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<b>RESPONSIBLE DEPT.</b>	<b>CONTENT CUSTODIAN</b>	<b>APPROVED BY</b>	<b>LEGACY NUMBER:</b>	
HES&S	Terry Hering	Shannon Logan	PS-01	
<b>REVISION APPROVAL DATE:</b> 02/18/2021		<b>NEXT REVIEW DATE:</b> 02/18/2026		<b>MOC:</b> N
				<b>REVISION:</b> 0

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## 1.0 INTRODUCTION

### 1.1 Purpose

This procedure provides an overview of the implementation of the process safety elements and instructions for the management of documentation relating to Process Safety Management (PSM), OSHA 29 CFR 1910.119, WAC 296-67, and RMP 40 CFR 68.

### 1.2 Scope

All areas within the boundary limits of the Anacortes Refinery have been analyzed to determine if there are covered processes under OSHA 29 CFR 1910.119. Areas that are determined to be covered processes are subject to the elements of the PSM Standards, including PHAs.

The overall objectives of this procedure are to describe:

- How the elements of PSM are implemented.
- Personnel which are responsible for the implementation of each element.
- Records which are used to verify compliance.

## 2.0 REFERENCES

### 2.1 Marathon Standards, Policies & Procedures

- PSM-1070, Process Safety Management
- RSP-1302, PSM/RMP Process Safety Information (PSI)
- RSP-1303, PSM/RMP Process Hazard Analysis (PHA)
- RSP-1304, PSM/RMP Operating Procedures
- RSP-1305, PSM/RMP Operations/Products Control Training
- RSP-1305-001, Refining HESS Training Standard
- RSP-1305-003, Maintenance Training Standard Practice
- RSP-1306, PSM/RMP Contractors
- RSP-1307, PSM/RMP Management of Change (MOC) & Pre-Startup Safety Review (PSSR)
- RSP-1308, PSM/RMP Mechanical Integrity
- RSP-1309, PSM/RMP Safe Work Practices
- RSP-1310, PSM/RMP Incident Investigation
- RSP-1311, PSM/RMP Emergency Response and Planning
- RSP-1312, PSM/RMP Compliance Audit
- RSP-1313, PSM/RMP Trade Secrets

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## 2.2 Government Regulations

- OSHA 29 CFR 1910.119 PSM of Highly Hazardous Chemicals - Process Hazard Analysis
- EPA RMP 40 CFR 68 Chemical Accident Prevention Provisions - Process Hazard Analysis
- WAC 296-67 Safety Standards for PSM of Highly Hazardous Chemicals - Process Hazard Analysis
- CPL 2-2.45A: (Revised) Process Safety Management of Highly Hazardous Chemicals - Compliance Guidelines and Enforcement Procedures.
- CPL 03-00-010: Petroleum Industry Process Safety Management National Emphasis Program

## 3.0 ROLES AND RESPONSIBILITIES

### 3.1 Multiple Equipment Disciplines

Several of the requirements in this procedure apply to multiple equipment disciplines:

**Table 1 Multiple Equipment Disciplines**

Title	Location
Pressure Equipment SME	Inspection Department
Rotating Equipment SME	Shop I
Electrical SME	Trailer 10
Instrumentation SME	Trailer 10

Where applicable, reference is given back to this table by the use of (\*\*\*) .

### 3.2 Refinery Leadership Team

The Anacortes Refinery Leadership Team (RLT) has the responsibility to guide the development and implementation of a comprehensive plant-wide process safety management system that meets all local, corporate, and regulatory standards, guidelines, and requirements. Local safety goals are set by the RLT.

### 3.3 Manager of EHS


The Manager of EHS is responsible for implementation of the PSM Program. Managers of the various departments within the Anacortes Refinery have the responsibility to ensure implementation of each element of the PSM regulation 29 CFR 1910.119.

**Table 2 Key Positions Summary**

Title	Location	Phone
Refining General Manager	Admin Building	122
Manager ES&S	Admin Building	712

**ATTENTION:** Printed copies should be used with caution.

The user of this document must ensure the current approved version of the document is being used.

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**Table 2 Key Positions Summary**


Title	Location	Phone
Manager Technical Services	Admin Building	198
Manager Operations	Admin Building	688
Manager Engineering	Admin Building	115
Manager Maintenance	Admin Building	736
GP Manager (Supply Chain Manager)	Warehouse	185
Manager Human Resources	Admin Building	128
Safety Supervisor (PSM)	Admin Building	148
Operations Excellence Supervisor	Training Trailer	681
Manager, Products Control	Admin Building	717

### 3.4 PSM Elements of Responsibility

**Table 3 PSM Elements Responsibility**

PSM Element Title OSHA 1910.119	Title of Responsible Role
Overall Coordination	Safety Supervisor (PSM)
(c) Employee Participation	Manager Human Resources
(d) Process Safety Information	Manager Engineering
(e) Process Hazard Analysis	Manager Technical Services
(f) Operating & PM Procedures related to covered processes	Managers Operations, and Products Control
(g) Training	Managers Operations, and Products Control
(h) Contractors	GP Manager [Supply Chain (SC) Manager]
(i) Pre-Startup Review	Manager Operations, and Products Control
(j) Mechanical Integrity	Manager Maintenance
(k) Hot Work Permits	Manager ES&S
(l) Management of Change	Manager Operations, and Products Control
(m) Incident Investigation	Manager ES&S
(n) Emergency Planning and Response	Manager ES&S
(o) Compliance Audit	Manager ES&S
(p) Trade Secrets	Refining General Manager

**Note:** OSHA 29 CFR 1910.119 (a) applicability and (b) definitions have been interpreted at the inception of this regulation and the Anacortes Refinery equipment was evaluated per these PSM elements.

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## 4.0 REQUIREMENTS

All Anacortes Refinery-wide procedure references must be:

- Accessed from SharePoint to validate that the links work.
- Reviewed against the legal requirement to validate that the wording is present and appropriate.
- Non-electronic references to documentation must be physically located and validated as compliant with the legal requirement.
- References must be reviewed with responsible parties to ensure they are still in place and appropriate to the legal requirement.

All refinery-wide procedures are managed in accordance with R-63-001. Refinery-wide procedures that involve the safe and stable operation of covered processes are also managed under R-30-001. Refer to R-63-001 for a list of refinery-wide procedures that are managed under R-30-001 and the requirements of this procedure.

