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RESPONSIBLE DEPT.	CONTENT CUSTODIAN	APPROVED BY	LEGACY NUMBER:	
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## 1.0 INTRODUCTION

This procedure is designed to outline the approach that Anacortes Refinery has taken to comply with employee participation requirements of Process Safety Management (PSM) as outlined in OSHA 29 CFR 1910.119(c), WAC 296-67-009, and EPA RMP 40 CFR Subpart D-Part 68.83.

### 1.1 Purpose

This plan establishes specific steps that are taken, and methods used to ensure an ongoing flow of information to and from employees as related to the location's PSM program.

### 1.2 Scope

This element provides employees with the opportunity to participate in PSM policies and procedures, leading to a greater commitment for PSM implementation.

This procedure sets the minimum requirements for ensuring that the site's Employee Participation Program satisfies PSM requirements by (a) consulting employees in the development of the written PSM Site Plan, (b) outlining employee participation in every element of PSM (e.g. process hazard analyses), (c) providing employees with access to all information associated with PSM programs (e.g. process hazard analyses), and (d) providing for an employee participation plan.

## 2.0 REFERENCES

### 2.1 Marathon Standards, Policies & Procedures

- RSP-1301 PSM/RMP Employee Participation

### 2.2 Government Regulations

- WAC 296-67 Process Safety Management of Highly Hazardous Chemicals
- OSHA 29 CFR 1910.119 Process Safety Management of Highly Hazardous Chemicals
- EPA RMP 40 CFR Part 68 Chemical Accident Prevention Provisions

## 3.0 REQUIREMENTS

### 3.1 Consultation

- The Process safety Council (PSC), consisting of appropriate Site Management, Site Supervision, and Employee Participation Representatives will be consulted during the development and revision of the site's Employee Participation element and plan
- After the Employee Participation plan element is developed, appropriate Site Management, Site Supervision, and Employee Participation Representatives will be consulted during the development and revisions of all other elements of each PSM Site Plan.
- Other Consultation requirements include the following: (a) Conduct a review of the Employee Participation and all other PSM elements on a five-year basis or more

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often, as needed, and (b) Document all PSM Site Plan element reviews and consultations.

- Refining is committed to revising the programs for involvement of employees and/or contractors in these programs based on consideration of employee suggestions and program performance.
- Attachment 3 contains a form which can be used to document the participation in, and results of, the team review.

### **3.2 Site Plan versus Marathon or Refining Standard**

- Each PSM Covered Facility must review all elements of their PSM Site Plan utilizing the review team referred to above. The PSM Site Plan will have to: (a) meet the MPC PSM Standard, (b) PSM 1070, and (c) address site specific issues and concerns.
- These review teams may recommend adopting the Refining Standard as a site plan without any change, but the site review is required to ensure proper employee consultation.

## **4.0 ROLES AND RESPONSIBILITIES**

The Anacortes Refinery will achieve its employee participation plan by consulting with employees and sharing of information in a number of ways and forums as outlined below.

Anacortes utilizes its normal organizational structure and existing teams to implement PSM. Represented employee involvement and active participation in PSM is encouraged and the following structure is designed to support this.

### **4.1 Site Plan Management and Site Supervision**

- Participate in PSM development and implementation as outlined in the PSM Site Plan.
- Ensure that employees are afforded the opportunity to consult on program elements and use participation opportunities as:
  - outlined in this program,
  - more fully described in each of the other PSM programs.
- Provide comments to management about Refining’s development and implementation of PSM programs.
- Ensure access to PSM information needed by Marathon employees and contractors and resolve any access difficulties.
- Ensure process safety communication with employees in the following areas:
  - changes to the PSM Standards and Site Plans
  - results of applicable Process Hazards Analysis
  - investigations of applicable process safety incidents
  - process safety training requirements such as refresher training and training associated with MOC, and results of applicable audits
- Ensure process safety communications by:
  - attending safety meetings

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- receiving suggestions on process safety issues and concerns
- providing feedback to management on process safety performance, issues, and employee concerns
- Participate in special committees, incident investigations teams, and PSM element review.
- Support employee involvement
- Request, receive and resolve comments from employees and contractors about Refining's Development and implementation of PSM programs and respond appropriately

#### **4.2 Human Resource Manager**

The Site Human Resource Manager, or designee, will oversee participation plan development and implementation. They will serve as the element document custodian and update and distribute as necessary. They will ensure that program requirements are being fulfilled and revise as necessary.

