

Authored By: GBR Contractor PSM Element Team	<b>Blanchard Refining Company LLC Galveston Bay Refinery</b>	Doc No.: RGD-PS-000020-GB Rev No: 0
Doc Custodian: GBR Supply Chain Manager		<b>PSM Contractor Site Plan</b>
Approved By: Signature Page		
Date Approved: 12/30/2019	Next Review Date: 12/30/2024	Effective Date: 12/30/2019

## Contractors

Scope	Describe the GBR PSM Contractor Site Plan and the Contractor Process Safety Management (PSM) Requirements at the Marathon Petroleum Company LP (MPC) dba Blanchard Refining Company LLC (BRC) Galveston Bay Refinery (GBR).
Purpose	The PSM Contractor Site Plan establishes a process for the prequalification of contractors performing safety-sensitive services on behalf of Marathon Petroleum Company LP (MPC) dba Blanchard Refining Company LLC (BRC), Galveston Bay Refinery (GBR). The process defines the contractors and services governed by the Site Plan; measurable criteria contractors are required to meet before work is awarded; a management system for maintenance of contractor safety information and status; guidelines for use of a third-party vetting firm; and a temporary exception process for required contractors that fail to meet the prequalification criteria.
Applicability	OSHA Process Safety Management of Highly Hazardous Chemicals Standard found at 29 CFR 1910.119 applies to companies that handle any of more than 130 specific toxins and reactive chemicals in quantities equal to or greater than those listed in Appendix A of the standard; it also includes flammable liquids and gases in quantities of 10,000 pounds or more in a covered process. GBR is considered a PSM Facility. This PSM Contractor Site Plan applies to all contractor personnel performing work for BRC at BRC owned, leased or controlled locations or within BRC owned equipment (excluding work performed on BRC equipment at non-BRC owned or non-controlled locations).
Records Retention	Printed copies of this document should not be retained more than 12 months. Any revision to this document will be retained indefinitely.
Supersedes	This document supersedes GBR-HESS-PS 6.0,Rev.1.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

## Contents

1.0	References .....	4
1.1	Refining References .....	4
1.2	Acronyms .....	4
1.3	Definitions .....	4
2.0	Roles and Responsibilities See Appendix A – Roles & Responsibility Process Map .....	8
2.1	Contractors – Application .....	8
2.2	Employer Responsibilities .....	8
3.0	Covered Contractors .....	10
3.1	PSM / RMP Regulation .....	10
3.2	Written Plan Required .....	11
3.3	Service Contract .....	11
3.4	Related Documents .....	12
4.0	Employer Responsibilities .....	13
4.1	PSM / RMP Regulation .....	13
4.2	Contractor Selection - General Requirements .....	13
4.3	Contractor Written Program Exemption Review Requirements .....	14
4.4	Temporary Approval Process – Contractor Selection .....	15
4.5	Pre-Work Activity - Management of Contractors On-Site / Contractor Risk Mitigation Tools.....	17
4.6	Temporary Approval Process Pre-Work Activity .....	21
4.7	Control of Unit Entry and Exit.....	22
4.8	Injury Log .....	22
4.9	Contractor Audits .....	22
5.0	Contract Employer Responsibilities .....	26
5.1	PSM/RMP Regulation .....	26
5.2	Contractor Responsibilities .....	26
5.3	BRC Responsibility .....	27
6.0	Training .....	27
6.1	Training Requirements.....	27

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

6.2 Contractor Training Table ..... 29

Appendix A: Contractor Field Verification Audit Checklist ..... 30

Approvals: ..... 31

Revision History ..... 31

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

## 1.0 References

### 1.1 Refining References

The table below lists the Refining references used within this document.

Number	Description
<a href="#">PSM-1070</a>	Corporate HES&S Standards – Process Safety Management
<a href="#">SAF 4004</a>	Contractor Safety Management Standard
<a href="#">RSP-1306</a>	Refining Standard Practice - PSM/RMP Contractors

### 1.2 Acronyms

The following acronyms are used within this document:

- BRC** – Blanchard Refining Company
- DCCHT** – DISA Contractor Consortium Hair Testing Program
- EMR** – Worker’s Compensation – Experience Modification Rate
- GBR** – Blanchard Refining Company – Galveston Bay Refinery
- HAZCOM** – Hazard Communication
- HF Acid** - Hydrofluoric Acid
- MOC** – Management of Change
- MPC** – Marathon Petroleum Company LP
- OMCC** – Oil Movements Control Center
- PHA** – Process Hazard Analysis
- PPE** – Personal Protective Equipment
- PSM** – Process Safety Management
- RMP** – Risk Management Plan
- RSP** – Refining Standard Practice
- SCTC** – Safety Council of Texas City
- TWIC** – Transportation Worker Identification Credential

### 1.3 Definitions

**Component:** Operating entities within Organizations (e.g. Robinson Refinery – a Component of Refining; Terminals – a Component of MPLX Logistics & Storage; Javelina Processing Facility – a Component of MPLX Gathering & Processing; Marathon Pipe Line - a Component of MPLX Logistics & Storage

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

**Common Evaluation Criteria (CEC):** Safety performance criteria used to determine if Contractors qualify to perform services at BRC, as outlined in SAF-4004, Appendix B – Common Evaluation Criteria.

**Consultant:** A non-BRC professional who provides professional or expert advice in a particular area such as engineering, safety, training, management or any other specialized fields. Once a Consultant performs Safety Sensitive work, as defined by this Site Plan, they will be considered a Contractor and required to comply with this Site Plan.

**Contractor:** Any non-BRC entity providing labor, and/or services relating to the construction, maintenance or operations on BRC owned, leased and/or controlled property (third-party owned and BRC 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 (including Water, Electric, Gas, Phone, Internet, Cable), Sales Representatives, Tankermen, third-party right-of-way owners, Vendors, and Visitors. Utilize the Contractor Decision Flowchart (Appendix E – Contractor Decision Flowchart) to assist in decisions (Motor Carriers & Tankerman have separate vetting processes).

**NOTE:** Non-BRC entities that meet the generally-accepted definition of Consultant, Sales Representative and/or Vendor, but perform, Safety Sensitive Services as defined in this Site Plan shall be defined as Contractors, and shall be subject to this Site Practice, Where such Consultants, Sales Representatives and/or Vendors defined as Contractors do not meet the Common Evaluation Criteria, a Temporary Approval per section 4.4 of this Site Plan is appropriate to allow specific risk mitigation tools to be implemented for the specific hazards that the Contractor may encounter.

**Contractor Risk Mitigation Tools:** These are controls that when incorporated will facilitate a higher level of Contractor performance and compliance with regulations and Standards.