## 5.0 TRAINING

Training is completed on the PSM/RMP Overview for all Anacortes Refinery employees initially upon employment. LMS courses REF Process Safety Management Overview (101) ITEM\_REF\_09OSHPSM101, and MPC WBT Process Safety Management (Praxis) ITEM\_MPC\_00OSHPSM040. Listed below is information on the courses from the LMS. to satisfy part of the OSHA 29 CFR 1910.119 requirements for PSM training. The topics/learning objectives listed below are completed during this training.

- REF Process Safety Management Overview (101): (instructor-led training, 6 hours duration, initial training)

Upon completion of this training the participant will be able to:

- Explain the principles of process safety.
- Know the OSHA PSM and EPA RMP elements and recognize the element requirements.
- Identify key inter-relationships between PSM/RMP elements.
- Recognize the major differences between personal safety and process safety.

Learning Objectives:

- Understand the basic process safety principles and apply the principles in safety decision making.
- Identify the 14 PSM elements and recognize some of the requirements of the elements.
- Understand the principles associated with each PSM element.
- Understand how the 14 PSM elements work together.
- MPC WBT Process Safety Management (Praxis): (computer-based training, 0.83 hours duration, initial training).

This web-based training module is designed to raise awareness of Process Safety Management for Marathon employees with responsibilities directly related to the daily operation of a PSM regulated facility and for those employees that support PSM facilities at

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various levels in the corporation. The module includes an overview of Process Safety Management (PSM), and individual segments dealing with the fourteen elements that constitute PSM. After completing all module sections, trainees need to take the final test to receive credit in their training record.

Objectives:

- After completing the web-based training module, trainees should be able to: State the purpose of Process Safety Management (PSM). Identify the elements (14) of PSM. Recognize examples of PSM efforts in the organization. Draw relationships between process safety management expectations and what participants do at work. Demonstrate an understanding of the importance of PSM as a widespread effort shared among employees and contractors.

## 6.0 REVIEW AND REVISION HISTORY

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Revision #	Preparer	Date	Description
0	Mark Willand	4/10/2022	Reformatted and Numbered per Document Control Policy, R-63-001.

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## 7.0 ATTACHMENT 1 – REGULATION CROSS-REFERENCE

Element	PSM - WAC	PSM – OSHA	RMP
PSM of Highly Hazardous Chemicals	§ 296-67-001	§ 1910.119(a)	Subpart A § 68.10
Definitions	§ 296-67-005	§ 1910.119(b)	Subpart A § 68.03
Employee Participation	§ 296-67-009	§ 1910.119(c)	Subpart D § 68.83
Process Safety Information	§ 296-67-013	§ 1910.119(d)	Subpart D § 68.65
Process Hazard Analysis (PHA)	§ 296-67-017	§ 1910.119(e)	Subpart D § 68.67
Operating Procedures	§ 296-67-021	§ 1910.119(f)	Subpart D § 68.69
Training	§ 296-67-025	§ 1910.119(g)	Subpart D § 68.71
Contractors	§ 296-67-029	§ 1910.119(h)	Subpart D § 68.87
Pre-Startup Review	§ 296-67-033	§ 1910.119(I)	Subpart D § 68.77
Mechanical Integrity	§ 296-67-037	§ 1910.119(j)	Subpart D § 68.73
Hot Work Permit	§ 296-67-041	§ 1910.119(k)	Subpart D § 68.85
Management of Change	§ 296-67-045	§ 1910.119(l)	Subpart D § 68.75
Incident Investigation	§ 296-67-049	§ 1910.119(m)	Subpart D § 68.81
Emergency Planning & Response	§ 296-67-053	§ 1910.119(n)	Subpart E § 68.95
Compliance Audits	§ 296-67-057	§ 1910.119(o)	Subpart D § 68.79
Trade Secrets	§ 296-67-061	§ 1910.119(p)	Subpart G § 68.152

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## 8.0 ATTACHMENT 2 – OSHA 29 CFR 1910.119 REQUIREMENTS

OSHA 1910.119(c) Employee Participation		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(c) Employee participation.</b>  <b>1910.119(c) (1)</b> Employers shall develop a <b>written plan of action</b> regarding the <b>implementation of the employee participation</b> required by this paragraph.</p> <p><b>1910.119(c) (2)</b> Employers shall <b>consult with employees and their representatives</b> on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in this standard.</p> <p><b>1910.119(c) (3)</b> Employers shall <b>provide to employees and their representatives access</b> to process hazard analyses and to all other information required to be developed under this standard.</p>	PS-03 PSM Employee Participation Plan	<ul style="list-style-type: none"> <li>• Electronic via SharePoint</li> </ul>



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OSHA 1910.119(d) Process Safety Information		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(d) Process safety information.</b> In accordance with the schedule set forth in paragraph (e)(1) of this section, the employer shall complete a compilation of written process safety information before conducting any process hazard analysis required by the standard. The compilation of written process safety information is to enable the employer and the employees involved in operating the process to identify and understand the hazards posed by those processes involving highly hazardous chemicals. This process safety information shall include information pertaining to the hazards of the highly hazardous chemicals used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process.</p>	<p>Basic Overview courses for Zone A, B and C.</p>	<p>Active Learner Learning Management System &amp; SharePoint</p>
<p><b>1910.119(d) (1)</b> Information pertaining to the hazards of the <b>highly hazardous chemicals</b> in the process. This information shall consist of at least the following:</p> <p><b>1910.119(d)(1)(i)</b> Toxicity information;  <b>1910.119(d)(1)(ii)</b> Permissible exposure limits;  <b>1910.119(d)(1)(iii)</b> Physical data;  <b>1910.119(d)(1)(iv)</b> Reactivity data;  <b>1910.119(d)(1)(v)</b> Corrosivity data;  <b>1910.119(d)(1)(vi)</b> Thermal and chemical stability data; and  <b>1910.119(d) (1) (vii)</b> Hazardous effects of inadvertent mixing of different materials that could foreseeably occur.</p> <p>Note: Safety Data Sheets meeting the requirements of 29 CFR 1910.1200(g) may be used to comply with this requirement to the extent they contain the information required by this subparagraph.</p>	<p>SDS System managed by SR-32</p> <p>Safety Data Sheets</p> <p>Hazard Warning Sheets</p>	<p>MOP and SDS Electronic via SharePoint or web based applications</p> <p>The SDS Administrator manages the SDS master hard copy</p> <p>This is managed by the site Industrial Hygienist</p>


