

Permit to Work

1. Purpose

This policy defines common requirements for Control of Work (CoW) and specific requirements for Permit to Work (PTW) including the following:

- Key roles and responsibilities for Control of Work.
- Roles, responsibilities, and procedure for completing a PTW form.
- Checklist issuance
- CoW Checklist Field Inspection

The PTW documents hazards and mitigations, stop work conditions, Checklists, and the formal agreement by members of the workforce to adhere to the work conditions identified on the PTW.

The collaborative discussion between the Asset Operator / Asset Operator Designee, the Performing Authority, and the workforce drives the completion of the PTW form so that work can be performed safely.

The PTW satisfies the requirements for performing and documenting a Level 1 Risk Assessment.

2. Scope

The scope of this policy covers the identification, assessment and control of hazards, the issuance of the PTW and Checklists and applies to personnel that perform work for USPL. Included in the scope of this policy are the following activities: construction, maintenance, demolition, remediation, operating tasks, manual labor, and other similar work activities.

This policy does not apply to visual inspections, walk-arounds (e.g. visitor tours, non-invasive air monitoring), administrative office work, office and janitorial services, driving, and material delivery services where the driver is only unloading or loading their vehicle.

- A. USPL Control of Work policies shall only apply to external third party work on USPL property when it has the potential to impact USPL operations.

Note: For example, a utility company performs maintenance on a transformer located on USPL property.

- B. BP Control of Work requirements apply to all work performed by the USPL workforce.

The following policies, procedures and programs are applicable to or referenced in this policy.

- Work at Heights
- Confined Space Entry
- Control of Work
- Site-Specific Safety, Health and Environmental Plan (SSHEP) – Contractor Management
- Excavation
- Hot Work
- Lessons Learned
- Lifting and Rigging
- Lockout Program
- Shift Handover
- Level 2 Hazard Identification and Task Risk Assessment (HITRA)
- Working Alone
- Standard Procedures (SP)
- Stop Work
- Work Management Process

3. Minimum Requirements

Minimum Requirements		Supporting Documentation
1.	The Asset Operator / Asset Operator Designee / Performing Authority shall be responsible for the completion of a PTW form for work within the scope of this policy prior to execution.	Section 5 and 10
2.	Simultaneous operations shall be identified by the Asset Operator.	Section 5 and 10
3.	All Checklists shall be issued by an Asset Operator or Asset Operator Designee and shall be received by a Performing Authority. <i>Two people must be involved in the Checklist process.</i>	Section 7
4.	The Asset Operator or Asset Operator Designee (AOD) shall be at the job site to set expectations on the first day for the startup of a contractor job that requires a SSHEP. TL approval shall be required to allow an AOD to set expectations on behalf of the Asset Operator (e.g. at a remote or unmanned location).	Sections 5
5.	CoW Checklist Field Inspections shall be performed for a minimum of 1 Checklist per month per Checklist type for each team unless no Checklists are issued that month.	Section 9
6.	Job site inspections shall be performed by the Performing Authority upon expiration of the PTW.	Section 5 and 10
7.	All BP employees serving in roles defined in this policy shall be trained and certified for their assigned roles as specified in the Training and Competency Matrix.	Section 11
8.	All personnel performing work on behalf of USPL have the responsibility and authority to stop any work they consider to be unsafe.	Section 5

4. Definitions

Asset Operator (AO)—A BP employee who is responsible for the operation of the asset where work is being performed. The Asset Operator shall be accountable for the asset equipment being in a safe condition for the scope of work to be performed. The Asset Operator or an Asset Operator Designee (if used) is responsible for the completion of the PTW form and any associated Checklists.

Asset Operator Designee (AOD)—A BP employee or contractor individual who is authorized to issue PTWs and / or Checklists on behalf of the Asset Operator.

Authorize – The act of the Asset Operator or Asset Operator Designee approving a PTW or Checklist.

Permit to Work (PTW)—An approved management system that controls work in a safe manner through the use of the PTW form (see Appendix I).

Checklist: A Checklist (formerly called a permit) is a formal document used to facilitate a field risk discussion at the job site during the issuing of the Permit to Work. A Checklist highlights a higher than normal risk task and focuses the risk discussion specifically on that task. Types of Checklists are: Confined Space Entry, Hot Work, Excavation, Critical Lift, and Work at Heights.

Checklist / PTW Issuance—The act of the Asset Operator or Asset Operator Designee issuing a Checklist or PTW to a Performing Authority.

Job Site—Within visual proximity of the work being performed.

Level 2 Hazard Identification and Task Risk Assessment (HITRA)—A structured process to identify hazards and specify actions to mitigate the hazards associated with a higher-risk task.

Live equipment – an apparatus, device, material and the like, used as part of, or in connection with energized/in service components or that contains hazardous materials.

Live piping or pipeline—Any piping or pipeline that contains hazardous materials and the valves are open.

Live Plant- can include process equipment and piping that is still in service and connected to the process, or that still contains hazardous materials in quantities that are potentially hazardous to personnel, or that has not been isolated. Examples are pipes, vessels, overhead electrical lines and electrical cables, substations.

On-site—Physically being on the property or within the property fence line where work is being performed.

Performing Authority (PA)—A BP employee or contractor individual who receives a

PTW form or Checklist issued by the Asset Operator or Asset Operator Designee.

Process Hazards – issues that could result in equipment failure or large scale accidental damage to equipment or personnel. Examples include dust, gas or vapor contamination, potential detonation of energetic materials, etc.

Revalidation: When the conditions of a Permit to Work and any applicable Checklists, previously authorized / issued and still valid based on the Maximum Permit Duration listed in Section A, is verified.

Shall—is used where a provision is mandatory.

Should—is used where a provision is preferred.

Simultaneous Operations (SIMOPS)—Separate activities including product movement or work tasks that have the potential to impact each other.

Task Risk Category Table (TRCT): The Task Risk Category Table is used to determine the minimum level of approval required and what types of documentation is necessary to authorize and execute the work. For each task listed in the TRCT, there is a corresponding minimum level of approval and documentation requirement. This is a living document and available in DRM.

Workforce—Any BP employee or contractor who is engaged in performing work on behalf of USPL.

