



PROVIDING MORE

Health, Safety and Environment Management System

HSE Requirements for Contractors (HSE)

RELATED DOCUMENT

APPROVAL AND VERSION HISTORY

MS21-PRO1-RD1-HSE Requirements for Contractors (EUSA)		Version # 01
Approved by: Abe Miller	(signature)  Associate Director and Health & Safety]	Effective Date: 13-MAY-2026

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 PROVIDING MORE	HSE Requirements for Contractors	RELATED DOCUMENT
		MS21-PRO1-RD1-HSE Requirements for Contractors (EUSA)
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1.0 PURPOSE

EPCOR USA (EUSA) has established a management system which documents, implements, maintains and continuously improves Health, Safety and Environmental (HSE) performance. The following requirements have been established in order to identify the programs, processes, and practices that EUSA Contractors have in place to support this management system.

2.0 SCOPE

The requirements outlined in this document apply to all Contractors engaged in low and high Consequence work. Depending on the work involved, there may be additional requirements not outlined in this document. A Contractor, for the purposes of this document and unless otherwise specified, refers to a Contractor(s) and a Subcontractor(s).

All Contractors will be required to comply with all applicable HSE legislation, regulations, codes, standards and mandated requirements, as well as all EUSA HSE Requirements and associated EUSA Standards and Procedures as the minimum expectation. Contractors are required to implement and manage their own HSE programs and to adhere to the most stringent requirements.

Where an EUSA Business Unit enters into a contract agreement provides a service for another Business Unit owned and operated by EPCOR, the Business Unit providing the service may be exempt from certain requirements outlined in this document.

EUSA, at its discretion and without prejudice or penalty, may stop work, impose a Safety Stand Down (or “reset”), and/or refuse work site access to Contractors or workers, if deemed necessary, for the purpose of restoring order and ensuring that work will continue safely.

3.0 METHOD

3.1 MANAGEMENT COMMITMENT - POLICIES

3.1.1 EPCOR Health, Safety & Environment (HSE) Policy

Nothing is more important to us than the health and safety of our employees, contractors, and the public. Getting home safely and protecting the public and the environment are responsibilities we all share.

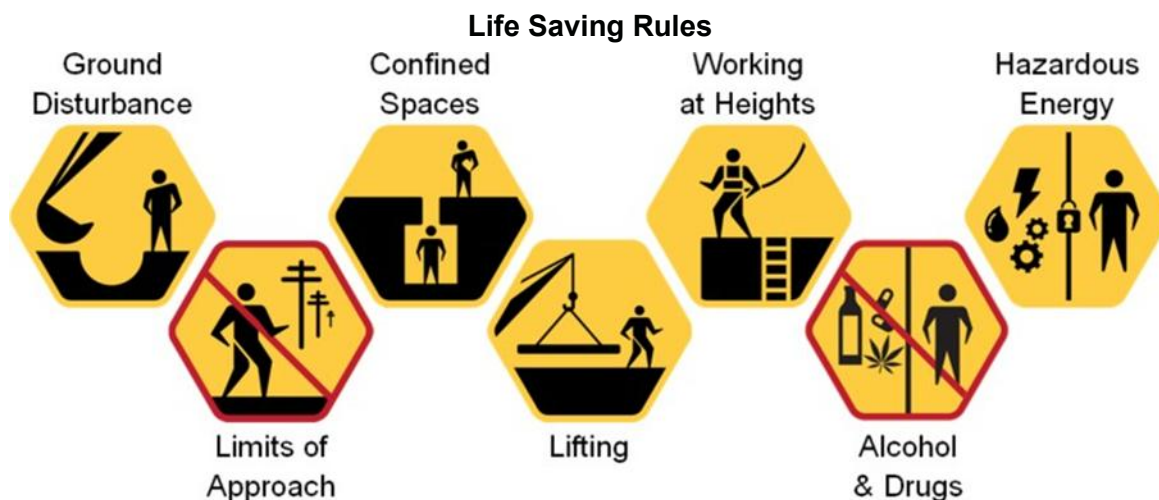
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- [EPCOR Health, Safety & Environment \(HSE\) Policy](#)

3.1.2 Life Saving Rules

These seven Life Saving Rules (LSRs) will help EUSA on our journey to a workplace free of occupational injury and illness by holding all employees and contractors accountable to the most basic of safety standards. There will be accountabilities and consequences for violations.



3.1.3 [Ethics Policy](#)

3.1.4 [Privacy Policy](#)

3.1.5 [Respectful Workplace Policy](#)

3.1.6 [Alcohol and Drug Standard](#)

The Contractor shall comply with the EPCOR Alcohol and Drug Standard for Contractors, including pre-access testing for safety sensitive positions. The Contractor shall ensure that all workers under their control and/or direction are fit for duty while performing work. The requirements of a Contractor's Alcohol and Drug Program are described on the EPCOR website.

3.1.6 Environmental Protection and Reporting

The EUSA Owner Representative, or designate, shall be immediately notified by the Contractor of any environmental impacts, including but not limited to releases or spills of hazardous substances into the environment. The Contractor shall ensure compliance with all aspects of the environmental legislation, regulations, codes, standards, and any other mandated requirements ("Environmental Laws") are complied with including establishing any required procedures and control systems and performing any required employee training.

The Contractor will be responsible to report all releases, spills, and other environmental

violations on or about the work site in accordance with applicable Environmental laws. Copies of all reports are to be submitted to the EUSA Owner Representative.

3.1.7 Hazardous Wastes

The Contractor shall ensure that all hazardous wastes generated at the work site and unused hazardous chemicals are removed, transported and disposed in accordance with applicable legislation in the jurisdiction in which the work is being performed. The Contractor shall be responsible for compliance with the requirements of all applicable hazardous waste disposal legislation, or other applicable law, for waste generated on the work site as a result of the construction, or any other activity. A copy of the necessary documentation (i.e. Hazardous Waste Manifest) must be submitted to the EUSA Owner Representative.

3.1.8 Smoke-Free Workplace

Contractors must comply with the EUSA Smoke-Free Workplace Policy and applicable state regulations.

