

Marathon Petroleum Company LP		
Contractor Safety Procedure	Document No.: RSW-SAF-060-DT	Approval Date: 9-24-19
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1.0 PURPOSE

- 1.1 This document provides guidelines to:
- Reduce and/or eliminate potential hazards, such as the containment of hazardous chemicals within a covered process, and/or at-risk behaviors associated with Contractors or Marathon Petroleum Company, LP (MPC) employees performing maintenance or repair, turnaround, major renovation, or specialty work on, or adjacent to, a covered process,
 - Ensure Contractors are knowledgeable of applicable Health, Environment, Safety and Security (HES&S) procedures and federal and state regulations,
 - Promote a safe working environment for both contract and MPC employees, and
 - Improve Contractor safety performance.
- 1.2 **Strict adherence to this standard is a primary condition of employment at the Detroit Refinery.** Contractors and Subcontractors must adhere to all legally mandated and generally accepted practices and standards of safety and workmanship. MPC may execute the default and termination provisions of the Contract, suspend work or terminate a job order at any time for failure to perform this or other applicable work instructions or for a pattern of frequent failure to perform as stated in the safety policies, procedures, rules and regulations.

2.0 SCOPE

- 2.1 This procedure applies to all Contractors and Subcontractors, working on Michigan Refining Division (MRD) owned and operated facilities.

3.0 GUIDELINES

3.1 General Guidelines

- 3.1.1 Comply with all applicable federal, state, local, and MPC regulations and requirements.
- 3.1.2 MPC reserves the right to review work sites to ascertain that safety practices are in accordance with applicable regulations and MPC standards. Such reviews will not constitute an acceptance of the Contractor's practices nor will they relieve the Contractor of responsibility for the safety and health of its employees.
- 3.1.3 Contractors may determine their own safety practices and procedures for performing tasks within their areas of expertise, provided they are in compliance with MPC safety requirements. Safety practices or procedures used by Contractors for unique situations must be reviewed with their MPC Coordinator before work begins.
- 3.1.4 The MPC Coordinator verifies all incoming chemicals onsite are approved.

Note: Refer to RSW-SAF-026-DT [Catalyst and Chemical Change Procedure](#)

3.1.5 The following table describes the minimum number of Contractor Safety Representatives on a company-by-company basis. These numbers are based on the total number of employees a Contractor has working in the plant. MRD reserves the right to require more Safety Professionals depending on the scope of work. MRD Safety reserves the right to review the Contractor's scope of work and the Safety Professional's certifications. MPC reserves the right of refusal, to proposed Safety Professionals (e.g. due to lack of pertinent qualifications, lack of pertinent experience, etc.).

Important: Contractors must complete the Variance Form per RSW-SAF-018-DT [Safety Procedure Variance and Exception Guidelines](#) for any Contractors requesting a deviation from this rule.

3.1.5.1 Table 1.0 below describes Representation:

See section 3.15.3 TAR Safety Coverage/Oversight for Minimum # of Safety Representatives during Turnarounds.

Table 1.0

# of Contractors	Minimum # of Safety Representatives
0 – 30	0
31 – 60	1
61 – 150	2
151 – 400	3
400+	Negotiable

3.2 Contractor Safety Pre-Qualification Process

3.2.1 The safety pre-qualification process provides a systematic method for evaluating Contractors' safety programs and historical performance. Only those Contractors who have demonstrated management leadership and systems resulting in superior safety performance are used.

3.2.2 An initial Contractor Pre-Qualification Questionnaire completed by the Contractor is submitted directly to ISN. Subcontractors must also complete the ISN review. The results from the ISN evaluation are used to determine if the Contractor/Subcontractor meets established minimum safety requirements for working in the refinery. [Appendix B](#) of the Contractor Safety Management Standard, Common Evaluation Criteria, outlines the requirements for contractors.

3.2.3 The table below (2.0) describes the [Common Evaluation Criteria](#) based on the specified category:

Table 2.0

Category	Requirement
ISN Rating	The Contractor should achieve an ISN score greater than or equal to the current Marathon Common Evaluation Criteria.

MIOSHA/OSHA Citations/Fatalities	The Contractor is disqualified if they had a fatality or willful violation within the last three years related to the type of service being requested by MPC.
MIOSHA/OSHA Incident Rate	The Contractor's most recent three-year average MIOSHA/OSHA incident rating must be below an industry average MIOSHA/OSHA Incident Rating, based on Marathon Common Evaluation Criteria.
Worker's Compensation Experience Modification Rate (EMR)	The Contractor's most recent year average EMR must be less than current Marathon Common Evaluation Criteria.

- 3.2.4 ISN notifies the Contractor of the results of the Safety Pre-qualification Evaluation via e-mail.
- 3.2.5 Contractor Temporary Approval Requirements
 - 3.2.5.1 If the Contractor Initiator determines it is necessary to use a Contractor that does not meet the Marathon Common Evaluation Criteria, then the Contractor Temporary Approval process may be used.
 - 3.2.5.2 The length of term for a Contractor Temporary Approval is dependent upon the Qualification Criteria not met, as indicated on the Contractor Temporary Approval Form.

