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1.0 Purpose

1.1 The purpose of this policy is to establish guidelines for safe and consistent isolation of refinery equipment and machinery at the Galveston Bay Refinery (GBR) to facilitate servicing, maintenance and testing.

2.0 Scope

2.1 The scope of this policy applies to the servicing, maintenance or testing of all refinery equipment and machinery that may be subject to unexpected energizing or release of stored energy causing

2.1.1 Injury to personnel,

2.1.2 Adverse environmental impact, or

2.1.3 Damage to equipment

3.0 Out of Scope

3.1.1 This policy does not apply to Minor Servicing Activities, Hot Taps, In-Service Welds and activities under Exclusive Control

4.0 Equipment Shutdown and Isolation Process

Important: See Attachment A: Minimum Energy Isolation Requirements for detailed information on isolation requirements.

4.1 Preparation:

4.1.1 The shutdown of refinery equipment, machinery, and/or systems, required for servicing/maintenance shall be conducted by the Owning Department. Master Isolation Lists must be prepared in advance by the Owning Department Representative and developed consistent with the Minimum Energy Isolation Requirements (Attachment A). The Master Isolation Lists will specify the energy isolation devices, isolation verification points and the means to verify control of hazardous energy to safely prepare the equipment for the servicing representatives.

4.1.2 Additions, deletions and changes to the isolation lists must be approved by Owning Department Supervision or designee.

4.1.3 Locations where tubing, unions, pipes, etc. have been disconnected as part of the isolation shall be included on the blind list.

4.1.3.1 Disconnected piping shall be positioned so that it does not remain in alignment with or within close proximity to the isolated equipment.

4.1.3.2 A Master Isolation List is not required while working on equipment that has a single isolation point that is locked out and tagged. Examples include, but are not limited to, AC units, lighting circuits, etc.

4.1.4 Equipment should be prepared for maintenance activities per GBR specific operating procedures and in accordance with guidelines outlined in PR-11 Safe Equipment Preparation.

4.1.5 All bleeders and valves used to verify equipment has been de-pressured and will remain open during the maintenance work must, at a minimum, be tagged open with a Orange bleeder tag (Attachment J) and listed on the Master isolation list in the section of the form designated “Energy Isolation Device Identification.”
4.1.5.1 In some cases, the checks to ensure that a fully de-energized system exists will involve equipment that will not be locked or tagged out. Examples include bleeder valves that are opened to verify the system is de-pressured but will not remain open for the duration of the maintenance work or electrical motor switches that do not get locked out because the upstream electrical breaker is the energy isolation point. These isolation verification points shall be listed on the Master isolation list, along with the means used to verify control of the hazardous energy and any special instructions, in the section designated “Verification of Isolation.”

4.1.6 Tagging valves that will remain open during the maintenance work will help ensure the equipment/system remains in a controlled energy state. This practice will also help ensure that the valves are closed before the equipment/system is returned to operation.

4.1.6.1 When installing and removing primary isolation point (PIP) blinds, the appropriate vent/drain valve between PIP and the blind must be opened prior to installing/removing the blind to verify the system is de-pressured. This valve only needs to remain open and tagged if continuous bleed is needed to facilitate the blind installation/removal.

4.1.7 The practices in 4.1.5 and 4.1.6 of this stage shall only apply to routine (non-shutdown) related work.

4.2 Isolation and Lockout/Tagout: Owning Department shall perform the following:

4.2.1 Isolate the hazardous energy according to the Minimum Energy Isolation Requirements (see Attachment A) and the Isolation List.

4.2.2 Following the Owning Department’s isolation, arrange for the isolation of maintenance required tasks such as blinding, high voltage breaker deactivation (Operators may operate molded case circuit breakers in motor control centers and panels 480V and below; disconnecting switches 480V and below), plug installation, etc. as required by the isolation list(s) with the craft initialing the step complete and in accordance with the Minimum Energy Isolation Requirements (Attachment A).

4.2.2.1 When installing isolation blinds ALWAYS think about how the air free and blind removal process is going to be executed. The use of a bleeder blind should be considered where feasible, if:

4.2.2.1.1 A bleeder is not present to properly air free the system, or

4.2.2.1.2 An isolation valve is known to be leaking and there is not a bleeder present between this isolation valve and the blind location. See section 4.2.5.

4.2.2.1.3 See Section 5.4 for additional guidelines on the use of bleeder blinds

4.2.3 Verify that equipment and/or piping is completely de-energized and de-pressured according to the instructions in the “Verification of Isolation” section of the Master isolation list. This verification should include:

4.2.3.1 Opening a bleeder or valve in close proximity to the work location. For large/complex systems multiple bleeder and valves should be opened to ensure that the entire system is de-energized and de-pressured.

4.2.3.2 Pushing any start buttons on pumps, compressors, fans, etc.

4.2.3.3 Taking any other physical actions necessary or any actions outlined in Owning Department procedures.
4.2.4 If de-pressuring or de-energizing cannot be verified (e.g. absence of a bleeder to relieve pressure), then proper line breaking process must be followed with additional precautions implemented to protect workers. This may include:

4.2.4.1 Using additional/specialized PPE as dictated by the Invasive Work Risk Assessment Score or some other form of hazard assessment, or

4.2.4.2 Having fire protection onsite and attended, or

4.2.4.3 Utilizing a qualified electrician to test equipment.

4.2.5 If the equipment cannot be adequately de-pressured/de-energized or it cannot be verified as de-pressured, then the Owning Department supervision (Day Foreman or designee) and Maintenance Supervision (Superintendent or designee) must sign the work permit to designate their approval to proceed with the work, methods to de-pressure/de-energize and the precautions being implemented. The requirement only applies to the following services: hydrogen, flare gas, corrosives, and high temperature hydrocarbons (>400°F).

4.2.5.1 The potential for liquid to remain in a de-pressured system exists, therefore the Owning Department must ensure no liquid material remains or incorporate additional measures (PPE) to protect workers.

4.2.6 Affix Orange Owning Department equipment isolation locks or tags (if applicable) to all subject valves, actuators, motor starters, circuit breakers, etc., according to the Master Isolation List(s).

4.2.7 The Owning Department will then affix a Owning Department Silver lock and energy isolation tag to the appropriate Master Lockbox. The Owning Department should also attach the "MPC Equipment" tag (Attachment E) to Owning Department Silver lock on the Master Lock Box.

4.2.8 All servicing representatives shall then affix a Group Lock (Contractor Company Identification lock or Maintenance Task Tracking lock) to the Master Lockbox and all "Authorized Employees" shall then affix their personal lock to either the Master Lock Box or an appropriate Satellite Lockbox. All locks must be tagged or labeled for identification. This requirement is in effect for normal operations and maintenance. During TAR and major construction projects, an alternative accountability process may be used. The alternative procedure must meet the requirements of Chapter 4 Section 6 of the OSHA Compliance Directive – Control of Hazardous Energy (CPL-02-00-147). The requirements for alternative procedures are listed in Section 12.0.

4.2.9 The Owning Department Representatives shall conduct the Joint Jobs Site review of all isolation points with affected servicing group representatives as required by PR-3 Safe Work Permit policy.

4.3 De-isolation

4.3.1 Servicing Group Representative(s):

4.3.1.1 Informs the Owning Department that the work is complete and equipment and systems are ready for removal of blinds/energy isolation devices at the Owner’s discretion.

4.3.1.1.1 The Servicing group will sign the bottom of the Master Isolation List/Blind List when isolation is no longer required.

4.3.1.2 Following the removal of a bolted slip blind, blind flange, plug, etc., shall return any blind identifiers (tags) to Owning Department personnel and sign and date the appropriate blind list at each listed blind point for which they removed a blind.
4.3.1.3 After all work is completed, authorized employees remove their personal locks

4.3.1.4 Remove Group Locks (Company or Craft locks).

4.3.2 Owning Department Personnel:

4.3.2.1 Verify work is complete by reviewing job location and through communication with the servicing representatives.

4.3.2.1.1 The Owning Department will sign the bottom of the Master Isolation List/Blind List once it is determined work is complete and isolation is no longer required for work.

4.3.2.2 Prepare equipment and systems for the removal of blinds per Safe Equipment Preparation policy.

4.3.2.3 Prior to the removal of any personal locks, issues the servicing representatives a work permit and direct the removal of blinds/energy isolation device, reconnection of electrical power and hydraulic/pneumatic lines, and re-energization of the electrical source according the isolation list(s).