- **Prohibited Areas:** Smoking and the use of electronic vaping devices are strictly prohibited inside all EUSA facilities, company vehicles, and enclosed contractor structures.
- **Designated Smoking Areas:** Smoking is permitted only in explicitly designated outdoor areas. These areas must be located a minimum of 20 feet from all building entrances, operable windows, and ventilation/HVAC intake systems to ensure compliance with the [Smoke-Free Arizona Act](#), the New Mexico- [Dee Johnson Clean Indoor Air Act](#), and applicable Texas municipal ordinances.
- **Signage Requirements:** Clear and conspicuous “No Smoking” signage, or the international “No Smoking” symbol, must be visibly posted at all primary building entrances and restricted zones. Contractors establishing temporary work trailers or field offices must post compliant signage at their respective access points.
- **Receptacles and Disposal:** Approved, non-combustible smoking receptacles must be placed exclusively within the designated smoking areas. Receptacles must not be located within the 20-foot restricted perimeter of any building entrance or air intake. Contractors must ensure all smoking materials are completely extinguisher and disposed of in these approved receptacles to mitigate fire risks and maintain site housekeeping.

3.2 PUBLIC, VISITORS AND CONTRACTOR EMPLOYEES

3.2.1 Contractor Responsibilities

The Contractor is responsible for ensuring that their workers and Subcontractors comply with all applicable HSE legislation, regulations, codes, standards, and mandated requirements within the jurisdiction for where the work is being executed.

The Contractor shall enforce and ensure compliance with all applicable safety rules and

OSHA Regulations (29 CFR 1910, 1926 and 1904), DOT/PHMSA (49 CFR 171-180) as well as any state or local requirements that are equal to or more stringent than federal OSHA standards, by all workers under their supervision who will be on the work site and/or involved in the work.

- Work in accordance with applicable EPCOR policies, standards, procedures and contract condition during the execution of the scope of work
- Comply with EPCOR HSE Requirements and Contractor Management Standard
- Ensure workers, all subcontractors under their control, and other workers, visitors, and the general public are not subjected to injury or illness as a result of contractor operations
- Utilize competent supervisors and workers and have training records/certification available
- Ensure tools and equipment brought onto the work site are operated and maintained in accordance with the manufacturers' specifications
- Ensure corrective/preventative actions are completed in a timely manner
- Manage environmental aspects and impacts of the work on the environment
- Evaluate, monitor, measure and enforce compliance of all subcontractors
- Provide all requested Occupational Safety and Health Administration (OSHA) information to EUSA that is relevant to the scope of work
- Develop site-specific safety plans relevant to site hazards and scope of work
- Report all incidents, injuries, non-compliances and/or regulatory visits to Owner Representative

3.2.2 Subcontractor Management

Contractors are responsible for ensuring their subcontractors meet all EUSA HSE requirements through one of the following methods:

- ISNetwork Sub-Tracker (Preferred): The Contractor ensures their high-consequence subcontractors are subscribed to ISNetwork (ISN) and links them via the ISN Sub-Tracker tool. This provides EUSA with automated visibility into the subcontractor's grading and insurance status.
- Contractor-Managed Verification (non-ISN Subcontractors): If a high-consequence subcontractor cannot subscribe to ISNetwork (e.g., specialized service, one-time use), the Contractor must vet them manually using the following process:
 - The Contractor must complete the Subcontractor HSE Assessment Form (Appendix 9) 10 days prior to the subcontractor starting work. This form validates the subcontractor's

insurance coverage, safety statistics (TRIR), and regulatory history

- If the assessment identifies gaps (e.g., high TRIR, missing safety programs), the Contractor must submit a mitigation plan outlining how they will manage the specific risks associated with that subcontractor

While work is in progress, the contractor is required to inform the EUSA Owner Representative of any negative change in registry status of a subcontractor. If the item cannot be resolved, a mitigation plan must be completed by the Contractor.

EPCOR Sub-Tracker FAQ's

3.2.3 Supervision

The Contractor shall advise EUSA, in writing, of the person(s) who will ensure overall scope/project/site supervision and compliance with HSE requirements while work is in progress. This should include the Contractor Representative(s) who are to ensure safe performance of all work on the work site. A 24-hour emergency telephone number(s) shall be provided. EUSA reserves the right to approve or reject the Contractor Representative(s).

3.2.4 Visitors to Work Site

All visitors to the work site shall follow the established safety procedures in place for the work site including, but not limited to:

- Site-specific safety orientation(s)
- Job Hazard Assessment(s)/Site Specific Safety Plan(s)
- Site Emergency Response Plan(s)
- PPE requirements

Note: All visitors shall be accompanied by a competent worker for the duration of the visit.

3.3 HAZARD ASSESSMENT

3.3.1 Hazard Assessments

Prior to work commencing, a formal pre-job hazard assessment must be completed to include the assessment of inherent (mandatory) risks and residual (recommended) risks. At the work location, a daily Job Hazard Assessment must be completed by the Contractor(s) involved in the work. These processes must identify the health, safety and environmental hazard of the work site, the risks posed to the workers, and the appropriate controls to mitigate the risks. Additional risk assessments must be performed during the course of the work as site/environmental conditions, work scope, key site personnel, schedule, and/or tools/equipment/materials change. This can be accomplished by the completion of:

- Job Hazard Assessments (JHAs)

- Safe Work Plans (SWP)
- Site Specific Safety Plans (SSSP)
- Field Level Hazard Assessments (FLHA)

If the work site is shared by or is adjacent to another work site(s), the JHA must take into account any hazards associated with the activities of the other work sites(s).

3.3.2 Environmental Aspects and Impacts

Prior to commencing work that may pose an environmental risk, a written formal environmental aspect and impact analysis may be completed by the Contractor(s) involved in the project. This process must identify the environmental aspect of the work to be performed, and the associated environmental permitting or approvals required for the work. The potential environmental impact must be determined based on probability and severity (i.e., risk) and controls must be established to eliminate or reduce any negative environmental risk to an acceptable level.

The Contractor(s) involved in the work must have on hand and available to workers all environmental permitting and approvals that are required, prior to beginning the work.

3.3.3 Occupational Health and Hygiene

- Health
 - The Contractor shall establish appropriate health procedures to address issues such as:
 - Ergonomics/musculoskeletal injury
 - Employee fitness to work
 - Exposure to occupational hazards such as noise, chemicals, radiation, biohazards, etc.
 - Hearing conservation program if workers are exposed in excess to Lex of 85 dBA. If workers require respirators, workers are required to have completed a health screening and proper fit testing on the respiratory protection they will be using

- Hygiene

The Contractor shall ensure that exposure to chemical, biological, radiation and noise occupational hazards, which are or may be present at the work site, are adequately controlled to protect the health and safety of workers. If there is a potential for worker exposure and the Contractor is unsure if workers are exposed to chemical, biological, radiation and/or noise hazards, the Contractor must have hygiene sampling or monitoring conducted to evaluate if a worker exposure issue exists. The Contractor shall develop

control plans which include hazard assessments, worker education, safe work practices, clean up, decontamination, and disposal, as required. Sampling reports shall be made available to EUSA, upon request.

