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**Environmental, Health and Safety  
Supplemental Requirements  
Project Management & Construction (PMC)**

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**PURPOSE**

The purpose of the Environmental, Health and Safety (EHS) Supplemental Requirement document is to define business unit EHS requirements not included in the Duke Energy EHS Handbook. Contractors are to comply with all Federal, State and Local EHS regulations, the Duke Energy EHS Handbook, these business unit EHS Supplemental Requirement and Contractor-owned programs or procedures.

Certain sections or specific requirements in this document or the Duke Energy EHS Handbook may not apply depending on the Contractors' scope of work.

**KEYS TO LIFE**

Duke Energy's Health and Safety vision is to have an injury- and illness-free workplace.

Keys to Life support the vision by identifying hazards of high-risk activities known to cause fatalities and serious injuries. They outline standards and define expectations, behaviors and controls necessary to prevent serious events.

Keys to Life do not replace existing safety procedures, policies or manuals. It is one tool of the company's fatality and serious injury prevention program.

Duke Energy expects Contractors to assess their work scope safety risks to ensure they have effective controls in place and to follow behaviors and standards defined by Keys to Life.

- **Driving safely** - Wear seat belts, follow posted speed limits and comply with regulations. Avoid distractions that would remove your focus from the road.
- **Fall from elevation** - Use fall protection equipment when required for work at heights greater than 6 feet. Inspect equipment before use and use it properly. Maintain three points of contact when changing elevation.
- **Hazardous energy (lockout/tagout)** - All sources of hazardous energy shall be properly identified, isolated and verified to have zero energy and tagged/locked prior to starting work. Do not manipulate isolated equipment or work on equipment without authorization.
- **Cranes and rigging operations** - Cranes and rigging shall be inspected prior to use. Critical lifts shall be strictly controlled and accompanied by a critical lift plan. Maintain positive control of all loads and avoid lifting over personnel.
- **Electrical safety** - Treat all electrical equipment or systems as energized unless verified to be de-energized. Wear proper personal protective equipment (PPE) and remove all metal jewelry prior to performing electrical work. Only qualified persons shall work near exposed energized equipment. Unqualified persons shall not open enclosures that contain exposed energized electrical parts or equipment. Maintain required distance from electrical equipment and conductors.
- **Trench and excavation** - Locate and protect underground installations prior to disturbing ground. Ensure excavations are protected from collapse through shoring, benching or sloping.
- **Dropped/falling objects** - Implement prevention measures where there is a potential for dropped objects. Measures shall include, at a minimum, proper barriers, exclusion zones and securing/tethering of tools and materials.
- **Work in areas with heavy equipment operation** - Use spotters when backing heavy equipment. Do not approach or enter the path of heavy equipment without making contact with operator and always wear high visibility clothing. Stay out of the swing radius and/or pinch point on rotating or articulating equipment. Do not operate heavy equipment and cranes near energized power lines.
- **Struck by or caught between** - Be aware of your surroundings and stay focused on the task at hand and work activities taking place around you. Avoid the line of fire.

**EVENT REPORTING AND INVESTIGATIONS**

1. It is imperative that the Duke Point of Contact (POC) remain abreast of all aspects of contractor performance. Contractors shall verbally notify the POC immediately after any event. The POC can assist with ensuring the appropriate event response action is taken. When in doubt, discuss with the POC.
2. Contractors shall formally report the following events within 24 hours of occurrence by submitting a written incident report to the POC or EHS professional.
  - a. Occupational Safety and Health Administration (OSHA) recordable injuries
  - b. Environmental Events - Reportable Environmental Event (REE) -1, REE-2 and Category 3 environmental event when a notification is made to an external agency.
  - c. Duke Energy management may request an IIR be submitted for other environmental events to allow EH&S evaluation on classification and reporting requirements.
3. Contractors shall formally report the following events within 2 hours of occurrence by submitting a written incident report to the POC or EHS professional.
  - Fatality,
  - Life-Altering injury (LAI).
  - Serious Injury (SIF)
4. REE-1's, REE-2's, Fatalities, Life Altering Injuries, Serious Injuries (SIF's) and Significant Customer Outage events will require a causal analysis. The causal analysis investigation will be in accordance with the contractor's procedures but must meet the defined elements of the Duke Energy Corrective Action Program (CAP) (See ADMP-ADM-OPX-00065, Corrective Action Program or the respective Business Unit CAP program).
5. Contractors may be requested to conduct causal analysis investigations on other EHS events (e.g., significant near misses,) based on the discretion of business unit leadership