**Contractor Safety Management Team:** A cross functional team of MPC employees consisting of representatives from Corporate Safety, Refining - Safety, L&S - Safety, G&P, Administrative Services HES, Supply Chain and the MPC Law Organization.

**Covered Process:** “Process” means any activity involving a hazardous chemical including using, storing, manufacturing, handling, or moving such chemicals at the site, or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected and separate vessels located in a way that could involve a highly hazardous chemical in a potential release are considered a single process.

**Facility:** A BRC owned, leased, operated or controlled place where work is performed (e.g., Refinery, Terminal, Pipeline, Dock). Facility shall include Process Safety Management (PSM) covered facilities, as well as non-PSM covered facilities, unless otherwise specified in this Site Plan.

**Life Critical Activities:** Activities, as defined by the Organization, that have a significant potential for serious injury, illness or death resulting from failure to comply.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

**Organization:** Organizational groups (e.g., Refining, Logistics & Storage (L&S), Marketing, Gathering & Processing (G&P).

**BRC Representative:** Any employee (BRC or Contractor) with primary responsibility for overseeing the completion of work being conducted by a Contractor and/or interfacing with Contractor supervision or Contractor employees (e.g., Project Lead, Ops Tech, Operator, BRC Supervisor, Directly Supervised Contractor (DSC) working on behalf of BRC, BRC Safety Rep).

**Safety Sensitive Services:** Work performed at Facilities owned, leased, operated, or controlled by BRC, 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.

**NOTE:** Utilize the Safety Sensitive Decision Flowchart (Appendix F – Safety Sensitive Decision Flowchart) or consult the appropriate Supply Chain / HES&S Representative to assist in decisions.

- Work performed by third-party contractor services on facilities or equipment owned by business partners of BRC but located on BRC owned or controlled property is excluded from this Standard (e.g., electrical substation, specialty gas plant, pipeline station, communication equipment).

**Safety Status Met:** Designation assigned to a Contractor who meets or exceeds all of the requirements of the Common Evaluation Criteria.

**Safety Status Met-With Restrictions:** Designation assigned to a contractor who meets or exceeds the requirements of the Common Evaluation Criteria and is subject to Work Restrictions due to waiver of one or more Safety Programs.

**Safety Status Not Met:** Designation assigned to a Contractor who does not meet all of the requirements of the Common Evaluation Criteria.

**Supplier:** A person or entity that is the source for goods or services. A supplier could provide goods or services to BRC or to a Vendor. Once a Supplier performs Safety Sensitive Services, as defined by this Standard, they will be considered a Contractor and required to comply with this Site Plan.

**Temporary Approval (TA):** A set of criteria outlined in Section 4.4 that provide for the limited use of Contractors that do not meet the Common Evaluation Criteria. The criteria must be indicated on Contractor Temporary Approval Form as one of the following:

**Emergency Response:** A Temporary Approval granted to a Contractor named as a responder on one or more government-mandated list(s) of emergency-response Contractors (e.g., Oil Spill Response Organization or “OSRO”). This TA applies only to emergency response services during an active response. This Contractor cannot perform other services (e.g., environmental services, vacuum truck services outside of

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

an active response). All OSRO's listed on government-mandated lists are required to be approved by MPC's third-party contractor vetting firm or under a TA. If an active emergency response requires the use of a Contractor who is not approved by MPC's third party vetting firm or under a TA, they are allowed to be used until the emergency response is over. After the emergency response is over the Contractor will start the approval process through the third-party contractor vetting firm or a TA will be started for their use in the future.

**No History:** A Temporary Approval granted to a Contractor because the criteria is not available, because the Contractor is not in MPC's third-party contractor vetting firm or is in progress of submitting the Contractor Evaluation Criteria. New Contractor companies that do not have three years of data will be evaluated on the data that is available. See [Appendix B – Common Evaluation Criteria](#) for additional details on possible "Overrides".

**Project Specific:** A Temporary Approval granted for a Contractor to perform a predetermined project specifically identified in the Temporary Approval form (e.g., installation of an electrical unit). Work outside the scope of the specified project requires a separate Temporary Approval.

**Contractor Specific:** A Temporary Approval granted for a specific Contractor to perform work specified in the Temporary Approval form (e.g., welding, security services, and scaffolding).

**Vendor:** Is used to describe the person or entity that is paid for the goods provided, rather than the manufacturer of the goods. A Vendor would provide their goods to BRC or a Contractor. Once a Vendor performs Safety Sensitive Services, as defined by this Standard, they will be considered a Contractor and required to comply with this Standard.

**Work:** Any physical task performed with tools or equipment by a contractor. (Excluding: Consulting, data collecting, startup observations, etc.)

**Work Restriction:** A restriction that prohibits a Contractor from performing work activities (i.e., confined space entry, elevated work, lifting with a crane) that require specific safety program(s) (i.e., confined space entry program, fall protection program, lifting program). This is subject to an approved Contractor Safety Program Restriction Request Form. ([Appendix C – Written Program Exemption Review Form](#) or approved Work Flow process.)

**Written Program Exemption Review:** A review of a Contractor exemption request for a written program typically required MPC's third party vetting firm. This review is completed by the Contractor Safety team and applies across MPC.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

## 2.0 Roles and Responsibilities See [Appendix A – Roles & Responsibility Process Map](#)

### 2.1 Contractors – Application

The following roles and responsibilities apply to the Application section of Contractor Compliance:

#### GBR Supply Chain Manager or Designee

- Develops and implements a written PSM program for Contractors and Subcontractors:
  - Operating a covered process, and
  - Performing maintenance or repair, turnaround, major renovation, installation, or specialty work on a covered process, and
  - Working adjacent to covered processes.
- Ensures that the written program covers Contractors and Subcontractors who
  - could affect the containment of Highly Hazardous Chemicals or regulated materials within the Covered Process, and
  - could be affected by loss of containment of a Highly Hazardous Chemical or Regulated Substance.
- Ensures that Contractors working on or adjacent to a Covered Process are governed by the appropriate Service Contract, either through a direct commercial relationship with BRC, or as a Subcontractor to a Contractor with such a direct commercial relationship.

### 2.2 Employer Responsibilities

The following roles and responsibilities have been defined for the PSM/RMP Contractors PSM element.

#### GBR Supply Chain Manager or Designee

- Develops and implements a written PSM program for Contractors and Subcontractors.
- Ensures that Contractors and Subcontractors working on or adjacent to a Covered Process are governed by the appropriate Marathon Contract, either through a direct commercial relationship with BRC, or as a Subcontractor to a Contractor with such a direct commercial relationship.
- Review Contractor and Subcontractor Safety Pre-Qualification information prior to awarding work.
- Utilize the applicable, established BRC Contractor Safety Pre-Qualification Process to evaluate safety performance and programs of Contractors and Subcontractors that perform work on or adjacent to a Covered Process prior to the work commencing.
- Implements the defined temporary approval process that provides for limited use of Contractors and Subcontractors that do not meet the screening criteria, and where an equally qualified contractor that meets the screening criteria; is capable



Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

of performing the work; and is prequalified, is not available.

