

## 1.0 Purpose

The purpose of this document is to define the minimum general health, environment, safety and security (HES) requirements for Contractors working at the Sunoco LP Midstream Operations facilities (Sunoco). The requirements of this document apply to all Contractors, Sub-Contractors, and third party workers performing on-site work for/at Sunoco.

This document serves as an overview of minimum requirements. In addition to the requirements outlined in this document, all contractors will be required to understand and follow any or all applicable Sunoco Safety Standards, other facility-specific requirements, and regulatory requirements.

## 2.0 Definitions

**Contractor Company (hereinafter “Contractor”)** – A company who conducts work on-site at a Sunoco LP site under a contract with Sunoco LP. These companies are also called Contract Service Provider, Designated Contractor, Suppliers, or Vendors.

**Goods Supplier** – A company who provides or delivers goods to a Sunoco LP location. Goods suppliers may or may not perform work on-site.

**Third Party Companies/Workers** – Any outside company working on-site at a Sunoco LP site that is not contracted to perform work for Sunoco LP. Third party companies may work on their own equipment, but their equipment may be tied into Sunoco LP equipment. Examples of some Third Party Workers are: utility company workers, railroad workers, contractors for these companies, Energy Transfer employees, Sunoco Pipeline employees, pipeline inspectors, ship personnel, and government agency workers.

**PSM-covered Contractor** -- Contractor performing maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. It does not apply to contractors providing incidental services which do not influence process safety.

**Incidental Services Contractor** – Contractor performing work which do not influence process safety, such as janitorial work, food and drink services, laundry, delivery or other supply services.

### **Acronyms and References:**

- **ACM** - Asbestos Containing Material
- **BC** – Classes of Fire Extinguishers
  - **Class B**: Used to fight fires involving flammable liquids or gases.
  - **Class C**: Used to fight fires involving energized electrical equipment.
- **CFR** – Code of Federal Regulations
- **DEP** – Department of Environmental Protection
- **DOT** – Department of Transportation
- **EMR** – Experience Modification Rate
- **EPA** – Environmental Protection Agency
- **EPS** – Electronic Permit System
- **ET or ETP** – Energy Transfer or Energy Transfer Partners
- **HESP** – Health, Environmental, and Safety Plan

- **HAZCOM** – Hazard Communication
- **HAZWOPER** - Hazardous Waste Operations and Emergency Response
- **H&S** – Health and Safety
- **JHA** – Job Hazard Analysis
- **JSA** – Job Safety Analysis
- **MHIC** – Marcus Hook Industrial Complex
- **NFPA** – National Fire Protection Association
- **OSHA** - Occupational Safety and Health Administration
- **PACM** - Potentially Asbestos Containing Material
- **PELs** - Permissible Exposure Limits
- **PPE** - Personal Protective Equipment
- **PSM** – Process Safety Management
- **SDS** – Safety Data Sheet
- **VTO** – Vacuum Truck Operator

### 3.0 General Requirements

- Sunoco strives, at all times, to maintain a safe and healthy workplace for our employees, Contractors, and the communities in which we operate. The Company relies on all parties to maintain a healthy and safe work environment to help achieve this goal.
- Sunoco expects that each Contractor and the employees of said companies will perform their individual duties in a manner that is not injurious or otherwise dangerous to themselves or others. Each Contractor and by default, Contractor personnel, Subcontractors and their personnel are solely responsible for their own safety. It is each person's responsibility to report at-risk behaviors and/or conditions as they are encountered and to effect immediate remediation of the problem in order to prevent adverse impact to property and/or personnel.
- PSM-covered Contractors and other high-risk Contractors performing on-site service work at a Sunoco site will be prequalified from an HES perspective by evaluating safety performance and programs.
- A Health and Safety Plan (HASP) may be required to be created, submitted, and approved for certain projects at Sunoco.
- Contractors will be periodically audited and will periodically have their performance reviewed.
- Contractors who have poor safety performance may need an improvement plan, may be suspended, or may be prohibited from continuing to work at Sunoco LP sites.
- Contractors must be aware of and maintain compliance with all Sunoco HES requirements and all regulatory requirements including but not limited to:
  - 29 CFR 1926 Construction Safety Standards
  - 29 CFR 1910 General Industry Safety Standards
  - 29 CFR 1910.119/1926.64 Process Safety Management of Highly Hazardous Chemicals
  - 29 CFR 1910.120 / 1926.65 Hazardous Waste Operations and Emergency Response
  - 40 CFR Protection of the Environment
  - 49 CFR Transportation (DOT, PHMSA, FMCSA, USCG, FRA)
- Contractors utilizing subcontractors and other 3rd party services must have a subcontractor management process developed and implemented prior to their initial use.
- Contractors must review their Sub-Contractor's HES programs and performance data when selecting a Sub-Contractor. Contractors must ensure Sub-Contractors are acceptable to work on-site and meet Sunoco's Reference Points or have adequate explanations/responses to any issues. Sunoco's Reference Points for pre-qualification are:
  - No Fatalities in 3 prior years
  - Current EMR of 1.05 or less

- Three-year average Total Recordable Incident Rate equal to or less than 1.25 times Industry Average TRIR for the primary work type (based on most recent BLS data).
  - No Regulatory Citations (safety, environmental, DOT, etc.) in 3 prior years that are categorized as Serious, Willful, Repeat, or NOV.
  - Adequate HES standards/procedures/programs for the work to be performed.
- Contractors are responsible to ensure that Sub-Contractors they are using on-site are aware of and meet or exceed all Sunoco and regulatory.
- Contractors must maintain a clean and safe workplace at all times while performing work at Sunoco sites.
- Smoking is permitted in designated areas only.
- The following are prohibited at all Sunoco sites:
  - All weapons (firearms, knives, ammunition, etc.)
  - Alcoholic beverages
  - Illegal drugs
  - Drug paraphernalia
  - Prescription drugs without proper reporting to supervisor
  - Fireworks and explosives
  - Harassment
- Employee involvement is essential to the reduction of incidents and accidents and the promotion of an effective safety culture. To enhance employee safety on construction sites, personnel must be able to anticipate and recognize hazards associated with the designated work. Safety toolbox or tailgate meetings as well as participation in the JSA process provide the interaction opportunity necessary to heighten employee awareness and provide a platform for personnel to ask questions and clarify statements.
- English is the official language for all modes of communication at all Sunoco worksites. If Contractors and/or Subcontractors employ individuals that cannot or have a limited ability to read, write and/or comprehend the English language, said entity shall ensure that all safety and health related data is presented to each affected individual in their native language. This requirement applies but is not limited to the Contractors and Subcontractors basic and site specific safety plans, orientation documents, safety forms, work permits, and Safety Data Sheets.

