

USPL Control of Work Policy

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1.0 Purpose and Scope

The purpose of this policy is to set forth a formal approach for safely controlling risks associated with the following activities: construction, maintenance, demolition, remediation, operating tasks, tour watch, manual labor and other similar work activities. **This policy does not apply to initial emergency response actions as listed in Facility and Emergency Response Plans.**

This formal approach is the application of the policies and procedures shown in Section 4.9. This policy addresses the requirements of GDP 4.5-0001, BP Group Defined Practice, Control of Work (See Appendix 2).

This policy applies to all employees and contractors while performing work on behalf of USPL.

2.0 Control of Work Policy Responsibilities

Administration and authorization responsibilities for this Policy are:

Single Point of Accountability: Business Unit Leader, US Pipelines & Logistics. The Single Point of Accountability shall have overall responsibility for the development, updating and control of the written USPL CoW policy and associated policies and procedures.

Maintainer: HSSE Manager - S&O. The Maintainer shall maintain the integrity of the documents, including regular reviews and audits.

Adjudicator: Business Unit Leader, US Pipelines & Logistics. The Adjudicator shall authorize changes to the documents.

Technical Authority: HSSE Manager - S&O. The Technical Authority shall confirm the accuracy and integrity of the technical content and changes. Questions of interpretation should be directed in writing to the Technical Authority of this policy for proposed clarification.

Document Controller: Standard Procedures Manager. The Document Controller shall establish and maintain control of CoW documents through the USPL Documents & Records Management System, including the assignment of reference numbers, issue, storage, retrieval, version control and change control.

3.0 Control of Work Accountabilities

Accountabilities for USPL Control of Work roles are defined as follows:


3.1 USPL Business Unit Leader (BUL)

Accountable for the conformance to policies and procedures and the execution of work in USPL in accordance with USPL CoW requirements

3.2 District Operations Manager (DOM)

Accountable for the conformance to policies and procedures and the execution of work in their district in accordance with USPL CoW requirements

3.3 Terminal Manager/ Team Leader (TM/TL)

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Accountable for the conformance to policies and procedures and the execution of work in their assigned area of responsibility in accordance with USPL CoW requirements

3.4 Asset Operator (AO)

Accountable for the conformance to policies and procedures and the execution of work in their assigned area of responsibility in accordance with USPL CoW requirements. Accountable for the execution of work in conformance with the conditions documented on the ATW

3.5 Asset Operator Designee (AOD)

Accountable for the conformance to policies and procedures and the execution of work in their assigned area of responsibility in accordance with USPL CoW requirements. Accountable for the execution of work in conformance with the conditions documented on the ATW

3.6 Control of Work Evaluator

Performs practical evaluations for Control of Work policy roles

3.7 Performing Authority

Accountable for the execution of work in conformance with the conditions documented on the permit(s)

3.7.1 Authorized Gas Tester

Accountable to fulfill air monitoring responsibilities in accordance with the Hot Work Policy/Permit, Excavation Policy/Permit, Confined Space Entry Policy/Permit

3.7.2 Hot Work

3.7.2.1 Fire Watch

Accountable to fulfill fire watch responsibilities in accordance with the Hot Work Policy/Permit

3.7.2.2 Hot Work Operator

Accountable to fulfill Hot Work Operator responsibilities in accordance with the Hot Work Policy/Permit

3.7.3 Excavation


3.7.3.1 Competent Person

Accountable to fulfill Competent Person responsibilities in accordance with the Excavation Policy/Permit

3.7.4 Critical Lift

3.7.4.1 Lift Operator

Accountable to fulfill Lift Operator responsibilities in accordance with the Lifting and Rigging Policy/Critical Lift Permit

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3.7.4.2 Rigger

Accountable to fulfill Rigger responsibilities in accordance with the Lifting and Rigging Policy/Critical Lift Permit

3.7.4.3 Signal Person

Accountable to fulfill Signal Person responsibilities in accordance with the Lifting and Rigging Policy/Critical Lift Permit

3.7.5 Confined Space Entry

3.7.5.1 Entry Supervisor

Accountable to fulfill Entry Supervisor responsibilities in accordance with the Confined Space Entry Policy/Permit

3.7.5.2 Attendant

Accountable to fulfill Attendant responsibilities in accordance with the Confined Space Entry Policy/Permit

3.7.5.3 Authorized Entrant

Accountable to fulfill Authorized Entrant responsibilities in accordance with the Confined Space Entry Policy/Permit

3.7.5.4 Rescue Personnel

Accountable to fulfill rescue personnel responsibilities in accordance with the Confined Space Entry Policy/Permit

3.7.6 Cold Work

3.7.6.1 Workforce

Accountable for performing cold work in accordance with the Cold Work Policy/Permit

3.8 Supervisor

Verify that permit work auditing is performed

3.9 Workforce


Accountable for performing work in accordance with USPL CoW Policies and Procedures

4.0 Policy

4.1 All personnel performing work on behalf of USPL have the responsibility and authority to stop any work they consider to be unsafe.


