

Incident Reporting

1. Purpose

The purpose of this policy is to set forth the requirements for the reporting, notification and recording of all incidents.

2. Scope

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

3. Minimum Requirements

	Minimum Requirements	Supporting Documentation
1.	All incidents, and agency visits shall be reported as soon as practical to the appropriate Supervisor, who shall then continue reporting per the requirements in Appendix I.	Sections 5, 6-18, Appendix I
2.	All incidents, agency visits and actions shall be documented in IRIS within three business days.	Sections 6-18
3.	All federal, state, and local reporting or notification requirements shall be followed.	Sections 7-14
4.	All alleged employee injury and illness incidents shall be reported to the Health Services Advisor and USPL's third-party Workers' Compensation administrator.	Section 8
5.	Recordable injuries shall be added to the facility's OSHA 300 Log within seven days of learning about an incident.	Section 7
6.	The OSHA 300A Summary shall be posted no later than February 1 of the year following the year covered by the records and kept in place until April 30.	Section 7

4. Definitions

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

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

- (1) Has a gross vehicle weight rating or gross combination weight rating, or gross vehicle weight or gross combination weight, of 4,536 kg (10,001 pounds) or more, whichever is greater; or
- (2) Is designed or used to transport more than 8 passengers (including the driver) for compensation; or
- (3) Is designed or used to transport more than 15 passengers, including the driver, and is not used to transport passengers for compensation; or

(4) Is used in transporting material found by the Secretary of Transportation to be hazardous under 49 U.S.C. 5103 and transported in a quantity requiring placarding under regulations prescribed by the Secretary under 49 CFR, subtitle B, chapter I, subchapter C.

Compliance Notice—A written communication received by BP (or by the non-BP operator of a joint venture or other such arrangement in which BP participates, that is within BP's HSE reporting boundaries) from a local or national government agency, comprising either a Notice of Violation (NOV) or a Compliance Order.

A NOV, for these purposes, is a communication that states an alleged HSE or operations non-compliance. A compliance order, for these purposes, is a communication that sets out HSE or operations-related conditions or requirements which must be met in order to continue in operation or to avoid fines or penalties. The NOV or order relates to alleged legal non-compliance or unsatisfactory operation of the site or activity. The metrics are tracked according to the date that the formal notice is received.

Confirmed discovery—When it can be reasonably determined, based on information available to BP at the time a DOT reportable event has occurred, even if only based on a preliminary evaluation.

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

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

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

- An exceedance of a permit emission limit/condition (mass or concentration emission limit exceedance) from a government agency (local or national) (Permit/Regulatory/Statutory exceedance), and/or
- A spill/release that is equal to or exceeds any reportable quantities as established by local or national government (loss of containment – reportable quantity exceedance).

If reportable quantities spill/release also results in a permit exceedance, the incident should be reported as a permit exceedance. Government reportables are based on the date that the incident occurred.

High Potential (HiPo) incident— An incident with a potential severity of A-E (that is not a Major Incident (MI)).

Note: Where potential severity A-E is financial only, incidents are only HiPos when they are also Process Safety Related (PSR).

Principles

The intent of these principles is to have more consistent classification of HiPo incidents for the purposes of reporting.

Note: both the principles and the criteria should be used when evaluating an incident.

1. The learning value of an incident does not affect the decision on HiPo classification.
2. HiPo classification retains an element of 'judgment'.
3. The judgment is based on the consequences that in different circumstances 'could reasonably result' from the event and the robustness of barriers in place.
4. FAQ/ examples using BP risk information and industry experience can be used to help inform the classification decision.

If however a Business feels an Unsafe Act or Unsafe Condition warrants a response equivalent to an incident, they may choose to respond as if there had been an incident (including entering in IRIS as an Incident without Consequence (a Near Miss)).

Criteria

The event needs to meet the BP definition of Incident and at least one of the below:

- The incident was associated with a “risk event” in the entity risk register with a potential A-E impact.
- Barriers 1 were not in place and/or not functioning, such that an A-E consequence could reasonably have occurred.
- In different circumstances an A-E consequence could reasonably have occurred.
- There is an equivalent example in the list of example incidents (link: [Guidance for potential severity A-D or E incidents \(HiPos\)](#)).

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

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

Note: Incidents include:

- Incidents with consequence (accident)
- Incidents without consequence (near miss).

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

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

Loss of Primary Containment (LOPC)—An unplanned or uncontrolled release of material from Primary Containment. This includes non-toxic and non-flammable materials (e.g. steam, hot water, nitrogen, compressed CO₂ or compressed air). For additional guidance, refer to Reporting of a Loss of Primary Containment (LOPC) Incident (link: [Reporting of a Loss of Primary Containment \(LOPC\) Incident](#))

To record an incident as an LOPC, it needs to be an incident and so minor steam leaks and drips and fugitive emissions are not included. An incident is defined as an unplanned event or chain of events that affects or has the potential to affect the health, safety or security of: people, or assets, or the environment.

Permitted environmental emissions and exceedances are not an LOPC where they are planned and controlled.

Acute flow - The calculation of LOPC ‘severity’ is based on the acute flow from primary containment.

The use of acute flow is a way of acknowledging that slow, long-term releases that are able to diffuse away, or be easily dispersed, are potentially less hazardous than sudden releases of significant amounts.

Acute flow is the maximum quantity of material released in any one hour period. It is only relevant if the release duration is longer than 60 minutes. If the release duration of the material is less than one hour, then the total amount released is the quantity that is used to determine the severity of the LOPC.

Major incident (MI)— An incident with consequence that has an actual severity A-E.

Note 1: Where actual severity A-E is financial only, incidents are only Major Incidents when they are also Process Safety Related (PSR).

Note 2: The announcement of a major incident is referred to as an MIA.

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

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

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

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

Near miss (also referred to as Good Catch in USPL, and Incident without consequence in IRIS)—

An incident that did not, but had the potential to, affect the health, safety or security of:

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

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

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

Process Safety Event (PSE)—

Tier 1 – A Tier 1 PSE is an unplanned or uncontrolled release of any material, including non-toxic and non-flammable materials (e.g., steam, hot condensate, nitrogen or compressed air), from a process that results in one or more of the consequences listed below:

- an employee, contractor or subcontractor ‘day away from work’ injury and/or fatality; or
- hospital admission and/or fatality of a third party; or officially declared community evacuation or community shelter-in-place; or
- fires or explosions resulting in greater than or equal to \$100,000* of direct cost to the Company; or
- a pressure relief device (PRD) discharge to atmosphere greater than the threshold quantities described in Table 1 of API RP-754 that:
 - contained liquid carryover; or
 - was discharged to an unsafe location; or
 - resulted in an onsite shelter-in-place; or
 - resulted in public protective measures (e.g. road closure); or
- a release of material greater than the threshold quantities described in Table 1 of API RP-754 in any one-hour period. (See Appendix VIII.)

Tier 2 - A Tier 2 PSE is an unplanned or uncontrolled release of any material, including non-toxic and non-flammable materials (e.g., steam, hot condensate, nitrogen or compressed air), from a process that results in one or more of the consequences listed below and does not fall within the definition of a PSE Tier 1:

- an employee, contractor or subcontractor recordable injury; or
- fires or explosions resulting in greater than or equal to \$2,500 of direct cost to the Company; or
- a pressure relief device (PRD) discharge to atmosphere greater than the threshold quantities described in Table 2 of API RP-754 that:
 - contained liquid carryover; or
 - was discharged to an unsafe location; or
 - resulted in an onsite shelter-in-place; or
 - resulted in public protective measures (e.g., road closure); or
- a release of material greater than the threshold quantities described in Table 2 of API RP-754 in any one-hour period. (See Appendix VIII.)

Tier 3 - A Tier 3 PSE typically represents a challenge to the barrier system that progressed along the path to harm, but is stopped short of a Tier 1 or Tier 2 PSE consequence. Indicators at this level provide an additional opportunity to identify and correct weaknesses within the barrier system.

Tier 4 - Tier 4 PSE indicators typically represent performance of individual components of the barrier system and are comprised of operating discipline and management system performance.

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

Quality incident—An event in which one or more of the following criteria is met:

- An off-specification product, regardless of the dollar volume involved, reaches an internal or external customer.

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

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

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

- The reputation of the brand is at risk.

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

- More than \$25,000 equipment and property damage.
- At least a minor supply disruption or issue.

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

• Less than \$50,000 business value.
• Less than \$25,000 equipment and property damage.
• Off-spec material may reach an internal or external customer.
• Little or no supply issues.

- No media involvement or impact on the BP brand or corporate image.

Security incident—Any attempted or successful unauthorized access, use, or destruction of company property or interference with company operations and personnel. Examples include assault, threat, burglary, civil unrest, criminal property damage, drug or alcohol abuse or possession, kidnapping, extortion, product contamination threat, robbery, information breach, terrorist or guerrilla activity, and theft.

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

- BP workforce fatality, Days Away From Work case, or Recordable injury associated with the vehicle accident
- Third party fatality associated with the vehicle accident
- Vehicle rollover, where the vehicle involved is operated by a member of the BP workforce.

Note: SVAs are to be recorded in IRIS with a severity level of at least G. Reference Appendix VII for Guidance on actual and potential severity levels associated with SVAs. See the vehicle rollover definition for guidance on severity level when reporting vehicles rollovers.

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

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

Vehicle accident—An accident involving a motor vehicle being operated by a member of the BP workforce while undertaking business travel that occurs on or off-road resulting in injury, or loss/damage, or harm to the environment, whether this impacts BP and/or its contractor directly, or impacts a third party.

It excludes accidents:

- Where the BP workforce vehicle was properly parked.
- Where injuries occur when entering or exiting the vehicle.
- Involving loading or unloading from the vehicle when it is properly parked.
- Involving only minor wear and tear (e.g., stone damage to a windscreen, minor paintwork damage).
- Minor damage, e.g. less than \$500, caused solely by striking road debris.
- A construction-type vehicle is being used in the construction mode.
- Vehicle undercarriage damage caused by bottoming out on the right-of-way.

It also excludes incidents involving damage which is solely the result of vandalism, theft or environmental conditions.

Vehicle accident (At Fault or Preventable) —Used to assess responsibility for vehicle accidents. This generally means it was determined that the driver did not follow the defensive driving principles of the USPL Driving Safety Training, that could have prevented the accident, regardless of whether the driver was or was not issued any citations.

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

Note: A workforce vehicle rollover is to be recorded in IRIS with an actual severity level of at least F and would normally be recorded with a potential severity level of at least E and as such reported as a HiPo.

Workforce—Any BP employee or contractor who is engaged in performing work on behalf of USPL. For more specific information, see Work-related Boundary and Operational Boundary definitions in HSE Definitions Document (link: [RCD 4.4-0001 HSE Definitions Dictionary](#)).

5. Roles and Responsibilities

5.1. All Employees shall:

- A. Verbally report all HSSE incidents to their Supervisor as soon as practical.
- B. Assist in mitigating the incident consequences as appropriate while maintaining a safe distance.
- C. Assist in completing employee-related incident documentation, e.g., written statement of events, IRIS entry.

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

- A. Report all contractor-related incidents to BP operations management in accordance with [Section 17](#) of this policy.

5.3. BP Supervisors shall:

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

Note: Operations supervisors are accountable for reporting all workplace incidents. On a greenfield project not directly associated with an Operations asset, the EPIC Project Manager is accountable for reporting all workplace incidents.

