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Table of Contents

1.0	PURPOSE.....	3
2.0	SCOPE.....	3
3.0	PROCEDURE	3
3.1	<i>RESPONSIBILITIES.....</i>	3
3.1.1	Owning Department Supervision or Designee.....	3
3.1.2	Owning Department Personnel.....	3
3.1.3	Permit User Supervisor.....	4
3.1.4	MPC Contractor Coordinator.....	5
3.1.5	Entry Supervisor: See PR-2 Confined Space Entry	5
3.1.6	Work Permit Work Party (Permit Users).....	5
3.1.7	Safety Department.....	6
3.1.8	Training Department.....	6
3.2	<i>WORK PERMIT PROGRAM.....</i>	6
3.2.1	Safe Work Permit Program Objectives.....	6
3.3	<i>USE OF A WORK PERMIT.....</i>	7
3.3.1	Work Permit Requirements.....	7
3.3.2	Exceptions to Work Permit Requirements	8
3.3.3	The Galveston Bay Safe Work Permit.....	8
3.4	<i>GENERAL WORK PERMIT REQUIREMENTS.....</i>	9
3.4.1	Issuance of Work Permits.....	9
3.4.2	Adherence to Procedures	9
3.4.3	Work Permit Authorization Period	9
3.4.4	Management System.....	9
3.4.5	Work Permit Retention.....	9
3.4.6	The Owning Department.....	9
3.4.7	General Outlying Areas Requirements.....	10
3.4.8	Gas Checks for Outlying Areas.....	11
3.4.9	Work in Adjacent Areas	11
3.4.10	Work in Areas with Unclear Ownership	11
3.4.11	Scope Changes.....	11
3.4.12	Updating the Scope of a Permit	11
3.4.13	Crew Changes for Service Representatives.....	12
3.4.14	Owning Department Shift Change during an Open Work Permit.....	12
3.4.15	Work Permit Extension	12
3.4.16	Supervision Change of Service Representative(s).....	13
3.4.17	Job Status Notification	13
3.4.18	Work Completion Notification.....	13
3.4.19	Revoking and Reinstating Permits	13
3.4.20	Permitting Multiple Crafts/Companies on a Permit.....	14
3.4.21	Preparation of Equipment	14
3.4.22	Invasive Work Risk Assessment	15
3.4.23	Barricading.....	15
3.4.24	Work Permit Audits.....	16

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

3.5	<i>PREPARATION FOR PERMITTED WORK & JOINT JOB SITE VISITS</i>	16
3.5.1	Initiating the Safe Work Permit Process	16
3.5.2	Joint Job Site Visit Responsibilities	16
3.5.3	Blanket Work Permit.....	17
3.5.4	Mutual Understanding Required.....	18
3.5.5	Joint Job Site Visit Requirements.....	18
3.5.6	Typical Joint Job Site Visit Exceptions	18
3.6	<i>COMPLETING THE SAFE WORK PERMIT</i>	19
3.6.1	Items left blank on the Safe Work Permit shall be assumed to be not applicable to the job or task at hand. All efforts should be made by the Permit Writer and Permit User representative(s) to fill out every applicable line and section of the Safe Work Permit.	19
3.6.2	Follow the guidance listed below to complete the Safe Work Permit.....	19
3.6.3	Section I – Work Authorization.....	19
3.6.4	Job Information Section	20
3.6.5	Job Site Preparation	21
3.6.6	Personal Protective Equipment (PPE) & Related Requirements.....	21
3.6.7	Section II – Hot Work Section	22
3.6.8	Section III – Confined Space Precautions	22
3.6.9	The Confined Space Tracking Log.....	23
3.6.10	Section IV – Atmospheric Monitoring	23
3.6.11	Section V – Required Signatures	25
3.6.12	Section VI – Additional Signatures	25
3.6.13	Section VII – Return of Equipment/Work Area Job Completeness.....	26
3.6.14	Instructions to Complete the Work Permit (Top, Back of Permit)	27
3.6.15	Entrants Log.....	27
3.6.16	Entry Supervisor Sign On/Off.....	27
3.6.17	Attendant Sign On/Off.....	27
3.6.18	Debriefing Section	27
3.7	<i>DISPLAY AND HANDLING OF SAFE WORK PERMITS</i>	27
3.8	<i>JOB SAFETY ANALYSES (JSA)</i>	28
4.0	DEFINITIONS	29
5.0	REFERENCES	31
6.0	ATTACHMENTS	32
7.0	REVISION HISTORY	32
	Attachment A: Safe Work Permit	34
	Attachment B: Scope of Application for Safe Work Permit and Risk Assessment	35
	Attachment C: Area Ownership Map	39
	Attachment D: Invasive Work Risk Assessment Matrix (RAM)	39
	Attachment E: GBR Job Safety Analysis Form	39

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

1.0 PURPOSE

The purpose of this procedure is for Marathon's Galveston Bay Refinery to adopt and comply with the guidelines set forth in the Refining Standard Practice "Safe Work Permit" (RSP-1128-000).

2.0 SCOPE

This work permit program applies to all Galveston Bay Refining Division (GBR) employees, contractors, and visitors to ensure that all work conditions and equipment are safe, and will remain so while work is being performed, and must be followed to ensure compliance with all applicable standards and regulations.

3.0 PROCEDURE

3.1 RESPONSIBILITIES

3.1.1 Owing Department Supervision or Designee

- 3.1.1.1 Ensure that management processes are in place to carry out the appropriate functions of the work permit system.
- 3.1.1.2 Ensure that all persons within their areas of responsibility have received the appropriate work permit training.
- 3.1.1.3 Ensure that work permits are being filled out completely and correctly.
- 3.1.1.4 Ensure that equipment is properly prepared to turn over to maintenance.
- 3.1.1.5 Co-sign all initial confined space entry permits. The owning department supervision or designee may co-sign other daily high hazard entries into confined spaces at their discretion.
- 3.1.1.6 Co-sign all attended hot work permits on lines and/or equipment not established as gas free.
- 3.1.1.7 Ensure the completed/cancelled safe work permits and confined space entry permits are separated by type based on retention requirements.
- 3.1.1.8 Ensure participation by the permit writer with the permit users in the joint job site visit.
- 3.1.1.9 Perform weekly audits of live work permits and communicate findings back to responsible parties.

3.1.2 Owing Department Personnel

- 3.1.2.1 Ensure that the equipment for release to the servicing representative(s) and the environment surrounding the job are in a safe condition.
- 3.1.2.2 Inspect the Master Isolation List to ensure any needed isolations are accounted for and signed off as completed.
- 3.1.2.3 Participate in the joint job site visit, as required.
- 3.1.2.4 Ensure the correct issuance and cancellation of work permits in the area and/or equipment under their control.
 - 3.1.2.4.1 The owning department (permit writer) shall be responsible for completing these sections of the permit:
 - Permit Extension Until
 - Operator Relief Change Section

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- Additional Forms Section
- Emergency Contacts Section
- Joint Job Site Visit
- Job Site Preparation Section
- Hot Work Section
- Confined Space Precautions Section
- Atmospheric Monitoring Section

3.1.2.4.2 Both the owning department (permit writer) and the servicing group representatives share responsibility for completing these sections of the permit:

- Required Permits Section
- Exact Location
- Work Description
- Potential Hazards/Chemicals
- Unit Process Safety Overview Required
- Personal Protective Equipment (PPE) & Related Requirements Section
- Required Signatures Section
- Return of Equipment/Work Area – Job Completeness Section

3.1.2.5 Ensure that work proceeds safely within the terms of the work permit relevant to their assigned responsibilities.

3.1.2.6 Periodically (at least once per shift) visits permitted job site(s) and verifies work being performed in compliance with work permit requirements.

3.1.2.7 Ensure that the permit users fully understand the requirements of the work permit and take appropriate action, as necessary.

3.1.2.8 Conduct atmospheric testing at the job site area, as required.

3.1.2.9 Extend work permits.

3.1.2.10 Notify their supervisor with any questions or concerns regarding the job or the work permit.

3.1.2.11 Transfer responsibility for the work permit when there is a change in permit writers or shifts.

3.1.2.12 Cancel the work permit if the conditions of the permit are not being met by the work party or area/equipment conditions require a work stoppage. Notify supervision of all appropriate parties.

3.1.2.13 The owning department will be available for consultation during maintenance work. The owning department shall inform the servicing representative(s) of any changes in conditions which would affect the job, or any operating emergency.

3.1.3 Permit User Supervisor (MPC Maintenance Supervisor / Contractor Foreman or Designee) - *This person is directly in charge of the work party carrying out the specific tasks.*

3.1.3.1 Ensures that the joint job site visit has been performed, as required.

3.1.3.2 Ensure participation by the permit users with the permit writer in the joint job site visit.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 3.1.3.3 Ensures that all work carried out by personnel under their control is covered by a valid work permit, when required.
- 3.1.3.4 Ensures that work proceeds safely within the terms of the work permit.
- 3.1.3.5 Ensures the permit users fully understand the requirements of the work permit.
- 3.1.3.6 Understands the limitations and restrictions of the work permit in order that the work may proceed safely.
- 3.1.3.7 Prior to performing work, ensures that all members of the work party adhere to all safe working practices and are fully familiar with the limitations/restrictions described on the work permit.
- 3.1.3.8 Ensures that all precautions specified on the work permit are complied with.
- 3.1.3.9 Ensures that the owning department is made aware of any changes in work conditions, work content or work scope.
- 3.1.3.10 Ensures that the work described in the work permit is completed or left in a safe condition if not completed.
- 3.1.3.11 Ensures that all permit users complete any required training in a timely fashion.
- 3.1.4 MPC Contractor Coordinator
 - 3.1.4.1 Ensures participation by the permit writer & permit users in the joint jobsite visit.
 - 3.1.4.2 Ensures that contractors comply with all MPCs' refinery safety rules and have the proper equipment as required by the Safe Work Permit.
 - 3.1.4.3 Provides a constant liaison between contractors and MPC personnel.
 - 3.1.4.4 Ensure that all members of the work party adhere to all safe working practices and are fully familiar with the limitations/restrictions described on the work permit.
 - 3.1.4.5 Issues work permits and performs gas testing for groups they are responsible for in maintenance owned areas (see E-Plot).
 - 3.1.4.6 Completes any required Safe Work Permit training in a timely fashion.
- 3.1.5 Entry Supervisor: See PR-2 Confined Space Entry
- 3.1.6 Work Permit Work Party (Permit Users)
 - 3.1.6.1 Participate in the joint job site visit, as required.
 - 3.1.6.2 Assist in proper completion of the Safe Work Permit where required:
 - 3.1.6.2.1 The Permit User shall be responsible for completing these sections of the permit:
 - Date
 - Time Issued
 - Time Expires
 - Work Order No.
 - Authorized Company/Contractor and Crafts
 - Unit Process Safety Overview Required

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- Corresponding attachments
- Confined Space Sign In/Sign-Out for Authorized Entrants Section
- Fire Watch, Bottle Watch, and Confined Space Attendant Section
- Servicing Representative Debriefing Notes

3.1.6.2.2 Both the permit user and permit writer shall share responsibility for completing these sections of the permit:

- Required Permits Section
- Exact Location
- Work Description
- Potential Hazards/Chemicals
- Personal Protective Equipment (PPE) & Related Requirements Section
- Required Signatures Section
- Return of Equipment/Work Area – Job Completeness Section

3.1.6.3 Ensure that work proceeds safely within the terms of the work permit.

3.1.6.4 Notify their supervisors of any changes on the job site or required changes to the work scope.

3.1.6.5 Read and understand the work permit and sign off the permitted job.

3.1.6.6 Complete all Safe Work Permit required training in a timely fashion.

3.1.7 Safety Department

3.1.7.1 Serves as a subject matter expert on the Safe Work Permit form and procedure. Provide guidance to permit users and writers when needed.

