

**Gulf**of**Mexico**



## **Operations: HSE**

**General Safety Rules Safe Work Practice  
(SWP)**

## AMENDMENT RECORD

Amendment Date	Revision Number	Amender Initials	Amendment
03/01/2017	9	CL	3.10 Ladder Usage Requirements was added by adopting text from UPS-US-SW-GOM-HSE-DOC-00118-2 Ladder Usage SWP and making that document obsolete.
02/20/2015	8	PT	<p>Text was modified to incorporate additional verbiage from the GoM Jewelry SWP to enable the retirement of SWP.</p> <p>Text was modified to gain alignment with GoM Electrical Safety SWP.</p> <p>Section 3.6 "Procedures and Practices (OMS 4.1)" was added to hold a new rule for operating with an unlit flare.</p> <p>Document was moved to the current document template</p>
03/24/2014	7	PT	<p>Purpose/Scope section of the document revised for it to be included as part of the personnel induction process.</p> <p>Document was reformatted to identify OMS sub-elements and how the rules implement OMS expectations.</p> <p>Key Responsibility section revised to clarify who is responsible to comply with the document and comply with all GoM safe work practices.</p> <p>Personal Safety Requirements modified to better align with induction process.</p> <p>Expanded dropped objects into a separate section - Dropped Object Prevention Requirements.</p> <p>Control of Work Requirements edited to better fit the new scope of the document and to include Ultimate Work Authority language.</p> <p>Emergency Response section edited to better align with induction process. Added clarity of smoke products to include electronic cigarettes, vapor cigarettes, "E-cigs".</p> <p>Environmental Requirements section added for better alignment with personnel induction process.</p> <p>Incident Reporting Requirements section incorporated SEMS II requirements.</p> <p>Security section expanded to better align with personnel induction process including wording on the BP Weapons Policy.</p> <p>Health/Industrial Hygiene section expanded to better align with personnel induction process.</p> <p>Key Documents/Tools/References section edited to include regulations that can be referenced.</p> <p>Removed: Definitions section and the Valve Altered Register for better alignment with scope.</p> <p>All new additions to the document are highlighted in blue font.</p>

02/04/2013	6	PT	Per CoW Authority, removed references to JSEA and replaced with appropriate level risk assessment
01/24/2013	5	PT	Removed cell phones, iPods, and MP3 players as approved for use outside of quarters and commons areas.
08/27/2012	4	PT	Reformatted document to meet GoM document control template guidelines. Added CoW requirements, photo / video, and dropped object language Removed Zippo Lighters as approved for transport offshore Removed reference to rings and jewelry which will be covered by new GoM Jewelry Policy.
06/01/2008	3	RK	General Safety Rules removed from this section and are referenced within one of the following Chapters: Helicopter Safety, Short Service Employee Program, Stop Work Authority Program (CoW), PPE, Incident Notification, Reporting and Investigation, Scaffolding, Working at Heights, Energy Isolation, Bypassing Safety Systems and Devices, Barriers and Barricades, and Flammable/Combustible Liquids Storage and Handling New rules in regards to horseplay, "Contact type" contests of strength, taking a valve out of its normal operating position, temporary energized piping and hoses, occupied buildings and JSEAs and prohibited the use of multi-purpose tools
06/09/2006	2	KK	Addition of stop work authority. FRC required. Steel-toed shoes must have a distinctive heel.
			Fall protection required when working within 6 ft of a handrail. When working over water, fall protection with PFD is recommended. Number of days that are allowed to be worked offshore has been limited to 21 days. Work hours were extended to 16 hours. Maximum weights allowed for manual lifting has been added to this section. Changed 3 authorities and 1 custodian. Changed CD # from 10007 to UPS-US-SW-GOM-HSE-DOC-00106-2 to conform to new numbering nomenclature inside of the new GoM HSSE doc base.
07/23/2002	1	RB	Revised jewelry item on page two and added contact lens use language to align with GoM Safe Practices Pocket Manual.
01/24/2002	0	RB	Initial issue as controlled document. Prior revision history located in hard-copy consolidated manual.