**CONTRACTOR EHS TRAINING**

1. A listing of "Competent Persons," as defined by respective OSHA standards, shall also be provided to Duke Energy upon request, in accordance with regulatory requirements.
2. An orientation of Contractor and Subcontractor employees that covers all project and regulatory EHS requirements, shall occur before employees begin work. Short-term technical support or troubleshooting personnel or visitors may be escorted by contractor personnel in lieu of receiving a full orientation. Orientations are expected to align with Site-Specific EHS Plans, and all incorporated Duke Energy requirements.

**CONTRACTOR COMPANY PRE-QUALIFICATION PROCESS**

1. Avetta: A 3rd party web-based application designed to pre-approve safety data and documents provided by contractor companies. The pre-approval process consists of Safety Evaluations/Ratings and Manual Audits. Avetta reviews and verifies the data and documents submitted by contractors to Duke Energy's Avetta account.
2. Avetta conducts the safety evaluation/rating, using the Duke Energy safety targets, and issues a Pass or Fail overall safety rating. (See Targets in # 6 below)
  - a. Contractor shall review all subcontractor environmental, health and safety programs for compliance with environmental, health, and safety requirements, State requirements, Federal requirements, Duke Energy EHS Handbook requirements, and the requirements of this document.
  - b. Manual Audit is the verification by Avetta that contract companies have OSHA compliant written H&S programs. Audits occur every 3 years.
  - c. QuickVett is a module that allows contractors who do not currently participate in Avetta to provide a limited amount of information/safety data to determine if the contractor will meet Duke Energy's safety performance targets should work be awarded. This process does not allow a safety rating to be issued.
3. All targets are 3-year averages except for fatalities, Contractor shall use the following minimum requirements to pre-qualify and provide documentation as requested:
  1. Companies with fewer than 100 employees.
    - a. One or fewer workplace fatalities within the previous three (3) years. If one (1) fatality, no confirmed Serious OSHA citation relating to the fatality.
    - b. Experience Modification Rating (EMR) = 1.0 or less.
    - c. Environmental Notice of Violation (NOV) (federal or state) with penalties greater than \$1000 = one (1) or less confirmed
    - d. OSHA citations = one (1) or less serious with 0 willful.
    - e. Total Recordable Injuries = three (3) or less.

**Contractors must pass the fatality target (a) and three of the remaining four targets (b-e).**

2. Companies with 100 or more employees
  - a. One or fewer workplace fatalities within the previous three (3) years. If one (1) fatality, no confirmed Serious OSHA citation relating to the fatality.
  - b. Experience Modification Rating (EMR) = 1.0 or less.
  - c. Environmental Notice of Violation (NOV) (federal or state) with penalties greater than \$1000 = two (2) or less confirmed
  - d. OSHA citations = two (2) or less serious with 0 willful.
  - e. Total Incident Case Rate (TICR) = 3.3 or less.
  - f. Days Away/Restricted Time (DART) = 1.9 or less.

**Contractors must pass the fatality target (a) and four of the remaining five targets (b-f).**

- TICR rates are calculated by the number of All recordable injuries X 200,000 divided by total hours worked.
- DART rates are calculated by the number of all Lost Workday and Restricted recordable injuries X 200,000 divided by total hours worked.