3.1.7.2 Co-signs all initial confined space entry permits. The Safety Department at their discretion, may co-sign daily, other high hazard entries into confined spaces.

3.1.7.3 Periodically audits job sites to determine compliance with the work permit. Corrects unacceptable conditions immediately and provides feedback, both positive and negative, to the Owning Department and User Departments/representatives.

3.1.8 Training Department

3.1.8.1 Schedules permit training for required participants and maintains records of the training provided.

3.1.8.2 Provides training materials that have been prepared in conjunction with the Safety Department that adequately prepares Permit Writers and users to be compliant with the Safe Work Permit process.

3.2 WORK PERMIT PROGRAM

3.2.1 Safe Work Permit Program Objectives

3.2.1.1 In general, this work permit program shall accomplish the following:

3.2.1.1.1 To verify, in writing, that proper safeguards and precautions have been taken to minimize the possibility of personnel injury and property damage during maintenance, repair, or construction

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

activities including but not limited to cold work, hot tap/stopple, vehicle entry, hot work, and confined space entry operations.

- 3.2.1.1.2 To inform owning department personnel of every maintenance, repair or construction activity being performed in their area(s) and/or on their equipment, so that proper safeguards can be taken to protect people and facilities from possible hazardous situations and when this work has been properly completed.
- 3.2.1.1.3 To inform owning department personnel when maintenance, repair or construction activity in their area(s) and/or on their equipment have been properly completed.
- 3.2.1.1.4 To inform maintenance and contractor personnel of the proper safeguards necessary for their activity.
- 3.2.1.1.5 To define specific requirements and procedures for each use of the work permit.

3.3 USE OF A WORK PERMIT

3.3.1 Work Permit Requirements

- 3.3.1.1 A Safe Work Permit is required for any maintenance, repair or construction activities such as cold work, vehicle entry, hot tap/stopple, hot work or confined space entry, on equipment within areas owned or operated by the Operations, Maintenance (e.g. electrical substations), third party contractors, and the Safety Department.
- 3.3.1.2 Third party contractors conducting work on their own right of way and/or on their own equipment will utilize their proprietary permitting process unless tying into MPC process/utility equipment.
 - 3.3.1.2.1 Third party contractors shall communicate work scope to the Owing Department Supervisor prior to commencing work. The Owing Department Supervisor shall also be responsible for reviewing the 3rd party contractor work scope prior to work commencing.
 - 3.3.1.2.2 MPC Maintenance Supervision shall review all 3rd party contractor work plans involving excavations, lifting over live equipment, or working near overhead electrical lines within the refinery fence line and help coordinate appropriate mitigative measures, so that proper risk mitigation is communicated to all parties and safety requirements are adhered to.
 - 3.3.1.2.3 In the event a 3rd party arrives at the gate and the owning department has not been notified the MPC Shift Director shall be notified at (409) 945-1882 (office) or (409) 655-7611 (cell).
 - 3.3.1.2.4 The shift director shall ensure that the owning department supervision is notified.
- 3.3.1.3 Vehicle Entry
 - 3.3.1.3.1 In order for the owning departments to provide authorization for vehicle entry without a specific safe work permit, the owning department must complete a hot work permit for the roadways in complexes (roads not normally open to traffic) and tank farm diked areas.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 3.3.1.3.1.1 One permit may include all roadways in a complex; however, gas checks must be completed on all roadways.
- 3.3.1.3.1.2 The owning department must ensure the gas checks are up to date before authorizing entry.
- 3.3.1.3.1.3 Both copies of the permit may be posted in the control room/shelter/permitting shack.
- 3.3.1.3.1.4 The permit writer and permit user representative on the permit may not be the same person.
- 3.3.1.3.2 For the purpose of ensuring that all work is adequately assessed and that all necessary precautions are in place, all work on GBR property, excluding the exceptions below, will require a Safe Work Permit. See Attachment B for Scope of Application for Safe Work Permit and Risk Assessment.
- 3.3.2 Exceptions to Work Permit Requirements
 - 3.3.2.1 Exceptions to work requiring a Safe Work Permit may include, but are not limited to:
 - Products Control or Operations Field Equipment Operator maintenance and preventative maintenance activities as defined by site agreements
 - routine cold work or hot work jobs or tasks done at maintenance shops by maintenance personnel
 - drivers only requiring permission to drop off/pick up
 - routine powered vehicle use on roadways normally open to traffic
 - routine walk throughs/inspections/audits
 - analyzer PM
 - office housekeeping
 - work in/on buildings that would not require the use of a ladder, power tools or the penetration of a surface
 - Equipment (i.e. fork lift, drott, pickup, etc.) making deliveries/pick up ISBL or in tank dikes escorted 100% of the time by the Owing Department with an atmospheric monitor. Equipment remaining ISBL as part of work will require a work permit.
 - Chemical truck loading and unloading performed in accordance with operating procedure, [ROP-REFY-7000-GB GBR Chemical and Bulk Delivery Transfer Procedure](#).
 - 3.3.2.2 Any hot work or confined space entry work performed by the owning department must be properly permitted as described in this procedure by another member of the owning department.
 - 3.3.2.3 See vehicle entry definition for those areas *not* requiring a Safe Work Permit.
 - 3.3.2.4 Any questions on work that may require a work permit should be forwarded to the appropriate owning department and/or safety.
 - 3.3.2.5 See Attachment B for Scope of Application for Safe Work Permit and Risk Assessment for details.
- 3.3.3 The Galveston Bay Safe Work Permit
 - 3.3.3.1 A copy of the approved Galveston Bay Refinery Safe Work Permit is located in Attachment A. This permit closely resembles the example permit found in

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

RSP-1128-000 "Work Permit" and is to be used for all covered work.

- 3.3.3.2 Minor modifications may be made to the permit to account for local vernacular and other requirements, though modifications must be reviewed and approved by the Corporate Manager, Refining Safety and Security.

3.4 GENERAL WORK PERMIT REQUIREMENTS

These instructions cannot be expected to cover all possible conditions or unanticipated situations. Should there arise any doubt in the mind of anyone authorized to sign or countersign safe work permits, as to whether conditions are safe, he/she should withhold from issuing the permit and consult with the proper owning department supervisor/foreman, safety representative or department manager.

3.4.1 Issuance of Work Permits

- 3.4.1.1 All work permits must be issued in accordance with instructions contained in this and all applicable procedures before the performance of any type of activity in the applicable areas.
- 3.4.1.2 Work permits shall not be issued for any work requiring Management of Change (MOC) until the MOC has been approved to execute.
- 3.4.1.3 Work permits may only be issued for work that is intended to begin immediately.

3.4.2 Adherence to Procedures

- 3.4.2.1 The procedures must be strictly adhered to. A variance must be written and approved in accordance with ADM-6 Safety Exception and Variance Procedure for any deviation from this procedure.

3.4.3 Work Permit Authorization Period

- 3.4.3.1 An initial work permit is only valid for a period of up to 12 hours (or lesser time as indicated on the permit) and can only be extended for a period of 12 hours immediately after the initial 12 hours.

3.4.4 Management System

- 3.4.4.1 Permits will be audited routinely by the Safety Department and Owner Department Supervision for compliance with this policy. Deficiencies noted in these audits will be corrected in a timely fashion.

3.4.5 Work Permit Retention

- 3.4.5.1 Issued work permits shall not be discarded. Instead, issued work permits shall be collected by the owning department, separated by type (SWP vs. CSE), and submitted to the Safety Department in an organized and timely fashion.
- 3.4.5.2 Work Permits must be retained for 84 months (7 years). Work Permits for confined space entry must be retained for 30 years.