Working Alone—A lone employee or contractor at an unmanned facility (BP or 3rd party), or at other locations such as on the Right-of-Way performing any of the following risk based tasks:

- Performing PTW work except when a PTW is issued by telephone. Refer to the CoW policies for when a PTW can be issued by phone.
- Investigating or responding to an abnormal condition or abnormal operation
- At the discretion of the supervisor or lone worker on a case by case basis if none of the above apply (e.g. adverse weather, working after hours).

5. Roles and Responsibilities

5.1. Asset Operator (AO)

- A. Shall be accountable for the asset equipment being in a safe condition for the scope of work to be performed.
- B. Shall be responsible for the completion of the appropriate sections of the PTW form and any associated Checklists with input from the Performing Authority and the workforce.
 1. Shall confirm that a member of the workforce has visited the job site to identify hazards specific to the job site and shall document those hazards and resulting mitigations on the PTW form as part of completing Section B.
 2. May participate by phone in completion/revalidation of the PTW if no Checklists are involved.
- C. AO shall consult the Task Risk Category Table (TRCT) to ensure compliance with task categorization; shall consult the PPE Matrix to ensure compliance with required PPE; and

- shall consult the table in paragraph 7.1.E of this policy for guidance on the life of the PTW / Checklists.
- D. Shall be accountable to orient contractors to USPL's safety culture and their roles using the Working Safely at USPL tools and materials in the Contractor Management Policy (link: [Contractor Management Policy](#)).
 - E. Shall identify simultaneous operations (SIMOPS) for a facility and/or equipment involved in the scope of work documented on the PTW.
 - 1. If work is performed at a facility owned by a third party or an affiliate, the AO shall contact the third party or affiliate representative to identify SIMOPS.
 - F. Shall identify any conditions that require work to stop.
 - G. Shall issue Checklists to the Performing Authority or can delegate Checklist issuance to the AOD.
 - 1. Shall review and verify that Checklist conditions are deemed acceptable for the defined scope of work and affected equipment.
 - H. Shall review the Level 2 HITRA to verify that it is appropriate for high-risk task in the scope of work., Shall determine if work can continue after notification of a change of scope or task conditions.
 - I. Shall physically identify the specific asset to the Performing Authority and/or AOD as needed depending on his/her judgment of the Performing Authority and/or AOD's knowledge of the asset.
 - J. Shall verify the workforce signs the PTW form, which documents that they understand and agree to perform work within the conditions and requirements listed on the PTW form.
 - K. Shall assure the PTW form is reviewed with new workforce members when they arrive at the job site.
 - L. Shall remain on the job site within visual proximity of the work unless the AO determines that continuous oversight of the work is not necessary based on the level of complexity and risk involved. The following are considered critical activities that require the AO to remain on site:
 - 1. Job kickoff on Day 1 of job.
 - 2. Critical Lift.
 - 3. Excavation entry >20 feet.
 - 4. Work involving a LOTO that requires DOM approval (Hierarchy of Isolation Control).
 - 5. Permitted Checklist work that requires DOM approval of a Level 2 HITRA (highest Residual Risk Level is High).
 - 6. The first day for the startup of a contractor job that requires a SSHEP. TL approval shall be required to allow an AOD to set expectations on behalf of the Asset Operator (e.g. at a remote or unmanned location).
 - M. Request to use an AOD (including CMT AOD) for above activities requires DOM approval (e.g., at a remote or unmanned location).
 - N. Shall verify the asset equipment is properly prepared for return to service upon completion of work.
 - O. Shall store the expired PTW forms, Checklists, and Level 2 HITRAs locally for 30 days, except for Confined Space Entry paperwork (see CSE Policy for storage requirements).

5.2. Asset Operator Designee (AOD)

- A. Shall issue Checklists to the Performing Authority.

1. Shall review and verify that Checklist conditions are deemed acceptable for the defined scope of work and affected equipment.
- B. Shall be responsible for the completion of the appropriate sections of the PTW form with input from the Asset Operator and the workforce if the AO does not serve this role.
 1. Shall confirm that a member of the workforce has visited the job site to identify hazards specific to the job site and shall document those hazards and resulting mitigations on the PTW form.
 2. Orient contractors to USPL's safety culture and their roles using the Working Safely at USPL tools and materials in the Contractor Management Policy (link: [Contractor Management Policy](#)).
- C. Shall contact the Asset Operator before work begins each day or shift to identify simultaneous operations (SIMOPS) that could affect the scope of work to be performed or equipment involved.
 1. Shall document SIMOPS on the PTW form.
 2. If work is performed at a facility owned by a third party or an affiliate, the AOD shall contact the third party or affiliate representative to identify SIMOPS.
- D. Shall verify the workforce understands the scope of work, the specific asset equipment to be worked on, hazards and control measures, and Checklists required as documented on the PTW form if the AO does not serve this role.
- E. Shall verify the workforce signs the PTW form, which documents that they understand and agree to perform work within the conditions and requirements listed on the PTW form.
- F. Shall assure the PTW form is reviewed with new workforce members when they arrive at the job site.
- G. Shall remain on the job site within visual proximity of the work unless the AOD determines that continuous oversight of the work is not necessary based on the level of complexity and risk involved.
- H. The AOD shall establish a method of communication with the PA and the workforce if the AOD leaves the job site.
- I. Shall review the Level 2 HITRA to verify that it is appropriate for high-risk task in the scope of work.
- J. Shall determine if work can continue after notification of a change of scope or task conditions. Shall verify understanding of which specific asset is to be worked on as identified by the Asset Operator.
- K. Shall be at the job site to set expectations on the first day for the startup of a contractor job if the Asset Operator does not serve this role and the AOD is approved by the DOM.
- L. Shall sign the PTW form to verify understanding of Checklist conditions and acceptance of the responsibilities of the AOD.
- M. Shall receive expired Checklists from the Performing Authority(s) and verify that the work written on the Checklist(s) has been completed.
- N. Shall verify the asset equipment is properly prepared for return to service upon completion of work.
- O. Shall return the expired PTW forms, Checklists, and Level 2 HITRAs to the Asset Operator.

5.3. Performing Authority

- A. Shall review the approved Level 2 HITRA and verify they understand the mitigations to be implemented.