- B. Ensure that external parties are notified as necessary (e.g., local emergency response, agencies, contractors, etc.).
- C. Ensure that the incident scene is secured and appropriate actions are initiated.
- D. Ensure completion of documentation associated with an incident (e.g., injury report, OSHA Incident Report, spill report forms, IRIS entry, etc.).
- E. Ensure that reports are updated as necessary (e.g., number of days restriction, spill volumes, OSHA 300 Log, etc.).
- F. Post the annual OSHA 300A Summary.
- G. Provide case management under the direction of the Health Services Manager and contact the Workers' Compensation provider.
- H. Report tank High-High level alarms and the investigation results into IRIS as Incidents without consequence. (Link: [SOP Accuload and TMS Alarm Management SOP](#))
- I. Verify integrity management related TMS alarms are reported into Maximo. (Link: [SOP Accuload and TMS Alarm Management SOP](#))
- J. Report excursions outside the Safe Design Limit (SDL) or Safe Operating Limit (SOL) per USPL STP 48-101, Defining Operating Limits, **and the requirements of section 10.4**. (Link: [USPL STP 48-101, Defining Operating Limits](#)).
- K. Report pressure relief valve defaulters' (i.e. valves that fail test procedure) investigation results into IRIS as an Unsafe condition. (Thermal relief valves are excluded.)
- L. Notify Environmental Coordinator of any environmental permit exceedance.
- M. Ensure there are no repercussions or retaliation against a member of the BP workforce for reporting an incident or unsafe / unhealthy condition.
- N. The DOM is responsible for preparing the communication within 48 hours of OSHA recordable injuries to alert entity staff, and raise awareness to prevent similar incidents, assuming there is reasonably sufficient information to do so.

5.4. DOT Compliance Advisors, Environmental Coordinators, Safety Coordinators, Road Safety Advisor, Security Authority, and Crisis & Continuity Management Advisor shall:

- A. Continue upward and lateral verbal reporting of all incidents per Appendix I.
- B. Provide immediate advice of other verbal reporting requirements, both internal (e.g., BP Notification Center) and external (e.g., federal, state, and local agencies). In the event of a spill or release, external reporting should follow the detailed requirements spelled out in the Facility Response Plan, OMER Manual, SPCC Plan or permits with additional assistance from the Legal Department as necessary.
- C. Serve as the IRIS Incident Manager (if trained).
- D. Make IRIS entry in accordance with Regulatory Visits and Compliance Notices below.
- E. Assist as necessary to ensure the proper and correct documentation of an incident, including internal documentation (e.g., IRIS and external agency reporting requirements e.g., OSHA 300 Log, DOT Form 5800.1 for transportation incidents, DOT Form 7000.1 for pipeline incidents, Industrial Discharge reports exceeding permit conditions, breakdown notifications, Title V Permit deviations and/or GD GACT reporting to US EPA etc.) are completed in a timely manner.

5.4.2. Environmental Coordinators shall:

- A. Verify that the Spill Prevention, Control, and Countermeasure (SPCC) Plan is revised within 60 days following an incident involving discharge of product to navigable waters or adjoining shorelines and as appropriate provide information to the US EPA Regional Administrator in accordance with 40 CFR 112.4(a).
- B. Verify that incidents requiring external agency reporting or notification criteria are addressed promptly.
- C. Ensure that incidents involving malfunction of equipment in gasoline and gasoline vapor service that occur at terminals, pipeline breakout and pumping stations are properly documented per Environmental Incident section below (i.e. GD GACT documentation).
- D. Report non-compliance issues which involve self-reporting with potential regulatory consequences, to the Supervisor responsible for the asset and the Environmental Team Leader.

5.4.3. Safety Coordinators shall:

- A. Assist the Supervisor in completing OSHA 300, 300A, and 301 forms.
- B. Audit OSHA 300 logs as identified in assigned Compliance Task Management tasks.
- C. Provide advice for any incident involving objects falling from height using the BP 'Dropped Objects Calculator' to determine the potential severity level.

5.4.4. Road Safety Advisor shall:

- A. Maintain the DOT Accident Register.

5.5. HSSE Performance Analyst shall:

- A. Verify and track incident documents and reports.
- B. Serve as USPL's IRIS Coordinator.

5.6. Health Services Advisor shall:

- A. Provide immediate and ongoing advice regarding case management of work-related injuries and illnesses.

5.7. HSSE Manager shall:

- A. Verify the completeness and accuracy of actual and potential severity (see Appendix XI) classifications of incidents as required by USPL, Group BP, and all regulatory agencies.
- B. Assist Supervisors in drafting Major Incident Announcements, High Potential Announcements, and Lessons Learned Summaries.
- C. Notify BP Legal of any incident if litigation or regulatory action is possible.
- D. Make the final determination of all unresolved recordability issues in consultation with the appropriate operations manager/department head and Head of Operations & HSSE or their delegates.

Note: This includes making determinations before all information is available in order to meet reporting deadlines, and updating reported information if new information changes the reporting category.

- E. When necessary, request clarification from group S&OR on recordability issues.
- F. Verify the correct determination of Process Safety Events.

5.8. Leadership Team Member

- A. Approve closure of all IRIS action items associated with HiPo and Major incidents.

5.9. Head of Operations & HSSE shall:

- A. Review and distribute all Group Notifications and Lessons Learned Summaries.
- B. Consult with the Segment Marine Authority for all Major and HiPo marine incidents.

5.10. Entity Leader (Vice President, USPL)

- A. Obtain agreement of the relevant Downstream business facing VP S&OR on the classification of actual and potential severity Level A through E incidents.
- B. Obtain agreement of the Entity Director S&OR on the classification of actual severity level F and G incidents.
- C. Notify through personal conversation the Chief Operating Officer Fuels Value Chain, the Head of S&OR Downstream, and BP Legal of any incident meeting the Group Notification criteria.
- D. Notify incidents that meet the Group Notification criteria.
- E. Make all reasonable attempts to establish contact with injured parties in order to express concern, offer support, and gain understanding of the incident.
- F. Accountable to issue a communication within 48 hours of OSHA recordable injuries to alert entity staff, and raise awareness to prevent similar incidents, assuming there is reasonably sufficient information to do so.
- G. Within the initial 48 hour period of OSHA recordable injuries, the entity leader should arrange for distribution of the entity notification to the NA Fuels LT.

5.11. IRIS Responsible Leaders shall:

- A. Reviews IRIS reports and evidence of action items completed for accuracy, completeness, and validity before approving.

6. Incident Reporting - General

6.1. All Incident Scenes

- A. To the extent practical, the following actions shall be taken immediately after the incident has occurred:
 - 1. Follow local plans for incident response.
 - 2. Secure the incident scene as appropriate.
 - 3. Photograph, videotape, and/or sketch the incident scene.
 - 4. Obtain a written, on-the-spot account of the incident from each eyewitness. The Response Log (ICS 214) may be used for this purpose.
 - 5. Collect or make copies of the following:
 - a) Log book entries, hard copies of data and trend plots stored in the computer, printouts of alarm summaries, written orders, standard operating instructions, standard maintenance instructions, training guides, and any similar information that may pertain to the incident
 - b) Any procedures that were being used or could have been used
 - c) Relevant permits and work orders
 - d) Weather conditions (e.g., wind speed and direction, humidity, temperature, etc.)
 - e) Comments about the physical condition of the incident site (housekeeping or other)
 - 6. Survey the area and record the following information, if relevant:
 - a) Position of control valves, manual valves, and relief valves; state of control valves (manual, auto, bypassed, or hand-jacked)
 - b) Activated trips and alarms
 - c) Inoperable equipment, especially alarms
 - d) Names of all personnel who were in the area, their position or function, and their company
- B. For major incidents and Process Safety Events (PSE) Tier 1 incidents, and where BP has the ability to dictate the use of the incident scene, it shall be released for resumption of work only with the approval of the certified Master Investigator assigned to investigate the incident.
- C. For any type of incident where a 3rd party (member of the public) has been injured or sustained property damage, a notification shall be made to ESIS, our 3rd party claims administrator. A completed accident report (e.g., using IRIS) shall be faxed to ESIS.
 - 1. Fax the report to ESIS at: 800-231-8506; or phone: 913-491-2269.
 - 2. For Pacific Northwest area, fax the report to the ESIS office in Woodland Hills, CA (fax: 818-593-4470; phone in CA: 800-654-5374; phone outside CA: 800-233-3869).
- D. For any type of incident involving objects falling from height, the BP 'Dropped Objects Calculator' shall be used as one criteria to consider for the assessment of potential severity. The calculator is located in the Incident Reporting folder, under HSSE Policies in DRM.

6.2. Incident Notification

- A. Notify incidents that meet the Group Notification criteria in Annex A of GDP 4.4-0001 Reporting of Incidents as summarized below:
 - 1. Major incidents as defined in FIN-RD 4.4-0001 HSE Reporting Definitions (see definition in section 4).
 - 2. Incidents with a potential severity of A-E.

3. Process Safety Event (PSE) Tier 1 incidents as defined in FIN-RD 4.4-0001 HSE Reporting Definitions (see PSE definition in section 4).
 4. Other incidents that in the view of the entity leader or deployed S&OR VP are considered significant enough to notify to executive management and S&OR leadership.
- B. Notification shall be by e-mail using the TMP 4.4-001 Incident Notification Form (Link: [BP Incident Notification form](#)) within 24 hours to distribution list “G Downstream Incident Notification.”
- C. For Security related incidents:
1. Due to the possible nature and confidentiality associated with a security incident, special arrangements could be required for their notification.
 2. For security related incidents that might not be in the public domain, BP leaders to privately and securely, if possible, communicate with the following:
 - a) Regional security advisor.
 - b) Relevant segment or function designated executive line management.
 - c) Group head of Intelligence, security & crisis management.
 - d) Group Head of Operational Risk: Process Safety Engineering & HSE.
 3. Regional security advisors inform additional senior leadership on a need-to-know basis or based on who can advise or help.
- D. Consult promptly with BP Legal with regard to any incident:
1. That requires Group Notification and/or
 2. When litigation or regulatory action is possible.
- E. The relevant deployed S&OR VP shall have the authority to escalate the level of incident notification.

6.3. Incident Recording

- A. Incidents shall be recorded in IRIS.
- B. Incidents shall be classified in accordance with FIN-GDP 4.4-0001-01 HSSE & Operational Data Reporting Requirements for BP Group.
- C. The individual designated as the IRIS Incident Manager shall be accountable for confirming the completeness and accuracy of the incident record in IRIS.
- D. BP entity leaders shall obtain the agreement of the relevant deployed S&OR VP of the classification of incidents of actual severity levels A-F or potential severity A-E.

6.4. Notes

- A. The intent of incident notification is to:
 1. Inform line management, S&OR and other relevant functions of incidents that they might ‘need to know’ for the purpose of mitigating potential impact on BP operations or reputation and/or
 2. Provide support to the entity response to the incident, including the investigation.
- B. Group level notification is for events that are considered significant enough to notify to executive management and S&OR leadership.
- C. Due to the importance of prompt notification, if there is doubt as to whether or not an incident requires Group or entity notification, the precautionary principle is to be followed and the notification made to the highest appropriate level. The level of notification does not define the final classification of an incident.

