



CAFO (Chicago Area Facilities Operations) Crisis & Continuity Management Program

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1.0 What This Document is About

This document describes how Chicago Area Facilities Operations (CAFO) performs Crisis & Continuity Management (C&CM), particularly how the entity is set-up to manage and support C&CM in line with the requirements of GDP 4.6-0001.

This Program complements the Group Defined Practice (GDP), which describes requirements and minimum expectations, and is binding for the entity.

The document is owned by the Naperville Entity Leader and serves as a communication tool within the entity, providing guidance, a framework and instructions.

Who needs to read it?

- Those tasked to implement C&CM at all levels within the entity
- The Entity Leader
- BU Duty Managers

2.0 Scope

This document applies to Chicago Area Facilities Operations (CAFO) and covers Crisis & Continuity Management within the Entity and 30 South Wacker.



The environment in which the Chicago Area Facilities Operations (CAFO) department operates is best categorized as a landlord-tenant relationship. In particular, CAFO acts as the landlord for various BP and non-BP tenants that are located on the property at 150 West Warrenville Road, Naperville, IL 60563 (otherwise known as the “Naperville Campus”). This also includes leased office space at 30 South Wacker. As such, CAFO provides office space, research laboratories, pilot plant areas and the utilities to operate them. CAFO also provides an environment which requires input from the tenants through participation in various committees designed to help ensure that the approach to health, safety and environment is consistent across the site. For example, CAFO chairs the Site Entity Steering Team (having representation from each major tenant) which establishes accountabilities and responsibilities for each OMS subelement, including 4.6 (Crisis & Continuity Management). BP manages all site emergencies on behalf of these tenants but includes them in the response process by requiring that pre-identified tenant representatives be contacted – especially when the business unit that they represent is affected.

This document does not apply to partner, JV or 3rd party operated sites.

This document does cover Oil Spill Response even though the potential impact of an oil spill at the Naperville Campus is low.

The Entity’s Business Continuity Management scope is defined as follows:

- (1) It covers CAFO and IISN employees at the Naperville Campus (150 West Warrenville Rd, Naperville, IL) and the leased space at 30 South Wacker, Chicago, IL).
- (2) It does not cover the business continuity needs of BP and non-BP tenants, except to the extent that their office space is affected during a facility emergency. All tenants are expected to have their own business continuity management strategy to cover business needs that are beyond what CAFO can provide.

This has Entity Leader agreement and endorsement.

3.0 Accountabilities

With reference to GDP 4.6-0001, the accountabilities for C&CM in the Chicago Area Facilities Operations (CAFO) have been formally assigned to individuals as follows:

Role	Accountability
Naperville Entity Chair	Accountable for entity’s conformance with OMS GDP 4.6-0001 and owns the Crisis & Continuity Management Plans (including the Incident Management Plan on the Chicago HSSE website). The Chair approves the program document, but delegates the task of implementing the specifics, validating effectiveness and monitoring to the respective SPAs.
Naperville Entity SPA C&CM	Responsible for the implementation of C&CM provisions (program, planning, training, exercises) in the entities and conformance with GDP 4.6-0001. This includes maintenance of the Incident Management Plan.

The above named individual’s ‘My Plan’ is required to contain a reference to C&CM, relevant responsibilities, objectives and contributions.

Succession plans are in place for those with C&CM Program accountability / key role holders.

