Authorization to Work

1. Purpose

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

- Key roles and responsibilities for Control of Work.
- Roles, responsibilities, and procedure for completing an ATW form.
- Permit issuance
- Permit register
- Permit work auditing

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

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

The ATW 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 permits 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.

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

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

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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 ATW form.

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

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

**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.

**Permit Register**—A log for recording the status of permits.
Performing Authority (PA)—A BP employee or contractor individual who receives an ATW form or permit issued by the Asset Operator or Asset Operator Designee.

Permit Issuance—The act of the Asset Operator or Asset Operator Designee issuing a permit to a Performing Authority.

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.

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 permit work except when a permit is issued by telephone. Refer to the permit policies for when a permit 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 ATW form 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 ATW form as part of completing Section B.
   2. May participate by phone in completion of the ATW (after the first day) if no permits are involved. Consideration should be given to how similar the scope of work is in subsequent days.

C. Shall 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).

D. Shall identify simultaneous operations (SIMOPS) for a facility and/or equipment involved in the scope of work documented on the ATW.
   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.

E. Shall identify any conditions that require work to stop and the Asset Operator to be notified.

F. Shall issue permits to the Performing Authority or can delegate permit issuance to the AOD.
   1. Shall review and verify that permit conditions are deemed acceptable for the defined scope of work and affected equipment.

G. Shall review the Level 2 HITRA to verify that the scope is appropriate, permits have been identified, and that it has been properly approved.

H. Shall determine if changes can be made to a permit if permit conditions are exceeded, or if the permit should be cancelled and a new permit issued.
1. If the Asset Operator determines that changes to the permit can be made, he / she shall document their approval of the changes by initialing the changes where they are documented on the permit.
   a) For permits issued by telephone, the Asset Operator does not have to be on-site to approve and initial permit changes. The Asset Operator can verbally approve the changes and the Performing Authority can initial the changes on behalf of the Asset Operator (see Section 6.2).
   b) The Asset Operator shall determine if changes to the Level 2 HITRA are necessary and shall facilitate those changes as the HITRA Leader prior to approving the changes to the permit.

I. If Permit Issuance is delegated to an Asset Operator Designee (AOD), verifies that the AOD is certified for the type of permit(s) to be issued.

J. Shall update (or delegate updating) the Permit Register as soon as practical when issuing permits and after permits expire (see Section 7).

K. Shall verify that the Performing Authority and AOD, if utilized, understand which specific asset is to be worked on.
   1. 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.

L. 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.

M. Shall verify the workforce understands the scope of work, the specific asset equipment to be worked on, hazards and control measures, and permits required as documented on the ATW form.

N. Shall verify the workforce signs the ATW form, which documents that they understand and agree to perform work within the conditions and requirements listed on the ATW form.

O. Shall ensure that a walkdown is performed for the entire work crew when the scope of work involves a lockout.

P. Shall give the ATW form to the Performing Authority to keep on-site and available for review as needed.

Q. 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. Working involving a LOTO that requires DOM approval (Hierarchy of Isolation Control).
   5. Permitted work that requires DOM approval of a Level 2 HITRA (highest Residual Risk Level is High).
   6. Other work requiring DOM approval or notification.
   7. Work based on risk level.
      Note: Request to use an AOD (including CMT AOD) for above activities requires DOM approval (e.g., at a remote or unmanned location).

R. The AO shall establish a method of communication with the PA and the workforce if the AO leaves the job site.
S. Shall receive expired permits from the Performing Authority(s) and ensure the permit register is updated.

T. Shall verify the asset equipment is properly prepared for return to service upon completion of work.

U. Shall store the expired ATW forms, permits, and Level 2 HITRAs locally.

V. The Asset Operator, or AOD with DOM approval, shall be at the job site to set expectations on the first day for the startup of a contractor job that requires a SSHEP.
   1. The AO shall obtain DOM approval to allow an AOD to set expectations on behalf of the Asset Operator (e.g. at a remote or unmanned location).

5.2. **Asset Operator Designee (AOD)**

A. Shall issue permits to the Performing Authority.
   1. Shall review and verify that permit 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 ATW 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 ATW form as part of completing Section B.
   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.
   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 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.

