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Doc Custodian: Adv HES Professional		Safety
Approved By: Safety Supervisor		
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Stop Work Authority and Obligation Program

Purpose

The purpose of this standard is to maintain a safe work environment and establish the authority, obligation and responsibility for employees or contractors to identify and report an unsafe work environment. The Occupational Safety and Health Act of 1970 regulates working conditions for occupational safety and health to achieve a safe and healthy workplace. Through this act, Los Angeles Refinery (LAR) is required to provide working conditions that are free from recognized hazards likely to cause death or serious physical harm.

Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1960, 29 CFR 1910 and T8, 5198.1 ensure that employee or contractors may stop work temporarily or decline to perform work that they believe endangers their safety or health, or that of other workers or members of the public, or that places LAR property, system reliability, or the environment at risk, hence a worker may temporarily stop work for safety concerns without fear of reprisal. This includes the authority and obligation of an employee or contractor to refuse to perform a task where doing so could reasonably result in death or serious physical harm, as well as the authority and obligation to recommend to the operator in charge of the unit that an operation or process be partially or complete shutdown based on a process safety hazard.

Scope

This standard covers all employees and contractors at Marathon Los Angeles Refinery (Carson, Wilmington, Watson Cogen, and Sulfur Recovery Plant).

Records Retention

Printed copies of this document should not be retained for more than 12 months. Any revision to this document will be retained a maximum of 10 years following the revision.

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1.0 References

1.1 Refining References

The table below lists the Refining references used with this document.

Number	Description
	Marathon Safety Principles
	Marathon Tenets of Operation
Operating Standing Instruction O-082	Authority to Stabilize, Slowdown, Shutdown, & Restart Operating Units
RSP 1128	Safe Work Permit
HSS 201	Safe Work Permit

1.2 Regulatory References

The table below lists the regulatory references used with this document.

Number	Description
OSH Act of 1970, Section 5(a)(1)	Workers' Right to Refuse Dangerous Work
1910.119	Employee Participation-CPL
1926.1418	Authority to Stop Operation
T8, 5189.1, (q) (5) (A)	Employee Participation-Effective Stop Work procedures

1.3 Terms

The following terms are used in this document:

Reference: For details, see [Appendix A: Terms and Definitions](#).

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2.0 Roles and Responsibilities

There should not be any delay in calling for a temporary work stoppage if the need arises. Work that has been stopped shall not be resumed until all safety aspects are resolved.

2.1 All Employees and Contractors

- 2.1.1 Have the responsibility, authority and obligation to stop work or decline to perform an assigned task without fear of reprisal to discuss and resolve unsafe work and safety concerns. The Stop Work Authority and Obligation (i.e., SWAO) shall include discussions with co-workers and supervision (and safety representative when applicable) to resolve work-related issues or address potential unsafe conditions.
 - 2.1.2 Have the responsibility, authority and obligation to report any work task or condition the employee believes is unsafe or for which they have initiated a Stop Work. Notification should be made to:
 - a. The affected worker(s),
 - b. Permit Issuer, and
 - c. The field supervision assigned to the location where the unsafe activity or condition exists.
 - 2.1.3 Have the responsibility, authority and obligation to notify their own supervisor (e.g. project supervisor etc.) if a Stop Work issue has not been resolved prior to the resumption of work. Employees can also contact their safety representative with a concern or to help initiate a SWAO process.
-

2.2 Circumstances

- 2.2.1 **Attachment A: [Examples of Stop Work Authority and Obligation](#)** may include:
 - a. Unsafe Acts
 - b. Unsafe Conditions
 - c. When incidents occur
 - d. Emergency Situations
 - e. Alarms sound
 - f. Change in conditions
 - g. Change in work plans
 - h. Confusion or failure to understand any part of the job/task
 - i. Anytime someone perceives a situation to be at risk
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**2.3
Communication**

2.3.1 Every person’s Authority and Obligation to Stop Work should be communicated during:

- a. New Hire Training
- b. Pre –Job meetings
- c. Contractor engagements
- d. Location specific orientations
- e. Permit issuing process
- f. While performing the job/task
- g. Any other medium where Health, Safety, Reliability, Efficiency and Environmental expectations are established and communicated

**2.4 Adverse
action for
exercising
SWAO.**

2.4.1 All employees and contractors have the authority and obligation to immediately initiate a temporary work stoppage without fear of retaliation or reprisal, hence there shall be no blame placed upon any employee or contractor for calling for a Stop Work order, even if, upon investigation, the Stop Work order was deemed unnecessary.

