

ENERGY TRANSFER

Energy Transfer Contractor Environmental Health & Safety Manual

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1 SCOPE AND APPLICABILITY

Energy Transfer (ET) strives to always maintain a safe and healthy workplace for our employees, contractors, and the communities in which we operate. ET relies on all parties to maintain a healthy and safe work environment to help achieve this goal.

This document was developed to convey to applicable third-party contractors (i.e., contractors, Subcontractors, Inspectors, ROW agents, contract employees, etc.) and all other interested parties the basic ET environmental, health, and safety (EHS) processes that apply to work conducted on ET property or while representing ET. This manual is not intended to replace or circumvent any applicable health, and safety standards as stipulated by federal, state, or local regulations or Contractor requirements that are found to be equal to or exceeding the requirements of this document.

Following the applicable agreement under which the Contractor is providing work or services to ET, all contractors performing work on behalf of ET are considered 'Independent contractors' in all matters related to the safety and health of their employees. ET personnel will not stipulate and direct Independent Contractor/Subcontractor personnel to operate and work in a manner that is contrary to established safety rules and regulations. The requirements of this Contractor EHS Manual shall be incorporated in its entirety as integral terms and requirements under the applicable service or construction agreement between ET and the Contractor. In all cases where the Contractor and ET requirements conflict ET requirements shall take precedence.

ET would like to thank you, in advance for ensuring the safety and health of your employees, our personnel, and our communities.

2 REFERENCES

The Energy Transfer safety procedure document identifiers are listed below and a brief description of each. The contractors shall develop safety policies and procedures that meet or exceed Energy Transfer's procedures.

General Safety and Incident Prevention S-005
Incident Management..... S-010
AED Automatic External Defibrillator..... S-015
Asbestos Removal & Maintenance..... S-020
Benzene..... S-025
Driver Safety..... S-035
Compressed Gas Cylinders..... S-040
Combustible Gas Indicators..... S-050
Confined Space Management S-060
Contractor Safety Process..... S-070
Lifting And Rigging Operations and Equipment..... S-080
Dot Motor Carrier Safety..... S-085

Electrical Safety..... S-090
Employee Orientation..... S-100
Equipment & Tool Safety..... S-120
Excavation And Trenching S-130
Fall Prevention And Working At Heights..... S-140
Fire & Explosion Prevention During Cleaning And Purging Of Flammable Gas Piping Systems S-145
Fire Protection..... S-150
First Aid..... S-160
Entry Onto Tops Of Tanks..... S-165
Flammable & Combustible Material S-170
Tank Gauging, Sampling, And Thieving..... S-175
Hazard Communication S-180
Hearing Conservation..... S-190
Hydrogen Sulfide..... S-200
Internal Audits And Inspections S-205
Ladder Safety..... S-210
Lead S-220
Hazardous Energy Control (Lock Out Tag Out) S-230
Material Handling S-240
Medical Records..... S-250
Mobile Powered Equipment..... S-270
Naturally Occurring Radioactive Material..... S-280
Office Safety & Housekeeping..... S-290
OSHA Inspection..... S-300
Personal Protective Equipment S-310
Preparing Equipment For Maintenance And Repair..... S-315
Respiratory Protection..... S-320
Safety Recognition Program..... S-330
Scaffold S-340
Signs & Tags..... S-350
Tank Truck Loading..... S-355
Walking Work Surfaces S-360
Work Permits..... S-370
Glossary..... S-380

Listed below you will find the Energy Transfer engineering standard document identifiers as well as a brief description of each. The identified engineering standards contain environmental provisions that may apply to a project.

Pipeline Construction……C4.0103
Horizontal Directional Drilling, Planning and Execution C4.0111
Pipeline Construction Guidelines Gathering..... 4.0000
Blasting ……C4.0110
Tank Hydrostatic Test Procedure……HL5.0103

3 EHS EXPECTATIONS

Energy Transfer (ET) expects that each Contractor and their employees will perform their duties in a manner that is not harmful or otherwise dangerous to themselves or others. Each Contractor and by default, Contractor personnel, Subcontractors, and their personnel are solely responsible for the safety of their employees. Each person is responsible for reporting at-risk behaviors and/or conditions as they are encountered and to effect immediate remediation of the problem to prevent adverse impact on property and/or personnel.

All contractors are contractually obligated to comply with all applicable federal, state, local, and ET safety and health rules and regulations including applicable ET site-specific and/or business unit policies and procedures. Therefore, each Contractor and/or Subcontractor shall assess the hazards associated with their activities and develop site-specific safety strategies and procedures to mitigate or eliminate identified risks. All site-specific EHS plans shall detail how environmental, health, and safety aspects of the project will be managed and the systems that will be employed to maintain compliance with ET, federal, state, and local requirements. Procedures and processes developed to satisfy the requirements of this plan must work in concert with the existing safety management processes at each affected facility. In addition to the site-specific plans, all contractors shall have and adhere to their core health and safety plans, which must contain rules and procedures that apply to and mitigate the perceived hazards associated with the Contractor's specialty.

contractors utilizing subcontractors and other third-party services must have a subcontractor management process developed and implemented before initial use. Further, the contractor shall ensure that all third-party services and their personnel adhere to the Contractor's core safety procedures, site-specific safety plan, and emergency response plan unless otherwise approved by ET management, in writing and in advance of such a deviation.

English is the official language for all modes of communication at all Energy Transfer worksites. If contractors and/or Subcontractors employ individuals who cannot or have a limited ability to read, write, and/or comprehend the English language, said entity shall ensure that all safety and health-related data is presented to each affected individual in their native language. This requirement applies but is not limited to the contractors' and Subcontractors' basic and site-specific EHS plans, orientation documents, safety forms, work permits, and Safety Data Sheets.

The contents of this document cannot replace the application of good judgment and common sense in preventing adverse health effects and safety-related incidents.

Therefore, everyone shall work safely and insist that others do the same. Each person must consider the significance of their actions and diminish any adverse consequences. No one, contract or otherwise, shall knowingly work and/or remain in areas where unsafe conditions exist, persist, or have the potential to develop without mitigation methods properly implemented and maintained.

Under no circumstances will ET require contract personnel or any personnel on ET work sites to expose themselves or others to hazardous environments/situations without proper training and adequate personal protective equipment.

Each contractor must disseminate the information contained in this manual to all applicable personnel, including subcontract personnel, before accessing ET property or projects.

NOTE: ET requires each person to refuse to work in, or otherwise occupy, areas where hazards exist or have the potential to develop, without first receiving the appropriate training and implementing and maintaining proper mitigation methods.

ET will periodically update this manual as needed.

3.1 Minimum On-Site Safety Representatives

The Contractor shall determine the appropriate onsite full-time dedicated Safety Representatives to ensure a safe job site. Energy Transfer requires, at minimum, one (1) full-time on-site Safety Representative once the staffing of the contractor and their subcontractors for the site reaches 25 persons per day on average for the week. A second full-time on-site Safety Representative shall be added once the site reaches 65 persons on average for the week. For each additional 75 persons added to the site, an additional full-time Safety Representative shall be added. They must properly staff their safety department. This section is only to determine the minimum requirements. During Energy Isolation, Hot Work, Line break, or Permitted Confined Space, the On-site Safety Representative shall remain at the Job Location. On-site Safety Representatives shall attend Pre-job Planning and Safety Meetings and be in close contact with Site Safety Inspectors. The Contractor and Project Manager/Engineer can determine on a job-by-job basis if the numbers above could be amended. This must be approved by the Energy Transfer E&C Safety Manager.

4 ROLES AND RESPONSIBILITIES

The following Roles and Responsibilities provide an abbreviated explanation of obligations that follow each job title and a basic description of the EHS obligations for a typical construction and/or maintenance project. Each project's individual environmental, safety, and health requirements will ultimately dictate a complete and objective scope of health and safety essentials.

4.1 Contractor and Subcontractor Superintendents (or designees as deemed appropriate)

The Contractor and Subcontractor Superintendents shall comply with ET and Contractor requirements, including but not limited to verifying the implementation of the Contractor's internal EHS management programs and processes in addition to:

- Stop and correct any activities perceived to be **Immediately Dangerous to Life and Health** (IDLH).
- Implement the contractor's core (general) construction EHS requirements.
- Establish, document, and maintain a site-specific EHS management plan(s) that include safe work procedures predicated on the requirements of the work, this manual, and the contractors' EHS requirements. Site-Specific Safety Plans will be required regardless of project size.

