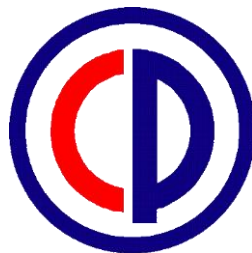


# COLONIAL PIPELINE COMPANY



## Contractor Safety Program

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1/14/2011



<u>SECTION</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
	<b>COLONIAL PIPELINE COMPANY'S SAFETY PHILOSOPHY</b>	<b>4</b>
<b>1.0</b>	<b>INTRODUCTION</b>	
1.1	Contractor Designation	5
1.2	Application of Program	5
1.3	Contractor and Subcontractor Expectations	5
1.4	Colonial's Contractor Safety Council	6
<b>2.0</b>	<b>CONTRACTOR PRE-EMPLOYMENT REQUIREMENTS</b>	<b>6</b>
2.1	Written Safety and Health Plan	7
2.2	Drugs, Alcohol, and Firearms	7
2.3	Smoking	7
2.4	Basic Safety Requirements for Contractors	7
<b>3.0</b>	<b>SAFETY PROGRAM ELEMENTS</b>	<b>8</b>
3.1	Colonial and Contractor Safety Alliance	8
3.2	Worksite Safety Responsibility and Accountability	8
3.3	Job Safety Analysis / Pre-Job Safety Meeting	8
3.4	Safety Orientation and Training	8
3.5	Daily Work Permit and Safety Checklist	9
3.6	Hazardous Waste Operations and Emergency Response (HAZWOPER)	9
3.7	Site Safety and Health Plans (for non-HAZWOPER work)	9
3.8	Bilingual Communications	9
3.9	Safety Reporting and Incident Analysis	10
3.10	Communication of Incidents and Lessons Learned	10



3.11	Hazard Communication	10
<b>4.0</b>	<b>PERSONAL PROTECTIVE EQUIPMENT (PPE)</b>	<b>10</b>
4.1	Eye Protection	10
4.2	Foot Protection and Chainsaw PPE Requirements	11
4.3	Hand Protection	11
4.4	Head Protection	11
4.5	Hearing Protection	12
4.6	Protective Clothing	12
4.7	Fire Retardant Clothing	12
<b>5.0</b>	<b>CONTRACTOR RESPONSIBILITIES</b>	<b>13</b>
5.1	Contractor Management and/or Safety Supervisor's Responsibilities	13
5.2	Contractor Supervisor's/Foreman's Responsibilities	13
5.3	Contractor Personnel Responsibilities	14



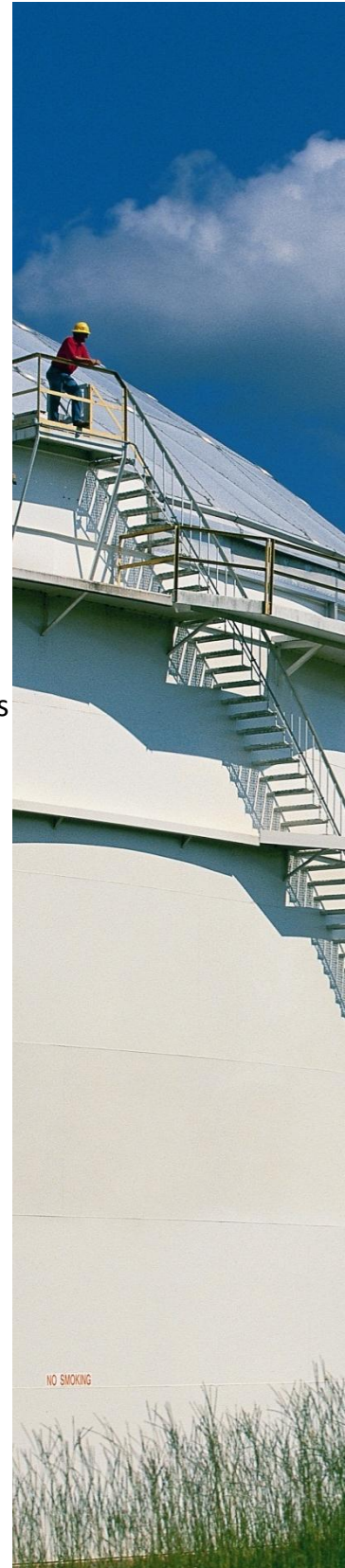
## **Colonial Pipeline Company**

### **Our Safety Philosophy**

Colonial Pipeline Company is committed to the safety of everyone impacted by its operations. This philosophy is a moral obligation and fundamental to our success. We believe all injuries and accidents are preventable because:

