



SCEP EHS STANDARDS

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Introduction

Acceptance of this purchase order confirms understanding of minimum EH&S requirements, located online at: <http://www.suncor.com/contractors/qualify-to-be-a-contractor/environment-health-safety-documents>.

All individuals conducting work at the Suncor St. Clair Ethanol facility are expected to have knowledge, experience, and training to ensure adherence to all applicable regulations that relate to the work that are executing. All individuals conducting work are expected to abide by legal requirements at all times. The subsequent information is intended to highlight and summarize key items at the Suncor St. Clair Ethanol site, but is not intended to be a comprehensive summary of legal requirements or advice and should not be taken as such.

All contractors working at the Suncor St. Clair Ethanol site must have current approval through Avetta (or have a waiver signed by their Suncor contact). All companies are expected to have safe work practices and standards that ensure workers are protected at all times that are as stringent or more than those of the Suncor St. Clair Ethanol facility. The Suncor St. Clair Ethanol practices and standards are to be utilized to outline minimum requirements and all contractors must review the applicable standards prior to the execution of work. **Access to the sites EHS practices, standards and procedures for the Suncor St. Clair Ethanol Plant are available electronically at: <http://www.suncor.com/contractors/qualify-to-be-a-contractor/environment-health-safety-documents> and selecting “Folders” and “St. Clair Ethanol”.**

Workers must arrive at the Suncor St. Clair Ethanol Plant fully trained and competent to perform their work scope, with associated documentation available for review upon request.

If there are any questions or concerns regarding any safety or environmental requirements, please contact the EH&S Department.

Suncor’s Key Beliefs

Suncor is committed to a culture of operational discipline, which is foundational to achieving safety, environmental, and health and wellness excellence. All individuals who conduct work on behalf of Suncor are asked to adhere to and apply the following beliefs in their day-to-day activities:

1. All incidents can be prevented. Strong hazard identification is imperative to seeking and controlling hazards before they result in an incident.
2. To work here, you must be committed to working safely
3. Environmentally responsible operations are essential to our success. It is important to plan your work with consideration and controls for environmental impact. **All leaks and spills must be reported to the Control Room and cleaned up immediately.**

Suncor’s Journey to Zero

The Journey to Zero initiative is about elimination of all occupational injuries and illnesses. Suncor asks for your commitment to ensure that all contractors and employees are aware of and support this goal. Zero injuries and illnesses are possible, and Suncor asks for your commitment, dedication, and determination to make this happen.

Life Saving Rules

In conjunction with the Journey to Zero, Suncor has developed six (6) Life Saving Rules that are of the utmost importance. These rules align with International Oil and Gas Producers (IOGP) standards, which are an internationally recognized set of rules that are standardized across the globe. Life Saving Rules have been established to ensure the safety of the worker and everyone around them by addressing the highest risk work activities. **Violation of any Life Saving Rule may endanger workers and could potentially result in a serious injury or fatality.** Adhere to the Life Saving Rules at all times. At Suncor, we care our fellow workers too much not to intervene when a Life Saving Rules is violated. Contracting companies are required to provide supervision to all subcontractors at all times, and must audit and ensure subcontractors meet all outlined requirements.



If you have any questions regarding the Life Saving Rules and how they apply at our site, please contact your supervisor and/or Suncor contact before executing any work.

SIF Precursors

Serious Injury or Fatality precursors are potentially hazardous situations that require additional rigour and evaluation when developing and implementing controls. If a SIF precursor is part of a work activity and management controls are either absent, ineffective, or not complied with – the situation could reasonably result in a serious injury or fatality. It is important to evaluate your work to determine which, if any, SIF Precursor(s) is (are) part in your work activities and take the time to ensure controls are in place to eliminate and/or mitigate the hazards. These controls should be documented on your safe work permit and/or hazard assessment document (i.e. TASC Card)



Operational Discipline

Suncor has outlined five (5) operational discipline behaviors’ that we strive to apply to our day-to-day activities in order to achieve operational excellence and continue to reduce risk. The Suncor St. Clair Ethanol facility requests that all workers be aware of, and apply these behaviors’ as well.

Seek Knowledge and Understanding –

Understand not just what you do, but why you do it. Continually seek greater knowledge about the systems, processes, and hazards in and around the workplace.

Adhere to Procedures –

Do not take or tolerate shortcuts. If the procedure is incorrect, communicate this to your supervisor and any potentially affected workers so that it can be updated.

