

Doc Custodian: Safety Supervisor	<b>Marathon Kenai Refinery</b>  <b>Contractor Safety Management</b>	Doc No.: RSW-1306-KE Rev No: 2
Approved By: ES&S Manager		<b>Kenai Refinery Safe Work Procedure</b>
Revision Approval Date: 9/27/23		Next Review Date: 10/30/2025

## Overview

<b>Purpose</b>	The purpose of this document is to comply with Contractor requirements of the Corporate Process Safety Management (PSM) Standard, define the pre-qualification process for Contractors performing safety sensitive services on behalf of Marathon Petroleum Corporation and detail additional local requirements for contractor onboarding/admittance.
<b>Scope</b>	This standard applies to all contractor personnel performing work for MPC at the Kenai Refinery, KLNG, KPL and Nikiski terminal and MPC personnel responsible for hiring, managing, and utilizing contractors.
<b>Records Retention</b>	Printed copies of this document should not be retained more than 12 months. Any revision to this document will be retained indefinitely.

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## 1.0 References

### 1.1 Refining References

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

Number	Description
SAF-4004	Contractor Safety Management Standard
RSP-1306	PSM/RMP Contractors
PSM-1070	MPC Process Safety Management (PSM) Standard
RSP-1308	PSM/RMP Mechanical Integrity
RSP-1100-001	Turnarounds (TAR)

### 1.2 Industry References

The table below lists the industry references used with this document.

Number	Description
API Rec. Practice 2221	Contractor and Owner Safety Program Implementation, August 2004
API Rec. Practice 2220	Improving Owner Contractor and Safety Performance

### 1.3 Regulatory References

The table below lists the regulatory references used with this document.

Number	Description
EPA	General Guidance on Risk Management Programs for Chemical Accident Prevention; April 2004
EPA RMP 40 CFR Part 68, Subpart G	Risk Management Plan
OSHA 1910.110	Process Safety Management, 2000
OSHA 3132	Process Safety Management, 2000
OSHA 3133	Process Safety Management Guidelines for Compliance, 1994
OSHA CPL 2-2.45A CH-1	Compliance Directive, September 13, 1994
OSHA CPL 03-00-010, 03-00-004	Petroleum Refinery Process Safety Management National Emphasis Program; August 2009
OSHA 29 CFR 1910.119	Process Safety Management
OSHA CFR 1910.119	OSHA interpretations; 3/16/05; 3/7/06
AKDOL Reg 8 ACC, Chapter 61, Subchapter 18	Division of Labor Standards and Safety Statute, Process Safety Management of Highly Hazardous Chemicals, Element 6-Contractor Safety

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**1.4 Terms & Definitions**

The following acronyms, definitions, and terms are used in this document:

<b>Term</b>	<b>Definition</b>
<b>Common Evaluation Criteria (CEC)</b>	Safety performance criteria used to determine if Contractors qualify to perform services at MPC locations, as outlined in <i>Appendix A</i> .
<b>Consultant</b>	A non-MPC 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 Standard, they will be considered a Contractor and required to comply with this Standard.
<b>Contractor and Subcontractor</b>	<p>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 (including Water, Electric, Gas, Phone, Internet, Cable), Sales Representatives, Tankerman, third-party right-of-way owners, Vendors, and Visitors. Utilize the Contractor Decision Flowchart (<i>Appendix D</i>) to assist in decisions (Motor Carriers &amp; Tankerman have separate vetting processes).</p> <p><u>NOTE:</u> 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 that do not meet the Common Evaluation Criteria, using a Temporary Approval per section 6.0 of this Standard is appropriate to allow specific risk mitigation tools to be implemented for the specific hazards that the Contractor may encounter.</p>
<b>Contractor Risk Mitigation Tools</b>	These are controls that when incorporated will facilitate a higher level of Contractor performance and compliance with regulations and Standards.
<b>Contractor Safety Management Team</b>	A cross functional team of MPC employees consisting of representatives from Corporate Safety, Refining - Safety, Administrative Services HES, Supply Chain and the MPC Law Organization.
<b>Contractor Sponsor</b>	The MPC employee who retains the approved Contractor and is accountable for its performance; ensures that contractor work is performed safely and in compliance with location, and state and federal requirements. (This role may be filled by Project Manager, Planner, PIC, etc.)
<b>Covered Process</b>	<p>A PSM/RMP covered process. Any activity involving a highly hazardous chemical including any use, storage, manufacturing, handling or on-site movement of such chemicals, or combination of these activities. For purposes of this definition, any group of vessels which are interconnected and separate vessels which are located such that a highly hazardous chemical could be involved in a potential release shall be considered a single process.</p> <p>A process that has a regulated substance present in more than a threshold quantity as determined under 29 CFR 1910.119(a)(1) or 40 CFR 68.115.</p>

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<b>Department of Transportation (DOT) Operator Qualification (OQ) Work</b>	Qualification requirements Contractors are required to complete prior to performing covered tasks on a DOT OQ pipeline facility.
<b>Experience Modification Rate (EMR)</b>	Workers Compensation insurance premium adjustment that anticipates future performance based on past experience and industry data.
<b>ISNetworld (ISN)</b>	A web-based third-party administered database that assists with satisfying government and MPC specific recordkeeping and management requirements relating to Contractor evaluation and selection.
<b>Job Safety Analysis (JSA)</b>	A technique that focuses on job tasks to identify hazards and mitigations before beginning the job. It focuses on the relationship between the work, the task, the tools, and the work environment. Sometimes referred to as a Job Hazard or Task Hazard Analysis (JHA).
<b>Life Critical Activities</b>	Activities, as defined by the Organization, that have a significant potential for serious injury, illness or death resulting from failure to comply.
<b>Management of Change (MOC)</b>	Process to manage changes (except for “replacements in kind”) to process chemicals, technology, equipment, procedures, and facilities that affect a covered process.
<b>MPC Representative</b>	Any employee (MPC 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, MPC Supervisor, Directly Supervised Contractor (DSC) working on behalf of MPC, MPC Safety Rep).
<b>Pre-Qualification</b>	A screening process used to evaluate Contractor history and experience to determine if the contractor has the ability to accomplish the desired job tasks without compromising the safety and health of the Contractor employees, MPC employees, the public or the environment.
<b>Process Safety Information (PSI)</b>	A compilation of written information concerning process chemicals, process technology, and process equipment which is essential to an effective process safety management program and to a process hazard analysis. The compiled information designated as PSI enables employers and employees involved in operating a process to identify and understand the hazards posed by processes containing highly hazardous chemicals.
<b>Process Safety Management (PSM)</b>	OSHA 1910.119 is a regulation that looks at all processes that involve handling, using, storing, moving, or manufacturing highly hazardous chemicals.
<b>Review and Verification Services (RAVS)</b>	Review & Verification of contractor written safety programs by ISNetworld.

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<b>Safety Sensitive Services</b>	<p>Work performed at Facilities owned, leased, operated, or controlled by MPC, that may affect personal &amp; process safety including but not limited to:</p> <ul style="list-style-type: none"> <li>• Work performed on process equipment or within a process boundary.</li> <li>• Work that involves Life Critical Activities or other hazardous activities as defined by the Organization without prior approved pre-defined risk mitigations.</li> </ul> <p><u>NOTE:</u></p> <ul style="list-style-type: none"> <li>• Utilize the Safety Sensitive Decision Flowchart (<i>Appendix E</i>) or consult the appropriate Supply Chain / ESS Representative to assist in decisions.</li> <li>• 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, communication equipment).</li> </ul>
<b>Safety Status Met</b>	Designation assigned to a Contractor who meets or exceeds all the requirements of the Common Evaluation Criteria.
<b>Safety Status Met-With Restrictions</b>	Designation assigned to a Contractor who meets or exceeds the requirements of the Common Evaluation Criteria and is subject to Work Restrictions.
<b>Safety Status Not Met</b>	Designation assigned to a Contractor who does not meet all the requirements of the Common Evaluation Criteria.
<b>Service Contract</b>	A signed contract or agreement with a Contractor that provides terms and conditions governing services provided by Contractor to Marathon. The Service Contract may provide for a Job Order written against the Service Contract to define individual scopes of work. The Service Contract may be a Marathon model form contract, revised to reflect negotiations between Marathon and Contractor, or a non-standard form provided by Contractor.
<b>Supplier</b>	A person or entity that is the source for goods or services. A supplier could provide goods or services to MPC 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 Standard.
<b>Temporary Approval (TA)</b>	If the Refinery determines it is necessary to use a Contractor that does not meet the Common Evaluation Criteria for any reason, then the Temporary Approval Process must be utilized (see section 6.0)
<b>Total Recordable Incident Rate (TRIR)</b>	A measure of the rate of recordable workplace injuries, normalized per 100 workers per year. Recordable rate expressed as the number of recordable injuries and illnesses x 200,000 / number of hours worked for a given period of time.
<b>Vendor</b>	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 MPC 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.
<b>Work</b>	Any physical task performed with tools or equipment by a contractor. (Excluding: Consulting, data collecting, startup observations, etc.).

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<b>Work Restriction</b>	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 Written Program Exemption Form ( <i>Appendix B</i> ).
<b>Refinery Safe Work Practices (RSW)</b>	Training in any procedures or skill required to safely perform required job tasks. If the contract employees will be performing maintenance on the on-going integrity of process equipment, the plant or work zone, this will include overview of the process, plant or work zone, its hazards, and operational or maintenance procedures applicable to the job task
<b>Written Program Exemption Review</b>	A review of a contractor exemption request for a written program typically required by MPC's third party vetting firm. This review is completed by the Contractor Safety Team and applies across MPC.



## 2.0 Roles and Responsibilities

### 2.1 Roles and Responsibilities

The table below describes the roles and responsibilities related to this document.

Roles	Responsibilities
<p align="center"><b>Site Supply Chain Manager or Designee</b></p>	<p>(a) Works with <b>PSM Coordinator and Safety Supervisor</b> to develop and implement a written program for Contractors and Subcontractors:</p> <ul style="list-style-type: none"> <li>– operating a Covered Process,</li> <li>– performing maintenance or repair, turnaround, major renovation, installation, or specially work on a Covered Process, and</li> <li>– working adjacent to Covered Processes.</li> </ul> <p>(b) Works with <b>PSM Coordinator and Safety Supervisor</b> to ensure that the written program covers Contractors and Subcontractors who:</p> <ul style="list-style-type: none"> <li>– could affect the containment of Highly Hazardous Chemicals or regulated materials with the covered process, and</li> <li>– could be affected by loss of containment of a Highly Hazardous Chemical or Regulated Substance.</li> </ul> <p>(c) Ensures that Contractors and Subcontractors working on or adjacent to a Covered Process are governed by the appropriate MPC Service Contract.</p> <p>(d) Utilizes the applicable, established MPC 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 work commencing.</p> <p>(e) Supports the defined temporary approval process that provides for limited use of Contractors and Subcontractors that do not meet established MPC contractor safety prequalification screening criteria (the “Common Evaluation Criteria”) and provides for mitigation steps implemented to reduce risk to an acceptable level.</p> <p>(f) Prior to commencement of work, ensures that Contractors and Subcontractors are provided with:</p> <ul style="list-style-type: none"> <li>– the applicable Organizational or site-specific safety rules applicable to the scope of work to be performed,</li> <li>– the applicable provisions of the emergency action plan, and</li> <li>– an overview of process hazards related to the Contractor’s work and the Covered Process.</li> </ul>
<p align="center"><b>Process Safety Management (PSM) Coordinator</b></p>	<p>(a) Works with <b>Site Supply Chain Manager and Safety Supervisor</b> to develop and implement a written program for Contractors and Subcontractors:</p> <ul style="list-style-type: none"> <li>– operating a Covered Process,</li> <li>– performing maintenance or repair, turnaround, major renovation, installation, or specially work on a Covered Process, and</li> <li>– working adjacent to Covered Processes.</li> </ul> <p>(b) Works with <b>Site Supply Chain Manager and Safety Supervisor</b> to ensure that the written program covers Contractors and Subcontractors who:</p> <ul style="list-style-type: none"> <li>– could affect the containment of Highly Hazardous Chemicals or regulated materials with the covered process, and</li> <li>– could be affected by loss of containment of a Highly Hazardous Chemical or Regulated Substance.</li> </ul>

