

Gulfof**Mexico**



Operations: HSE

**Transportation of Hazardous Materials Safe
Work Practice (SWP)**

AMENDMENT RECORD

Amendment Date	Revision Number	Amender Initials	Amendment
03/01/17	6	MB	<p>Added following section 4.3</p> <p>9. Safety Data Sheet(s) (SDS) shall accompany all hazardous material shipments.</p> <p>Changed all references of MSDS to SDS</p> <p>Updated footer Revision date 03/01/17</p>
08/15/12	5	CL	Reformatted document to meet new GoM document control template standardization guidelines.
04/08/12	4	CL	<p>Purpose Scope – changed Business Unit verbiage to Region.</p> <p>Changed HSE Advisor references to HS Site Lead throughout document</p> <p>Deleted GOM Operations Guidelines for Offshore Support Vessels from Key Documents links that is no longer in the system.</p>
05/01/09	3	RK	Section D.6, Marine Transfer of Oil and Hazardous Substances, 3 rd paragraph, starting with “Oil and hazardous substance transfer hoses...”, 2 nd sentence, delete “after assembly by the supplier and prior to installation offshore” and end the sentence. Add another sentence stating “These hoses should be inspected/leak tested prior to each offload of hazardous product at the offshore facility to verify integrity.
06/01/08	2	RK	<p>New chapter added to the revised SPM</p> <p>Provides an overview for the following requirements:</p> <ul style="list-style-type: none"> - Appropriate packaging and containers - Labels and placards - Shipping papers - Emergency response information - HAZMAT Employee training <p>Marine transfer of oil and hazardous substances</p>
03/16/06	1	EP	<ul style="list-style-type: none"> - Added HAZMAT Employer and HAZMAT employee to definitions; modified most of the definitions; Added wording to the general requirements section of the document; Modified

			6.0-1 Table; changed CD # from 10079 to UPS-US-SW-GOM-HSE-DOC-00135-2 to conform to new numbering nomenclature inside of the new GoM HSSE doc base; Changed 3 authorities and 1 custodian.
02/06/02	0	RB	Initial issue as controlled document. Prior revision history located in hard-copy consolidated manual.

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1 Purpose/Scope

This Safe Work Practice (SWP) provides a brief overview of the requirements regarding the Transportation of Hazardous Materials. It shall be used in conjunction with the BP GoM Waste Management Procedures and Title 49 of the Code of Federal Regulations. Contact your Department of Transportation (DOT) Specialist or the Environmental Coordinator in your Region for questions on hazardous materials transportation.

2 Key Responsibilities

All personnel associated with the transport of hazardous materials.

3 General Requirements

The DOT lists the substances that may pose a danger during transportation in the hazardous material Table at 49 CFR 172.101. This table is the starting point for identifying specific regulatory requirements associated with the transportation of a particular substance.

The DOT has very detailed regulations pertaining to the transportation of hazardous materials, which are found in 49 CFR Parts 171-180. These regulations address:

- Appropriate packaging and containers
- Labels and placards
- Shipping Papers
- Emergency Response Information
- HAZMAT employee training

In order to facilitate compliance with the DOT regulations, personnel directly involved in hazardous materials transportation safety shall receive training as HAZMAT employees in accordance with 49 CFR Part 172, Subpart H.

4 Overview

4.1 Appropriate Packaging and Containers

DOT approved packaging and containers (e.g., drums, barrels, tanks), meeting original design specifications, shall be used when transporting hazardous materials.

4.2 Labels and Placards

Packages and containers of hazardous materials shall be marked with labels and placards to indicate their contents.

Placards are large, brightly colored diamond shaped signs that are applied to all four sides of bulk shipments of hazardous materials. In general, placards show a symbol at the top indicating the type of hazard, a number at the bottom that indicates the DOT Hazard Class, and a description of the hazard ("Flammable"), or the UN Chemical ID Number in the middle.