7. Occupational Injuries and Illnesses

7.1. General Requirements

- A. Employees shall verbally report all alleged work-related injuries and illnesses as soon as practical to their supervisor, no matter how minor they may appear and regardless of when or where the symptoms first appear. Additionally, employees should report personal injuries that may affect job performance to their supervisor so the supervisor can take proactive steps to ensure the work environment doesn't aggravate the injury.
- B. Each contractor employee (including subcontractors' employees) shall notify BP site management and the contractor supervisor as soon as practical of any injury or illness sustained while performing work in the BP work environment.
- C. The supervisor shall then make the appropriate notifications in accordance with the Incident Reporting and Documentation Summary (Appendix I) if the alleged condition was potentially caused or aggravated by the work environment.
- D. The supervisor is accountable for completing the initial entry in IRIS for any injury or illness, including first aid cases, for both employee and contractor injuries.
- E. Any fatality associated with BP operations shall be reported up to the Entity Leader within one hour.

7.2. OSHA Requirements

- A. Injuries and illnesses that meet OSHA's guidelines for recordability shall be recorded on OSHA's Form 300, "Log of Work-Related Injuries and Illnesses," and Form 301, "Injuries and Illnesses Incident Report." Recordable injuries shall be added to the OSHA 300 log within seven days after the Supervisor has learned about an incident.
 - 1. If the work-relatedness of an injury or illness is questionable, the incident shall be recorded on the OSHA 300 log within seven days, but may later be lined out if an investigation of the injury or illness has determined it to be not work-related.
 - 2. The OSHA forms 300 (log) and 301 (report) shall be kept up to date. The facility Supervisor is responsible for this requirement for all employees considered based at the facility.

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

- a) In January, access the OSHA 300 Log Template in the Domain site's OSHA folder in DRM.
- b) Print the OSHA Form 300 worksheet, OSHA Form 300A worksheet, and OSHA Form 301 worksheet. Enter the Year, Establishment name, City, and State on the OSHA Form 300. The NAICS number for completion of the OSHA Form 300A is 486110 for Petroleum pipelines, crude, 486910 for Petroleum pipelines, refined, or 424710 for Terminals, petroleum.
- c) Keep the paper forms in a local file for the year, and update the OSHA Form 300 for any OSHA recordable injuries within seven days. You will also need to fill in the OSHA 301 worksheet for each injury.
- d) In January of the following year, finish completing the OSHA Form 300 by adding up the columns and writing the total numbers on the Page totals row. Complete the OSHA Form 300A worksheet including the number of cases, days and types, and the establishment and employment information, then the signature information. See paragraph C below for OSHA Form 300A posting requirements.
- e) The completed OSHA 300, 300A, and all supporting 301 Forms must be uploaded to the Domain site's OSHA folder in DRM. The choices are to scan the OSHA forms and upload them as one appropriately named document, e.g. OSHA Log 2014. Alternately, the OSHA 300 Log Template can be downloaded from DRM, completed as a computer

worksheet (some fields auto-populate), then the workbook can be printed, signed, scanned and uploaded. Safety Coordinators and Document Coordinators can assist.

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

- B. The Supervisor shall notify the nearest office of OSHA's Area Director within 8 hours for all employee work-related fatalities, and within 24 hours for all employee work-related hospitalizations, amputations, or loss of an eye. The contractor is responsible for making the appropriate notifications for contractor worker injuries.
 - 1. A verbal report shall be made to the OSHA office nearest the incident or to OSHA's toll-free central telephone number at 1-800-321-OSHA (1-800-321-6742).
 - 2. If the incident occurred in a state with an OSHA-approved state plan (AK, AZ, CA, IN, IA, KY, MD, MI, MN, NV, NJ, NM, NY, NC, OR, SC, TN, UT, VA, WA, WY), contact the local OSHA administrator.
 - 3. The information requested by OSHA includes: establishment name, location and time of the work-related incident, type of reportable event, number and names of employees who suffered the event, contact person and his or her phone number, and a brief description of the incident.
- C. The Supervisor is responsible for ensuring that the OSHA 300A summary is posted no later than February 1 of the year following the year covered by the records; the posting shall be kept in place until April 30.
- D. These OSHA forms shall be maintained for five years in DRM.

7.3. NA Fuels Recordable Injury Response Protocol

- A. Within 48 hours of the injury being reported (including holidays and weekends), the Entity Leader or designate, should make all reasonable attempts to establish contact with the injured party in order to express concern, offer support, and gain understanding of the incident. In the event of an injury to a contractor, such contact should be made in conjunction with the contractor's senior management.
- B. The Entity Leader or designate should visit the location where the injury occurred as soon as reasonably possible in order to gain a first-hand understanding of the incident.
- C. A USPL communication should be issued within the 48 hour period to alert entity staff, and raise awareness to prevent similar incidents, assuming there is reasonably sufficient information to do so. And when the facts are reasonably known, the communication should include a preliminary assessment of the barriers that should be in place to prevent a similar event from occurring.
- D. Within the initial 48 hour period, the Entity Leader should arrange for distribution of the entity notification to the NA Fuels LT.

8. Case Management

8.1. General Requirements

- A. Once an employee alleged injury or illness incident occurs (regardless of how minor), the USPL Health Services Advisor shall be contacted per Appendix I to provide guidance and assistance.
- B. Contractors are responsible to provide their own case management. USPL does not require a medical "return to work" document from contractors returning to USPL work sites after an injury.

8.2. Reporting Employee Workers' Compensation Claims

ESIS administers Workers' Compensation claims for USPL employees according to the respective State Workers' Compensation Act, but uses an intake vendor called **NetClaims**. **NetClaims prepares the**

appropriate State form and provides notification to ESIS, who is responsible for providing notification to the State. A claim number is assigned which ESIS sends to the Supervisor reporting the claim.

- A. If a BP employee experiences an alleged work-related injury or illness, the Supervisor shall report the incident to ESIS by submitting the ESIS Claim Intake information. ESIS will investigate the claim to determine compensability and payment of benefits, if applicable. Report the claim (in order of preference) by:
 1. Email - Complete the ESIS Claim Intake form and send it via email to: esisclaims@tnwinc.com.
 2. FAX - Complete the ESIS Claim Intake form and fax it to: 800-748-6159.
 3. Call - Call 888-499-5522 and be prepared to answer the questions listed on the ESIS Claim Intake form.

8.3. Supervisor's Role for Employee Case Management

- A. The employee's Supervisor shall obtain a clear understanding of what occurred.
- B. The Supervisor (or designee) shall:
 1. Unless immediate medical attention is necessary, contact the Health Services Manager after learning of the incident but no longer than one hour afterward. The Health Services Manager will provide guidance to the Supervisor on medical issues including the need to be evaluated by a medical professional.
 2. Provide for appropriate medical attention for any injured or ill employee.
 - a) Ask the employee to go to a company-approved occupational health clinic first unless the injury warrants direct referral to an emergency room.
 3. Accompany the employee to the hospital or occupational clinic to:
 - a) Ensure a complete understanding of the treatment and any employee restrictions. This will aid in determining OSHA recordability and enable the Supervisor to assist the employee in adhering to any restrictions.
 - b) Explain the types of restricted work or modified duty that may be available if the employee is deemed fit to return to work with restrictions.
 4. Consult with the employee and medical provider on the timing and conditions for a return to work, as appropriate. Obtain clarification for vague recommendations such as "employee should stay home from work" or "only work modified duty."
 5. Maintain contact with the Health Services Manager concerning the employee's rehabilitation until normal duties are resumed.
 6. If the injury requires four or more consecutive calendar days away from work, complete the Family Medical Leave of Absence (FMLA) request in MyHR portal and send a separate email to the Health Services Manager.

8.4. Contract Employee Case Management

- A. Each contractor worker (including subcontractors' workers) shall notify BP site management and the contractor supervisor as soon as practical of any injury or illness sustained while performing work in the BP work environment.
- B. Contractor workers are expected to follow their own medical treatment policies and plans in the event of an injury or illness.
- C. BP site management shall properly record the injury or illness internally in IRIS and report upward within line, HSSE, and EPIC organizations as appropriate.
- D. Contractor companies are expected to provide their own case management for their employees' medical situation and return-to-work status.

- E. Contract workers are required to produce a note of medical clearance to the BP job rep prior to returning to the BP job site after any significant injury or illness. The note is shown to the BP job rep and then returned to the worker. This includes work related and non-work related issues.

9. Vehicle Accidents Involving BP Employees

9.1. All Vehicles

- A. A BP employee who is involved in a vehicle accident while operating a company-owned, leased, or rented vehicle, or while operating a personal vehicle used for company business, shall report the accident as soon as practical to his or her Supervisor.
- B. Local police shall also be contacted following a vehicle incident occurring off of BP property. If the state has notification requirements for vehicle accidents exceeding a certain dollar value in damage or resulting in personal injury, the Supervisor and the employee involved in the accident shall complete and submit any applicable forms.
- C. The Supervisor shall report the incident to management in accordance with the Incident Reporting and Documentation Summary (Appendix I).
- D. The employee is accountable for the completion of the initial IRIS entry. For contractor accidents, the Team Leader is responsible for the initial IRIS entry.
- E. If applicable, the BP employee shall obtain personal and insurance information from the other motorist involved in the accident and, if applicable, the names and addresses of any witnesses, copies of police reports, and any other related information including photographs of the accident scene.
- F. Damage to any vehicle leased from Wheels shall be reported to Wheels at 866-482-GOBP (866-482-4627) within 24 hours. Wheels will notify ESIS for any incidents involving third parties.
 - 1. Employees shall complete the Wheels' Vehicle Damage Report and fax it to Wheels.
 - 2. Employees shall secure the police accident report and send it to Wheels.
- G. A completed accident report (e.g., using IRIS) shall be faxed to ESIS for any incident involving third party damage.
 - 1. Pacific Northwest area, fax the report to the ESIS office in Woodland Hills, CA (fax: 818-593-4470; phone in CA: 800-654-5374; phone outside CA: 800-233-3869).
 - 2. All other USPL areas, fax the report to ESIS at 800-231-8506; or phone: 913-491-2269).
- H. All company light vehicles should be equipped with accident reporting instructions from Wheels. Contact the Road Safety Advisor if additional copies are needed.

9.2. Commercial Motor Vehicles Only

- A. Drivers of a commercial motor vehicle involved in a DOT accident shall undergo drug and alcohol testing within two hours of the accident. A DOT accident is defined as follows:
 - 1. It results in a fatality; or
 - 2. The commercial vehicle driver receives a citation for a moving violation; and
 - a) A person is injured in the accident and the injuries require immediate medical treatment away from the accident scene; or
 - b) One or more vehicles, including the commercial vehicle, incur disabling damage because of the accident and must be towed from the accident scene.
- B. If a required test is not administered within the prescribed time period, the Supervisor shall prepare and maintain on file a record stating the reason the test was not promptly administered.

- C. The Road Safety Advisor shall be notified for all accidents involving commercial motor vehicles and is responsible for ensuring that the DOT Accident Register is accurately maintained. All DOT vehicle accidents that occur on a highway in interstate or intrastate commerce and meet any of the following criteria shall be recorded on the DOT Accident Register:
 - 1. A fatality
 - Note:* The DOT defines a fatality as any injury resulting in the death of a person at the time of the motor vehicle accident or within 30 days of the accident.
 - 2. Bodily injury to a person who, as a result of their injury, immediately receives medical treatment away from the scene of the accident
 - 3. Disabling damage to one or more motor vehicles that requires the vehicle(s) to be transported away from the scene of the accident by a tow truck or another motor vehicle.
- D. See Appendix VI for further instructions if any of the following occurs involving a BP employee during loading, transportation, unloading, or temporary storage in which as a direct result of hazardous materials:
 - 1. A person is killed;
 - 2. A person receives an injury requiring admittance to a hospital;
 - 3. The general public is evacuated for one hour or more;
 - 4. A major transportation artery or facility is closed or shut down for one hour or more;
 - 5. The operational flight pattern or routine of an aircraft is altered; or
 - 6. A situation exists of such a nature (e.g., a continuing danger to life exists at the scene of the incident) that, in the judgment of the carrier, it should be reported to NRC even though it does not meet the criteria listed above.

