Foreword

Refinery employees in our company have achieved some of the best safety and environmental accomplishments in the oil industry. Such performance, like accidents, did not “just happen” - it was caused. Injuries or chemical releases are caused by UNSAFE ACTS or UNSAFE CONDITIONS. Our experience and analysis has taught us that certain safe methods prevent accidents. The purpose of this booklet is to list the methods or general rules which have been found important in our operations. These rules cannot be expected to cover each phase of every operation. Therefore it is important that you talk to your supervisor about any questions you may have on specific rules or procedures for the work you will be performing. Rules and procedures by themselves cannot prevent accidents; every employee has to follow them to achieve the benefit.
BP’s COMMITMENT TO HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE

Everybody who works for BP, anywhere, is responsible for getting HSE right. Good HSE performance is critical to the success of our business.

Our goals are simply stated - no accidents, no harm to people, and no damage to the environment.

We will continue to drive down the environmental and health impact of our operations by reducing waste, emissions and discharges, and using energy efficiently. We will produce quality products that can be used safely by our customers.

Wherever we have control or influence we will:

• consult, listen and respond openly to our customers, neighbors, and public interest groups
• work with others - our partners, suppliers, competitors and regulators - to raise the standards of our industry
• openly report our performance, good and bad
• recognize those who contribute to improved HSE performance

Our business plans include measurable HSE targets. We are all committed to meeting them.
BP Toledo Refinery is committed to our Corporate goal of no damage to the environment. We will continue to drive down the environmental impact of our operations by preventing pollution, reducing waste, emissions and discharges, and using energy efficiently.

We will:

- Consult, listen and respond openly to our customers, employees, neighbors, public interest groups and those who work with us.
- Work with others - our partners, suppliers, competitors and regulators - to raise the standards of our industry.
- As a minimum, comply with all applicable laws and regulations and any other requirements to which the company subscribes.
- Openly report our performance, good and bad.

Our Business Plans include measurable Environmental targets and we are committed to meeting them.

Effective January, 2004
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PURPOSE OF THIS BOOK

No Job Is More Urgent Than The Necessity To Perform It Safely!

The purpose of this book is to provide to each work force employee a code for safe and environmentally responsible work practices for use through out the refinery.

This booklet is presented with the understanding that it is impossible to cover all potential unsafe acts and unsafe conditions. Nothing can take the place of constant vigilance and care. Always consider the consequences of your actions.

For detailed instructions on certain procedures, talk with your supervisor who will be able to obtain copies of all policies and procedures for the refinery.

EMPLOYEES RESPONSIBILITIES

Responsibilities In Promoting Health, Safety and Environmentally Sound Practices.

It is the duty of each employee to execute his or her individual work assignments in accordance with recognized refinery policies, rules and procedures. If there is any doubt regarding proper methods of executing work, consult with your supervisor for specific instructions. It is the duty of employees to adhere to their supervisor’s suggestions for the promotion of HSE practices.

Employee’s must exercise constant vigilance and help to prevent accidents by:

a) Staying alert to observe and watch for unsafe acts and conditions. It is your obligation to report unsafe acts and conditions immediately.
b) Studying and applying written and verbal instructions.
c) Understanding and carefully following instructions.
d) Using best judgement and giving undivided attention to the work at hand.
e) Helping other employees to better understand HSE practices.
f) Participating on Health, Safety and Environment committees.
g) Stopping work if you feel it is unsafe
The purpose of these rules is to insure the safety and welfare of our employees in the maintenance of orderly operations. Because of the serious nature of any violation of these rules, you may be suspended or discharged for the following:

1. Carelessness regarding safety of another person or yourself.
2. Disregard for established safety rules and safe working practices.
3. Failure to report to your immediate supervisor, without delay, accidents or personal injury while on duty.
4. Excessive absences or tardiness.
5. Absence from your job without notice to and permission from your supervisor.
6. Giving false testimony or refusing to give testimony in the course of investigations on accidents or actions of any other employees which might justify disciplinary actions.
7. Giving false information of either verbal or written nature concerning yourself or other job applicants prior to, at the time of, or subsequent to employment.
8. Gross neglect of duty, willful destruction or neglect of company property.
9. Failure to follow operating instructions or accepted work practices after having been expressly warned by a supervisor.
10. Smoking outside of a designated Smoking area in the refinery.
11. Dishonesty in the conduct of your job.
12. Knowingly violating any company, local, state or federal law when on company property or while on company business, such as
   A. Carrying a concealed weapon or transporting of firearms or weapons of any kind into the plant.
B. Willfully attempting or causing bodily injury to another person.
C. Conduct violating common decency or morality.
D. Stealing or malicious mischief resulting in destruction or loss of property of another person or of the company.
13. Insubordination including refusal or failure to perform assigned work.
14. Harassment, or using threatening or abusive language or actions toward another person.
15. Obtaining material at company warehouse or other company installation under fraudulent orders.
16. Sleeping while on duty.
17. Offering or receiving money or other valuable consideration in order to obtain a better job, working place or change in working conditions.
18. Using or under the influence of intoxicating liquors or consumption or possession of narcotics and/or illicit drugs or alcohol on company premises or while operating a company vehicle.
19. Reporting for work in a condition unfit for duty.
20. Taking unfair advantage of the company’s benefit plans.
21. Operating any vehicle on company property in a reckless manner or in violation of plant safety rules.
22. Performing personal business on company time without prior supervisory approval.
23. Theft of company property.

These rules are not intended to be all inclusive of the required proper standards of conduct or obligation of employees. The company will change these rules or establish additional ones as necessary.
TOLEDO REFINERY POLICY 
ON HARASSMENT IN THE WORKPLACE

Policy
No employee, contractor, vendor or customer shall be subjected to harassment on the basis of race, color, creed, religion, national origin, handicap, veteran status, age or sex. Additionally a work environment that respects the dignity of the individual will be maintained. Employee conduct, whether intentional or unintentional, that results in employee harassment shall not be condoned and may result in disciplinary action.

Provisions
A. The Company prohibits harassment in the workplace on the basis of race, color, creed, religion, national origin, handicap, veteran status, age or sex. Harassment includes any conduct that has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive work environment. Inappropriate jokes, slurs, tricks, name calling, sexual advances, or comments can constitute harassment and are strictly prohibited.

