

This submission is for the Request for Comments by the Pennsylvania Department of Environmental Protection for the "Regional Energy Access Expansion Project".

On behalf of the Teamsters National Pipeline Labor Management Cooperation Trust (LMCT) representing the Teamsters Union and the Pipe Line Contractors Association (PLCA) we support the building of the "Project" if they utilize Teamster union member pipeline workers and our union contractors.

We have contractors who specialize in pipeline work that involve rivers, wetlands and waterways. (Exhibit A)

Our trained Teamster workforce operates this specialized equipment in a skilled and environmentally friendly manner.

Our Teamster Pipeliners who reside in Pennsylvania where the Project would be constructed also fish and hunt in this state.

Therefore, they value protecting the environment while doing the construction and restoring the land so they can continue to participate in these recreational activities.

This will only enhance their safety and environmental concerns and awareness during construction and restoration.

Another part of the collective bargaining agreement is a formal "Drug and Alcohol" Policy. A drug and alcohol free work force is less likely to have accidents or damage the environment since they will not work under the influence of drugs or alcohol that can negatively impact their judgment and quality of the work. (Exhibit B)

According to our collective bargaining agreement our workers must be qualified. The contractors demand strict adherence to this language. (Exhibit C)

This ensures a more skilled and trained workforce so it is less likely there will be any environmental issue.

We have certified Training Instructors and a training program specific to the pipeline construction industry stressing quality of work and environmental awareness.

Training not only includes Defensive Driving techniques but often-formal classroom instruction in addition to specific equipment training. (Exhibit D)

Some of our Trainers have been cited by outside Safety Organizations for their expertise and training skills. (Exhibit E)

Many Teamster workers on the "Project" will be Veterans coming out of Veteran Programs we participate in to recruit our former military men and women. (Exhibit F)

These Teamster Veterans are disciplined and taught about being aware of their natural surroundings both while serving in the military and undergoing our training programs.

Our training program, veterans program, high wages and employer paid health insurance and pensions only enhance our Union Contractors ESG score. (Exhibit G)

In closing, based upon the Teamsters Training specific to pipeline work, the contractually mandated safety and pipeline specific qualifications listed in the collective bargaining

agreement promoting quality work the Teamsters National Pipeline LMCT supports the building of the "Project".

The above comments should help to mitigate and address the concerns on the Environmental Issues.

Therefore, FERC should mandate that any pipeline projects under their domain should be performed under a Union Project Labor Agreement as a condition for approval.

EXHIBIT A

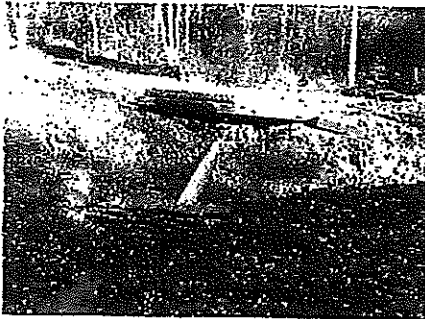
PIPELINE CONSTRUCTION PROCESS

1.



In order to make the right-of-way into a suitable work area, a **clearing and grading** crew prepares the pipeline corridor so the construction equipment can operate safely.

2.



All **waterway crossings** are flagged prior to clearing to indicate the minimal disturbance zone where equipment and work activities are restricted until the waterway crossing takes place. Access over watercourses is facilitated by using portable bridges installed to span the waterway. For more information, see **WATERWAY CROSSING METHODS** on page 4.

3.



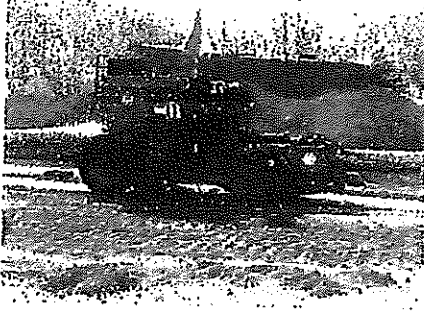
Next, the mechanical excavation of a trench, dug to a specified depth for pipe placement, is done by the **trenching** crew. Occasionally, rock drilling and blasting is required to break rock in a controlled manner.

