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RESPONSIBLE DEPT.	CONTENT CUSTODIAN	APPROVED BY	LEGACY NUMBER:	
HES&S	Diane Rusher	Shannon Logan	PS-08	
REVISION APPROVAL DATE: 09/19/2024		NEXT REVIEW DATE: 09/19/2029	MOC: N	REVISION: 3

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1.0 INTRODUCTION

1.1 Purpose

The purpose of this procedure is to outline the conduct and practice of the Anacortes Refinery's Process Safety Management Compliance Audit Program. The Process Safety Management (PSM) system is an integral part of the Marathon Anacortes Refinery and as such, is checked periodically to ensure that it is:

- Effective in practice, and
- Procedures and practices are current, accurate and are being followed.

1.2 Scope

The federal standard for Process Safety Management, OSHA 29 CFR 1910.119 (o) and Washington State standard for PSM, WAC 296-67-371, as well as the federal standard for the RMP rule 40CFR68.79, require that audits of the PSM system are conducted on a three-year cycle. Employers must certify that they have evaluated compliance with the provisions of this section at least every three years. The PSM/RMP Compliance audit program is the basis for demonstrating compliance with these requirements.

This procedure also includes requirements for PSM/RMP Self and Collaborative Audits in alignment with GEN-1016.

Changes to this procedure, per WAC 296-67-371, are effective December 27, 2024.

2.0 REFERENCES

2.1 Marathon Standards, Policies & Procedures

- R-12-001, PSM Overview
- RSP-1312, PSM/RMP Compliance Audits
- GEN-1016, HESS& PQ Auditing Process
- PSM-1070, Process Safety Management
- PSM-95005-RMP Guidance – Title V Deviation Reporting for RMP

2.2 Government Regulations

- WAC 296-67-371, Compliance Audits
- WAC 296-67-383, Corrective Action Program
- OSHA 29 CFR 1910.119 (o), Compliance Audits
- RMP 40 CFR 68.79

3.0 ROLES AND RESPONSIBILITIES

See RSP-1312 Section 2.0.

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4.0 AUDIT SCHEDULE AND CONDUCT

Audits must be conducted as described below to ensure that the procedures and practices developed for Process Safety Management are adequate and are being followed. Audit schedules are managed by Marathon Corporate and scheduling of the Tri-Annual PSM Audit (PSM/RMP Compliance Audit) is prompted by the PSM Coordinator.

4.1 PSM/RMP Self Audit

The PSM/RMP Self-Audit focuses on well-defined regulatory PSM/RMP and MPC requirements. A PSM/RMP Self-Audit Protocol must be used to direct the audit team through the audit. This level of audit is performed by facility personnel. Self-Audits must be executed via the audit module in Intalex. All data entry must be completed by February 15th of the following year for annual metrics reporting.

For minimum requirements of the PSM/RMP Self-Audit protocol, refer to the element checklists in Intalex. The following Self-Audit Protocols will be completed at the listed minimum frequency. Those with a 3-year minimum frequency must be completed at least once in a 3-year period regardless of credits allowed for other assessments.

A. Annually:

Intalex Checklist Number	Element
CK_12	Training (TRN)
CK_14	Contractors (CON)
CK_16	Management of Change (MOC) and Pre-Startup Safety Review (PSSR)
N/A	Management of Change (MOC) Metric Score Sheet, RSP-1312-MOCMSS
CK_28	Mechanical Integrity (MI)
CK_35	Mechanical Integrity (MI) ALT (12/31/2027)
CK_18	Safe Work Practices (SWP)
CK_36	Incident Investigation (II)
CK_24	Emergency Response and Planning (ERP)
CK_33	Building and Tent Siting (FS)
CK_34	Building and Tent Siting (FS) Alt (12/31/2031)
CK_32	EPA Risk Management Program (RMP)
CK_507	Recommendation Management (REC)
CK_4	Standard Gap Closure Plan (GAP)

B. Once every 3-years:

Intalex Checklist Number	Element
CK_37	Employee Participation (EP)
CK_38	Process Safety Information (PSI)
CK_41	Process Safety Information (PSI) ALT (12/31/2035)
CK_20	Process Hazard Analysis (PHA)/ Layer of Protection Analysis (LOPA)
CK_22	Operating Procedures (OP)
CK_26	Compliance Audits (CA)

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At the site's discretion, Self-Audit credit is allowed for certain elements of the following types of assessments in the year they are done. The site Audit Coordinator must establish a list of Assets within the scope of the audit and maintain a schedule for completing them

Assessment	PSM/RMP Compliance + Collaborative Audits	Process Safety Site Assessments (PSSA)	Mechanical Integrity Deep Dive	Operations Excellence
Credited Elements	All	Facility Siting	Mechanical Integrity	Training
		MOC/PSSR		Procedures
		Incident Investigation		
		Mechanical Integrity		
		Procedures		
		PHA/LOPA		
		Safe Work Practices		

RSP 1312 Section 5.5 contains the required audit team members.

Certification is not required for PSM/RMP Self-Audits.

- The Element Audit Team and Audit Leader will meet with the appropriate Element Champion to review compliance and/or gaps and initial recommendations to address gaps.
- The Audit Leader will compile audit documentation and prepare a summary for Site Management review.
- After reviewing the audit summary with Site Management findings/OFIs and recommendations will be entered into Intelex with Person Responsible, due dates, and approvers.
- Extensions and extension approvals must be managed by the site and documented in the change request workflow in Intelex.

Training requirements for self-audits are contained in RSP 1312 Section 3.1 and 5.9.

4.2 PSM/RMP Compliance Audit

PSM/RMP Compliance Audits will be the basis for establishing compliance with applicable regulations and standards. The PSM/RMP Compliance Audit will address all aspects and implementation of the PSM/RMP programs.

