



SAFE WORK PERMIT

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SCOPE AND PURPOSE

The purpose of this document is to define in detail the Safe Work Permit (SWP) and associated process(s), in order to support the clear documentation of work scope, systematic/effective identification of work scope hazards, implementation of hazard controls, and communication of hazards/required controls – prior to and during the execution of work in compliance with regulatory requirements.

The scope of the SWP program applies to all work environments at SCEP – with roles and responsibilities described within, to all SCEP employees, contractors, sub-contractors, consultants and agents of SCEP and any deviation to this standard requires approval through the SCEP Management of Change Process.

ROLES AND RESPONSIBILITIES

Environmental, Health and Safety Team Lead -

- Support the development and maintenance of the Standard in compliance with regulatory requirements
- Support the implementation of the Standard
- Oversee coordination of training of employees
- Assist with the maintenance of records and documents pertaining to this standard
- Ensuring that non-conformances with the Standard and/or the law, are subject to appropriate corrective action
- Support monitoring the effective implementation of this Standard through the Observation Based Safety (OBS) program and procedural audits

Suncor Contact (Discipline Managers or Personnel Responsible for Sourcing Work) -

- Accountable to ensure that hazards associated with the work are identified and associated controls have been evaluated through the work planning process and review of all applicable standards, and are implemented through the SWP process
- Assist the identification of the detailed work scope
- Accountable to ensure the development of adequate controls measures and procedures to eliminate the potential for hazards associated with work scopes
- Responsible to ensure all workers are provided with appropriate equipment to support the safe execution of work
- Accountable to ensure workers under their supervision are trained and able to identify hazards and apply controls – along with completion of required documentation (FLHA or equivalent document, etc.)
- Accountable to ensure all workers understand and are able to apply and adhere to the SWP process
- Ensuring that non-conformances with the Standard and/or the law, are subject to appropriate corrective action
- Support monitoring of effective implementation of Standard Through the Observation Based Safety (OBS) program and procedural audits

Operations Manager -

- Ensure Operations Staff identified as competent to Permit Issuers have; current certification in the affected area of the plant, current hazard identification training, and a full understanding of this standard and associated contents
- Provide Operations technical oversight when implementing the standard and other associated standards (i.e. Working at Heights, Confined Space) to support the safe execution of work
- Ensuring that non-conformances with the Standard and;/or the law, are subject to appropriate corrective action

- Support monitoring of effective implementation of Standard through the Observation Based Safety (OBS) program and procedural audits

Permit Issuer -

- Confirm that the area/equipment affected by the work has been prepared in compliance with all applicable Safe Operating Procedures (SOP's), Safe Work Practices (SWP), legislative requirements and other relevant documents
- Confirm that work planning and hazard assessments required to support the scope of work have been completed, documented and communicated
- Works collaboratively SME's and the Permit Receiver to confirm scope of work (including concurrent work, adjacent work, SIF precursor(s) and process impacts), reviews and/or develops hazard mitigation plans and ensures all applicable safe work practices are integrated as required
- Ensures that the conditions of the permit and the scope of work are understood by the receiver
- Must be aware of extinguisher types versus hazard (i.e. water extinguisher for grains dust versus ABC Extinguisher for LEL area)
- Ensures emergency response assembly areas and windsocks are discussed and identified – along with communication plans
- Conducts (or delegates) all pre-requisite tasks (i.e. gas testing, field verification of equipment/work location, field verification of isolations, etc.) prior to issuing a permit
- Ensure a radio is issued for the work site to allow for communication with Operations
- Conducts (or delegates) regular field checks to review work area conditions, identify emerging hazards and ensure compliance with the permit
- Prior to permit close-out, confirms work scope completion in compliance with the permit, housekeeping activities, and the safe condition of work site
- Ensuring that non-conformances with the Standard and/or the law, are subject to appropriate corrective action
- Support monitoring of effective implementation of Standard through the Observation Based Safety (OBS) program and procedural audits