4.2 Contractor EHS Representative

- Site-Specific EHS plans must be inclusive of all anticipated job tasks and activities performed by Contractor personnel and their Subcontractors. Site Specific EHS plans must be provided to the Project Manager or Construction Manager during the project kickoff.
- Document, maintain, and update contact information for principal project personnel to include name, title, company affiliation, and phone numbers where everyone can be contacted at any time. This information must be readily available, at the job site, for the Contractor, Subcontractor, and/or ET review.

- Identify training and compliance requirements of relevant legislation, standards, and codes of practice for the designated scope of work.
- Verify employees who are performing any Operator Qualification (OQ) task are OQ qualified.
- Identify risks based on the scope of work using standard risk assessment methodologies.
- Conduct and document EHS-related reviews of work locations as required to verify compliance with established safety rules and procedures.
- Enable site EHS resources to achieve compliance with the requirements of this plan, the Contractor's own general and site-specific plans, and all other applicable EHS rules, laws, and regulations by allocating the necessary resources and providing visible management support.
- Actively participate in EHS meetings (note: the terminology of "EMS meetings" or "Safety meetings" may be used interchangeably).
- Establish a process for reviewing and acting upon risk observations, risk mitigation efforts, audits, and inspection findings.
- Ensure that Contractor/Subcontractor/ Online orientations have been completed before arriving at the work location(s).
- Verify personnel training is being performed in compliance with applicable laws,

rules, and regulations.

- Verify Contractor and Subcontractor personnel have the appropriate level of training and/or supervision to complete the assigned tasks.
- Verify the qualifications and competence of equipment and machine operators.
- Keep and maintain records and logs of training, orientations, and incident reporting.
- Require the use of Job-Safety-Analysis/Job-Hazard-Analysis or similar processes for identification and management of risk associated with the designated work.
- Verify, through a documented process, that Job Safety Analysis / Job Hazard Analysis (JSA/JHA) or similar processes are being utilized to analyze and mitigate risks associated with work that is not considered routine, has never been performed or that has not previously been subjected to scrutiny using JSA/JHA type evaluation.
- Require that all relevant personnel have reviewed the results of all applicable safety analysis reports and understand them completely before commencing work activities. Once reviewed and comprehension verified, the appropriate supervisor/lead man shall confirm that the affected personnel sign and date a copy of the applicable Job Safety Analysis/ Job Hazard Analysis form.
- Verify and document that the appropriate EHS analysis documents are reviewed with all personnel, including, new personnel and individuals that are new to a given work process before beginning their assigned duties.
- Verify that EHS analysis results are reviewed for applicability, as needed, or when changes in job conditions warrant and/or cause an increase in risk to personnel and/or the environment.
- Require and document daily safety ‘toolbox’ meetings or similar safety meetings where daily activities are discussed among affected personnel before the commencement of work activities.
- Require that procedures for reporting incidents and at-risk behavior or conditions be followed. All incidents and at-risk behavior shall be immediately reported to ET Personnel/Representatives.
- Verify compliance with ET procedures for investigating incidents.
- Confirm Contractor/Subcontractor personnel follow applicable procedures for maintaining the integrity and security of ET facilities.
- Develop emergency response procedures that consider the identified hazards of specific work locations. These procedures must include information about emergency response entities, the corresponding facilities, and emergency response phone numbers.
- If in a public location, verify a procedure has been developed and implemented to alert the public and other personnel in the general vicinity of the work location, of an emergency.
- Respond to emergency events and verify that injured personnel are cared for promptly and that the area is sufficiently secured against alteration pending an investigation.
- Gather and submit the required safety-related information (i.e., Near Miss, Good Catch, Lost Time Incidents, Reduced Work Events, Recordable Incidents, Leading & Lagging Indicators, etc.) to ET Personnel/ Representatives.
- Make first aid kits available and maintain them as required by this manual and OSHA regulations.
- Provide feedback on current EHS-related events and incidents as well as topics for

daily safety 'toolbox' / 'tailgate' meetings.
- Manage all safety-related Contractor and Subcontractor documentation.
- Verify and document that all Subcontractors are following your (Contractor's) EHS policies and procedures and that your policies and procedures meet or exceed the expectations of ET.

Records

The contractor shall maintain any EHS records, data, and information directly or indirectly related to work conducted on ET property or while representing ET; including without limitation, JSAs, notes, and data evidencing daily EHS "toolbox" or "tailgate" meetings, any documentation related to hazard communication (including SDSs), documents and information evidencing employee selection, competency, and training, and the subcontractor or vendor selection, any EHS training or related information, investigation reports and supporting documentation, or any other records, monitoring data, or information required or implied as necessary under this EHS Manual or created as a result of work or services provided to ET (collectively "EHS Documentation"). The contractor shall provide any requested EHS Documentation to Energy Transfer Personnel/ Representatives within 24 hours.

EHS records shall be written in legible, identifiable, traceable, and readily retrievable.

5 EMPLOYEE INVOLVEMENT AND DISSEMINATION OF EHS INFORMATION

5.1 Involvement

ET strongly encourages employee involvement as it provides the environment through which employees can develop and express their commitment to EHS. Methods to promote employee involvement include, but are not limited to:

- Attend pre-job kick-off meeting
- Attending morning or pre-shift EHS "toolbox" or "tailgate" meetings
- Completing orientation (via Veriforce) before commencement of a project or entry into an Energy Transfer facility.
- Participation in the development and implementation of JSA/JHA-type activities.

5.2 Communication

Communication between ET, the inspection team, and the Contractor representatives is a critical element in managing EHS performance. Scheduling regular meetings in conjunction with project start-up to communicate any EHS issues is imperative for a successful and safe project completion.

Projects that consist of several different contractors/Subcontractors with multiple EHS representatives are encouraged to develop a project EHS team. This team's members should consist of the EHS Professionals from the different contractors/Subcontractors on the project. This team should work with an ET EHS Representative if possible.

5.3 EHS "Toolbox/Tailgate" Meetings

EHS toolbox/tailgate meetings or similar type meetings must be held at the beginning of each workday, to raise the awareness level of affected personnel.

5.4 Objectives, Plans, and Performance Standards

Contractors and their Subcontractors are solely responsible for compliance and enforcement of EHS related matters associated with their respective scopes of work. All supervisory personnel shall communicate the project EHS objectives, plans, and performance standards during the orientation process, during the development of JSAs, and at toolbox meetings to ensure an understanding of and participation in achieving the project's EHS goals.

6 IMPLEMENTATION

6.1 Audits, Observations, and Reviews

The contractors and/or Subcontractors shall initiate and maintain a program that provides for frequent and regular documented inspections, reviews, and audits of job sites, materials, tools, and equipment. All audits and/or reviews required under this plan shall be conducted by Competent Personnel designated by their respective employers. All documents produced during the referenced inspection, reviews, and audits shall be maintained on the project location for the duration of the work and made readily accessible to ET Representatives for review upon request.

6.2 EHS Procedures

Contractors must develop, approve, and implement EHS procedures, including work plans that effectively manage hazards and risks arising from the activities of the contractors and/or Subcontractors. EHS procedures must be developed in a manner that:

- Provides the level of detail required to manage and mitigate specific hazards and risks.
- Documents the processes and controls used to verify a safe system of work for key work activities.

6.3 Hazard Identification and Mitigation

Contractors/ Subcontractors shall use standard risk assessment methods to identify and communicate hazards. These methods should facilitate:

- Identification, likelihood, and consequences of occurrence of identified hazards.
- Implementation of necessary controls.

- Use of Job Safety Analysis (JSA) or similar tool for identification and communication of hazards.
- Development of effective hazard control systems before mobilization and construction.
- The preferred hierarchy for the control or management of risks shall be:

    - Elimination - eliminate hazards through design/process modification.
    - Substitution - replace hazardous materials/processes with less hazardous option(s).
    - Isolation - physically remove the person from the exposure hazard.
    - Engineering - provides for a structural change to the work environment, process, or equipment.
    - Administrative - control hazard exposure events through job rotation, warning signs, barriers, etc.
    - Personal Protective Equipment - place a barrier between the wearer and the hazard.