- We, employees and leaders, do not compromise safety to achieve any business objective.
- We are all accountable for our personal safety and the safety of all employees, contractors and the public.
- We ensure both employees and contractors are properly trained and qualified to perform their work safely.
- We empower and encourage all employees and contractors to stop, correct and report any unsafe condition.
- We only employ contractors that embrace our Safety Philosophy.
- We minimize exposure to hazards in the workplace.
- We build safety into the design, construction, operation and maintenance of our pipelines and facilities.
- We assess, learn and communicate to continuously improve our safety practices.
- We actively encourage each other to practice safety on and off the job 24/7.
- We recognize and celebrate our individual and company safety excellence.

Our personal commitment to the prevention of injuries and accidents is and always will be our greatest accomplishment. Safety as a core value ensures Colonial's future.





## **1.0 INTRODUCTION**

Colonial Pipeline Company (“Colonial”) believes that our contractors’ safety and health performance is essential to the long-range success of our business. Colonial will only employ contractors that embrace our Safety Philosophy.

This Program is intended to supplement the general conditions of a contract between Colonial and any contractor. Its purpose is to elaborate on areas of safety and health concerns routinely encountered at Colonial. This Program is not intended to replace contractors’ safety and health programs, or reduce the contractors’ responsibilities for all aspects of safe and healthy work conditions, procedures, equipment and materials for their personnel. This Program defines minimum requirements which contractors and subcontractors are expected to meet and/or exceed. The elements of this Program apply to all contractors and subcontractors performing work at Colonial facilities, leased premises and/or right-of-ways.

Successful contractor safety performance is best accomplished by working with the contractor as a partner in safety. Colonial does not take control of its contractors’ safety programs nor relieve them of their safety responsibilities. Instead, we support contractors to improve overall safety and health.

### **1.1 Contractor Designation**

Colonial contractors are grouped into one of two categories based upon the activities the contractor performs. These two groups are: ‘Safety Verified Contractors’ and ‘Non-Safety Verified Contractors.’

‘Safety Verified Contractors’ (or SVCs) include contractors who perform physical work on the pipeline or associated systems or perform a Covered Task subject to the Operator Qualification (OQ) Rule (i.e. 49 CFR Part 195, Subpart G) or who perform operations, maintenance or emergency-response functions covered in 49 CFR § 199 (incorporating by reference portions of 49 CFR § 40) that require drug and alcohol testing, education and training.

‘Non-Safety Verified Contractors’ (or non-SVCs) are contractors who are not SVCs.

### **1.2 Application of Program**

Contracts with SVC’s will include terms requiring them to comply with all the provisions of this Program.

Safety requirements for Non-SVC’s will be conveyed within the terms of a Master Service Agreement or Purchase Order (PO).

### **1.3 Contractor and Subcontractor Expectations**

Colonial selects contractors who deliver the best value for the time and money invested. Safety performance is a leading factor to be considered when determining best value. Colonial is committed to safety and health as the primary consideration in all our activities. We operate, and expect our



contractors to operate, on a principle belief that all accidents are preventable. No work shall begin without first addressing and resolving all safety hazards.

We expect contractors to conduct their business in a manner that complies with both the letter and spirit of all laws, rules, and regulations, and applicable company policies and procedures.

We expect:

- All contractor personnel to work every day without injuring themselves or others
- Contractors to have a comprehensive written safety program
- Contractors to provide new employee safety orientation
- Contractors to provide ongoing safety training necessary for their employees to safely perform their tasks as well as meeting all applicable regulatory training requirements
- Contractors, contractor employees and sub-contractors to fully accept the responsibility for a safe workplace

General contractors are accountable and responsible for ensuring their subcontractors are in compliance with the applicable provisions of this Program. Subcontractors are considered employees of the general contractor. Should Colonial determine, in its sole discretion, that a contractor or its subcontractor has failed to comply with any required provision of this Program, Colonial shall have the right to hold said contractor accountable for that breach of duty. Colonial may then exercise any and all rights available to it for breach of the terms and conditions of its contract with said contractor, specifically including treating the breach of duty as a failure to proceed with the work in a timely manner, incorporating all remedies available therefore.

#### **1.4 Colonial's Contractor Safety Council**

The purpose of the Contractor Safety Council is to improve safety performance by communicating and addressing safety concerns. The council is made up of contractors along with Colonial employee representatives from Safety, Procurement, Projects, IT, Operations and others as appropriate.