Permit Receiver –

Note: Permit Receiver must be onsite and physically supervising the work

- Provides a detailed description of the full scope of work including (but not limited to) –
 - The tools and/or equipment being used to perform the work
 - Resources required to execute the work scope
 - Hazards, work methods, and the associated impacts they may have on process equipment, personnel, etc.
 - Approximate timeline and duration of work
 - All required documentation (training certificates, fall rescue plans, etc.)
- **Utilized the Field Level Hazard Assessment (FLHA (or EQUIVALENT DOCUMENT)) or other equivalent document to detail and communicate the work steps, associated hazards and proposed controls**
- Understand the work to be executed and ensure workers are competent and have all current required qualifications
- Maintain work awareness of, and make available, all applicable SOP's, SWP or policies relevant to the work
- Verify all energy isolations in the field in consultation with operations
- Assume the duties and responsibilities of a supervisor as defined in the OSHA and provide direct supervision to the work site and monitoring conditions on an ongoing basis

- Assign a contact for each job if supervising more than one job at a time
- Verify the hazard assessment and controls associated with the permit comprehensively control the hazards associated with the work prior to signing the permit
- Ensure all workers are aware, understand and implement the contents of the SWP, required controls and are working in compliance with the permit at all times
- Stop work and notify operations if conditions and/or scope change such that the work is no longer within the scope of the permit or hazards are not properly defined. Work with Operations to update the permit as required
- Ensure all controls identified on the permit are implemented and that workers are aware of the emergency assembly area and wind sock locations – as well as equipped with a radio for communication purposes at all times
- **Is accountable for headcount of workers in the event of an emergency**
- Ensures a copy of the permit remains at the work site at all times
- Ensure the job site is rendered safe prior to the beginning work and any time the work site will be left unattended
- Following the completion of the work, verifying the work area is clean, organized and equipment has been left in a safe condition prior to returning at least one copy of the permit and all associated documentation to the Permit Issuer and signing off. The Permit Receiver is responsible to communicate the close out of the permit to all affected workers

All Workers –

- Complete required training (i.e. Hazard Recognition) and apply knowledge to the work
- Perform a pre-use inspection on all equipment before use and assure that equipment is used in compliance manufacturer and regulatory requirements
- Understand the work to be executed and are competent and have all current required qualifications
- Maintain awareness of all applicable SOP's, SWP or policies relevant to the work
- Verify all energy isolations in the field in consultation with Operations
- Verify the hazard assessment and controls associated with the permit (FLHA or equivalent document where applicable) comprehensively control the hazards associated with the work prior to beginning work
- Ensure awareness, understanding and implementation of the contents of the SWP and associated documentation, required controls and work in compliance with the permit at all times
- Stop work and notify your Supervisor/Operations if conditions and/or scope change such that the work is no longer within the scope of the permit r hazards are not properly defined. Work with their Supervisor/Operations to update the permit as required
- Ensure all controls identified on the permit are implemented and maintain awareness of the emergency assembly area, wind sock locations, head count responsibilities (i.e. ensure Supervisor is aware of their assembly location) – as well as ensure at least one worker in the area is equipped with a radio for communication purposes at all times
- Ensures a copy of the permit remains at the work site at all times
- Ensure the job site is rendered safe prior to the beginning work and any time the work site will be left unattended
- Following the completion of the work, verifying the work area is clan, organized and equipment has been left in a safe condition

Spark Watch –

- Must have current fire extinguisher training and be aware of extinguisher types and be competent
- Ensure spark mitigation equipment is available and in-use at the work location (extinguishers, fire blankets, etc.)
- Dedicated to continually monitoring, evaluating and controlling potential spark/heat hazards
- Equipped with a radio
- Must have current gas test training and be competent
- Must be familiar with controls to manage combustible dust hazards, as well as atmospheric hazards
- Remain in the work location to monitor for combustion hazards for 30 minutes following the completion of the work

WORK INITIATION AND PLANNING

The identification of the need for work to occur within the confines of the SWP process in a number of ways at the St. Clair Ethanol facility, often well in advance of the actual work execution (i.e. MAPCON work request, process improvement suggestions, incident investigation, Joint Health and Safety committee, project work, etc.)

For each work scope, there is a Suncor Contact (Suncor Energy Inc. employee that requested, supported and/or commissioned the work). The Suncor Contact is to be identified to support work planning process in advance or permitting activities and support work prioritization and scheduling in consultation with Subject Matter Experts (SME) – as well as to provide any clarification and/or documentation updates required by the Permit Issuer following the review of the scope of work (and any associated documentation) with the Permit Receiver at the onset of the permit issuing process.

