### **Industrial Hygiene Standard for Contractors** (CAN)





Item ID: CD90001052 Rev. #: 00 **Driver: Regulatory** Status: Published

### **Document Contact: Paul Somal**

#### **PURPOSE**

This standard is intended to outline expectations associated with fulfilling industrial hygiene occupational health and safety (OHS) requirements for Contractors working on a TC Energy site in Canada, and personnel who direct or coordinate that work. This document is intended to be referenced during the project planning phase, after the contractor has reviewed their planned work scope and determined if industrial hygiene hazards and requirements referenced in this Standard, or reasonably anticipated with the execution of the planned work scope. The hazards and requirements specified in this Standard are not intended to be exhaustive. The contractor may be required to meet additional legislative requirements not referenced in this Standard.

### **SCOPE**

This standard applies to all Contractors working at a TC Energy worksite who are required to meet legislative requirements of the jurisdiction in which the work is conducted. Requirements outlined in this document are in addition to existing TC Energy Specifications, Standard, and Processes.

Provincially regulated contractors working on a federally regulated worksite must comply with both applicable provincial and federal regulations. This document is intended to provide additional guidance on how to comply with provincial and federal regulations. Where a conflict between this document and legislation exists, the more protective of the two requirements shall prevail.

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#### 1. PROGRAM DEVELOPMENT

#### 1.1. Overview

1.1.1. Contractors are designated as Prime or Non-Prime Contractors at worksites.

#### 1.2. Prime Contractor

- 1.2.1. Prime Contractors must develop their own programs that meet the requirements of this Standard.
- 1.2.2. On federally regulated worksites, the program must meet the most stringent of the federal OHS legislative requirements and the provincial OHS requirements for the province in which worksite is located.
- 1.2.3. On provincially regulated worksites, the program must meet the applicable provincial OHS requirements for the province in which the worksite is located
- 1.2.4. Prime contractors are required to provide oversight of all activities at the worksite with industrial hygiene hazards to ensure the work is conducted in accordance with the developed procedure, hazard mitigations, and permits.

#### 1.3. Non-Prime Contractors

- 1.3.1. Non-prime contractors must develop programs that align to the requirements of this Standard.
- 1.3.2. On federally regulated worksites, the program must meet the most stringent of the federal OHS legislative requirements, and the provincial OHS requirements for the province in which the worksite is located.
- 1.3.3. On provincially regulated worksites, the program must meet the applicable provincial OHS requirements for the province in which the worksite is located
- 1.3.4. On federally regulated worksite, non-prime contractors must adhere to the minimum requirements within the documents outlined in <a href="mailto:section7.4">section 7.4</a>, TC Energy References.
  - 1.3.4.1 This requirement only applies to hazards anticipated at the worksite.

### 2. WRITTEN CONTROL PROGRAMS

2.1.1. The contractor must have effective written programs as required by the jurisdiction in which work is conducted, for named hazardous agents (e.g., benzene, asbestos, silica, and hydrogen sulfide), and other hazardous agents meeting specific criteria (e.g., provincial OHS). These written programs have prescribed elements and may

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be referred to as exposure control plans (ECPs), codes of practice (COPs), or control programs depending on the jurisdiction.

2.1.2. A plan and resources must be in place to identify, evaluate and control exposure to all hazardous agents or conditions.

#### 3. MANAGEMENT OF HAZARDOUS MATERIALS

### 3.1. Management of Chemical Products

- 3.1.1. The contractor must have a written program compliant with the most current version of the Workplace Hazardous Materials Information System (WHMIS) or Global Harmonized System (GHS).
- 3.1.2. The minimum required program elements are:
  - Chemical selection and approval
  - Safety data sheets (SDSs) management
  - · Chemical hazard assessment
- 3.1.3. Product labelling
- 3.1.4. Chemical handling
  - Storage
  - Transportation
  - First aid treatment, and
  - Training and education
- 3.1.5. The contractor is required to make SDSs readily accessible to their workers at all times and available to a TC Energy representative for review upon request. Examples of readily available SDS's include:
  - Physical copy of the SDS available at or near the location of the task
  - Digital copy of the SDS available for quick recall at or near the location of the task.
- 3.1.6. SDS's must be updated every 3 years, or when a new SDS is issued by the manufacturer, whichever date is most recent.
- 3.1.7. The contractor shall evaluate chemical products they intend to use and select a less hazardous product where feasible and practical.
- 3.1.8. The contractor is responsible for the lifecycle management of the chemical products they use at a TC Energy worksite. Lifecycle includes procurement,

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transportation, storage, handling, disposal and removal from site, unless prior alternate arrangement has been made with a TC Energy representative or another contractor.