3.4.6 The Owing Department

- 3.4.6.1 Owners of certain equipment, units, buildings, property, etc. will be responsible for issuing and canceling Safe Work Permits.
- 3.4.6.2 All owning department personnel who will be writing permits must receive Life Critical Safety Work Permit training prior to being authorized to write permits.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 3.4.6.3 Areas that lay outside of process units or tank dikes, termed *outlying areas*, have been assigned ownership. Refer to Attachment C - GBR Area Ownership Map for the assigned area owners.
- 3.4.6.4 All Electrical Substation and Load Center Activities up to the Main Breaker will be permitted by the E.I.G Group. All activities downstream of the main breaker will be permitted by the process unit, building, and/or area it's located in. (other than Electrical Substations and Load Centers owned by E.I.G.). Marathon E.I.G. Electrical Supervisors, Foreman, Electrical Advisors, and trained E.I.G. employees will be the permit writer's.
- 3.4.6.5 Electrical Substations assigned to Electrical Department:
- WPSS – Electrical Department
 - EPSS – Electrical Department
 - Power #4 138kv Substation – Electrical Department
 - PDC-100 Substation – Electrical Department
 - PDC-200 Substation – Electrical Department
 - SHGP Substation – Electrical Department
 - Switch House #1 – Electrical Department
 - Switch House #2 – Electrical Department
 - Switch House #3 – Electrical Department
 - Load Center #11 – Electrical Department
 - Load Center #39 – Electrical Department
 - FCCU #3 138kv Transformer Yard – Electrical Department
- 3.4.6.6 For East/West Plant, all analyzer buildings will be permitted by I&E Department, after notification to the affect process unit, building, and/or area has been complete. Marathon I&E Electrical Supervisors, Foreman, Electrical Specialists and I&E trained Instrument employees will be the permit writers. The Bay Plant Analyzer Group is the Owing Department for all analyzers and substations that do not control a process including the 5-Topper Entec Heater, Sulfur Unit CEMS, the Scrubber, Cooling Water Tower #8, Cooling Water Tower #7, and the Boiler House.
- 3.4.6.7 East/West Plant lift stations will be permitted by Environmental Facility unless otherwise agreed upon by the affected process unit, building, and or/area.
- 3.4.6.8 The owning department shall be available for consultation during work. The owning department shall inform the servicing representative(s) of any changes in conditions, or activities which would affect the job, or any operating emergency.
- 3.4.7 General Outlying Areas Requirements
- 3.4.7.1 The [Galveston Bay Refinery](#) link to E-Plot defines all areas of responsibility for permitting for outlying areas and operating complexes.
- 3.4.7.2 Employees working under a safe work permit may not be self-permitted. Another person not working on the job must act as the permit writer.
- 3.4.7.3 Work in buildings may be permitted by the building owner or GBR Facilities &

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

Services.

- 3.4.7.4 Outlying areas located adjacent to operating units must notify the owning unit's Shift Foreman of the work to occur.
- 3.4.7.5 Work must be stopped in outlying areas and permits pulled for refinery upsets or operational issues.
- 3.4.8 Gas Checks for Outlying Areas
 - 3.4.8.1 Hot Work being performed in outlying areas must be in compliance with [PR-2 Hot Work](#) and [Attachment B](#).
 - 3.4.8.2 Any confined space entries performed in outlying areas (including buildings in outlying areas) must be in compliance with [PR-1 Confined Space Entry](#).
 - 3.4.8.3 Where needed, assistance may be sought for gas checks performed in outlying areas if the means is unavailable to perform these gas checks by the permit writer.
- 3.4.9 Work in Adjacent Areas
 - 3.4.9.1 In work locations where there is close proximity to tanks, equipment or lines under the jurisdiction of more than one complex, the person originating the permit shall contact all adjacent areas or complexes involved to determine that the projected work can be done safely.
- 3.4.10 Work in Areas with Unclear Ownership
 - 3.4.10.1 In the event jurisdiction over a line is not clear, such as part way between two areas, the line shall be considered the responsibility of the unit, or area from which the material flows.
 - 3.4.10.2 In cases where an area is involved, such as the Maintenance access between complexes, the responsibility shall rest with the department or unit requesting the work to be performed.
 - 3.4.10.3 Ownership of areas outside of process units and tank dikes is defined per Attachment C – GBR Area Ownership Map.
 - 3.4.10.4 Where work must occur in an Outlying Area with no clear owner, the nearest adjacent owners must make the determination as to who will issue the permits. If a conclusion cannot be determined, the Safety Department shall be consulted to assist in making the determination. If conclusion cannot be agreed upon by Safety Department and Owing Department Shift Foremen, it must be escalated to the Day Foreman and Area Team Leader for final decision.
- 3.4.11 Scope Changes
 - 3.4.11.1 If the scope of the work changes during the covered work permit period, the servicing representative(s) must stop work, and notify the owning department to verify the adequacy of equipment and site preparation for the change in work scope.
 - 3.4.11.2 If the Owing Department approves the change in the scope of work, then the work permit must be updated to reflect the scope change and any new requirements, or a new permit must be written to cover the new scope of work.
- 3.4.12 Updating the Scope of a Permit

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 3.4.12.1 All adjustments must be made on both copies of the permit.
- 3.4.12.2 Boxes or line items that were checked and are no longer applicable shall be crossed out and the updater's initials shall be written adjacent to the line. Add wording to locations, companies/crafts, work descriptions, etc. as needed.
- 3.4.12.3 If significant updates or changes must be made or if the permit becomes confusing or unclear, the original permit shall be closed out and a new permit shall be obtained before continuing with the job. An example of a significant change includes updating a hot work or confined space work permit to cold work only status.
- 3.4.13 Crew Changes for Service Representatives
 - 3.4.13.1 If the servicing representative(s) crew changes any time during the permit period, the relief servicing representative(s) Supervisor/Crew Leader must contact the owning department to inform them of the change. If the Supervisor/Crew Leader changes, work must stop, and a new Joint Jobsite Visit must be conducted with the owning department.
 - 3.4.13.2 In either case, the service representative supervisor/crew leader must then review the work permit with the new personnel. If invasive, this discussion shall occur at the job site. See section 3.6.12.1.2 for additional requirements.
- 3.4.14 Owing Department Shift Change during an Open Work Permit
 - 3.4.14.1 If there is a shift change of the owning department personnel involved with the work, both copies of the work permit must be updated with the name/signature of the oncoming owning department person in Section I and the work permit shall be revalidated in Section V, if necessary.
 - 3.4.14.1.1 Operator Relief Section I only applies if the active Safe Work Permit is within the initial 12 hours of issue and the work crew is the same. If past the 12-hour initial issue, the permit will be revalidated in Section V for up to 24 hours from original issue.
 - 3.4.14.2 At shift change, the Permit Writer shall inform his or her relief personnel of any active work ongoing in their unit or area and discuss the permit requirements.
 - 3.4.14.3 Communication with the servicing representative(s) must be as thorough as when the original work permit was issued.
 - 3.4.14.4 Relief owning department representatives shall visit the job site of any open permits upon their first available opportunity. A determination as to the need for additional gas testing or a re-validation is required.
- 3.4.15 Work Permit Extension
 - 3.4.15.1 When no scope change will occur and the service group company(s) remains the same, the work permit may be extended for an additional shift under the follow conditions:
 - 3.4.15.1.1 The on-coming Owing Department must complete the start of shift gas test (if required by the permit) and record it on the field copy of the permit,
 - 3.4.15.1.2 All other requirements of the permit, specifically Joint Job Site Visit and JSA, must be completed prior to work beginning on the new shift.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

3.4.15.1.3 The on-coming representatives will then print and sign the work permit in the "Work Extension Signature" section of the work permit, as required by the signature matrix, on the field copy of the permit.

3.4.16 Supervision Change of Service Representative(s)

3.4.16.1 In the event there is a change in the supervision of the service representative(s) on the same shift the permit is issued, the work must stop, and a new Joint Jobsite visit must be conducted with the owning department and the new service representative(s) supervisor/crew leader.

3.4.16.2 The oncoming service representative supervisor/crew leader shall sign the field copy in Section VI as an acknowledgement and acceptance of the permit conditions.

3.4.17 Job Status Notification

3.4.17.1 The servicing representative(s) will verbally inform the owning department of the job status prior to the close out of each permit.

3.4.17.2 The servicing group must also inform the owning department of the schedule for completion when the work will not be completed on the current shift.

3.4.18 Work Completion Notification

3.4.18.1 The servicing representative(s) shall inform the owning department when the work is complete or of the job status when the work will not be completed on the current shift.

3.4.18.2 When requested by the owning department, the owning department and servicing representative(s) shall then visit the work site to review the completed work and work site cleanup. See Section VII of the Safe Work Permit.

3.4.18.3 Regardless of whether this visit occurs, Section VII, or the Return of Equipment/Work Area- Job Completeness Section, on the Safe Work Permit shall then be completed by both groups.

3.4.19 Revoking and Reinstating Permits

3.4.19.1 *Unexpected Hazards* - If a hazardous situation should develop during the course of work, the servicing representative(s) shall stop work immediately, summon assistance or correct the hazard, as appropriate, shut down any equipment being operated or other source of ignition, as appropriate, and if necessary, leave the area. All work permits in the affected area shall be revoked. Atmospheric monitoring must be conducted and a new permit written for permits that were revoked due to unexpected hazards occurring.

3.4.19.2 *Interruption by Operations* - When operating personnel find it necessary to open, unhead, or disconnect vessels or lines which are known or suspected of containing flammable or toxic liquids or vapors after a work permit has been issued, it is mandatory that all work permits in the affected area be temporarily recalled.

3.4.19.2.1 The recall is to assure that no work is being performed in the affected areas until it is determined that it is safe to return to work.

3.4.19.2.2 Additional gas tests are required prior to reissuing permits.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 3.4.19.3 *Interruption by MPC Maintenance or Contractors* - When work is interrupted or delayed for more than two hours, it is the responsibility of the servicing group employee in charge of the work to confirm any atmospheric or other permit conditions have not changed and/or return the permit to the owning department if the work has been discontinued or terminated.
- 3.4.19.4 *Lack of Permit Field Copy Display* – The Owing Department has the right to revoke permits and stop jobs if the permit field copies are not displayed as required in Section 3.5 of this procedure. This enables atmospheric monitoring updates to be recorded on the field copy of the permit.
- 3.4.20 Permitting Multiple Crafts/Companies on a Permit
- 3.4.20.1 Group permits are permitted under special circumstances but are not encouraged for most jobs. Group permits may be issued if the work to be performed is coordinated by the same person, all work scopes are recorded on the permit along with all responsible crafts, permit user representatives, and companies.
- 3.4.20.1.1 For CSEs, the intended personal protective equipment (PPE) must be similar as well to avoid causing additional hazards, except when engineering or administrative controls are used and pre-approved by the Safety Department (i.e. engineered ventilation system).
- 3.4.20.2 A group permit may be issued when the job is known to require more than one craft and the work is under the control of the same Servicing Department Supervisor.
- 3.4.20.3 Electricians performing lockout/tagout (LOTO) and rackout jobs can be included on group permits so long as the work scope includes that portion of the job.
- 3.4.21 Preparation of Equipment
- 3.4.21.1 Equipment shall be de-energized and isolated as according to standard operating procedures and guidance from PR-14 Energy Isolation.
- 3.4.21.2 Equipment shall be tagged with Work Location Tags (PR-14 section 5.6)
- 3.4.21.2.1 The Owing Department will visually identify equipment to be worked including hanging of a Work Location Tag (PR-14 Attachment M).
- 3.4.21.2.2 Work Location Tags will be installed at all locations which involve the installation of blinds or removal or spools for isolation.
- 3.4.21.2.3 The Owing department must be present during initial equipment/line breaks.
- 3.4.21.2.4 The Servicing Group will return all tags to the Owing Department upon completion of work
- 3.4.21.3 Equipment to be removed from operating units or tank farms for repairs, normally shall be cleaned and made gas free. The permit writer is responsible to see that the equipment is free of all hydrocarbons, harmful substances, and is so stated on the permit. The permit writer shall inspect any equipment opened before it leaves the unit or tank farm to determine if additional cleaning is required.
- 3.4.21.4 The Maintenance or Contractor Foreman responsible for the equipment

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

repairs shall inspect the equipment as it is further disassembled. These precautions are necessary to prevent an accident should hot work be performed on the equipment and to prevent work party members from coming into contact with corrosive or toxic chemical materials.