- Prior to commencement of work, provides Contractors and Subcontractors with
  - the applicable GBR site-specific safety rules applicable to the scope of work to be performed,
  - the applicable provisions of the GBR emergency action plan, and
  - any overview of process hazards related to the Contractor’s work and the Covered Process.
- Performs a Safety Audit of a representative number of Contractors and Subcontractors performing work on or adjacent to Covered Processes as defined in RSP-1306.

**Note:** The results of the periodic evaluation Safety Audit must be reviewed with the Contractor/Subcontractor and follow-up performed to ensure that actions to address deficiencies are completed.

### **GBR Safety Supervisor or Designee**

- Assists the GBR Supply Chain Manager to utilize the applicable, established BRC Contractor Safety Pre-Qualification process to evaluate safety performance and programs of Contractors and Subcontractors that perform work on or adjacent to a Covered Process prior to the work commencing.
- Assists the GBR Supply Chain Manager in reviewing Contractor and Subcontractor Safety Pre-Qualification information prior to awarding work.
- Assists Requesting Contractor and/or Subcontractor Coordinator in identification of risk mitigation requirements for temporary approvals.
- Utilize the applicable, established Marathon process to evaluate safety performance and programs of Contractors and Subcontractors that perform work on or adjacent to a covered process prior to the work commencing.
- Establish a system or procedure to control the entrance, presence and exit of all non-operating personnel including Contractor and Subcontractor employees, visitors, and Marathon support personnel (e.g. Maintenance, Safety, Environmental, Laboratory, etc.).
- Establishes and maintains a log of Contractor and Subcontractor Injury and Illnesses related to their work in Covered Process areas.

**Note:** The Contractor and/or Subcontractor will be responsible for providing the information necessary to populate this log.

- Periodically audits Contractors and Subcontractors to determine their understanding of:
  - the applicable Organizational or site-specific safety rules applicable to the scope of work to be performed,
  - the applicable provisions of the emergency action plan, and
  - any general process hazards related to the contractors work prior to commencing work.
- Performs a Safety Audit of a representative number of Contractors and Subcontractors performing work on or adjacent to covered processes as defined in RSP-1306.

**Note:** The results of the periodic evaluation must be reviewed with the

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

Contractor/Subcontractor.

### **Permit Issuer (typically Site Operations personnel)**

- During the joint jobsite visit and during the permitting process, informs the Contractor or Subcontractor employees of the known potential fire, explosion, toxic release, or unique and process hazards related to the Contractor’s work and the Process Area where the work is being permitted.
- Informs the Contractors or Subcontractors of any unique emergency action plan provisions of the Process Area where the work is being permitted.

### **GBR Contractor or Subcontractor Coordinator and Site Manager Requesting Contractor or Subcontractor**

- Identifies any Contractor training requirements outside of those identified in the Employer or Contractor sections of this document and communicates training requirements to Contractor for completion of this training.
- Ensures identification of risk mitigation requirements for temporary approvals, and implementation in the field.
- Manages assigned contractors in accordance with the Contractor Coordinator “Roles & Responsibilities” as published by GBR’s Maintenance Department.

## **3.0 Covered Contractors**

### **3.1 PSM / RMP Regulation**

Contractors (h) [68.87]

(1)[a] Application. This paragraph [section] applies to contractors performing maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. It does not apply to contractors providing incidental services which do not influence process safety, such as janitorial work, food and drink services, laundry, delivery or other supply services.

PSM Compliance Audits 29 CFR 1910.119(o)

[RMP Compliance Audits 40 CFR 68.79]

(1)[a] Employers [The owner or operator] shall certify that they have evaluated compliance with the provisions of this section at least every three years to verify that the procedures and practices developed under this standard are adequate and are being followed.

(2)[b] The compliance audit shall be conducted by at least one person knowledgeable in the process.

(3)[c] A report of the findings of the audit shall be developed.

(4)[d] The employer [owner or operator] shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

(5)[e] Employers [The owner or operator] shall retain the two (2) most recent compliance audit reports.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

### 3.2 Written Plan Required

This program serves as the written plan that meets the regulatory requirements for Contractors that are:

- operating a Covered Process,
- performing
  - maintenance or repair,
  - turnaround,
  - major renovation,
  - installation, or
  - specialty work on a Covered Process; and
  - working adjacent to Covered Processes.

This Contractor Site Plan includes applicable components of the Contractor Safety Standard (SAF-4004).

### 3.3 Service Contract

GBR ensures the Contractors working on or adjacent to a Covered Process are governed by the appropriate Service Contract, either through a direct commercial relationship with BRC, or as a subcontractor to a Contractor with such direct commercial relationship.

- BRC uses a suite of risk-based Model Form Contracts for procurement of onsite services. When onboarding new Contractors that have not historically provided services to BRC, Supply Chain shall determine the appropriate Model Form Contract based on the services the Contractor is eligible to perform.
- Contractors executing the following BRC Model Form Contracts, or an approved Non-Standard Contract of comparable terms and conditions, shall be required to complete the requirements of an evaluation conducted by the authorized third-party contractor vetting firm, regardless of services the Contractor will initially provide to BRC:
  - Major Services Contract;
  - Emergency Response Services Contract;
  - Environmental Services Contract;
  - Engineering, Procurement, Construction and Construction Management Contract; or
  - Master Environmental Services Contract.
- Contractors executing the following BRC Model Form Contracts, or without a governing contract (i.e., services performed by traditional vendors or consultants,) shall be required to complete the requirements of an evaluation conducted by the authorized third-party contractor auditing firm if the services they perform meet the definition of Safety Sensitive Services:
  - Engineering and Procurement Contract;
  - Engineering, Drafting & Consulting Contract; Standard Service Contract;
  - Basic Service Contract; or

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- Engineering, Procurement & Construction (Project Specific).

### 3.4 Related Documents

The table below provides a list of documents that provide additional information regarding Contractor safety, certain of which are expressly referenced in subsequent sections of this Refining PSM Standard.

Document No.	Title	Document Custodian	Purpose
<a href="#">SAF 4004</a>	Contractor Safety Management Standard	Corporate Health, Environment, Safety & Security	To promote a safe working environment for Contractors and Subcontractors and MPC employees and to improve Contractor safety performance
<a href="#">PSM-1070</a>	Process Safety Management	Corporate HES&S	Defines MPC's minimum requirement to comply with OSHA's Process Safety Management requirements.
<a href="#">RSP-1306</a>	Refining Standard Practice - PSM/RMP Contractors	Refining HES&S	Defines the Site Contractor PSM requirements.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

## 4.0 Employer Responsibilities

### 4.1 PSM / RMP Regulation

Employer [Owner or Operator] Responsibilities (2)[b]

(i)[1] The employer [owner or operator], when selecting a contractor, shall obtain and evaluate information regarding the contract employer's [contract owner or operator] safety performance and programs.

