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1. Purpose

1.1. The purpose of this policy is to define Gallant Industrial approach to Line Cutting activities.

2. Scope

2.1. This policy applies to any Gallant Industrial work involving line cutting activities on process equipment. This includes process piping, conduit, electrical cables, and tubing. This policy is intended to ensure the correct line is identified prior to cutting operations.

3. Roles and Responsibilities

3.1. Construction Managers / Project Managers / Site Managers / and Gallant Site Leadership

3.1.1. Understand and comply with the requirements outlined in this policy.
3.1.2. Ensure the requirements of this policy are fully implemented and adhered to.
3.1.3. Ensures Taping and Tagging materials are available at the jobsite.

3.2. Superintendents / General Foremen / Foreman

3.2.1. Understand and comply with the requirements outlined in this policy.
3.2.2. Ensure the requirements of this policy are fully implemented and adhered to.
3.2.3. Provide necessary interaction as required by this policy.
3.2.4. Verify the taping and tagging are applied prior to approving/allowing cutting operations to proceed.

3.3. Site Safety

3.3.1. Supports site leadership is needed to ensure the requirements of this policy are being met.
3.3.2. Routinely audits the application of this policy for compliance.

3.4. Front Line Employee (Affected Person)

3.4.1. Verifies and ensures all work permitting, risk assessment and hazardous energy mitigation steps are followed to complete the work safely.
3.4.2. Comply with all requirements as detailed in this policy.
3.4.3. Applies taping and tagging at the cut point.

4. General Requirements

4.1. Line, Cut Point(s), and system conditions Identification method.

4.1.1. The line to be cut must be identified by the equipment owner during a joint job walk with the equipment owner (plant operations).
4.1.2. The cut point(s) shall be within system isolation (LOTO).
4.1.3. The cut point(s) shall be performed only on lines verified to be dissipated of hazardous energy.
4.1.3.1. If the cut point is not within line of site of a dissipation point (open and proven vent or bleed) a 1/8th inch pilot hole shall be drilled at the cut point.
4.1.4. During the joint job walk with the equipment owner the cut tape and cut tag(s) must be applied and agreed upon.
4.1.5. The cut point(s) shall be marked with cut tape on both sides of the cut point within 12 inches and the cut tag shall be affixed to the line within 18 inches of the cut point and signed by the Foreman or above overseeing the work.

4.2. Additional Requirements

4.2.1. A line cut that also serves as a first line break shall meet all of the requirements detailed in Gallant's First Line Break Policy.
4.2.2. Cold cutting methods are preferred however hot cutting methods are allowed and need to be performed within the client facilities hot work permitting policies/procedures as applicable.
4.2.3. Line cut method steps, hazards, and mitigations are required to be on the risk assessment covering the work (permit JSA, STA, etc.)
4.2.4. When applicable, removal of preservative coating/painting from the pipe (minimum of 6 inches) should be considered if lead containing paint/coating is suspected.

4.2.5. Cuts performed on steam traps shall be exempt from the requirements of this policy when the piping to be cut is within the LOTO for that steam trap and is within line of sight of an open bleeder or vent.

5. Definitions

Cold Cutting – Cutting method that does not utilize heat as the mechanism for performing the cut.

Equipment Owner – A Plant Employee who is knowledgeable in the operation of the equipment being serviced and the equipment layout/isolation points and is trained in the correct methods of isolating the equipment being serviced. This employee is typically the permit issuer but not always.

Joint Job Walk – A walkdown of planned work ensuring alignment and agreement between Gallant and plant operations/equipment owner.

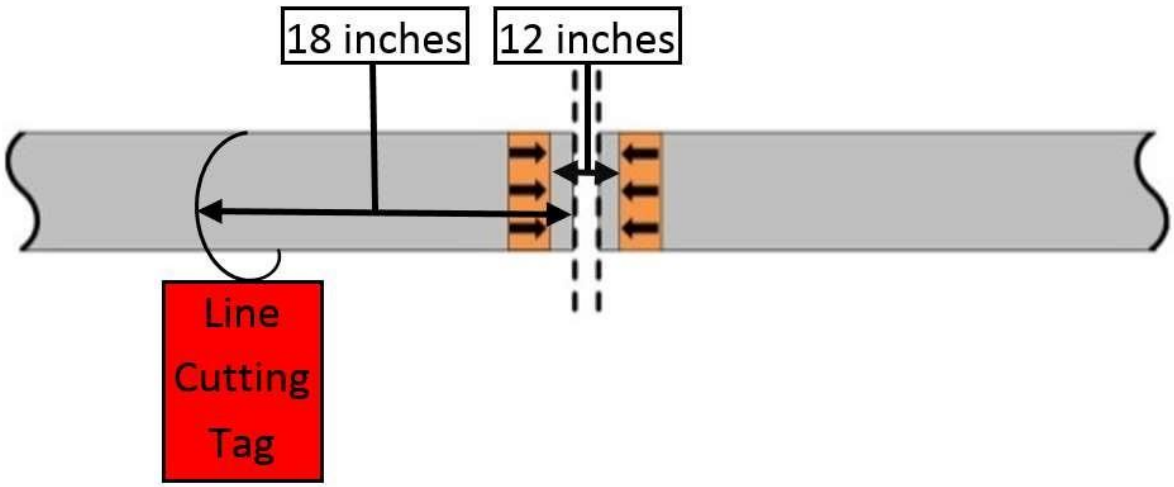
Line Cutting – Refers to cutting activities of process lines.

Proven Bleeder or Vent – An open-ended branch valve in the open position and proven clear by positive flow purge or insertion of a mechanical device and located close enough to the Line Cut such that a free path can be established between the two points such that the line or vessel can be verified to be clear of stored pressure, liquids or gas.

6. Forms and References

6.1. 29 CFR 1910.119 Process Safety Management

6.2. 29 CFR 1910.147 Lockout/Tagout

6.3. Gallant's First Line Break Policy

Example