#### **4.3 Plant Health and Safety Committee**

The Plant Health and Safety Committee (PH&SC) is comprised of refinery employees as outlined in the Collective Bargaining Agreement (CBA) between Refining and Marketing Company and United Steelworkers Union. The PH&SC meetings also include a contract company representative (typically this is the Contractor Safety Council Chairperson).

The HES&S Manager acts as the permanent secretary to prepare and publish minutes of each meeting. The Committee meets the third Wednesday of each month to discuss safety issues. These meetings include but are not limited to the following:

- Dissemination of new information
- Review of occupational and process safety performance trends and statistics
- Review of safety performance and programs of primary contractors,
- Review of all accidents and incidents
- Recommend resolution of safety concerns
- Participate in, review, discuss, and recommend resolution of any problem which may be noted during health and safety inspections, or that may have originated from one of the Departmental Health & Safety Committees
- Understand emerging safety issues and new legislation and recommend application to the refinery
- Timeliness of approval of Incident Investigation reports per the Incident/Near Miss Reporting & Incident Investigation Procedure

It is expected that Committee members will represent the employees on issues arising from their work areas.

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#### 4.4 Departmental Health and Safety Committees

Departmental Health and Safety Committees are comprised of refinery employees as outlined in the Collective Bargaining Agreement between Refining and Marketing Company and United Steelworkers Union.

These Departmental Committees meet monthly and shall solicit input from their respective departments to develop suggestions to improve safe and healthful working conditions in their departments. Such recommendations for improvement are brought to the attention of the department Area Team Leader or manager for consideration. The Area Team Leader/manager will take steps to correct the items brought to their attention. A protocol for managing action items generated from departmental and craft safety meetings can be found in Attachment 1. Any item, which cannot be resolved at this level, shall be referred to the Plant HES&S Committee.

In addition to the Departmental Health and Safety Committees in operations and maintenance, other work groups, such as the Quality Assurance Lab, may have an HES&S Committee. The committee in Quality Assurance is composed of three members from the department appointed by the manager. Each member serves for six months. Minutes from these meetings are prepared and distributed.

#### 4.5 Safety Huddles and Employee Participation

Departmental Work Group Safety Huddles are held monthly. All participants share in the responsibility for the quality of these safety huddles. The purpose of these huddles is to share information, provide a forum to set safety goals, promote accident prevention, to train, and to surface and resolve safety issues. Special purpose safety huddles are also scheduled to communicate a major issue or to emphasize safety concerns prior to an event such as the start of a turnaround.

#### 4.6 Contractor Safety Council Board Meetings, Safety Huddles & Contract Employee Participation

Contractor Safety Council meets quarterly or more frequently, as needed. Work Group Safety Huddles are held monthly. All participants share in the responsibility for the quality of these safety huddles. The purpose of these huddles is to share information, provide a forum to set safety goals, promote accident prevention, to train, and to surface and resolve safety issues. Special purpose safety huddles are also scheduled to communicate a major issue or to emphasize safety concerns prior to an event such as the start of a turnaround. There is also a stand-alone agenda item to discuss PSM related incidents and information in the Contractor Safety Council Meeting, which is captured in the meeting minutes. The expectation is that this would provide a specific opportunity to deliver PSM information and provide a forum to discuss process safety issues at this meeting that would then be disseminated at the Contractor Work Group Safety Meetings.

The Contractor Safety Council Board includes the Maintenance Manager or designee, the Engineering Manager or designee, and the HSE Manager or designee. The Safety Superintendent also participates in the meeting, as well as the Safety staff.

#### 4.7 Process Safety Council

The Process Safety Council (PSC) is comprised of refinery employees as outlined in the PSC Charter and is sponsored by the Refinery Manager. The PSC is a partnership of process safety leaders from represented and staff personnel who monitor and work to

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improve the state of Anacortes' overall process safety program. The PSC meets monthly or more frequently as needed.

#### **4.8 USW Process Safety Representative**

The Process Safety Representative role is outlined by a Letter of Agreement (LOA) for the position. There is a primary position as well as an alternate position to ensure the position is fully staffed for vacation/illness.

The intent of this position is to have additional employee input into PSM programs as well as to communicate process safety concerns from the employee population back to local management. The role provides additional opportunities to support employee participation within the site's process safety programs.

The position reports to the Process Safety Supervisor and is required to fulfill the written requirements outlined in the LOA as well as directives from the Process Safety Supervisor.