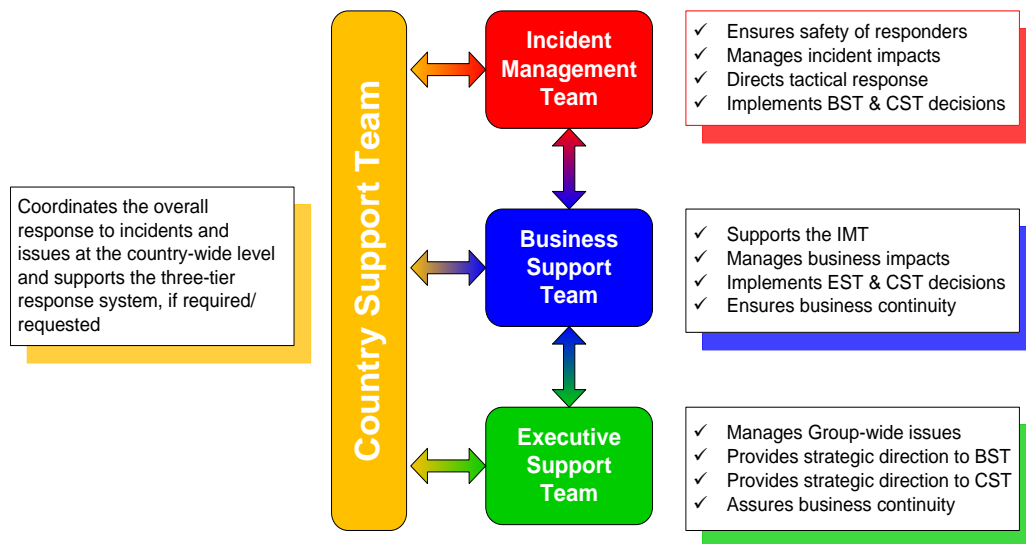
4.0 Crisis & Continuity Management

Crisis and Continuity Management provides guidance on processes and tools for building resilience in emergency response systems. This helps enhance the capability to effectively identify C&CM risks, prepare for, assess, manage and respond to events that may threaten the business, thereby safeguarding the interests and objectives of the staff, clients and stakeholders of Chicago Area Facilities Operations (CAFO).

Within OMS, Group Essential 4.6 sets out the requirements for identifying Crisis and Continuity Management scenarios, implementing C&CM plans to manage identified scenarios and validating plans through exercising and training and thereby enabling the business to implement and execute C&CM plans.

The Group Defined Practice for Crisis and Continuity Management (GDP 4.6-0001) provides the basis for understanding, developing and implementing C&CM and describes BP's defined approach in support of the above.

The Incident Management Team (IMT), Business Support Team (BST) and the Executive Support Team (EST) form the BP Group's escalation tiers of the Three-Tier-Crisis and Continuity Management Response System and the Chicago Area Facilities Operations (CAFO) follows the principles of the three tier model with both tactical and strategic teams in place at entity level. CAFO practices an "over-respond" philosophy by activating all core IMT members, quickly assessing the magnitude of the crisis and then standing down individuals as the situation dictates.



Business Continuity Plans are in place to ensure that identified critical business processes can continue or be recovered following a disruption.

The links and notification processes between the teams and plans have been defined, documented and are covered in training courses and exercises.



The role of the CAFO natural organization is to maintain existing business processes by filling gaps generated when responding personnel are activated and, therefore, unable to continue in their non-emergency role.

5.0 C&CM Program

5.1.1 Objective

The overall objective is to mitigate the effects of an incident and ensure business continuity as quickly as possible. The response priorities are listed below.

- People
- Environment
- Property
- Business

5.1.2 Annual assessment of Risk

Within Chicago Area Facilities Operations (CAFO), we follow the standard approach as defined by the Operating Management System, or OMS. We start by identifying risks and scenarios that could negatively impact the business and we prepare for what could happen. A Risk Management process is in place, using the SIP tool and the RMR to record, monitor and report on operational and HSSE risk, including worst case scenarios. It is the Risk Champion's responsibility to ensure that Business Impact Analysis results are fed into the existing risk process as appropriate.

The Naperville Entity Leader participates in the entities risk management process and is responsible for ensuring that identified C&CM risks are reflected as appropriate.

5.1.3 C&CM Response Plans

We seek to mitigate those identified risks and put Crisis and Continuity plans in place to help us respond if and when there is an incident.

These plans exist at the appropriate levels in the entity, covering the minimum requirements as per GDP 4.1-0001 section 4.1 and are subject to regular (at least annual) reviews.