#### 4.0 Responsibilities

**Contractor Company Supervision / Management Representative** – Responsible to assure that Contractor employees (and Sub-Contractor employees) are trained and qualified to perform the work contracted, that they do so in a safe and environmentally-responsible manner, and that they do so in compliance with all Sunoco and all regulatory requirements.

**Sunoco Health and Safety Specialist (Sunoco H&S)** – Responsible for the HES pre-qualification process for Contractors, auditing, reviewing H&S data, and participating in periodic contractor safety meetings.

**Sunoco Contact / Contract Administrator** – Provides day-to-day oversight of the Contractor's activities, conducts periodic jobsite visits, and conducts informal audits.

#### 5.0 Procedure

##### 5.1 Contractor Evaluation and Selection

- All PSM-covered Contractors performing on-site service work at Sunoco sites will be evaluated and prequalified from an HES perspective prior to conducting work. Sunoco can use the following systems or processes to conduct evaluation: Veriforce, SAP/Aptus, Sunoco LP Marketplace, Avetta (PICS), and paper PQF. The review includes the following areas:
  - Injury and illness data

- Experience Modification Rate (EMR)
- Regulatory citation review
- HES standards/procedures
- Contractor performance will be evaluated periodically through periodic prequalification updates, job-site and post-job audits, etc. Contractors whose H&S performance is unsatisfactory may be excluded from performing future work for Sunoco.
- *Exceptions to any requirements of section 5.1 must be approved by the Sunoco Facility Manager.*

## **5.2 Incident Reporting and Injury Treatment**

- All incidents and injuries requiring emergency action must be immediately reported.
- For all other injuries, it is the Contractor's responsibility to ensure its company's injury treatment policy is followed. The Contractor needs to ensure their employee gets the necessary medical treatment.
- The Contractor must immediately report any emergency and all other non-emergency incidents (fire, spill, potential exposure to hazardous substances, release, property damage, trespassing, near miss, etc.) to its Sunoco Contact and Permit Issuer.
- The Contractors are allowed to have their personnel administer First Aid treatment as long as they are properly trained in First Aid and associated topics (i.e. Bloodborne Pathogens, Hepatitis B vaccination offering).
- Appropriate and adequate First Aid Supplies must be kept on-site, including eyewash kits where required.
- The Contractor must complete and submit a Contractor Injury and Illness Reporting Form (Appendix A) to its Sunoco contact within 48 hours of the injury or illness occurring (unless more time is warranted, requested, and granted).
- The Contractor must provide updates on injuries, illnesses, incidents, and near misses to its Sunoco contact when requested.
- The Contractor must provide the OSHA injury or illness classification and any changes to its Sunoco contact.
- Incident investigations will be required for certain events. The Contractor must determine if an incident investigation is required through a discussion with its Sunoco contact. Sunoco personnel reserve the right to conduct their own investigation.

## **5.3 Facility Access Requirements**

- 5.3.1 Contractors must have Sunoco's permission to come onsite. Some sites have background check, substance abuse screening, facility badging, and computer-based training and testing requirements.
- 5.3.2 All Contractors who intend to work on site must receive an HES Orientation. This can be done in various formats, such as, computer-based, classroom, and one-on-one.
- 5.3.3 *Exemptions to any of the above requirements requires the approval of the Sunoco Facility Manager.*

## **5.4 "Tool Box" or "Tailgate" Meetings**

- Contractors must meet with their employees to:
  - Review current HES topics of interest
  - Review the Lessons Learned or Safety Flashes from events
  - Perform necessary training refreshers or updates
  - Review emergency action plans (alarms, evacuation routes, etc.)
  - Communicate any new or changing HES requirements
- This can be done in a formal training meeting or as a part of the JSA Card process.
- The Sunoco Contact and H&S personnel may attend these periodically.

## **5.5 Contractor Supervisory, Management, and HES Staff**

- Each Contractor must have a supervisory and/or management person that understands Sunoco HES requirements and the applicable regulatory requirements.
- Certain Contractors must appoint an on-site representative who will be responsible for coordinating and completing HES requirements. These requirements include (but are not limited to): leading HES meetings, conducting audits and inspections, ensuring personnel are following H&S standards and policies, ensuring personnel are wearing necessary PPE, communication of incidents, resolving H&S issues, conducting investigations, etc.
- Based on work scope, risk level of the work, or past performance, some Contractors may be required to maintain a full-time, on-site HES professional.

## **5.6 Health, Environment, and Safety Plan (HESP)**

- Certain Contractors will be required to complete a Site or Project HESP.
- THE HESP will need to be reviewed and approved by the Sunoco Contact and Sunoco H&S Specialist.
- Contractors working on sites covered by the HAZWOPER (29 CFR 1910.120) standard, must create a Health Environmental and Safety Plan consistent with the OSHA HAZWOPER requirements.
- Other Contractors that are performing construction, demolition, or environmental remediation activities may be required to create and maintain a project or site-specific HESP. The HESP must meet governmental requirements, Sunoco requirements, and facility-specific requirements. The HESP must be reviewed and approved by the Sunoco Contact.
- The HESP must include a project-specific Emergency Response Action Plan.
- Contractor site personnel must read or be trained on the contents of the HESP and must acknowledge by signature that he/she will comply with HESP.

## **5.7 Hazard Identification and Mitigation (Job Safety Analysis)**

- Contractors/Subcontractors shall use standard risk assessment methods to identify and communicate hazards. These methods should facilitate:
  - Identification, likelihood, and consequences of occurrence of identified hazards.
  - Implementation of necessary controls.
  - Use of Job Safety Analysis (JSA) or similar tool for identification and communication of hazards.
  - Development of effective hazard control systems prior to mobilization and construction.
  - The preferred hierarchy for the control or management of risks shall be:
    - Elimination – eliminate hazards through design/process modification.
    - Substitution – replace hazardous materials/processes with less hazardous option(s).
    - Isolation – physically remove the person from the exposure hazard.
    - Engineering – provide for a structural change to the work environment, process, or equipment.
    - Administrative – control hazard exposure events through job rotation, warning signs, barriers, etc.
    - Personal Protective Equipment – place a barrier between the wearer and the hazard.
- Contractors performing work on the site will be required to complete a daily JSA Card before their work starts.
- Contractor companies can develop and use their own customized JSA Cards.
- An example JSA Card is included in Appendix B.
- Contractors must inform the Sunoco Contact of any unique hazards presented by the work, or any hazards found by the Contractor in the work environment.