4.3.2.4 Prior to removing “Owning Department” locks, at a minimum, one of the following methods must be completed to verify that the equipment is fit for service following maintenance activities:

4.3.2.4.1 **P&ID Walk down:** Utilize the complete system P&ID for the affected area to verify and document that all affected bleeders/valves are closed, plugged and capped and all flanges parted have been checked to ensure the gasket is installed correctly and have been checked for loose bolts by completing ping and ding check.

**Note:** The completed and signed P&ID shall be turned into the Owning Department supervision to review.

4.3.2.4.2 **Pressure Leak Test:** The equipment and/or piping within the maintenance scope shall be leaked tested by either:

4.3.2.4.2.1 Pressuring the system with a utility (steam, soft water, condensate) and visually checking for leaks.

4.3.2.4.2.2 When using steam, caution should be taken to ensure that equipment MAWP and MAWT is not exceeded and to avoid pulling a vacuum on the system.

4.3.2.4.2.3 When liquid filling equipment, a review should be completed to ensure the equipment is structurally designed to handle the volume of liquid.

4.3.2.4.2.4 Ensuring that the utility selected is compatible with the process and metallurgy.

4.3.2.4.2.5 The completed and signed document shall be turned into the Owning Department supervision for review.

4.3.2.4.2.6 Reference Pressure Testing of Process Equipment GBR-HESS-S-25
Note: The use of air is not a recommended practice. The use of air requires the completion of a hazard assessment and approval of the Owning Department Area Supervisor.

4.3.2.4.3 Pressure the system with nitrogen and complete a hold step.

4.3.2.4.3.1 Reference Pressure Testing of Process Equipment GBR-HESS-S-25

4.3.2.4.3.2 During the hold step, the system pressure should be monitored closely. Flanges parted and other connections made up during the maintenance work shall be checked for leaks using a leak detection solution (e.g. Snoop). Caution should be taken to not exceed the MAWP of the equipment/piping.

4.3.2.4.3.3 If a hold step cannot be completed, a system walk must be completed to identify the leak source.

4.3.2.4.3.4 The equipment cannot be returned to service until a successful pressure test is completed.

4.3.2.4.3.5 The Owning Department shall have a means to document that the pressure test was completed, all affected bleeders/valves are closed, plugged and capped and all flanges parted have been checked to ensure the gasket is installed and have been checked for loose bolts by completing a ping and ding check. This can be done in the form of a procedure, checklist, work closure form or other equivalent means. The completed and signed document shall be turned into the Owning Department supervision for review prior to placing in service. (See Attachment E.)

Exception: The requirements outlined in this section apply to routine maintenance or servicing activities in which energy isolation was applied and invasive work was performed. Further, the requirements only apply to work performed on equipment in hydrocarbon, corrosive, toxic or hot service (>140°F) and are applicable to activities performed by either Maintenance or Operations/Product Control. The following items are not subject to these requirements:

- Equipment in utility service with an operation temperature below 140°F
- Items considered as minor servicing activities or exclusive control. These are not subject to energy isolation.

4.3.2.5 Remove any remaining Owning Department equipment isolation locks from valves, actuators, motor starters, circuit breakers, etc.

Note: If used, complete the “MPC Equipment Return to Service Checklist” in Attachment E.
4.3.2.6 When valves are car sealed open/closed under normal operations and are used in an isolation the valves must be:

4.3.2.6.1 Verified to be returned to their correct operating position per RRD-REFY-7705 GBR Car Sealed Valve Practice

4.3.2.6.2 Secured using a car seal

5.0 Blinding

5.1 Blinding Open Ended Lines or Equipment

5.1.1 Open ended piping or equipment that is only isolated by a single valve must be blinded with a Green Isolation Blind Tag if the work extends past the current maintenance shift, unless it is continuously worked to completion in the field.

5.1.1.1 A pump case cover with a bleeder valve may be used in place of a blind if it is designed for the pressure and service.

5.1.1.2 Double block and bleed may be used in place of a blind in accordance with Section 9.1.

5.1.1.3 This requirement only applies to the following services:

5.1.1.3.1 Hydrocarbons,

5.1.1.3.2 Corrosives, and

5.1.1.3.3 Toxics

5.1.1.3.4 High pressure water and steam

5.1.1.4 This requirement does not apply to TAR and project work when perimeter/blinding and decon has been completed.

5.1.1.5 Bleeders and valves that are locked or tagged open as part of the energy isolation process (e.g. to verify equipment is de-energized/de-pressured) are not subject to this requirement.

5.1.2 If a blind is installed, it must be located between the isolated valves and the equipment being worked on. Bleeders must be closed between isolation valves and blinds.

5.1.3 When installing and removing primary isolation point (PIP) blinds, the appropriate vent/drain valve between the PIP and the blind must be opened prior to installing/removing the blind to verify the system is de-pressured. This valve only needs to remain open and tagged if continuous bleed is needed to facilitate the blind installation/removal. The valve should be closed after blinding is complete.

5.2 Hot Work and Blinding

5.2.1 Blinds shall be installed according to the Minimum Energy Isolation Requirements (Attachment A) and at the closest flange to the hot work.

5.2.1.1 If blinding at the closest flange creates additional risk, exceptions must be reviewed and approved by the Operations and Maintenance Foreman.

5.2.1.1.1 The piping at the new location for the isolation point shall undergo the same cleaning preparation (i.e. wash, steam, etc.)

5.2.2 The isolation blind for Hot Work must be tagged with a “Hot Work/Hydro Test” tag (Appendix I) listing the Owning Department and blind number.
Note: Blind location requirements do not apply when perimeter or battery limit blinds are utilized and the unit has been decontaminated. Additional blinds closer to the hot work may be required depending on the equipment, piping configuration and condition.

5.2.3 The area between the blind and the hot work shall be cleaned and gas free tested per the requirements in PR-5 Hot Work Policy.

Note: Gas testing should be done in close proximity to the hot work location. If bleeders are not available at the location, consideration should be given to drill a hole in the line, part flange, etc. in order to verify no hazards are present. This is especially important on long piping runs or complex systems.

5.3 Confined Space Blinding

5.3.1 Blinds shall be installed according to the Minimum Energy Isolation Requirements (Attachment A).

5.3.2 The isolation blind for a confined space must be tagged with a “Confined Space” tag (Appendix I) listing the Owning Department and blind number. This isolation point (blind, plug, physical separation, etc.) cannot be removed/reconnected until the approval for removal box has been signed by an Owning Department representative.

5.3.3 Vessel appendages (e.g. sight glasses, level bridles) must be properly decontaminated and if required, blinded/disconnected prior to entry. Alternative equally effective measures may be utilized in lieu of blinding and must be included on the Master Isolation and Blind Lists.

5.3.4 Blinds shall be installed at the closest flange to the confined space. Where this is not feasible, the following procedure shall be followed:

5.3.4.1 Operations and Maintenance must agree to the alternate location.

5.3.4.2 The piping between the vessel and the blind shall undergo the same preparation as the vessel (i.e. wash, steam, etc.).

5.3.4.3 Spacers must be installed on the vessel side of the blind, unless there is another means (bleeder) proximal to the blind which allows proper piping preparation and internal gas detection.

5.3.4.4 The permit writer shall check the opening of the piping at the blind with a gas detector.

5.3.4.5 The atmosphere must meet the same minimum requirements as the vessel prior to confined space entry permit being issued.

5.4 Bleeder Blind Guidelines

5.4.1 Where feasible, bleeder blinds should be used in situations where:

5.4.1.1 Bleeders are not present to properly air free the system, or

5.4.1.2 An isolation valve is known to be leaking and there is not a bleeder present between this isolation valve and the blind location.

5.4.2 Bleeder blinds should not be used in heavy product service or in other services that are prone to plugging.

5.4.3 Bleeder blinds shall be designed for applicable process conditions and consistent with ASME standards.

5.5 Permanent Blinds

5.5.1 Permanent blinds are typically installed in locations where it is critical to prevent leakage...
of material into undesired locations such as abandoned equipment or utility systems. Therefore, a system shall be in place to ensure proper management of the permanent blinds. The system shall include the following requirements:

5.5.1.1 The permanent blind shall be identified with a round red metal tag.

5.5.1.2 Blinds shall be shown on P&IDs and included on a permanent blind list so they can be verified in place after maintenance.