### 3.2. Abatement of Hazardous Building Materials

- 3.2.1. TC Energy worksites may contain historical application and contamination of hazardous building materials, such as asbestos, lead, silica, polychlorinated biphenyls (PCBs), mercury and others.
- 3.2.2. Prior to performing abatement work, TC Energy must inform the contractor of the known or anticipated hazardous building materials associated with the abatement.
- 3.2.3. Contractors impacting or abating hazardous building materials are required to have a written program on how to safely manage exposure to hazardous building materials. The program must incorporate the following elements:
  - Identification and confirmation of hazardous building materials
  - Regulator and worksite notifications (if applicable)
  - Abatement procedures (if applicable)
  - Decontamination procedures (if applicable)
  - Training requirements
  - Control requirements:
    - Engineering (ventilation)
    - Administrative (Clean-up, and disposal)
    - o PPE requirements
- 3.2.4. The training requirements referenced in section 3.2.3 typically covers the following topics:
  - Hazard identification
  - · Health effects
  - Regulatory requirements
  - Control requirements
  - Safe handling and hazardous material containment strategies
  - Review of safe work procedures
  - Medical surveillance program (if applicable)
  - Disposal requirements
- 3.2.5. Contractors performing abatement work must have a program to protect workers from biological hazards associated with abatement activities including exposure to bird waste, rodent waste, and sewage waste.

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- 3.2.6. Prior to performing asbestos work, Contractors must complete a TC Energy Asbestos Exposure Control Plan. Template is provided by Industrial Hygiene.
- 3.2.7. Specific to asbestos, different jurisdictions require varying levels of asbestos training. See Table 1 below for applicable requirements.

**Table 1: Asbestos Training Requirements** 

Jurisdiction	Asbestos Training Requirements
Federal	Meeting the training requirements detailed in <u>Technical guideline to asbestos</u> exposure management programs
ВС	Asbestos Training, Certification & Licensing
AB	Asbestos Worker Training
SK	Meeting the competencies outlined in <u>Saskatchewan Asbestos Abatement</u> <u>Manual</u>
МВ	Meet the training requirements detailed in <u>Guide for Asbestos Management</u>
ON	Meeting the training requirements detailed in <u>Aguide to the Regulation respecting</u> <u>Asbestos on Construction Projects and in Buildings and Repair Operations</u>
QC	Meeting the training requirements of the <u>Quebec Safety Code for the Construction</u> <u>Industry</u>

### 3.3. NORM Management

- 3.3.1. For contractors performing work at a worksite where the presence of NORM is expected or suspected, the contractor is required to have a program that includes:
  - NORM source identification
  - Detection and bulk sample analysis
  - Hierarchy of controls
  - Transportation and disposal, and
  - Training and education
- 3.3.2. <u>Table 2</u> provides guidance on training recommendations for NORM related activities at a TC Energy worksite.
- 3.3.3. Contractors are permitted to provide their own equivalent training for NORMs, provided they can show proof of completion and a demonstration of course equivalency.

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- 3.3.4. Every worker who works on a worksite where NORM may be present must have at least an Awareness level of training.
- 3.3.5. Workers who operate a NORM meter or are tasked with directing activities involving NORM are required to have an advanced (Specialist) level of training and must be competent to operate a NORMs meter.