<p><b>Safety Supervisor Or Designee</b></p>	<p>(a) Assists the Site Supply Chain Downstream manager to utilize the applicable, established MPC 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 work commencing.</p> <p>(b) Assists the Site Supply Chain Manager in reviewing Contractor and Subcontractor Safety Pre-Qualification information prior to awarding work.</p> <p>(c) Approves risk mitigation for Contractor Temporary Approvals.</p> <p>(d) Establishes and maintains a log of Contractor and Subcontractor Injury and Illnesses related to their work in Covered Process areas.</p> <p>Note: The Contractor and Subcontractor will be responsible for providing the information necessary to populate this log.</p> <p>(e) Implements the defined temporary approval process that provides for limited use of Contractors and Subcontractors that do not meet established MPC contractor safety prequalification screening criteria (the “Common Evaluation Criteria”) and provides for mitigation steps implemented to reduce risk to an acceptable level.</p> <p>(f) Prior to commencement of work, provides Contractors and Subcontractors with:</p> <ul style="list-style-type: none"> <li>- The applicable Organizational or site-specific safety rules applicable to the scope of work to be performed,</li> <li>- The applicable provisions of the emergency action plan, and</li> <li>- An overview of process hazards related to the Contractor’s work and the Covered Process.</li> </ul> <p>(g) Periodically audits Contractors and Subcontractors to determine their performance in the following areas:</p> <ul style="list-style-type: none"> <li>- The applicable Organizational or site-specific rules applicable to the scope of work to be performed,</li> <li>- The applicable provisions of the emergency action plan, and</li> <li>- Any general process hazards related to the contractors work prior to commencing work.</li> </ul> <p>(h) Performs a Safety Audit of a representative number of Contractors and Subcontractors performing work on or adjacent to a covered process as defined in this standard.</p> <p>Note: The results of the periodic evaluations must be reviewed with the Contractor/Subcontractor.</p>
<p><b>Permit Issuer (Owning Department)</b></p>	<p>(a) During the joint job site visit and during the permitting process, informs the Contractor or Subcontractor employees of the known potential fire, explosion, toxic release, or unique process hazards related to the Contractor’s work and the Covered Process where the work is being permitted.</p> <p>(b) Informs the Contractors or Subcontractors of any unique emergency action plan provisions of the Covered Process where the work is being permitted.</p>

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<b>MPC Contractor Sponsor</b>	<ul style="list-style-type: none"> <li>(a) Verifies the Contractor has an acceptable ISN rating prior to using them.</li> <li>(b) Identifies the types of work activities to be performed by a Contractor, to include whether the work meets the definition of DOT OQ covered work (e.g., Operator Qualified Tasks (OQ)).</li> <li>(c) Conducts an initial project review on the minimum safety expectations of MPC Kenai.</li> <li>(d) Maintains current knowledge of Contractor’s ongoing activities by conducting field audits.</li> <li>(e) Ensures that Contractors performing Safety Sensitive work have completed a JSA and that it is reviewed daily by workers and revised when conditions change.</li> <li>(f) Initiates the Temporary Approval process. Monitors the mitigation or improvement plan required under a Contractor’s TA, when necessary.</li> <li>(g) Leads or verifies meetings with Contractors are being conducted at an appropriate frequency based on the level of risk associated with the work being performed. The meetings shall include a review of completed tasks, upcoming or in progress hazardous tasks, and the control measures to be used.</li> <li>(h) Ensures all contractor incidents are entered into the MPC Incident Management System.</li> <li>(i) 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.</li> <li>(j) Ensures identification of risk management requirements for temporary approvals, and implementation in the field.</li> </ul>
<b>Employees</b>	Responsible for familiarity with and application of the Safe Work Procedure in all applicable daily work activities.
<b>Contractors</b>	Responsible for familiarity with and application of this Safe Work Procedure in all applicable daily work activities at MPC facilities or property. Contractors must comply with all Kenai Refinery Security standards.

**2.2 Training requirements**

The Kenai Training Site Plan, RGD-1305-KE and related Master Course Curriculums contain the initial and refresher training requirements related to this Safe Work Procedure.

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**2.3 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 Level 1</b>	<b>Site Specific Contractor Safety Orientation Level 1&amp;2</b>
Escorted, Short duration contractor	X	
Short duration non-process contractors / visitors	X	
Unescorted contractor		X
Directly Supervised Contractor		X

**2.4 PSM-Covered Process Training**

Should a contractor provide the Kenai Refinery with employees or subcontractors to operate a PSM-Covered process, then those employees shall be trained to the same extent as direct-hire employees “involved in operating a process” under paragraph (g) of 29 CFR 1910.119.

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## 3.0 PSM Employer Responsibilities

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### 3.1 Service Contract

Kenai refinery must ensure that Contractors working on or adjacent to a Covered Process are governed by the appropriate Service Contract. MPC 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 MPC, Supply Chain shall determine the appropriate Model Form Contract based on the services the Contractor is eligible to perform.

3.1.1 Contractors executing the following MPC 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 MPC:

- Major Services Contract,
- Emergency Response Services Contract,
- Environmental Services Contract,
- Engineering, Procurement, Construction and Construction Management Contract, or
- Master Environmental Services Contract.

3.1.2 Contractors executing the following MPC 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 contractor vetting 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
- Engineering, Procurement & Construction (Project Specific).

3.1.3 Contractors performing work at facilities on building projects that do not involve process equipment may be governed by the Non-Process Asset Contractor Qualification (NPACQ) process. This process will follow:

Component Contractor Representative will:

- a) Work with local operations, applicable SMEs for the associated hazards, and contractors to create site specific work plan.
- b) Review regulatory program requirements with contractor to ensure compliance.
- c) Review applicable training and obtains verification of the training from the contractor.
- d) Submit final plan for approval by Safety Manager, Facility Manager, and others as necessary based on the scope of work (Environmental, ES&S Manager, etc.).
- e) The final plan will be provided to the approvers prior to signing and will include, at a minimum: the oversight requirements by local management to ensure compliance with the plan, the requirement for the Contractor Safety Representative or his/her designee to audit the compliance with the final plan at least once through a site visit, and the mitigation strategies employed at the site to ensure compliance with applicable federal, state, local regulations and Marathon Petroleum Specific Standards.

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**3.2 Contractor Selection**

- 3.2.1 To perform Safety Sensitive Services on-site at MPC owned, leased, operated or controlled locations, Contractors shall successfully complete the requirements of:
- An evaluation conducted by the authorized third-party contracting vetting firm, or
  - An alternative evaluation process can be used if an Exemption to this portion of the Standard has been approved per GEN-1001.
- 3.2.2 The MPC Kenai Work Code Matrix (*see Appendix L*) is a tool that allows the MPC Contractor Sponsor, Project Manager, PIC, etc. to determine, well ahead of the work start date, if ISNetworld compliance is required based on work type performed. They can then alert their prospective contractors of the requirement for ISN compliance in advance to avoid schedule disruption. This document categorizes work activities as “Non-Safety Sensitive” and “Safety Sensitive.” Contractors desiring to perform Safety Sensitive work at the Kenai Refinery, KPL, KLNG or the Nikiski Terminal, must hold a current ISNetworld account and maintain “Safety Status Met” or “Safety Status Met w/ Restrictions” rating.
- 3.2.3 MPC will employ Common Evaluation Criteria across the Organization to assist in evaluating Contractors (*See Appendix A*). Contractors shall only be hired for services they have been pre-qualified to perform.
- 3.2.4 For more information on MPC Kenai’s Contractor On-Board workflow for Safety Sensitive contractors, *see Appendix I*.
- 3.2.5 If a contractor utilizes temporary workers, the temporary staffing agency is not required to be approved by the third-party vetting firm (ISN).
- 3.2.6 The Contractor Safety Management Team may perform a separate evaluation of Contractors facing severe legal, criminal, or other ethical allegations/penalties.
- 3.2.7 MPC’s Supply Chain Organization 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.
- 3.2.8 Supply Chain shall update the Contractor Database as needed with approved Written Program Exemption Review Form information.
- 3.2.9 Supply Chain shall update the Contractor Database as needed with Temporary Approval Information.
- 3.2.10 Contractors that meet all requirements of the Common Evaluation Criteria shall be identified as *Safety Status Met*. If a Contractor meets all the CEC but is subject to work restrictions, the Contractor shall be identified as *Safety Status Met-With Restrictions*.

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**3.3 Pre-Work Activity**

Inform Contractors and Subcontractors of the following:

- (a) Applicable provisions of the emergency action plan.
- (b) Known potential fire, explosion, toxic release, or unique hazards related to the Contractor’s work and the Covered Process.
- (c) Applicable process hazard analyses (PHAs) and all other information developed under the regulations to employee of Contractors and Subcontractors as requested.
- (d) Any relevant PSM information when the information relates directly to their work responsibilities.
- (e) Procedures related to joint jobsite visit and permitting requirements to ensure that pre-job safety meetings are conducted with the Contractor(s) to review the safety aspects of the work to be performed in a Covered Process.
- (f) Site specific safety rules and MPC safe work procedures.
- (g) Responsibility to intercede or report to management when they observe unsafe acts or conditions related to contractor activities.
- (h) Responsibility to follow the Kenai Refinery’s safety management programs and ensure they do not endanger the safety of those working nearby.

Note: Subcontractors may be informed directly, or through the employing Contractor.

**3.4 Injury Log and Safety Performance Records.**

The Kenai Refinery shall maintain contractor safety performance records. Records maintained should include those documenting the contractor’s performance through the life of the contract.

- (a) Injury and illness logs,
- (b) Incident investigations for incidents involving Contractors,
- (c) Participation in site programs and initiatives,
- (d) Pre-qualifications, TAs and performance evaluations,
- (e) Inspection checklist results,
- (f) Other performance-related records.

Contractors and Subcontractors will be responsible for providing the information necessary to populate and update the injury/illness log.

Records shall be retained in compliance with MPC records retention guidelines.

**3.5 Contractor Audits**

Each MPC Refinery must participate in the following Contractor performance assessments, consisting of full program audits and field verification audits, as more completely described in this section:

- 3.5.1** MPC Refining will determine the eligibility for both Full Program Audits and/or Field Reviews for both Contractors and Subcontractors that perform maintenance services, turnaround services, major renovations/projects, installation and/or specialty services on-site at PSM covered facilities. MPC Refining shall establish the coming year’s Contractor full program audit schedule by December 15<sup>th</sup> of the preceding year. Eligibility for a full program audit will be based on three identifiers:
  - (a) The number of sites the contractor performs safety-sensitive work (MPC must spend at least a 3-year average of \$50,000 for a Contractor to be considered working on a site).
  - (b) The amount of money spent on the contractor over the previous 3-year average.
  - (c) The level of risk of the contractors work scope.
- 3.5.2** Contractors who only provide engineering services, direct report personnel, consultants and goods vendors will not be eligible for this program.

