

Doc Custodian: GBR Human Resource Manager	Blanchard Refining Company LLC Galveston Bay Refinery	Doc No.: RGD-PS-000021-GB Rev No: 0
Approved By: Keith Hightower	GBR PSM/RMP Employee Participation	Galveston Bay Refinery
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Employee Participation

Overview

Scope

This element provides Galveston Bay Refinery (GBR) employees with the opportunity to participate in PSM and RMP policies and procedures, leading to a greater commitment for PSM implementation. The use of “PSM” in this document applies to the requirements and guidance outlined for both PSM and RMP covered units.

GBR, in consultation with site refinery management, site supervisors, and other site employee representatives, adopt the Marathon Petroleum Company Refining Standard Practice for Employee Participation, RSP-1301. This standard sets the minimum requirements for ensuring that each site’s Employee Participation Program satisfies PSM requirements by:

- (a) consulting employees in the development of the written PSM Site Plan,
- (b) outlining employee participation in every element of PSM,
- (c) providing employees with access to all information associated with PSM programs, and
- (d) providing for an employee participation plan.

This program applies to all PSM-covered processes within the refinery. The requirements of this program may be applied to other processes within the refinery at the discretion of the refinery management team. The program applies to all site employees working in, on, or near the PSM-covered facilities. The program also applies to contract employees who work in the refinery on a full-time basis. Other contract employees working in the refinery are informed of applicable provisions of the site’s PSM program before their work begins through contractor safety orientations and have access to any PSM information necessary for their work.

Note that this plan does not list all employee activities that are important to safety. Many of these everyday job tasks of employees are also an important part of operating a safe facility.

PSM as used in this document encompasses OSHA’s PSM regulation as well as EPA’s Program 3 Prevention Program and Emergency Response requirements unless otherwise specified.

PSM/RMP Regulation

Employee Participation (1910.119 (c)[68.83]

(1)[a] Employers [the owner or operator] shall develop a written plan of action regarding the implementation of employee participation in process safety management as required by this paragraph [this section].

(2)[b] Employers [the owner or operator] shall consult with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in this standard [rule].

(3)[c] Employers [the owner or operator] shall provide to employees and their representatives access to process hazard analyses and to all other information required to be developed under this standard [rule].

**Records
Retention**

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Table of Contents

Employee Participation.....	1
Overview.....	1
Scope.....	1
Records Retention.....	2
1.0 Roles and Responsibilities.....	4
1.1 Roles and Responsibilities.....	4
2.0 Requirements.....	6
2.1 Consultation.....	6
2.2 Site Plan versus Marathon or Refining Standard.....	6
2.3 Implementation.....	6
2.4 Access to PSM Information.....	7
3.0 PSM Activities, Safety Meetings, and Metrics.....	8
3.1 Communication.....	8
3.2 Training.....	8
Appendix A: Examples of Participation.....	9
A.1 Employee Participation.....	9
Appendix B: Example Documentation Form.....	11
B.1 Form.....	11
Appendix C: GBR PSM Element Review Teams.....	13
C.1 Element Review Teams.....	13
Revision History.....	14
Document Revision History.....	14

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1.0 Roles and Responsibilities

1.1 Roles and Responsibilities

The table below lists Employee Participation roles and responsibilities.

Roles	Responsibilities
Site Management and Site Supervision	<ul style="list-style-type: none"> (a) Participate in PSM development and implementation as outlined in the PSM Site Plan. (b) Ensure that employees are afforded the opportunity to consult on program elements and use participation opportunities as <ul style="list-style-type: none"> - outlined in this program, and - more fully described in each of the other PSM programs. (c) Provide comments to management about Refining's development and implementation of PSM programs. (d) Ensure access to PSM information needed by Marathon employees and contractors and resolve any access difficulties. (e) Ensure process safety communication with employees in the following areas: <ul style="list-style-type: none"> - changes to the PSM Standards and Site Plans, - results of applicable Process Hazards Analysis, - investigations of applicable process safety incidents, - process safety training requirements such as refresher training and training associated with MOC, - applicable provisions of the emergency action plan, and - results of applicable audits. (f) Ensure process safety communications by <ul style="list-style-type: none"> - attending safety meetings, - receiving suggestions on process safety issues and concerns, and - providing feedback to management on process safety performance, issues, and employee concerns. (g) Participate in <ul style="list-style-type: none"> - special committees, - incident investigation teams, - PSM element review committees, etc. (h) Support employee involvement. (i) Request, receive, and resolve comments from employees and contractors about Refining's development and implementation of PSM programs and respond appropriately.
Employee Participation Representatives Employees	<ul style="list-style-type: none"> (a) Must be an employee at the site. (b) Represent employees for the purposes of consulting on the implementation and development of the PSM Site Plan. (c) Consult on the implementation and development of the PSM Employee Participation Site Plan. (d) Consult on development of PSM Elements.