**Table 2: NORM Training Requirements** 

Course Name	Audience	Course Description	Delivery Method
Level 1: Awareness	Workers working near and around NORM contaminated equipment and material, but not directly on it.	A basic awareness of what NORM is, where it can be encountered, how it may impact the worker, and what the methods of protection are.	Online (45min) <u>NORM</u> <u>Awareness</u> <u>Training</u>
Level 2: Training	Workers conducting maintenance activities with potentially NORM contaminated equipment or material.	<ul> <li>A more in depth look at the NORM that may be encountered;</li> <li>Allows the worker to work on projects that may encounter NORM;</li> <li>Does NOT allow the worker to supervise such work;</li> <li>Does NOT allow the worker to perform NORM surveys using the approved equipment;</li> <li>Does NOT allow worker to collect samples.</li> </ul>	Online (1.5hr) <u>NORM</u> <u>Worker</u> <u>Training</u>
Level 3: Specialist	For workers responsible for gathering samples and conducting NORM surveys with detection equipment.	In-depth knowledge of NORM and measures taken to minimize exposure to NORM;  Proper handling of NORM contaminated waste;  How to perform NORM surveys;  How to collect NORM sample;  How to supervise others when working around NORM.	Online (3+ hours)  Advanced NORM Training AND NORM Meter Training





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### 4. MANAGEMENT OF WORKER EXPOSURES

### 4.1. Exposure Assessment Program

- 4.1.1. The contractor is required to develop a written program that details the company's approach to evaluating worker exposure to hazardous vapours, gases and particulates. Hazardous vapours, gases and particulates can arise from various products, commodities, byproducts and waste materials, construction and coating materials, natural occurring substances, chemical products, and hazardous construction materials referenced in section 3.0.
- 4.1.2. An exposure assessment program typically consists of the following 5 steps:
  - Hazard Identification: Recognizing and identifying potential chemical, physical, and biological hazards in the workplace.
  - **Exposure Monitoring**: Systematic measurement and analysis of workers' exposure levels to these hazards.
  - **Risk Assessment**: Evaluating the potential health risks associated with identified hazards and exposure levels.
  - **Control Measures**: Implementing engineering controls, administrative controls, and personal protective equipment (PPE) to minimize exposure and ensure compliance with provincial and federal occupational exposure limits (OEL).
  - Periodic Review and Update: Regularly reviewing and updating the exposure assessment program to ensure compliance with regulations and the data points are valid.
- 4.1.3. The contractor is required to demonstrate OEL compliance through documented sampling, risk assessments, or other generally accepted methods.
- 4.1.4. Contractors must comply with the most stringent of the provincial and federal OELs.
- 4.1.5. Exposure assessments must be completed by a competent person, commonly this includes a person with the following credentials:
  - Certified Industrial Hygienist (CIH), CIH candidate, or work is overseen by an accredited CIH
  - Registered Occupational Hygienist (ROH), ROH candidate, or work is overseen by an accredited ROH
  - Registered Occupational Hygiene Technologist (ROHT)

### 4.2. Noise Exposure Assessment

4.2.1. Noise exposure assessments must be completed routinely by the project to validate

Document Class: TOPS

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noise levels

- 4.2.2. Where noise levels exceed the exposure limit, hearing protectors must be prescribed to ensure workers attenuated exposure to noise is below the exposure limit.
- 4.2.3. Where hearing protection is required as per section 4.2.1, signage must be posted.
- 4.2.4. If signage cannot be posted or does not communicate the level of protection required, the requirements for hearing protection must be documented on workers field hazard assessment.
- 4.2.5. Noise exposure measurements must be evaluated against the regulated exposure limit, or the value in the hearing conservation program referred to in section 4.3.1. Where a conflict between the hearing conservation program and legislation exists, the more protective of the two requirements shall prevail.
- 4.2.6. Non-Prime contractors are permitted to adopt the TC Energy *Facility Occupational Sound Level Measurement Form* (Item ID <u>003886569</u>).
- 4.2.7. On construction sites, noise assessments must be completed routinely by the project to account for the evolution of the work environments and the dynamic nature of tasks performed.
- 4.2.8. Sound level measurements must be conducted and interpreted by a competent person. Competency includes knowledge of the limitations of the sound level meter, calibration operation, maintenance, and a basic understanding of noise exposure principles.
- 4.2.9. The sound level meter for field noise measurements must adhere to the following parameters:
  - Measure in A-weighted decibels (dBA)
  - Measure set to slow response
  - Correct application of all manufacturer required equipment including wind screens
  - Adhere to the manufacturer's calibration requirements, and
  - Be a type II measurement device

### 4.3. Hearing Conservation Program

4.3.1. The contractor is required to develop a written program that includes noise source identification, exposure evaluation, hierarchy of controls, hearing protective device (HPD) selection and maintenance, audiometric testing (where required by jurisdiction having authority), training, and education.