B. Sexual harassment which is prohibited by this policy includes unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature such as commentaries about an individual’s body, sexually degrading descriptions of an individual and the display in the workplace of sexually suggestive objects or pictures when:
   1. submission to such conduct is made a term or condition of any individual’s employment, e.g. relating to performance appraisals, wages, advancement, career or shift assignments;
2. submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual; or

3. such conduct has the purpose or effect of creating an offensive or intimidating work environment.

Procedures

A. The supervisor is responsible for ensuring a work environment that is free of harassment. However, if a harassment complaint is received, the supervisor shall immediately notify the BP Toledo Human Resources Manager (419) 698-6400. The privacy of these complaints is to be assured and the complaining individual is to be kept free of reprisals and retaliation by the Company as a result of such complaints.

B. An employee harassed at work is expected to contact his or her supervisor. However, if the employee who is believed to have committed the harassment is the employee’s supervisor, the employee should contact the Human Resources Manager. Vendors, customers, or contractors who wish to register their concerns should contact the Human Resources Manager.

C. The Human Resources Manager and the appropriate supervisor will conduct an internal investigation promptly and in the strictest confidence. If the investigation determines that harassment has occurred, appropriate disciplinary action up to and including dismissal will be taken.

D. This policy statement shall be posted conspicuously on all bulletin boards.
TOLEDO REFINERY IT SECURITY & USE POLICY

It is BP’s company policy to protect its Information Technology assets and resources from loss, damage, or disruption due to unauthorized access or unauthorized use of equipment or programs.

Company computers, telecommunications equipment, manual and automated systems will be used only in a manner consistent with an employee’s job function and/or for conducting BP business. Any personal software or game software is prohibited.

Contact your supervisor for more information about the Toledo Refinery IT Security & Use Policy.

SECURITY PROGRAM

BP will endeavor to provide a secure work environment and to insure the protection of the property of both the employee and the Company. The level of security maintained will be consistent with the estimated need as indicated by the potential risk.

The responsibility for protecting the workforce and BP’s assets is shared by all employees. If you have a concern or issue regarding Security, call x6451. The Security Department is located in the Security Building at the main gate.

A photographic identification card will be issued to each Company employee as well as an access control key. Each employee will be required to show their ID card and use their access control key to enter or leave the Refinery utilizing the key readers and turnstiles located at the entry/exit gates. The ID card should be displayed at all times while in the refinery. If obtaining an identification card and access control key was not part of your orientation, call Security at x6451 to obtain them.

Lost or stolen ID cards/access control keys should be reported to your immediate supervisor and the Security Department. Security will issue a replacement card or key. The lost/stolen key will be
invalidated in the computer system. If the original ID card or key is found, return it to the Security Department. In accordance with BP Toledo Refinery policy, all vehicles, lunch boxes, and parcels are subject to search prior to entering or leaving the Refinery. Searches are conducted on a random basis 7 days a week, 24 hours a day at all gates and turnstiles.

The threat of terrorism on U.S. soil has changed the face of security at this facility. We ask you to be observant of your surroundings during daily activities and routines; do not hesitate to report suspicious activities or anything out of the ordinary. Suspicious activity may include:

- Unknown persons taking photographs of area facilities
- Unknown persons drawing diagrams of facilities
- Persons loitering around perimeter fence lines
- Suspicious vehicles in or around facility fence lines or parking lots
- Vehicles parked in or around site for long periods of time
- Persons asking questions about facility locations and operations
- Theft of company vehicle passes, ID’s or uniforms
- Theft of sensitive company documents or information
- Suspicious e-mails/phone calls asking for information about sites or facilities
- Suspicious packages or package deliveries
- Suspicious persons out of their normal work area

Please contact BP Security at ext. 6451 if you see anything strange, unusual, or out of the ordinary, inside or near Toledo Refinery.
GENERAL HEALTH, SAFETY AND ENVIRONMENTAL INSTRUCTIONS

These instructions are designed to assist you in choosing a safe and environmentally sound course of action in situations where no specific rule applies and where personal judgement becomes a factor. Heeding the suggestions, hints, and tips contained in these instructions will help to prevent injury to you and your fellow workers or an adverse impact on the environment.

Correct Unsafe Conditions Yourself
…if you see tools, materials etc., on platforms or walkways, remove them to eliminate tripping hazards. Correct any slipping hazards that you can, put oil dry, sand or salt on slippery surfaces. Stop any leaks creating health, safety or environmental hazards and report incidents to your supervisor.

Study Your Job From The Safety Angle
…and think before starting work. Look at the possible consequences of your actions and prevent accidents from happening. Get all necessary protective equipment before you start work. Insure chemicals are properly stored and handled. Consult the MSDS and procedure manual for proper protective clothing or equipment, or consult your supervisor. Be alert for potential hydrocarbon or chemical leaks which may arise.

Mental Distractions Spell Danger
…when the mind is in one place and body in another. If you have a personal situation persistently bothering you, tell your supervisor so he/she can consider this before assigning your job.

Report All Hazards And Near-Misses
…immediately to your supervisor. The Toledo Refinery wants to provide safe and environmentally sound working conditions. You can assist by reporting any unsafe conditions you observe. Near-miss accidents and environmental incidents often reveal such conditions; tell your supervisor about them. Your actions could prevent injury or damage to plant equipment or the environment.

Toledo Refinery
Inspect Tools And Equipment
...before using them. The prevention of serious injury or loss of life may depend on the safe condition of the ladder, rope, tool, or other equipment you are about to use. If you have any doubt about its safeness - DO NOT USE IT - Have the equipment repaired.

Stop Unsafe Work
...you have the right and obligation to stop any work that is unsafe.

Lift Properly
...to avoid serious back injury, bend your legs to get close to the object, keep your back straight, get a firm grasp, and lift by straightening your legs. If the object is too heavy for you, get someone to help you or use lifting equipment.

Understand the Chemical Hazards
...read the Material Safety Data Sheets, also known as MSDSs and chemical labels to understand the chemicals in the refinery. The MSDS’s are available throughout the refinery and are available on the Toledo Internet Web Site. BP Oil wants all employees to stay updated on this information. Your health depends on it. Insure chemicals are handled and stored properly to avoid a release to the environment.

General Rules booklet
Handle Materials With Care
...by keeping your hands away from pinch points and avoid placing any part of your body where it could be caught between moving objects. When a job requires that you exert force on an object, be in a comfortable, non-awkward position to avoid strains and sprains. Use safety shoes to help prevent foot and toe injuries and gloves to help prevent hand and finger injuries.

