Incident Reporting

1. Purpose

The purpose of this policy is to set forth the requirements and procedures for timely reporting and documentation of all incidents. The policy describes how USPL will meet the Code of Conduct requirement, which states, “Always promptly report to local BP management any accident, injury, illness, unsafe / unhealthy condition, incident, spill or release of material to the environment, so that steps can be taken to correct, prevent or control those conditions immediately. Never assume that someone else will report a risk or concern.”

2. Scope

This policy applies to all employees, contractors, customers, visitors, and agency representatives while in the work environment. Incidents include occupational injuries and illnesses, vehicle accidents, Loss of Primary Containment incidents, security incidents, product quality issues, property damage events, regulatory visits, Compliance Notices, Near Misses and Stop Work Interventions.

All incidents and unsafe / unhealthy conditions that occur within USPL while people are performing work for BP are covered under this procedure and are deemed USPL “reportable” regardless of “recordability.” Incidents that are USPL reportable are not necessarily reportable or recordable to federal, state, or local agencies or to BP Group.

Measuring our HSSE performance accurately and consistently is a key component to delivering a safer BP. To assist in achieving this, Refining and Marketing (R&M) Safety & Operational Risk (S&OR) has produced an interactive guide that houses all BP required reporting documentation (Link: Guide to S&OR Reporting).

The following policies are either referenced or are applicable to this policy and should be referenced for specific related requirements and guidance.

- Contractor Management Manual
- Incident Investigation
- HAZWOPER
- Stop Work Procedure

3. Minimum Requirements

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<th>Minimum Requirements</th>
<th>Supporting Documentation</th>
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<tr>
<td>1. All incidents, unsafe / unhealthy conditions, and agency visits shall be reported immediately to the appropriate Supervisor, who shall then continue reporting per the requirements in Appendix I.</td>
<td>Sections 5, 7-18, Appendix I</td>
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<td>2. All incidents, unsafe / unhealthy conditions, and agency visits/actions shall be documented in Traction by a BP employee within three business days, except near misses and stop work interventions shall be recorded in the USPL Near Miss Reporting Tool.</td>
<td>Sections 16, 19</td>
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<td>3. All federal, state, and local reporting or notification requirements shall be followed.</td>
<td>Sections 7-14, 17</td>
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4. Definitions

Many of the terms used in this policy are defined in this section. Additional related terms are defined in the BP Group reporting definitions document (link: FIN-RD 4.4-0001 BP Group HSE Reporting Definitions). HSSE Coordinators will assist with the application of this policy and associated terms.

**Commercial motor vehicle**—Any self-propelled or towed motor vehicle used on a highway in interstate commerce to transport passengers or property when the vehicle—

1. Has a gross vehicle weight rating or gross combination weight rating, or gross vehicle weight or gross combination weight, of 4,536 kg (10,001 pounds) or more, whichever is greater; or
2. Is designed or used to transport more than 8 passengers (including the driver) for compensation; or
3. Is designed or used to transport more than 15 passengers, including the driver, and is not used to transport passengers for compensation; or
4. Is used in transporting material found by the Secretary of Transportation to be hazardous under 49 U.S.C. 5103 and transported in a quantity requiring placarding under regulations prescribed by the Secretary under 49 CFR, subtitle B, chapter I, subchapter C.

**Compliance Notice**—A written communication received by BP (or by the non-BP operator of a joint venture or other such arrangement in which BP participates, that is within BP’s HSSE reporting boundaries) from a local or national government agency, comprising either a Notice of Violation (NOV) or a Compliance Order. A NOV, for these purposes, is a communication that states an alleged HSE or operations non-compliance. A compliance order, for these purposes, is a communication that sets out HSE or operations-related conditions or requirements which must be met in order to continue in operation or to avoid fines or penalties. The NOV or order relates to alleged legal non-compliance or unsatisfactory operation of the site or activity. The metrics are tracked according to the date that the formal notice is received.

**Environmental incident**—Any unplanned material release or agency-reportable event, such as an atmospheric release, leak, spill of product or hazardous material, or deviation from an environmental permit or regulatory compliance requirement.

**ESIS**—A company contracted by BP to provide claims administration. ESIS is also contacted whenever an outside party has a potential claim against BP operations.

**Fraud and misconduct incident**—A fraud and misconduct “Incident” refers to all incidents, allegations and suspicions where there has been, or could be, a breach of the BP Code of Conduct (excluding Operational Health, Safety and Environmental issues), whether internal or external (e.g. perpetrated by customers, suppliers, or any other party), that impacts the Group, regardless of materiality.

**Government Reportables**—An event or incident that BP reports to a government agency on a mandatory basis and that constitutes:

- An exceedance of a permit emission limit/condition (mass or concentration emission limit exceedance) from a government agency (local or national) (Permit/Regulatory/Statutory exceedance), and/or
- A spill/release that is equal to or exceeds any reportable quantities as established by local or national government (loss of containment – reportable quantity exceedance).
If a reportable quantity spill/release also results in a permit exceedance, the incident should be reported as a permit exceedance. Government reportables are based on the date that the incident occurred.

**High Potential (HiPo) incident**—An incident, unsafe/ unhealthy condition or a near miss where the most serious probable outcome is a Major incident. In addition, this includes any Loss of Primary Containment incident with a potential severity classification of Level E or greater as defined in GDP 4.4-001 “Reporting of Incidents.” See Appendix X for an assessment of potential severity requirements.

**Guidance:** In reporting, HiPos are categorized by group standards, severity level and process safety relatedness. A HiPo is to be categorized against a particular group standard where the main root cause of the Incident would be addressed by that standard. Guidance on determining severity levels is provided in the group-defined operating practice ‘Reporting HSSE and Operational Incidents’. For guidance on process safety-relatedness, see the definition Process Safety Event.

A HiPo may not be identified at the time of the Incident and it is only after investigation that the true severity of the most serious probable outcome becomes clear. If, after investigation, an Incident is found to fit these definitions, it should be reported as a HiPo, even if it is outside the nominated reporting timeframe.

**Note:** See Appendix V for a complete description of severity levels.

**Incident**—Any unplanned event or occurrence that affects or has the potential to affect the health, safety or security of:

- people, or
- assets, or
- the environment.

**Guidance:** USPL adheres to BP Group definitions and have added the following to provide clarity and delineate boundaries. For purposes of this policy, incidents are HSSE-related and involve more than minor wear and tear. For other types of events which occur unexpectedly and without design, at management’s discretion the event may be formally investigated and if so, the event, investigation, and recommendations shall be documented in Traction.

**Integrity Management**—The controlled application of hazard evaluation combined with recognized industry standards and engineering, maintenance, and operating practices to reduce uncontrolled releases of hydrocarbons, chemicals, and hazardous materials to the atmosphere, water, or ground and to prevent the failure of equipment and infrastructure in order to avoid serious harm to people, the environment, and BP assets. The decision tree in Appendix III provides guidelines for determining IM-related incidents.

**Loss of Primary Containment (LOPC)**—An unplanned or uncontrolled release of material from Primary Containment.

**Acute Flow** The maximum quantity of material released in any one hour period. (Note: This is only relevant when the material is released over a time period greater than an hour.)

**Acute Release** A sudden release of material that reaches or exceeds the reporting threshold in any one hour period.

**Guidance:** Unplanned or unintentional releases are to be reported as loss of primary containment (LOPC) irrespective of the need for an immediate corrective action. Release from safety devices directly to atmosphere or those which have not operated as designed are to be reported as LOPC (for example liquid releases from a gas flare system). See Group Guide GG 4.4-0002 ‘Reporting of a Loss of Primary Containment (LOPC) Incident’.

**Additionally for USPL, fugitive emissions from equipment in gasoline liquid and vapor service are managed under a regulatory inspection and repair program to minimize emissions during a period of any active leak. This type of managed leak does not prompt internal reporting. The following list of equipment is typically subject to this type of program; valves, pumps, pressure relief devices, sampling connection systems, open-ended valves or lines, and flange or other connector in gasoline liquid transfer or vapor collection systems. Pressure relief devices are monitored to verify they reseat properly after use.**
For internal reporting purposes, this includes an unplanned loss of crude oil, refined hydrocarbon product, additive, hydrocarbon vapor, or other hazardous material from its primary container (e.g., a tank, tote, drum, pipe, hose, truck compartment, etc.). A LOPC shall be reported regardless of the phase of the release (e.g. liquid or gas), whether actively escaping rapidly or leaking steadily, or whether it is contained within secondary containment (e.g., the loading rack containment system, oil-water separator, sump, vault, dike wall, concrete wall, etc.) and subsequently cleaned up.

Releases from routine planned operations are exempted from these reporting requirements when the material is controlled, contained, and recovered using a bucket, drip pan, or similar container. Examples include draining a line during maintenance repairs, disconnecting a barge hose, or a hydro test failure. Also exempted from reporting by the R&M Segment Engineering Technical Authority-Process Safety are very minor weeps such as a couple tablespoons from valve packing.

**Major incident (MI)**—A health, safety, security, or environmental incident in which the actual severity represents a Level A–D or E impact as defined in GDP 4.4-0001 “Reporting of Incidents.”

Guidance: Examples of Level A-D and E impacts include any of the following:

- One or more fatalities
- Ten or more injuries or health effects requiring hospital treatment for more than 24 hours
- Localized or extensive damage to sensitive or non-sensitive environments where remediation to restore the amenity is expected to equal or take longer than any of the time periods defined as Level E or A–D impacts
- Equipment/property damage is equal to or exceeds $1 million
- Significant enforcement action from authorities in a significant market
- Public, investor, or interest group outrage

*Note:* See Appendix V for a complete description of severity levels.

**Marine related incident**—Any incident associated with marine activity, involving marine vessels or units, or involving the operation and equipment of ship shore interface to marine terminals.

**Near miss**—An unplanned occurrence/undesired event, act, or condition that may interfere with or interrupt the orderly progress of work or has the potential to cause personal injury, have a negative environmental impact, or monetary loss through property damage. Additionally, a near miss can be explained as an opportunity to improve environmental, health and safety practice based on an observed act or condition with the potential for more serious consequence.

**Notice of Enforcement (NOE)**—A written notification that an agency is initiating formal enforcement action for violations observed or reported. A fine is normally associated with a NOE. This aligns with BP’s definition of a compliance notice or compliance order.

**Primary Containment**—A tank, vessel, pipe, rail car or equipment intended to serve as the primary container or used for the transfer of the material. Primary containers maybe designed with secondary containment systems to contain and control the release. Secondary containment systems include, but are not limited to, tank dikes, curbing around process equipment, drainage collection systems into segregated oily drain systems, the outer wall of double walled tanks, etc.

**Process Safety Event (PSE)**—An unplanned or uncontrolled loss of primary containment (LOPC) of any material including non-toxic and non-flammable materials (for example steam, hot condensate, nitrogen, compressed Carbon Dioxide (CO₂) or compressed air) from a process, or an undesired event or condition that, under slightly different circumstances, could have resulted in a LOPC of a material.

**Process Safety Management incident - OSHA**—An event that resulted in, or could reasonably have resulted in, a catastrophic release of a highly hazardous chemical in the workplace, e.g. butane.

**Property damage**—Any HSSE-related incident involving loss or damage to BP property, equipment, or materials. This includes third party damage to BP assets unrelated to BP work.

**Quality incident**—An event in which one or more of the following criteria is met:
• An off-specification product, regardless of the dollar volume involved, reaches an internal or external customer.

  Note: Items waived in advance could be characterized as a business decision and do not count as an incident. Product waived after delivery to internal or external customers is more likely characteristic of a quality system problem and is recorded as a quality incident in the Global Fuels Technology Quality Assurance Log.

• A quality-related event that does not reach customers but causes $50,000 or more of loss to the company.

  Note: An example would be a terminal that inadvertently contaminates premium gasoline with regular and downgrades a tank. Even though the terminal’s customers did not receive the off-specification product, the incident is recorded if the cost to remedy the problem is $50,000 or more. If the cost to correct the problem is less than $50,000, it is not to be reported as a quality incident.

• The reputation of the brand is at risk.

  Note: Whenever the media or legal parties are involved in an off-specification product, risk to the reputation of the brand or corporation exists.

• More than $25,000 equipment and property damage.

• At least a minor supply disruption or issue.

**Quality issue**—An event in which one or more of the following criteria are not exceeded:

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<th>Criteria</th>
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<td>• Less than $50,000 business value.</td>
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<td>• Less than $25,000 equipment and property damage.</td>
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<td>• Off-spec material may reach an internal or external customer.</td>
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<td>• Little or no supply issues.</td>
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<td>• No media involvement or impact on the BP brand or corporate image.</td>
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**Security incident**—Any attempted or successful unauthorized access, use, or destruction of company property or interference with company operations and personnel. Examples include assault, threat, burglary, civil unrest, criminal property damage, drug or alcohol abuse or possession, kidnapping, extortion, product contamination threat, robbery, information breach, terrorist or guerrilla activity, and theft.

**Severe vehicle accident (SVA)**—A vehicle accident that involves any of the following:

• Any incident involving a motor vehicle rollover

• Disabling damage requiring any of the Motor Vehicle(s) involved (BP and/or 3rd party) to be recovered from the scene.

• Recordable injury to any single person off site.

• Any off-site spill greater than 1 barrel of product, while in transit, by a company motor vehicle.

SVAs are to be recorded in Traction with a severity level of at least G. See the vehicle rollover definition for guidance on severity level when reporting vehicles rollovers.

The following are **excluded** from SVA reporting:

• Vehicle was operable, yet it was towed due to the driver not being physically or mentally alert to safely operate their motor vehicle.
• Damaged vehicle is repairable at the scene of the incident, yet it is determined that the minor repairs, for example tire or lamp replacement, cannot be completed safely on the roadside. Therefore, the motor vehicle is towed to a safe location to complete the minor repairs.

• It is determined based on investigation and corroborating evidence that damages sustained to a 3rd party motor vehicle rendering it inoperable occurred prior to contacting the company unit.

Supervisor—A generic term used to designate someone’s immediate manager (e.g., Team Leader, Terminal Manager, Project Manager, DOM, etc.).

Traction—The mandatory, electronic, BP-wide incident reporting and action tracking system.