Use a Questioning Attitude to Surface Problems –

Constantly ask yourself what could go wrong. Check for out of the ordinary conditions and learn to anticipate potential problems. Do not assume things are okay – verify.

Expect Accountability –

Hold others accountable and expect them to do the same. Back up co-workers by looking out for what they may have missed. Intervene and stop an operation when necessary.

Collaborate –

Determine who you need to work with for the best results. Ask who else can add value and work together to share knowledge and understanding.

Training Requirements

“Competent Person”

The definition of a “Competent Person” as established in the Ontario *Occupational Health and Safety Act* section 1, is a person who “...1) is qualified because of knowledge, training and experience to organize the work and its performance, 2) is familiar with this *Act*, and the regulations that apply to the work, and 3) has knowledge of any potential or actual danger to health or safety in the workplace.”

Training Requirements at the Suncor St. Clair Ethanol Plant

Any individual who will be conducting work at the Suncor St. Clair Ethanol Plant must have a valid Site Safety Orientation prior to commencing any work – and any other site specific training related to site standards that may apply to their work. Site Safety Orientation is valid for one year from the date of completion. To coordinate a Site Safety Orientation for any and all workers, contact the site **Training Coordinator, Megan Renaud, by phone at 519-481-0454 ext. 308 or by email at merenaud@suncor.com.**

All workers who will be attending the Suncor St. Clair Ethanol facility must be competent to perform the agreed to work scope and have valid training for the work they will be executing or be affected by. Valid training is considered to be any training provided by a certified trainer that is documented, and has an expiration date that has not been surpassed. In the event that a training certificate does not specify an expiration date, the St. Clair Ethanol facility will not accept anything that has exceeded three (3) years since its issuance, or for which relevant legislation defines an expiry/refresh cycle.

Ahead of any work being completed, copies of training certifications for affected employees must be forwarded to the site **Training Coordinator, Megan Renaud by email at merenaud@suncor.com.**

Hiring supervisors are responsible for ensuring all employees are competent to perform the work required of them, and have the applicable certifications prior to arriving at the Suncor St. Clair Ethanol facility.

Any questions regarding training requirements may be forwarded to the site **Training Coordinator.**

Emergency Procedures

The St. Clair Ethanol Plant has six (6) Emergency Assembly areas. Refer to Suncor.com for map of Emergency Assembly Area Locations. Copies are also posted throughout the plant, and inside contractor lunchroom trailers. It is recommended that when workers arrive at their job site, that they conduct a cursory examination of the Emergency Assembly Area locations in relation to their area, as well as looking for the nearest windsocks (orange). This practice will save time during an emergency.

The Suncor St. Clair Ethanol facility tests their emergency alarm system every Monday at 12:35 PM. A fire alarm system is used for evacuation; in addition to CO₂ alarms (refer to Suncor.com for map of alarm locations). All alarms are to be treated the same with the following procedure followed:

- STOP work
- Turn off all sources of ignition (including golf carts or other vehicles)
- Establish a safe route to an assembly area (determining your location to the emergency, and wind direction)
- Report to the safest assembly area
- Identify yourself to the Area Warden

NOTE: Contractor supervisors are responsible to conduct a head count for their workers and report any missing personnel. Reports are made through the Area Warden.

During an emergency, all permits are cancelled, and until an “all clear” has been issued workers must follow the emergency procedure. Workers must remain in their assembly area unless directed otherwise by site personnel. Once an “all clear” has been communicated, permits will be re-issued following the inspection of the necessary area(s)/equipment and it is safe for work to commence.

Personal Electronic Devices

The use of cell phones, or any other personal electronic devices, throughout the hazardous process areas of the Suncor St. Clair Ethanol facility are prohibited. The uses of these devices are permitted in the Administration Building, the external parking lots, and contractor trailers **only**. Cell phones may not be used in vehicles, except when parked along the exterior roadway. All personal electronic devices must be turned off (not on silent or vibrate mode) within the hazardous process areas. All contractors shall leave their cell phones, iPads, etc. inside their lunchroom trailers at all times. The use of any of these devices is not permitted inside the designated smoking areas onsite. Bluetooth headsets, etc. are to only be worn in the aforementioned permitted areas.

Watches with messaging capabilities (i.e. fitness trackers) are permitted; however, they should not be worn when completing work as they can become a distraction or can become caught in rotating equipment.