## **5.8 Hazard Communication**

- Contractors must comply with OSHA's Hazard Communication Standard.
- Contractors must maintain an Inventory of chemicals that they have on site.
- Contractors must maintain copies of Safety Data Sheets (SDS) for each of the chemicals listed in their Inventory.
- SDS Sheets can be used to identify hazards and select PPE.
- Any hazardous liquids brought on site (such as, gasoline, fuels, and solvents) must be stored in properly labeled container that is designed to contain the material.
- Sunoco SDS's area available online on CHIP II Central or MSDS Online service.

## **5.9 Personal Protective Equipment (PPE)**

- Contractors must conduct a Hazard Assessment to determine the PPE needed for task.
- Anything not covered in the Hazard Assessment should be addressed in the daily JSA Card.
- The minimum PPE that must be worn by contractors at the Sunoco facilities includes:
  - Hardhat
  - Safety glasses with attached side shields
  - Flame-resistant clothing (FRC)
  - Safety-toed work boots
  - Work gloves that are appropriate for the hazard(s)
- Contractors whose work requires the use of respiratory protection must be medically cleared, fit tested, and adequately trained for respirator use by their employer.
- Certain jobs or activities will require the use of special high-visibility clothing. Examples include: loading racks, work near active roadways or parking lots, Hole Watch, Fire Watch.
- Clothing that is not permitted to be worn on-site includes:
  - Tank tops
  - Clothing that is excessively loose, damaged, or contaminated
  - Shorts
  - Footwear with holes or openings
  - Damaged PPE
  - Faceshields without a hardhat
  - Body belts as fall protection
  - Sunglasses or prescription glasses that do not meet ANSI safety eye protection requirements
  - Clothing that would be considered offensive

## **5.10 HES Audits**

- Contractors are required to conduct audits of their worksite and employees.
- Contractors can use their own HES Audit Sheet.
- Sunoco personnel should audit their contractor companies periodically.
- An example HES Audit Form (field) is attached as Appendix C.
- An example PSM Audit of Contractor Company (office) is attached as Appendix D.
- Contractors should provide corrective actions to deficiencies identified in audits.

## **5.11 Fit for Duty or Medical Screening**

- The Contractor must ensure that their personnel are fit-for-duty and are physically and psychologically-capable of performing the job tasks assigned.
- The Contractor, when required by regulations (HAZWOPER, Asbestos, Lead, etc.) or when otherwise needed, shall provide medical surveillance for its workers.
- The Contractor must conduct medical sampling (where required) to ensure personnel are not overexposed to hazards while working.

## **5.12 Industrial Hygiene Requirements**

- Contractors must assess the Industrial Hygiene issues associated with their specific work activity.
- Sunoco personnel will conduct air monitoring when issuing Work Permits for Hot Work, Confined Space Work, and when there is a concern over gases and vapors.
- Contractors are responsible for any continuous air monitoring during the work.
- Contractors are required to supply and maintain (calibrate, documentation, maintenance, bump test, etc.) all personal and/or area gas monitoring equipment they own.

## **5.13 Training and Communications**

- Contractor workers must complete training required by the site, Federal, State, and local entities.
- This training may include OSHA Process Safety Management (29 CFR 1910.119), OSHA HAZWOPER (29 CFR 1910.120), supervisory training, site-specific training, regulation-specific training, etc.

- Operators of cranes, heavy equipment, mobile equipment, vehicles, etc. must have the appropriate certifications, licenses, training, and records to prove he/she is authorized to operate the equipment.
- Personnel doing rigging or providing hand signals to cranes must be trained and deemed qualified to perform this function.
- Contractors must establish an effective method of providing H&S and other job-specific communications to their personnel.
- Postings that are required by the facility or government regulations must be posted in visible and commonly used locations.

#### **5.14 Working at Heights**

- Contractors must comply with OSHA and facility Fall Protection requirements.
- When personnel need to access and/or work at an elevated location, a safe means of access must be provided.
- The general rule is that fall protection is required when working 4 feet or more above the lower level.  
Note: It is recognized that OSHA has a variety of heights listed for when fall protection begins to be required (general industry, construction, scaffolds, steel erection, etc.). However, in order to provide simplicity of one height, 4 feet or more is the rule. This height is set for all personnel on site as it is the most conservative and is listed in OSHA General Industry regulations.
- If work is planned to occur on a roof, the method and controls for providing adequate fall protection must be documented in a Fall Prevention Plan or General Pre-plan.
- Personnel working in high reaches, boom trucks, scissor lifts, suspended baskets, and similar devices must wear a full body harness with lanyard(s) and maintain 100% fall protection.
- Scaffolds must meet OSHA requirements.
- Scaffolds must be designed by a Qualified Person.
- Scaffolds must be inspected by a Competent Person prior to use each shift.
- A tagging system must be used on scaffolds to signify and describe in writing if the scaffold is safe to use, not safe to be used, or can be used with certain controls or cautions (such as, the requirement to wear fall protection). The typical color scheme is:
  - Green = Safe to Use
  - Red = Not Safe
  - Yellow = Can be used with certain controls and cautions
- When using ladders, the proper ladder type must be used and the ladder must be used as designed.
- Ladders must be placed on a solid and or secure surface.
- Ladders must be kept from moving by use of a person holding the ladder or by tying the ladder to a secure object.
- Extension ladders must extend 3 feet above the work landing.
- Always face the ladder when ascending or descending and maintain 3 points of contact.
- Do not carry any objects when climbing ladders.
- Do not throw objects to other workers.
- Do not use wooden ladders onsite.

#### **5.15 Lighting**

- The lighting for the work location must meet regulatory requirements.
- Temporary lighting can be used to illuminate the general work area.
- Portable lighting can be used to light a specific work location or walking path.
- Temporary and portable lighting must meet the Electrical Area Classification for that specific area.