10. Environmental Incidents

10.1. General

- A. All loss of primary containment (LOPC) events shall be reported in accordance with the requirements summarized in the Incident Reporting and Documentation Summary (Appendix I); this includes entering the incident into IRIS, and making the notifications and obtaining the documentation required by the OMER manual or Facility Response Plans.
- B. Federal, state, and local external reporting requirements exist for hazardous materials (including hazardous wastes) in various reportable quantities. The Environmental Coordinator/DOT Compliance Advisor shall be consulted regarding environmental release reporting requirements in accordance with Appendix I.
- C. The Supervisor responsible for the LOPC event shall use Appendix V to determine the minimum potential severity of any LOPC. Incidents involving equipment in gasoline service or gasoline vapor service, that occur at terminals, as well as pipeline breakout and pumping stations, shall be documented in a manner to identify malfunctions of process equipment, air pollution control equipment and monitoring equipment that cause or may have caused an applicable emission limit to be exceeded. This documentation shall include the occurrence and duration of the incident, a brief description of the incident and any corrective actions taken to minimize emissions and to return equipment to normal operations. These malfunction events will be reported to US EPA and local agencies on a semi-annual basis per 40 CFR 63. Malfunction means: Any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emissions limitations in an applicable regulatory standard to be exceeded.

- D. For releases from DOT jurisdictional equipment, the *Operations, Maintenance, and Emergency Response* (OMER) book contains additional spill and release reporting and response information that may be required. See Section 12, "Department of Transportation (DOT) Pipeline Reporting Requirements."
- E. Uncontrolled releases of product on top of an external floating roof will be reported as loss of primary containment (LOPC) if the amount is ≥ 5 gallons crude oil, or ≥ 42 gallons of finished products. However, any fugitive emissions that may be associated with this initial LOPC event that are generated from excess rim seal or deck fitting gaps of the floating roof do not need to be included in the estimate of LOPC.

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

- 1. Releases of product on top of an internal floating roof are not considered LOPC events, however management has requested these events be added into IRIS to document investigations and track corrective actions if the amount is ≥ 5 gallons crude oil, or ≥ 42 gallons of finished product.
- F. The BP Notification Center shall be notified within one hour of LOPC events meeting the reporting criteria in Appendix II ("BP Notification Center Call Requirements").

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

10.2. Process Safety Events

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

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

10.3. Process Safety Management Incidents - OSHA

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

10.4. Safe Design Limit (SDL) Excursions

- A. Refer to USPL STP 48-101, Defining Operating Limits (link: [USPL STP 48-101, Defining Operating Limits](#)) for definitions and additional instructions for reporting SDLs.
- B. In addition to other reporting, SDLs shall be entered into IRIS as Incidents with consequence, and should always be recorded as a process safety related event.

11. Regulatory Visits and Compliance Notices

11.1. Regulatory Visits

- A. For all agency visits or inspections when regulatory action is possible (including an off-site vehicle inspection by a regulatory agency but not meetings and conversations), the Supervisor and

appropriate Environmental Coordinator, Safety Coordinator, Road Safety Advisor, or Security Authority shall be notified of the visit or inspection and its outcome as soon as practical in accordance with Appendix I.

- B. The appropriate HSSE Coordinator shall enter the visit into **IRIS under Planned HSSE Events - Regulatory Inspection** within three business days.
- C. The agencies and their associated branch, area, or discipline include but are not limited to:
 - 1. Environmental Protection Agency (EPA) and state agencies—Air, water, waste, tanks, SPCC and emergency response, CERCLA, RCRA, TSCA
 - 2. Department of Transportation (DOT) and state agencies—Pipeline, road, rail and emergency response
 - 3. Department of Homeland Security (DHS) – Marine and security
 - 4. Occupational Safety and Health Administration (OSHA)—Safety and health
 - 5. U.S. Coast Guard (USCG)—Marine Operations, security, and emergency response
 - 6. Army Corps of Engineers
 - 7. Internal Revenue Service (IRS)—Taxed product (usually dyed)
 - 8. Department of Commerce (DOC)—Weights and measures
 - 9. Department of Energy (DOE)
 - 10. Nuclear Regulatory Commission (NRC)
 - 11. Federal Aviation Administration (FAA)—air shipments of hazardous materials
 - 12. State fire marshal and local fire departments—Pipelines, hazardous material storage, safety, fire protection, underground storage tanks
 - 13. State, county, and local law enforcement—Safety, security, protection, environmental and fuel quality

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

- A. Regulatory Notices of Violations, orders, and penalties include any official document from a regulatory agency that requires action to be taken by BP within a specified time frame. These include but are not limited to:
 - 1. Notice of Violation or Notice of Non-Compliance, Notice of Enforcement
 - 2. Notice of Excess Emission
 - 3. Notice of Deficiency
 - 4. Notice of Potential Violation or Notice of Alleged Violation
 - 5. Notice of Non Reporting
 - 6. Corrective Action Order, Compliance Order
 - 7. Improvement Notice, Notice to Comply, Notices and Warning Letters
 - 8. Cease and Desist Orders
 - 9. Administrative Consent Decrees
 - 10. Agency Partnership Agreements
 - 11. Citations and Fines (e.g., traffic, scale, OSHA, etc.)
 - 12. Delinquent Fee Notices
 - 13. Agency-initiated communications to BP regarding potential noncompliance issues

- B. Supervisors, upon receiving an NOV, order, or penalty, shall report it to the appropriate DOT Compliance Advisor, Environmental Coordinator, Safety Coordinator, Road Safety Advisor, or Security Authority as soon as practical. Supervisors shall then report and their next-level Supervisor within 8 hours. The Coordinator or Advisor, in consultation with their Manager, will work with the appropriate Supervisor and Legal Department to address the issue within the time frame specified by the agency.
- C. The applicable DOT Compliance Advisor, Environmental Coordinator, Safety Coordinator, or Road Safety Advisor shall enter the NOV, order, or penalty into **IRIS** under **Planned HSSE Events - Regulatory Inspection** and notify the HSSE Manager and DOT Programs Advisor by email within three business days. If the NOV is related to an incident, the NOV information will need to be entered with the incident information in IRIS, in the Compliance and community section of the Incident with consequence report.
 - 1. Attach a scanned copy of the original NOV, order or penalty letter into the report.
- D. The HSSE Manager shall confirm that NOVs, as soon as practical upon receipt, are entered into the USPL Notice of Violation SharePoint site via the following link: [Notice of Violation](#).
- E. The HSSE Manager shall complete a “Compliance Notice to USPL” **summary** for all **NOVs** (which are Orange Book reportable) and forward the completed summary to the **Director, Regulatory Affairs and Compliance - Fuels, North America**, VP- USPL, Head of Operations & HSSE - USPL and the USPL Entity Director. See the [Compliance Notice to USPL form](#) located in the Incident Reporting folder in DRM as a summary reference. Attach the completed “Compliance Notice to USPL” summary to the USPL Notice of Violation SharePoint site via the following link: [Notice of Violation](#). **The Compliance Notice to USPL summary includes the following items:**
 - 1. **Reason for the Notice of Violation**
 - 2. **Citation analysis**
 - 3. **Incident description**
 - 4. **Background**
 - 5. **Additional information**
 - 6. **Corrective actions**
 - 7. **Scanned copy of compliance notice.**
- F. After the NOV, order or penalty is resolved, the applicable DOT Compliance Advisor, Environmental Coordinator, Safety Coordinator, or Road Safety Advisor shall attach a scanned copy of any final response letter or communication submitted to the agency to the IRIS report. This document should summarize specific corrective actions taken to prevent likely reoccurrence of the compliance deviation.
- G. Discovery of a non-compliance issues which involve self-reporting with potential regulatory consequences, shall be reported to the Supervisor responsible for the asset and the Head of Operations & HSSE.

12. Department of Transportation (DOT) Pipeline Reporting Requirements

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

12.1. DOT Reporting

- A. A spill or other incident with any of the following outcomes requires telephonic notice to the National Response Center (NRC) (800-424-8802) at the earliest practicable time, but no later than **one** hour following **confirmed** discovery of the incident, regardless of the amount of available information:
1. Oil Release
 - a) An explosion or unintended fire occurs.
 - b) A volume of ≥ 5 gallons is released (5 bbls if result of maintenance work).
 - c) Damage to property, cost of clean-up, and product loss value exceed \$50,000.
 - d) A death or injury requiring hospitalization occurs.
 - e) The incident is deemed significant enough to be reported to the NRC even though none of the above outcomes occurred.
 - f) Any body of water is visibly polluted by a BP release.
 2. Gas Incident
 - a) Unintentional estimated gas loss of three million cubic feet or more.
 - b) Damage to property, cost of repair, and product loss value exceed \$50,000.
 - c) A death or injury requiring hospitalization occurs.
 - d) The incident is deemed significant enough to be reported to the NRC even though none of the above outcomes occurred.
- B. When making a telephonic notification, the caller should be prepared to provide the following information:
1. Name and address of the pipeline operator
 2. Name and phone number of the reporter
 3. Location and time of failure
 4. Injuries or fatalities
 5. Any other significant facts
- C. The employee reporting the spill shall record the NRC **report** number and the name of the NRC person taking the report. The employee shall notify the DOT Compliance Advisor anytime the NRC is notified.
- D. **Within 48 hours after the confirmed discovery of an incident, to the extent practicable, the DOT Compliance Advisor must contact the NRC to revise or confirm the initial telephonic notice with a revised estimate of the amount of product released, location of the failure, time of the failure, a revised estimate of the number of fatalities and injuries, and all other significant facts that are known by the operator that are relevant to the cause of the accident or extent of the damages. If there are no changes or revisions to the initial report, the DOT Compliance Advisor must confirm the estimates in the initial NRC report.**
- E. In addition to a telephonic notification, the DOT Compliance Advisors shall submit a written report within 30 calendar days of discovery. Form 7000-1 shall be used for an oil release, Form 7100.1 for a gas incident.
- F. As soon as possible after a pipeline accident, the Response Manager shall ensure that a documented accident analysis is completed using Form 195.402(c)(5), "Post-Accident Analysis and Response Procedure Review Checklist."
- G. Specific procedures regarding incident reporting may be found in Book 1 of *Operations, Management, and Emergency Response* (OMER) via the following link: [OMER](#).

- H. If the actions (or inactions) of a qualified individual (company or contractor) performing a covered task on a DOT regulated pipeline facility cannot be discounted as a contributing factor in an incident, that individual's qualification on that specific covered task will be immediately suspended by the Team Leader/Terminal Manager/Supervisor/ Manager or OQ Plan Administrator. The LMS Administrator and OQ Plan Administrator shall be notified immediately of the suspension. The suspension and recertification shall be documented. Refer to the BP USPL Operator Qualification Plan for more details on post-accident OQ evaluation.
- I. Drug and alcohol testing shall be conducted, within 8 hours (for alcohol) or 32 hours (for drugs), on each covered individual (company employee or contractor) whose performance of a covered function either contributed to or cannot be completely discounted as a contributing factor of a DOT pipeline accident that results in the release of product, gas, or LNG and
 1. Fire or explosion,
 2. Loss of 50 barrels or more of hazardous liquid or carbon dioxide,
 3. Escape to atmosphere of more than 5 barrels of highly volatile liquids,
 4. Death of any person,
 5. Bodily harm to any person,
 6. Estimated property damage (including cost of clean-up and recovery, value of lost product, and damage to property) that exceeds \$50,000,
 7. An emergency shutdown of an LNG facility, or
 8. An event that is significant in the judgment of the operator.