As part of planning activities, identification of work steps (full scope), associated potential hazards, as well as controls to be implemented to eliminate or control hazards are required. There are a number of processes that support the aforementioned steps that are utilized in various combinations. The Safe Work Permit helps to identify key documents based on the risk and complexity of the work.

For **basic permits** only, the scope of work and hazard identification and controls may be defined as part of the SWP process in consultation with the identified Suncor Contact.

For **detailed permits**, the Permit Receiver must provide to the Permit Issuer, at a minimum, a **FLHA** or equivalent document that has been mostly completed in the field while reviewing the work location and scope. The FLHA (or equivalent document) must detail the work steps, associated hazards and agreed to controls (with the exception of the current conditions/adjacent work hazards and does not yet contain signatures).

The partially completed FLHA (or equivalent document) will be reviewed with the Permit Issuer and will be updated as required to include considerations for adjacent work and current conditions – if the FLHA is being utilized as the work planning document.

In addition to the FLHA (or equivalent document), the SWP document supports the identification of other documentation that may be required by an applicable regulation or standard. The Permit Receiver or Suncor contact is responsible to provide to the Permit Issuer with the required documentation in advance of a permit being signed

and issued. The documentation is to be developed as part of the Suncor St. Clair Ethanol work planning processes and becomes part of the SWP agreement once submitted.

PERMIT INITIATION

Once work initiation and planning processes are completed, a Permit Receiver of Suncor Contact will notify the Permit Issuer of the need for a SWP.

The permit Issuer must review the work scope for individual task and interactions, compatibility of concurrent work, and the complexity of the work (basic permit versus detailed permit).

Permit Duration: SWPs are generally issued for up to a maximum of a 12 hour period (see continuation for extension requirements) – providing the Permit Issuer, Permit Receiver and associated work crew remain the same for the identified 12 hour period.

Permit Continuation: All permits may be “continued” for an additional 4 hours following a shift change – providing the Permit Receiver and work crew remain the same, scope does not change, the operation remains in steady state and the affected Permit Issuers review the permit in its entirety with the incoming Permit Issuer (who will sign for continuation).

Basic Permits only may be continued for an additional two 12 hour consecutive daily work periods (i.e. permit issuer following a complete review of the permit with the permit receiver, a review of the operation and any adjacent work for potential impacts.

A permit may be issued to a company or an individual – but must be signed by the Permit Receiver.

PERMIT TYPES

There are **two basic permit types** – and the permit issuer is responsible to select one type for all permits issued

Cold Work: any work that does not include activities that may generate a source of ignition or generate heat sufficient to support ignition.

Hot Work: any work including activities that have the potential to generate a source of ignition or generate heat sufficient to support ignition. Note* Lower Explosive Limit (LEL) readings cannot be greater than 10% for basic hot work. **Note that all vehicle entry activities are considered basic hot work**

Basic hot work does not include any hot work in locations classified as hazardous areas (grains receiving, grains DDG barn, grains silos, hammermills, elevators, scalpers, Ethanol loadout, Tankfarm, Distillation, odour stack, evaporators etc.), **open flame and weld activities, or hot work in locations contaminated with flammables and combustibles** (i.e. hot work in the wet pad when DDG contamination is present. **Refer to site drawing SE0803-833 for a comprehensive listing of locations classified as hazardous**

When conducting hot work that is not open flame and weld in a non-classified area, the **minimum controls must be implemented** -

- A fire extinguisher must be readily available in the affected area
- Continuous gas testing is required (see grains exception)

The Permit Issuer (or delegate) must conduct an initial gas test no more than one-hour prior to work commencing and field review with the permit issuer and permit receiver is recommended. A FLHA (OR EQUIVALENT DOCUMENT) is also recommended – but not required for basic permits.

Detailed Permits

In addition to the two basic permit types described above, each work scope must be reviewed to determine the potential applicability of 8 Detailed Permit Categories.

Detailed Permit Category(ies): Include serious injury and fatality (SIF) precursor hazards, specific regulated work activities, as well as life-saving rules (LSR) to ensure that additional hazard controls are reviewed and implemented to reduce risk associated with the work activity. Each detailed category includes “memory” joggers to ensure additional required documentation and controls are consistently evaluated and applied.

Please note that detailed permits may not be continued past 16 hours, a FLHA (OR EQUIVALENT DOCUMENT) is required to be completed by the Permit Receiver and a field review by the permit issuers (or delegate) with the permit receiver prior to issuance of the permit is required for detailed permits including Control of Hazardous Energy, Confined Space, Designate Substance/Toxic Material/Hazardous Atmosphere/Mould, Working at Heights, Excavations and/or Lifting – but is recommended for all SWP activities.