Table 3.0- Temporary Approval Terms

Criteria Not Met			1	Ad
OSHA Willful Citation, Fatality related to services provided and ISN Health & Safety Audit Score			1	18

OSHA Incident Rate and Experience Modification Rate		1	12
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3.2.5.3 The Contractor Initiator completes the SAF4004DNAppD [Contractor Temporary Approval Form](#) that must be approved by the HES&S Manager and the Division Manager. Global Procurement (GP):

- Updates the SAP Database,
- Sends a copy to Corporate Safety, and
- Files the original form in the Contractor's file.

3.2.5.4 A completed SAF4004DNAppD [Contractor Temporary Approval Form](#) must include safety management controls, not limited to:

- Full-time MPC oversight of Contractor operation,
- A Contractor-provided Safety Professional
- Additional administrative controls on Contractor access and operations (i.e., additional permitting, etc.).

3.2.5.5 The Contractor Initiator must include verification documents with the original Contractor Temporary Approval request:

3.2.5.5.1 Verification of minimum selection criteria may be completed by attaching an ISN summary report, SAP summary report, or the following items:

- The Contractor's last 3 years of EMR data on insurance carrier letterhead
- A letter from the contractor identifying any regulatory citations received in the last 3 years.
- The Contractor's last 3 years of MIOSHA/OSHA 300 and 300A forms

3.2.5.5.2 Documentation proving that contractor employees have received necessary training must be attached with request.

3.2.5.5.3 Safety Data Sheets (SDS) must be attached with request, for any chemicals that the contractor will be bringing onsite.

3.2.5.5.4 Site Specific Safety Plan must be attached with request. This plan must include a detailed scope of work, methods of completing scope, risks of work, as well as mitigations that will be used onsite. Refer to RW-SAF-060-Form02-DT, [Temporary Approval Site Specific Safety Plan Template](#).

3.2.6 Contractor Safety Program Restriction Requirements

- 3.2.6.1 Contractors who will never perform services that require specific Safety Programs to be vetted by ISN, for any MPC organization, must waive these Safety Programs by:
- Completing a [Safety Program Restriction\(s\) Request Form](#), SAF4004DNAppC
 - Submitting the form to MRD Safety to be signed by the MRD HES&S Manager, and
 - Submitting the signed form to the Corporate Contractor Safety Qualification Team for final approval.
- Note:** These waivers will be granted globally across MPC Organizations.

3.3 Contractor Information (Pre-Work Activity)

- 3.3.1 All Contractors performing work at the refinery must have access to the Detroit Refinery's general Safety Procedures located on the [External Contractor Website](#). Contractors must enter the following information to gain access:
- User Name: *LifeCritical*
 - Password: *11Passport*
 - Name of the company

Note: All documents and/or procedures referenced in this procedure, but not accessible on the [External Contractor Website](#), may be requested from the Contractor's MPC Coordinator.

- 3.3.2** The Process Safety Management (PSM) Group verifies that all Contractors performing work on a PSM covered process have access to Process Hazard Analysis's (PHAs) as it relates to the work they are to perform.
- 3.3.3** All PSM Contractors must be informed of the known potential fire, explosion, toxic release, or unique hazards related to their work through the use of Process Hazard Overview Pamphlets, MRD Safety Orientation (DSO), and during pre-bid/job meetings. All Contractors must read the Process Hazard Overview Pamphlets prior to working in each respective unit.
- 3.3.4** Before a bid is submitted, the MPC Supervisor and/or Planner conducts a pre-bid meeting reviewing and discussing job plans, site-specific safety criteria, safety and health requirements, any unusual hazards, and/or specific safety concerns.
- 3.3.5** After the Job Order has been awarded, a pre-job safety meeting may be held. This meeting would include the MPC Supervisor/Coordinator/Planner, a representative of the MPC Safety Group, a specific MPC representative with expertise pertinent to the scope of work (e.g., Engineering, Maintenance, Environmental, etc.), the Contractor responsible for the planned work, and the Contractor Safety Supervisor (if the contract calls for a Safety Supervisor).
- 3.3.5.1 The pre-job safety meeting should review the job and discuss MPC's safety requirements. Safety practices or procedures used by Contractors for unique situations or associated with unique hazards must be reviewed with their MPC Coordinator before work begins. The MPC Coordinator and Contractor representatives must physically walk through the job.

- 3.3.6 Enroll employees who conduct safety sensitive services in the DISA Contractors Consortium (DCC). All contract employees are required to submit to a pre-employment and/or random drug screening. Post-accident drug screening may also be required. Failure to submit to these tests will result in dismissal from the refinery. Requirements of MPC's Drug and Alcohol Policy are specified in the services contract. Please refer to the [External Contractor Website](#) referenced in 3.3.1 for further information.

