SUBPART A - PURPOSE

This Permit to Work System is intended to provide a basis for managing, controlling, training and documenting work activities that fall under BBGCI RAM Medium to Extreme Risk classification must be taken into consideration for a Permit. These risk classifications can be found in BBGCI's Risk Registry which is a Registry of Activities Ranked prior to the proper controls being in place. Work permits are a key component for all safe work operations and when implemented in accordance with this policy, can lead to an incident free workplace.

This Permit to Work System establishes a system to control specific BBGCI operations that present significant risks to personnel, pose environmental risks, damage to the facility, or conflict with other work by introducing hazards and risks not previously identified.

SUBPART B – OBJECTIVE

The objective of the Permit to Work System is to ensure that significant risk work performed by BBGCI is adequately planned, authorized and defined so that the hazards are identified and a mechanism exist for their control. BBGCI Personnel shall use this document as a reference for implementation of a Permit to Work System.

SUBPART C - SCOPE

This Permit to Work System applies to all Berry Bros. General Contractors, Inc. operations.

Any Contractors doing work directly under BBGCI must comply with this Permit to Work System unless an alternative system is approved through the risk management and safety department of BBGCI.

In the event where client permitting requirements are more stringent than this policy, Client's Permit-To-Work policy and requirements will take precedent if necessary.

SUBPART D – DEFINITIONS

Activity Hazard Analysis (AHA) – Complied list of job tasks with required Hazard Mitigation Controls, documentation and a pre-hazard control risk ranking.

Drop Zone- A No-Go Zone, where there is a potential for fallen objects

Permit Administrator - the Permit Administrator must be designated, trained and competent in doing so. The Permit Administrator will issue, control, administer and monitor all work permits from the Permit Control Point.

Permit Control Point- a central location on a particular jobsite that is designated for the distribution, completion, display and administrative control of all work permits.

PIC (Person in Charge) - Highest Ranking Person Responsible for a particular job site

Powerline "Work Zone" - Work Zone – within the goal post flagging which is 23 ft on either side of the power line

RAM- Risk Assessment Matrix see page 11

Risk Registry – List of identified job tasks that has been given a Risk Ranking prior to implementing the proper Hazard Controls.

Tailgate Meeting- an informal safety meeting with all crews that are currently working on that site, which is generally conducted at the job site prior to the commencement of a job or work shift.

Work Permit - document that identifies the work to be done, the hazard(s) involved, and the precautions to be taken. When filled out properly it ensures that all hazards and precautions have been considered before work begins.

SUBPART E – HAZARD CONTROL

Hazard Control is the use of the following methods to minimize potentially hazardous situations:

- Elimination
- Substitution
- Engineering Controls
- Administrative Controls
- Personal Protective Equipment (PPE)

For Hazard Mitigation Controls Specific to a job activity refer to BBGCI's Activity Hazard Analysis (AHA).

SUBPART F – RESPONSIBILITIES

1. **Involved Personnel**
   All involved personnel must be able to understand a work permit, locate the current work permit, and know when a work permit is necessary. All involved personnel performing work covered by a work permit must:
   - Review and Sign off on the Work Permit and JSEA
   - Know and understand the required steps to take if a problem arises during the course of the job by the work permit
   - Know and understand how and why to stop work and request assistance if job conditions change or an emergency occurs.
   - Know and understand the hazards pertaining to the job at hand as well as the hazard controls put in place.
2. **Permit Applicant (i.e. Crew Lead, HSE, etc.)**
   Any individual for BBGCI or subcontractor who will be requesting a permit must:
   - Request and fill out a Work Permit for each Permit Required work activity
   - Communicate the job scope with the Permit Administrator to ensure the permit has been filled out properly and is understood by his/her crew
   - Ensure that the work is completed in a safe and effective manner while being in the limits of the work permit.
   - Ensure that the PIC is aware and familiar with the work being performed.
   - Be familiar with the area and work activity to ensure it is completed in accordance with BBGCI or its client's requirements.
   - Sign off on the "Work Permit Completion" section once the permit required job has been completed or the Permit Duration has expired

- Ensure the work area is left in a safe and clean condition once the shift or workday is complete.
- Ensure all tools and equipment are cleared from the work area upon completion.
- Know and understand all the hazards associated with the work being performed and document this on the JSEA and Work Permit.
- Ensure accurate completion of the work permit, and the permit is returned to the Permit Control Point.

