Document Revision Change Table

Revision Number	Revision Description	Revised By	Revision Date
Rev. 14	Annual Procedure Review	G. Dawson	11/18/25
Rev. 14	Revised 3-year retention for permitting and associated documents for "high-energy" only. Also added the EPA 40 CFR 68.3 definition of "Hot Work"	G. Dawson	9/19/24
Rev. 13	Updated Procedure with Air Advisory 0183 to keep All Hot Work Permits for a Minimum of 3 years. MOC 0976-EHS-24-0188	C. Wilding	6/3/2024
Rev. 12	Updated Procedure with new RMP Requirement to keep High Energy Hot Work Permits for a Minimum of 3 years.	G. Dawson	04/08/24
Rev. 11	*Annual Procedure Review (Big 5)*	G. Dawson	12/11/23
Rev. 11	*Annual Procedure Review (Big 5)*	G. Dawson	12/5/22
Rev. 11	*Annual Procedure Review (Big 5)*	G. Dawson	12/20/21
Rev. 11	Added Current Hot Work Map as Appendix E.	G. Dawson	07/22/21
Rev. 11	Procedure Review for PSM Audit	G. Dawson	02/09/21
Rev. 11	Procedure Review	G. Dawson	12/07/20
Rev. 11	Minor Changes from Safety and Health Alert 260	G. Dawson	07/09/19
Rev. 10	**4.7.1** Changed requirement to do quarterly hot work program audits. Requirement will correspond with corporate requirement to inspect at least one hot work job annually. 4.6.8 Verify Internal Components of any vessel involved in Hot Work.	G. Dawson	10/18
Rev. 09	Procedure Review	G. Dawson	12/17
Rev. 09	Procedure Review	G. Dawson	12/16
Rev. 09	Updated for Safety & Health Advisory 219 (Revised Corporate Procedure)	G. Dawson	11/30/15
Rev. 08	Change Monitoring bump test requirements - 4.2.1 and 4.5.2 H Firewatch orange vest requirement	S. Simoneaux	11/29/11
Rev. 07	Highlighted changes reflect corporate mandated changes	S. Simoneaux	3/14/08
Rev. 06	Changed 4.6.4 Two hour monitoring requirements.	S. Simoneaux	2/14/08
Rev. 05	*Considered as starting document for revision change table*		

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1. PURPOSE

To establish minimum standards for activities that can produce heat from flame, sparks or other sources of ignition with sufficient energy to ignite flammable or combustible materials or explosive atmospheres.

2. DEFINITIONS

2.1 4-eyes Principle

The use of at least 2 individuals to review a job or task together in the field to ensure all hazards are identified and eliminated/controlled through safe work practices, use of PPE, communication/awareness, etc. At a minimum this includes a Permit issuer and individual(s) performing work.

2.2 Applicable Distance

The applicable distance for the Beaumont site is 35 feet (10.7 m). Unless otherwise stated, the Applicable Distance applies in all directions from the Hot Work area.

2.3 Blue Area

An area classification, for Hot Work activities, that does not have flammable or combustible processes. These areas would include maintenance shops, new construction grass root projects that have not been introduced to flammable service, and processes that do not contain flammable materials.

Exempt Areas include: Fabrication areas in central and satellite maintenance shops, approved contractor lay down yards, sub-stations, and temporary welding areas as approved by the HS manager. Normal vehicle traffic on paved roadways will be exempt from the permit issuance. Vehicles entering process units or traveling on non-paved areas within 35 feet of process areas must receive a permit. Other types of Hot Work conducted on paved roadways must be permitted according to Table 3-1.

2.4 Combustible

Those materials that could ignite if exposed to an Ignition Source including liquids and solids such as wood, paper, cardboard, textiles, dusts, oils, greases, etc.

2.5 Combustible Dust

A combustible solid material composed of distinct particles or pieces that present a fire or explosion hazard when suspended in air or some other oxidizing medium over a range of concentrations.

2.6 Container

Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, Piping, or the like.

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2. Definitions cont'd.

2.7 Contracted Employee
An individual or group of individuals for whom BASF Corporation (BC) provides direct supervision in their day-to-day activities and direction as to how an activity is to be performed.

2.8 Contractor Employee
An individual engaged by or through a third party to perform services principally for the third party.

2.9 Electrically Classified Area
Locations where fire or explosion hazards may exist due to the presence of flammable gases, flammable liquid–produced vapors, combustible liquid–produced vapors, combustible dusts, or ignitable fibers/flyings. These areas are required to be classified by NFPA 70, Chapter 5 (Example: Class I, Division 1, Group A).

2.10 Explosive Atmosphere
A range of concentrations of gases, dusts, or fibers with air that can support ignition. The range of concentrations is material-specific. The range for a material can vary based on pressure, temperature, and oxygen content.

2.11 Fire Box
A temporary enclosure usually constructed of fireproof tarps that is designed to contain all Hot Work sparks and slag.

2.12 Fire Watch
A person, not performing the Hot Work, who is assigned the responsibility of watching for conditions that may produce a fire as a result of the Hot Work activities.

2.13 Flammable
A material that falls into one of the following categories:

2.13.1. "Aerosol, flammable" means an aerosol that can yield a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any degree of valve opening;

2.13.2. "Gas, flammable" means: (A) A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less; or (B) A gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit.

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2. Definitions cont'd.

2.13 Flammable cont'd

2.13.3. "Gas, liquefied flammable" means: a flammable gas that is handled in a liquid state by keeping it under pressure or at low temperatures. Class 1A flammable liquids, any material with an NFPA flammability rating of "4," and any material with an "F+" rating on the German Gefahrstoffliste are liquefied flammable gases. Process conditions will determine whether or not a material is to be considered a liquefied flammable gas. Any flammable liquid stored or handled significantly above its boiling point but kept liquid by pressure is also considered a liquefied flammable gas.

2.13.4. "Liquid, flammable" means any liquid having a flashpoint below 100 deg. F (37.8 deg. C), except any mixture having components with flashpoints of 100 deg. F (37.8 deg. C) or higher, the total of which make up 99 percent or more of the total volume of the mixture.

2.13.5. "Solid, flammable" means a solid, other than a blasting agent or explosive, that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard.