3.4.22 Invasive Work Risk Assessment

3.4.22.1 When permitting invasive work a risk assessment shall be undertaken to identify and mitigate the hazards found. The following requirements must be part of the risk assessment:

3.4.22.2 The Owinging Department **must**:

3.4.22.2.1 Safely control invasive work activities in their area.

3.4.22.2.2 Identify hazards and assess risks for invasive work using the risk assessment matrix (RAM) found in appendix #

3.4.22.2.3 Communicate all hazards and mitigations to the servicing group via the Joint Jobsite Visit (JJSV)

3.4.22.2.4 Document the RAM score on the Safe Work Permit.

3.4.22.3 The Servicing Group representatives **must**:

3.4.22.3.1 Verify that the invasive work has been risk ranked using RAM.

3.4.22.3.2 Use/ implement the proper level of mitigation indicated by the RAM score unless more stringent mitigations are required by a procedure/ guideline.

3.4.22.3.3 Stop the work if any invasive work conditions change and report them to the owinging department.

3.4.22.4 Notes:

3.4.22.4.1 The use of RAM does not supersede operation procedures or guidelines or safety procedures. If existing procedures are more restrictive, those requirements must be followed.

3.4.22.4.2 The use of RAM does not apply to work that is covered by RSP-1129-010 (HF Alky PPE).

3.4.22.4.3 Risk assessments are not required during turnarounds once the unit is perimeter blinded, de-pressured and decontaminated.

3.4.23 Barricading

The following requirements shall be followed for barricading invasive work where the equipment cannot be verified as de-energized:

3.4.23.1 The owinging department shall establish a perimeter barricade (exclusion zone) around the work site to protect personnel from exposure to hazardous materials and conditions during the initial line break.

3.4.23.1.1 For HF Alky services, the area inside the unit boundary shall be considered the minimum exclusion zone. Job location, volume, plume carry, etc. shall be considered to determine if the exclusion zone should be extended beyond the unit boundary.

3.4.23.1.1.1 For HF Alky services, the Owinging Department shift supervision (Day Foreman or Shift

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

Supervisor) and Maintenance supervision (supervisor or designee) must sign the work permit to designate their approval of the exclusion zone, as well as the other precautions being implemented.

3.4.23.1.1.2 It is not required to physically barricade the entire perimeter of the HF Alky unit as long as the impacted area is barricaded and all non-essential personnel are evacuated from the unit during the invasive work.

3.4.23.1.2 For services that have H₂S levels above the PEL or that are elevated in temperature (>140°), the perimeter barricade shall be established based on the impacted area (considering wind direction, gas test results, etc.) plus an additional 25 feet.

3.4.23.1.3 For all other services if gas test results show contaminant levels above the PEL/TLV limits in PPE-5 Respiratory Protection, the barricade (exclusion zone) shall be based on the gas test results and wind direction.

3.4.23.2 Only personnel in the proper level of PPE, as designated on the safe work permit, shall be allowed within the established perimeter barricade (exclusion zone).

3.4.23.3 The perimeter barricade shall be demarcated with RED Danger tape and barricade tags on all sides.

3.4.23.4 The owning department shall monitor the initial line break and adjust the perimeter barricade as necessary. The same level of PPE as required within the barricaded area shall be worn by the operator(s) conducting perimeter gas testing.

3.4.23.5 The requirements in this section are not required during turnarounds once the unit is verified to be perimeter blinded, de-pressured and decontaminated.

3.4.24 Work Permit Audits

3.4.24.1 The Safety Department will audit the Safe Work Permit Program at least annually to ensure that the program is either working as intended or should be modified to correct identified deficiencies.

3.5 PREPARATION FOR PERMITTED WORK & JOINT JOB SITE VISITS

3.5.1 Initiating the Safe Work Permit Process

3.5.1.1 A permit user representative or a member of the owning department shall initiate the permit process by obtaining a permit and filling in any known information of the Job Information Section of the permit. If done by a permit user representative, it should be submitted to the owning department for review and approval.

3.5.2 Joint Job Site Visit Responsibilities

3.5.2.1 Prior to beginning work, the permit user representative(s) will visit the permit writer to discuss the job scope and equipment preparation and assist in completion of the safe work permit.

3.5.2.2 The designated servicing representative(s) and owning department will

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

perform a joint job site visit where they visit the job site together to:

- discuss site specific permit requirements,
- to ensure mutual understanding of the job scope and
- to verify proper equipment preparation for planned work.

3.5.2.3 The permit user representative(s) will be required to review the identified items that reflect the job scope and the job surroundings, and work conditions on the Safe Work Permit. Many of the identified items are in blue, italicized font as seen on the Safe Work Permit.

3.5.3 Blanket Work Permit

3.5.3.1 A blanket work permit may be issued to servicing representatives to perform work in multiple locations when the following conditions are met:

3.5.3.1.1 The work remains under the responsibility of the operator that issued the original permit or a relieving operator.

3.5.3.1.2 The work scope is the same at all locations and does not change once the work permit is approved and issued.

3.5.3.1.3 The level of required personal protective equipment (PPE) and safeguards are the same for each work location.

3.5.3.1.4 A Joint Job Site Visit (JJSV) is conducted at each work location.

Note: "Ops Assist" is not an acceptable work description and is not allowed. The work description must be specific to a task and a joint job sight visit must be done.

Note: Work permits that specifically list or reference a list of multiple pieces of equipment or job locations are not considered blanket work permits. Some examples to clarify this include:

(1) "Repair of LDAR Leaks" would be considered a blanket permit. "Repair of LDAR leaks on valves at the top of Tank 55-5" would not be considered a blanket permit.

(2) "Pull and inspect relief valves" when perimeter blinds installed and unit is de-pressured and decontaminated, would be considered a blanket permit. "Pull and inspect PSV-3 and PSV-3B on the Cold Separator (69C-5)" would not be considered a blanket permit.

3.5.3.2 A blanket work permit may be used to permit maintenance work that will be executed using an approved Maintenance Procedure (e.g., SIS system testing).

3.5.3.3 The following are examples of invasive tasks that may be conducted under a blanket work permit:

Invasive Work when Perimeter Blinds Installed and Unit has been De-pressured and Decontaminated	Invasive Work in an Operating Unit
Removal/Installation of TI / Thermowells	Steam Trap Repair/Replacement
Removal/Installation of Control Valves	Steam Leak Repair
Removal/Installation of Orifice Plates	PM Flow/ DP Transmitters

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

Removal/Installation of Pressure Safety Valves (PSV)	PM ESD Testing
TAR Hot Bolting	

3.5.4 Mutual Understanding Required

3.5.4.1 The permit user(s) and permit writer must have a mutual understanding of the topics below to fulfill their responsibilities and to facilitate a safe work environment:

3.5.4.1.1 *Scope of Work* – Discussion about the scope of work must communicate information about the specific equipment involved and a description of the tasks to be performed.

3.5.4.1.2 *Preparation and Isolation of Equipment* – The degree of equipment preparation must match the scope of work planned. The permit writer will discuss the equipment to be worked on and the preparation of the equipment to be released with the permit user(s). This will be discussed at the joint job site visit unless [section 3.5.5](#) gives an exception. This is the owning department’s main contribution.

3.5.4.1.3 *Job Tasks & Execution Requirements* – The permit user(s) must ensure the permit writer has complete understanding of the job’s execution requirements during the joint job site visit. This will include discussion on:

- planned job steps for that shift,
- logistical arrangements required for job execution (e.g. crane placement, scaffold requirements),
- and special permit requirements.

3.5.5 Joint Job Site Visit Requirements

3.5.5.1 A permit user representative from each company or craft listed on the permit shall be present at the joint job site visit along with the permit writer. The joint job site visit shall be performed at the work location prior to the start of work.

3.5.5.2 The permit writer and permit user representative(s) must perform a joint job site visit for any invasive work every day unless one of the scenarios listed in [section 3.5.5](#) apply.

3.5.5.3 The permit user representative(s) is responsible for conveying all additional information covered during the JJSV to their respective work crew.

3.5.6 Typical Joint Job Site Visit Exceptions

3.5.6.1 If the permit user representative(s), permit writer, or other personnel request a joint job site visit, one shall be performed regardless of the exceptions listed below.

3.5.6.2 Scenarios that do not require a joint job site visit include:

Exceptions	Notes
Turnarounds or jobs lasting longer than one day	(1) An ongoing job, where personnel and the scope do not change from one permit period to the next, only requires a Joint Job Site Visit the first time the permit is issued. However, if personnel or scope change, another Joint Job Site Visit must be conducted. (2) As stated above, the Owing Department shall inform the servicing representative(s) of any

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

	changes in conditions or work scope which would affect the job, or any operating emergency. (3) Verification of de-energization (lock out/tag out (LOTO)) is required on the first day and night shift (if applicable), prior to working on equipment. This requirement can be met with a Joint Job Site Visit or handled as a specific task. Verification is also required if there are any changes in the isolated equipment. However, if personnel or scope change, another Joint Job Site Visit must be conducted.
Multiple Craft and Large Jobs	(1) For multiple craft jobs or large jobs where a single Joint Job Site Visit is not practical, multiple job site visits by each individual are not required. In this case, a representative from each MPC craft or contractor company involved in the job shall participate in the Joint Job Site Visit. It is the responsibility of these individuals to review the details discussed during the visit with their work crew. (2) A single MPC Maintenance designee can participate in the Joint Job Site Visit as a representative for the crafts or contractor crews. It will be the responsibility of this individual to review the details discussed during the visit with each of the various work crews. (3) Any individual has the right to ask the Owning Department for another Joint Job Site Visit if they do not feel comfortable that they have been adequately communicated the safety aspects of the job.
Walk through or monitoring only	This would potentially include vibration monitoring, volatile organic compound (VOC) monitoring, cold work, ultrasonic thickness monitoring, and a walk through to look a job over where no actual work is being done.
Mowing and weed control	—
General site cleanup	As long as it does not affect the operation of equipment.