5.5.1.3 Permanent changes to the permanent blind list or P&IDs require an MOC.

5.5.1.4 A system to verify blinds are re-installed after maintenance.

5.5.1.4.1 For major maintenance this can be accomplished as part of the pre-startup checklist or part of an MOC.

5.5.1.4.2 For routine maintenance this can be accomplished using operating procedures/guidelines or other methods a refinery may implement.

5.5.1.5 Permanent blind installation shall be verified as often as necessary to ensure proper management of the program, but no less than once per year.

**Note:** The Operations group will own the permanent blind management program and ensure the permanent blind list is kept accurate.

### 5.6 Work Location Tags

5.6.1 The Owning Department will visually identify equipment to be worked including hanging of a Work Location Tag (Attachment M).

5.6.2 Work Location Tags will be installed at all locations which involve the installation of blinds or removal or spools for isolation.

5.6.3 The Owning Department must be present during initial equipment/line breaks.

5.6.4 The Servicing Group will return all tags to the Owning Department upon completion of work.

### 6.0 Energy Isolation Verification

6.1 Master Isolation Lists shall be walked down by Owning Department and Servicing Group representatives on the first day and night shift (if applicable), prior to working on equipment to verify that energy isolation is accurate and complete. Documentation of this verification will be the signatures on the Master Isolation List.

6.2 If isolation changes occur, the energy isolation points altered/changed shall be verified and walked down with Operations and the Servicing Group representatives before work is continued and on the first affected (day or night) shift following the change. Examples of changes that would require the isolation verification inspection to be repeated include:

6.2.1 Removing a lock to exercise a valve or breaker

6.2.2 Opening a lockbox

**Note:** Individual authorized employees must be provided the opportunity to verify isolation locations if requested.

### 7.0 Interim Test/Status Change of LOTO

7.1 An Interim Test shall be used when a piece of equipment that is being serviced under lockout/tag
7.2 Exceptions

7.2.1 Interim Test requirements do not apply to the hot alignment of pumps when the warm up lines are used and all other energy sources for the pump remain isolated.

7.2.2 An operating procedure may be used in lieu of the Interim Test form to document actions followed during the testing of equipment. The operating procedure must contain the following steps:

7.2.2.1 Prior to testing:
   - 7.2.2.1.1 Verify equipment is intact and non-essential items have been removed from the work area.
   - 7.2.2.1.2 Verify all workers have removed their lock and tag and are clear of the equipment.

7.2.2.2 After testing is complete and prior to allowing work to resume:
   - 7.2.2.2.1 Re-apply and verify proper energy isolation.
   - 7.2.2.2.2 Verify the equipment is adequately de-energized and de-pressurized.

7.2.3 The Owning Department shall ensure:

7.2.3.1 All affected employees are aware of the Interim Test and clear of the area.
7.2.3.2 All personal and servicing group locks/tags are removed from all of the applicable lockboxes.
7.2.3.3 Any item or equipment that could present a hazard during the re-energization is removed from the area.

7.2.4 The Owning Department Representative shall:

7.2.4.1 Complete a Status Change/Interim Test form (Attachment D) assign an Interim Test number and document the reason for the Interim Test on the Status Change/Interim Test Log.
   **Note:** The Status Change/Interim Test log shall be maintained with the Master isolation list.

7.2.4.2 Remove department locks, tags and keys from master lockbox.

7.2.4.3 Remove equipment isolation locks/tags from those devices necessary for re-energization.

7.2.4.4 Note the Interim Test number for each EID on the Master isolation list.

7.2.4.5 Sign and date the Equipment Safe for Interim Test section of the Status Change/Interim Test log to indicate re-energization is ready to commence.

7.2.4.6 After the Interim Test is complete, replace equipment isolation locks and tags after the energy isolation device(s) are returned to proper status.
   **Note:** If locks/tags are reused, the name/date on the tags does not need to be changed.

7.2.4.7 Test to verify that the equipment is isolated and de-energized according to the instructions in the “Verification of Isolation” section of the Master isolation list.

7.2.4.8 Lock Master Lockbox with Owning Department Silver lock and Equipment ID...
7.4.9 Sign and date the Isolation Restored section of the Status Change/Interim Test log.

7.2.5 After the Interim Test has been performed, the Owning Department and the Servicing Representatives shall:

7.2.5.1 Verify that equipment is isolated and de-energized.

7.2.5.2 Install required servicing group and personal locks and tags on the appropriate lockboxes.

7.3 A Status Change/Interim Test Log shall be used when an Energy Isolation Device must be inspected, repaired, removed, replaced, etc., and results in a change to the Master isolation list. The transferring of LOTO hardware from the Energy Isolation Device to the other Energy Isolation Device(s) must ensure the same integrity of the LOTO system is maintained.

7.3.1 An operating procedure may be used in lieu of the status change form to document actions followed during the reposition of LOTO. The operating procedure must contain the following steps:

7.3.1.1 Prior to testing:

7.3.1.1.1 Verify equipment is intact and non-essential items have been removed from the work area.

7.3.1.1.2 Verify all workers have removed their lock and tag from the lock box and are clear of the equipment.

7.3.1.2 After repositioning LOTO is complete and prior to allowing work to resume:

7.3.1.2.1 Re-apply and verify proper energy isolation.

7.3.1.2.2 Verify the equipment is adequately de-energized and de-pressured.

Important: A Status Change shall also be utilized to document the removal of a piece of equipment that is part of the isolation (i.e., removing a valve, closing a bleeder that was tagged open, etc.).

7.3.2 The Owning Department shall:

7.3.2.1 Identify isolation points required to maintain the integrity of the existing work scope.

7.3.2.2 Assign a Status Change number and document the Reason for Status Change on the Status Change/Interim Test Log (Attachment D).

7.3.2.3 Note the status change number for each EID on the Master isolation list.

7.3.2.4 Field verify that the status change is complete by ensuring that the Owning Department Supervisor or designee signs the Status Change Log indicating approval to proceed with implementation.

7.3.2.5 Complete the relocation of LOTO and note the Status Change number for each EID necessary for the relocation on the Master Isolation List.

7.3.2.6 Complete line preparation and de-energization to ensure safe condition of any additional lines and/or equipment included in the new LOTO system.

7.3.2.7 Sign and date the Status Change Complete section of the Status Change Log.

7.3.2.8 Remove LOTO equipment from the Energy Isolation Device that is now part of
the work scope.

7.3.2.9 Review the change with the Servicing Group Representatives associated with the job.

8.0 Plugs

8.1 Engineered Isolation Plugs

8.1.1 Equipment isolation by blinds, threaded caps/plugs and/or physically disconnected equipment is recommended over using an engineered isolation plug. The *Hot Work Isolation by Engineered Plug Approval Form* in Attachment F must be completed prior to utilizing an engineered isolation plug.

8.1.2 If a flanged connection is unavailable for blinding, an engineered isolation plug may be used in place of a blind for hot work.

8.1.3 An engineered plug may also be utilized when there is significant risk associated with the installation of the necessary blinds. An explanation for the risk / hazards of blinding shall be included on the *Hot Work Isolation by Engineered Plug Approval Form* in Attachment F.

8.1.4 In order to use engineered isolation plugs as the only isolation for Hot Work:

8.1.4.1 A Hot Work Isolation by Engineered Plug Approval Form in Attachment F shall be completed by Maintenance.

8.1.4.2 Engineered isolation plugs must have two seals and be designed and pressure rated for the potential pressure of the line. *Important:* The plug must also be applicable to the equipment service (e.g. liquid, vapor, corrosive, etc.).

*Note:* Single sealing, sewer/plumbers plugs shall not be used for hot work.

8.1.5 If a line cannot be made hydrocarbon free, the end of the line on which the hot work is to be performed shall be sealed with an Engineered Plug.

8.1.6 The following precautions shall be in place before hot work begins:

8.1.6.1 The open end must be made hydrocarbon free and scale must be removed.

8.1.6.2 The engineered isolation plug shall be installed outside of the heat-affected zone to ensure that the hot work will not burn or melt the sealing surface of the plug.

8.1.6.3 Provisions shall be made for the continuous venting of any accumulation of gases or vapors to a safe location away from the hot work.

*Note:* When it is deemed necessary to establish a purge through the engineered isolation plug, the vent line shall be safely vented to assure a flow is maintained. The method of venting the purge shall indicated on the *Hot Work Isolation by Engineered Plug Approval Form* in Attachment F.