2.14 High Energy Ignition Source

Operations that produce high heat or excessive sparks, including torch cutting, brazing, welding, grinding, soldering, etc.

2.15 Hot Tap

A procedure used in the repair, maintenance and services activities which involves welding on a piece of equipment (pipelines, vessels or tanks) under pressure, in order to install connections or appurtenances. It is commonly used to replace or add sections of pipeline without the interruption of service for air, gas, water, steam, and petrochemical distribution systems.

2.16 Hot Work

An activity that falls into one of the following categories which are further defined below: flame-or spark-producing, non-rated electrical equipment, or vehicle access. Where the procedure does not specify one of the three categories, the requirements apply to all Hot Work.

2.16.1. The EPA 40 CFR Part 68.3 defines hot work as:
Hot work means work involving electric or gas welding, cutting, brazing, or similar flame or spark-producing operations.

2.16.2. "Flame- or Spark-Producing Hot Work" means an operation that can produce enough heat from flame, spark, or other means, such as friction, with sufficient energy to ignite Combustibles or Flammables.

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2. Definitions (Continued)

2.16 Hot Work cont'd

2.16.3. Includes electric arc and gas welding, grinding, cutting, burning, brazing, Smoldering, post-weld heat treatment, and other spark producing or heat- producing operations.

2.16.4. "Non-rated Electrical Equipment Hot Work" includes the use of electric equipment and electronic devices that are attended 100% of the time in Electrically Classified areas that are not Listed or Labeled for use in the Electrically Classified Area, unless the device is a Portable Electronic Product 1 (PEP1) device.

2.16.5. "Vehicle Access Hot Work: includes the operation of electric, gas, diesel, or internal combustion engines in Electrically Classified Areas, unless the equipment has been approved for use in the area by a nationally recognized testing lab. For example, powered industrial trucks may be manufactured for use in specific Electrically Classified Areas.

Note: Powered Industrial Trucks must be rated for the Electrically Classified Area. See also N-ID-OSA 001.

2.17 Ignition Sources

Include, but are not limited to, open flames, electrical sparks and arcs, hot surfaces, pyrophoric reactions, motorized equipment, electrical tools, extension cords, portable lighting, cameras, cell phones, sandblasting, grinding, chipping, soldering, etc.

2.18 Learning Objective(s)

Specific knowledge, skills, or attitudes the training participant is intended to have learned at the conclusion of the training program. As a minimum, the learning objectives will include applicable regulatory training elements.

2.19 Low Energy Ignition Source

Operations that produce low heat and little or no sparks, such as electrical tools, hammering, lighting, sandblasting, vehicles, etc.

2.20 Lower Explosive Limit (LEL)

The minimum concentration of vapor to air below which propagations of a flame will not occur in the presence of an ignition source. Combustible gas meters (or LEL Meters) measure the % concentration of vapor to air mixtures from 0 to 100 % of the LEL.

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2. Definitions (Continued)

2.21 Listed or Labeled

Equipment that meets identified standards or has been tested and is suitable for a specific use. Independent testing laboratories, such as UL, TUV, CSA, or others, assign a listing number and maintain a list of products that meet the identified standards requirements. The organization maintains periodic inspection of production of listed equipment. The listing organization will use some means to identify listed equipment, which can include labeling.

2.22 Operating/Owning Department

The BASF unit or department that operates or is responsible for the daily operation of the process, area, or facility where work is being conducted.

2.23 Owning/Operating Department Approval

A final, field check to confirm the permit requirements is met. The Shift Supervisor/Team Leader or their designee may perform the permit approval. The person performing the Owning/Operating Department Approval shall sign the Safe Work Permit upon completing the Owning/Operating Department Approval. Approval indicates:

- the applicable work on the schedule matches the Safe Work Permit
- the conditions in the field are safe for the Work Crew to perform their work (i.e., valves did not leak through by checking low point bleeds, verifying bleed valves are not plugged, etc.)
- all Hazardous Energy Source devices have been physically tested and found to be de-energized (i.e., “hit the start button”)
- no other Hazardous Energy Sources are attached to the equipment to be worked inside the boundaries defined by the Isolation/Lockout; example, all purge hoses and steam hoses used for preparation are disconnected, unless otherwise noted on the Isolation/Lockout Paperwork
- the Hazardous Energy Control Procedure and other paperwork are filled out and accurate.
- the immediate area around the equipment to be worked has been checked with the appropriate gas testing equipment for hydrocarbons and/or for toxicity **or other means** as needed.

If any of the above requirements are not satisfactory, the permit shall not be signed or issued.

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2. Definitions (Continued)

2.24 Permit Issuer
Personnel identified by the Operating/Owning Department who a) are trained to recognize Hot Work situations, the requirements for issuing a permit, and the necessary means to safeguard against the hazards posed during these activities, b) are knowledgeable of the area and/or process in which Hot Work is taking place along with the potential hazards, and c) takes responsibility for management of the Hot Work activity.

The Permit Issuer must be a different individual than the personnel performing the Hot Work activity.

2.25 Permanently Installed
Equipment that is hard-wired or equipment used without a person present 100% of the time it is in use.

2.26 Portable Electronic Product 1 (PEP1)
Battery powered, or photovoltaic cell powered device worn in direct contact with the skin. Examples include electronic wristwatches worn in direct contact with the skin and hearing aids inserted in the ear. In order to be exempt from requirements of Hot Work, a PEP1 device must meet all the following criteria:
2.26.1 No visible sparks or excessive temperature during normal operation.
2.26.2 No motors, unless the motor incorporates non-arcing technology.
2.26.3 No visible damage.
2.26.4 No electrical connections accessible outside the product.

2.27 Red Area
An area classification for defining Hot Work activities where flammable materials and flammable processes are present or those areas may/have contained flammable materials.

2.28 Re-issuing a Permit
Means to void the previous permit for work and issue a new permit

2.29 Re-validate a Permit
Means to review the conditions for work specified on the permit, ensure that the conditions are still met and secure the appropriate notifications and approvals.

2.30 Tie-Point Tag
An identification tag (pink with black lettering) that is placed within one foot of where Hot Work process equipment/piping break is to take place.