Move About The Plant Safely
... and do not take shortcuts. Use regular walkways, passageways, stairs and ladders. Watch where you walk, especially when walking on gravel and stone surfaces. Stay particularly attentive when you climb ladders and stairways. Step, don’t jump, from one level to another. Safety harnesses are required fall protection for some elevated work - get them from the Fisher Safety Store or talk to your supervisor about how to obtain a safety harness.

Good Housekeeping/Environment
...is essential to the refinery. It will result in fewer accidents, minimize impact to the environment and will reduce the fire hazards. All oil spills must be avoided. In the event of a spill a prompt clean up will minimize slipping, environmental impact, and fire hazards. Passages and walkways must be kept free of welding rods, tools, draped hoses, extension cords and other objects which create stumbling hazards. Cleaning up the area where you are working is part of the job. This is our refinery, if we don’t take care of it, who will?
Avoid Breathing Petroleum Vapors
…overexposure to petroleum vapors may produce a form of intoxication or other serious health effects. If you find yourself exposed to vapors or fumes get to fresh air at once. Report this immediately to your supervisor because repeated exposure to certain chemicals may create long term health hazards. Do not return unless the area has been tested or you’re wearing proper breathing protection.

Asbestos Awareness
… the key is to avoid exposures. Asbestos may be found in older material such as insulation, floor tile, ceiling tile, transit siding, etc. Unless positively identified, assume all material contains Asbestos and do not disturb. Only certified trained asbestos abaters may disturb the material see your supervisor before you begin work.

Read The Bulletin Boards
…and watch the poster board. Safety and Environmental Alerts and lessons learned from incidents will be posted. Read them to learn more about accident and environmental incident prevention.

Be Watchful For The Safety Of Others
…especially visitors who may not be familiar with the operations. They may require a refinery employee escort. If you see them in locations where they are likely to be injured, tell them courteously about the hazards and how to avoid them.

If You See A Fire, Medical Emergency, Chemical Leak, or Spill - REPORT IT!
…dial 5300 from within the refinery to report all Incidents. Assess the potential of the emergency and follow directions as detailed in the Refinery Emergency Plan.

When The Refinery Emergency Alarms Sound
…you should immediately stop all work, shut down all equipment and listen for instructions over the PA system. If you are instructed to evacuate, you should proceed immediately to your designated assembly area. Evacuate upwind of the release. Be sure you know and understand your responsibilities. For more information talk to your supervisor.

Personal Cleanliness And Hygiene
are important factors in maintaining good health. Never use Refinery products to clean personal clothing, or to wash oil or grease from skin. Do not wash fire resistant clothing with family clothes. Insure they are laundered according to refinery procedures.

Rings, Earrings & Long Hair  
... have caused many serious injuries and amputations by catching on or between moving equipment. Employees are cautioned not to wear jewelry while working in the refinery. Secure long hair in a hat or tie back.

GENERAL HEALTH, SAFETY AND ENVIRONMENTAL RULES

It is expected that every employee will comply with the following rules. Any exception to these rules is to be permitted only on direct authority of the supervisor in charge. Should job conditions arise where you cannot comply with a specific rule, see your supervisor for alternate safe practices to follow. When in doubt as to what to do, ask your supervisor.

FIRE PREVENTION RULES

1. Smoking
   All buildings, trailers and vehicles at Toledo Refinery are designated as non-smoking areas by all employees, visitors and contractors.

   Smoking is permitted only in specified smoking areas located outside of certain buildings. Ashtrays have been provided in all of the smoking areas. Smokers are required to minimize the amount of time in the smoking areas and are responsible for keeping the smoking area neat.

   Supervisors are responsible for compliance with this policy within their area of responsibility. Anyone violating the Toledo Refinery Smoking Policy will be subject to disciplinary action, up to and including discharge.

   Contact your supervisor for more information on the Toledo Refinery Smoking Policy.

Toledo Refinery
2. Matches And Lighters
While in the refinery never carry household matches of the “strike anywhere” type nor cigarette lighters without a spring-loaded cover completely enclosing the striking mechanism. Both are fire hazards. The matches can be ignited easily by friction on any surface and a lighter with an exposed striking wheel can produce sparks if it is dropped.

Torch or welder flint lighters must be carried in the open or safe position.

3. Cleaning Fluids
Only approved cleaning fluids may be used for equipment cleaning. Never wash your hands or other parts of your body in distillate of any kind.

4. Iron Sulfide
Iron sulfide is a grainy substance resembling rust except it is darker and coarser. When exposed to air, iron sulfide dries rapidly and generates sufficient heat to ignite combustibles which are contacting it.

Keep iron sulfide wet when removing it from vessels, equipment, or piping during cleaning operations. Remove iron sulfide immediately from areas which could contain flammable or combustibles and dispose of it in a safe and environmentally acceptable manner.

5. Grounding To Prevent Static Electricity Build-up
Use grounding and bonding devices provided when loading flammable products into tank cars, trucks, trailers, or any other containers. All grounding and bonding must be secured before loading operations are started and must remain in place until such operations are complete. Avoid splashing within the receiving vessel whenever possible. Vacuum truck clean-up of hydrocarbons requires grounding of the suction hose because static electricity may be generated.

6. Fire Fighting And Equipment
The company does not want you to risk your life in fighting a fire. Fire fighting equipment is for emergency use only. All such equipment must be kept visible and free of obstructions at all times. Do not use fire protection hoses for a work hose or a service hose.
If you discharge an extinguisher, partially or completely, report it promptly to your supervisor or the Safety Department so the extinguisher can be recharged and returned to its proper place.

For use of firewater for non-fire fighting purposes, you must first contact the Safety Department to obtain a Hydrant Permit. When activating a hydrant insure the hydrant is turned fully open to prevent damaging the hydrant. When done using a hydrant insure it is closed and completely drained to prevent freeze damage.

7. Hot Work
Before starting any HOT WORK you must have in your possession a completed HOT WORK PERMIT. Hot work includes the operation and use of any flame, heat or spark producing tools or equipment

Some examples are:
a. Burning or cutting torches, welding equipment, open fires (salamanders, blow torches, etc.) and soldering irons
b. Sandblasting equipment.
c. Friction tools capable of producing ignition temperatures.
d. Portable non-explosion proof pumps and compressors.
e. Internal combustion engines.
f. Camera flash attachments.
g. Electrical heating elements.
h. Driving vehicles in areas not specifically designated for their use.
i. Temporary electrical cords without explosion proof connections.

