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1.0 INTRODUCTION

1.1 Purpose

The purpose of this document is to establish and maintain sanitary requirements for the protection of heath of employees, contractors and visitors at the Anacortes Refinery.

1.2 Scope

The document applies to all properties that are permanent places of employment owned by Marathon Petroleum Company (MPC) in Anacortes, Washington.

2.0 REFERENCES

2.1 Marathon Standards, Policies & Procedures

- HLT-2036 Sanitation Standard

2.2 Government Regulations

- OSHA 29 CFR 1910.141, Sanitation

3.0 DEFINITIONS

The following definitions are applicable to this procedure.

Table 1 Definitions

Term	Description
Employee	Any Marathon employee, including full-time, part-time, student co-ops, interns, casual or seasonal.
Leased Location	Locations with structures being used with the same intent as a Permanent Place of Employment, but is not owned by MPC (i.e., trailers, office buildings).
Permanent Place of Employment	Facilities in which employees are present or stationed.
Personal Service Room	A room used for activities not directly connected with the production or service function performed by the establishment. Such activities include, but are not limited to, first-aid, medical services, dressing, showering, toilet use, washing, and eating.
Potable Water	Water which is free of pollution, contamination, minerals or infection and is approved for domestic consumption by the authority having jurisdiction, or, in the absence of such authority, water meeting the requirements of the World Health Organization (WHO) and/or the agency with jurisdiction.
Sanitary Condition	A physical condition of working quarters and items which will tend to prevent the incidence and spread of disease.

4.0 ROLES AND RESPONSIBILITIES

The table below describes the roles and responsibilities related to this document:

Table 2 Roles and Responsibilities

Roles	Responsibilities
Refinery Management	• Be aware of the requirements of this standard. • Ensure that the requirements of the Sanitation Standard are implemented at the Anacortes Refinery. • Communicate Sanitation concerns with Plan Administrators.
Safety Supervisor	• Identify areas of the standard that are not met. • Implement the requirements of the standard to ensure compliance. • Maintain written plan as necessary. • Conduct periodic review of Sanitation Program. • Mitigate sanitation issues when necessary to maintain compliance with standard.
MPC Employee	• Follow requirements and guidelines of the sanitation standard. • Notify Supervisor of sanitation issues or problems.
Contractor Employee	• Follow requirements and guidelines of the sanitation standard. • Notify Supervisor of sanitation issues or problems.

5.0 REQUIREMENTS

5.1 Housekeeping

5.1.1 All places of employment shall be maintained in a Sanitary Condition.

5.1.2 The floor of every work area shall be maintained, cleaned and, so far as possible, kept in a dry condition. Where wet processes are performed, suitable floor drainage shall be maintained. If dry standing and walking surfaces cannot be maintained, anti-slip surfaces shall be provided.

5.1.3 Cleaning and sweeping shall be done in such a manner as to minimize the amount of dust in the air.

5.2 Waste Disposal

5.2.1 Any receptacle used for solid or liquid waste or refuse that will become putrid shall be so constructed that it does not leak and may be easily and thoroughly cleaned. It shall be maintained in a Sanitary Condition. Such a receptacle shall be equipped with a tightly fitted cover, unless it can be maintained in a Sanitary Condition without a cover.

5.2.2 All sweepings, solid or liquid wastes including industrial wastes, refuse and garbage shall be removed in such a manner as to avoid creating a menace to health and as often as necessary to maintain the place of employment in a Sanitary Condition.

5.3 Rodent, Insect and Vermin Control

Subsections marked with a double asterisk (**) indicates Leased Locations are exempt.

5.3.1 Every enclosed workplace and Personal Service Room shall be constructed, equipped and maintained, so far as is reasonably practical, in such a manner as to prevent the entrance or harborage of rodents, insects, and vermin of any kind.