8.1.7 If applicable, the Engineered Isolation Plug shall be equipped with a means to monitor and verify the sealing pressure to ensure maintenance of the 100% positive pressure vapor barrier. Also, a means to monitor the buildup of pressure behind the plug is required not to exceed the plug specifications.

8.1.8 A flammable gas test shall be made around the plug as part of the permit.

8.1.9 The location of the engineered isolation plug must be tagged with a blind tag and entered into the corresponding energy isolation and blind lists for the job.
8.1.10 The potential exists for engineered isolation plugs to be blown out of liners due to the buildup of pressure. Always work to one side of an inserted plug, never work in front of the plug.

8.1.11 Engineered isolation plugs used on lines containing flammable vapors shall not be left unattended past the end of the maintenance shift (work will continue until completed and the system is sealed or blinded).

8.2 Mechanical or Inflatable Sewer Plugs

8.2.1 The use of mechanical or inflatable plugs may be used for sewer isolation if they meet the following requirements:

8.2.1.1 Plugs are proper size and proper inflation rating for the application
8.2.1.2 Plugs are petrochemical resistant
8.2.1.3 Plugs are certified with current inspection by the manufacturer (i.e. expiration, visual defects, etc.)
8.2.1.4 Plugs will only be inflated inside of the pipe
8.2.1.5 Have accurate calibrated pressure gauges monitoring the pressure being used
8.2.1.6 Air line connections and hoses are not damaged and/or leaking
8.2.1.7 Plug will be positioned so that there are no sharp edges or protrusions that may damage it
8.2.1.8 The sewer line flow has been stopped or bypassed
8.2.1.9 The head pressure may never exceed the rated pressure of the plug
8.2.1.10 If head pressure will be present an anchor, support and or bracing shall be installed to secure the plug.

8.3 Isolation using Freeze Plug

8.3.1 In rare cases, a freeze plug may be used to isolate a section of piping but this is typically conducted as a last resort and requires in depth analysis, planning and preparation.

8.3.2 A procedure variance must be completed for any isolation utilizing a freeze plug. The variance must document why freezing the line was chosen over alternative solutions, the findings and recommendations from the hazard review and the precautions to safely complete the task.

8.3.3 The following factors must be satisfied prior to using a freeze plug:

8.3.3.1 There are no valves available to isolate the line or the isolation valves are not operating properly,
8.3.3.2 The line contains a freezable product (e.g., water, amine, heavy product),
8.3.3.3 The flow/velocity in the line is at an acceptable rate for freezing,
8.3.3.4 The line pressure and metallurgy allows for the use of a freeze plug,
8.3.3.5 Only cold work is allowed on lines containing hydrocarbons, and
8.3.3.6 Continuous monitoring of the line atmosphere and plug is required to ensure the plug remains in place and is performing as designed.

8.3.4 Reference TCR-ASI-G 20 Management of Temporary or In-Service Repairs for freeze plugs for additional guidance.
9.0 Miscellaneous Requirements

9.1 Alternate use of Locked Double Block and Bleed Valves

9.1.1 The use of locked double block and bleed valve alternatives in place of blinding equipment with a blank, slip plate, blind flange, threaded cap/plug and/or physical disconnect is only allowed in those situations listed in the Minimum Energy Isolation Requirements (see Attachment A) and for isolating opened ended lines if the following precautionary measures are taken to ensure continued isolation and to protect against developing a hazardous atmosphere:

9.1.1.1 Block valves are verified closed and tight.
9.1.1.2 Bleed valves and piping are verified open and clear.
9.1.1.3 Block valves are locked closed and the bleed valve is locked open.

9.2 Electrical LOTO Procedures for TAR’s

9.2.1 The refinery Electrical Department will work with the Owning Department to coordinate all work and energy isolation within substations.

9.2.2 The Owning Department will prepare unit equipment for maintenance and perform isolation and LOTO per normal procedures.

9.2.3 When the Electrical Department must isolate an MCC for electrical maintenance, the needed loads will be transferred to a temporary distribution source, the MCC main breaker will be placed in an electrically safe working condition and a LOTO will be installed.

Note: When temporary power is utilized, extreme caution must be exercised to ensure that electrical power is not being supplied to isolated equipment.

9.2.4 The Electrical Department will coordinate with the Owning Department to have all previously installed LOTO locks and tags removed from the MCC individual breakers and transferred to the lock box for the MCC main breaker. This will ensure that the energy source remains isolated at all times protecting the persons performing work in the field.

9.2.5 When the MCC is to be re-energized, the Owning Department shall remove any locks and tags on the lock box for the MCC main breaker and install their locks on the original equipment breaker for any work being performed in the field.

9.2.6 For situations where isolated equipment must be tested, positioned, temporarily operated, etc., the removal of locking devices and de-isolation must be managed via the “Interim Test” form and the task may be performed during shift change to minimize work disruptions.

9.3 Exclusive Control

9.3.1 The “Exclusive Control” exception to LOTO may only be applied to cord and plug electrical equipment. Examples include drill presses, saws, copiers, etc. that possess a cord and plug. The isolation of equipment by local switches, disconnects, valves, etc. is not considered “Exclusive Control” by OSHA.

9.4 Minor Servicing Activities

9.4.1 This procedure and OSHA Standard 1910.147 (The Control of Hazardous Energy – Lockout Tagout) does not apply to tasks classified as Minor Servicing Activities.

9.4.2 Tasks designated as Minor Servicing Activities (routine, repetitive, integral to the process) are listed in Section 13.0.

9.4.3 As required by OSHA 1910.147, alternative protective measures have been developed
for Minor Servicing Activities and included in Section 13.0.

9.4.4 Minor Servicing Activities must be attended at all times. If left unattended for any reason (breaks, lunch, relief, etc) LOTO must be applied.

9.5 Using a Relief Valve as an Energy Isolation Device (EID)

9.5.1 A relief valve may only be utilized as an EID for the purpose of inserting a blind.

9.5.1.1 A relief valve can be considered an EID to prevent backflow from the flare header for the purposes of installing or removing pre-decon blinds and installing or removing relief valve blinds.

9.5.1.2 Process operation must in a steady state and be monitored continuously during the installation of blinds to warn workers or any process upsets.

9.5.1.3 Respiratory protection and other required personal protective equipment (PPE) while installing/removing blinds shall be determined by atmospheric testing and analysis of the process equipment. Where monitoring near the flange cannot be conducted, blinds shall be installed using supplied air and bunker gear until the flare is isolated from equipment by blinds.

9.5.2 The relief valve shall be listed as an EID on the Master isolation list and must be tagged.

9.6 Lock Removal Process

9.6.1.1 If an individual or craft fails to remove a lock and leaves the workplace, the following procedures shall be followed (provided the lock requires removal).

9.6.1.1.1 The individuals Foreman, Coordinator, Area Team Leader, Manager or On-Call person shall verify that the individual or craft is not available to remove the lock.

9.6.1.2 The individual’s Foreman, Coordinator, Area Team Leader, Manager or On-Call person shall determine if the job is complete, if equipment is ready to return to service or if an Interim Test/Status Change needs to be performed and if the lock can be removed. The individual’s Foreman, Coordinator, Area Team Leader, Manager or On-Call personal shall complete Section B of the Lock Removal Report (see Attachment G) before physically cutting the lock from a lock box or energy isolation point and enter an Initial Incident Report in the electronic management system with the attached Lock Removal Report (see Attachment G).

9.6.1.3 The individual’s removed lock or craft lock shall be returned to the respective Foreman along with the completed Lock Removal Report (see Attachment G).

9.6.1.4 The individual whose personal lock was cut shall be informed of the incident before resuming work at the refinery (if applicable). This shall be affirmed by having the individual sign the Lock Removal Report (see Attachment G).

9.7 Energy Isolation of Radioactive Energy Source and/or Instrumentation

9.7.1 Proper applicability and scope are defined in the facility GBR-HESS-SM-01 Radiation Safety Management.

9.7.2 All personnel must contact the Radiation Safety Officer (RSO) or the Alternate RSO before manipulating a source housing (i.e. opening or closing a shutter) or entering a
9.7.3 The RSO must authorize work that requires any part of any part of an employee’s body to enter a restricted area.

9.7.4 Only the RSO’s or those who have received training may open or close source shutters.

9.7.5 When work requires employees to pass a body part in front of a source shutter, the shutter must be locked closed and tagged out by the RSO or other trained personnel.

9.7.6 When work must occur between an open shutter and the mounting vessel, employees must use tools with handles to prevent passing a body part through the beam path.

