

Doc Custodian: Cody Johnson	 Marathon Petroleum Company LP	Doc No.: HSS-021 Rev No: 1
Approved By: Mike Kulakowski		Health Safety Standard
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HSS-021 Injury Illness Prevention Plan

Overview

Purpose This document was prepared to meet the requirements of Title 8, California Code of Regulations (CCR), Section 6760, 3203 "Injury and Illness Prevention Program". Each of the elements outlined in this document have been implemented and are being conducted. Marathon Petroleum Company Los Angeles Refinery's Injury and Illness Prevention Program addresses each of the following areas:

- Authority and Responsibility
 - Employee Compliance
 - Communication
 - Joint Health and Safety Committee (JH&SC)
 - Identification and Evaluation of Workplace Hazards
 - Investigation of Occupational Injuries and Illnesses
 - Correction of Unsafe Work Practices or Procedures
 - Training
 - Record Keeping and Documentation
-

Scope The elements of this program are applicable to Marathon Petroleum Company Los Angeles Refinery which includes Carson operations, Wilmington operations, Sulfur Recovery Plant, and Watson Cogeneration operations.

Records Retention Printed copies of this document should not be retained more than 12 months. Any revision to this document will be retained a maximum of 10 years following the revision.

Supersedes This document supersedes Wilmington HSP- 698320, Carson Operations Injury and Illness Prevention Program, Calciner - WC-F/S 006.

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References

The following regulatory and voluntary standards were referenced while writing this instruction:

- 29 CFR 1910.120 Hazardous Waste Operations for Emergency Response
- Title 8, California Code of Regulations (CCR), Section 6760, 3203 "Injury and Illness Prevention Program"

The following MPC LAR standing instructions were either referenced while writing this instruction or are required to be referenced when complying with this instruction:

SI#	Title
HSS-110	Medical Emergencies, First Aid and Reporting Injuries/Incidents
HSS-012	Incident Reporting/Investigation
SAF-065	Medical Surveillance
SAF-066	Fixed Area Monitors
HSP-612390	Fire Protection Systems Program
ERP	Emergency Response Plan Rev. 4
HSS-305	Hazard Communications Program
HSS-306	Respiratory Protection Program
EO-001	Authority to Stabilize, Slowdown, Shutdown and Restart Operating Units
O-210	Operations Training Policy
O-200	Operating Procedures Requirements and Guidance
MNT-001	LAR Maintenance Procedure
PSM-002	Management of Change
HSS-001	Procedures Policy
EPPS	Employee Positive Performance System
COVID-19	COVID-19 Re-entry Plan

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Authority and Responsibility

Refinery Manager The Refinery Manager is the individual ultimately responsible and authorized to implement all safety and health programs for MPC LAR.

ES&S Manager The Environmental, Safety and Security Manager directs and advises LAR Management with regards to all matters relating to health and safety. The ES&S Manager is responsible for maintaining all established health and safety programs.

**Operations/
Product
Control
Managers** These positions are responsible for the day-to-day operation of the refinery process units, storage, blending and shipping facilities to produce and ship specification products. Priorities relative to this function are:

- a) Ensure the safety of refinery personnel,
- b) Ensure compliance with all environmental regulations and avoid any negative impact of the refinery on the community,
- c) Meet throughput and product specifications,
- d) Minimize the cost of production.

Maintenance Manager This position is responsible for estimating, planning, and execution of maintenance requirements of LAR in the most effective manner, safely, and in compliance with applicable laws and regulations.

Health Superintendent This position is responsible for providing professional advice in the administration of the LAR Health Programs to include industrial hygiene monitoring and compliance monitoring of the written health procedures implemented. The Health Superintendent administers activities related to protecting employees' health and promoting healthful work practices. The Health Superintendent coordinates follow-up on health issues and findings requiring resolution.

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Process Safety Superintendent This position is responsible to manage and provide professional advice and coordination in the administration of process hazard analyses, such as HAZOPs of existing units, and managing internal and external Health & Safety audits. This position is also responsible to maintain systems that support all EH&S departments including incident reporting, tracking and investigation; compliance management; document and record management; and audits.