[CAFO Incident Management Plan \(IMP\)](#)

[CAFO Business Continuity Plan \(BCP\) - including Pandemic](#)

[CAFO Office Space Continuity Plan \(OSCP\) & Team Addendum](#)

[Emergency Procedures for Campus Population](#)

[30SW Business Continuity Plan](#)

[Emergency Procedures for 30SW](#)

[Fuels NA Crisis & Continuity Management Program](#)

[US FVC Business Support Plan](#)

[Fuels NA BST Roster](#)

[Executive Support Plan](#)

[Illinois Emergency Management](#)

[DuPage County Homeland Security and Emergency Management](#)

[Naperville Emergency Management Agency](#)

[Cook County Homeland Security & Emergency Management](#)

[City of Chicago Emergency Management & Communications](#)

5.1.4 Exercising and validation of Plans, Teams and Capabilities

The Entity is accountable for ensuring that plans and resources (e.g. budget, people and facilities) are in place to effectively manage a crisis.

At the appropriate levels within the entity, exercise programs and matrices are in place to offer, schedule and provide exercises as required by GDP 4.6 Section 3.5 (Table 1, Page 9), with records of participation, reports/evaluations and Lessons Learned being maintained.

CAFO conducts exercises at the following frequency to validate plans. The custodian identified here is responsible for ensuring that these are carried out.

Type	Frequency	Participants	Custodian
Notification	Semi-annual	IMT, OSCT, Duty Managers (Naperville, 30SW)	C&CM SME
Tabletop	Annual	IMT, ERT, 30SW SRT & BCT, Municipal Responders invited (as appropriate)	C&CM SME
Limited	Every 2 Yrs	ERT, campus population, 30SW population	C&CM SME
Full-Scale	per BST	As directed by BST	BST Leader

Drills are documented through a combination of drill reports that are maintained within the HSE Central File, individual participation records within the Virtual Training Assistant (VTA) and action items within Tr@ction. In addition, the CAFO Learning Forum is a repository for lessons learned from a variety sources, including crisis management activities.

5.1.5 Availability of C&CM Resources (People)

CAFO depends on various groups at the facility during a crisis and assures their readiness through the following process. It is CAFO’s intent to ensure that all responders have been trained before being placed in an active response role.

Training/Capability/Personal Development

Emergency Response Team (ERT)/Safety Response Team (SRT): The initial emergency response is handled by the ERT on the Naperville Campus and the SRT in the floors leased by BP in the office building at 30 South Wacker. These teams go to the scene of the emergency and manage the response in the field, which may include wearing personal protective equipment, using emergency response equipment and addressing medical emergencies. The Naperville Entity HSE Manager is currently responsible for enlisting new members on these teams only after interviewing candidates to ensure they are joining because of their desire and capability in participating on such a team. Each member receives regular training as described in the training section below and participates in one or more of the emergency response exercises described above.

Incident Management Team (IMT): For more significant emergencies, the IMT is activated to support the field response, provide temporary workspace and manage broader issues such as employee communications and public relations. The Facilities Director, along with select members of the CAFO management team, annually reviews the IMT roster to identify individuals for filling the various positions. Each IMT member receives training as described in the training section below and participates in the annual tabletop exercise. In some cases, the tabletop is a joint drill with municipal responders. During the annual reviews, the Facilities Director assures that each position has at least one alternate in the event of a long running response. Given the



brief duration of emergencies identified in the campus risk register, two individuals for each position are believed to suffice.

Duty Managers: Whenever an emergency affects workspace, the IMT activates its business unit contacts, known as duty managers. They provide the communication link between CAFO and their business unit's continuity team. Each business unit and functional group identifies who will fill this role and each individual receives annual refresher training as mentioned in the training section described below.

Succession Planning

CAFO Leadership has placed the accountability for the C&CM program with the Naperville Entity HSE Manager (C&CM SPA). As the need arises to fill this role, CAFO takes candidates through a robust interview process in coordination with Human Resources to assure that the most capable candidate is selected. CAFO Leadership depends on the Life Safety Lead to be accountable for the C&CM activities in the event that the Naperville HSE Manager position is vacant.

Mutual Response Resources

At present, CAFO has one individual on the North American Mutual Response Team. As others are identified, they will receive the necessary training and be placed on the list.

- Patty Himmel, Senior Administrative Assistant

Mutual Response Team resources are activated by contacting the Incident Notification Center (INC) at 800-321-8642 or INC management.

5.1.6 Availability of C&CM Resources (other)

At the appropriate level in the entity, processes and controls are in place to ensure access to C&CM resources such as equipment, response rooms, battle boxes, or other as relevant and the maintenance thereof. See details below.