Contractors shall ensure monitoring methods for applicable airborne contaminants, such as hydrocarbon or chemical vapors and dusts are conducted if necessary and shall take immediate corrective action if monitoring shows unacceptable levels of airborne contaminants. Should monitoring of these contaminants be necessary, only workers who are competent in conducting an assessment and interpreting the results shall carry out such work. All appropriate records shall be submitted for review by EUSA, upon request.

Contractors shall develop gas monitoring equipment procedures for hygiene and/or confined space entry that include maintenance, calibration, and use (including pre-use bump testing) in accordance with the manufacturer's specifications. Instruments which require service or are defective shall be immediately taken out of service, tagged, and removed from work site for repair/calibration before reuse.

3.4 HAZARD CONTROL

The Contractor shall ensure operational controls are in place for any hazards arising from the scope of work being performed or at the work site. Workers on the work site who are exposed, or potentially exposed, to these hazards shall be familiar with and follow the JHA(s). Documentation shall be made available to EUSA, upon request.

3.4.1 Abrasive Blasting

Before beginning any abrasive blasting operation the Contractor shall:

- Conduct a Job Hazard Assessment, which may include sampling, to ensure the blasting can be done safely
- Ensure that the blasting operator wears a blasting hood which has an adequate supply of suitable breathing air at sufficient volume and pressure to maintain positive pressure in the hood
- Ensure that the blasting operator wears sufficient PPE to protect against noise and accidental contact with the abrasive material flow
- Maintain breathing air equipment that passes an annual breathing air certification
- Ensure that the blasting operation does not contaminate the air for other workers, by providing a separate enclosure or by other suitable means
- Ensure used abrasive material is disposed in accordance with environmental requirements

3.4.2 Aerial Work Platforms

The Contractor shall ensure that workers in boom-supported platforms (including fork-

mounted platforms supported by a boom) are required to use a personal fall arrest system due to the possibility of being ejected out of the platform while working at height, as guardrails alone may not be sufficient to protect the worker. A fall protection plan is required whenever workers are required to wear fall protection equipment. EUSA sites may also required a personal fall protection system for aerial lifting platforms (i.e. scissor lift).

3.4.3 Asbestos

If asbestos containing materials (ACM) which might include duct lines, concrete water and sewer mains, cable insulation, cinderblock insulation, stucco and plaster, process or hydronic piping insulation, grout, packing, or gaskets are to be impacted or disrupted (i.e., through cutting, shaping, installing and/or removing the ACM), appropriate procedures must be utilized to handle the material. The procedures developed and utilized shall comply with the appropriate legislated requirements for the jurisdiction where work is being performed.

The Contractor shall ensure that when work requires the encapsulation, enclosing, alteration or removal of asbestos material, such removal is to be executed by trained abatement personnel only. Job specific procedures shall be developed in accordance with applicable OSHA legislative requirements for asbestos abatement, for the jurisdiction in which the work is being performed.

The asbestos abatement work must be supervised by a competent occupational/industrial hygienist. Air sampling must be conducted as per federal or state OSHA legislative requirements, and EUSA must be provided with copies of all related documentation including notice of project, air sampling results, and waste manifests. Respiratory protection with appropriate cartridges is required for all asbestos work.

3.4.4 Chemical Hazards

The Contractor shall ensure that all controlled products which are brought into the work site are stored, used and handled in accordance with manufacturer's recommendations and GHS requirements.

- **Safety Data Sheets:** The Contractor shall have all Safety Data Sheets (SDS) accessible to all workers at the work site for controlled products brought onto or used at the work site. The Contractor shall provide copies of the SDS to the EUSA Owner Representative, upon request
- **Use and Storage of Flammable Substances:** The Contractor shall ensure that the hazards associated with the use of flammable substances are clearly assessed and that controls are implemented to ensure the safety of workers, materials and equipment at the work site. Flammable substances shall be stored in approved containers and rags contaminated with flammable substances shall be stored in suitable metal containers with adequate covers. Flammable substances may not be stored with incompatible substances/materials. Sparks from "hot work" operation shall be controlled in a manner which prevents fire and worker injury.

- GHS Labels: The Contractor shall ensure that controlled products present at the work site are identified with either a WHMIS 2015 (GHS) approved supplier or a work site label.

3.4.5 Codes of Practice/Standards

Codes of Practice/Standards must be available at work sites, for the scopes of work involving:

- Confined Space entry
- Respiratory Protection
- Hazardous (designated) chemicals (e.g.: asbestos, lead, silica, hydrogen sulfide, etc.)
- Others as required under the applicable OSHA legislation.

Each standard must reflect the specific operation conducted at that particular work site. For all applicable standards being utilized, workers shall be familiar with and follow the requirements.

3.4.6 Compressed Gases

The Contractor shall ensure that:

- Compressed gas cylinders are stored and used in accordance with regulatory requirements
- Compressed gas cylinders shall not be transported in elevators with any other worker present other than the worker moving the cylinders. (Exception: Self Contained Breathing Apparatus (SCBA) and small containers of aerosols for non-destructive testing).

3.4.7 Confined Space

Contractors who have workers entering and/or working within restricted and/or confined spaces must have a Confined Space Standard, including an assessment and control program in order to manage all risks associated with working in restricted and confined spaces. Only competent workers shall enter and/or work within a restricted and confined space.

3.4.8 Crystalline Silica

Construction work activities involving concrete, brick, asphalt, plaster etc. and disturbance through sanding, drilling, chipping, grinding, coring, cutting, sawing, dry sweeping, tunneling and abrasive blasting have the potential to expose workers to airborne concentrations of respirable crystalline silica. The contractor shall ensure that exposure to crystalline silica is kept as low as reasonably achievable (ALARA) and below applicable Occupational Exposure Limits (OEL). If the Contractor is unsure of the levels of exposure, hygiene monitoring for crystalline silica must be conducted to determine appropriate PPE. Job-specific procedures and a code of practice are required to meet or exceed OSHA legislation and any EUSA specific requirements. Respiratory protection with appropriate cartridges is required when

silica levels exceed 50% of the OEL. If not practicable to perform hygiene monitoring, respiratory protection shall be worn.