Training Supervisor This position coordinates initial and refresher training of compliance requirements along with operations and maintenance personnel qualification training. Aids in the training of facility personnel on health and safety issues.

Human Resources Manager This position is responsible to advise and assist management in the safe and effective deployment and utilization of the total human resources of the facility. This function will support the administration of employee counseling and discipline programs as well as records maintenance, benefits programs, etc. The medical department also works with this manager receiving direction from corporate.

Medical Services Clinician This position reports to the Regional Medical Clinic Manager and is responsible for providing medical care to refinery personnel including injury/illness medical treatment, medical examinations, and maintaining medical records. This position also administers the employee drug and alcohol-testing program.

Employees While the EH&S Department has ultimate responsibility for implementation of all Health and Safety programs, each employee, as a condition of employment, is responsible for maintaining the workplace in a safe and healthful manner by observing all established health and safety practices at all times. Enforcement of all established health and safety practices and procedures is the responsibility of the front-line supervisor. With this responsibility, front-line supervision has authority and support from LAR management to achieve compliance.

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**Health and
Safety
Committees**

These committees assist MPC-LAR management to communicate, coordinate, develop, and implement health and safety activities. Committees include

- a) Joint Health and Safety Committees - LAR has established a Joint Labor Management Health and Safety Committee, consisting of equal Union and Company representatives. The Committee normally meets monthly for the purpose of jointly considering, inspecting, investigating and reviewing health and safety conditions and practices.

- b) Contractor Safety Council - This committee has the mission to “To bring us together in an equal partnership and to strive to improve the Health, Safety, and Environmental program of MPC LAR. By partnering, open communication, and effective cooperation, we will work as a team to institute safety as the first priority in our joint pursuit of quality production.” The committee holds multiple organizational and communication meetings monthly and performs weekly field audits.

- c) Policy and Procedures Committee - This committee is responsible for reviewing any updates to Health and Safety Policy and Procedures used across the Refinery. The committee is comprised of operations, maintenance and safety personnel (both USW represented and management) and subject matter experts. The committee meets weekly ensuring the Health and Safety Standing Instructions are complete with timely updates.

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Employee Representatives

- a) USW Health and Safety Representatives - The USW H&S Representative is selected by the JH&SC and reports functionally to the Safety Supervisor. There are three USW H&S Representative positions, and the selected union-represented employees serve a term as defined by the applicable Collective Bargaining Agreement. The H&S Representatives also serve as a conduit for employees to communicate health or safety issues and are expected to help resolve issues and provide feedback to employees as necessary.
- b) USW Process Safety Representatives – There are two USW Process Safety Representatives that report functionally to the PSM Supervisor. Their job scope includes: membership on Process Safety Committees, fielding concerns and encouraging input from employees, participating in development and delivery of PSM training, participating in MOC meetings, serving on PSM-related investigations and auditing PSM-related work processes.

Employee Compliance

Training

Employee training is recognized and emphasized as one of the key components for prevention of injuries and illnesses. The details of the MPC Los Angeles Refinery - training program relating to health and safety are discussed in the section titled - EMPLOYEE TRAINING.

Recognition Programs

- a) Refinery Management - Recognition of significant milestones for the entire refinery is provided by refinery management. Management recognizes groups/departments maintaining significant incident free periods.
- b) Sequential Safety Meetings - Noteworthy accomplishments are highlighted in monthly safety material to provide recognition to individuals or activities that contribute to safety and health.
- c) Start Safe Stay Safe challenge coin program - This program seeks to drive focused efforts by all LAR personnel and Contractors to execute their work with a commitment to excellence in Safety, Environmental and Process Safety Performance and provide recognition for their efforts in the form of a challenge coin.
- d) MAR Awards provide a way to recognize and reward employees who demonstrate behaviors and achieve results that support our business values.

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Disciplinary Policy Compliance with all established health and safety practices and procedures is a condition of employment for all employees. Infractions of established health and safety practices and procedures shall be managed in accordance with the established disciplinary policy. For more information contact the Human Resources Department.

Field Observation Process MPC Los Angeles Refinery employees and contractors regularly conduct jobsite/permit audits. Audit results are tabulated monthly (except during Turnaround periods where they are tabulated daily) and results are evaluated by the Safety Department to identify trends.