A Fire-watch is one or more trained persons with the assigned duty to watch for fire. The Fire-watch is an important facet of a Hot Work Operation. When a Hot Work Permit is marked that a Fire-watch is required a person trained in the use of a fire extinguisher must be assigned to watch the job for fires. Fire extinguishers in the units assigned for emergency use shall not be used as a stand-by for a Fire watch.

No HOT WORK PERMIT is needed for certain approved locations in the refinery such as hot work in the welding shop, and driving on main refinery roadways.
SAFETY RULES

8. Preventing Release Of Flammable Material

No work is to be done on any piping or equipment until one of the following methods has been used to prevent the accidental release of hot, corrosive, toxic, or flammable material through all lines connected to the equipment being repaired:

a) Blanking or disconnecting the pipe lines. This method must be used if the block valves closest to the work site are not effective in shutting off the flow or if there is any doubt that the block valves will not completely shut off the flow. However, if hot work, or entry, is to be done, blanking or disconnecting the lines is the only acceptable method of preventing the release of flammable material.

b) Securely closing block valves, chaining and locking them so they cannot be opened.

c) If a chain cannot be used on the valve, then consider securely closing block valves and firmly attaching to each a “DO NOT OPEN” tag on the wheel or plug so it is readily visible from the operating position.

9. Entering And Working In Vessels And Other Confined Spaces

Do Not enter a vessel or other confined space for any purpose until a properly signed CONFINED ENTRY PERMIT has been issued. Examples of confined spaces include vessels, tanks, sewers, electrical ducts, flues, stacks, fireboxes, water conduits, sumps, wells, manholes, deep pits, etc.

A Test For Oxygen Deficiency and LEL must be made every time an CONFINED ENTRY PERMIT is given for a confined space or vessel. Additional tests may be made when considered necessary by the supervisor in charge. No one shall enter a confined space where the oxygen content is 19.5% or less, and the LEL is 10% or higher. If an oxygen Deficiency exists in any confined space, it must be considered an IDLH atmosphere and special precautions must be taken to work under these conditions.
**Other Special Considerations:** When it is necessary for workers to enter an enclosure where gas or other hazardous materials are present, or may be liberated during the work, a safety analysis will determine the precautions to be taken, including the type of breathing protection required, escape and rescue procedures, and equipment needed for an emergency.

Industrial Hygiene monitoring may be required to detect low level concentrations of chemicals such as benzene, hydrogen sulfide, total hydrocarbons, etc. Consult the MSDS for information on the contents of the vessel to determine what extra testing must be done before entry.

Tanks and other vessels that have contained TETRAETHYL LEAD shall not be entered under any circumstances until an acceptable LEAD-IN-AIR analysis is performed by a competent individual.

10. **Work In Process Areas**

   a) To enter an operating area - you must sign-in and get approval from the operating authority.
   b) A Safe Work Permit must be issued before starting to work on any piece of process equipment.
   c) A Confined Space entry permit is required before entering vessels, tanks, manholes, furnaces, fireboxes, flues, ducts, and other confined enclosures.
   d) A Hot Work Permit is required before starting any hot work.
   e) **Notify the Operator when the job is completed and sign-out.**

11. **Safety Devices On Operating Equipment**

    Do Not Make Critical Safety Devices Inoperative. Examples of equipment safety devices are high or low alarms, overspeed governors, high-temperature cutouts, safety valves, etc. If an authorized person cannot make proper adjustments while the safety device is in service, he/she should tag the safety device “OUT OF SERVICE” and immediately notify the Operations supervisor for that area.
12. **Electrical Equipment**

No one but an authorized person shall connect, disconnect, repair, or adjust electrical equipment. In areas where explosion-proof outlets are provided, use tools, extension cords, etc., equipped with explosion-proof plugs. Obtain a HOT WORK permit to adapt a standard plug for temporary service in an explosion-proof outlet. The plugs must have a proper ground and need to have GFI protection.

Do not remove vapor-proof and explosion-proof globes to attach electrical equipment. Replacement of bulbs in such fixtures will require a Hot Work permit.

Do not use temporary extension lights without protective guards to prevent breakage. In damp or wet locations use only extension lights with approved cords, molded rubber sockets, and GFI protection.

13. **Starting, Stopping Machinery - Opening, Closing Valves**

Do not operate any valves or tamper with controls unless you are specifically authorized to do so. Do not turn on or off any electricity, gas, steam, air, acid, water, etc., or set in motion any machinery or electrical apparatus without proper permission from operator in charge.

14. **Locking-Out Energy Sources To Equipment Under Repair**

No work is to be done on any equipment, machinery, power tools, etc., until positive measures have been taken to insure that all energy sources have been locked out or tagged out to prevent accidents by unintentional release of hazardous energy while the work is in progress. Qualified electricians required to work on live electrical circuits, or changing out breakers “hot” will follow specific safety procedures for that specific job.

In the following procedures, the protective devices used to prevent accidental starting are to be removed only by authorized persons. No one should remove a protective device until all employees have completed their work and are in a safe position.
Electrical or electrically driven equipment shall have the switch or breaker to that equipment positively locked out. Locking-out just the push button station is not adequate. Always test (before the work is started) to be sure the switch or breaker has actually shut off power. If for any reason the switch cannot be locked out, do not start the work - check with your supervisor. The maintenance personnel will also lock out the equipment and it must not be restarted until the maintenance worker removes his/her lockout device.

Steam, Air, or Gas powered equipment shall have the closed power valve secured against accidental opening by a lock or locked chain. The supply line must be blanked if the closed control valve or block valve leaks.

In those few cases when machinery cannot be shut down before cleaning, adjusting or repairing, extra precautions must be taken to do the job safely. These precautions may include careful safety preplanning of the work and wearing necessary personal protective equipment.

15. Guards On Machinery And Power Tools

Do not operate any machinery, power tool, etc., if guards designed for such machinery and tools, are not in place. Use extra precautions in those few cases where machinery must be operated without guards (such as lining up belts or chain drives).

16. Excavations And Exposed Openings

When digging trenches and other excavations, complete a safe work permit, review the underground drawings, check with your supervisor, and, use detection equipment to locate underground objects; such as, buried red concrete, regular concrete, electric power lines, piping, etc.