3.4.9 Equipment Use, Maintenance and Repair

The Contractor shall ensure that all equipment used on the work site is maintained and is in good operating condition, safely secured and used in accordance with the manufacturer's specifications. Workers should be Competent in the use of equipment. Equipment shall not be modified without the manufacturer's written approval, and all equipment shall be inspected prior to use. Custom-made equipment/tools must receive engineer certification prior to use on EUSA work sites. The Contractor shall provide proof of certification, as requested by EUSA.

3.4.10 Extreme Hot or Cold Weather Work

The Contractor shall have a procedure in place to effectively manage workers who are exposed to temperature extremes. The procedure shall identify when the procedure is to be implemented and shall identify specific controls and actions to be taken, including work/rest periods, and when work will cease. The procedure shall be based on a recognized protocol such as the American Council of Government and Industrial Hygienists (ACGIH) Biological Exposure Indices.

3.4.11 Ground Disturbance (Including trenching and excavations)

The Contractor shall have a procedure in place

The Contractor shall ensure that ground disturbance is conducted in accordance with the applicable legislation and takes into account the appropriate method of locating and exposing underground utilities, soil conditions, worker access/egress, spoil pile location, and safeguarding. The Contractor shall ensure protection of workers and existing infrastructure from sloughing by cutting back, benching or sloping the walls and/or by installing temporary protective structures in trenches and excavations in accordance with applicable legislation. The Contractor may be required to obtain an EUSA permit for any ground disturbance activities.

3.4.12 Hand and Power Tools

The Contractor shall ensure that power and hand tools are inspected, used and maintained in accordance with the manufacturer's specifications and that guards and handles are not removed or modified. Tools shall be operated only by competent workers who are knowledgeable in the safe use, limitations and maintenance of that tool. Power tools that incorporate a trigger lock shall not be used on any EUSA work sites. Power tools used in areas with excessive moisture shall be protected with a GFCI.

3.4.13 Hoisting and Rigging

The Contractor shall ensure that all aspects of hoisting and rigging comply with the applicable legislation in the jurisdiction in which the work is being performed and that all hoisting and rigging equipment is used in accordance with manufacturer's specifications.

Only competent workers, designated by the Contractor, shall operate hoists, act as signalers, or perform rigging functions. The operator of the lifting device shall have access to sufficient load charts and be made aware of the load weight in order to perform the lift safely. Log books for cranes and hoists shall be maintained as required. Approved rigging shall be of sufficient strength, inspected prior to each use, and be used in a safe manner for which it was designed. Tag lines shall be used, where required, to control the load and to prevent undesired movement, unless the use of tag lines create a greater hazard. At no time shall loads travel or be suspended over workers. At no time shall workers work under a suspended load. Lift plans shall be developed, as applicable, and made available to EUSA upon request.

3.4.14 Hot Work

Workers shall use work practices that prevent the unintentional ignition of combustible gases, dusts, or flammable materials. Workers shall be equipped with and/or wear PPE that will prevent burn injuries. Fire blankets and barriers shall be used to protect other workers and control fire hazards. Hot Work permits, fire watch, and quality assurance procedures may be required at some work sites. Ensure appropriate ventilation when performing hot work. This may include installing a temporary ventilation unit.

Hot work permits are only valid for the work shift and location for which it was issued. A new permit must be obtained if the work scope or tasks change or new hazards are introduced. The hot work permit must be kept on the work site while the work is underway.

Air monitoring shall be completed before and during hot work activities, as required.

3.4.15 Housekeeping

The Contractor shall ensure:

- The work site is kept clean and free from accumulation of debris and other hazards that may endanger workers, visitors, or the public
- The work site shall have unrestricted safe access and egress
- Proper storage of equipment, tools, and materials
- The work site is orderly at all times and that slip and trip hazards are controlled
- Respiratory Protection

3.4.16 Hydrogen Sulfide (H₂S)

The Contractor shall ensure that workers who may be exposed to H₂S have received applicable training. Personal gas monitors are required for workers who will enter an area where H₂S is or could be present. Gas monitoring is required prior to entry and continuously for the duration of the work. Workers must evacuate the area immediately if their gas monitor alarms. Task-specific procedures are required to meet or exceed applicable OSHA legislation and any EPCOR specific requirements in the jurisdiction in which the work is being performed. Every reasonable effort shall be taken to mitigate the H₂S exposure potential

before relying on PPE for worker protection. In situations where H₂S (or the potential for H₂S) cannot be eliminated, respiratory protection shall be used.

Respiratory protection is required when entering areas where:

- There is any potential for H₂S release
- System or personal gas monitor alarms indicate the presence of H₂S
- There is a possibility of H₂S (i.e., Confined Spaces)
- Any work activity has the potential to release H₂S

Respiratory protection for H₂S exposures or anticipated exposures greater than 10ppm is limited to Self-Contained Breathing Apparatus (SCBA) or supplied-air respirator. Contractor shall ensure that exposure to H₂S is kept as low as reasonably achievable (ALARA) and below applicable Occupational Exposure Limits (OEL).

Where applicable, the Contractor shall use non-sparking ventilation systems, approved explosion-proof equipment and intrinsically-safe electrical systems in areas where H₂S is or could be present.

3.4.17 Ladders

All portable ladders shall be in good condition and be used in accordance with the OSHA legislation of the jurisdiction in which the work is being performed. While working or positioned on a ladder, three-points of contact must be maintained by the worker. Ladders must be secured against movement unless held in position by a second worker. Workers shall not perform work from the top two rungs or steps of a ladder. Extension ladders shall extend a minimum of three rungs (three feet) beyond the platform, deck, roof line, ground, etc. Ladders for use near electrical equipment must be non-conductive. All work from ladders is limited to short duration tasks.

3.4.18 Lead Paint

Lead paint may be found in EUSA facilities and can be found on various equipment, piping and other infrastructure applications. If a concern arises about the content of the paint or coating, a test to determine lead content must be performed. Where lead-containing paint is being removed from existing equipment, piping, etc., the Contractor shall ensure that any dust is properly controlled. Respiratory protection with appropriate cartridges is required when lead levels exceed 50% of the OEL. Contractors should conduct air monitoring for lead dust to confirm that the controls in place are effective.

3.4.19 Lighting

The Contractor shall ensure sufficient lighting at the work site for the tasks being performed.

3.4.20 Manhole and Vault Covers

When the work requires the removal of a manhole or vault lid, the Contractor shall ensure that a suitable guard rail is installed before the lid/cover is removed and that air monitoring is completed prior to removal, if a potential atmospheric hazard exists. The manhole or vault shall not be left unattended while open. The manhole or vault shall be adequately protected and covered if it must be left unattended.