Drug and Alcohol Program Pre-employment testing is completed on new employees. In addition, employees in “safety sensitive” positions, where there is a potential risk to refinery safety, are included in a random D&A testing program administered by the Medical Department.

Compliance Audits Comprehensive compliance audits are coordinated on a triennial basis by MPC LAR EH&S Process Safety organization. Annual audits are also led by the PSM Department and include members of the Health and Safety departments. The objective is to identify gaps in Health, Safety and PSM processes and compliance. Both employees and contract workers are audited for compliance.

Performance Evaluations Annual performance evaluations are given to salaried employees and provide feedback on their work performance. This can be used to recognize positive performance and provide feedback when improvement is needed. For more information contact Human Resources.

Contractors To help ensure health and safety involving contractors performing work at MPC LAR a number of requirements/programs have been established.

- a) Contractor Health and Safety Programs - This establishes health and safety requirements for contractors working in the refinery. The program includes two key elements:
 1. Contract Company Vetting - Vetting is based on a corporate scorecard that includes company safety performance, written

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program quality and OSHA violation history. Companies must achieve an acceptable grade in the scorecard to be allowed to work at the facility, or be granted a temporary approval which requires approval of the Refinery Manager.

2. Site Access for individual contract company employees. Site Access assures that individual contract company employees meet training and other qualifications to gain access to the site. For field employees performing work in process areas these qualifications include:
 - a. 20 hours of Advanced High Hazard Facility Training as specified in SB-54. This consists of 3 classroom modules: Principles of Refining, Refinery Safety Orientation and Safety as it Pertains to Crafts. Based on work scope (e.g. not working in process areas) some of these classes may not be required. LAR will periodically verify SB-54 training for core contractors.
 - b. LAR site-specific and Safe Work Permit web-based training modules.
 - c. Active status in in the ASAP or DISA drug testing program (or an equivalent).
 - d. Background check meeting company requirements.

- b) Drug and Alcohol Testing - Contractor companies and their employees working unescorted in the refinery are required to be part of the ASAP or DISA Program. This is a third-party D&A program that includes participation by other refineries in Southern California. The program consists of pre-employment and random D&A testing of contractor employees.
- c) Contractor Safety Council Audits – MPC Los Angeles Refinery supports and encourages this committee, made up of contractor companies working at the facility. One of the activities this committee performs is safety inspections of contractors working in the refinery to help assure safe work practices are followed. There are multiple teams conducting these audits on a weekly basis. During meetings of the Contractor Safety Council (CSC), Contractors review audit data quarterly and provide corrective action plans for results showing high percentages of at-risk findings.

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Communication

General MPC LAR communicates with employees in matters of safety and health in a variety of ways, including, but not limited to the items listed below.

Orientation New employee orientation and training programs.

Meetings Regularly scheduled meetings in which pertinent safety or health concerns are discussed.

- Sequential Safety Meetings are held monthly, attended by all employees and covers general and/or specific information and statistics about LAR, or a specific topic related to a recent incident. Contractors receive the material as well and present it to their company employees as a part of their safety meeting process.
- Daily Operations meetings attended by facility leadership begin with safety events and safety information.
- Joint Health and Safety Committee meetings are held monthly.
- Contractor’s Safety Meetings are conducted by the contractors for their employees and their subcontractors on a weekly basis.

Standing Instructions and Programs Standing Instructions or programs are issued when a policy or procedure is established. The Standing Instructions are available to every employee on the DMS system. Revisions are made to the existing Standing Instructions as necessary with a centralized system maintained for control, approval, and distribution of the revised instructions.

Notices Notices are distributed and/or training modules are issued to all employees when a new program or procedure is first implemented or updated.

Incident Investigation Learning Briefs Learning Briefs are periodically issued to all departments for discussion and identification of lessons to be learned from incidents that may have taken place at LAR or other MPC facilities.

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Bulletin Boards Bulletin boards are maintained throughout the facilities for employee communication. Copies of letters, Learning Briefs, and Safety Statistics are often posted for easy access and review by all employees.