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3.0 Stop Work Authority Process

3.1 Application

- 3.1.1 All Employees (i.e., MPC employees and contractors) are expected to always use SWAO in a positive and respectful manner.
- 3.1.2 An example of what that looks like is the following:
- a. The employee would use a phrase such as “***I am using my Stop Work Obligation because...***” Using this type of phrasing will clarify the users’ intent and set the expectations as detailed in the process section of this standard.
 - b. If necessary, stop associated work activities and remove person(s) from the affected area, stabilize the situation, and make the area as safe and secure as possible.

Note: All employees, including employees of contractors, have the right to anonymously report hazards, LAR provides the Hazard Reports Form access via Share Point.

3.2 SWAO Process Steps for Employees

- 3.2.1 **STOP** all unsafe activity or conditions. All related work shall be suspended.
- a. This includes any issued work permits authorized for the work in question shall be immediately suspended until proper resolution is achieved.
- 3.2.2 Immediately notify supervision.
- 3.2.3 The hazardous condition identified should be mitigated if practical and communicated to all affected personnel (e.g., Equipment Owners, Craft persons) so that all parties are aware of the existence of the hazardous condition.
- 3.2.4 Ensure all initiated SWAO are captured within FAST Audit under “**Stop Work Moment**” by the employee who initiated the SWAO by the end of the shift it occurred.
- 3.2.5 Resolve issues (regarding identified unsafe activities etc.), and resume work as agreed upon.
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**3.3 SWAO
Process Steps
for Supervision**

- 3.3.1 Positive feedback should be given to all employees who report an unsafe condition and initiate a temporary work stoppage using SWAO.
 - a. Under no circumstances will retribution be directed at any person(s) who exercised, in good faith, their SWAO as detailed in this safety standard.
- 3.3.2 Involve the right people (i.e., get subject matter expert/s involved when applicable).
 - a. Unsafe activities will be assessed by supervision (and subject matter expert/s as needed).
- 3.3.3 When opinions differ regarding the validity or the potential mitigation of the SWAO, increasing layers of supervision and employee participation will be included as needed, consulting with involved personnel.
 - a. For process related situations, communicate the use of Stop Work Obligation to the Day Foreman and Area Team Lead, and if necessary, the Refinery Shift Superintendent (RSS).
- 3.3.4 If the differing opinions cannot be resolved, supervision shall elevate the issue to the attention of the Refinery Leadership Team for resolution. If necessary, the Refinery Manager or designee will make the final determination on the path forward.

**3.4 SWAO
Process Steps
for Leadership**

- 3.4.1 Periodically review all instances of formal use of a SWAO to ensure a positive culture exists, with no retribution for those who initiated it.
- 3.4.2 As necessary, encourage an investigation to the situation that led to why a SWAO was invoked.

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3.5 Resuming Work

- 3.5.1 Once the SWAO activity or condition has been resolved:
- a. Discussions regarding resumption of work should include a discussion between the individual who originated the temporary stop work and the affected workers, at a minimum. Layers of supervision shall be informed as appropriate.
- 3.5.2 Additional actions may be required, depending on the specific circumstances. Available resources can include:
- a. Discussion with permit issuer/cosigner regarding conditions on permitted work.
 - b. Review of permitting support documents (e.g., both Safe Work Permit Form, i.e., SWP forms *that do and do not require approvals* and the Permitted Task List), applicable standards, policies and standing instructions. (Tenet #4 “Always follow safe work practices and procedures”).
 - c. Inclusion of subject matter experts such as Safety, Environmental, Inspection or Engineering Departments.
 - d. Stop Work Order resolution shall be communicated to the individual who stopped the work even if they are not involved in the resolution discussion.

3.6 Reporting

- 3.6.1 All formal SWAO interventions shall be reported using the methods described below to document lessons learned and ensure any corrective actions are tracked and worked to closure.
- a. F.A.S.T. Audit (under “Stop Work Moment” tab), all initial temporary work stoppages
- 3.6.2 All escalated SWAO, i.e., when opinions differ regarding the validity or the potential mitigation of [the SWAO](#), will follow [section 3.0 Stop Work Authority Process](#) of this document, see [Stop Work Intervention Process Flow Chart](#).
- 3.6.3 For PSM related Stop Work, the affected Area Team Lead (ATL) or Refinery Shift Supervisor (RSS/501) shall investigate the situation to fully understand what were the circumstances (i.e., reasons) that lead to the initial temporary work stoppage. Investigation should include the USW Process Safety Representative for consistency.