4.



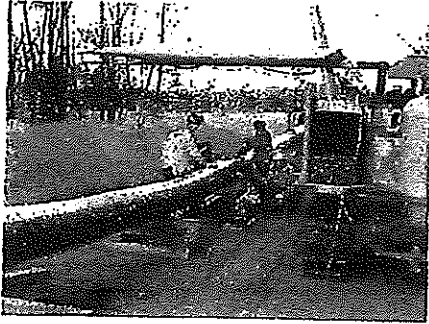
After the pipe is delivered to the right-of-way, the contractor "**strings**" segments of steel pipe by laying the pipe joints on wooden skids adjacent to the trench.

5.



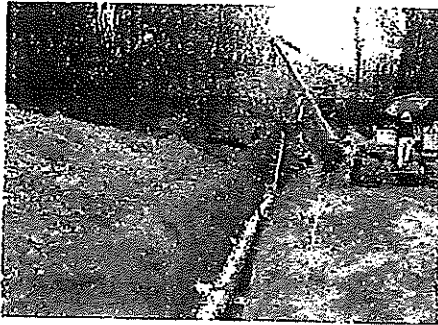
A **bending** machine is used to tailor the shape of the pipe to conform to the contours of the terrain or to make changes in the direction of the line.

6.



The **welding** crew begins the process of joining the steel pipe into long continuous segments. Welds are then radiographically inspected (X-rayed) to assure pipe joints have been welded in accordance with project specifications.

7.



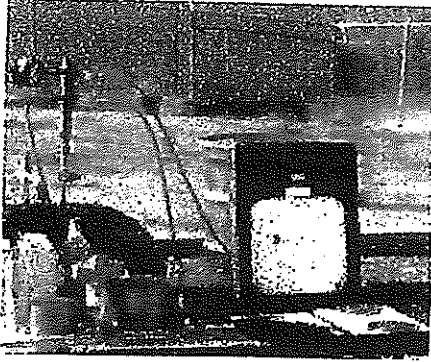
The pipe joints are cleaned and coated and the ditch bottom is cleared of rocks and debris or padded with soft dirt and the pipe is **lowered-in** to the ditch by sideboom tractors using belts or cradles in a carefully coordinated action. The ends of the pipe segments are then welded together to form one continuous pipeline.

8.



The trench is then **backfilled**. When soil conditions are not suitable to be directly placed on the pipe, specialized equipment designed to pad the pipe and protect it from sharp rocks and abrasion is utilized.

9.



The newly constructed pipeline must be subjected to **pressure testing** before it can be placed into service. The purpose of a pressure test is to assure that no defects exist within the pipeline that might threaten its structural integrity. After the test, the pipeline is dried, cleaned and connected to the existing pipeline system.

10.



The final phase of the construction is **cleanup and restoration** of the right-of-way. This involves replacing topsoil, replanting the right-of way, removing construction material, and restoring the area, as closely as possible, to its original pre-construction condition.

WATERWAY CROSSING METHODS

There are four basic methods for crossing waterways. The crossing method selected for a particular waterway depends on its width and depth, flow rate, environmental sensitivities, adjacent land use and soil conditions.

1. **Open-Cut Wet-Ditch Method**

The open-cut wet-ditch method of construction consists of digging an open trench through the undiverted flow of the waterway, laying a prefabricated section of pipe and then backfilling.

2. **Open-Cut Dry-Ditch Method**

The open-cut dry-ditch method of construction uses sand bags to divert the flow of water through flume pipe(s) that span the construction area to facilitate dry construction conditions and inhibit water quality impacts.

3. **Dam & Pump-Around Method**

The pump-around method of construction can act as a substitute to the open-cut dry-ditch method of construction for narrow, low-flow streams. In application, small sand bag dams are constructed both upstream and downstream around the work area across the stream channel. Stream flow is then diverted around the work area using pumps and hoses.