3.5.6.3 Consult with appropriate foreman/supervisor and safety if there are questions on work that can or cannot be permitted as blanket cold work.

3.6 COMPLETING THE SAFE WORK PERMIT

3.6.1 Items left blank on the Safe Work Permit shall be assumed to be not applicable to the job or task at hand. All efforts should be made by the Permit Writer and Permit User representative(s) to fill out every applicable line and section of the Safe Work Permit.

3.6.2 Follow the guidance listed below to complete the Safe Work Permit.

3.6.3 Section I – Work Authorization

3.6.3.1 *Date:* Enter date the work is to be done.

3.6.3.2 *Time Issued:* Enter the time that the work is authorized to begin.

3.6.3.3 *Time Expires:* Enter the time at which the permit expires.

3.6.3.4 *Permit Extended Until:* Enter permit extensions in the applicable line. Also ensure that all required signatures per the Signature Matrix in the Work Extension Signature column of the Required Signatures section of the permit are added. A determination (i.e., hot work, confined space entry) as to the need for additional gas testing or a re-validation is required.

3.6.3.5 *Required Permits:* Identify applicable required permits such as hot work, cold work, confined space entry. A permit cannot be both hot work and cold work.

3.6.3.5.1 In open areas with hydrocarbon vapors present, the type of permit required will depend on the procedures, precautions taken and whether the tools and equipment utilized are capable of producing an ignition source. A judgment will need to be made by the owning department in each case with the following guidelines considered:

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- Cold work rules will apply if the work involved would not ordinarily create an ignition source.
- Hot work rules will apply if it can be expected (even remotely) that the work could produce a source of ignition.
- Additional safety precautions to the extent deemed necessary by the owning department, maintenance, or contractor, must be taken, depending on the individual task, hazards present, etc.
- If there is any doubt as to the safety of the job, the owning department, maintenance foreman, contractor coordinator or safety personnel should be consulted.

3.6.3.6 *Operator Relief Change:* The reliever provides name, signature and time of relief change as appropriate. Both copies of the permit must be signed with this information.

3.6.3.6.1 The operator may perform a relief change on an active Safe Work Permit without a permit extension if the permit is still within the 12-hour initial issue and the work crew is the same.

3.6.3.7 *Additional Forms:* Check the appropriate box(es) to identify additional forms that must be attached to the field copy of the permit. sections N/A box to indicate that this section is not applicable.

3.6.3.8 *Emergency Contacts:* Enter the Owing Department radio channel and other channel if applicable.

3.6.4 Job Information Section

3.6.4.1 *Exact Location:* Identify precisely where the permitted work is to be performed (i.e. unit area, equipment number, etc.)

3.6.4.1.1 For TAR's, vehicle and other portal powered equipment may be permitted as unattended hot work in defined zones on a respective unit. One safe work permit may be written for each zone, provided the following controls are in place:

3.6.4.1.1.1 All controls for unattended hot work will be in place as per Life Critical Safety procedures.

3.6.4.1.1.2 Each manned/operated piece of mobile equipment shall have a completed MPC JSA.

3.6.4.1.1.3 Zone permitting shall be implemented only after the unit battery limit blinds are in place and the unit is de-inventoried and gas free.

3.6.4.2 *Authorized Company/Contractor and Crafts:* Enter the name and craft of the company/contractor being given the authorization to perform the work. Indicate all applicable authorized crafts and companies in this section.

3.6.4.3 *Work Description (Purpose):* List the specific work description of the work being authorized by the permit. Include multiple crafts' and/or companies' work scopes as necessary.

3.6.4.4 *Joint Job Site Visit Complete:* Check to indicate that the joint job sit visit is completed. Also indicate whether or not the permit users must participate in a

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

post joint job site visit prior to closing out their permit. All blue, italicized lettered text items on permit must be considered prior to work. Most work requires a joint job site visit. See section 3.5.5 for the work scenarios that may not require a joint job site visit.

3.6.4.5 *Potential Hazards/Chemicals*: Identify all potential physical or chemical hazards that may be encountered as per the joint job site visit.

3.6.4.6 *Unit Process Safety Overview Required*: Process Safety Overview board will be reviewed prior to any work in process areas or the Joint Job Site visit. Bay Plant shall use the existing Process Safety Overview sheets until their Process Safety overview boards are installed.

3.6.5 Job Site Preparation

3.6.5.1 Check the appropriate boxes to indicate which preparatory actions have been taken to ensure that the equipment is ready for the work to be performed.

3.6.5.2 Write in what element(s) were used to purge equipment adjacent to the listing. List any neutralizing chemicals used to neutralize acids or bases above in the Potential Hazards/Chemicals section.

3.6.5.3 Indicate which lockout/tagout measures have taken place in preparation of the equipment. If no lockout/tagout measures were necessary for the job, indicate the Not Applicable box under this column header to show this. Also indicate if the equipment being directly worked on is not isolated.

3.6.5.4 *Job Safety Analysis (JSA) Handling*—Check the box to indicate that the JSA has been completed and ensure it is included with the field copy of the permit. .

3.6.5.5 For work within process units or tank farms, indicate the location of the nearest emergency eyewash and shower equipment. For work outside of process units or tank farms, consider supplying temporary emergency eyewash and safety shower equipment.

3.6.5.6 The Master Isolation List for the equipment must always indicate the current status of equipment isolation. The Master Isolation List should be referenced by the permit writer and permit user representative(s) to ensure proper isolation has been completed prior to issuing a permit. Refer to PR-14 Energy Isolation for more information on the Master Isolation List.

3.6.5.7 If a precaution is not listed on the permit, utilize the permit's "Other" lines to write in additional precautions or notes.

3.6.6 Personal Protective Equipment (PPE) & Related Requirements

3.6.6.1 Basic and additional PPE must be the requirements of [PPE-1 Personal Protective Equipment](#). Check the appropriate boxes in this section to indicate which types of additional PPE must be worn in order for the job to be performed safely.

3.6.6.2 List the type of glove and/or additional boots required for the job tasks.

3.6.6.3 Electricians and permit writers shall determine the proper class of electrical PPE as required by the electrical equipment's flash hazard analysis label. Refer to RSP-1162-000 Electrical Safe Work Practices for more information on the flash hazard analysis and electrical PPE.

3.6.6.4 For hazardous materials cleanup or other work, list the class of chemical

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

clothing required to be able to safely complete the tasks. Consult with the Safety Department if there are any questions about the proper requirements.

- 3.6.6.5 All servicing representative(s) must comply with respiratory requirements under PPE-05 and must provide their own respiratory equipment and have their personnel properly trained in its use. More information on respiratory protection can be found by accessing the PPE-05 Respiratory Protection.
- 3.6.6.6 Identify whether a bottle watch is needed for air-supplied respirator work. The bottle watch sign on/sign off shall be logged in the Fire Watch, Bottle Watch, and Confined Space Attendant Section on the back of the permit.
- 3.6.6.7 Utilize atmospheric monitoring results to determine the levels of respiratory protection required for any job. Indicate multiple cartridge respirators if required (i.e. Multi-gas AND particulate to protect user from both a hydrocarbon and dust or weld fume hazard). Direct any questions about respiratory requirements to the Safety Department.
- 3.6.7 Section II – Hot Work Section
- 3.6.7.1 This section is required for hot work jobs only. If the work scope entails no hot work, mark the N/A box to indicate this.
- 3.6.7.2 Check the appropriate box(es) to indicate type of hot work to be performed and the fire prevention requirements.
- 3.6.7.3 Each hot work permit must require adequate precautions that are specific for the job. Minimum requirements for any hot work permit include the identification of:
- the ignition source, or the source of the hot work,
 - whether or not a hot work attendant (or fire watch) is required for the tasks, and
 - a nearby means to extinguish a fire should one occur.
- 3.6.7.4 Precautions enlisted must be specific for the job, especially if the job is attended hot work. If the job is attended hot work, indicate the number of attendants (or fire watches) that are required for the job.
- 3.6.7.5 See definition of hot work for examples of attended and non-attended hot work.
- 3.6.7.6 When hot work is performed in a confined space utilizing cutting torches or inert gases, and the work is stopped and the space vacated for more than 15 minutes, the torches and hoses (oxygen, acetylene, propane, argon, etc.) must be removed or the hoses disconnected from the regulators.
- 3.6.7.7 Hot tapping and welding on lines or equipment under pressure or not gas-freed requires special approval per the requirements of GBR-HESS-PR-24 In-service Welding/Hot Tap Procedure.
- 3.6.7.8 Access [PR-2 Hot Work](#) for more information on hot work, associated requirements, definitions and responsibilities.
- 3.6.8 Section III – Confined Space Precautions
- 3.6.8.1 This section is required for jobs that include some sort of confined space entry. If this section is not applicable, check the N/A box in the header to indicate this.
- 3.6.8.2 Check the appropriate boxes to indicate precautions that must be taken to

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

ensure that confined space entry may be performed safely as per [PR-1 Confined Space Entry](#).

3.6.8.3 Each confined space job is unique and should require adequate precautions to be able to safely enter and perform the work at hand. The minimum requirements for confined space entries are listed for reference purposes in the Confined Space Precautions header and include:

- Rescue Team Available
- Air Siren/Radio
- Confined space attendant(s) with vest
- Continuous air monitoring device
- Confined space entry status signs
- Safety harness & lifeline (unless waived by the Safety Department for inhibiting personal safety during entry)

3.6.8.4 The above precautions must be indicated in the Confined Space Precautions section along with any additional precautions that are specific for that space. List the number of confined space attendants required to safely monitor the entrants in the confined space.

3.6.9 The Confined Space Tracking Log

3.6.9.1 The intent of the Safe Work Permit Confined Space Tracking Log, [PR-1 Confined Space Entry](#) Attachment G, is to track the date, conditions, and required precautions for each confined space initial entry in order to ensure these same requirements can be transferred to subsequent permits.