3. Permit Administrator (PIC or HSE)

In order to administer The Permit to Work System and to identify all Work Permit conflicts before they go in effect, the Permit Administrator must be designated (within the SSSWP or Execution Plan), trained and competent in doing so. In the event that the PIC is not the Permit Administrator, the PIC must appoint the individual. The Permit Administrator will issue, control, administer and monitor all work permits from the Permit Control Point.

The Permit Administrator will be responsible to maintain the Permit Control Point and the Work Permit File. The Permit Administrator and the PIC will be the only persons authorized to modify or change a Work Permit. The Permit Administrator will need to sign off of the Work Permit, but is not authorized to approve work permits unless he/she is the PIC or is authorized by the PIC to do so.

The Permit Administrator's responsibilities include:

- The issuance, retention, administration and monitoring of all work permits
- Identifying possible conflicts(multiple permits or adjacent working crews)
- Ensure accurate completion of the permit form
- Ensure that Permits are readily accessible
- Sign off on the "Work Permit Completion" section once the permit required job has been completed or the Permit Duration has expired

4. Person in Charge on Jobsite (PIC)

The PIC is responsible for overseeing the effectiveness of this Permit to Work System, as well as:

- Establishing the infrastructure for the Permit to Work System by establishing a Permit Control Point and appointing a Permit Administrator (if necessary)
- Ensuring personnel know what work activities require Work Permits.
- Monitoring the work permits and ensure all permits contain a clear description of work, its location, start time and duration and is adequately approved

- Ensuring the Permit Control Point is developed and in a central location.
- Ensuring controls are in place to mitigate hazards
- Ensuring personnel who prepare the permits and supervise work are identified on the work permit
- Ensuring the personnel who utilize the work permit system are adequately trained
- The issuance, control and return of Work Permits are effectively managed
- Approving all work permits

5. **HSE Coordinators**
   HSE Coordinators will be responsible for monitoring compliance with this Permit to Work System. The HSE Coordinator will assist in the implementation and monitoring of the Permit to Work System and when necessary will take on the responsibilities of the Permit Administrator.

SUBPART G - WORK PERMITS

1. **Permit Requirements**
   Prior to beginning any work, it is the responsibility of all BBGCI Personnel and contractors to determine if a work permit is required for the proposed work activity. A separate Permit will be required for each permitted activity associated with the job task at hand.

   All Work Permits will:
   - Be properly authorized by the PIC
   - Be signed off by the Permit Applicant, Permit Administrator, PIC, and all involved personnel.
   - Date the approval time and when the permit expires
   - Specify precautions needed to be taken
   - Document the appropriate hazards covered in the JSEA
   - Ensure that work that may affect other work is identified and controlled
   - Is readily available at the Permit Control Point
   - Corresponding work permit numbers must be documented on the JSEA with the specific task.

   Work will not begin unless:
   - The Permit has gone through the approval process and has been authorized by the PIC.
   - The work being performed has been planned and discussed

- The work is going to be performed within BBGCI requirements and guidelines.
- All work barriers are in place to ensure the job will be performed in compliance with the work permits and JSEA's.

2. Permit to Work Process

A. Tailgate Meeting Discussion

Prior to beginning any work on a job site, the HSE Coordinator and/or the PIC on the Job site will conduct their daily tailgate meeting. After a specific HSE topic has been discussed, the HSE Coordinator or PIC will ask/discuss the specific job tasks going on that day. Throughout this period, all job tasks that require a work permit will be discussed.

B. Safety Briefing

Once the Tailgate meeting is completed, the Permit Applicant will begin to fill out a JSEA, Work Permit, and whatever supporting paperwork that will be required for the job being performed that day. Once these documents are completed they must be reviewed and initialed by all crew members involved.
The Permit Applicant will then submit the permit, associated JSEA's and all additional paperwork to the Permit Administrator for review. Once the work permit has been reviewed, signed off, and approved by the Permit Administrator, he/she will then present the permit to the PIC for review and approval.