**Excavations 4 feet and deeper**, require bracing, shoring, or sloping the sides to prevent cave-in, and may require a confined space entry permit.
Always cover, barricade, or rope off excavations before leaving the job. When the work is left uncovered at night, post warnings of a type approved for the area and visible in darkness. Remove barricades, sign, etc., at the end of the job.

When manhole covers, platform sections, valve pit covers, stairs, or handrails must be removed, properly guard the exposed openings. Rope railings are not considered a substitute for handrails.

17. Ladders

Inspect ladders before use. Use only ladders in safe condition, equipped with proper type shoes or spurs for the ground conditions. Remove unsafe ladders from the work area and have them repaired or destroyed. Do not use the top half of an extension ladder by itself as a straight ladder.

If your ladder must be placed on an insecure surface at the top or bottom, have someone hold the ladder while you tie the ladder at the top.

Place a straight ladder so that the base is at a distance approximately one-fourth (1/4) the length of the ladder from the object it is leaning against. Never stand on the top of a stepladder unless it has a working platform. Only one person is allowed on a ladder at one time. Keep both hands free for climbing. Use a hand line to raise or lower light materials or tools. When working from a ladder at least one hand must be used to grasp the ladder and both feet must be on a ladder rung if no other Fall Protection is being used.

18. Warning For Railroad Car work

DO NOT load, unload, clean, repair, or do any other work on any railroad car until blue warning signs or lights are posted at the head, or both ends of the spur track. If derailing devices are provided, be sure they are locked in position.
19. Scaffolds And Working Platforms

Properly construct and locate all scaffolds so they will not obstruct passageways, exits, fire fighting equipment, or operating controls. Before using, always check that your scaffold has all structural parts in place including handrails, midrails, and toe boards.

**Makeshift scaffolds are not permitted!** A competent person will approve a scaffold and tag it appropriately. Do not use a scaffold if it is not tagged or has a Danger tag. If a scaffold is tagged yellow use required PPE based on hazards listed. A green tag indicates a scaffold is safe to use.

**Do not modify scaffolds.** Only a competent scaffold builder can modify a scaffold. If a scaffold is modified the tag must be changed to reflect the condition of scaffold and competent person notified. Scaffolds that cross walkways must have areas below be roped off or have signs showing that men are working above.

20. Compressed Gas Cylinders

Handle Gas Cylinders, such as those for oxygen, acetylene, carbon dioxide, chlorine, nitrogen, etc., WITH CARE so pressure will not be released suddenly. Do not abuse, or misuse them by dropping, banging together, striking, etc.

**Always secure cylinders** (preferably upright), to a suitable support WITH A CHAIN OR OTHER SAFETY BRACKET. Never lay an acetylene cylinder on its side. Other cylinders may be laid on their sides IF THEY ARE SECURED FROM MOVING.

**Keep protective caps on cylinders** except when they have piping or control valves attached to the cylinder outlet. Remove such connections and install protective caps on cylinders when they are transported. Always check the label or the stencil on the cylinder to make certain you have the proper gas. If you are in doubt about the contents of a cylinder, see your supervisor before using the gas. Never use fittings to make a cylinder mate to a regulator. This may connect the wrong gas with the system. Do not allow
oxygen to contact oil and grease. Oxygen must be stored at least 20 feet from any combustible gas or be separated by a firewall with a 1/2 hour fire rating. Large numbers of oxygen and acetylene cylinders can not be stored together. They must be separated. Never cut or weld directly above the oxygen and acetylene equipment. The hot metal may damage hoses and start a fire.

When cylinders are left unattended with the hose and torch connected, always close the CYLINDER VALVES and release the pressure in the hoses. Be sure a check valve is installed to prevent oxygen and acetylene from mixing in the hoses.

21. Compressed Air

Do not use compressed air to blow dust from clothing. It might cause small sharp particles of rust to be embedded in the skin or eyes. Such air might enter an open wound, get into the blood stream, and cause serious injury or death. Horseplay with compressed air is dangerous. DO NOT DO IT!

22. Nuclear Radiation

Only persons authorized by the radiation safety officer shall operate or service devices or equipment which is a radiation source. Radiation isolation procedures must be used to service this equipment.

Radiation producing devices and equipment shall be designated by approved radiation warnings signs.

When such devices are used, such as x-raying pipe, suitable and properly identified barricades (using NRC warning signs) must be erected to keep other employees clear of the area involved in the radiation. Never cross a barricade with a radiation warning sign.

23. Working Overhead

When working overhead, make sure workers below are aware of your presence. For example, above a roadway, walkway, or other location where workers or passers-by
might be endangered. Place a suitable warning sign below and barricade off the danger area. **When performing work at a hazardous elevation six (6) feet or more above lower level**, except on a ladder or on a platform protected by approved handrails. WEAR A BODY HARNESS WITH THE LANYARD attached to a solid support. Other working conditions requiring the use of a body harness are: On a suspended scaffold, working in a pipe alley, in a hopper car unloading material, over a condenser box or sump containing hot water, or over large open refinery water supply intakes, man baskets, or mobile man baskets. Two lanyards may be required for some jobs.

24. **Piling And Storing Material**

Always stack and pile material to prevent it from falling or causing some other pile to fall. For example, cross-tie bags and wedge and chock pipe.

Store materials so they will not obstruct the front aisles, walkways, stairs, ladders, exits, or safety and fire protection equipment. Do not pile combustible material in contact with hot surfaces such as light bulbs, steam lines, and process piping.

25. **Hand Tools**

Always wear appropriate eye and hand protection when using these tools. Only use tools in good condition. Do not use files without handles, tools with mushroomed heads, burrs, or cracks, weakened or broken handles. If tools become defective during use, turn them in for repair or exchange.

Powered hand tools, such as grinders with out dead-man switches shall not be used. Use the proper tool for the work involved. Keep all sharp-edged tools sharp for safe, efficient work. Carry sharp or pointed tools in specially designed holsters. Safe use of hand tools rests with the user.

26. **Hoisting Operations and Equipment**

**Inspection:** Inspect Hoisting Equipment to be sure it is in safe operating condition before using it. Check for broken wire strands, frayed fiber rope, stretched chain links and bent hoist hooks. Tag damaged equipment for repair.