- B. Shall assess, or designate a member of the workforce to assess, the workplace for hazards and provide input prior to the PTW completion and work starts.
- C. Shall verify that everyone working under a PTW understands the conditions specified on the PTW and the requirement to stop work if PTW conditions are exceeded or if the scope of work changes.
- D. Shall receive PTW and / or Checklists from the Asset Operator or Asset Operator Designee. If only a PTW is required, the PA may complete the PTW in consultation with the AO.
- E. Shall remain on the job site and monitor work to verify work is performed within the conditions documented on the PTW, Checklist(s), and Level 2 HITRA (if applicable).
- F. Shall review the PTW form with new workforce members when they arrive at the job site.
- G. Shall reassess the work environment and revalidate the conditions on the PTW and Checklist(s) before work can resume if work is interrupted or if the job site is left unattended, or if necessary, cancels the PTW and Checklist(s) and returns them to the AO / AOD.
- H. Shall verify that only personnel authorized by the PTW and/or Checklists participate in the work and that the work is performed within the conditions documented on the PTW and/or Checklist.
- I. Shall keep the job site clean and in a safe condition both during and upon completion of the job, or any time the job site is left unattended.
- J. Shall revalidate PTW and Checklists if they extend beyond 1 day.
- K. Shall verify with a competent member of the workforce that equipment and tools are fit for purpose, free from visible defects or excessive wear, and is within the date of any required formal inspection or certification.
- L. Shall verify the workforce understands the scope of work, the specific asset equipment to be worked on, hazards and control measures, and Checklists required as documented on the PTW form.
- M. Shall contact the AO / AOD at the end of each day, shift, or upon completion of work, whichever comes first, to debrief on work performed and to communicate any lessons identified. If the work concludes after normal work hours, the PA may contact the Asset Operator at the beginning of the next normal work shift to debrief on work performed and to communicate any lessons identified.
- N. Shall perform job site inspections upon expiration of the PTW.

5.4. Workforce Members

- A. Shall participate in the completion of the Hazard Recognition and Mitigation section of the PTW form, and review of the Level 2 HITRA if applicable.
- B. Shall participate in the pre-job tailgate meeting to review key information about the job.
- C. Shall sign the PTW and/or Checklist form to verify they understand the scope of work, hazards identified and associated control measures, and agree to perform work within the conditions and requirements documented on the PTW and/or Checklist form.
- D. Shall execute the scope of work documented on the PTW and applicable Checklists and HITRAs.
- E. Shall keep the job site clean and in a safe condition during and upon completion of work.
- F. Shall stop work and notify the AO / AOD / PA if job site conditions are exceeded as documented on the PTW form, or if anyone feels unsafe or uncertain about any aspect of the job.
- G. Shall communicate lessons learned identified to the AO / AOD / PA.

5.5. Team Leader

- A. Accountable for hiring and training of AODs, with assistance from EPIC and the Learning & Development Team. See Appendix II for the AOD Request Form.
- B. Responsible for determining if an AO or AOD will be used to manage jobs. If AOD, then:
 - 1. Work with the Construction Management Coordinator to determine AOD availability.
 - 2. Verify AOD has issued the type of Checklists that will be needed within the previous 12 months. Contact the Safety Coordinator if recertification of AOD is needed.
 - 3. Accountable to ensure a discussion of the AOD Responsibilities is conducted with the AOD prior to starting work on Day 1 of a job. A copy of the guide should be given to the AOD. See Appendix III for the Asset Operator Designee (AOD) Responsibilities discussion guide.
 - 4. Determine if the AOD can also perform the role of the Inspector based on the scope of work and complexity during the Front End Loading meeting. This is a joint decision by the Operations and Construction Team Leaders.
- C. Accountable to ensure the AO/AOD reviews the Permit to Work Performing Authority (PTW PA) Responsibilities with the PTW PA prior to starting work on Day 1. A copy of the guide should be given to the PTW PA. See Appendix IV for the Permit to Work Performing Authority (PTW PA) Responsibilities discussion guide.
- D. Shall perform active CoW Checklist Field Inspections.
- E. Responsible for completing corrective actions for findings from CoW Checklist Field Inspections in a timely matter.

5.6. CMT Team Leader, Construction Supervisor, (or Designee)

- A. The following are considered critical activities that require this role to be on the job site:
 - 1. Stopple work operations that directly result in plugging the pipeline.
 - 2. Pipeline and station cut-out and tie-in tasks.
 - 3. Nitrogen purge.
 - 4. Excavation entry >20 feet.
 - 5. Job kickoff on Day 1 of job.

5.7. Construction Management Coordinator

- A. If Checklist Issuance is delegated to an Asset Operator Designee (AOD), verifies that the AOD is certified for the type of Checklist(s) to be issued as required by the CoW Training Matrix.

5.8. CoW Evaluator

- A. Perform practical evaluations for Control of Work Roles, as required by the CoW Training Matrix.

6. Task Risk Category

- A. Work tasks are categorized in the Task Risk Category Table (TRCT) showing the relative level of risk and identifying the minimum paperwork and authorization required for each task.
 - 1. When completing PTW Sections C1 and C2, the AO/AOD can not be the PA receiving the PTW.

Risk Category	Minimum Requirements
High Risk	Permit to Work + L2 HITRA+Checklist
Medium Risk	Permit to Work + Checklist
Low Risk	Permit to Work
Minor Risk	Risk assessed procedure

- B. The Task Risk Category Table identifies types of jobs and their assigned level of risk. Jobs not identified on the TRCT should be assigned to the appropriate risk category consistent with potential severity levels of jobs that are listed in the TRCT.

7. Checklist Issuance

One or more of the following five Checklists may be required to perform the scope of work on the PTW form: Confined Space Entry, Critical Lift, Excavation, Hot Work, or Work at Heights. The preparation and issuance of Checklists shall require the collective input of multiple individuals who have specific competencies related to the task. These individuals provide the knowledge required to prepare and issue the Checklist as well as to observe and execute the work within the conditions of the Checklist.

Note: The PTW form, Level 2 HITRA form, and LOTO procedure are not Checklists.