6.3.1 Job Safety Analysis (JSA)

A useful tool for hazard identification and risk communication is the Job Safety Analysis (JSA) process. The JSA is a documented process that focuses on the relationship between the worker, the task, the tools, and the work environment. The JSA requires the involvement of all members of the work crew in its development. All Hazards associated with work for the day shall be discussed and listed. Once hazards have been identified, steps shall be taken to eliminate or reduce the hazards to an acceptable level. All JSAs (or equivalent) shall be maintained at the project location for the duration of the work and made available for review by contractors, Subcontractors, and ET personnel. JSAs, other EHS documents, and Permits should be available at the job site for review. All personnel not involved in the JSA development or JSA meeting and who will be involved with the job, need to review, and discuss Hazards Identified, and sign onto the JSA before beginning work.

6.4 Hazard Communication - Global Harmonization System (GHS)

The Contractor shall ensure that all chemicals and materials used on the work site, including those used by Subcontractors, have been evaluated and information concerning identified hazards has been disseminated to all affected personnel. contractors must also provide ET personnel SDS’s for any chemicals they bring on the work site.

6.4.1 Existing Facilities

Chemicals and other consumables that contractors/Subcontractors wish to bring into existing ET facilities must first be approved by the designated Area EHS Representative. Contact the Operations representative in the area(s) where the work will be performed for information on accomplishing this task.

6.5 Marking Physical Hazards

6.5.1 Signs, Signals, and Barricades

Signs, signals, and barricades used for marking hazards shall be visible at all times while they are marking/warning of the hazard(s) and shall be removed or covered promptly when the hazard(s) no longer exists.

6.5.2 Vehicular Traffic

Contractors shall adhere to facility traffic and parking requirements when working at ET sites and locations. When operating equipment, contractors shall utilize flaggers. ET recommends that designated Flaggers and Spotters wear a High Visibility Vest.

6.5.3 Parking

When working on ET sites or facilities, contractors shall park in designated areas, and they should pull through parking spaces or back into the space when parking.

6.6 Maintenance and Repair of Tools and Equipment

Contractors and Subcontractors shall develop programs for routine/daily inspection, documentation, and maintenance of construction tools and equipment. The frequency of inspection and maintenance schedules shall reflect the manufacturer and regulatory requirements as well as best management practices. Equipment found to be defective or dangerous shall be taken out of service immediately.

6.7 Employee Selection, Competency, and Training

Each Contractor/Subcontractor shall be responsible for assessing and confirming that personnel are competent, capable, and certified (when required) to perform their assigned duties. Each Contractor/Subcontractor is responsible for ensuring their employees are properly trained, and their equipment and work activities comply with all local, state, and federal safety requirements.

6.8 Personal Protective Equipment (PPE)

All contractors and Subcontractors are responsible for supplying and requiring the use of appropriate personal protective equipment and devices in all operations where there is an exposure to hazardous conditions or where the use of such equipment will reduce the risk of personal injury. PPE shall be maintained, on-site, in sufficient quantities to

facilitate immediate outfitting of personnel daily. Contract employees must also ensure that all PPE is properly inspected prior to use. Contract employees must ensure that they are thoroughly familiar with the equipment and its limitations before it is issued to them and used.

- Flame Resistant Clothing (FRC): Must meet current NFPA 2112 standards with a minimum ATPV value of 8 calories/cm2 or a corresponding Hazard Risk Category (HRC) rating of 2 is requirement when working in or at locations with hydrocarbons.
- Hard hats: Must meet current Z-89.1 standards and should not be altered in anyway.
- Eye and Face Protection: Safety glasses must meet current ANSI Z.87.1 standards and must include side protection/side shields.

All PPE must meet current American National Standard Institute (ANSI) requirements.

Basic PPE requirements can be found in Energy Transfer's Personal Protection Equipment Procedure S-310.

If identified during the hazard identification process, specialized PPE (e.g., full-face shields, gloves, shin guards, snake chaps, metatarsal guards, etc.) may be required.

6.9 Security

All Contractor, Subcontractor, and Vendor (CSV) personnel must have an approved business reason to enter a ET facility and have undergone all necessary clearances and training. All CSV personnel accessing a ET facility must possess the appropriate credentials (e.g., Government Photo Identification (i.e., state-issued driver's license) or a Transportation Worker Identification Card (TWIC) card for unescorted access to Maritime Transportation Security Act (MTSA) facilities). CSV personnel shall not be outside the facility-designated work area(s) they are assigned to accept for transversing to and from the vehicle or pedestrian ingress and egress areas and laydown equipment areas without the facility management's authorization. If, in certain instances, persons are found to be in places where access is not permitted and deemed restricted or sensitive, the violation may be considered a breach of security and cause for removal from the facility and other regulatory requirements. Escorting of routine vendors such as Fed-Ex, UPS, landscapers, and trash haulers is not required, provided these services have been properly vetted and approved for business needs by facility management. All persons, vehicles, equipment, and packages are subject to screening based upon routine and enhanced security measures, which may be derived from ET security best practices and federal regulations. No photographs or video recordings may be taken or produced without the prior written consent of appropriate ET management. The use of airborne drones, helicopters, planes, remote-controlled vehicles, boats, or any other devices to access or circumvent facility security for any purpose is strictly prohibited.

6.10 EHS Training

All Contractor and Subcontractor personnel, including visitors accessing ET property, shall complete ET's Online Contractor EHS Orientation (self-administered via Veriforce) or other ET EHS Orientation Training via the Industrial Safety Training Council (ISTC). Additional ET site-specific orientation briefings will be required when working in established facilities.

NOTE: Quick Reference Guides for both the Veriforce and ISTC ET Orientation training can be requested from ET. Contractors are encouraged to contact Veriforce or ISTC with any questions or issues they may encounter.

All contractors/Subcontractors' personnel shall train and document site-specific EHS and Emergency Response Plans before commencing work activities.

All applicable training records shall be maintained in a suitable location at or close to the work location, for the lifetime of the project.

6.10.1 Training Schedule & Refresher Training:

The orientation method is based on a 12-month period, and ISTC and Veriforce will notify contractors when retraining is due.

6.11 Emergency Response

All ET processing and/or treating plants have an alarm system for alerting personnel and visitors within the location of an emergency. These alarms are distinctive from normal operational alarm systems and will also vary from location to location. Before entering the location for the first time an ET representative will explain the alarm system during the location site specific safety orientation.

All contractors are required to know the incident and/or emergency alarm warning system. In general, when an incident or emergency occurs, you should:

- Immediately stop work.
- Turn off equipment unless doing so would be hazardous or endanger personnel.
- Evacuate to a designated safe location; and,
- Account for all contract employees and report head count information to ET personnel.

Local emergency responder telephone numbers (fire, ambulance, doctor, etc.) are posted in the location control room, office building, etc. Equipment such as fire extinguishers, fire blankets, SCBA/escape breathing equipment, emergency showers, eyewash stations and first aid kits are located at various areas at each location. Prior to performing any work in the plant, locate the fire extinguishers and other applicable emergency equipment closest to your work area, and determine the safest evacuation route to the nearest emergency exit.

For ET field locations that do not have alarm systems, notification of an incident and/or emergency is handled by direct voice communication.

6.12 First Aid, Medical Care Services, and Facilities

A risk assessment of possible emergencies concerning the designated work and the proximity of emergency services locations shall be conducted by the Contractor/Subcontractor to verify that supplied first aid equipment and medical response resources are appropriate to manage potential injury events. The Contractor and/or Subcontractor shall make first aid and medical care services available to each employee.

In the absence of appropriate ambulance services or other emergency response services, medical facilities, or a physician, who is reasonably accessible in terms of time and distance to the worksite and is available for the treatment of injured employees, each Contractor/Subcontractor must determine the necessary means by which they will have to transport an injured employee and ensure those conveyances have been arranged for and are in place before the start of the project (e.g. helicopter service, private ambulance, etc.). A list of approved responders, their contact information, and how personnel shall be transported in the event of an emergency shall be posted in a conspicuous, centralized location.

7 WORKPLACE ENVIRONMENT

In general, Contractor and/or Subcontractor management shall not require or allow personnel to work in conditions considered unsanitary, hazardous, or dangerous to life, environment, health, or safety.