9.7.7 The RSO will provide energy isolation for the sources as required.

9.7.7.1 The RSO has a group of Gold locks they will use and the key will remain under the control for the RSO or other trained personnel. It will be included in the Master Isolation List (MIL).

9.7.7.2 An Orange operations isolation lock will be placed on the radiation source, in addition to the Gold RSO lock. The key to the orange lock will be placed in the Owning Department’s Master Isolation lock box and the lockbox number included on the MIL.

9.7.8 See GBR-HESS-SM-01 Radiation Safety Management for personnel monitoring requirements during work in restricted areas and while moving sources.

9.8 Abandoned In Place

9.8.1 Process Lines, Equipment and Electrical shall be blinded, plugged, disconnected or air gapped in accordance with PS 8.10 Policy Abandon in Place

10.0 Training

10.1 Training shall be provided to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The training shall include the following:

10.1.1 Each authorized employee shall receive training on the local LOTO standard, the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.

10.1.2 Each affected employee shall be instructed in the purpose and use of the energy control procedure and about the prohibition relating to attempts to restart or reenergize machines or equipment which are locked out or tagged out.

10.1.3 Contract companies performing work involving energy isolation must be trained and knowledgeable of the requirements of the OSHA Lockout/Tagout standard and the local LOTO standard.

10.1.4 Non-compliance with any portion of this procedure will be evaluated to determine violation(s) of a Life Critical Safety Rule (see RSP-1700-000) and RSW-000003-GB.
11.0 Audit Requirements

11.1 Apply the following requirements for inspections and audits:

11.1.1 Each site shall conduct inspections of their energy control procedure at least annually to ensure that the procedure and the requirements of this policy and the OSHA standard are being followed.

11.1.2 The audits must include a representative sampling (to be determined by the Safety Supervisor) of the various types of isolations (i.e., vessels, pumps, electrical, etc.), the site and its authorized employees.

11.1.3 The periodic audit shall be performed by an authorized employee other than the one(s) utilizing the energy control procedure being inspected.

11.1.4 The periodic audit shall be conducted to correct any deviations or inadequacies identified.

11.1.5 The periodic audit shall include a review, between the auditor and each authorized employee, of that employee’s responsibilities under the energy control procedure being inspected.

11.1.6 The employer shall certify that the periodic audits have been performed utilizing the Blinding and Energy Isolation Audit Form in Attachment K. The certification shall identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection, and the person performing the audit.

12.0 Alternative Group Lockout/Tagout Procedures

12.1 When complex equipment is being serviced or maintained, when there are many sources of energy, and/or when servicing/maintenance work extends over multiple shifts, OSHA permits employers to utilize an alternative procedure to each employee applying personal locks. Furthermore, OSHA recognizes the need to modify normal group energy control procedures to ensure the safety of employees performing servicing and maintenance on sophisticated and complex equipment.

12.2 The following factors shall be evaluated to determine whether the equipment being serviced or maintained is so complex as to necessitate a departure from the conventional group lockout/tagout procedures:

12.2.1 Physical size of the equipment

12.2.2 Number of employees performing the servicing/maintenance

12.2.3 Number of isolating devices to be locked/tagged out, and

12.2.4 Interrelationship of the components in the system of between different systems

12.3 The alternative system, comprised of the work permit, group lock and signature log, is an acceptable approach to personal locks, as long as the control and accountability procedures provide a level of protection equivalent to each individual authorized employee affixing their personal lock.

12.4 In order to achieve the same protection as that provided by the application of personal locks, the following elements must be in place in the alternative system to be considered similar to the normal master lock box and satellite lock box system.

12.4.1 Equipment owner performs shutdown, isolates equipment, verifies depressurization, applies equipment locks, and applies department lock to lockbox.

12.4.2 Owning department representatives review the job with the servicing and maintenance
crew(s) and ensures comprehension of the energy controls necessary to conduct the work safely.

12.4.3 Note: Actions taken in 12.4.1 and 12.4.2 above must be documented on the work permit.

12.4.4 A Principle Authorized Employee (PAE) may represent workers to verify equipment isolation and depressurization, but workers must be allowed to participate and must also be informed of their right to participate.

12.4.5 Following successful completion of the verification, the PAE will apply a group lock to the Master Lock Box and fill out the Principle Authorized Employee Form.

12.4.6 Each authorized employee must sign in on the PAE form at the time of arrival to the job and sign out at departure.

12.4.7 As the work is completed, the work permit and signature logs must be reconciled jointly by the PAE and the Owning Department Representative. This is required to ensure that all authorized employees who were assigned to the job are accounted for and verified to be clear from the equipment area.

12.4.8 The PAE form must be attached to the appropriate work permits so that the accountability of exposed employees is maintained.

12.4.9 Periodic audits must be conducted and documented to ensure the system remains effective.
### 13.0 Minor Servicing Activities

<table>
<thead>
<tr>
<th>Activity</th>
<th>Justification</th>
<th>Alternative Measures to LOTO</th>
</tr>
</thead>
</table>
| Replacing pressure gauge and servicing pressure transmitters | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine technician rounds to ensure equipment and process monitoring is available | • Verification that isolation valve is closed  
• Ensure not in line of fire |
| Light bulb replacement (bulbs not broken) | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine technician rounds to ensure safety and equipment/process monitoring | • Verification that power is off (switch, etc.)  
• Wear proper hand protection |
| Installing and removing utility hoses, fire water hoses and drain hoses/tubing. This includes small bore piping (valves, check valves and other fittings) that are required to connect utility hoses and drain hoses to the process. | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine operator rounds to ensure equipment and process monitoring is available and during equipment troubleshooting | • Verification that isolation valve is closed  
• Ensure not in line of fire  
• Reference RRD-1150-010 (Utility Connections to Process Lines & Vessels) |
| Removing plugs and caps from bleeder/valves | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated during routine operator rounds for equipment or process monitoring and during equipment troubleshooting | • Verify the isolation valve is closed  
• Ensure not in line of fire  
• Installing bleeder cleaners and conducting gauging actions - operating guidelines/ training documents shall be in place to define actions and safety provisions to be followed. |
| Installing and removing bleeder cleaner tools | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated during routine operator rounds for equipment or process monitoring and during equipment troubleshooting | • Verify the isolation valve is closed  
• Ensure not in line of fire  
• Installing bleeder cleaners and conducting gauging actions - operating guidelines/ training documents shall be in place to define actions and safety provisions to be followed. |
| Gauge catalyst hopper, salt drier, tank, etc. | • No potential for release of hazardous material  
• Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – activities are repeated during routine operator rounds or PM frequency, monitor process conditions or ensure integrity of system | -- |
| Removing blind flange to back flush a cooling water exchanger | • No potential for release of hazardous material  
• Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – activities are repeated during routine operator rounds or PM frequency, monitor process conditions or ensure integrity of system | -- |
| Remove coupon holder in cooling water circuit | • No potential for release of hazardous material  
• Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – activities are repeated during routine operator rounds or PM frequency, monitor process conditions or ensure integrity of system | -- |
| PM pH probes in cooling water circuits | • No potential for release of hazardous material  
• Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – activities are repeated during routine operator rounds or PM frequency, monitor process conditions or ensure integrity of system | -- |
### Activity