7.1. General Requirements

- A. Completion and issuance of a Checklist shall require a minimum of two people: the Asset Operator/AOD, who issues the Checklist, and a Performing Authority, who receives the Checklist.
1. The Asset Operator or Asset Operator Designee, if applicable, cannot be the Performing Authority for Checklist work. The AO or AOD can be the Performing Authority for the PTW form. *Two people must be involved in the Checklist process.*
 2. The Performing Authority can be part of the workforce executing Checklist work, but, by definition, the Performing Authority shall be the foremost individual who oversees the Checklist work and takes responsibility for verifying that the work is performed within the conditions documented on the PTW and / or Checklist(s).
- B. The Asset Operator / Asset Operator Designee shall review and verify that the Checklist has been prepared and filled out correctly, and that Checklist conditions are appropriate for the work to be performed.
- C. If Checklist conditions are exceeded, work and the Checklist shall be stopped until the Asset Operator / Asset Operator Designee determines if changes can be made to the Checklist or if the Checklist should be cancelled and a new Checklist issued.
- D. A PTW and Checklist(s) can be valid for up to 7 days, or for the duration of the scope of work documented on the Checklist, whichever period is shorter.
- Note:* The risk rank on the TRCT may also affect the duration of the PTW and Checklists.
- E. Each day subsequent to Checklist issuance, the entire Checklist shall be revalidated confirming original conditions have not changed.

TRCT Category	Work Site Visit to issue PTW/Checklists	Revalidation of PTW/Checklist after:	Reissue PTW/Checklist after
High Risk Task (PTW + L2 HITRA + Checklist)	Required	Shift change	24 hours
Medium Risk Task (PTW + Checklist)	Required	Shift change	7 days
Low Risk Task (PTW)	Required	24 hours	7 days

Minor Risk Task (Risk assessed procedure)	Not necessary	Not necessary	Not necessary
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- F. If an individual with an assigned role on a Checklist is replaced during a shift, the incoming replacement shall review the PTW and Checklist and sign the PTW and Checklist for the specific role they are taking over. By signing the PTW and Checklist, the new person is agreeing to fulfill the role and abide by the conditions of the PTW and Checklist that they are signing.
- G. If work is performed at another BP entity facility and USPL workforce is covered by the BP entity's Control of Work process, then USPL Control of Work documents are not necessary.
- H. If work is performed at another BP entity facility and USPL workforce is not covered by the BP entity's Control of Work process, then USPL Control of Work documents are required.

8. Nomination of an Asset Operator Designee

- A. AOD Request Form must be filled out and approved by a District Operations Manager (DOM) for a BP employee or individual contractor to be trained and certified as an AOD (see Appendix III). DOM approval and AOD enrollment for CoW training and certification consists of the following:
 1. The BP Representative shall attach the completed AOD Request Form to an email and send to the appropriate DOM requesting approval for the individual to attend AOD training.
 2. The DOM shall reply via email to the BP Representative and USPLLearningSupport@bp.com with their approval or no approval with explanation.
 3. USPLLearningSupport@bp.com will assign CoW roles in the Learning Management System (LMS) to AOD per DOM approval and enroll AOD in the next CoW training class. The AOD and BP representative will receive an email notification from USPLLearningSupport@bp.com with this information.
 4. Instructions for Certification will be provided to the AOD when they complete their CoW training.

Refer to the Learning Management System for AOD training and certification status.
- B. Any exceptions to the roles of the Asset Operator Designee as stipulated by this policy shall be discussed and agreed to by the DOM.

9. CoW Checklist Field Inspection

9.1. General Requirements

- A. A sampling of active Checklist work shall be audited and documented using the Control of Work Field Inspection Checklist. The type and frequency of Checklists to be audited shall be determined as follows.
 1. At minimum, 1 Checklist of each Checklist type, including PTW and HITRA forms, shall be audited per month for each team.
 2. If there are no Checklists issued for a specific Checklist type, there are no requirements to perform auditing for that Checklist type that month.
 3. The electronic input page, and paper copies of CoW Field Inspection Checklists if needed, can be accessed from the USPL homepage by selecting OMS self-verification,

then scrolling down to 4.5 Control of Work (link: [OMS self-verification field inspection Checklist library](#)).

4. All Checklists to be audited should be active **Checklists** at the job site while work is being performed.
 5. Team Leaders are accountable for completion of Checklist work field inspections.
- B. Checklist field inspections shall be performed by Operations management, HSSE staff, or other certified person who has been trained and deemed competent in the PTW and Checklist policies.

9.2. CoW Checklist Field Inspection

- A. The CoW Checklist Field Inspection shall be completed as follows.
1. Upon arriving at the Checklist job site, notify the AO / AOD and the Performing Authority that you will be auditing the Checklist work activity(s) and that you will provide feedback on your observations after you have completed your auditing.
 2. Review the PTW, Checklist(s), and Level 2 HITRA(s) and interview people involved with the Checklist work to verify their understanding.
 3. Stop any work that is observed to be unsafe, does not have the proper Checklist, or is not being performed as stated on the Checklist.
 4. Upon completion of the CoW Checklist Field Inspection, review the results with the onsite Performing Authority and AO / AOD and enter results in the CoW Checklist Field Inspection.
 5. Review the results with the appropriate Team Leader as soon as practical.

9.3. Findings

- A. Team Leaders are responsible for addressing findings not addressed in the field.

10. Permit to Work (PTW) Form

The PTW form (Appendix I) serves multiple purposes and documents: (1) the scope of work and tasks to be performed; (2) simultaneous operations; (3) conditions that require work to stop and notify the Asset Operator (4) hazards and mitigations; and (5) Checklists issued.

PTW forms can be downloaded online from the Documents and Records Management (DRM) site.

- A. The AO / AOD shall be responsible for the completion of a PTW form for work as required by this policy.
Note: Initial emergency response operations will not require a PTW to be completed prior to completing emergency tasks specified in the Facility Response Plan or Emergency Response Plan. PTWs and any required Checklists shall be prepared prior to conducting work beyond the initial emergency tasks.
- B. One PTW form can be used for work conducted at multiple locations by the same individuals as long as:
1. The scope of work covers all of the tasks to be performed.
 2. Each site is inspected and changes are made to the PTW for each site.
 3. The AO is contacted for each site for SIMOPS.
- C. Refer to the Table in section 7.1.E for guidance reissuing the PTW.