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3.6.4 SWAO events and investigation finding should be reviewed by the JHSC to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learning.

3.7 Recognition

3.7.1 Supervisors and Leadership are encouraged to positively recognize employee and/or contractor participation in the program.

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Appendix A: Terms and Definitions


Term	Description
Unsafe Work Condition	Any condition or practice that could reasonably be expected to be hazardous, serious injury, environmental harm or cause death.
Stop Work Authority	An immediate, temporary work stoppage authorizing and obligating workers to stop work, without fear of reprisal, when they believe a situation exists that place themselves, a coworker(s), or the environment in imminent danger

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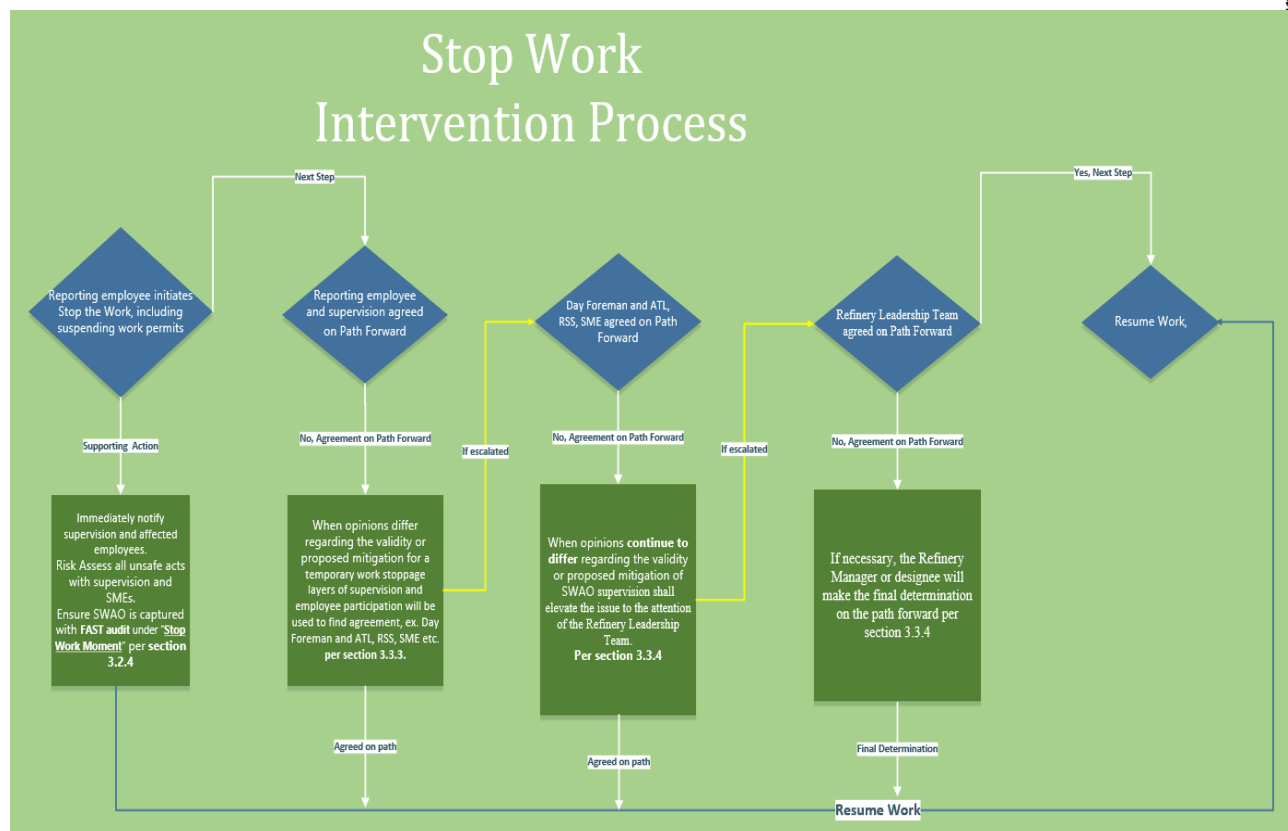
Appendix B: Examples of Stop Work Authority Use