When there is sufficient information that establishes that a covered individual (company employee or contractor) had no role in the cause or severity of the accident, the covered individual does not need to be drug tested. The decision to not test an individual must be documented. See the appropriate OMER Book I procedure, P-195.402(c)(5) or P-192.617, for more details.

12.2. USPL Internal Reporting

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

13. Security Incidents

Accurate and timely reporting of security incidents that appropriate management and staff are apprised of losses and incidents; provides a database from which trends can be identified, appropriate responses developed, and resources allocated; and provides a permanent written record of the event or loss in case of subsequent litigation.

13.1. Security

- A. All security incidents shall be reported in accordance with the requirements set forth in Appendix I.

Note: The USPL *Security Manual* contains more information about our Security Program and can be found online. From the USPL home page, go to the Process tab, select HSSE - Safety & Operations

on the left, then select Security, then USPL Security Manual. Or click the following link: [USPL Security Manual](#).

- B. An IRIS report shall be completed for any security incident within three days of its occurrence.

14. Quality Incidents

14.1. Quality

- A. In the event of any Fuel Product Quality incident or a probable Quality incident or issue, the Supervisor involved shall promptly notify the:
 - 1. Global Fuels Technology Quality and Technical Service (Q&TS) team through the Q&TS Daytime Hotline Number at 800-841-5255, or the 24-hour phone at 800-237-9436, or directly contact the Global Fuels Technology Regional Technical Service Engineer;
 - 2. Operations & Maintenance Manager or equivalent; and
 - 3. Control Center (if the incident is a result of a controller error or SCADA problem).

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

- B. **Quality incidents are documented by the Global Fuels Technology Quality and Technical Services team and do not get recorded in IRIS by USPL.**

15. Rail Incidents

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

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

Note: Rail incidents that occur in transportation are not BP Recordable because they happen outside the BP work environment. However, they may be BP reportable if the financial and/or reputational consequences reach levels that trigger internal reporting.

16. Near Miss Incidents (Good Catches, Incidents without consequence) and Stop Work Interventions

- A. Employees are encouraged to report all near misses/Good Catches and stop work events to their Supervisor as soon as practical following the event.
- B. Near Misses/Good Catches and Stop Work interventions shall be reported through IRIS, as Incidents without consequence.
- C. Integrity management related near misses, e.g. tank high-high alarms and TMS alarms, require further investigation. Refer to the USPL-TOP-001-001, Tank Operating Philosophy, for additional High-High Alarm information. Because further investigation is required, integrity management near misses shall be reported as follows:
 - 1. Tank high-high level alarms shall be reported in IRIS as incidents without consequences.
 - 2. TMS alarms shall be reported in Maximo generating an inspection work order.

17. Contractor Incidents

- A. All contractor incidents shall be reported to the contractor's management and in accordance with the requirements set forth in Appendix I.
- B. Immediate notification of all contractor HSSE incidents involving EPIC-led work activities shall be made to the location Supervisor, and to the EPIC Supervisor.
- C. Management of the incident, including verbal and written notifications, shall be handled as follows:
 - 1. If the incident occurred on or at a USPL asset, the Operations Supervisor shall provide further verbal and written notifications (including IRIS) per Appendix I.
 - 2. If the incident did not occur on or at a USPL asset, the EPIC Supervisor shall provide further verbal and written notifications (including IRIS).
- D. The HSSE & Operational Incident Reporting Boundaries - GDP 4.4-0001-02 document in the Incident Reporting folder in DRM has additional information for determining which contractor incidents require further reporting within BP.

18. Electronic Group BP Reporting Requirements (IRIS)

18.1. Reporting Observations and Incidents

- A. All USPL incidents shall be entered into IRIS, regardless of USPL or Group BP recordability. The originator of the report must have an NTID.
- B. Specific information about the incident shall be recorded in IRIS within three business days of the incident.
- C. The main categories for IRIS entry are:
 - 1. Safe Act: An observed behavior that matches the expected safe way of working.
 - 2. Unsafe Act: An observed behavior that differs from the expected safe way of working.
 - 3. Unsafe Condition: A condition of equipment, procedure, process operations or working environment that could either result in an incident or make an incident more likely and/or severe.
 - 4. Incident without consequence (Near Miss): An unplanned event occurred that did not, but had the potential to impact health, safety or security of people, plant or the environment.
 - 5. Incident with consequence: An unplanned event occurred that impacted the health, safety or security of people, plant or the environment.
- D. The individual designated as the IRIS Incident Manager shall be accountable for confirming the completeness and accuracy of the incident record in IRIS.
- E. Following a root cause investigation, the IRIS report shall be updated to include additional information about the incident. Additionally, the approved Root Cause Analysis report, if a separate document, shall be electronically attached to the incident report in the IRIS system, and forwarded to the HSSE Performance Analyst.
- F. Incidents entered into IRIS shall have their *actual* severity classified in accordance with Appendix V.
- G. Questions regarding IRIS should be directed to the HSSE Performance Analyst.
- H. **The respective Leadership Team member is responsible for approving action items associated with HiPo and Major incidents.**

18.2. Other Planned HSSE Events

- A. Only individuals with the Planned Events Recorder security profile will see the Planned Events icons and can record and manage Planned Events.
- B. Recording a Planned Event is a two-step process. Step 1 is to record the basic information, together with the Focus Areas and associated Findings. Step 2 is to create actions against those findings.
- C. The following events should be recorded in IRIS following the instructions provided in the Resources page of IRIS:
 1. Self Verification
 2. Assurance
 3. Regulatory Inspection
 4. Emergency Exercise/Drill
 5. OMS Conformance
 6. Risk Review
 7. HAZOP
 8. LOPA
 9. PHSSER

19. Training and Competency

- A. USPL management shall complete a one-time training course on incident reporting requirements. This course educates Supervisors about their incident-reporting obligations within USPL.
- B. Non-supervisory USPL personnel shall complete a one-time training course that covers initial incident and agency action reporting.
- C. Employees who enter information in IRIS have available a training course that covers the basic functionality of IRIS.
- D. IRIS Incident Managers, Coaches, and Coordinators shall complete training on IRIS as specified by Group.

20. Sharing Incident Learnings

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

- A. The following methods shall be used for sharing learnings:
 1. IRIS shared learnings.
 2. MyHSSE toolkit is a monthly publication on various HSSE topics.
 3. The RCA Lessons Learned Data website contains finalized RCA reports. Navigate to this site from the USPL home page by selecting the Performance tab, then select USPL Performance, then HSSE Performance in the center of the page, then Links, then RCA Data; or click the following link: [RCA Lessons Learned Data](#).
 4. USPL Lessons Learned Review Board (link: [Lessons Learned](#)) has a website for submitting and searching lessons learned.

21. References

1. BP Practice 4.4-0001, Reporting of Incidents (1 March 2017) (link: [Reporting of Incidents](#))
2. RCD 4.4-0001, Group HSE Definitions (26 February 2016) (link: [Group HSE Definitions](#))
3. FIN-GDP 4.4-0001-01, HSSE & Operational Data Reporting Requirements for BP Group (1 July 2010) (Finance Supplement to the GDP 4.4-001 Reporting HSSE and Operational Incidents) (link: [HSSE and Operational Data Reporting Requirements](#))
4. BP U.S. Pipeline and Logistics, *Security Manual* (link: [USPL Security Manual](#)).
5. OSHA, U.S. Department of Labor, 29 CFR 1904, “Recording and Reporting Occupational Injuries and Illnesses” (link: [Recording and Reporting Occupational Injuries and Illness](#)).
6. *Operations, Maintenance and Emergency Response* (OMER), Book I procedures (link: [OMER](#)).
7. USPL Emergency Response Planning System (link: [Emergency Response Planning System](#))

Appendix I

Incident Reporting and Documentation Summary

Notes:

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

Incident Type	Verbal Reporting	
	From → (follow normal channels through the organization) → To	Timeline
Injury/Illness	Workforce → Operations Team Leader	As soon as practical
	Ops TL → Health Services Advisor (for employees only)	< 1 hour
	<ul style="list-style-type: none"> • First aid only: Ops TL → DOM, (and EPIC Mgr if contractor) 	< 1 shift
	<ul style="list-style-type: none"> • Recordable injuries: Ops TL → DOM, (and EPIC Mgr if contractor) → Head of Ops & HSSE → Entity Leader (to contact injured worker) 	< 1 hour
	<ul style="list-style-type: none"> • DAFW and fatality: Ops TL → DOM, (and EPIC Mgr if contractor) → Head of Ops & HSSE → Entity Leader (to contact injured worker) 	As soon as practical
	Ops TL → Safety Coordinator → HSSE Manager → Head of Ops & HSSE	Same timeline as operations notification above
	For fatality, or hospitalizations, amputation or loss of eye to BP employee(s): Ops TL → Safety Coordinator → OSHA	< 8 hours fatality < 24 hours others
	For an incident-related fatality, a life-threatening injury, workplace violence, serious injury to a member of the public, or multiple (three or more) “days away from work” injuries to workforce: Ops TL → C&CM Advisor → BP Notification Center	< 1 hour
	Ops TL → BP Workers’ Compensation Claims administrator (Carol Vajda) (for employees only)	< 1 day
Vehicle Accident	Workforce → Ops TL and local police (if required)	As soon as practical
	For Non-Severe vehicle accidents: Ops TL → Safety Coordinator & Road Safety Advisor → HSSE Manager Ops TL → DOM, (and EPIC Supervisor if contractor)	< 1 shift
	For Severe vehicle accidents only: Ops TL → Safety Coordinator & Road Safety Advisor → HSSE Manager → Head of Operations & HSSE Ops TL → DOM, and (EPIC Mgr if contractor) → Head of Ops & HSSE,	< 2 hours
	Ops TL → Environmental Coordinator → National Response Center (if involving hazmat)	< 12 hours
	Ops TL → Road Safety Advisor (if involving a commercial motor vehicle)	< 1 day

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Next Review Date: December 12, 2022