#### **4.9 USW Health and Safety Representative**

The Health and Safety Representative role is outlined by a Letter of Agreement (LOA) for the position. There is a primary position as well as an alternate position to ensure the position is fully staffed for vacation/illness.

The intent of this position is to promote a safe work environment by supporting the health and safety department as well as support investigation and incident reporting. The Health and Safety Representative also communicates safety concerns from the employee population back to local management.

The position reports to the Safety Supervisor and is required to fulfill the written requirements outlined in the LOA as well as directives from the Safety Supervisor.

#### **4.10 All Employees**

Below is a summary of employee participation as outlined by each applicable section of WAC 296-67, 29CFR1910.119 and 40CFR68 (RMP).

##### **4.10.1 Application**

Process Engineering personnel have reviewed the basis for including existing process units and atmospheric storage tanks under PSM and/or RMP coverage. All new tanks and facilities are also reviewed by Process Engineering to determine if they are part of the covered process. The basis for covered facilities is reviewed with employees of the unit as part of the PHA review. Refer to the Process Hazard Analysis (PHA) Procedure R-12-004 for detailed information on the applicability protocols for the refinery. (WAC § 296-67-001, § 29CFR1910.119 (a) and 40CFR Subpart A § 68.10 Application).

##### **4.10.2 Process Safety Information (PSI)**

Process Safety Information (PSI) regarding the chemistry, technology, and equipment of the process is developed, documented, and retained by the Process Engineering, Engineering, and Maintenance Resource Department personnel. Refer to the PSM Overview document R-12-001 for detailed information on Process Safety Information (PSI). (WAC § 296-67-013, § 29CFR1910.119 (d) and Subpart D § 68.65 Process Safety Information).

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#### 4.10.3 Process Hazard Analysis (PHA)

The Process Engineering Department has established which process units and atmospheric storage tanks are included in PHAs. A five-year review plan has been established. Operating and engineering personnel knowledgeable about unit processes are included in each PHA review team. Employees with specific operating or maintenance knowledge are utilized to provide specific information. The results of the PHA are reviewed by operating personnel and resolution of issues is fed back to them and the review team. PHAs are also conducted for new projects and the results become part of the project documentation. Refer to the Process Hazard Analysis (PHA) Procedure R-12-004 for detailed information on the PHA protocols for the refinery. (WAC § 296-67-017, § 29CFR1910.119 (e) and 40CFR Subpart D § 68.67 Process Hazard Analysis (PHA)).

#### 4.10.4 Mechanical Integrity (MI)

Mechanical integrity (MI) is driven by the WAC § 296-67-037 § 29CFR1910.119 (j) standard, but it is significant in terms of the asset coverage involved. For example, MI includes any and all equipment/assets used to produce products made from specific quantities of defined hazardous materials on the list covered by the PSM standard. System examples include fixed equipment such as pressure vessels and storage tanks, piping systems and associated hardware (valves, fittings, etc.).

MI encompasses the activities necessary to ensure that equipment/assets are designed, fabricated, installed, operated, inspected and maintained in such a way that they provide the desired performance in a safe, environmentally protected and reliable fashion. In short, it is the Life Cycle Asset Management (LCAM) process, including the above plus procurement, testing, commissioning and disposal of the assets. MI is a sub-set of an effective reliability program and overall asset management, specific to equipment types, and more tactical in nature including the evaluation of condition requirements through regular monitoring and inspection of the condition of these assets. relief devices, vent hardware and emergency shutdown/control systems. Rotating equipment/assets, such as pumps, blowers, fans, and compressors that may be used to move hazardous materials within these systems are also included. This means that all equipment within the boundaries of a facility that is covered process is subject to the PSM standard.

#### 4.10.5 Operating Procedures

Operating employees participate in the creation, review and update to operating procedures. Operating employees may initiate an update to a procedure whenever it is appropriate. Operating employees also may initiate the Management of Change process when there is a significant change to operating procedures. Refer to the Operating Procedures Policy D-30-001 for detailed information on the proper protocols for review, update, deviation, and so forth for all types of operating procedures. (WAC § 296-67-021, § 29CFR1910.119 (f), 40CFR Subpart D § 68.69 Operating Procedures).