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OSHA 1910.119(d) Process Safety Information		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(d) (2)</b> Information pertaining to the <b>technology of the process.</b> <b>1910.119(d)(2)(i)</b> Information concerning the technology of the process shall include at least the following:		
<b>1910.119(d)(2)(i)(A)</b> A block flow diagram or simplified process flow diagram (see Appendix B to this section);	Simplified Flow Diagrams (SFDs)	Electronic via SharePoint (E*Doc Program)  Process Control Rooms <sup>1</sup> /Blast Resistant Operator Shelters  Operations Excellence Department - This is maintained by the inspection department;
<b>1910.119(d)(2)(i)(B)</b> Process chemistry;	Operations Training Manuals  Foreman/Supervisor/Manager Manuals	Process Control Rooms <sup>1</sup>  Operations Excellence Department (Foreman Manual only here) and SharePoint
<b>1910.119(d)(2)(i)(C)</b> <span style="color: green;">Maximum intended inventory;</span>	Operating Limits (See MOP-69 for Guidelines) * PSM and RMP performance of Maximum Intended Inventory is accounted for through effective management of: a. Safety upper and lower limits 1910.119(d); Subpart D § 68.65 b. Operating Procedures 1910.119(f); Subpart D § 68.69, and c. Training 1910.119(g); Subpart D § 68.71 all of which are utilized to maintain process inventories within safe and acceptable limits.	Electronic via SharePoint  Process Control Rooms <sup>1</sup> -Master Alarm & Process Variable database

<sup>1</sup> Where it states, "Process Control Room", we are referring to the location where we have an operator whose responsibility covers the console distributed control of the process. There is not an expectation plant wide that a hard copy of each procedure is maintained in our operator shelters at this time.

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OSHA 1910.119(d) Process Safety Information			
Requirement		Compliance	
Regulation		Support Documentation	Location
<b>1910.119(d)(2)(i)(D)</b>	Safe upper and lower limits for such items as temperatures, pressures, flows or compositions; and,	Operating Limits (See MOP-69) Operator training and procedures	Electronic via SharePoint Master Alarm & Process Variable database Process Control Rooms <sup>1</sup>
<b>1910.119(d) (2) (i) (E)</b>	An evaluation of the consequences of deviations, including those affecting the safety and health of employees.	Operating Limits (See MOP-69) Operator training and procedures	Electronic via SharePoint Process Control Rooms <sup>1</sup> -Master Alarm & Process Variable database
<b>1910.119(d) (2) (ii)</b>	Where the original technical information no longer exists, such information may be developed in conjunction with the process hazard analysis in sufficient detail to support the analysis.	PHA Reports  *Not an issue: PSI Information on file prior to initial PHAs.	Master PHA documents (See PSM/PHA Administrator)
<b>1910.119(d) (3)</b>	Information pertaining to the <b>equipment in the process.</b>		
<b>1910.119(d)(3)(i)</b>	Information pertaining to the equipment in the process shall include:		
<b>1910.119(d)(3)(i)(A)</b>	Materials of construction;	Piping and Instrumentation Diagrams (P&IDs) and Simplified Flow Diagrams (SFDs), also referred to at this facility as "3T Drawings"  P&IDs, material specifications, e.g., piping specifications (Carbon Steel, alloys, etc.) and vessel specifications, specification breaks, etc.  SFDs/3Ts, e.g., overlay of materials of construction, e.g., metallurgy	Electronic via SharePoint (E*Doc Program)
<b>1910.119(d)(3)(i)(B)</b>	Piping and instrument diagrams (P&IDs);	P&IDs depictions of the piping and instrumentation, e.g. instrumentation details of DCS configurations	Document Control  Electronic via SharePoint (E*Doc Program)
<b>1910.119(d)(3)(i)(C)</b>	Electrical classification;	Electrical Classification Drawings	Document Control


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OSHA 1910.119(d) Process Safety Information																													
Requirement	Compliance																												
Regulation	Support Documentation	Location																											
<b>1910.119(d)(3)(i)(D)</b> Relief system design and design basis;	<b>Design:</b> PRV Data Sheets, P&IDs  <b>Design Basis:</b> Codes & Standards, Unit Design Compositions  <b>Design Basis:</b> Liquid Knockout (KO) capacity related to relief and blowdown	Inspection Department – PSV and Safeguarding Files P&IDs Electronic via SharePoint (E*Doc Program)  Liquid KO capacity documentation is available with the local PSV SME.  SALUS is the location for relief system design and design basis documentation																											
<b>1910.119(d)(3)(i)(E)</b> Ventilation system design;	Marathon corporate guidance document PSM-1070, Appendix D	Marathon Engineering Standards and Specs Web page																											
<b>1910.119(d)(3)(i)(F)</b> Design codes and standards employed;	Marathon corporate guidance document PSM-1070, Appendix D	Marathon Engineering Standards and Specs Web page  * Managed by Engineering & Reliability																											
<b>1910.119(d)(3)(i)(G)</b> Material and energy balances for processes built after May 26, 1992; and,	<table border="0"> <tr> <td>Engineering Documents</td> <td></td> <td></td> </tr> <tr> <td>Unit</td> <td>Startup</td> <td>On File</td> </tr> <tr> <td>Butamer</td> <td>10/29/95</td> <td>Yes</td> </tr> <tr> <td>ROSE</td> <td>9/24/01</td> <td>Yes</td> </tr> <tr> <td>Jet Fuel Treater</td> <td>12/27/99</td> <td>Yes</td> </tr> <tr> <td>CFH</td> <td>10/15/05</td> <td>Yes</td> </tr> <tr> <td>CCU Amine II</td> <td>Feb 2007</td> <td>Yes</td> </tr> <tr> <td>SHU</td> <td>Feb 2007</td> <td>Yes</td> </tr> <tr> <td>BENSAT</td> <td>Sept 2011</td> <td>Yes</td> </tr> </table>	Engineering Documents			Unit	Startup	On File	Butamer	10/29/95	Yes	ROSE	9/24/01	Yes	Jet Fuel Treater	12/27/99	Yes	CFH	10/15/05	Yes	CCU Amine II	Feb 2007	Yes	SHU	Feb 2007	Yes	BENSAT	Sept 2011	Yes	Master copy available from the Tech Services Supervisor  Electronic via Share Point (E*Doc program)
Engineering Documents																													
Unit	Startup	On File																											
Butamer	10/29/95	Yes																											
ROSE	9/24/01	Yes																											
Jet Fuel Treater	12/27/99	Yes																											
CFH	10/15/05	Yes																											
CCU Amine II	Feb 2007	Yes																											
SHU	Feb 2007	Yes																											
BENSAT	Sept 2011	Yes																											