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

Incident Type	Verbal Reporting	
	From → (follow normal channels through the organization) → To	Timeline
	Ops TL → USPL vendor – Wheels (USPL vehicles only)	< 1 day
Loss of Primary Containment— DOT jurisdictional equipment	Workforce → Ops TL	As soon as practical
	Ops TL → DOM, (and EPIC Supervisor if contractor)	< 1 hour
	Ops TL → Environmental Coordinator → HSSE Mgr and DOT Compliance Advisor → Compliance Manager	< 1 hour
	Environmental Coordinator → National Response Center (Refer to local Facility Response Plan and OMER manual)	< 1 hour
	Ops TL → C&CM Advisor → BP Notification Center (see criteria in Appendix II)	< 1 hour
	DOT Compliance Advisor → National Response Center (update)	< 48 hours
Loss of Primary Containment— Non DOT jurisdictional equipment	Workforce → Ops TL	As soon as practical
	Ops TL → DOM, (and EPIC Supervisor if contractor)	< 1 hour
	Ops TL → Environmental Coordinator → HSSE Mgr	< 1 hour
	Ops TL → Environmental Coordinator → National Response Center and local agency, if required (Refer to local Facility Response Plan)	As soon as practical
	Ops TL → C&CM Advisor → BP Notification Center (see criteria in Appendix II)	< 1 hour
Environmental permit exceedance	Ops TL → Environmental Coordinator → HSSE Mgr or Environmental Coordinator → Ops TL of asset and HSSE Mgr	< 24 hours
	Employee → Ops TL	As soon as practical
Regulatory Agency Visit and Actions	Ops TL → DOM (required for actions but at own discretion for visits)	< 8 hours
	Employee (or Ops TL) → HSSE Coordinator → HSSE Mgr, and Legal (if action is likely against BP)	As soon as practical
	Workforce → Ops TL	As soon as practical
Security Incidents	Employee → Local police	As soon as practical
	Ops TL → USPL Security Authority → Group Security	As soon as practical
	USPL Security Authority → National Response Center (for Transportation Security Incidents (TSI), breaches of security and suspicious activity that may lead to a TSI.)	As soon as practical
	USPL Security Authority → local Coast Guard (as a courtesy call after notifying the NRC)	< 1 hour
	Ops TL → C&CM Advisor → BP Notification Center (immediate security threat)	< 1 hour
	Ops TL → DOM, (and EPIC Supervisor if contractor)	< 4 hours
	DOM, (or EPIC Supervisor if contractor) (at own discretion) → Head of Ops & HSSE (at own discretion) → Entity Leader	< 8 hours
	Ops TL → Quality and Technical Service	As soon as practical
Quality Incidents	Ops TL → DOM, (and EPIC Supervisor if contractor)	As soon as practical
	Ops TL → Control Center (if applicable)	As soon as practical
	Ops TL → C&CM Advisor → BP Notification Center (see criteria in	< 1 hour

Incident Type	Verbal Reporting	
	From → (follow normal channels through the organization) → To	Timeline
	Appendix II)	
Near Misses/ Good Catches and Stop Work Interventions	Workforce → Ops TL or Supervisor (evaluate learning potential to determine if further investigation would be beneficial)	< 8 hours
Items listed above could also be Major incidents or High Potential incidents. If so, the requirements below also apply. If not, the requirements are as summarized above.		
Major Incidents (actual severity A- D and E unless noted)	Ops TL, EPIC Supervisor (if contractor) → Entity Leader	As soon as practical
	Entity Leader → US FVC SPUL, US FVC COO, Head of S&OR Downstream, BP legal	< 8 hours
	For <i>potential</i> severity A-D and E: Entity Leader → US FVC SPUL, US FVC COO, Head of S&OR Downstream	< 24 hours
	Ops TL → C&CM Advisor → BP Notification Center	<1 hour
	Entity Leader → President, BP America and Chief Executive Downstream	Prior to MIA
	If marine operations related: Ops TL → USPL Head of Ops & HSSE → Marine Authority Downstream → Group Marine Authority	< 24 hours

Incident Type	Written Reporting	
	Recipient or System	Timeline
Injury/Illness	Entity communication for OSHA recordable injuries	< 48 hours
	IRIS	< 3 days
	OSHA Log and OSHA Report (employees only)	< 7 calendar days
Vehicle Accident	ESIS	1 day
	IRIS	< 3 days
	DOT Form 5800.1 (Commercial motor vehicles only)	< 30 days
	DOT Accident Register (Commercial motor vehicles only)	< 30 days
Loss of Primary Containment— DOT jurisdictional equipment	IRIS	< 3 days
	DOT Form 7000.1 (oil)	< 30 days
	DOT Form 7100.1 (gas)	< 30 days
	API PPTS Form by DOT Programs Advisor	Quarterly
	Form F-195.402(c)(5) by Response Manager	< 4 weeks
	Local and State Agency requirements (Refer to local Facility Response Plan)	< 4 weeks
Loss of Primary Containment— Non-DOT jurisdictional equipment	IRIS	< 3 days
	API PPTS form by DOT Specialist (spills ≥ 5 gal)	Quarterly
	Local and State Agency requirements (Refer to local Facility Response Plan)	< 4 weeks
Regulatory Agency Visit and Actions	IRIS	< 3 days
	SharePoint (Notices/ violations/ citations only)	< 3 days
	Email to HSSE Manager and DOT Programs Advisor.	< 3 days
	For Compliance Notices only – Compliance Notice to USPL summary (as requested in paragraph 11.2.E)	< 10 days

Incident Type	Written Reporting	
	Recipient or System	Timeline
Security Incidents	Security Loss, Offense, and Incident Report Form (If incident was called into the NRC this report must be handled as Security Sensitive Information per the USPL Security Manual and the MTSA Facility Security Plan)	< 1 day
	IRIS	< 3 days
Near Misses and Stop Work Interventions	IRIS as Incident without consequence.	< 3 days
Items listed above could also be Major incidents or High Potential incidents. If so, the requirements below also apply. If not, the requirements are as listed above.		
Major Incidents	*Email MIA form to G Downstream Incident Notification (after GVP approval); G PL Extended Leadership; Head of S&OR Downstream, US FVC SPUL, US FVC COO, COO executive assistant, VP of S&OR Downstream.	< 24 hours
	<ul style="list-style-type: none"> Severity A–D & E (actual or potential) 	< 24 hours
	IRIS	< 3 days
	*Note: If this was a Major security incident <i>not</i> in the public domain, communicate securely with the Head of S&OR Downstream, US FVC SPUL, US FVC COO and COO executive assistant, VP of S&OR Downstream, and Regional Security Advisor.	< 24 hours

Appendix II

BP Notification Center Call Requirements

In the event of an incident listed below, please notify the USPL Crisis and Continuity Management Advisor. The USPL Crisis and Continuity Management Advisor is responsible for the notifications below.

Revised January 2017

Type of Incident	Telephone the Notification Center within 1 hour if the incident meets the following criteria:
Injury or fatality to BP personnel, contractors, or the public	<ul style="list-style-type: none"> • An incident-related fatality; <u>or</u> • A life-threatening injury; <u>or</u> • Workplace violence; <u>or</u> • Serious injury to a member of the public; <u>or</u> • Multiple (three or more) “days away from work” injuries to BP employees or contractors.
Release of crude, petroleum product, chemical, or hazardous substance to the air, water, land, or subsurface in excess of government limitations (permit or other) or reportable to a government agency	<ul style="list-style-type: none"> • There are impacts to the surrounding community, including evacuation or a serious threat to public health or safety; <u>or</u> • There is the potential for significant environmental impact; <u>or</u> • A coordinated cleanup effort will be required with agencies and outside services; <u>or</u> • Significant adverse media coverage is probable or existing; <u>or</u> • In accordance with OMER or FRP.
Explosion and or fire	<ul style="list-style-type: none"> • There is off-site or significant on-site impact.
Serious threats to security	<ul style="list-style-type: none"> • The threat is immediate (such as ongoing demonstrations or a bomb or kidnapping threat).
Potential product recall	<ul style="list-style-type: none"> • There is a serious health risk; <u>or</u> • Deliberate product tampering is involved.
Incidents not specifically listed above	<ul style="list-style-type: none"> • The facility management believes the incident could have a significant impact or could cause significant adverse attention to BP (i.e., adverse reaction from authorities, media, NGOs, or the general public).
Major Incident Announcement (MIA)	<ul style="list-style-type: none"> • The incident meets the criteria of a Major Incident Announcement.
Rail Incident	<ul style="list-style-type: none"> • North America Rail has requested notification for all incidents.

