

Site Safety, Health, and Environmental Plan (SSHEP) Procedure

1. Purpose

The Site Safety, Health and Environmental Plan (SSHEP) is a planning tool completed and submitted electronically by the contractor for review by the Person Responsible for Contracted Work (PRCW) and Health, Safety, Security, and Environment (HSSE) as an efficient means to assess whether contractors are aligned with the project work plan and prepared to conduct work in compliance with BP USPL HSSE Policies and Procedures.

Common deficiencies that prevent contractors from proceeding with work are:

- Non-compliance with USPL HSSE Policies or Procedures because the contractor is not familiar with them or understands when they apply to the work they perform.
- Contractor assigns persons to work crew that do not have the right competencies for the work they will perform.
- Use of a subcontracted company or trades person that has not been pre-approved for work to be performed.
- Failure to produce Safety Data Sheets for chemicals used in their work.

2. Scope

This procedure applies to all contractors performing field work including field maintenance, operations and construction performed on BP US Pipeline and Logistics (USPL) assets and facilities and at a non USPL-controlled premise when commissioned and/or managed by USPL as may be the case in third party terminals, refineries, tank farms or green fields. Excluded from the scope of this procedure are contractors with little or no field exposure such as:

- Office based consultants and administrative office support,
- Consultants or contractors conducting a site visit for purpose of performing a land, engineering, or wetland survey, participating in a meeting, or attending a pre-bid job walk,
- SCADA programmers; satellite system programmers,
- Offsite valve, pump, motor rebuilders,
- Material suppliers and their technical advisors,
- Third party carriers (e.g. Fed-Ex), water or other delivery services
- Certain fungible contractors providing minor facility services (e.g., janitorial services, lawn maintenance), and,
- Contractors that represent BP USPL in field work and are directly supervised by BP personnel (e.g. Job Inspector, Asset Operator Designee, or Construction Lead).

The following policies are applicable to or are referenced in this procedure:

Contractor Management Policy	R&M Projects common process
Control of Work (CoW) Policy	Work Management Policy
USPL Engineered Modification Small Projects Policy	Operator Qualification website

Revision Date: December 1, 2020

Effective Date: January 1, 2021

Next Review Date: December 1, 2025

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.

3. Minimum Requirements

	Minimum Requirements	Supporting Documentation
1.	The SSHEP shall be submitted in the Contractor's bid package or, if work is not subject to a bid process, the work shall not be awarded until the SSHEP has been received, reviewed and accepted.	Section 6.1
2.	The PRCW shall be responsible for receiving the SSHEP and any supporting documentation. It shall be reviewed by the PRCW for completeness and accuracy of content, followed by an HSSE review. Both the PRCW and HSSE reviewer(s) shall agree to accept the SSHEP submitted before work can proceed. Accepted SSHEPs require the PRCW and HSSE reviewer's signature and date on the bottom of the SSHEP form.	Section 6.1
3.	Primary contractors shall verify their subcontracted companies meet BP USPL contractor selection requirements (CSR) and provide documentation of their subcontractor's safety performance with the SSHEP to the PRCW for review and verification. Any requested deviations from the CSR shall require USPL Contractor Management/Operations Network approval prior to the subcontractor starting work.	Section 6.1
4.	The Contractor shall include in the SSHEP, contact information for persons within their company required to initiate the incident notification procedure and provide injury case management if needed.	Section 6.2
5.	The Contractor shall include in the SSHEP, a Detailed Job Plan that adequately describes tasks and major equipment needed to complete work, anticipated USPL CoW checklists, and any applicable license, certificates, or DOT Operator Qualifications for contractor employees assigned to the task.	Section 6.2
6.	The Primary Contractor shall identify subcontractors in their SSHEP or indicate that the subcontractor will submit their own SSHEP. If the subcontractor is included in the Primary Contractor's SSHEP, then the document shall also describe work the subcontractor will perform.	Section 6.2
7.	The Primary Contractor shall identify in the SSHEP chemicals or products that will be brought onsite, their quantity and any special handling requirements. Safety Data Sheets shall be made available at a designated location at the work site.	Section 6.2
8.	If requested by the PRCW or HSSE, the Primary Contractor and subcontractors (if applicable) shall provide to USPL, copies of any applicable Safety Programs or Job Hazard Analysis prepared by the contracting company for the work scope.	Section 6.2
9.	The Primary Contractor shall immediately notify the PRCW if the scope of work changes or a new subcontractor will be added after work begins. The PRCW will contact HSSE to review the proposed change(s) and determine whether additional measures are warranted. Agreed changes shall be communicated through electronic transmittals of the SSHEP. Newly added subcontracted companies shall not be allowed to initiate work until the documentation supporting their health, safety, and environmental performance is provided, reviewed and approved.	Section 6.2
10.	To ensure that the SSHEP Procedure maintains OMS 2.5 Contractor Management Level 5 conformance, HSSE shall conduct annual desktop validation audits of contractor SSHEP submittals.	Section 7.1