Joint Health and Safety Committee

General MPC LAR maintains a Labor/Management Safety Committee in accordance with the contractual agreement between MPC LAR and the United Steel Workers (USW). The Labor/Management Committee is known as the Joint Health and Safety Committee (JH&SC).

Composition The JH&SC size and membership is implemented as specified in the Collective Bargaining agreements.

Scheduled Meetings and Minutes The JH&SC normally meets on a monthly basis. On occasion, a monthly meeting may be canceled due to difficulties in scheduling which result in the lack of a quorum of committee members. Minutes are maintained for each meeting held. Each member is given the opportunity to review the minutes and provide his/her approval prior to distribution to the refinery. In addition, the minutes are distributed for review to the various MPC LAR staff members. The JH&SC Facilitator maintains copies of the Joint Health and Safety Committee minutes.

Workplace Hazards – Ongoing Inspection and Evaluation

General Inspections The following inspections are conducted for the identification, evaluation, and correction of workplace hazards.

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Item Inspected	Frequency	Applicable Instruction/Program
Area Assessments	Daily and Monthly	<i>See block below</i>
Fire Extinguishers	Monthly and Annual	FS-131/SAF-025 Fire Protection and Systems
Fire Hoses	Annual	FS131/SAF-025 Fire Protection and Systems
Fire Deluge/Sprinklers	Semiannual and Annual	FS-131/SAF-025 Fire Protection and Systems
Fixed Gas Detection	Monthly and Quarterly	HSS 404-Hydrogen Sulfide Exposure Prevention
SCBAs	Monthly	HSS-306 Respiratory Protection
Medical Surveillance	As Required	SAF-065 Medical Surveillance
Industrial Hygiene Monitoring	As Required	IH Management

Area Assessment Program

Facility inspections are completed on an on-going basis. The Area Assessment Program is performed through daily checks performed by work group personnel. Deficiencies and observations are addressed by operations immediately or managed through the routine maintenance process.

Work Area Inspections

Regular inspections are conducted by front-line supervisors of work areas under their supervision. In addition to maintaining good housekeeping, identification and abatement of potentially hazardous conditions and work practices are made. The Area Safety Representatives also make periodic inspections of the various work areas for the purpose of identifying and correcting any potentially hazardous conditions or work practices.

COVID-19 Pandemic Plan

MPC LAR has developed a COVID-19 Pandemic plan to reduce the risk of infection from the COVID-19 virus while working in the refinery. The plan requires managers to identify essential employees and non-essential employees who are able to work remotely. The re-entry plan for non-essential employees is based on a slow and methodical approach to bringing employees that are currently working remotely ~~from home~~ back to the Refinery in phases. Each phase must be in place and all requirements met and continue to be met before the next phase will be implemented.

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In the event of an outbreak at the Los Angeles Refinery the Refining Positive Case Response Plan will be implemented. The plan consists of three areas; Initial Response & Notifications, Affected Area Cleaning, and Contact Tracing.

The MPC LAR COVID-19 Pandemic Plan can be found at this link:
[COVID-19 Pa2ndemic Plan](#)

Contractor Inspections

Audits of Contractor work activities are conducted by the MPC LAR front-line supervisor and the Area Safety Representative on a frequent basis.

Process Hazard Analysis

Analyses are conducted on a scheduled basis on refinery processes to identify and evaluate potential causes and consequences of non-routine uncontrolled emissions, fires or explosions where death or serious bodily injury to workers could occur. The primary method for this is Hazard and Operability Studies (HAZOPs). Other methods, such as What If and Checklists, are used depending on the specific process and analysis requirements. Findings which meet Process Safety Management (PSM) regulation requirements are reviewed and tracked for resolution. More details are available in DMS under "PSM Compliance Information" and "Process Hazard Analysis". For more information -- contact the PSM dept. 310-847-3871.

Fire Dept. Permits

Local Fire Departments evaluate, and issue permits to MPC LAR regarding hazardous materials, flammable liquids, and compressed gases. Permit requirements include maintaining a Hazardous Material Management Plan and a hazardous materials inventory.