Vehicle Use

Vehicles that will be accessing the St. Clair Ethanol facility (beyond the main gate) must be clearly marked with company identifiers and **must be insured with a minimum of \$2-million in commercial liability**. Personal vehicles shall not be onsite within the gated area. All personal vehicles are to be parked in the North Parking Lot (gravel parking lot), and must be backed into the parking space.

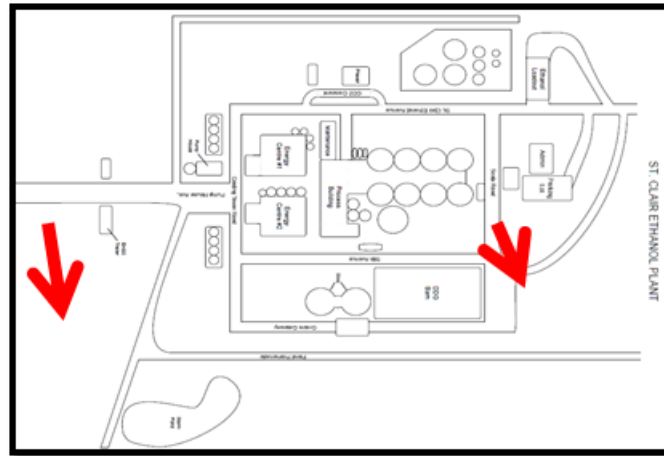
Vehicle parking within this process area(s) will not be tolerated. Contractors are to park vehicles within identified areas only. If a company vehicle is not necessary to the job, it must be parked in a designated parking area. During Turn Around activities, the Suncor St. Clair Ethanol facility requests that contractors reasonably limit the number of company vehicles onsite. All vehicles must be backed into parking spots, whether it is within the gated area or not.

All vehicles that are parked onsite must never block any intersection within the plant and shall be left with the key in the ignition and the door unlocked. This is for emergency purposes as it may be necessary for a vehicle to be moved to accommodate emergency vehicles should the situation arise.

Designated Smoking Areas

There are two (2) designated smoking areas at the Suncor St. Clair Ethanol site. These areas are the only areas in which smoking will be permitted. **There will be no smoking anywhere else on site (including inside vehicles and in the parking lots). All cigarettes, matches and butane lighters are not permitted in the process area and must remain in contractor lunchroom trailers.** All personal protective equipment

must be worn inside the designated smoking areas (i.e. fire retardant clothing, hard hat, safety glasses, and safety boots). The smoking areas are not designated lunch areas, therefore eating and drinking in these areas are not permitted. Cell phone use within the designated smoking areas is also not permitted; these areas not break areas and shall not be treated as such.



Locations:

1. Located north of the scales and east of the Change House – there is a sign stating “Designated Smoking Area”. **Full PPE must be worn inside of smoking area #1.**
2. Located south of the EH&S Trailer at the south end of the plant near the contractor lunchroom trailers – there is a sign stating “Designated Smoking Area”.

First Aid Kits

First Aid kits and Automatic External Defibrillators (AED) are available throughout our site; contractors shall familiarize themselves with the location of kits/AED’s/Safety Showers in relation to their work area. Should an item be removed from a First Aid kit, the enclosed form must be filled out in addition to an Incident Report Form. Incident Report Forms may be picked up, and dropped off in the Control Room. Alternatively, your Suncor contact can provide you with the site Incident Report Form upon request.

In the event of an onsite emergency, or offsite medical attention is required, notify the Control Room immediately by radio or by phone at **extension 245**.

WHMIS

All workers attending the Suncor St. Clair Ethanol site must be trained in the Workplace Hazardous Materials Information System (WHMIS) prior to their arrival onsite in accordance with *O. Reg. 860 Section 6-7*. The Suncor St. Clair Ethanol facility reserves the right to request proof of certification at any point. Prior to the commencement of any work, all workers must understand and be able to identify the hazards associated with any material they may be in contact with.

Material/Safety Data Sheets (M/SDS) for materials at the Suncor St. Clair Ethanol Plant are kept in an electronic database on Suncor's *The CORE*. Physical copies can be made available upon request from your Suncor contact. Anything that is brought onto the Suncor St. Clair Ethanol site that requires a M/SDS must be submitted to your Suncor contact, who will initiate the chemical approvals process. A copy must be made available for our site records and to ensure workers are able to access a copy upon request.