Any contractor interested in participating may contact the Health, Safety, & Security Team Leader for more information.

#### **2.0 CONTRACTOR PRE-EMPLOYMENT REQUIREMENTS**

All SVCs must meet all of the following requirements.

- Have an annual total OSHA recordable incidence rate (TRIR) equal to or less than the average for their North American Industry Classification System code (NAICS) as compared the latest data published by the U. S. Department of Labor, Bureau of Labor Statistics (BLS).
- Have established a workers' compensation experience modification rating (EMR) that is equal to or less than 1.0. Smaller contractors that are not eligible to receive an EMR will be assigned an EMR = 1.0.
- Prior to employment, complete a third party evaluation process conducted for Colonial by ISNetworld ("ISN").
- Quarterly and Annually (as required) thereafter, complete an ISN update that includes all requested information along with verification of information supplied.



- Be evaluated as 100% compliant by ISN's Review and Verification Services ("RAVS") in the areas of work they perform for Colonial.

The overall safety performance of a contractor will be evaluated during the employment process using information obtained from ISN and other applicable sources.

In some cases, Colonial may issue a variance if the contractor does not meet all of the requirements above. Variances may only be granted after the completion of a contractor safety challenge session. Challenge session participants collect information, identify areas of risk, and provide a complete assessment of the contractor to the Procurement and/or HSS Leader(s). After considering and reviewing all the information submitted, the Procurement and/or HSS Leader(s) have the authority to grant or deny a variance.

### **2.1 Written Safety and Health Plan**

SVCs shall have written safety and health plans which meet or exceed the minimum requirements set forth in this Program. SVCs shall adhere to their written safety and health plans requirements. The SVC shall furnish their written safety and health plans to ISN for third party review to assure 100% compliance with applicable OSHA standards.

### **2.2 Drugs, Alcohol, and Firearms**

Using, being under the influence of, possessing, transporting, promoting, or selling illegal drugs or drug paraphernalia, and/or otherwise legal but illicitly used substances by anyone while on Colonial premises or Colonial business is strictly prohibited. The term "Colonial premises" in this Program is used in its broadest sense and includes all ROW, land, property, buildings, structures, installations, boats, planes, helicopters, cars, trucks, and other means of conveyance owned by or leased to Colonial or otherwise being utilized for Colonial business.

The use, possession, or transportation of alcoholic beverages, firearms, explosives, or any other type of weapons is prohibited. Contractor's personnel who are found in violation of these prohibitions will not be allowed on Colonial's premises and may be referred to law enforcement agencies.

To help ensure a safe, healthy, and productive work environment, Colonial reserves the right to carry out reasonable searches of individuals and their personal effects, and contractor's vehicles when entering Colonial premises, while on Colonial premises, or when leaving Colonial premises. Such searches may be initiated by Colonial without prior announcement and will be conducted at such times and locations as deemed appropriate by Colonial. Cooperation is voluntary; however, refusal of an individual to cooperate will be cause for not allowing contractor employee(s) on Colonial premises.

Every SVC shall have a DOT compliant written Drug and Alcohol Testing Plan that has been reviewed and approved by National Compliance Management Service, Inc.

### **2.3 Smoking**

Smoking is prohibited while on all Colonial premises.



## **2.4 Basic Safety Requirements for Contractors**

Prior to work all contractor employees are required to watch Colonial's "Contractor Safety Orientation" video or review the "Basic Safety Requirements for Contractors" booklet. The video is the preferred method of orientation; however, if not available, a Colonial representative will review the "Basic Safety Requirements for Contractors" booklet with the contractor employee. The video/booklet cover the minimum safety requirements expected of all contractor employees. A hardhat decal will be provided to all contractor employees upon completion of orientation. The decal is intended to be a recognizable sign that the employee understands Colonial's minimum safety requirements. After completing orientation, the Colonial representative will enter the contractor employee's name into Colonial's Contractor Orientation database for tracking purposes. Contractor employee orientation must be renewed each calendar year, after which a new hardhat decal is issued and the Contractor Orientation database updated.

## **3.0 SAFETY PROGRAM ELEMENTS**

This section defines Colonial's minimum requirements that contractors and subcontractors are expected to meet prior to the start of any work.

### **3.1 Colonial and Contractor Safety Alliance**

The formation of a Colonial and contractor safety alliance is crucial to success. These alliances can only succeed when there is communication between Colonial and the contractor. To facilitate communication Colonial assigns a representative for all work.