4. Definitions

Contractor	A company who contracts to perform work in the field involving maintenance, construction or operations activities. Unless otherwise specified, the term "Contractor" applies to both primary and sub-contractors.
Contractor Selection Requirements (CSR)	A contractor company's statistical OSHA data, Workers' Compensation experience modification rate, anti-drug and alcohol program, and safety programs based on services provided to BP. Specialized Contractors and trade union workers are not subject to contractor selection requirements.
Contractor Management/ Operations Network (CMON)	A cross-discipline group that provides a standardized evaluation methodology for USPL contractors falling below safety expectations and the contractor selection requirements. The network consists of one representative from each of the following disciplines: Procurement, Operations, Projects, Construction, and Health and Safety. The network is convened by the Contractor Management Coordinator.
Covered Task	An activity that (a) is performed on a pipeline or terminal facility subject to U.S. Department of Transportation (DOT) jurisdiction and (b) is an Operations or Maintenance task and (c) is required by Part 192 or Part 195; and (d) affects the operation of integrity of the pipeline.
Documentation of HSE Performance	Documented proof of Experience Modification Rate (EMR) and Total Recordable Injury Rate (TRIR) in the form of a current letter from the employer's workman's compensation insurer or agency for EMR and previous three years of OSHA 300/300A forms for TRIR calculations.
DOT Operator Qualification	An individual who has been evaluated and is able to perform activities identified as Covered Tasks and responds to abnormal operating conditions that may be encountered while performing these activities.
Field work	Operations, maintenance, or construction activities performed on BP USPL assets and facilities and at a non-BP USPL-controlled premise where the work is under the direct control, supervision and contract with USPL as may be the case in third party terminals, refineries, tank farms or green fields.
Fungible Contractor	Contractors that provide low risk general maintenance services at USPL facilities and are managed locally (e.g. janitorial services, lawn maintenance, satellite maintenance). See USPL Contractor Management Policy for the complete list of fungible tasks.
Job Hazard Analysis	Risk assessment tool used by employers to identify and control workplace hazard. It may also be known as Job Safety Analysis (JSA) or Job Safety and Environmental Analysis (JSEA)
Major Equipment	Equipment that requires a certificate, license, or work checklist to operate, eg. Excavator, Hydrovac, Crane, Forklift, Aerial Lift, Abrasive Blaster, Scaffolding, etc.
Person Responsible for Contracted Work (PRCW)	USPL employees such as, but not limited to, Project Manager, Engineer, Terminal Manager, Team Leader, Asset Operator, or Technician who hires contractors to perform field work.
Primary contractor	Company retained to execute a scope of work involving the use of a sub-contractor.
Safety Data Sheet (SDS)	Provides workers and emergency personnel with procedures for handling or working with substances in a safe manner and includes information such as physical data, toxicity, health effects, first aid, reactivity, storage, disposal, protective equipment and spill-handling procedures.
Site Safety, Health, and Environmental Plan (SSHEP)	BP USPL project planning document prepared by a Contractor used to ensure that the Contractor is aligned with the HSSE Management Plan and BP USPL Policies and Processes.