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### 4.4. Ergonomics Management

4.4.1. Where ergonomic risks are present in the workplace, the contractor should mitigate the hazards to as low as reasonably practicable to minimize the likelihood of developing either an acute or chronic injury.

### 4.5. Environmental Exposures Management

- 4.5.1. **Heat & Cold Stress**: The contractor is required to have programs that protect workers from heat and cold stress due to temperature extremes.
- 4.5.2. Contractors must provide training on the following topics related to heat and cold stress management:
  - Identification of extreme temperatures
  - Recognition of heat and cold stress signs and symptoms
  - Hierarchy of controls
  - First aid treatment
  - Training and education, and
  - Use of temperature screening devices such as a wet-bulb globe thermometer
- 4.5.3. **Lighting**: The contractor is required to supply sufficient lighting to allow work to be performed safely. This requires a competent person to use a light meter/illuminometer to take lighting measurements to ensure adherence to the more conservative of either the federal or provincial regulatory requirements.
- 4.5.4. **Wildfire Smoke**: The contractor must have a wildfire smoke management program. The program must include the following elements:
  - Recognition of wildfire smoke inhalation signs and symptoms
  - Air quality monitoring plan
  - Hierarchy of controls including the trigger for donning N95 respirators
  - First aid requirements, and
  - Training and education
- 4.5.5. **Insect Bites and Stings**: The contractor is required to provide guidance on recognition of common insects and their insect bites, awareness on allergies, hierarchy of controls, first aid treatment, and training and education.

### 4.6. Respiratory Protective Equipment (RPE) Management

4.6.1. The contractor is required to have a written Respiratory Protection program that includes these minimum elements:

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- 1. Hazard assessment
- 2. Respirator and cartridge selection
- 3. Cartridge change-out schedule
- 4. Storage, maintenance, and use
- 5. Maintenance of breathing air systems
- 6. Medical evaluation and fit testing, and
- 7. Training and education
- 4.6.2. All respirators must be NIOSH certified and maintain a NIOSH certification while at a TC Energy worksite. A list of NIOSH approved masks can be found on the NIOSH website.
- 4.6.3. To maintain a NIOSH RPE certification, users must not modify or exchange respirator parts/components unless those parts/components are on the NIOSH approval label or specified in the user instructions. Failure to comply with this requirement voids the NIOSH certification for the mask.
- 4.6.4. The use supplied air breathing systems must be maintained in accordance with CSA Z94.4 Selection, use, and care of respirators and CSA Z180.1 and CSA Z180.1, Compressed Breathing Air and Systems.
- 4.6.5. Supplied air breathing air systems with an operating pressure in excess of 15 psig are subject to additional maintenance requirements including breathing air quality analysis in accordance with CSA Z180.1, Compressed Breathing Air and Systems.
- 4.6.6. Frequency of fit-testing must adhere to any jurisdictional limitations, to a maximum frequency of once every 24 months.
- 4.6.7. All workers required to wear RPE must be able to present a valid fit-test record.

### 4.7. RPE Requirements for Welding and Grinding

- 4.7.1. The minimum RPE requirements for welding and grinding on a TC Energy worksite are prescribed in <u>Table 4</u>.
- 4.7.2. At the discretion of Industrial Hygiene, additional controls (engineering, administrative and enhanced RPE) may be required to mitigate welding fumes. Conditions that may necessitate enhanced controls include work scope, environment, and number of welders.