4.2 The USPL Operations organization is responsible for the safe operation of the assets under its jurisdiction.

4.3 For initial emergency response operations, personnel shall follow the procedures in their Facility Response Plan or Emergency Response Plan which have safe work

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procedures that may not be consistent with USPL Control of Work policies. The Site Safety Officer shall determine when the initial emergency response is over and the application of USPL Control of Work policies resumes.

- 4.4** All permits shall be issued by an Asset Operator or Asset Operator Designee and shall be received by a Performing Authority. Self-permitting is prohibited.
- 4.5** The master copy of this policy shall reside and be controlled on the Documents & Records Management (DRM) System.
- 4.6** This policy and associated documentation shall be subject to a regular review (at least once every five years) and whenever circumstances dictate.
- 4.7** Any deviations from this policy shall be submitted via the USPL Management of Change process and authorized by the Single Point of Accountability.
- 4.8** Suggested changes or amendments to this policy and associated documents shall be forwarded to the Technical Authority along with the reasons for the proposed change.
 - 4.8.1** Suggested changes or amendments shall be acknowledged and, if rejected, the reasons given for their rejection.
 - 4.8.2** Accepted changes shall be approved by the Single Point of Accountability and administered through the Management of Change process. See 4.4 for document control.
- 4.9** Placeholder for Assurance Process - TBD
- 4.10** The following documented policies and procedures shall contain the mandatory policies and procedures that describe and support the Control of Work process.
 - 4.10.1** The **Authorization to Work** (ATW) Policy defines the requirements for:
 - Assessing risks associated with conducting work (Level 1)
 - Communication of scope, hazards controls and mitigation
 - Regular monitoring of ongoing work requiring a permit
 - Safe condition of the work site upon interruption or completion of work scope
 - Stopping, communicating, investigating and reporting unsafe work
 - 4.10.2** The **Training and Competency Matrix** defines the requirements for:
 - The training and competency requirements for organizational positions that shall fill the roles of the Control of Work processes
 - 4.10.3** The **Work Management Process** defines requirements for:
 - Planning and scheduling asset maintenance and project work.
 - 4.10.4** The **Standard Procedures** Policy defines the requirements for:
 - The identification, creation, control, and audit of Standard Procedures

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- The performance and recording of Risk Assessments.

4.10.5 The **Permit Policies** define the requirements for issuing permits. These policies include hot work, confined space entry, lifting and rigging, cold work and excavation.

4.10.6 The **USPL Lock-Out Program** defines requirements for Lockout Procedures. It sets forth the requirements for isolation of energy sources prior to the execution of work.

4.10.7 The **Level 2 Hazard Identification and Task Risk Assessment Procedure** defines the process for performing Level 2 risk assessments.

4.10.8 The **Document & Records Management System** defines the requirements for:

- Issuance, control, review, record retention, and the revision of controlled documents

4.10.9 The **Lessons Learned Procedure** defines the process for identifying and communicating improvement opportunities in the Control of Work process.

4.10.10 The **Stop Work Procedure** defines the process for stopping and reporting unsafe work.

4.10.11 The **Shift Handover Procedure** defines the requirements for conducting formal shift handovers.

4.10.12 The **Self Audit and Assurance Procedure** defines the process for performing self audits and assurance activities.


4.11 The table in Appendix 3 shows the alignment of Control of Work Group Standard Permit to Work Process role titles with USPL role titles:

4.12 Training

4.12.1 Personnel involved in work covered by this Policy shall be trained and demonstrate competency to the appropriate level. The training and competency requirements for all CoW roles are identified in the training and competency matrix.

4.12.2 Competency assessment is determined by HSSE and developed / managed by the Learning and Development (L&D) Team but generally consists of training, testing, on-the-job training (OJT), and practical evaluation (certification).