#### **5.16 Compressed Gas Cylinders**

- Compressed gas cylinders must be handled in accordance with regulatory requirements.
- Compressed gas cylinders should be kept secured and in an upright position.
- Compressed gas cylinders must be labeled.
- Separate fuel gas cylinder from Oxygen cylinder by distance (at least 20 feet) or by a proper fire proof barrier.

- Flash back arrestors must be used on fuel gas and Oxygen supply lines or torches.

### **5.17 Inspections of Equipment**

- Contractor must conduct pre-use inspections of tools and equipment. Examples include (but are not limited to):
  - Heavy construction equipment
  - Light construction equipment
  - Cranes
  - Forklifts
  - High reaches
  - Vehicles
  - Drilling rigs
  - Vacuum trucks
  - Hoses
  - Rigging
  - Scaffolds
  - Power tools
  - Hand tools
  - Electric cords
  - Personal protective equipment (PPE)
  - Respiratory protection
- Unsafe tools, equipment, and PPE cannot be used until properly repaired or replaced.

### **5.18 Excavations**

- Excavations must be set up in accordance with regulatory requirements.
- The appropriate One Call notification (811) must be made in accordance with local reporting requirements to identify underground utilities.
- Excavations must have the soil type evaluated by an Excavation Competent Person, and he/she must protect personnel from potential cave-ins or danger by using appropriate controls (such as, shoring, sloping, or benching).
- Daily documented inspections of excavations are required by an Excavation Competent Person when personnel enter the excavation.
- Where the Excavation Competent Person finds evidence of a situation that could result in a possible cave-in, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions, exposed employees shall be removed from the hazardous area until the necessary precautions have been taken to ensure their safety.
- If an excavation is 4 feet deep or deeper, a fall protection barrier is required near the edge of the excavation. The fall protection barrier must be able to withstand 200 lbs of force in any direction.
- If an excavation is to be entered and it is deeper than four feet, it is considered a Confined Space and a Confined Space Program must be followed. Some excavations can be de-classified as a Non-Permit Required Confined Space if it meets certain criteria. A formal review is needed by the Sunoco Contact, Sunoco H&S Specialist, and the Excavation Competent Person.
- Excavations must be repeatedly checked for potential issues like cracks, water accumulation, and potential cave-ins.
- Safe means of access and egress must be in place for personnel entering excavations.
- In trenches, safe means of access and egress must be within 25 feet of any worker at all times.
- Spoils piles must be kept at least 2 feet away from the edge of the excavation.
- Structures and equipment in the area cannot be undermined by the excavation.
- Soils must be checked to see if it meets environmental requirements for removal, relocation, or replacement (backfilling).

### **5.19 Vacuum Trucks**



- The owner of the vacuum truck must maintain the original manufacturer's design features unless approval is obtained from the manufacturer to modify it.
- Appropriate Safety Releases and alarms are required on vacuum trucks.
- Vacuum truck operators (VTO) are required to complete all inspections and have required certifications in place and current.
- A fire extinguisher that is charged and current with inspections is required to be available on the vacuum truck (minimum 20 lb. BC).
- All hoses, couplings, connectors, and nozzles are required to be in good condition and are required to be designed to transfer the type of material, pressure, and temperature without damage or deterioration of the hose.
- Unsafe conditions discovered during inspections, maintenance, or use are required to be corrected before continued use of the vacuum truck.
- The VTO must know the height, empty weight, and approximate full weight of the vacuum truck.
- VTO must verify that there is adequate overhead clearance when driving under overhead objects (such as, pipes, wires, equipment, etc.). Spotters must be used if any part of the vacuum truck will be within 4 feet of any overhead electric line, communication line, piping, piperack, or any other structure.
- VTO must ensure the vacuum truck does not exceed weight limits of roadways, bridges, overpasses, etc.
- VTO must possess a valid Commercial Driver's License with appropriate endorsements.
- Personnel in the work crew are required to complete applicable training.
- It is prohibited to mix incompatible materials or materials that may react inside the vacuum trucks. The VTO must determine what is safe to mix.
- For vacuum trucks that are travelling on public roads, proper paperwork, placards, and references (e.g. bill of lading, DOT references, Emergency Response Guideline booklet, etc.) must be in/on the truck.
- Air monitoring is to be done by the vacuum truck company crew to determine if chemicals are present that require controls (engineering, administrative, or PPE) at the source of the vacuuming or at the exhaust of the vacuum truck.
- The vacuum truck crew must conduct a hazard determination prior to and during vacuuming material to determine what PPE (including respiratory protection) is needed.
- Vacuum trucks, hoses, and vessels involved in the operation are required to be properly bonded and grounded at all times before and during transferring operations to remove static charge.
- The vacuum truck should be parked upwind of vapor sources.
- The vent hose or vent stack must be positioned and be long enough to keep emissions away from personnel, ignition sources, and offsite receptors.
- Smoking, or any other sources of ignition, is not permitted within 100 feet of a vacuum truck.
- When vacuum trucks are parked and operated, the parking brake and wheel chocks are required to be set.
- Operators are required to keep all body parts away from open-ended suction valve or vacuum hose. Never place your hand or any body part in front of the open vacuum hose to test for suction.
- Appropriate measures must be taken to prevent people in the area from being struck by vacuum truck hoses (such as, whipping or jumping in the hose).
- The VTO must stay within 10 feet of the truck or within the operational switches/controls of the equipment as set by the equipment manufacturer (whichever is less) throughout the operation. This allows the VTO to stop the operation if an event occurs.

## **5.20 Electric Safety and Overhead Power Lines**

- Personnel performing electrical work must meet the training and qualification requirements described in NFPA70E Standard for Electrical Safety in the Workplace.
- Ground fault circuit interrupters must be used to protect all temporary electric cords and portable corded tools.
- Electric tools must be in good condition and inspected prior to use.
- Electric cords and plugs must be kept out of standing water.
- For certain work and in certain areas, the plugs on electric cords will need to be of the Twist-Lock Type.
- When working within 10 feet of overhead power lines, a written plan must be completed to outline how the work will be completed safely. Items to consider in this plan include, but are not limited to:
  - De-energizing the overhead line(s)
  - Moving overhead line(s)

- Maintaining a safe distance as defined by OSHA, 29 CFR 1926, Subpart CC – Cranes and Derricks in Construction.
- Installing locks or warning devices on equipment to prevent encroaching or contacting the overhead line(s)
- Protecting the lines from incidental contact and damage
- Installing warning systems
- Use of Spotters

### **5.21 Lockout /Tagout**

- When Contractors are planning to work on Sunoco equipment that has any energy sources, the Sunoco Lockout/Tagout Safety Standard will be followed.
- When contractors are working on their equipment that is not tied into Sunoco equipment, the Contractor must follow its Lockout/Tagout Program.