4. **Horizontal-Directional Drilling (HDD) Method**

Installation of a pipeline by HDD is generally accomplished by drilling a directionally controlled hole beneath the waterway and subsequently pulling a pre-fabricated pipe section through.

EXHIBIT B

procedure set out above, the Association will immediately contact the Federal Mediation and Conciliation Service to obtain a list of three (3) individuals with as much experience and knowledge as possible in the pipeline construction industry. A copy of this list will be furnished to the Union, and thereafter, the PLCA and Union shall attempt to mutually agree upon one (1) of the individuals listed. If no agreement can be reached, the Union and the PLCA will each strike one (1) name from the list and the remaining individual will be the Arbitrator.

3. A statement of the facts shall be presented to the Arbitrator within forty-eight (48) hours after his selection either:

a. Jointly, if the Union and PLCA mutually agree; or

b. Separately, if no mutual agreement, and the Association will submit a written statement setting out the Employer's position and the Union will submit a written statement setting out the Union's position.

4. All information submitted to the Arbitrator will be in writing. No personal appearances or oral testimony will be allowed. The Arbitrator will then issue, within five (5) days, a decision based upon the evidence submitted.

(G) The Union and the Employer involved shall bear the expense of their appointed Arbitrators. In the event an Arbitrator from the Federal Mediation and Conciliation Service is selected, then the Union and the Employer shall be jointly responsible for that person's expenses.

(H) In the event Employer fails or refuses to comply with the grievance procedure set out hereinabove, the provisions of Article IX shall not be binding upon Union. If Union fails or refuses to comply with the grievance procedure set out hereinabove, the Employer shall have the right to declare this entire Agreement null and void.

XII. SPECIAL CONDITIONS

In order to be more competitive in certain areas of the country, the PLCA and the Union may mutually agree to put into effect special wages and conditions for specific areas or projects. These special wages and conditions will apply to the areas or projects involved for the period of time to be established by the principal parties.

XIII. DRUG AND ALCOHOL TESTING

(A) A Substance Abuse Policy has been negotiated by the PLCA and the International Brotherhood of Teamsters and is attached hereto and made a part of this Agreement as Schedule "C".

(B) If an Employee fails a pre-employment drug or alcohol test and is so notified by 9:00 a.m. on the fifth business day following the day of taking the test, then the Employee's wage rate shall not be the hourly wage rate set forth in this Agreement. Instead, the Employee shall be paid wages at a flat rate of \$90 per day worked (but in no event less than the applicable

minimum wage) for all days worked prior to receiving such notification (not to exceed five (5) days) and for which no wages have yet been paid as required by this Agreement. If subsequent testing reveals a false positive, the Employee will be entitled to full compensation for the period he worked and reinstatement. The results of all tests will be kept confidential between the Employee, the Employer and the Union.

XIV. TRAINING/DOT RULES

(A) Training – The Trustees of the Teamsters National Pipeline Training Fund will develop a National Pipeline Training Program for Teamsters to train in operating pipeline equipment in areas of high pipeline construction.

(B) DOT Rules – The Trustees of the Teamsters National Pipeline Training Fund will develop a DOT training program to teach Teamsters the necessary skills to comply with DOT driver requirements. Part of this program will be to develop a general pre-dispatch drug and alcohol testing program to be applied to all drivers seeking work under the National Pipe Line Agreement.

(C) Contributions shall be made to the Teamsters National Pipe Line Training Fund and Labor-Management Cooperation Trust in accordance with Schedule "A" and the provisions above. The National Pipe Line Training Fund will establish proficiency training standards to be used in a National Pipeline Training Course, which will include specific Operator Qualification training. Regional training courses also will be set up throughout the country as necessary and will be subject to the proficiency training standards developed by the Fund. A list of Teamsters who have successfully completed the course will be made available to signatory contractors on request. Funds contributed to local training funds for pipeline work covered under the National Pipe Line Agreement should be used by the local funds to provide pipeline and OQ training. Local pipeline training will be monitored by the Teamsters National Pipe Line Training Fund.