1. Open Flame/Weld/Grind or any Hot Work in a location Classified as Hazardous

Consideration for removing equipment from the field (where practicable) to be welded/cut in a controlled location (i.e. maintenance shop) should be included in the work planning and SWP discussions.

The Permit Issuer (or delegate) must conduct initial gas testing no longer than 30 minutes prior to work commencing and **continuous gas monitoring and a spark watch (equipped with a gas tester, radio and extinguisher)** will be required at all times.

Isolation points associated with Open Flame/Weld/Grind or any Hot Work in a location Classified as Hazardous must be a minimum of double block and bleed – though blanking is preferred.

Hot work in a hazardous classified area required continuous monitoring with Lower Explosive Limit (LEL readings) of 0%. If at any time LEL readings increase above zero – the work must be stopped and a detailed control plan put in place before hot work may resume.

It is important to note that **continuous gas testing for combustible particulate is not covered by the MX6 gas tester**, with no other supporting technology identified. In a location with combustible dust potential – administrative controls must be enacted to remove combustion potential. **Continuous gas monitoring will not be required in the grains receiving area when the work itself does not introduce any potential LEL, CO, CO₂ or O₂ contributions.** Vehicle entries into the grains area are considered basic hot work (i.e. sweeper, payloader, etc.) and will require continuous gas monitoring in the grains receiving building and DDG barn due to ventilation constraints (which need to be managed as part of the SWP planning process.

Work areas must be evaluated for combustible dust contamination, with any identified grain dust material removed or covered and controlled where removal is not practicable.

Site specific testing of Dried Distillers Grain (DDG) identified a minimum explosive concentration of 60g/m with DDG explosive with Kst of 82+/-20%bar m/s (Class 2).

Flammable and combustible materials must be removed from the hot work area wherever practicable or covered and controlled where removal is not practicable

Increasing ventilation and slowing work activities to prevent elevated concentrations of dust in the air are recommended.

The following controls must be considered during the work planning process, with follow-up evaluation during the SWP process –

- Use of fire-resistant covers
- Proactive application of fire resistant blankets and covers to limit spark migration
- Means of spark containment
- Area to be barricaded
- Cold or Wet Cutting Options

Following welding/grinding activities in a location classified as hazardous – the spark watch must remain in the area for 30 minutes to monitor the impacted equipment.

2. **Designate Substance/Toxic Material/Hazardous Atmosphere/Mould**

Safety Data Sheets (SDS) and operational processes must be reviewed by the Suncor Contact/Permit Receiver (verified by the permit issuer) to determine if any materials/work locations that may potential contain designated substances, toxic materials and/or hazardous atmospheres, as well as mould/mycotoxins.

Following identification of a designated substance, toxic material and/or mould, the Suncor Contact must ensure that all identified hazards are managed via an appropriate control plan, in consultation with EHS as required.

Control plans include, but are not limited to; atmospheric monitoring, controls for use/handling to limit potential exposure, respiratory requirements, barricades, signage, etc.

The Permit Issuer must ensure that the Suncor Contact and Permit Receiver have incorporated requirements from 19000-015 Silica and Refractory Ceramic Fibres (RCF) safe work practices for any work related to silica and refractory containing materials (i.e. sand blast material, insulation, cement), as well as areas known to contain Silica/RCF (molecular sieve beds, driers, heater, thermal oxidizers, etc.)

The 11 designated substances include – acrylonitrile, arsenic, asbestos, benzene, coke oven emissions, ethylene oxide, isocyanates, lead, mercury, silica, vinyl chloride.