<table>
<thead>
<tr>
<th>Activity</th>
<th>Justification</th>
<th>Alternative Measures to LOTO</th>
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</table>
| Steam trap replacement and cold work steam tracing repairs (systems that can be isolated by two valves) | • Done during normal production (intended function of primary process un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis based on observations from routine operator rounds. Properly operating steam tracing is essential to operation of the process. | • Verify system is isolated and de-pressured  
• PPE requirements include typical Class D PPE  nitrile insulated gloves and a face shield |
| Connect hoses for caustic, acid and chemical deliveries                  | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis and is inherent for process operations | • Verify isolation valve(s) is isolated  
• Operating Procedures and/or guidelines shall be in place to adequately define actions and safety provisions to be followed. |
| Completing hose loops for product transfer                              | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine rounds to ensure process monitoring is available and during troubleshooting | • Verify isolation valve(s) is isolated  
• Operating Procedures and/or guidelines shall be in place to adequately define actions and safety provisions to be followed. |
| Blow down sight glass                                                    | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine rounds to ensure process monitoring is available and during troubleshooting | • Verify system is blocked in (if applicable)  
• Additional PPE will be utilized based on Invasive Work Risk Assessment Matrix, other form of hazard review, or other policy  
• Ensure not in line of fire |
| Steam out sight glass, control valve, etc.                              | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine rounds to ensure process monitoring is available and during troubleshooting | • Verification that isolation valves are closed  
• Additional PPE will be utilized based on Invasive Work Risk Assessment Matrix, other form of hazard review, or other policy  
• Required safety measures shall be documented on the work permit  
• Ensure not in line of fire |
| Blow down high and low side taps of flow cell                           | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine rounds to ensure process monitoring is available and during troubleshooting | • Verification that isolation valves are closed  
• Additional PPE will be utilized based on Invasive Work Risk Assessment Matrix, other form of hazard review, or other policy  
• Required safety measures shall be documented on the work permit  
• Ensure not in line of fire |
| Troubleshooting/servicing transmitters with a manifold between root valves & transmitter that allows for isolation | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine rounds to ensure process monitoring is available and during troubleshooting | • Verification that isolation valves are closed  
• Additional PPE will be utilized based on Invasive Work Risk Assessment Matrix, other form of hazard review, or other policy  
• Required safety measures shall be documented on the work permit  
• Ensure not in line of fire |
| Calibration and repair of equipment in analyzer buildings                | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine rounds to ensure process monitoring is available and during troubleshooting | • Verification that isolation valves are closed  
• Additional PPE will be utilized based on Invasive Work Risk Assessment Matrix, other form of hazard review, or other policy  
• Required safety measures shall be documented on the work permit  
• Ensure not in line of fire |
| Changing motor and blower air filters                                   | • Done during normal production (intended function of process equipment un-interrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis during routine operator rounds to maintain condition of equipment. | -- |
(Continued)

<table>
<thead>
<tr>
<th>Activity</th>
<th>Justification</th>
<th>Alternative Measures to LOTO</th>
</tr>
</thead>
</table>
| Blinding small bore fuel gas piping to process heaters | • Done during normal production (intended function of process equipment uninterrupted)  
• Routine, Repetitive and Integral – action is done based on observations from routine operator rounds to maintain equipment reliability. | • Verification of isolation  
• Guideline or training document shall be in place to adequately define actions and safety provisions that must be followed. |
| Repair/Cleaning of tips or replacement of flex hoses for burners or process heaters | • Done during normal production (intended function of process equipment uninterrupted)  
• Routine, Repetitive and Integral – action is done based on observations from routine operator rounds to maintain equipment reliability. | • Verification that isolation valves are closed  
• Additional PPE will be utilized based on Invasive Work Risk Assessment Matrix, other form of hazard review, or other policy  
• Required safety measures shall be documented on the work permit  
• Ensure not in line of fire |
| Perform troubleshooting or calibration of control valves by blocking in and disconnecting the supply air tubing | • Done during normal production (intended function of process equipment uninterrupted)  
• Routine, Repetitive and Integral – action is repeated on a regular basis to ensure equipment is available  
• No potential for release of hazardous material |
14.0 **Terms and Definitions**

14.1 **Affected Employee** - is an employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

14.2 **Authorized Employee** - is a person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee’s duties include performing servicing or maintenance.

14.3 **Bleeder Blind** - is a blind designed for the isolation of a piece of equipment and contains a bleeder valve for the purpose of hydro-testing, steaming, purging, de-pressuring, etc. while still maintaining the energy isolation. The two types of bleeder blinds used at MPC are Bleeder Blind Flanges and Pancake Bleeder Blinds.

14.4 **Bleeder Blind Flange** - is a bleeder blind where the pipe nipple and valve are added to the inside diameter of the bolt circle on a full pressure, stamped, rated blind flange. Bleeder blind flanges are fabricated of piping components following the applicable line specifications. Bleeder blind flanges may be used as a permanent piping component.

14.5 **Blind List** - is the standardized form used to document the location, size, installation and removal of isolation and test blinds. *(Also referred to as Isolation List)*

14.6 **Blinding** – is the absolute closure of a pipe, line or duct achieved by fastening a solid plate, threaded plug or cap across its bore to complete cover it. The cover must at least cover the outer edge of a flange’s mating surface and be capable of withstanding the maximum upstream system pressure, temperature and be chemically compatible.

14.6.1 **Blinds include**: blanks, slip plates, blind flanges, threaded caps, physical disconnects

14.7 **Cold Work** - is maintenance, repair, cleaning, or construction activity, not requiring the use of fire, hot surfaces, spark producing equipment, or electrical equipment that is not classified for use in the area.

14.7.1 **Examples**: Vibration monitoring, control valve tuning, valve packing adjustment.

14.8 **Confined Space Entry** - means the action by which any part of a person passes through an opening into a permit-required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant’s body breaks the plane of an opening into the space, whether or not such action is intentional or any work activities are actually performed in the space.

14.9 **Double Block and Bleed** - is the closure of a line, duct or pipe by closing and locking two (2) in-line valves and by opening and locking a drain or vent valve in the line between the two closed valves.

14.10 **Energy Isolating Device (EID)** – is a mechanical device that physically prevents the transmission or release of energy including but not limited to the following:

14.10.1 Manually operated electrical circuit breaker,

14.10.2 Disconnect switch,

14.10.3 Manually operated switch that the conductors of a circuit can be disconnected from all ungrounded supply conductors and no pole can be operated independently,

14.10.4 Line valve,

14.10.5 Block valve,
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.10.6</td>
<td>Blind or,</td>
</tr>
<tr>
<td>14.10.7</td>
<td>Any similar device used to block or isolate energy.</td>
</tr>
<tr>
<td>14.10.8</td>
<td><strong>Note:</strong> The following are not energy isolation devices: push buttons, selector switches, and other control circuit type devices.</td>
</tr>
<tr>
<td>14.11</td>
<td><strong>Master isolation list</strong> - is the standardized form used to document isolated energy sources (e.g., breakers, valves, and blinds), isolation verification points and the means used to verify the control of hazardous energy. <em>(Also referred to as Isolation List)</em></td>
</tr>
<tr>
<td>14.12</td>
<td><strong>Engineered Isolation Plug</strong> - is an engineered tool used to safely provide 100% positive pressure vapor barrier against residual contents in the pipe.</td>
</tr>
<tr>
<td>14.13</td>
<td><strong>Energy Source</strong> - Energy sources include things such as steam to turbines, air from compressors, electric switches, hydraulic or pneumatic power to pistons. Isolation of these energy sources is required and is just as important as isolating the electrical power.</td>
</tr>
<tr>
<td>14.14</td>
<td><strong>Equipment Isolation Locks</strong> - are locks assigned to the owning department for the purpose of isolating equipment. These locks will be placed on breakers, valves, etc. and only one key will operate each lock. Equipment isolation locks shall be standardized by color, shape or size.</td>
</tr>
<tr>
<td>14.15</td>
<td><strong>Exclusive Control</strong> - is work on cord and plug connected electric equipment for which exposure to the hazards of unexpected energization or startup of the equipment is controlled by the unplugging of the equipment from the energy source and by the plug being under the exclusive control of the employee performing the servicing or maintenance.</td>
</tr>
<tr>
<td>14.16</td>
<td><strong>Freeze Plug</strong> - is the practice of freezing a section of the contents of a line (pipe) to isolate equipment.</td>
</tr>
<tr>
<td>14.17</td>
<td><strong>Group Lock</strong> - is a lock applied to the Master Lockbox representing a servicing group.</td>
</tr>
<tr>
<td>14.18</td>
<td><strong>Hazardous Energy</strong> - is any energy, including mechanical, pneumatic, hydraulic, electrical, chemical, radiation, and thermal that could cause injury to workers.</td>
</tr>
<tr>
<td>14.19</td>
<td><strong>Hot Work</strong> - is repair, maintenance, or construction activity, which requires the use of spark-producing equipment or may create an ignition source.</td>
</tr>
<tr>
<td>14.20</td>
<td><strong>Invasive Work Risk Assessment</strong> - refers to a tool to be utilized to determine mitigation actions that should be taken when doing any invasive work. Once the invasive work task has been identified, use the tool to generate a numerical value for the categories of exposure concern, volume and impact. These values can then be multiplied to generate the Risk Assessment Score. This overall score is applied to the Mitigation Levels that include clear definition on the type of PPE, tools, protective actions and other mitigations that should be taken to complete the task.</td>
</tr>
<tr>
<td>14.21</td>
<td><strong>Isolation/De-isolation</strong> - is valve positioning, blinded, plugging, disconnecting, installing or removal that requires process hazard lockout by its owner.</td>
</tr>
<tr>
<td>14.22</td>
<td><strong>Isolation Blind</strong> – is a blind designed for the process isolation of a piece of equipment, vessel, piping, etc., during servicing or maintenance activities.</td>
</tr>
<tr>
<td>14.23</td>
<td><strong>Isolation Verification Point</strong> - is a device within an isolated system that is used to verify that hazardous energy is being controlled, but it is not part of the lockout/tag out for the system because it remains in its original state/position during the servicing of the equipment. Isolation verification points are recorded on the Master isolation list.</td>
</tr>
<tr>
<td>14.24</td>
<td><strong>Lockbox (Master)</strong> - is the lockbox into which all of the keys from the equipment isolation locks securing the machines or equipment are inserted and which would be secured by an Owning Department lock and Group Lock(s).</td>
</tr>
</tbody>
</table>
| 14.25 | **Lockout** – is the placement of a lockout device on an energy-isolating device to ensure that the energy-isolating device and the equipment it controls cannot be operated until the lockout device is
removed. Lockout devices use positive means such as locks, blank flanges and bolted slip blinds.