## TABLE OF CONTENTS

<b>1</b>	<b>Purpose / Scope</b>	<b>6</b>
<b>2</b>	<b>Key Responsibilities</b>	<b>6</b>
<b>3</b>	<b>Requirements</b>	<b>6</b>
3.1	Personal Safety Requirements (OMS 3.2)	6
3.2	Dropped Object Prevention Requirements (OMS 3.2)	7
3.3	Health and Industrial Hygiene Requirements (OMS 3.4)	8
3.4	Security Requirements (OMS 3.5)	9
3.5	Environmental Requirements (OMS 3.6)	10
3.6	Procedures and Practices (OMS 4.1)	10
3.7	Incident Reporting Requirements (OMS 4.4)	10
3.8	Control of Work Requirements (OMS 4.5)	11
3.9	Emergency Response / Fire Protection Requirements (OMS 4.6)	12
3.10	Ladder Usage Requirements (OMS 3.2)	13
<b>4</b>	<b>Key Documents / Tools / References</b>	<b>14</b>
4.1	General Safety Clause - William-Steiger OSHA Act of 1970	14
4.2	29 CFR 1910 Subpart E Exits Routes, Emergency Action Plan and Fire Prevention Plans	14
4.3	29 CFR 1910 Subpart H Hazardous Material	14
4.4	29 CFR 1910 Subpart I Personal Protective Equipment	14
4.5	29 CFR 1910 Subpart M Compressed Gas and Compressed Air Equipment	14
4.6	29 CFR 1910 Subpart Q Welding, Cutting, and Brazing	14
4.7	29 CFR 1910 Subpart Z Toxic and Hazardous Substances	14
4.8	30 CFR 250.193	14
4.9	30 CFR 250.1933	14
4.10	30 CFR 250.300(b) (6)	14
4.11	33 CFR 106 Subpart H Outer Continental Shelf	14
4.12	29 CFR 1910.27 Subpart D Walking-Working Surfaces Scaffolds and Rope Descent Systems	14
4.13	29 CFR 1910.28 Subpart D Walking-Working Surfaces Duty to have fall protection and falling object protection	14

# 1 Purpose / Scope

This Safe Work Practice (SWP) describes general requirements that personnel shall adhere to while working at GoM Region facilities, including onshore facilities (e.g., BP Controlled sites, Fourchon Supply Base, PMF/HOLC, and the PHI Heliport). This SWP supplements personnel inductions to assist in describing safety, security, health and general safe work practice expectations. This SWP describes how GoM Region implements multiple OMS expectations, including:

- OMS 2.2.4 Personnel Inductions
- OMS 3.2 Personal Safety
- OMS 3.4 Health & Industrial Hygiene
- OMS 3.5 Security
- OMS 3.6 Environment
- OMS 4.1 Procedures and Practices
- OMS 4.4 Incident Management
- OMS 4.5 Control of Work
- OMS 4.6 Crisis and Continuity Management
- OMS 7.1 Regulatory Compliance

# 2 Key Responsibilities

GoM Region personnel, including employees, contractors, subcontractors and visitors, are responsible to know and comply with these general requirements in addition to all other GoM safe work practices. Every driver, before driving on BP business, should determine:

# 3 Requirements

## 3.1 Personal Safety Requirements (OMS 3.2)

Personal safety requirements include:

- 3.1.1 Personnel shall use handrails when ascending or descending stairways and take only one step at a time.
- 3.1.2 Personnel shall not run in work areas, except to escape dangerous situations.
- 3.1.3 Personnel shall not spray compressed air/gas on themselves or others.
- 3.1.4 Personnel shall not walk into hazardous environments such as natural gas liquids, flammable liquids, smoke or a flammable gas cloud for the purpose of minimizing or stopping a spill or to protect the company's assets.
- 3.1.5 Personnel shall not lean against or support their body weight on any guardrail/handrail. Personnel shall not use guardrails for stabilizing support or load bearing applications. Only signs and safety equipment may be mounted on guardrails.
- 3.1.6 Personnel shall comply with the occupied and non-occupied building list requirements maintained by the facilities.
- 3.1.7 Personnel shall not fish from offshore facilities.
- 3.1.8 Personnel shall be familiar with each facility's specific procedures to access operating areas. Personnel shall not enter production facility areas, drilling facilities or any hull, columns or pontoons without prior authorization unless they are part of a normally assigned work team for that area or are performing a task with an approved Work Control Certificate (WCC).
- 3.1.9 The use of individual knives and multi-purpose tools (such as a 'Leatherman®') are prohibited and will not be allowed offshore or at shore-based facilities. Alternative cutting devices will be provided for tasks (e.g., tin snips, polyvinyl chloride [PVC] cutters, wire cutters, etc.).

- 3.1.10 Personnel shall wear the minimum PPE identified within associated risk assessments and the Facility PPE Matrix for the assigned task. If the proper PPE is not available or unclear, contact the facility HSSE representative for assistance.
- 3.1.11 Personnel shall not wear jewelry that could lead to an injury while outside of offshore quarters or accommodations area. This includes the removal of all finger rings, hoop, dangling, or metallic ear rings, medallions, necklaces, and bracelets and facial jewelry including tongue piercings. Nonconductive, stud type piercing retainers may be used if covered by clothing or bandage. Copper bracelets worn for medical reasons must have an opening and be kept secure and not loose on the wrist. Watches must have break away pins or breakaway connections.
- 3.1.12 Technicians working in electrical energized area such as a motor control center, fire panel, etc. shall not wear conductive clothing or jewelry such as watch bands, bracelets, rings, or necklaces. Non-conductive watches are permitted.
- 3.1.13 Personnel shall not operate equipment unless skilled and knowledgeable on that equipment.
- 3.1.14 Under normal operations, operating machinery and electrical switchgear shall have required safety guards, switches, and alarms in place, and these shall be functioning appropriately.

## **3.2 Dropped Object Prevention Requirements (OMS 3.2)**

Dropped object prevention requirements include:

- 3.2.1 Any material that has the potential to become a dropped object shall be secured. This includes tools, materials, and equipment that are carried on stairways, catwalks, within 6 feet of handrails, over grating or across decks that have the potential to fall to a lower level or overboard. This includes the use of properly rated and secured tool bags, tool belts, lanyards, back packs, or equivalent devices to prevent objects from being dropped.
- 3.2.2 Secure small personal items such as pens, water bottles, and clipboards in such a way as to prevent being dropped or caught on equipment or structures in the area (e.g. pens are to be secured inside of pockets, water bottles are to be carried in a tethered pouch).
- 3.2.3 Hard hats are to have a lanyard or other means to prevent becoming a dropped object. Hand-held radios should be in holsters designed for each specific radio and secured to a tool belt or in a suitable fashion to one's work clothes.
- 3.2.4 For specific guidance pertaining to dropped object prevention while working at heights over 6 feet, refer to the Working at Heights SWP.

## **3.3 Health and Industrial Hygiene Requirements (OMS 3.4)**

Health and industrial hygiene requirements include:

- 3.3.1 Personnel shall report to the medic or other designated person when they use or possess prescription/non-prescription (e.g., over-the-counter) medication.
- 3.3.2 Personnel shall submit to medical evaluation or alcohol/drug testing where cause exists such as suspected alcohol or drug use, post-accident or incident, and when randomly selected.
- 3.3.3 Personnel shall maintain prescription and over the counter medications, including supplements, vitamins, and protein powders, in their original containers.
- 3.3.4 Personnel shall report significant medical conditions (i.e., pacemakers, diabetes, allergies) to the Medic using the Offshore Medical Information Form.
- 3.3.5 Personnel shall not work in excess of 16 hours during a 24-hour period. Personnel shall not work more than 21 scheduled consecutive days offshore unless there is an approved MOC in place. Personnel engaged in drilling and work-over activities should consult the

DWOP manual for drilling-related maximum work day requirements.