3.4 Site/Complex Access

- 3.4.1 All contract employees who work on MRD property, including delivery drivers and service contract employees who are not required to have an escort into the Detroit Refinery, must adhere to RDP-SEC-021-DT [Contract Employee Risk Management Program](#).
- 3.4.2 All personnel entering MRD property must adhere to RDP-SEC-002-DT [Facility Access \(General\) Procedure](#).
- 3.4.3 MRD Security uses the Lenel On-Guard Access Control System and makes proximity cards for all Contractors. The levels of access within the MRD will be determined by refinery management.
- 3.4.4 All Contractors must possess an identification proximity card (e.g., Restricted Contractor Badge, Visitor Badge, Contractor Badge, or Forgotten Badge) before entering the Detroit Refinery. Display the proximity card at all times while on company property.
- 3.4.5 The following are prohibited within the Detroit Refinery:
- 3.4.5.1 Illegal or non-prescribed controlled drugs
 - 3.4.5.2 Alcohol
 - 3.4.5.3 Firearms/Weapons
 - 3.4.5.4 Photography – Photography is prohibited unless a Camera Pass is authorized by MRD HESS/Security. [See RSW-SAF-Form1-DT Camera Pass](#).
 - 3.4.5.5 Beards - Truck drivers making deliveries or pickups are not covered by the facial hair policy. The appropriate Department Manager may approve exceptions to beards by completing [RSW-SAF-052-Form1-DT Beard Waiver](#).
- 3.4.6 Contract employees must return their proximity card upon completion of their on-site job assignment or termination. Proximity cards must be collected by the Contractor supervision and turned over to MRD Security. Failure to do so may result in the assessment of replacement charges.
- 3.4.7 All contract personnel must check in and out with the Area Operations personnel when entering or leaving a process area or tank farm area in accordance with RSW-SAF-068-DT [Process Unit Sign in & Sign out procedure](#).
- 3.4.8 Formal permission to work in the process units and tank farm must be secured with a Safe Work Permit before any work is started in accordance with RSW-SAF-006-DT [Safe Work Permits](#).

3.4.9 Permission to setup temporary laydown and/or fabrication areas must go through each company's Marathon Coordinator.

3.4.9.1 The area must be barricaded and tagged appropriately.

3.4.9.2 Areas lasting longer than 1 week must have a hard barricade.

3.5 Training

3.5.1 The Detroit Refinery expects all contract personnel to successfully complete all required training prior to commencing any work on MRD property.

3.5.2 All Contractors must ensure employees and Subcontractors are trained to safely perform their jobs and have received the following types of training:

3.5.2.1 Trade-Specific Training:

3.5.2.1.1 The Contractor:

- Determines the training requirements for each craft or labor classification provided to the refinery,
- Verifies employee completion of required training, and
- Maintains current documentation of training on all employees that work at the refinery.

3.5.2.1.2 Where required to hold and maintain licensing or certification boards; only employees holding the proper license or certification will be permitted to perform certain work at the refinery.

3.5.2.1.3 Where licensing or certification is not required, contractors may choose to verify training via apprenticeship programs.

3.5.2.2 State and Federal Regulatory Training:

3.5.2.2.1 All Contractors must ensure employees and Subcontractors have received initial training and maintain training for all state and/or federal regulatory requirements as outlined in each respective standard.

3.5.2.3 PSM training:

3.5.2.3.1 All Contractors working on or adjacent to a PSM-covered process must receive PSM training covering at least the following elements:

3.5.2.3.1.1 The properties of and hazards presented by the chemicals used in the process.

3.5.2.3.1.2 Precautions necessary to prevent exposure, including engineering controls, administrative controls, and Personal Protective Equipment (PPE).

3.5.2.3.1.3 The potential of fire, explosion, or toxic release hazards.

3.5.2.3.1.4 All applicable MRD HES&S standards with an emphasis placed on the applicable MRD Emergency Response Plan provided by the MRD Safety Professional/MPC Coordinator as needed.

3.5.2.3.2 The contract employer must:

- Document that each contract employee has received and understood the training as specified in the MIOSHA General Industry Part 91 and Construction Safety Standard Part 591, Process Safety Management,
- Prepare a record that is available to auditors and/or MPC Supervision upon request that contains the following:
 - Identity of the contract employee,
 - Date of training,
 - Means used to verify that the employee understood the training.
- Provide all new employees initial training at least every three years and more if the process changes.

3.5.2.3.3 PSM is discussed in the MRD DSO and covered in Process Hazard Overview Pamphlets available to all Contractors. The DSO and Process Hazard Overview Pamphlets do NOT constitute regulatory training for PSM.

3.5.2.3.4 Contractors performing PSM duties identified in other sections/elements of PSM-1070-DN [Process Safety Management](#) must be trained as defined in those sections or receive equivalent training.

3.5.2.4 Detroit Site Specific Orientations:

3.5.2.4.1 Detroit Safety Orientation (DSO): All contract personnel intending to work in process units or under a Safe Work Permit must successfully complete the DSO. Refer to RSW-SAF-023-DT [Safety Orientation Procedure](#).