### **3.2 Worksite Safety Responsibility and Accountability**

The contractor is ultimately responsible and accountable for the safety on the worksite, although Colonial representatives have the authority to stop unsafe work activities and conduct joint worksite inspections and audits.

### **3.3 Job Safety Analysis / Pre-Job Safety Meeting**

Before work begins, the contractor shall identify the hazards associated with the work at hand and perform and complete, usually in conjunction with a Colonial representative, a Job Safety Analysis (JSA) in order to eliminate or mitigate the hazards involved.

A pre-job or "safety kickoff" meeting shall be held before beginning any work. The extent and formality of the meeting will be based on the scope of the work and the job's associated hazards.

During the meeting, hazards associated with the work will be identified (using the JSA) and jobsite employees' roles and responsibilities established.



As the job's scope changes or new hazards are introduced, the JSA must be amended and reviewed with all jobsite employees. JSAs must also be reviewed with new personnel that are introduced to the job (including subcontractors).

### **3.4 Safety Orientation and Training**

Contractors shall ensure that employees receive required training that meets regulatory requirements and allows them to perform their duties safely. All contractor employees shall be trained to recognize and avoid unsafe conditions and to control or eliminate hazards.

#### **New Employee Orientation and Identification**

The contractor is responsible for internal safety orientation of their new employees and new employees for this purpose is defined as having less than 90 days on contractor's payroll. Contractor's new employees must wear a marker, visible from 360 degrees on their hardhat. Some examples of visible markers are: green stripe, stickers, separate color hardhat, etc.

#### **Employee On-Going Training**

Employee training must be refreshed as required by regulatory requirements.

#### **Documentation of Training**

Documentation of training is vital to a successful safety program. Contractors are required to document all required safety training and training records (including hardcopies of attendance rosters along with course curricula). These records must be readily accessible to Colonial upon request. All training records shall be kept in an acceptable computer database. At a minimum the database should contain the following information:

- Employees name / identification
- Training and dates attended
- Course description
- Instructor's name
- Expiration dates
- Pass/Fail/Score (if applicable)
- The capability to sort data

### **3.5 Daily Work Permit and Safety Checklist**

It is the responsibility of the contractor to obtain work authorization using the "Daily Work Permit and Safety Checklist" (aka "Pink Sheet"). Authorization is obtained through the Colonial representative and (if applicable) operations personnel at the work location. No work shall begin without proper authorization and timely notification of all affected personnel.

### **3.6 Hazardous Waste Operations and Emergency Response (HAZWOPER)**

Contractors engaged in hazardous waste operations shall ensure all employees have successfully completed the training and field experience as required by OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER), 29 CFR 1910.120. A written certificate for each employee must be provided upon request. If the contractor is given control of the post emergency clean up, the contractor



shall prepare the Site Safety and Health Plan for each shift. If Colonial retains control, Colonial shall prepare this plan. In either case, cleanup contractors are responsible for:

- Complying with the Site Safety and Health Plan
- Training their employees
- Informing their subcontractors of the provisions and requirements of the Site Safety and Health Plan
- Complying with all applicable laws and regulations

### **3.7 Site Safety and Health Plans (for non-HAZWOPER work)**

Site Safety and Health Plans may also be required for jobs involving lead, asbestos, emergency response not involving a release, or as otherwise deemed necessary by HSS or Colonial Managers.

### **3.8 Bilingual Communications**

Contractors must provide a bilingual individual for each work crew containing non-English speaking employees.

### **3.9 Safety Reporting and Incident Analysis**

All contractors shall **immediately** report to a member of Colonial's HSS team and the appropriate Colonial representative all contractor/subcontractor employee injuries/illnesses, vehicle incidents, and any damage to Colonial or third party property occurring during Colonial work.

The contractor shall conduct an Incident Analysis (IA) to determine the root causes of all incidents. The Colonial representative and a member of the HSS Team shall participate in the IA. Upon completion of the IA, the contractor shall furnish a copy of the completed report to the HSS Team Leader. IAs may also be required for serious "near misses" if deemed appropriate by Colonial.

Also, the contractor shall, by the 10<sup>th</sup> calendar day of the month following the quarter (Apr., Jul., Oct., Jan.), submit their "Quarterly Job Injury Report" to ISNetworld.

### **3.10 Communication of Incidents and Lessons Learned**

The learning and application of information shared on incidents and near misses are essential to improving safety performance.

