

Marathon Petroleum Company LP			
Non-English Speaking Workers	Document No.: RSW-SAF-069-DT	Approval Date: 07/25/2018	Page 1 of 4
	Revision No.: 6	Next Revision Date: 01/11/20	
	Document Custodian: Environmental, Safety and Security		

1.0 PURPOSE

- 1.1 This procedure will outline the process for obtaining approval to utilize Non-English Speaking (NES) workers and provide guidelines for managing the safety and health issues related to their work.

2.0 SCOPE

- 2.1 This policy applies to all areas of the refinery. Any modifications to this procedure require approval from the HESS Manager.

3.0 PROCEDURE

3.1 Approval Process Procedure

- 3.1.1 To initiate the process for requesting the use of NES workers at the Detroit Refinery, the requestor must complete a "Non English Speaking Worker" Request form. The form must be signed by the requestor's Department Manager and submitted to the Safety Supervisor for review. The Safety Supervisor will then forward it to the HESS manager sign off and approval by the Division Manager.
- 3.1.2 The Division Manager's approval / rejection of the request will be communicated to the requestor and the request form will be filed in the Safety Department.
- 3.1.3 The contract company providing NES workers shall obtain approval through MPC's Safety Qualification process prior to performing work at the Detroit Refinery.
- 3.1.4 Prior to the NES workers beginning work at the Detroit Refinery, a pre job meeting shall be held with representatives of the Detroit Refinery Safety Department, requesting department and the contract company providing the NES workers. The contract company shall develop a plan to address all safety and health concerns and present the plan at the pre job meeting.

3.2 Communication

- 3.2.1 A Bilingual Representative is required for every ten (10) NES workers. The Bilingual Representative:
- 3.2.1.1 Must be in the immediate vicinity of any NES worker. This person can be the foreman or other competent person that is knowledgeable of the work being performed and the related HESS precautions and procedures. There may be times where individual NES workers may leave the worksite to go for materials or supplies. This is permitted as long as the bilingual representative remains cognizant of the individual NES workers whereabouts, duration of absence and maintains accountability.
- 3.2.1.2 Must communicate permit requirements and ALL pertinent information and confirm understanding by the NES workers.
- 3.2.1.3 For safety critical jobs (i.e. confined space entry, energy isolation), bilingual representatives may be required for fewer than ten (10) NES workers, as well as a dedicated MPC representative to ensure the work is proceeding safely at all times.
- 3.2.2 Identification
- 3.2.2.1 All NES workers shall wear a decal on their hardhat indicating their NES status. Likewise, all bilingual representatives shall wear a decal on their hardhat indicating their position.
- 3.2.2.2 These decals are provided by the Detroit Refinery Safety Department.
- 3.2.3 Site Emergencies
- 3.2.3.1 The bilingual representative must communicate the emergency procedures to all NES workers prior to beginning work at the Detroit Refinery.

3.2.3.2 During site emergencies, it will be the responsibility of the bilingual representative to communicate all pertinent information to all NES workers.

3.2.4 Work Permits / Joint Job Site Visits

3.2.4.1 The Bilingual Representative must participate in the joint job site visit and communicate the information to the NES workers.

3.2.4.2 The Bilingual Representative is responsible for communicating and ensuring all NES workers understand the requirements of the permit.

3.2.5 Signs and Tags

3.2.5.1 Signs posted in the refinery to warn of a hazard should be bilingual (English and Spanish). Universal symbols will be utilized wherever possible.

3.2.5.2 A non-English version of most signs and tags relevant to the safety of the non-English speaking workers will be available.

3.2.6 Safety Data Sheets (SDS)

3.2.6.1 Several of the most common chemicals in the MPC SDS database are available in a non English version on the MPC website. If the chemical being used is not available in the language of the work force, the bilingual representative is responsible for communicating the information to the NES workers.

3.3 Training

3.3.1 All NES workers shall be trained in the applicable safety and health topics applicable to the work to be performed. The contractor providing the NES workers is responsible for providing the training in the language spoken and understood by the NES workers.

3.3.2 The NES workers must successfully complete Detroit’s Safety Orientation (DSO). The company is required to share DSO with NES workers when DSO is not available in their spoken language and provide proof of this training. They may also be required to translate the “Our Safety Culture Workshop”.

3.3.3 The bilingual representative shall review the appropriate Process Hazards Overview with all NES workers and maintain proof of training.

3.4 Auditing

3.4.1 Periodic auditing will be conducted by MPC to ensure that NES workers are working safely and that they have an understanding of the safe work practices and emergency procedures.

4.0 DEFINITIONS

4.1 Immediate Vicinity – Within immediate shouting distance so that the NES workers can hear and understand instructions.

4.2 Bilingual Representative – Person that is fluent in English as well as the language of the workforce and is able to read, writes, and speaks both languages. This person must be knowledgeable of the Detroit Refinery’s, as well as the contractor’s, safety and emergency procedures and be able to convey them to the NES workers.

5.0 REFERENCES

6.0 ATTACHMENTS

6.1 ATTACHMENT A - Non-English Speaking (NES) Worker Request Form

7.0 REVISION HISTORY

Revision number	Description of change	Written by	Approved by	Effective date
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2	Full program review, deleted reference to Louisiana's procedure	J. Rabideau	L. Mazur	01-11-11
3	Full Program Review – updated 3.2.5 signs and tags, removed 3 rd party auditing, removed that process hazard overviews are available in non-English, reformatted attachment	J. Rabideau	S. Windom	01-13-14
4	Updated header per RGD-1051-DT, corrected dating in footer	F. Ebbert	J. Rabideau	11-04-15
5	Full Program Review - Removed language that a non-english permit will be available, update MSDS to SDS, Removed OSHA Training Card required for NES workers	B. Dibert	J. Rabideau	01-03-17
6	Changed ASO to DSO requirements	B. Dibert	J. Rabideau	7-25-18

ATTACHMENT A

NON-ENGLISH SPEAKING WORKER REQUEST FORM

1. Contractor Name: _____

2. Number of workers: _____

3. Dates Contractor to be on site: FROM:_____ TO _____

4. Type of work to be performed: _____

5. Specific Location of Work: _____

6. Reason for using NES Workers: _____

7. Will additional Bilingual Representatives be available for groups of less than 10 NES workers? (i.e. Life Critical Safety jobs) YES ____ NO ____

Additional Comments: _____

REQUESTOR: _____ Date: _____

REQUESTING DEPT. MGR: _____ Date: _____

SAFETY SUPERVISOR: _____ Date: _____

HESS MGR: _____ Date: _____

DIVISION MGR: _____ Date: _____