**SITE-SPECIFIC EHS PLAN**

1. Duke Energy will determine if a site-specific EH&S Plan is required based on task complexity, risks and work duration.
2. Contractor shall use this document, applicable EH&S-related standards and regulatory requirements, Duke Energy's Environmental, Health & Safety Handbook and the Contractor's own internal written EHS programs to develop a written site-specific EHS Plan that defines how potential hazards and risk will be identified and controlled throughout the course of performing work.
3. Contractor's site-specific EH&S Plan shall be submitted to Duke Energy 60 days before commencing work and shall be approved by Duke Energy before Contractor mobilization unless otherwise agreed to by Duke Energy.
4. With Duke Energy's approval, small Contractors with limited scope and low risk of work may utilize a Job Hazard Analysis (JHA) as the Site-Specific EHS Plan.
5. Higher risk and more complex work phases will require a site-specific EH&S plan. These activities, include but are not limited to:
  - a. Site Clearing/Grubbing
  - b. Site Cut/Fill/Grade Work
  - c. Underground Piping/Duct Bank Installation
  - d. Installing Temporary Power
  - e. Working at Heights ("Going Vertical")
  - f. Welding/Hot Work Activities
  - g. Confined Space Entry
  - h. Startup & Commissioning
  - i. Transition/Turnover to Customer

**JOB HAZARD ANALYSES (JHA)**

1. To ensure that the risks and hazards associated with high-risk work are consistently identified and associated controls are specified, Contractors and their subcontractors are free to use their own internal process and form, that is equivalent to a Job Hazard Analysis.
2. The JHA or equivalent process should identify the sequential task steps, the potential risk or hazards for each step and then specify how the risk/ hazards will be controlled.
3. JHAs can be reviewed as part of Pre-Job Briefings to ensure thoroughness and effectiveness of the Pre-Job Briefing.
4. The JHA should clearly align with the Site-Specific EHS Plan, in identifying hazards and how to control them.
5. Duke Energy may request to review Contractor and subcontractor JHAs or equivalent documents.
6. For more specific guidance on specific types of physical, health and environmental hazards, and typical construction activities that may be encountered, contractors can reference PMC's Job Hazard Analysis (JHA) Procedure (PMC-PRC-NA-SF-0010).

**EMERGENCY ACTION PLAN**

1. Contractor shall provide an Emergency Action Plan (EAP) and shall communicate this plan to all site personnel. The Contractor shall incorporate this plan into the site-specific EHS plan and submit for Duke Energy's review, comment, and acceptance. This plan shall include the following as a minimum:
  - a. Protocol for reporting emergencies including medical emergencies, fire emergencies, chemical spills / releases, rescue from heights (e.g., fall rescue plan), confined space rescues, bomb threats, severe weather (see environmental work exposure section below for other considerations), and additional measures to account for unique circumstances of Contractor's work and location.
  - b. Assembly points, evacuation routes, and accounting procedure for personnel (i.e., ensuring everyone is accounted for in an evacuation or emergency) shall be included in the plan.
  - c. Telephone numbers and locations of facilities including, but not limited to, hospitals, physicians, police, fire department, and emergency medical services.
2. Contractor is responsible for providing adequate safe zone facilities / shelter for their employees and subcontractors. Contractor shall work with the Duke Energy in identifying assembly points.
3. At operating Duke Energy generation facilities, all incidents requiring outside assistance (e.g., fire, ambulance, police) from the local 911 / Emergency Medical Services (EMS) shall be coordinated through the facility's Control Room unless otherwise agreed to by Duke Energy. The Control Room shall be immediately contacted, and 911 calls will be made / initiated by the person in the Control Room so the station's Emergency Notification System and Action Plan can be activated, and trained personnel can assist with coordinating outside agencies / services.