E. Shall verify the workforce understands the scope of work, the specific asset equipment to be worked on, hazards and control measures, and permits required as documented on the ATW form if the AO does not serve this role.

F. Shall verify the workforce signs the ATW form, which documents that they understand and agree to perform work within the conditions and requirements listed on the ATW form.

G. Shall give the ATW form to the Performing Authority to keep on-site and available for review as needed.

H. **Shall update (or delegate updating) the Permit Register as soon as practical when issuing permits and after permits expire (see Section 7).**

I. 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.
   1. The AOD shall establish a method of communication with the PA and the workforce if the AOD leaves the job site.

J. Shall review the Level 2 HITRA to verify that the scope is appropriate, permits have been identified, and that it has been properly approved.
K. Shall determine if changes can be made to a permit if permit conditions are exceeded, or if the permit should be cancelled and a new permit issued

1. If the AOD determines that changes to the permit can be made, he / she shall document their approval of the changes by initialing the changes where they are documented on the permit
   a) The AOD shall determine if changes to the Level 2 HITRA are necessary and shall facilitate those changes as the HITRA Leader prior to approving the changes to the permit.

L. Shall verify understanding of which specific asset is to be worked on as identified by the Asset Operator.

M. Shall be at the job site to set expectations on the first day for the startup of a contractor job that requires a SSHEP if the Asset Operator does not serve this role and the AOD is approved by the DOM.

N. Shall sign the ATW form to verify understanding of permit conditions and acceptance of the responsibilities of the AOD.

O. Shall receive expired permits from the Performing Authority(s) and verify that the work written on the permit(s) has been completed.

P. Shall verify the asset equipment is properly prepared for return to service upon completion of work.

Q. Shall store the expired ATW forms, permits, and Level 2 HITRAs locally.

5.3. Performing Authority

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

B. Shall verify that everyone working under a specific permit understands the conditions specified on the permit and the requirement to stop work if permit conditions are exceeded or if the scope of work changes.

C. Shall receive ATW and / or permits from the Asset Operator or Asset Operator Designee. If only an ATW is required, the PA may complete the ATW in consultation with the AO.

Note: There can be a single Performing Authority for multiple permits. The complexity and risk involved in the work should be considered when making this decision as the Performing Authority’s fundamental role is to observe the work performed under a permit. Work under multiple permits may be difficult to monitor with one Performing Authority. Performing Authority roles may be handed off to a subsequent Performing Authority after notifying the AO / AOD.

D. Shall remain on the job site and monitor work to verify work is performed within the conditions documented on the ATW, permit(s), and Level 2 HITRA (if applicable).

E. Shall review the ATW form with new workforce members when they arrive at the job site.

F. Shall reassesses the work environment and revalidate the conditions on ATW and permit(s) before work can resume if work is interrupted or if the job site is left unattended, or if necessary, cancels the ATW and permit(s) and returns them to the AO / AOD.

G. Shall verify that only personnel authorized by the permit participate in the permitted work and that the work is performed within the conditions documented on the permit.

H. Shall keep the job site clean and in a safe condition both during and upon completion of the job.

I. Shall notify the AO / AOD when a permit expires as soon as practical so that the AO / AOD can update the Permit Register. If the permit expires after normal work hours, the notification may take place at the beginning of the next normal work shift to update the permit register.

J. 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.

5.4. **Workforce Members**

A. Shall participate in the completion of the Hazard Recognition and Mitigation section of the ATW form (Section B), 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 ATW 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 ATW form.

D. Shall execute the scope of work documented on the ATW and applicable permits 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 if job site conditions are exceeded as documented on the ATW form, or if anyone feels unsafe or uncertain about any aspect of the job.

G. Shall communicate lessons learned identified to the AO / AOD.

5.5. **Team Leader**

A. Responsible for hiring and training of AODs, with assistance from Procurement and the Learning & Development Team. See Appendix III 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 permits 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 IV 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 a discussion of the Authorization to Work Performing Authority (ATW PA) Responsibilities is conducted with the ATW PA prior to starting work on Day 1. A copy of the guide should be given to the ATW PA. See Appendix V for the Authorization to Work Performing Authority (ATW PA) Responsibilities discussion guide.