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OSHA 1910.119(d) Process Safety Information		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(d) (3) (i) (H)</b> Safety systems (e.g. interlocks, detection, or suppression systems).	Area Training Manuals  Area Operating Procedures  PIS Database (Instrumentation, test procedures, cause and effect charts)  MOP-26A Protective Instrumentation, MOP-26B Bypassing or Shutdown of Protective Systems  Safeguarding Memorandums	PIS, MOP 26A, 26B, Training documentation Electronic via SharePoint  Hardcopy of Training Manuals and Procedures are also available in the Process Control Rooms <sup>1</sup>  Inspection Safeguarding File
<b>1910.119(d) (3) (ii)</b> The employer shall document that <b>equipment complies with</b> recognized and generally accepted good engineering practices.	Engineering Codes and Practices  Equipment Records (Electrical, Instrumentation, Analyzers)	(***) See Equipment Disciplines on procedure cover.
<b>1910.119(d)(3)(iii)</b> For existing equipment designed and constructed in accordance with codes, standards, or practices that are no longer in general use, the employer shall determine and document that the equipment is designed, maintained, inspected, tested, and operating in a safe manner.	Anacortes Machinery Repair (Blue Books)  Inspection Records	I&E Shop  Machine Shop Office, extra copies available for craftspeople  Inspection Department
<b>1910.119(e) Process hazard analysis.</b> <b>1910.119(e) (1)</b> The employer shall perform an initial process hazard analysis (hazard evaluation) on processes covered by this standard. The process hazard analysis shall be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process. Employers shall determine and document the priority order for conducting process hazard analyses based on a rationale which includes such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process. The process hazard analysis shall be conducted as soon as possible, but not later than the following schedule: <b>1910.119(e)(1)(i)</b> No less than 25 percent of the initial process hazards analyses shall be completed by May 26, 1994;	PS-04 Process Hazards Analysis (PHAs)  PHA Guidelines (Procedures) and PHA Tracking Spreadsheet	Hardcopies stored in PSM Trlr #3  Electronic via SharePoint

OSHA 1910.119(d) Process Safety Information		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(e)(1)(ii)</b> No less than 50 percent of the initial process hazards analyses shall be completed by May 26, 1995;</p> <p><b>1910.119(e)(1)(iii)</b> No less than 75 percent of the initial process hazards analyses shall be completed by May 26, 1996;</p> <p><b>1910.119(e) (1) (iv)</b> All initial process hazards analyses shall be completed by May 26, 1997.</p> <p><b>1910.119(e)(1)(v)</b> Process hazards analyses completed after May 26, 1987 which meet the requirements of this paragraph are acceptable as initial process hazards analyses. These process hazard analyses shall be updated and revalidated, based on their completion date, in accordance with paragraph (e) (6) of this standard.</p>		
<p><b>1910.119(e) (2)</b> The employer shall use <b>one or more</b> of the following <b>methodologies</b> that are appropriate to determine and evaluate the hazards of the process being analyzed.</p> <p><b>1910.119(e)(2)(i)</b> What-If;</p> <p><b>1910.119(e)(2)(ii)</b> Checklist;</p> <p><b>1910.119(e)(2)(iii)</b> What-If/Checklist;</p> <p><b>1910.119(e)(2)(iv)</b> Hazard and Operability Study (HAZOP);</p> <p><b>1910.119(e)(2)(v)</b> Failure Mode and Effects Analysis (FMEA);</p> <p><b>1910.119(e)(2)(vi)</b> Fault Tree Analysis; or</p> <p><b>1910.119(e) (2) (vii)</b> An appropriate equivalent methodology.</p>	<p>PS-04 Process Hazards Analysis (PHAs)</p> <p>PHA Guidelines (Procedures) and PHA Tracking Spreadsheet</p>	<p>Hardcopies stored in PSM Trlr #3</p> <p>Electronic via SharePoint</p>
<p><b>1910.119(e)(3)</b> The process hazard <b>analysis shall address:</b></p> <p><b>1910.119(e)(3)(i)</b> The hazards of the process;</p> <p><b>1910.119(e)(3)(ii)</b> The identification of any previous incident which had a likely potential for catastrophic consequences in the workplace;</p> <p><b>1910.119(e) (3) (iii)</b> Engineering and administrative controls applicable to the hazards and their interrelationships such as appropriate application of detection methodologies to provide early warning of releases. (Acceptable detection methods might include process monitoring and control instrumentation with alarms,</p>	<p>PS-04 Process Hazards Analysis (PHAs)</p> <p>PHA Guidelines (Procedures) and PHA Tracking Spreadsheet</p>	<p>Hardcopies stored in PSM Trlr #3</p> <p>Electronic via SharePoint</p>

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OSHA 1910.119(d) Process Safety Information		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p>and detection hardware such as hydrocarbon sensors.); Consequences of failure of engineering and administrative controls; Facility siting; Human factors; and A qualitative evaluation of a range of the possible safety and health effects of failure of controls on employees in the workplace.</p> <p><b>1910.119(e)(3)(iv)</b> <b>1910.119(e)(3)(v)</b> <b>1910.119(e)(3)(vi)</b> <b>1910.119(e) (3) (vii)</b></p>		
<p><b>1910.119(e)(4)</b> The process hazard analysis shall be <b>performed by a team</b> with expertise in engineering and process operations, and the team shall include at least one employee who has experience and knowledge specific to the process being evaluated. Also, one member of the team must be knowledgeable in the specific process hazard analysis methodology being used.</p>	<p>PS-04 Process Hazards Analysis (PHAs)  PHA Guidelines (Procedures) and PHA Tracking Spreadsheet</p>	<p>Hardcopies stored in PSM Trlr #3  Electronic via SharePoint</p>
<p><b>1910.119(e)(5)</b> The employer <b>shall establish a system to promptly address</b> the team's <b>findings and recommendations</b>; assure that the recommendations are <b>resolved in a timely manner</b> and that <b>the resolution is documented</b>; document what actions are to be taken; complete actions as soon as possible; develop a <b>written schedule</b> of when these actions are to be completed; <b>communicate the actions</b> to Operating, Maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.</p>	<p>PS-04 Process Hazards Analysis (PHAs)  PHA Guidelines (Procedures) and PHA Tracking Spreadsheet</p>	<p>Hardcopies stored in PSM Trlr #3  Electronic via SharePoint</p>
<p><b>1910.119(e)(6)</b> At least every five (5) years after the completion of the initial process hazard analysis, the process hazard analysis shall be <b>updated and revalidated</b> by a team meeting the requirements in paragraph (e)(4) of this section, to assure that the process hazard analysis is consistent with the current process.</p>	<p>PS-04 Process Hazards Analysis (PHAs)  PHA Guidelines (Procedures) and PHA Tracking Spreadsheet</p>	<p>Hardcopies stored in PSM Trlr #3  Electronic via SharePoint</p>
<p><b>1910.119(e)(7)</b> Employers shall <b>retain</b> process hazards analyses and updates or revalidations for each process covered by this section, as well as the documented resolution of recommendations described in paragraph (e)(5) of this section <b>for the life of the process</b>.</p>	<p>PS-04 Process Hazards Analysis (PHAs)  PHA Guidelines (Procedures) and PHA Tracking Spreadsheet</p>	<p>Hardcopies stored in PSM Trlr #3  Electronic via SharePoint</p>