**ENVIRONMENTAL WORK EXPOSURE**

1. Contractor shall develop a plan for severe weather, including lightning, that addresses weather monitoring, notification to affected personnel, safe shelters for workers and suspension/resumption of work affected by such weather conditions. The Severe Weather Plan shall be submitted to the Duke Energy for review and acceptance.
  - a. The Severe Weather Plan shall identify and explain the systems or devices used to track and monitor approaching storms, effective distances for alerting personnel and suspending work, duties of persons responsible for plan implementation, means of communication for alerting site personnel and stay times and/or distances before resuming work.
  - b. Effective distances for work suspension, especially for elevated work and crane activities, shall provide personnel adequate time to stop work, secure items and be inside a safe shelter. At a minimum, effective distances and stay times shall meet or align with those published by a recognized source or creditable organization (e.g., National Oceanic and Atmospheric Administration (NOAA), National Lightning Safety Institute, OSHA, American National Standards Institute (ANSI), Center for Disease Control (CDC) / National Institute for Occupational Safety and Health (NIOSH), federal/state agency, or etc.).
  - c. The Severe Weather Plan must consider effective sheltering from lightning. Shelter determination should focus on evacuating to enclosed metal, masonry or wooden buildings, or enclosed metal vehicles or equipment. Open or unprotected areas are not lightning-safe.
2. If required, Contractor and subcontractors must follow the Duke Energy generation station's severe weather plan when activated.

**VEHICLE SAFETY & EQUIPMENT OPERATION**

1. Daily mobile equipment / vehicle inspection – Operators shall inspect all safety and operational features on a pre-shift basis. Operators shall visually check for leaks and/or signs of spilled fuel, oil, hydraulic fluid, grease, coolant, etc. during this inspection.
2. Contractor shall reverse park all vehicles on Duke Energy's premises, unless otherwise accepted by Duke Energy.
3. Mobile equipment and vehicles traveling in reverse, in congested areas, or near plant equipment shall always have an audible back-up alarm and Spotter.
4. Spotters shall be appropriately trained and qualified to perform the work, and they shall use a standard set of hand signals.

5. Contractors must ensure that Spotters are trained to fully understand their role and how it relates to the equipment operator, knowledge of specific equipment “blind spots” and how to assist the operator with dealing with them and a standard set of hand signals will be used that are understood by both the operator and spotter.
  - a. Operators will respond to Spotter directions when given.
  - b. Ensure that spotters stop work immediately when the location of anyone in the area is not apparent.
  - c. Spotters shall have no other duties when spotting vehicles/ equipment.
  - d. Ensure spotters work from positions where they can be seen by all involved in the operation.
  - e. Spotters shall maintain at least 25 feet of separation from mobile equipment.
  - f. Ensure operators stop if they lose visibility of their spotter.
6. At a minimum, the following the safety equipment / devices shall be installed on all onsite vehicles including all side-by-side / utility task vehicles (UTV's) and pick-up trucks (purchased or rented) used on Duke Energy's premises:
  - a. Seatbelts
  - b. Headlights (i.e., required for nighttime and/or low light conditions)
  - c. Roll-Over Protection System (ROPS)
  - d. Back-Up Alarm
  - e. Fire Extinguisher
  - f. For solar projects, the rows of solar arrays often obscure the ability to see the locations of ATVs. Contractors must ensure measures are taken to ensure ATVs are visible to other vehicles and pedestrians.
7. Contractor shall survey all power lines and overhead structures (e.g., bridges, conveyors, and pipe racks or bridges) on site. Contractor shall install warning signs and goal posts at all junctions where travel below energized power lines is required. Goal posts shall be installed a minimum of 20 feet on each side of the power line. Power lines that are low voltage, insulated or greater than 25 feet from ground elevation may be excluded from this requirement with documented Duke Energy approval.
8. Contractors must address any equipment with a rotating superstructure (cranes, high reach lifts, drill rigs etc.), to prevent unauthorized or unknowing entry into pinch-point areas of the rotating superstructure.

**MATERIAL LOADING AND UNLOADING**

1. To ensure control of truck loading and unloading and protection of affected personnel, contractors are expected to refer to PMC's Material Handling Standard (PMC-ENG-NA-STND-CN-0003), for additional methods to control related hazards.