Transportation Security Incident—A security incident at a Maritime Transportation Security Act (MTSA) regulated site resulting in a significant loss of life, environmental damage, transportation system disruption, or economic disruption in a particular area. In this paragraph, the term "economic disruption" does not include a work stoppage or other employee-related action not related to terrorism and resulting from an employee-employer dispute.

Unsafe/ Unhealthy Condition—Any departure from the required or expected performance or condition of equipment (Plant), procedures (Process), or People, which, if not addressed, could result in an incident, or make a consequence of an incident more severe. For example, thinning of pipes due to corrosion, or excessive work hours causing fatigue.

Vehicle accident—A work-related accident involving a motor vehicle that occurs on or off-road resulting in injury, or loss/damage, or harm to the environment, whether this impacts BP and/or its contractor directly, or impacts a third party. This is irrespective of whether the accident was preventable or non-preventable. It excludes all accidents where:

• The BP workforce vehicle is legally parked
• The journey is to or from the driver’s home and normal place of work
• Minor wear and tear is the case (e.g. stone damage to a windshield, minor paintwork damage)
• An incident is the result of vandalism or theft
• A company provided vehicle is being driven on non-work related activities (e.g. private business, leisure).
• Minor damage, e.g. less than $500, caused solely by striking road debris.
• A construction-type vehicle is being used in the construction mode.
• Vehicle undercarriage damage caused by bottoming out on the right-of-way.

Note: Specific incident classification may be subject to further reviews. BP Group definitions and clarifications may change the initial classification.

Vehicle accident (At Fault) —Used to assess responsibility for vehicle accidents. Within USPL this generally means it was determined that the driver did not follow one or more of the 5 Keys of Smith System Driving, that could have prevented the accident, regardless of whether the driver was or was not issued any citations.

Vehicle Rollover— A vehicle accident where the vehicle has flipped onto its side, top and/or rolled 360 degrees via any axis.

Guidance: Vehicle rollovers have the potential risk of resulting in a fatality, and therefore workforce vehicle rollovers should normally be recorded in Traction with a potential severity level of at least E and reported as a HiPo. Further guidance on the reporting of vehicle rollovers is available at the S&OR Driving Safety intranet.

Workforce—Any BP employee or contractor who is engaged in performing work on behalf of USPL. For more specific information, see GDP 4.4-0001-02, HSSE & Operational Incident Reporting Boundaries. (link: HSSE and Operational Incident Reporting Boundaries).
5. **Roles and Responsibilities**

5.1. **All Employees shall:**

   A. Verbally report all incidents, i.e. health, safety & environmental, unsafe / unhealthy conditions, and fraud & misconduct incidents, to their Supervisor immediately.

   *Note:* Employees may contact the USPL Control Manager directly if they do not feel comfortable raising a fraud & misconduct incident with their line manager.

   B. Assist in mitigating the incident consequences as appropriate while maintaining a safe distance.

   C. Assist in completing employee-related incident documentation (written statement of events, entry in Traction, etc).

5.2. **Contractor Job Representative (BP or Contractor Job Rep) shall:**

   A. Report all contractor-related incidents to BP operations management in accordance with Section 18 of this policy.

5.3. **BP Supervisors shall:**

   A. Continue upward and horizontal reporting of all incidents in accordance with the Incident Reporting and Documentation Summary in Appendix I.

   B. Ensure that external parties are notified as necessary (e.g., local emergency response, agencies, contractors, etc.).

   C. Ensure that the incident scene is secured and appropriate actions are initiated.

   D. Ensure completion of documentation associated with an incident (e.g., injury report, OSHA Incident Report, spill report forms, Traction entry, etc.).

   E. Ensure that reports are updated as necessary (e.g., number of days restriction, spill volumes, OSHA 300 Log, etc.).

   F. Post the annual OSHA 300A Summary.

   G. Provide case management under the direction of the Health Services Manager and contact the Workers’ Compensation provider.

   H. Obtain approval of Traction reports from operations manager/department head or their delegates.

   I. Report tank High-High level alarms and the investigation results into Traction. (Link: SOP Accuload and TMS Alarm Management SOP)

   J. Verify integrity management related TMS alarms are reported into Maximo. (Link: SOP Accuload and TMS Alarm Management SOP)

   K. **Report excursions outside the Safe Design Limit (SDL) according to the table in Appendix I:**

   L. Report pressure relief valve defaulters’ (i.e. valves that fail test procedure) investigation results into Traction as Other Events. (Thermal relief valves are excluded.)

   M. Use Appendix VI to determine if a Loss of Primary Containment (LOPC) event is also a Process Safety Event.

   N. Notify Environmental Coordinator of any environmental permit exceedance.

   O. Ensure there are no repercussions or retaliation against a member of the BP workforce for reporting an incident or unsafe / unhealthy condition.

   P. The DOM is responsible for preparing the communication within 48 hours of OSHA recordable injuries to alert entity staff, and raise awareness to prevent similar incidents, assuming there is reasonably sufficient information to do so.
5.4. **DOT Coordinators, Environmental Coordinators, Safety Coordinators, Road Safety Advisor, and Security Manager shall:**

A. Continue upward and lateral verbal reporting of all incidents per Appendix I.

B. Provide immediate advice of other verbal reporting requirements, both internal (e.g., BP Notification Center) and external (e.g., federal, state, and local agencies). In the event of a spill or release, external reporting should follow the detailed requirements spelled out in the Facility Response Plan, OMER Manual, SPCC Plan or permits with additional assistance from the Legal Department as necessary.

C. Make Traction entry in accordance with Regulatory Visits and Compliance Notices below.

D. Assist as necessary to ensure the proper and correct documentation of an incident, including internal documentation (e.g., Traction) and external agency reporting requirements (e.g., OSHA 300 Log, DOT Form 5800.1 for transportation incidents, DOT Form 7000.1 for pipeline incidents, Industrial Discharge reports exceeding permit conditions, breakdown notifications, Title V Permit deviations and/or GD GACT reporting to US EPA etc.) are completed in a timely manner.

5.4.2. **Environmental Coordinators shall:**

A. Verify that the Spill Prevention, Control, and Countermeasure (SPCC) Plan is revised within 60 days following an incident involving discharge of product to navigable waters or adjoining shorelines and as appropriate provide information to the US EPA Regional Administrator in accordance with 40 CFR 112.4(a).

B. Verify that incidents requiring external agency reporting or notification criteria are addressed promptly.

C. Ensure that incidents involving malfunction of equipment in gasoline and gasoline vapor service that occur at terminals, pipeline breakout and pumping stations are properly documented per Environmental Incident section below (i.e. GD GACT documentation).

D. Report non-compliance issues which involve self-reporting with potential regulatory consequences, to the Supervisor responsible for the asset and the HSSE Manager-Performance Unit.

5.4.3. **Safety Coordinators shall:**

A. Assist the Supervisor in completing OSHA 300, 300A, and 301 forms.

B. Audit OSHA 300 logs as identified in assigned Compliance Task Management tasks.

C. Provide advice for any incident involving objects falling from height using the BP ‘Dropped Objects Calculator’ to determine the potential severity level.

5.4.4. **Road Safety Advisor shall:**

A. Maintain the DOT Accident Register

5.5. **HSSE Performance Analysts shall:**

A. Verify and track incident documents and reports.

B. Serve as USPL’s Local Traction System Administrators (LTSA).

5.6. **Health Services Manager shall:**

A. Provide immediate and ongoing advice regarding case management of work-related injuries and illnesses.
5.7. HSSE Managers – Performance Units shall:
   A. Verify the completeness and accuracy of actual and potential severity (see Appendix XI) classifications of incidents and unsafe / unhealthy conditions as required by USPL, Group BP, and all regulatory agencies.
   B. Assist Supervisors in drafting Major Incident Announcements, High Potential Announcements, and Lessons Learned Summaries.
   C. Notify BP Legal of any incident or unsafe / unhealthy condition if litigation or regulatory action is possible.

5.8. HSSE Manager - Safety and Operations shall:
   A. Make the final determination of all unresolved recordability issues in consultation with the appropriate operations manager/department head and HSSE Manager – Performance Units or their delegates.
      Note: This includes making determinations before all information is available in order to meet reporting deadlines, and updating reported information if new information changes the reporting category.
   B. When necessary, request clarification from group S&O or S&O finance on recordability issues.
   C. Verify the correct determination of Process Safety Events.

5.9. Safety & Operations (S&O) Manager shall:
   A. Review and distribute all Major Incident Announcements, High Potential Announcements, and Lessons Learned Summaries.
   B. Consult with the BP regional health director for any workplace fatality believed to be of natural causes or self-inflicted.

5.10. Entity Director shall:
   A. Obtain the agreement of the R&M Deployed S&OR VP of the classification of incident types: actual severity levels A-F, and HiPos.
   B. If there is a disagreement regarding the classification of an incident, this shall be:
      1. Raised with the Group Head Risk, Learning and HSSE, S&OR (or delegate) and CFO S&OR (or delegate).
      2. Addressed in accordance with Appendix X.

5.11. Business Unit Leader
   A. Report Major and HiPo incidents within BP management.
   B. Notify the Chief Operating Officer Fuels Value Chain, the Head of S&OR R&M, and BP Legal of any Major incident through personal conversation.
   C. Make all reasonable attempts to establish contact with injured parties in order to express concern, offer support, and gain understanding of the incident.
   D. Accountable to issue a communication within 48 hours of OSHA recordable injuries to alert entity staff, and raise awareness to prevent similar incidents, assuming there is reasonably sufficient information to do so.
   E. Within the initial 48 hour period of OSHA recordable injuries, the entity leader should arrange for distribution of the entity notification to the NA Fuels LT.
5.12. **USPL Marine Authority shall:**
   A. Consult with the Segment Marine Authority for all Major and HiPo marine incidents.

5.13. **Traction Approver shall:**
   A. Reviews Traction reports and evidence of action items completed for accuracy, completeness, and validity before approving.
   B. Considers requests for extensions on action item due dates using the criteria in section 20.3.

6. **All Incident Scenes**

   A. To the extent practical, the following actions shall be taken immediately after the incident has occurred:
      1. Follow local plans for incident response.
      2. Secure and barricade the incident scene as appropriate. Any relevant debris outside of the barricaded area should also be secured.
      3. Photograph, videotape, and/or sketch the incident scene.
      4. Obtain a written, on-the-spot account of the incident from each eyewitness. The Response Log (ICS 214) may be used for this purpose.
      5. Collect or make copies of the following:
         a) Log book entries, hard copies of data and trend plots stored in the computer, printouts of alarm summaries, written orders, standard operating instructions, standard maintenance instructions, training guides, and any similar information that may pertain to the incident
         b) Any procedures that were being used or could have been used
         c) Relevant permits and work orders
         d) Weather conditions (e.g., wind speed and direction, humidity, temperature, etc.)
         e) Comments about the physical condition of the incident site (housekeeping or other)
      6. Survey the area and record the following information, if relevant:
         a) Position of control valves, manual valves, and relief valves; state of control valves (manual, auto, bypassed, or hand-jacked)
         b) Activated trips and alarms
         c) Inoperable equipment, especially alarms
         d) Names of all personnel who were in the area, their position or function, and their company
   
   B. For any type of incident where a 3rd party (member of the public) has been injured or sustained property damage, a notification shall be made to ESIS, our 3rd party claims administrator. A completed accident report (e.g., using Traction) shall be faxed to ESIS.
      1. East of Rockies, fax the report to ESIS at: 800-231-8506; or phone: 913-491-2269.
   
   C. For any type of incident involving objects falling from height, the BP ‘Dropped Objects Calculator’ shall be used to inform the assessment of potential severity. The calculator is located in the Incident Reporting folder, under HSSE Policies in DRM.
7. Occupational Injuries and Illnesses

7.1. General Requirements

A. Employees shall verbally report all alleged work-related injuries and illnesses immediately to their supervisor, no matter how minor they may appear and regardless of when or where the symptoms first appear. Additionally, employees should report personal injuries that may affect job performance to their supervisor so the supervisor can take proactive steps to ensure the work environment doesn’t aggravate the injury.

B. Each contractor employee (including subcontractors’ employees) shall immediately notify BP site management and the contractor supervisor of any injury or illness sustained while performing work in the BP work environment.

C. The supervisor shall then make the appropriate notifications in accordance with the Incident Reporting and Documentation Summary (Appendix I) if the alleged condition was potentially caused or aggravated by the work environment.

D. The supervisor is accountable for completing a Traction report for any injury or illness, including first aid cases, with witness and employee statements attached.

E. Any fatality associated with BP operations shall be reported to the Business Unit Leader within one hour. The HSSE Manager will advise further reporting, depending on circumstances as outlined in the Decision Flow Chart for Fatality Reporting Categories posted in the Incident Reporting folder in DRM. Link: Decision Flow Chart for Fatality Reporting Categories

7.2. OSHA Requirements

A. Injuries and illnesses that meet OSHA’s guidelines for recordability shall be recorded on OSHA’s Form 300, “Log of Work-Related Injuries and Illnesses,” and Form 301, “Injuries and Illnesses Incident Report.” Recordable injuries shall be added to the OSHA 300 log within seven days after the Supervisor has learned about an incident.

   1. If the work-relatedness of an injury or illness is questionable, the incident shall be recorded on the OSHA 300 log within seven days, but may later be lined out if an investigation of the injury or illness has determined it to be not work-related.

   2. The OSHA forms 300 (log) and 301 (report) shall be kept up to date. The facility Supervisor is responsible for this requirement for all employees considered based at the facility.

   Note: The following guidance may be used to meet the requirements of paragraph A:

   a) In January, access the OSHA 300 Log Template in the Domain site’s OSHA folder in DRM.

   b) Print the OSHA Form 300 worksheet, OSHA Form 300A worksheet, and OSHA Form 301 worksheet. Enter the Year, Establishment name, City, and State on the OSHA Form 300.

   c) Keep the paper forms in a local file for the year, and update the OSHA Form 300 for any OSHA recordable injuries within seven days. You will also need to fill in the OSHA 301 worksheet for each injury.

   d) In January of the following year, finish completing the OSHA Form 300 by adding up the columns and writing the total numbers on the Page totals row. Complete the OSHA Form 300A worksheet including the number of cases, days and types, and the establishment and employment information, then the signature information. See paragraph C below for OSHA Form 300A posting requirements.

   e) The completed OSHA 300, 300A, and all supporting 301 Forms must be uploaded to the Domain site’s OSHA folder in DRM. The choices are to scan the OSHA forms and upload them as one appropriately named document, e.g. OSHA Log 2014. Alternately, the OSHA 300 Log Template can be downloaded from DRM, completed as a computer
worksheet (some fields autopopulate), then the workbook can be printed, signed, scanned and uploaded. Safety Coordinators and Document Coordinators can assist.