Incident analysis reports are reviewed by Colonial's HSS Team and lessons learned are shared with the company and other contractors.

Contractors are encouraged to share lessons learned from incident analyses and near misses with their employees at subsequent safety meetings.



### **3.11 Hazard Communication**

The OSHA Hazard Communication Standard (29 CFR 1910.1200) requires that employers inform their workers of the presence, identity, and hazards of workplace materials through a written hazard communication program, labels, substance lists, material safety data sheets (MSDS), and training.

Contractors and their subcontractors shall provide Colonial, before commencing work, a list of hazardous chemicals and their material safety data sheets (MSDS) for all contractor owned hazardous chemicals on site.

Colonial Representatives will inform contractors regarding Colonial owned hazardous chemicals to which contractor employees may be exposed; and will provide contractor employees' access to the MSDSs for these chemicals. The contractor shall disseminate such information to its employees and subcontractors and assure that appropriate precautions are taken.

## **4.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Contractors are required to provide their employees with all necessary PPE. PPE assessments must be completed prior to performing work. Colonial representatives can provide more detailed information that can be found in Colonial's Safety Awareness Manual (SAM).

### **4.1 Eye Protection**

Appropriate eye protection must be worn at all times on Colonial worksites.

- Eye protection must meet ANSI Z87.1 standard for safety eyewear
- Safety glasses with side shields are the minimum protection required when there is the chance of flying debris. Jobs such as cutting grass, using impact hand tools, or light power tools are examples when safety glasses with side shields are required
  - Impact style goggles are required when working with large power tools and power or chain saws etc
  - Specially tinted glasses are required for welding, cutting or helping during these activities
  - Splash proof goggles are required during testing, sampling, gauging or any other procedure which has the potential of an employee coming in direct contact with petroleum products, acids or dangerous chemicals
  - Face shields are secondary protection and must be used in addition to the primary protection. Face shields must meet the ANSI Z87+ (High impact) rating

### **4.2 Foot Protection and Chainsaw PPE Requirements**

All contractors (while in the field) are required to wear footwear on the job which meets ASTM F2413-05 safety requirements.

When the possibility of working in water or petroleum products exists, rubber boots providing the same level of protection shall be worn.



Contractor employees who operate chainsaws must wear footwear and leggings that are specifically designed to provide protection from chainsaw cuts to the feet and legs. Boots must be either constructed of multi-layered Kevlar or meet ASTM F1818-2004 (Standard Specification for Foot Protection for Chain Saw Users) specifications. United Laboratories (UL) provides testing for boots and offers stamps of approval for models that meet the ASTM specifications. Leg protection, that meets ASTM F1897-08, shall cover the full length of the thigh to the top of the boot on each leg to protect against contact with a moving chain saw.

#### **4.3 Hand Protection**

The appropriate hand protection must be selected for the work being performed.

- A short, tight fitting canvas or leather glove should be worn during most construction and heavy maintenance work.
- Certain electrical work requires the wearing of approved insulating rubber gloves.
- Chemical resistant rubber or plastic gloves shall be worn when handling petroleum products or chemicals as specified by the chemical's MSDS.
- Long, cuffed welding gloves shall be worn during welding or grinding.

#### **4.4 Head Protection**

All Colonial contractors must properly wear head protection that meet ANSI Z89.1 Class E requirements, while on the job. Head protection is not required in highway vehicles, offices, control rooms, shop buildings or warehouse areas unless overhead work is in progress in these buildings. Welders are exempt from wearing hard hats while welding, but during actual welding only.

Contractor employees shall inspect and maintain their hard hats in accordance with manufacturers' guidelines. This inspection and maintenance should include proper adjustment of the hard hat suspension. Modification of a hard hat, which may include drilling holes, trimming, painting, or any way altering their protective properties, is prohibited. Stickers may be displayed but shall not make inspection of the hard hat shell difficult. Hard Hats and suspensions will be replaced per manufacturer's guidelines (typically 5 years for outer shell and 12 months for suspension). Hard hats must be worn per manufacturer's guidelines.

#### **4.5 Hearing Protection**

Proper hearing protection shall be used in areas designated as having high noise levels by either the contractor or Colonial Representative.

#### **4.6 Protective Clothing**

**Minimum acceptable outer wear shall be:**

- Sport shirts, blouses, or T-shirts with sleeves
- Full length trousers or overalls/coveralls
- Sleeveless shirts and blouses, tank tops, muscle shirts, mesh material shirts or blouses do not offer proper protection and are not acceptable



- Dangling sleeves, neckties, or other loose clothing or jewelry shall not be worn when working on or around machinery
- Clothing of natural materials such as wool and cotton is preferred. Nylon and or other synthetic fabric clothing are prohibited where potentially hazardous conditions exist due to static electricity.