**FALL PROTECTION**

1. No personnel or work operation is exempt from the 100 percent fall protection requirement (e.g., guardrail and/or personal fall arrest / fall restraint) when working at heights  $\geq$  6 feet.
2. Controlled Access Zones and/or Controlled Decking Zones are not permitted, unless otherwise approved by Duke Energy.
3. Any removal of grating or guardrail shall have protection installed to adequately control the fall hazard. Do not use red barricade tape (soft barricade) around the entrance or restricted access to an open hole or unprotected edge. Rigid barricades shall be utilized around fall protection hazards  $>$ 6 feet.
4. The use of beamers, cheaters, or other fall protection devices that allow workers to freefall greater than 6 feet shall not be considered an acceptable control measure.

**DROPPED/FALLING OBJECT PREVENTION**

1. Contractors are required to follow the Duke Energy EHS Handbook to control dropped/ falling objects. Additional controls are available in PMC's Dropped Object Prevention Standard (PMC-ENG-NA-STND-CN-0005).

**HAND AND POWER TOOLS**

1. Contractors shall ensure that portable grinders are equipped with a non-locking (i.e., dead man) trigger mechanism and shall be equipped with anti-kickback braking mechanism unless otherwise accepted by the Owner.

**HAZARDOUS ENERGY LOCKOUT/TAGOUT**

1. Contractors shall have a written Lockout/Tagout Program that addresses sources of uncontrolled energy that have the potential to cause personal injury. The program shall identify hazardous energy sources associated with work activities, locking and tagging procedures at isolation boundaries and verification of zero energy.
2. Contractor's site-specific safety orientation shall include Lockout/Tagout (LOTO) "Affected Employee" training for all employees, Subcontractors, vendors and visitors who work in an area where LOTO activities may occur.
3. Contractors may be subject to Duke Energy's control of hazardous energy procedures/LOTO program and shall abide by the provisions.

**POWER FACTORS TESTING**

Contractors performing Power Factor/ High Voltage testing (e.g., Doble Testing, Hi-Pot, Megger, etc.), shall have written procedures that addresses the following:

1. Testing shall be performed in accordance with the manufacturer's directions.
2. A Controlled Work Zone must be established around test equipment / apparatus and equipment being tested. Monitor the test area to keep unauthorized personnel or bystanders out of danger.
3. Only qualified electrical workers shall install and remove grounds.
4. The safety ground connection shall be applied to the test equipment according to the manufacturer instructions before making any other connections. Always connect leads to the test set prior to applying them to the equipment.
5. Before installing grounds, ensure proper isolation / clearance of conductors and equipment. Verify isolation / clearance from all voltage sources by means of visible open points according to switching instructions and test for voltage with an approved voltage detector.
6. Personal protective grounding can be removed for testing. This requirement shall be identified and addressed in the test procedure.
7. Cables and conductors, which are not under test that are in contact with the equipment being tested, shall also be grounded.
8. Additional administrative controls shall be used when the attachment of grounds to certain cables (e.g., DCS, signal, feedback, low voltage, etc.) is not feasible.
9. Class 2 rubber gloves or a live-line tool shall be used while handling test leads once the test leads are installed into the test set.
10. Workers shall not hold test leads to support them or contact test leads while they are energized during testing. Workers shall secure test leads, so they always remain under positive control during testing.
11. No other work activities shall be performed on any circuits associated with the component being tested during the testing period.
12. After performing any voltage-inducing test, the voltage switch on the test set shall be turned to the OFF position. Personnel shall verify the voltage detector drops to zero. Equipment shall be grounded to remove any capacitive charge. If possible, personnel shall leave a ground on the bushings or terminals that are not being tested to prevent voltage build-up.
13. Contractor shall utilize equipment as designed (i.e., do not modify switches). Safety switches or safety features shall not be bypassed, disabled, or modified.
14. Only the Test Set Operator and the person "hanging the hook / clamp" (Operator's Assistant) shall have the arming devices. It is not permissible to delegate the arming device to another person.
15. Test Set Operator shall establish and maintain visual contact with Operator's Assistant before the test begins. Radio contact alone between the Test Set Operator and the Operator's Assistant does not meet the requirement for visual (i.e., face-to-face) contact with these two individuals. Radio contact can be used to enhance communication.
16. If line of sight is not physically possible (e.g., extended distances, physical barriers / obstacles, or elevation changes), a third person (Designated Safety Observer) shall be used to provide verification to the Test Set Operator that the Operator's Assistant is free and clear of equipment prior to arming the test set and relay information back to the Test Set Operator if conditions change.
17. Designated Safety Observer shall maintain constant face-to-face contact with the Operator's Assistant and relay verification back to Test Set Operator that the Operator's Assistant is not in contact with test leads or parts of equipment that could become energized while testing is in progress.
18. If the Designated Safety Observer is in constant face-to-face contact with the Operator's Assistant, radio communication between the Safety Observer and Test Set Operator can be used to verify / confirm the Operator's Assistant is in a safe location. Without a third person observer in place, radio contact alone between two parties (e.g., Test Operator and Operator's Assistant) is inadequate.