WHMIS controlled substances must be vetted prior to use at our site for hygiene, safety and environmental considerations and risks by the Suncor EH&S Department, before being approved. As such, materials may not be approved for us as part of this review process, and contractors will be notified accordingly. In the event that a material approval request is denied, contractors will not bring the affected material to the Suncor St. Clair Ethanol site and must select an alternative material for use - subject to approval via the review process.

Designated Substances

The Suncor St. Clair Ethanol facility has 4 designated substances on -site. Please familiarize yourself with the assessments (and associated control standards where applicable. Should your work scope involve the potential disturbance or interaction with a designated substances, additional procedures and safety precautions will be established and communicated with all affected workers.

- Benzene – *19000-026 Benzene Assessment*
- Silica and/or Refractory – *19000-015 Silica & Refractory Standard*
- Mercury – *19000-020 Mercury Assessment/19000-021 Mercury Control*
- Lead – *19000-019 – Lead Assessment*

For a detailed look at the location, and controls of each of the designated substances please familiarize yourself and your workers with the above listed standards on the Suncor website (see: Introduction).

Fit For Duty

All workers must arrive at the Suncor St. Clair Ethanol facility in a state that is considered fit for duty. It is the responsibility of the worker to inform their supervisor of any prescription or over-the-counter medication they are taking that could have the potential to impact the work they are doing. The employer/supervisor is responsible to report any deviation from the fit for duty requirements to their Suncor contact, and to execute incident follow up as per the contractor's existing protocols (including any testing as required). Should an incident involving a contractor be identified by Suncor St. Clair Ethanol personnel, the incident will be reported to the supervisor, at which time the supervisor is responsible to initiate follow-up as outlined by the contracting company's existing policies and procedures. All contracting companies must have an established Drug & Alcohol Policy that either meets or exceeds that of the Suncor St. Clair Ethanol Plant.

Personal Protective Equipment

The following is a list of **minimum** personal protective equipment (PPE) that is required at the Suncor St. Clair Ethanol facility. Additional PPE may be required as a result of the work activities conducted at the site and the contracting company is responsible for identifying (in consultation with Suncor representatives) and providing additional PPE (i.e. respirators, fall arrest equipment). **All PPE must be maintained in proper working condition.**

- Fire retardant clothing
- Hard hats **must be worn brim-forward**
- Safety glasses with side shields
- Work boots must be CSA-approved (“green patch”) that are a minimum of 6” in height and have a defined heel
- Hearing protection in designated areas (**Appendix E for locations**)
- High-visibility vests must be worn when working alongside moving equipment or roadways
- Gloves must be worn as needed and must be appropriate for the task

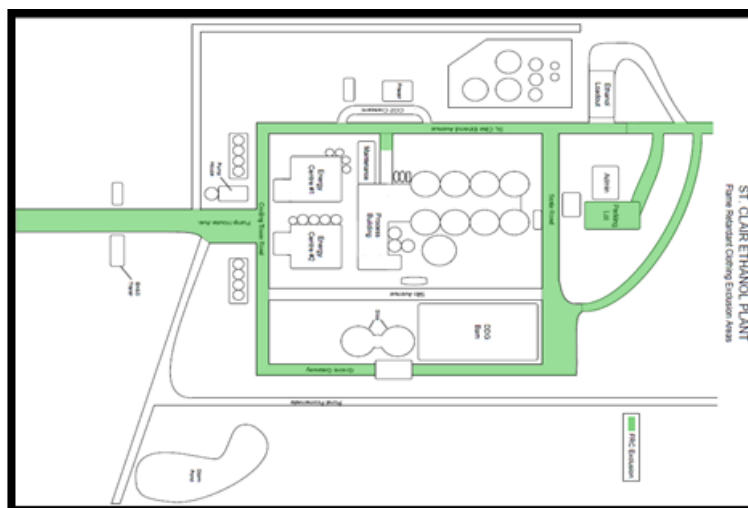
All PPE requirements are in effect until workers are south the EH&S Trailer at the south end of the plant (located in front of the contractor lunchroom trailers).

Fire Retardant Clothing

Fire retardant clothing must be worn at all times by personnel within the hazardous process area (see below). All outer-layers **must** be entirely fire retardant, free from any damage (i.e. holes, tears, etc.) that would impede the effectiveness of the clothing. Non-fire retardant clothing cannot be exposed at any point.