(ii)[2] The employer [owner or operator] shall inform contract employers [contract owner or operator] of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process.

(iii)[3] The employer [owner or operator] shall explain to contract employers [the contract owner or operator] the applicable provisions of the emergency action plan required by paragraph (n) of this section [subpart E of this part].

(iv)[4] The employer [owner or operator] shall develop and implement safe work practices consistent with paragraph (f)(4) this section [§68.69(d) of this part], to control the entrance, presence, and exit of contract employers [contract owner or operator] and [contractor] employees in covered process areas.

(v)[5] The employer [owner or operator] shall periodically evaluate the performance of contractor employers [the contract owner or operator] in fulfilling their obligations as specified in paragraph (h)(3)(c) of this section.

(vi)[6] The employer shall maintain a contract employee injury and illness log related to the contractor's work in process areas. [This requirement is omitted from §68.87(b)]

### 4.2 Contractor Selection - General Requirements

- In order to perform Safety Sensitive Services on-site at BRC owned, leased, operated or controlled locations, Contractors shall successfully complete the requirements of:
  - An evaluation conducted by the authorized third-party contractor vetting firm,
  - or
  - an alternative evaluation process can be used if an Exemption to this portion of the Site Practice has been approved per GEN-1001.
- BRC will employ Common Evaluation Criteria to assist in evaluating Contractors (see [Appendix B: Common Evaluation Criteria](#)). Contractors shall only be hired for services they have been pre-qualified to perform.
- If a contractor utilizes temporary workers, the temporary staffing agency is not required to be approved by the third-party vetting firm.
- BRC will consider results of the Deep Dive Audits, Incidents, Contractor Scorecard, Behavior Based Safety Participation/Scantron Audits and any other available information when choosing a Contractor.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- The Contractor Safety Management Team is responsible to review the Common Evaluation Criteria and recommend changes as needed.
- If changes are recommended to the Common Evaluation Criteria the Contractor Safety Management Team will review the recommendations. Appropriate recommendations will be submitted for approval and published upon approval.
- The Contractor Safety Management Team in Findlay, Ohio may perform a separate evaluation of Contractors facing severe legal, criminal or other unethical allegations/penalties.
- MPC Supply Chain Organization in Findlay, Ohio is responsible for administering a common database of Contractor information (Contractor Database) about contracts, Contractors with the Safety Status Met designation and the work for which they are approved.
  - Supply Chain in Findlay, Ohio shall update the Contractor Database as needed with approved Written Program Exemption Review Form information.
  - Supply Chain in Findlay, Ohio shall update the Contractor Database as needed with Temporary Approval information.
- Contractors that meet all requirements of the Common Evaluation Criteria shall be identified as Safety Status Met or Safety Status Met with Restrictions in the Contractor Database.

### **4.3 Contractor Written Program Exemption Review Requirements**

- A Contractor may submit a Written Program Exemption Review through MPC's third party vetting firm to the Contractor Safety Management Team for waiver of individual safety programs in cases where the Contractor will never perform services that require those safety programs for any MPC Organization. These waivers, if approved by the Contractor Safety Team, will be granted globally across all MPC Organizations.
- All completed Written Program Exemption Reviews shall be forwarded from the Contractor Safety Management Team for review and final approval or rejection.
- The Contractor Safety Management Team will recommend approval of the Written Program Exemption Review Form to Corporate Safety only if the specific Safety Program(s) required by the Work Type Matrix will not be utilized by the Contractor at any time they perform services for any MPC Organization, including BRC.
  - The Contractor Safety Management Team will meet monthly to discuss Contractor Written Program Exemption Reviews received.
- Waiver of individual safety program(s) will not be granted for project specific tasks. A project specific TA could be utilized instead, since a waiver removes the requirement for that Contractor across all MPC Components including BRC from that point forward.
- Contractors that meet all remaining requirements of the Common Evaluation Criteria and have an approved Safety Program Restriction(s) Request Form will be identified as Safety Status Met-With Restrictions in the Contractor Database.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- Contractors identified as Safety Status Met-With Restrictions may perform the services indicated with the exception of activities related to the safety program(s) waived.
- Any safety program(s) that have been waived will be indicated as Restrictions (Individual Safety Programs Waived) in MPC's third party vetting firm's system along with the completed review form to document justification.
- If BRC is utilizing a Contractor and the Contractor is identified as Safety Status Met-With Restrictions, BRC shall refer to the Safety Programs Waived section in the Contractor Database and ensure work being completed will not require the program that was waived (i.e., the restriction).

#### **4.4 Temporary Approval Process – Contractor Selection.**

- Contractors are to meet the common evaluation criteria prior to working at the BRC facility.
- If BRC determines it is necessary to use a Contractor that does not meet the Common Evaluation Criteria for any reason, then the Contractor Temporary Approval process must be utilized.
- If it is not clear to BRC if a Temporary Approval is required, the Contractor Safety Management Team in Findlay, Ohio shall be consulted.
- The Contractor Safety Management Team in Findlay Ohio will evaluate if the Contractor meets the CEC's and provide a final determination. If the Contractor Safety Management Team in Findlay, Ohio is reviewing whether a fatality is, applicable and related to the type of service requested by MPC, they shall utilize [Appendix H – Fatality Review Questions](#).
- The Component (BRC) or Organization shall complete the Contractor Temporary Approval Form ([Appendix D – Contractor Temporary Approval Form](#)) or related electronic workflow process. This requires written or electronic approval of the Component's Requesting Department Manager, Component and/or Organizational HES&S Manager (depending on Organizational or Component specific) and the Component General Manager and/or Organizational Manager of the requesting organization. The Organization shall start and approve the Temporary Approval if it is a refining wide Temporary Approval. An Organization wide Temporary Approval needs to be approved by the Component for acknowledgement. The Component shall approve the Temporary Approval when being used at their location/project.
  - The Component (BRC) or Organizational Manager has the authority to delegate (continuous delegation, not just when out of the office) Contractor Temporary Approval authority to one or more Direct Report Managers within the Component (BRC) or Organizational structure other than the HES&S Manager as that person is already required to sign all Contractor Temporary Approval Forms.
    - Delegation of authority must be in writing to a named Direct Report Manager. The written authorization shall be retained by the named

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

individual.