3.6.9.2 The Confined Space Tracking Log shall be filled out and signed by a member of the Safety Department for every confined space during the initial confined space entry approval process. The initial confined space entry permit number must be associated with the Tracking Log.

3.6.9.3 Once completed, the log shall be referenced by permit writers and all precautions listed on the Log shall be transferred over to the work permits for subsequent days of entry.

3.6.9.4 Precautions listed on the original log may be waived or updated by the Safety Department as the conditions of the confined space change. Any reduction of restrictions must be authorized and signed by the Safety Department and shall be documented on the tracking log.

3.6.9.5 Each log will be maintained by the owning department by log book or other means of retention and will remain in the area from which permits are issued.

3.6.9.6 Once the confined space has been closed up, the associated confined space tracking log shall be attached to the permit and turned in to Safety for proper document control and retention.

3.6.9.7 At the end of the year, any remaining confined space tracking logs shall be collected in December to be sent to the Safety Department for retention with December confined space permits.

3.6.10 Section IV – Atmospheric Monitoring

3.6.10.1 General Requirements

3.6.10.1.1 If this section is not applicable for the work at hand, the N/A box in the header of the section should be marked to indicate this.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 3.6.10.1.2 Prior to the use of any detection equipment, the users must ensure that the gas detection device is properly calibrated, bump tested for use that shift, and in good working condition.
- 3.6.10.1.3 Workers have the right to be present for initial testing if entry is being performed.
- 3.6.10.1.4 If required for the scope, gas testing will be conducted in as short a time as practical prior to the start of work. The gas test must be taken within two hours prior to the start of work.
- 3.6.10.1.5 When work is not started within two hours of the time the gas tests were taken, another test must be made with results shown and signed by the person making the second test.
- 3.6.10.2 Initial and Subsequent Gas Testing Requirements
 - 3.6.10.2.1 The information in [PR-1 Confined Space Entry](#) and [PPE-05 Respiratory Protection](#) may be useful in completing the atmospheric testing for the job.
 - 3.6.10.2.2 In all cases where there is a possibility of oxygen deficiency or of any vapors, gases, mists, fumes, pH or other hazardous substances being present, an appropriate atmospheric test must be made to determine if any harmful concentration levels exist in the work area.
 - 3.6.10.2.3 The testing must be completed prior to issuing the applicable work permit and the results communicated to all personnel involved via the work permit.
 - 3.6.10.2.4 Testing should be made in an area that provides a representative sample of employee exposure and/or reflects the condition of the equipment being worked on.
 - 3.6.10.2.5 Initial test results and the time taken shall be recorded in the appropriate column on both the soft copy and the field copy and initialed by the person making the test. Record the identification number and date of last calibration for the atmospheric monitoring device used for the test.
 - 3.6.10.2.6 Any additional atmospheric monitoring must be recorded on the field copy.
 - 3.6.10.2.7 Additional tests must be made at a minimum at mid-shift between the initial check and thereafter. Additional tests must be made more frequently if there is any reason to suspect that conditions may change.
 - 3.6.10.2.8 Always consider continuous atmospheric monitoring if it is suspected that conditions may change.
- 3.6.10.3 Atmospheric Monitoring and Hot Work Restrictions
 - 3.6.10.3.1 No hot work will be allowed if the LEL is greater than 10% LEL.
 - 3.6.10.3.2 If the concentration exceeds 0% LEL the permit writer must describe the source of the flammable vapors and the control strategy in the "Other Permit Requirements, Precautions, or Notes" section.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 3.6.10.3.3 The use of steam, nitrogen, CO₂ or other means of keeping the immediate work area out of the flammable range must be approved by the owning department.
- 3.6.10.4 Atmospheric Monitoring and Confined Space Hot Work Restrictions
 - 3.6.10.4.1 In confined spaces, hot work can only be performed if the LEL in and immediately around the confined space is 0%.
 - 3.6.10.4.2 Cold work confined space entry can still take place between 0-10% LEL, with additional precautions. See [PR-1 Confined Space Entry](#) and PPE-05 Respiratory Protection.
- 3.6.10.5 Continuous Atmospheric Monitoring Requirements
 - 3.6.10.5.1 Check the box indicating whether or not atmospheric testing must be continuous. Situations/scenarios that may require continuous monitoring include but are not limited to confined space entry, camera use, and instrument analyzer buildings that are backed up by nitrogen (plant air) at the Galveston Bay Refinery.
 - 3.6.10.5.2 The sampling point of the continuous atmospheric monitoring device must be representative of the entrant(s) breathing zone(s). The location of the continuous atmospheric monitoring device must be listed on the Safe Work Permit.
- 3.6.11 Section V – Required Signatures
 - 3.6.11.1 Obtain signatures from all applicable Responsible Persons as indicated in the Signature Matrix to validate the conditions specified on the permit. Refer to definitions in section 4.0 for descriptions of these Responsible Persons.
 - 3.6.11.2 Signatures for the permit user representative(s) and permit writer should only be recorded after the joint job site visit (if applicable) is completed. The permit writer shall be the last signature on the permit and shall signify the completion of the permit process.
- 3.6.12 Section VI – Additional Signatures
 - 3.6.12.1 Accounting For Personnel Working From the Permit
 - 3.6.12.1.1 For instances when there are multiple crafts, companies, or work crews working under the same permit, a permit user representative from each craft, company, or crew shall sign in this section verifying that permit conditions are understood and accepted.
 - 3.6.12.1.2 All maintenance, contractor, and other support personnel who have a need to enter a process unit, Oil Movements, OSBL Substations, Lab and the Docks must sign-in/out as required by [ADM-10 Process Unit Entry](#).
 - 3.6.12.2 Work Party Members Joining the Job in Progress
 - 3.6.12.2.1 A permit user representative is required to complete a JJSV with the Permit Writer prior to signing the work permit when joining a job in progress.
 - 3.6.12.2.2 Once the JJSV is completed the permit user representative will sign the field work permit verifying that permit conditions are

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

understood and accepted.

- 3.6.12.2.3 The permit user representative(s) is responsible for conveying all additional information covered during the JJSV to their respective work crew.

3.6.13 Section VII – Return of Equipment/Work Area Job Completeness

3.6.13.1 Communication Requirements for Job Close-Out

- 3.6.13.1.1 At the conclusion of the job or before the permitted time expires, the work party must contact the owning department and inform them of the status of the permitted work.
- 3.6.13.1.2 A post joint job site visit must be performed with the owning department at the job site prior to the close-out of the permit if this requirement is indicated in the Job Information section of the permit. Refer to [PPE-7 Fall Protection/Ladder](#) section on grating, decking, and floor removal for mandatory post joint job site visit requirements when creating a hole or penetration in a working surface.

3.6.13.2 Completing the Return of Equipment/Work Area Job Completeness Section

- 3.6.13.2.1 The field copy of the permit must be returned to the owning department and realigned with the soft copy of the permit to initiate the Return of Equipment/Work Area process.
- 3.6.13.2.2 The permit user representative(s) must indicate the status of the job, the removal of lockout/tagout devices, and whether site cleanup has been completed on the permit.
- 3.6.13.2.3 The permit user representative(s) must also indicate whether there are any comments associated with work and note these comments in the Debriefing Section on the bottom of the back side of the permit. Comments in the Debriefing Section are mandatory for every Confined Space Entry.
- 3.6.13.2.4 Obtain signatures from a permit user representative. The owning department must sign off the permit within 24 hours to certify that the permit has been fully terminated. Record the time of both signatures.

3.6.13.3 Right to Deny Acceptance

- 3.6.13.3.1 The owning department may deny the returned area or equipment for reasons including but not limited to:
- if the permit's field copy was not returned,
 - if proper housekeeping did not occur,
 - the post joint job site visit did not occur as requested,
 - the equipment was unsafely returned after maintenance,
 - or for other significant problems with the permit.
- 3.6.13.3.2 If a permit's acceptance back is denied, this should be indicated by the owning department on the permit along with the reasoning for the denial. The permit shall be signed off to terminate the permit.
- 3.6.13.3.3 Denied permits cannot be sent to the Safety Department for

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

retention until the deficiencies causing the permit's denial of acceptance back have been addressed by the owning department's supervisory personnel or their designee.

3.6.13.3.4 The permit may be sent to Safety for retention once any deficiencies have been addressed and noted as such on the permit.

3.6.14 Instructions to Complete the Work Permit (Top, Back of Permit)

3.6.14.1 Work permits include instructions for permit completion. If there are variations between the instructions on the back of the permit and the information in this procedure, this procedure's language should be followed.

3.6.14.2 The permit's instructions list responsible parties for filling out the sections of the permit. These responsible parties are also listed in this document in the definitions section of this procedure.

3.6.14.3 Regardless of whose responsibility it is to fill out these sections, all parties shall review all sections before signing the permit.

3.6.15 Entrants Log

3.6.15.1 Authorized entrants must be logged in and out each time the confined space is entered or exited.

3.6.15.2 All confined space entrants must be trained as defined in [PR-1 Confined Space Entry](#) to meet entrant requirements.

3.6.15.3 Entrants are responsible for reviewing the job site conditions and permit requirements prior to entry into a confined space.

3.6.16 Entry Supervisor Sign On/Off

3.6.16.1 Each permit must identify by name the MPC Entry Supervisor for the confined space entry.

3.6.16.2 In the event there is a change in the Entry Supervisor, the original Entry Supervisor must inform the new Entry Supervisor of the requirements of the permit. The change in Entry Supervisors must be noted on the permit.

3.6.17 Attendant Sign On/Off

3.6.17.1 Each permit must identify by name all hot work attendants (or fire watches), bottle attendants (or bottle watches), and confined space attendants (or hole watches).

3.6.17.2 These personnel must list the date and each time period they serve as an attendant in this role.

3.6.18 Debriefing Section

3.6.18.1 Each servicing representative craft or company shall comment during debriefing on conditions confronted or created during the permitted work if applicable.

3.6.18.2 This section's completion is mandatory for all confined space entries but is recommended for any work requiring attendants.