7.1 Chains, Slings, and Cables

All lifting chains, slings, cables, and associated attachments (e.g., hooks, d-rings, shackles, etc.) shall be inspected, utilized, and removed from service as required by applicable OSHA requirements (i.e., General Industry 1910.184, Construction 1926.251) in addition to the following:

- Chains, slings, cables, and all lifting attachments (e.g., hooks, d-rings, shackles, etc.) that have been shock loaded and/or utilized for purposes other than vertical lifts (e.g., pulling, tugging, bundling, etc.) shall be marked and prohibited from use as a vertical lifting device.

- The possession and/or use of ‘home-made’ and/or ‘shop-made’ lifting devices is strictly prohibited unless those devices have been tested and certified by an accredited entity and the applicable certifications are kept with the specified lifting devices.

7.2 Cranes, Rigging, and Cribbing

All contractors and their Subcontractors utilizing cranes, rigging, and cribbing during the execution of their work shall be solely responsible for the proper setup, inspection, operation, maintenance, and disassembly of said equipment. Contractor/Subcontractor management shall not allow untrained or unauthorized personnel to perform any activities involving the assembly, use, and disassembly of cranes, rigging, and/or cribbing. All activities shall follow 29CFR1926.1427 Subpart CC.

7.3 Electrical Safety

Affected Contractors/Subcontractors shall be responsible for implementing all electrical safety requirements following the OSHA (1910 Subpart S, General Industry or 1926 Subpart K, Construction) and National Fire Prevention Association (NFPA 70E) requirements. Work in existing ET facilities shall be in accordance with ET's S-90 Electrical Safety procedure.

7.3.1 Overhead Utility Lines

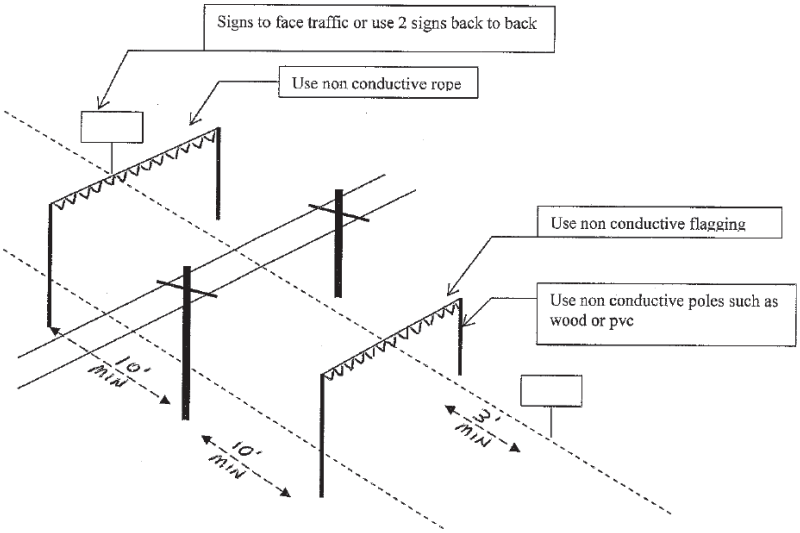
Each Contractor/Subcontractor shall advise their personnel of the location of all identified power lines, both above and below ground. Additionally, each affected person must be informed of the dangers encountered or in close enough proximity to the line to facilitate arcing and the protective measures to avoid the specific hazards. Each individual working around or traversing under power lines shall adhere to the distancing requirements stipulated in 1926.1408 through 1411 as appropriate.

The following mandatory measures shall be taken to mark overhead power lines:

- Signage - Both "Beware of Overhead Lines" and signs marking the clearance distance from the ground to the nearest transmission lines shall be posted at eye level, on both sides of the approach. Signs shall be at least 2 feet x 2 feet with > two (2) inch lettering.
- Physical barriers - A non-conductive barrier (e.g., goal posts with rope and ribbons/flagging) shall be set on both sides of the identified line. The top of the barrier shall mark the highest safe encroachment limit. Placement of barriers directly under a power line is not allowed.
- Dedicated Spotter - shall be required anytime an object passes under a line within the non-encroachment zone. Spotters shall be trained and must know OSHA's minimum distancing requirements for overhead power lines. Additionally, Spotters shall have no other duties assigned to them while performing their duties. The Spotter shall wear clothing that distinguishes him/her from others to be easily seen by the equipment operator. The Spotter shall carry and utilize, when appropriate, a signaling device, such as a whistle or air horn which can be heard by the equipment operator over the noise of the equipment he/she is operating. When the device is activated, its use shall mandate an immediate ALL-STOP action of the equipment operator.

When approaches to power lines make it possible, the following distances shall be observed when placing the required approach controls.

- Signage - thirteen feet from the designated power line
- Physical barriers - ten feet from the designated power line



It shall be the responsibility of each Contractor/Subcontractor to contact the owner/operator (utility ET) of the identified power line to ascertain the maximum voltage of the designated line and to determine whether the line has uninterrupted service (i.e., will not de-energize when grounded). The response from the owner/operator must include information concerning any other special precautions that must be observed to protect the health and safety of affected personnel.

7.4 Excavations / Trenching / Shoring

Notify the appropriate state One Call system before disturbing the topsoil or any other ground coverings (i.e., concrete, asphalt, grass, tree removal, etc.). All underground utilities shall be marked by the appropriate asset owner (e.g., electrical ET, phone ET, municipal entities, etc.). Disturbance of any type of ground covering shall not commence until all underground utilities are completely identified and marked.

All excavation, trenching, and shoring activities, regardless of classification (i.e., General Industry, Construction) shall adhere to the requirements outlined in 29 CFR 1926 Subpart P. Additionally, each Contractor shall complete an Excavation Checklist - for themselves and their Subcontractors which, at minimum, provide areas for detailing ground conditions, integrity control methods, and compliance parameters. Work/Excavation Permits shall be completed by a designated ET Representative and posted at or near the affected excavation areas at the beginning of each shift, where personnel anticipate entering the excavation. This includes brownfield excavations inside an existing facility. Each part of an excavation and/or bell hole in a continuous trench that will be entered must have an individual entry permit regardless of proximity or size. All personnel who enter an excavation regardless of their intentions shall have at minimum, Excavation Hazard Awareness Training.

All activities covered by this section shall be subject to the implementation of 'Soft-Dig' methods when excavating within two feet of existing facilities. Soft dig methods are utilized to minimize the likelihood of damaging existing facilities and may include, but are not limited to, hand digging, probing, and hydro-vacuum operations.

Excavation, trenching, and shoring activities that do not meet the stipulated requirements of 1926 Subpart P and/or which will be > 20 feet in depth shall be designed and approved by an appropriate Professional Engineer (PE) with the requisite knowledge and experience to safely design such systems. Additionally, the PE must be registered in the state where the work is to be performed and familiar with state and local rules and regulations concerning excavations as applicable to the work to be performed. All documentation shall bear the seal of the applicable PE and be maintained at the excavation location or near the affected area.

7.5 Fall Protection

In all instances where personnel are exposed or have the potential to be exposed to a fall hazard > 6 feet or when exposed to existing or potential hazards below the designated work area, without regard to height, (e.g., rotating equipment, open vats) the applicable section of 29 CFR 1926 Subpart M shall be implemented and strictly enforced.

NOTE: This requirement applies to all applicable floor, roof, and wall openings that present a fall hazard of greater than six (6) feet, regardless of location.

All components of any designated Fall Arrest Systems (harness, connectors, lanyard, yo-yos, anchor points, lifelines, guardrails, hole covers, safety nets, etc.) shall be inspected before use and as needed during use to ensure the integrity of the system. All defective components of personnel fall arrest systems must be immediately replaced, and defective devices shall be removed from service and tagged and/or decommissioned in a way that prevents use.

All fall arrest systems utilized to protect personnel from an identified fall hazard must consider the height from which the work will be conducted and shall choose the proper fall arrest device (e.g., lanyard) for the job task.

Any person operating or actively present on a personnel lift platform (e.g., man lift, scissor lift, man-basket, etc.) shall utilize fall protection in the form of a full body harness regardless of the height at which the equipment is being operated.

Each Contractor/Subcontractor that is required to use fall protection as outlined in the applicable OSHA standards, shall assign a competent person to oversee the implementation and maintenance of the program.

7.6 Protection from Falling Objects

In all cases where personnel are exposed to the hazard of falling objects each Contractor/Subcontractor shall prevent an impact event by erecting toe-boards, screens, and or guardrail systems to prevent materials from falling from a higher level.