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1.0 Roles and Responsibilities, Continued

1.1 Roles and Responsibilities (continued)

Roles	Responsibilities
Employees	<ul style="list-style-type: none"> (a) Provide comments to management about Refining's development and implementation of PSM programs. (b) Ensure that any PSM information necessary to perform work safely has been obtained prior to performing assigned tasks. (c) Report any difficulties in obtaining PSM information to a <ul style="list-style-type: none"> - Supervisor, - Manager, or - designated individual. (d) Participate in appropriate PSM communication. (e) Participate in <ul style="list-style-type: none"> - PHAs, - special committees, - incident investigation teams, - PSM element review committees, etc. (f) Provide suggestions to management to improve process safety.
Site Human Resource Department	<ul style="list-style-type: none"> (a) Oversee Employee Participation plan development and implementation. (b) Serve as element document custodian. (c) Update and distribute the Employee Participation plan. (d) Ensure program requirements are being fulfilled and revise requirements as necessary. (e) Ensure that an Employee Participation plan is implemented and maintained. (f) Ensure the purposes of the Employee Participation plan are fulfilled.

2.0 Requirements

- 2.1 Consultation**
- 2.1.1** A review team consisting of appropriate Site Management, Site Supervision, and Employee Participation Representatives will be consulted during the development and revision of the site's Employee Participation element and plan.
- (a) The makeup of the GBR PSM Element Teams is included in Appendix C of this document.
 - (b) Reviews of all GBR PSM Elements will be conducted by a representative panel. Members of this panel will be a cross-section of the GBR refinery employees, including a combination of hourly and salaried workers, and contractors where appropriate. Standing members of this panel will be members of the PSM and HR Departments. Panel members will serve a three-year term, with no more than two new members at a time, to maintain consistency. The GBR Refinery Management Team will select representatives to this panel in accordance with Article XIV Section 1 paragraph 8 of the GBR USW Contract.
- 2.1.2** After the Employee Participation plan element is developed, appropriate Site Management, Site Supervision, and Employee Participation Representatives will be consulted during the development and revisions of all other elements of each PSM Site Plan.
- 2.1.3** Other Consultation requirements include the following:
- (a) Conduct a review of the Employee Participation and all other PSM elements on a three-year basis or more often, as needed.
 - (b) Document all PSM Site Plan element reviews and consultations.
- 2.1.4** The Site is committed to revising the programs for involvement of employees and/or contractors in these programs based on consideration of employee suggestions and program performance.
- 2.1.5** Appendix B contains a form which can be used to document the participation in, and results of, the team review.
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- 2.2 Site Plan versus Marathon or Refining Standard**
- 2.2.1** Each PSM Covered Facility must review all elements of their PSM Site Plan utilizing the review team referred to above, section 2.1.1. The PSM Site Plan will have to:
- (a) meet the MPC PSM Standard,
 - (b) all applicable Refining PSM Standards,
 - (c) satisfy any state-specific process safety management requirements, and
 - (d) address site specific issues and concerns.
- 2.2.2** These review teams may recommend adopting the Refining Standard as a site plan without any change, but the site review is required to ensure proper employee consultation.
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- 2.3 Implementation**
- The Site believes it is vital to have employees and/or contractors integrated into and participating in each element of PSM. Examples of Employee Participation for the PSM elements are included in Appendix A of this element.