3.4.21 Material Handling

The Contractor shall ensure that loads and materials are secured to prevent unintentional movement or spillage. Regulated chemicals shall be transported in accordance with the applicable legislation in the jurisdiction in which the work is being performed.

3.4.22 Mobile Equipment

Contractors shall ensure workers are aware of the hazards associated with working around mobile equipment. Mobile equipment shall be inspected prior to use with records retained (i.e., equipment logbooks) at the work site. Workers working in the vicinity of mobile equipment shall wear high-visibility clothing as approved by the American National Standards Institute (ANSI). Operators must be competent and certified to use mobile equipment. Contractors shall ensure that powered mobile equipment meets the requirements of applicable legislation in the jurisdiction in which the work is being performed.

Equipment fitted with roll-over protective structures shall be equipped with seat belts and the seat belts shall be worn when the equipment is in operation. Back-up alarms shall be maintained in good working order. A spotter, if available must be utilized when backing or when moving in congested work areas.

3.4.23 Noise

Where workers are exposed to “excessive noise” (noise exceeding the OEL), the Contractor must develop and implement a Noise Management Program, consisting of the following elements:

- Educating workers, including how noise induced hearing loss occurs and how workers can be protected
- Audiometric testing
- Measuring and monitoring sound levels, including:
 - The actions taken to protect workers dependent on the level and type of noise at the work site
 - The identification of noise sources and the workers most likely to be exposed above the OEL
- Posting of signage where the noise level exceeds 85 dBA

- Controlling noise exposure through:
 - Engineering controls
 - Administrative controls
 - By providing workers with appropriate personal hearing protection

3.4.24 Openings in Decks, Floors, Platforms, etc.

Openings that create a fall hazard must have a temporary cover with warning signs, or temporary guard rails (or other suitable control) with signage installed by the Contractor before the opening is created.

3.4.25 Permits

The Contractor shall obtain permits through EUSA first and then, if non exists, the Contractor shall provide their own permitting system for the following:

- Control of Hazardous Energy (COHE, Lockout/Tagout, grounding, etc.)
- Confined Space entry
- Hot Work
- Directional Drilling
- Ground disturbance
- Daily Work Permit

The Contractor shall ensure that their permitting process complies with all legislated requirements and meets the standards established by EUSA. Personnel involved in the permitting system shall be trained in the permitting process. During the course of the work, if conditions or procedures vary from the permit, the Contractor shall stop work, assess the new conditions and review/modify the permit as required.

3.4.26 Personal Protective Equipment (PPE)

Contractors shall ensure that workers comply with EUSA minimum requirements for PPE on EUSA work sites. They must also ensure workers are trained in the use, care, and limitations of PPE, in order to control or minimize hazard exposure. Task and hazard specific PPE shall be used as determined by the hazard assessment and legislated requirements. Minimum PPE requirements for high consequence work include:

- Hardhat (side impact if hazard exists). Must meet requirements of ANSI Standard Z89.1-2003, American National Standard for Industrial Head Protection
- Eye protection with side shield. Must meet requirements of ANSI Standard Z87.1-2003, Occupational and Educational Personal Eye and Face Protection Devices

- Safety boots with a nominal height of 6 inches at ankle bearing. Must be approved to ASTM Standard F2413-05, Specification for Performance Requirements for Protective Footwear
- High visibility reflective outer garment. Arc Rated (minimum 8 cal/cm²) when working within 10 feet of exposed energized electrical equipment, cables, or overhead power lines.

NOTE: When work requires personal fall protection equipment, a fire-resistant harness and lanyard must be worn when working within 10 feet of exposed energized electrical equipment, cables, or overhead lines.

3.4.27 Public Safety

Contractors shall ensure that access to the work site is controlled to ensure that the public and any individuals not affiliated with the work are not exposed to hazards present at the work site. This may involve the use of fencing, barricading, guard rails, barrier tape, lighting, signage, hoarding, locked covers over openings, security personnel, signage, and/or other means of safeguarding, as appropriate.

3.4.28 Scaffolds

The Contractor shall ensure that scaffold assembly and disassembly is compliant with the applicable legislation and standards in the jurisdiction in which the work is being performed, and according to manufacturer's specifications. All scaffolding shall be properly inspected and tagged for use in accordance with legislative requirements. Scaffold assembly and disassembly must be performed by a competent worker.

3.4.29 Shared Facilities

Unless the Contractor has specific permission to use shared facilities such as lunch rooms, meeting spaces, sanitary facilities, storage, lay-down areas, etc., as provided by EUSA, the Contractor shall provide appropriate facilities in accordance with applicable legislation. The location of such facilities shall be approved by the EUSA Owner Representative in advance. Contractor-supplied facilities shall be regularly cleaned and maintained.

3.4.30 Signs, Warnings, Barricades & Barrier Tape

The Contractor shall use warning signs, barricades, cones, flashers, flagging, and/or delineators when working on or near roads or other areas where hazards exist. These types of controls shall be used to communicate potential hazards or unsafe conditions. These controls must be removed when the hazard no longer exists or when the work has been completed.

3.4.31 Site Security

The Contractor shall comply with EUSA's Physical Security Standards, including but not limited to requirements related to access control, locks and keys, and the protection of EUSA facilities and assets. These requirements include, but are not limited to, the following:

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PRINTED COPIES OF THIS DOCUMENT ARE VALID FOR 24 HOURS.

- **Background Screening for Unescorted Access**

Contractors requesting unescorted access to EUSA facilities or restricted areas must complete a background screening and receive approval from EUSA prior to entry.

- Background screenings may be completed through EUSA's designated vendor or through a Professional Background Screening Association (PBSA) accredited agency
- If a PBSA agency is used, the Contractor must provide the completed report directly to EUSA's Security representative for review
- Unescorted access and any associated ID/Access Cards will not be issued until EUSA has reviewed and approved the screening results
- Background screenings must include, at minimum, a criminal records check dated no more than 90 days prior to the Contractor's start of work

- **Visitor Controls and Key Management**

- Any individual without approved unescorted access must sign in as a visitor and remain under escort by authorized EUSA personnel or an approved Contractor at all times
- Contractors must comply with all key management procedures, including signing out mechanical keys for EUSA assets and returning them at the end of each workday
- Lost or unreturned keys must be reported immediately to EUSA's security representative

- **Reporting Security Related Incidents**

Contractors shall promptly report any criminal, suspicious, or security related incidents to EUSA's Project Representative or EUSA's Security personnel for investigation

3.4.32 Additional Site Specific Security Requirements

Depending on the size, scope, and location of the work, EUSA's Project Representative may require the Contractor to implement additional security measures. These may include:

- Providing on-site security personnel (e.g., uniformed guards)
- Managing visitor access or maintaining a visitor log
- Implementing supplemental site specific security procedures

Any such security requirements will be coordinated through EUSA's Project Representative and Security department. If the work site already operates with established guard services, all unescorted access and visitor sign-in processes must follow the established procedures at that location.