Note: For OSHA reporting purposes, all employees shall be associated with a single facility. Check with your Safety Coordinator for recording injuries to employees visiting the site. Contractors are not reported on BP’s OSHA logs but are reported through Traction.

B. The Supervisor shall notify the nearest office of OSHA’s Area Director within 8 hours for all employee work-related fatalities, and within 24 hours for all employee work-related hospitalizations, amputations, or loss of an eye.

1. A verbal report shall be made to the OSHA office nearest the incident or to OSHA’s toll-free central telephone number at 1-800-321-OSHA (1-800-321-6742).

2. If the incident occurred in a state with an OSHA-approved state plan (AK, AZ, CA, IN, IA, KY, MD, MI, MN, NV, NJ, NM, NY, NC, OR, SC, TN, UT, VA, WA, WY), contact the local OSHA administrator.

3. The information requested by OSHA includes: establishment name, location and time of the work-related incident, type of reportable event, number and names of employees who suffered the event, contact person and his or her phone number, and a brief description of the incident.

C. The Supervisor is responsible for ensuring that the OSHA 300A summary is posted no later than February 1 of the year following the year covered by the records; the posting shall be kept in place until April 30.

D. These OSHA forms shall be maintained for five years.

7.3. NA Fuels Recordable Injury Response Protocol

A. Within 48 hours of the injury being reported (including holidays and weekends), the BUL or designate, should make all reasonable attempts to establish contact with the injured party in order to express concern, offer support, and gain understanding of the incident. In the event of an injury to a contractor, such contact should be made in conjunction with the contractor’s senior management.

B. The BUL or designate should visit the location where the injury occurred as soon as reasonably possible in order to gain a first-hand understanding of the incident.

C. A USPL communication should be issued within the 48 hour period to alert entity staff, and raise awareness to prevent similar incidents, assuming there is reasonably sufficient information to do so. And when the facts are reasonably known, the communication should include a preliminary assessment of the barriers that should be in place to prevent a similar event from occurring.

D. Within the initial 48 hour period, the BUL should arrange for distribution of the entity notification to the NA Fuels LT.

8. Case Management

8.1. General Requirements

A. Once an alleged injury or illness incident occurs (regardless of how minor), the USPL Health Services Manager shall be contacted per Appendix I to provide guidance and assistance.

8.2. Reporting Employee Workers’ Compensation Claims

ESIS continues to handle Workers’ Compensation claims for USPL employees, but uses an intake vendor called First Notice of Loss (FNOL).

A. If a BP employee experiences an alleged work-related injury or illness, the Supervisor shall report the incident to ESIS by one of the following three methods (all methods require the same information).
1. **Online**
   a) This option is a secured website that requires pre-registration. Supervisors interested in online reporting will need to request access by providing your name, telephone number, and email address to BP’s Workers’ Compensation Manager, Carol Vajda (carol.vajda@bp.com). This will take a few days to set up so it must be done in advance.

2. **Email**
   a) The Supervisor may email a completed intake form to First Notice.
   b) Complete the “ESIS Workers’ Compensation Claim In-Take Form” located in DRM and email it to First Notice at the address on the form (esis_fnol@firstnotice.com).

   Link to form for East of Rockies, Gulf of Mexico, and staff groups: [Workers’ Compensation In-Take form](#)

3. **Telephone**
   a) The Supervisor may call First Notice and report the required information by answering the questions from the intake representative.
   b) For telephone reporting, call First Notice at 888-499-5522.
   c) Please be prepared to provide the following information:

   | BP Facility: | Specific Location: |
   | Employee’s Name: | |
   | Employee’s Address/Phone Number: | |
   | Date of Birth: | Date of Hire: |
   | Social Security Number: | Occupation: |
   | Weekly Hours: | Wages: |
   | Date of Injury: | Time of Injury: |
   | Date of Knowledge: | Scheduled Shift on Date of Injury: |
   | Lost Time: Yes or No | Last Day Worked: |
   | Return to Work: Yes or No | Full Wages Paid on Date of Injury: Yes or No |
   | | Martial Status: Married or Single |
   | How Did the Accident Occur: | Where Did the Accident Occur: |
   | Body Parts Affected: | Wages Continued: Yes or No |
   | Number of Days Worked per Week: | Full-Time or Part-Time Employee |
   | Did the Employee Seek Medical Treatment: Yes or No. If Yes | Name, Address, Telephone Number of Treating Doctor: |
   | Do You Question the Validity of this Claim? Yes or No. Why? |

4. In all cases, the location code will need to be provided. It is L0585 / 00670

8.3. **Supervisor’s Role for Employee Case Management**

   A. The employee’s Supervisor shall obtain a clear understanding of what occurred.
   B. The Supervisor (or designee) shall:
      1. Unless immediate medical attention is necessary, contact the Health Services Manager after learning of the incident but no longer than one hour afterward. The Health Services Manager
will provide guidance to the Supervisor on medical issues including the need to be evaluated by a medical professional.

2. Provide for appropriate medical attention for any injured or ill employee.
   a) Ask the employee to go to a company-approved occupational health clinic first unless the injury warrants direct referral to an emergency room.

3. Accompany the employee to the hospital or occupational clinic to:
   a) Ensure a complete understanding of the treatment and any employee restrictions. This will aid in determining OSHA recordability and enable the Supervisor to assist the employee in adhering to any restrictions.
   b) Explain the types of restricted work or modified duty that may be available if the employee is deemed fit to return to work with restrictions.

4. Consult with the employee and medical provider on the timing and conditions for a return to work, as appropriate. Obtain clarification for vague recommendations such as “employee should stay home from work” or “only work modified duty.”

5. Maintain contact with the Health Services Manager concerning the employee’s rehabilitation until normal duties are resumed.

6. If the injury requires four or more consecutive calendar days away from work, complete the Family Medical Leave of Absence (FMLA) request in BPpeople portal and send a separate email to the Health Services Manager and our third party medical vendor.

8.4. Contract Employee Case Management

A. Each contractor employee (including subcontractors’ employees) shall immediately notify BP site management and the contractor supervisor of any injury or illness sustained while performing work in the BP work environment.

B. Contractor employees are expected to follow their own medical treatment policies and plans in the event of an injury or illness.

C. BP site management shall properly record the injury or illness internally in Traction and report upward within line, HSSE, and EPIC organizations as appropriate.

D. Contractor companies are expected to provide their own case management for their employees’ medical situation and return-to-work status.

9. Vehicle Accidents Involving BP Employees

9.1. All Vehicles

A. A BP employee who is involved in a vehicle accident while operating a company-owned, leased, or rented vehicle, or while operating a personal vehicle used for company business, shall report the accident immediately to his or her Supervisor.

B. The Supervisor shall report the incident to management in accordance with the Incident Reporting and Documentation Summary (Appendix I).

C. The Supervisor is accountable for the completion of a Traction report.

D. If an injury or a spill or release has occurred as a result of the vehicle accident, then the Injury / Illness and Material Release sections of the Traction report shall also be completed.

E. If applicable, the BP employee shall obtain personal and insurance information from the other motorist involved in the accident and, if applicable, the names and addresses of any witnesses, copies of police reports, and any other related information including photographs of the accident scene. Local police shall also be contacted following a vehicle incident occurring off of BP property.
F. If the state has notification requirements for vehicle accidents exceeding a certain dollar value in
damage or resulting in personal injury, the Supervisor and the employee involved in the accident
shall complete and submit any applicable forms.

G. Damage to any vehicle leased from Wheels shall be reported to Wheels at 866-482-GOBP (866-
482-4627) within 24 hours. Wheels will notify ESIS for any incidents involving third parties.

H. A completed accident report (e.g., using Traction) shall be faxed to ESIS for any incident involving
third-party damage.

1. East of Rockies, fax the report to ESIS at 800-231-8506; or phone: 913-491-2269).

2. Northwest, fax the report to the ESIS office in Woodland Hills, CA (fax: 818-593-4470; phone in

I. All company light vehicles should be equipped with accident reporting instructions from Wheels.

9.2. Commercial Motor Vehicles Only

A. Drivers of a commercial motor vehicle involved in a DOT accident shall undergo drug and alcohol
testing within two hours of the accident. A DOT accident is defined as follows:

1. It results in a fatality; or

2. The commercial vehicle driver receives a citation for a moving violation; and
   a) A person is injured in the accident and the injuries require immediate medical treatment
      away from the accident scene; or
   b) One or more vehicles, including the commercial vehicle, incur disabling damage because
      of the accident and must be towed from the accident scene.

B. If a required test is not administered within the prescribed time period, the Supervisor shall prepare
and maintain on file a record stating the reason the test was not promptly administered.

C. The Road Safety Advisor shall be notified for all accidents involving commercial motor vehicles and
is responsible for ensuring that the DOT Accident Register is accurately maintained. All DOT vehicle
accidents that occur on a highway in interstate or intrastate commerce and meet any of the
following criteria shall be recorded on the DOT Accident Register:

1. A fatality
   Note: The DOT defines a fatality as any injury resulting in the death of a person at the time of
   the motor vehicle accident or within 30 days of the accident.

2. Bodily injury to a person who, as a result of their injury, immediately receives medical treatment
   away from the scene of the accident

3. Disabling damage to one or more motor vehicles that requires the vehicle(s) to be transported
   away from the scene of the accident by a tow truck or another motor vehicle.

D. See Appendix VIII for further instructions if any of the following occurs involving a BP employee
during loading, transportation, unloading, or temporary storage in which as a direct result of
hazardous materials:

1. A person is killed;

2. A person receives an injury requiring admittance to a hospital;

3. The general public is evacuated for one hour or more;

4. A major transportation artery or facility is closed or shut down for one hour or more;

5. The operational flight pattern or routine of an aircraft is altered; or

6. A situation exists of such a nature (e.g., a continuing danger to life exists at the scene of the
incident) that, in the judgment of the carrier, it should be reported to NRC even though it does
not meet the criteria listed above.
10. Environmental Incidents

10.1. General

A. All loss of primary containment (LOPC) events shall be reported in accordance with the requirements summarized in the Incident Reporting and Documentation Summary (Appendix I); this includes entering the incident into Traction, and making the notifications and obtaining the documentation required by the OMER manual or Facility Response Plans.

B. Federal, state, and local external reporting requirements exist for hazardous materials (including hazardous wastes) in various reportable quantities. The Environmental Coordinator/DOT Coordinator shall be consulted regarding environmental release reporting requirements in accordance with Appendix I.

C. The Supervisor responsible for the LOPC event shall use Appendix VII to determine the minimum potential severity of any LOPC. Appendix V shall then be used to determine if the potential severity classification should be higher for recording in Traction based on the actual circumstances of the incident.

D. Incidents involving equipment in gasoline service or gasoline vapor service, that occur at terminals, as well as pipeline breakout and pumping stations, shall be documented in a manner to identify malfunctions of process equipment, air pollution control equipment and monitoring equipment that cause or may have caused an applicable emission limit to be exceeded. This documentation shall include the occurrence and duration of the incident, a brief description of the incident and any corrective actions taken to minimize emissions and to return equipment to normal operations. These malfunction events will be reported to US EPA and local agencies on a semi-annual basis per 40 CFR 63. Malfunction means: Any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emissions limitations in an applicable regulatory standard to be exceeded.

E. For releases from DOT jurisdictional equipment, the Operations, Maintenance, and Emergency Response (OMER) book contains additional spill and release reporting and response information that may be required. See Section 12, “Department of Transportation (DOT) Pipeline Reporting Requirements.”

F. Uncontrolled releases of product on top of an external floating roof will be reported as loss of primary containment (LOPC) if the amount is ≥ 5 gallons crude oil, or ≥ 42 gallons of finished products. However, any fugitive emissions that may be associated with this initial LOPC event that are generated from excess rim seal or deck fitting gaps of the floating roof do not need to be included in the estimate of LOPC.

Note: External floating roof tanks that have had a dome installed are considered to be internal floating roof tanks.

G. The BP Notification Center shall be notified within one hour of LOPC events meeting the reporting criteria in Appendix II (“BP Notification Center Call Requirements”).

Note: Additional site-specific Facility Response Plan information is posted on the Emergency Response Planning System via the following link: [Emergency Response Planning System](#).

10.2. Process Safety Events

A. In most instances, the determination of whether or not Loss of Primary Containment (LOPC) events are Process Safety Events and recorded in Traction as such involves the following considerations:
1. Type of material released and its Material Hazard Classification;
2. Threshold quantity released and its location (outdoors vs. indoors);
3. Level of severity as described in Traction;
4. Material released is greater than threshold quantities listed in Table 1 or Table 2 in any 1-hour period. (See Appendix V for tables).

Note: See Appendix VI for the decision tree methodology for determining if a LOPC should be recorded as a Process Safety Event.

Note: A pressure relief device that is released to a control device that functions as intended is NOT a Loss of Primary Containment but is entered as a Process Safety Event.

B. The HSSE Manager-Safety & Operations shall verify the correct determination of Process Safety Events.

10.3. Process Safety Management Incidents - OSHA

A. All process safety management incidents which result in, or could reasonably have resulted in a catastrophic release of a highly hazardous chemical in the workplace shall be reported as soon as practical following the reporting requirements in this policy, clearly identifying it as a process safety management incident.

11. Regulatory Visits and Compliance Notices

11.1. Regulatory Visits

A. For all agency visits or inspections (including an off-site vehicle inspection by a regulatory agency), the Supervisor and appropriate Environmental Coordinator, Safety Coordinator, Road Safety Advisor, or Security Manager shall be notified of the visit or inspection and its outcome as soon as practical in accordance with Appendix I.