*Toledo Refinery*
**Signals:** Every employee who directs lifting operations and every operator of lifting equipment must KNOW AND USE THE STANDARD HAND SIGNALS shown below.

![Hand Signals Diagram]

One person shall be designated to give signals to the hoist or crane operator. No one else in the crew except this person should give signals to the operator. The operator should respond only to those signals given by that designated person.
Area Protection: Always keep clear of suspended and moving loads and warn others who come within danger. When using a hoist, barricade off the operating area and post danger signs. Never lift over people or operating equipment.

Guiding Load: Keep hands off moving rope or cable. If it is necessary to guide the load to keep it under control, use tag lines. Keep hands from getting pinched between a moving load and a stationary object.

When there will be loss of sight with a crane operator, appropriate radio communication can be established with the crane operator to safely direct the lift.

Electrical Hazards: Whenever electric power lines are located where they could be contacted in the course of your work be sure one of the following precautions, listed in order of preference, is done before the work starts.

a. Cut power from lines. (Lock-out switches, tag, etc.)

b. Provide physical protection to prevent any contact with power lines. No boom should be located within 10 feet of an overhead electric power line.

 definito do not touch or lean against any part of lifting equipment in operation in the vicinity of overhead power lines.

27. Driving, Riding Company Vehicles

When driving a company vehicle, or bicycle you are responsible for its safe and legal operation inside and outside of the refinery. Wear seat belt and shoulder harness in vehicles at all times when driving.

As a driver, do not transport either people or material in your vehicle until the following conditions are met:

• Follow all traffic laws. Watch for pedestrians coming into roadways from behind doorways or corners. Pedestrians have the right-of-way.

• Always drive very slowly through steam, cooling tower fog or dust. Honk your horn every few seconds to warn other vehicles and pedestrians of your approach. Turn lights on.
• All material is properly secured so it will not roll, slide or fall while in transit.
• Chock wheels if vehicle is left running unattended.
• Do not move vehicle until all passengers have fastened their seat belts.
• Passengers of trucks are seated on seats specifically provided for carrying passengers. No passengers are to be carried in the rear of a any truck.
• Material extending beyond the end or sides of the vehicle is properly identified with visible warning flags attached to the ends of any extending materials.
• No passengers will ride on cherry pickers, bulldozers, cranes, and similar vehicles unless safe seating has been provided.
• All passengers must be seated with seatbelts fastened when vehicle is moving.

Riders MUST NOT get on or off a moving vehicle, nor ride with arms, feet, or legs extended over the sides or end of the vehicle. The driver should never leave the driver’s seat while the engine is running unless the wheels are properly chocked.

28. Horseplay
Horseplay, wrestling, and fighting are not permitted.

29. Reporting Personal Injuries And Illnesses
All personal Injuries and Illnesses occurring in the refinery must be reported to your supervisor and given first-aid treatment immediately. Delay in treatment can lead to serious disabling infections. Notify your supervisor before leaving your work site for first-aid treatment.

If you are unable to report for work because of an injury or sickness occurring in the refinery, notify your supervisor, superintendent, or the Health Center at once so arrangements can be made for you to receive prompt medical attention.
30. Investigations

All incidents and near misses involving injuries, property damage, and environmental impacts will be investigated to determine their cause in an effort to prevent a reoccurrence. A report of the investigation outlining all immediate and basic causes with recommendations to prevent their reoccurrence will be completed and submitted to the HSE Department. All individuals involved in the incident will participate in the investigation and give full co-operation.

31. Cell Phones, Two-way Pagers

Cell phones and two-way pagers will not be used in process areas. If carried into process areas cell phones and two-way pagers will be turned off. This equipment may be used in control buildings or on roadways outside of process unit boundaries.

PERSONAL PROTECTIVE EQUIPMENT RULES

32. When PPE is Required

BP employees, contractors, visitors etc., will generally not be required to wear PPE inside building or enclosed vehicles. BP employees, contractors, visitors etc., will generally not be required to wear PPE inside the ‘green zone’ on the attached map. This exception is intended to allow people to travel to/from points in the ‘green zone’ without PPE. A pre-task risk assessment shall be conducted for all jobs inside the ‘green zone’ to determine the appropriate PPE for the job. PPE is not required when walking to/from and enclosed motor vehicle and a building outside the ‘green zone’ provided the parking space is in close proximity (<50’) to the building and not in a process unit.
33. Work Clothing

**Wear adequate clothing suitable for your Job.**

a) Do not wear loose, ragged clothing, or neckties near moving or rotating machines.
b) If clothing becomes saturated with oil, chemicals, or paint, change to clean clothes at once. Clothing soaked with these materials present a constant personal fire hazard and continued contact with the skin may cause irritations. Consult the MSDS sheet for proper first-aid attention and decontamination. Notify your supervisor of the exposure.
c) Wear fire resistant clothing as the outer most garment while in the refinery unless authorized otherwise by the Safety Department. (See Fire Resistant Clothing Procedure)
d) Wear gloves whenever practical when working in the refinery.

34. Head Protection

A **Hard Hat** is an essential piece of your work clothing. It **Must Always Be Properly Worn with the Bill Forward** in the refinery unless authorization is given to work on a specific job without this protection.

35. Hearing Protection

Loud noise may damage your hearing. Hearing protection shall be worn in any location or during any specific tasks where the noise is such that prolonged exposure might be harmful to a person’s hearing. Hearing protection is required in all process units in accordance with the refinery safe work practice.

36. Fall Protection

Employees working on **unprotected surfaces greater than 6 feet from a lower level shall be protected** from falling by the use of guardrail system, safety net systems or personal fall arrest systems. **Only approved full-body harnesses with a six (6) foot lanyard are acceptable** personal fall arrest devices. See the refinery Fall Protection Policy for more information on the use of fall protection in the refinery.
37. Other Protective Clothing And Equipment

Wear special protective clothing and equipment provided by the company and designated for a given job. Examples of special safety equipment that might be required for a specific job are: chemical resistant, heat resistant and other types of protective gloves; chemical clothing; respirators; boots; safety belts/harnesses; auto safety belts; protective hoods of all kinds; foot guards; disposable coveralls; aluminized heat resistant clothing; fire resistant clothing; hearing protection; and skin protection creams, etc.

38. Eye Protection

Wear approved safety glasses having rigid side shields as minimum eye protection except in offices, control rooms, and locker rooms when there is no danger of eye injury.