5.3.2 Only those pesticides approved by the local authority having jurisdiction shall be utilized. In the case of no local authority having jurisdiction, the ES&S department shall be utilized.

5.3.3 **Pesticides shall be applied by personnel in accordance with the application rates on the label, Safety Data Sheet, or technical literature. Trained and licensed personnel shall apply the pesticide(s) if required by an authority having jurisdiction, label, or Safety Data Sheet.

5.3.4 The method of disposal of rodents, insects, vermin and droppings of the aforementioned shall follow the requirements of Section 3.0 and shall not endanger the health of employees.

5.4 Indoor Air Quality

5.4.1 Indoor air quality shall be maintained in a manner in which there are no known contaminants at harmful concentrations as determined by authorities and with which a majority of the people exposed do not express dissatisfaction. All indoor air quality complaints shall be investigated by competent individuals.

5.4.2 In the event that air or surface contamination is detected at a harmful concentration, appropriate abatement shall be performed by the Anacortes Refinery.

5.5 Potable Water

5.5.1 An adequate supply of potable water shall be provided for drinking, washing and cooking purposes in all permanent places of employment. These required elements may also be met by the use of portable containers such as bottled water or potable water containers that are sealed, labeled with the fill date and maintained in a Sanitary Condition.

5.5.2 Where drinking water is cooled by ice, the construction of the container shall be such that the ice does not come in direct contact with the water unless the ice is made from potable water and is protected from contamination between the point of manufacture and the point of use.

5.5.3 Containers such as barrels, pails or tanks from which drinking water must be dipped or poured, whether or not they are fitted with a cover, shall not be allowed.

5.5.4 A drinking cup and other common utensils shall not be shared between multiple people unless it has been cleaned to a Sanitary Condition before use by another person.

5.5.5 Where single-server cups (to be used once) are supplied, a container or surface maintained in a Sanitary Condition shall be used for the storage of

unused cups. A receptacle for disposing of the used cups shall also be provided and maintained in a Sanitary Condition.

5.5.6 There shall be no cross-connection, open or potential, between a system furnishing potable water and a system furnishing non-potable water, or carrying waste water.

5.6 Non-Potable Water

5.6.1 Outlets for non-potable water, such as water for industrial or fire-fighting use, shall be clearly labeled.

5.6.2 Non-potable water shall not be used for bathing or washing of the person, or for washing clothing or dishes, except as specifically permitted by the local health authority having jurisdiction.

5.7 Backflow Prevention Devices

5.7.1 A suitable backflow prevention device shall be installed to prevent contamination of the potable water system.

5.7.2 The Anacortes Refinery shall have and maintain a backflow prevention device inspection and maintenance program, SR-65 Domestic Potable Water System. Form HLT-F2036A can be used by the location as a guideline.

5.8 Legionella

5.8.1 Legionella bacteria are common in natural water sources. They may also contaminate and grow in other water sources such as cooling towers and hot and cold water systems. Each Component shall develop procedures to minimize the risk of legionella contamination in accordance with the requirements of this Standard.

5.8.2 Risk assessments shall be conducted to assure that the appropriate controls to prevent legionella growth are utilized and to assure maintenance employees servicing water systems are provided with the appropriate PPE. A Legionella Risk Assessment Guidance document can be found in Appendix A.

5.8.3 Risk assessment results and findings shall be documented.

5.8.4 In accordance with the local authorities having jurisdiction, an appropriate water treatment method shall be applied to mitigate legionella from any contaminated system.

5.9 Toilet Rooms

5.9.1 Every permanent place of employment shall be provided with adequate toilet facilities maintained in a Sanitary Condition. Where ten persons or less are employed, a single toilet may be provided for both sexes if provision for complete privacy is made. Where more than ten persons are employed, separate facilities shall be provided for each sex and properly labeled unless all employees are the same sex. Appropriate measures should be taken to accommodate visitors of the opposite sex.