3.5.2.4.2 Basic Safety Orientation (BSO): All contract personnel NOT intending to work under a Safe Work Permit while on-site at MRD (e.g., visitors, vendors, and delivery drivers) are required to view the BSO video. Refer to RSW-SAF-023-DT [Safety Orientation Procedure](#) (those who only visit the main office are excluded).

3.5.3 A training matrix detailing all training expectations must be documented, maintained, and stored on site by the contractor and made available to auditors and/or MPC upon request.

3.5.3.1 The training matrix must contain the following:

3.5.3.1.1 A list of positions available to employees and the training required for that position.

3.5.3.1.2 A list of training required by MRD beyond regulatory training. Trainings that fit this category include: Safety Orientation (MRD), Safety Leadership for Business Partners, Appropriate Use of Gloves (this can be included in PPE), Angle Grinder Training, etc.

- 3.5.3.1.3 A list of competent trained persons. This may include Silica Competent Person, Excavation Competent Person, Fall Protection Competent Person, Scaffold Inspector, Asbestos, Lead, Hearing Protection etc,
- 3.5.3.1.4 A list of Subject Matter Experts (SME) or Specialty Trained Employees. Examples of SME categories include: electrical, rigging/signal person, Respiratory/Fit Testing, etc. SMEs may vary from company to company.

- 3.5.3.2 The training log must contain the following:
 - 3.5.3.2.1 Identity of the contract employee,
 - 3.5.3.2.2 Date of training,
 - 3.5.3.2.3 Means used to verify that the employee understood the training.

3.6 Safety Meetings

- 3.6.1 Each Contractor must hold safety meetings for their employees. Minutes and attendance roster from all safety meetings are maintained by the personnel conducting the meetings. Safety meetings are as follows:
 - 3.6.1.1 MRD Safety conducts a MPC Directed Sequential Safety Meeting with Nested/Non-Nested Contractor Supervision (representatives from each Contractor) to discuss updates (e.g., procedure changes), questions, and concerns related to safety. This must be performed in accordance with the structured safety program, DRIVE Safety. Refer to RSW-SAF-009-DT [DRIVE Safety Manual](#). In addition, Contractor Management will be expected to attend this meeting on a quarterly basis.
 - 3.6.1.2 Nested Contractor Supervision are encouraged to conduct a Contractor Directed Sequential Safety Meeting monthly for their employees and sub-Contractors.
 - 3.6.1.3 Each Nested Contractor crew should begin each shift with a start of shift safety meeting.
 - 3.6.1.4 Each Contractor Safety Representative is expected to attend the MRD Detroit Armor Meeting.

3.7 Accident/Incident Investigation

- 3.7.1 Refer to RSW-SAF-072-DT [Owner Controlled Insurance Program \(OCIP\) Procedure](#)

3.8 Rentals / Equipment

3.8.1 All Contractor/Subcontractor equipment must be safe to operate and meet all federal, state, and local rules/regulations and meet MRD guidelines. Refer to RSW-SAF-011-DT [Aerial Work Platforms](#), RSW-SAF-016-DT [Equipment Inspection for Mobile Equipment/Maintenance Equipment](#), RSW-SAF-035-DT [Powered Industrial Trucks](#), RSW-SAF-029-DT [Rigging & Lifting](#), & RSW-SAF-001-DT [General Safety Rules](#) for more information.

3.9 Regulatory Inspections

3.9.1 In the event of regulatory inspection (MIOSHA, MDEQ, MDOT) at the facility to audit a Contractor, the Contractor's primary representative is notified. He or his designated representative meets the inspector. **The Contractor representative, MPC representative, and MPC HES&S representative must escort the inspector throughout their visit at all times.**

3.10 Audits

3.10.1 Contractor safety audits are intended to evaluate the performance of Contractors in fulfilling their obligations and to review a Contractor's adherence to MRD safety rules and procedures. The following are types of audits performed at the Detroit Refinery.

3.10.2.1 A Contractor Deep Dive Audit is to be completed on every Nested Contractor every three (3) years to evaluate the overall safety culture (e.g. safety recordkeeping, training content and documentation, safety programs, field performance, and employee knowledge). The review may take place at the Contractor's main office or onsite at the Detroit Refinery.

Audit findings must be shared with all affected parties.

3.10.2.1.2 When the work or job being completed requires special safety precautions or may present significant exposure to safety hazards, more frequent Contractor audits may be required.

3.10.2.1.3 When conducting an audit, the MPC auditor may be accompanied by a Contractor representative and, when possible, the MPC Coordinator and the MPC Safety representative.

3.10.2.1.4 The Contractor audit reports must be reviewed by the MPC Safety Group and discussed with the Contractor.

3.10.2.2 Contractor Annual Field Verification Audits are performed on all PSM Contractors. See [RSW-SAF-060-Form-01-DT Field Verification Checklist](#).

3.10.2.3 Life Critical Safety Audits will be performed by MRD Safety Professionals. The audits will be conducted on a monthly basis to evaluate MPCs Life Critical Safety Procedures (i.e., Fall Protection, LOTO, Confined Spaces, Safe Work Permit, Hot Work, Cranes, and Alky PPE).