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2.0 Requirements, Continued

2.4 Access to PSM Information

- 2.4.1** Site employees and contractors have access to all PSM information.
- 2.4.2** Site Employees shall have access to PSM information through at least one of the following:
- (a) their supervisor,
 - (b) PSM TeamView website,
 - (c) the person responsible for maintaining the requested PSM information; this is the Document Custodian on PSM Site Plan, or
 - (d) the PSM Coordinators.
- 2.4.3** Contractors may obtain needed PSM information by request
- (a) through their supervisor to the site representative responsible for the contractor's work,
 - (b) directly from the site representative responsible for the contractor's work, and/or
 - (c) through the Contactor Element Champion or delegate.
- If a contractor has difficulty obtaining requested information, and the difficulty cannot be resolved through the contract employee's supervisor, the contract employee can contact the PSM Coordinators for prompt resolution of the request.
-

3.0 PSM Activities, Safety Meetings, and Metrics

3.1 Communication

- 3.1.1** All PSM information to perform work safely, changes to that information, and issues will be communicated to affected employees, and contractors (where applicable). The communication must be two-way to ensure continuing employee participation and involvement. Examples of communication include PSM meetings and routine safety meetings, e-mail, and/or other communication method as deemed appropriate.
- 3.1.2** Communication is required in the following process safety areas:
- (a) Changes to the PSM Standards and Site Plans.
 - (b) Results of applicable Process Hazards Analysis.
 - (c) Investigations of applicable process safety incidents.
 - (d) Process safety training requirements such as refresher training and training associated with Management of Change.
 - (e) Applicable provisions of the emergency action plan.
 - (f) Results of applicable PSM audits.
- 3.1.3** Face-to-face communication is recommended and is to be encouraged to help ensure two-way communication and an open environment for Management and Supervision to listen, understand, consider and act upon concerns and suggestions by employees and contractors, all of which can be essential to a strong PSM program.
- 3.1.4** Suggestions on employee and/or contractor participation in the PSM plans or on plan performance are critical to keeping the plans current. These suggestions can be made during PSM meetings, routine safety meetings, Joint Health & Safety Committee meetings, given to a supervisor who will convey the thoughts to the PSM Coordinators, GBR Safety Suggestions link, or directly to a member of the PSM Department. All suggestions must be communicated to the PSM Coordinators or directed to a member of the PSM Department.
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3.2 Training

- 3.2.1** All site employees are provided initial and refresher training on the PSM Elements. Additional training is given where deemed appropriate.
- 3.2.2** All contractor employees will receive initial PSM training through the Contractor Safety Orientation training conducted prior to the contract employee beginning work in the plant. Any necessary PSM training beyond the safety orientation is the responsibility of the contracting company. The details of this requirement will be further outlined in the PSM Training Site Plan.
- 3.2.3** Employees who consult in the development of the PSM element site specific programs will, at a minimum, review the OSHA regulation associated with the applicable element. Additional training may be given where deemed appropriate.
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Appendix A: Examples of Participation

A.1 Employee Participation

The following table lists examples of Employee Participation from initial development and ongoing implementation of each PSM Element. The examples include:

- (a) participation,
- (b) areas of involvement, and
- (c) opportunities to consult with either hourly and/or salaried employees.

Notes:

- (1) The examples may not contain all the activities a site plan or organization may implement nor may they apply to all employees. Additional and/or different activities, schedules and levels of participation that meet the minimum requirements of this standard may be documented and implemented at the site.
- (2) These activities are not all inclusive, nor intended to apply to each and every organization.
- (3) Individual organizational programs will identify specific activities as appropriate.

