subcontractors to plan the work to limit the need for special controls or special health protection.
- Confirming that adequate signs, barriers and lighting are provided around areas where hazards may exist.
- Confirming that safety related information regarding health hazards is communicated to affected personnel.
- Pre-work safety briefings in random safety task analysis / risk-reduction talk (STARRT) meetings Subcontractor.
- Shall provide and maintain equipment required to implement controls and protect workers.

5.5 Subcontractor Supervisors

Subcontractor Supervisors are responsible for the following:

- Shall coordinate site activities to minimize the amount of potential exposure and reduce the number of personnel involved in such activities.
- Plan the work as far as practicable to limit the need for special controls and protective measures.
- Coordinating specific work activities to avoid other activities occurring in an area requiring specific health controls; ensure that signs, barriers, adequate lighting are provided; verify that other superintendents and other subcontractors have been informed when and where activities with special health controls will occur.
- Ensure that adequate barriers , signs and lighting are provided around areas where Hazardous substances may present health hazards.
- Ensure that risk assessments and JHAs address any hazards posed by potential exposure to hazardous substances and /or related to the nature of the work.
- Provide safety related information regarding occupational health hazards relating to specific work activities to affected personnel.
- Verify the implementation of requirements for a task as identified in the Risk Assessment, permit-to-work (PTW), JHA, etc.

5.6 Project Personnel

All Project personnel are responsible and accountable for complying with the requirements set forth in this Procedure. In addition, all Project personnel are responsible for the following:

- Accepting individual responsibility for their own safe behavior, as well as the safety and security of others around them, and executing their work in an environmentally responsible manner.
- Immediately reporting incidents, injuries, illness, and near-misses to their Supervisor.

6.0 RISK ASSESSMENT

An integral aspect of the work planning process is the performance of an adequate risk assessment. Risk Assessments must be conducted at the Planning Stage to identify the hazards, evaluate the risks and determine control measures. These are used as part of the Work Permit Process to ensure that all controls are in place prior to commencing the task.

The Risk Assessments that shall be conducted at the Planning Stage are as follows:

- Project Risk Assessment.
- Work Method Statements (WMS)
- Job Hazard Analysis (JHA).
- Safety Task Analysis and Risk Reduction Talk (STARRT).

It is imperative that prior to beginning any work activity, a STARRT briefing occurs to discuss the contents of the WMS/JHA which includes mitigations for any other hazards noted by the crew at the jobsite. The discussion shall also include job steps, expected hazards associated with the activity, and the mitigation and protection methods that shall be implemented to prevent incidents.

The Hierarchy of control shall be used to reduce the likelihood of an incident occurring.

- ***Elimination*** (Remove the Hazard)
- ***Substitution/Isolation*** (Replacing material, process or hazard with a lower risk one/separate people from the hazard, use suitable guarding, distance, etc.)
- ***Engineering Controls*** (Redesign or replacement of plant and equipment)
- ***Administration Controls*** (Procedures, training, signage)
- **PPE**

No work is to commence until the above has been implemented and signed by the relevant Supervisor in charge.

7.0 REQUIREMENTS

Generally, the HWP is required for tasks that pose an increased risk of serious injury or illness, and controls against those hazards must be emphasized.

Examples of activities that require a permit include:

- Chemical, biological, or radiological exposure of significant risk.
- Physical hazards, such as work near or over deep water.
- Electrical hazards, such as high voltage.
- Fire/explosion hazards, such as welding (or other hot work) near flammable containers.
- Confined space entry.
- Tank sampling.
- Asbestos work.
- Work in remote areas.
- Earth drilling on waste sites.
- Earth drilling where hazardous materials may be discovered.
- Operation of chippers and other similar equipment.

In addition, the HWP is also required for any work determined by the HSSE Representative to be significantly hazardous.

7.1 Other Procedural Controls and Permit Requirements

Some hazardous activities are controlled by specific Procedures. These include but are not necessarily limited to:

- EPM-KSS-PR-000032 - Project Excavation and Trenching Procedure.
- EPM-KSH-PR-000009 - Project Asbestos Management.
- EPM-KSS-PR-000007 - Project Confined Space Entry Procedure.
- EPM-KSS-PR-000031 - Project Lockout/Tagout Procedure

In such cases where the subject hazardous activity is controlled by a procedure that requires the use of a permit system, the controlling procedure and its requirements will be met and the requirements of this Procedure will supplement the controlling procedure.

The HSSE Representative will determine if it is necessary to complete both the HWP and the governing procedure permit requirements.