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- 3.5.3** Using these identifiers MPC Refining will decide which type of audit each Refinery must perform on the Contractor. There are four different audit types that a Contractor can fall under:
- (a) 3-Year Full Program Audit and Annual Required Field Review
  - (b) 5-Year Full Program Audit and Annual Required Field Review
  - (c) Annual Field Review Only (required)
  - (d) Annual Field Review as Necessary (not required)
- 3.5.4** Refining Safety shall provide the Full Program Audit (Deep Dive Audit) schedule for every Refinery on both the 3-year and 5-year cycles.
- 3.5.5** Each MPC Refinery must follow the Corporate Refining Schedule for Contractor Full Program Audits and Annual Field Review Audits (FAST Audits). See *Appendix K for QR Code for the FAST link*.
- 3.5.6** Every Refinery will be responsible for determining whether a Contractor requires a field review and the schedule the site should perform the field review if the Contractor falls within the “Annual Field Review as Necessary” category.
- 3.5.7** The Full Program Audit may, at the discretion of MPC, be conducted at the PSM covered facility and/or at Contractor offices.
- 3.5.8** The Full Program Audit may, at the discretion of MPC, be conducted by MPC personnel, or by a third-party auditor.
- 3.5.9** Refining Safety will determine what audit is required on each contractor based on Tables 1-3 in *Appendix J: Contractor Audit Scoring Tool*:
- (a) Refining Safety will contact Supply Chain and request a previous 3-year average “spend report” on the contractor that provide the amount of money spent and number of facilities using the contractor.
  - (b) Refining Safety will review the “spend report” and Table 2 to determine the multipliers for both “number of Facilities using the Contractor” and “Previous 3-year average spend”.
  - (c) Refining Safety will then evaluate what work scope the contractor will be providing using Table 3 to determine a Risk multiplier.
  - (d) Once Refining Safety has determined the number of facilities, the previous 3-year average spend and the risk level they will return to Table 2 and use the multipliers to determine a total score.

Example: “Contractor A” is working at four facilities and has a previous 3-year average spend of \$12MM. Table 3 determines that “Contractor A” will have multipliers of 2 (number of facilities) x 2 (previous 3-year average spend) x 20 (risk of work scope) = 80 (total score). Table 1 is used for scoring of the applicable audit level. A score of 80 shows that the contractor should receive a 3-year full program audit and required field review.

- 3.5.10** 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:
- (a) Contract employees are being trained on applicable work practices necessary to safely perform their job (e.g., safe work practices, safety procedures, task procedures),
  - (b) Contract employees are instructed on known potential fire, explosion, and toxic hazards (if not included in training provided by the site PSM covered facility).
  - (c) Proper training documentation has been developed and is available, and



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(d) 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.

**3.5.11** The Contractor has advised the Refinery of any unique hazards associated with their work or of hazards found by the contract employer's work.

**3.5.12** 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.

(a) The Full Program Audit will include Contractor/Subcontractor safety program conformance while conducting work at MPC locations.

(b) 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.

(c) Performance evaluations shall note the effectiveness of mitigation controls implemented to address safety deficiencies and note any improvements (or continued deficiencies) in the Contractor's safety program.

**3.5.13** The results of each periodic Full Program Audit must be:

(a) Reviewed with the Contractor or Subcontractor,

(b) Tracked to closure if there are significant recommendations, and

(c) Documented and retained per the applicable MPC records retention guidelines.

**3.5.14** Unless the Contractor Company falls under the "Annual Field Review as Necessary (Not Required)", each MPC Refinery must implement a process with the intent to conduct and document at least one (1) audit of routine, ongoing safety requirements (or FAST audit) of the Contractor performing work on or adjacent to Covered Processes on at least an annual basis.

(a) The FAST 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 MPC Refinery safety procedures and rules.

(b) FAST Audits shall be conducted by a qualified MPC employee or contract employee including, but not limited to Operators, Maintenance Coordinators, Safety Professionals, PSM Coordinators, and/or Contract third party auditor.

(c) FAST Audits shall be documented in electronic format by the person conducting the audit. It is recommended that the audit is conducted using a "checklist format" substantially in the form of Refining MPC/Contractor Field Audit Scoring Tool (FAST). See *Appendix K* for information on locating FAST.

### **3.6 Controlled Entry/TWIC Cards**

Entry to Refinery and process areas is controlled with Lenel security badging system.

A TWIC card is required for unescorted entry into KPL, KLNG and the tank farm at Nikiski Terminal. **TWIC (Transportation Workers Identification Cards):**

1. All contractors coming onsite to these areas are required to hold and have on their person a valid TWIC card unless escorted by an approved employee with their own TWIC card and unescorted access (Security maintains list of Authorized Approvers).
2. Exceptions can only be approved by Facility Security Officer or their designee.

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## 4.0 Contract Employer Responsibilities

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### 4.1 PSM Covered Contractor

1910.119 (h) Contractors.

1910.119 (h) (1) Application: This paragraph (section) applies to contractors performing maintenance or repair, turnaround, major renovations, 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.

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### 4.2 Contractor Responsibilities

Contractor firms shall adhere to the following contractor responsibilities:

- 4.2.1 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.
  - 4.2.2 Instruct each Contractor or 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.
  - 4.2.3 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. **For more information on MPC Contractor Health & Safety Training Program Requirements see Appendix H.**
  - 4.2.4 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.
  - 4.2.5 Advise appropriate MPC 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. At least 2 weeks prior to bringing new chemicals onsite, a Safety Data Sheet (SDS) must be submitted to the MPC ES&S Department, who will evaluate the SDS, process it through management of change (if required) and inform potentially affected personnel.
  - 4.2.6 Provide access to Contractor and Subcontractor employee training records safety programs, etc.
  - 4.2.7 Maintain *Safety Status Met, Safety Status Met -with Restrictions* in ISNetworld or an approved MPC TA for the duration of any Safety Sensitive work performed.
  - 4.2.8 For more information about MPC Kenai's requirements for Contractor Employee On-Boarding, Variance Requests and Safety and Security Requirements, **see Appendices F&G.**
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### 4.3 Job Safety Analysis (JSA)

Contractors performing safety sensitive work are required to:

1. Prepare a JSA for all tasks.
  2. Review the JSA daily if work is being performed that day.
  3. Revise the JSA when conditions change.
  4. Require the JSA to be reviewed by all Contractors assigned to the associated job and have them sign the JSA.
  5. Inform MPC Sponsor of any new chemicals that will be introduced into the MPC Kenai Refinery and provide a SDS in advance of bringing the chemical on site.
-

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**4.4 Drug-free Workplace Program**

- 4.4.1 **DOT OQ Work:** Before performing any DOT OQ work for MPC Kenai, the contract employer shall register with National Compliance Management Service (NCMS) and submit its Drug-Free Workplace Policy.
  - 4.4.2 **Non-DOT OQ Work:** Contractors performing Safety Sensitive work shall have a written, comprehensive Drug-Free Workplace Program, applicable to all of its employees and subcontractors before commencing work or providing services to the Kenai Refinery. The program must be at least as effective as MPC’s Drug-free Workplace Policy and include provisions for testing pre-employment, random, reasonable cause, and post incident.
-

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## 5.0 Contractor Written Program Exemption Review Requirements

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**5.1 Exemption Submission** A Contractor may submit a Written Program Exemption Review through MPC’s third-party vetting firm (ISN) 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. *See Appendix B for Written Program Exemption Form.*

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**5.2 Requirements** The Contractor Safety Management Team will recommend approval of the Written Program Exemption 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.

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**5.3 Project Specific TA** Waiver of individual safety program(s) will not be granted for project specific tasks. A project specific Temporary Approval could be utilized instead since a waiver removes the requirements for that Contractor across all MPC Components from that point forward.

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**5.4 Safety Status Met-With Restrictions** Contractors that meet all remaining requirements of the CEC and have an approved Safety Program Restriction(s) Request Form will be identified as Safety Status Met-With Restrictions in the Contractor Database.

- 5.4.1 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.
  - 5.4.2 Any safety program(s) that have been waived will be indicated as Restrictions in MPC’s third party vetting firm’s system, along with the completed review form to document justification.
  - 5.4.3 If the refinery is utilizing a Contractor that is identified as Safety Status Met-With Restrictions, the Safety Programs Waived section in the Contractor Database must be consulted to ensure work being completed will not require the program that was waived.
-

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## 6.0 Contractor Temporary Approval Requirements

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### 6.1 Criteria

If the Refinery 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. The Criteria must be indicated on Contractor Temporary Approval Form as one of the following:

1. **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 services during an active response. This Contractor cannot perform other services (e.g., environmental services, vacuum truck services outside of an active response). All OSRO listed on government-mandated lists are required to be approved in ISN or under a TA. If an active emergency response requires the use of a Contractor who is not approved in ISN 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 ISN or TA will be started for their use in the future.
  2. **No History:** A Temporary Approval granted to a Contractor because the criteria is not available because the Contractor is not in ISN or is in the process 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* for details on Written Program Exemptions).
  3. **Project Specific:** A Temporary Approval granted for a Contractor to perform a predetermined project specifically identified in the TA form (e.g., installation of an electrical unit). Work outside the scope of the specified project requires a separate TA.
  4. **Contractor Specific:** A Temporary Approval granted for a specific Contractor to perform work specified in the TA form (e.g., welding, security services, and scaffolding).
- 

### 6.2 TA Questions

If it is not clear if a Temporary Approval is required, the Contractor Safety Management Team shall be consulted. The Contractor Safety Management Team will evaluate if the Contractor meets the CEC’s and provide a final determination. If the Contractor Safety Management Team is reviewing whether a fatality is applicable and related to the type of service requested by MPC, they shall utilize *Appendix M – Fatality Review Questions*.

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### 6.3 Temporary Approval Process

The documented Temporary Approval must identify any additional safety measures or operational requirements necessary to allow Contractors and Subcontractors to work safely at the PSM covered facility and be signed and authorized by the Refinery ES&S Manager and the Refinery General Manager.

Where a temporary approval covers multiple PSM covered facilities, then the form must be signed by the Refining ES&S Manager and the Senior Vice President of Refining, and representatives from each Refinery that will use the temporarily approved Contractor or Subcontractor under the refining wide temporary approval. The temporary approval will be communicated to the Contractor Coordinator who will work with the Contractor and Subcontractors to ensure the additional safety or operational requirements are in place.

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**6.4 Delegation Authority**

The Refinery 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 Refinery, other than the HES&S Manager, as that person is already required to sign all Contractor Temporary Approval Forms. For more information see SAF-4004, Section 3.3.1

**6.5 TA Form Requirement**

A completed Contractor Temporary Approval Form shall include the following information:

1. A thorough explanation of the Contractor’s scope of work and/or types allowed.
2. The reasons for requesting a Temporary Approval.
3. Details about the risk mitigation measures Marathon Kenai will perform/require to ensure adequate safety.
  - It is Marathon Kenai’s responsibility to ensure the risk-mitigation measures are sufficient and complied with once the Contractor is onsite to perform services.
  - The Temporary Approval and risk mitigation measures shall be communicated to the Contractor with documented acknowledgment by the Contractor.

See **Appendix C** for example of *Contractor Temporary Approval Form*. Forms can be found on ES&S Share point page under *Contractors*.