- D. The PTW form can be modified for changes and new Checklists as long as the Hazard Recognition and Mitigation section is updated for changes made.
 - 1. If a change in scope occurs, the PA shall contact the AO / AOD to identify and document any additional SIMOPS and stop work conditions.
 - 2. The AO / AOD shall notify the PA when any changes to the PTW form are made or if the PTW form has been canceled and replaced with a new PTW. The PA will communicate any PTW changes to the workforce.
 - 3. The AO / AOD should cancel the PTW form and replace it with a new PTW if changes or additions are substantial.
 - 4. If the PTW is cancelled during a job, all associated Checklists which are documented on that PTW shall also be cancelled.
- E. All personnel performing work on behalf of USPL have the responsibility and authority to stop any work they consider to be unsafe.
 - 1. If work is stopped, due to unsafe conditions, the PTW form shall be reassessed and updated, or cancelled and a new PTW issued.
- F. The AO/AOD shall create a unique PTW number which should be generated as follows: AO/AOD's initials, MMDDYYR, and a sequential letter for additional PTW forms, e.g., KS101619A, KS101619B, etc.
- G. The PTW can be issued by phone through consultation of the AO with the PA for low risk tasks as listed on the TRCT. Low risk tasks are those that only require a PTW.
- H. The PA shall perform job site inspections upon expiration of the PTW.
- I. The original completed PTW forms shall be retained locally for a minimum of one month, with the exception of the Confined Space Entry forms (see CSE Policy for requirements).

10.1. Section A: General Information

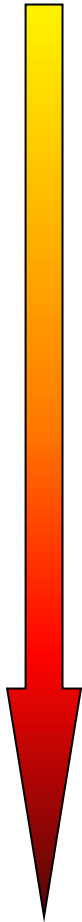
- A. Section A of the PTW form shall be filled out each time a PTW form is completed. Section A documents the general elements of the work to be performed including Date, Location, Asset Operator, Equipment, Scope of Work, maximum duration of the Permit to Work, simultaneous operations and Stop Work conditions.
 - B. If the Asset Operator is replaced during the length of the Permit to Work, the incoming Asset Operator name and phone number shall be added to the PTW form.

10.2. Section B: Hazard Recognition and Mitigation

The purpose of the Hazard Recognition and Mitigation section of the PTW form is to identify potential hazards of the job including the physical job site and tools and equipment to be used, and the control measures needed to eliminate or mitigate these hazards.

- A. The AO / AOD shall confirm that the job site has been inspected by a member of the workforce and facilitate a discussion with the Performing Authority and workforce to identify hazards and mitigations specific to the job site and associated with the work to be performed.
- B. To reduce risk, task risk assessments shall consider the hierarchy of controls in the following order:

Most Effective



Eliminate the hazard

Eliminate a hazard and completely eliminate the associated risk, i.e., conduct task elsewhere, conduct the task during facility turnarounds

If a hazard cannot be eliminated, continue to substitution:

Substitute the hazard with a lesser risk

Substitute something else (a substance, process, or practice) that has less potential to cause harm

If the hazard cannot be eliminated or substituted, continue to engineering controls:

Engineering controls

Use engineering controls to remove a hazard or place a barrier between the workforce and the hazard

If the hazard cannot be mitigated with engineering controls, continue to isolation methods:

Isolate the hazard

Contain the work environment or work process to interrupt the path between the workforce and the risk, e.g., insert blind flange, guards or barriers, set up temporary or permanent enclosures

If isolation methods are not feasible, use administrative controls:

Administrative controls

Reduce the risk through training to assure competency of the workforce, the use of specialist personnel, changing rosters, close supervision, establish policies/standards or procedures such as Checklist policies

If this is not practical, then:

Personal protection equipment

When you can't reduce the risk in any other way, use personal protective equipment (e.g. gloves, goggles,) as a last resort

Least Effective

10.3. Section C1 & Section C2: Hot Work

- A. Section C1 shall be completed to authorize Hot Work limited to PSI Hot Work in a non-Class 1 area.
- B. Section C2 shall be completed to authorize SSI Hot Work in a Class 1 area.

10.4. Section D: Ground disturbance less than 4 feet deep

- A. The section shall be completed to authorize ground disturbance less than 4 feet deep.

10.5. Section E: PTW Validation – Day 1

- A. This section shall be completed to authorize work on day 1.
- B. The PA shall sign their name on the PA signature line thereby accepting the responsibility to oversee the work documented on the PTW form.

- C. The AOD shall sign the signature line thereby accepting and understanding the responsibilities as documented in the AO / AOD statement of acceptance.

10.6. Section F: Workforce Documentation of Understanding and Agreement

- A. The Performing Authority shall print and sign their name in Section E and workforce shall print and sign their name in Section F. By signing the form, the PA and the members of the workforce document their understanding and agreement with the scope of work to be performed, the hazards and controls associated with the work, the specific equipment to be worked on, and their obligation to stop any unsafe work.
 - 1. New workers that arrive at the job site after work begins shall review the PTW with the PA and sign the PTW before they can perform work.
- B. If the PA is replaced during the valid period of the Permit to Work, the oncoming PA shall print and sign their name on the PTW form for their designated role. In signing the PTW, the on-coming PA is agreeing to abide by the conditions of the signature statement for their role.

10.7. Section G: Additional Risk Assessment

- A. This section may be used to identify additional hazards and mitigations that are present on the job and have not already been documented on the PTW form.
- B. If a Stop Work condition arises, the PA should document the Stop Work condition and mitigation in this section to revalidate the PTW prior to starting work again.

10.8. Section H: PTW and Checklist Close out

Section H documents close out of Checklists after they have expired on the PTW. Checklist types include Confined Space Entry, Critical Lift, Excavation, Hot Work, and Work at Heights.

- A. Upon expiration of a Checklist, the PA's signature on the Checklist closes out the Checklist. The PA controlling the Checklist shall then give the Checklist to the PA of the PTW, who will record the Checklist number and date in Section H of the PTW to close out the Checklist on the PTW. The PTW PA shall then return the Checklist to the AO/AOD.

Note: The PA who signs and controls the PTW may or may not be the same PA who signs onto a Checklist.
- B. The AO/AOD shall document the Checklist closure in Section H of the PTW, to close out the Checklist activities.
- C. The AO/AOD shall sign and date the PTW in Section H to close out the permit in its entirety.

11. Training and Competency

- A. All BP employees serving in roles defined in this policy shall be trained as specified in the Training and Competency Matrix.
- B. Employees and contractors serving as the AO / AOD shall complete AO / AOD training and certification.