B. The appropriate HSSE Coordinator shall enter the visit into Traction under “Audit” within three business days.

1. In the Audit Name field, enter the name of the event as “Agency Visit” + “from agency name” + “on agency visit date.”
2. In the Audit Type field select the reason for the agency visit

C. The agencies and their associated branch, area, or discipline include but are not limited to:

1. Environmental Protection Agency (EPA) and state agencies—Air, water, waste, tanks, SPCC and emergency response, CERCLA, RCRA, TSCA
2. Department of Transportation (DOT) and state agencies—Pipeline, road, rail and emergency response
4. Occupational Safety and Health Administration (OSHA)—Safety and health
5. U.S. Coast Guard (USCG)—Marine Operations, security, and emergency response
6. Army Corps of Engineers
7. Internal Revenue Service (IRS)—Taxed product (usually dyed)
8. Department of Commerce (DOC)—Weights and measures
9. Department of Energy (DOE)
10. Nuclear Regulatory Commission (NRC)
11. Federal Aviation Administration (FAA)—air shipments of hazardous materials
12. State fire marshal and local fire departments—Pipelines, hazardous material storage, safety, fire protection, underground storage tanks
13. State, county, and local law enforcement—Safety, security, protection, environmental and fuel quality

11.2. Compliance Notice - Regulatory Notices of Violations (NOVs), Orders, and Penalties

A. Regulatory Notices of Violations, orders, and penalties include any official document from a regulatory agency that requires action to be taken by BP within a specified time frame. These include but are not limited to:

1. Notice of Violation or Notice of Non-Compliance, Notice of Enforcement
2. Notice of Excess Emission
3. Notice of Deficiency
4. Notice of Potential Violation or Notice of Alleged Violation
5. Notice of Non Reporting
6. Corrective Action Order
7. Improvement Notice, Notice to Comply, Notices and Warning Letters
8. Cease and Desist Orders
9. Administrative Consent Decrees
10. Agency Partnership Agreements
11. Citations and Fines (e.g., traffic, scale, OSHA, etc.)
12. Delinquent Fee Notices
13. Agency-initiated communications to BP regarding potential noncompliance issues

B. Supervisors, upon receiving an NOV, order, or penalty, shall report it to the appropriate DOT Coordinator, Environmental Coordinator, Safety Coordinator, Road Safety Advisor, or Security Manager immediately. Supervisors shall then report and their next-level Supervisor within 8 hours. The Coordinator or Advisor, in consultation with their HSSE Manager, will work with the appropriate Supervisor and Legal Department to address the issue within the time frame specified by the agency.

C. The applicable DOT Coordinator, Environmental Coordinator, Safety Coordinator, or Road Safety Advisor shall enter the NOV, order, or penalty into Traction under “Other Events,” and notify the HSSE Manager-S&O and DOT Specialist by email, within three business days.

1. In the Event Name field, enter the name of the event as “NOV + “from agency name” + “visit on agency visit date,” if applicable or “other” if the NOV is not related to an agency visit. In order to tie NOVs related to agency visits to their respective visit, the first part of the event description should read “Agency Visit YEAR-Event-XXXXXXX.”

2. In the event description identify corrective actions taken to mitigate or correct the compliance deviation, assign a priority, identify a responsible party for each action and a corresponding target date for completing the action.

3. If the NOV, order or penalty was a result of self-reporting a compliance deviation include that information in the event description.

4. Attach a scanned copy of the original NOV, order or penalty letter into the report.
D. The HSSE Manager – Performance Unit shall confirm that NOVs, immediately upon receipt, are entered into the USPL Notice of Violation SharePoint site via the following link: Notice of Violation.

E. The HSSE Manager – Performance Unit shall complete the “Compliance Notice to USPL” form for all NOEs (which are Orange Book reportable) and email it to the HSSE Manager-S&O within 10 days. The HSSE Manager-S&O shall review and forward the completed form to the VP Compliance – US Refining, USPL BUL, USPL S&OR Manager, and the appropriate Performance Unit Leader and HSSE Manager-PU. The form is located in the Incident Reporting folder in DRM. (Link: Compliance Notice to USPL form) Attach the completed “Compliance Notice to USPL” form to the USPL Notice of Violation SharePoint site via the following link: Notice of Violation.

F. After the NOV, order or penalty is resolved, the applicable DOT Coordinator, Environmental Coordinator, Safety Coordinator, or Road Safety Advisor shall attach a scanned copy of any final response letter or communication submitted to the agency to the Traction report. This document should summarize specific corrective actions taken to prevent likely reoccurrence of the compliance deviation.

G. Discovery of a non-compliance issues which involve self-reporting with potential regulatory consequences, shall be reported to the Supervisor responsible for the asset and the HSSE Manager-Performance Unit.

12. Department of Transportation (DOT) Pipeline Reporting Requirements

The Department of Transportation regulates interstate pipelines including DOT jurisdictional equipment located in terminals, through Title 49, parts 190–199, under the Pipeline and Hazardous Materials Safety Administration (PHMSA). Compliance with these regulations is mandatory. PHMSA has outlined strict reporting requirements for spills and incidents, dictated by the volume, injuries caused, damage to property, and damage to the environment.

12.1. DOT Reporting

A. A spill or other incident with any of the following outcomes requires telephonic notice to the National Response Center (800-424-8802) at the earliest practicable time, but no later than two hours following notification or discovery of the incident, regardless of the amount of available information:

1. Oil Release
   a) An explosion or unintended fire occurs.
   b) A volume of ≥ 5 gallons is released (5 bbls if result of maintenance work).
   c) Damage to property, cost of clean-up, and product loss value exceed $50,000.
   d) A death or injury requiring hospitalization occurs.
   e) The incident is deemed significant enough to be reported to the NRC even though none of the above outcomes occurred.
   f) Any body of water is visibly polluted by a BP release.

2. Gas Incident
   a) An explosion or unintended fire occurs.
   b) Damage to property, cost of repair, and product loss value exceed $50,000.
   c) A death or injury requiring hospitalization occurs.
   d) The incident is deemed significant enough to be reported to the NRC even though none of the above outcomes occurred.
B. When making a telephonic notification, the caller should be prepared to provide the following information:
   1. Name and address of the pipeline operator
   2. Name and phone number of the reporter
   3. Location and time of failure
   4. Injuries or fatalities
   5. Any other significant facts

C. The employee reporting the spill shall record the NRC phone number and the name of the NRC person taking the report. The employee shall notify the DOT Compliance Coordinator anytime the NRC is notified.

D. In addition to a telephonic notification, the DOT Compliance Coordinators shall submit a written report within 30 calendar days of discovery. Form 7000-1 shall be used for an oil release, Form 7100.1 for a gas incident.

E. As soon as possible after a pipeline accident, the Response Manager shall ensure that a documented accident analysis is completed using Form 195.402(c)(5), "Post-Accident Analysis and Response Procedure Review Checklist."

F. Specific procedures regarding incident reporting may be found in Book 1 of Operations, Management, and Emergency Response (OMER) via the following link: OMER.

G. Drug and alcohol testing shall be conducted within 8 hours (for alcohol) or 32 hours (for drugs) of a DOT pipeline accident that results in the release of product, gas, or LNG and
   1. Fire or explosion,
   2. Loss of 50 barrels or more of hazardous liquid or carbon dioxide,
   3. Escape to atmosphere of more than 5 barrels of highly volatile liquids,
   4. Death of any person,
   5. Bodily harm to any person,
   6. Estimated property damage (including cost of clean-up and recovery, value of lost product, and damage to property) that exceeds $50,000,
   7. An emergency shutdown of an LNG facility, or
   8. An event that is significant in the judgment of the operator.

12.2. USPL Internal Reporting

A. If any of the following pipeline anomalies are discovered during any activity other than Pipeline Assessment Activities (In-Line Inspection (ILI) inspection and repair, Stress Corrosion Cracking exploratory digs, Direct Assessment investigations, Guided Wave investigations) it should be reported at the earliest practical time (prior to covering the anomaly with coating or the pipe with fill) to the Control Center and an ILI Specialist for evaluation:
   1. Any pipeline dents, gouges, grooves or crack-like features.
   2. Any scratches to the pipe which requires review with an ILI Specialist (as defined in section 7.2 and 7.3 of STP 32-199, ILI Field Inspection Protocol).
   3. Any corrosion or metal loss 50% or greater in depth.
13. Property Damage Incidents

A. All incidents resulting in property damage shall be reported in accordance with the requirements set forth in Appendix I.

B. Incidents that cause vehicle damage but do not meet the definition of a vehicle accident (e.g., vehicles that are legally parked or vandalized) are reported as Property Damage incidents in Traction.

Note: Local police may need to be notified, but the USPL vendor (Wheels at 866-482-GOBP, or 866-482-4627) shall be notified.

14. Security and Fraud Incidents

Accurate and timely reporting of security and fraud incidents is an essential element of BP’s Code of Conduct. Such reporting ensures that appropriate management and staff are apprised of losses and incidents; provides a database from which trends can be identified, appropriate responses developed, and resources allocated; and provides a permanent written record of the event or loss in case of subsequent litigation.

14.1. Security

A. All security incidents shall be reported in accordance with the requirements set forth in Appendix I. Note: The USPL Security Manual contains more information about our Security Program and can be found online. From the USPL home page, go to the Process tab, select HSSE - Safety & Operations on the left, then select Security, then USPL Security Manual. Or click the following link: USPL Security Manual.

B. The following protocol shall be used for reporting security incidents that meet the criteria for a Major incident or HiPo:

1. Incidents that are public knowledge (such as overt attack against a location or aircraft, siege with BP hostages, bomb attack, etc.) shall be reported according to the requirements in Appendix I.

2. Incidents that may not be public knowledge (kidnapping, extortion, product contamination threat, or covert attack against a BP employee or facility) should be communicated privately and securely, if possible, immediately by the Business Unit Leader to the R&M executive line management, regional security advisor, and Group Head of Risk, Learning and HSSE S&OR.

C. A Traction report shall be completed for any security incident within three days of its occurrence.

14.2. Fraud and Misconduct

A. Reporting of fraud and misconduct incidents is the responsibility of all employees. Any employee who has any information relating to incidents either committed or to be committed must report them. Failure to report such incidents in accordance with this policy is inconsistent with BP’s commitment to integrity and may be considered a breach of the Code of Conduct.

B. There are two methods of reporting fraud and misconduct concerns, internal reporting lines and OpenTalk.

1. Internal reporting lines

   a) Contact your supervisor, or contact USPL’s Fraud and Misconduct Responsible Person, i.e. USPL Control Manager, Finance.

2. Open Talk

   a) Call OpenTalk at 800-225-6141. After taking your concern, OpenTalk will report it to USPL’s Fraud and Misconduct Responsible Person for further investigation.
C. Refer to the Legal, Compliance & Ethics tab on the USPL homepage for instructions on reporting legal and ethical concerns.

15. Quality Incidents

15.1. Quality

A. In the event of any Fuel Product Quality incident or a probable Quality incident or issue, the Supervisor involved shall promptly notify the:

1. Global Fuels Technology Quality and Technical Service (Q&TS) team through the Q&TS Daytime Hotline Number at 800-841-5255, or the 24-hour phone at 800-237-9436, or directly contact the Global Fuels Technology Regional Technical Service Engineer;

2. Operations & Maintenance Manager or equivalent; and

3. Control Center (if the incident is a result of a controller error or SCADA problem).

Note: The Q&TS number is attended by a Q&TS engineer 24 hours a day. Email does not constitute prompt notification.

B. Global Fuels Technology is the custodian of the Quality Incident Response Plan. The current version can be accessed through the GFT Controlled Documents SharePoint site via the following links:

1. Link: East of Rockies Quality Emergency Response Process

2. Link: Northwest Quality Emergency Response Plan

C. Quality incidents and issues identified and reported by USPL shall be entered into Traction as an Incident Report under “Quality.” The Quality Coordinator shall be consulted to determine which incidents are attributable to USPL, who inputs the report, and the severity level.

16. Rail Incidents

Per the North America Rail Accountability Agreement, any incident within the property line of a USPL site is the responsibility of the site to report, manage, and investigate. Once the rail car crosses the property line and is constructively placed in the transportation system, North America Rail is responsible for managing and investigating the incident.

A. North America Rail requests that all rail incidents, near misses and non-conformances be reported to the BP Notification Center (800-321-8642 or 630-961-6200). The Notification Center will notify the North America Rail HSSE Team who will initiate their support process.

17. Near Miss Incidents and Stop Work Interventions

A near miss or stop work intervention presents an opportunity to improve environmental, health, and safety practices based on a condition or incident with the potential for more serious consequences. A near miss event and stop work intervention reporting, analysis, and documentation system is a valuable accident prevention strategy.

A. Employees are encouraged to report all near misses and stop work events to their Supervisor as soon as practical following the event.

B. Near Misses shall be reported through the Near Miss & Stop Work Reporting tool (via the following link: Near Miss & Stop Work Reporting Tool) rather than Traction.
C. Stop work interventions shall be reported through the Near Miss & Stop Work Reporting tool link: Near Miss & Stop Work Reporting Tool. The “Stop Work” radio button shall be selected when entering the stop work information.

D. Near misses and stop work interventions can be formally investigated at the discretion of USPL management or the Lessons Learned Review Board. For documentation purposes, these near misses that are formally investigated shall be recorded in both the Near Miss Reporting Tool and Traction in the “Other Events” category. The investigation report shall be attached to the Traction report and all action items assigned in Traction.

E. Supervisors should use their best judgment in evaluating near misses to determine which ones may have more potential for learning from and should therefore be investigated. Consideration should be given to near misses related to:
   1. Control of Work, e.g. work initiated before a permit is completed, not all mitigations implemented.
   2. LOTO, e.g. an incorrect LOTO procedure used, deviation from an approved LOTO procedure.
   3. Safety devices, e.g. thermal relief valve found in the wrong position, pressure relief device operating.
   4. Other, e.g. equipment placed in service prior to eMOC Authorization.

18. Contractor Incidents

A. All contractor incidents shall be reported to the contractor's management and in accordance with the requirements set forth in Appendix I.

B. Immediate notification of all contractor HSSE incidents involving EPIC led work activities shall be made to the location Supervisor, and to the EPIC Supervisor.

C. Management of the incident, including verbal and written notifications, shall be handled as follows:
   1. If the incident occurred on or at a USPL asset, the location Supervisor shall provide further verbal and written notifications (including Traction by selecting PU, then District, then specific asset, with the DOM as the approver) per Appendix I.
   2. If the incident did not occur on or at a USPL asset, the EPIC Supervisor shall provide further verbal and written notifications (including Traction by selecting HQ or PU, then EPIC, then functional area, with the EPIC Manager as the approver).