PSM Element	Ongoing Implementation
Employee Participation (and PSM in general)	<ul style="list-style-type: none"> (a) Consult on development of Employee Participation PSM element. (b) Participate in PSM program activities as agreed upon. (c) Provide suggestions for PSM program improvements based on experience and lessons learned. (d) Communicate to management any difficulties in accessing PSM information.
Process Safety Information	<ul style="list-style-type: none"> (a) Consult on development of Process Safety Information PSM element. (b) Assist in keeping required information continually up to date. (c) Monitor and record process equipment information.
Process Hazard Analysis (PHA)	<ul style="list-style-type: none"> (a) Consult on development of PHA PSM element. (b) Participate as team members in PHAs and PHA revalidations. (c) Understand the results of PHA revalidations and resolution of new PHA recommendations. (d) Participate in recommendation review and assignment.
Operating Procedures	<ul style="list-style-type: none"> (a) Consult on development of Operating Procedures PSM element. (b) Write new procedures as required. (c) Assigned personnel assist in updating operating procedures based on experience and lessons learned as necessary. (d) Participate in annual review/certification of operating procedures. (e) Assigned personnel suggest revisions/additions to the operating procedures as appropriate. (f) Perform operations tasks per operating procedures.
Training	<ul style="list-style-type: none"> (a) Consult on development of Training PSM element. (b) Participation of assigned personnel to review and provide input on training materials. (c) Provide input on the frequency and content of operator refresher training. (d) Receive and understand refresher training for operations personnel (as well as initial training for new employees).
Contractor Safety	<ul style="list-style-type: none"> (a) Consult on contractor safety PSM element. (b) Report unsafe contractor actions. (c) Assigned personnel to participate in contractor safety meetings. (d) Participate in incident investigations involving contractors.
Pre-startup Safety Review	<ul style="list-style-type: none"> (a) Consult on development of Pre-startup Safety Review PSM element. (b) Assigned personnel to assist in reviews/verifications. (c) Maintain documentation. (d) Document Pre-Startup Safety Reviews, if required.

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Appendix A: Examples of Participation, Continued

A.1 Employee Participation (continued)

PSM Element	Ongoing Implementation
Mechanical Integrity	<ul style="list-style-type: none"> (a) Consult on development of Mechanical Integrity PSM element. (b) Assigned personnel assist in writing new procedures as required. (c) Assist in updating maintenance procedures as necessary. (d) Assigned personnel suggest revisions/additions to the maintenance procedures based on experience and lessons learned as appropriate. (e) Receive, understand and/or provide ongoing training (especially on-the-job training) for maintenance personnel (as well as initial training for new employees). (f) Perform maintenance and inspection/test tasks as required per defined schedules and procedures. (g) Identify/report and help resolve equipment deficiencies. (h) Perform QA/QC activities when required.
Safe Work Practices (Including Hot Work Permits) and Safety Policies	<ul style="list-style-type: none"> (a) Consult on development of Safe Work Practices (SWP) PSM element. (b) Write hot work and other types of safety permits. (c) Suggest and assist in revisions/additions to the SWPs per RSP-1309 as appropriate. (d) Assist in updating SWPs and safety policies as necessary. (e) Follow SWPs and safety policies. (f) Ensure that others (including contract employees) are following SWPs and safety policies. (g) Receive and understand revised/refresher training on SWPs and safety policies. (h) Audit safe work practices and implement corrective actions as needed.
Management of Change	<ul style="list-style-type: none"> (a) Consult on development of Management of Change PSM element. (b) Initiate and manage change requests. (c) Identify changes associated with job tasks. (d) Initiate management of change reviews. (e) Assigned personnel to assist in reviews of proposed changes as appropriate. (f) Receive and understand training/communication of changes, including changes to any PSM standards. (g) Complete management of change assignments.
Incident Investigation	<ul style="list-style-type: none"> (a) Consult on development of Incident Investigation PSM element. (b) Identify incidents that occur and initiate investigations. (c) Participate as team members during investigations. (d) Suggest solutions to problems identified during investigations. (e) Daily review of new incidents and determine assignments as appropriate. (f) Receive and understand training/communication of findings resulting from investigations. (g) Suggest revisions in types of incidents investigated and investigation procedures.
Emergency Planning and Response	<ul style="list-style-type: none"> (a) Consult on development of Emergency Planning and Response PSM element. (b) Identify and report emergency situations. (c) Perform appropriate response actions in the event of an emergency and emergency drills. (d) Participate in Emergency Response teams. (e) Suggest revisions in emergency response actions based on drills and/or responses to actual emergencies. (f) Receive and understand emergency action plan refresher training. (g) Receive and understand applicable emergency response and hazardous materials training.
Compliance Audits	<ul style="list-style-type: none"> (a) Consult on development of Compliance Audit PSM element. (b) Participate as team members and/or interviewees in compliance audits. (c) Receive and understand the results of compliance audits and resolution of audit findings/observations.
Trade Secrets	Where trade secrets apply, employees and/or contractors consult on development of Trade Secret element and request Trade Secret information per the defined procedure or PSM Site Plan.