3.4.33 Styrene

Styrene is a clear, colorless liquid that is commonly used in the production of many everyday products such as plastic packaging, counter tops, disposable cups and containers, insulation and in EUSA operations it can be produced during sewer relining projects.

The Contractor shall ensure compliance with OSHA PELs as listed in 29 CFR 1910.1000. Where company policy requires or where OSHA PELs are outdated, ACGIH TLVs or NIOSH RELs may be used as internal guidelines. If the Contractor is unsure of the levels of exposure, monitoring for styrene must be conducted to determine appropriate personal protective equipment (PPE). Job specific procedures are required to meet or exceed OSHA legislation and any EUSA specific requirements. Respiratory protection with appropriate cartridges is required when styrene levels exceed 50% of the OEL. If not practicable to perform monitoring, respiratory protection shall be worn. Monitoring may be required for home owners when complains have been made. The monitoring for styrene must use instrumentation that has been properly calibrated for styrene as per the manufactures specifications.

3.4.34 Temporary Heating and Ventilation

The Contractor shall ensure that competent workers install temporary heating and/or ventilation systems and sufficient make up air is provided at all times. The fuel supply and heaters shall be secured to prevent falling over, protected from being struck, and placed with sufficient air movement around the fuel supply and exhaust. Temporary heating and ventilation plans are to be submitted to the EUSA Owner Representative for review, upon request. Temporary ventilation intended to control levels of airborne contaminants or to ensure adequate levels of respirable air shall be maintained.

3.4.35 Traffic Hazards

The Contractor shall ensure that appropriate controls are implemented to protect workers from the hazards created by vehicular traffic or mobile equipment, including appropriate barricades and the use of high-visibility clothing or vests Minimum ANSI/ISEA 107-2020 Class 2 high-visibility apparel, or higher as required by the applicable state or federal highway traffic control standard for the work zone where required. Applicable permit and/or traffic accommodation plans must be in compliance with all local laws and requirements.

3.4.36 Underground and Overhead Utilities

The Contractor shall ensure compliance with the requirements outlined in, but not limited to: Pipeline Acts, Regulations and Codes; Electrical Utility Acts, Regulations and Codes; OSHA Regulations and Code; and other applicable legislation in the jurisdiction in which the work is being performed.

The Contractor shall ensure that workers are made aware of the location of overhead and/or underground utilities and of the hazards associated with contacting these utilities. The

Contractor shall ensure that the safe limits of approach and safe ground disturbance practices, as outlined in legislation for workers and equipment, are maintained and followed at all times. The Contractor shall notify and consult with the local utility owner(s) of overhead and underground utilities prior to encroaching on the applicable limits of approach.

When it is necessary to operate equipment under an overhead utility, the Contractor shall ensure that the equipment is operated in a configuration which will prevent contact with the overhead utility. The equipment shall only be operated under the direction of a spotter. Signs warning of the danger of overhead utilities shall be placed below the utility when travel under the utility is required.

3.4.37 Working Alone

When applicable, the Contractor shall develop a Working Alone plan that is reviewed by EUSA. Appropriate measures, based on the Job Hazard Assessment, shall be developed and utilized to monitor and ensure the health and safety of the workers in accordance with applicable legislation.

3.5 INSPECTION AND MAINTENANCE

The Contractor shall establish a program of HSE inspections which shall include the schedule frequency and the responsibilities of Contractor personnel. All findings shall be documented in a report detailing the proposed corrective action to be taken, including time lines and responsibilities for completion. EUSA Owner Representative must be immediately notified of any inspections or orders by regulatory agencies, including any action plan to address the identified deficiencies.

Contractors must conduct Work Observations to evaluate the safety and environmental aspects of the tasks performed at the work site. The purpose of these behavioral observations are to ensure that workers understand and apply safe work processes and procedures, as well as to establish a two-way communication between workers to discuss safety and environmental related issues.

Scheduled work observations and inspections shall be conducted at a frequency determined by the scope of work, including the hazards associated to the work and the work site. If work is forecasted to be >5 business days in continuous duration, at a minimum, weekly formal inspections are required. Completion of observations and inspections shall be available to EUSA.

3.6 EMERGENCY PREPAREDNESS AND RESPONSE

3.6.1 Emergency Response Planning

Based on the Pre-Job Hazard Assessment performed by the Contractor, an overall Emergency Response Plan (ERP) shall be established (emergency response procedures, routes, equipment, emergency contacts, etc.) to manage potential emergency scenarios. Contractors shall review the contents of the plan with all workers on the work site. If the work site has an existing ERP, the Contractor shall coordinate the ERP with the existing facility plan and shall familiarize all the workers under their control of the contents of the plan.

Contractor must be prepared to perform a drill of their ERP to EUSA (i.e., Confined Space

rescue, trench rescue, fall rescue, substance release, etc.).

3.6.2 Fire Protection

The Contractor shall ensure that an adequate number of fire extinguishers, of the appropriate type and size, are provided and maintained in accordance with applicable legislation in the jurisdiction in which the work is being performed. The fire extinguishers shall be clearly visible, properly stored/mounted, and readily accessible. Workers shall be trained in the use of the fire extinguishers provided. The extinguishers shall be inspected monthly and certified annually. They must be tagged out of service if defective, and replace if missing/deployed.

3.6.3 First Aid

Contractors shall provide first aid services, equipment, supplies, and transportation in accordance with the current OSHA legislation, taking into consideration the work being performed, the number of workers present and response time for emergency response personnel or work site proximity to a health care facility. Throughout the duration of the work, the Contractor shall ensure that the required number of competent emergency first aid and standard first aid personnel are present at the work site while work is being conducted. The Contractor shall ensure appropriate first aid supplies and providers are readily available at or near the work area.

3.6.4 Severe Weather

The Contractor shall develop severe weather guidelines that include procedures and Work shut down guidelines applicable to the geography (i.e. extreme cold or heat, poor air quality).