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2. Definitions (Continued)

2.31 Vehicle Entry
This refers to work activity involving the operation of any electrical (not classified for designated area), gas, diesel or internal combustion engine in a process area or the driving of any such motorized vehicle into a process area as defined by the owning department. Vehicle Entry is recognized as Low Energy Ignition Source Hot Work.

2.32 Yellow Area
An area classification for defining Hot Work activities. These areas are free of flammable materials, but Combustible materials may be present or close enough to be ignited by sparks, convection or transferring of heat.

2.33 Work Crew / Servicing Group
The individuals assigned to a particular job. For the purpose of this procedure, a Work Crew may be comprised of workers from more than one company provided each company involved and the Equipment Owner agree to the arrangement. A Safe Work Permit shall be issued for each Work Crew. The terms Work Crew and/or Service Group are used synonymously for the purpose of this procedure.

2.34 Work Crew Representative
Usually the foreman but could be any member of the Work Crew who is designated by the foreman to take responsibility for the Work Crew by receiving and signing the Safe Work Permit. This person is responsible to review the Safe Work Permit and any additional information they received with the Work Crew prior to the start of the permitted work.

3. SCOPE

3.1 This procedure applies to all Hot Work activities at the BASF Beaumont site.

This procedure **is not** to be used to allow Permanently Installed electric equipment not Listed or Labeled for use in an Electrically Classified Area. Attachment C is included to aid in determining whether or not the equipment can be used by issuing a Hot Work permit

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3. SCOPE (Continued)

TABLE 3.1

LOCATION	TYPE OF IGNITION SOURCE: HIGH ENERGY	TYPE OF IGNITION SOURCE: LOW ENERGY
Red Area – An area within 35 feet of where flammable materials and flammable processes are present or may/have contained flammable materials.	• Hot Work Permit required • Fire Watch Required. • Initial & continuous LEL/0_2 monitoring	• Hot Work Permit required • No Fire Watch Required • Initial & continuous LEL/O_2 monitoring
Yellow Area – An area that is free of flammable materials, but combustible materials may be present or close enough to be ignited by sparks, convection or transferring of heat.	• Hot Work permit required • Fire Watch required • Initial LEL/O_2 monitoring required	• Hot Work permit required • No Fire Watch Required • Initial LEL/O_2 monitoring
Blue Area – An area that does not have flammable or combustible processes.	• No Hot Work permit required • No Fire Watch Required • No LEL/O_2 required	• No Hot Work permit required • No Fire Watch Required • No LEL/O_2 required

3.2 The Owning/Operating department may require additional protection requirements in the Red, Yellow, and Blue areas as deemed necessary to provide a safe work environment.

Example: Building, Warehouses, or an area may be electrically classified as General Usage and be recognized as a Blue area, but the owning department determines that fire /explosion preventative measures are needed then this area would require a Hot Work permit and all requirements would be documented on the Safe Work permit and communicated to the Work Crew for this activity

3.3 Vehicle Entry for designated loading/unloading areas that are classified (Yellow):

- Owning/Operating departments will conduct a visual inspection and perform an initial LEL/O_2 monitoring of the area at the beginning of each shift or prior to first vehicle entry to establish no known flammable vapors or pooling liquid exists.
- The Owning/Operating department will ensure proper housekeeping requirements are maintained and the area's condition has not changed due to unit/area upset conditions or any other means prior to vehicle entry.

3.4 Deviations to the Scope of this procedure must have the approval of the Operations Manager (OM) of the area, the TES Manager – Maintenance, and the HS Manager or their designee**.**

3.5 Hot Tap activities are not covered by this procedure. Site-specific requirements for Hot Tap are found in site procedure BMEHS-002.016.

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4. PROCEDURE

4.1 Hot Work Roles and Responsibilities

See Attachment B of this procedure for roles and responsibilities related to Hot Work.

4.2 Hot Work Authorization

4.2.1 Unless one of the exceptions to obtaining a permit in 4.2.2 applies, no personnel, including Operating/Owning Department personnel, shall perform Hot Work without the prior written authorization in the form of a permit issued by a Permit Issuer. Permits will be issued in the area Permit Room, accept during major projects/turnarounds where another specific area may be designated.

4.2.2 The following exceptions are allowed for issuing a Hot Work permit:

A. Hot Work is allowed in the areas listed below without a Hot Work permit as long as the Hot Work is conducted in a manner that ensures protection equal to the safeguards a permit would have required.

These areas must be included in the program review (section 4.15) to ensure necessary fire prevention precautions are adequate and remain effective.

Hot Work permits are not required (Exempt):

- In maintenance shops
- Temporary welding areas as designated by the HS manager
- Substations
- Designated contractor lay down areas as approved by the HS manager for each project.
- Laboratories performing routine analysis using flames i.e. AA, Bunsen Burner.

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4. PROCEDURE (Continued)

4.2 Hot Work Authorization (Continued)

B. Hot Work in temporary fabrication areas needed during turnarounds or for plant construction may be reviewed and approved for use without a Hot Work permit as long as the Hot Work is conducted in a manner that ensures protection equal to the safeguards a permit would have required. Periodic inspections must be performed at least every 30 days for the duration of use.

C.1 The area Operations Manager, Site Safety Specialist or designee will be responsible for the review and approval of these temporary areas.

C.2 The area will use the MOC process to perform a risk assessment and document the areas which are approved for use.

C.3 The area supervisor will be responsible for periodic inspections.

4.2.3 The permitting process shall use the 4-eyes Principle prior to the performance of any Hot Work to verify all applicable fire prevention precautions found in this procedure have been documented on the permit and have been implemented prior to beginning Hot Work.

4.2.3.1 A Permit Issuer(s) must sign the permit to confirm the risk assessment is complete. Permit Issuer(s) are those who have completed the required EHS training and are qualified in the area being permitted.

4.2.3.2 A Permit Acceptor must sign the permit to acknowledge and agree to the conditions of the permit.

4.2.3.3 The Permit Acceptor must inform all personnel working under the permit about the hazards of the job and the requirements of the permit.