Appendix B: Example Documentation Form

B.1 Form

The following form ([RSP-1301-FORM1](#)) can be used to document the review of PSM Elements.

Reference: For the most up-to-date working copy of this form, go to http://cbgrs20/red/copyout.aspx?lib_no=32&doc_no=3156.

PSM Element Review Documentation Form	
(RSP-1301-FORM1)	
PSM Element Reviewed	Date of Meeting
Team Lead (Print Name)	Signature
Team Members in Attendance (Print Names)	Signatures

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Appendix B: Example Documentation Form, Continued

B.1 Form (continued)

Key Points of Discussion		
Topic 1:		
Topic 2:		
Topic 3:		
Topic 4:		

Action Items	Assigned To	Due Date

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Appendix C: GBR PSM Element Review Teams

C.1 Element Review Teams

The following table details the GBR PSM Element Review Team members by PSM Element

PSM Element	Element Team	
Employee Participation	<ul style="list-style-type: none"> Element Champion – HR Manager 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME
Process Safety Information	<ul style="list-style-type: none"> Element Champion – Engineering Manager PSI Coordinator 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME
Process Hazard Analysis (PHA)	<ul style="list-style-type: none"> Element Champion – Tech Services Manager 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME
Operating Procedures	<ul style="list-style-type: none"> Element Champions – Operations Manager and Products Control Manager 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME
Training	<ul style="list-style-type: none"> Element Champion – HR Manager Operations Training Coordinator 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME
Contractor Safety	<ul style="list-style-type: none"> Element Champion – Procurement Manager Safety Contractor SME 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME
Management of Change and Pre-startup Safety Review	<ul style="list-style-type: none"> Element Champions – Operations Manager and Products Control Manager Process Specialist Engineering Engineer 	<ul style="list-style-type: none"> Hourly Committee Member Operations and Products Operators Maintenance Planner PSM SME
Mechanical Integrity	<ul style="list-style-type: none"> Element Champion – Maintenance Manger Maintenance Supervisor 	<ul style="list-style-type: none"> Hourly Maintenance Committee Member PSM SME
Safe Work Practices (Including Hot Work Permits)	<ul style="list-style-type: none"> Element Champion – ES&S Manager Safety Supervisor Operations or Products Supervisor 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME Operations or Products Operator
Incident Investigation	<ul style="list-style-type: none"> Element Champion – ES&S Manager 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME
Emergency Planning and Response	<ul style="list-style-type: none"> Element Champion – ES&S Manager Security & Emergency Response Supervisor 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME Fire Chief
Compliance Audits	<ul style="list-style-type: none"> Element Champion – ES&S Manager 	<ul style="list-style-type: none"> Hourly Committee Member PSM SME

SITE PLAN APPROVALS:

 <hr style="border: 0.5px solid black;"/> Human Resources Manager	1/29/20 <hr style="border: 0.5px solid black;"/> Date
 <hr style="border: 0.5px solid black;"/> ES&S Manager	1-29-20 <hr style="border: 0.5px solid black;"/> Date

Revision History

Document Complete the following table for each document revision.
Revision History

Rev. No.	Description of Change	Author	Approved By	Rev. Date	Effective Date
0	MOC 69223 – Original Issue, supersedes TRD Employee Participation Site Plan (H062-EP-TC) and GBR Employee Participation Site Plan (GBR-HESS-PS1.3)	R. Pierce	K. Hightower	01/29/2020	01/29/2020

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