14.26 Minor Servicing Activities - which take place during normal production operations, are not covered by this policy if they are routine, repetitive, and integral to the use of the equipment for production, provided that the work is performed using alternative measures which provide effective protection.

14.27 Owning Department - is the department that normally owns and operates equipment, machinery and/or systems.

14.28 Pancake Bleeder Blind - is a bleeder blind where the pipe nipple and valve are on the outer circumference of the blind with the vent hole drilled perpendicular and horizontal to the vent port. This type of bleeder blind is intended to slip between two mating flange faces. Pancake bleeder blinds are temporary devices typically used for equipment preparation and maintenance activities. Pancake bleeder blinds shall not be used as permanent components in a piping system.

14.29 Perimeter (Battery Limit) Blind - is a blind placed at the perimeter of a unit or system that will provide isolation for the entire unit/system. Perimeter blinding will typically occur during turnarounds and will be required for hydrocarbons, toxics, corrosives, chemicals and nitrogen. Water, steam and air may need to remain in service within areas isolated by perimeter blinds.

14.30 Permanent Blind - is a blind that is in place during normal operations. This includes blinds on drain piping, utility connections, spec blinds normally rolled in the closed position, and decommissioned equipment. This does not include blind flanges.

14.31 Personal Lock - is a lock assigned to an employee that is individually identified and keyed. This lock will only be installed and removed by the assigned individual and shall remain in place while the individual is performing work on the isolated equipment. Personal locks will normally be applied to satellite lockboxes, but may also be applied to Master Lockboxes.

14.32 Ping & Ding - is a method used to check for loose bolts on flanges. A ball peen hammer is used to strike each bolt to look for movement and listen for a sound indicating the bolt is loose.

14.33 Primary Isolation Point (PIP) - is the point of isolation located immediately adjacent to the hazardous energy source.

14.34 Satellite Lockbox - is a secondary lockbox or lockboxes to which the keys to Group Locks are placed and each authorized employee affixes their personal lock.

14.35 Servicing Representatives - are the individuals working on the equipment/process. This may include operations, blending, shipping, maintenance, contractors, and salaried employees.

14.36 Status Change/Interim Test Form - is the form used to document the required steps for the temporary de-isolation of equipment for the purposes of testing, positioning, steaming, rinsing, purging, etc. and re-isolation prior to the authorized employees resuming work on the isolated equipment. This form is also used to document changes to the Master isolation list while the equipment / system is still isolated.

14.37 Supplemental Master isolation list - is the standardized form used to document additional isolated energy sources (e.g., breakers, valves, blinds) and/or isolation verification points that are not able to be included on the Master Master isolation list. This form is typically used during complex isolations.

14.38 Tagout - is the placement of a tagout device on an energy-isolating device to indicate that the energy-isolating device and the equipment it controls may not be operated until the tagout device is removed.

14.39 Test (Hydro-test) Blind - is a blind installed for the sole purpose of tightness testing of piping and/or equipment.
15.0 References

15.1 OSHA 1910 Subpart J Control of Hazardous Energy Sources (Lockout/Tagout)
15.6 OSHA 29 CFR 1910.333(b) - Electrical Safety Related Work Practices.
15.7 GBR-HESS-PR-03 Safe Work Permit Practice
15.8 GBR-HESS-PR-24 In-service Welding/Hot Tap Procedure
15.9 GBR-HESS-SM-01 Radiation Safety Management
15.10 TCR-ASI-G 20 Management of Temporary or In-Service Repairs
15.11 Marathon Petroleum Company LP, RSP1121-010 Blinding and Energy Isolation
15.12 Marathon Petroleum Company LP, RSP-1162 Electrical Safe Work Practices
15.13 Marathon Petroleum Company LLC HES Standard 310 Control of Hazardous Energy Sources (Lockout-Tag out)
15.14 GBR-HESS-PS-8.0 Mechanical Integrity Site Plan

16.0 Attachments

16.1 Attachment A – Minimum Energy Isolation Requirements
16.2 Attachment B – Master Isolation List Template
16.3 Attachment B1 – Supplemental Isolation List
16.4 Attachment C – Blind List Template
16.5 Attachment C1 – Supplemental Blind List
16.6 Attachment D – Status Change/Interim Test Form
16.7 Attachment E – Return to Service Checklist
16.8 Attachment F – Hot Work Isolation by Engineered Plug Form
16.9 Attachment G – Lock Removal Report
16.10 Attachment H - Principle Authorized Employee Form
16.11 Attachment I – Lock Color Guide
16.12 Attachment J – LOTO/Blind/Bleeder Tags
16.13 Attachment K – Blinding and Energy Isolation Audit Form
16.14 Attachment L – Line Breaking Flow Chart
16.15 Attachment M – Work Location Tag
17.0 Revision History

17.1 This procedure is subject to an annual review per corporate policy (HES Standard 310).

<table>
<thead>
<tr>
<th>Revision Number</th>
<th>Description of Change</th>
<th>Written by</th>
<th>Approved by</th>
<th>Revision Date</th>
<th>Effective Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>Original Issue. Consolidated site procedure replaces GBR-HESS-PR-14 and RSW-0002-TC and updated per Corporate RSP-1121-010 under MOC 50762.</td>
<td>M. G. Roache</td>
<td>D. C. Staats</td>
<td>8/1/2018</td>
<td>11/26/2018</td>
</tr>
</tbody>
</table>
### Attachment A – Minimum Energy Isolation Requirements

#### Minimum Energy Isolation Requirements

<table>
<thead>
<tr>
<th>STREAM TYPE:</th>
<th>CORROSIVES</th>
<th>HAZARDOUS WASTE</th>
<th>HIGH TEMP or PRESSURE UTILITIES</th>
<th>HYDROCARBON</th>
<th>TOXICS</th>
<th>NON-FIammable</th>
<th>UTILITIES</th>
<th>OTHER</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXAMPLES:</td>
<td>HF, SULFURIC SPENT OR FRESH CAUSTICS</td>
<td>API, DAF, WASTE WATER LIQUIDS &amp; SOLIDS</td>
<td>BOILER FEEDWATER, STEAM</td>
<td>HYDROGEN, FUEL GAS, FLUE GAS, LPG, LUBE OIL, NAPHTHA, CRUDE, SLURRY, ETC.</td>
<td>ANTIMONY, AMMONIA, HYDROGEN SULFIDE, AMINE, CHLORINE, BENZENE, NITROGEN</td>
<td>COOLING WATER, FRESH GLYCOL</td>
<td>INSTRUMENT AIR, PLANT AIR, UTILITY WATER, FIREWATER</td>
<td>MISC. ADDITIVES</td>
</tr>
<tr>
<td>COLD WORK</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
</tr>
<tr>
<td>HOT WORK</td>
<td>BLIND</td>
<td>BLIND</td>
<td>LOCKOUT</td>
<td>BLIND</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
</tr>
<tr>
<td>CONFINED SPACE ENTRY</td>
<td>BLIND</td>
<td>BLIND</td>
<td>BLIND (1)</td>
<td>BLIND</td>
<td>BLIND</td>
<td>BLIND (1)</td>
<td>BLIND</td>
<td>BLIND</td>
</tr>
</tbody>
</table>