19. Contractor shall use clear 3-way communication technique (i.e., Repeat Back Method) before energizing testing equipment and again when testing is complete.
20. After testing is complete, qualified electrical workers shall de-energize the circuit that was tested, reinstall protective grounds, and perform zero energy verification prior to re-entering the electrical enclosure and/or working on the equipment. Lockout / Tagout (LOTO) procedures may require additional steps or boundaries in order enter electrical enclosures.

**CRANES AND RIGGING**

1. For work scope involving cranes, rigging and lifting, Contractor shall provide Duke Energy a critical lift plan subject to review by Duke Energy.
2. Any lift not listed in section 6 below would be considered a normal lift. Complexity of a normal lift would determine the level of planning. Duke Energy and Contractor will agree to the degree of planning for normal lifts on an “as-needed basis”.
3. All rigging operations shall only be performed and/or supervised by a Qualified Rigger.
4. Contractor shall implement a permit process to coordinate multiple cranes and/or other boom-type equipment (e.g., aerial lift) sharing “air-space.” The permit shall require the review and approval by operators, signal persons, and all involved for affected equipment.
5. All critical lift plans shall be sealed by a Professional Engineer and provided to Duke Energy's representative before executing / performing critical lifts.
6. Critical lifts are defined as (1) any lift that utilizes more than one crane, (2) any lift involving a crane suspended work platform, including personnel baskets, (3) any lift over critical operating and/or process equipment (i.e., necessary for continual operation of the facility), (4) any lift that exceeds 75 percent of the crane's load chart (5) any lift within 10 feet of exposed energized equipment, (6) any lift within 50 feet of energized power lines, or (7) any crane setup / lift on a floating device, such as dock or barge.
7. Critical lift plans shall include crucial information and address key components of the lift ranging from the method of attachment to the load to any requirements for securing the load before unhooking. In addition, critical lift plans shall address soil bearing conditions and provide a written narrative describing the sequence of the lift with specific steps that explain key components, such as crane setup, proper installation of attachment points, and any temporary securement requirements before releasing load.
8. Contractors shall be responsible for obtaining and providing to Duke Energy lift information (e.g., load and material / equipment weight calculations) for materials and equipment from manufacturers that are delivered to the project site. This includes information that is intricate and necessary for safely unloading / loading equipment or materials, including but not limited to lifting lugs, spreader bars, and center of gravity.
9. Signal persons shall possess a whistle, air-horn, or other audible signaling device to warn of flying loads.
10. All rigging hardware (e.g., shackles, eyebolts, slings, and wire rope) shall be domestically manufactured and/or meet ANSI / ASME B30.20 criteria unless otherwise approved by Duke Energy.
11. Spreaders or lifting devices shall be certified and sealed by a professional engineer and the capacity shall be marked on the device. This includes design, inspection, and testing per the requirements of ANSI / ASME B30.20.