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#### 4.10.6 Training of Operating Employees

The training of operating personnel is conducted by the Operations Excellence Specialist and by other operating personnel who are familiar with the unit and its potential hazards. Training courses include feedback and evaluation from attendees on the strengths and weaknesses of the course material and presentation. This feedback system satisfies the PSM requirement to periodically evaluate our training programs to ensure the necessary skills, knowledge and routines are being properly understood and implemented by our trained employees. Changes to operating guidance are updated based on this feedback as appropriate. Training courses and their frequency are determined by operations staff personnel, in consultation with the employees involved in operating the processes and with consideration for legal requirements when applicable. This consultation is accomplished during 3-year refresher training for each operating job that an employee is trained on. Once the 3-year review training is completed the employee is encouraged to evaluate the frequency of the refresher training program and comment on the subject. When feedback is given by employees, management evaluates the feedback and makes the appropriate adjustments to the programs. Refer to the PSM Overview document R-12-001 for detailed information on Operator training, as well as the Anacortes Operations Training Guidelines. (WAC § 296-67-025, § 29CFR1910.119(g) and 40CFR Subpart D § 68.71 Training of Operating Employees).

#### 4.10.7 Contractors

Contractors providing support within the refinery are provided general information on plant operations, potential hazards, evacuation procedures, basic safety information, and information on how they can have active participation within the site safety program. This information is conveyed during the Safety Orientation and in the Anacortes Refinery Safety Guidelines and Requirements for contractors. The contractors are expected to document that this information has been reviewed with each of their employees working in the plant. All employees and contractors are issued a copy of the PSM Handbook during orientation. This handbook contains information regarding process descriptions and potential process hazards for areas where they may work. They are also encouraged to provide comments and suggest revisions to the handbook. Contract employees are provided specific information on potential fire, explosion, and toxic release hazards for the area in which they are working each time they are issued a work permit. They are given an opportunity to ask questions regarding hazardous materials, preparation of equipment and precautions to be taken as well as post joint job site discussions, after a task has been completed, as an avenue to share learnings. Additional information is readily available upon request in the form of the Safety Data Sheet Database and the refinery Process Overview documents which are made available on the information sharing systems on the computers in the refinery. Contract Employees also are involved in employee participation through the monthly contractor safety council meetings. Results of contractor audits are discussed with the contract employer, and follow-up actions determined. Refer to the Contractor Safety Program Document R-11-009. (WAC § 296-67-029, § 29CFR1910.119(h) and 40CFR Subpart D § 68.87 Contractors).



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4.10.8 Pre-Start-Up Safety Review (PSSR)

PSSRs are conducted by a team of employees including personnel from operations, technical, health & safety, and maintenance. The PSSR includes interviews of employees regarding organizational and equipment readiness, training and procedures. Recommendations of the review team are documented and when appropriate, discussed with operations management. Deficient items are mitigated before introducing highly hazardous chemicals to the covered process. Refer to the Management of Change and Pre-Startup Safety Review procedure R-12-006 for detailed information. (WAC § 296-67-033, § 29CFR1910.119(I) and 40CFR Subpart D § 68.77 Pre-Start-Up Safety Review).

4.10.9 Training of Maintenance Employees

Employees participate in all phases of procedure revisions. Maintenance employees have an opportunity to provide feedback in the training on potential hazards. The implementation of procedures such as MOC, PSSR and development of project P&IDs include a high degree of employee participation. The training of maintenance personnel is coordinated by the Corporate Maintenance Trainer and delivered in a number of ways, including by vendors and by other maintenance personnel who are familiar with the subject matter as well as online or electronically. Training courses include feedback and evaluation from attendees on the strengths and weaknesses of the course, instruction, and presentation. This feedback system satisfies the PSM requirement to periodically evaluate our training programs to ensure the necessary skills, knowledge and maintenance procedures, protocols, etc. are being properly understood and implemented by our trained employees. Training courses and their frequency are determined by a customized instructional system design method that includes consulting Maintenance staff personnel and the employees involved in maintaining the ongoing mechanical integrity of the covered processes and with consideration for legal requirements when applicable. This consultation is done during the design phase as well as after any course is delivered. Once the training is completed the employee is encouraged to evaluate all aspects of the course, including the frequency of the training and on relevance of the subject. When feedback is given by employees, the Refinery Training Specialist evaluates the feedback and makes the appropriate adjustments to the programs. Refer to the PSM Overview Procedure for detailed information on Maintenance training as well as R-10-002 Anacortes Training Plan, Section 9.0 Maintenance Training.