**6.6 Grace Period**

In the event a Contractor is providing services on site (ongoing services) at the time they become non-compliant with the CEC, a Temporary Approval shall be implemented within thirty calendar days from the date of noncompliance if MPC Kenai wishes to continue utilizing that Contractor 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 TA is required prior to commencement of any new services not ongoing at the time the Contractor becomes non-compliant.*

**6.7 Temporary Approval Length**

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.

- If the CEC are still not met upon expiration, MPC Kenai must complete a new TA to cover the remainder of the three years or twelve quarters for which the TA is required with revised risk mitigation measures (if applicable).

Table 1- Temporary Approval Terms

Criteria Not Met	New Request	1 <sup>st</sup> Renewal	2 <sup>nd</sup> 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

**NOTE:** A copy of Contractor Temporary Approval Form shall be sent to the Corporate Safety-Safety Professional and the Supply Chain Representative of the requesting Refinery.

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## 7.0 Management of Contractors On-site/Contractor Risk Mitigation Tools

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**7.1 Risk Mitigation Tools** To facilitate compliance with federal, state, and industry regulations and with MPC standards, the following on-site Contractor Risk Mitigation Tools shall be incorporated:

- 7.1.1 Ensure contractors have the Safety Status Met or Safety Status Met-With Restrictions designation for work in the Contractor Database.
  - 7.1.2 Conduct site orientation training at MPC operating Facilities (or authorized online training when necessary) which shall include applicable provisions of the emergency action plan.
  - 7.1.3 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).
  - 7.1.4 Ensure Contractors employees are briefed on the hazards of the work to be performed and mitigation measures (e.g., participate in a JJSV, tail gate meeting, etc.).
  - 7.1.5 Ensure the Contractor is issued a Safe Work Permit when required.
  - 7.1.6 Ensure Contractor job sites are audited by MPC representative for life critical activities.
  - 7.1.7 Ensure Contractors are provided with relevant Process Hazard Overview per PSM-1070.
  - 7.1.8 MPC shall inform Contractors of a change in the process prior to start-up of the facility, work area, process or affected part of the process if the Contractor's work will be affected by the change.
-

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## **Appendix A: Common Evaluation Criteria (See form RSW-1306-01)**

Contractors, including sub-contractors, must meet the following minimum criteria in order to be eligible to perform safety-sensitive services on-site at MPC owned or controlled locations. Newly established companies without three years of data will be evaluated on the data that is available.

- 1) OSHA Incident Rate
  - a) Contractor's and/or sub-contractor's three-year <sup>1</sup>OSHA Recordable Incident Rate must be less than or equal to 4.00.
    - i) If a Contractor cannot provide data for the previous years, (e.g. The company has not been in business that long) and the three year TRIR is unable to be calculated, MPC will evaluate the reason and apply an "override" in MPCs third party vetting system until three years of data is available.
- 2) Experience Modification Rate (EMR)
  - a) Contractor's most recent year<sup>1</sup> must be less than or equal to 1.15.
- 3) OSHA Citations <sup>1</sup>
  - a) Contractor is disqualified if they have a citation for a willful violation related to the type of service requested by MPC during the past three years.
- 4) OSHA Severe Violators List
  - a) Contractor is disqualified if they are on OSHA's Severe Violators List.
- 5) Fatalities <sup>1 2</sup>
  - a) Contractor is disqualified if they have experienced an incident that resulted in a fatality within the past three years while performing work related to the type of service requested by MPC and deemed applicable. Utilize ***Appendix M*** -Fatality Review Questions to assist with determination.
    - i) If a company has not been in business for three years, MPC will apply an "override" to allow the contractor to get the points they deserve as long as there has not been a fatality during that time period.
- 6) Health & Safety Score
  - a) Contractors must receive a 95% average score of their written safety programs when audited by the third-party Contractor Vetting firm. The following programs require at least in 80% individual score when required by the services Contractors perform:
    - Cranes & Rigging,
    - Confined Space Entry,
    - Confined Space Rescue,
    - Fall Protection,
    - Hot Work, and
    - Lock-out Tag-out.
  - b) Only Sub-contractors that perform safety sensitive services at PSM/RMP sites are required to submit programs to MPC's third party contractor vetting firm.
- 7) DOT Drug & Alcohol Testing Program (where required)

<sup>1</sup> Updated statistical information must be provided by the contractor on or before March 31 of the succeeding year (e.g., 2015 information is due March 31, 2016). Companies with 10 or fewer employees that are not required by regulations to keep OSHA injury and illness records must still submit all required safety information as outlined in the Common Evaluation Criteria.

<sup>2</sup> The decision to continue or terminate safety-sensitive services ongoing at an MPC location as of the date of a contractor fatality requires coordination among the affected MPC Supply Chain, HES, Law and Operating Organizations in order to ensure mitigation of all associated risks.



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## Appendix B: Written Program Exemption Form- Kenai Refinery

Completion of the Written Program Exception Form indicates that the Organization(s) below request Written Safety Programs required by the Type of Work Matrix be waived because the Contractor will never perform services that require the Safety Programs listed below, for any MPC Organization. This Safety Program Waiver is not a job or project specific waiver, but if approved, waives the safety programs below until the contract expires. The Contractor Database will identify the Contractor as "Safety Status Met - With Restrictions" to prevent this Contractor from performing the services that are associated with the waived safety programs below.

**Contractor Name:** \_\_\_\_\_

**Contract Number:** \_\_\_\_\_

**MPC Requestor:** \_\_\_\_\_

**Kenai Refinery**

**Scope of Services:** \_\_\_\_\_

**Safety Program(s) Requested to be Waived:** \_\_\_\_\_

**Reason for Requesting Waiver:** \_\_\_\_\_

### Approval

I hereby approve the use of the above-referenced Contractor for execution of the work identified above at MPC locations within my area of responsibility.

**Requesting Organizational ES&S Manager:**

(signature) \_\_\_\_\_ Date: \_\_\_\_\_

(Please print name) \_\_\_\_\_

**Corporate Safety Supervisor:**

(signature) \_\_\_\_\_ Date: \_\_\_\_\_

(Please print name) \_\_\_\_\_

**If not approved, reason for rejecting the requested waiver:** \_\_\_\_\_

**Note:** If this waiver is not approved, the Contractor cannot be utilized until either the Safety Programs indicated above are in place and satisfactory with PEC, or a Temporary Approval is approved.

**Note:** Submit completed forms to the Corporate Safety Supervisor for consideration of approval.

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## Appendix C: Contractor Temporary Approval Form

**New Request**       **1<sup>st</sup> Renewal**       **2<sup>nd</sup> Renewal**       **Additional Renewal (if needed)**

This form is required because:

- 1) Contractor has failed to meet one or more of the Marathon Petroleum Company LP (“MPC”) Common Evaluation Criteria that establish minimum safety requirements for performing safety sensitive services on site at MPC locations; **or**
- 2) Contractor has initiated the Contractor Safety Pre-Qualification process but has not yet provided all of the safety information required to allow evaluation.

Requestor asks that Contractor be granted temporary approval to perform either a specific job or specified work types for a specified period of time for the Organization(s) indicated below and based on the reason(s) shown below.

**Contractor Name:** \_\_\_\_\_

**Tax/ISN ID:** \_\_\_\_\_

**Contractor Contact Person(s):** \_\_\_\_\_

**Phone Number:** \_\_\_\_\_

**Email Address:** \_\_\_\_\_

**MPC Requestor:** \_\_\_\_\_

**MPC Organization(s) making request:**

**Refining Wide**

Anacortes

Dickinson

Kenai

Salt Lake City

Canton

El Paso

Los Angeles

South Houston Green

Power

Catlettsburg

Gallup

Mandan

St. Paul Park

Cincinnati

Galveston Bay

Martinez

Other \_\_\_\_\_

Detroit

Garyville

Robinson

**TA Type:**     Project Specific     Contractor Specific     Emergency Response     No History (L6 Only)

**Scope of Work:** \_\_\_\_\_

**Begin Date:** \_\_\_\_\_      **End Date:** \_\_\_\_\_ (Review Table 1 in Section 3.6 of the Standard for TA Terms)

Criteria Not Met	New Request	1 <sup>st</sup> Renewal	2 <sup>nd</sup> Renewal	Additional Renewals
OSHA Willful Citation, Fatality related to services provided and PEC 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

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## **Appendix C: Contractor Temporary Approval Form (page 2)**

*Qualification Criteria Not Met:*

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> OSHA Incident Rate/TRIR | <input type="checkbox"/> Experience Modification Rate | <input type="checkbox"/> Fatality [date:]                               |
| <input type="checkbox"/> OSHA Willful Citation   | <input type="checkbox"/> Health & Safety Score/RAVs   | <input type="checkbox"/> Questionnaire                                  |
| <input type="checkbox"/> Citations               | <input type="checkbox"/> No History                   | <input type="checkbox"/> Not Evaluated by Contractor Evaluation Process |

*Description of disqualifying criteria:*

*Risk Mitigation Measures (the measures selected must apply to each project or job):*

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> JSA                              | <input type="checkbox"/> OSHA 10 or 30 Hour           | <input type="checkbox"/> BBS Inclusion    |
| <input type="checkbox"/> Safety On-Site                   | <input type="checkbox"/> Marathon Leadership Training | <input type="checkbox"/> Auditing Program |
| <input type="checkbox"/> Other Measures (describe below): |   |   |

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## Appendix C: Contractor Temporary Approval Form (page 3)

### MPC Corporate Refining Approval (Refining Wide)

I hereby approve the use of the above-referenced Contractor for execution of the work identified above at MPC locations within my area of responsibility.

**Organization:** Refining

**Director Refining Safety (signature):** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Director Refining Safety (please print name):** Fritz Kin

**Sr. VP of Eastern Refining (signature):** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Sr. VP of Eastern Refining (please print name):** Rich Hernandez

**Sr. VP of Western Refining (signature):** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Sr. VP of Western Refining (please print name):** \_\_\_\_\_

### MPC Approval – Organization #1

I hereby approve the use of the above-referenced Contractor for execution of the work identified above at MPC locations within my area of responsibility.

**Organization:** \_\_\_\_\_

**HES&S Manager (signature):** \_\_\_\_\_ **Date:** \_\_\_\_\_

**HES&S Manager (please print name):** \_\_\_\_\_

**Organizational Manager (signature):** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Organizational Manager (please print name):** \_\_\_\_\_

**Notes:**

- 1) Contractor, except for sub-contractors, must have executed the appropriate service contract and provided proof of required insurance coverage prior to commencement of on-site work.
- 2) Must be executed by Organizational Manager (Grade 16 or higher or designated Grade 15 Manager) of Organization granting approval, or a Manager who has been delegated temporary responsibility for the Organization during their absence.
- 3) Use additional pages for more signatures if necessary.
- 4) Forward completed form to your Supply Chain contact and send a copy to the Supervisor of Corporate Safety or L10 sites upload to ISN. The Contractor Database is to be updated by Supply Chain to reflect this exemption.

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## **Appendix C: Contractor Temporary Approval Form (page 4)**

### **Contractor Acceptance of Risk Mitigation Measures**

I hereby accept the Risk Mitigation Measures referenced above to be implemented at the assigned MPC locations referenced above.