Scenario A	During a turnaround, Contractors assigned to blind a flare system noticed that Marathon’s isolation plan did not meet their company’s written standard for flare work.
Action	The Contractors stopped the job and informed their Supervisor and Marathon Turnaround Coordinator responsible for the work.
Resolution	<p>The Contractors met with Marathon Operations, the Turnaround Coordinator and Marathon Safety Representative. They reviewed the isolation plan, the Contractor’s written standard and the site standing instruction on energy isolation. After this review, the group agreed to changes to the isolation plan as suggested by the Contractor’s written standard. The changes were made, and work continued.</p> <p>Note: This is an actual scenario that occurred during the 2014 Wilmington HCU Turnaround. Work was delayed 36 hours until all parties were satisfied that the job was safe to continue. The contractors were recognized in the following week’s “All Hands Safety Meeting.”</p>
Scenario B	On night shift, Operators are completing the checklist prior to the startup of a recycle compressor following a rebuild. They noticed that valves on the loaders had been removed during the rebuild but were still referred to in their procedures.
Action	The Operators stopped progress on the startup checklist and communicated the valve issue to their relief at shift change.
Resolution	<p>The following morning, a group of engineers met with Operations and completed the required MOC, revised the procedures and trained the crew who would be performing the startup that day.</p> <p>Note: this is an actual scenario that occurred at the Carson FFHDS startup of the A Compressor in June 2016. The crew received formal recognition for their action to suspend startup activities.</p>
Scenario C	During an audit by the Contractor Safety Council, contractors and Marathon employees were reviewing some construction work. The workers could not locate their permit or answer permit-related questions.
Action	The audit group stopped the job until the permit could be located and the issues resolved.
Resolution	<p>The auditors contacted the Marathon Construction Coordinator who located the permit package. The group reviewed the permit and accompanying documents to assure that all precautions on the permit and JHA were understood and were being followed.</p> <p>Note: this is an actual scenario that occurred during a Contractor Safety Council audit in June 2016. This was noted as a good catch in that day’s Leadership Team Meeting.</p>

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Appendix C: Stop Work Intervention Process Flow Chart



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Revision History

Document Revision History

Complete the following table for each document revision.

Date	Approver	Owner	Revision Details
August 15, 2016	J. Mike Kulakowski	Rinaldo Edmonson	<ul style="list-style-type: none"> • Changed Stop Work Authority to Stop Work Obligation. • Combined Stop Work Authority documents from Carson and Wilmington to one HSS integrated document. • Aligned SWO Process (i.e. Steps, Use of SWO, Conflict Resolution and Resuming Work with Stop Work intent • Include examples of stop work usage
12/12/2017	J. Mike Kulakowski	Rinaldo Edmonson	<ul style="list-style-type: none"> • Changed Stop Work Obligation to Stop Work Authority and Obligation. • Removed Examples of Stop Work Obligation. • Revised wording to ensure clear alignment with California PSM Regulations, collaborating with USW representatives.
7-3-2019	J. Mike Kulakowski	Rinaldo Edmonson	<ul style="list-style-type: none"> • Include examples of stop work usage
7/11/2022	J. Mike Kulakowski	Rinaldo Edmonson	<ul style="list-style-type: none"> • No changes
8/28/2024	J. Mike Kulakowski	Rinaldo Edmonson	<ul style="list-style-type: none"> • Added: • 2.4: Adverse action for exercising SWAO. • Process steps for supervision & leadership • 3.2.3: The hazardous condition identified should be mitigated if practical and communicated to all affected personnel (e.g., Equipment Owners, Craft persons)... • 3.2.4. Ensure all initiated SWAO are captured within FAST Audit under “Stop Work Moment” by the employee who initiated the SWAO by the end of the shift it occurred. • 3.6 Reporting • 3.7 Recognition • SWAO Flow Chart • Clarified: • Process steps and reporting • 3.1.2. a: An example of what using SWAO in a positive and respectful manner looks like. • 3.2.1. a: includes any issued work permits authorized for the work in question... • SWAO Process Steps for Supervision • 3.5.2. b: updated MRA/TRA to current SWP forms that do and do not require approvals and the Permitted Task List

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