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**Table 4: Welding Respiratory Protection Equipment Requirements** 

Job Type	RPE Requirements*		
	WeldingShack	Trench or Excavation	Outdoor
Welder	<b>✓</b>	<b>~</b>	<b>~</b>
Welder's Helper	<b>✓</b>	<b>✓</b>	
Ancillary Worker	<b>~</b>	<b>√</b>	

<sup>\*</sup>Minimum assigned protection factor (APF) of 10, with P100 filters

- 4.7.3. Any welding work occurring within a confined space must be performed using one of the configurations outlined below to mitigate welding fume exposures:
  - A combination of air purifying respirators (tight-fitting half face or full face respirator) and a local exhaust ventilation system placed 8-10" from each point of welding, OR
  - A combination of powered air purifying respirators (PAPR) and general exhaust ventilation, OR
  - Supplied Air Respirator (SAR), OR
  - Self Containing Breathing Apparatus (SCBA)

### 5. ROLES AND RESPONSIBILITIES

Role or Department	Responsibilities
Project Manager	<ul> <li>Ensure all Prime Contractors and Non-Prime Contractors adhere to the requirements set forth in this document.</li> </ul>
	<ul> <li>Engage Industrial Hygiene where uncertainty regarding application of this document exists.</li> </ul>
	<ul> <li>Ensure the requirements within Industrial Hygiene Standard for Contractors (CAN) are incorporated into the contractor bid process.</li> </ul>





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Role or Department	Responsibilities
Construction Manager	Ensure all Prime Contractors and Non-Prime     Contractors adhere to the requirements set forth in this document.
	<ul> <li>Engage Industrial Hygiene where uncertainty regarding application of this document exists</li> </ul>
	Ensure any industrial hygiene data collection in the field is performed by a competent individual
	<ul> <li>Incorporate industrial hygiene hazards and controls into project hazard assessments, JSA's, pre-jobs, and tailgates.</li> </ul>
Safety Inspector & Safety Advisor	Provide guidance and mentorship on the application and expectations of this document
	Support variance application as required
	Ensure any industrial hygiene data collection in the field is performed by a competent individual
Industrial Hygiene	Provide guidance and mentorship on the application and expectations of this document
	Provide responses to all variance requests
	<ul> <li>Provide direction when enhanced controls for welding fumes may be required</li> </ul>
	<ul> <li>Provide direction with respect to competency and execution of industrial hygiene activities.</li> </ul>
	<ul> <li>Perform periodic reviews of contractor industrial hygiene programs, documents, risk assessments, training, JSA's, etc.</li> </ul>
	<ul> <li>Provide direction and feedback on contractor industrial hygiene management programs, including providing feedback and review on risk management.</li> </ul>
Workers	Complete all training as required
	Comply with all industrial hygiene requirements outlined in this document
	<ul> <li>Exercise stop work authority anytime a workers feels unsafe about performing an activity they about to undertake.</li> </ul>

### 6. VARIANCES

6.1.1. Any deviation from this standard's requirements must follow the Controlled

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Document Variance Procedure (CDN-US-MEX) (Item ID <u>007728702</u>). To initiate a variance request, external parties (e.g. contractors and manufacturers) must contact the Company.

6.1.2. Variance requests must demonstrate that all applicable legislative requirements and TC Energy requirements remain fulfilled.

### 7. REFERENCES

### 7.1. Definitions and Acronyms

Term	Definition
Code of Practice  Competent	As per the Alberta Occupational Health and Safety Act, is a written document that provides practical guidance on the requirements of the regulations or code applicable to the worksite. It includes safe working procedures in respect of the worksite and other necessary information to ensure that workers can safely perform their tasks.  Adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.
Contractor	As used in this document, a contractor that either designated as the "Prime Contractor", or a Non-prime contractor.
Exposure Control Plan	A written plan required by British Columbia's Occupational Health and Safety Regulations that specifies certain industrial hygiene hazards must be managed at the workplace.
Local Exhaust Ventilation System	Ventilation systems designed to capture air contaminants at the source, prior to dispersion into the atmosphere.  These systems operate by being placed close (a few inches) to the point of contaminant generation.
Non-Prime Contractor	A contractor that has not been designated as Prime Contractor in an agreement with TC Energy.
Occupational Exposure Limit (OEL)	A threshold that indicates the level of permissible exposure, for a set period of time, to a chemical or physical hazard that is not likely to adversely affect the health of a worker.
Prime Contractor	As used in this document, is a contractor that:  • Has been designated "Prime Contractor" in an agreement with TC Energy