12. References

- 1. GDP 4.5-0001, BP Group Defined Practice, Control of Work
- 2. D-PRO 4.5-0001, Control of Work and Isolations
- 3. USPL Control of Work Policy
- 4. BP Operating Management System Framework
- 5. OMS Guide, Permit to Work

Appendix I Authorization to Work (PTW) Form

This example of the PTW form is for reference only.

PTW

Permit to Work

PTW -
(AD values: MIN DORY - A)

Section A: General Information	Issue Date		Location (address or cross road)	
	Expiration Date			
	Asset Operator (AO) Name		Scope of Work	
	AO Contact #			
	Medical Facility Name and Address			
	Medical Facility Phone #			
	Emergency Service Phone #			
	Required Checklists and Forms (check all that apply or NA if none apply)	NA <input type="checkbox"/>		
	Confined Space Entry	<input type="checkbox"/>		
	Critical Lift	<input type="checkbox"/>		
	Excavation ≥ 4 ft deep	<input type="checkbox"/>		
	Hot Work PSI	<input type="checkbox"/>		
	Work at Heights	<input type="checkbox"/>		
	Applicable Actions, Policies and Procedures (check all that apply or NA if none apply)	NA <input type="checkbox"/>		
	Approved Lockout Procedure	<input type="checkbox"/>	LOTO #	
Asbestos Competent Person on Site	<input type="checkbox"/>	Work Alone	<input type="checkbox"/>	
Contact Control Center	<input type="checkbox"/>	Call-in Frequency		
Defeated Safety Device	<input type="checkbox"/>	Communication Link		
NFPA 70E Qualified Personnel on Site	<input type="checkbox"/>	Name		
Standard Procedure(s)	<input type="checkbox"/>	Number		
Asset Operator Stop Work Conditions	NA <input type="checkbox"/>	SIMOPS activities impacting work to be performed.	Yes <input type="checkbox"/> No <input type="checkbox"/>	

Energy Sources	Potential Hazards	Mitigation Controls
Body Mechanics <small>(e.g. lifting, pushing, pulling, climbing, positioning, slip/trip hazards)</small>		
Biological <small>(e.g. wildlife, virus or bacteria in sewage systems, drain lines, cooling towers)</small>		
Chemical <small>(e.g. water, methane, nitrogen, process chemicals in gas, liquid, or solid)</small>		
Electrical <small>(e.g. all types of voltage / current, battery systems, static)</small>		
Gravity <small>(e.g. falling/moving objects during lifting tasks, working at heights, dropped objects)</small>		
Mechanical <small>(e.g. moving parts, potential to move, crush, or cut people / vulnerable equipment)</small>		
Noise <small>(e.g. noisy area, tools, or noise impacting communication)</small>		
Pressure <small>(e.g. air, water, pneumatics, spring, gases)</small>		
Radiation <small>(e.g. sunlight, radio waves, radioactivity)</small>		
Thermal <small>(e.g. hot/cold surfaces or fluids, chemical reactions, ambient temperatures)</small>		
Other		

PTW Permit to Work

PTW -
(80 inches MIN DOY - A)



Section B	Overhead power lines present in the work area.	Yes <input type="checkbox"/>	No <input type="checkbox"/>					
	If Yes, what is the line voltage? (minimum safe distances below)							
	<table border="1"> <tr> <td>< 300 V</td> <td>300 V - 50 kV</td> <td>> 50 kV</td> </tr> <tr> <td>3 feet</td> <td>10 feet</td> <td>35 feet + 0.4 inches for every 1 kV above 50 kV</td> </tr> </table>			< 300 V	300 V - 50 kV	> 50 kV	3 feet	10 feet
< 300 V	300 V - 50 kV	> 50 kV						
3 feet	10 feet	35 feet + 0.4 inches for every 1 kV above 50 kV						
If Yes, select the method used to control the hazard.		De-energizing <input type="checkbox"/>	Rerouting <input type="checkbox"/>					
		Goal Posting <input type="checkbox"/>	Spotters <input type="checkbox"/>					
		Signage <input type="checkbox"/>	Grounding <input type="checkbox"/>					
		Other: <input type="text"/>						

Section C1: Hot Work – Primary		NA	<input type="checkbox"/>
Source Ignition Non-Class 1 Area			
Fully charged 20 lbs. minimum fire extinguisher available at job site.			<input type="checkbox"/>
Container cleaned or precautions taken to keep material from being exposed to an ignition source if hot work is performed in or on any container previously containing flammable material.			<input type="checkbox"/>
Mechanical ventilation or supplied air respirators used if welding, cutting, or brazing on hazardous metals (e.g. galvanized, stainless, chrome-moly, metals containing lead beyond impurity).			<input type="checkbox"/>
Name of individual performing fire watch if work performed is within 35 ft of unprotected combustible material.			<input type="checkbox"/>
<input type="text"/>			

Section C2: Hot Work – Secondary		NA	<input type="checkbox"/>
Source Ignition Class 1 Area			
Initial air monitoring conducted.			<input type="checkbox"/>
Continuous air monitoring in place.			<input type="checkbox"/>
Grounding and bonding in place.		Yes <input type="checkbox"/>	
		NA <input type="checkbox"/>	

Section D: Ground Disturbance < 4'		NA	<input type="checkbox"/>
Review IL, alignment sheets and/or drawings.			<input type="checkbox"/>
Complete safety sweep of the area.			<input type="checkbox"/>
Record One-Call (8-1-1) ticket #			<input type="checkbox"/>

Substance	Gas Test Results
Oxygen (19.5% - 23.5%)	
LEL (0%)	
Carbon Monoxide (< 35 ppm)	
H2S (< 10 ppm)	

Substance	Gas Test Results
Benzene (< 1 ppm)	
Ethanol (< 1000 ppm)	
Total Hydrocarbon (< 300 ppm)	

Section E: PTW Validation – Day 1	Review the PTW	Y	NA
	Work site visited	<input type="checkbox"/>	
	Planned work is covered in the work scope	<input type="checkbox"/>	
	Checklists, if any, reviewed and verified	<input type="checkbox"/>	<input type="checkbox"/>
	LOTO verified	<input type="checkbox"/>	<input type="checkbox"/>
	Phone Validation	<input type="checkbox"/>	
	AD / AOD signature authorizing work to proceed	<input type="text"/>	

After discussing the PTW, everyone	
Understands the work scope	<input type="checkbox"/>
Understands the stop work conditions	<input type="checkbox"/>
Understands the hazards	<input type="checkbox"/>
Understands the hazard mitigations	<input type="checkbox"/>
Understands the PPE requirements	<input type="checkbox"/>
Understands the checklist conditions	<input type="checkbox"/>

Workforce: I acknowledge my understanding of the hazard assessment completed on this form and have a clear understanding of the specific equipment involved. I understand my responsibility to abide by all conditions documented on this form, and if applicable, checklists and Level 2 HTRA.