3.10.2.4 Service Scorecards may be completed by MRD supervisors, coordinators, safety representatives, or planners to evaluate contractors'

performance. These audits are scored on a numerical system based on topics such as Safety, Quality, Competitiveness, Performance, and Environmental. To complete a Service Scorecard, MRD representatives must contact their Global Procurement (GP) representative via email with a request. Requests must include the name of the Contractor you will be scoring. The GP representative will create a new scorecard in the SAP system on the Contractor in question and add the MRD representative as a collaborator. The MRD representative will then receive an email with a link to the scorecard for completion in SAP.

3.10.2.4.1 Scorecards are considered in the contractor re-qualification process and contractors are subject to removal from the approved contractor list.

3.11 Emergency Response Plan

3.11.1 All contract employees must be informed of their duties during a refinery emergency. Unless the contract is specifically for emergency response services, Contractors are not to participate in emergency response actions.

3.11.2 The Emergency Response Plan consists of the following:

3.11.2.1 Contractors will report fires and/or other emergencies by stating their name and location of fire on appropriate channel of the plant wide radio system or by calling 313-297-6911. The Contractor's MPC Coordinator must also be contacted.

3.11.2.2 In case of an emergency evacuation, Contractors must be knowledgeable of and adhere to RSW-ERP-014-DT [Evacuation](#), which includes exit route assignments and mustering point maps. A procedure to account for all employees after evacuation must be in place.

3.11.2.3 In case of severe weather, Contractors must be knowledgeable of and adhere to RSW-ERP-012-DT [Emergency Response Plan – Severe Weather](#).

3.11.2.4 In case of a spill, the Contractor's MPC Coordinator must be notified, and Contractor must adhere to RSW-ERP-010-DT Oil Spills.

3.12 Disciplinary Action Plan

3.12.1 The Detroit Refinery requests the [Disciplinary Action Form](#) RSW-SAF-060-Form-01-DT be completed and submitted to the MRD Safety Group before the start of work within the refinery. A Disciplinary Action Form must be re-submitted annually.

3.12.2 The [Disciplinary Action Form](#) will be discussed and provided during the Pre-Bid Meeting for any new Contractor at the Detroit Refinery.

3.12.3 The MPC Coordinator and Safety Representative must be informed of all safety infractions by a Contractor representative.

3.13 Job Specific Safety Plans

3.13.1 In some situations (e.g., Projects containing a recognized serious safety or health hazard), contractors will be requested to submit a Job Specific Safety Plan. A Job Specific Safety Plan will emphasize how the Contractor will adequately protect the contract employees from hazards for a specific job from start to finish. Job Specific Safety Plans must be submitted via a hard copy or an electronic copy to the Contractor’s MPC Coordinator and the MRD Safety Group. Refer to RSW-SAF-060-Form05-DT, [Projects and TAR Site Specific Safety Plan Template](#). The SSSP Template for Projects and TAR will be used for all work starting January 14th 2015.

3.13.2 If work (routine or otherwise) includes any tasks that have the potential of respirable crystalline silica exposure a written exposure control plan must be submitted. Refer to [RSW-SAF-090-DT Silica Handling Plan](#) for more details.

3.14 Contractor Requirements for Emergency Work

3.14.1 If an emergency has been established use an MRD approved Contractor from SAP.

3.14.2 If an MRD approved Contractor is not available, coordinators must gain approval from their supervisor and complete approval process through the Division Manager and HES&S Manager to use a non-approved Contractor.

3.14.3 Contact the Global Procurement Manager to inform him/her of the use of a non-approved Contractor.

3.14.4 The Coordinator must fill out SAF4004DNAppD [Contractor Temporary Approval Form](#) and state “Emergency” along with an explanation under “Reason for Requesting Exception”. The coordinator must also complete a requisition order. Refer to section 3.2.8 for further of this document for further information on completing a Contractor Temporary Approval Form.

3.14.5 At a minimum, non-approved Contractors must go through the BSO and be escorted at all times. The standard rules regarding DSO and BSO still apply and exceptions must be approved by the Safety Supervisor.

3.14.6 The MPC coordinator will make sure that the Contractor has the required PPE for the job area.

3.15 Turnaround (TAR)

3.15.1 The following requirements shall be implemented based upon the complexity and size of each individual TAR. A collaboration of the Safety department and the TAR group will determine the necessary requirements for each TAR.

3.15.2 On-Boarding

3.15.2.1 Short-term

3.15.2.1.1 Face-to-Face safety orientation meetings with the contractor superintendents and available foremen (nested and travelers) must be held prior to the start of the TAR work. Meetings should include

an overview of safety roles and responsibilities, life critical safety procedures, injury reporting and management procedures, personal protective equipment (PPE) requirements, and safety meetings schedules. The refinery’s safety department would lead this training in cooperation with TAR and Detroit Leadership Team (DLT) with tracking mechanisms in place to ensure attendance by all contractors.