IMT Command Post

The IMT utilizes any of the rooms below (depending on availability) to serve as the command post. These rooms are equipped with telephone and computer capability.

- Naperville: 601-1118G (CAFO offices) – equipped with battle box/campus drawings
- Naperville: 200 Complex (2nd Floor – 2019J, 2017J, 2019D, 2019L
- Naperville: 601-Lower Level (Security Office)
- Naperville: Allied-Universal Corporate Offices, 387 Schuman Blvd, Naperville, IL

The Naperville Entity HSE Manager is responsible for ensuring that potential command posts are identified and the designated equipment is maintained.

ERT Equipment

The ERT may use a variety of equipment as described in the RCRA Spill Contingency Plan including spill carts, AEDs, fire extinguishers, etc. The plan is available in the HSE Central File.



Each ERT member is issued a two-way radio and various emergency response gear contained in a “responder bag.” The type of equipment designated for use by the ERT and the inventory is managed by the Naperville Entity HSE Manager (or his/her designee).

Emergency Equipment for Naperville Campus Population

The campus maintains various emergency response equipment (fixed or otherwise) to support the general campus population in the event of an emergency. The following individuals are responsible for making sure that emergency equipment is in place and in good working order.

<u>Equipment</u>		<u>Owner</u>
Automatic External Defibrillators	-	Medical Director
Fire Fighting equipment	-	Mechanical Engineering Team Lead
Emergency/Life Safety Alarms	-	Instrumentation Engineer
Safety Showers/Eye Washes	-	Line management
Spill Carts	-	ERT Building Captains

Click the link below to see further details about this equipment.

<http://chicagohsse.bpglobal.com/safety/emergencyequipment/>

SRT Equipment

The SRT at 30SW may use available "responder bags", AEDs, or fire extinguishers when responding to an emergency. Each SRT member is issued a two-way radio. The type of equipment designated for use by the SRT and the inventory is managed by the CAFO HSE Specialist at 30SW.

5.1.7 Training

We equip our people, particularly, though not exclusively, the responders, with theoretical and practical knowledge through training and exercises to ensure they are prepared to carry out their role should it be necessary.

At the appropriate levels within the entity, training programs are in place to offer, schedule and provide a C&CM education as required by GDP 4.6 Sections 3.5 and 4.2., with records of participation and attained skills being maintained.

Campus Population

Each employee, contractor and visitor who gains access to the 30SW or the Naperville campus through the Security Department’s badging process receives an initial orientation (and annually thereafter) which includes the general emergency procedures for these facilities. The orientation content is managed by Security who receives regular input from various subject matter experts. These procedures, available at the link below, are maintained by the Naperville Entity HSE Manager (or his/her designee). ID badges de-activate within one year after training is complete, so individuals must complete the training by the anniversary date to avoid a lapse in campus access.

[Naperville Emergency Procedures for Site Population](#)
[30SW Emergency Procedures for Site Population](#)



The Naperville link also contains more specific procedures which are applicable to laboratory, pilot plant and utility operations. Affected teams re-familiarize themselves with these each year as a part of CAFO management's Annual Authorization To Operate (AATO) process – a procedure designed to help assure management that the risks associated with the equipment are being managed. The CAFO Process Safety Engineer maintains the AATO procedure and affected teams are responsible for carrying out the AATOs.

Also, building occupants participate in an evacuation drill each year.

Emergency Response Team (ERT)/Safety Response Team (SRT)

The Emergency Response Team members at the Naperville Campus take part in an extensive training program each year as described below.

INITIAL: Hazardous Waste Operations & Emergency Response (HAZWOPER) – 24 Hour

REFRESHER: ANNUAL - (1) HAZWOPER (8-hour refresher), (2) campus evacuation drills.
MONTHLY - Topics include, for example, incident command (ICS) training, CPR, SCBA Respirator fit testing, first aid, blood borne pathogens, fire extinguisher use, monitoring equipment familiarization, contaminated person rescue, compressed gases familiarization and response, media response, confined space rescue familiarization, etc.

The Safety Response Team (SRT) at 30SW receives regular training focused on typical emergencies found in the office environment. This includes first aid, CPR, AED, etc.