3.3.6 Personnel shall limit manually lifting loads to the following criteria:

- 50 pounds chest-level and below.
- 25 pounds above chest-level.

**NOTE:** Manually lifting heavier loads can be accomplished by dividing the weight among more than one person so that no individual is lifting more than the weight limits listed. Mechanical lifting devices shall be used if manual lifting limits will be exceeded.

3.3.7 Personnel shall review the site-specific hazard communication program, understand hazardous chemical labeling requirements and understand how to access hazardous chemicals safety data sheets (SDS) on the facility.

3.3.8 Prior to the arrival of new chemicals on the facility, all personnel, including contractors, shall provide SDS's of all chemicals that they will purchase or bring aboard to BP HSSE representative so that they can be evaluated, approved and added to the 3EOnline SDS system.

3.3.9 Personnel that observe potential Toxic Substance Control Act reporting issues or that have allegations of adverse health or environmental effects due to BP products or chemicals shall contact their GoM HSSE representative, as well as their supervisor.

## 3.4 Security Requirements (OMS 3.5)

Security requirements include:

3.4.1 Personnel are prohibited from possessing or using illegal drugs, drug-related paraphernalia, intoxicating beverages, pornographic material, explosives, hazardous substances, firearms, ammunition, firearm parts or other weapons, such as brass knuckles, tasers, and mace.

3.4.2 Personnel shall not participate in horseplay (e.g., rough or boisterous play) or fighting.

3.4.3 Personnel shall not participate in "contact type" contests of strength recreational activities (e.g., arm wrestling, thumb wrestling, wrist bending, etc.).

3.4.4 No photos or videos shall be taken outside of the quarters/office area without prior approval.

3.4.5 In case of a suspicious package detected, personnel shall leave the area immediately and report situation to their supervisor or call the control room. Hand-held radio or cellular phone should not be used to report such incident.

3.4.6 Personnel shall be aware of and report any suspicious personnel and activities to their supervisor immediately.

3.4.7 BP may conduct unannounced searches of personnel, automobiles, and other personal properties.

3.4.8 Personnel shall not harass any other personnel based on race, color, sex, religion, national origin, citizenship status, age, physical or mental disability, or veteran status.

3.4.9 The BP Weapons Policy strictly prohibits employees, or any person providing services to BP or located on BP premises from possessing weapons of any kind at the workplace. The following penalties apply to any BP employee, contractor, or 3rd party vendor that works in the GoM. This applies to the GoM workplace including heliport, shipping facilities, PMF, HOLC, WestLake campus, and any contracted vessels.

Violation	1 <sup>st</sup> Offense	2 <sup>nd</sup> Offense	3 <sup>rd</sup> Offense
<b>Firearm Violations (Firearms of any kind – loaded or unloaded)</b>	<ul style="list-style-type: none"> <li>BP Employee - 2 week suspension without pay.</li> <li>Contract (includes contingent labor) - 2 week No Fly.</li> <li>Reinstatement upon investigation</li> </ul>	<ul style="list-style-type: none"> <li>BP Employee - Termination</li> <li>Contract – Permanent No Fly Ban</li> </ul>	N/A
<b>Handgun Parts; Ammunition and other weapons (brass knuckles, knives and Tasers)</b>	<ul style="list-style-type: none"> <li>Return contraband to car. Violator allowed to fly the same day.</li> </ul>	<ul style="list-style-type: none"> <li>BP Employee – 2 week suspension without pay</li> <li>Contract – 2 week No Fly</li> </ul>	<ul style="list-style-type: none"> <li>BP Employee - Termination</li> <li>Contract – Permanent No Fly Ban</li> </ul>

### 3.5 Environmental Requirements (OMS 3.6)

Environmental requirements include:

- 3.5.1 Personnel shall dispose of fluids, trash, and/or items in the correct marked and dedicated recycling and trash containers using the proper disposal method (e.g., properly puncturing of aerosol cans before disposal).
- 3.5.2 Personnel shall not throw fluids, objects, trash, and/or any items overboard as this is considered marine trash and debris and is strictly prohibited and punishable by the U.S. Coast Guard and Environmental Protection Agency. Personnel shall report all marine trash and debris accidents to their supervisor immediately.
- 3.5.3 Personnel should report sheens noticed on the water to their supervisor.