3.15.2.1.2 Face-to-Face safety orientation meetings with MPC and third-party TAR field coordinators to review safety expectations and requirements for the TAR. The refinery’s safety departments would lead these meetings with the intent of discussing safety procedures and requirements for the upcoming TAR.

3.15.2.2 Long-Term

3.15.2.2.1 Face-to-Face safety onboarding/orientation training for all contractor TAR personnel modeled after the Contractor SAFETY1 module. The refinery safety department in cooperation with the refinery training department will facilitate this training.

3.15.3 TAR Safety Coverage/Oversight

3.15.3.1 Each Contractor shall maintain a minimum ratio of safety professionals per shift according to the following table:

# of Contractors (Hands on Tools)	Minimum # of Safety Representatives
0 – 20	Dual Role
21 – 60	1
61 – 150	2
151 – 400	3
400+	TBD based on scope of work

3.15.3.1.1 Primary Contractors shall include all sub-contractor personnel in their overall “Hands on Tools” crew size headcount for determining the number of Safety Professionals required.

3.15.3.1.2 Based upon complexity of work and past performance the numbers may be adjusted with approval from the safety department.

3.15.3.1.3 Dual Role: If a contractor company has 20 or fewer individuals on-site they will not be required to have a dedicated Safety Professional. Those Contractors shall designate one person as a “safety representative” to act as a point of contact for the refinery Safety department and will be expected to attend all required meetings in addition to their normal job tasks.

3.15.3.1.4 The Lead Safety Professional shall meet the following criteria:

- (a) Minimum of an Associate Degree in Safety, or
- (b) 5 Years of Relative experience in safety, or
- (c) Safety Certification (e.g., CIH, CSP, OHST, CHST, CSST).

3.15.3.1.5 Additional safety professionals, if required, shall meet the following criteria: OSHA 30 hour Certification.

3.15.3.2 Implement a consistent refining-wide TAR walk-through audit program for each shift that involves TAR Coordinators, Operations personnel, Refinery Management (Ops, Maintenance, ES&S), and Contractor Leadership & Safety. Frequency of these audits would depend on the number of contractor safety professionals and the complexity of the TAR.

3.15.3.3 The TAR Safety Team would establish a regular meeting schedule between the MPC Safety Department and contractor safety professionals to review safety statistics, BBS observation trends, safety focus items, and other obstacles that they may be facing with their crews and/or work area. Frequency of these meetings would depend on the number of contractor safety professionals and the complexity of the TAR.

3.15.3.4 Dependent upon the complexity of the TAR, the DLT and TAR group shall consider the use of a Behaviour Science Technology (BST) consultant that would be located on-site to observe and coach the TAR organization, with regards to safety messages and oversight.

3.15.4 General TAR Safety

3.15.4.1 Safety programs, procedures, MIOSHA record keeping forms, and documentation regarding safety shall be maintained on-site.

3.15.4.2 Each Contractor must submit a site specific safety plan detailing how they will adequately protect the contract employees from hazards for a specific job from start to finish. Job Specific Safety Plans must be submitted via a hard copy or an electronic copy to the Contractor's MPC Coordinator and the MRD Safety Group. Refer to RSW-SAF-060-Form-05-DT, [Projects and TAR Site Specific Safety Plan Template](#). All of these requirements are subject to audit.

3.15.4.3 If work includes any tasks that have the potential of respirable crystalline silica exposure a written exposure control plan must be submitted. Refer to [RSW-SAF-090-DT Silica Handling Plan](#) for more details.

3.15.4.4 Routing Weld Leads, Electrical Cords, and Steam Hoses

3.15.4.4.1 Use ramps as a conduit for weld leads, electrical cords, and hose crossings in roadways and aisle ways.

3.15.4.4.2 Use cable trays or any other safe method of running hose, electrical cords, and leads at a minimum of 7 feet overhead to eliminate a large portion of tripping hazards.

Note: These materials should not be located in walkways.

3.15.4.4.3 If hoses are equipped with fittings that require some sort of locking mechanism, such as Chicago fittings, then each connection must be locked using wire or pins where designed on the fittings.

3.15.4.4.4 Development of a plot plan containing routing information as well as locations should be considered for Major TAR work.

3.15.4.5 Fire Watch/Confined Space Attendant Accountability

3.15.4.5.1 All fire watch/confined space attendants must log in using the Complex Visitor Log Book in accordance with RSW-SAF-068-DT [Process Unit Sign In & Sign Out](#) with their company name and "TAR" after their name.

3.15.4.5.2 The Foreman verifies that all fire watch/confined space attendants have signed in and signed out using the log book.

4.0 DEFINITIONS

4.1 *Detroit Safety Orientation (DSO)* – An overview of safety critical programs at the Detroit Refinery, intended for personnel working in process units or under a safe work permit. See RSW-SAF-023-DT [Safety Orientation Procedure](#) for more information.

4.2 *Basic Safety Orientation (BSO)* – A 15-minute video offering highlights of the DSO. This orientation is for all contract personnel who will NOT work under a Safe Work Permit.