4.2.3.4 The implementation of the identified fire prevention precautions will be verified prior to the introduction of an ignition source from Hot Work. This will be verified on the site Hot Work Permit, using section IV Hot Work Requirements and section VII Approvals.

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4. PROCEDURE (Continued)

4.2 Hot Work Authorization (Continued)

4.2.4 For Flame or Spark Producing Hot Work only: When the Applicable Distance (35 feet) extends beyond the Permit Issuer's Owning/Operating Department, a Permit Issuer from each respective Owning/Operating Department must also authorize the work and ensure necessary fire prevention precautions are implemented and maintained for the duration of the work.

4.3 Prohibitions to Hot Work

4.3.1 Flame-or-Spark-Producing Hot Work is not permitted in the following situations:

- In areas not authorized by the Permit Issuer.
- In buildings or structures where the fire protection system is impaired. **Exception**: The Safety manager and the Risk Insurance Company must agree on the, temporary fire protection provided during Hot Work.
- In the presence of explosive atmospheres that may be present or may develop inside tanks or equipment that may have contained flammable gases, vapors, liquids, or dusts.
- In areas near the storage of large quantities of exposed, readily ignitable materials such as baled paper, card board, wooden pallets, etc.

  Note: A permit to perform Hot Work does not authorize smoking in an area where smoking is otherwise prohibited.

4.3.2 All Hot Work activities must be evaluated to determine whether the equipment upon which the Hot Work will be conducted can be moved to a location outside the production area. If the equipment cannot be moved, then Hot Work may be conducted in accordance with this procedure.

4.4 Precautions for all Hot Work

4.4.1 The equipment used to perform Hot Work shall be in satisfactory operating condition and in good repair.

4.4.2 All personnel performing Hot Work, including Contracted Employees and Contractor(s) shall be informed of the potentially hazardous conditions in the work area and area emergency response procedures.

4.4.3 All work groups involved in or potentially affected by the Hot Work activities shall receive appropriate communication to ensure coordination of activities and prevent adverse impact.

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4. PROCEDURE (Continued)

4.4 Precautions for all Hot Work (Continued)

4.4.4 Verification of the Absence of an Explosive Atmosphere

When Hot Work is performed, verification to the absence of an Explosive Atmosphere in the work area must be performed. The minimum requirements in this section shall be achieved.

4.4.4.1 *For Combustible Dusts*, a visual inspection of the area where Hot Work will be performed must identify any accumulations and airborne dispersions.

A. Accumulations of dust on any surfaces within the Applicable Distance must be removed prior to beginning Hot Work. Surfaces should be cleaned in a way that prevents dust cloud formation.

B. Where airborne dispersions exist, Hot Work shall not be conducted until the source is eliminated, the airborne dispersion settles, and the accumulated dust is removed from the area.

4.4.4.2 *For Flammable gases or Flammable vapors*, a properly calibrated functional combustible gas detector must be used. If a measurable level is detected using a combustible gas indicator operating in the percent range of sensitivity, Hot Work is not allowed or must cease until the source is found, eliminated and subsequent testing meets requirements.

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4. PROCEDURE (Continued)

4.4 Precautions for all Hot Work (Continued)

4.4.4 Verification of the Absence of an Explosive Atmosphere (Continued)

4.4.4.2 *For Flammable gases or Flammable vapors (Continued)*

A. Combustible Gas Instrument Requirements

- Instruments are to be maintained according to manufacturer's specifications. Maintenance shall be documented, and records retained in accordance with BC037: Record Retention Policy, record class code FAC 1060.
- Instrument calibration shall be documented indicating when the instrument was calibrated and who performed the calibration.
- Instruments are to be functionally tested by exposing the sensor to a known gas concentration before each use or daily, whichever is less frequent.
- The minimum oxygen concentration specified in the manufacturer's instructions must be present when conducting combustible gas monitoring (19.5% at minimum).
- The area must be checked with a Combustible gas monitor. If monitoring indicates %LEL levels greater than 0%, Hot Work will not be performed until the source is found and eliminated and subsequent testing meets requirements

B. *Combustible Gas Testing Frequency*

- Verifying the absence of an Explosive Atmosphere must meet the following requirements**:**
- The maximum time between work area monitoring and the start of Hot work must not exceed hours 30 minutes. However, if conditions are subject to change, monitoring should be done more frequently.
- Permits issued for Hot Work must also be re-validated if there is a break in work resulting in the absence of a designated Fire Watch (i.e. 30 minutes).

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Combustible Gas Testing Frequency

	Electrically Classified Area				
	Flame- or Spark-Producing on the Outside of a Container	Flame- or Spark-Producing Inside a Container	Other Flame- or Spark- Producing	Non-rated Electrical Equipment	Vehicle Access
Initial LEL Monitoring	No more than 2 hours before start of work, both inside[2] and outside the container	No more than 2 hours before start of work inside the container	No more than 2 hours before the start of work	No more than 2 hours before the start of work	No more than 2 hours before the start of work
On-going LEL Monitoring	Monitor continuously, both inside[2] and outside the container	Monitor continuously inside the container	Monitor continuously	Required at least every 2 hours	Required at least every 2 hours

	Non -Electrically Classified Area[1]		
	Flame- or Spark-Producing on the Outside of a Container	Flame- or Spark-Producing Inside a Container	Other Flame- or Spark- Producing
Initial LEL Monitoring	No more than 2 hours before start of work, both inside[2] and outside the container	No more than 2 hours before start of work inside the container	No more than 2 hours before the start of work
On-going LEL Monitoring	Monitor continuously, both inside[2] and outside the container	Monitor continuously inside the container	Monitor continuously

1 See NFPA 497, 5.5 and NFPA 499, 6.5 for information on non-electrically classified areas (“un-classified locations”) that may contain Explosive Atmospheres. Sites need to address these situations, if applicable, in their monitoring practices.
2 See 4.7.4 for exceptions to monitoring inside a Container.

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4. PROCEDURE (Continued)

4.4 Precautions for all Hot Work (Continued)

4.4.4 Verification of the Absence of an Explosive Atmosphere (Continued)

4.4.4.2 ***For Flammable gases or Flammable vapors (Continued)***

C. Combustible Gas Testing Locations

- In addition to tests of the general area, tests must be made at the specific area where Hot Work will be conducted or where sparks or other ignition sources may occur.
- When monitoring is required for Flame or Spark-Producing How Work, representative test points within the Applicable Distance of the Hot Work location, including low points (such as sumps, drains, trenches), must be included in the testing locations.