### **5.22 Confined Space Entry**

- Alternate methods of completing work without entering a confined space must be considered prior to planning a confined space entry.
- When Contractors are planning to enter a Confined Space that is either Sunoco equipment or an excavation on Sunoco property, the Sunoco Confined Space Safety Standard will be followed.
- Confined spaces must have signs signifying that it is a confined space.
- A Confined Space Pre-plan must be used to perform a hazard assessment and plan the entry into the confined space.
- Chemicals of concern must be determined and assessed during the pre-planning process.
- Hazards will be identified and be removed and/or controlled.
- The appropriate PPE (including respiratory protection) must be determined.
- The following prevention services must be determined during the pre-planning process:
  - Ventilation
  - Air monitoring
  - Hole Watch
  - Communication systems
  - Permit system
  - How to summons emergency services
- When contractors are entering their equipment that is not tied into Sunoco equipment, the Contractor must follow its Confined Space Entry Program. The Contractor must inform the Sunoco Contact and Sunoco H&S Specialist of the planned entry so they can review the Contractor's plans.

### **5.23 Vehicle Safety**

- Motor vehicles must pass state inspection requirements and be in proper working order.
- Drivers of motor vehicles must have a valid driver's license.
- Motor vehicles must not be left running while unattended.
- Motor vehicles must be operated in a safe manner.
- The driver and all passengers must wear seatbelts all the time.
- The use of any mobile phone is prohibited when driving. The vehicle must be stopped in a safe location prior to using any mobile phone.
- Vehicles must be parked in a way that allows for the driver to drive forward when exiting. This is intended to prevent incidents when backing out of parking spots and to allow quicker/safer exit if there is an emergency.
- Motor vehicles and any mobile equipment must not be operated by anyone under the influence of alcohol or illegal drugs.

### **5.24 Fire Protection**

- Contractors must assess the fire hazards of the workplace and provide appropriate control measures.
- Prior to starting hot work, the Contractor must remove flammable and combustible materials within 35 feet of the hot work.

- Proper and adequate fire protection equipment (fire extinguishers, fire hoses) must be available at the work site (where necessary) and must be current with inspections (annual and monthly).
- A Fire Watch is required for all Open Flame Hot Work and for other hot work activities as the Permit Issuer deems appropriate.
- The Fire Watch must remain in place for at least 30 minutes after the hot work stops in order to monitor for slow-developing fires.
- All fires must be reported to the Sunoco Permit Issuer and Sunoco Contact as soon as possible.

#### **5.25 Cranes – Lift Plans – Training Certification**

- The requirements of OSHA 29 CFR 1926, Subpart CC – Cranes & Derricks in Construction must be followed.
- Cranes must be inspected according to OSHA requirements.
- Crane operators must meet OSHA's and the state's training and certification requirements.
- Riggers and Signal Persons must be trained and deemed qualified by their employer prior to performing this function.
- The weight of the object to be lifted must be determined.
- The crane is not permitted to be used to lift in excess of 85% of its capacity.
- Lift plans will be required to be created by the Contractor for certain lifts. See the Sunoco SS-14 Cranes, Rigging, Hoisting, and Using Suspended Personnel Baskets for the Lift Plan and pre-plan requirements.
- Outriggers must be fully extended and used.
- The crane operator (or a representative of the crane company) or the General Contractor is the "controlling entity" when assessing the ground conditions in terms of supporting the crane.
- Taglines must be used.
- Sound a horn prior to each lift.
- Never allow anyone under a suspended load.

#### **5.26 Asbestos**

- Work that involves Asbestos Containing Material or Potentially Asbestos Containing Material must be done following OSHA requirements.
- Notices and approvals that are required by a regulatory agency or a facility must be acquired prior to starting work.
- Properly trained and qualified personnel must do ACM and PACM removal.
- Proper controls and warnings must be used during ACM and PACM removal.
- Proper handling and disposal of the ACM and PACM must occur.
- Proper air sampling for personnel and areas must be done.

#### **5.27 Lead**

- Work that involves Lead-based paint and other solids must be done following OSHA requirements.
- Notices and approvals that are required by a regulatory agency or a facility must be acquired prior to starting Lead abatement work.
- Properly trained and qualified personnel must do Lead abatement work.
- Proper controls and warnings must be used during Lead removal.
- Proper handling and disposal of the Lead must occur.

#### **5.28 Demolition**

- Demolition work must be done in compliance with OSHA 1926 Subpart T - Demolition.
- Demolition work must be planned properly.
- The Contractor is responsible to acquire all demolition permits.
- A competent person must be on site when demolition is occurring.

#### **5.29 Imminent Danger Situations**

- Upon discovery of any Imminent Danger situation (condition or practice) that may reasonably be expected to cause serious physical harm, illness, death, or significant environmental damage, the work or activity of concern must be suspended and Sunoco LP contact notified immediately. Work may resume only after the concern has been corrected.
- Examples of Imminent Danger situations include, but are not limited to:
  - Unprotected exposure to falls from elevations
  - Excavations not properly shored, sloped, or benched
  - Electrocution hazards
  - Operation of equipment, machinery, tools, or vehicles in an unsafe manner or by unqualified personnel
  - Bypassing the Lockout/Tagout requirements
  - Unauthorized entry into a Confined Space
  - Working in an IDLH atmosphere without proper permission and without proper respiratory protection
  - Intentionally dropping material from elevations without proper barriers
  - Intentionally allowing heavy material to fall without proper barriers
  - Unauthorized use of an ignition source near a flammable gas or vapor
  - Intentionally by-passing safety devices on equipment

### **5.30 Identify and Train Contract Administrators**

- The Contract Administrator (CA) has the responsibility to oversee contract work.
- The CA should understand the commercial contract management process.
- The CA should have undergone and passed Contract Administrator training (initial and periodic training).
- The CA provides oversight to give assurance that:
  - The Contractor's work is performed in accordance with contract terms.
  - The Contractor's employees are informed of the Sunoco's health, safety, security, and environmental standards.
  - The Contractor performs self-inspections for health, environment, and safety.
  - The Contractor reports all incidents, near misses, and conflicts to the CA.
- The CA participates in formal Contractor inspections and also conducts periodic spot-checks of compliance with legal requirements.