BP Notification Center

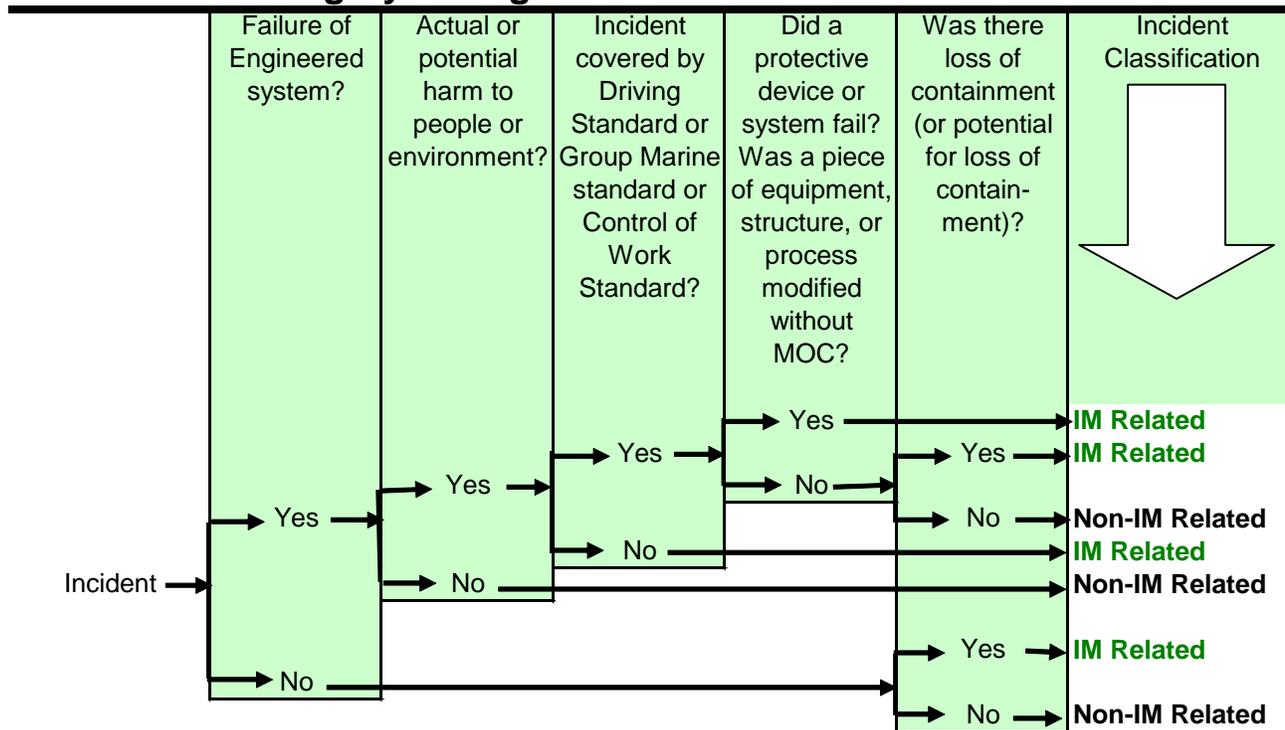
800-321-8642

Appendix III Integrity Management Incident Decision Tree

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

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

Integrity Management Incident Decision Tree



Appendix IV

HSE Severity Levels

SEVERITY	HEALTH AND SAFETY	ENVIRONMENTAL
A Levels A-C maintain the visibility of risks with the potential for catastrophic impact even if their probability of occurrence is extremely low. The upper level of this framework is defined by the most severe level of impact ever seen in industry.	Comparable to the most catastrophic health/ safety incidents ever seen in industry. <ul style="list-style-type: none"> The potential for 100 or more fatalities (or onset of life threatening health effects) shall always be classified at this level. 	<ul style="list-style-type: none"> Future impact, e.g., unintended release, with widespread damage to any environment and which remains in an "unsatisfactory" state for a period > 5 years. Future impact with extensive damage to a sensitive environment and which remains in an "unsatisfactory" state for a period > 5 years. Future impact with widespread damage to a sensitive environment and which can only be restored to a "satisfactory" / agreed state in a period of more than 1 and up to 5 years.
	Catastrophic health/ safety incident causing very widespread fatalities within or outside a facility. <ul style="list-style-type: none"> The potential for 50 or more fatalities (or onset of life threatening health effects) shall always be classified at this level. 	<ul style="list-style-type: none"> Future impact with extensive damage to a non-sensitive environment and which remains in an "unsatisfactory" state for a period > 5 years. Future impact with extensive damage to a sensitive environment and which can only be restored to a "satisfactory" / agreed state in a period of more than 1 and up to 5 years. Future impact with widespread damage to a non-sensitive environment and which can only be restored to a "satisfactory" / agreed state in a period of more than 1 and up to 5 years. Future impact with widespread damage to a sensitive environment and which can be restored to an equivalent capability in a period of around 1 year.
	Catastrophic health/ safety incident causing widespread fatalities within or outside a facility. <ul style="list-style-type: none"> The potential for 10 or more fatalities (or onset of life threatening health effects) shall always be classified at this level. 	<ul style="list-style-type: none"> Future impact with extensive damage to a non-sensitive environment and which can only be restored to a "satisfactory" / agreed state in a period of more than 1 and up to 5 years. Future impact with widespread damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of around 1 year. Future impact with extensive damage to a sensitive environment and which can be restored to an equivalent capability in a period of around 1 year. Future impact with widespread damage to a sensitive environment and which can be restored to an equivalent capability in a period of months.
D	Very major health/ safety incident <ul style="list-style-type: none"> The potential for 3 or more fatalities (or onset of life threatening health effects) shall always be classified at this level. 30 or more injuries or health effects to BP workforce, either permanent or requiring hospital treatment for more than 24 hours. 	<ul style="list-style-type: none"> Future impact with extensive damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of around 1 year. Future impact with localized damage to a sensitive environment and which can be restored to an equivalent capability in a period of around 1 year. Future impact with widespread damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of months. Future impact with extensive damage to a sensitive environment and which can be restored to an equivalent capability in a period of months.
E	Major health/ safety incident <ul style="list-style-type: none"> 1 or 2 fatalities, acute or chronic, actual or alleged. 10 or more injuries or health effects to BP workforce, either permanent or requiring hospital treatment for more than 24 hours. 	<ul style="list-style-type: none"> Future impact with localized damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of around 1 year. Future impact with extensive damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of months. Future impact with localized damage to a sensitive environment and which can be restored to an equivalent capability in a period of months. Future impact with extensive damage to a sensitive environment and which can be restored to an equivalent capability in a period of days or weeks.
F	High impact health/ safety incident <ul style="list-style-type: none"> Permanent partial disability(ies) Several non-permanent injuries or health impacts. DAFWC 	<ul style="list-style-type: none"> Future impact with localized damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of months. Future impact with immediate area damage to a sensitive environment and which can be restored to an equivalent capability in a period of months. Future impact with extensive damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of days or weeks. Future impact with localized damage to a sensitive environment and which can be restored to an equivalent capability in a period of days or weeks.

G	<p>Medium impact health/ safety incident</p> <ul style="list-style-type: none"> • Single or multiple recordable injury or health effects from common source/event. 	<ul style="list-style-type: none"> • Future impact with immediate area damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of months. • Future impact with localized damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of days or weeks. • Future impact with immediate area damage to a sensitive environment and which can be restored to an equivalent capability in a period of days or weeks.
H	<p>Low impact health/ safety incident</p> <ul style="list-style-type: none"> • First aid • Single or multiple over-exposures causing noticeable irritation but no actual health effects 	<ul style="list-style-type: none"> • Future impact with immediate area damage to a non-sensitive environment and which can be restored to an equivalent capability in a period of days or weeks.

BP's commitment to health, safety and the environment is paramount; this is reflected in BP's HSE goal of "No Accidents, No Harm to People, and No Damage to the Environment". No accident, injury, or loss of containment causing damage to the environment is ever "acceptable" to BP. BP is using this framework (equivalents of which are used throughout industry) to support the consistent prioritization of actions to eliminate or mitigate HSE risk and as part of BP's Performance Improvement Cycle to deliver continuous risk reduction.

Business Impact Levels

SEVERITY *	Non-Financial Impact	Financial Impact (EQUIPMENT DAMAGE, BUSINESS VALUE LOST)
A	<ul style="list-style-type: none"> • Public or investor outrage on a global scale • Threat of global loss of license to operate 	>\$20 billion
B	<ul style="list-style-type: none"> • Loss of license to operate a major asset in a major market – US, EU, Russia. • Intervention from major Government – US, UK, EU, Russia. • Public or investor outrage in major western markets – US, EU. • Damage to relationships with key stakeholders of benefit to the Group. 	\$5 billion - \$20 billion
C	<ul style="list-style-type: none"> • Loss of license to operate other material asset, or severe enforcement action against a major asset in a major market. • Intervention from other major Government. • Public or investor outrage in other material market where we have presence or aspiration. 	\$1 billion - \$5 billion
D	<ul style="list-style-type: none"> • Severe enforcement action against a material asset in a non-major market, or against other assets in a major market. • Interventions from non-major Governments. • Public or investor outrage in a non-major market, or localized or limited "interest-group" outrage in a major market • Prolonged adverse national or international media attention. • Widespread adverse social impact • Damage to relationships with key stakeholders of benefit to the Segment. 	\$100 m to \$1 billion
E	<ul style="list-style-type: none"> • Other adverse enforcement action by regulators. • Limited "interest-group" outrage in non major market • Short term adverse national or international media coverage. • Damage to relationships with key stakeholders of benefit to the SPU. 	\$5m - \$100 m
F	<ul style="list-style-type: none"> • Regulatory compliance issue which does not lead to regulatory or other higher severity level consequence • Prolonged local media coverage. • Local adverse social impact • Damage to relationships with key stakeholders of benefit to the PU. 	\$500k-\$5m

G	<ul style="list-style-type: none">• Short term local media coverage.• Some disruption to local operations (e.g., loss of single road access less than 24 hours)	\$50k - \$500k
H	<ul style="list-style-type: none">• Isolated and short term complaints from neighbors (e.g., complaints about specific noise episode).	<\$50k

Appendix V

Loss of Primary Containment Severity Classification

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

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

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

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

Note: Official recordkeeping determination is based on kilograms (kg) of material. Barrels are listed in the chart below as estimates only.

Loss of primary containment severity classification					
Type of substance	Flammable gases and vapours		Flammable liquids ¹		Other hazardous categories including combustible or corrosive gases/ fluids/vapours or solids
	Onshore confined releases Offshore releases – manned facilities	Onshore, unconfined releases Offshore releases – unmanned facilities	Offshore – loss of primary containment	Onshore – loss of primary containment	Onshore/offshore – loss of primary containment. Oil spills related to marine activity.
Level A-D	> 5000 kg	> 50000 kg	> 10000 kg	> 100,000 kg	>1000 bbl (fluids) >200,000 kg (gas/vapours/solids)
Level E	500 < 5000 kg	5000 < 50000 kg	1000 < 10000 kg	10000 < 100,000 kg	100 <1000 bbl (fluids) 20,000 <200,000 kg (gas/vapours/solids)
Level F	50 < 500 kg	500 < 5000 kg	100<1000 kg	1000 < 10000 kg	10 <100 bbl (fluids) 2000 <20,000 kg (gas/vapours/solids)
Level G	5 < 50 kg	50 < 500 kg	10 < 100 kg	100 < 1000 kg	1 < 10 bbl (fluids) 200 < 2000 kg (gas/vapours/solids)
Level H	< 5 kg	< 50 kg	< 10 kg	< 100 kg	< 1 bbl (fluids) < 200 kg (gas/vapours/solids)

Loss of primary containment severity classification			
Type of substance	Flammable gases and vapours	Flammable liquids ¹	Other hazardous categories including combustible or corrosive gases/ fluids/vapours or solids
Definitions ²	<p><i>Definition of flammable gas: Gaseous material, at ambient temperature/pressure, that forms a flammable mixture where the Lower Flammable Limit is <13%, or the range between the Lower and Upper Flammability Limit is >12%. Liquids with boiling point ≤35 °C and flash point <23°C or</i></p> <p><i>Other Packing Group I Materials excluding strong acids/bases.</i></p>	<p><i>Definition of flammable liquid: Liquids with boiling point >35 °C and flash point <23 °C</i></p> <p><i>Other Packing Group II Materials excluding moderate acids/bases.</i></p> <p><i>Strong acids/bases.</i></p>	<p><i>Definition of other hazardous materials: Packing Group III materials, a comprehensive list of substances is available under the categorization as defined by United Nations (UN) Dangerous Goods definitions (e.g., corrosives including acid or base, organic peroxides, pyrophoric materials). Liquids with a flash point ≥23°C</i></p> <p><i>Moderate acids/bases. (Note: IRIS will request whether the liquid has a flashpoint >60°C and was it released at or above its flash point.)</i></p>

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

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

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

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

Commodity	Specific Gravity	Conversion Factor
Gasoline	0.74	0.357
Diesel	0.88	0.300
Jet Fuel	0.82	0.322
Crude Oil or Transmix	0.83	0.318
Xylene	0.87	0.304
Ethanol	0.79	0.334

Appendix VI

Commercial Motor Vehicle Accident Reporting

- A. The Supervisor shall notify the National Response Center (800-424-8802) as soon as practical but within 12 hours if any of the following occurs involving a BP driver during loading, transportation, unloading, or temporary storage in which as a direct result of hazardous materials:
1. A person is killed;
 2. A person receives an injury requiring admittance to a hospital;
 3. The general public is evacuated for one hour or more;
 4. A major transportation artery or facility is closed or shut down for one hour or more;
 5. The operational flight pattern or routine of an aircraft is altered; or
 6. A situation exists of such a nature (e.g., a continuing danger to life exists at the scene of the incident) that, in the judgment of the carrier, it should be reported to NRC even though it does not meet the criteria listed above.
- B. The Supervisor shall submit DOT Form 5800.1, "Hazardous Materials Incident Report," whenever any of the following occurs involving a BP driver during loading, transportation, unloading, or temporary storage:
1. Any incident requiring National Response Center notification, as listed above.
 2. An unintentional release of a hazardous material. (See paragraph E below for exceptions.)
 3. The following types of damage to a specification cargo tank with a capacity of 1,000 gallons or greater containing any hazardous material:
 - a) Structural damage to the lading (cargo tank and piping) retention system; or
 - b) Damage that requires repair to a system intended to protect the lading retention system, even if there is no release of hazardous material.
- C. DOT Form 5800.1 shall be submitted within 30 days to the Information Systems Manager, DHM-63, Research and Special Programs Administration, Department of Transportation, Washington, D.C. 20590-0001. (The report can also be completed and submitted online via the following link: [Hazardous Materials Incident Report](#).)
- Note:* When a DOT-related incident (as defined in paragraphs A or B above) involves a non-BP driver (e.g., exclusive-use carrier, call-and-demand carrier, jobber, etc.), the notification and reporting requirements are the responsibility of the carrier and not BP.
- D. DOT Form F 5800.1 shall be updated within one year of the date of the occurrence of the incident whenever
1. A death results from an injury caused by a hazardous material;
 2. There was a misidentification of the hazardous material or packaging information on a prior incident report;
 3. Damage, loss, or related cost that was not known when the initial incident report was filed becomes known; or
 4. Damage, loss, or related cost changes by \$25,000 or more or 10% of the prior total estimate, whichever is greater.
- E. Unless a telephone report is required, the DOT Form 5800.1 requirements do not apply to a release of a minimal amount of material from the following:
1. A vent for material for which venting is authorized;

2. The routine operations of a seal, pump, compressor, or valve; or
3. Connection or disconnection of loading or unloading lines if the release does not result in property damage.