3. Control of Hazardous Energy

The Permit Issuer must ensure that the Suncor Contact and Permit Receiver have reviewed the work for potential hazardous energy exposure (i.e. chemical, pressure, thermal, unintended start-up, unintended motion, contact with hazards when guards or safety devices have been bypassed or removed). If hazardous energy is identified – the following administrative controls must be provided where applicable –

Note: the Permit Issuer is responsible for evaluating potential hazards due to interacting and/or adjacent tasks

- a. **Equipment Preparation Procedure/Process/Description** – this process includes identifying the type(s) of hazardous energy potentially present in the affected equipment, a description of the removal of the energy, and a verification process to confirm zero energy. Consideration for interacting tasks and appropriate sequence of events must be included. If energy cannot be fully removed – this must be clearly indicated in the plan and on the permit.
- b. **Hazardous Energy Isolation Plan Form (HEIP)** and associated documentation (including P&ID's where possible) that describes the isolation methodology (most stringent methodology at potential energy introduction points) and locking locations. The SWP must only be used to record isolations with two or less locking points.
- c. **First Break Process** – this process accounts for the opening of isolated or depressurized system for cleaning, maintenance or inspection after it has been operational. The first break process must assume energy is still present in the affected equipment until and under take control to eliminate the hazard until it is confirmed that the energy will not be introduced or generated as part of work activities and/or interacting tasks. First break includes body positioning, PPE and monitoring – and may encompass more than one point in a system. **Operations must be present for First Break activities.**

An Implementation plan that considers the appropriate sequence of events and implementation of controls, an energy monitoring and verification plan may be required.

The Permit Issuer (or delegate) must conduct a field review of the Hazardous Energy Isolation Plan (lock points and verification of zero energy) with the Permit Receiver prior to the Permit Receiver signing off on the permit and applying locks and/or tags.

The Permit Issuer must confirm that the Suncor Contact and/or Permit Receiver had included requirements in 19000-022 Hazardous Energy Isolation Standard and LMS Hazardous Energy Control Training for additional training where appropriate.

4. Confined Space

The Permit Issuer must ensure the Suncor Contact and Permit Receiver have conducted planning and preparation processes in compliance with 19000-001 Confined Space.

5. Working at Heights/Dropped Unsecured Objects at Heights

The Permit Issuer must ensure the Suncor Contact and Permit Receiver have conducted planning and preparation processes in compliance with 19000-028 Working at Heights.

Please note that when barricading for over-head work, the area will be taped with “DANGER” tape and affixed with a tag that reads “Danger Overhead Work – Authorized Personnel Only. Assess for Overhead Hazards Prior to Entry”. A contact person must also be provided.

6. Lifting or Hoisting/Working Under a Suspended Load

The Permit Issuer must confirm, for mobile lift equipment that is being utilized to lift (including boom lifts, etc.), that the Suncor Contact and/or Permit Receiver have utilized the Mobile Crane Lift Classification Criteria to identify the lift types, and have subsequently completed the appropriate form (Standard Lift Checklist, Serious Lift Checklist, Critical List Checklist) has been completed – along with all required documentation.

7. Excavations

Excavations include any work, operation or activity that results in the disturbance of ground that is –

- Below grade where ground has not been disturbed and identification of buried facilities is unknown
- Less than 12” but results in the removal of material that is greater than 50% of the buried depth
- Greater than 12” for regularly disturbed area where buried facilities are well documented

Disturbances include, but are not limited to; digging, trenching, ploughing in, drilling, dredging, tunnelling, auguring, backfilling, land levelling, soil addition/removal, clearing, grading, etc.

Any planned excavation activities require current locates for the area identified in the scope of work and for an **Excavation Checklist to be completed by the Suncor Contact and/or Permit Receiver.**

8. Electrical Energy/High Voltage

Only a qualified electrician operating in compliance with CSA Z462-08 may work on high voltage sources at the site.

For electrical energy of less than 600V, the affected employee must have completed the required training with a qualified electrician.

DETAILED HAZARD ASSESSMENT

A documented hazard assessment must be completed for all SWP activities. The hazard assessment may be documented directly on the SWP, FLHA (OR EQUIVALENT DOCUMENT) (FLHA (OR EQUIVALENT DOCUMENT) form (or equivalent), or a combination of – depending on the type of permit (FLHA (OR EQUIVALENT DOCUMENT) required for all detailed permits).

Steps supporting hazard assessment include -

1) Identifying Hazards – ongoing process throughout work scoping, approval and execution

- 2) Establishing Controls
- 3) Evaluating residual risk
- 4) Documenting hazards and controls
- 5) Recording approval
- 6) Communicating

The intent of the SWP and FLHA (OR EQUIVALENT DOCUMENT) is to support safe work execution through systematic communication of hazards, controls and residual risk.

Hazard assessment is an ongoing process that must be completed and reviewed at start of each task, when conditions change, following work interruption and/or when new workers engaged to support the work.