Non-Fire Retardant Clothing Zones

To permit the passage of contractors from the entrance of the plant to their trailers, and vice-versa, the perimeter roadway is a designated non-FR zone. This zone is exclusive to the paved perimeter roadway and the gravel roadway at the south end of the plant that leads to the contractor trailers (refer to Appendix F for a map). Workers are permitted to refrain from donning their FR clothing in these zones; however, workers must still wear **long sleeves and long pants, hard hats, CSA-rated work boots, and safety glasses**. Workers must remain solely in these designated zones while not wearing FR clothing, and cannot deviate from this path at any point.



Hard Hats

Hard Hats must be CSA-approved and be worn in forward-facing position at all times. Exception: when welding activities require the hard hat to be worn backwards, a reversible hard hat (showing the CSA reverse orientation mark) must be worn, and upon the completion of welding activities must be worn in the forward facing position.

Hard hats must be in good working condition, free from any damage or defects that would impact its effectiveness. It is recommended that hard hats are replaced every five years, or at the first sign of damage. Baseball caps or the like cannot be worn under hard hats as it may impact the effectiveness of the suspension.

Work Boots

Work boots must be CSA-approved with the “green patch”. They must be a minimum of 6-inches in height and have a defined heel. Work boots should be in good working condition, free from any damage or defects that will impact its effectiveness.

Hearing Protection

Hearing protection is required throughout the site, with signs posted throughout the facility (refer to Suncor.com for map of hearing protection areas). The Suncor St. Clair Ethanol site provides disposable ear plugs at the entrance doors to the process buildings. During Turn Around activities **hearing protection requirements remain in effect**, no exceptions will be tolerated. Hearing protection to specific work activities being conducted onsite must be assessed by the Contractor Supervisor, in addition to the minimum requirements outlined by Suncor. Note: impact noise must be considered in addition to equipment noise as it has the potential to impact the level of protection required by the Ontario Ministry of Labour.

Respirators

All contractors must possess the appropriate personal protective equipment and tools for the work that they will be conducting, including respirators. Should there be a potential to don a respirator as part of work activities, contractors must arrive onsite with a valid respirator fit test and the appropriate supply of respirators prior to commencing work.

All contractors must be clean shaven prior to accessing the site should there be a need to don a respirator, at any time, to support any part of the work scope.

Contact Lenses

The use of contact lenses at the Suncor St. Clair Ethanol site is permitted; however, they must be used in conjunction with the appropriate safety eyewear (i.e. monogoggles or safety eyewear). The Suncor St. Clair Ethanol site EH&S Department recommended the use of prescription safety eyewear as an alternative to contact lenses. Refer to **19000-026 Contact Lenses Standard** on Suncor.com.

In addition, there shall not be any loose articles of clothing or jewelry (i.e. necklace, bracelet). Workers shall tie back or tuck in any long hair. These articles can become caught in rotating equipment or in pinch points. It is recommended that workers refrain from wearing rings. **Exception: no worker shall wear any piece of conductive material (rings, etc.) while executing any electrical work.**

Safe Work Permit

Adherence to the safe work permit is one of Suncor's Life Saving Rules. A safe work permit must be obtained for all work activities at the site and the requirements/controls outlined during the safe work permit issuance (and any supporting documentation) will be followed at all times (refer to Suncor.com for a Safe Work Permit example). Safe work permits are issued for cold work, hot work, confined space entry, and excavation work activities. The safe work permit must remain at the job site at all times, and be available for review upon request.

During the safe work permitting process it is imperative that the permit issuer and permit receiver(s) clearly communicate the entire work scope and hazards that may be present in the workspace (as well as the controls put into place). If necessary, a job walk is recommended to identify and communicate all aspects of the job.

It is the contractor supervisor's responsibility to ensure the content of the safe work permit is communicated and clearly understood by all affected personnel before work is initiated. All workers involved in the job must sign onto the safe work permit as a permit receiver. The contractor supervisor is required to ensure the safe work permit is adhered to **at all times**.

Confined Space Entry

All contractors who may be involved in a confined space entry (CSE) must have current certification in Confined Space Awareness, Working at Heights, Respiratory Fit Testing; and, in addition, be trained to execute hazardous energy control procedures(lock out). All contractors must possess a personal identification lock and tag, and these must be placed on the securing device for the space. Additional space specific training may be required, for example Spark Watch training. Refer to **19000-001 Confined Space Standard** on Suncor.com for additional information.