5.9.2 The sewage disposal method shall comply with the requirements of the local authority having jurisdiction.

5.9.3 MPC Employees working on sewer systems shall be provided with adequate personal protective equipment (PPE), including at minimum safety glasses and impervious gloves, suits, and boots.

5.9.4 MPC employees working on sewer systems shall conduct appropriate atmospheric monitoring before any entry into sewer systems where atmospheric hazards may be present. Requirements of the applicable Confined Space Standards shall be followed if the sewer system meets the definition of a confined space.

5.10 Washing Facilities

5.10.1 Adequate facilities for maintaining personal cleanliness shall be provided and maintained in a Sanitary Condition.

5.10.2 Lavatories with adequate hot (110°F to 120°F) and cold potable water, shall be provided at all permanent places of employment. A dispenser containing a suitable skin cleaning agent shall be provided. Individual hand towels, or sections thereof, of cloth or paper, warm air blowers, or clean individual sections of continuous cloth toweling shall be provided convenient to the lavatory.

5.10.3 Components should post signs in washing facilities at permanent places of employment requiring personnel to wash their hands after toileting and before returning to work.

5.10.4 Where employees are exposed to skin contamination with toxic, infectious, or irritating material, or where hot, wet or dirty conditions require bathing before leaving the job, showers in the ratio of one shower for each fifteen persons so exposed on the largest work shift shall be provided. Showers shall be supplied with ample hot (110°F to 120°F) and cold potable water and shall be located in a Personal Service Room. A dispenser containing a suitable skin cleaning agent shall be provided.

5.10.5 For locations where portable toilets are utilized or where adequate potable water is not available, alternative means of sanitization, such as antibacterial hand gel, shall be provided.

5.11 Changing Rooms

5.11.1 Where employees' work clothing is exposed to contamination by toxic, infectious or irritating material, facilities shall be provided in changing rooms so that street and work clothing will not be stored in contact with each other.

5.11.2 Facilities shall be provided for safe handling and storage of work clothing which has become contaminated with toxic, irritating, or infectious material prior to laundering.

5.12 Commissaries, Lunch Rooms, and Break Rooms

5.12.1 In facilities or operations where there is potential exposure to injurious dusts or other toxic materials, a separate lunch room shall be maintained unless it is convenient for the employees to lunch away from the premises.

5.12.2 Adequate washing facilities shall be provided in locations convenient to toilet rooms and/or food service employees.

5.13 Food Service

5.13.1 No food shall be stored, prepared, or eaten where any toxic materials, substances or pathogens which may contaminate the food in quantities or concentrations that may be injurious to health may be present.

5.13.2 All employee food service facilities and operations (Marathon Business Continuity Plan - third party) shall meet the applicable law, ordinances and regulations of the local authority having jurisdiction.

5.13.3 All food service employees must wash their hands with soap and water when they arrive at work and before starting food preparation.

5.13.4 All food service employees must wash their hands with soap and water after using the toilet, and any time after their hands come in contact with known sources of bacteria, pathogens or toxins.

5.13.5 Food service employees must wear clean clothes.

5.13.6 Food service employees with long hair must wear hats, hair nets or other form of hair restraint approved by Anacortes MPC management.

5.13.7 Food service employees with cuts or sores on their hands must wear disposable latex gloves, finger cots or other universally accepted waterproof methods of protection, as needed.

5.13.8 Food service employees with diarrhea or severe coughing are not allowed to work.

5.13.9 Food service employee coats and other private articles must be stored in a designated area.

5.13.10 Food service employees shall eat only during assigned breaks, not while working in the kitchen.

5.13.11 Food preparation areas are limited to food service employees only.

5.14 Special Circumstances

5.14.1 During natural disasters, the business continuity plan shall be implemented. Appropriate decisions shall be made in order to maintain the workplace in a Sanitary Condition. When necessary, see the pandemic plan measures for advanced infection control strategies.