4.3 *Contract* – A legal document which has a specific term setting forth the terms and conditions of the Contractor relationship between MPC and/or its affiliates and Contractor's legal entity. This is often termed a service contract and is designed to be used by any MPC organization multiple times. The service contract commonly excludes specific scopes of work and or prices. Work is released using a Job Order mechanism.

4.4 *Contract Initiator* - A MPC employee who brought in the Contractor, technician, or specialty Contractor to perform work.

4.5 *Contractor* - Any non-MPC entity providing labor, and/or services relating to the construction, maintenance or operations on MPC owned, leased and/or controlled property (third-party owned and MPC controlled work) and includes without limitation, prime contractors as well as subcontractors. The term excludes Consultants, Couriers, Marine Chemist, members of the public, Motor Carriers, public emergency services, public utilities, Sales Representatives, Tankerman, third-party right-of-way owners, Vendors, and Visitors. Utilize the Contractor Decision Flowchart ([Appendix E](#) of SAF4004DN-Contractor Safety Management Standard) to assist in decisions (Motor Carriers & Tankerman have separate vetting processes).

NOTE: Non-MPC entities that meet the generally-accepted definition of Consultant, Sales Representative and/or Vendor, but perform, Safety Sensitive Services as defined in this

Standard, shall be defined as Contractors, and shall be subject to this Standard, Where such Consultants, Sales Representatives and/or Vendors defined as Contractors do not meet the Common Evaluation Criteria, a Temporary Approval per section 3.0 of this Standard is appropriate to allow specific risk mitigation tools to be implemented for the specific hazards that the Contractor may encounter.

- 4.5.1 Nested Contractor - Pertaining to the presence of a Contractor working at the Detroit Refinery on a routine/regular basis or a high daily average presence.
- 4.5.2 Non-Nested Contractor – Pertaining to the presence of a Contractor working at the MRD on a non-routine or intermittent basis.
- 4.5.3 PSM Contractor - A Contractor performing work on or adjacent to PSM-covered process areas. A process Contractor's employees may be exposed to the process hazards or can affect process variables.
- 4.6 Commercial Partners – Involved with MPC's operations, products, or services that are not MPC employees.
- 4.7 Contracts Lifecycle Management (CLM) Database - Designed to manage the risks associated with the contracting process by providing tools for the education of employees engaging in each of the four phases of the contracting process (Strategy, Development, Management and Assessment), and provides a database of information about Contractors authorized to provide services to MPC and the associated contracts that govern those services. The CLM Website provides Guidelines, Best Practices, and Tools for each of the four phases of the contracting process and a suite of MPC Model Contracts and guidelines. The CLM Database is designed to allow users to identify Contractors with valid contracts and readily determine whether or not the Contractors have met the safety and insurance requirements that MPC require. The CLM Database also provides a Contractor review process for the assessment of Contractor performance and a repository for lessons learned.
- 4.8 Coordinator – The MPC employee who is assigned as the projects and/or Contractor coordinator/designee.
- 4.9 Structured Safety Program/DRIVE Safety - Utilizes the most widely recognized tools used in our industry (e.g., Start of Shift Meetings, JSAs, Team Safety Inspections, and Sequential Safety Meetings) and uses them to foster a high level of employee involvement and ownership of the safety process. See RSW-SAF-009-DT [DRIVE Safety Manual](#) for more information.
- 4.10 Health, Environmental, Safety, and Security (HES&S) Department – A conglomeration of groups comprised of Safety, PSM, Environmental, and Security to form one department.
- 4.11 HES&S Manager – Responsible for the implementation of the HES&S procedures and administrative controls necessary to maintain a safe work environment and assure compliance with the relevant regulations and company standards.
- 4.12 Job Order – MPC purchase order for service.
- 4.13 Job Safety Analysis (JSA) – A technique that focuses on job tasks as a way to identify and control hazards before they result in an accident. It focuses on the relationship between the worker, the task, the tools, and the work environment.

- 4.14 Joint Job Site Visit (JJSV) - A meeting between an owning department representative and at least one member of the work party working off of the Safe Work Permit at the specific location where the job will be conducted. The meeting discussion will address the work scope and all safety aspects of the permit. The member of the work party that attends the JJSV must convey the information covered in the JJSV to all members of their work party.
- 4.15 Intelex– Electronic database system used by MPC for tracking and documenting various PSM element components such as Management of Change, Audits, Incident Investigations, Process Hazard Analysis, Recommendation Tracking, etc.
- 4.16 Owning Department - The department that owns and operates the process, process-related, and/or utility equipment, machinery, building, and/or systems.
- 4.17 ISN Safety Management, Inc. (ISN) - Contracted agent of MPC that reviews and evaluates Contractor health and safety programs and supporting documents. Based on the review and evaluation, ISN provides a numerical score of the Contractor's safety programs that is used by MPC during the pre-qualification process and monitors the Contractor's annual safety statistics.
- 4.18 Process Contractor - A Contractor performing work on or adjacent to PSM-covered process areas. A process Contractor's employees may be exposed to the process hazards or can affect process variables.
- 4.19 Process Safety Management (PSM) – Refer to MIOSHA General Industry Safety Standard, Part 91, and MIOSHA General Industry Health Standard, Part 591.
- 4.20 PSM Coordinator – Responsible for providing direction, support, and guidance on the Commercial Partner Program, ensuring that the overall PSM and Responsible Care® (RC) program requirements are appropriately implemented at the site.
- 4.21 Safety Sensitive Services - Work performed at Facilities owned, leased, operated, or controlled by MPC that may affect personal & process safety including but not limited to:
- Work performed on process equipment or within a process boundary;
 - Work that involves Life Critical Activities or other hazardous activities as defined by the Organization without prior approved pre-defined risk mitigations (T&L Only – See Appendix G – T&L Contractor Safety Pre-Qualification Process);