Appendix VII

Vehicle Accident Severities

Table 1 - Severe Vehicle Accidents

Severe Vehicle Accident – A work-related vehicle accident that is recorded in BP’s reporting tool (IRIS) with an actual severity level of A to G inclusive. The very minor severity level H accidents are excluded from this measure.

If any of the following occurs, the accident must have a severity level of at least G:

Actual severity level	Scenario’s A vehicle accident that involves any of the following:	Potential severity level
A-D	<ul style="list-style-type: none"> BP Workforce fatalities* Third party fatalities* <p><i>This relates to 3 or more fatalities, or 30 or more injuries or health effects (Refer to BP Policy 000030 Risk Management)</i></p>	At least A-D
E	<ul style="list-style-type: none"> BP Workforce fatality* Third party fatality* <p><i>This relates to 1 or 2 fatalities, or 10 or more injuries or health effects (Refer to BP Policy 000030 Risk Management)</i></p>	At least E
F	<ul style="list-style-type: none"> BP Workforce DAFWC * BP Workforce motor vehicle rollover 	At least F
G	<ul style="list-style-type: none"> BP Workforce recordable injury * 	At least G

* Associated with the vehicle accident

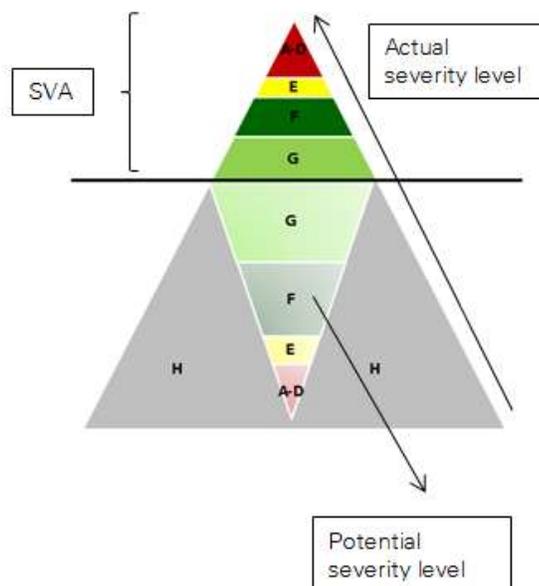


Table 2 - All Other Vehicle Accidents

Vehicle Accident that does not meet the definition of SVA – A <u>vehicle accident</u> that is recorded in BP's reporting tool (IRIS) with an actual severity level of H.		
Actual severity level	Examples and/or conditions	Potential severity level
H	<ul style="list-style-type: none"> Vehicle accident involving a vehicle carrying more than 10 people Vehicle losing a trailer (decoupling while driving) Collision with 3rd party pedestrian, bicycle or motorcyclist where 3rd party is taken to the hospital High-speed collision or a collision between two vehicles involving a high-speed differential (e.g. speed >50 mph or 80 km/hr) Vehicle striking process equipment/pipeline Collision with "high potential" for fatality (for example object causing severe damage to windshield) 	At least E
H	<ul style="list-style-type: none"> Higher-speed collision or collision between two vehicles involving a higher-speed differential (e.g. speed 31-49 mph or 51-79 km/hr) Vehicle airbag system being deployed Vehicle mechanical failure (e.g. brake failure, power steering failure, tire blow out, losing a wheel, engine fire) Side-impact collision Vehicle accident involving a vehicle carrying more than 3 people Indication/potential of driver fatigue (e.g. driver fell asleep) Indication/potential of driver became unwell 	At least F
H	<ul style="list-style-type: none"> Speed collision or a collision between two vehicles involving a speed differential (e.g. speed 21-30 mph or 31-50 km/hr) ("Medium" speed) Indication/potential of driver distractions Injuries requiring first aid only Disabling damage of any of the vehicle involved requiring any unit to be towed from the scene. (previously SVA criteria) Any off-site spill greater than one barrel (1bbl) of product, while in transit (previously SVA criteria) 	At least G
H	<ul style="list-style-type: none"> Low-speed collision or a collision between two vehicles involving a low-speed differential (e.g. speed <20 mph or 30 km/hr) Minor vehicle damage, e.g. no disabling damage 	H
Notes: <ul style="list-style-type: none"> A vehicle accident can only be recorded with an actual severity level of H if it does not meet the criteria for a Severe Vehicle Accident (SVA). A vehicle accident recorded with a potential severity level of E or A-D is to be reported and recorded as a HiPo. A vehicle accident resulting in a spill/LOPC, where the spill meets the LOPC severity or Environmental severity matrix should be recorded as an LOPC accordingly. 		

Appendix VIII

API Tier 1 and 2 Tables

Table 1—Tier 1 Material Release Threshold Quantities

Threshold Release Category	Material Hazard Classification ^{a,c,d,e,f}	Threshold Quantity (outdoor release)	Threshold Quantity (indoor ^b release)
T1-1	TIH Zone A Materials	≥5 kg (11 lb)	≥0.5 kg (1.1 lb)
T1-2	TIH Zone B Materials	≥25 kg (55 lb)	≥2.5 kg (5.5 lb)
T1-3	TIH Zone C Materials	≥100 kg (220 lb)	≥10 kg (22 lb)
T1-4	TIH Zone D Materials	≥200 kg (440 lb)	≥20 kg (44 lb)
T1-5	Flammable Gases or Liquids with Normal Boiling Point ≤35 °C (95 °F) and Flash Point <23 °C (73 °F) or Other Packing Group I Materials (excluding acids/bases)	≥500 kg (1100 lb)	≥50 kg (110 lb)
T1-6	Liquids with Normal Boiling Point >35 °C (95 °F) and Flash Point <23 °C (73 °F) or Other Packing Group II Materials (excluding acids/bases)	≥1000 kg (2200 lb) or ≥7 bbl	≥100 kg (220 lb) or ≥0.7 bbl
T1-7	Liquids with Flash Point ≥23 °C (73 °F) and ≤60 °C (140 °F) or Liquids with Flash Point >60 °C (140 °F) released at a temperature at or above Flash Point or Strong acids/bases (see definition 3.1.2) or UNDG Class 2, Division 2.2 (non-flammable, non-toxic gases) excluding air or Other Packing Group III Materials	≥2000 kg (4400 lb) or ≥14 bbl	≥200 kg (440 lb) or ≥1.4 bbl

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

In determining the Threshold Release Category for a material, one should first use the toxic (TIH Zone) or flammability (Flash Point and Boiling Point) or corrosiveness (Strong Acid or Base vs. Moderate Acid or Base) characteristics. Only when the hazard of the material is not expressed by those simple characteristics (e.g. reacts violently with water) is the UN/ADR Packing Group used.

^a Many materials exhibit more than one hazard. [22] Correct placement in Hazard Zone or Packing Group shall follow the rules of DOT 49 CFR 173.2a [22] or UN Recommendations on the Transportation of Dangerous Goods, Section 2. [18] See Annex F.

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

^c For solutions not listed on the UN/ADR, the anhydrous component shall determine the TIH zone or Packing Group classification. The threshold quantity of the solution shall be back calculated based on the threshold quantity of the dry component weight.

^d For mixtures where the UN/ADR classification is unknown, the fraction of threshold quantity release for each component may be calculated. If the sum of the fractions is equal to or greater than 100 %, the mixture exceeds the threshold quantity. Where there are clear and independent toxic and flammable consequences associated with the mixture, the toxic and flammable hazards are calculated independently. See Annex E, PSE Examples and Questions 49 through 53.

^e A LOPC of Liquids with Flash Point >60 °C (140 °F) and ≤93 °C (200 °F) released at a temperature below Flash Point cannot be Tier 1 PSE based upon quantity released no matter the volume.

^f A LOPC of a moderate acid/base cannot be Tier 1 PSE based upon quantity released no matter the volume.

Table 2—Tier 2 Material Release Threshold Quantities

Threshold Release Category	Material Hazard Classification ^{a,c,d,e,f}	Threshold Quantity (outdoor release)	Threshold Quantity (indoor ^b release)
T2-1	TIH Zone A Materials	≥0.5 kg (1.1 lb)	≥0.25 kg (0.55 lb)
T2-2	TIH Zone B Materials	≥2.5 kg (5.5 lb)	≥1.25 kg (2.75 lb)
T2-3	TIH Zone C Materials	≥10 kg (22 lb)	≥5 kg (11 lb)
T2-4	TIH Zone D Materials	≥20 kg (44 lb)	≥10 kg (22 lb)
T2-5	Flammable Gases or Liquids with Normal Boiling Point ≤35 °C (95 °F) and Flash Point <23 °C (73 °F) or Other Packing Group I Materials (excluding acids/bases)	≥50 kg (110 lb)	≥25 kg (55 lb)
T2-6	Liquids with Normal Boiling Point >35 °C (95 °F) and Flash Point <23 °C (73 °F) or Other Packing Group II Materials (excluding acids/bases)	≥100 kg (220 lb) or ≥0.7 bbl	≥50 kg (110 lb) or ≥0.35 bbl
T2-7	Liquids with Flash Point ≥23 °C (73 °F) and ≤60 °C (140 °F) or Liquids with Flash Point >60 °C (140 °F) released at a temperature at or above Flash Point or Strong acids/bases (see definition 3.1.2) or UNDG Class 2, Division 2.2 (non-flammable, non-toxic gases) excluding air or Other Packing Group III Materials	≥200 kg (440 lb) or ≥1.4 bbl	≥100 kg (220 lb) or ≥0.7 bbl
T2-8	Liquids with Flash Point >60 °C (140 °F) and ≤93 °C (200 °F) released at a temperature below Flash Point or Moderate acids/bases (see definition 3.1.1)	≥1000 kg (2200 lb) or ≥7 bbl	≥500 kg (1100 lb) or ≥3.5 bbl

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

In determining the Threshold Release Category for a material, one should first use the toxic (TIH Zone) or flammability (Flash Point and Boiling Point) or corrosiveness (Strong Acid or Base vs. Moderate Acid or Base) characteristics. Only when the hazard of the material is not expressed by those simple characteristics (e.g. reacts violently with water) is the UNGL Packing Group used.

^a Many materials exhibit more than one hazard. Correct placement in Hazard Zone or Packing Group shall follow the rules of DOT 49 CFR 173.2a [22] or UN Recommendations on the Transportation of Dangerous Goods, Section 2 [18]. See Annex F.

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

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

^d For mixtures where the UNDG classification is unknown, the fraction of threshold quantity release for each component may be calculated. If the sum of the fractions is equal to or greater than 100 %, the mixture exceeds the threshold quantity. Where there are clear and independent toxic and flammable consequences associated with the mixture, the toxic and flammable hazards are calculated independently. See Annex E, PSE Examples and Questions 49 through 53.

^e A LOPC of Liquids with Flash Point >60 °C (140 °F) and ≤93 °C (200 °F) released at a temperature below Flash Point cannot be Tier 1 PSE based upon quantity released no matter the volume.

^f A LOPC of a moderate acid/base cannot be Tier 1 PSE based upon quantity released no matter the volume.