### 3.6 Procedures and Practices (OMS 4.1)

Procedures and Practices requirements include:

- 3.6.1 Operating with an unlit Flare is not acceptable unless the proper Operational Risk Assessment (ORA) is performed and documented as per your SOP's.



## 3.7 Incident Reporting Requirements (OMS 4.4)

Incident reporting requirement includes:

3.7.1 Injuries or incidents, regardless of severity, as well as observed safety practice violations, and noncompliance issues shall be immediately reported. The primary means of reporting is directly to your immediate supervisor or the Person-in-Charge; issues may also be documented in Traction. If you prefer to report violations or noncompliance issues and remain anonymous, the primary reporting option is through OpenTalk. OpenTalk is available to all BP employees and contractors and is intended to allow the reporting person to remain anonymous while the reported issue is investigated and resolved. Reports to OpenTalk can be made by:

- Phone: 1-800-225-6141 or
- Intranet: <https://bp.alertline.com/gcs/welcome>

Another means of reporting available to employees and contractors is to the Bureau of Safety and Environmental Enforcement (BSEE). Any hazardous or unsafe working condition and any possible violation or failure to comply with any federal law or regulation relating to the safety of offshore oil and gas operations may be reported to BSEE.

- Phone: 1-877-440-0173
- Internet: [www.bsee.gov](http://www.bsee.gov), or
- Mail: U.S. DOI/BSEE, 1849 C Street NW, Mail Stop 5438, Herndon, VA 20240  
Attention: IRU Hotline Operations

Finally, hazardous or unsafe work conditions and possible violations to US Coast Guard regulations can be reported to the US Coast Guard Officer in Charge, Marine Inspection. US Coast Guard contact information can be obtained through the Person-in-Charge. The identity of the reporting person will not be made available without permission to anyone other than those officers and employees of the Department of Transportation who have a need for the record in the performance of their official duties.

## 3.8 Control of Work Requirements (OMS 4.5)

Control of Work requirements include:

3.8.1 All visitors, including BP employees, contractors, and subcontractors, shall report to a BP representative immediately upon arrival at a site. No work may be started in any area or on any equipment without the knowledge and consent of the BP representative, in accordance with Permit to Work/Control of Work authorization.

3.8.2 An appropriate level risk assessment shall be completed for each job task prior to conducting work activities. The completed risk assessment shall be reviewed and signed by each member of the work party on site prior to conducting the work and shall remain accessible to all personnel involved for the duration of the task.

3.8.3 Electronic devices such as cameras, laptop computers, cell phones, pagers, PDAs, iPods, and MP3 Players shall not be carried or used outside of the quarters/office area on offshore facilities without an authorized Hot Work Spark Potential WCC. Intrinsically safe portable electronic devices that have been certified by a USCG approved third-party testing laboratory can be used without a WCC in the area they are rated for.

3.8.4 The GoM Stop Work Authority procedures grant all personnel the responsibility and authority, without fear of reprisal, to stop work or may decline to perform an assigned task that is perceived to be creating imminent risk or danger to personnel, equipment or the environment.

3.8.5 Personnel shall not enter defined Danger Zones without specific permission from the Offshore Installation Manager (OIM) or designee. Refer to the Barricading and Barrier Requirements SWP for more information.

- 3.8.6 Personnel shall not enter a Caution Zone without understanding the specific hazards associated with the area.
- 3.8.7 Per SEMS II requirements, each BP facility will have a designated Ultimate Work Authority such as the Offshore Installation Manager (OIM) or Captain who has the responsibility and authority to make final decisions as they relate to imminent danger.