5.14.2 Potentially contaminated sickrooms, surfaces, and objects shall be disinfected in accordance with the requirements of the authority having jurisdiction

6.0 REVIEW AND REVISION HISTORY

Revision #	Preparer	Date	Description
0	Kelly Codlin	11/22/2021	Original Release

7.0 APPENDIX A – NON-MANDATORY LEGIONELLA RISK ASSESSMENT

References: Legionnaires' disease. The control of legionella bacteria in water systems. Approved Code of Practice and Guidance L8 (Second Edition).

Legionella bacteria are common in natural water courses such as rivers and ponds. Since legionella are widespread in the environment, they may contaminate and grow in other water systems such as cooling towers, evaporative condensers and hot and cold water services.

They survive low temperatures and thrive at between 68-113°F if the conditions are right (e.g., a supply of nutrients such as rust, sludge, scale, algae, and other bacteria). They are killed by high temperatures.

General Risk Assessment:

1. Are conditions present which will encourage bacteria to multiply? (e.g., is the water temperature between 68-113°F?)
2. Is it possible that water droplets will be produced and, if so, could they be dispersed over a wide area? (e.g., aerosols from cooling towers)
3. Is it likely that anyone particularly susceptible will come into contact with the contaminated water droplets?

Cooling Tower Risk Assessment:

1. Is there a plan for controlling the risk from exposure to legionella bacteria?
2. Does the plan contain an up-to-date plan of the system?
3. Does the plan show all cooling towers, system control valves, standby equipment, the location of system bleed valves, associated storage tanks, associated pipe work, chemical dosing points and/or injection points, the location of the system drain valve, origin of the water supply, and any parts that may be temporarily out of use?
4. Does the plan contain instructions for operating the system?
5. Does the plan contain details of the precautions to be taken to control the risk of exposure to legionella bacteria?
6. Does the plan contain details of the checks that are to be carried out (and their frequency) to ensure that the plan is effective?
7. (For new towers) Have you considered the position of the cooling tower in relation to air conditioning and ventilation inlets, opening windows, and/or occupied areas?
8. Is the tower constructed from impervious materials?
9. Are drift eliminators fitted? Are they fitted correctly and effective?
10. Is the area above the pond as enclosed as possible?
11. Are all visible surfaces free from slime, algae, scale, and corrosion?
12. Does the water flow evenly across the fill pack?
13. Have all of the following been removed as far as possible: dead legs/blind ends, redundant pipework, or redundant plant?
14. Are those parts of the tower that become wet accessible and/or removable for cleaning?
15. Is the system in regular operation?

16. Are there procedures in place to operate standby equipment on a rotational basis?
17. Is there an operations manual for the cooling tower?
18. If the tower is used intermittently or is required at short notice, is it run at least once a week, so that water treatment chemicals are circulated to all parts of the system?
19. If the tower is out of use for longer than a week, are there procedures in place to bring the tower back into operation safely?
20. Is there a water treatment program in place?
21. Are there chemicals/biocides used to control scale, corrosion, fouling, and/or microbial activity?
22. If non-oxidizing biocides are used, are two used alternately?
23. Are chemicals dosed automatically? If yes, are the pumps calibrated regularly?
24. Is there a daily check to make sure that they system is operating as described in the operations manual?
25. Is there a daily visual check of the cleanliness of the water in the system?
26. Is the physical condition of the system checked at least every week?
27. Is the chemical composition of the cooling and make-up water monitored on a regular basis?
28. Are the safe operating limits for each parameter which is being measured, known and recorded in the operations manual?
29. Is the corrective action for out of limit situations known and included in the operations manual?
30. Are results of all tests and checks recorded, together with details or any remedial action taken (if required)?
31. Are dip slides taken on at least a weekly basis?
32. Are slides incubated in an incubator (at 86°F for 48 hours)?
33. Are results recorded, so trends over time can be seen?
34. Are samples for legionella taken on at least a quarterly basis?
35. Have the circumstances when more frequent sampling maybe be required been identified and recorded?
36. Is there a written procedure for regular cleaning and disinfection of the system?
37. Does this take place at least every six months?
38. Does the cleaning and disinfection procedure include: initial concentration of oxidizing biocide in use for the pre- and post-cleaning disinfection stages, contact time for each disinfection stage, and methods of carrying out cleaning, including the removal of packing?
39. If packs cannot be removed, are there alternative methods of making sure they remain clean? (List).