D. Shall perform active CoW Permit Field Inspections.

E. Responsible for completing corrective actions for findings from CoW Permit 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.
   4. Excavation entry >20 feet.
   5. Job kickoff on Day 1 of job.
5.7. **CoW Evaluator**

A. Perform practical evaluations for Control of Work Roles.

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6. **Permit Issuance**

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

*Note:* The ATW form, Level 2 HIITRA form, and LOTO procedure are not permits.

6.1. **General Requirements**

A. Completion and issuance of a permit shall require a minimum of two people: the Asset Operator, who issues the permit, and a Performing Authority, who receives the permit.

   1. The Asset Operator or Asset Operator Designee, if applicable, cannot be the Performing Authority for permitted work. The AO or AOD can be the Performing Authority for the ATW form. *Self-permitting is prohibited.*

   2. The Performing Authority can be part of the workforce executing permitted work, but, by definition, the Performing Authority shall be the foremost individual who oversees the permitted work and takes responsibility for verifying that the work is performed within the conditions documented on the ATW and / or permit(s).

B. The Asset Operator / Asset Operator Designee shall review and verify that the permit has been prepared and filled out correctly, and that permit conditions are appropriate for the work to be performed.

C. If permit conditions are exceeded, work and the permit shall be suspended until the Asset Operator / Asset Operator Designee determines if changes can be made to the permit or if the permit should be cancelled and a new permit issued.

   1. If the Asset Operator / Asset Operator Designee determines that changes to the permit can be made, he / she shall document their approval of the changes by initialing the changes where they are documented on the permit.

D. All permits shall require the signatures of the Asset Operator or Asset Operator Designee (if applicable) and the Performing Authority. Additional signatures for permits are defined in each permit policy.

   *Note:* If additional space is needed for any section of any permit, a blank sheet of paper or a blank permit may be used.

E. A permit is valid for one work shift for individuals working under the permit, or for the duration of the scope of work documented on the permit, whichever period is shorter.

F. If an individual with an assigned role on a permit is replaced during a shift, the incoming replacement shall review and sign the permit for the specific role they are taking over for that permit (e.g. Asset Operator replaced by a new Asset Operator). By signing the permit, the new person is agreeing to fulfill the role and abide by the conditions of the permit that they are signing.

G. 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.

H. BP Control of Work requirements apply to all work performed by the USPL workforce, regardless of where that work is performed.
1. If work is performed at another BP entity facility and USPL workforce is covered by the BP entity’s permit to work scope, then USPL Control of Work documents are not necessary.

2. If work is performed at another BP entity facility and USPL workforce is not covered by the BP entity’s permit to work scope, then USPL Control of Work documents are required.

I. The Asset Operator shall cover the following activities when discussing planned work with the Asset Operator Designee:
   a) SIMOPS activities (if any) and related mitigation actions.
   b) Clear understanding of the specific equipment to be worked on.
   c) Conditions which shall require work to be stopped (if any).
   d) The asset equipment has been properly prepared for the scope of work to be performed safely.

6.2. Telephone Authorization of Permits

A. The Asset Operator can issue some permits to a Performing Authority via the telephone. Permits which are allowed to be issued via telephone are identified in the permit policies.

B. For permits issued by telephone, the Asset Operator does not have to be on-site to issue the permit or attend the job startup.

C. Permit issuance via telephone shall adhere to the following process:
   1. The Performing Authority shall contact the Asset Operator to review the scope of work to be performed under the permit and verify that the permit has been filled out correctly and conditions identified on the permit are acceptable.
   2. If the Asset Operator deems the permit conditions are acceptable for the scope of work to be performed, he / she can verbally authorize and issue the permit.
   3. The Performing Authority shall sign on behalf of the Asset Operator in the appropriate signature line of the permit.