NOTE:

- Utilize the Safety Sensitive Decision Flowchart ([Appendix F](#) of SAF-4004DN Contractor Safety Management Standard) or consult the appropriate Global Procurement / HES&S Representative to assist in decisions.
 - ***Work performed by third-party contractor services on facilities or equipment owned by business partners of MPC but located on MPC owned or controlled property is excluded from this Standard (e.g., electrical substation, specialty gas plant, pipeline station).***
- 4.22 Sequential Safety Meetings – Safety meetings conducted as a part of DRIVE Safety to ensure management of DRIVE Safety at all levels, achieve involvement of all personnel, provide an avenue for two-way communication of safety issues and concerns, analyze

process data and plan future prevention activities, and increase safety awareness, hazard recognition, and personnel accountability.

- 4.22.1 MPC Directed Sequential Safety Meetings - Monthly meeting between MPC Safety and Contractor supervision (representatives from each Contractor).
- 4.22.2 Contractor Directed Sequential Safety Meetings - Monthly meeting between Contractor Supervision and Contract Employees (including Subcontractors).
- 4.23 Supervisor — An employee who represents the Detroit Refinery, managing construction, Turnaround, or maintenance activities at the refinery.
- 4.24 Supplier/Vendor – An individual or company whose activities would not be expected to reasonably contribute to or result in a significant health, environmental, safety, and security risk (or aspect) and who may or may not be escorted within MRD while performing this service.
- 4.25 Work Order (WO) - MPC Work Order typically related to maintenance or construction activities.
- 4.26 Work Party - Includes all personnel whose tasks are covered by the work permit.

5.0 REFERENCES

Citation	Title
PSM-1070	Process Safety Management
SAF-4004-DN	Contractor Safety Standard
RDP-M034-MI-DT	Facility Siting – Proceduralized MOC for Trailers/Shelters
RSP-1306	PSM/RMP Contractors
RC 14001:2008	
REW-WG-001-DT	Waste Handling and Disposal
RSW-SAF-006-DT	Safe Work Permits
RSW-SAF-009-DT	DRIVE Safety Manual
RSW-SAF-012-DT	Hazard Communication Program
RSW-SAF-018-DT	Safety Procedure Variance and Exception Guidelines
RSW-SAF-023-DT	Safety Orientation Procedure
RSW-SAF-090-DT	Silica Handling Plan
Part 91 and Part 491	MIOSHA General Industry Health and Safety Standards: Process Safety Management of Highly Hazardous Chemicals, (h) Contractors
Part 11	MIOSHA Administrative Rules for all Industries: Recordkeeping and Reporting of Occupational injuries and Illnesses

6.0 ATTACHMENTS

- A. [Contractor Temporary Approval Form](#), SAF4004DNAppD
- B. [Safety Program Restriction\(s\) Request Form](#), SAF4004DNAppC
- C. [Common Evaluation Criteria](#), SAF4004DNAppB
- D. [Contractor Decision Flowchart](#), SAF4004DNAppE
- E. [Safety Sensitive Decision Flowchart](#), SAF4004AppF
- F. [Disciplinary Action Form](#), RSW-SAF-060-Form-06-DT
- G. [Temporary Approval Site Specific Safety Plan Template](#),
RSW-SAF-060-Form-02-DT
- H. [Training Matrix Template](#), RSW-SAF-060-Form-03-DT
- I. [Field Verification Checklist](#), RSW-SAF-060-Form-01-DT
- J. [Projects and TAR Site Specific Safety Plan Template](#),
RSW-SAF-060-Form-05-DT

Revision number	Description of change	Written by	Checked by	Effective date
23	Added Silica Handling information in sections 3.13.2, 3.15.4.3, and as a reference.	A. Styes	J. Rabideau	10/18/17
24	Added language to clarify requirements for Contractor Training Logs and Matrixes. New language details exactly what is required in each document.	A. Hetu	J Rabideau	02/21/18
25	Replaced PEC Premier with ISN. Updated ASO to DSO. CMP database no longer exists, replaced with CLM. Links in 3.2.5.3-4 need to be updated.	N. Williams	J. Rabideau	11/14/18
26	Update definition from “KMS” to “Intelex”	A. Hetu	J. Rabideau	3/12/19
27	Updated broken links	B. Dibert	Al Morales	9/24/19