Refinery Permit Program

To help ensure safe operations and work conditions, the refinery has permit programs to control work which may have or involve potential hazards in operating units. Assessments are required of maintenance, inspections or other work to be performed in operating areas of the refinery depending on the type of work to be performed. Appropriate controls are implemented based on the work to be performed and operating conditions.

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Professional Health and Safety Staff

The refinery has full time professional health and safety personnel who regularly evaluate potential hazards and workplace conditions and work with refinery personnel to mitigate when appropriate. The H&S Staff are also involved in evaluations conducted on proposed modifications to the refinery involving new processes or equipment that will require capital expenditures.

Workplace Hazards – Introduction of New Hazards

SDS Review

When a new chemical or material is to be introduced to any work area, a review of the SDS is made by the Health & Safety Professional. See HSS-305 Hazard Communication Program for more information.

Occupational Health Review

Industrial Hygiene Study - Depending on the nature of the change in process, procedure, or equipment, an industrial hygiene survey may be conducted in order to determine any changes in potential employee exposure levels. These surveys are most often conducted for process changes where the process constituents have been changed substantially or in the case of the introduction of additional noise sources. Studies may also be initiated if employees express concerns regarding potential exposures.

Design Review

Proposed changes in process, procedures or equipment are reviewed by a number of individuals whose expertise and background qualify them to make these reviews. These individuals provide a wide base review and may include design engineers, process engineers, mechanical engineers, safety engineers, and electrical and instrument engineers.

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Process Safety Management MPC LAR has a Process Safety Management Program. An integral part of this program incorporates the evaluation of changes in processes, procedures, or equipment prior to the implementation of the change. HAZOP is a methodical approach to identify potential hazards. As a result of HAZOP, follow-up recommendations are made, and these recommendations are assigned and tracked until resolution. All changes to the process units are reviewed per PSM-002 Management of Change.

Management of Change (MOC) To identify and evaluate hazards that may result from process changes written procedures have been established in Management of Change Procedure PSM-002. Changes to other aspects, such as instrumentation and operating procedures, are also reviewed via procedures to help ensure appropriate process safety evaluations are completed. More details are available in DMS under "MOC (process management of change)". For more information -- contact the PSM dept.

Pre-Start-Up Safety Review (PSSR) In addition to Management of Change procedures, parts of the facility which have undergone significant modification undergo a review prior to start-up. This is to help ensure any new process hazards have been evaluated and addressed. For more information -- contact the PSM dept.

Workplace Hazards – Discovery of New or Previously Unrecognized Hazards

Suspend Work Obligation Both MPC LAR employees and contractors are authorized and obligated to immediately suspend work that is unsafe or presents a danger to personnel and to ensure a safe resolution is in place before proceeding with the work.

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**Safety 1
Workshop**

Safety 1 is a safety leadership workshop where MPC LAR employees are introduced to hazard identification/recognition techniques:

- a) Stop Look Analyze Mitigate (S.L.A.M.) is a hazard awareness technique used at MPC LAR to identify hazards of a task to be performed.
- b) Go No Go – A personal assessment LAR employees use prior to conducting a task.
- c) Plug the Cheese - A review of barriers to hazards to ensure they are in place to prevent an incident or injury.

**Physical
Hazard**

If a new or previously unrecognized physical hazard is discovered:

- Safely mitigate the hazard or barricade the area using caution tape or other means.
- Submit a notification for correction.
- Notify a supervisor.

**Procedural
Hazard**

If a procedure is discovered to be incomplete or contains wrong information that could lead to a new hazard, follow the steps provided in MNT-001, O-200 and HSS-001 Development and Review Process, for procedure revision or deletion.

**Process Related
Hazard**

If a process related hazard is discovered, follow the mitigation steps and guidelines provided in EO-001 Authority to Stabilize, Slowdown, Shutdown and Restart Operating Units. Report the hazard to supervision for correction.

**Correction of
Hazards**

Correction of any new or previously unrecognized hazard is dependent upon the type, severity and risk from the hazard.

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Employee Reporting of Hazards and Incidents

Employee Reporting of Incidents

The employee reporting of near misses/workplace hazards is encouraged and provides an opportunity to report new or previously unrecognized hazards, as well as to foster self-awareness among both MPC LAR employees and Contractors. HSS-012 Event and Investigation Management covers incident reporting.

