

Authored By: Ben Weir	<b>Blanchard Refining Company LLC Galveston Bay Refinery</b>	Doc No.: RSW-000047-GB Rev No: 0
Doc Custodian: Safety Supervisor		Refinery Safe Work Procedure
Approved By: Von Meeks	<b>ADM-19 Photography and Video Recording</b>	
Date Approved: 8/26/2019	Next Review Date: 9/30/2024	Effective Date: 9/3/2019

## 1.0 Purpose

MPC regulates the usage of electronic recording equipment and devices used to capture images such as cameras, cell phones with camera abilities, Personal Data Assistants (PDA's) with camera abilities, video equipment and any other device capable of capturing or storing any type of image format of the MPC Galveston Bay Refinery, its assets, personnel or proprietary information.

## 2.0 Scope

This policy applies to the following:

- MPC employees (including interns)
- Non-MPC employees
- Visitors (government officials, vendors, customers, delivery and pick-up drivers, etc)

## 3.0 Procedure

### 3.1 General Requirements

The following are general rules and requirements that must be followed when using cameras or video recording devices at the MPC Galveston Bay Refinery.

- 3.1.1 Video recording (recording of moving images) is strictly forbidden and must be explicitly approved by the Security Day Operations Office or by the Community Relations Representative. This provision excludes the following:
- 3.1.1.1 Recording of images generated by leak detection equipment.
- 3.1.1.2 Video recording of reenactments and interviews conducted in the course of an incident investigation provided that
- 3.1.1.2.1 The interview is conducted within the confines of an office or conference room AND
- 3.1.1.2.2 The interview is conducted by personnel explicitly authorized by MPC to conduct incident investigations or interviews.
- 3.1.2 In order to expedite legal proceedings and regulatory requirements, the MPC Community Relations personnel provide photography and video recording services for the site and should be used for all photography and video needs, except for the exclusions below and noted in section 3.1.1.
- 3.1.2.1 Agents representing regulatory organizations may capture still images in accordance with this procedure.
- 3.1.2.2 Agents representing regulatory organizations shall be accompanied at all times by a MPC representative
- 3.1.3 Non-MPC employees and visitors are prohibited from bringing cameras or video recording equipment on site without proper authorization.
- 3.1.4 Use of any non-MPC cameras (including cell/mobile phones with camera abilities) must have a permanent or temporary camera pass issued to, maintained by, and in the

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possession of the photographer.

3.1.5 Personal cell phones and electronic devices equipped with camera and/or video recording capabilities may only be used in accordance with PR-8 Safe Use of Electronic Devices.

3.1.5.1 MPC proprietary employees may capture still photographs with a camera or cell phone (permit not required) while within an office/conference room, parking lot, or roadway normally open to traffic provided the camera/cell phone is exclusively owned or controlled by the same employee, e.g., use a personal cell phone to take a picture of meeting notes recorded on a whiteboard.

3.1.5.2 MPC proprietary employees may capture still photographs and/or videos within the refinery units/areas. This may be done with cameras or with company issued phones equipped with cameras provided all Safety rules are followed (see 3.3.2.). Additionally, the photographs/videos are to be used for MPC business only and are not to be shared outside of MPC unless approved by Security and HESS legal.

### 3.2 Camera Pass

3.2.1 Camera passes are issued by the Security Day Office located in the HESS Building Room 219. An example of the camera pass can be found in the Attachment A.

3.2.2 Prior to use of any non-MPC camera on site, the photographer must secure the appropriate camera pass. MPC employees do not require camera passes but shall follow hot work rules in areas where Safe Work Permits are required to use cameras (see 3.3.2.).

### 3.3 Camera Use

3.3.1 Prior to any photography or video recording with a non-MPC device, the Owning Department and the Security Day Office shall be notified of the location, date, and time the photographs and videotaping will be taken.

3.3.2 Photographs and videotaping shall be taken in compliance with the site PR-3 Safe Work Permitting Procedure, PR-2 Hot Work, and PR-Safe Use of Electronic Devices.

3.3.3 All photographs and videotaping by non-MPC employees shall be reviewed by the Owning Department for proprietary restrictions.

### 3.4 Unauthorized Use of Image Recording Devices

3.4.1 Certain company equipment and/or information of a technical or cost nature may be classified as MPC "Proprietary" or "Confidential". All images taken or recorded on MPC property relating to MPC business, personnel, or its assets, are considered company property.

3.4.2 Cameras, video equipment, cell phones equipped with recording devices and other types of image recording equipment found to have been used without proper authorization are subject to confiscation until the recorded data can be reviewed for classification.

3.4.3 Unauthorized photography or video recording by MPC employees on or within the Galveston Bay Refinery property is considered a serious matter and could lead to positive discipline up to and including termination.

3.4.4 Non-MPC employees and visitors found taking unauthorized photographs or video recordings will be subject to immediate removal from the MPC Galveston Bay Refinery.

3.4.5 Unauthorized photography or video recording of Galveston Bay Refinery property by

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anyone outside the property is considered to be suspicious activity and shall be reported immediately to MPC GBR Security.

3.4.6 In all cases of unauthorized photography or video recording, MPC GBR Security will initiate investigations and make the proper notifications to MPC management and local and federal law enforcement authorities.

3.4.7 Anyone found in violation of this procedure may be subject to civil and criminal penalties.

3.4.8 Security of the MPC Galveston Bay Refinery is federally regulated by the Department of Homeland Security, and the United States Coast Guard, 33 CFR § 105. Unauthorized photography is considered to be suspicious activity and is a violation of the site's Facility Security Plan.

### 3.5 Reporting

3.5.1 It is the duty of everyone employed at the MPC Galveston Bay Refinery to report policy violations and suspicious activity. To report violations of this policy as well as suspicious activity, contact the Security Operations Center at 409-945-1762 or Ext. 21765 for immediate security response.

## 4.0 Definitions

None

## 5.0 References

5.1 United States Coast Guard, 33 CFR § 105

5.2 MPC GBR Facility Security Plan

## 6.0 Attachments


6.1 Attachment A – Camera Pass

## 7.0 Revision History

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original Issue. Consolidated site procedure that replaces GBR-HESS-ADM-19 and RGD-S010-TC under MOC 64555 and updated to align with PR-8 under MOC 52401.	B. D. Weir	V, J, Meeks	9/3/2019	9/3/2019

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**Attachment A: Camera Pass**



**Galveston Bay refinery**  
**Camera Pass**

Unit or Area to be Photographed or Videotaped:  
\_\_\_\_\_

Dates Authorized to take photos or video: \_\_\_\_\_

GBR Representative: \_\_\_\_\_

Name of Photographer: \_\_\_\_\_

Company Represented: \_\_\_\_\_

Authorized by: \_\_\_\_\_

**Requirements:**

- Authorization must be obtained prior to the date camera is to be used.
- Camera Pass must be shown to the Security Officer on duty at point of entry and kept on photographer at all times.
- Unit Supervisor must be contacted prior to any photography in areas as Hot Work Permit may be required.
- A GBR representative must accompany the photographer at all times while taking photos or video.
- Copies of all video and photos must be approved by GBR representative prior to any release or use.