4.12.2.1 Training is assigned by the employee's supervisor in conjunction with HSSE and documented in the learning management system (e.g. Virtual Training Assistant, VTA) for the level of knowledge the employee needs about CoW policies and procedures. The L&D Team will determine the training methods (e.g. face-to-face training, webinars, etc.), the frequency of training to be offered, and course content including refresher training.

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4.12.2.2 Testing is generally conducted online through the learning management system. The L&D Team will determine testing methods, passing scores, and remedial training methods.

4.12.2.3 OJT allows the employee to practice their CoW skills under the guidance of CoW certified coworkers or Safety Coordinators using checklists developed by the L&D Team.

4.12.2.4 Practical evaluations are generally conducted by Safety Coordinators. This process can be performed during OJT. Recertification is similar to the original practical evaluation with the Safety Coordinator using judgment to determine the refresher course content and evaluation.

4.12.3 Personnel not certified as competent in a CoW role may work under the direction of a person who has been certified in that role.

4.12.3.1 An AO or AOD that is trained but not certified may issue a permit if it has been reviewed by a Safety Coordinator or another individual as designated by the Safety Coordinator.

4.12.4 Certification is required for CoW roles identified as policy roles in the training and competency matrix. Certification is not required for technical roles for work performed in conjunction with the implementation of the CoW policies and procedures.

4.12.4.1 The CoW technical roles include Lift operator, rigger and signal person, Excavation competent person and Damage Prevention entry into a non-USPL excavation, Hot Work fire watch, and Confined Space entry supervisor, attendant, authorized entrant and rescue personnel.

4.12.4.2 The CoW policy roles include AO, AOD, and Level 2 HITRA Leader. Policy roles will be filled by certified individuals.

4.12.5 Initial training shall be completed before personnel may perform duties listed as policy roles in the training and competency matrix.

4.12.6 Refresher training on CoW policy roles shall be completed as identified in the training and competency matrix.


4.12.7 All employee training shall be documented in the learning management system. Contractor training on Control of Work policy roles shall be documented in the learning management system or an equivalent system.

5.0 Prerequisites (General Requirements)

Not Applicable

6.0 Health, Safety, Security, Environment, Hazard Identification, and Risk Assessment / Mitigation

Not Applicable

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7.0 Equipment and Forms Required



Not Applicable

8.0 Supporting Documents / Related Procedures

- GRP STD 02 BP Group Standard, Control of Work
- GDP 4.5-0001, BP Group Defined Practice, Control of Work
- Control of Work Group Standard, Permit to Work Process
- Control of Work Group Standard, Hazard Identification and Task Risk Assessment
- USPL Work Management Process Policies and Procedures
- USPL Training and Competency Matrix
- USPL Contractor Management Procedures
- USPL Standard Procedures Policy and Procedures
- USPL Document & Records Management System Policies & Procedures
- USPL Safety Manual

9.0 Procedures

Not Applicable

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Appendix 1 – 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 completing the ATW form and monitoring the work to verify ATW conditions are being met.

Asset Operator Designee (AOD)—A BP employee or contractor individual who is authorized by the Asset Operator and approved by the DOM to issue permits on behalf of the Asset Operator. The Asset Operator or an Asset Operator Designee (if used) is responsible for completing the ATW form and monitoring the work to verify ATW conditions are being met.

Authorization To Work (ATW): An approved management system that controls work in a safe manner

Auditing: A formal or official examination and verification. The audit process shall include monitoring, review, and reporting of the outcome of the audit to those people who can implement any changes needed.

Certification: A USPL process which indicates a worker is knowledgeable and qualified to perform the identified Control of Work role.

Competency: The ability to perform a task in the correct manner with the correct understanding and reasoning behind the task.

Competent Person: A person who has demonstrated that they have the knowledge, training and experience required to perform the defined role to the standard required.

Contractors: Members of the workforce employed by and working on behalf of a Company that has a contract to perform work for a BP Company.

Control:

- a) A mechanism used to regulate a physical process or activity.
- b) An action to mitigate risk.
- c) The power to direct (usually through authority).

Hazard: A source of potential danger that can lead to injury to people or the environment.



Job Site – Within visual proximity of the work being performed

Learning management system - A generic term for USPL's system for the administration, documentation, tracking, and delivery of the training and certification process.

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.

Management of Change: An established means of managing and controlling changes within an organization.

Mitigation: An action or event which prevents or minimizes the effects of an incident or condition.