Employee Reporting of Hazards

With any hazard, employees are strongly encouraged to report those hazards to their supervisor for correction or they may use the Hazard Reporting Form (see HSS-002) available on the MPC LAR intranet or a hard copy at locations throughout the plant.

Investigation of Injuries and Incidents

Reporting of Injuries

MPC LAR requires employees to report all work-related injuries or illnesses in a prompt manner. These procedures are outlined in HSS-012 Incident Investigation and HSS-110 Medical Emergencies, First Aid and Reporting Injuries. Failure to report any work-related injuries or illnesses is subject to disciplinary action being taken.

Investigation of Injuries and Incidents

Investigation of injuries and incidents are covered under:

- Reporting and Initial Investigation – HSS-012 Incident Investigation cover incident reporting.
- In-depth Investigation – HSS-012 Event and Investigation Management specifies investigation requirements.

Statistics and Data

Statistics are compiled each month regarding the injuries and illnesses sustained. Included in this tracking, is the following information: the Area or department to which the employee belonged, the type of injury (burn, strain, abrasion, etc.), the department where the injury occurred, the severity of the injury, (i.e., first aid, OSHA recordable, or lost-time), the body part affected, (i.e., eye, finger, arm, back) and activity causing injury, (i.e., fall, trip, lifting). Tracking injuries in this manner provides the opportunity to review trends

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that may be occurring and allow additional measures or programs to be implemented in order to prevent these injuries from reoccurring.

Contractors

Contractors performing work within the MPC LAR facilities are required to maintain an injury and illness investigation procedure. The contractor is required to submit the injury investigation report and Employer’s First Report of Injury or equivalent as applicable for each injury occurring at the MPC LAR facility. MPC LAR reserves the right to review the contractor’s remedial action taken for any work-related injury or illness.

Litigation

In preparation for litigation, an investigation may be conducted at the request of and under the direction of MPC LAR’s Law Department. The investigations in these cases may be maintained confidential under the attorney-client privilege and work product doctrine.

Correction of Unsafe Conditions, Practices or Procedures

Abatement

Abatement is the preferred method of addressing any identified hazard. Each employee is authorized to use Suspend Work Obligation when confronted with any identified hazard.

Correction

Identified hazards, which are beyond the scope of the employee’s job responsibilities or hazards that are not readily abated, shall be promptly reported to the immediate supervisor. Priority shall be given to alerting and removing all non-essential personnel from the work area. After removal of personnel, the hazard will be evaluated and measures developed to abate the hazard. The work order process will be utilized to initiate the correction of any hazards.

As deemed necessary, the Emergency Response Plan may be engaged. MPC LAR maintains an Emergency Response Organization that is specifically trained to respond to refinery-specific hazards that may arise. An electronic or hard copy of MPC LAR’s Emergency Response Manual is available for review.

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Closure Hazards are considered as “corrected” when the defined hazards have been abated or properly mitigated.

Training – New Employee, Operations and Maintenance

General MPC LAR has established training programs for all its employees. The purpose of all training is to provide the employee with the necessary work skills and knowledge regarding safe work practices to be followed so that the employee may perform the work task in a safe manner.

New Exempt Employees New exempt employees, complete Health and Safety training which includes the following topics:

- Hazard Communication
 - PSM
 - Personal Protective Equipment
 - Emergency Alarms/Evacuations
 - Respiratory Protection
 - Safe Work Permit Program
 - Hearing Conservation
 - Energy Isolation
 - Fire Extinguishers
 - Confined Space
-

New Employee Training Initial orientation and training has been established for both operations and maintenance (direct hire or salary) new employees at the beginning of their employment. The New Employee Training is a multi-week course for the orientation and training of all new hourly employees both operations and maintenance. The new employee training strongly emphasizes the various safety aspects associated with work in the refinery environment and is designed for persons with little or no prior refinery or related experience. Training is conducted at the administration building but includes field trips to refinery units both to familiarize new employees with the refinery and to provide instruction on specific pieces of equipment.