### **5.31 PSM Audits of Contractors**

- Sunoco H&S Specialist periodically evaluates the performance of the PSM-covered contractor employers in fulfilling their requirements of the PSM Standard.
- Audits of select PSM-covered contractors are conducted each year using the audit sheet contained in Appendix D.
- Nonconformances or areas of concern are addressed as appropriate.

### **5.32 Security**

- Each person requesting entry to Sunoco property must possess the appropriate credentials (e.g. driver's license, personal identification, TWIC card).
- Contractor/Subcontractor personnel shall not roam around Sunoco facilities or occupy and/or pass through areas outside their designated areas.
- All vehicles and personal property brought on to Company sites are subject to security screening.
- All Security incidents or suspected security infractions must be reported to the Sunoco contact immediately.

### **5.33 Third Party Worker Oversight**

- There are certain projects that will require Third Party Workers to access the facility.
- Third Party Workers' Projects or Work must have the following steps included in the project oversight to ensure that all necessary HES requirements are followed:
  - A Sunoco Point-of-Contact is assigned to the project.
  - HES Orientation for the Third Party Workers.
  - Third Party Workers must follow their company's HES requirements.

- Third Party Worker must follow agreed-upon Sunoco HES requirements while on-site. These will be discussed and agreed to in a pre-job meeting between the Third Party Worker's company representative and the appropriate Sunoco personnel.
- The Sunoco Point-of-Contact will assist in the coordination of their work, to avoid conflicts, to answer questions, and to ensure that HES requirements are followed.

## 6.0 Self Assessment

This Safety Standard will be reviewed periodically to ensure compliance.

## 7.0 Key Documents/Tools/References

- 29 CFR 1910 General Industry Safety Standards
- 29 CFR 1926 Construction Safety Standards
- 29 CFR 1910.120 / 1926.65 Hazardous Waste Operations and Emergency Response
- 29 CFR 1910.119 / 1926.64 Process Safety Management of Highly Hazardous Chemicals
- 40 CFR Protection of the Environment
- Appendix A – Contractor Injury and Illness Reporting Form
- Appendix B – JSA Card
- Appendix C – Contractor HES Audit Form
- Appendix D – PSM Audit of Contractor Company

## Revision Log

Revision Date	Revision Details
12/6/2019	Merged several existing documents to create a new Safety Standard.
3/29/2021	Updated audit sheets in Appendix C and D.
6/11/2021	Removed ISNetwork and added Veriforce as PQF review option.

## Appendix A Contractor Injury and Illness Reporting Form

\* Please complete ALL SECTIONS \*

GENERAL INFORMATION	
Employee Name	
Contractor Company	
Facility / Location	
Date of Incident	Time of Incident
Time Reported to Sunoco LP	Unit / Location
Designated Sunoco LP Contact Name	
Was Designated Sunoco LP Contact Notified?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Was employee treated by Emergency Response personnel?	<input type="checkbox"/> YES <input type="checkbox"/> NO

INJURY INFORMATION	
Description of Incident and Location (be as detailed as possible)	
Equipment Involved	
Equipment ID#	
Action Involved (struck by, fall at grade, fall from height, pinched by, crushed by, cut by, etc.)	
This incident was an:	<input type="checkbox"/> Injury <input type="checkbox"/> Illness
Type of Incident (check only one)	<input type="checkbox"/> Non-Occupational/Personal Injury <input type="checkbox"/> No Treatment (Report Only) – No Injury or Illness <input type="checkbox"/> First Aid Treatment <input type="checkbox"/> Recordable – No Days Away from Work (DAW) or No Restricted Duty <input type="checkbox"/> Recordable with Days Away from Work      Estimated Days Away: _____ <input type="checkbox"/> Recordable with Restricted Duty/Transfer      Estimated Restr. Days: _____
MEDICAL TREATMENT	
Body Part(s) Affected	<input type="checkbox"/> Left <input type="checkbox"/> Right
Medical Diagnosis	
Medical Treatment Received:	
<input type="checkbox"/> YES <input type="checkbox"/> NO	
Describe in detail the medical treatment received, including any medication given:	
Did treating physician recommend restricted duty or time away from work? <input type="checkbox"/> YES <input type="checkbox"/> NO	
If yes, please describe the restrictions in detail:	

<input type="checkbox"/> Hospital/Clinic Treatment Hospital/Clinic Name (if applicable):  Treating Physician Name:  Address: City/State/Zip: Telephone Number:	<input type="checkbox"/> Private Physician Treatment Physician Name:   Admitted: <input type="checkbox"/> Yes <input type="checkbox"/> No Time/Date Arrived:
If Taken To the Emergency Room: <input type="checkbox"/> Ambulance <input type="checkbox"/> Employee Escorted by Other Worker to ER <input type="checkbox"/> Employee took self to ER	

EMPLOYEE INFORMATION			
Occupation	Date of Birth	Marital Status	<input type="checkbox"/> Single <input type="checkbox"/> Married
Time worked at Job/Facility		Time worked with company	
Address		Time reported to work on day of incident	
City/State/Zip		Number of days worked in prior 14 days	
Telephone			

PERSON COMPLETING THIS FORM			
Name	Title		
Telephone	E-Mail		
Date and Time This Form Completed			
SUPPORTING DOCUMENTATION			
Please also submit the following supporting documentation with this form:			
JSA Submitted?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please explain:	
Pictures Submitted?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please explain:	
Permit Submitted?		<input type="checkbox"/> If no, please explain:	
<input type="checkbox"/> Yes – Electronic Permit System (EPS) Number: <input type="checkbox"/> Yes – Copy of Permit Attached (Handwritten or EPS)			
Medical Treatment and/or Return to Work Documents Included?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If No, please explain:	
Statements Submitted?	Injured Party: <input type="checkbox"/> Yes <input type="checkbox"/> No Supervisor: <input type="checkbox"/> Yes <input type="checkbox"/> No Witness(es): <input type="checkbox"/> Yes <input type="checkbox"/> No		
If Yes, please describe:   Other Information or documentation submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No			