XV. HISTORICAL PRECEDENT

Since the inception of the National Pipe Line Agreements, which cover all main line, cross-country pipeline construction, only four (4) Unions have been recognized, and all work relating to such pipeline construction has been performed by these four (4) Unions. They are: The International Brotherhood of Teamsters, The United Association of Journeyman and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, The International Union of Operating Engineers, and the Laborers' International Union of North America. The recognition of only these four (4) Unions on such work is hereby reaffirmed.

XVI. INDIAN PREFERENCE IN EMPLOYMENT

The hiring procedures contained in this Agreement shall not apply in the "territorial jurisdiction" of any Indian Nation which has adopted an Indian Preference in Employment law, provided that those persons covered by the law and seeking covered employment under this

EXHIBIT C

IBT NPLA
2020 – 2023

a. Nothing in this Agreement shall affect the Employer's inherent right to determine the competence and qualifications of applicants for employment or of his employees and his right to reject or discharge accordingly.

b. The selection of applicants for referral to jobs shall be based on a non-discriminatory basis and shall not be based on or in any way affected by union membership, by-laws, regulations, constitutional provisions, or any other aspect or obligation of union membership, policy or requirement.

c. Workmen referred under Article II to the contractor's job who are not able to perform the job to which they are referred because of their own lack of qualifications, or for some other reason which is the workman's own responsibility, shall not be paid show-up time.

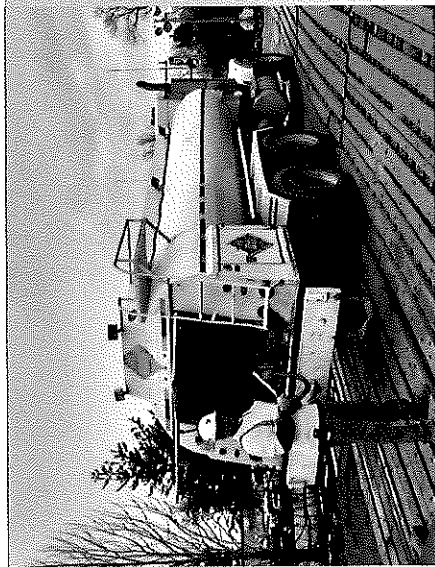
d. Qualified applicants required by Employer at the start of the job must be referred by a local referral office within 48 hours of the receipt of Employer's request; those required by Employer after a job has started must be referred by a local referral office within 24 hours of the receipt of Employer's request. If the local referral office fails to comply with this condition, Employer may secure qualified applicants from any other source. Qualified applicants under this section must have the following:

- (i) Proper federal and state licenses;
- (ii) Proper OQ credentials where necessary;
- (iii) Pipeline or general construction work experience relevant to pipeline work or completion of a certified pipeline training course operated or approved by the Teamsters Pipeline Training Fund. The Teamsters and PLCA also agree they will jointly review the training program on a 6-month basis.
- (iv) Compliance with company Employee and safety policy standards. These policy standards will be provided by each Employer at the pre-job conference.

2. In the event there is no valid exclusive referral procedure established in the area where the particular job is to be done or the proper conditions set out hereinabove have not been met by the referral procedure which has been established, Employer will at the pre-job conference notify Union, as one of the sources from which men are to be recruited, as to the number of men who will be needed in addition to his Regular Employees. Employer shall give preference in employment to men in the area who have had previous pipeline construction experience. It is understood that Employer may also recruit men from other sources, will hire all employees at the job site in a non-discriminatory manner, and shall have the absolute right to determine the competence and qualifications of applicants and employees and to reject and discharge accordingly.

3. Once the original crew has been employed, Employer shall have the right to keep such crew on all the work throughout the territory covered by the particular job for which the pre-job conference was held, regardless of local union jurisdiction.

EXHIBIT D



About Us

Since 1908, the Teamsters labor union has helped millions of workers achieve the American dream. Our success is a testament to those who came before, who united to form a labor movement. These workers fought for the rights and wages that many Americans take for granted today. Unions have provided the solidarity of unions, there would be no weak ends, no pensions, and no health insurance.