The Safety Topics covered in the New Employee Training are presented by the EH&S personnel and include the following:

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- Hearing Conservation
- Respiratory Protection
- Fall Protection
- Scaffold User
- Hazard Communication
- Toxicology and Chemical Hazards
- Energy Isolation
- Confined Spaces
- Gas Detection Instruments
- Work Permit Procedures
- Fire Extinguisher Use
- Emergency Response/Evacuation Procedures
- Reporting of Injuries
- Environmental Work Practices and Considerations
- Safe Work Permitting
- PSM

**New
Maintenance
Employees**

New employees being assigned to maintenance are generally hired based on their previous experience and/or education.

**New
Operations
Employees**

In addition to the initial new employee training previously discussed, additional operations training is given per standing instructions O-210 Operations Training Policy and the Operations site training plan MCC (Master Curriculum Catalog).

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New Job Assignments or Position

Employees receive additional training when they change job positions, or their job responsibility changes. The nature and extent of this training depends on the job position and related job duties.

- Maintenance - The employee receives instructor-led training from subject matter experts and on-the-job training by working with another employee who is familiar with that particular job skill or responsibility.
- Operations - Defined training is given prior to a new job assignment. Operators transferring to another department receive new operations employee training for the department to which the employee is transferred, as outlined previously. The training is specific for the particular department in which the employee is transferred, and the trainee is trained as if he/she were a new employee in the Department (at the Outside Operator level).
- In addition to a transfer to another department, an employee may acquire a new job assignment by progressing to higher classifications within the same department. This progression is based upon the seniority system and successful completion of the established job skills while training for the position.

Operations and Maintenance Refresher Training

Each Operations and Maintenance employee conducts annual refresher training at the department level that focuses on the employee’s job requirements and on areas which may need individual improvement. These areas are identified through observations, testing and peer review within the department. The intent of refresher training is to strengthen the employee’s knowledge and skills for their everyday job requirements.

Training – ERT and Hazwoper

Emergency Response Team Training

In addition to the annual safety training, designated members of the Emergency Response Team (ERT) are given additional specific emergency response related training. This training includes monthly training, quarterly in-Refinery training, monthly hands-on emergency response drills, periodic and outside training i.e. Texas A&M University.

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Hazwoper Training

MPC LAR has determined the provisions of 29 CFR 1910.120 apply to Marathon Petroleum Company Los Angeles Refinery in two respects. First, the provisions of the emergency response portion of the regulation apply to the facility’s emergency response organization in the event of a hazardous material spill. Second, and on a more limited basis, the provisions of the hazardous waste handlers’ position would apply to specified MPC LAR employees who by nature of their job responsibilities may be involved in the post-emergency cleanup operations.

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**Hazwoper
Level
Determinations**

In order to address the training requirements, MPC LAR has identified the following job classifications with respect to the level of training defined in the regulation:

- Awareness Level - All field personnel. These individuals are not part of the Emergency Response Team.
- Operator Level – Environmental, Health and specified members of the safety department, truck drivers, and Labor & Utilities personnel.
- Hazmat Technician Level - All ERT Members and all Emergency Response Instructors.
- Hazmat Specialist Level - Specified safety representatives
- Incident Commander Level - Emergency Response Team Captains, Designated Operations and Maintenance Supervisors and Managers, and Shift Foremen.

**Hazwoper
Training
Requirements**

The Hazwoper training requirements for each of the employees identified in the training levels outlined above has been accomplished as follows:

- Awareness Level - Annual safety training includes the regulatory training requirements specified and the MPC awareness web based training is assigned to all employees trained to this level.
- Operator Level - Annual safety training includes the regulatory training requirements specified and the MPC Operations web based training is assigned to all employees trained to this level.
- Hazmat Technician Level/Hazmat Specialist Level - Complete a 40-hour Hazwoper Training Course that meets CSTI requirements prior to being allowed to conduct hot zone activities as well as annual 8-hour refreshers and drills.
- Incident Commander Level - Individuals designated at this level attend specific outside training geared towards Hazwoper Incident Commander level.

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Refresher Hazwoper Refresher training shall be maintained on an annual basis for all levels by maintaining the structure of the annual safety training to include the required elements. Individuals designated at the Incident Commander Level shall periodically attend an outside training course or receive specific in-Refinery training on the Incident Command System.