7. Permit Register

A. A permit register shall be used for recording the status of all permits. All permits shall be recorded on one of the two following methods.
   1. The Electronic Permit Register is an online application for logging permits.
      a) The Electronic Permit Register can be accessed from the USPL homepage or in the Tools page of the USPL Intranet Site. A job aid is available there with instructions on how to use the register.
   2. For permits not logged into the Electronic Permit Register by Operations outside of Olympic Pipeline, the Tulsa Control Center shall be responsible for maintaining and updating the Control Center Permit Register as instructed by the Asset Operator or Asset Operator Designee.

B. The Asset Operator or Asset Operator Designee is accountable to update the permit register as soon as practical after issuing a permit. The AO / AOD can delegate the recording of required information on the permit register to other individuals, but remains accountable for the information entered in the permit register.

C. Upon expiration of a permit, the Performing Authority (PA) shall contact the Asset Operator or Asset Operator Designee to update the permit register with the date and time when the permit expired. If a permit expires after normal work hours, the PA can contact the AO / AOD at the beginning of the next normal work shift to update the permit register.
8. **CoW Permit Field Inspection**

8.1. **General Requirements**

A. A sampling of active permit work shall be audited and documented using the **Control of Work Field Inspection Checklist**. The type and frequency of permits to be audited shall be determined as follows.

1. At minimum, 1 permit of each permit type, including ATW and HITRA forms, shall be audited per month for each team.
   a) If there are no permits issued for a specific permit type, there are no requirements to perform auditing for that permit type that month.
   b) 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](#)).

2. All permits to be audited shall be **active permits** at the job site while work is being performed.

3. Team Leaders are accountable for performing permit work field inspections.

B. Permit field inspections shall be performed by operations management and HSSE staff who have been trained and deemed competent in the ATW and permit policies.

8.2. **CoW Permit Field Inspection**

A. The CoW Permit Field Inspection shall be completed as follows.

1. Upon arriving at the permit job site, notify the AO / AOD and the Performing Authority that you will be auditing the permitted work activity(s) and that you will provide feedback on your observations after you have completed your auditing.

2. Review the ATW, permit(s), and Level 2 HITRA(s) and interview people involved with the permit work to verify their understanding.

3. Stop any work that is observed to be unsafe, does not have the proper permit, or is not being performed as stated on the permit.

4. Upon completion of the CoW Permit Field Inspection, review the results with the onsite Performing Authority and AO / AOD and enter results in the CoW Permit Field Inspection.

5. Review the results with the appropriate Team Leader as soon as practical.

8.3. **Findings**

A. Team Leaders are responsible for addressing findings not addressed by the AO / AOD and Performing Authority.

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9. **Authorization to Work (ATW) Form**

The ATW form (Appendix I) serves multiple purposes and documents: (1) the scope of work to be performed; (2) simultaneous operations; (3) conditions that require work to stop and notify the Asset Operator; (4) hazards and mitigations; (5) Permits issued; and (6) authorization for an Asset Operator Designee to issue permits.

ATW forms can be ordered as hard-copy forms or downloaded online from the Documents and Records Management (DRM) site (refer to Appendix I for instructions on how to use the online form). For hard-copy forms, see the instructions on the USPL HSSE web page (from the USPL homepage, select the Process tab, then select HSSE).
A. The AO / AOD shall be responsible for the completion of an ATW form for work as required by this policy.

Note: Initial emergency response operations will not require an ATW to be completed prior to completing emergency tasks specified in the Facility Response Plan or Emergency Response Plan. ATWs and any required permits shall be prepared prior to conducting work beyond the initial emergency tasks.

B. One ATW 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 ATW for each site, and
3. the AO is contacted for each site for SIMOPS.

C. A completed ATW is valid for one work shift for individuals working under the ATW, or for the duration of the scope of work documented on the ATW, whichever period is shorter.

D. The ATW form can be modified for changes and new permits 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 ATW form are made or if the ATW form has been canceled and replaced with a new ATW. The PA will communicate any ATW changes to the workforce.
3. The AO / AOD should cancel the ATW form and replace it with a new ATW if changes or additions are substantial.
4. If the ATW is cancelled during a job, all associated permits which are documented on that ATW 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 ATW form shall be reassessed and updated, or cancelled and a new ATW issued.