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Term	Definition
Readily Accessible	SDS accessibility includes either a physical copy, or a reliably accessible electronic version.
Site/worksite	A TC Energy location where an employee, contractor, or other personnel is, or is likely to be engaged in any occupation.
TC Energy	Refers to any entity of TC Energy including TransCanada Pipelines Limited, Nova Gas Transmission Limited (NGTL), Foothills Pipeline (AB), Foothills Pipelines (Southern BC), Foothills Pipelines (SK), TQM Pipelines and Company Limited Partnership, Coastal Gaslink Pipeline Limited Partnership.
TC Energy Representative	Person or persons designated to act on behalf of TC Energy to manage the scope of work performed by contractors for facilities maintenance and construction in accordance with the terms, conditions and specifications of the Agreement.
Worker	Refers to any person involved in the Project, including TC Energy employees, third-party contractors, subcontractors and Prime/General Contractor representatives
TC Energy Asbestos Exposure Control Plan	A document template issued by TC Energy that adheres to Canada's Occupational Health and Safety Regulations that require an exposure control plan to be developed for low, medium, and high-risk asbestos activities.

### 7.2. Regulations, Codes and Standards

Organization	Title
Government of Canada	Canadian Occupational Health and Safety Regulations
Province of Quebec	Safety Code for the Construction Industry
Province of Ontario	Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations
Province of Manitoba	Workplace Safety and Health Act
Province of Saskatchewan	Occupational Health and Safety Regulations
Province of Alberta	Occupational Health and Safety Code
Province of British Columbia	Occupational Health and Safety Regulation

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Organization	Title
Province of Alberta	Occupational hygiene reports: requirements and tips (Dec
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### 7.3. Industry Publications and References

Organization	Title
Canadian Standard Association (CSA)	Z180.1:19, Compressed breathing air and systems
Canadian Standard Association (CSA)	Z94.4-18, Selection, use and care of respirators
Canadian Standard Association (CSA)	Z94.2-14, Hearing protection devices – Performance, selection, case, and use

### 7.4. TC Energy References

Latest versions of all TC Energy controlled documents can be accessed from the <u>Controlled Document Library</u>.

Title	Item ID
Asbestos Management Procedures Canada and Mexico	<u>003671361</u>
Benzene and Hydrocarbon Exposure Control Procedure	006181613
Ergonomic Hazard Control Program	003721953
Facility Occupational Sound Level Measurement Form	003886569
Handling and Storage of Compressed Gas Cylinders and Compressed Air	003849807
Hearing Conservation Program	005405301
Heat and Cold Stress Procedure	003871937
Hydrogen Sulphide Exposure Control Procedure Gas Operations and Energy Facilities	003671879

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Lead Exposure Prevention Procedure	003886482
Manual Materials Handling Policy	003879368
Mercury Exposure Control Procedure	003873976
Naturally Occurring Radioactive Material (NORM) Exposure Control Procedure	1017021920
Occupational Health & Hygiene Management Program (CAN-US-MEX)	014236186
Polychlorinated Biphenyl (PCB) Exposure Control Procedure	1017131814
Portable Gas Detection of the Atmosphere	003835957
Portable Gas Detector Standard (CDN-US-MEX)	008853784
Product and Chemical Approval and Handling Procedure	003839083
Rodent Infestation and Hantavirus Exposure Control Procedures	003835898
Safe Handling of Pyrophoric Iron Sulfide in Pipeline Facilities	006124435
Silica Dust Exposure Control Procedure	1013569721

### 8. LATEST REVISION AND APPROVALS

Approvals were captured electronically and attached to the published document.

Description of Change	New document providing expectations on how to fulfill industrial hygiene requirements.
Document Management of Change	CDL DMOC# 7236
Document Contact	Paul Somal Industrial Hygienist Canada Safety
Document Owner Manager	Tyler Kirkpatrick Contractor Safety, Manager Canada Safety

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