## Appendix B – Example Job Safety Analysis (JSA) Card

<p><b>SAFETY CHECKS - Check the box if hazard is present or is a potential hazard</b></p> <p><b>Most Common Injury Causes:</b></p> <p><input type="checkbox"/> Strain type injury (Material Handling) issue?</p> <p><input type="checkbox"/> Slipping or tripping hazards (fixed equipment, obstacles, small bore piping, congested areas, holes, spills, ice, hoses, or debris)?</p> <p><input type="checkbox"/> Potential for chemical exposure (liquids, vapors, dusts)?</p> <p><input type="checkbox"/> Is there a potential for a hot or cold burn?</p> <p><input type="checkbox"/> Potential for a pinching, crushing injury?</p> <p><input type="checkbox"/> In the "Line of Fire" if a failure occurs?</p> <p><input type="checkbox"/> Sharp contact points/cut hazards (Kevlar)?</p> <p><b>Other Potential Injury Causes:</b></p> <p><input type="checkbox"/> New people in the crew? New to the facility?</p> <p><input type="checkbox"/> Any non-work distractions with the crew (fatigue, rushing, complacent, frustration)?</p> <p><input type="checkbox"/> Is there a fall hazard?</p> <p><input type="checkbox"/> Are there electrical hazards present?</p> <p><input type="checkbox"/> Is special electrical PPE required?</p> <p><input type="checkbox"/> Exceed 10% of the LEL?</p> <p><input type="checkbox"/> Does this conflict with other work in area?</p> <p><input type="checkbox"/> Noise at or above 85 dB?</p> <p><input type="checkbox"/> Adverse weather conditions?</p> <p><input type="checkbox"/> Is additional training required?</p> <p><input type="checkbox"/> Plugged drain or bleeder?</p> <p><input type="checkbox"/> Limited clearance to do any task/Ergonomics?</p> <p><input type="checkbox"/> Potential unit upset or shutdown?</p> <p><input type="checkbox"/> Potential for Lead or Asbestos exposure?</p> <p><input type="checkbox"/> Lighting inadequate?</p> <p><input type="checkbox"/> Venting/draining near ignition source?</p> <p><input type="checkbox"/> Is Nitrogen exposure a hazard?</p> <p><input type="checkbox"/> Proper tool being used (correct cutting tool, non-wooden handle)?</p> <p><input type="checkbox"/> Waste storage/labeling/disposal?</p> <p><input type="checkbox"/> Spill/release containment?</p> <p><input type="checkbox"/> Shutdown of pollution control equipment?</p>	<p><b>WORKER NAMES – (MUST PRINT)</b></p> <p>1) _____</p> <p>2) _____</p> <p>3) _____</p> <p>4) _____</p> <p>5) _____</p> <p>6) _____</p> <p>7) _____</p> <p>8) _____</p> <p>9) _____</p> <p>10) _____</p> <p>11) _____</p> <p>12) _____</p> <p>13) _____</p> <p>14) _____</p> <p>15) _____</p> <p>16) _____</p> <p>17) _____</p> <p>18) _____</p>	<p><b><u>JOB SAFETY ANALYSIS (JSA) CARD</u></b></p> <p>Date: _____</p> <p>Facility: _____</p> <p>Unit Name or Location: _____</p> <p>Contractor Company: _____</p> <p>JSA Writer: _____</p> <p>Job Description: _____</p> <p>Types of Work Permits Needed: _____</p> <p>Sunoco Contact.: _____</p> <p>How to reach Sunoco Contact: _____</p> <p>Emergency Number: _____</p> <p>Emergency Assembly Area: _____</p> <p>Location of nearest Safety Shower: _____</p> <p>Toolbox/Tailgate Safety Meeting Topic(s): _____</p>
<p><b>1. List Job Steps in Sequence</b></p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p> <p>6. _____</p> <p>7. _____</p> <p>8. _____</p> <p>9. _____</p> <p>10. _____</p> <p><b>***FOCUS ON*** 4 MOST COMMON INJURIES</b></p> <p>Describe Material Handling Hazards: _____</p> <p>Describe Slip/Trip/Fall Hazards: _____</p> <p>Describe Chemical/Thermal Burn Hazards: _____</p> <p>Describe Cut/Pinch/In-Line-Of-Fire Hazards: _____</p>	<p><b>2. List Potential Hazards with Each Step</b></p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p> <p>6. _____</p> <p>7. _____</p> <p>8. _____</p> <p>9. _____</p> <p>10. _____</p> <p><b>Safety Procedures Checklist:</b></p> <p><input type="checkbox"/> Proper PPE is being worn</p> <p><input type="checkbox"/> Job physically "shown by" a Permit Issuer</p> <p><input type="checkbox"/> Crew reviewed Work Permit</p> <p><input type="checkbox"/> Lockout/Tagout for this work is 100% correct</p> <p><input type="checkbox"/> Gas Testing prior to Hot Work</p> <p><input type="checkbox"/> Fire Watch assigned</p> <p><input type="checkbox"/> Work above or below (cable/wire/piping)</p> <p><input type="checkbox"/> Excavation inspected by Competent Person</p> <p><input type="checkbox"/> Scaffold inspected by Competent Person</p> <p><input type="checkbox"/> Confined Space Pre-plan reviewed</p> <p><input type="checkbox"/> Hole Watch assigned</p>	<p><b>3. Actions to Eliminate or Mitigate Hazards?</b></p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p> <p>6. _____</p> <p>7. _____</p> <p>8. _____</p> <p>9. _____</p> <p>10. _____</p> <p><b>Material Handling Checklist:</b></p> <p><input type="checkbox"/> Proper Lifting Technique discussed</p> <p><input type="checkbox"/> Pinch Points (setting equipment, handling materials)</p> <p><input type="checkbox"/> Two Person Lifting Required &gt;70 lbs.</p> <p><input type="checkbox"/> Two Person Lifting Required – Awkward Material</p> <p><input type="checkbox"/> Specific PPE (i.e. cut-resistant Gloves)</p> <p><b>Vehicle, Crane, &amp; Mobile Equipment Checklist:</b></p> <p><input type="checkbox"/> Vehicle/equip was inspected</p> <p><input type="checkbox"/> Vehicle/equip is properly parked (to pull forward on exit)</p> <p><input type="checkbox"/> Seatbelts worn at all times</p> <p><input type="checkbox"/> Cell phones not used while driving/operating</p> <p><input type="checkbox"/> Spotters used while driving/operating as required</p>