Labels are similar to placards, but they are smaller and do not usually have the UN Chemical ID Number printed on them. Labels are used on non-bulk shipments of individual packages. The UN Chemical ID Number shall be written on the package near the Label.

4.3 Shipping Papers

A shipping paper shall accompany a hazardous material shipment. A shipping paper shall minimally include the following eight items:

1. **Proper Shipping Name** - The DOT name for the product, as found in Column 2 of the Hazardous Materials Table
2. **Hazard Class** - The general hazard category assigned to the substance, as found in Column 3 of the Hazardous Materials Table.
3. **UN/NA Identification Number** - The UN standard reference number for the substance, as found in Column 3A of the Hazardous Materials Table.
4. **Packing Group** - The Packing Group number, as found in Column 5 of the Hazardous Materials Table
5. **Total Quantity** - The weight or volume, as appropriate, for each Hazardous Material being transported.
6. **Shipper's Certification** - A certification signed by a representative of the shipper which states, "This is to certify that the above named materials are properly classified, described, packaged, marked, labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation".
7. **Emergency Response Telephone Number** - A telephone number monitored at all times by a person knowledgeable in the characteristics of the hazardous material.
8. For hazardous wastes, the shipment shall also include a uniform hazardous waste manifest which will be prepared in advance and coordinated by the GoM Waste Specialist.
9. **Safety Data Sheet(s) (SDS)** shall accompany all hazardous material shipments.

4.4 Emergency Response Information

Emergency Response Information shall accompany a shipment of hazardous materials. Since it is intended to be used in emergencies, the information shall be kept on the vehicle away from the hazardous material being transported.

Regardless of the format, the Emergency Response Information shall include:

- The basic description and technical name of the Hazardous Material,
- Immediate hazards to health,
- Risks of fire or explosion,
- Immediate precautions to be taken in the event of an accident or incident,
- Immediate methods for handling fires,
- Initial methods for handling spills or leaks in the absence of fire, and
- Preliminary first aid measures.

NOTE: Emergency Response Information may be provided using the Emergency Response Guide Book, information included on the Shipping Papers, or an [SDS](#).

4.5 HAZMAT Employee Training

A HAZMAT employee is a person who directly affects hazardous materials transportation safety. Typical duties performed by HAZMAT employees include:

- Loading, unloading, and handling of hazardous materials,
- Manifesting, labeling, and placarding drums, or packaging as qualified for use in the transportation of hazardous materials,
- Preparing hazardous materials for transportation,
- Responsible for the safety of transporting hazardous materials, and
- Operating a vehicle used to transport hazardous materials

The DOT requires that HAZMAT employees be knowledgeable in the safety requirements associated with their duties. Training shall include general awareness components, function specific components as identified for roles and responsibilities, and general security awareness components. Additional personal safety and security training will be provided for personnel assigned specific roles.

NOTE: HAZMAT employees shall be trained initially and thereafter every three years for shipping by boat or land and every two years if shipping by air.

4.6 Marine Transfer of Oil and Hazardous Substances

Operations involving marine transfer of oil and hazardous substances shall comply with applicable governmental rules and regulations.

A material is considered oil or a hazardous substance if it meets specific criteria as defined by the EPA and the U. S. Coast Guard (USCG). Examples of oil are diesel fuel and oil-based drilling fluids. An example of a hazardous substance is zinc bromide.

Oil and hazardous substance transfer hoses shall be marked with an identifier and records shall be kept, including hose purchase date, pressure test dates (include certificates/test charts), and manufacturer/distributor information. Pressure tests shall be performed at 1½ times the maximum allowable working pressure. These hoses should be inspected/leak tested prior to each offload of hazardous product at the offshore facility to verify integrity.

NOTE: USCG regulations require that facilities with a capacity greater than 250 barrels of oil will have all hoses pressure tested annually at 1½ times the maximum allowable working pressure.