Entrants shall be familiar with the Assessment of the Confined Space and the Rescue Plan specific to that space. No entry will take place without an initial gas test, an attendant present and a means of communication with the Control Room (i.e. radio) must be present. Communication must be maintained between the entrant and attendant at all times. If communication cannot be maintained through line-of-sight or verbally, then a radio must be utilized for the duration of the entry. All confined space entries at the Suncor St. Clair Ethanol Plant require the use of a fall protection harness by the entrants to facilitate rescue, should it become required.

Contracting companies that are involved in confined space entry will receive two documents from the Suncor St. Clair Ethanol site prior to the scheduled work. The Confined Space Assessment & Planning Form

(Appendix H) and Confined Space Assessment & Planning Coordination Form (Appendix I) will be sent electronically to the contractor supervisor or designate.

Working at Heights

All workers who will be conducting work at height must have been trained by a Ministry of Labour approved Working at Heights training course. For all workers who will be working at heights, contractor companies shall submit their relevant training records to the site Training Coordinator (see Training Requirements). Refer to **19000-028 Working at Heights Standard** on Suncor.com for more information. A worker must ensure that a fall protection system is utilized when work is to be conducted at height, where there is a potential of:

- Falling more than 1.8 meters (6 feet), or
- Falling into operating machinery, or
- Falling into water or other liquid, or
- Falling into or onto a hazardous substance or object, or
- Falling through an open work surface.

The contractor is required to provide a CSA-certified fall arrest device that must be utilized by the worker (following a pre-use inspection), and must prevent the worker from falling greater than 1.8 meters (6 feet) with less than 1,800 pounds of force (consideration for pendulum forces, etc. must also be evaluated). This may require the use of shock absorbing and/or retractable lanyards. The device must be inspected before each use and annually, these inspections must be made available to the Suncor St. Clair Ethanol Plant upon request.

Employers must provide a written rescue plan that may be implemented forthwith and allows rescue in **less than 15 minutes** (less than 5 minutes is recommended) for any activity that requires a worker to wear a fall arrest device. The rescue plan may be documented on the permit, TASC card, or another appropriate means that your company has, and it must be clearly communicated to all of those affected.

Dropped Objects

Dropped objects are one of the most prominent SIF precursors. Dropped Object Hazards typically result from; poor communication, a lack of signage or warning re: work overhead, failure to secure the area below, and poor housekeeping.

Contractors must fully understand the hazards associated with work at height, utilize barricades, signs, and verbal warnings as needed. Tools and equipment must be properly secured when working at heights; the Suncor St. Clair Ethanol site recommends the use of tool lanyards and toe-boards wherever practicable.

Contractors must practice good housekeeping when working at heights and radios must be properly secured through either a holster or a belt strap. Contractors must consider the treatment of work surfaces and handrails as well when working at heights (i.e. plywood, mesh netting, etc.) where it does not introduce another hazard.

When working at heights, a hazard analysis must be conducted (TASC card and safe work permit) to identify the hazards associated with the work and determine the controls necessary to ensure that the potential fall hazard and dropped objects/unsecured objects at height hazards are eliminated, isolated, and/or fall restraints are in place to ensure the work can be performed safely.

Mobile and Lifting Equipment

Prior to use, workers must have a valid license, utilize fall protection and tie off to an engineered tie point when utilizing elevated work platforms. Workers must also have a documented rescue plan, be familiar with this rescue plan, and a means of communication with Operations must be present.

Per the Ontario Regulation 213/91 Construction Projects:

147.(1) "A worker who operates an elevating platform shall, before using it for the first time, be given oral and written instruction on the operation and be trained to operate that class of elevating work platform."

All operators must also perform a documented pre-work inspection and these inspections must be turned in to their supervisor when the job is complete. These inspections must be made available to the Suncor St. Clair Ethanol site upon request.

Hazardous Energy Control

All contractors involved in and/or affected by hazardous energy control activities shall review the [19000-022 Hazardous Energy Isolation Standard](#) located on Suncor.com. The competent contractor must review the isolation, and if approved, all workers involved shall apply their personal lock and tag. All contractors must have their own lock and identification tag, and they must be deemed competent. The Suncor St. Clair Ethanol facility expects that all individuals associated with the work involving hazardous energy will apply their lock/tag, no exceptions will be tolerated.