4.5 Precautions for Flame or Spark Producing Hot Work

4.5.1 Personnel performing Flame or Spark Producing Hot Work shall be trained in the safe operation of their equipment.

4.5.2 If the object on which Flame or Spark Producing Hot Work is to be performed cannot be moved at least the Applicable Distance from combustibles and flammables, all moveable fire hazards within the Applicable Distance shall be moved.

4.5.2.1 If all fire hazards can't be removed, then fire-retardant covers or metal shields or fire-retardant guards or curtains shall be used to confine the heat, sparks, and slag, and to protect the immovable fire hazards

- The edges of the covers shall be appropriately sealed to prevent sparks from getting to the fire hazards underneath.
- If several covers are needed, the edges must sufficiently overlap to prevent sparks from getting to the fire hazards underneath.

4.5.2.2 If 4.5.2.1 can't be accomplished, then Flame or Spark Producing Hot Work is prohibited.

4.5.3 Suitable fire extinguishing equipment shall be maintained at the work area in a state of readiness for instant use.

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4. PROCEDURE (Continued)

4.5 Precautions for Flame or Spark Producing Hot Work (Continued)

4.5.4 Fire Watch

4.5.4.1 At least one Fire Watch is required whenever Flame or Spark Producing Hot Work (High Energy) is performed in designated red areas locations or in Yellow areas where any of the following exist:

- Appreciable Combustibles or Flammables, in building construction or contents, are closer than the Applicable Distance (35 feet) to the point of Flame or Spark-Producing Hot Work, or
- Appreciable Combustibles of Flammables are more than the Applicable Distance (35 ft) away from the point of Flame or Spark Producing Hot Work, but may be easily ignited by sparks, or
- Wall or floor openings within the Applicable Distance (35 ft) expose Combustibles or Flammables in adjacent areas including concealed spaces in walls or floors, or
- Combustibles or Flammables are adjacent to the opposite side of metal partitions, walls, ceilings, or roofs and likely to be ignited by conduction or radiation.

Note1: More than one Fire Watch may be required depending on the nature of the work. The Permit Issuer will make this determination when issuing the permit for the Hot Work.

Note2: Some jobs, depending upon the complexity and location, may require that a BASF Operations Technician be present. This will be determined and noted on the permit by the Owning/Operating Supervision authorizing the permit.

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4. PROCEDURE (Continued)

4.5 Precautions for Flame or Spark Producing Hot Work (Continued)

4.5.4 Fire Watch (Continued)

4.5.4.2 Fire Watch Responsibilities

The primary function of the Fire Watch is the prevention of fire that may result from Flame or Spark Producing Hot Work. When a Fire Watch is deemed necessary, a Fire Watch Shall:

- Be trained and qualified as a Fire Watch.
- Have a properly checked/calibrated Combustible gas monitor on the job site and be trained on its use and limitations.
- Conduct air monitoring as stated on the permit upwind and near the point where Hot Work is being performed.
- Be in radio contact with the control room.
- Be equipped with a blast horn to provide warning to persons performing Hot Wok if emergency conditions arise.
- Must wear an orange vest identifying them as the Fire Watch.
- Be present in the area where Flame or Spark Producing Hot Work is occurring for the entire duration of the work and for at least a half hour after completion of the Hot Work activities to detect and extinguish possible smoldering fires.
- Be equipped with the proper firefighting equipment (e.g., portable fire extinguisher or water hose) and be trained on its use and limitations.
- Constantly observe for changing conditions, the presence of Combustibles or Flammables, spark/slag containment, and the recognition of any abnormal events which may affect the ongoing Flame or Spark Producing Hot Work.
- Have the responsibility and authority to immediately shut down the Hot Work if hazardous conditions are observed.
- Be briefed on the potential hazards of the area and be knowledgeable of the means to obtain assistance and the activation of emergency alarms and procedures.
- Must know how to shut off the gas supply or electric power to welding/burning/grinding machines.
- Must stop the job if conditions under which the permit was issued change, or sparks escape from the shielded areas.

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4. PROCEDURE (Continued)

4.6 Prior to Hot Work Activities

Prior to issuing a permit to perform Hot Work, the following items must be completed:

4.6.1 The work area shall be checked with a Combustible Gas monitor (LEL Monitor) to ensure that potential flammable atmospheres are not present.

4.6.2 Where practicable, Combustible materials shall be moved 35 feet from the Hot Work area or adequate measures taken to protect from ignition sources.

4.6.3 Where Combustibles are on the floor, the floor shall be swept clean for the Applicable Distance (35 ft) and the following criteria shall also be met:

- Combustible floors shall be kept wet, covered with damp sand, or protected by noncombustible or fire-retardant shields
- Where floors have been wet down, personnel operating arc-welding equipment or cutting equipment shall be protected from possible shock.

4.6.4 Hot Work that takes place on any process equipment must be isolated by one of the means listed below.

4.6.4.1 a double block and bleed

4.6.4.2 Disconnected with a sufficient air gap where sparks or gases and vapor cannot enter piping/equipment

4.6.4.3 Blinded to maintain the integrity of the isolation. Blinds shall meet the requirements for material of construction, size and thickness.

4.6.5 All lines/equipment in chemical service must be thoroughly cleaned and/or purged per Site operations procedures.

4.6.6 All lines or equipment must be isolated per Safety and Health Procedure Energy Isolation-Lock, Tag and Try.

4.6.7 A Tie-Point Tag must be attached to or within one foot on the line or equipment where the tie-in will be performed.

4.6.8 When Hotwork (high energy) activities generate sparks and slag in areas designated by owning/operating departments per site procedure as a RED area, a Fire Box shall be used. The Fire Box shall be large enough to allow for safe welding, burning and cutting activities and be designed to sufficiently contain sparks and slag. Fire Box coverings shall be composed of non-Combustible "fire-blankets" with junctures affixed to prevent escape of sparks and slag. Requirements for Fire Box usage and design in areas designated by owning/operating departments per site procedure as a YELLOW and Blue areas, should be evaluated at the time of request and on a case-by-case bases.