7.7 Hazardous Energy Isolation (Lock Out / Tag Out Or LOTO)

Hazardous Energy Isolation procedures shall be implemented anytime the threat of an uncontrolled release of hazardous energy, either actual or potential, can occur.

Each Contractor/Subcontractor is required to participate in ET LOTO events (i.e., Group LOTO events) in all cases where the release of hazardous energy could affect the health and safety of their personnel.

Everyone tasked with applying and removing lock-out/tag-out devices must receive the appropriate level of training to achieve compliance with the requirements of this manual and the applicable OSHA Standards National Fire Protection Association Standards.

All contractors and Subcontractors shall be solely responsible for the proper application of applicable energy isolation systems when in exclusive care, custody, and control of a system or piece of equipment that requires isolation. Each Contractor/Subcontractor shall develop and implement a hazardous energy isolation plan that conforms to the applicable requirements of 29 CFR 1926.

7.8 Housekeeping

All debris, tools, building materials, and other obstructions shall not be allowed to accumulate in work areas, passageways, doorways, stairs, or in and around buildings and/or other structures. The Contractor and/or Subcontractor must manage all tools, equipment, and materials in a way that is conducive to maintaining a clutter-free work environment.

7.8.1 Sanitation

Each Contractor/Subcontractor shall maintain their respective work areas in a manner that facilitates acceptable hygiene practices. Refuse must be maintained/controlled in appropriate containers that can be covered or closed to prevent the migration of waste via wind or animals. All eating and break areas must be kept free from accumulations of waste. All waste materials shall be disposed of under the applicable local, state, and/or federal regulations.

7.9 Ladders and Stairwells

The use of ladders and stairwells on ET projects shall conform to the applicable requirements OSHA 29 CFR 1910.25 through 27 for General Industry activities, and 29 CFR 1926 Subpart X for Construction activities.

7.10 Materials Handling, Storage, Use, and Disposal

7.10.1 Handling

All material handling equipment shall be inspected at the beginning of each shift, before use, and as necessary during each shift to verify safe operability.

All contractors and Subcontractors shall develop and maintain a Hazard Communication Program that includes training requirements for affected personnel and the development of a site-specific register of hazardous materials and/or dangerous goods following the applicable OSHA requirements (i.e., 1910.1200; 1926.59). The program must include means to establish and maintain Safety Data Sheets (a.k.a. Material Safety Data Sheets) for each identified material.

Safety Data Sheets must be available to all affected personnel and reasonably available to personnel who may become affected in case of spills or exposure events such as visitors and the public. Safety Data Sheets shall be reviewed by competent Contractor/Subcontractor management personnel for health and other pertinent risk factors before initial use. If hazardous components are identified in sufficient quantities, appropriate action must be taken to assess exposure and provide appropriate protective measures via administrative controls, substitution, distancing, PPE, or any other measures deemed appropriate to protect workers' health and the health of anyone that may be affected by the transportation, storage, use or application of the product or its components.

7.10.2 Storage

All materials shall be stored in a manner that prevents sliding, falling, or collapsing. Aisle ways and paths must remain unobstructed to provide for the free and safe movement of materials and personnel. Hazardous materials or dangerous goods must be stored in designated areas as stipulated in the applicable Safety Data Sheet and regulatory requirements.

A register of hazardous materials, dangerous goods, and their associated safety data sheets shall be maintained at the project location for the duration of each project. See the previous section for specific details.

7.10.3 Disposal of Waste Materials

Disposal of waste materials must comply with state, federal, and local environmental regulations and/or best management practices. Waste materials shall not be abandoned or used in a manner that constitutes disposal. All hazardous and/or liquid wastes must be stored in compatible containers; intentional mixing with other materials, hazardous or otherwise, is prohibited.

7.10.4 Delivery of Materials

The Contractor shall meet with a representative of the trucking ET to establish and document the entry and exit routes from the right-of-way as well as other protocols (e.g., signaling, spotters, driver responsibilities, and PPE requirements) before the delivery of equipment and the delivery and off-loading of pipe and materials to the site.

7.11 Scaffolding

Contractors and Subcontractors that require the use of scaffolds shall comply with the applicable requirements of OSHA 29 CFR 1910.28 for General Industry or 29 CFR 1926 Subpart L for Construction. User/hazard awareness training must be provided to all personnel before their initial access to any scaffolding system being used to protect personnel from real or perceived hazards. Fall protection shall be provided at elevations of four feet in operations and six feet in construction. Workers will use a harness, self-retracting lifelines, lanyards, I-beam straps, and so on only as permitted by the equipment manufacturer and in accordance with published instructions unless authorized by a designated competent person. 100% tie-off (protection from falls at all times, even when moving from point to point) must be provided while using personal fall protection. Sometimes, this may require using two lanyards.

A Competent Person shall document the required inspections upon completion of the review by signing or initialing and dating the back of the appropriately colored tag before the scaffold is put into use.

7.12 Illumination

Provide sufficient natural or artificial illumination to facilitate the tasks being performed in construction areas, aisles, stairs, ramps, runways, corridors, offices, shops, and storage areas. No work shall be performed in areas where sufficient lighting has not been provided. This requirement shall include evening hours and times before dawn and post-twilight hours or at other times as deemed appropriate by the ET Inspection Staff or ET EHS Representation or Operations personnel.

7.13 Non-Potable Water

Identify outlets for non-potable water using signs that indicate the water is unsafe for drinking, washing, or cooking purposes.

7.14 Potable Water

Maintain and make easily accessible, adequate supplies of potable (drinkable) water. Control of the water source shall be such that it prohibits contamination.

7.15 Means of Egress

Provide for and always maintain emergency egress points and pathways. The use of locks or other fastening devices on egress doorways/pathways is strictly prohibited during normal working hours and/or while workers are present.

7.16 Personal Hygiene

7.16.1 Restrooms

At a minimum, all contractors/Subcontractors shall provide toilets for personnel according to the following table:

Number of Employees	Number of Toilets Required
20 or less	1 toilet w/seat
20 or more	1 toilet w/seat & 1 urinal per 40 workers
200 or more	1 toilet w/seat & 1 urinal per 50 workers

All bathroom facilities shall be maintained in a manner that does not allow unsanitary conditions to occur.

7.16.2 Washing Facilities

Each Contractor/Subcontractor shall provide adequate washing facilities for employees engaged in manual work activities. These facilities shall be near the worksite and shall be so equipped as to enable employees to promptly remove worksite contaminants. Each washing location shall be maintained in a manner that provides for good hygiene practices, including the timely removal of waste materials. The appropriate Contractor/Subcontractor shall be responsible for maintaining the wash station(s) in a sanitary condition.

7.16.3 Eating, Drinking, and Break Areas

The consumption of food or beverages is strictly prohibited in bathrooms, washing areas, or any area that may facilitate exposure to unsanitary or toxic conditions. Efforts shall be made to provide an area, away from work activities, in which to take breaks and meals.

Smoking – At the beginning of each project, Construction Management will determine where or if designated smoking areas will be and disseminate their locations. Butt cans must be provided. Smoking will also include the use of “vaping products” or “e-cigarette devices.”

7.17 Process Safety Management (PSM) / Pipeline Safety Management System (PSMS)

All contractors and Subcontractors executing work, Construction/Maintenance or otherwise, regulated by OSHA 29 CFR 1910.119 and/or 1926.64 shall obtain a copy of the applicable ET EHS guidelines for Process Safety Management from their respective ET contact or by requesting a copy from the Corporate Safety Department.

ET has adopted API-RP-1173 as its Pipeline Safety Management System (PSMS) and has incorporated it into its Organizational Excellence (OE) program. Contractors working on any PHMSA regulated pipeline assets should be familiar with and have programs consistent with the elements of API-RP-1173.

7.18 Heavy and Mobile Powered Equipment

Contractor equipment operators must be licensed and/or certified to operate the equipment. Certification (National either NCCER or NCCCO) is required for crane operations, powered industrial trucks, and other equipment as applicable. contractors shall inspect test and ensure that all powered equipment is brought to work sites in a safe operating condition before arriving on Energy Transfer properties and/or projects.