F. If additional space is needed on an ATW form, the AO / AOD may use a blank sheet of paper or a second ATW form and scratch out the ATW form identifier number and attach it to the original ATW. For example, additional space may be needed for workforce signatures or for documenting hazard mitigations.

G. If an ATW form does not contain a uniquely generated number, the AO/AOD shall create a unique ATW number which may be generated as follows: AO/AOD’s initials, MMDD, and a sequential number for additional ATW forms, e.g., KS10161, KS10162, etc.

H. The original completed ATW forms shall be retained locally for a minimum of one year.

1. Refer to the local district for filing and storage instructions.

9.1. Section A: General

A. Section A of the ATW form shall be filled out each time an ATW form is completed. Section A documents the general elements of the work to be performed.

B. If the Asset Operator is replaced during a shift, the on-coming Asset Operator name and phone number shall be added to the ATW form. The AO / AOD shall verify that the on-coming Asset Operator understands and agrees to the existing ATW conditions or makes changes as necessary. AO items include SIMOPS, stop work conditions, permits, permit register and AOD delegation.
9.2. **Section B: Hazard Recognition and Mitigation**

The purpose of the Hazard Recognition and Mitigation section of the ATW 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. Section B of the ATW form shall be filled out each time an ATW form is completed.

B. 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.

C. 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 permit 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**

D. The AO / AOD should document any key points from the pre-job tailgate discussion in Section B of the ATW form particularly for review with workers who arrive at the job site after the pre-job tailgate meeting. The pre-job tailgate should be conducted at the jobsite.

9.3. **Section C: Workforce Documentation of Understanding and Agreement**

A. Section C of the ATW form shall be completed each time an ATW form is completed.

B. The Performing Authority and workforce shall print and sign their name, and enter their phone number in Section C. 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. Phone numbers may be used to locate workers, if necessary, after an emergency event.

1. New workers that arrive at the job site after work begins shall review the ATW with the PA and sign the ATW before they can perform work.

C. The PA shall print and sign their name, and enter their phone number, on the PA signature line thereby accepting the responsibility to oversee the work documented on the ATW form.

D. If the PA is replaced during the same shift, the oncoming PA shall print and sign their name on the ATW form for their designated role. In signing the ATW, the on-coming PA is agreeing to abide by the conditions of the signature statement for their role.

9.4. Section D: AOD Acceptance

A. Section D of the ATW form shall be completed when an AOD is present on the job.

B. 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.

C. The Team Leader shall approve the use of an Asset Operator Designee (AOD) and the individual who will serve as AOD. The Team Leader shall also verify the AOD individual is certified to issue applicable permits.

1. Refer to the Learning Management System (e.g. VTA) for AOD training and certification status.

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

E. Any exceptions to the roles of the Asset Operator Designee as stipulated by this policy shall be discussed and agreed to by the DOM.

9.5. Section E: ATW and Permit Close out

Section E documents close out of permits after they have expired and the ATW. Permit types include Confined Space Entry, Critical Lift, Excavation, Hot Work, and Cold Work.

A. Upon expiration of a permit, the Performing Authority shall document the expiration time on Section E of the ATW form along with their signature attesting that the job site was left in a safe condition. The PA shall then notify the AO / AOD to update the Permit Register, and return the paperwork when practical. If the permit expires after normal work hours, the PA may notify and return the permit to the AO / AOD at the beginning of the next normal work shift.

B. The PA / AO / AOD shall document the time the ATW expired.
10. Training and Competency

A. 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.

B. All contractors who perform work within the scope of this policy shall understand their specific roles and responsibilities and the purpose and use of the ATW form. The AO / AOD should review the ATW process with contractors during the pre-job meeting.

C. Employees and contractors serving as the AO / AOD shall complete AO / AOD training and certification.

D. Asset Operators and Asset Operator Designees shall be trained as Level 2 HITRA Leaders. (Refer to the Level 2 HITRA Procedure)

Note: Refer to the USPL Control of Work Training and Competency Matrix for specific training requirements.

11. References

1. GDP 4.5-0001, BP Group Defined Practice, Control of Work
2. USPL Control of Work Policy
3. BP Operating Management System Framework
4. OMS Guide, Permit to Work
Appendix I

Authorization to Work (ATW) Form

This example of the ATW form is for reference only.