The pipeline construction business is a front many competitive and challenging industries including the need to increase the opportunities for union construction, the need to increase the efficiency of the pipeline construction industry, the need to foster harmonious relationships between IBT and its affiliates and the PLCA and its members, the increasingly hazardous nature of the work, the need for specially-trained IBT members, the extent of government regulation, and the necessity to protect public health and safety.

Training Courses

Stringer Truck Driver

The Stringer Truck Driver course is designed to train Class A Commercial Drivers to safely transport pipe using steering trailers in both on-road and off-road situations. Training will include General Safety, Pre-trip Inspections, Stretching and Shooting the Trailer and Rolling Steering Cables. The course is taught in both classroom and field formats. Course length is 24 hours.

Crew Bus

The Crew Bus Driver course will teach drivers to safely operate a crew bus and to prepare them to take the Passenger Endorsement in their home state. The course is taught in both classroom and field formats. Course length is 8 hours.

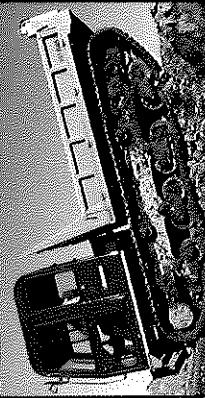


Fork Lift

The Fork Lift course addresses lift truck operation safety in pipeline operations and in accordance with OSHA requirements. The course is taught in both classroom and field formats. Training can include both warehouse, lay down yard and rough terrain situations. Course length is 8 hours.

Fueler

The Fueler course focuses on HAZMAT training and various fuels and compressed gases used in pipeline construction. Course length is 8 hours.



Additional Equipment

There is a host of 'trucks' used on a pipeline construction job. This can include Lowboy, Flatbed or Float, Drop-deck, Dump Truck, (Motorcade) and a host of other different combination vehicles. The driver must have a Class "A" or Class "B" CDL depending on the type of truck used.

Contact Us

To Contact Teamsters National Pipeline Please use the Contact Form on our website.

Visit us on the web at:
www.teamsterspipeline.com

EXHIBIT E

Sent from Yahoo Mail on Android

----- Forwarded Message ----- .

From: "nscuniversity@nsc.org" <nscuniversity@nsc.org>
To: "mike.laborde@yahoo.com" <mike.laborde@yahoo.com>
Cc: "DDCeLearningAdmin@nsc.org" <DDCeLearningAdmin@nsc.org>
Sent: Sat, Jan 25, 2020 at 12:05 PM
Subject: CONGRATULATIONS! You've completed Instructor Certification

Dear Michael,

Congratulations! You have successfully completed Instructor Certification for Professional Truck Driver (PTD); you are on your way to becoming a part of a growing network of NSC driver safety instructors responsible for saving lives!

Please provide this email to your training center immediately. Your NSC Instructor Card will be mailed in the next 2-3 weeks.

As a certified NSC DDC Instructor, you have agreed to fully comply with the DDC Instructor Commitments and as a reminder, you will work with your Training Center to have your first two classes observed by a current NSC Certified Instructor. It is very important you are teaching the course as designed so being observed twice helps your students receive the most effective program possible.

Welcome to the NSC family and thank you for helping to eliminate preventable deaths in our lifetime.

Regards,

The National Safety Council Driver Safety Team



CSOD SYSTEM ID: 188657



June 8, 2016

Michael Borjas
IL Teamsters/Employers Apprenticeship & Trng Fund Affil/Joint Councils 25
990 NE Frontage Rd
Ste 4
Joliet, IL 60431

Customer Number: 699382

Dear Michael Borjas,

We are extremely pleased to announce that your organization has been chosen as a DDC Award recipient for your outstanding training efforts in 2015. The award(s) being presented to your organization are:

Award
Trend Setter

Curriculum
NSC PTD

National Safety Council would like to recognize your training center at the 2016 NSC Congress and Exposition in Anaheim, CA. We invite you to be our guest at the Annual DDC Training Center & Instructor of the Year Awards Celebration to be held on Saturday evening, October 15th, 2016.