## Appendix C - Contractor HES Audit Form

<b>Group / Company:</b>		<b>Location/Project:</b>		
<b>Date:</b>	<b>Auditors:</b>			
<b>Total Score (2 points per item, maximum 100 points):</b>				
	Yes	No	N/A	Comments
Workers are Signed-in per facility requirements *				
Contractors know how to report an emergency and know where to go if there is an emergency (Assembly Area, Muster Point) *				
JSA is complete and has been reviewed with crew				
All workers wearing proper PPE: safety glasses with side shields, hardhat, safety-toed work boots, FR Clothing, gloves per hazard				
Hearing protection worn where required / noisy area or equipment				
Respiratory Protection used properly, acceptable facial hair				
If Ice is present, workers are wearing traction-improving footwear				
Workers were informed of the potential fire, explosion, and toxic hazards related to the contractor's work *				
Work Permit complete, adequate, at the jobsite, and being followed *				
Workers are aware how to obtain an SDS				
Flammables and Combustibles are removed or guarded a minimum of 35 feet from open flame hot work				
Fire extinguishers on site where required and inspected				
Fire Watches are in place, aware of duties, can reach all jobs, wearing vest, and have required firefighting equipment				
Oxygen & fuel gas cylinders separated by a steel plate or by 20 feet				
Gas cylinders secured upright with chain or equivalent device				
Proper burning, cutting, welding, or grinding PPE being used				
Grinders equipped with guards & handles				
FR Tarps/Curtains/Covers used as required				
Work Zones properly demarcated with tape, flagging, or barriers (Red = Keep Out or Drop Zone, Yellow = Caution, Blue = N2)				
Safe means of access and egress is provided for elevated work				
Personal Fall Protection Equipment inspected and properly used for unprotected work above 4 feet				
Lanyards tied off to appropriate anchor point				
Ladders inspected, setup properly, and used properly				
Scaffold is built properly: Top-rail, mid-rail, & toe-board in place; level, planking secured and without large holes; scaffold secured from falling; wheels locked on rolling scaffold				
Scaffold tagged properly and conditions on the tag being followed				
Workers understand the work practices for opening process equipment and piping (verify if safe, open top-down, open away from you, avoid pinch points, evaluate if material will fall/roll/swing/cause damage) *				

	Yes	No	N/A	Comments
Workers understand Confined Space Entry safe work practices and they are following them *				
Equipment has been properly isolated per site procedure for entry, & Confined Space sign(s) posted at entrance(s) to Confined Space *				
Confined Space Pre-plan was reviewed and signed *				
Hole Watch present, knowledgeable of duties, and Sign-in Log is accurate *				
All needed initial IH air monitoring complete or in progress *				
Continuous air monitoring and Ventilation used where required *				
Vacuum truck vent hose is set up downwind, adequate length, away from people and ignition sources				
Workers understand LOTO safe work practices and they are following them *				
Equipment has been properly bonded and grounded when required				
Electric cords are in good condition (no fraying, temporary repairs) and connections are kept out of standing water				
Electric cords, hoses, welding leads, etc. are protected from damage and do not create trip hazards				
High voltage electrical lines and communication lines identified & protected				
Heavy equipment is inspected daily				
Rigging inspected daily and is in good condition				
Crane's swing radius is properly barricaded to prevent access				
Crane lifts are monitored to assure that loads are not lifted over people and using a horn to alert people prior to the lift				
Back-up alarms are operational on vehicles and Spotters are used where required				
Prior to starting Excavation, a One Call was done and a Competent Person identified				
Excavation is Inspected, Sloped/Shored/Benched or Boxed, Spoils 2-ft away, Egress within 25 feet, Barrier / Warning material (fencing, tape, lights, etc.) in place				
Lead-based Paint & Asbestos identified and proper controls in place				
Good housekeeping				
Metal safety cans used for gasoline and diesel with proper labeling				
Drums/containers in good condition, marked/labeled and dated where needed, closed when not in use				
No liquids or solids spilled on ground, roads, sewers, surface water				
<b>Subtotal:</b>				
<b>Total Score (Combine "Yes" and "N/A" subtotals, X2 points per item, maximum 100 points)</b>				

\* = PSM regulation-related item



## Appendix D - PSM Audit of Contractor Company

<b>Contractor Company Name:</b>		
<b>Name of person completing this questionnaire:</b>		
<b>Date:</b>		
<b>1. OSHA Requirement: Work Practices Training</b> – “The contract employer shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.”		
<b>Question:</b> Do you assure that your employees are trained in the work practices necessary to safely perform his/her job?		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Comments:</b>		
<b>2. OSHA Requirement: Hazards of Job and Emergency Action Plan</b> – “The contract employer shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.”		
<b>Question:</b> Do you assure that your employees are instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan?		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Comments:</b>		
<b>3. OSHA Requirement: Training</b> – “The contract employer shall document that each contract employee has received and understood the training required by the PSM Standard. The contract employer shall prepare a record which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training.”		
<b>Question:</b> Are your employees’ training records documented indicating that each worker has received and understood the training required by the PSM Standard?		<input type="checkbox"/> Yes <input type="checkbox"/> No
Also, do you (as the contract employer) prepare a record which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training?		<input type="checkbox"/> Yes <input type="checkbox"/> No
*** Please attach <b>PSM Training</b> records for two employees showing how your company meets this OSHA requirement. Has this record been attached to this Audit response? ***		<input type="checkbox"/> Yes <input type="checkbox"/> No
*** Please attach <b>Work Practices Training</b> records for two employees showing how your company meets this OSHA requirement. Options: LOTO, Confined Space Entry, Fall Protection, Respiratory Protection. Has this record been attached to this Audit response? ***		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Comments:</b>		
<b>4. OSHA Requirement: Safety Rules</b> – “The contract employer shall assure that each contract employee follows the safety rules of the facility.”		
<b>Question:</b> Do you assure that each contract employee follows the safety rules of the facility?		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Comments:</b>		
<b>5. OSHA Requirement: Unique Hazards</b> – “The contract employer shall advise [Sunoco] of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.”		
Please describe any unique hazards presented by your work or of any hazards found by your work:		
<b>Unique Hazards:</b>		
<b>Hazards Found by your work:</b>		

### \*\*\*Sunoco Use Only\*\*\*

<b>Reviewer's Name:</b>	
<b>Date:</b>	
<b>Comments:</b>	