3.6.5 Spill Control and Clean Up

Contractors shall utilize secondary containment around chemical or fuel storage containers. Absorbent material capable of containing and managing small spills shall be available and accessible at all times. Slurry/sediment control must be in place around catch basins, manholes, drains, etc. and Contractors must have site-specific frac-out management plans documented and available at all times when conducting work that has potential for an inadvertent fluid release resulting from drilling operations (e.g., horizontal directional drilling). Spills and other substance releases, including frac-outs and sediment releases into catch basins or other environmentally sensitive features, shall be reported as per EUSA Incident Reporting timeline to the Owner Representative with a follow-up Incident report.

3.7 INCIDENT MANAGEMENT

The Contractor shall maintain an Incident Management System that complies with EUSA standards, procedures and the applicable legislation in the jurisdiction in which the work is being performed. Incident investigations establish the relevant facts of the Incident and assist in the identification of Health and Safety Management System failures and root cause(s) which form the basis for the development of appropriate and specific corrective and preventative actions. Corrective/preventative actions shall address each root cause of the

Incident.

3.7.1 Incident Notification to Regulatory Bodies

OSHA and Environmental Regulatory notification shall be completed in accordance with applicable federal, provincial, state, or municipal reporting guidelines. General Contractors are required to notify the applicable agency.

3.7.2 Incident Reporting and Investigations

EUSA must be notified within 30 minutes (or at first opportunity when safe to do so) from the time of an Incident by voice, email, or alternative means determined appropriate during premobilization with EUSA. This includes all Incidents: occupational injury/illness (including first aid Incident), fatality, property damage, vehicle or equipment damage, utility strike, environmental Incidents (including spills) and near misses. The Contractor is responsible for complying with EUSA's Alcohol and Drug post-incident testing and investigation protocols. Contractors shall lead Incident investigations and participate in post-Incident discovery and post-Incident debrief meetings, as applicable. Contractors shall submit the preliminary Incident report to EUSA within 24-hours and the final report (including causal analysis and corrective/preventive actions) within 7 days.

- Post Incident Notification Checklist

3.7.3 Workers' Compensation Coverage

The Contractor and all Subcontractors shall have an account in good standing with the appropriate Workers' Compensation agency before they begin work on the project. The account shall be maintained during the length of the project. Proof of current account status shall be provided to EPCOR USA upon request. Industries exempt from the Workers' Compensation legislation in the jurisdiction in which the work is being performed shall provide proof of insurance coverage acceptable to EUSA.

3.7.4 Non-Conformance, Corrective and Preventative Action

While working on EUSA work sites, the Contractor shall have an ongoing process to identify items of non-conformance and to take corrective/preventative action to address the root causes. Where a risk assessment has determined new or changed hazards, environmental impacts or control requirements, preventative or corrective actions shall be developed, communicated and implemented. The EUSA Owner Representative shall be provided with a record of the actions taken.

3.8 SYSTEM ADMINISTRATION

3.8.1 Compliance Audits

Contractors shall participate in EUSA led periodic audits that may include documentation review, interviews, and work site observations. Audit findings will be shared with the Contractor. Action plans as a result of these audits shall be developed by the Contractor in

accordance with EPCOR methodology, to address the findings with immediate and long-term corrective actions identified, responsibilities assigned and completion dates determined. Contractors will be required to provide periodic progress updates.

Contractors shall perform formal compliance audits of the implementation and management of their health and safety management system at least every 12 months to evaluate safety related performance. Subcontractors shall be included in such audits.

Copies of action plans shall be made available to the Owner Representative upon request.

3.8.2 Meetings

The Contractor shall ensure HSE Meetings are held with adequate management and worker representation in attendance, and must include Subcontractors, as applicable. These meetings are to be focused on HSE concerns related to the work or the work site.

3.8.3 Tailgate Meetings

Daily meetings must address the specific tasks for that day, permits required, and other pertinent work scope information. All applicable workers and Subcontractors must participate in daily meetings.

3.8.4 HSE Records and Records Management

The Contractor must maintain HSE related records, for the duration of the project, as they relate to and support the health and safety management system. These records shall be made available to the Owner Representative upon request.

3.8.5 Monthly HSE Performance Report

The Contractor shall maintain and report to EUSA project related HSE performance while performing work on EUSA work sites. This includes work performed by all Subcontractors. These reports are to be submitted online by the fifth business day of the following month.

3.8.6 Continuous Improvement Cycle

The Contractor shall regularly review audits, evaluations, regulatory requirements, HSE performance, changing circumstances, incident investigations, and corrective and preventative actions to ensure the continuing suitability, adequacy and effectiveness of HSE management on the contract.

3.9 ADDITIONAL REQUIREMENTS

3.9.1 Contractor Registry

Contractors performing High Consequence Work shall register and maintain compliance with EUSA's Contractor Registry. The Contractor shall inform their EUSA Owner Representative if their status changes, or if the company has an event that results in a fatality, an OSHA Stop Work Order and/or fine, and/or an environmental fine and/or order. Contractors who do not

maintain a compliant status in the registry may be required to submit additional documentation and/or to obtain additional authorization (i.e., a daily Work permit) in order to perform work for EUSA.

3.9.2 Contractor HSE Management System/Program

The Contractor shall have their corporate HSE program, the applicable HSE legislation, other applicable regulations, and their Site Specific Safety Plan on the work site and available for review.

3.9.3 Contract Specific Requirements

Additional EUSA requirements such as: specific site requirements, safety plans, procedures and/or work practices, permits, etc. will be identified in the contract documents and/or during premobilization activities.

- EPCOR Contractor Premobilization HSE Requirements Checklist

3.9.4 Pandemic Preparedness and Response Plan(s)

The Contractor shall have a response plan within their HSE program that ensures the health and safety of all workers who may be impacted by a health pandemic.

3.9.5 Associated Standards and Procedures

The list below is a summary of, but not inclusive of all EUSA related Standards & Procedures:

- Asbestos Management Standard
- Confined Space Standard
- Crane, Hoisting and Rigging Standard
- Fall Protection Standard
- Fit Testing Procedure
- Ground Disturbance Standard
- Hazardous Energy Standard
- Hazardous Product Management Standard
- Hearing Conservation Program Standard
- Respiratory Protection Standard
- Selection Use and Maintenance of Respiratory Equipment Procedure
- Silica Management Standard

Note: It is the responsibility of the Contractor to request a copy of each Standard and Procedure as it applies to the scope of work performed for EPCOR USA.

4.0 ROLES AND RESPONSIBILITIES

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5.0 EXCEPTIONS

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6.0 DEFINITIONS

Competent Worker – A person who is adequately qualified, suitably trained and with sufficient experience to safely perform Work with a minimal degree of supervision.