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OSHA 1910.119(f) Operating Procedures		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(f)</b> <b>Operating procedures.</b> <b>1910.119(f)(1)</b> The employer shall <b>develop and implement written operating procedures</b> that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements.	Operating Procedures for Zones A, B and C	Electronic via SharePoint with hardcopy located in the Process Control Rooms <sup>1</sup> and the Operations Excellence Department.
<b>1910.119(f)(1)(i)</b> Steps for each <b>operating phase</b> :		
<b>1910.119(f)(1)(i)(A)</b> Initial startup;	PS-06 MOC & PSSR * Defined as applicable to new/modified facilities	Electronic via SharePoint * Initial startup procedures are created through a coordinated effort of projects, engineers, operations, and training. After startup, the document is updated and converted into normal, emergency, and T/A startup procedures.
<b>1910.119(f)(1)(i)(B)</b> Normal operations;	Area Training Manuals  Area Operating Procedures	Operations Excellence Specialists Office  Process Control Rooms <sup>1</sup>  Electronic via SharePoint
<b>1910.119(f)(1)(i)(C)</b> Temporary operations;	Area Training Manuals  Area Operating Procedures	Operations Excellence Specialists Office  Process Control Rooms <sup>1</sup>  Electronic via SharePoint
<b>1910.119(f)(1)(i)(D)</b> Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified Operators to ensure that emergency shutdown is executed in a safe and timely manner.	Area Startup/Shutdown Procedures  Area Emergency Procedures	Operations Excellence Specialists Office  Process Control Rooms <sup>1</sup>  Electronic via SharePoint
<b>1910.119(f)(1)(i)(E)</b> Emergency operations;	Area Emergency Procedures	Operations Excellence Specialists Office



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OSHA 1910.119(f) Operating Procedures		
Requirement	Compliance	
Regulation	Support Documentation	Location
		Process Control Rooms <sup>1</sup> Electronic via SharePoint
<b>1910.119(f)(1)(i)(F)</b> Normal shutdown; and,	Area Startup/Shutdown Procedures	Operations Excellence Specialists Office Process Control Rooms <sup>1</sup> Electronic via SharePoint
<b>1910.119(f)(1)(i)(G)</b> Startup following a turnaround, or after an emergency shutdown.	Area Startup/Shutdown Procedures	Operations Excellence Specialists Office Process Control Rooms <sup>1</sup> Electronic via SharePoint
<b>1910.119(f)(1)(ii)</b> <b>Operating limits:</b>		
<b>1910.119(f)(1)(ii)(A)</b> Consequences of deviation; and	Safe Limits & Operating Limits (See MOP-69 for Guidelines) Area Operating Procedures	Process Control Rooms <sup>1</sup>
<b>1910.119(f)(1)(ii)(B)</b> Steps required to correct or avoid deviation.		Electronic via SharePoint
<b>1910.119(f)(1)(iii)</b> <b>Safety and health considerations:</b>		
<b>1910.119(f)(1)(iii)(A)</b> Properties of, and hazards presented by, the chemicals used in the process;	SR-32 HazCom/SDS Process Specific SDS	SR-32 and SDS System Electronic via SharePoint – Intranet
<b>1910.119(f)(1)(iii)(B)</b> Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment;	Area Training Manuals Area Operating Procedures	The SDS Administrator manages the SDS master hard copy
<b>1910.119(f)(1)(iii)(C)</b> Control measures to be taken if physical contact or airborne exposure occurs;		

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OSHA 1910.119(f) Operating Procedures		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(f)(1)(iii)(D)</b> Quality control for raw materials and control of hazardous chemical inventory levels; and,		
<b>1910.119(f) (1) (iii) (E)</b> Any special or unique hazards.	SR-32 HazCom/SDS  Process Specific SDS  Area Training Manuals  Area Operating Procedures Area Training Manuals	MOPs, training materials, and SDS System Electronic via SharePoint  Hardcopy of Training Manuals and Procedures are also available in the Process Control Rooms <sup>1</sup>
<b>1910.119(f) (1) (iv)</b> <b>Safety systems</b> and their functions.	Area Operating Procedures  Area Training Manuals  Area Operating Procedures  PIS Database (Instrumentation, test procedures, cause and effect charts)  MOP-26A Protective Instrumentation, MOP-26B Bypassing or Shutdown of Protective Systems  Safeguarding Memorandums	PIS, MOP, Training documentation Electronic via SharePoint  Hardcopy of Training Manuals and Procedures are also available in the Process Control Rooms <sup>1</sup> and the Operations Excellence Department  Inspection Safeguarding File
<b>1910.119(f) (2)</b> Operating procedures shall be <b>readily accessible</b> to employees who work in or maintain a process.	All procedures listed above.	Electronic via SharePoint  Hardcopy of Training Manuals and Procedures are also available in the Process Control Rooms <sup>1</sup>
<b>1910.119(f)(3)</b> The operating procedures shall <b>be reviewed as often as necessary</b> to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to facilities. The employer shall <b>certify annually</b> that these operating procedures are <b>current and accurate</b> .	PS-06 MOC & PSSR  MOP-04 Operating Procedures	Electronic via SharePoint  Operating procedures certifications are kept on file in the office of each Operations Excellence Specialists.