3.7 DISPLAY AND HANDLING OF SAFE WORK PERMITS

3.7.1 Once issued, the soft copy of each Safe Work Permit must be kept with the permit writer in a designated area for permit writing.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 3.7.1.1 The Oil Movements, Power 2 OSBL, and Environmental Facility OSBL Operators may keep the soft copies in their vehicles, provided Operators notify Owing Department Supervision of unscheduled work.
- 3.7.2 The field copy of each work permit must be securely fastened to the piece of equipment being maintained. If this is impractical, it shall be posted at a point immediately adjacent thereto and shall be clearly visible at all times while the work is in progress.
- 3.7.2.1 For TAR's, field copies of each work permit may be posted on permit stands in a central location that are still visible and accessible from the work location.
- 3.7.3 For mobile work sites (e.g. mowing grass, grading roadways, vehicle entry only, etc.), the field copy of the Safe Work Permit must remain with the work crew.
- 3.7.4 For vehicle entry, see 3.3.1.2.
- 3.7.5 Following permit Return of Equipment/Work Area Job completions, the field copy and soft copy must be returned to the appropriate area operator and realigned together.
- 3.7.6 Permits shall be reviewed for accuracy by an owning department supervisor, and then forwarded to the Safety Department and filed per the records retention policy (see section 3.4.5).
- 3.7.7 If the field copy is damaged, lost, or missing the soft copy must be immediately closed out and a new Safe Work Permit must be obtained.
- 3.8 JOB SAFETY ANALYSES (JSA)
- 3.8.1 All permitted work performed by Contractor and MPC Craft shall complete a JSA form prior to starting work. Owing department tasks that could have a negative impact to the work site or pose an exposure concern shall complete a JSA form at the discretion of owning department supervision. The JSA shall be filled out and discussed during the Joint Job Site Visit for permitted work or the tool box talk with the work crew in work areas covered by JSA only (See Attachment B Scope of Application for Safe Work Permit). The JSA shall be kept with the hard copy of the Safe Work Permit if applicable.
- 3.8.1.1 EXCEPTION: If there is an approved Operations, Maintenance, or Departmental procedure that covers the hazards of the task, it may be used in lieu of a JSA.
- 3.8.2 Contractors working at the Galveston Bay Refinery shall use their company JSA if they have one. If contractors do not have a company JSA they shall use the GBR JSA (Attachment E).
- 3.8.3 Approved JSA
- 3.8.3.1 For some activities or tasks, it is important to capture the JSA Process to be used again when the same task will be executed in the future. The Approved JSA was created for this reason. Examples of these tasks include:
- Jobs with a high frequency
 - Jobs with a high frequency of accidents
 - Jobs that have produced recordable injuries
 - Where Serious Incidents or Fatalities have occurred in the past
 - Tasks that have caused environmental harm
 - Jobs that have recognized high risk
 - Jobs in which equipment or procedures have changed
- 3.8.3.2 Each Approved JSA will have will be stored in the JSA Library for future use.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

3.8.3.3 Developing an Approved JSA

- 3.8.3.3.1 Those wishing to submit an Approved JSA and add it to the library shall fill out a blank Approved JSA form and submit it to the Safety Department for review and approval. Once approved, it will be added to the library for future use.

4.0 DEFINITIONS

- 4.1 Blinding - Absolute closure of a pipe, line, or duct, by fastening across its bore a solid plate, plug, or cap which completely covers the bore, extends at least to the outer edge of a flange's mating surfaces, and is capable of withstanding the maximum upstream system pressure. Examples of Blinds include: A blank, slip plate, blind flange, cap, and/or physical disconnect.
- 4.2 Cold Work - Maintenance, repair, cleaning, or construction activity, not requiring the use of fire, hot surfaces, spark producing equipment, or electrical equipment that's not classified for use in the area. Also, see the definition of hot work.
- 4.3 Competent Person (for an excavation) - Marathon or contractor person who can identify existing and predictable hazards in and around the excavation and who has the authority to take prompt and corrective measures to eliminate them. This person has also received specialized training to identify hazards associated with excavations, shoring, and trenching amongst other excavation hazards.
- 4.4 Contractor Coordinator - Normally the Marathon Petroleum Company LP (MPC) employee in charge of coordinating contract companies on jobs. However, on new construction projects, the construction management coordinator hired by MPC shall be designated as the Marathon Contractor Coordinator.
- 4.5 Completed Work – Work activity where all assigned execution tasks are completed, and equipment is released back to Owning Department
- 4.6 Confined Space - Is large enough and so configured that an employee can bodily enter and perform assigned work. It is not designed for continuous employee occupancy and has limited or restricted means for entry or exit (for example, tanks, vessels, towers, sewers, excavations 4 feet deep, vessel skirts unless identified as otherwise, vaults, and pits are spaces that may have limited means of entry or exit). See [PR-1 Confined Space Entry](#) for further information.
- 4.7 Energy Isolation – See PR-14 Energy Isolation.
- 4.8 Entry Supervisors - (Maintenance Foreman, Owning Department Supervisor, Contractor Coordinators (including Directly Supervised Employees acting as Coordinators), or any equivalent acting supervisor). responsible for determining if acceptable entry conditions are present at the permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required.
- 4.9 Group Permit – a safe work permit where one or more craft or company is listed jointly as the authorized company or craft on the permit.
- 4.10 Hazardous Atmosphere - An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness. See [PR-1 Confined Space Entry](#) and GBR-HESS-PPE-05 Respiratory Protection for a compilation of normally encountered vapor and gas hazards at a refinery.
- 4.11 Hot Tapping - The practice of installing a valve connection and then drilling or cutting into the pipe or equipment, through the valve connection, while the pipe or equipment is in service or has not been purged (hydrocarbon gas freed). GBR-HESS-PR-24 In-service Welding and Hot Tapping Procedure covers detailed permit requirements for hot taps.
- 4.12 Hot Work – Repair, maintenance or construction activity, which requires the use of spark-

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

producing equipment or may create an ignition source. Galveston Bay Refinery has designated the areas that require hot work permits and whether the hot work requires a designated hot work attendant (or fire watch) during the hot work.

- 4.12.1 *Attended hot work*, or work that requires a fire watch. For examples, see [PR-2 Hot Work](#).
- 4.12.2 *Non-Attended hot work*, or work that does not require a fire watch. For examples, see [PR-2 Hot Work](#).
- 4.12.3 Hot tapping and welding on lines or equipment under pressure or not gas-freed requires special permit following the requirements of GBR-HESS-PR-24 In-service Welding and Hot Tapping Procedure.
- 4.13 Immediately Dangerous to Life or Health (IDLH) - Any condition that poses an immediate or delayed threat to life or would cause irreversible adverse health effects or interfere with an individual's ability to escape from a confined space.
- 4.14 IDLH Atmosphere – Any area that may have an atmosphere that is immediately dangerous to life and health.
- 4.15 Incomplete Work – Execution activity is not mechanically complete and waiting on parts or components. This activity is not scheduled to continue on the following available working day.
- 4.16 Inert Confined Space – See PR-5 Inert Confined Space Entry
- 4.17 In-Service Welding - The practice of welding on pipe or equipment (e.g., tank, vessels, exchangers, etc.) which is in-service or has not been purged (gas freed) through conventional methods. This includes grinding, burning, and welding for any purpose, such as adding brackets, shoes, boxing in leaks, adding weld-o-lets and back welding fittings. GBR-HESS-PR-24 In-service Welding and Hot Tapping Procedure covers detailed permit requirements for in-service welds for this activity.
- 4.18 Invasive Work – Any work that expects to require exposure to the internals of a vessel, pump, exchanger or any other piece of refinery equipment (i.e., piping, sewers, tanks, hoses, etc.).
- 4.19 Issued Work Permit- A completed permit that has been signed by all required parties indicating work can begin.
- 4.20 Joint Job Site Visit - A meeting between an owning department representative and at least one servicing representative from all parties working under the permit at the specific location where the job will be conducted. The meeting discussion will address the work scope and all safety aspects of the permit. The servicing representative that attends the joint job site visit must convey the information covered in the joint job site visit to all members of their work party.
- 4.21 Non-Invasive Work – Any cold work or hot work being done where there is no potential for contact with product exposure hazards, process hazards, vessels, pumps, electrical breakers, piping or any other piece of refinery equipment.
- 4.22 Ongoing Work – Execution activity that has been completed for the day and is scheduled to be continued the following scheduled work day.
- 4.23 Outlying Area: An area that lies beyond any process area, tank farm, dock area, or other area that is not owned by Operations or Product Control personnel. Owing Departments for outlying areas have been assigned per the Permit Responsibilities for Outlying Areas Map shown in the following link: Attachment C - GBR Area Ownership Map.
- 4.24 Owning Department - The term “owning department” refers to the department that owns and operates process, process-related, and/or utility equipment, machinery, building, and/or systems. This term also applies to MPC directly contracted Construction Managers and their supervisors working on construction projects unrelated to the refinery processes.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 4.25 Owner Supervisor: The Marathon owning department's supervisor. This is typically, although not always, a Shift or Unit Supervisor.
- 4.26 Oxygen Deficient Atmosphere – Any atmosphere containing less than 19.5% oxygen by volume.
- 4.27 Permit User Representative- The member(s) of the servicing group who will be working from the permit or who represents the personnel working on the permit.
- 4.28 Permit User Supervisor- the person who directs personnel in carrying out specific tasks and to whom the permit user directly reports
- 4.29 Permit Writer- The member of the Marathon owning department or directly hired Construction Managers who writes the permit and is properly trained in Marathon's permit writing system.
- 4.30 Process Break - The opening of a process system to the atmosphere for the purposes of maintenance or new construction. Examples include separating flanges and opening exchangers. Operational venting, draining, purging, etc., of equipment is not considered a process break.
- 4.31 Responsible Persons – These include the MPC Permit Writer, MPC Owing Department Supervision/Designee, Permit User Representative, Permit User Supervisor, MPC Contractor Coordinator, MPC/Contractor Competent Person, and Safety Representative for the job-specific task, area, or contractor.
- 4.32 Routine – As in an employee's routine tasks or jobs; these are those work activities the employee regularly performs (i.e. daily, weekly, several times a month). Tasks or jobs that are infrequently performed or not routine may require a safe work permit (i.e. infrequent jobs that may require respiratory protection or that introduce additional hazards).
- 4.33 Safety Representative –Marathon (or Marathon directly supervised contractor) Safety Professional.
- 4.34 Servicing Representative(s) - The people who are working on the equipment/process. This may include operations, blending shipping, maintenance, contractors and salaried employees.
- 4.35 Stopping - The practice of using a device (stopple) through a hot tap connection to isolate a section of pipe for repair and/or revision without depressurizing or purging. GBR-HESS-PR-24 In-service Welding and Hot Tapping Procedure covers detailed permit requirements for stopping, as appropriate.
- 4.36 Vehicle Entry – Defined as any passage of a motorized vehicle across the battery limits of an operations complex, into a tank farm diked area, or into any area where classified electrical equipment is required. Vehicle entry is a form of non-attended hot work.
- 4.37 Work Party – Includes all personnel whose tasks are covered by the work permit.
- 4.38 Work Permit Extensions - The extension of the work permit by the owning department at the end of the maintenance shift or at the end of 12 hours. As conditions warrant, a work permit may be extended one time, for a total time period of 24 hours.
- 4.39 Work Scope – The type and detailed description of the work to be performed including the equipment to be worked on and the personnel performing the work.