Once executed, hazardous energy isolations must remain in place until the completion of the individual's work on the system – not the end of the work day. As a result, personal locks may be required to remain in place for several days in some circumstances. It is the duty of the contracting company to supply an adequate number of locks/tags for their workers.

All workers involved in and/or affected by hazardous energy control must be competent to perform the work in compliance with all regulatory requirements. The contracting company must have a hazardous energy control standard that meets or exceeds that of the Suncor St. Clair Ethanol facility. All workers performing work involving hazardous energy control must be trained accordingly.

Tools and Equipment

The Suncor St. Clair Ethanol site requires that all contractors and supervisors arrive at the site with the appropriate tools and equipment required to perform their task. These tools and equipment must be maintained and inspected as per manufacturer's requirements and/or the *Occupational Health and Safety Act* (OHSA) and/or other applicable legislation.

Contractors, and their supervisors, are responsible for all their tools and equipment (i.e. gas testers, respirators, etc.). All equipment must have current certification, where applicable, and be in good working condition. The Suncor St. Clair Ethanol site reserves the right to request any applicable inspection forms at any time.

Workers that will be using necessary equipment for their work scope must be competent in the safe and proper use, and this competency must be documented. This documentation must be made available to the Suncor St. Clair Ethanol site upon request.

The use of modified equipment or tools at the Suncor St. Clair Ethanol site is prohibited.

Grinding

All workers who are conducting any grinding onsite are required to contain sparks wherever practicable. At a minimum, fire blankets are required; however, an upgrade to shrouding may be necessary when the location and work scope demands it.

Craning and Rigging

All workers that will be operating craning and rigging devices must be trained in the proper and safe use. This training must be current, with an expiration date, and must be documented. Submit all necessary training records electronically to the Training Coordinator at merenaud@suncor.com.

Contractors must conduct pre-work inspections of all craning and rigging devices. These devices shall be documented, signed, and returned to their foreman once the work is complete.

Radios

Radios will be available for sign out in the SCEP Permit Trailer. At a minimum, all contractor supervisors must be in possession while onsite. Work scope will determine the need for a radio to support work activities (i.e. confined space entry, working at height). Any questions regarding radio use can be forwarded to your Suncor contact.

Contractors must use either a holster and/or belt or strap to properly secure their radio(s). By properly securing a radio, the risk of become a dropped object hazard has been mitigated. When working at height all radios must be secured or the job will be stopped.

Safety Reporting

Incident Reporting

Contractors must report all incidents (minor or major) immediately to the Control Room (by radio or calling extension 245). Incidents may be reported using the Suncor St. Clair Ethanol Incident Report Form or by using the contractor company's own version (note: the contracting company's must meet or exceed that of Suncor's).

It is imperative that all incidents, near-misses, and hazardous conditions are reported immediately to the Control Room. This will ensure that root causes are properly identified and addressed in a timely manner to protect everyone's safety. Reporting is imperative as it will help to prevent event reoccurrences.

Near Miss (Incident No Loss) Reporting

All near-misses (incident no-loss) and hazardous conditions may be reported on the Near Miss Report Form. This form may be picked up and dropped off in the Process Area Lunchroom and should be submitted as soon as reasonably practicable. When reporting near misses and hazards, workers may remain anonymous and are welcome to utilize their company's own forms.

Job Safety Analysis

A Job Safety Analysis (JSA) outlining potential hazards present at the worksite and controls implemented should be completed by the contractor and reviewed with the Suncor contact as part of work scoping activities **before** work begins at the site.

This information may be documented on a Task Analysis Safety Cards (TASC) – which can be provided to you by your Suncor representative. It is the supervisor's responsibility to ensure the hazards associated with a job that is to be executed have been identified, controlled and communicated to all workers involved. Per the *Occupational Health and Safety Act*, **all workers must have been given the tools and knowledge to properly identify hazards in any and all workplaces.**

The use of TASC cards provides an opportunity for all individuals associated with a job the appropriate time to discuss the steps that will be taken to complete the job, the hazards that are associated with the job, and the controls that have been established to mitigate these hazards.

Tool Box Talks

All contractors must provide, and ensure all workers participate in, documented Tool Box Talks prior to the beginning of each work shift. Tool Box Talk topics must be a meaningful discussion regarding hazards in the workplace. For further information or support regarding topics - please contact your Suncor contact.