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4. PROCEDURE (Continued)

4.6 Prior to Hot Work Activities (Continued)

NOTE: Intent of Fire Box is to contain/control sparks and slag generated by hotwork activities to help prevent fire/explosion hazards when working in areas known to have flammables and/or combustibles. Appropriate precautions must also be in place to prevent eye and tissue damage caused by arc welding to all workers and bystanders that may or may-not be a part of the hotwork activities located in the area.

4.6.9 Ducts and conveyor systems that might carry sparks to distant combustible materials shall be suitably shielded or shut down or both.

4.6.10 Ditches, drains and vents must be covered or protected from sparks and slag. The fire-retardant tarps must be kept wet, and care should be taken not to allow gas pockets to form below the tarps.

4.6.11 Openings or cracks in walls or floors within 35 ft of the Flame or Spark Producing Hot Work location shall be tightly covered with fire-retardant or noncombustible material to prevent the passage of sparks to adjacent areas.

4.6.12 If Flame or Spark Producing Hot Work is done near walls, partitions, ceilings, or roofs of combustible construction, fire-retardant shields or guards shall be provided to prevent ignition.

4.6.13 If Flame or Spark Producing Hot Work is done on one side of a metal wall, partition, ceiling, or roof, one of the following criteria shall be met.

- Precautions shall be taken to prevent ignition of Combustibles or Flammables on the other side by relocating the materials.
- If it is impractical to relocate materials, a Fire Watch shall be provided on the side opposite from where the work is being performed.

4.6.14 Flame or Spark Producing Hot Work shall not be attempted on a metal partition, wall, ceiling or roof having a combustible covering or insulation, or on walls or partitions of combustible sandwich-type construction.

4.6.15 Flame or Spark Producing Hot Work that is performed on pipes or other metal that is in contact with Combustible walls, partitions, ceilings, roofs, or other combustibles, shall not be undertaken if the work is close enough to cause ignition by conduction.

4.6.16 Hot Work areas shall be adequately barricaded to safeguard personnel against falling sparks and slag.

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4. PROCEDURE (Continued)

4.6 Prior to Hot Work Activities (Continued)

4.6.17 Any special precautions related to the Hot Work will be noted on the permit and will be communicated verbally to the Work Crew.

4.7 Precautions for Flame or Spark Producing Hot Work on the Outside of Containers

4.7.1 Before beginning Flame or Spark Producing Hot Work on a container, all pipe lines or connections to the Container shall be isolated. Isolation shall consist of one or more of the following methods:

- A blank or stopper plate inserted in the line. Blanks must be of the construction and thickness to sustain the pressure for which the line is rated.
- Double block and bleed valve arrangement where the two block valves are closed and the bleed, in between, is opened and secured by locks/tags.
- Lines are disconnected and misaligned from the Container.
- If one of the isolation methods in 4.6.4 cannot be accomplished, a documented risk assessment must be done before isolation. N-G-PI 306 or other industry accepted practice may be used.

4.7.2 No Flame or Spark Producing Hot Work shall be performed on the outside of Containers that have previously contained Flammables or greases, tars, or other materials that when subjected to heat might produce Flammable vapors until they have been cleaned so thoroughly as to make absolutely certain there are no Flammables present.

4.7.3 Process vessels that contain packing, catalysts, or trays, etc. may need special precautions (e.g., remove the material, inert the vessel, or submerge the material in water) to ensure materials inside the vessel do not ignite.

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4. PROCEDURE (Continued)

4.7 Precautions for Flame or Spark Producing Hot Work on the Outside of Containers (Continued)

4.7.4 When Flame or Spark Producing Hot Work is performed on the outside of Containers, continuous LEL monitoring shall be conducted outside and inside the Container (may need to account for stratification of gasses) prior to the start of and during the Hot Work activity.

The following exceptions may be applied to continuous LEL monitoring inside a container:

- When the job plan requires inerting with nitrogen or other inert gas,
- During the final weld to close container,
- When the container has not been previously connected to a process or coated with materials that may become volatile when heated,
- When the container has only been used for a Utility

4.7.5 When the Container previously contained substances which when subjected to heat might produce toxic vapors (refer to safety data sheet for decomposition products), the Permit Issuer must determine appropriate safeguards. For example, depending on the nature of the work, specific materials involved, or ventilation equipment, chemical specific monitoring or additional personal protective equipment may be needed during the course of the work to ensure protection of personnel.

4.7.6 Verify Internal Components of any vessel involved in Hot Work.

4.7.7 All hollow spaces, cavities, or containers shall be vented to protect against overpressure due to thermal expansion before preheating, cutting or welding, consider potential hazards in vent path.

4.8 Precautions for Flame or Spark Producing Hot Work inside Containers

4.8.1 See also Beaumont Site Confined Space Procedure BMEHS-002.003

Follow requirements for 4.7, Precautions for Flame or Spark Producing Hot Work on the Outside of Containers

4.8.2 In order to eliminate the possibility of gas escaping through leaks or improperly closed valves, when gas welding or cutting, the torch valves shall be closed and the gas supply to the torch positively shut off at some point outside the confined area whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight. Where practicable, the torch and hose shall also be removed from the confined space.

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4. PROCEDURE (Continued)

4.9 Vehicle Entry

4.9.1 Vehicle Entry is considered a Low Energy Ignition Source Hot Work. The entry requirements will be determined by the area classification for which the vehicle is permitted. (See Table 3.1).

4.9.1.1 An initial atmospheric check is required where the vehicle will be operated.
4.9.1.2 Blue Areas and plant roads outside of process areas containing flammable materials do not require a Vehicle Entry permit.

4.9.2 When required, the Safe Work permit shall be marked as Hot Work and Vehicle Entry.

4.9.3 Multiple vehicles used for the same job/task that are operating in close proximity to each other may be covered under the same Vehicle Entry permit. Each vehicle shall be listed on the Safe Work Permit.

4.9.4 When welding, the welding machine is part of the Hot Work task and does not need a Vehicle Entry permit as long as the job is permitted as Hot Work.