To help us prepare for the awards ceremony, please pre-register your organization for the event online at www.nsc.org/2016DDCAwards. We will need your organization's customer number as well as the proper spelling of your organization's name and how it should appear on the award (s). If you are unable to attend, please be sure to go online to pre-register, indicating you cannot attend, and providing shipping information for the award(s). We appreciate your prompt response no later than end of day, June 24, 2016.

In the meantime, if you have any questions, please give our office a call at 800-621-7619 ext. 52041. A formal invitation will be sent in July with final registration instructions.

To help your organization broadcast its success to your community; we have enclosed a press release and an awards definition page. Also enclosed is a FAQ sheet that will help to answer any remaining questions you may have regarding the awards celebration. We congratulate you and look forward to seeing you in Anaheim!

Sincerely,

Subject Matter Expert for NSC Defensive Driving Courses
Enclosure

EXHIBIT F



International Brotherhood of Teamsters Veteran Registration

Name: _____ Phone: _____
Address: _____ Cell: _____
City _____ State _____ Zip _____ E-mail: _____

Are you a veteran? Yes / No What dates did you serve? _____

In which branch of the military did you serve? (Circle one)
Army Marines Navy Coast Guard Air Force

How long have you been a Teamster? _____

What Joint Council are you affiliated with? _____ What is your local? _____

Who is your current employer? _____

Are you currently receiving benefits for service-related disabilities? Yes / No

Do you require assistance to pursue or file a disability claim? Yes / No

Do you want to receive updates on disability benefits or presumptive disease issues? Yes / No

Claims and disability filings will be done through certified claims representatives. All information regarding your filing(s) is confidential between you and a certified claims representative.

Thank you for your service to our country. We hope the resources available are beneficial to you and your family.

Please return your completed form via mail or fax to: Teamsters Building and Construction Trades Division, 25 Louisiana Avenue, NW, Washington, D.C. 20001, or fax (202) 624-8107.

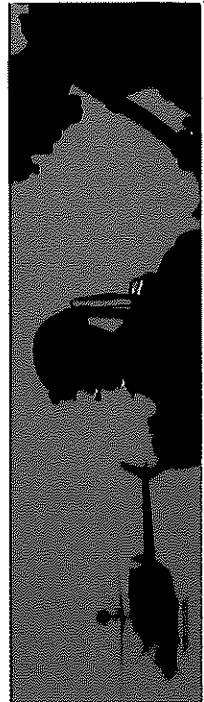


HIRE THE BEST MILITARY

If you're looking for top candidates for your organization, you're in the right place.

Helmets to Hardhats helps to place quality men and women from the Armed Forces into promising building and construction careers.

America's service members have proven themselves to be dedicated, hard working and capable in some of the most difficult and challenging places and situations imaginable. Now, as they transition out of the service, they are looking to put their many skills and experiences to work helping to build America.



These Helmets to Hardhats partners are ready to serve you.

- International Association of Heat and Frost Insulators and Allied Workers
- International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers and Helpers
- International Union of Bricklayers and Allied Craftworkers
- United Brotherhood of Carpenters and Joiners of America
- International Brotherhood of Electrical Workers
- International Union of Elevator Constructors
- Laborers' International Union of North America
- International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers
- International Union of Operating Engineers
- Operative Plasterers' and Cement Masons' International Association of the United States and Canada
- International Union of Painters and Allied Trades
- United Brotherhood of Roofers, Waterproofers and Allied Workers
- Sheet Metal Workers' International Association
- International Brotherhood of Teamsters
- United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada

Contractor Associations

- Finishing Contractors Association
- International Council of Employers of Bricklayers and Allied Craftworkers
- Mechanical Contractors Association of America
- National Association of Construction Boilermakers Employers
- National Electrical Contractors Association
- North American Contractors Association
- Sheet Metal and Air Conditioning Contractors National Association
- The Association of Union Constructors



www.helmetstohardhats.org



CHIRAVE conforms to the applicable provisions of the Civil Rights Act and the Rehabilitation Act.