19. Major and High Potential (HiPo) Incident Reporting

The intent of the requirements in this section is to provide senior management with an immediate notification of significant or potentially significant events. Notification is grounded in the belief that “forewarned is forearmed” and does not imply responsibility or blame. The report of the incident is not expected to be a complete account of events or to contain authoritative information on cause, and it is not necessarily “recordable” as a BP incident. Group Major Incidents may or may not require activation or mobilization of the Incident Command System, including the Business Support Team (BST), Regional Incident Management Team (IMT), or Mutual Response Team (MRT).

19.1. General

A. An incident requiring emergency support and therefore notification to the BP Notification Center shall also be reported as a Group Major incident if it meets the criteria for a Major incident or a High Potential incident. See Appendices I and II for reporting requirements.
B. The Business Unit Leader shall notify the Chief Operating Officer Fuels Value Chain, the Head of S&OR R&M, and BP Legal of any Major incident through personal conversation.

*Note:* S&OR shall be the Technical Authority for Incident Classification and shall have “Agree” rights in classification of Major incidents and HiPo incidents.

C. A Major incident shall be verbally reported as soon as possible but within 8 hours for actual severity A-D and E. For Major or High Potential incidents with a potential severity A-D and E, reporting shall be within 24 hours. See Appendices I and II for the required verbal and written notifications for reporting Major and HiPo incidents.

*Note:* See Appendix V for a complete description of severity levels, and Appendix X for an assessment of potential severity requirements.

D. A written announcement for Major and High Potential incidents shall be distributed within 24 hours. The written announcement may either be a separate Word document completed and emailed, or it may be completed through Traction.

1. For the Word document method, forms are located in the Incident Reporting folder in DRM (link: Major Incident Announcement form, High Potential Incident Announcement form)

2. For the Traction method, when completing the Traction report of the incident, if the severity level A-D or E is marked, the system will ask, is the Major Incident Announcement (MIA) (for actual severity) or High Potential (HiPo) Notification (for potential severity) completed for this event?

a) Answering Yes means the Word document method is being used to make the written notification.

b) Answering No means Traction will use the information provided to send a notice to an originator to create an MIA / HiPo notification.

*Note:* Regardless of the method chosen, written notification must be made within 24 hours of the incident.

E. If this was a Major security incident not in the public domain, communicate securely with the Head of S&OR, US FVC SPUL, US FVC COO and COO executive assistant, VP of S&OR, and Regional Security Advisor as soon as possible but within 8 hours.

F. Within 45 days of the date of the incident, USPL’s S&O Manager (or delegate) shall issue the final Major or HiPo investigation report with the Lessons Learned summary, and distribute them by email to the agreed core distribution list and other addressees as appropriate to the incident location and business.

1. Core distribution list for MIA or HiPo reports is CEO Executive Assistant, COO Executive Assistants, and VP R&M S&OR.

2. Core distribution list for Lessons Learned is the full distribution list of G R&M Incident Notification (which includes the distribution for reports listed above).

19.2. Workplace Fatalities from Natural Causes

A. If the Business Unit Leader has reason to believe that a fatality is either the result of natural causes or is self-inflicted, they shall consult with the BP regional health director for a preliminary cause decision.

1. If the BP regional health director agrees that the fatality appears to be the result of a natural cause or is self-inflicted, BP group notification shall not be required.

2. If further investigation provides new information that the fatality is not the result of natural causes or self-inflicted, then the incident shall be reported per Appendices I and II.

B. If consultation with the BP regional health director is not possible, the BP leader shall comply with the notification requirements in Appendices I and II.
C. If the fatality is classified as a natural cause or is self-inflicted, but circumstances associated with the incident could have other potential consequences resulting in a potential severity level A-D or E classification (e.g., driver, crane operator, or another critical role), then notification requirements in Appendices I and II apply.

20. Electronic Group BP Reporting Requirements (Traction)

20.1. Incident Reporting

A. All USPL incidents (except near misses and stop work interventions) shall be entered into Traction, regardless of USPL or Group BP recordability. The originator of the report shall be a BP employee.

B. Specific information about the incident shall be recorded in Traction within the following time frame:

1. Within three business days of the incident, the minimum required information (indicated by **boldface** data field name lettering in Traction) shall be entered so that Regional or BU management can approve the incident report. If the minimum information is not available in the system, the approver will not be able to approve the incident report.

   **Note:** Approval of an incident report in Traction makes it visible to Group BP and only then is it properly counted in Group statistics. Once approved, only the initiator and the approver can update the Traction report. The HSSE Performance Analyst shall be notified of changes to an approved Traction report.

2. Following a root cause investigation, the initial Traction report shall be updated to include additional information about the incident within three business days of report approval. Additionally, the approved Root Cause Analysis report, if a separate document, shall be electronically attached to the incident report in the Traction system and forwarded to the HSSE Performance Analyst. Root cause investigations are conducted according to USPL’s Incident Investigation policy.

C. Incidents entered into Traction shall have their **actual** severity classified in accordance with Appendix VI. **Potential** severity shall also be classified in accordance with Appendix XI, Assessment of Potential Severity Requirements.

   1. Consult the HSSE Manager Performance Unit for advice if the probable serious outcome / consequence seem extremely unlikely. For example, a wasp sting can occasionally be fatal for someone allergic to wasp stings, but a first-aid case is a much more foreseeable consequence.

D. When the incident severity appears border-line between two levels, initially, the more severe level shall be chosen. Where tools and calculations are used, the information provided in conjunction with sound judgment and common sense shall be used to support a decision and shall be retained for at least six years.

E. The responsibility for the accuracy, completeness, and validity of information entered in Traction shall reside with the Approver of the Traction report, although other individuals may enter the data into Traction and complete other related reports. When entering Traction incident reports, consider the following:

   1. In the description of the incident, include who, what, when, where and the outcome of the incident, but why the incident occurred information should be in the Comprehensive List of Causes (CLC) section.

F. When an initial recording of severity level is later revised due to additional or new information, the person making the change shall ensure management and HSSE are in agreement with the change. Management and HSSE shall confirm the appropriate record in Traction is updated any additional local or BP Group notification is made.

G. Resolution of requests for clarification from BP group regarding the recordability or classification of incidents or unsafe / unhealthy conditions shall be handled in accordance with Annex 6 of GDP 4.4-0001, Reporting HSSE and Operational Incidents.
H. The determination of whether an incident or unsafe / unhealthy condition is within the recording scope of GDP 4.4-0001, Reporting HSSE and Operational Incidents, shall be initially based on the assumption that it is.

I. Questions regarding Traction should be directed to the HSSE Performance Analysts, who are the Local Traction System Administrators (LTSAs).

20.2. **Action Item Tracking**

A. The following list provides guidance for recording and tracking action items in Traction:

1. Is the action the result of an incident investigation?
2. Is the action the result of a visit from a regulatory agency or correspondence with a regulatory agency?
3. Is the action a result of an external audit (e.g., DOT, EPA, S&OR, or ISO)?
4. Is the action the result of a formal internal audit where a USPL process (e.g. HSE audit checklist, internal ISO, quality, CTM, etc.) has been applied?

*Note:* If the answer to any of the preceding questions is Yes, entry into Traction is necessary.

B. If the action is a result of a formal risk assessment, e.g. Process Hazard Analysis (PHA) or Hazard Operability (HAZOP) analysis, action item management will follow USPL Site Technical Practice 48-02, Process Hazard Analysis Policy.

C. See Appendix IV for a flow chart depicting action item prioritization and tracking as described in paragraphs A and B.

20.3. **Changing Action Item Due Dates**

A. When original action item due dates are changed to extend the due date, Traction will notify the approver who shall either approve or reject the proposed changes.

1. If the Approver approves the changes he / she is signifying that:
   a) The reason for the action item due date extension is acceptable.
   b) The risks if any, associated with delaying the completion date of the action item are mitigated appropriately and are acceptable.
   c) The intermediate actions, if any that shall be implemented until the Traction action item is completed are acceptable.
   d) That any intermediate actions were input into Traction as new action items.
   e) That the Traction action item, and any intermediate action item, responsible parties have been notified and agree to the changes.

21. **Training and Competency**

A. USPL management shall complete a one-time training course on incident reporting requirements. This course educates Supervisors about their incident-reporting obligations within USPL.

B. Non-supervisory USPL personnel shall complete a one-time training course that covers initial incident and agency action reporting.

C. Employees who enter information in Traction shall complete a one-time training course that covers the basic functionality of Traction.

D. Local Traction System Administrators (LTSAs) shall complete training on Traction with documentation kept in VTA.
22. **Sharing Incident Learnings**

Once incidents are reported, documented, and investigated, it is important to share any learnings that were derived from the investigation to aid in preventing a recurrence of the incident.

A. The following methods shall be used for sharing learnings:

1. Last Week in HSSE is a weekly email summarizing the previous week’s HSE incident reports.
2. The RCA Lessons Learned Data website contains finalized RCA reports. Navigate to this site from the USPL home page by selecting the Performance tab, then select USPL Performance, then HSSE Performance in the center of the page, then Links, then RCA Data; or click the following link: [RCA Lessons Learned Data](#).
3. The USPL Near Miss website ([Near Miss Reporting](#)) has information for reporting and trending near misses and stop work interventions.
4. USPL Lessons Learned Review Board ([Lessons Learned](#)) has a website for submitting and searching lessons learned.

23. **Safe Operating Limits Reporting**

A. It is the responsibility of the individual who discovers a safe design limit (SDL) exceedance to report the event to their supervisor and the local operations team immediately. If the event is first discovered by a Control Center employee, he/she shall notify their supervisor.

B. In addition, a local technician shall be notified for further on-site investigation and the technician shall report the incident to his/her team leader.

C. The local operations team leader shall then inform the District Operations Manager (or equivalent) of the incident.

D. Within 3 business days of notification, the District Operations Manager (or equivalent) shall complete a Traction entry to capture the event. This entry can be updated later as additional information becomes available. Safe operating limit exceedances do not require immediate reporting. Refer to USPL STP-48-101 for additional information relative to Safe Operating Limits.

24. **References**

1. GDP 4.4–0001, Reporting of Incidents (1 July 2012) ([link](#) Reporting HSSE and Operational Incidents)
2. GDP 4.4-0001-01, Reporting of Incidents - Annex 4 – Severity Matrixes (1 July 2012) ([link](#) Reporting HSSE and Operational Incidents - Annex 4 - Loss of Primary Containment Potential Severity Classification)
3. FIN RD 4.4-0001, BP Group HSE Reporting Definitions (10 January 2014) ([link](#) BP Group HSE Reporting Definitions)
4. FIN-GDP 4.4-0001-01, HSSE & Operational Data Reporting Requirements for BP Group (1 July 2010) (Finance Supplement to the GDP 4.4-001 Reporting HSSE and Operational Incidents) ([link](#) HSSE and Operational Data Reporting Requirements)
5. Fin-GDP 4.4-0001-02, HSSE & Operational incident reporting Boundaries (24 November 2011) (Finance Supplement to the GDP 4.4-001 Reporting HSSE and Operational Incidents) ([link](#) HSSE and Operational Incident Reporting Boundaries)


Appendix I
Incident Reporting and Documentation Summary

Notes:
1. The Supervisor, upon receiving first notification, shall follow local response plans, secure the incident scene if possible, obtain photographs or sketches of the scene, obtain written accounts of everyone involved, secure relevant paperwork, and gather other pertinent information.
2. The Supervisor is responsible in all cases for proper verbal and written reporting, regardless of who actually performs the tasks (employee or contractor).
3. The arrow (→) symbol is inclusive of all personnel between the beginning and end titles.
4. Verbal notification may include other interested parties not specifically listed (e.g., EPIC Project Managers).
5. ESIS prefers to receive an email or fax of incident details involving third parties.
6. Operations Manager is used generically to refer to the DOM, O&M Manager or the equivalent in other USPL departments, e.g. EPIC managers. Similarly, PUL is used generically and refers also to other department equivalents, e.g. EPIC Manager, etc.
7. HSSE Coordinator is a generic reference to the Environmental Coordinator, Safety Coordinator, Road Safety Advisor, Security Coordinator, or DOT Compliance Advisor as appropriate for the type of incident being reported.
8. Appendix II, BP Notification Center Call Requirements, has additional notification requirements.
9. For the timeline, days refers to business days unless otherwise noted.