Training – On-going and WBT

General Various methods of on-going training are utilized outside formal classroom training in order to facilitate an on-going communication of changes in processes, procedures, and equipment, introduction of new chemicals or materials, and identification of hazards. These include:

- Safety Meeting Material
 - Standing Instructions
 - Operating Procedures
 - Maintenance Procedures
 - Introduction of New Chemicals or Hazards
 - MOC Training through Daily Guidelines
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Web Based Training Web based training (WBT) is also a required element of the training program. This consists of topics in safety, operations, processes, maintenance, or general plant awareness.

Safety WBT generally covers those topics that are required by regulations to be provided on an annual basis.

Recordkeeping and Documentation

General MPC LAR maintains an extensive record keeping which is maintained/retained by the responsible department. Regarding the IIPP, the record keeping and documentation includes:

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- Communication
- Workplace Hazards
- Investigation of Occupational Injuries and illnesses
- Training Programs

Communications Communications with employees regarding occupational health and safety are recorded and retained as follows:

Item	Material	Method	Responsible Dept.
JH&SC	JH&SC meeting minutes	Written	Safety Dept.
Monthly Sequential Safety Meeting	Sequential Safety material, written sign in sheets	Electronic, Written	Learning & Development/Safety
Incident Investigation Learning Briefs	Investigation findings and corrective actions	Electronic	EH&S
Safety Statistics	Data spreadsheet	Electronic	EH&S

Workplace Hazards Programs for the identification and evaluation of workplace hazards are recorded and retained as follows:

Item	Material	Method	Responsible Dept.
Area Assessments	Assessment forms	Electronic	Fire & Safety Maintenance
Fire Extinguisher	Inspection forms	Electronic	Fire & Safety Maintenance
Fire Hose	Inspection forms	Electronic	Fire & Safety Maintenance
Fire Deluge/Sprinkler System	Inspection forms	Electronic	Fire & Safety Maintenance
SCBA	Inspection forms	Electronic	Fire & Safety Maintenance
MOC's	MOC Checklists	Electronic	PSM Group
IH Monitoring	Monitoring data	Electronic	Health
LOTO Audits	Audit forms	Written/Electro	Safety Dept.

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SDS Review	Letter of new chemical	Written	Health Dept.

Investigation of Incidents

Programs for the investigations of occupational injuries and incidents are recorded and retained as follows:

Item	Material	Method	Responsible Dept.
Injury and Illness Report	HSS-012	Electronic	Safety Dept.
Intelix Incident Report	HSS-012	Electronic	EH&S
Corporate Audits, Investigations	Reports	Written	EH&S
First Report of Injuries	State forms	Written	Medical Dept.

Training Programs

Programs for employee training are recorded and retained as follows:

Item	Material	Method	Responsible Dept.
New Employee Training	Tests and materials	Written	Learning & Development
Operator Training	Tests, Rosters, Evaluations	Written, Electronic	Learning & Development
Maintenance Training	Tests, Rosters, Evaluations	Written, Electronic	Learning & Development
New Job Assignment Training	Tests, Rosters, Evaluations	Written, Electronic	Learning & Development
Operator/Maint Refresher Training	Tests, Evaluations	Written, Electronic	Learning & Development
Annual safety training (WBT and in person)	Training rosters, Training material	Written, Electronic	Learning & Development
ERT Training	Training rosters	Written	Learning & Development
Hazwoper Training	Training rosters	Written	Learning &

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			Development
WBT	Completion Certificates	Electronic	Learning & Development

**Document
Revision
History**

The Marathon Petroleum Company Los Angeles Refinery Injury and Illness Prevention Program will be reviewed annually to ensure the elements meet current regulations and are applicable and adequate for MPC LAR. Complete the following table for each document revision.

Rev. No.	Description of Change	Author	Approved By	Rev. Date	Effective Date
0	New Document combining Wilmington, Carson and Calciner IPPs into one document with MPC updates.	Edward C. Johnson		###/###/2020	
1	Removed Calciner references, minor title changes and minor clarifications	Connie Lema	Mike Kulakowski	4/18/2024	4/18/2024