- Each equipment operator shall ensure that the equipment they plan to operate has been inspected and documented. Inspections shall be performed by the person(s) operating the equipment at the beginning of each shift, before the operation of the equipment, after a maintenance has been performed.
    - The most current inspection document form must remain with the applicable piece of equipment for the duration of the shift for which it applies.
    - Each inspection document must contain items related to the major mechanical components of the piece of equipment to which the inspection document applies and which make the piece of equipment function properly and safe to operate.
    - Noted deficiencies shall be corrected/repaired before operating the equipment.

- Seatbelts or other body restraint devices shall be always worn while Heavy and Mobile Powered Equipment is in motion.
- Cell Phone usage is strictly prohibited during equipment operation. Contractor employees must observe all posted speed limits and traffic control signs.
- Only operate equipment on designated roads or rights-of-way. Only properly trained, qualified personnel are permitted to operate equipment or machinery.
- Operators must be able to produce certificates of training and licenses when applicable.
- Audible backup alarms must be correctly installed and maintained on all applicable equipment, e.g., track hoes, bulldozers, front-end loaders, side booms, etc.
- All applicable warning signs, rated load capacity charts, recommended operating speeds and other pertinent safety warning stickers/placards must be visible, legible, and written in English.
- Reckless driving, horseplay, or any actions that contribute to the distraction of heavy and mobile equipment operators or other third-party entities is strictly prohibited.

Contractors are prohibited from utilizing or operating tools or equipment owned, rented, or leased by ET. Contractors must procure the proper tools and equipment to complete their work or services. Exemptions to this requirement may include the following, with prior approval from the Director responsible for the work or services contemplated: (1) use by a third-party individual retained directly by ET as a third-party contractor (where such individual is not working for or through a third-party services contractor or vendor) OR (2) a Contractor providing services in an area or at a site where the use of ET equipment is a necessity such as pump rooms with gantry cranes or the like.

7.18.1 Spotters / Flaggers

Spotters must be trained to identify hazards that may impact the operation of heavy and Mobile Powered Equipment in construction areas or in other places where equipment may contact and damage foreign obstructions such as overhead power lines, underground pipelines, or utilities and/or third-party encumbrances such as homes or buildings, utility poles, trees, boulders, concrete embankments, etc.

7.18.2 Steep Slope Terrain

Ground conditions must be assessed before beginning any work. Develop and implement a Safe Work Plan if the incline/decline from grade is found to be more than that which constitutes safe working conditions for the equipment, materials, and/or personnel who will be expected to work in the area. The plan must provide instruction for the safe use of equipment, materials, and personnel as well as directions for the winching of heavy equipment and personnel up and down steep slopes. Dangerous sloping conditions shall be identified before the beginning of actual work.

7.18.3 ATV / UTV Requirements

The equipment manufacturer's safety and operating recommendations shall be always followed, specifically concerning operating conditions, speed, and safety equipment.

- All safety equipment provided by the manufacturer shall be maintained in operable condition. If the integrity of the safety equipment becomes compromised in any way, it shall be replaced.
- Vehicles must be "side-by-side" seating with a hand wheel for steering control.
- Daily inspections and JSAs must be completed by the personnel expected to operate the equipment.
- All general safety requirements for the operation of the vehicle shall be always obeyed.
- All original and proper warning signs "must" remain affixed to the equipment.
- Proper PPE, including but not limited to a DOT-approved helmet, shall be worn while operating the vehicle. All occupants of the vehicle must wear the same PPE as the driver.

7.19 Prohibitions

- No alcoholic beverages, illegal drugs and/or un-prescribed medication, (including paraphernalia and empty cans), will be allowed on ET's assets. This includes facilities and/or Rights of Way during construction projects.
- No fishing in privately owned ponds; no firearms or weapons of any kind; no hunting; no pets (including service animals) will be allowed on Energy Transfer assets. This includes facilities and/or Rights of Way during construction projects.
- Although we recognize the need for personal cell phones at work, employees should use them intermittently at designated locations or outside working hours. Employees should refrain from engaging in any practice or activity that diverts their attention from their task.

8 OCCUPATIONAL HEALTH AND ENVIRONMENTAL CONTROLS

8.1 Hazardous Atmospheres

While visiting or during work activities at many ET facilities, Contractor and Subcontractor personnel may be exposed to hazardous atmospheres.

The following is a list of potential hazardous atmospheres workers may encounter. When the potential for exposure to any of these agents exists, each affected worker shall be properly trained in the appropriate recognition and response procedures and exposure mitigation methods:

- Hydrogen Sulfide (H_2S)
- Benzene
- Nitrogen and other inert gases
- Explosive Vapor
- Oxygen-deficient atmospheres

This summary does not include potential exposure scenarios that are created by contractors or Subcontractors during work activities. It shall be the sole responsibility of the Contractor and/or Subcontractor to assess and mitigate exposures to hazardous atmospheres that occur because of Contractor/Subcontractor construction or maintenance activities.

8.2 Noise Exposure

Each Contractor and/or Subcontractor shall protect against the effects of elevated noise exposure following the applicable sections of OSHA 29 CFR 1910.95 General Industry or 29 CFR 1926.52 Construction when the sound levels exceed those shown in the table below for the duration as stated. Alternatively, hearing protection will be required in all posted areas regardless of existing noise levels unless Operations personnel permit otherwise.

Permissible Noise Exposures

Maximum Duration Exposure in Hours	Exposure Level in Decibels (dB)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
0.5	110
0.25	115

Exposure to impulse or impact noise should not exceed 140 dB peak sound pressure level.

8.3 Ionizing Radiation, S-280

While performing activities involving the use of sources of radiation, the pertinent provisions of the Nuclear Regulatory Commission Standards for Protection Against Radiation (10 CFR Part 20) relating to protection against occupational radiation exposure, shall apply.

Any activity that involves the use of radioactive materials or X-rays, whether under license from the Nuclear Regulatory Commission, shall be performed by competent persons specially trained in the proper and safe operation of such equipment. In the case of materials used under Commission license, only persons licensed or competent persons under the direction and supervision of the licensee shall perform such work.

8.3.1 Ventilation

Whenever ventilation is used to control dust, fumes, mist, vapors, and/or gases that exist or that are produced in the course of work activities above the “Threshold Limit Values of Airborne Contaminants”, the installation and operation of the ventilation equipment shall meet or exceed the requirements of 29 CFR 1926.57.

8.4 Asbestos/Lead

It is the responsibility of ET to identify areas where Asbestos-containing materials (ACM) or Lead is located or may be present and to inform contractors/Subcontractors of the presence and location of the ACM or Lead.

Only contractors and associated personnel that have been contracted by ET shall be tasked with the removal of ACM or Lead following the applicable federal, state, local, and ET rules and regulations.

Applicable OSHA Standards:

- **ACM** - General Industry 1910.1001; Construction 1926.1101
- **Lead** - General Industry 1910.1025; Construction 1926.62

8.5 Respiratory Protection

Each Contractor/Subcontractor shall evaluate respiratory hazards associated with their scopes of work and relevant workplace and user factors. This evaluation shall include a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form.

Each Contractor/Subcontractor that identifies the need for respirator use shall establish and maintain a respiratory protection program that includes the requirements listed in 1910.1349(c) and is inclusive of each employee required to use a respirator. Additionally, the Contractor will provide for a medical evaluation following the requirements of 1910.134(e) before fit testing or requiring personnel to use a respirator in the workplace. All personnel required to use a negative or positive pressure tight-fitting

face-piece must be fit-tested under the requirements of 1910.134(f). Training shall be provided to each affected person following the requirements of 1910.134(k) including procedures for proper use under 1910.134(g) and proper maintenance under 1910.134(h).

8.6 General and Hot Work Permits

When required by ET safety procedures, all Contractors and Subcontractors shall obtain and adhere to applicable work permit requirements. Work permits are good for one work shift (maximum of 12 hours). Permits may be revalidated at the end of that time for a maximum of four additional hours if all permit conditions are reviewed and remain the same. Work Permits are immediately rescinded, without notice, when work site conditions change or an emergency occurs. Generally, work permits are issued for two reasons, General and Hot Work within designated areas will be completed, issued, and controlled by Operations personnel.

8.6.1 General Work Permits

General work permits are commonly issued to serve as written authorization to perform work in designated areas that do not involve Hot Work. Each permit will give a general description of the work to be performed, where and when the work is to take place, special precautions, required personal protective equipment, and emergency information.