<table>
<thead>
<tr>
<th>Incident Type</th>
<th>Verbal Reporting</th>
<th>Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Injury/Illness</td>
<td>Workforce → Supervisor</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Health Services Manager (for employees only)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>• First aid only: Supervisor → PUL, EPIC Supervisor (if contractor)</td>
<td>&lt; 1 shift</td>
</tr>
<tr>
<td></td>
<td>• Recordable injuries: Supervisor → PUL, EPIC Supervisor (if contractor) → BUL (to contact injured worker)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>• DAFW and fatality: Supervisor → BUL (to contact injured worker), EPIC Supervisor (if contractor)</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Safety Coordinator → HSSE Manager Performance Unit → HSSE Manager S&amp;O</td>
<td>Same timeline as operations notification above</td>
</tr>
<tr>
<td></td>
<td>For fatality, or hospitalizations, amputation or loss of eye to BP employee(s): Supervisor → OSHA</td>
<td>&lt; 8 hours fatality &lt; 24 hours others</td>
</tr>
<tr>
<td></td>
<td>For an incident-related fatality, a life-threatening injury, workplace violence, serious injury to a member of the public, or multiple (three or more) “days away from work” injuries to workforce: Supervisor → BP Notification Center</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Third-party Workers’ Comp administrator (for employees only)</td>
<td>&lt; 1 day</td>
</tr>
<tr>
<td>Vehicle Accident</td>
<td>Workforce → Supervisor and local police (if required)</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>For Non-Severe vehicle accidents: Supervisor → Safety Coordinator → HSSE Manager PU</td>
<td>&lt; 1 shift</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Operations Manager, EPIC Supervisor (if contractor)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>For Severe vehicle accidents only: Supervisor → Safety Coordinator → HSSE Manager PU → Road Safety Advisor → HSSE Manager S&amp;O</td>
<td>&lt; 2 hours</td>
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<tr>
<td></td>
<td>Supervisor → Operations Manager → PUL, EPIC Supervisor (if contractor)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Supervisor → National Response Center (if involving hazmat)</td>
<td>&lt; 12 hours</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Road Safety Advisor (if involving a commercial motor vehicle)</td>
<td>&lt; 1 day</td>
</tr>
<tr>
<td>Incident Type</td>
<td>Verbal Reporting</td>
<td>Timeline</td>
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<tr>
<td>------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td><strong>Incident Type</strong></td>
<td><strong>From → through the organization → To</strong></td>
<td><strong>Timeline</strong></td>
</tr>
<tr>
<td>Loss of Primary Containment—DOT jurisdictional equipment</td>
<td>Employee → Supervisor</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Operations Manager, EPIC Supervisor (if contractor)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Environmental Coordinator → HSSE Manager PU and DOT Compliance Advisor → DOT Team Leader</td>
<td>&lt; 1 hour</td>
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<tr>
<td></td>
<td>Supervisor → National Response Center (Refer to local Facility Response Plan and OMER manual)</td>
<td>&lt; 2 hours</td>
</tr>
<tr>
<td></td>
<td>Supervisor → BP Notification Center (see criteria in Appendix II)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td>Loss of Primary Containment—Non DOT jurisdictional equipment</td>
<td>Employee → Supervisor</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Operations Manager (if &lt; 5 gal) or → PUL (if ≥ 5 gal), EPIC Supervisor (if contractor)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Environmental Coordinator → HSSE Manager PU</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>Supervisor → National Response Center and local agency, if required (Refer to local Facility Response Plan)</td>
<td>Immediately</td>
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<tr>
<td></td>
<td>HSSE S&amp;O Manager → ISO Registrar (if directed by BST)</td>
<td>&lt; 2 hours</td>
</tr>
<tr>
<td></td>
<td>Supervisor → BP Notification Center (see criteria in Appendix II)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td>Environmental permit exceedance</td>
<td>Supervisor → Environmental Coordinator → HSSE Manager-PU or Environmental Coordinator → Supervisor of asset and HSSE Mgr-PU</td>
<td>&lt; 24 hours</td>
</tr>
<tr>
<td>Regulatory Agency Visit and Actions</td>
<td>Employee → Supervisor</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Operations Manager (required for actions but at own discretion for visits)</td>
<td>&lt; 8 hours</td>
</tr>
<tr>
<td></td>
<td>Employee (or Supervisor) → HSSE Coordinator → HSSE Manager PU, and Legal (if action is likely against BP)</td>
<td>Immediately</td>
</tr>
<tr>
<td>Property Damage</td>
<td>Workforce → Supervisor</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Operations Manager, EPIC Supervisor (if contractor)</td>
<td>&lt; 8 hours</td>
</tr>
<tr>
<td>Security Incidents</td>
<td>Workforce → Supervisor</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Employee → Local police</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Security Manager → Group Security</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → National Response Center (for Transportation Security Incidents (TSI), breaches of security and suspicious activity that may lead to a TSI.)</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → local Coast Guard (as a courtesy call after notifying the NRC)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>Supervisor → BP Notification Center (immediate security threat)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Operations Manager, EPIC Supervisor (if contractor)</td>
<td>&lt; 4 hours</td>
</tr>
<tr>
<td></td>
<td>Operations Manager, EPIC Supervisor (if contractor) → BUL (at own discretion)</td>
<td>&lt; 8 hours</td>
</tr>
<tr>
<td>Fraud and Misconduct Incidents</td>
<td>Workforce → USPL’s Fraud and Misconduct Responsible Person, i.e. USPL Control Manager</td>
<td>&lt; 1 day</td>
</tr>
<tr>
<td>Quality Incidents</td>
<td>Supervisor → Quality and Technical Service</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Operations Manager, EPIC Supervisor (if contractor)</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → Control Center (if applicable)</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>Supervisor → BP Notification Center (see criteria in Appendix II)</td>
<td>&lt; 1 hour</td>
</tr>
<tr>
<td>Near Misses and Stop Work</td>
<td>Workforce → Supervisor (evaluate learning potential to determine if further investigation would be beneficial)</td>
<td>&lt; 8 hours</td>
</tr>
</tbody>
</table>

*Revision Date: December 22, 2015*  
*Effective Date: January 1, 2016*  
*Next Review Date: December 22, 2020*  

Paper copies are uncontrolled and valid only at the time of printing. The controlled version of this document can be found in DRM in the HSSE Policies folder.
<table>
<thead>
<tr>
<th>Incident Type</th>
<th>Verbal Reporting</th>
<th>Timeline</th>
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</thead>
<tbody>
<tr>
<td><strong>Incident Type</strong></td>
<td><strong>From → through the organization → To</strong></td>
<td><strong>Timeline</strong></td>
</tr>
<tr>
<td><strong>Interventions</strong></td>
<td></td>
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</tr>
<tr>
<td>Items listed above could also be Major incidents or High Potential incidents. If so, the requirements below also apply. If not, the requirements are as summarized above.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Major Incidents</strong> (actual severity A-D and E unless noted)</td>
<td>Supervisor, EPIC Supervisor (if contractor) → BUL</td>
<td>Immediately</td>
</tr>
<tr>
<td></td>
<td>BUL → US FVC SPUL, US FVC COO, Head of S&amp;OR R&amp;M, BP legal</td>
<td>&lt; 8 hours</td>
</tr>
<tr>
<td></td>
<td><strong>For potential severity A-D and E:</strong> BUL → US FVC SPUL, US FVC COO, Head of S&amp;OR R&amp;M</td>
<td>&lt; 24 hours</td>
</tr>
<tr>
<td></td>
<td>Supervisor → BP Notification Center</td>
<td>&lt; 1 hour</td>
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<tr>
<td></td>
<td>BUL → President, BP America and R&amp;M Chief Executive</td>
<td>Prior to MIA</td>
</tr>
<tr>
<td></td>
<td>If marine operations related: Supervisor → USPL Marine Authority → R&amp;M Marine Authority → Group Marine Authority</td>
<td>&lt; 24 hours</td>
</tr>
<tr>
<td><strong>High Potential (HiPo) Incidents</strong></td>
<td>Supervisor, EPIC Supervisor (if contractor) → BUL</td>
<td>&lt; 24 hours</td>
</tr>
<tr>
<td></td>
<td>Supervisor → HSSE Coordinator → HSSE Manager PU → HSSE Manager S&amp;O</td>
<td>&lt; 24 hours</td>
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<tr>
<td></td>
<td>If marine operations related: Supervisor → USPL Marine Authority → R&amp;M Marine Authority → Group Marine Authority</td>
<td>&lt; 24 hours</td>
</tr>
<tr>
<td></td>
<td>BUL → US FVC COO, Head of S&amp;OR R&amp;M</td>
<td>&lt; 24 hours</td>
</tr>
<tr>
<td><strong>Safe Design Limit Exceedance</strong> (upper SDL or lower SDL)</td>
<td>If discovered by a Control Center operator, report to supervisor and call local technician for further investigation. Local technician reports the event to his/her supervisor. Employee → Supervisor supervisor → District Operations Manager (or equivalent) → Engineering Authority (for re-start or continued operation approval)</td>
<td>&lt; 24 hours</td>
</tr>
<tr>
<td><strong>Incident Type</strong></td>
<td><strong>Written Reporting</strong></td>
<td><strong>Timeline</strong></td>
</tr>
<tr>
<td><strong>Recipient or System</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Injury/Illness</strong></td>
<td>Entity communication for OSHA recordable injuries</td>
<td>&lt; 48 hours</td>
</tr>
<tr>
<td></td>
<td>Traction</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td></td>
<td>OSHA Log and OSHA Report (employees only)</td>
<td>&lt; 7 calendar days</td>
</tr>
<tr>
<td><strong>Vehicle Accident</strong></td>
<td>ESIS</td>
<td>1 day</td>
</tr>
<tr>
<td></td>
<td>Traction</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td></td>
<td>DOT Form 5800.1 (Commercial motor vehicles only)</td>
<td>&lt; 30 calendar days</td>
</tr>
<tr>
<td></td>
<td>DOT Accident Register (Commercial motor vehicles only)</td>
<td>&lt; 30 calendar days</td>
</tr>
<tr>
<td><strong>Loss of Primary Containment—DOT jurisdictional equipment</strong></td>
<td>Traction</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td></td>
<td>DOT Form 7000.1 (oil)</td>
<td>&lt; 30 calendar days</td>
</tr>
<tr>
<td></td>
<td>DOT Form 7100.1 (gas)</td>
<td>&lt; 30 calendar days</td>
</tr>
<tr>
<td></td>
<td>API PPTS Form by DOT Specialist</td>
<td>Quarterly</td>
</tr>
<tr>
<td></td>
<td>Form F-195.402(c)(5) by Response Manager</td>
<td>&lt; 4 weeks</td>
</tr>
<tr>
<td></td>
<td>Local and State Agency requirements (Refer to local Facility Response Plan)</td>
<td>&lt; 4 weeks</td>
</tr>
<tr>
<td><strong>Loss of Primary containment</strong></td>
<td>Traction</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td>Incident Type</td>
<td>Written Reporting</td>
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<td>------------------------------------------------------------------------------</td>
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<tr>
<td><strong>Recipient or System</strong></td>
<td><strong>Timeline</strong></td>
<td></td>
</tr>
<tr>
<td>Containment—Non-DOT jurisdictional equipment</td>
<td>API PPTS form by DOT Specialist (spills ≥ 5 gal)</td>
<td>Quarterly</td>
</tr>
<tr>
<td></td>
<td>Local and State Agency requirements (Refer to local Facility Response Plan)</td>
<td>&lt; 4 weeks</td>
</tr>
<tr>
<td>Regulatory Agency Visit and Actions</td>
<td>Traction</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td></td>
<td>SharePoint (Notices/ violations/ citations only)</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td></td>
<td>Email to HSSE Manager-S&amp;O, and DOT Specialist.</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td></td>
<td>For Compliance Notices only – Compliance Notice to USPL form (as requested in  paragraph 11.2.E)</td>
<td>&lt; 10 days</td>
</tr>
<tr>
<td>Property Damage</td>
<td>ESIS</td>
<td>&lt; 1 day</td>
</tr>
<tr>
<td></td>
<td>Traction</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td>Security Incidents</td>
<td>Traction</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td>Quality Incidents</td>
<td>Traction</td>
<td>&lt; 3 days</td>
</tr>
<tr>
<td>Near Misses and Stop Work Interventions</td>
<td>Near Miss Reporting Tool (may also require Traction reporting if management requests further investigation)</td>
<td>&lt; 3 days</td>
</tr>
</tbody>
</table>

Items listed above could also be Major incidents or High Potential incidents. If so, the requirements below also apply. If not, the requirements are as listed above.

**Major Incidents**

1. *Email MIA form to G R&M Incident Notification (after GVP approval); G PL Extended Leadership; Head of S&OR R&M, US FVC SPUL, US FVC COO, COO executive assistant, VP of S&OR R&M, or 2. Complete a Major Incident Announcement (MIA) report in Traction.

   - Severity A–D & E (actual or potential) < 24 hours

   Traction < 3 days

   *Note: If this was a Major security incident not in the public domain, communicate securely with the Head of S&OR R&M, US FVC SPUL, US FVC COO and COO executive assistant, VP of S&OR R&M, and Regional Security Advisor. < 24 hours

**High Potential (HiPo) Incidents**

1. *Email HiPo Announcement form to G R&M Incident Notification; G PL Extended Leadership; or 2. Complete a High Potential Incident Announcement (HiPo) report in Traction.

   Traction < 3 days

   *Note: If this was a HiPo security incident not in the public domain, communicate securely with the Head of S&OR R&M, US FVC SPUL, US FVC COO and COO executive assistant, VP of S&OR R&M, and Regional Security Advisor. < 24 hours

**Safe Design Limit Excursion (upper SDL or lower SDL)**

District Operations Manager (or equivalent) shall enter in Traction < 3 days
**Appendix II**

**BP Notification Center Call Requirements**

Revised April 30, 2003

<table>
<thead>
<tr>
<th>Type of Incident</th>
<th>Telephone the Notification Center within 1 hour if the incident meets the following criteria:</th>
</tr>
</thead>
</table>
| Injury or fatality to BP personnel, contractors, or the public                  | • An incident-related fatality; or  
• A life-threatening injury; or  
• Workplace violence; or  
• Serious injury to a member of the public; or  
• Multiple (three or more) “days away from work” injuries to BP employees or contractors.                                                                                                                                                                                                                                                                         |
| Release of crude, petroleum product, chemical, or hazardous substance to the air, water, land, or subsurface in excess of government limitations (permit or other) or reportable to a government agency | • There are impacts to the surrounding community, including evacuation or a serious threat to public health or safety; or  
• There is the potential for significant environmental impact; or  
• A coordinated cleanup effort will be required with agencies and outside services; or  
• Significant adverse media coverage is probable or existing; or  
• In accordance with OMER or FRP.                                                                                                                                                                                                                                                                |
| Explosion and fire                                                              | • There is off-site or significant on-site impact.                                                                                                                                                                                                                                                                                                                                                                         |
| Serious threats to security                                                     | • The threat is immediate (such as ongoing demonstrations or a bomb or kidnapping threat).                                                                                                                                                                                                                                                                                                                                       |
| Potential product recall                                                         | • There is a serious health risk; or  
• Deliberate product tampering is involved.                                                                                                                                                                                                                                                                                                                                                                                             |
| Incidents not specifically listed above                                         | • The facility management believes the incident could have a significant impact or could cause significant adverse attention to BP (i.e., adverse reaction from authorities, media, NGOs, or the general public).                                                                                                                                                                                                                                               |
| Major Incident Announcement (MIA)                                               | • The incident meets the criteria of a Major Incident Announcement.                                                                                                                                                                                                                                                                                                                                                                 |
| Rail Incident                                                                   | • North America Rail has requested notification for all incidents.                                                                                                                                                                                                                                                                                                                                                                 |

BP Notification Center  800-321-8642
Appendix III
Integrity Management Incident Decision Tree

An Integrity Management incident is an incident whose main root cause is addressed by the IM Standard and which involves actual or potential harm to people or the environment, including:

- Loss or potential loss of primary containment, or
- Failure of an engineered system (mechanical, electrical, structural, lifting, process or process control, and protective systems or devices).