---

**Section A: General**

**Date:**

**Location, e.g., address or cross roads:**

**Asset Operator (AO) Name:**

**AO Contact Number:**

**Equipment/Line ID:**

**Work Order Number:**

**Scope of Work (or attach if defined in another document):**

**Medical Facility and Phone #:**

**Emergency Services Phone #:**

**Are equipment and tools subject to fit for purpose and intact by the equipment operator?** [Yes/NA]

**Are formal equipment inspections or certifications, if required, up to date?** [Yes/NA]

**Electrical workers have NPPA 65 training?** [Yes/NA]

**Is there someone designating the Critical Lift?** [Yes/NA]

**Are there any SIMOPS activities that could impact the work to be performed?** [Yes/No]

---

**Required Permits**

**Assessment has been completed and no technically alternate means of performing the permitted work have been identified. All required permits and related forms are accessible on site. (Check that all apply)**

- Hot Work
- Confined Space
- Critical Lift
- Excavation
- Cold Work Permit (Check Cold Work type below)
- Movement of heavy equipment inside a facility
- Toxin Substance Exposure
- Work at Height

**Level 2 HIRA Title(s):**

**Does the current activity and approved HIRA fully cover the work activities?** [Yes/NA]

---

**Other Applicable Actions, Policies and Procedures**

- [ ] Approved Lockout Procedure
- [ ] LOTO Number
- [ ] Traffic Safety Plan
- [ ] Work Alone
- [ ] Communication Link Name & Number
- [ ] Call-in Frequency
- [ ] Line All
- [ ] Contact Control Center
- [ ] Standard Procedure(s)
- [ ] MOC #
- [ ] Aircraft/ Vessel LR Pre-Use Inspection Checklist
- [ ] Other

---

**Section B: Hazard Recognition and Mitigation**

Identify the potential hazards of the job, physical site, equipment & tools to be used in relation to any energy sources listed below. Items, by hazard number, the specific task and observable controls that will eliminate or mitigate each hazard should be checked. The hierarchy of controls including elimination, substitution, engineering, isolation, administrative, and PPE and shall be considered in that order. Refer to the USPL PPE Matrix for task-specific PPE requirements.

**Biological** [NO]

- [ ] Insects
- [ ] Bloodborne Pathogens
- [ ] Poison oak/ivy
- [ ] Snakes
- [ ] Animals

- [ ] Drowning from medications
- [ ] TSA from
- [ ] Other:
- [ ] Other:

**List mitigation controls for hazards checked:**

- [ ] Body Mechanics [NA]
- [ ] Lifting
- [ ] Pushing
- [ ] Pulling
- [ ] Climbing
- [ ] Other:
- [ ] Other:

**List mitigation controls for hazards checked:**

- [ ] Chemical [NA]
- [ ] Acids/ caustics
- [ ] Spillage
- [ ] Inhalation
- [ ] Benzene
- [ ] Asbestos
- [ ] Lead
- [ ] Welding fumes
- [ ] Oxygen deficient
- [ ] Herbicides
- [ ] Pesticides
- [ ] Carbon monoxide
- [ ] Hydrogen sulfide
- [ ] Hydrogen cyanide
- [ ] Other:
- [ ] Other:

**List mitigation controls for hazards checked:**

- [ ] Electrical [NA]
- [ ] Class area
- [ ] Use of portable electrical power tools
- [ ] Batteries/Generators
- [ ] Flash hazard
- [ ] Radio frequency power
- [ ] Open electrical equipment
- [ ] Shock hazard
- [ ] Static electricity
- [ ] Adjacent energized equipment
- [ ] Unqualified individuals, personnel