**The following is not acceptable:**

- Clothing contaminated with product is extremely dangerous because of the danger of skin irritation or fire and therefore should be changed as soon as practical.
- Contaminated clothing should not be worn in eating areas.

**Other Apparel Concerns**

- No jewelry during general field work or electrical work
- Long hair must be arranged as to prevent entanglement

Protective clothing shall be worn when handling substances as specified by the substance's material safety data sheet (MSDS).

Contractor employees shall not wear clothing that would increase injury in the event of an electrical arc or fire. Individuals working on or near electrically energized equipment shall not wear conductive articles such as metal buttons or studs, jewelry, watches, or key chains. Contractor employees working on electrical equipment must wear the proper PPE as specified in NFPA 70 E.

**4.7 Fire Retardant Clothing**

Fire Retardant Clothing (FRC) protects individuals from flash fire. Although effective in a flash fire, FRC is not fireproof. Contractor employees are required to wear FRC when performing certain functions and when working in certain facilities.

FRC is worn as the outermost garment and shall be made from inherent flame resistant fabrics which meet the requirements of NFPA 2112. Contractor employees shall wear FRC when working in the presence of petroleum vapors, including but not limited to the following conditions:

- Within 50 feet of work on the pipeline or its associated systems open to the atmosphere where the last product in that system was gasoline.
- Such activities may include but are not limited to:
  - Line cutting or purging
  - Opening of a trap for loading or unloading
  - Meter removal or replacement
  - Pump unit case opening
  - Breaking of pipe flanges
  - Opening of or removal of valve bodies
  - Cleaning strainers
  - Opening breakout tank manways
  - Opening provers
  - Changing product filters



- During permit required confined space entry
- Descent onto floating tank roof
- Working on or around exposed electrical circuits of 600 volts or higher, energized or de-energized (Additional personal protective equipment is required when working within 10 feet of energized circuits. Consult Colonial's "Electrical Safe Work Practices" for the levels of required protection)
- Emergency response activities involving gasoline or other products

## **5.0 CONTRACTOR RESPONSIBILITIES**

### **5.1 Contractor Management and/or Safety Supervisor's Responsibilities**

- Prepares, submits and maintains RAVS Evaluation Forms to ISNetworld.
- Ensures contractor personnel are in compliance with contractor's own safety program
- Completes Job Hazard Analysis as required
- Stops, corrects and reports any unsafe work condition
- Participates in or designates alternate for Pre-Construction/Pre-Job Safety Meeting
- Ensures Contractors Quarterly Report is completed and posted on time
- Reviews and ensures compliance with the Contractor Safety Program
- Ensures that all accidents and occupational injuries or illnesses involving employees or subcontractors or which cause damage to Colonial or third party property are immediately reported to the Colonial Representative and HSS Leader/Coordinator
- Conducts a joint incident analysis with Colonial Representatives and establishes and implements corrective actions for any safety-related incidents
- Reviews Near Misses and initiates corrective actions to improve safety performance
- Complies with all applicable federal, state and local regulations and Colonial policies and procedures

### **5.2 Contractor Supervisor's/Foreman's Responsibilities**

- Ensures on-site contractor personnel are in compliance with contractor's own safety program
- Performs and completes a Job Hazard Analysis as required
- Stops, corrects and reports any unsafe work condition
- Participates in Pre-Construction/Pre-Job Safety Meeting
- Ensures that all accidents and occupational injuries or illnesses involving employees or subcontractors or which cause damage to Colonial or third party property are immediately reported to the Colonial Representative and HSS Leader/Coordinator
- Conducts a joint incident analysis with Colonial Representatives and establishes and implements corrective actions for any safety-related incidents
- Reviews Near Misses and initiates corrective actions to improve safety performance
- Complies with all applicable federal, state and local regulations and Colonial policies and procedures



**5.3 Contractor Personnel Responsibilities**

- Maintains a safe worksite
- Works every day without injuring themselves or others
- Only performs work that they are trained in and can perform safely
- Recognizes and reports all incidents and near misses to contractor supervisors
- Stops, corrects and reports any unsafe work condition
- Actively participates in safety meetings
- Complies with all applicable federal, state and local regulations and Colonial policies and procedures