- If either the approving Managers change, new written approval shall be made as necessary.
- A completed Contractor Temporary Approval Form or electronic process shall include the following information:
- A thorough explanation of the Contractor's scope of work and/or work types allowed.
- The reasons for requesting a Temporary Approval.
- Details about the risk mitigation measures the Component will perform/require to ensure adequate safety.
  - It is the Component's (BRC's) responsibility to ensure the risk-mitigation measures are sufficient and complied with once the Contractor is on-site to perform services. These would be in addition to the requirements of section 4.1 of this Site Plan.
  - GBR's Supply Chain Group will obtain signatures from a corporate representative and a local representative on the Temporary Approval form acknowledging they understand the risk mitigation measures and how to complete those measures.
- Multiple Components and/or Organizations may combine Contractor Temporary Approvals for the same Contractor on one form provided each respective Component (BRC) and/or Organizational HES&S Manager, and the requesting Manager, signs the form.
- In the event a Contractor is providing services on site (ongoing services) at the time they become non-compliant with the Common Evaluation Criteria, a Temporary Approval shall be implemented within thirty (30) calendar days from the date of notification of the non-compliance if the Component (BRC) or Organization wishes to continue utilizing that Contractor's services for the ongoing services.

**NOTE:** The intent of this thirty-day grace period for ongoing services is to recognize that immediate termination of the Contractor might add significant risk to MPC. A Temporary Approval is required prior to commencement of any new services not ongoing at the time the Contractor becomes non-compliant.

- Temporary Approvals must meet one of the four (4) authorized approval types listed in the Contractor Temporary Approval Form:
  - Project Specific – for a defined scope of work.
  - Contractor Specific – for a specific company performing work.
  - Emergency Response – to authorize use of an emergency responder listing.
  - No History – if the Contractor's safety criteria are not available because the Contractor is not in MPC's third party vetting system or is in progress of submitting the Contractor Evaluation Criteria.
- 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.



Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- If the Common Evaluation Criteria are still not met upon expiration, the Organization must complete a new Temporary Approval to cover the remainder of the three (3) years or twelve (12) quarters for which the TA is required with revised risk mitigation measures (if applicable).

**Table 1 - Temporary Approval Terms**

Criteria Not Met	New Request	1st Renewal	2nd Renewal	Additional Renewals
OSHA Willful Citation, Fatality related to services provided and third party vetting system, Health & Safety Audit Score	6 Months	12 Months	18 Months	18 Months
OSHA Incident Rate and Experience Modification Rate	12 Months	12 Months	12 Months	12 months

A copy of the Contractor Temporary Approval Form shall be sent to the Corporate Safety – Safety Professional and the Supply Chain representative of the requesting component and organization.

#### **4.5 Pre-Work Activity - Management of Contractors On-Site / Contractor Risk Mitigation Tools**

- To facilitate compliance with federal, state, and industry regulations and with MPC standards, Organizations shall, at a minimum, incorporate the following on-site Contractor Risk Mitigation Tools. Required for all Contractors are the following:
  - Ensure Contractors have the Safety Status Met or Safety Status Met with Restrictions designation for work in the Contractor Database.
  - Conduct site orientation training at MPC Operating Facilities (or authorized Safety Councils) which shall include applicable provisions of the emergency action plan.
  - Periodically verify required regulatory training and other safety training of Contractor employees to safely perform services (e.g., crane operator certification, confined space entry attendant, fall protection, etc.). Also, periodically verify Contractor employees are qualified (by training, experience or certification) to perform the services to be provided to MPC (e.g., electrician, welder, HVAC technician).
  - Ensure Contractor employees are briefed on the hazards of the work to be performed and mitigation measures (e.g., participate in a pre-job safety meeting, tail-gate meeting, etc.).
  - Ensure the Contractor is issued a work permit when required.
  - Ensure Contractor job sites are audited by an MPC Representative (frequency determined by Component) for life critical activities.
  - Ensure all Contractors are provided with relevant Process Hazard

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

Overview per PSM-1070. This requirement is only applicable to Process Safety Management (PSM) and RMP facilities.

- Prior to work beginning and being granted facility access;
  - As identified below Contractor and Subcontractor employees must meet specific GBR plant entry requirements.
  - As identified below GBR provides all Contractors, Subcontractors and directly supervised Contractors with applicable PSM information.
  - All Contractor/Subcontractor personnel requiring unescorted access at GBR must undergo a “First Advantage”, “S2 Verify”, or DISA graded background check. Affected personnel must achieve a grade of 00-02 to be eligible to work on GBR property. Those employees having a grade of 03-07 will not be allowed to work. All exceptions to the background check program must be approved by the requesting BRC Department Manager and the BRC ES&S Manager, or their designee. The First Advantage/S2 Verify/DISA Background Check must be in Completed status before the Safety Council of Texas City (SCTC) will allow the Contractor/Subcontractor employee to complete the GBR Site Specific Training Course. The Safety Council of Texas City (SCTC) will facilitate the background check program on GBR’s behalf.
    - Contractor/Subcontractor personnel working on the GBR East/West Plant docks, on GBR Bay Plant Docks, in Oil Movements Control Center (OMCC) in GBR’s Security Operations Center (SOC), GBR East/West Tank Farm, and GBR Bay Plant South Tank Farm are required to have a valid TWIC card.
    - All Contractor/Subcontractor personnel planning to perform work at GBR must successfully complete the ARSC Basic Plus or Basic Refresher class prior to plant entry. These classes must be completed on an annual basis. These classes are provided through the Safety Council of Texas City (SCTC), are class room training and require successful completion (70% minimum) of a 50-question comprehensive exam. Basic Plus & Basic Refresher training provides an overview of:
      - Introduction
      - Process Safety Management (PSM)
      - General Employee Safety
      - Hazard Communication and Chemical Safety (including GHS)
      - Personal Protective Equipment (PPE)
      - Respiratory Protection
      - Hearing Conservation
      - Electrical Safety
      - Lockout/Tagout
      - Fall Protection
      - Scaffolding
      - Excavation, Trenching & Shoring

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- Job Hazard Analysis (JHA) / Job Safety Analysis (JSA)
- Emergency Action Plan
- Fire Prevention
- All Contractor/Subcontractor personnel planning to perform work at GBR must successfully complete the GBR Site Specific training class prior to plant entry. This class must be completed on an annual basis. This class is provided through the Safety Council of Texas City (SCTC). GBR Site Specific Training is computer-based training consisting of 3 modules and each requires successful completion (80% minimum) of a CBT exam. Topics covered include:

- **GBR Site Specific Bundled Course**

- **Contractor Safety Practices and Policies (CBT)**

- GBR Goal
- Entering Refinery
- Entering Process Units
- Plant Emergencies
- Incident/Injury Management
- Safety Audits