Specialized Contractor	Specific individual(s) from a contracting company who perform work at a site(s) on a regular basis. Examples are electricians who support and maintain terminal and pipeline electrical systems and Asset Operator Designees for Control of Work support.
Subcontractor	A non-BP entity retained to perform an operations or engineering scope of work under the direction of the primary contractor. This may include a member of a trade union.

5. Roles and Responsibilities

5.1. Contractor shall

- A. Prepare and submit SSHEP to the PRCW in accordance with this procedure.
- B. Verify that proposed subcontracted companies meet contractor selection requirements as described in USPL Contractor Management Policy and provide supporting documentation as evidence to the PRCW. If the subcontractor is a member of ISNetworld and their account is complete with current safety statistics and safety programs, an account number may be provided on the SSHEP in place of submitting documents.
- C. Provide to subcontractors, USPL policies and procedures relevant to the work they will perform.
- D. Submit to the PRCW, Safety Data Sheets (SDS) for chemicals to be used on the jobsite. SDS shall be submitted with the SSHEP.
- E. Notify the PRCW if the scope of work changes or a new subcontractor will be added after work begins. An electronic resubmittal of the SSHEP is acceptable.
- F. Not proceed with work or allow subcontractors to begin work until authorization is provided by the PRCW.

5.2. Persons Responsible for Contracted Work shall

- A. Provide to Contractors a Scope of Work, Project Contact List, ISNetworld JS Number for any DOT work involving covered tasks, and tentative work start date.
- B. Receive and review Contractor's SSHEP for completeness and accuracy of its content and verify that proposed subcontracted companies meet contractor selection requirements.
- C. Submit SSHEP to HSSE for review.
- D. Resolve with the contractor any deficiencies discovered in the HSSE review.
- E. Verify acceptance of the SSHEP by signing and dating the document and obtaining HSSE acceptance by evidence of HSSE signature and date before authorizing work to proceed.
- F. Arrange to provide to Contractor, SDS for chemicals inherent to the jobsite.
- G. Authorize work to proceed.
- H. The PRCW shall forward a copy of the accepted SSHEP to the Construction Lead and the asset's Planner/Scheduler, Team Leader/Terminal Manager, Asset Operator/Technician, Safety Coordinator, and Environmental Coordinator.
- I. Contact HSSE to evaluate newly added subcontractors or work scope changes occurring during execution of field work to determine whether additional HSSE measures are warranted in consideration of the changes. An electronic communication from the PRCW is acceptable.
- J. Upon acceptance of changes by HSSE, authorize Contractor to proceed with work.

5.3. HSSE shall

- A. Review Contractor's SSHEP and advise PCRW of any HSSE deficiencies to be resolved prior to authorizing work to proceed.
- B. Advise PCRW if SSHEP is accepted by affixing signature and date to the document.
- C. Evaluate newly added subcontractors or work scope changes and advise PCRW if any additional HSSE measures are warranted.

6. SSHEP Requirements and Procedure

6.1 General Requirements

- A. The SSHEP shall be submitted in the Contractor's bid package or, if work is not subject to a bid process, submitted directly to the PCRW. The work shall not be awarded until the SSHEP has been received, reviewed and accepted.
- B. The PCRW shall be responsible for receiving the SSHEP and any supporting documentation. It shall be reviewed by the PCRW followed by an HSSE review. Both the PCRW and HSSE reviewer(s) must agree to accept the SSHEP submitted. Accepted SSHEPs require the PCRW and HSSE reviewer's signature and date on the bottom of the SSHEP form. Electronic signatures are acceptable.
- C. Primary contractors shall verify their subcontracted companies meet USPL contractor selection requirements as described in the Contractor Management Policy and provide documentation of subcontractors' health, safety, and environmental performance with their SSHEP to the PCRW for review, verification, and approval. The contractor shall provide the following performance information for each proposed subcontracted company:
 - a. Three-year average Total Recordable Incident Rate (TRIR) as evident by OSHA 300/300A records for the last three years.
 - b. Current year Workers' Compensation Experience Modification Rate (EMR), supported by a letter from the company's workers' compensation carrier.
 - c. Statement attesting no fatalities within the past three years.