5.0 REFERENCES

- 5.1 Occupational Safety and Health Administration, 29 CFR 1910.134, "Respiratory Protection "
- 5.2 Occupational Safety and Health Administration, 29 CFR 1910.146, "Permit-required Confined Spaces"
- 5.3 Marathon Petroleum Company LP, [Refining Standard Practice. RSP-1128-000 Safe Work Permit](#)

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- 5.4 GBR [PPE-7 Fall Protection/Ladder](#)
- 5.5 GBR [PR-1 Confined Space Entry](#)
- 5.6 GBR-[PR-2 Hot Work](#)
- 5.7 GBR [PR-5 Inert Confined Space Entry](#)
- 5.8 GBR [PR-14 Energy Isolation](#)
- 5.9 GBR [PPE-5 Respiratory Protection](#)
- 5.10 GBR-HESS-PR-24 In-service Welding and Hot Tapping Procedure

6.0 ATTACHMENTS

- 6.1 Attachment A: Safe Work Permit
- 6.2 Attachment B: Scope of Application for Safe Work Permit and Risk Assessment
- 6.3 Attachment C: GBR Area Ownership Map
- 6.4 Attachment D: Invasive Work Risk Assessment Matrix (RAM)
- 6.5 Attachment E: GBR Job Safety Analysis Form.

7.0 REVISION HISTORY

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original Issue. Consolidates GBR-HESS-PR-03 and RSW-0001-TC under MOC M20182682-001.	C. T. Lamb	J. G. Montminy	9/27/2018	11/26/2018
1	Clarifies that SWP is not required for chemical loading and unloading if performed in accordance with ROP-REFY-7000-GB.	M. K. Alberts	S. Windom	11/12/2019	11/12/2019
2	Clarifies JJSV requirements if the Supervisor/Crew Leader changes.	C. T. Lamb	E. R. Kaysen	3/17/2021	3/19/2021
3	Updated to address following under MOC. 106917: <ul style="list-style-type: none"> • Adds language to comply with RSP 1128 on blanket permits from Incident # 288298 • Adds responsibility for MPC Maintenance Supervisor oversight of some 3rd party work from Incident # 275656 • Removes SWP maps from SWP policy in favor of E-Plot application. • Adds Analyzer PMs to list of activities that do not require a SWP per RSP 1128. • Removes safety department role of monthly auditing to determine SWP program effectiveness. 	C. T. Lamb	H. F. Sheard	5/18/2022	8/22/2022

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

	<ul style="list-style-type: none"> • Clarifies MPC Contractor Coordinator role. • Clarifies Training Department role. 				
4	Clarifies unpermitted work pertaining to mowing and weeding.	A. M. Chalin	H. F. Sheard	4/26//2023	5/11/2023
5	Adds existing Work Location Tags requirements from Energy Isolation procedure, and adds energized parts/electrical to JSA form.	A. M. Chalin	H. F. Sheard	8/16/2023	9/5/2023

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

Attachment A: Safe Work Permit

[Safe Work Permit](#)

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

Attachment B: Scope of Application for Safe Work Permit and Risk Assessment

Process Areas

“Process Areas” include areas controlled by Operations (ISBL and OSBL), Facilities and Services (F&S), or Outside Utilities/Electrical (OSUE). In these three key areas, Maintenance or Project work shall be permitted by a Safe Work Permit (SWP) as described in the HESS Practice PR-3 Safe Work Permit Practice.

The following tasks do not require a Safe Work Permit when being performed in Process Areas

- Owning Department tasks associated with equipment isolation.
- Electrical isolation by craft that is associated with a Master Isolation List and performed under a risk assessed maintenance procedure.
- Owning Department tasks including Owning Department Work Incidental (OWI) Cold Work tasks.
- Chemical truck loading and unloading performed in accordance with operating procedure, [ROP-REFY-7000-GB GBR Chemical and Bulk Delivery Transfer Procedure](#).
- Non-stationary mobile equipment and hand-held electrical devices in roadways and established parking areas.
- Non-permitted work for Facility & Services (as listed below) inside pressurized buildings.
- Permits for third party work on their equipment/facilities located on MPC property will be issued by the applicable owner/lessee in accordance with their company’s procedures and Section 3.3.1.2. The third party’s safety work plan will be approved by the respective Owning Department (PWR2/OSUE and OMCC) in the area in which the work will take place.

Process areas will be shown in Plant Layout Showing Free Burn Areas for [East/West Plant](#) and Bay Plant. Applicable Safe Work Permits outside of defined areas shall be approved and issued by Oil Movements unless specific responsibility is stated on the permitting ownership maps and agreement/understanding has been reached between appropriate supervision on a case by case, job by job basis.

Non-Process Areas

Work will generally be covered by risk assessed procedures or Job Safety Analysis (JSA).

Safe Work Permits and form(s), when required, are also required for the following work per the applicable HSSE policy or practice:

- Attended hot work
- OSUE work not covered by risk assessed procedure
- Energized electrical work
- Fall protection required work
- Confined Space Entry
- Other work when supplemental form required (such Master Isolation List, excavation, lifting, potential ACM removal, etc.) per the applicable HESS policy or practice.

Hot work permits are not required for non-maintenance activities in the ATLS Lab performed by ATLS Lab Technicians only.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

Non-process work areas include:

- Outside immediate perimeter areas of the Central shops and office areas,
- Outside immediate perimeter areas of the Craft Bldg. Shop and office area,
- ATLS Laboratory (Lab Technicians activities only),
- HEO yard and building office area,
- Fire Department buildings and offices
- Outside immediate perimeter of the Garage shop area and Garage office areas
- Main scaffold yard and Carpenter Shop,
- On-site warehouses
- On-site office complex buildings (ESB, ATLS, NOB and GOB) and surrounding areas
- Off-site offices and Warehouses
- Off-site outdoor areas

Free Burn Areas

Same rules as Non-process areas apply, however, attended hot work does not require permit.

These areas are:

- Fire Drill Grounds (Fire department activities only),
- Inside the Central Shops (machine, welding and instrument & electrical),
- Inside the Craft Bldg. and the Garage Shop areas,
- Dock Maintenance Shop and Fabrication Area,
- Jacobs/Zachry Fabrication Compound,
- PIP Shop and Fabrication areas,
- Sandblast/paint yard,
- Off-site welding huts at Merville.
- Designated smoking areas

Non-Permitted Work for Facilities & Services

The following Facilities & Services work does not require a permit in non-process areas or inside pressurized buildings in Process Areas. This work will be covered by risk assessed procedures or JSA.

- Door repair (hardware adjustment, locksmith etc.) in administration buildings. No door replacement.
- Grass cutting, weed cutting, trimming trees and hedges will be non-permitted work unless in a process area or tank farm dike wall.
- HVAC PM where LOTO is not required, such as filter, lube and coil, visually inspect belts, clean drain pans
- Install "L" brackets and/or 1"x2" board to shelves

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- Install and/or remove banners and signs on the fences, lunch tents, and ESB
- Testing and calibrating L.E.L. detectors in occupied buildings
- PM badge readers and Lenel Controllers
- PM cameras (only cameras that can be done without working at heights in accordance with site policies).
- PM ice machines (Ice machine must be unplugged to PM. If ice machine needs to be changed out, a SWP is required.)
- PM overhead doors (only overhead doors that can be done without working at heights in accordance with site policies)
- PM turnstiles (only turnstiles that can be done without working at heights in accordance with site policies)
- Remove and replace damaged street signs (hand tools only)
- Repair damaged sheetrock and paint
- Replace florescent light bulbs and clean lens in office buildings, garages, warehouses and control rooms that can be done without working at heights in accordance with site policies.
- Replace potable water filter on ¾-inch water line or less
- Replace (cord & plug connected) window unit AC without LOTO
- Replace, remove, or install: soap, paper towel or toilet paper dispensers
- Replace/move/install pictures, whiteboards, corkboards, file folders or shelves
- Sand and/or paint doors
- Striping and panting curbs, crosswalks and parking lots (If using striping machine, a unattended hot work SWP is required)
- Survey building pressure system, check belts, dampers, scrubbers, pressure fans, air filters, pressure damper controls
- Testing emergency lighting and exit signs
- Unstop commode, floor, sink and urinal drain (If using a gasoline or electric machine outside of unit buildings, a unattended hot work SWP is required)

Non-Task Related Activities That Do Not Require Safe Work Permit or Job Safety Analysis

Certain non-task related activities listed below do not require a Safe Work Permit and/or a JSA. When these activities are performed in permit to work areas, only operations notification and unit sign in is required, and vehicles cannot be used to assist with these activities.

- Writing permits
- Scoping out job site
- Locating isolation points, blinding, verification points
- Covering sewers
- Establishing layout areas to be barricaded
- Staging fire extinguishers if necessary
- Inspecting scaffolding

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

- Visual inspection
- Eng. surveys, walk around, audits, planning walkthroughs at grade
- Routine housekeeping by Operations
- DCS work if not impacting control or alarm devices
- Work inside office buildings including office equipment repairs, except for craft activities normally requiring permits

This attachment is defined and maintained by the H&S Supervisor.

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: PR-3 Safe Work Permit Procedure	Doc Number: RSW-000030-GB	Rev No: 5

Attachment C: Area Ownership Map

[ePlot \(mgrouper.com\)](http://mgrouper.com)

See Base Plot Plan for Safe Work Permitting Areas

Attachment D: Invasive Work Risk Assessment Matrix (RAM)

[Invasive Work Risk Assessment Matrix \(RAM\)](#)

Attachment E: GBR Job Safety Analysis Form

[GBR Job Safety Analysis Form](#)