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Revision Date: May 29, 2018

Effective Date: May 29, 2018

Next Review Date: May 29, 2023

The controlled version of this document can be found in DRM in the HSSE Policies folder.
<table>
<thead>
<tr>
<th>Hazard Category</th>
<th>Risk Factors</th>
<th>List Mitigation Controls for Hazards checked</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gravity</td>
<td>Slip, trip, fall,</td>
<td>41. Walking at heights, 45. Working over water, 46. Other:</td>
</tr>
<tr>
<td></td>
<td>suspended loads,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>falling objects,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>working at heights</td>
<td></td>
</tr>
<tr>
<td></td>
<td>cave-in,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>other:</td>
<td></td>
</tr>
<tr>
<td>Mechanical</td>
<td>caught in, on, or between</td>
<td>50. Rotating equipment, 51. Moving equipment, 52. Grinding, 53. Sharp edges, 54. Boom swing, 55. Damage to piping/conduit, 56. Other:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>noisy area,</td>
<td>57. Noisy area, 58. Noisy tools/equipment, 59. Communication difficulties, 60. Other:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pressure</td>
<td>pneumatic,</td>
<td>61. Pneumatic, 62. Hydraulic, 63. Thermal/steam, 64. Fluids and gases, 65. Stored energy, 66. Other:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>67. Other:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thermal</td>
<td>heat stress,</td>
<td>73. Heat stress, 74. Cold stress, 75. Hot surface, 76. Steam, 77. Other:</td>
</tr>
<tr>
<td></td>
<td>hot surface,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>steam,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>other:</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Pre-job / Tailgate Discussion
This section should document any key points from the pre-job tailgate discussion. This should be conducted at the jobsite.

### Section C. Workforce Documentation of Understanding and Agreement
I acknowledge my understanding of the hazard assessment completed on this form and have a clear understanding of the specific equipment to be worked on. I understand my responsibility to abide by all conditions documented on this form, and if applicable, permits, and Level 2 HITRA. I am also responsible to stop any work that I believe is unsafe, if the scope of work changes, or if ATW / permit conditions are exceeded, then notifying the AO / AOD. (Print, sign & phone #)

1. Performing Authority: I accept responsibility to oversee the work documented on the ATW and any permits. The AO was contacted for SIMOPS and Stop Work conditions. I understand I am to leave the worksite in a safe condition and contact the AODC to discuss on the work performed. If the AODC is not onsite, they have authorized me to begin work.

2. Phone:

3. Phone:

4. Phone:

5. Phone:

6. Phone:

7. Phone:

8. Phone:

Time ATW issued: am/pm

### Section D. AOD Acceptance (if AOD present)
AOD: I have received approval from the Team Leader and authorization from the Asset Operator to serve as the Asset Operator Designee and issue permits on behalf of the AO.

I understand the scope of work, hazards, and mitigations on this ATW and have confirmed that a member of the workforce has visited the physical jobsite to verify site conditions. I have a clear understanding of the specific equipment to be worked on, any simultaneous operations that may impact the work and conditions that will cause work to be stopped. I understand I am responsible for notifying the mitigations documented on this form and on the Level 2 HITRA, if applicable, are implemented. I am also responsible for verifying that all workforce members working under this ATW have read and documented their understanding of the conditions, hazards, and control measures by signing the ATW.

AOD (Print & Sign): Phone:

### Section E. ATW and Permit Close Out
By documenting the Time Expired, the Performing Authority is stating that the permit is no longer active and the job site is left in a safe condition. Once a permit has expired, the PA shall contact the AODC so that the Permit Register can be updated.

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Time Expired</th>
<th>PA Signature</th>
<th>Date Expired</th>
<th>PA Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>am/pm</td>
<td>am/pm</td>
<td>Date Expired</td>
<td>am/pm</td>
</tr>
<tr>
<td>2</td>
<td>am/pm</td>
<td>am/pm</td>
<td>Date Expired</td>
<td>am/pm</td>
</tr>
<tr>
<td>3</td>
<td>am/pm</td>
<td>am/pm</td>
<td>Date Expired</td>
<td>am/pm</td>
</tr>
<tr>
<td>4</td>
<td>am/pm</td>
<td>am/pm</td>
<td>Date Expired</td>
<td>am/pm</td>
</tr>
</tbody>
</table>
Instructions for using online / electronic ATW Form:

1. ATW form is located on DRM in the HSSE Policies folder, sub-folder Authorization to Work.
2. When opening the form you may be prompted with a Security Warning pop up box. Select Enable Macros.
3. Set default printer settings to legal paper size. If available, set options to 2-sided and color. The unique ATW number will be printed on each page in case printer cannot print 2-sided.
4. Any information that will be entered on the form electronically needs to be entered prior to proceeding to step 5.
5. Select Print ATW Forms in upper left and enter the number of copies to be printed. The form will automatically print at this time. Each printed form will have its own unique ATW number.
6. The ATW form can be saved on your desktop. A unique ATW number will be created each time the form is printed.