C. Risk Ranking

Each task that requires a permit must be appropriately risk-ranked at the top of the permit based on BBGCI's Risk Assessment Matrix (RAM). These tasks are ranked without the proper documentation and mitigation controls in place.
The detailed pre-construction AHA document will provide the employee with specific documentation requirements as well as the appropriate hazard mitigation controls to effectively lower the risk of these tasks to allow for safe working conditions for all employees.

D. Authorization

Once the PIC has reviewed, signed and authorized the permit, the Permit Administrator will maintain the permit at the Permit Control Point and notify the Permit Applicant that the permit has been authorized.

The Permit Applicant will then make the necessary arrangements to install specified hazard controls and authorize commencement of the actual work.

3. **Permit Duration**
   To ensure effective control, reduce risk and minimize the possibility of conflict, permit life must be decided before the start of any job.

   Permit validity periods can vary depending on multiple variables but the maximum duration of any work permit cannot exceed 3 days (72 hours). Once a permit is no longer valid, the Permit Administrator must file the permit in a filing system for the duration of the job. Once the Job is completed all paperwork must be turned into the HSE Department.

4. **Work Permit Completion**
   Once the duration of the permit has expired, or the job has been finished, both the Permit Applicant and the Permit Administrator must sign off on the permit under the "Work Permit Completion" sign-off section that the job has been completed.

5. **Cancellation of Work Permits**
   Work Permits can be cancelled by the PIC for a variety of reasons, but a work permit must be cancelled when:
   - Incident/Accident occurs
   - The job scope is altered with additional hazards being present
   - Emergency occurs

6. **Changes to a Permit**
   Once a permit has been approved, changes will not be allowed without the approval of the PIC or the Permit Administrator. In order for the changes to be accepted:
   - The Permit Applicant, Permit Administrator and PIC must agree on the changes
   - The changes are clearly documented on the permit
   - The changes do not conflict with BBGCI requirements
   - Any additional hazards introduced have been eliminated or controlled through hazard controls
   - All affected personnel have been aware of the changes

7. **Permit Filing**
   Active Permits will be kept at the Permit Control Point at all times. Once the permit is no longer active, the Program Administrator will file the permit in his/her filing system for the duration of the job. All permits will be maintained for the duration

of the job, then archived in the permanent job folder. Once the job is complete, the permits will be transferred to the local HSE department for electronic filing.

SUBPART H – ACTIVITIES REQUIRING WORK PERMITS

Each job type being performed by BBGCI and its Sub-Contractors will be assessed based off of BBGCI's Risk Assessment Matrix (RAM) page 11. Any activities involving Significant Risks conducted by BBGCI or its Sub-Contractors will be accompanied with a Permit. Below is a list of activities that may warrant a permit to work, along with the appropriate hazard mitigation controls to be implemented; note that this list does not cover all significant risk activities and the PIC and/or Permit Administrator can require any activity to be permitted if he feels necessary.

No-Go Zone Entry- A hard physical barrier shall be erected around areas where high risk hazards exist that personnel need to keep away from during the job. Some examples include; Lifting Zones for critical/complex lifts, pressure testing areas, drop zones, etc.

Permit Required Confined Space- Contains or has the potential to contain a hazardous atmosphere; Contains a material with the potential to engulf someone who enters the space; Has an internal configuration that might cause an entrant to be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross section; and/or Contains any other recognized serious safety or health hazards.

Ground Disturbance- refers to any mechanical digging, excavating and/or trenching that goes further than the One Call requirements per state. (i.e. Texas=16")

Working from Heights- When construction employees are exposed to falling 6 feet or more from an unprotected edge.

Working near Live Power Lines- Determine the risk if any equipment that is working in the "Work Zone" of a power line, if so a work permit is required with hazard controls in place.
SIMOPS- multiple independent operations that occur on a location at the same time that could interfere with one another or cause some type of work issues.

Lockout Tagout (LOTO)- a safety procedure which is used in industry and research settings to ensure that dangerous machines are properly shut off and not able to be started up again prior to the completion of maintenance or servicing work.

Permit Required Hot Work – Is required when there is a risk of flammable hazards present in the immediate work area, or when hot work is required within 35 feet of hydrocarbons.