**Contractor Company:** \_\_\_\_\_

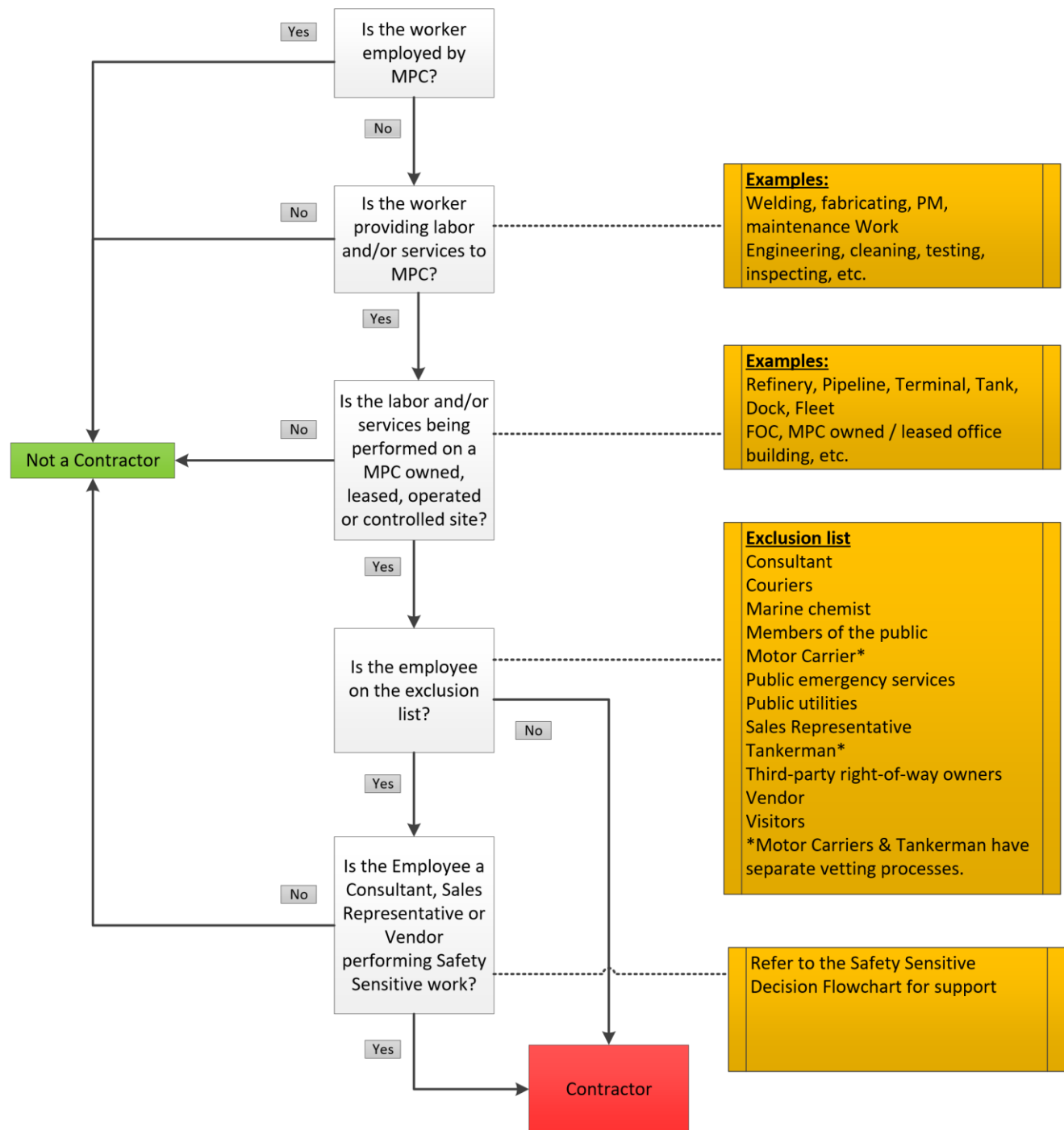
**Contractor Corporate Manager (signature):** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Contractor Corporate Manager (please print name):** \_\_\_\_\_

**Contractor Site Representative (signature):** \_\_\_\_\_ **Date:** \_\_\_\_\_

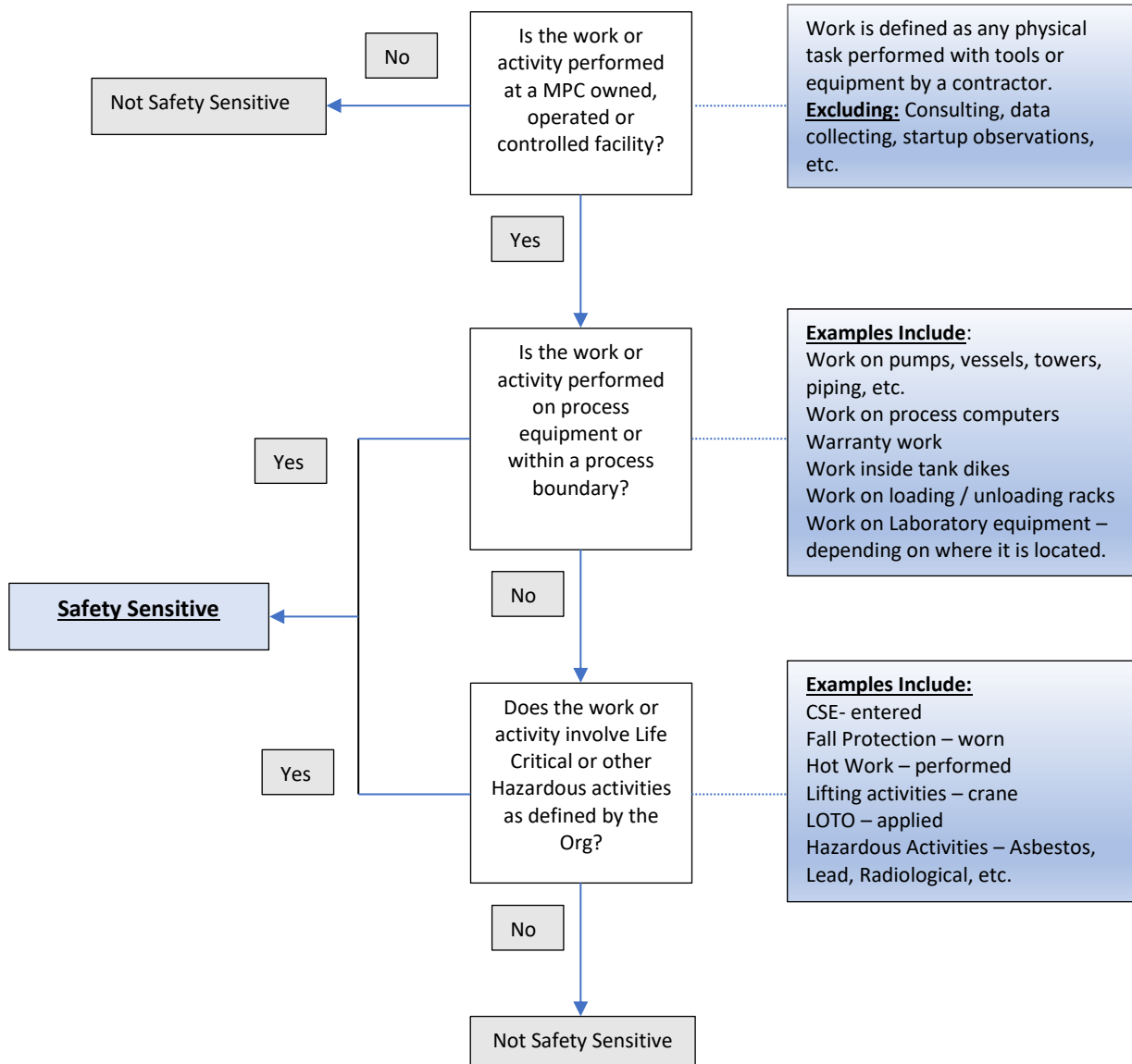
**Contractor Site Representative (please print name):** \_\_\_\_\_

## Appendix D: Contractor Decision Flowchart



## Appendix E: Safety Sensitive Decision Flowchart

### Safety Sensitive Decision Flowchart



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## Appendix F: Contractor Employee Onboarding Requirements and Variance Requests

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### CONTRACTOR ORIENTATION:

1. Site-specific safety orientation is required for ALL contractors performing work within the process areas at the refinery/KPL/Nikiski Terminal
2. Site-specific safety orientations are conducted online in either OSCA or ISN
  3. Orientation is scheduled by the contractor company in one of these two platforms. ISN Course code is “MPC Kenai Contractor Safety Orientation”
  4. OSCA Course code is 30MPCKO
  - 5. Safety Orientation Limitation**
- a. Site specific safety orientation must be renewed on an annual basis. This can be accomplished by completing training in OSCA or ISNworld.
- b. Contract employees working at the refinery are required to complete their site-specific orientation prior to it expiring.
- c. Absences greater than 30 days.
  - Contractor access badges become inactive when a contractor is out of the refinery for more than 30 days.
    1. When contractors return to work after a >30-day absence, the Security Guards will check their on-site safety orientation status for currency.
  - If the contractor returns within one year of their last site-specific safety orientation, they will be permitted to return to work with the approval of their work manager.
  - If the contractor returns after a 12-month absence of their last site-specific safety orientation, they must complete training prior to being allowed unescorted entry.
  - A Safety Variance Request Form can be requested from the Safety Department or Safety Supervisor in the event of an EMERGENCY or “Un-scheduled” visit/work until the contractor can take the online MPC Kenai Contractor Safety Orientation.

### HEALTH & SAFETY CARDS:

**Health & Safety cards must be current (within 1 year of date on card).**

1. ALL contractors coming on site must have a current H&S Card with the following exceptions:
  - a. A Variance Request Form can be requested from the Safety Department or Safety Supervisor for any individuals that do not go into the process areas
  - b. A Variance Request Form can be requested from the Safety Department or Safety Supervisor for any individual that has completed the on-site safety orientation training and is **always** escorted by a Marathon/Contract Employee.
2. Currently accepted H&S Training Cards:
  - a. Arctic Slope Safety – valid for 1 year
  - b. Basic Plus
  - c. CITS – valid for 1 year
  - d. C-Stop (online) – valid for 2 years
  - e. HAZWOPER / HAZMAT – valid for 1 year
  - f. North Slope Training Council (NSTC) – valid for 1 year
  - g. OSHA 10/30 – valid for 3 years
  - h. OSHA Hazwoper – valid for 1 year
  - i. Pacific Northwest Safety Training – valid for 3 years
  - j. Refinery Safety Overview RSO– valid for 3 years
  - k. Safety Council – valid for 3 years
  - l. Approved Company Specific Training – valid for 1 year
3. Training must be current based on the certifying organizations standard.



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**Exception: If the card explicitly states the certification is good for more than one year and it is within in the stated time frame, it will be accepted. Security Guards will extend badge access 1 week beyond card expiration date to allow for card renewal.**

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## Appendix F: Contractor Employee Onboarding Requirements and Variance Requests, continued.

**NOTE:** Other H&S cards may be accepted if they meet the Health & Safety Criteria as noted in *Appendix H* and approved by Marathon Safety.

### **FACIAL HAIR POLICY:**

1. All contractor employees who are in their company’s Respiratory Protection Program (RPP) and would be required to wear a respirator to work under a MPC Safe Work Permit, must keep facial hair maintained in a manner that complies with Marathon’s Facial Hair Graphic (see RSW-2005-KE, Respiratory Protection Program) and OSHA CFR 1910.134(g)(1)(i)(A)(B).
2. All contractors, vendors, consultants, visitors, etc. not in their company’s RPP or who will not be required or expected to wear a respirator in the performance of their duties at Kenai, will not be required to keep facial hair maintained in a manner that complies Marathon’s Facial Hair Graphic (see RSW-2005-KE, Respiratory Protection Program) and OSHA CFR 1910.134(g)(1)(i)(A)(B).