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Monitoring: The routine function of regular inspection carried out by a responsible and competent person.

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

Operational Control: Where BP has responsibility for the activity as owner or under a contractual obligation with the owners of the entity and, as a consequence, has appropriate authority to manage directly all HSSE aspects of the operational activities to meet BP policy and expectations.

Operating Tasks: Tasks carried out by personnel who run BP facilities and production units which require interface with plant and equipment and are necessary to ensure ongoing plant operations (e.g. sample taking, filter element replacement, etc).

Permit: A formal and detailed document containing location, time, equipment to be worked on, Hazard identification, mitigation/precaution measure used, naming those authorizing the work and those performing the work.

Planning and Scheduling (P&S): A systematic process of identifying and listing work and determining when such work should be carried out.

Policy: Plan of action pursued by the Company (BP) with which all personnel shall comply.

Procedure: A detailed document either in paper or electronic form which sets out sequential or parallel actions which shall be followed by those engaged in carrying out an activity.

Process: A detailed description of a management system or a production operation.

Requirements: The activities, tasks or deliverables that shall be completed to comply with the Mandatory Requirements

Roles: The documented description of personnel functions within a management structure.

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.


Training: The bringing of a person to a desired degree of proficiency in some activity or skill. Training shall only be carried out by people who have been assessed as being competent to train.

Task: An activity in support of a piece of work.

Work: An activity made up of one or a number of different tasks.

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


Worksite: The location of the activity, work or tasks.

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Appendix 2 – Group CoW Standard Required Elements mapped to USPL Policies & Procedures

The following shows where the requirements of the 12 elements of the BP Group Defined Practice, Control of Work addressed within the USPL Control of Work Policies and Procedures.

GDP Element #	Element Title	Where addressed in USPL Policies & Procedures
3.1	Control of Work Policy	This USPL Control of Work Policy and associated policies and procedures satisfy this requirement.
3.2	Accountabilities	Sections 2.0 and 3.0 of the CoW Policy define the responsibilities and accountabilities for this policy and control of work. The Roles and Responsibilities are defined in each CoW policy and procedure.
3.3	Training and Competence	The USPL Training and Competency Matrix defines the CoW role specific requirements. Training for BP employees is documented via the learning management system. Training for contractors is documented via the contractor management process.
3.4	Planning and Scheduling	The USPL Work Management Process as defined in 4.10.3 defines how work is planned and scheduled to account for interactions of work tasks.
3.5	Task Based Risk Assessment	The USPL ATW Policy as defined in 4.10.1 of the CoW Policy defines the requirement and procedures for conducting Level 1 Risk Assessments. Level 2 Risk Assessment requirements and procedure are defined in the Level 2 HITRA Procedure.
3.6	Permit to Work	The USPL ATW and Permit Policies as defined in 4.10.1 and 4.10.5 provides requirements for permitting work.
3.7	Authorization and Communication	The USPL ATW Policy and Level 2 HITRA Procedure as defined in 4.10.1 and 4.10.7 defines the requirements for defining work scope, identifying hazards, conducting risk assessments, identifying risk mitigation measures and communicating all to those involved with the task.
3.8	Monitoring of Work Activity	The USPL ATW Policy and Level 2 HITRA Procedure as defined in 4.10.1 and 4.10.7 defines the requirements for monitoring of work being

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		performed.
3.9	Work Completion and Close Out	The USPL ATW Policy as defined in 4.10.1 defines the requirement for leaving work sites in a safe condition on completion or interruption of work.
3.10	Auditing	The USPL Self Audit and Assurance Procedure as defined in 4.10.12 defines the requirements and procedures for conducting regular auditing.
3.11	Lessons Learned	The USPL Lessons Learned Procedure as defined in 4.10.9 defines the requirements and procedures for how internal and external lessons learned are captured, incorporated and shared.
3.12	Stop Unsafe Work	The USPL Stop Work Procedure as defined in 4.10.10 defines the process for stopping and reporting unsafe work.

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Appendix 3 – Alignment of Group and USPL Role Titles

CoW Role Title	USPL Role Title
Permit Authority	District Operating Manager
Area Authority	Asset Operator
Affected Area Authority	Asset Operator
Performing Authority	Performing Authority
Authorized Gas Tester	Authorized Gas Tester
Isolating Authority	LOTO PIC
Responsible Electrical Person	Electrician
Firewatcher	Fire watch
Control Room Operator	Controller