4.10 Permit Requirements

4.10.1 Permit Issuance

4.10.1.1 The Owning/Operating Department shall issue the permit for the area where the work will be performed.

4.10.1.2 The Operations Technician issuing the permit must conduct a field check of the area to ensure that all items in Section 4.3 have been satisfied.

4.10.1.3 The Permit Issuer must be a different individual than the individual performing the Hot Work activity.

4.10.1.4 A permit to perform Hot Work does not authorize smoking in an area where smoking is otherwise prohibited.

4.10.2 Permit Authorization

4.10.2.1 Permits designated as High Energy Ignition Sources-Hot Work, i.e. Welding, Cutting, Brazing, Grinding shall be approved by Owning/Operating Supervision and shall have another area authorized permit writer perform a 4 eyes review with the permit approver.
in section IX - Hot Work Requirements of the permit.

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4. PROCEDURE (Continued)

4.10 Permit Requirements (Continued)

4.10.2 Permit Authorization (Continued)

4.10.2.2 Permits designated as Low Energy Ignition Sources-Hot Work i.e. non-classified electrical equipment and vehicle entry, may be approved by the Owning/Operating Technician permit issuer.

4.10.3 Permit Accessibility

4.10.3.1 The Work Crew representative receiving the permit must also approve the permit and communicate the information on the permit to the work crew before work begins.

4.10.3.2 The field copy of the permit shall be available at the job site for the duration of the job.

4.10.3.3 The permit shall be placed in a plastic bag and posted at the job site.

4.10.4 Job Survey

4.10.4.1 A qualified Owning/Operating Technician may be required by the shift supervisor to survey the job every two hours when a high-risk hot work job is taking place.

4.10.4.2 The Technician shall initial and note the monitoring results on the job site copy of the permit to indicate the job has been surveyed.

4.10.5 Permit Content

4.10.5.1 The permits must be printed and legible and include the date and times that the work may proceed.

4.10.5.2 The Location: Include the area name/number of the large equipment in the area.

4.10.5.3 A Job Description: Provide a brief description of the work to be conducted including tools that will be used. See the definition of Hot Work in Section 2.

4.10.5.4 Equipment Preparation: Note that equipment has been properly prepared and include description of how equipment was isolated. A sketch or diagram may be used. Initial atmospheric tests must be documented.

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4. PROCEDURE (Continued)

4.10 Permit Requirements (Continued)

4.10.5 Permit Content (Continued)

4.10.5.5 Precautions Taken Prior to Hot Work: For each item note that the particular precaution was taken, or that it is not applicable. See Section 4.6 for additional information regarding tasks that must be completed prior to Hot Work.

4.10.5.6 Additional Precautions: Include any other additional or special precautions that must be included.

4.10.5.7 Approvals: The approval process will vary based on the requirements in this procedure. The applicable approvals will be recorded in the appropriate location on the permit.

4.10.6 Permit Duration / Revalidation

4.10.6.1 Normally, the Hot Work permit must be Re-issued when there is a shift change of the Owning/Operating Department or crew performing the Hot Work.

4.10.6.2 If the crew performing the Hot Work is required to work into the next operating shift, the permit may be Re-validated in lieu of re-issuing.

4.10.6.3 To Re-validate the Hot Work permit, an on-coming Owning/Operating Department Technician must visit the job site immediately following shift change (4 Eyes Principle) and may extend the permit for up to 2 additional hours provided the original permit conditions are still valid. Failure to Re-validate at shift change requires that the permit be Re-issued.

4.10.6.4 For permit re-validations, the Owning/Operating Supervision, and the Work Crew representative must all approve the permit in section XI – Revalidation of the Safe Work Permit.

4.10.6.5 Permits issues for Hot Work must also be Re-validated if there is a break in work resulting in the absence of a designated Fire Watch (i.e. >30minutes).

4.10.6.6 If the scope (specific job) or type of Hot Work (Flame or Spark Producing vs. Non-rated Electrical Equipment) changes, a new permit must be issued.

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4. PROCEDURE (Continued)

4.10 Permit Requirements (Continued)

4.10.7 Permit and Emergency Conditions

4.10.7.1 If, during the course of Hot Work, an emergency alarm is sounded, or an emergency condition occurs, equipment involved in the Hot Work (drills, welding equipment, etc.) shall be shut down, and permits will be automatically and immediately voided.

4.10.7.2 After the emergency has been resolved, the area must be re-issued or re-validated using the 4-Eyes Principle and obtaining approval signatures before Hot Work can be continued.

4.10.8 Closing Out the Safe Work Permit

4.10.8.1 Upon completion of the task or the end of the day, the job site shall be cleaned, and the permit shall be returned to Owning/Operating department.

4.10.8.2 Section X Closeout portion of the permit shall be closed out by reviewing the status of the work and discussing any hazards encountered or left in the workplace. The Safe Work Permit will then be signed off by a Work Crew Representative and the Owning/Operating Department indicating that the work is complete.

4.10.8.3 Where conditions exist as described in 4.2.4, other Owning/Operating Departments must be notified the permit has been closed out.

4.11 Permit

A. All closed high-energy (only) Hot Work Permits and ALL associated paperwork for isolations, etc. shall be retained for a minimum of 3 years.

B. When an incident occurs during Hot Work activities, the hot work permit issued for that job shall be added electronically to the incident report.

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4. PROCEDURE (Continued)

4.12 Hot Work on Equipment Moved to Welding Areas

Any pipe, vessel or equipment that has been removed from a process for Hot Work must be cleaned prior to Hot Work. Operations will be responsible for thoroughly cleaning the equipment prior to removal, verifying that the equipment has been cleaned.

4.13 Other Special Precautions

4.13.1 Ignitable Scale Deposits

Special considerations should be given to conditions involving ignitable scale deposits, waxes, and other deposits that can accumulate on surfaces of vessels and piping and go undetected by air monitoring equipment until heated.