7.2 HWP Issue and Control

- The HWP requestor or HSSE Representative will complete the work description information section (Attachment 1).
- The HSSE Representative will complete the sections for hazardous conditions, site surveys, required PPE, monitoring, and special instructions.
- The HSSE Representative will retain the HWP until the facility is ready for work and any required permits, clearances, or other items are complete.
- The HSSE Representative will then approve the HWP.

7.3 Distribution

- A Project logbook will be used to number all issued HWPs in sequential order.
- A copy will be available for each subcontractor and work crew.
- The HSSE Representative will retain the hard copy of the HWP in the Project files.

7.4 Termination

The HSSE representative will terminate the HWP when any of the following occurs:

- Work task is complete.
- HWP expiration date has been reached.
- Requirements set forth in the HWP are not effective.
- Working conditions change.
- Scope of work is changed.

At termination, the HWP and all personnel entry logs will be retained for Project records.

7.5 Field Changes

- For minor field changes, the HSSE Representative can alter/line-out the item to be deleted and initial and date the change with the approval from the Site Supervisor.
- For significant changes, the HWP will be terminated and a new one will be issued.

7.6 Facility Briefings

The HWP will be reviewed with entry personnel prior to work and periodically thereafter by the immediate supervisor and by the HSSE Representative.

8.0 USE OF THE HAZARDOUS WORK PERMIT

The HWP is a document that describes Safety and Health requirements on a single page. The HWP may be used to:

- Specify the requirements for a single task on a Project.
- Prescribe various levels of personal protection equipment (PPE).
- Serve as an abbreviated form of an HSSE Execution Plan for limited, one-time, or short-duration activities.
- Supplement the HSSE Execution Plan for initial facility visits.
- Supplement instruction guides/work instructions.
- All operators shall be certified for particular powered industrial trucks from recognized third party

HWPs are used to control work that has several steps with prerequisites such as utility clearances or hot work permit requirements.

The HSSE Representative will not release the HWP until the required clearances are received and prerequisites complete. These require to be verified by the Supervisor in charge of the task.

9.0 ATTACHMENT

1. EPM-KSS-TP-000020 - Hazardous Work Permit Form Template
2. EPM-KSS-TP-000021 - Project Hazardous Work Permit Register Template
3. Project Hazardous Work Permit Instructions

Attachment 1 - EPM-KSS-TP-000020 - Hazardous Work Permit Form Template

WORK DESCRIPTION	WORK LOCATION
	EST. START DATE
	REQUESTED BY
	REQUEST DATE
	SITE SURVEYS

HAZARDOUS CONDITIONS	TYPE	NUMBER	DATE	BY

REQUIRED PERSONNEL PROTECTIVE CLOTHING AND EQUIPMENT

HEAD/EYES	FEET	HANDS	BODY	RESPIRATORY
SAFETY GLASSES ☐ GOGGLES ☐ FACE SHIELD ☐ HARD HAT ☐	RUBBER BOOTS ☐ PLASTIC BOOTS ☐ HIP WADERS ☐ STEEL-TOED SHOES ☐ DISPOSABLE SHOE COVERS ☐	COTTON GLOVES ☐ LATEX GLOVES ☐ RUBBER GLOVES ☐ NEOPRENE GLOVES ☐ SURGICAL GLOVES ☐ POLYVINYL ALCOHOL ☐ LEATHER GLOVES ☐	COVERALL/COTTON ☐ COVERALLS/TYVEK ☐ (REGULAR) COVERALLS/TYVEK ☐ (SPECIAL: STATE TYPE) TYPE RUBBER SUIT ☐ ACID SUIT ☐ RAIN SUIT ☐ MOON SUIT ☐	HALF-FACE ☐ (NEGATIVE PRESSURE) FULL-FACE ☐ (NEGATIVE PRESSURE) POWERED AIR PURIFYING ☐ SPECIFY CARTRIDGE/ CANISTER TYPE: SUPPLIED AIR HOOD ☐ SANDBLAST HOOD ☐ SELF CONTAINED (SCBA) ☐

SPECIAL INSTRUCTIONS		MISCELLANEOUS
WATCHMAN ☐ ELECTRICAL LOCKOUT ☐ PRE-ENTRY MONITORING ☐ EMERGENCY EQUIPMENT ☐	"BUDDY SYSTEM" IN EFFECT ☐ JOB COVERAGE BY SAFETY PROFESSIONAL ☐ SPECIAL TRAINING REQUIRED ☐ NOISE MONITORING ☐	TAPE GLOVES AND BOOTS TO COVERALLS ☐ LIFE LINE ☐ SAFETY BELT ☐