**TRENCH AND EXCAVATIONS**

1. Before starting construction, Contractor shall self-perform or have a third-party perform a “pre-construction” underground survey.
2. The pre-construction survey shall be conducted by utilizing a combination of ground penetrating radar (GPR) technology and/or electromagnetic (EM) testing equipment, site walk down, and research of historical information, drawings, and/or aerial photographs.
3. The methods (e.g., geophysical prospecting equipment) used to conduct the pre-construction underground survey will be determined by on-site conditions with the final decision made by - Duke Energy.
4. The underground survey shall be conducted for the Contractor's construction “limits of disturbance” with the completed survey / drawings / mapping provided to Duke Energy.
5. At existing facilities, a GPR survey shall be conducted over the entire area where soil will be disturbed and/or ground penetrations will be made.
6. On "green field" sites that have not been previously developed for industrial, commercial, or residential use, GPR and EM testing shall be conducted around the entire perimeter of the project site. Any underground utilities identified by GPR, EM testing, or locate services (e.g., One-Call or Call Before You Dig) shall be fully traced, physically marked, and documented (e.g., GPS location and depth). In addition, GPR and EM testing shall be performed over all utility corridors, surface depressions, or other suspect areas or anomalies identified in aerial photographs, historical research, and/or site walk downs.



7. Any Contractor whose scope includes trenching, excavation, or ground penetration activity shall submit Trench and Excavation Permits, subject to Duke Energy review and approval, identifying the excavation area, potential hazards, protective measures, and amount of time the permit will remain open. Trench and Excavation Permits shall be posted in a visible location at the work location and/or a copy shall be maintained inside the respective excavating equipment. All personnel involved in the trenching, excavation, or ground penetration work shall be briefed on the permit requirements and the job before starting work.
8. Trench & Excavation Permits shall only remain open for the time identified on the permit. Permits shall not remain open indefinitely and shall be closed / terminated once the task or work activity is completed.

**CONTAINMENT**

1. Temporary fuel and chemical storage tanks shall be double-walled or have outside containment that will contain the full volume of the tank plus 10 percent additional overboard. Containment shall be a lined berm or manufactured pop-up containment.
2. Protection shall be provided for drips, leaks and spills at all temporary fuel and chemical storage areas or tanks, including double walled tanks. The Contractor is responsible for registering the tank, if required by law, and maintaining any required Spill Prevention, Control, and Countermeasure (SPCC) Plans unless otherwise agreed to by Duke Energy.
3. Drip protection or containment shall be provided for all stationary mobile and heavy equipment.

**PROCEDURE DEVIATION DOCUMENTATION**

1. If exceptions to this document are made, any exceptions will be determined by Duke Energy.
2. To request a variance of any section of the EHS Supplemental Requirements document, Attachment 1 shall be completed and routed through the Duke Energy interface for approval by the PMC Vice President (VP). No changes to EHS supplemental requirements shall be implemented until a variance request is reviewed, approved, accepted, and signed.

**ENCLOSURE 1 - VARIANCE REQUEST**

**ENCLOSURE 1- VARIANCE REQUEST**

Date: \_\_\_\_\_ Location: \_\_\_\_\_

Project: \_\_\_\_\_

Supplemental Section#: \_\_\_\_\_ Subsection #: \_\_\_\_\_

Title: \_\_\_\_\_

**Variance Details:**

**Reason for Variance:**

Variance Requested By: \_\_\_\_\_ Date: \_\_\_\_\_

Variance: (Check One): Approved  Rejected  Date: \_\_\_\_\_

Variance Approved or Rejected By (Signature Required)

PMC VP or Designee: \_\_\_\_\_ Date: \_\_\_\_\_

**(Designee as determined by PMC VP)**