### **TWIC (Transportation Workers Identification Cards) Cards:**

1. All contractors coming onsite into KPL, KLNG and the tank farm at Nikiski are required to hold and have on their person a valid TWIC card unless escorted by an approved employee who has their own TWIC card and unescorted access (Security maintains list of Authorized Approvers).
  - a. Exceptions can only be approved by the Facility Security Officer or Security.

### **BADGES:**

1. NO contractor will be issued a badge if they do not meet ALL MPC’s Safety Requirements as listed above (Variances do not count).
  - a. Terminated contractor/employee badges should be turned into Security.
  - b. Contractors switching companies that have an active badge should notify Security so that their badge can reflect their active company.

Variance forms can be obtained from the Safety Department and should be filled out and approved **prior** to any contracting company or contractor coming on site.

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## Appendix G: Contractor On-Boarding Safety and Security Requirements

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**All contractors and sub-contractors must comply with the list below prior to starting work at the Kenai Refinery:**

### Safety Requirements

Contact MPC Safety Department with questions: [kensafetydept@marathonpetroleum.com](mailto:kensafetydept@marathonpetroleum.com) / 907-776-3562

- **ISNetworld - current membership** (Contact ISN @ [www.isn.com](http://www.isn.com))
    - Contractors Performing Safety Sensitive Services\* Must:
      - Maintain “Safety Status Met,” or “Safety Status Met – With Restrictions”
      - Contractors performing non-Safety Sensitive work are not obligated to maintain ISNetworld membership
- \*Safety Sensitive Services: “. . . Work that may affect personal & process safety including but not limited to:*
- *Work performed on process equipment or within a process area boundary;*
  - *Work that involves Life Critical Activities or other hazardous activities.*
  - *“Work” is defined as any physical task performed with tools or equipment by a contractor. “Work” does not include – Consulting, data collection, startup observations, etc.*
- **Site Specific Safety Orientation**
    - OSCA Orientation Course Code: 30MPCKO (an account with ASAP/OSCA is required for access to this training) – <https://www.tangandcompany.com/>
    - ISN Orientation Course Code: “MPC Kenai Contractor Safety Orientation” (ISN account required for access)
    - Send completed orientation information spreadsheet to the MPC Badging Officer at [Kenaiguardhouse@marathonpetroleum.com](mailto:Kenaiguardhouse@marathonpetroleum.com) at least 72 hours prior to on-site arrival **and** after OSCA Orientation has been completed (required information includes full name, date of birth, last 4 of SSN, Company, estimated on-site start date, etc.).
  - **General Industry Health and Safety – Up to date certification required**
    - We accept a variety of H&S cards – Arctic Slope Safety, Basic Plus, CITS, C-Stop, HAZWOPER / HAZMAT, North Slope Training Council (NSTC), OSHA 10 & 30 hour (General Industry or Construction), OSHA HAZWOPER, Pacific Northwest Safety Training, Refinery Safety Overview (RSO), Safety Council, and other general industry safety cards or specific company training may be approved through the MPC Safety Department upon request / review.
  - **Appropriate PPE**
    - Field personnel: Hard Hat, Hearing Protection, Safety Glasses w/ side shields, Goggles (on person), Fire Resistant Clothing (FRC – outer most layer), Steel or Safety-toed boots or shoes and a functional personal Hydrogen Sulfide (H<sub>2</sub>S) detector.

**Security Requirements.** Security Questions? [Kenaiguardhouse@marathonpetroleum.com](mailto:Kenaiguardhouse@marathonpetroleum.com) or contact the site’s Facility Security Officer at (907) 776- 4282

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- – **Passing Background Check within the last 24 months**
  - MPC has currently approved five background check vendors:
    - OSCA
    - DISA
    - Texas City Safety Council
    - First Advantage
    - S2Verify
  - If your company uses a background company other than one of the ones listed above, please contact the site’s Facility Security Officer at (907) 776-4282.
- **TWIC – Current Card** (Go to <https://www.tsa.gov/for-industry/twic>)
  - TWIC escorts are initiated and approved at the guardhouse by contractor MPC sponsor.

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## Appendix H: Contractor Health & Safety Training Program Requirements

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The basic health and safety records and the associated training programs of a contractor and/or contracting company must be verified before coming to work in the Refinery, KPL or Nikiski Terminal. This rule applies to all new construction work, maintenance work, repairs, turnaround jobs, major renovations, or specialty work performed on or adjacent to any PSM-covered process. (*Note: This requirement does not apply to contractors performing incidental services which do not influence process safety, such as janitorial work, food and drink services, laundry delivery, security or other supply/domestic services*).

All contracting company basic health and safety training programs must meet or exceed the following requirements in order to be approved by Marathon ES&S Department Manager.

### Safety Program Approval Requirements:

- 1. General Safety and Health Provisions (Title 29, Part 1926.20(b)(4)):** The employer shall permit only those employees qualified (one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience has successfully demonstrated his/her ability to solve or resolve problems relating to the subject matter, the work or the project).
- 2. Confined Space (Title 29, Part 1926.21(b)(6)(i)):** All employees who shall or could be required to enter into a confined or enclosed space shall be instructed as to the nature of the hazards involved, the necessary precautions to be taken, and in the use of protective and emergency equipment required. The employer shall comply with any specific regulations and/or associated work practices that apply to work in dangerous or potentially dangerous areas.
- 3. Hazard Communication (Title 29, Part 1910.1200):** Employers must provide employees with effective information and training on hazardous chemicals/materials in their work area at the time of their initial assignment and whenever a new physical or health hazard is introduced into their work area. The training must include the requirements of the Hazard Communication standard, the location and availability of the written hazard communication program and Safety Data Sheets (SDS), the hazards of chemicals/hazardous materials in the work area, measures employees can take to protect themselves from the hazards, and how to read and understand SDSs and warning labels.
- 4. Personal Protective Equipment (PPE) (Title 29, Part 1910.132):** Employers must provide training to each employee who is required to use PPE. Each employee must be trained to know at least the following: When PPE is necessary; What PPE is necessary; How to properly don, doff, adjust and wear PPE; The limitations of the PPE and the proper care, maintenance, useful life and disposal of the PPE. Each employee must demonstrate an understanding of the training and the ability to use PPE properly before being allowed to perform work requiring the use of PPE.
- 5. Hearing Protection (Title 29, Part 1910.95):** Employees shall be trained on a Hearing Conservation Program which includes the following required training. Training must be provided to employees who are or could be exposed at or above 86 decibel levels. The training must include the effects of noise on hearing; the purpose of hearing protectors; the advantages, disadvantages, and attenuation of various types of hearing protectors and instructions on the selection, fitting, use, and care of hearing protectors; the purpose of audiometric testing, and an explanation of the test procedures.
- 6. Lock out Tagout – Control of Hazardous Energy (Title 29, Part 1910.147):** Employees must receive training in the recognition of hazardous energy sources, the type and magnitude of the energy involved in the workplace, the methods and means necessary for energy isolation and control, and the limitations of tagging out equipment vs. locking it out. Employees must be instructed about the procedures and the prohibition relating to attempts to restart or reenergize machines or equipment which are locked out or tagged out.

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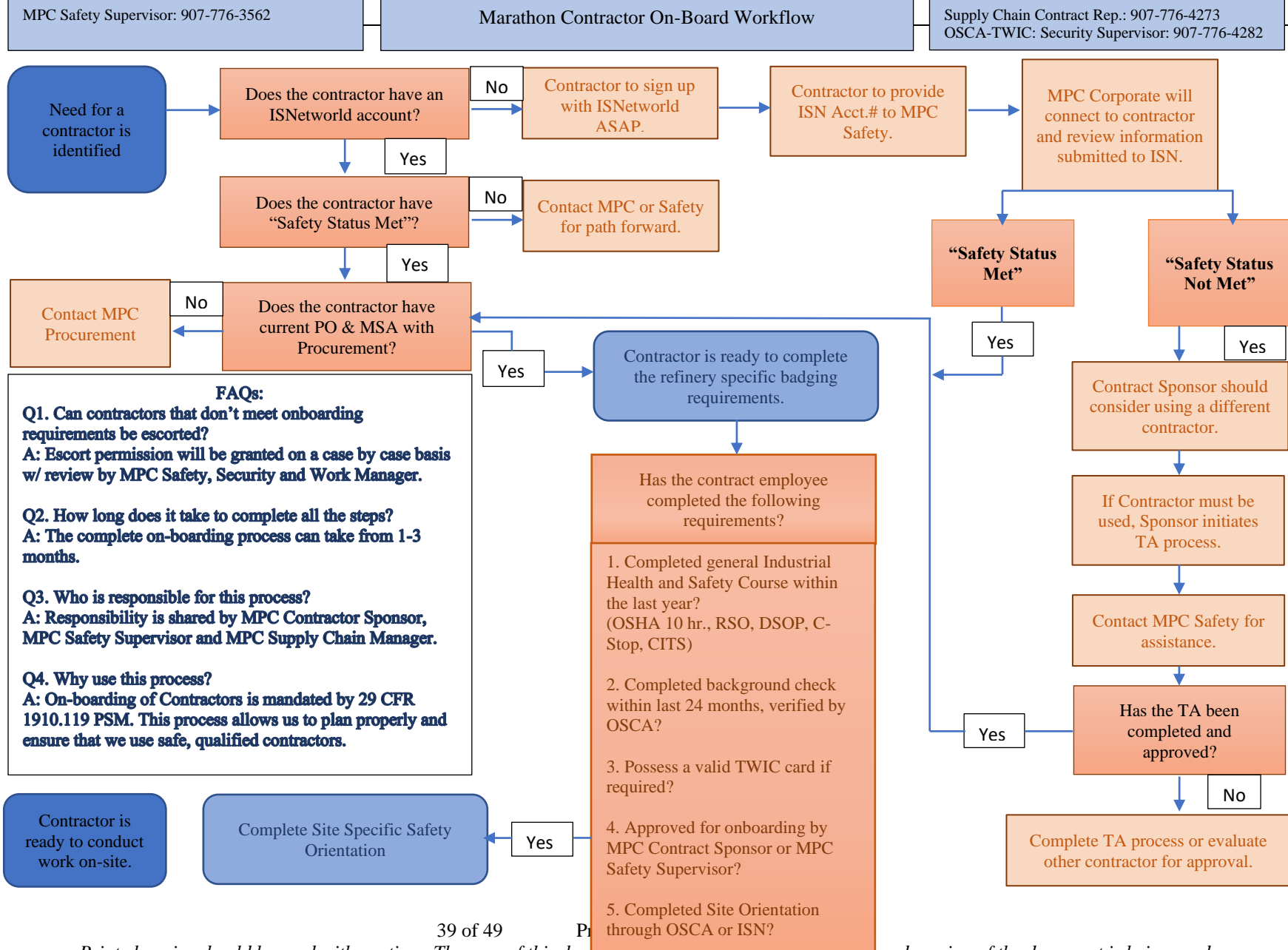
7. **Respiratory Protection (Title 29, Part 1910.134):** Training must ensure that each employee can demonstrate knowledge of at least the following:
  - a. Why the respirator is necessary and how improper fit, usage or maintenance can compromise the protective effect of the respirator.
  - b. What the limitations and capabilities of the respirator are.
  - c. How to use a respirator effectively in an emergency.
  - d. How to inspect, put on and remove, use and check the seals of the respirator.
  - e. What is the proper procedure for maintenance and storage of a respirator.
  - f. What is the proper procedure for maintenance and storage of a respirator.
  - g. The general requirements of the OSHA standard.
  