If the subcontractor is a member ISNetworld (ISN) and their account is complete with current safety statistics and safety programs, then the primary contractor may provide the subcontractor's ISN account number on their SSHEP for BP's reference in lieu of document submittals.

- D. Subcontracted companies that have less than three years of TRIR statistics or do not have an EMR, or if a subcontractor does not meet USPL Contractor Management selection performance thresholds shall not be allowed to work unless approval is granted by the CMON. The CMON's approval authorizes only the work described in the SSHEP that is presented for their consideration and shall not be extended to additional scopes of work or other projects without their written consent.
- E. Specific individual(s) from a contracting company that perform the same work throughout the year at one or multiple locations and do not subcontract any services may submit one SSHEP to the PCRW which will be valid for the calendar year. Examples of contractors in this category include electricians dedicated to long-term assignments in a facility or contract members of USPL's Construction Maintenance Team. The PCRW may, at any time, request a project specific SSHEP from the specific individual.

6.2 Procedure

- A. PRCW shall request the Contractor to prepare a SSHEP and provide to them a Scope of Work, Project Contact List, ISNetworld JS Number for any DOT covered tasks, and tentative work start date.
- B. The Contractor shall develop the SSHEP on the BP USPL SSHEP form available on the USPL Contractor's website: https://www.bp.com/en_us/united-states/home/products-and-services/pipelines/contractor-information.html or ISNetworld Bulletin Board.
- C. The Contractor shall include in the SSHEP, contact information for persons within their company required to initiate the Incident Notification Procedure and provide injury case management if needed.
- D. The Contractor shall develop a Detailed Job Plan that adequately describes tasks and major equipment needed to complete the scope of work, anticipated USPL CoW checklists, and any applicable license, certificates, or Operator Qualifications for contractor employees assigned to the task.
- E. The Primary Contractor shall identify subcontractors in their SSHEP or indicate that the subcontractor will submit their own SSHEP. The Primary Contractor shall receive and review a subcontractor prepared SSHEP and then provide it to the PRCW. If the subcontractor is included in the Primary Contractor's SSHEP, then the document shall also describe work the subcontractor will perform, any major equipment they will use, and any applicable license, certificates, or Operator Qualifications required to perform their tasks.
- F. The Primary Contractor shall identify when supplemental craftsmen will be used by providing the name of the labor union and related trade or expertise of hired individual(s) in the SSHEP form.
- G. With the SSHEP, the Primary Contractor shall provide to the PRCW, the subcontracted company's documentation supporting their reported EMR in the form of a current letter from the employer's workman's compensation insurer and previous three years of OSHA 300/300A forms for TRIR calculations. The Contractor shall also confirm whether the subcontractor had any fatalities occur in the past 3 years. If the subcontractor is a member of ISNetworld and their account is complete with current safety statistics and safety programs, then the primary contractor may provide their ISNetworld account number on the SSHEP for BP's reference in place of document submittals. Contractor selection requirements and related documentation is not applicable for members of trade unions.
- H. The Primary Contractor shall disclose in the SSHEP, the method they used to verify the subcontractor's craft and safety training (e.g. an internal safety programs review or an ISNetworld safety programs review) and the level of supervision (e.g. none, part time, or full time) that the Primary Contractor proposes to provide to subcontractors.
- I. The Contractor shall identify in the SSHEP chemicals that will be brought onsite, their quantity and any special handling requirements and provide their SDS. The PRCW shall arrange to provide to the contractor, SDS for chemicals inherent to the job location.
- J. If requested by the PRCW or HSSE, the Primary Contractor and subcontractors (if applicable) shall provide to USPL, copies of any applicable Safety Programs or Job Hazard Analysis prepared by the contracting company for the work scope.
- K. The PRCW shall receive the SSHEP and any supporting documentation. It shall be reviewed by the PRCW followed by an HSSE review. Both the PRCW and HSSE reviewer(s) must agree to accept the SSHEP submitted by signing their names and date of acceptance in the Acceptance Box on the last page of the SSHEP form.
- L. The Primary Contractor shall immediately notify the PRCW if the scope of work changes or a new subcontractor will be added after work begins. The PRCW will contact HSSE to review the proposed change(s) and determine whether additional HSSE measures are warranted. Agreed changes shall be communicated through electronic transmittals of the SSHEP. Newly added subcontracted companies shall not be allowed to initiate work until the documentation supporting