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OSHA 1910.119(f) Operating Procedures		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(f)(4)</b> The employer shall <b>develop and implement safe work practices</b> to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a facility by Maintenance, contractor, Laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees.</p>	<p>Safety Permitting: SR-05 Work Permitting &amp; JHA Program  Lockout/Tagout: SR-60 Control of Hazardous Energy (Lockout/Tagout)  Confined Space: SR-29 Confined Space Entry</p> <p>Opening Equip: SR-63 Separation and/or Connection of Piping in the Refinery, MOP-28 Blinding and Isolation, SR-14 Flare, Hot Drop Out, &amp; Systems Containing H2S  Entry Control: SR-28 Notification Of Entry Into Operating Units, SR-05 Work Permitting &amp; JHA Program</p> <p>Employee Application:  New Hire Training Program, Operations Training Program, Maintenance Training Program</p> <p>Contractor Application:  SR-11 Contractor Safety Program</p>	<ul style="list-style-type: none"> <li>MOP/SRs Electronic via SharePoint</li> </ul> <p>Operations Excellence Supervisor (New Hire) Operations Excellence Department. Maintenance Department</p> <p>PSM Contractor Orientation Facility</p>

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OSHA 1910.119(g) Training		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(g) Training.</b>  <b>1910.119(g) (1) Initial training.</b>  <b>1910.119(g)(1)(i)</b></p> <p>Each employee presently involved in operating a process, and each employee 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 this section. The training shall include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.</p>	<p>PS-09 PSM Training</p> <p>SR-50 EHS Training Program</p> <p>Operations Training Program</p>	<p>Electronic via SharePoint</p> <ul style="list-style-type: none"> <li>• Records on file in the Operations Excellence Department, (Hard copies in Badge reader limited access protected file room and electronic files maintained in the Learning Management System</li> <li>* New Hire Training Program)</li> </ul>
<p><b>1910.119(g) (1) (ii)</b></p> <p>In lieu of initial training for those employees already involved in operating a process on May 26, 1992, an employer may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures.</p>	<p>LMS Training Database Archive</p> <p>LMS Training Database</p>	<p>Operations Excellence Supervisor or Specialists</p> <p>Operations Excellence Supervisor or Specialists and site database administrator</p>
<p><b>1910.119(g) (2) Refresher training.</b> Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The employer, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training.</p>	<p>PS-09 PSM Training</p> <p>Anacortes Refinery Training Guidelines</p>	<p>Electronic via Learning Management System</p> <p>-Hardcopies retained in Operations Excellence Department Records Room</p>
<p><b>1910.119(g) (3) Training documentation.</b> The employer shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The employer shall prepare a record which contains the <b>identity</b> of the employee, the <b>date</b> of training, and the <b>means</b> used to verify that the employee understood the training.</p>	<p>Document Management: Anacortes Refinery Training Guidelines (Ex: SR-50, Training Standards Manual, Training to perform JKS review, etc.)</p> <p>Operations Records</p> <p>Maintenance/Refinery Records</p> <p>Electronic Records</p>	<ul style="list-style-type: none"> <li>• Electronic via LMS / SharePoint</li> </ul> <p>Hardcopy on file in the Operations Excellence Department records room</p> <p>LMS database managed by Operations Excellence Department</p>

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OSHA 1910.119(h) Contractors		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(h) Contractors.</b> <b>1910.119(h) (1)</b> Application. This paragraph applies to contractors performing maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. It does not apply to contractors providing incidental services which do not influence process safety, such as janitorial work, food and drink services, laundry, delivery or other supply services.		
<b>1910.119(h) (2) Employer responsibilities.</b>		
<b>1910.119(h) (2) (i)</b> The employer, when selecting a contractor, shall obtain and evaluate information regarding the contract employer's safety performance and programs.	Contractor protocols  PSM Orientation	SR-11 Electronic via SharePoint  PSM Contractor Orientation Facility
<b>1910.119(h) (2) (ii)</b> The employer shall inform contract employers of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process.	Contractor Conference: SR-11 Contractor Safety Program  Safety Guidelines and Requirements for Contractors	
<b>1910.119(h)(2)(iii)</b> The employer shall explain to contract employers the applicable provisions of the emergency action plan required by paragraph (n) of this section.		
<b>1910.119(h)(2)(iv)</b> The employer shall develop and implement safe work practices consistent with paragraph (f)(4) of this section, to control the entrance, presence and exit of contract employers and contract employees in covered process areas.	Entry Control: SR-28 Notification Of Entry Into Operating Units, SR-05 Work Permitting & JHA Program * In addition to the documentation above	• Electronic via SharePoint
<b>1910.119(h) (2) (v)</b> The employer shall periodically evaluate the performance of contract employers in fulfilling their obligations as specified in paragraph (h) (3) of this section.	Contractor Conference renewed annually per SR-11 Contractor Safety Program	SR-11 Electronic via SharePoint
<b>1910.119(h) (2) (vi)</b> The employer shall maintain a contract employee injury and illness log related to the contractor's work in process areas.	Contractor Conference: SR-11 Contractor Safety Program  Safety Department records	SR-11 Electronic via SharePoint  Safety Department

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OSHA 1910.119(h) Contractors		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p>** Implied requirement from contract employer list: Maintain a list submitted from contract employers of unique hazards presented by contractor's work or hazards found in the workplace that have been reported to the employer.</p>	<p>Contractor Conference: SR-11 Contractor Safety Program, Job Scope Write-up, Unique Hazards Form</p>	<p>SR-11 Electronic via SharePoint  PSM Contractor Orientation Facility</p>
<p><b>1910.119(h) (3) Contract employer responsibilities.</b></p>		
<p><b>1910.119(h) (3) (i)</b> The contract employer <b>shall assure</b> that each contract employee is trained in the work practices necessary to safely perform his/her job.</p>	<p>Contractor Conference: SR-11 Contractor Safety Program, Job Scope Write-up, Unique Hazards Form</p> <p style="text-align: center;">See Contractor Location(s)</p>	<p>SR-11 Electronic via SharePoint  PSM Contractor Orientation Facility</p> <p>The location of the information/records for these items listed is independent to each contractor. Specific or central locations are not required but information/records shall be presented upon request. This information is kept in each contractor's file in the Contractor Training Center.</p>
<p><b>1910.119(h)(3)(ii)</b> The contract employer <b>shall assure</b> that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.</p>		
<p><b>1910.119(h) (3) (iii)</b> The contract employer <b>shall document</b> that each contract employee has received and understood the training required by this paragraph. The contract employer shall prepare a record which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training.</p>		
<p><b>1910.119(h)(3)(iv)</b> The contract employer <b>shall assure</b> that each contract employee follows the safety rules of the facility including the safe work practices required by paragraph (f)(4) of this section.</p>		
<p><b>1910.119(h) (3) (v)</b> The contract employer <b>shall advise</b> the employer of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.</p>		