- **Life Critical Safety**

- Safe Work Permit
- Energy Isolation
- Hot Work/Fire watch
- Confined Space Entry
- Fall Protection
- Alky 3 HF

- Personal Protective Equipment
- General Policies
- Hazard Communication Program

- **Galveston Bay Refinery Life Critical Safety (CBT)**

- Safe Work Permits
- Job Safety Analysis (JSA)
- Rigging & Lifting
- Energy Isolation & Blinding
- Fall Protection
- Alky PPE
- Hot Work
- Confined Space Entry

- **Security and Environmental (CBT)**

- **Security:**

- Entering Facility
- ID Badge, Personal ID and TWIC

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- Drug & Alcohol Policy
- Weapons
- Unauthorized Photography
- Explosives
- Suspicious Activity
- Emergency Events
- Emergency Notifications and Evacuation
- Site Inspection
- Restricted Areas
- Security Training
- DHS/USCG Site Inspection
- **Environmental:**
  - GBR Environmental Policy
  - Waste Ownership
  - Labeling of Waste Containers
  - Satellite Accumulation Areas
  - Universal Wastes
  - Spent Process Filters
  - Miscellaneous Environmental Issues
  - Painting/Abrasive Blasting
  - Environmental Incident Reporting
- **GBR Expectations Review (Face-to-Face)**
  - The expectations upon entering the Refinery
  - How to properly enter the Process Units
  - How to respond to Plant Emergency/Muster Points
  - How to properly report an injury or near miss
  - Requirement for Working Safely
  - Responsible Care
  - Site Expectations, Pledge and Safety Commitments
- **Galveston Bay Refinery HF Alky 3 (07GBRHF, Contractor Workers take this when needed)**
  - Introduction
  - Hazards & Exposure
  - Safe Work Practices
  - PPE
  - Job Cleanup Work Location
  - Material Standards
  - Leak Detection & Reporting
  - Summary
- Applicable provisions of the emergency action plan are communicated through the Safe Work Permitting process, Joint Jobsite Visits, and the GBR Site Specific Training conducted at the Safety Council of Texas City.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- Known potential fire, explosion, toxic release, or unique hazards related to the Contractor’s work and the Covered Process is communicated through the Safe Work Permitting process, Joint Jobsite Visits, and the GBR Site Specific Training conducted at the Safety Council of Texas City.
- Access to process hazard analyses (PHAs) and all other information developed under the regulations to employees of Contractors and Subcontractors as requested.
- Provide any relevant PSM information with contract employees who are directly involved in other elements of Process Safety Management when the information relates directly to their work responsibilities.
- Pre-job safety meetings are conducted through Joint Jobsite Visits (JJSV’s) with the Contractor(s) to review the safety aspects of the work to be performed in a Covered Process.
- Access to applicable GBR Contractor Safety Rules and related attachments are made available to contractors via [marathonrefinerycontractor.com](http://marathonrefinerycontractor.com) and can be accessed via this link [GBR Contractor Safety](#). (User name is GBR and password is Lonestar)

**Note:** Subcontractors may be informed directly, or through the employing Contractor. GBR Supply Chain must be informed of all subcontractors needing access to the site.

- All Contractor/Subcontractor companies with employees working in GBR must be members of the DISA Contractor Consortium Hair Testing (DCCHT) Program for drug and alcohol testing. Initial pre-access requires hair follicle, urinalysis and breathalyzer testing. All Contractor personnel working in positions must appear in the DISA Database with a “green light” – Active Status. To maintain a “green light” Active Status, all random drug tests must be completed. MPC requires random tests for urinalysis and breathalyzer testing. MPC does NOT require random hair follicle testing.

#### 4.6 Temporary Approval Process Pre-Work Activity

- Contractor and Subcontractor employees must meet all GBR plant access Pre-Work requirements prior to being granted access to the facility. Specifically, access requirements for; First Advantage/S2 Verify Background Check, SCTC Basic Plus Training, SCTC GBR Site Specific Training, DISA Drug Testing.
- All exceptions must have executed temporary waivers as follows:
  - A process to either defer or waive The First Advantage/S2 Verify Background Check is in place and may be accessed through GBR’s Supply Chain Department or GBR’s Security Department. The Background Check Waiver document must be fully executed by the applicable Department Manager and ES&S Manager. Once executed, a copy should be provided to the Supply Chain Department and the original should be provided to the Security Department. Once the executed document is received, Security will notify the (SCTC) Safety Council of

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

Texas City so the contract employee can complete the GBR Site Specific training. SCTC will verify that the background is in ordered status prior to allowing GBR Site Specific Training.

- There is no waiver process in place for Basic Plus or GBR Site Specific Training. In extreme circumstances this training can be provided at GBR in lieu of the SCTC. This can be done either by a GBR HES Professional or allowing contract employees to watch the site visitor video. This change must be prior approved by the ES&S Manager and documented on an approved Temporary Approval Form.
- A process to waive the DISA Drug Testing requirement is in place during Major Turnarounds, Unexpected Outages, or other critical work activities once approved by GBR's ES&S Manager. This may be accessed through GBR's Supply Chain Department. Once executed, a copy should be provided to the Supply Chain Department, Security; and the original should be provided to the ES&S Department.

#### 4.7 Control of Unit Entry and Exit

- GBR has established a system for controlling and documenting entrance, presence and exit of all non-operating personnel, including
  - Contractor and Subcontractor employees,
  - Visitors, and
  - MPC support personnel (e.g., Maintenance, Safety, Environmental, Laboratory, etc.).
  - GBR's Refinery Safety Rule for controlling and documenting entrance, presence and exit of all non-operating personnel may be accessed at Operating Area Sign In and Sign Out

#### 4.8 Injury Log

- GBR has established and maintains a log documenting all injuries and illnesses of Contractor and Subcontractor employees performing work in Covered Process areas.
- Contractors and Subcontractors are responsible for providing the information necessary to populate and update the log.

#### 4.9 Contractor Audits

GBR has established the following Contractor performance assessment requirements, consisting of full program audits and field verification audits, as more completely described herein.