their contractor selection requirements is provided, reviewed and approved. The PRCW shall authorize work to proceed upon acceptance of the SSHEP and any revisions to it.

- M. The PRCW shall forward a copy of the accepted SSHEP to the Construction Lead and the asset's Planner/Scheduler, Team Leader/Terminal Manager, and assigned Asset Operator/Technician, Safety Coordinator, and Environmental Coordinator.
- N. Work shall be scheduled by the asset's Planner/Scheduler.

7. Self-Assurance

7.1 SSHEP Procedure Audits

To ensure that the SSHEP Procedure maintains OMS 2.5 Contractor Management Level 5 conformance, HSSE shall conduct annual desktop validation audits of contractor SSHEP submittals. Each audit shall survey a minimum of ten random SSHEPs from at least five contractors. The following items shall be examined:

- A. Completeness of incident notification contact information.
- B. Control of Work checklists are correctly identified for the described tasks in the Detailed Job Plan.
- C. Verification that subcontractors meet USPL Contractor Selection Requirements when applicable. If a subcontractor does not meet selection requirements, it will be confirmed whether a variance from the Contractor Management Policy was approved by the CMON prior to starting work.
- D. SSHEP form is signed and dated by both the PRCW and HSSE. The date of PRCW and HSSE acceptance shall be prior to the work start date shown on the SSHEP.
- E. Audit findings shall be compiled and communicated to the HSSE Manager.

7.2 Audit Deficiencies

The HSSE auditor shall communicate deficiencies discovered in an audit to the HSSE Manager and appropriate PRCW for corrective action as needed.

8. Procedure Review

The SSHEP Procedure shall be reviewed with the Contractor Management Policy.

Appendix I

SSHEP Form

This example of the SSHEP form for reference only. For a downloadable version of the form, go to the USPL Contractors Website at https://www.bp.com/en_us/united-states/home/products-and-services/pipelines/contractor-information.html

Site Safety, Health & Environmental Plan					
Company Name: _____		Location: _____		Work Start Date: _____	
Project Name: _____		Cell: _____		E-mail: _____	
BP PRCW: _____		Phone: _____		ISN JS # _____	
Incident Notification Contractor employees must immediately notify the BP USPL Site Contact and Contractor Work Site Supervisor of any injury or illness sustained while performing work in the BP environment. They must follow their employer's medical treatment policies and plans in the event of an injury or illness. Contractor companies shall provide their own case management for their employees' medical situation and return-to-work status.					
BP USPL Site Contact: _____			Contractor Work Site Supervisor: _____		
Phone: _____ Cell: _____ E-mail: _____			Phone: _____ Cell: _____ E-mail: _____		
Contractor Injury Case Manager: _____			Workman's Compensation/Claims Contact: _____		
Phone: _____ Cell: _____ E-mail: _____			Phone: _____ E-mail/Fax: _____		
Detailed Job Plan Describe, in steps, work to be performed.		Major Equipment Needed for Task eg. Crane, Manlift	Subcontracted Task (company name)	USPL Control of Work Checklist(s)*	Certificate, License Required**
1. _____					
2. _____					
3. _____					
4. _____					
5. _____					
6. _____					
7. _____					
8. _____					
9. _____					
10. _____					
Detailed Job Plan example: 1. Kick off job with BP USPL Representative. 2. Review LOTO of equipment and verify Zero Energy state with BP USPL Operations. Crew to apply individual locks & tags. 3. Remove existing floating roof seals 4. Demo existing floating roof 5. Remove existing steam coils and floating roof drain system 6. Build new steel back slope pontoon floating roof 7. Install new secondary and primary seals 8. Re-install floating roof drain system and steam coils 9. Misc. repairs and modifications to put tank back into service		* Select the CoW checklists that apply to the work described in the Detailed Job Plan. Checklist requirements will be validated prior to starting work. USPL HSSE Policies can be viewed on ISNetworld > Messages > Bulletin Board or on the USPL Contractor website. PTW Only = Permit to Work (Level 1 HITRA) Select "PTW Only" if no other checklists are applicable. CS = Confined Space DP = Demolition / Decommissioning Plan EX = Excavation HW-PSI = Hot Work - Primary Source Ignition LFT = Category 2 or 3 Lift WH = Working at Heights ** List certificates or licenses required to perform task, e.g. Crane Operator, Rigger, Forklift Operator, DOT OQs, etc.			