Situational Hazards are part of a hazard assessment and include the following –

- Affected Hazards – hazards associated with the system being worked on
- Applied Hazards – hazards associated with the tools and equipment used
- Ambient Hazards – current work site conditions
- Adjacent Hazards – activity or other hazard that is in close proximity to the work

The appropriate method of hazard control depends on –

- Types of hazards identified
- Complexity of the hazard and worksite
- Potential consequences of the hazards

Severe Weather/Heat/Cold Stress must be reviewed as part of the hazard assessment and controls implemented in compliance with 19000-036 Lightning Safety, 19000007 Temperature Stress and/or other applicable standards where appropriate.

It is the responsibility of the Suncor Contact, Permit Receiver and Permit Issuer to ensure a hazard assessment is completed and communicated to all affected workers.

EQUIPMENT PREPARATION

Equipment preparation activities for any equipment that is affected by the work activity, is to be recorded on the SWP, appending any relevant procedure or workflow processes where appropriate.

ENERGY ISOLATION

Only energy isolations that include 2 or less locking points, may utilize the SWP in place of the Hazardous Energy Isolation Plan Form. Note that when a lock box is not used, workers must lock onto each of the lock points per the standard requirements.

The permit issuer is responsible to ensure requirements in 19000-022 Hazardous Energy Isolation Standard are provided in the documentation (included in planning and preparation activities conducted by the Suncor Contact/Permit Receiver).

PERSONAL PROTECTIVE EQUIPMENT

All PPE must be prescribed and utilized in compliance with 19000-004 Personal Protective Equipment, 19000-005 Respiratory Requirements, 19000-028 Working at Heights and any other applicable standards.

The Suncor Contact and/or Permit Receiver are responsible to identify and procure all required PPE as part of the hazard assessment and work planning processes.

The permit issuers must ensure all PPE is available, in good condition and affected workers are trained to utilize the equipment.

Note that “recommended PPE” is to be recorded in the “describe controls to be implemented” box – with only mandatory PPE being checked off in the check boxes.

GAS MONITORING/TESTING – INITIAL GAS TEST, CONTINUOUS MONITORING, HOW OFTEN

Initial gas test and follow-up continuation tests are to be recorded on the SWP. Any continuous or periodic monitoring must be recorded in the **atmospheric monitoring log form**. For continuous monitoring – results must be documented at a minimum of every 15 minutes by the qualified individual operating the monitor.

PERMIT ISSUANCE

Following a field of work activities (with Permit Issuer where required and/or practicable), completion of a full hazards assessment (FLHA (OR EQUIVALENT DOCUMENT)) and any associated documentation required to support safe work execution – the SWP may be issued to the Permit Receiver(s).

By signing the permit, the receiver agrees that –

“I have read this permit and any associated documentation in its entirety and understand that no work is permitted other than what is described on the permit. I understand work scope, hazards and associated controls that must be put in place to ensure that the work is completed safely – and that if the scope of work or conditions change, I must stop work subject to this permit and review any changes with the Permit Issuer prior to resuming work. I agree that any worker(s) who may work on this job, shall have a complete understanding of the conditions of the permit and will work under these conditions at all times”.

Following sign-off, the original permit will be retained by the Permit Issuer and 2 copies of the permit will be provided to the Permit Receiver for field retention.

Additional workers under the supervision of the Permit Receiver may sign onto the FLHA (OR EQUIVALENT DOCUMENT) in place of the permit following the review of, and agreement to, all associated documentation.

A copy of the completed SWP must be retained at the job site at all times.

Note: Any appended documentation becomes an integral part of the SWP

PERMIT CLOSE OUT

SWP's may be issued for a maximum of a 12 hour period – providing the Permit Issuer, Permit Receiver and associated work crew remain the same for the identified 12 hour period.

Following the close of the 12 hour period or completion of the work, the Permit Receiver must confirm the completion of the work scope, conduct any housekeeping activities and notify the permit issuer of the intent to close the permit and sign-off. The permit receiver must return a minimum of one copy of the SWP and all associated documentation. The permit receiver is responsible to communicate the close out of the permit to all affected workers.

The permit issuer or delegate is responsible to inspect the job site to confirm completion of work and associated housekeeping activities prior to the sign-off of the permit for any detailed permits. Field close-out inspections are also recommended for basic permits.