- **Full Program Audits:**
  - GBR will periodically perform (at least annually) an evaluation ("Full

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- Program Audit”) of a representative number of Contractors and Subcontractors performing work on or adjacent to Covered Processes.
- Contractors and Subcontractor eligible for this Full Program Audit must include those performing on-going maintenance services, turnaround services, major renovation, installation, and/or specialty services on-site at PSM covered facilities.
  - GBR shall perform a Full Program Audit of each nested (resident) Contractor at least once every three (3) years.
  - The Full Program Audit may, at the discretion of MPC, be conducted at the PSM covered facility and/or at Contractor offices.
  - The Full Program Audit may, at the discretion of MPC, be conducted by MPC personnel, or by a third-party auditor.
- The periodic Full Program Audit will include an assessment that the Contractor/Subcontractor is fulfilling their responsibilities required by the PSM regulation. Specifically, this assessment is to confirm that:
    - Contract employees are being trained on applicable work practices necessary to safely perform their job (e.g., safe work practices, safety procedures, task procedures),
    - Contract employees are instructed on known potential fire, explosion, and toxic hazards (if not included in training provided by the site PSM covered facility),
    - Proper training documentation has been developed and is available, and
    - The Contractor has implemented a program to assure that their employees follow safety rules and conducts periodic audits/evaluations to confirm that employees are following safety rules.
  - The Contractor has advised the Refinery of any unique hazards associated with their work.
  - The periodic Full Program Audit will include confirmation that applicable criteria used in the Contractor Safety Pre-Qualification Process are utilized by Contractor during performance of services.
    - The Full Program Audit will include Contractor/Subcontractor safety program conformance while conducting work at GBR.
    - If the written safety programs of the Contractor are evaluated during screening process, then the evaluation Full Program Audit may include confirmation that Contractor employees are trained on the written safety programs.
  - The results of each periodic Full Program Audit must be:
    - reviewed with the Contractor or Subcontractor,
    - tracked to closure if there are significant recommendations, and
    - documented and retained per the applicable BRC records retention guidelines.
    - The Contractor or Subcontractor must respond to the audit findings in a prompt and timely manner. The auditor will provide a due date

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

for the responses. If a Contractor or Subcontractor cannot meet the due date, they must document and communicate the reasons why they are unable to comply, and they must provide a date when they will be able to comply.

- GBR Supply Chain will be involved during the audit discussions and they will attend the final audit review meeting.
- **Field Verification Audits:**
  - Except as otherwise provided herein, GBR has implemented a process with the intent to conduct and document at least one (1) audit of routine, ongoing safety requirements (Field Verification Audit) of every Contractor performing work on or adjacent to Covered Processes on at least an annual basis.
    - The Field Verification Audit will ensure that the Contractor / Subcontractor is conducting their work safely and in compliance with applicable PSM and other OSHA regulations as well as GBR safety procedures and rules.
    - Field Verification Audits shall be conducted by a qualified GBR employee or contract employee including, but not limited to Operators, Maintenance Coordinators, Safety Professionals, PSM Coordinators, and/or Contract third-party auditor.
    - Field Verification Audits shall be documented in writing by the person conducting the audit. It is recommended that the audit is conducted using a “checklist format” substantially in the form of Appendix A: Contractor Field Verification Audit Checklist.
    - Field Verification Audits shall include verification of the regulatory and skill training for a sample of the contractor crew onsite. Verification of regulatory and skill training will require up-to-date training documentation provided by the Contractor Company. GBR shall retain completed Field Verification Audit Checklist and documentation supporting the regulatory and skill training in compliance with records retention guidelines.
- **Tier 1 PSM Audit:**
  - GBR has established a Tier 1 audit schedule to ensure that programs are in place to identify areas for improvement and meet PSM/RMP requirements. The scope of Tier 1 audits will be determined by HES professionals or other facility management. This level of audit will utilize simple checklists developed by or under the supervision of HES professionals and is performed by facility personnel in the form of Contractors Audit Form.
    - Tier 1 Audit Protocols shall be conducted by element teams and consist of audit team lead and appropriate number of team members knowledgeable in the regulatory requirements and proper auditing techniques.
    - Tier 1 Audit Protocols shall review 25% of current contractor/subcontractor companies performing work on or adjacent



Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

to Covered Processes at least once during each calendar year to verify proper approval to work on site. The 25% should include as follows:

- Randomly select 2 subcontractors
- Randomly select 1 contractor that has been on site for less than a year
- Randomly select from the remaining contractors to get to 25%
- Of the selected contractors/subcontractors, 3 contractors/subcontractors will be audited, interviewed, and observed to ensure contract/subcontract workers are adequately trained in, but not limited to:
  - Potential fire, explosion, and/or toxic hazards related to their work and the process
  - Site-specific safety rules
  - Applicable regulatory and skill training records are up-to-date
  - Is the contractor evaluating his or her own HES/PSM performance
  - Evidence contract employees have been trained in the facility's emergency response plan
  - Are contractors aware of and complying with the control of entrance procedure
- GBR shall retain its Tier 1 PSM/RMP Tier 1 audit reports, findings and supporting documentation with record retention guidelines.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

## 5.0 Contract Employer Responsibilities

### 5.1 PSM/RMP Regulation

Contract Employer [Contract Owner or Operator] Responsibilities (3)[c]

(i)[1] The contract employer [contract owner or operator] shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.

(ii)[2] The contract employer [owner or operator] shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.

(iii)[3] The contract employer [contract owner or operator] shall document that each contract employee has received and understood the training required by this paragraph [section]. The contract employer [contract owner or operator] shall prepare a record which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training.

(iv)[4] The contract employer [contract owner or operator] shall assure that each contract employee follows the safety rules of the facility [stationary source] including the safe work practices required by (f)(4) of this section [§68.69(d) of this part].

(v)[5] The contract employer [contract owner or operator] shall advise the employer [contract owner or operator] of any unique hazards presented by the contract employer's [contract owner's or operator's] work, or of any hazards found by the contract employer's [contract owner's or operator's] work.

### 5.2 Contractor Responsibilities

Contractor firms shall adhere to the following contractor responsibilities:

- Train each Contractor and Subcontractor employee in the safe work practices and site-specific safety rules necessary to perform his or her job prior to such employees beginning work on or adjacent to a Covered Process.
- Instruct each Contractor and Subcontractor employee in the known potential fire, explosion, toxic release, or unique hazards related to his or her job and the process, and the applicable provisions of the applicable emergency action plan.
- Document that each Contractor and Subcontractor employee has received and understood the required training. Documentation of the training shall include the identity of the contract employee, the date of the training, and the means used to verify that the training was understood.
- Assure that each Contractor and Subcontractor employee follows the safety rules of the facility for which they are providing services, including the safe work practices.
- Advise appropriate GBR personnel of any unique hazards presented by the contract employer's work, or of any hazards identified or discovered during performance of contract employer's work.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

- Provide access to Contractor and Subcontractor employee training records, safety programs, etc.
- Before commencing any work, Contractor is required to visit the [GBR Contractor Safety Website](#) to obtain an updated copy of the Galveston Bay Refinery Safety Rules and Procedures (User Name is GBR and Password is Lonestar). Contractor is required to provide an updated copy of the Galveston Bay Refinery Safety Rules and Procedures and attachments related to the work that will be performed to its employees & subcontractors and to ensure that its employees & subcontractors are trained and knowledgeable of the information provided therein. Training materials and training records for all contractor employees on the Galveston Bay Refinery Safety Rules & Procedures related to the work they perform will be audited.