Additional eye protection, such as goggles, acid-type goggles, and face shields, is required for work extra hazardous to eyes, such as:

- Operating grinding wheels, even when fixed guards are provided.
- Chipping, cutting, shearing, drilling or hammering metal and other material where chips might fly.
- Using jackhammers, picks, chipping bars, or sledgehammers.
- Sandblasting, turbining tubes.
- Cleaning machinery or equipment with steam, water, or compressed air.
- Working with, or near equipment containing caustic, acid, or other corrosive materials.
- Handling powder or semi-powdered material or while in an area where there is a dust hazard.
- Scrapping, chipping and brushing scales, rust and other deposits from surfaces.
- Working on equipment known or suspected of being under pressure, such as adjusting pump packing, valve packing, opening vents and drains, drawing samples from sample connections, and loosening flanges.
- Lighting furnaces and when opening cover plates for inspection of furnaces or other operating equipment.
- Pouring or handling molten material (metals, asphalt, and other hot materials) in open containers.
• During all welding and burning operations.
• During conditions when dust, rust, catalyst, and other foreign material is airborne.
• Breaking containment on any process line or vessel.

39. Respiratory Protection

Wear respiratory protection whenever it is necessary to enter or work in an atmosphere known or suspected of containing harmful concentrations of gas, vapor, dust, or mist, when there is a deficiency of oxygen in the breathing air, or the breathing air is above 100F.

A specific type of breathing protection is required and provided for each contaminant and air condition you may encounter in the refinery. See your safety specialist for the proper equipment to use. To assist in respirator selection refer to sections 7 & 8 on the Safe Work Permit.

Facial hair may affect the seal of the mask required for breathing protection. Employees are cautioned not to have beards or long, thick sideburns. Employees that are required to wear respiratory protection are not permitted to have facial hair that touches the sealing surface of the respirator. The Facial Hair Policy describes these requirements in detail. See pictures for guidance on acceptable facial hair.

![Facial hair policy](image_url)

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Here is a list of some of the working conditions where respiratory protection is required:

- Spray painting
- Handling dry chemicals or other materials that produce dust in harmful concentrations.
- Handling insulation containing asbestos (or suspected of containing asbestos) requires special precautions.
- Entering or working in an atmosphere known to contain, capable of producing, or suspected of containing hydrogen sulfide, tetraethyl lead, or harmful concentrations of carbon monoxide, sulfur dioxide, benzene, methanol, ammonia, etc. oxygen (less than 19.5% in the breathing air). Oxygen deficiency can only be determined by using a tester which will measure the amount of oxygen present.
- Sour crude oil presents a particularly serious hydrogen sulfide hazard. Employees shall always wear respiratory equipment while inspecting, gauging, drawing samples, performing repair work on tanks or equipment containing this type of crude oil, or when descending for any purpose to the floating roof of a tank containing sour crude oil.
- Entering or working in atmospheres containing concentrations of hydrocarbons or Benzene above the permissible exposure limits. Consult the MSDS for the material properties and use testing equipment to determine concentrations of air contaminants.
- Sandblasting operations. A supplied air hood specifically designed for this work must be worn.
- Welding in confined spaces where there is not sufficient ventilation provided to remove fumes.
- Entering excessively hot areas (over 100F) where it would be harmful to breathe the heated air. The Safety Supervisor should be consulted to determine how to protect personnel during the work.
- Entering or working in an unventilated location known or suspected of having a deficiency of oxygen (less than 19.5%) in the breathing air. Oxygen deficiency can only be determined by using a tester which will measure the amount of oxygen present.
PROCESS SAFETY MANAGEMENT  
- OSHA RULE 1910.119

**Background and Intent:**
The OSHA PSM Rule was written in response to industrial accidents like Bhopal, India where a leak of toxic Methyl Isocyanate killed more than 2000 people and the explosion at the Phillips Petroleum plant in Pasadena, Texas that killed 23 and injured 130 others. OSHA wrote the PSM rule to improve the control of toxic, flammable or explosive materials in process plants. OSHA does not define how companies are to do this. Instead they set guidelines and describe the management system to accomplish the intent of the rule. At BP Toledo, we have reviewed the PSM rule to determine what specific things we need to control the risk of making gasoline and other products. PSM contains the following sections:

1) **Employee Participation**
The unit HazOp studies, procedures, training materials, Process Safety Information (PSI) and audits were developed, revised and updated using BP Toledo employees who operate, repair and are knowledgeable on the refinery processes.

2) **Process Safety Information**
The P&ID drawings, electrical classification maps, equipment records, PSV data, and other information is archived and kept up to date so that we can evaluate, operate and repair equipment properly.

3) **Process Hazard Analysis**
A HazOp study of each of the process units was conducted by May 26, 1997. The recommendations from these studies are on file and are being addressed per a priority schedule. What-If reviews and HazOps studies are completed for new equipment and changes to the refinery per the Management of Change requirements.

4) **Operating Procedures**
Over 1000 procedures are in place that were written to standardize the way complex operating tasks are completed. These procedures are certified annually to assure that changes to the process are incorporated into them.
5) Training
Training of operators and maintenance personnel is done to improve and maintain the skills of the workforce. This is an integral part of controlling the hazards of the refinery.

6) Contractors
Contractor safety programs are in place to monitor, train and control the activities of contract employees in the refinery.

7) Pre-Start-up Safety Review
Before equipment is put into service the installation is checked against design to assure that it was built to standard, that people know how to operate and maintain it, and that the records for this equipment are up to date.

8) Mechanical Integrity
A plan to control the refinery equipment purchase, inspection and repair is in place. The details of this plan include requirements for training of metal inspectors, inspection methods, control of PSV inspection and maintenance, control of alloy piping, QA/QC procedures, etc.

9) Hot Work Permits
Hot work permits have been in place in the refinery for years.

10) Incident Investigation
Investigate incidents and near misses, determine the root cause, make recommendations to correct the root causes, and share the lessons learned.

11) Emergency Planning and Response
Train, plan and prepare for emergencies to minimize the impact of the emergency.

12) Compliance Audits
Review the refinery program performance.

13) Management of Change
Changes to the refinery processes must be controlled. When installing new piping, equipment, chemicals, changing procedures or instrument logic (or disabling instruments) follow Management of Change Guidelines and be sure we:

- Review the risk of making the change and improve the design to address concerns.
- Make sure the system is built to specs and standards appropriate for the service.
- Teach people how to operate and maintain the system.
- Update refinery records so we can repair it properly and modify it.