RADIATION DOSIMETRY	INDV.	GROUP
TLD BADGE EXTREMITY TLD SRD 0-200 mR SRD (HIGH) DIGITAL ALARMING DOSIMETER		

I.H. MONITORING	INVD.	GROUP

EXPIRATION DATE

APPROVALS	DATES	TERMINATION	DATES
HSSE Representative		HSSE Representative	
CONSTRUCTION SITE MANAGER		CONSTRUCTION SITE MANAGER	
		REASON	

Attachment 2 - EPM-KSS-TP-000021 - Project Hazardous Work Permit Register Template (Attach to Form)

DATE			LAST NAME	INITIALS	TIME IN	TIME OUT	HWP NO.	SIGN TO ACKNOWLEDGE UNDERSTANDING OF HWP REQUIREMENTS
MO	DA	YR						

Attachment 3 - Hazardous Work Permit Instructions

HWP Completion Instructions

Work Description	Identify the task or tasks to be performed under the HWP (e.g., install monitoring well, collect samples at well site 3x, 34, 32)
Work Location	Identify the site or sites for this work
CTO No.	Identify the CTO (contract task order)
HWP No.	Sequence number for this CTO
Requested by	The individual in charge of these tasks
Request Date	Date the HWP is requested
WBS	The WBS for the tasks
Chemicals Present	List the principal chemical hazards
Radiation	Identify any radionuclide or radiation hazard information known
Other (Safety)	Identify any unique safety hazards (e.g., open trench, work over water, biological hazards)
Site Surveys	Identify expected air concentrations, radiation levels, prior monitoring results
Required PPE	Indicate the general PPE levels A, B, C, Mod D or D; complete the PPE ensemble required for the work

Hazardous Conditions - HWP Special Instructions

Mobile Phone	Check if hard line phones are not available within 5 minutes
Remote Site	Check if first aid/medical transport is greater than 30 minutes away
Standard First Aid	Check for all other field activity
Engineering Controls	List Engineering control required to conduct work
Emergency Plan Req.	Check if an emergency plan is required. A minimal emergency plan is prepared by completing sections D and E.
Access Log	Check to denote that a record of each site entry is required; otherwise, a one-time record of personnel entering the site will suffice
Medical Surveillance	Check if the government medical surveillance requirements apply
HAZWOPER Training Req.	Check if the government HAZWOPER Training is required for facility entry
Special Training	Check if any special training is required
Standby SCBA	Check if SCBA equipment is necessary as an emergency measure
Spill Control Kit	Check if activity could result in spill of any, significant quantities of hazardous materials
Contact SHM Prior to Work	Check if the work requires SHM involvement, pre-project briefing, or SHM awareness immediately prior to start of activity
Site Control (3 zone)	Check if the standard 3-zone site control system is to be used
Site Control (1 zone)	Check if a one-zone site control system is to be used
Emergency Decon Kit	Check if personnel could be subject to contamination with product, fuels, acids caustics, or corrosives in high concentrations
Minimum Decon	Check to denote a simple washing of equipment and exposed skin
Standard Decon	Check to denote a standard decontamination area and three-station wash
Vehicle Decon	Check if vehicle decontamination is required
Fencing	Check if barrier fencing is required
Barricade Tape	Check if barricade tape is required
Contain Decon Solution	Check if decontamination solution is to be drummed on facility
Shower Required	Check if a shower facility or use of a shower is required as part of decontamination protocol
Pre-existing Monitoring	Check if monitoring is required before personnel begin work or enter an area
Buddy System Required	Check for work in levels A, B, or C, confined space entry or other higher hazard tasks
Portable Radio	Check if workers will be dispersed beyond voice or audible signaling

Eyewash Station	Check if a pressurized (15-minute duration) eyewash is required due to potential for free product, caustics, acids or corrosives in hazardous concentrations
Hot Work Permit	Check if a permit is required for welding, entry to classified spaces, tank farms or similar areas
Excavation Permit	Check if personnel may enter excavations greater than 4 feet deep
Confined Space Permit	Check if personnel may enter sewers, tanks, or excavations greater than 4 feet deep or other confined spaces
Tagging Lockout	Check if personnel enter equipment or machinery areas where they may be exposed to accidental release of energy, or work under power lines where clearance cannot be maintained
Fire Extinguisher	Check for all work involving vehicles, fuel, off-road work, etc.
Standby Observer	Check for confined space work, supplied air work, etc.
Utility Clearance	Check for all subsurface work
Monitoring	Indicate the type of monitoring required and indicate if individual (personnel) or group (area) monitoring, or both are required
Radiation (a)	Indicate if a radiation dose rate or scintillation scan is necessary
Contamination (b-a)	Indicate if beta-gamma contamination surveys are required
Contamination (a)	Indicate if alpha contamination surveys are required
Dosimeter (b-a)	Indicate if a film or TLD-type radiation badge is required