Permit Continuation: All permits may be “continued” for an additional 4 hours following a shift change – providing the Permit Receiver and work crew remain the same, scope does not change, the operation remains in steady state and the affected Permit Issuers review the permit in its entirety with the incoming Permit Issuer (who will sign for continuation).

Basic Permits only may be continued for up to 2 – 12 hour consecutive work periods (i.e. permit issuer following a complete review of the permit with the permit receiver, a review of the operation and any adjacent work for potential impacts.

All SWP's and associated documentation (FLHA (OR EQUIVALENT DOCUMENT)'s, etc.) are to be returned to the Permit Issuer at the close of the permit.

DOCUMENT RETENTION

Following the return of the SWP and all associated documentation, the Permit Issuer is responsible to secure all documentation together and file in an agreed to location for a minimum of 1 year.

Exception: All SWP involving confined space activities, along with all supporting documentation are to be forwarded to the EHS department for review and filing.

NON-PERMITTED WORK AND OPERATIONAL TASKS

Note: Non-permitted work should not include hands on work or any associated interaction with the process

The following are examples of non-permitted work at the St. Clair Ethanol facility –

- Any Operational work

- Site tours
- Audits

Exceptions to non-permitted work limitations include –

- Chemical offload – 100% accompanied by Operations
- Corn/DDG truck loading/offloading – workers do not interact with the process or utilize Suncor equipment and work only with their vehicles
- Ethanol truck loading – receive a separate training package that requires physical review of loading before being provided access to the site. Interact only with the equipment specified in their training and are provided alarm response details

For all exceptions Operations must confirm that there is a detailed procedure, workers are 100% accompanied at all times (with the exception of ethanol truck drivers and corn/DDG drivers due to controls outlined above), are working under the direction of Suncor St. Clair Ethanol Operations personnel and may require separate training.

It is recommended that a FLHA (or equivalent document) is completed for all work activities that do not require a SWP as a means of ensuring a formal risk assessment has been completed (with the exception of those activities with specific controls listed above).

A logbook is provided in the control room to record the presence and location of personnel in the Operating areas that are not subject to a SWP (note Operations personnel and St. Clair Ethanol staff are excluded from this requirement). Grains drivers are the responsibility of Yard Operations, who will track grains drivers onsite and do not require sign-in to the logbook. Ethanol drivers are provided an access card to track entry and do not require sign-in activities.

All personnel making an entry into the log book must obtain authorization from Operations before proceeding from the Control room into the process area and if appropriate, shall review notification and emergency assembly procedures with an Operations representative.

The log book entry shall include:

- ❖ Time in / Time out
- ❖ Location of work
- ❖ Reason – brief description of the visit purpose

Exceptions to logbook entry include personnel listed below – personnel not required to sign-in the logbook, must verbally check-in with the Control Room and must carry a radio at all times:

Warehouse and Maintenance Coordinator, Site Director, Raw Material and Logistics Coordinator, Operations Coordinator, Operations Manager, Maintenance Manager, Technical Manager, EH&S Team Lead, Environmental Advisor, Safety and Hygiene Advisor and the Project Specialist

The Praxair Facility is a leased property and work within the property does not require a Suncor SWP provided that work does not affect the Suncor St. Clair Ethanol site operations.

REVIEW/REVISION

A review of this document will occur following a regulatory change or at a minimum of every 5 years utilizing the “EH&S SOP Review and Sign-Off Sheet” \\file128\stclair\Operations\Employee Resource Centre\Procedures\SOP's & OGS's. The Document Control Administrator will notify the Document Contact - who will steward the review and will engage the Operation Coordinator to support the review from an operations and maintenance perspective. Other events which trigger review (MOC, Incident Findings) include processes which will initiate review.

REFERENCE DOCUMENTATION

- 19000-001 Confined Space
- 19000-004 Personal Protective Equipment
- 19000-005 Respiratory Requirements
- 19000-007 Temperature Stress Standard
- 19000-015 Silica and Refractory
- 19000-022 Hazardous Energy Isolation
- 19000-028 Working at Heights

Note: Completion of EH&S SOP Review and Sign-off Sheet completed and submitted with updated document

END OF SAFE WORK PRACTICE

REVISIONS			
No.	Date (mm/dd/yyyy)	Author	Description
0	07/31/2007		Created
1	04/08/2011		Review
2	12/13/2017	L. Nauta	Revamped