#### Minimum Energy Isolation Requirements

<table>
<thead>
<tr>
<th>ENERGY TYPE:</th>
<th>ELECTRICAL</th>
<th>RADIATION</th>
<th>MECHANICAL</th>
<th>HYDRAULIC</th>
<th>PNEUMATIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXAMPLES:</td>
<td>MOTOR CIRCUITS, BUSSES, BATTERY CIRCUITS, FEEDERS, CONTROL CIRCUITS, ETC.</td>
<td>Nuclear gauge, ETC.</td>
<td>FLYWHEELS, TROLLEYS, SPRING-TENSIONED EQUIPMENT, CLUTCHES, ELEVATED MACHINE MEMBERS, PUMP IMPELLERS, ETC.</td>
<td>FCCU SLIDE VALVE(S) CONTROL SYSTEM, HYDRAULIC MOTORS, OTHER HYDRAULIC SYSTEMS, ETC.</td>
<td>AIR DRIVEN ACTUATORS, ETC.</td>
</tr>
<tr>
<td>COLD WORK</td>
<td>LOCKOUT (2)</td>
<td>LOCKOUT OR SOURCE REMOVAL</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
<td>LOCKOUT</td>
</tr>
<tr>
<td>HOT WORK</td>
<td>LOCKOUT (2)</td>
<td>LOCKOUT OR SOURCE REMOVAL</td>
<td>LOCKOUT</td>
<td>BLIND(1)</td>
<td>BLIND(1)</td>
</tr>
<tr>
<td>CONFINED SPACE ENTRY</td>
<td>LOCKOUT</td>
<td>LOCKOUT OR SOURCE REMOVAL</td>
<td>LOCKOUT</td>
<td>BLIND(1)</td>
<td>BLIND(1)</td>
</tr>
</tbody>
</table>

**NOTE:**

1. Where (1) is located in the table, see Section 9.1 for additional information.
2. Where (2) is located in the table, there may be some utility streams and electrical installations which are not capable of, or configured for Lockout isolation. In the rare event Lockout isolation cannot be utilized for a particular utility stream then Tagout isolation methods may be used. For electrical situations that cannot be locked out, an additional measure of isolation must be implemented (e.g., removal of circuit element, removal of fuse, disconnect wire, opening a second disconnecting device).
3. Entry into the shroud area of cooling towers (e.g., for gear box repairs, motor PMs) does not require blinding. The water to the cell must be locked out and the fan must be locked out. Entry into an in service cooling tower is acceptable, if the following conditions are met:
   - Water to the cell is locked out,
   - Platforms and walkways are structurally sound, and
   - Appropriate PPE is utilized.
4. Blinds are not required to isolate fire water/water to flow test nozzles in towers/vessels with the approval signatures from the Ops/Products Control and Maintenance Supervisors. The remainder of the tower/vessel must be blinded for confined space entry. Following the completion of flow tests, blinds must be installed in the test nozzle locations.
5. Isolation requirements do not apply to gases utilized for inerting equipment and vessels.
6. Lockout/Tagout is acceptable for confined space entry above the roof on internal and external floating roof tanks.
Attachment B – Master Isolation List Template
Master Isolation List Template

Attachment B1 – Supplemental Isolation List
Supplemental Isolation List

Attachment C – Blind List Template
Blind List Template

Attachment C1 – Supplemental Blind List
Supplemental Blind List

Attachment D – Status Change/Interim Test Form
Status Change/Interim Test Form

Attachment E – Return to Service Checklist
Return to Service Checklist

Attachment F – Hot Work Isolation by Engineered Plug Form
Hot Work Isolation by Engineered Plug Form

Attachment G – Lock Removal Report
Lock Removal Report

Attachment H - Principle Authorized Employee Form
Principle Authorized Employee Form

Attachment K – Blinding and Energy Isolation Audit Form
Blinding and Energy Isolation Audit Form
## Galveston Bay Refinery Lock/Key Scheme

<table>
<thead>
<tr>
<th>Lock Name</th>
<th>Use/Purpose</th>
<th>Color</th>
<th>Keys</th>
<th>Key Holders</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Marathon Authorized Employee Personal lock</strong></td>
<td>Attached by individual authorized employees to lockbox corresponding to job individual is working on.</td>
<td>RED</td>
<td>Each lock keyed uniquely, only one key available.</td>
<td>Authorized employee</td>
</tr>
<tr>
<td><strong>Contractor Employee Personal Lock</strong></td>
<td>Attached by individual authorized employees to lockbox corresponding to job individual is working on.</td>
<td>Any Color Except Orange</td>
<td>Each lock keyed uniquely, only one key available.</td>
<td>Authorized employee</td>
</tr>
<tr>
<td><strong>Operations Isolation Locks</strong></td>
<td>Used by Operations Department to secure energy isolating devices in the off of blocked position.</td>
<td>ORANGE</td>
<td>Each lock keyed alike per lockbox key</td>
<td>Operations Lock Box</td>
</tr>
<tr>
<td><strong>Operations Lockbox Locks</strong></td>
<td>Used by Owning Department to prevent access to content of a lockbox. IS the &quot;first lock on and last lock off&quot;</td>
<td>Silver</td>
<td>Keyed alike by complex or unit.</td>
<td>Unit Supervision</td>
</tr>
<tr>
<td><strong>Maintenance Task Tracking lock</strong></td>
<td>Used by All GBR craft reps to indicate task tracking. These locks are engraved with the Craft Name (Machinist, Pipefi, I&amp;E)</td>
<td>BROWN</td>
<td>Keyed alike for all Craft Reps</td>
<td>All of Craft Reps</td>
</tr>
<tr>
<td><strong>Electrical Contractor Task Tracking Lock</strong></td>
<td>Used by Contractor Electrician to secure energy control in the off or blocked position</td>
<td>Yellow</td>
<td>Each Contractor may have a set of keyed uniquely or key alike locks that are different from other contractor’s locks</td>
<td>Contractors</td>
</tr>
<tr>
<td><strong>Radiation Isolation Lock</strong></td>
<td>Used by Radiation Safety Officer to secure radioactive energy sources</td>
<td>Gold</td>
<td>Safety Department controls the keys</td>
<td>Radiation Safety Officer (RSO)</td>
</tr>
<tr>
<td><strong>Contractor Company Identification Lock</strong></td>
<td>Attached by the Contractor Company Supervisor to lockbox corresponding to job the company is working on.</td>
<td>Any Color Except Orange</td>
<td>Keyed alike for all Craft Reps or each lock keyed uniquely</td>
<td>Contractor Supervisor</td>
</tr>
</tbody>
</table>

**Note:** Galveston Bay Refinery utilizes American Brand Locks for Energy Isolation
Attachment J – LOTO/Blind/Bleeder Tags

![Perimeter Blind Tag]

![Confined Space Blind Tag]

![Hot Work/Hydro Blind Tag]

![Isolation Blind Tag]
Attachment L – Line Breaking Flow Chart

1. Work site prepared in accordance with Blinding and Isolation policy
2. Does the line contain flammable gas?
   - Yes: All blinds on the flammable line, unless shut down and gas-free, require fresh air respiratory protection and bunker gear. Additional precautions may be required depending on specific circumstances.
   - No: Wear PPE as determined by Operating or Maintenance Department based on the contents of the line.
3. Part line to any pressure or liquid will be relieved away from you.
4. Flanged line?
   - Yes: Bolts need replaced?
     - Yes: Change out bolts
     - No: Part union cautiously, relieving pressure prior to completely parting line
   - No: Welded line?
     - Yes: Verify line depressurized
     - No: Change out bolts

CAUTION: If the employees/contractors entering the line feel that conditions have become hazardous, they should attempt to mitigate the situation if they are not in immediate danger. They must report to the Operating Department as soon as possible. The Operating and/or Maintenance Department must meet to decide if the job is safe to continue, how the problem can be corrected, and/or if other options are available.
Attachment M – Work Location Tag

Work Location Tag

EQUIPMENT ID [ ]
CONTAINMENT BREAK [ ]
SEE BACK

Blind #/Tie In Point#: ____________________________
Date/Shift: ____________________________
Equipment Description: ____________________________

Notes: ____________________________

BLIND LOCATION: [ ]
DISCONNECT: [ ]
OPERATOR PRESENCE REQUIRED: [ ]

The Work Crew Rep will return ALL tags to the Operations Rep upon completion of work or when the work permit expires.