I am responsible to stop any work I believe is unsafe, the scope of work changes, or the PTW / checklist conditions are exceeded.

If I stop work, I shall notify the AD or AOD and PA.

Date	Title	Printed Name	Signature
	PA - Replacement		
	PA - Replacement		
	Workforce Member 1		
	Workforce Member 2		
	Workforce Member 3		
	Workforce Member 4		
	Workforce Member 5		

PTW Permit to Work

PTW -
(KO Initials, MW DOPY - A)




Section G: PTW Revalidation	After reviewing the PTW, Work site visited and conditions are the same Planned work is covered in the work scope SIMOPS are the same LDTO verified Checklists reviewed / revalidated	Day 2 Y N NA	Day 3 Y N NA	Day 4 Y N NA	Day 5 Y N NA	Day 6 Y N NA	Day 7 Y N NA
	After discussing the PTW, everyone Understands the work scope Understands the stop work conditions Understands the hazards Understands the hazard mitigations Understands the PPE requirements Understands the checklist conditions	Day 2 Y	Day 3 Y	Day 4 Y	Day 5 Y	Day 6 Y	Day 7 Y
	Gas Test Results Oxygen (19.5% - 23.5%) LEL (0%) Carbon Monoxide (< 35 ppm) H ₂ S (< 10 ppm) Benzene (< 1 ppm) Ethanol (< 1000 ppm) Total Hydrocarbon (< 100 ppm)	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
	Additional Risk Assessment						
	Hazards			Mitigations			
	AD/ADD Initials Authorizing Work to Proceed Phone validation	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
	PA Initials Authorizing Work to Proceed	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
	Section H: PTW and Checklist Close Out						
	Checklist #	Date Expired	Checklist #	Date Expired	Checklist #	Date Expired	
PTW Closure Date		AD / ADD Signature					

Appendix II

AOD Request Form

This example of the AOD Request Form is for reference only. Blank AOD Request Forms can be downloaded from DRM in the HSSE Policies folder, sub-folder PTW.

Asset Operator Designee (AOD) Request Form

 This form documents the approval for an individual to be trained and certified as an Asset Operator Designee (AOD) for USPL.

General		
This section is to be completed by the BP Representative recommending AOD		
AOD Name: <input style="width: 80%;" type="text"/>		
USPL Employee <input type="checkbox"/>	Contractor <input type="checkbox"/>	
Contractor Information (This section is not applicable if the AOD is a USPL employee)		
Company Name: <input style="width: 80%;" type="text"/>		
Telephone Number: <input style="width: 40%;" type="text"/>	Email Address: <input style="width: 50%;" type="text"/>	
BP Representative (recommending AOD): <input style="width: 80%;" type="text"/>		
AOD Role Assignment		
Select the CoW roles requested for the AOD		
PTW AOD	Yes <input type="checkbox"/>	No <input type="checkbox"/>
L2 HITRA Leader	Yes <input type="checkbox"/>	No <input type="checkbox"/>
O&M Shift Leader	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Hot Work Checklist AOD	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Category 3 Critical Lift Checklist AOD	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Excavation Checklist AOD	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Confined Space Entry Checklist AOD	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Work at Heights Checklist AOD	Yes <input type="checkbox"/>	No <input type="checkbox"/>
DOM Approval		
<ol style="list-style-type: none"> The BP Representative shall attach this form to an email and send to the appropriate District Operations Manager (DOM) requesting approval for the individual to attend AOD training. The DOM shall reply via email to the BP Representative and USPLLearningSupport@bp.com with their approval or no approval with explanation. 		
DOM Name: <input style="width: 80%;" type="text"/>		

AOD Training and Certification

- USPLLearningSupport@bp.com will assign CoW roles in the Learning Management System (LMS) to AOD per DOM approval and enroll AOD in the next CoW training class. The AOD and BP representative will receive an email notification from USPLLearningSupport@bp.com with this information.
- Instructions for Certification will be provided to the AOD when they complete their CoW training.

Appendix III

Asset Operator Designee (AOD) Responsibilities

AOD Responsibilities forms can be downloaded from DRM in the HSSE Policies folder, sub-folder PTW.

Asset Operator Designee (AOD) Responsibilities

Asset Operator Designee Shall:

- Issue Control of Work Checklists on behalf of the Asset Operator (AO).
- Contact the AO before work begins each day or shift to identify simultaneous operations (SIMOPS) that could affect the scope of work to be performed or equipment involved and document in Section A of the PTW.
- Confirm that a member of the workforce has visited the job site to identify hazards specific to the job site and shall document those hazards and resulting mitigations on the PTW form as part of completing Section B.
- Verify with a competent member of the workforce that equipment and tools are fit for purpose, free from visible defects or excessive wear, and is within the date of any required formal inspection or certification.
- Verify understanding of which specific asset is to be worked on as identified by the Asset Operator.
- Verify that permit conditions are deemed acceptable for the defined scope of work and affected equipment.
- Review the Level 2 HITRA to verify that the scope is appropriate, permits have been identified, and that it has been properly approved.
- Ask everyone to think/ask What is Your (My) Exposure (WYE) before performing a task to identify and eliminate hazards and exposures in the work area to prevent potential hand injuries, slips, trips, falls, etc.
- If you See Something that is not right, Say Something and Do Something about it.
- Prioritize work and do not let other activities/distractions prevent you from focusing on your primary task at hand.
- Stop work and notify the AO if PTW/Checklist conditions are exceeded, job scope changes and/or encounter any unsafe conditions.
- Verify the workforce understands, agrees and signs the PTW form, which documents the scope of work, the specific asset equipment to be worked on, hazards and control measures, and permits required as documented on the PTW form.
- Sign the PTW form to verify they understand the permit conditions and their responsibilities as an AOD.
- Verify that the mitigations documented on the PTW and Level 2 HITRA are implemented.
- Determine if changes can be made to a Checklist if Checklist conditions are exceeded, or if the Checklist should be cancelled and a new Checklist issued. Approve changes by initialing the changes on the Checklist.
- If changes to the Level 2 HITRA are necessary, contact the HITRA Leader for review and approval..
- Remain on the job site within visual proximity of the work unless continuous oversight of the work is not necessary based on the level of complexity and risk involved.
- Report all incidents and near miss events to the AO.
- Establish a method of communication with the Performing Authority (PA) and the workforce if the AOD leaves the job site.
- If there is a change in the PTW PA, review the role and responsibilities with the new PTW PA and ensure they understand the PTW PA responsibilities before they sign the PTW.
- Receive expired checklists from the Performing Authority(s) and verify that the work written on the Checklist(s) has been completed.
- Verify the asset equipment is properly prepared for return to service upon completion of work.