Toledo Refinery
MANAGEMENT OF CHANGE GUIDELINE

The Management of Change guideline is required if any of the following questions are answered yes:

1) Is there a change in the P&ID (piping, equip., metallurgy, instrument or control logic)?
2) Is this a new installation (not replacement in kind) of process piping, process equipment, controls or control room ventilation?
3) Is a new chemical, additive, feed being used? (Chemical addition system injection point being moved, quill changed, material changed?)
4) Are instruments, instrument control logic, shutdowns and alarms being changed from the original design? (in a way not covered by training or procedures)
5) Are the new operating conditions outside the equipment design range?
6) Are procedures being changed such that people need to be retrained on them?

MOC (Management of Change) has the following steps to it:

1) Define the design of the change, markup P&ID and Plot Plan, determine how the change will work.
2) Get approval of the Area Team Leader responsible for that area.
3) Review the risk of making the change to the process, complete a HazOp, What-If or What-If checklist.
4) Explain to people (operators, supervisors and maintenance) how it works and how to repair it.
5) Make sure it is built to appropriate specs. and code and that people know how to run it and fix it.
6) Update the records to include the change.

Employees Required to use MOC

Anyone who can make a change that affects the design of the process is required to use the MOC guideline before a change is made.

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Employees initiating the MOC process could be:

- An operator who disables an alarm or shutdown trip
- An engineer coordinating the installation of a check valve,
- A new block valve or bypass around a control valve
- An instrument foreman adding an H2S detector to the Nerve Center ventilation system
- An margin driver selecting a new crude for refinery processing
- A maintenance foreman changing the setpoint on a PSV
- A person bringing a new chemical into the refinery (chemical sales rep) and many others

**Pipe Clamps**
The refinery On-Stream Leak Repair Practice represents the process that has been in place for many years before the OSHA PSM rule took effect. This guideline formalizes the process and assures that PSM requirements are met. This guideline needs to be followed when applying clamps and engineered boxes to contain leaks.

**Procedure Changes**
Process changes tracked by an MOC may or may not require procedure changes. Those procedure changes will be verified during the PSR for the MOC. Procedure changes (independent of process changes) that do not require retraining of the operators do not require MOC control. Operations procedure changes (independent of process changes) that do require operator retraining follow MOC.

**Operational Changes**
Changing the function of alarms, shutdown devices, and other operational changes in the refinery may alter the operators control over the unit. These changes require that the risks be managed. This area of MOC does not fit the WO and small project methods well because these changes happen on shift. The people who are trained to control alarms, shutdowns and operational parameters are the STM, STS and operators. These people have the training, knowledge and authority to evaluate the risks of different operations.
GENERAL ENVIRONMENTAL AWARENESS

Employee’s Responsibility:
• Support the intent of the refinery’s environmental policy:
  No Damage to the Environment, Comply with Regulations, and Continual Improvement
• Know the Environmental impact of your activities and of the process area in which you work.
• Support the overall environmental management system.
• Help achieve the environmental objectives and targets.
• Take appropriate steps to prevent or minimize adverse Environmental impacts.
• Contact your supervisor or Environmental Team if unsure of Environmental impacts.

General Procedures
• Follow established refinery procedures and work permit processes.
• Stop work if you are unsure of the Environmental Impact. Contact supervisor or Environmental Team member for assistance.
• Report spills, releases to air, water, and/or soil to supervisor or foreman immediately.
• Clean up work area after completion of work activity.
• Minimize any odor producing activities. Contact your supervisor for guidance.

Air Impact Prevention
• Do not open/depressure vessels, tanks, pumps, lines, etc. to atmosphere without approval.
• Notify your supervisor and Environmental Team of any valve, pump, compressor, or flange discovered to be leaking by observation, smell, or other means.
• Keep open-ended lines capped, plugged, or double-blocked when not in use.
**Water Impact Prevention**
- When working at the Marine Dock or near Driftmeyer Ditch, do not allow chemicals, products, oils, fuels etc. to get into the water.
- Minimize the draining of excess oil, caustic, acid, and/or amines to the sewer. Prepare a sewer discharge log prior to draining any material. Refinery Coordinator and the Wastewater Treatment Plant operators must be notified.
- Do not drain unusual chemicals or other products (i.e. paints, solvents, etc.) to refinery sewers without prior approval from the Environmental Team.

**Soil Impact Prevention**
- Prevent soil contamination → no chemicals or hydrocarbons should be drained to the ground.
- When servicing equipment, if products or chemicals are present (remaining) in piping, vessels, pumps and other equipment, do not allow to drain to the ground.
- All pipes, equipment, vessels etc. sent to the “bone yard” as scrap, must be free of oil, caustic, acids, and/or any other chemicals.
- When refuelling vehicles and equipment, do not allow fuel to spill to the ground.

**Waste Disposal Issues**
- All wastes must be properly disposed of in accordance with applicable regulatory requirements. Do not dispose of wastes without contacting the Environmental Team for proper waste disposal guidance.
- Do not mix refinery waste with general trash.
- General trash is disposed of in dumpsters throughout the facility.
- Refinery waste must be placed in approved containers.
- Hazardous or Special Waste can be disposed of in yellow 55-gallon drums obtained from the warehouse or lined roll-off boxes secured by the BP job supervisor.
- Refinery Waste containers must be covered after material has been added.
- Blank Waste Handling and Notification Forms are attached to approved containers.
• The person responsible for the activity generating the waste must complete the Waste Handling Notification Form and return it to the Environmental Team.

• Any contaminated soil must be managed according to the refinery’s Contaminated Soil Policy. Contact the Environmental Team for guidance with the policy.

• Minimize/prevent solids from entering the sewer (i.e., gravel, coke fines, sand, soil). Oily solids removed from the sewer system and at the WWTU are classified as hazardous waste.

• Do not dump spent solvents (degreaser) into the sewer system or on the ground.

• Do not dig in Solid Waste Management Units (SWMUs). Contact the Environmental Team for information on SWMU locations.

• Do not enter Hazardous Waste Management Units without authorization. Contact the Environmental Team for locations and authorization.

If you have any questions regarding these environmental guidelines call (419) 698-6400 and ask for an Environmental Team Representative.
Toledo Refinery
BP Products North America Inc.
P.O. Box 696
Toledo, Ohio 43697-0696