Guidance:

1. Move the welding and cutting to safe area with no combustible or flammable hazards
2. Move combustible or flammable hazards away from welding or cutting
3. If cannot do this then permit condition exist and additional barriers are needed to do hot work

Non Routine Lifts: (including but not limited to)

1. Lifts over or within 6 feet horizontally of an active or energized hydrocarbon-containing process equipment
2. Lifts that expose synthetic sling to dynamic, shock, or snatch conditions
3. Lifts with awkward shapes, unbalanced weight, unknown/difficult to estimate weight, center of gravity, or a chance of being stuck
4. Lifts into or out of confined spaces or shafts
5. Lifts requiring bypass of safety devices

Refer to SWP – 67 - Rigging and Material Handling for more information

Complex Lift / Critical Lift-

1. Lifting of Personnel, including rig floor man-riding operations
2. Over or in sensitive areas – active or energized hydrocarbon-containing equipment, near overhead electrical power lines
3. Tandem lift with two cranes
4. Lifting with a helicopter
5. Transferring the load from one lifting appliance to another
6. In environmental conditions likely to affect equipment performance
7. Operator under training
8. Load with unknown/difficult to estimate weight and/or center of gravity
9. Load is special and/or expensive whose loss would have a serious impact on production operations
10. Mobile crane on untested/uneven ground, on moving location, on offshore installation, vessel, barge or mobile
6. Non-standard rigging arrangements
7. Load lowered into or lifted from a confined space
8. Continuation of a lifting operation with different people; for example shift changeover

Refer to section SWP – 67 - Rigging and Material Handling for more information

Working on a Live Electrical System – working on or near any live electrical lines or systems requires a documented permit to be written and approved before any employee can proceed with the required work.

Hot Tap- the method of making a connection to existing piping or pressure vessels without the interrupting or emptying that section of pipe or vessel. This means that a pipe or tank can continue to be in operation whilst maintenance or modifications are being done to it. BBGCI does not conduct Hot Tapping operations therefore Sub-Contractors will perform this operation.

Radiation - includes alpha rays, beta rays, gamma rays, X-rays, neutrons, high-speed electrons, high-speed protons, and other atomic particles; but such term does not include sound or radio waves, or visible light, or infrared or ultraviolet light. BBGCI does not conduct X-Ray operations therefore Sub-Contractors will perform this operation.

Pressure Testing - a test in which pressure vessels such as pipelines, plumbing, gas cylinders, boilers and fuel tanks can be tested for strength and leaks.

SUBPART I – TRAINING

All employees who work for Berry Bros. General Contractors, Inc. will at the minimum receive awareness level training to ensure familiarity with this Permit to Work System. All personnel who are required to use the system must be adequately trained and competent to undertake their responsibilities.

Training must include the following:

- Proper techniques in filling out and issuing permits
- Operations that require Permits
- Where the Permit Control Point is located
- Where to find Permits
- The Steps for permit authorization
- Employee specific responsibilities

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___11-28-18, 3-20-2019_____
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Approved By: Joe Berry & Safety Committee_
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SAFEWORK SUITE		Likelihood				
		Rare	Unlikely	Possible	Likely	Almost Certain
Consequence	**Extreme** Eg. Extensive damage and/or disabling injury, hospitalization or death. Extensive asset or property damage non-operable/total loss.	MEDIUM 13	MEDIUM 14	HIGH 17	EXTREME 19	EXTREME 20
	Major Eg. (OSHA - Days Away, Restricted or Transfer case. Asset or property damage $10K to $50K. Any medical treatment for public injuiries.	MEDIUM 10	MEDIUM 11	MEDIUM 12	HIGH 16	EXTREME 18
	Medium Eg. OSHA Recordable Incident (Medical Treatment). Asset or property damage up to $10K. No public injury beyond first aid.	LOW 4	LOW 5	MEDIUM 8	MEDIUM 9	HIGH 15
	Minor Eg. Non-Recordable, First-Aid only, Minor asset or property damage <$5,000 (operable with repairs).	LOW 1	LOW 2	LOW 3	MEDIUM 6	MEDIUM 7
	Insignificant Eg. No injury or damage low impact hazard such as PPE observations or low impact conditions with no consequence impact.	Insignificant events within the HSE risk assessment matrix are not considered to have significance for tracking and reporting purposes.				