Safety Observations/Audits

Contracting companies are required to perform regular safety observations/audits in the field ensure all EHS standards and regulatory requirements are being adhered to – while identifying opportunities for improvement. The contracting company must have an existing safety observation/audit program (ex. Observation Based Safety). As part of its Contractor Performance Program, the Suncor St. Clair Ethanol site requests copies of completed safety audits to be submitted to your primary Suncor contact.

Environmental Requirements

Waste

Any and all waste materials generated by contractors at the Suncor St. Clair Ethanol facility shall be managed in compliance with all applicable regulatory requirements and best practices during generation, handling, storage, sampling, through to final disposal.

All waste materials must be placed in an approved container (supplied and inspected by the contractor company), labelled and **sampled** (in compliance with TDG and provincial legislation) prior to transport and removal from the site to ensure appropriate waste classification, transport containers, transport labelling, carrier approvals and final receiver approvals are provided for the waste stream.

All contractors are responsible to submit waste records to the Suncor Environmental Advisor, **Rheece DeVeyra (519-481-0454 ext. 241 or rdeveyra@suncor.com)**.

General refuse and recycling bins do not require sampling; however, visual inspection must occur prior to transport to ensure that only appropriate materials have been placed in the bins.

Any material(s) that is returned to the Suncor St. Clair Ethanol process following turnaround activities are deemed to be products and not waste materials.

Contact the Suncor Environmental Advisor (contact information listed above) for information regarding temporary waste storage containers during turn around activities.

No waste materials generated by contractor activities shall be disposed of on-site. Waste materials are to be removed from site as soon as practicable. Storage beyond 60 days is not permitted at the Suncor St. Clair Ethanol facility.

Subject wastes (i.e. hazardous, industrial liquid, contaminated soils, etc.) generated by the contractor for off-site disposal must be sampled, analyzed, characterized, classified, and **must be registered with the Suncor Environmental Advisor with the MOECC (HWIN)** prior to being sent to an approved off-site disposal facility. The Suncor Environmental Advisor will generate Part 2A and, if required, 2B forms, as well as the Transportation of Dangerous Goods Proof of Classification and Certification. The applicable documents will be provided to the waste transporter and receiver. Lastly, the Suncor Environmental Advisor will ensure information documented on Part A of the Ontario waste manifest (provided by the transporter) is accurate and complete. **Waste manifests must be signed by a Suncor employee with current Transportation of Dangerous Goods training and be accompanied by appropriate documentation (i.e. waste profile, consignor certificate, MSDS).**

Note, all equipment (i.e. hoses, valves, exchangers) sent for offsite inspection and/or maintenance must be cleaned of any residual material **prior** to transport. If residual material cannot be removed – the equipment must be appropriately wrapped and labelled for transport to ensure no material is discharged during transport, and that the receiver is aware of the residual material (last contained information).

Soils

All excavations or soil disturbance activities require that a Safe Excavation Request Form be completed in advance of these activities being permitted via the site safe work permit process.

Hydro-vacuumed soils and/or contaminated soils are subject wastes and may not be stored or re-used onsite.

If the contractor identifies potential contamination of soils – the contractor is to stop work activities in the area, notify the control room and engage the Suncor Environmental Advisor to support follow-up sampling and handling activities.

Water

Any water that has come into contact with the process or a contaminant is not to be directed to the St. Clair Ethanol facility's Storm Water Management Pond.

The Suncor Operations Manager must be engaged and provide approval for any materials that are intended to be returned to the process.

Spill Prevention and Containment

For contractor supplied materials approval process, please see the aforementioned MSDS section.

The contractor must be competent in the transportation, handling, use, storage and disposal of any controlled product being brought onto the site by the contractor.

Materials brought on-site by the contractor that cannot be consumed by the process (i.e. non-consumable) and are considered residual after the contractor's activities are completed, are to be removed from the site by the responsible party.

Noise

Equipment provided by the contractor for the purpose of operation on the site, that has the potential for emitting excessive noise, high vibration or frequency, shall be equipped with appropriately designed and/or engineered equipment or appurtenances for the purposes of minimizing excessive noise, vibration, or frequency.

END OF PROCEDURE

| REVISIONS | | | |
|-----------|----------------------|-----------|--------------------------------------|
| No. | Date (mm/dd/yyyy) | Author | Description |
| 0 | 04/05/2017 | L. Nauta | Created |
| 1 | 08/11/2017 | M. Renaud | Smoking Area and PPE section updated |
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