8.6.2 Hot Work Permits

Hot Work Permits are required and must be issued by local Operations personnel or other personnel (when authorized by Operations personnel) before commencing any Hot Work activities. Hot Work is generally defined as any work that involves the use of open flames or other sources of ignition with the potential to generate a spark, heat, or static electricity that could cause a fire or explosion. Contractors/Subcontractors performing Hot Work are responsible for the safe execution of the designated tasks. If an unsafe or potentially unsafe condition arises, such as any LEL exposure that is > 10%, it requires verification of the source of exposure, a defined work plan with JSA, and the Manager (or above) review and approval before permit issuance can be considered. No work will be allowed when LEL exposure is>20% and must be reported to an ET representative.

9 INSPECTION, TESTING, AND MONITORING

9.1 Atmospheric Monitoring

Contract personnel are responsible for equipping themselves appropriately to manage hazards, which may include the use of personal gas monitors. If hazards are identified during the Job Planning or Work Permit Process the use of a portable, personal, or area monitor may be applicable. If a hot work permit is required, then as per S-370 monitoring using a handheld gas detector with active sampling pumps shall be used for initial monitoring and continuous monitoring when required.

Contractors and subcontractors must maintain and calibrate gas monitors according to the manufacturer's specifications. They must also provide proof of calibration sheets upon request and ensure that monitors are bump tested on the day of use on ET assets.

9.2 Workers Compensation Insurance Coverage

All contract employees, including Subcontractors and self-employed personnel, must be covered under suitable worker's compensation policy arrangements. The primary contractor will verify evidence of worker's compensation policies for subcontractors.

9.3 Regulatory Agency Inspections

If a regulatory entity (RE) representative visits any Energy Transfer asset, the Contractor and/or Subcontractor representative shall immediately notify the appropriate ET representative and request that the RE representative present credentials that identify them and the agency they represent and if they would please await ET representative's arrival before accessing ET facilities. If the RE representative refuses to wait and demands access, the contractors most senior Contractor/Subcontractor representative shall always escort the RE representative while a ET representative is absent. It is ET's policy to cooperate with authorized regulatory agency inspectors. At no time shall Contractor/Subcontractor management or their personnel become combative, uncooperative, impolite, or act in a manner that is contrary to acceptable professional behavior.

In almost all cases, it is a requirement that the RE representative be requested to watch the visitor's portion of ET orientation and be informed of the site-specific elements that may impact him/her during their visit.

Documentation of compliance with this requirement shall be in the form of a completed Personal Acknowledgement Form and Orientation checklist and field verification tools can be issued if available. The Contractor / Subcontractor will provide personal protective equipment for the RE representative, at no cost to the RE representative, if required. All efforts should be made to accommodate the RE's requests for access unless the areas are hazardous and the proper mitigation measures cannot be obtained, e.g., no fire-retardant clothing.

If violations of applicable standards/regulations are observed by the RE representative, the Contractor/Subcontractor shall take immediate action to correct them. If the RE representative takes samples (e.g., soil) or performs monitoring (e.g., noise) the Contractor/Subcontractor shall verify the sample collection by requesting a split sample or by performing parallel monitoring. Additionally, if the RE representative takes photos every effort should be made to take a similar photo at the same time, from the same angle, under the same lighting and environmental conditions.

9.3.1 Post-Inspection Requirements

If an ET representative was not in attendance during the regulatory inspection:

- The Contractor/Subcontractor shall provide, in writing to the appropriate ET representative, all pertinent review results as soon as practical after the closing meeting, but at no greater interval as 24 hours after occurrence.

- If a citation was issued during or after the inspection event, the Contractor/Subcontractor shall notify ET representative immediately.

Regardless of whether an ET representative attends the inspection event:

- The Contractor/Subcontractor representative shall document in writing and confirm with ET representative all potential and actual violations noted during the inspection event. Listed items should include both written and oral observations made by the RE representative and a summary of any samples the RE collected and whether reciprocal samples were collected.

If samples were collected, the type of sample collected (air, water, soil, picture, etc.) must be reported and the alleged or suspected / contaminant(s) stated. A timeline for analysis must also be reflected in the report.

If samples will not be analyzed immediately, approved preservation methods must be implemented.

The Contractor/Subcontractor shall provide a report to the applicable ET representative that describes the following:

- Mitigation methods that will/have been taken to correct any real or perceived findings

- Assignment of mitigation tasks to applicable and responsible parties

- Timeline for completion of stated action items and anticipated compliance deadline.

9.4 Incident Reporting and Investigation

All incidents must be documented and reported to the appropriate ET Representative as soon as practical after the event has occurred. An initial report shall be submitted within 24 hours after occurrence. This "Initial Incident Report" need only contain information that has been discovered and immediate mitigation steps that have been taken in the last twenty-four hours since the incident occurred; it should only contain the facts of the incident and not contain any conjectures and at minimum, the information found in the example ET Work Related Injury or Illness Form (on the Extranet site).

All workplace injuries and all serious Near-Miss incidents shall be investigated. Incidents requiring an investigation shall include Causal Analysis and Actionable Items that are based on the root cause of the incident. The timeline for submittal of these reports will be

within 72 hours after the incident. Depending on the severity of the incidents the contractor can request a written extension of time from ET Safety Management.

9.4.1 Two-Hour Notification Deadline

In cases of a Fatal(s) event, heart attack, or other events that require the notification of OSHA as outlined in 1904.39, the Contractor must notify ETs Corporate or Construction Safety Department as soon as practical but not more than 2 hours after the event.

Any referenced notification will not release the Contractor from his/her obligation to notify ET / Project management personnel or the Contractor's obligation to notify OSHA of the event.

9.5 General ET Contact Information

9.5.1 Corporate Contacts

Engineering & Construction Safety	713-989-7926 or 405-576-8144
Legal	713-989-7000
Contracts	713-989-7000
Insurance	713-989-7000

9.5.2 Pipeline Emergencies

ETC Liquids	1-888-844-8134
Fayetteville Express Pipeline	1-888-844-8030
Florida Gas	1-800-238-5066
Houston Pipeline	1-800-392-1965
Lone Star NGL	1-877-839-7473
Panhandle Eastern, Sea Robin, Trunkline	1-800-225-3913
San Antonio Gas Control, SEPTS, ET Fuel, Oasis	1-800-375-5702
Tiger	1-888-844-3735
Transwestern	1-866-999-8975
West Virginia	1-800-375-5702

10 ENVIRONMENTAL

This section is to provide the Contractor and their subcontractors (Contractor) with basic environmental requirements related to projects. This document is not intended to replace or supersede any ET Engineering Standards, Federal, State, and Local laws, regulations, or permit requirements.

10.1 General Requirements and Expectations

ET expects that all contractors will perform their duties in a manner that is compliant with all applicable laws, regulations, permit requirements, and ET Engineering Standards. The Contractor shall ensure compliance with all applicable Federal, State, and Local laws and regulations and permit documents as required for the project. If the Contractor has questions related to any environmental aspect of the project, it is the responsibility of the Contractor to seek clarification from a ET Environmental Representative.

The Contractor shall maintain a clean, organized, and safe worksite.

10.2 Permit Compliance

The Contractor will be provided copies of all ET-obtained environmental permits. If the Contractor obtains any environmental permits or authorizations related to the project, copies will be immediately provided to ET. The Contractor shall review and comply with all environmental permits, conditions, laws, regulations, and ET requirements as part of the project. Copies of all environmental permit documents shall be maintained onsite.

In no case shall the Contractor deviate from the approved permit documents without review and approval by a ET Environmental Representative.

10.3 Erosion and Sedimentation Control

The Contractor must perform work following the soil erosion and sedimentation plans or Stormwater Pollution Prevention Plans (SWPPP) as part of the project and in compliance with all environmental permits, conditions, laws, regulations, and ET requirements as part of the project.

The project Limits of Disturbance (LOD) shall be marked before prior construction begins and no work shall be conducted outside the LOD without prior approval from a ET Environmental Representative. The Contractor shall only utilize approved access roads, parking, and staging areas. Any work exclusion areas shall be delineated (e.g., orange construction fencing) to prevent unintended entry.

Erosion and sediment controls must be installed before earth disturbance activities and maintained throughout the project under the approved plans and permits. It is the Contractor’s responsibility to reduce erosion and sedimentation.