4.10.10 Hot Work Permit

Employee Participation in Hot Work Permitting is integrated into our work permit system. The intent of the work permit system is to have a discussion with all involved persons at the work site, so hazards can be addressed to the satisfaction of all. Permit recipients are given written information about the potential fire, explosion and toxic release hazards in the area in which they are working and the mitigation and PPE requirements. In addition, detailed information on chemicals is readily available electronically in the workplace in the form of SDSs. Refer to the Work Permitting & JHA Program procedure R-11-005 and supporting documentation for detailed information regarding the refinery work permit systems. (WAC§ 296-67-041, § 29CFR1910.119(k) and 40CFR Subpart D § 68.85 Hot Work Permit).

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4.10.11 Management of Change

All personnel affected by changes in the covered processes are required to be trained in the MOC (Management of Change) Procedure. Various levels of review and approval by operations, maintenance and technical personnel are required for affected changes. Refer to the Management of Change and Pre-Startup Safety Review Including Management of Organizational Change procedure R-12-006 for detailed information on the MOC systems. All employees must adhere to the requirement to conduct MOC review of any changes that are not "In-Kind" changes. Even the most minor changes must have a formal MOC review process if they are not "In-Kind." (WAC§ 296-67-045, § 29CFR1910.119(l) and 40CFR Subpart D § 68.75 Management of Change).

4.10.12 Incident Investigation

Incident investigations include having employees knowledgeable in the process involved in the incident investigation. In support of this effort ,employees can choose to be trained investigators. Contractor employees are also included on the investigation team if a contractor's work was involved. All incidents and near miss reports are forwarded to all company employees and contract company safety representatives. Incident and near miss reports are reviewed with employees whose job duties are relevant to the incident or its findings. Refer to the Incident/Near Miss Reporting & Incident Investigation Procedure R-12-007 for detailed information. (WAC§ 296-67-049, § 29CFR1910.119(m) and 40CFR Subpart D § 68.81 Incident Investigation).

4.10.13 Emergency Planning and Response

The Health & Safety Department is responsible for maintaining the plant emergency procedures, administering the Fire Brigade and Rescue Squad, conducting drills, annual HSE training, conducting incident critiques and implementing follow-up actions. Refer to the Emergency Response Manual R-16-001 for detailed information. (WAC§ 296-67-053, § 29CFR1910.119(n) and 40CFR Subpart E § 68.95 Emergency Planning and Response).

4.10.14 Compliance Audits

The results of audits and status of follow-up actions are shared with employees throughout the plant in regular meetings of teams, departments and work groups and are made available on the information sharing systems on the computers in the refinery. Compliance Audit teams are comprised of a cross-section of Refinery personnel, including represented employees. Refer to the PSM Compliance Audit Procedure R-12-008 for a description of the requirements for internal PSM auditing. Hyperlinks are contained in that document directing the user to the corporate standards for auditing requirements. (WAC§ 296-67-057, § 29CFR1910.119(o) and 40CFR Subpart D § 68.79 Compliance Audits).

4.10.15 Trade Secrets

Employees and Contractors may request access to process safety information at any time through their immediate supervisor. (WAC§ 296-67-061, § 29CFR1910.119(p) and 40CFR Subpart G § 68.152 Trade Secrets).

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## 5.0 PSM/RMP COMMUNICATION

The Process safety Council (PSC), consisting of appropriate Site Management, Site Supervision, and Employee Participation Representatives will be consulted during the development and revision of the site's Employee Participation element and plan. Initial meetings to communicate the PSM/RMP requirements and their implementation to employees were completed. Records of these meetings and follow-up meetings will be retained for five years after the training/review is completed. New employees are given PSM/RMP training as part of new employee orientation training.

The communication will be made in the following areas:

- Changes to the PSM Standards and Site Plans
- Results of applicable Process Hazards Analysis
- Investigations of applicable process safety incidents
- Process safety training requirements such as refresher training and training associated with Management of Change
- Results of applicable PSM audits

Face-to-face communication is recommended and is to be encouraged to help ensure two-way communication and an open environment for Management and Supervision to listen, understand, consider and act upon concerns and suggestions by employees and contractors, all of which can be essential to a strong PSM program.

The relay of PSM information is through the following: teams and committees (see Section 3.0), Points of Interest (POI), memos, audit results, and PHA Status Reports. The objective is to share information and to receive feedback from employees and their representatives on the conduct and development of PHAs and on other elements in the PSM standard.