Integrity Management Incident Decision Tree

Failure of Engineered system? | Actual or potential harm to people or environment? | Incident covered by Driving Standard or Group Marine standard or Control of Work Standard? | Did a protective device or system fail? Was a piece of equipment, structure, or process modified without MOC? | Was there loss of containment (or potential for loss of containment)? |
---|---|---|---|---|
Yes | Yes | Yes | Yes | IM Related |
Yes | Yes | Yes | No | IM Related |
Yes | No | No | No | Non-IM Related |
No | No | No | Yes | IM Related |
No | No | No | No | Non-IM Related
Appendix IV

Prioritizing and Tracking Action Items to Closure

An action item is created.

Is the action item the result of an incident investigation (including near miss or stop work RCA’s)?

Yes

Prioritization is conducted by the RCA Lead and Operations Supervisor based on prior experience, degree of risk, expected time and resources to complete using their education, training, and professional experience.

No

Supervisor enters action items in Traction.

Is the action item the result of an audit or inspection, e.g. external audit from anyone who does not directly support the specific facility or operational area, regulatory agency visit, external consultant, etc?

Yes

Prioritization is set by the auditor or Agency with some consideration to the resources to complete.

No

Refer to STP 48-02, and GDP-31-001 for prioritization.

Is the action item the result a risk assessment from a Process Hazard Analysis (PHA) or Hazard Operability (HAZOP) analysis?

Yes

Action items are tracked on analysis spreadsheet and reviewed quarterly with USPL Leadership Team.

No

Entry into Traction not required.
## Appendix V

### HSSE and Business Impact Severity Matrix

<table>
<thead>
<tr>
<th>Health &amp; Safety</th>
<th>Environmental</th>
<th>Business Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Event with widespread or extensive damage to any environment, including sensitive and non-sensitive environments, and remains in &quot;unsatisfactory&quot; state for a period of &gt; five years.</td>
<td><strong>Non-Financial</strong></td>
</tr>
<tr>
<td></td>
<td>Event with widespread or extensive damage to a non-sensitive environment and can be restored to an equivalent capability in a period of around one year.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Event with localized, widespread or extensive damage to a sensitive environment and can be restored to an equivalent capability in a period of around one year.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Event with widespread or extensive damage to a non-sensitive environment and can only be restored to a satisfactory / agreed state in a period of more than one year and up to five years.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Event with widespread or extensive damage to a sensitive environment and can only be restored to a satisfactory / agreed state in a period of more than one year and up to five years.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Event with widespread damage to a sensitive or non-sensitive environment and can be restored to an equivalent capability in a period of months.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Event with extensive damage to a sensitive environment and can be restored to an equivalent capability in a period of months.</td>
<td></td>
</tr>
</tbody>
</table>

- **A-D**
  - Three or more fatalities.
  - Identified onset of life-threatening health effects to three or more individuals.
  - 30 or more injuries or health effects, either permanent or requiring hospital treatment for more than 24 hours.

- **Incident Category**
  - Non-Financial
  - Financial – equipment / property damage
  - >$10m Equipment / property damage
  - Major
<table>
<thead>
<tr>
<th>Health &amp; Safety</th>
<th>Environmental</th>
<th>Business Impact</th>
<th>Financial – equipment / property damage</th>
<th>Incident Category</th>
</tr>
</thead>
</table>
| **E** |  • One to two fatalities, acute or chronic, actual or alleged.  
  • 10 or more injuries or health effects, either permanent or requiring hospital treatment for more than 24 hours. |  • Event with localized damage to a non-sensitive environment and can be restored to an equivalent capability in a period of one year.  
  • Event with extensive damage to a non-sensitive environment and can be restored to an equivalent capability in a period of months.  
  • Event with localized damage to a sensitive environment and can be restored to an equivalent capability in a period of months.  
  • Event with extensive damage to a sensitive environment and can be restored to an equivalent capability in a period of days or weeks. |  • Other adverse enforcement action by regulators.  
  • Limited interest-group outrage in a non-major market.  
  • Short-term adverse national or international media coverage.  
  • Damage to relationships with key stakeholders of benefit to the Strategic Performance Unit (SPU). | $1m – $10m Equipment / property damage | Major |
| **F** |  • Permanent partial disabilities.  
  • Several non-permanent injuries or health impacts.  
  • Days Away From Work Case (DAFWC) |  • Event with localized damage to a non-sensitive environment and can be restored to an equivalent capability in a period of months.  
  • Event with immediate area damage to a sensitive environment and can be restored to an equivalent capability in a period of months.  
  • Event with extensive damage to a non-sensitive environment and can be restored to an equivalent capability in a period of days or weeks.  
  • Event with localized damage to a sensitive environment and can be restored to an equivalent capability in a period of days or weeks. |  • Regulatory compliance issue which does not lead to regulatory or other higher severity level consequence.  
  • Prolonged adverse local media coverage.  
  • Local adverse social impact.  
  • Damage to relationships with key stakeholders of benefit to the Performance Unit (PU). | $100k – <$1m Equipment / property damage | Serious |
| **G** |  • Single or multiple recordable injury or health effects from a common source / event. |  • Event with immediate area damage to a non-sensitive environment and can be restored to an equivalent capability in a period of months.  
  • Event with localized damage to a non-sensitive environment and can be restored to an equivalent capability in a period of days or weeks.  
  • Event with immediate area damage to a sensitive environment and can be restored to an equivalent capability in a period of days or weeks. |  • Short-term adverse local media coverage.  
  • Some disruption to local operations (e.g., loss of single-road access for less than 24 hours). | $25k – <$100k Equipment / property damage | Serious |
| **H** |  • First aid.  
  • Single or multiple over-exposures causing noticeable irritation but no actual health effects. |  • Event with immediate area damage to a non-sensitive environment and can be restored to an equivalent capability in a period of days or weeks. |  • Isolated and short-term complaints from neighbors (e.g., complaints about specific noise episode). | <$25k Equipment / property damage | Minor |
Note: The HSSE severity levels are aligned with those in GDP 3.1-0001 Assessment, Prioritization and Management of Risk Annex 1.

Note: The non-financial severity levels are aligned with those in GDP 3.1-0001 Assessment, Prioritization and Management of Risk in Annex 2.

Note: When categorising financial impact severity, to meet the requirements of this practice, only equipment / property damage (replacement cost) as a result of a HSSE incident or unsafe condition or unhealthy condition is considered. The financial impact values in the table below therefore differ from those in GDP 3.1-0001 Annex 2.
Appendix VI

Process Safety Event Decision Tree (draft)

Was there a loss of material from primary containment?
  Yes
    Select incident type Material release
    Enter material category?
      Yes
        Enter material released
        Enter Material released quantity (sense check volume / mass)
      No
        Enter duration of material release
        Did the release last longer than 60 mins?
          Yes
            Enter Acute flow (maximum amount released in 60 mins)
            Enter the total quantity of material released to determine incident severity (GDP4.4-001 Annex 4)
            Enter where the material was released to and from e.g.
          No
            Use the acute flow to determine incident severity (GDP4.4-001 Annex 4)
            Enter where the material was released to and from e.g.
            Was the material released directly to atmosphere via a safety relief valve?
              Yes
                Did the safety relief valve operate as intended?
                  Yes
                    This incident could be included in LOPC metric if severity >=G
                  No
                    No
                No
              No
                Yes
                  Yes
                    This incident would not be included in LOPC metric
                  No
                    No
                No
              No
            No
              Yes
                Yes
                  This incident could be included in LOPC metric if severity >=G
                No
                  No
              No
          No
  No
    This is not a LOPC incident select a different incident type
    This is a near miss

* If 'Other Hazardous' is selected as a material category, Traction will request two additional pieces of information:
  a. Is the flash point of material released > 60 ˚C?
  b. Is material released at or above its flash point?
### Table 1—Tier 1 Material Release Threshold Quantities

<table>
<thead>
<tr>
<th>Threshold Release Category</th>
<th>Material Hazard Classification(^{\text{a,c,d}})</th>
<th>Threshold Quantity (outdoor release)</th>
<th>Threshold Quantity (indoor(^{\text{b}}) release)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>TIH Zone A Materials</td>
<td>5 kg (11 lb)</td>
<td>2.5 kg (5.5 lb)</td>
</tr>
<tr>
<td>2</td>
<td>TIH Zone B Materials</td>
<td>25 kg (55 lb)</td>
<td>12.5 kg (27.5 lb)</td>
</tr>
<tr>
<td>3</td>
<td>TIH Zone C Materials</td>
<td>100 kg (220 lb)</td>
<td>50 kg (110 lb)</td>
</tr>
<tr>
<td>4</td>
<td>TIH Zone D Materials</td>
<td>200 kg (440 lb)</td>
<td>100 kg (220 lb)</td>
</tr>
<tr>
<td>5</td>
<td>Flammable Gases</td>
<td>500 kg (1100 lb)</td>
<td>250 kg (550 lb)</td>
</tr>
<tr>
<td></td>
<td>or Liquids with Initial Boiling Point (\leq 35 \degree\mathrm{C}) (95 \degree\mathrm{F}) and Flash Point &lt; 23 \degree\mathrm{C} (73 \degree\mathrm{F})</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>or Other Packing Group I Materials excluding strong acids/bases</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Liquids with Initial Boiling Point &gt; 35 \degree\mathrm{C} (95 \degree\mathrm{F}) and Flash Point &lt; 23 \degree\mathrm{C} (73\degree\mathrm{F})</td>
<td>1000 kg (2200 lb)</td>
<td>500 kg (1100 lb)</td>
</tr>
<tr>
<td></td>
<td>or Other Packing Group II Materials excluding moderate acids/bases</td>
<td>or</td>
<td>or</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7 bbl</td>
<td>3.5 bbl</td>
</tr>
<tr>
<td>7</td>
<td>Liquids with Flash Point (\geq 23 \degree\mathrm{C} (73 \degree\mathrm{F})) and (\leq 60 \degree\mathrm{C} (140 \degree\mathrm{F}))</td>
<td>2000 kg (4400 lb)</td>
<td>1000 kg (2200 lb)</td>
</tr>
<tr>
<td></td>
<td>or Liquids with Flash Point &gt; 60 \degree\mathrm{C} (140 \degree\mathrm{F}) released at a temperature at or above Flash Point</td>
<td>or</td>
<td>or</td>
</tr>
<tr>
<td></td>
<td>or strong acids/bases</td>
<td>14 bbl</td>
<td>7 bbl</td>
</tr>
<tr>
<td></td>
<td>or Other Packing Group III Materials</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

It is recognized that threshold quantities given in kg and lb or in lb and bbl are not exactly equivalent. Companies should select one of the pair and use it consistently for all recordkeeping activities.

\(^{\text{a}}\) Many materials exhibit more than one hazard. Correct placement in Hazard Zone or Packing Group shall follow the rules of DOT 49 CFR 173.2a\(^{[14]}\) or UN Recommendations on the Transportation of Dangerous Goods, Section 2\(^{[10]}\). See Annex B.

\(^{\text{b}}\) A structure composed of four complete (floor to ceiling) walls, floor, and roof.

\(^{\text{c}}\) For solutions not listed on the UNDG, the anhydrous component shall determine the TIH zone or Packing Group classification. The threshold quantity of the solution shall be back calculated based on the threshold quantity of the dry component weight.

\(^{\text{d}}\) For mixtures where the UNDG classification is unknown, the fraction of threshold quantity release for each component may be calculated. If the sum of the fractions is equal to or greater than 100 %, the mixture exceeds the threshold quantity. Where there are clear and independent toxic and flammable consequences associated with the mixture, the toxic and flammable hazards are calculated independently. See Annex A, Examples 28, 29, and 30.
### Table 2—Tier 2 Material Release Threshold Quantities

<table>
<thead>
<tr>
<th>Threshold Release Category</th>
<th>Material Hazard Classification (^{a,c,d})</th>
<th>Threshold Quantity (outdoor release)</th>
<th>Threshold Quantity (indoor(^b) release)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>TIH Zone A Materials</td>
<td>0.5 kg (1.1 lb)</td>
<td>0.25 kg (0.55 lb)</td>
</tr>
<tr>
<td>2</td>
<td>TIH Zone B Materials</td>
<td>2.5 kg (5.5 lb)</td>
<td>1.2 kg (2.8 lb)</td>
</tr>
<tr>
<td>3</td>
<td>TIH Zone C Materials</td>
<td>10 kg (22 lb)</td>
<td>5 kg (11 lb)</td>
</tr>
<tr>
<td>4</td>
<td>TIH Zone D Materials</td>
<td>20 kg (44 lb)</td>
<td>10 kg (22 lb)</td>
</tr>
<tr>
<td>5</td>
<td>Flammable Gases or Liquids with Initial Boiling Point ≤ 35 °C (95 °F) and Flash Point &lt; 23 °C (73 °F) or Other Packing Group I Materials excluding strong acids/bases</td>
<td>50 kg (110 lb)</td>
<td>25 kg (55 lb)</td>
</tr>
<tr>
<td>6</td>
<td>Liquids with a Initial Boiling Point &gt; 35 °C (95 °F) and Flash Point &lt; 60 °C (140 °F) or Liquids with Flash Point &gt; 60 °C (140 °F) released at or above Flash Point; or Other Packing Group II and III Materials excluding moderate acids/bases or Strong acids and bases</td>
<td>100 kg (220 lb) or 1 bbl</td>
<td>50 kg (110 lb) or 0.5 bbl</td>
</tr>
<tr>
<td>7</td>
<td>Liquids with Flash Point &gt; 60 °C (140 °F) released at a temperature below Flash Point or Moderate acids/bases</td>
<td>1000 kg (2200 lb) or 10 bbl</td>
<td>500 kg (1100 lb) or 5 bbl</td>
</tr>
</tbody>
</table>

In order to simplify determination of reporting thresholds for Tier 2, Categories 6 and 7 in Tier 1 have been combined into one category in Tier 2 (Category 6). The simplification is intended to provide less complicated requirements for those events with lesser consequences.

It is recognized that threshold quantities given in kg and lb or in lb and bbl are not exactly equivalent. Companies should select one of the pair and use it consistently for all recordkeeping activities.