All training is managed by the ERT Captain (with Training responsibility) for the ERT at Naperville and by HSE Specialist for the SRT at 30SW. Consultants are utilized as needed. The records for this training are maintained within the Virtual Training Assistant (VTA).

Incident Management Team (IMT)

The CAFO Incident Management Team (IMT) members receive training as described below.

INITIAL: (1) National Incident Management System (NIMS) Courses ([NIMS 100](#) and [NIMS 200](#), computer-based), (2) IMT Overview session (classroom). During the overview session, IMT information taken from the BP C&CM website is presented. In addition, specific duties for each position are covered.

REFRESHER: ANNUAL: (1) IMT Overview session, (2) Joint Tabletop Exercise.

The Life Safety Lead assures that all training is completed. The records for this training are maintained within the Virtual Training Assistant (VTA).

Entity Leader & Entity SPA C&CM

These individuals undergo the same training as that required for IMT members. However, in addition, they also complete a competency assessment per Section 4.2.B.2 of the GDP 4.6-0001.

Training Effectiveness

On an annual basis, the C&CM SME initiates a review with affected individuals to evaluate the



effectiveness of the training described above. The results are reported in the annual management review.

5.1.8 Budget

CAFO Leadership fully supports the entire Crisis & Continuity Management program within the department and makes funds available as needed for preparedness and actual emergency response within the overall operating budget. The Naperville Entity HSE Manager (also the Entity SPA C&CM) maintains a budget for purchasing and maintaining various emergency response equipment for the Emergency Response Team. CAFO has no full-time C&CM staff and, as a result, personnel costs are distributed among the various departments and business units.

5.1.9 Applicable Regulatory Requirements

These are the regulatory requirements that generally apply at the Naperville Campus. A subset of these requirements applies at leased space at 30 South Wacker. CAFO's objective is to make sure that these requirements are reflected in consolidated facility emergency response plans or in stand-alone plans, where appropriate.

- HAZWOPER (29 CFR 1910.120)
- Emergency Action Plans (29 CFR 1910.38)
- Emergency Planning & Community Right-to-Know (40 CFR 355 & 430 ILCS 45): Addresses releases of "Extremely Hazardous Substances."
- Spill Prevention, Control & Countermeasures (40 CFR 112): Addresses oil spills.
- RCRA Spill Contingency Plan (35 IAC 725): Addresses hazardous waste releases.

5.1.10 Stakeholder Engagement

Effective management of internal stakeholder relationships facilitates the successful implementation of a C&CM Response. As part of the development of Crisis & Continuity Management plans, CAFO has identified key internal and external stakeholders at the appropriate levels, considered appropriate strategies for relationship management and clearly established accountabilities for stakeholder relationships. These stakeholder relationships are managed via: (1) the duty managers (which represent the business units and tenants who operate on CAFO facilities), (2) the Site Entity Steering Team (SEST) and (3) the BU C&CM Managers (30SW). The duty manager relationship is documented in the link shown below. It is the obligation of each business unit to maintain contact with the CAFO IMT through engaging with and supporting the duty manager network via their own named representative. The SEST is a single Naperville site team that has line-of-sight accountability for the key process risks and also has the authority to commit their organizations to action. It includes all major site operating lines, S&OR, and assigned entity resources. Linkages with the BU C&CM Managers at 30SW include regular meetings and collaboration on training, drills and C&CM documentation.

Duty Managers: <http://chicagohsse.bpglobal.com/abouthsse/teams/budutymanager/>

External stakeholders are managed through a joint effort involving the CAFO IMT External Information Officer and the BST Liaison. These individuals maintain relationships with various community organizations and the news media.

5.1.11 Accounting for Personnel



CAFO has processes in place at the appropriate levels, to be able to account for personnel (by name) and these are tested and updated as least twice a year as required by GDP 4.6 section 3.4. The high-level process used at each location is described below.

Naperville

A manual role-checking process is used when a building evacuation takes place on the campus. In general, building occupants evacuate to their predetermined muster point on the grounds, check in with their role checker, and wait until authorities permit re-entry into the building. Field responders follow-up on individuals who are identified as missing. Role checkers are required to keep their evacuation list up-to-date at all times and to participate in an annual refresher of their duties. Occupants participate in an evacuation drill once per year. For further details, click on these links.