4.13.2 Pyrophoric Deposits

When pyrophoric deposits, such as iron sulfide, are located in vessels, special precautions must be taken to prevent the spontaneous combustion of these materials when they are allowed to dry out and react with the oxygen of the air. The control of this reaction process can be attained by dissipating the heat involved until the atmosphere inside the vessel is below the LEL or by isolating the deposits from oxygen. The use of water spray in this operation will accomplish both objectives by reducing the heat of the reaction and by helping to isolate the pyrophoric deposits from the oxygen present during the vapor-freeing procedures.

4.14 Construction Site Procedures

These shall be handled on a case-by-case basis with prior approvals from the affected OM, the HS Manager and the TES Manager - Maintenance. In general:

4.14.1 If the construction takes place more than 100 ft from equipment containing combustible or flammable liquids and/or gases, no hot work permit is required.

4.14.2 If the construction takes place < 100 ft from equipment containing combustible or flammable liquids and/or gases, one permit may be issued for all hot work. All other requirements of this procedure must be met.

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4. PROCEDURE (Continued)

4.15 Program Review - Recordkeeping and Inspection program

4.15.1 The Shift Supervisor/Team Lead will review completed/closed permits for discrepancies and communicate the discrepancies with the permit issuer.

4.15.2 All "high-energy" (only) Hot Work Permits, along with their associated Isolation Procedures, Lock Out/Tag Out Sheets, excavation permits, etc., issued to a Work Crew shall be filed and retained for a minimum of 3 years.

4.15.3 At least annually Owning/Operating Department Supervision will conduct a review of this program to ensure that the procedures and the requirements of the standard are being followed. This review will be conducted by inspecting actual procedures in the field and reviewing them with the employees who are following them. Any deficiencies uncovered by these inspections will be corrected and all affected personnel will be trained as necessary.

4.15.3.1 As a minimum, the following elements of the Hot Work management system shall be included in the review:

4.15.3.1.1 A review the site procedure and site permit to ensure all elements required by the corporate Hot Work procedure, N-ID-OSA 016, are included.

4.15.3.1.2 A review of all incidents and other nonconformance reports involving Hot Work activities that have occurred since the last Hot Work management system review to ensure root causes have been properly identified and appropriate corrective actions have been implemented.

4.15.3.1.3 Inspection of at least one Flame- or Spark-Producing Hot Work job-in-progress to verify site practices comply with the site procedure and personnel involved with the job-in-progress received applicable training.

4.15.3.1.4 Verification of the training personnel involved in this job-in-progress received.

4.15.3.1.5 Interviews with a representative number of Permit Issuers, persons performing Hot Work, and other affected employees,

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4. PROCEDURE (Continued)

4.15 Program Review - Recordkeeping and Inspection program (Continued)

4.15.3.1.6 including Contractor and Contracted Employees where applicable, to verify they understand their role/responsibility.

4.15.3.1.7 A review of applicable equipment and instrument records to ensure calibration and maintenance are performed.

4.15.3.1.8 Use the Hot Work Management Review Checklist in Attachment D to document the review.

5. TRAINING

5.1 BASF and Contracted Employees Involved in Hot Work Activities

5.1.1 Permit Issuers and personnel performing Hot Work shall receive training on how to recognize the applicability of Hot Work situations, the requirements for issuing a permit, and the necessary means to safeguard against the hazards posed during these activities.

5.1.2 Training shall be delivered in accordance with the EHS curriculum assignment process.

5.1.3 Retraining of an individual is required whenever:

5.1.3.1 Deviations or inadequacies in an individual's performance of an applicable procedure indicate that lack of knowledge is a cause.

5.1.3.2 An applicable procedure has been changed.

5.2 BASF and Contingent Employees not directly involved in Hot Work

5.2.1 Shall receive awareness training for this and other safe work practices in accordance with the EHS curriculum assignment process.

5.3 Training Documentation for BASF and Contracted Employees

5.3.1 Training must be documented, including all of the following:

5.3.1.1 Each trainee's name,

5.3.1.2 Date(s) of attendance,

5.3.1.3 Means used to verify understanding,

5.3.1.4 Learning Objective(s) for the course

5.3.2 Documentation shall be maintained according to BC037, Record Retention Policy and the applicable record retention schedule.

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5. Training (Continued)

5.4 Contractor Employees shall be trained in accordance with N-ID-OSA 002, Contractor EHS Management for training requirements.

5.5 Personnel Involved in Hot Work Activities
Employees directly involved with hot work activities will receive training to recognize the hazards of hot work and the appropriate means to safeguard against the hazards.

5.6 Personnel Not Directly Involved in Hot Work Activities
Employees who do not directly perform hot work will receive instruction concerning their roles in the procedure and how hot work may affect their specific work duties.

5.7 Frequency
Training shall be conducted during employee orientation and at least every three years after that.

6. RESPONSIBILITIES

6.1 Site Manager

The Site Manager has responsibility for:

6.1.1 Implement this procedure
6.1.2 Ensure adherence to the site procedure on a daily basis

6.2 Owning/Operating Department Management

The Owning/Operating Department has responsibility for:

6.2.1 Designating in writing Hot Work Permit Issuers for Hot Work performed in the respective unit/department.
6.2.2 Ensuring applicable employees and Contracted employees are trained.
6.2.3 Participating in the program review described in 4.15
6.2.4 Responsible for developing and posting an area classification (Red, yellow, blue) map in the control room or designated posting areas.

6.3 Site Safety Specialist

Has the primary responsibility for administration, and interpretation of this procedure.

6.4 Site Employees and Contractors

Have primary responsibility for adherence to procedure including identifying deficiencies in the procedure and identifying, reporting, and correcting activities not in compliance with the procedure.

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7. RELATED DOCUMENTS

OSHA 29 CFR 1910.252
BASF Corporate Procedure N-ID-OSA-016 (Hot Work)
Beaumont Site Procedure: Safe Work
Beaumont Site Procedure: Line Breaking BMEHS-002.020
Beaumont Site Procedure: Energy Isolation - Lock Tag & Try BMEHS-002.005
Beaumont Site Safe Work Permit BMEHS-002.026
Attachments A - E

Attachment A – Hot Work Inspection Form

Attachment B – Roles and Responsibilities for Hot Work

Attachment C - Electric Equipment Decision Tree

Attachment D – Hot Work Management System Review Checklist

Attachment E – Beaumont Site Hot Work Map

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