### 5.3 BRC Responsibility

BRC is prepared to support Contractors and Subcontractors working on-site by maintaining a process to ensure that:

- all known fire, explosion, toxic release and unique hazards have been communicated to Contractor and Subcontractor employers, and
- site specific safety rules and GBR safe work procedures have been communicated to all Contractor and Subcontractor employers.

## 6.0 Training

### 6.1 Training Requirements

The following training for those affected by this standard is required by roles listed in the table below:

Role	Training Subject
HES&S Managers and Division Managers or Refining HES&S Manager and Refining Senior Vice President	Requirements of the Temporary Approval program and their role and responsibilities when signing and authorizing Contractor and Subcontractor temporary approvals.
All employees who procure services from, coordinate or otherwise utilize Contractors and Subcontractors	General awareness training on the requirements of this standard.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

Supply Chain personnel	Roles and responsibilities of implementing the Contractor / Subcontractor Safety Pre-Qualification process.
Safety personnel	Trained on the roles and responsibilities of the Contractor/Subcontractor Pre-qualification and Safety Audit Process.

## 6.2 Contractor Training Table

The table below sets forth certain Contractor training requirements, by Contractor category.

<b>Contractor Category</b>	<b>Site Specific Contractor Safety Orientation</b>	<b>Process Overview</b>	<b>Covered Operator Training Program</b>	<b>MOC (if applicable to job roles)</b>	<b>ESS Training Matrix Requirements</b>
Involved in short work visits (1 day or less) to a process area and report to contract company supervision.	X	X			
Involved in longer work visit (1 day or greater) to a process area and report to contract company supervision.	X	X			
Resident or longer-term professionals that report to MPC Supervision	X	X		X	X
Resident or longer term administrative or clerical support staff that report to MPC Supervision	X				X
Contract Operators that report directly to MPC Supervision	X	X	X	X	X
Contract Craftsmen that report directly to MPC Supervision	X	X		X	X

# Appendix A: Contractor Field Verification Audit Checklist

## A.1 Checklist

The following is the Contractor Field Verification Audit Checklist ([RSP-1306-CKLST](#)). **Reference:** For the most up-to-date working copy of this checklist, go to [Contractor Field Verification Audit Checklist](#).

Yes - Contractor is in compliance No - Contractor is out of compliance NA - Not Mandated for the job			<b>Marathon Petroleum Corporation</b> Contractor Field Verification Audit Checklist (RSP-1306-CKLST)									
Date:			Permit #:			Permit Type:						
Time:			Supervisor:									
Contractor:			MPC Coordinator:									
Location:			Work Description:									
Auditor:												
Personal Protective Equipment				Hot Work				General				
Yes	No	NA		Yes	No	NA		Yes	No	NA		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	HARDHAT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FIRE WATCH IN ATTENDANCE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	LADDERS INSPECTED & IN GOOD CONDITION	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EYE PROTECTION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FIRE EXTINGUISHERS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SCAFFOLDS TAGGED AND UPDATED	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FALL PROTECTION (if required)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AIR HORN & VEST	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EXT. CORDS & POWER TOOLS IN GOOD CONDITION	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FACE SHIELD (if required)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NAME I.D. BACK OF PERMIT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PROPERLY BANDED & COLORED HOSES USED	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	HEARING PROTECTION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	COMMUNICATION PROCEDURE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GFCIs BEING USED	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	RESPIRATOR (if required)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	UPDATED GAS TESTING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	LOCKBOX IN PLACE	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GLOVES (if required)	<b>Confined Space</b>				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OWNING DEPARTMENT LOCK IN PLACE	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FIRE RETARDENT CLOTHING	Yes	No	NA		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PERSONAL LOCKS WITH NAMES IN USE	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SAFETY SHOES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ATTENDENT PRESENT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	BLINDS IN PLACE	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	H2S MONITOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	COMMUNICATION PROCEDURE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PROPER LIGHTING IS BEING USED	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WELDING PPE (if required)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	RADIO CHECK	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	BARRICADES ARE TAGGED	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GOGGLES (if required)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	RESCUE PERSONNEL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PROPER HAZARD SIGNS ARE POSTED	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CHEMICAL CLOTHING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	UPDATED GAS TESTING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GENERAL HOUSEKEEPING	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OTHER: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AIRMOVERS IN PLACE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	HAZCOM - CONTAINERS PROPERLY ID	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EXCAVATION > 4FT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MOTORIZED EQUIPMENT IN GOOD CONDITION	
Work Permits				Based on Interviews with Contractors and Supervisors:								
Yes	No	NA		Yes	No	NA		Yes	No	NA		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WORK PERMIT FOLLOWED	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ARE CONTRACTORS UP TO DATE ON THEIR REGULATORY AND THEIR CRAFT SKILLS TRAINING?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	JOINING JOBSITE VISIT PERFORMED	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ARE CONTRACTORS KNOWLEDGEABLE ON POTENTIAL HAZARDS IN THEIR WORK AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PROCESS HAZARD OVERVIEW	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ARE CONTRACTORS KNOWLEDGEABLE ON THE EMERGENCY RESPONSE PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ENERGY ISOLATION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ARE CONTRACTORS KNOWLEDGEABLE ON THE NEED TO FOLLOW REFINERY WORK PRACTICES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PROPER PERMIT EXTENSION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ARE CONTRACTORS KNOWLEDGEABLE ON NEED TO IMMEDIATELY REPORT ANY WORK PLACE INJURY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PROPER SIGNATURES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ARE CONTRACTORS KNOWLEDGEABLE ON NEED TO INFORM THE REFINERY OF UNIQUE HAZARDS THAT THEIR WORK MAY	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
				Samplene of crew being audited (pick 3-4). List name and GBR Badge Number of each person below:								
				Name				Badge Number				
				1								
				2								
				3								
				4								
Compliance												
Yes	No	NA										
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS CONTRACTOR WORKING UNDER A TEMPORARY APPROVAL RESULTING FROM FAILURE TO MEET COMMON VALUATION CRITERIA?									
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS CONTRACTOR MITIGATION PLAN BEING FOLLOWED, WHERE APPLICABLE?									
Comments												

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: <b>PSM Contractor Site Plan</b>	Doc Number: RGD-PS-000020-GB	Rev No: 0

## Approvals:

 <hr/> ES&S Manager	 <hr/> Date
 <hr/> Supply Chain Manager	 <hr/> Date
 <hr/> PSM Coordinator	 <hr/> Date

## Revision History

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original Issue.	J Smith	GBR Staff	12/30/2019	12/30/2019