[Naperville Evacuation Procedure & Maps](#)

30 South Wacker (30SW) - Chicago

In the event of a building evacuation at this location, two simultaneous actions are set into motion. First, since there is no available muster space in the city, building occupants are instructed to exit the building and either go home or to another work location designated by their business unit. Second, CAFO representatives activate the BP Alert system – a computerized system which can contact individuals by text, e-mail and/or phone and accept an “okay/ not okay” response from each. The BP Alert system is activated by calling the Incident Notification Center Operator (located at Naperville). For the duration of the activation, the Notification Center provides status reports so that the business units can follow up with those who gave a “not okay” response. The detailed procedure is maintained by the CAFO staff at 30SW.

Registration Process for BP Alert: <http://bpfacilitynotification.cloudapp.net/>

5.1.12 Annual Review / Lessons Learned / Continuous Improvement

The CAFO C&CM SPA is responsible for the annual review of the C&CM program and its implementation throughout the entity.

Each year, CAFO conducts a gap assessment to evaluate adherence to OMS. Any C&CM gaps identified during that assessment are presented along with actions to close those gaps, highlights for the year and plans for the upcoming year are presented to the Entity Director.

Links with Group C&CM are established and maintained to ensure that the SPA is connected to the practitioner network, can participate in network / Community of Practice events, and be informed and involved at all times. Group C&CM also provides assurance as part of their remit.

Reporting links with Group C&CM are also in place for the annual C&CM assessment reporting.

CAFO follows a process for investigating incidents and identifying lessons learned that adheres to GDP 4.4-0002 (Investigating Incidents) and GDP 2.4-0001 (Learning from Incidents), respectively. The CAFO HSE Manager is the custodian of this process. Lessons learned are managed and communicated through the Learning Forum. As continuous improvement opportunities are identified, they are incorporated into the C&CM plans by the C&CM SPA or C&CM SME.

CAFO IMT members also conduct a post-incident review after each incident in which the IMT is officially activated. The meeting is documented and placed on the Naperville Entity C&CM Sharepoint. Action items are placed into Tr@ction and tracked to completion. ERT members also conduct a debrief after each incident and document any actions in the incident report. Any action items are tracked to completion in Tr@ction as well.

5.1.13 Document Control

The C&CM documentation is available at the links and locations listed throughout this program document. See below.

- Chicago HSSE website contains Naperville C&CM plans.
- 30SW website contains C&CM Plans.
- Virtual Training Assistant contains C&CM training records.
- Naperville Entity C&CM Sharepoint contains various C&CM plans, rosters and post-incident reviews.
- Tr@ction contains action plans for addressing opportunities for improvement.

6.0 Acronyms and Definitions

Acronym	Definition
30SW	30 South Wacker Facility
IMP / IMT	Incident Management Plan / Incident Management Team
BSP / BST	Business Support Plan / Business Support Team
BCP / BCT	Business Continuity Plan / Business Continuity Team
GDP	Group Defined Practice
OMS	Operating Management System
SPU	Strategic Performance Unit
C&CM	Crisis & Continuity Management
CCM/ER	Crisis, Continuity Management and Emergency Response
HoC	Head of Country
SPA	Single Point of Accountability
SME	Subject Matter Expert
JV	Joint Venture
RAT	Risk Assessment Tool
RMR	Risk Management Report

7.0 Revisions

Date	Author	Changes	Reviewer
12/30/13	J. L. Saylor	Initial Version	D. R. Zbinden
6/30/14	J. L. Saylor	Various continuous improvement changes made as identified in the latest gap assessment. Also, included a number of changes to clarify coverage of 30SW.	D. R. Zbinden
6/17/15	J. L. Saylor	Review conducted. No substantive changes made.	J. L. Saylor



6/16/16	J. L. Saylor	Review conducted. Removed references to Cantera 2 and Life Safety Specialist.	J. L. Saylor
6/28/17	Dan Zbinden	Review conducted. Removed all references to "Environmental Lead", and designated the Naperville Entity HSE Manager as C&CM Program custodian for the interim period.	Dan Zbinden

8.0 Distribution List

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