## 6.0 DOCUMENT RETENTION

Plant H&S Committee minutes will be retained for five (5) years. Departmental H&S Committee minutes will be retained for one (1) year and Operating Team/Skill Group/Work Group Monthly Safety Huddle minutes, including any special purpose huddles requested by management, will be retained for one (1) year. The responsibility for retention will be with the individual departments. Records may be retained in hardcopy or electronic form.

## 7.0 ACCESS TO INFORMATION

Employees will have access to all PSM documents required by the regulation and as outlined under in the trade secrets sections of the referenced regulations. Employees should contact their supervisor or access on SharePoint or MPC Connect PSM pages. This applies to any process safety information that does not appear to be immediately available.

Contractors may obtain needed PSM information by request to their supervisor, or designated personnel either from their company or designated refinery personnel.

## 8.0 TRAINING

Employees are required to receive initial training upon assignment, and as necessary based on procedure updates.

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## 9.0 REVIEW AND REVISION HISTORY

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Revision #	Preparer	Date	Description
0	Mark Willand	4/19/2022	Reformatted and Numbered per Document Control Policy, R-63-001.
1	Jeremiah Harju	7/28/2023	Updated per 2022 PSM Self-Audit, and changed Dave Schollars to Brenda Rinesmith.

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## **10.0 ATTACHMENT 1 – PROTOCOL FOR MANAGING ACTION ITEMS GENERATED FROM DEPARTMENTAL AND CRAFT SAFETY MEETINGS**

Workflow Steps:

1. Zone Supervisors/Skill Group Supervisors and hourly Health/Safety Committee Members shall review draft meeting minutes to ensure issues and actions are correctly and clearly captured.
2. All action items will have a responsible person assigned.
3. All action items will be reviewed by the Zone Supervisor/Skill Group Supervisor and hourly Health/Safety Committee Members to affirm the issue surfaced is a health/safety related concern. Action items determined not to be a health/safety related concern will be discussed and removed from the health/safety meeting minutes. Regardless, they will be discussed and possibly forwarded on as a “best practice” to the appropriate manager for information/action. Affirmed safety related action items will have an SAP Work Order written, if applicable, or a request for engineering review made.
4. If a health/safety issue results in an SAP Work Order, the Zone Supervisor/Skill Group Supervisor will include the Work Order Number and estimated completion date in the Departmental/Craft Safety Meeting minutes prior to the next safety meeting.
5. Action items from health/safety issues with long-term completion dates shall be moved to a Long-Term Project (T/A/Engineering) Tracking List. Examples include solutions requiring engineering review/designs or Work Orders that can only be done during a shutdown or require long term capital budgeting.
6. Management, with concurrence from the represented Committee Members, can close out recommendations/actions for any of the following reasons:
  - A. The item has been completed
  - B. The analysis upon which the recommendation is based contains material factual errors
  - C. The recommendation is not necessary to protect the health and safety of the employees or contractors
  - D. An alternative measure would provide a sufficient level of protection
  - E. The recommendation is infeasible
7. After discussion, unresolved disagreement between management and represented Health/Safety Committee Members on how an item is managed shall be elevated to the Plant Health and Safety Committee for review/action.

## 11.0 ATTACHMENT 2 – EXAMPLES OF PARTICIPATION (RSP-1301 EXCERPT)

Marathon Petroleum Company LP	<b>Refining Standard Practice</b>	
PSM/RMP Employee Participation	Doc Number: RSP-1301	Rev No: 6

### Appendix A: Examples of Participation

#### A.1 Employee Participation

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

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

**Notes:**

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

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

*Continued on next page*



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Appendix A: Examples of Participation, Continued

A.1 Employee Participation (continued)

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

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.

## 12.0 ATTACHMENT 3 – EXAMPLES DOCUMENTATION FORM (RSP-1301-FORM1)

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### Appendix B: Example Documentation Form

**B.1 Form** The following form ([RSP-1301-FORM1](#)) can be used to document the review of PSM Elements.

**Reference:** For the most up-to-date working copy of this form, go to [http://cbgrs20/red/copyout.aspx?lib\\_no=32&doc\\_no=3156](http://cbgrs20/red/copyout.aspx?lib_no=32&doc_no=3156).

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

*Continued on next page*



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## Appendix B: Example Documentation Form, Continued

### B.1 Form (continued)

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

  

Action Items	Assigned To	Due Date