8. **Fall Protection (Title 29, Part 1926.503):** Training shall enable each employee to recognize the hazards of falling and the procedures to be followed in order to minimize these hazards. Training shall include the correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used. Training shall also include the use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used. The role of each employee in the safety monitoring system, the limitations on the use of mechanical equipment, the correct procedures for the handling and storage of equipment and materials and the erection of overhead protection shall also be covered in employee training.
  
9. **H<sub>2</sub>S Program (Title 29, Part 1910.1200(h)(3)):** Train and educate workers about hazards and controls. Training topics may include:
  - a. Characteristics, sources and health hazards of hydrogen sulfide.
  - b. Symptoms of hydrogen sulfide exposure.
  - c. Types of hydrogen sulfide detection methods and applicable exposure limits.
  - d. Workplace practices and procedures to protect against hydrogen sulfide exposure.
  - e. Emergency plans, locations of safety equipment, rescue techniques and first-aid.
  - f. Confined space procedures.

***The following Health and Safety programs/cards are accepted at the MPC Kenai Refinery with annual refresher training:***

- a. Arctic Slope Safety – valid for 1 year
- b. Basic Plus
- c. CITS – valid for 1 year
- d. C-Stop (online) – valid for 2 years
- e. HAZWOPER / HAZMAT – valid for 1 year
- f. North Slope Training Council (NSTC) – valid for 1 year
- g. OSHA 10/30 – valid for 3 years
- h. OSHA Hazwoper – valid for 1 year
- i. Pacific Northwest Safety Training – valid for 3 years
- j. Refinery Safety Overview RSO– valid for 3 years
- k. Safety Council – valid for 3 years
- l. Approved Company Specific Training – valid for 1 year

Additional Health and Safety Programs can be submitted to the MPC Kenai Refinery Safety Department for approval.

## Appendix I: Marathon Contractor On-boarding Workflow



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## Appendix J: Contractor Audit Scoring Tool

Table 1: Contractor Audit Type	Contractor Score	Table 2: Contractor Audit Scoring					
3 Year Full Program Audit and Annual Required Field Review	50+	Number of Facilities using the Contractor	Multiplier 1	Previous 3-year average spend	Multiplier 2	Risk of Work Scope	Multiplier 3
5 Year Full Program Audit and Annual Required Field Review	20-49	1-2	1	<\$5MM	1	Low Risk	1
Annual Field Review (Required)	11-19	3-4	2	\$5MM - \$15MM	2	Medium Risk	3
		5-7	3	\$15MM - \$30MM	3	High Risk	20
Annual Field Review as necessary (Not Required)	1-10	7-10	4	\$30MM - \$75MM	4		
		>10	5	>\$75MM	5		

Table 3 Hazard/Risk Factors	Hazard/Risk Factors																															
	Janitorial	Medical Clinic	Chemical Supplier	Security	Field Consultants	Grounds Maintenance	Safety Services (HW/FW)	Safety Equipment Service	HVAC Service	Fugitive Emission Monitoring	Heat Treating	Crane (Heavy Haul)	Heavy Equipment Operator (forklift/backhoe/etc.)	Insulation/Asbestos	Radiography/Inspection	Vac Truck/Hydroblast	Heater Pigging	Tank Cleaning	Contractor Operations (MPC Equipment)	Painters	Specialty Clamp/Isolation	Tank Construction/Maint.	Specialty Welding/ Weld Overlay	Electrical	Catalyst Change	Scaffolding	General Maintenance	Demolition	General Construction	TAR General Construction		
Transient			X			X	X		X		X	X	X				X						X					X			X	
Work Congestion/SIMOPs							X				X	X	X				X			X			X		X	X			X	X		
Work at heights					X		X	X	X	X	X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
Respirator usage									X					X		X		X	X	X	X	X	X	X	X	X	X	X	X	X		
Ergonomic demand		X		X				X		X				X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X		
Hot Work (open flame)								X			X									X			X	X	X	X	X	X	X	X		
Work in Process Unit				X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
Line Breaking									X							X		X				X	X			X	X	X	X	X		
Electrical > 50V								X				X												X								
Confined Space Entry											X			X	X	X	X	X		X			X	X	X	X	X	X	X	X		
Excavations													X		X									X		X		X	X	X		
Heavy Tool Work						X						X					X					X	X	X			X	X	X	X		
High Pressure Equipment work								X								X	X		X	X												
Heavy Mobile Equipment						X						X	X			X		X		X	X	X	X	X	X	X	X	X	X	X		
Radiography															X																	
Work over water									X					X	X					X		X		X		X	X	X	X	X		
Cranes and Rigging												X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X		
	0	1	1	2	2	3	4	4	5	6	6	7	7	7	7	7	8	8	8	8	8	9	10	10	10	10	11	11	11	13	13	14
	Low Risk 1-5									Moderate Risk 6-9									High Risk >10													



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## Appendix K: MPC/Contractor Field Audit Scoring Tool

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The QR code below will take you to the Field Audit Scoring Tool (FAST).

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## Appendix L: MPC Kenai Work Code Matrix

### MPC Kenai Work Code Matrix

This document allows the MPC Contractor Sponsor, Project Manager, PIC, etc. to determine well ahead of the work start date, if ISNetworld compliance is required based on work type performed. They can then alert their prospective contractors of the requirement for ISN compliance in advance to avoid schedule disruption.

This document categorizes work activities as “Safety Sensitive” and “Non-Safety Sensitive.” Contractors desiring to perform Safety Sensitive work, as defined below, at the Kenai Refinery, KPL, KLNG or the Nikiski Terminal, must hold a current ISNetworld account and maintain “Safety Status Met” or “Safety Status Met w/ Restrictions” rating.

**NOTE:** Some work types may switch categories based on the location of or methods necessary to conduct the work. Non-safety sensitive tasks may become safety sensitive work when Life Critical Safety work methods are necessary to complete the work.

Non-safety sensitive tasks require local safety oversight. Examples: Safe Work Permitting, JSA, JJSV, Pre-job Safety meeting, etc.

Contractors providing a proposal are encouraged to include their ISNetworld rating at the time the proposal is made. The MPC Contractor Sponsor, Project Manager or Requisitioner must complete a Temporary Approval form to use Contractors performing Safety Sensitive work that do not hold a "Safety Status Met," or “Safety Status Met w/ Restrictions” rating. For assistance contact the Kenai Safety Supervisor.

#	WorkType	Non-Safety Sensitive ISN Not Req'd	Safety Sensitive ISN Req'd
<b>1</b>	<b>Administrative Personnel Recruiting and Staffing</b>		
1.1	No field activities	X	
1.2	With field activities		X
<b>2</b>	<b>Aerial Services</b>		X
<b>3</b>	<b>Aircraft Services (external, performed at height)</b>		X
<b>4</b>	<b>Boiler Systems - Installation / Maintenance / Repair</b>		X
<b>5</b>	<b>Business recovery services i.e. mobile workspace</b>	X	
<b>6</b>	<b>Canopies/Awnings - Installation / Maintenance / Repair</b>		X
<b>7</b>	<b>Catering / Food Services</b>	X	
<b>8</b>	<b>Cathodic Protection - Installation / Maintenance / Repair</b>		X
<b>9</b>	<b>Civil Work</b>		
9.1	Asphalt Removal/Paving		X
9.2	Boring		X
9.3	Pre-mix Concrete Delivery	X	
9.4	Concrete Pouring/Pumping	X	
9.5	Ditching/Dirt Work (not below original grade, hand shoveling)	X	
9.6	Excavation/Trenching		X
9.7	Vacuum Excavation		X
9.8	Underground Sewer Work		X
<b>10</b>	<b>Compressors</b>		
10.1	Installation Maintenance / Repair/ Overhaul		X
10.2	Troubleshooting without tools (testing tools/meters) SS if exposure to hazardous energy potential	X	
10.3	Troubleshooting with tools		X
<b>11</b>	<b>Construction Management Services</b>		X
<b>12</b>	<b>Consulting, Non-technical/non-engineering</b>		
12.1	Use of tools		X

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#	Work Type	Non-Safety Sensitive ISN Not Req'd	Safety Sensitive ISN Req'd
12.2	No use of tools	X	
<b>13</b>	<b>Contractor Operations of Marathon Facilities</b>		<b>X</b>
<b>14</b>	<b>Conveyor System - Installation / Maintenance / Repair</b>		<b>X</b>
<b>15</b>	<b>Crane Operations/Rigging Services</b>		<b>X</b>
15.1	Inspection without tools	X	
<b>16</b>	<b>Crane &amp; Hoist Service</b>		<b>X</b>
16.1	Inspection without tools	X	
<b>17</b>	<b>Demolition and Salvage</b>		<b>X</b>
<b>18</b>	<b>Diving</b>		<b>X</b>
<b>19</b>	<b>Door (Overhead) - Installation / Maintenance / Repair</b>		<b>X</b>
<b>20</b>	<b>Dredging</b>		<b>X</b>
<b>21</b>	<b>Electrical and Instrumentation Installation/Repair/Troubleshooting</b>		<b>X</b>
21.1	Arc Flash Survey (On-Site, conducted with or without opening electrical equipment)		<b>X</b>
21.2	Electrical Troubleshooting (Energized or De-Energized)		<b>X</b>
21.3	Energized Electrical Equipment Cleaning		<b>X</b>
21.4	Conduit and Lighting Installation / Repair		<b>X</b>
21.5	Machine Wiring		<b>X</b>
21.6	Overhead Utility Services		<b>X</b>
21.7	Plant Wiring (Any Voltage)		<b>X</b>
21.8	Thermal Imaging (NSS if no Life Critical Safety work method involved)		<b>X</b>
21.9	Underground Utility Services - Instrumentation inspection, repair, replacement		<b>X</b>
<b>22</b>	<b>Engineering Services</b>		
22.1	On-Site Services with use of tools		<b>X</b>
22.2	On-Site Services no use of tools (process areas or logistics work areas)		<b>X</b>
22.3	On-Site Services no use of tools - Escorted (process areas or logistics work areas)	X	
22.4	On-Site Services no use of tools (non-process areas or non-logistics work areas)	X	
<b>23</b>	<b>Environmental</b>		<b>X</b>
23.1	Asbestos or Lead Abatement		<b>X</b>
23.2	Degassing and Vapor Control		<b>X</b>
23.3	Emissions Testing		<b>X</b>
23.4	Explosives		<b>X</b>
23.5	Geotechnical Services		<b>X</b>
23.6	Remediation		<b>X</b>
23.7	Site Assessment (Phase II or greater)		<b>X</b>
23.8	Spill Cleanup (Hazardous or Non-Hazardous Materials)		<b>X</b>
23.9	On-site Management of Waste		<b>X</b>
<b>24</b>	<b>Erosion Control</b>		<b>X</b>
24.1	Rip Rap Installation		<b>X</b>
24.2	Seeding, rocking and berm maintenance, silt fence		<b>X</b>
<b>25</b>	<b>Exchangers</b>		<b>X</b>
25.1	Bundle Extraction/Corrosion Control / Electrochemical Cleaning		<b>X</b>
25.2	Industrial Steel Cutting / Installations / Linings and Coatings		<b>X</b>
25.3	Troubleshooting (On-Site) (NSS if no Life Critical Safety work method involved) ex: Consulting/Hands-off		<b>X</b>
25.4	Tube Repairs		<b>X</b>
<b>26</b>	<b>Fence - Installation / Maintenance / Repair</b>	X	
<b>27</b>	<b>Film Crew</b>	X	
<b>28</b>	<b>Fire Protection Systems and Equipment</b>		
28.1	Inspection	X	