Page 1 of 2

Form Revision Date: September 1, 2020

Subcontractor and Supplemental Craftsman Utilization/Information										
All subcontractors shall meet the minimum contractor selection requirements set by USPL: current year EMR ≤ 1.04, three-year average TRIR ≤ 2.0 and no fatalities in past three years. Documentation as evidence including OSHA 300 and 300A logs for the last three years and a current letter from the workers' compensation insurer/state agency or an active ISNetworld account number must be provided to the BP Person Responsible for Contracted Work (PRCW) and HSSE for formal review prior to work being awarded. Evidence of training, certification and licensure for subcontractors and any craftsman not directly employed by your company that is performing work on your behalf must also be provided to the BP USPL Representative prior to the commencement of work they perform.										
Contractor Name or Labor Union	Trade/Area of Expertise	Method Contractor will use to identify and verify craft/safety training	ISNetworld Account Number (if applicable)	Level of Supervision required	Will the Subcontractor prepare their own SSHEP?	Current Year EMR	TRIR 20	TRIR 20	TRIR 20	Check box if no fatalities in past 3 yrs.
					YES NO					
					YES NO					
					YES NO					
					YES NO					
Hazard Communication • Plan for communicating the hazards of the chemicals you bring on site, including pre-job or pre-task review of chemicals used, and required precautions and PPE for specific chemicals. • Safety Data Sheets (SDS) that detail flammability, toxicity, exposure limits, environmental, etc. of each product listed below shall be made available to employees and BP USPL for review prior to starting work. All job specific SDS must be present on-site for chemicals used at the job site. • Upon request, BP USPL shall provide copies of SDS to Contractor for review of any process chemical hazards which may be present in the work area. • If inhalation (breathing) exposures are likely from gases (e.g. Hydrogen Sulfide), vapors (e.g. benzene), welding fume (e.g. hexavalent Chromium), or particulate (e.g. lead), data from jobs with similar exposures must be provided along with the respiratory protection to be used. If data is not available, exposure monitoring must be performed (at no expense to BP) during the job with employees using SCBA or supplied air until data is available for respirator selection.										
Chemical/Product Name		Special Handling - Add notes or comments for each							Estimated Quantity (eg. gal/pounds)	
1. _____										
2. _____										
3. _____										
4. _____										
5. _____										
6. _____										
7. _____										
8. _____										
9. _____										
10. _____										

Work shall not proceed until SSHEP is accepted as verified by signature below.

I have reviewed and accepted the Contractor SSHEP.

BP USPL HSSE (print): _____ Signature: _____ Date: _____

BP USPL PRCW (print): _____ Signature: _____ Date: _____

Page 2 of 2

Form Revision Date: September 1, 2020

Revision Date: December 1, 2020

Effective Date: January 1, 2021

Next Review Date: December 1, 2025

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.