Note: If you are unable to click on the Print ATW Forms button, you need to change your Macro security settings. Go to toolbar at top of screen and select:
   ➢ Tools
   ➢ Macro
   ➢ Security
   ➢ Select Medium
   ➢ Click OK

Instructions for printing if text is erased any only checkboxes are saved when printing:

1. While the ATW form is open, click on "Tools" from your toolbar at the top of the screen.
2. Then click on "Options", then click on the "Print" tab.
3. Uncheck the "Update Fields" tab and select okay.
4. The form should print correctly and retain the text that was typed in the free text fields.

   For Microsoft Office 10, follow these instructions:

   1. With the ATW open, go to File, click Options, select Display and under Printing Options uncheck "Update Fields" before printing.
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 ATW.
Appendix III

Asset Operator Designee (AOD) Responsibilities

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

Asset Operator Designee (AOD) Responsibilities

Asset Operator Designee Shall:
- Issue Control of Work permits 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 ATW.
- 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 ATW 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 are within the date of any required formal inspection or certification.
- Verify understanding of which specific assets 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 See Something that is not right, Say Something, and Do Something about it.
- Prioritize work and do not let other activities distract you from focusing on your primary task at hand.
- Stop work and notify the AO if ATW permit conditions are exceeded, job scope changes and/or encounter any unsafe conditions.
- Verify the workforce understands, agrees and signs the ATW 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 ATW form.
- Sign the ATW form to verify they understand the permit conditions and their responsibilities as an AOD.
- Verify that the mitigations documented on the ATW and Level 2 HITRA are implemented.
- Determine if changes can be made to a permit if permit conditions are exceeded, or if the permit should be canceled and a new permit issued. Approve changes by initialing the changes on the permit.
- 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 ATW PA, review the roles and responsibilities with the new ATW PA and ensure they understand the ATW PA responsibilities before they sign the ATW.
- Receive expired permits from the Performing Authority (PA) and verify that the work written on the permit(s) has been completed.
- Verify the asset equipment is properly prepared for return to service upon completion of work.

Key Definitions:

Asset Operator (AO)—A BP employee or contractor individual who is responsible for the operation of the asset where work is being performed. The Asset Operator is the Asset Operator Designee (if used) is responsible for the completion of the ATW form.

Asset Operator Designee (AOD)—A BP employee or contractor individual who is authorized to issue ATW and/or permits 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 those hazards for a permitted work activity or task.

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

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

Shall—Used where a provision is mandatory.
Appendix IV

Authorization to Work Performing Authority (ATW PA) Responsibilities

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

Authorization to Work Performing Authority (ATW PA)
Responsibilities

ATW Performing Authority Shell:
- Ensure the hazards and mitigations documented on the ATW 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 about 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 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 permit participate in permit work.
- Remain on the job site and monitor work to verify work is performed within the conditions documented on the ATW, permit(s), and Level 2 HITRA (if applicable).
- Review the ATW with new workforce members when they arrive at the job site.
- Recess the work environment and revalidate the conditions on ATW and permit before work can resume if work is interrupted or if the job site is left unattended.
- Stop work and notify the AO / AOD if ATW/permit conditions are exceeded, job scope changes and/or encountered 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 time on the permit and on the ATW form in Section C.
- Notify the AO / AOD when a permit expires as soon as practicable so that the AO can update the Permit Register. If the permit expires after normal work hours, the PA may notify the AO at the beginning of the next normal work shift.
- Contact the AO / AOD at the end of each 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 one is designated) is responsible for the completion of the ATW form.

Asset Operator Designee (AOD)—A BP employee or contractor/individual who is authorized to issue ATWs and/or permits 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 a property fence line where work is being performed.

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

Shall—Is used where a provision is mandatory.