Clear and grade only areas necessary for construction and within the project Limits of Disturbance (LOD). Topsoil shall be segregated from subsoils for use during the restoration phase as required by permit or regulation.

Disturbed areas must be stabilized and re-vegetated where applicable, as soon as possible following construction in compliance with permit conditions, local ordinances, ET requirements, or following landowner requirements.

10.4 Wetlands and Waterbodies

The Contractor must be aware of all wetlands and waterbodies located within the extent of earth disturbance and protect these areas from unintended tree clearing, disturbance, routine vehicular traffic, and sediment discharges. Before initiating earth disturbance in a wetland or waterbody, contractors must review all permit documents to ensure understanding of permit conditions, crossing techniques, and site restoration specifications. contractors are expected to execute all impacts in compliance with all applicable permit requirements and regulations.

Once commenced, contractors shall minimize disturbance to a practical extent necessary to expeditiously complete the work. The Contractor must ensure that all best management practices such as silt fences, water bars, timber mats, bridges, dewatering areas, etc., are in place before commencing the work.

No wetland or waterbody crossing technique may be changed without review and approval by an authorized ET Environmental Representative.

10.5 Work Site Dewatering

The contractors shall dewater work areas following the plans and in compliance with all environmental permits, laws, regulations, and ET requirements as part of the project. Dewatering should be conducted as far as practical from waterbodies and sensitive areas. The Contractor shall always monitor the dewatering operations and discharge location to ensure that erosion is minimized. Dewatering operations are to immediately cease if sediment-laden discharge threatens a waterbody or sensitive area or if erosion is starting to occur.

10.6 Trenchless Installations

The Contractor shall plan and execute Horizontal Directional Drills (HDD) following Engineering Standard *Horizontal Directional Drilling, Planning, and Execution* C4.0111 and all permit requirements. The Contractor shall maintain a copy of the Company approved Drilling Plan at the drill location which includes the list of approved additives and associated safety data sheets (SDS) for those products. The Contractor shall not deviate from the Drilling Plan without review and approval by an authorized ET Environmental Representative and the Project Manager. The presence onsite or use of unapproved additives or changes to drilling techniques without ET approval is strictly prohibited. All drilling fluids must be managed under Federal, State, and Local laws, regulations, and permit conditions. Stop work authority shall be used if an unapproved additive is observed or used onsite.

10.7 Ecologically Sensitive Areas

The contractors shall be aware of any ecologically sensitive areas such as parks or wildlife areas, migratory bird areas, threatened and endangered species, or other sensitive habitats that exist near or within the project. The Contractor shall protect these areas and understand all permit conditions, work practices, or restrictions that may affect the construction of the project.

10.8 Cultural and Archeological Resources

The contractors working in or near any site that could contain cultural and/or archeological artifacts shall proceed with caution. Any known sensitive areas of the project shall be protected from disturbance during construction. If cultural or archeological artifacts are discovered during construction, work shall immediately cease, and ET representatives shall be notified. Under no circumstances, shall any cultural or archeological artifacts be removed from the site.

10.9 Hydrostatic Test Dewatering

The contractors shall conduct hydrostatic test dewatering following Engineering Standard *Pressure Testing Execution* C4.0105. Hydrostatic test water may be disposed of offsite at a permitted treatment facility or discharged into the environment. Discharging hydrostatic test water onto the ground or into a waterbody may require an NPDES discharge permit. All permit-specific requirements shall be followed. The contractor shall coordinate in advance of the planned test with ET Environmental Representative on how the hydrostatic test water is planned to be managed.

10.10 Pollution Prevention / Spill Response

The Contractor shall minimize the risks of spills, leaks, or releases to the environment and shall employ the appropriate protective measures and inspection to prevent such an occurrence. All containers of hazardous materials and petroleum products should be stored in a manner that prevents a release to the environment. The Contractor shall have spill response kits readily available on the project.

For any project that requires a Spill Plan, including but not limited to a Spill Prevention Control and Countermeasures Plan (SPCC) or SWPPP, the Contractor shall prepare a project Spill Plan following State and Federal regulations which shall be adhered to for the duration of the project. A copy of this plan shall be provided to ET for review.

The Contractor shall perform all transfer activities, including refueling and maintenance activities in approved or designated areas. All equipment must be maintained to prevent leaks.

In the event of a spill, leak or release the Contractor should ensure the safety of all personnel, immediately notify the appropriate ET Environmental Representative, and implement the spill response plan.

Fire protection foams containing perfluoroalkyl and polyfluoroalkyl substances (PFAS) are not permitted to be onsite or used.

10.11 Waste Management

The Contractor shall implement waste minimization practices throughout the project by ordering only the amount of chemicals or other materials needed to complete the work, returning any unused chemicals or other materials to the vendor, or reusing, recycling, or reclaiming materials when possible.

The Contractor must manage all project-related wastes in compliance with all environmental permits, laws, regulations, and ET requirements as part of the project.

The Contractor shall coordinate with ET Environmental Representative to ensure all waste generated during or in connection with the work is properly characterized, managed, stored, transported, and disposed of at a ET-approved disposal facility. The Contractor shall not discharge any materials to water or soil that are not permitted or otherwise authorized by permit or regulation. In some cases, the Contractor may be required to develop a Waste Management Plan.

Wastes include but are not limited to Naturally Occurring Radioactive Material (NORM), Asbestos Containing Materials (ACM), polychlorinated biphenyls (PCBs), lead, universal wastes, construction debris, hazardous wastes, used oil, E&P-exempt wastes, and contaminated soil.

If unanticipated or undocumented disposal areas, mine voids, acid mine drainage, evidence of past spills, or abandoned industrial operations are discovered, the Contractor shall promptly cease work in the affected area and notify ET Environmental Representative for direction.
The Contractor shall provide all waste disposal records to ET upon receipt.

10.12 Agency / Regulatory Inspections

In the event of a regulatory inspection or audit, the Contractor shall fully cooperate with the authorized regulatory authority. The Contractor shall immediately inform their ET Environmental and Safety Representative of the regulatory representative's presence on the project. The Contractor is required to ensure that inspections are given high priority and are handled professionally.

The Contractor should ask the regulatory representative for applicable credentials, have them sign the visitor log, and advise of all safety requirements and PPE.

Once the inspection is completed and before the regulatory representative's departure, the contractor should review any findings, violations, and/or corrective actions resulting from the inspection.

10.13 Training

The Contractor shall ensure that personnel have an appropriate level of competence in terms of education, training knowledge, and experience. The Contractor should review all applicable permit requirements, rules, regulations, and ET Standards with the appropriate onsite personnel.

If project-specific training is required by regulation or permit conditions, the Contractor shall notify ET representative when all new workers are brought onto the project so they may receive the required training before beginning work.

10.14 Environmental Incident Notification / Reporting

The Contractor shall immediately notify the appropriate ET Environmental Representative in the event spill or non-compliance event. ET Representative shall review the situation and make any notifications to the appropriate agencies. The Contractor shall provide any required documentation and information related to the event to ET Environmental Representative. It is the responsibility of the Contractor to take any immediate corrective actions to remediate the non-compliance situation.

10.15 Stop Work

The Contractor must ensure that all personnel have the authority and responsibility to Stop Work for any environmental reason without repercussion. ET shall be notified any time that Stop Work authority has been utilized.

10.16 Landowner Concerns / Public Interest / Media

If a landowner, member of the public, or media approaches any Contractor personnel during construction with concerns, complaints, or inquiries, the Contractor shall obtain the person’s name and contact information, the nature of the concern or complaint, and immediately notify ET Representatives. The Contractor should not offer any comment, suggestions, or resolutions and advise the individual that the information will be passed along to ET.

10.17 Pre-Construction / Pre-Job Meetings

Pre-construction meetings are to be held in advance of the commencement of construction. These meetings should include key members of the project team responsible for day-to-day construction activities such as the Contractor management team, ET management, inspection staff, other ET support, and regulatory agency personnel as necessary. Additionally, pre-job meetings should be held in advance of the commencement of critical or special work activities or tasks and may be incorporated as part of daily tailgate meetings.

The purpose of these meetings is to ensure proper planning has been conducted, all parties understand the scope of work, permit and regulation requirements, roles and responsibilities, notification requirements, etc. to ensure successful and compliant execution of the work.