Requirements of hose use during transfer are as follows:

- All reasonable efforts shall be made to minimize the number of hose sections used. Preferably only one section, of proper length, should be used.
- Hoses shall be constructed using built-in or swaged fittings, when possible
- Loads on hoses during transfers shall be kept to a minimum
- Repaired or altered hoses shall not be used for transfer of oil and hazardous substances unless specifically approved by the BP representative
- Hoses shall be visually inspected, maintained, and stored properly
- Hoses shall be secured and lowered down to the vessel using polypro or nylon straps. Manila rope is not recommended due to rotting and wear, which is difficult to identify.

All personnel involved in the operation shall have the proper instruction in standard loading/unloading procedures, hazards of materials and equipment, and emergency procedures. SDSs shall be readily available for all materials transferred.

NOTE: USCG regulations (46 CFR Chapter 1) require a Declaration of Inspection to be completed for transfers of oil or Hazardous Materials over 250 barrels.

Before a transfer begins, verbal authorization shall be given by the BP representative. Prior to authorization, the following items shall be inspected by the BP representative:

- Hoses, ropes, connections, and boat orientation in relation to current and weather conditions,
- Pumps, tanks, valves, alarms, gauges and other equipment,
- Communications equipment (i.e., radios),
- SDS for materials transferred,
- Emergency shutdown stations/switches,
- Emergency equipment (i.e., fire extinguishers), and
- Personal Protective Equipment.

Marine transfer of hazardous substances shall only be performed in daylight hours, unless specific approval has been given by the BP representative.

Personnel performing the transfer both on the platform and on the boat shall have radios. There shall also be a separate person with a radio assigned to watch the Hazardous Material transfer hose during the transfer. This person will have no other duties.

Marine transfers of hazardous substances shall not be permitted during rough seas. Monitoring of weather conditions is the responsibility of the BP representative and/or the motor vessel captain.

During diesel transfers only, supply boats on long-term contract to BP shall be equipped with high and low-pressure alarms at the pump discharge to warn personnel of a change in pressure.

Marine transfer of oil and hazardous substances shall be halted upon any sign of leakage or discharge into the environment.

Tank levels shall be continuously monitored during the transfer operation.

5 Definitions

Hazardous Material	A substance or material determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety and property when transported in commerce, and which has been so designated under Federal Hazardous Material transportation law The Department of Transportation (DOT) publishes a table of Hazardous Materials in 49 CFR 172.101. Contact the location HS Site Lead or the asset EMS coordinator for further clarifications. Consult the GoM DOT Coordinator to resolve questions prior to classifying hazardous material.
HAZMAT Employer	A company who uses one or more of its employees in connection with: <ul style="list-style-type: none"> • Transportation of Hazardous Materials in commerce • Causing Hazardous Materials to be shipped or transported in commerce • Representing, marking, certifying, selling, offering, manufacturing, reconditioning, testing, repairing, or modifying containers, drums, or packaging as qualified for use in the transportation of hazardous materials.
HAZMAT Employee	A person who is employed by a HAZMAT Employer and who, in the course of

	employment, directly affects Hazardous Materials transportation safety
Hazardous Substances	<p>A substance that has a Reportable Quantity (RQ) limit as listed in Appendix A of 49 CFR 172.101. The RQ limit is the amount of hazardous substance which, if released, requires the notification of federal agencies</p> <p>The hazardous substance classification does not apply to petroleum products that are in the process of being used as lubricants or fuels, or to natural gas, LNG, or synthetic gas usable for fuel. For example, the gasoline in a vehicle's fuel tank is exempt from these requirements</p>
Hazardous Waste	<p>Any material that is subject to the Hazardous Waste Manifest requirements of the Environmental Protection Agency (EPA) as specified in 40 CFR Part 262</p> <p>Consult the GoM Waste Specialists or your asset EMS coordinator to resolve any questions prior to classifying a material as hazardous waste</p>

6 Key Documents

[Department of Transportation; 49 CFR various sections including but not limited to Parts 100-179, 391-397](#)

[USAG 30 CFR](#)

[EPA 40 CFR 262](#)

[46 CFR Chapter 1](#)