

Needs review & approval

CONDEA VISTA - ABERDEEN PLANT
PROCESS SAFETY MANAGEMENT MANUAL
EMPLOYEE PARTICIPATION

Page 1 of 4
Revision 3
PSM-002

Approved by _____
Dan A Miller, Process Safety Manager
D.

JEB

1 0 PURPOSE

The intent of the Employee Participation Plan is that the knowledge and experience of plant employees and contractors are utilized in the development and implementation of Process Safety Management programs, to provide for a cooperative participatory environment and necessary flow of information from management to employees and contractors and from employees and contractors to management on process safety issues, and to ensure that information developed under the Process Safety Management standard is available to all employees and contractors involved in the process which in turn is targeted to eliminate or mitigate the consequences of catastrophic releases of highly hazardous chemicals in the workplace

2 0 SCOPE

This standard applies to the Aberdeen Plant covered by the OSHA regulation for Process Safety Management of Highly Hazardous Chemicals (Reference 29 CFR 1910.119 (c) and Applicability PSM-001) This standard is to assist in developing and documenting site specific, detailed implementation and compliance plans for Employee Participation, paragraph (c) of the regulation

3 0 GENERAL

A letter has been issued by the Plant Manager to all employees, their representatives and contractors regarding the Process Safety Management program as a standing statement of the facility's policy for ensuring compliance with PSM. The letter affirmatively solicits the suggestions, concerns and involvement of employees, contractors and their representatives, who by virtue of their job responsibilities, actual knowledge or representative positions, can reasonably be expected to make substantive contributions to the development and evaluation of specific elements of PSM. This letter has been posted on the bulletin boards throughout the plant and is located in the plant's Document Management System/PSM Compliance/ Employee Participation/Communications

The Aberdeen Plant supports involving employees in those activities and functions with which they can beneficially apply their experience and expertise. In the area of Safety, employees shall be routinely involved in incident investigations, process safety studies, and the like, based on their knowledge and experience in the area under investigation

Employees are selected based on their experience and expertise to assist in the various aspects of PSM. This will include such things as participating in process hazard analyses and incident investigations, writing operating procedures, collecting process safety information, and reviewing P&ID's

4.0 ACTION PLANS

4.1 PSM Awareness Training

- 4.1.1 All employees and contractors working in or near a covered process will receive Process Safety Management Awareness Training

- 4.1.2 This training will provide an overview of the requirements of the OSHA Process Safety Management regulation, including where and how information developed under the standard can be accessed

4.0 ACTION PLANS - Continued

4.1 PSM Awareness Training - continued

- 4.1.3 The Management Systems Coordinator or designee conducting the training will be responsible for documenting the training format and training attendance. The training documentation will be maintained electronically in the Human Resources Department.
- 4.1.4 The Management Systems Coordinator shall be responsible for ensuring that PSM Training occurs for all employees, covered contractors, and their representatives.
- 4.1.5 The Safety Department shall be responsible for ensuring that Safety Orientation Training occurs for all new employees and contractor representatives.

4.2 Process Hazard Analysis (PHA)

- 4.2.1 Employees, contractors and their representatives will be involved and consulted about the conduct and development of process hazard analyses (Re (e) Process Hazard Analysis)

4.3 Initial Training

Each employee presently involved in operating a process, and before being involved in operating a newly assigned process, shall be trained in an overview of the process and in the operating procedures as specified in paragraph (f) of the regulation.

4.4 Refresher Training

- 4.4.1 Employees and contractors involved in the operation of the covered process(es) shall be consulted to determine if the frequency of Refresher Training should be increased or decreased.
- 4.4.2 If portions of the Refresher Training are required by other regulations or corporate standards, the determination of frequency for these portions will not be less than required by regulation or standard (Re (g) Training)

4.5 Training for Process Maintenance Activities

- 4.5.1 Maintenance employees involved in maintaining the on-going integrity of process equipment shall be trained in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner (Re (J) Mechanical Integrity)

4 0 **ACTION PLANS** - Continued

4.6 **Management of Change**

4 6 1 The Management of Change Authorization process is the key to management of process safety as required by the OSHA PSM Regulation. This procedure establishes a system for managing process changes to cover processes at the Aberdeen Plant. Included in this procedure are requirements and authorities for making changes to process chemicals, technology, equipment, and procedures. Employees involved in operating a process, maintenance and contract employees whose job tasks will be affected by a change in the process shall be informed of and trained in the change prior to start-up of the process or affected part of the process (Re (j) Mechanical Integrity, (1) Management of Change)

4 7 **Incident Investigation**

4.7.1 Employees and contractors (if the incident involved work of the contractors) will be involved in conducting Incident Investigations and in implementing changes resulting from the Incident Investigation (Re (m) Incident Investigation Procedure)

4 7 2 The Unit Manager will be responsible for forming a team to conduct all Incident Investigations

4 7 3 Incident Investigation teams must include at least one person knowledgeable in the process involved in the incident. Other team members must have the appropriate knowledge and experience to thoroughly investigate and analyze the incident

4.8 **Compliance Audits**

4 8.1 Compliance Audits will be conducted every three years. The audit shall be conducted by at least one person knowledgeable in the process. A prompt response to the audit will be determined and documented. The two most recent compliance audit reports will be retained (Re (0) Compliance Audits)

4.9 **Employee Concerns**

4.9.1 Employees and contractors shall submit in writing to their supervisor any concerns, suggestions for improvement or PSM procedure nonconformances identified

4 9 2 The supervisor who receives these concerns shall have the responsibility of communicating the information to the Unit Manager. The Unit Manager shall review the information and address the issue within 30 days. Management has the right to pursue an alternative course of action of its own or not to act on each concern or suggestion presented, but in either case, a response explaining Management's position on the issue must be provided within 30 days

4.9.3 Documentation of both the employee concern and the management response will be retained in the Document Management System

5.0 ACCESS TO PROCESS SAFETY INFORMATION

- 5.1** All PSM documentation will be maintained as shown in the Document Management System
- 5.2** The Plant Manager shall issue a letter once yearly to all employees, contractors, and their representatives informing them of their right to access information developed under PSM and to inform them that their process safety concerns, suggestions for improvement or identification of program nonconformances are welcome
- 5.3** Employees, their representatives and contractors will be provided access to information developed under PSM through
- 1 PSM Manual
 - 2 PSM Implementation
 - 3 Access to PSM Documents
 - 4 PSM Training
 - 5 PSM Van Articles or Aberdeen News
 - 6 Letter from Plant Manager
 - 7 PHA Team Notification
 - 8 Document Management System
 - 9 Incident Investigation Reports

6.0 DOCUMENTATION/RECORDKEEPING

- 6.1** Where consultation and employee participation are required, the plant shall document these activities with memos, meeting minutes, etc to provide a means of demonstrating that the standard's intent has been satisfied
- 6.2** The person(s) having responsibility for maintaining the documentation is specified in each written action plan for each element
- 6.3** The Document Control Coordinator will be responsible for updating all Process Safety Management files as needed. Retention of documentation of employee participation and /or involvement will be limited to the minimum necessary to demonstrate satisfactorily that employees are involved in PSM activities as necessary. This will require retaining the most recent 3-5 years of documentation, however, if the documentation necessary to demonstrate compliance with a particular element occurs less frequently, the documentation will be retained longer

7.0 REVISION HISTORY

Description of the Change	Revision
General Revisions	1
Company Name Change	2
Changes in location of documents (ex remove trim) /Change Owner to DAM	3