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OSHA 1910.119(i) Pre-Startup Review		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(i) Pre-startup safety review.</b> <b>1910.119(i) (1)</b> The employer shall perform a pre-startup safety review for new facilities and for modified facilities when the modification is significant enough to require a change in the process safety information.	PS-06 MOC & PSSR	Electronic via SharePoint and InteleX
<b>1910.119(i)(2)</b> The pre-startup safety review shall confirm that prior to the introduction of highly hazardous chemicals to a process:		
<b>1910.119(i)(2)(i)</b> <b>Construction</b> and equipment is in accordance with design specifications;		
<b>1910.119(i)(2)(ii)</b> Safety, operating, maintenance, and emergency <b>procedures are in place</b> and are adequate;		
<b>1910.119(i) (2) (iii)</b> For new facilities, a <b>process hazard analysis</b> has been performed and recommendations have been resolved or implemented before startup; and modified facilities meet the requirements contained in <b>management of change</b> , paragraph (l).		
<b>1910.119(i) (2) (iv)</b> <b>Training</b> of each employee involved in operating a process has been completed.		


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OSHA 1910.119(j) Mechanical Integrity		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(j) Mechanical integrity.</b> <b>1910.119(j) (1)</b> Application. Paragraphs (j)(2) through (j)(6) of this section apply to the following process equipment:		
<b>1910.119(j)(1)(i)</b> Pressure vessels and storage tanks;	Inspection Procedure Books  Quality Assurance Manual for Pressure Vessel Repairs  Inspection Department Records System	Inspection Department  Electronic via SharePoint
<b>1910.119(j)(1)(ii)</b> Piping systems (including piping components such as valves);	Inspection Procedure I-10.06  Inspection Department Records System  MOP-46 Process Valves - Maintenance And Inspection	Inspection Department  Electronic via SharePoint
<b>1910.119(j)(1)(iii)</b> Relief and vent systems and devices;	Quality Control Manual for Repair of PRV's  MOP-12 Pressure Relief Systems	Inspection Department  Electronic via SharePoint
<b>1910.119(j)(1)(iv)</b> Emergency shutdown systems;	MOP-26A Protective Instrumentation, MOP-26B Bypassing or Shutdown of Protective Systems	Electronic via SharePoint
<b>1910.119(j)(1)(v)</b> Controls (including monitoring devices and sensors, alarms, and interlocks) and,		
<b>1910.119(j) (1) (vi)</b> Pumps (* and Compressors). * Not worded in the regulation. Added due to logical inclusion	Anacortes Machinery Repair Books (Blue Books)	Machine Shop Office, extra copies available for craftspeople
<b>1910.119(j) (2) Written procedures.</b> The employer shall establish and implement written procedures to maintain the on-going integrity of process equipment.	Anacortes Machinery Repair Books (Blue Books)  Maintenance Procedures  MOP-48 Overspeed Trip System Testing  MOP-56 Maintenance Of Structural & Piping Supports	Machine Shop Office, extra copies available for craftspeople  Maintenance Procedures are Electronic via SharePoint (Maint./Maint. Proc. Index)  Electronic via Learning Management System




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OSHA 1910.119(j) Mechanical Integrity		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(j) (3) Training</b> for process maintenance activities. The employer shall train each employee involved in maintaining the on-going integrity of process equipment 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.	Anacortes LMS Guidelines Manual  LMS Training Database Archive	Electronic via SharePoint  Operations Excellence Supervisor or Specialists and site database administrator
<b>1910.119(j) (4) Inspection and testing.</b> <b>1910.119(j) (4) (i)</b> Inspections and tests shall be performed on process equipment.	Specific to each equipment discipline	(***) See Equipment Disciplines on procedure cover.
<b>1910.119(j) (4) (ii)</b> Inspection and testing procedures shall follow recognized and generally accepted good engineering practices.		
<b>1910.119(j)(4)(iii)</b> The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturer's recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.	Inspection Procedure I-10.08	Inspection Department  Electronic via SharePoint
<b>1910.119(j) (4) (iv)</b> The employer shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.	Inspection Department Record System	Inspection Department
<b>1910.119(j) (5) Equipment deficiencies.</b> The employer shall correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in paragraph (d) of this section) before further use or in a safe and timely manner when necessary means are taken to assure safe operation.	Specific to each equipment discipline  PS-06 MOC & PSSR  MOP-74 Major Equipment Deficiencies	(***) See Equipment Disciplines on procedure cover.  Electronic via SharePoint

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OSHA 1910.119(j) Mechanical Integrity		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(j) (6) Quality assurance.</b>  <b>1910.119(j)(6)(i)</b> In the construction of new plants and equipment, the employer shall assure that equipment as it is fabricated is suitable for the process application for which they will be used.</p> <p><b>1910.119(j) (6) (ii)</b> Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.</p> <p><b>1910.119(j) (6) (iii)</b> The employer shall assure that maintenance materials, spare parts and equipment are suitable for the process application for which they will be used.</p>	Site procedure R-50-014 Quality Assurance (QA) / Quality Control (QC)	PPM Electronic via SharePoint

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OSHA 1910.119(k) Hot Work Permits		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(k) Hot work permit.</b>  <b>1910.119(k) (1)</b> The employer shall issue a hot work permit for hot work operations conducted on or near a covered process.  <b>1910.119(k) (2)</b> The permit shall document that the fire prevention and protection requirements in 29 CFR 1910.252(a) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed. The permit shall be kept on file until completion of the hot work operations.</p>	<p>SR-57 Guidelines For Personnel Involved In Hot Work Operations</p> <p>SR-05 Work Permitting &amp; JHA Program</p> <p>SR-29 Confined Space Entry</p> <p>SR-45 Procedures For Hot Tapping or Welding on Equipment in Service</p>	<p>Electronic via SharePoint</p>

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OSHA 1910.119(I) Management of Change		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(I) Management of change.</b>  <b>1910.119(I) (1)</b> The employer shall establish and implement written procedures to manage changes (<b>except for "replacements in kind"</b>) to process chemicals, technology, equipment, and procedures; and, changes to facilities that affect a covered process.</p> <p><b>1910.119(I)(2)</b> The procedures shall assure that the following considerations are addressed <b>prior to any change:</b></p> <p><b>1910.119(I)(2)(i)</b> The technical basis for the proposed change;  <b>1910.119(I)(2)(ii)</b> Impact of change on safety and health;  <b>1910.119(I)(2)(iii)</b> Modifications to operating procedures;  <b>1910.119(I)(2)(iv)</b> Necessary time period for the change; and,  <b>1910.119(I) (2) (v)</b> Authorization requirements for the proposed change.</p> <p><b>1910.119(I)(3)</b> Employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process shall <b>be informed of, and trained in</b>, the change prior to start-up of the process or affected part of the process.</p> <p><b>1910.119(I)(4)</b> If a change covered by this paragraph results in a <b>change in the process safety information</b> required by paragraph (d) of this section, such information shall be updated accordingly.</p> <p><b>1910.119(I) (5)</b> If a change covered by this paragraph results in a <b>change in the operating procedures</b> or practices required by paragraph (f) of this section, such procedures or practices shall be updated accordingly.</p>	PS-06 MOC & PSSR	Electronic via SharePoint