### **3.9 Emergency Response / Fire Protection Requirements (OMS 4.6)**

Emergency response/fire protection requirements include:

- 3.9.1 Personnel shall read and understand the Station Bills to familiarize themselves with their role in the facility emergency response plan:
- Personnel shall check their work area and identify the location of firefighting equipment, emergency eyewashes, safety showers, and the current escape routes to survival equipment.
- 3.9.2 Personnel are responsible to know their primary and secondary muster stations, abandonment stations and emergency alarms.
- 3.9.3 Personnel shall maintain clear access to fire extinguishers, alarm boxes, fire doors, air packs, eyewash and shower stations, first-aid kits, life rings, life jackets and other life-saving devices. Personnel shall either remove obstructions or notify their supervisor if egress routes are obstructed.
- 3.9.4 Personnel are only allowed to smoke products (including electronic cigarettes, such as vapor cigarettes and "E-cigs") in designated smoking areas. Electronic lighters in designated smoking areas are the only acceptable lighting devices for offshore facilities.
- 3.9.5 In case of man overboard, personnel shall throw a life ring, yell "man overboard" maintain visual contact and point until others on deck are alerted and a general alarm has been sounded.

### **3.10 Ladder Usage Requirements (OMS 3.2)**

General Ladder usage requirements include:

- 3.10.1 Ladders shall be used for their intended purpose only in accordance with manufactures instructions.
- 3.10.2 Ladders shall be inspected prior to use by a competent individual to ensure they are in good condition and free of defects.
- 3.10.3 Buckets, drums, or other objects shall not be used to substitute for a ladder.
- 3.10.4 Never lean from a ladder where the center of the user's waist or belt buckle is past the edge of the ladder.
- 3.10.5 Both hands shall be available for climbing (Never carry objects in hands while climbing).
- 3.10.6 Raising and lowering of tools shall be by tool case or other positive means that will prevent objects from being dropped and hand tools must be tethered to person when working at heights above 6 feet.

Portable Ladder usage requirements include:

- 3.10.7 Portable ladders shall be made of non-conductive material (metal and wooden portable

ladders are prohibited).

- 3.10.8 Manufactures requirements including warnings, and weight limits shall be clearly visible and followed.
- 3.10.9 Confirm that ladder is secured (tied off) or manually held while in use to prevent slippage (and extends 36" above surface line if using extension ladder).
- 3.10.10 Adhere to the required angle of one foot horizontal for every four feet vertical for straight or extension ladders (for example, 8 foot vertical ladder equals 2 feet horizontal; 10 feet vertical ladder equals 2.5 feet horizontal).

Fixed Ladder usage requirements include:

- 3.10.11 Design, construction, and installation of all fixed ladders shall comply with the OSHA regulation standard (29 CFR 1910.27).

## **4 Key Documents / Tools / References**

- 4.1 **General Safety Clause - William-Steiger OSHA Act of 1970**
- 4.2 **29 CFR 1910 Subpart E Exits Routes, Emergency Action Plan and Fire Prevention Plans**
- 4.3 **29 CFR 1910 Subpart H Hazardous Material**
- 4.4 **29 CFR 1910 Subpart I Personal Protective Equipment**
- 4.5 **29 CFR 1910 Subpart M Compressed Gas and Compressed Air Equipment**
- 4.6 **29 CFR 1910 Subpart Q Welding, Cutting, and Brazing**
- 4.7 **29 CFR 1910 Subpart Z Toxic and Hazardous Substances**
- 4.8 **30 CFR 250.193**
- 4.9 **30 CFR 250.1933**
- 4.10 **30 CFR 250.300(b) (6)**
- 4.11 **33 CFR 106 Subpart H Outer Continental Shelf**
- 4.12 **29 CFR 1910.27 Subpart D Walking-Working Surfaces Scaffolds and Rope Descent Systems**
- 4.13 **29 CFR 1910.28 Subpart D Walking-Working Surfaces Duty to have fall protection and falling object protection.**