Confined Space – A Confined Space means a restricted space which may become hazardous to a Worker entering it because of an unsafe atmosphere, condition, or work activity that will or could cause the space to become unsuitable and unsafe for human occupancy.

Contract(s) – Any written document that legally binds EUSA, including but not limited to agreements, amending agreements, change orders, letter agreements, letters of intent and/or memorandums of understanding, purchase orders, executed or to be executed by one of more Employees on behalf of EUSA evidencing that EPCOR Utilities Inc., or a specific Legal Entity, and one or more third parties have exchanged legally binding rights, duties, obligations or promises for consideration.

Contractor – A company, person, partnership, trust or group of persons who through a Contractor, an agreement or ownership, directs the activities of workers at a work site.

Environmental Aspect – Element of an organization's activities, products or services which can interact with the environment. For example, it could involve a discharge, an emission, consumption or reuse of a material, or noise. See 'environmental impact' for complementary information.

Environmental Impacts – Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services.

EPCOR USA – EPCOR USA and all of its subsidiaries and affiliates.

EPCOR USA Work Site – A site or location owned, leased, operated or otherwise controlled (i.e., through franchise agreements) by EUSA where all or any of the work is to be performed, which the site may have on it, other projects or existing facilities, activities, or operations.

Hazard – A situation, condition or thing that may be dangerous to the health or safety of workers, the public or environment.

High Consequence Work – Work involving any of the following conditions/activities:

- Use of mobile equipment (non-licensed vehicles)
- Hazards where an occupational exposure control plan is required
- Confined space entry
- Working at heights where a fall protection plan is required
- Demolition
- Control of Hazardous Energy
- Electrical Work
- Hot work
- Work on, over, or in open water
- Rigging or hoisting with a lifting device over 2-ton capacity
- Ground disturbance
- Working in an excavation
- Working on or directly adjacent to a public roadway where traffic control is required
- Working in a substation or switch yard
- Rescue services
- Supervising and/or directing high consequence work
- In consultation between Owner Representative and BU Health and Safety, work is deemed to be high consequence

HSE Meeting – Formal meeting held by Supervisors with their workers (including Subcontractors) to communicate HSE requirements and to address concerns.

Incident – An unplanned, undesired event, which results in an injury, loss, damage, system failure or environmental impact.

Job Hazard Assessment – An evaluation that is completed prior to work commencing at a Work site. The objective of the assessment is to identify hazards, assess risks and control exposure before the task for the day begin.

Low Consequence – In consultation between EUSA Owner Representative and EUSA HSE, work is deemed Low Consequence. Includes work that is not High Consequence.

Owner Representative – The person (i.e., EUSA employee) designated by EUSA, as the Owner Representative (i.e., Contract administrator), appointed by the Owner to oversee the work, or a designated part of it. The Owner Representative is primarily responsible for ensuring the completion and management of a defined scope of work by a Contractor.

Pre-Job Hazard Assessment – During the hazard assessment process, prior to mobilization, tasks that present risk will be identified. These tasks will require risk assessment (for inherent and residual risk) and controls.

Prime Contractor/Contract in Charge – Contractor, employer or other person who enters into an agreement is established, the Owner of the work site is the Contractor/Constructor.

Safety Stand Down (or “reset”) – A forum for a Contractor to present, to the EUSA Owner Representative and EUSA leadership, the causal analysis, corrective actions, and lessons learned from any events of high severity (or potential severity) within the previous 12-month period. The request for a Safety Stand Down will be initiated by the Contractor, EUSA Owner Representative, and/or EUSA HSE.

Scope of Work (Scope) – Documentation provided by the Owner Representative to effectively state the Work a Contractor is to perform, and the known hazards associated with the work environment.

Services – Labor, duties, functions and activities required to be performed by the Contractor under a contract.

Site Specific Safety Plan – A document that is developed by the Contractor prior to mobilization to site that outlines how health, safety and environment will be managed during the work, which includes, but is not limited to, the work activities, schedule, quality management, HSE hazard analysis and control.

Toolbox Talk Meeting – A meeting conducted at the work site by the workers to discuss a Job Hazard Analysis for the job step/task to be performed to ensure that all associated hazards have been identified and controls established.

Work – The provision of Good and/or Services by a Contractor to EUSA.

Worker – Any person involved in an occupation.

Work Site – A location where a worker is, or is likely to be, engaged in any occupation and includes any vehicle or mobile equipment used by a worker in an occupation.

7.0 TRAINING

Competent Workers - The Contractor shall utilize competent workers to perform work. workers who do not meet this criteria shall be directly supervised by a competent worker, or will not perform the tasks for which the training has not been completed.

Orientation – All workers on EUSA scopes of work must complete the online Contractor Safety Orientation and any applicable work site specific orientation prior to commencing work (with respect to the project). All EUSA orientations expire one year from the date completed and must be recertified prior to expiration. The link and instructions for the online orientation can be found in the Contractor Registry ISNetwork, or can be provided by the EUSA Owner Representative.

Training – At a minimum, all workers must meet all applicable OSHA and other legislative training requirements, or equivalent, before commencing work. The Contractor shall ensure that workers have the applicable training, which might include, but not limited to the following:

- Aerial Work platforms (also referred to as Mobile Aerial Work Platforms – MEWPs)
- Confined Space entry and monitor
- Control of Hazardous Energy / Lockout-Tagout
- Fall Protection
- Fire extinguisher use
- First aid/CPR/AED, in accordance to requirements of the applicable legislation
- Flagging
- Ground Disturbance (i.e., safe trenching and excavation)
- H2S Awareness
- Hazard Communication (HAZCOM) / Globally Harmonized System (GHS)
- Hearing Conservation
- Hoisting and Rigging
- Hot Work
- Load securement
- Powered mobile equipment operation (crane, forklift, skid steer, etc.)
- Rescue (i.e., fall rescue, Confined Space rescue, trench rescue)
- Respiratory protection
- Safe Limits of Approach
- Scaffolding (understand the significant of tags)
- Spill response
- Traffic accommodation (i.e., barricading)
- Traffic control

The Contractor shall maintain training records for all employees and produce the certificates upon request of EUSA.

8.0 ATTACHMENTS

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9.0 RELATED DOCUMENTS

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10.0 REFERENCES

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New Mexico – [Dee Johnson Clean Air Act](#)

[The Smoke Free Arizona Act](#)

11.0 RECORDS

This section intentionally left blank.