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OSHA 1910.119(m) Incident Investigation		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(m) Incident investigation.</b>  <b>1910.119(m) (1)</b> The employer shall investigate each incident which <b>resulted in or could reasonably have resulted in a catastrophic release of highly hazardous chemical in the workplace.</b>  <b>1910.119(m) (2)</b> An incident investigation shall be <b>initiated</b> as <b>promptly</b> as possible, as but not later than 48 hours following the incident.  <b>1910.119(m)(3)</b> An incident <b>investigation team</b> shall be established and consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident.  <b>1910.119(m)(4)</b> A <b>report</b> shall be prepared at the conclusion of the investigation which includes at a minimum:  <b>1910.119(m)(4)(i)</b> Date of incident;  <b>1910.119(m)(4)(ii)</b> Date investigation began;  <b>1910.119(m)(4)(iii)</b> A description of the incident;  <b>1910.119(m)(4)(iv)</b> The factors that contributed to the incident; and,  <b>1910.119(m) (4) (v)</b> Any recommendations resulting from the investigation.  <b>1910.119(m) (5)</b> The employer shall establish a <b>system to promptly address and resolve the incident report findings and recommendations.</b> Resolutions and corrective actions shall be documented.  <b>1910.119(m) (6)</b> The report shall be <b>reviewed with all affected personnel</b> whose job tasks are relevant to the incident findings including contract employees where applicable.  <b>1910.119(m) (7)</b> Incident investigation reports shall <b>be retained for five years.</b></p>	<p>PS-07 Incident/Near Miss Reporting and Incident Investigation  Incident Investigation Files</p>	<p>Electronic via SharePoint  TOP Coordinator Office</p>


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OSHA 1910.119(n) Emergency Planning and Response		
Requirement	Compliance	
Regulation	Support Documentation	Location
<b>1910.119(n) Emergency planning and response.</b> The employer shall establish and implement an emergency action plan for the entire plant in accordance with the provisions of 29 CFR 1910.38.	Emergency Response Manual (ERM)	Electronic via SharePoint
	Emergency Response Training (initial upon assignment): The ERM is an integrated component of the overall training program  Operations - (Training Manual, Job, Knowledge, Skills qualification Review)  Contractors – Component of the PSM Contractor Orientation Program.  SR-11 Contractor Safety Program  Maintenance – Training Program and documentation	Learning Management System Database  Operations Excellence Department Records Room  PSM Contractor Orientation Facility  Electronic via SharePoint  Operations Excellence Department Records Room

OSHA 1910.119(n) Emergency Planning and Response		
Requirement	Compliance	
Regulation	Support Documentation	Location
In addition, the emergency action plan shall include procedures for handling small releases.	SR-26 Use of Chlorinated or Fluorinated Solvents  SR-44 Products and Materials Containing Benzene  EP-04 Spill Prevention Control & Counter Measure Plan  ERM Emergency Response Manual  Marine: Marine Oil Spill Contingency Manual  Oil Discharge Prevention and Contingency Plan  Facility Response Plan	• SR/EP/ERM electronic via SharePoint           Contingency Planning Office
Employers covered under this standard may also be subject to the hazardous waste and emergency response provisions contained in 29 CFR 1910.120 (a), (p) and (q).		

ERM Emergency Response Manual WAC 296-62 Parts (P) And WAC 296-824 HAZWOPER

<p>* Note: This is not a RCRA Treatment, Storage, Disposal Facility Electronic via SharePoint</p>
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OSHA 1910.119(o) Compliance Audit		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(o) Compliance Audits.</b></p> <p><b>1910.119(o) (1)</b> Employers shall <b>certify</b> that they have evaluated compliance with the provisions of this section <b>at least every three years</b> to verify that the procedures and practices developed under the standard are adequate and are being followed.</p> <p><b>1910.119(o) (2)</b> The compliance audit shall be <b>conducted by at least one person</b> knowledgeable in the process.</p> <p><b>1910.119(o) (3)</b> A <b>report</b> of the findings of the audit shall be developed.</p> <p><b>1910.119(o) (4)</b> The employer shall <b>promptly determine and document</b> an appropriate <b>response</b> to each of the findings of the compliance audit and document those deficiencies have been corrected.</p> <p><b>1910.119(o) (5)</b> Employers shall <b>retain the two (2) most recent compliance audit reports.</b></p>	<p>PS-08 PSM Compliance Audit</p> <p>PSM Compliance Audits, Certification Letters, and Action Item tracking closure</p>	<p>Electronic via SharePoint</p> <p>On File With PSM Coordinator</p>



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OSHA 1910.119(p) Trade Secrets		
Requirement	Compliance	
Regulation	Support Documentation	Location
<p><b>1910.119(p)(1)</b> Employers shall make all information necessary to comply with the section <b>available</b> to those persons responsible for compiling the process safety information (required by paragraph (d) of this section), those assisting in the development of the process hazard analysis (required by paragraph (e) of this section), those responsible for developing the operating procedures (required by paragraph (f) of this section), and those involved in incident investigations (required by paragraph (m) of this section), emergency planning and response (paragraph (n) of this section) and compliance audits (paragraph (o) of this section) without regard to possible trade secret status of such information.</p> <p><b>1910.119(p)(2)</b> Nothing in this paragraph shall preclude the employer from requiring the persons to whom the information is made available under paragraph (p)(1) of this section to enter into confidentiality agreements not to disclose the information as set forth in 29 CFR 1910.1200.</p> <p><b>1910.119(p)(3)</b> Subject to the rules and procedures set forth in 29 CFR 1910.1200(i)(1) through 1910.1200(i)(12), employees and their designated representatives shall have access to trade secret information contained within the process hazard analysis and other documents required to be developed by this standard. [57 FR 23060, June 1, 1992; 61 FR 9227, March 7, 1996]</p>	MOP22 Information Security	Electronic via SharePoint/ SharePoint Site