- \(^a\) Many materials exhibit more than one hazard. Correct placement in Hazard Zone or Packing Group shall follow the rules of DOT 49 CFR 173.2a\(^{[14]}\) or UN Recommendations on the Transportation of Dangerous Goods, Section 2\(^{[10]}\). See Annex B.
- \(^b\) A structure composed of four complete (floor to ceiling) walls, floor and roof.
- \(^c\) For solutions not listed on the UNDG, the anhydrous component shall determine the TIH zone or Packing Group classification. The threshold quantity of the solution shall be back calculated based on the threshold quantity of the dry component weight.
- \(^d\) For mixtures where the UNDG classification is unknown, the fraction of threshold quantity release for each component may be calculated. If the sum of the fractions is equal to or greater than 100%, the mixture exceeds the threshold quantity. Where there are clear and independent toxic and flammable consequences associated with the mixture, the toxic and flammable hazards are calculated independently. See Annex A, Examples 28, 29, and 30.

To determine the kilograms (kg) for LOPC materials, use the rule of thumb (1 bbl = 150 kg).
To more precisely determine the Weight (in kilograms) for LOPC materials, divide the volume (in gallons) by the conversion factor listed in the chart below. The LOPC Severity Matrix in Traction requires the weight of the material released to correctly assign a severity level.

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Specific Gravity</th>
<th>Conversion Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gasoline</td>
<td>0.74</td>
<td>0.357</td>
</tr>
<tr>
<td>Diesel</td>
<td>0.88</td>
<td>0.300</td>
</tr>
<tr>
<td>Jet Fuel</td>
<td>0.82</td>
<td>0.322</td>
</tr>
<tr>
<td>Crude Oil or Transmix</td>
<td>0.83</td>
<td>0.318</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.87</td>
<td>0.304</td>
</tr>
<tr>
<td>Ethanol</td>
<td>0.79</td>
<td>0.334</td>
</tr>
</tbody>
</table>
Appendix VII

Loss of Primary Containment Severity Classification

(From GDP 4.4-0001-04 Reporting of Incidents - Annex 4 - Loss of Primary Containment Severity Classification)

Appendix VII is used for the purpose of classifying LOPC incidents used for the BP LOPC metric. In addition, the LOPC classification is used as a minimum potential severity for recording or notification purposes as per Annex 3.E of GDP 4.4-0001.

The LOPC classification is based on acute flow. An acute flow is the maximum quantity of material released in any one hour period. (This is only relevant when the material is released over a time period greater than one hour.)

BP Group has provided further guidance in GG 4.4-0002, Reporting of a Loss of Primary Containment (LOPC) Incident. A copy of this guide is in the Incident Reporting folder in DRM. (Link: Group Guidance 4.4-002, Reporting LOPC Incidents Guidance).

If a substance has more than one associated hazard (e.g., flammable / explosive and toxic), the predominant physical characteristic associated in Annex 4.1 or 4.2 shall be used.

<table>
<thead>
<tr>
<th>Type of substance</th>
<th>Flammable gases and vapours</th>
<th>Flammable liquids(^1)</th>
<th>Other hazardous categories including combustible or corrosive gases/ fluids/vapours or solids</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offshore releases – manned facilities</td>
<td>Offshore releases – unmanned facilities</td>
<td>Onshore – loss of primary containment</td>
<td></td>
</tr>
<tr>
<td>Level A-D</td>
<td>&gt; 5000 kg</td>
<td>&gt; 50000 kg</td>
<td>&gt; 10000 kg</td>
</tr>
<tr>
<td>Level E</td>
<td>500 &lt; 5000 kg</td>
<td>5000 &lt; 50000 kg</td>
<td>1000 &lt; 10000 kg</td>
</tr>
<tr>
<td>Level F</td>
<td>50 &lt; 500 kg</td>
<td>500 &lt; 5000 kg</td>
<td>100&lt;1000 kg</td>
</tr>
<tr>
<td>Level G</td>
<td>5 &lt; 50 kg</td>
<td>50 &lt; 500 kg</td>
<td>10 &lt; 100 kg</td>
</tr>
<tr>
<td>Level H</td>
<td>&lt; 5 kg</td>
<td>&lt; 50 kg</td>
<td>&lt; 10 kg</td>
</tr>
</tbody>
</table>
### Loss of primary containment severity classification

<table>
<thead>
<tr>
<th>Type of substance</th>
<th>Flammable gases and vapours</th>
<th>Flammable liquids¹</th>
<th>Other hazardous categories including combustible or corrosive gases/fluids/vapours or solids</th>
</tr>
</thead>
<tbody>
<tr>
<td>Definitions⁵</td>
<td>Definition of flammable gas: Gaseous material, at ambient temperature/pressure, that forms a flammable mixture where the Lower Flammable Limit is &lt;13%, or the range between the Lower and Upper Flammability Limit is &gt;12%. Liquids with boiling point ≤35 °C and flash point &lt;23 °C or Other Packing Group I Materials excluding strong acids/bases.</td>
<td>Definition of flammable liquid: Liquids with boiling point &gt;35 °C and flash point &lt;23 °C Other Packing Group II Materials excluding moderate acids/bases. Strong acids/bases.</td>
<td>Definition of other hazardous materials: Packing Group III materials, a comprehensive list of substances is available under the categorization as defined by United Nations (UN) Dangerous Goods definitions (e.g., corrosives including acid or base, organic peroxides, pyrophoric materials). Liquids with a flash point ≥23°C Moderate acids/bases. (Note: Traction will request whether the liquid has a flashpoint &gt;60°C and was it released at or above its flash point.)</td>
</tr>
</tbody>
</table>

¹ Rule of Thumb: conversion factor is approximately 150 kg = 1 barrel.

² Definitions are as of July 2012. For the most current definition refer to FIN-RD 4.4-0001 BP Group HSE Reporting Definitions.

### Toxic substances³ - Potential severity classification

*(potential human inhalation hazard)*

<table>
<thead>
<tr>
<th>Substance class</th>
<th>Lower toxicity substance (Class D)</th>
<th>Medium toxicity substance (Class C)</th>
<th>Higher toxicity substance (Class B)</th>
<th>Acutely toxic substance (Class A)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level A-D</td>
<td>&gt; 4000 kg</td>
<td>&gt; 2000 kg</td>
<td>&gt; 1000 kg</td>
<td>&gt; 50 kg</td>
</tr>
<tr>
<td>Level E</td>
<td>2000 &lt; 4000 kg</td>
<td>1000 &lt; 2000 kg</td>
<td>250 &lt; 1000 kg</td>
<td>15 &lt; 50 kg</td>
</tr>
<tr>
<td>Level F</td>
<td>200 &lt; 2000 kg</td>
<td>100 &lt; 1000 kg</td>
<td>25 &lt; 250 kg</td>
<td>5.0 kg &lt; 15 kg</td>
</tr>
</tbody>
</table>

All gas, vapour, mist or aerosol LOPC, regardless of location
### Toxic substances - Potential severity classification

(potential human inhalation hazard)

<table>
<thead>
<tr>
<th>Level</th>
<th>50 &lt; 200 kg</th>
<th>25 &lt; 100 kg</th>
<th>5 &lt; 25 kg</th>
<th>0.5 &lt; 5.0 kg</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level G</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Level H</td>
<td>&lt; 50 kg</td>
<td>&lt; 25 kg</td>
<td>&lt; 5 kg</td>
<td>&lt; 0.5 kg</td>
</tr>
</tbody>
</table>

3 From Center for Chemical Process Safety (CCPS) and American Petroleum Institute (API) guidelines based on UN Dangerous Goods definitions, November 2007.

To determine the kilograms (kg) for LOPC materials, use the rule of thumb (1 bbl = 150 kg).

To more precisely determine the Weight (in kilograms) for LOPC materials, divide the volume (in gallons) by the conversion factor listed in the chart below.

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Specific Gravity</th>
<th>Conversion Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gasoline</td>
<td>0.74</td>
<td>0.357</td>
</tr>
<tr>
<td>Diesel</td>
<td>0.88</td>
<td>0.300</td>
</tr>
<tr>
<td>Jet Fuel</td>
<td>0.82</td>
<td>0.322</td>
</tr>
<tr>
<td>Crude Oil or Transmix</td>
<td>0.83</td>
<td>0.318</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.87</td>
<td>0.304</td>
</tr>
<tr>
<td>Ethanol</td>
<td>0.79</td>
<td>0.334</td>
</tr>
</tbody>
</table>
Appendix VIII

Commercial Motor Vehicle Accident Reporting

A. The Supervisor shall notify the National Response Center (800-424-8802) as soon as practical but within 12 hours if any of the following occurs involving a BP driver during loading, transportation, unloading, or temporary storage in which as a direct result of hazardous materials:

1. A person is killed;
2. A person receives an injury requiring admittance to a hospital;
3. The general public is evacuated for one hour or more;
4. A major transportation artery or facility is closed or shut down for one hour or more;
5. The operational flight pattern or routine of an aircraft is altered; or
6. A situation exists of such a nature (e.g., a continuing danger to life exists at the scene of the incident) that, in the judgment of the carrier, it should be reported to NRC even though it does not meet the criteria listed above.

B. The Supervisor shall submit DOT Form 5800.1, “Hazardous Materials Incident Report,” whenever any of the following occurs involving a BP driver during loading, transportation, unloading, or temporary storage:

1. Any incident requiring National Response Center notification, as listed above.
2. An unintentional release of a hazardous material. (See paragraph E below for exceptions.)
3. The following types of damage to a specification cargo tank with a capacity of 1,000 gallons or greater containing any hazardous material:
   a) Structural damage to the lading (cargo tank and piping) retention system; or
   b) Damage that requires repair to a system intended to protect the lading retention system, even if there is no release of hazardous material.

C. DOT Form 5800.1 shall be submitted within 30 days to the Information Systems Manager, DHM-63, Research and Special Programs Administration, Department of Transportation, Washington, D.C. 20590-0001. (The report can also be completed and submitted online via the following link: http://hazmat.dot.gov.)

Note: When a DOT-related incident (as defined in paragraphs A or B above) involves a non-BP driver (e.g., exclusive-use carrier, call-and-demand carrier, jobber, etc.), the notification and reporting requirements are the responsibility of the carrier and not BP.

D. DOT Form F 5800.1 shall be updated within one year of the date of the occurrence of the incident whenever

1. A death results from an injury caused by a hazardous material;
2. There was a misidentification of the hazardous material or packaging information on a prior incident report;
3. Damage, loss, or related cost that was not known when the initial incident report was filed becomes known; or
4. Damage, loss, or related cost changes by $25,000 or more or 10% of the prior total estimate, whichever is greater.

E. Unless a telephone report is required, the DOT Form 5800.1 requirements do not apply to a release of a minimal amount of material from the following:

1. A vent for material for which venting is authorized;
2. The routine operations of a seal, pump, compressor, or valve; or
3. Connection or disconnection of loading or unloading lines if the release does not result in property damage.
Appendix IX

Incident Classification Resolution Process

A. The business line shall be accountable for reporting incident data in accordance with the requirements of GDP 4.4-0001 Reporting of Incidents. S&OR Finance is accountable group-wide for assuring the integrity of BP’s group Non-Financial Management Information (NFMI). Central S&OR provides specific subject matter expertise on HSSE topics to support accurate and consistent reporting.

B. Clarification on the reportability or classification of incidents may be requested by S&OR. These may include, for example, whether an incident is work-related, whether an injury is properly classified as Days Away From Work Cases (DAFWC) or a recordable Injury, whether or how an incident is properly classified as Loss of Primary Containment (LOPC), or incident severity classification.

C. Requests for clarification from Central S&OR or S&OR finance shall be directed to the line initially through the relevant Deployed S&OR VP.

D. In response to Annex 6, item C above, line management shall consult with local and Central S&OR subject matter experts as needed.

E. If a difference of view is identified and not resolved by this means, the issue shall be referred to the following:
   1. Group Head of Risk, Learning & HSSE, S&OR.
   2. S&OR CFO (or delegate).

F. The Group Head of Risk, Learning & HSSE, S&OR and the S&OR CFO (or delegate) shall consult with representatives from the segment (or equivalent) and, if appropriate, with resources outside the company before advising line management of their recommendation. In order to reach resolution, it may be necessary to escalate through both the line and the S&OR organisations.

G. Ultimate authority for classification resolution shall reside with executive management.
## Appendix X

### Assessment of Potential Severity Requirements

#### Annex 3 - Assessment of potential severity requirements

The potential severity classification of an incident or unsafe condition or unhealthy condition is based upon a judgment of the most serious probable outcome.

A. The assessment of potential severity shall take into consideration under different circumstances, could the consequence of the incident have been more serious for the:
   a) Health, safety and security of people and the environment?
   b) Equipment (e.g., damage)?
   c) Privilege to operate?

B. Different circumstances shall include, but are not limited to:
   1. Time of day.
   2. Weather (e.g., wind direction or strength).
   3. Presence or absence of people going about their normal routine/business.
   4. Exceptional intervention of people.
   5. Similar activity with similar controls carried out by the same operation elsewhere.
   6. A source of ignition could have been present, even if the likelihood is low.
   7. If someone or equipment was struck with enough energy to injure an individual or damage or break the equipment, even if the event was minor.

C. The person making the assessment of potential severity shall consult the entity HSSE team for advice if the most serious probable outcome (or consequence) seems extremely unlikely.  
   For example, a wasp sting can occasionally be fatal for someone allergic to wasp stings, but a first-aid case is a much more probable consequence.

D. The BP ‘Dropped Objects Calculator’ shall be used to inform the assessment of potential severity for an incident involving objects falling from height. The calculator is located in the Incident Reporting folder, under HSSE Policies in DRM.  
   The ‘BP Dropped Objects Calculator’ is that approved by the VP Safety and Investigations, S&OR.

E. LOPC classification (per GDP 4.4-0001, Annex 4) shall establish the minimum potential severity for recording or notification purposes.
   Potential severity may be higher than the LOPC classification based on the actual circumstances of the incident.

F. Additional guidance provided in Group HSSE Reporting website shall be used for the assessment of potential severity classification.
   Additional guidance on potential severity classification, including examples of incidents that would normally be classified as a HiPo, may be provided on the Group HSSE Reporting website.