THEY DEFENDED AMERICA, NOW LET THEM HELP YOU BUILD IT

HIRE MILITARY TALENT FOR
CAREERS IN CONSTRUCTION



HELMETS TO HARDHATS

www.helmetstohardhats.org

866-741-6210

EXHIBIT G

**INTERNATIONAL BROTHERHOOD OF TEAMSTERS
PIPELINE (MAINLINE, ADDENDUM, & INTEGRITY) RATES
PENNSYLVANIA – ZONE 1 (Locals 107 & 384)**

	<u>5/1/20-7/6/20</u>	<u>7/6/20-5/1/21</u>	<u>5/1/21-5/31/21</u>	<u>5/31/21-5/1/22</u>	<u>5/1/22-5/30/22</u>	<u>5/30/22-5/1/23</u>
GROUP 1*	\$30.47	\$30.96	\$30.45	\$31.46	\$30.46	\$31.96
GROUP 2	\$29.71	\$30.20	\$29.69	\$30.70	\$29.70	\$31.20
GROUP 3	\$29.47	\$29.96	\$29.45	\$30.46	\$29.46	\$30.96
H&W	\$9.41	\$9.41	\$9.41	\$9.41	\$9.41	\$9.41
PENSION	\$10.78	\$10.78	\$11.29	\$11.29	\$12.29	\$12.29
PL TRN	\$.25	\$.25	\$.25	\$.25	\$.25	\$.25
LMCT	\$.20	\$.20	\$.20	\$.20	\$.20	\$.20

PREMIUMS (National)

Steward	+\$3.00
Stringing Truck	+\$2.25
Hazmat	+\$1.00
Mechanic	See #15 & #16
Lowboy	+\$2.25
Fuel Truck	+\$2.25
Log/Grapple Truck Rate:	TBD

Per Diem:	\$20	See #18
Boot Pay:	\$10/week	See #5

ZONE 1 Counties (Locals)

Bucks (384), Chester (107), Delaware (107), Montgomery (384) and Philadelphia (107)

INTERNATIONAL BROTHERHOOD OF TEAMSTERS PIPELINE (MAINLINE) RATES

PENNSYLVANIA - ZONE 2 (Locals 229, 317, 401, 429, 771, 773)

	<u>6/5/17-6/3/18</u>	<u>6/4/18-6/3/19</u>	<u>6/3/19-7/6/20</u>	<u>7/6/20-5/31/21</u>	<u>5/31/21-5/30/22</u>	<u>5/30/22-6/4/23</u>
GROUP 1*	\$34.28	\$34.95	\$35.80	\$35.80	\$36.30	\$36.80
GROUP 2	\$33.22	\$33.86	\$34.68	\$34.68	\$35.18	\$35.68
GROUP 3	\$32.92	\$33.55	\$34.36	\$34.36	\$34.86	\$35.36
H&W	\$9.27	\$9.92	\$10.43	\$10.73	\$11.02	\$11.32
PENSION	-----	-----	-----	-----	-----	-----
PL TRN	\$.25	\$.25	\$.25	\$.25	\$.25	\$.25
LMCT	\$.20	\$.20	\$.20	\$.20	\$.20	\$.20

PREMIUMS (National)

Steward	+\$3.00
Stringing Truck	+\$2.25
Hazmat	+\$1.00
Mechanic	See & 15 & #16
Lowboy	+\$2.25
Fuel Truck	+\$2.25
*Log/Grapple Truck Rate:	

Per Diem:	\$20	See #18
Boot Pay:	\$10/week	See #5

ZONE 2 Counties (Locals) Berks (429), Bradford (229), Carbon (401), Lackawanna (229), Lancaster (771), Lehigh (773), Luzerne (401), Monroe (229/773), Northampton (773), Pike (229), Schuylkill (429), Sullivan (401), Susquehanna (229/317), Wayne (229/317), Wyoming (229/401)