Key Definitions:

Revision Date: 05/01/2020

Next Review Date: 05/01/2025

Effective Date: 06/30/2020

The controlled version of this document can be found in DRM in the HSSE Policies folder.

Asset Operator (AO)—A BP employee who is responsible for the operation of the asset where work is being performed. The Asset Operator shall be accountable for the asset equipment being in a safe condition for the scope of work to be performed. The Asset Operator or an Asset Operator Designee (if used) is responsible for the completion of the PTW form.

Asset Operator Designee (AOD)—A BP employee or contractor individual who is authorized to issue PTWs and / or Checklists on behalf of the Asset Operator.

Job Site—Within visual proximity of the work being performed.

Level 2 Hazard Identification and Task Risk Assessment (HITRA)—A structured process to identify hazards and specify actions to mitigate these hazards for a permitted work activity or task.

On-site—Physically being on the property or within the property fence line where work is being performed.

Performing Authority (PA)—A BP employee or contractor individual who receives an PTW form or Checklist issued by the Asset Operator or Asset Operator Designee.

Shall—is used where a provision is mandatory.

Appendix IV

Permit to Work Performing Authority (PTW PA) Responsibilities

PTW PA Responsibilities forms can be downloaded from DRM in the HSSE Policies folder, sub-folder PTW.

Permit to Work Performing Authority (PTW PA) Responsibilities

PTW Performing Authority Shall:

- Ensure the hazards and mitigations documented on the **PTW** and the Level 2 HITRA (if applicable) are understood and implemented.
- Verify that the workforce understands the scope of work and the specific equipment to be worked on particularly if similar equipment exists that looks alike.
- Everyone is responsible for verifying that hazardous energy has been isolated and controlled through an approved Lock-Out-Tag-Out (LOTO) procedure before work can begin.
- Ask everyone to think/ask What is Your (My) Exposure (WYE) before performing a task to identify and eliminate hazards and exposures in the work area to prevent potential hand injuries, slips, trips, falls, etc.
- If you See Something that is not right, Say Something and Do Something about it.
- Prioritize work and do not let other activities or distractions prevent you from focusing on your primary task at hand.
- Verify that only personnel authorized by the **PTW/Checklist** participate in the associated work.
- Remain on the job site and monitor work to verify work is performed within the conditions documented on the **PTW, Checklists(s)**, and Level 2 HITRA (if applicable).
- Review the **PTW** with new workforce members when they arrive at the job site.
- Reassess the work environment and revalidate the conditions on **PTW** and **Checklist(s)** before work can resume if work is interrupted or if the job site is left unattended.
- Stop work and notify the AO / AOD if **PTW/Checklist** conditions are exceeded, job scope changes and/or encounter any unsafe conditions.
- Report all incidents and near miss events to the AO / AOD.
- Keep the job site clean and in a safe condition both during and upon completion of the job.
- Document the **expiration date** on the PTW form in **Section 6**.
- Contact the AO / AOD at the end of each day, shift, or upon completion of work, whichever comes first, to debrief on work performed and to communicate any lessons identified. If the work concludes after normal work hours, the PA may contact the AO at the beginning of the next normal work shift.

Key Definitions:

Asset Operator (AO)—A BP employee who is responsible for the operation of the asset where work is being performed. The Asset Operator shall be accountable for the asset equipment being in a safe condition for the scope of work to be performed. The Asset Operator or an Asset Operator Designee (if used) is responsible for the completion of the **PTW** form.

Asset Operator Designee (AOD)—A BP employee or contractor individual who is authorized to issue **PTWs and / or Checklists** on behalf of the Asset Operator.

Job Site—Within visual proximity of the work being performed.

Level 2 Hazard Identification and Task Risk Assessment (HITRA)—A structured process to identify hazards and specify actions to mitigate these hazards for a permitted work activity or task.

On-site—Physically being on the property or within the property fence line where work is being performed.

Performing Authority (PA)—A BP employee or contractor individual who receives an **PTW** form or **Checklist** issued by the Asset Operator or Asset Operator Designee.

Shall—is used where a provision is mandatory.

Appendix V

Additional Sign in Sheet (available to download in DRM)

PTW

Permit to Work

PTW -
(AO / AOD, MIN COPY - A)

Workforce: I acknowledge my understanding of the hazard assessment completed on this form and have a clear understanding of the specific equipment involved. I understand my responsibility to abide by all conditions documented on this form, and if applicable, checklists and Level 2 HITRA.

I am responsible to stop any work:

- I believe is unsafe
- If the scope of work changes
- If PTW / checklist conditions are exceeded

If I stop work, I shall notify the AO or AOD and PA.

Date	Worker	Printed Name	Signature
	Workforce Member 6		
	Workforce Member 7		
	Workforce Member 8		
	Workforce Member 9		
	Workforce Member 10		
	Workforce Member 11		
	Workforce Member 12		
	Workforce Member 13		
	Workforce Member 14		
	Workforce Member 15		
	Workforce Member 16		
	Workforce Member 17		
	Workforce Member 18		
	Workforce Member 19		
	Workforce Member 20		
	Workforce Member 21		
	Workforce Member 22		
	Workforce Member 23		
	Workforce Member 24		
	Workforce Member 25		
	Workforce Member 26		
	Workforce Member 27		
	Workforce Member 28		
	Workforce Member 29		
	Workforce Member 30		
	Workforce Member 31		
	Workforce Member 32		
	Workforce Member 33		
	Workforce Member 34		
	Workforce Member 35		
	Workforce Member 36		
	Workforce Member 37		
	Workforce Member 38		