Hot and Cold Water Services

1. If packs cannot be removed, are there alternative methods of making sure they remain clean? (List).
2. Is there a written plan for controlling the risk from exposure to legionella bacteria?
3. Does the plan contain an up-to-date plan of the system?
4. Does the plan contain instructions for the operation of the system?

5. Does the plan contain details of the precautions to be taken to control the risk of exposure to legionella?
6. Does the plan contain details of the checks that are to be carried out and their frequency) to ensure that the plan is effective?
7. If designing a new system, do any of the materials or fittings used in the water systems support the growth of micro-organisms?
8. Are low corrosion materials used?
9. If fitted, are thermostatic mixing valves (TMVs) sited as close as possible to the point of use?

For Cold Water Systems:

1. Are low use outlets installed upstream of higher use outlets?
2. Is the piping insulated and kept away from heat sources where possible?
3. Is the cold water tank fitted with a cover and insect screen(s) on any pipe work open to the atmosphere, located in a cool place, protected from extreme temperatures, and accessible?

For Hot Water Systems:

1. Does the hot water heater storage capacity meet normal daily fluctuations in hot water use while maintaining a supply temperature of at least 122°F?
2. Are the hot water distribution pipes insulated?
3. If more than one hot water heater is used, are they connected in parallel?
4. If the water supplied to your building is not main supply, has the water been pre-treated to make sure it is of the same quality as the mains?
5. Are the entire contents of the hot water heater, including the base, heated to 140°F for an hour each day?
6. Are all outlets that are no longer required cut back as far as the main pipe run?
7. Are there arrangements to incorporate standby equipment, for example hot water heaters, or pumps, into routine use?
8. If little used outlets have not been removed, are there arrangements in place to either flush them through on at least a weekly basis (with records kept of this) or to carry out a safe purge of stagnant water before use?
9. Is there a water treatment program in place?
10. Is temperature used as a control method?
11. Are biocides used as a control method?
12. If there is risk of scalding, are thermostatic mixing valves fitted?
13. Is the temperature of sentinel hot and cold water outlets checked on a monthly basis?
14. If fitted, is the temperature of the water supply to thermostatic mixing valves checked on a monthly basis?
15. Is the temperature of the water in the outlet and return pipes of the hot water heater checked on a monthly basis?
16. Is the temperature of the incoming cold water supply checked on a six-month basis?

17. Is the temperature of a representative number of hot and cold water outlets checked on an annual basis?
18. Is the control level of biocides known and recorded in the operations manual?
19. Is the rate of release/rate of addition of biocide known and recorded?
20. Is the concentration of the biocide at sentinel outlets checked on a monthly basis?
21. Is the concentration of biocide checked at representative outlets on an annual basis?
22. On an annual basis, is there: a visual check of the cold water tank and the water in it, a check to see if there is reasonable flow through the cold water tank, a drain of the hot water heater and a check for debris, a check on the plans for the hot and cold water circuits to make sure they are up-to-date, and a check on the existence of all water connections to outside services?
23. Are there procedures in place to identify circumstances when either general microbiological monitoring or sampling for legionella would be appropriate?
24. If there are procedures in place, do these identify where samples should be taken, and the frequency and actions required?
25. Have the circumstances when cleaning and disinfection of the hot water system would be appropriate been identified?
26. If the cleaning and disinfection were to be carried out, would a chemical or thermal method be used?