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28.2	Installation / Maintenance / Repair		X
<b>29</b>	<b>Fireproofing</b>		X
<b>30</b>	<b>Flare - Installation / Maintenance / Repair</b>		X
<b>31</b>	<b>Generators (Portable and Fixed)</b>		
31.1	On-Site Maintenance / Repair		X
31.2	Off-Site Maintenance / Repair	X	
<b>32</b>	<b>Heavy Equipment (e.g. Fire Apparatus, Dozers, Track hoes, Backhoes)</b>		
32.1	On-Site Maintenance / Repair		X
32.2	Off-Site Maintenance / Repair	X	
<b>33</b>	<b>Hot Tap</b>		X
<b>34</b>	<b>HVAC</b>		
34.1	System installation and maintenance		X
34.2	Diagnostics, testing, sampling and survey	X	
<b>35</b>	<b>Hydro blast</b>		X
<b>36</b>	<b>Hydrostatic Testing</b>		X
<b>37</b>	<b>Inspection Services - Non-destructive testing (e.g. Ultrasonic, X-ray, Mag Particle)</b>		
37.1	Hands on		X
37.2	No hands-on	X	
<b>38</b>	<b>IT System Work</b>		
38.1	Computer	X	
38.2	Install or maintenance of lines/equipment (use of hand/powered tools or work at elevation >4 ft.)		X
<b>39</b>	<b>Janitorial Services</b>	X	
<b>40</b>	<b>Laboratory Services</b>		
40.1	On-Site Services – Safe Work Permit necessary		X
40.2	On-site services – IT equipment calibration/repair/minor hand tool use	X	
40.3	Off-Site Services/Sample pick-up by outside lab	X	
<b>41</b>	<b>Wild/Domestic Animal Removal</b>	X	
<b>42</b>	<b>Line Locating</b>	X	
<b>43</b>	<b>Liquid Product Transfers (not related to truck or rail transportation)</b>		X
<b>44</b>	<b>Machine Shop work on-site</b>		X
<b>45</b>	<b>Marine Services</b>		X
<b>46</b>	<b>Meters</b>		X
46.1	Maintenance/Repair - Online Pressurized or Offline Depressurized		X
46.2	Proving/Calibration		X
<b>47</b>	<b>Mowing and Ground Care / Maintenance</b>		
47.1	Landscaping, not involving Excavation activities (SS if Life Critical Safety method necessary)	X	
47.2	Irrigation Systems (Installation and Repair) if in Process Area		X
47.3	Mowing	X	
47.4	Tree Trimming/Clearing and Wood Grinding (e.g., large limbs with chain saw)	X	
47.5	Weed Control (process areas or logistics work areas)	X	
47.6	Weed Control (non-process areas or logistics non-work areas)	X	
<b>48</b>	<b>Municipal Waste</b>	X	
<b>49</b>	<b>Office Building</b>		
49.1	Elevator inspection/installation/repair		X
49.2	Elevator inspection		X
49.3	Carpentry- Finishing		X
49.4	Epoxy and Another Polymer Flooring	X	

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49.5	Floor Covering	X	
49.6	Interior Design	X	
49.7	Furniture installation	X	
49.8	Plumbing - Maintenance	X	
49.9	Working at Elevated Areas		X
<b>50</b>	<b>Oil Spill Response Organization (OSRO)</b>	X	
<b>51</b>	<b>Painting / Coating</b>		X
51.1	Sandblasting		X
51.2	Working at elevated locations		X
51.3	Working at Non-elevated locations		X
<b>52</b>	<b>Personnel Transportation onsite</b>	X	
<b>53</b>	<b>Pest Control</b>	X	
<b>54</b>	<b>Piling - Installation / Repair / Maintenance</b>		X
<b>55</b>	<b>Plumbing Construction/Industrial</b>		X
<b>56</b>	<b>Postal (e.g. FedEx, UPS, DHL, USPS, etc. &lt;150 lbs.)</b>	X	
<b>57</b>	<b>Powered Industrial Trucks - Maintenance / Repair</b>		
57.1	On Site Maintenance / Repairs		X
57.2	Off Site Maintenance / Repair	X	
<b>58</b>	<b>Project Management onsite</b>		
58.1	Administrative (e.g. project controls, planning)	X	
58.2	Management of construction or maintenance work activities		X
<b>59</b>	<b>Railroad Services</b>		
59.1	Class I railroads performing common carrier/transportation functions	X	
59.2	Industry owned track repair/maintenance & construction services		X
59.3	Locomotive - Inspection, Maintenance / Repair		X
59.4	Movement and Spotting Activities		X
59.5	Railcar Inspection, Maintenance & Repair		X
59.6	Contracted Switching Operations (other than Class I railroad)		X
59.7	Railcar Leasing Services	X	
<b>60</b>	<b>Refrigeration Equipment Repair and Maintenance</b>	X	
<b>61</b>	<b>Road Dust Control</b>	X	
<b>62</b>	<b>Roofing</b>		X
<b>63</b>	<b>Safety &amp; Health Services / Staffing</b>		
63.1	Confined Space Entry / Rescue / Fire Watch		X
63.2	Ergonomic Assessments (Industrial)		X
63.3	Ergonomic Assessments and installations (Office)	X	
63.4	Industrial Hygiene Monitoring (Onsite)		X
63.5	Industrial Hygiene Services (Off-Site)	X	
63.6	Safety Supervisor/coordinator		X
<b>64</b>	<b>Scaffolding (Installation / Erection / Inspection / Disassembly)</b>		X
<b>65</b>	<b>Scales</b>		
65.1	Installation and construction		X
65.2	Weighing and Instrument Repairs and Calibration	X	
<b>66</b>	<b>Security</b>		
66.1	Security System Installations		X
66.2	Traffic Control/Gate Guarding at or outside of the fence line.	X	

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66.3	Traffic Control/Gate Guarding and other related activities which require access into the property. (E.g., foot and vehicle patrols, use of canines.)		X
<b>67</b>	<b>Septic System (Fixed or Portable)</b>		
67.1	Installation/Maintenance/Repair		X
67.2	Septic System Waste Pick-up	X	
<b>68</b>	<b>Signs</b>		
68.1	Installation/Maintenance/Repair		X
68.2	Installation/Maintenance/Repair hand tools only at grade, No Life Critical Safety methods necessary	X	
<b>69</b>	<b>Snow Plowing/Removal</b>	X	
<b>70</b>	<b>Software developers</b>	X	
<b>71</b>	<b>Solar Panel</b>		
71.1	Installation/Maintenance/Repair	X	
<b>72</b>	<b>Steel Erection and Assembly</b>		X
<b>73</b>	<b>Structural Repair</b>		X
<b>74</b>	<b>Surveying (Boundary / Leak Surveying / Topographic)</b>		X
<b>75</b>	<b>Tanks</b>		
75.1	Cleaning (External Work or Internal Work)		X
75.2	Construction		X
75.3	Gauging		X
75.4	Linings and Coatings (External Work or Internal Work)		X
75.5	Maintenance / Repair (External Work or Internal Work)		X
75.6	Sampling / Strapping		X
75.7	Underground Storage Tank Removal		X
<b>76</b>	<b>Tire Repair</b>		
76.1	On-site light duty vehicle	X	
76.2	On-Site heavy equipment		X
<b>77</b>	<b>Towers/Vessels</b>		X
77.1	Towers - Communications - Construction/Repair		X
77.2	Towers - Communications - Antenna Installation/Inspection		X
77.3	Vessel Construction/Repair/Maintenance		X
<b>78</b>	<b>Traffic Control</b>	X	
<b>79</b>	<b>Training content development and delivery</b>	X	
<b>80</b>	<b>Trucking/Transportation Services</b>		
80.1	Pick-up and Delivery Driver	X	
80.2	General Freight (>150 lbs. - LTL, TL, Flatbeds)	X	
80.3	Oversized/Heavy Materials	X	
80.4	Dry bulk/Pet Coke	X	
80.5	Finished motor, jet, & diesel fuels	X	
80.6	Refined petroleum products	X	
80.7	Crude oil transport	X	
80.8	Chemicals requiring driver connections		X
80.9	Waste – Non-Hazardous (general office trash/municipal waste)	X	
80.10	Waste – Hazardous		X
80.11	Waste - Other DOT or specially regulated waste (includes asbestos, universal waste, etc.)		X
80.12	Vacuum Truck Services		X
80.13	Hauling - Water Trucks/Hauling	X	
80.14	Fresh Water Hauling	X	

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80.15	Delivery/pick-up only (no hook-up) of portable tanks and roll-off bins	X	
<b>81</b>	<b>Valve Repair / Installation / Maintenance</b>		
81.1	In-Service / In-Line / Out of Service		X
81.2	Maintenance Online (Pressurized or Depressurized)		X
<b>82</b>	<b>Vendors (Water, vending machine, Fastenal, Grainger, etc.)</b>	X	
<b>83</b>	<b>Welding</b>		X
83.1	On In-Service / In-Line / Near Flammable Materials		X
83.2	Shop Fabrication / Fabrication Areas (Safe Areas)		X
<b>84</b>	<b>Well Drilling Services</b>		X
84.1	Casing Running		X
84.2	Cementing		X
84.3	Drilling Fluids		X
84.4	General Hauling		X
84.5	Reverse Units		X
84.6	Roustabout Services		X
84.7	Water Well Services- Hauling/Drilling		X
84.8	Workover/Drilling Rig		X
84.9	Flow line repairs (Steel above ground), well head tie ins, insulation (no digging or hot work)		X

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## Appendix M: Fatality Review Questions

### For Contractor Safety Management Team Use Only

#### Purpose

When the Contractor Safety Management Team is reviewing if a fatality should require a Temporary Approval or not the following questions and scenarios should be reviewed.

<u>If the fatality occurred...</u>	<u>Then...</u>
While driving to a job site.	If the Contractors business (work provided to MPC) is driving for MPC then, Yes TA required.  If the Contractors business (work provided to MPC) isn't driving for MPC then, No TA required.
To an employee not involved in the work which causes the accident (e.g., explosion at a plant and fatally injures an employee in a nearby unit performing non-associated work).  Unless Hazard Recognition would have protected the employee (e.g., not following proper evacuation process and continued to gather tools before leaving).	No TA required.  Then, Yes TA required
To an employee walking through a facility (e.g., employee walking on a catwalk, it collapses, the employee falls and is fatally injured).  Unless Hazard Recognition would have protected the employee (e.g., walking under barricade tape into work area and something drops onto the employee).	No TA required.  Then, Yes TA required
To an employee involved in the work which causes the accident (e.g., setting up or assisting with the setup of a crane).	Yes, TA required.
Because of a personal medical condition.	No TA required as long as the work didn't in any way contribute to the fatality.
To a Contract company having different Divisions/Sub Companies with different tax ID numbers.	No TA required to the entire Contract company. The TA is only required to the Contractors associated tax ID number that shows the fatality.
To a company that doesn't meet the criteria of being a contractor (e.g., Airgas).	No TA required, Airgas is a Supplier not a Contractor.



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## Revision History

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**Document** Complete the following table for each document revision.  
**Revision History**

Revision Number	Description of Change	Author of Revision	Approved By	Revision Date	Approval Date
0	Replaces WP-79 Contractor Safety Management	John Averill		10/30/2020	
1	Updated to align with RSP-1306. Added definitions, Contractor Audit update, Audit form replaced with FAST. Contractor Scoring tool added. TWIC & Training sections updated. Updated Facial Hair Policy	Michelle Stewart	Michelle Lee	9/27/23	9/27/23

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