Complete and document PSM/RMP Compliance Audits at least every three (3) years. PSM/RMP Compliance audits must be performed before the specified anniversary of conducting the prior compliance audit rather than on a calendar year basis or report issuance. The specified anniversary of the compliance audit is defined as the date that the prior PSM/RMP Compliance Audit site visit began.

Team composition for PSM/RMP Compliance Audit is contained in RSP 1312 Section 4.5 and WAC 296-67-371 (2). As part of the compliance audit, the employer must consult with operators with expertise and experience in each process audited and must document the findings and recommendations from these consultations in the written report. The report must state the qualifications and identity of the persons performing the compliance audit.

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The PSM/RMP Compliance Audit Certification form found in Appendix B of RSP 1312 will be used to certify in writing that the Refinery has evaluated compliance with the provisions of 29 CFR 1910.119(o) and Subpart D of 40 CFR 68.79 and Part B of WAC Chapter 296-67 .

The PSM/RMP Compliance Audit report should be finalized within 90 days of the audit's closing meeting to ensure timely resolution of findings and recommendations. Report requirements are contained in RSP 1312 Section 4.7.

The employer must make the report available to employees and employee representatives. The employer must respond in writing within 60 days to any written comments submitted by an employee or employee representative regarding the report.

The Refinery must conduct a management review of the audit team's PSM/RMP Compliance Audit Findings, OFIs, and Comments and their proposed corrective and preventative recommendations to address the management system deficiencies. The Refinery must:

- Review and agree on proposed corrective actions intended to rectify the findings,
- Review and agree on proposed preventative actions to remedy the management systems' deficiencies and prevent future non-compliances related to the observed audit gaps, and
- Establishing priorities, timetables, resource allocation/requirements, and responsibilities for recommendation closure.

See RSP-1312 Section 4.8 for additional details and requirements for management review of findings, OFIs, and comments including inclusion in deviation reports for the Title V permit per the guidance document PSM-95005, and considerations for repeat findings.

All audit findings and OFIs and recommendations are tracked in Intelex. Target dates for completion of the recommendations are based on the date of the final audit report:

- Corrective actions for non-compliance findings must be completed within 12 months (18 months per WAC unless TAR required)
- Preventative actions for non-compliance findings must be completed prior to the start of the next audit
- Corrective and preventative actions for OFIs should be completed prior to the start of the next audit

See RSP-1312 Section 4.9 and WAC 296-67-383 for recommendation requirements including closure approvals and managing extensions.

The Refinery must request an extension when it knows it will not be able to complete a recommendation within twelve (12) months for non-compliance Corrective Actions or by the next scheduled audit date for non-compliance Preventative Actions. The request must be submitted to the HES&S Planning Committee and revisions to completion dates must be approved by the HES&S Management Committee. Completion dates for corrective actions may not exceed the time limits set forth in WAC 296-67-383 (i.e., 18 months or next scheduled TAR if a process shutdown is required) unless the Anacortes Refinery determines and documents (in accordance with R-12-005) that it is infeasible to complete the corrective action by the deadline specified in WAC 296-67-383.

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The Refinery must request an extension from the Refining PSM Manager for any OFI recommendations that will not be completed by the start of the next audit.

Training requirements for PSM/RMP Compliance Audit are contained in RSP 1312 Section 3.1 and 4.11.

4.3 PSM/RMP Collaborative Audit

The Refining PSM/RMP Audit Coordinator is responsible for implementing the PSM/RMP Collaborative Audit program. The PSM/RMP Collaborative Audit schedule is at the frequency specified by Section 2.0 in GEN-1016. Typically, a PSM/RMP Collaborative Audit is completed in conjunction with the 3-year PSM/RMP Compliance Audit for efficiency.

Certification is not required for PSM/RMP Collaborative Audits.

The audits are conducted in accordance with Marathon Standard RSP-1312. Please see RSP-1312 for further details on the audit team composition audit elements, audit protocol, report generation, action item tracking and closure.

A management review of all PSM/RMP Collaborative Audit findings should include, but not be limited to the following:

- Review of Findings, OFIs, and Comments,
- Appropriate Corrective and Preventative Actions that will successfully resolve audit findings and address causes of the findings, (resolution is not limited to the auditor's suggested recommendations), and
- Establishing priorities, timetables, resource allocation/requirements, and responsibilities for recommendation closure.
- OFIs may be rejected with agreement from the site management team and the Refining Process Safety Manager. Proper documentation and approvals must be documented in Intelex within the electronic record.

After reviewing the audit report with site management, final comments and recommendations for follow up will be entered into Intelex within 60 days of receiving the final report. See RSP-1312 section 6.9 for a complete list of recommendation requirements including extensions, approvers, and tracking.

Training requirements for PSM/RMP Collaborative Audit are contained in RSP 1312 Section 3.1 and 6.11.

Extensions for Findings and OFIs beyond the maximum allowable due date must be reviewed and approved by the Refining Process Safety Manager.

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The following describes the recommended collaborative audit program milestones.

Target Date	Activity
60 days prior to audit start	Site and Refining Audit Coordinators develops Audit Plan
30 days prior to audit start	Site provides requested documents provided to audit team
30 days after the last day of the audit	Lead Auditor provides draft report to Site
30 days of receiving draft report	Site provides draft report comments to Lead Auditor
Within 90 days of the last day of the audit	Lead Auditor finalizes report
Within 60 days of receiving the final report	Site enters Recommendations into Intelix

5.0 AUDIT RETENTION

Compliance Audits must be retained by the PSM Coordinator as per timelines defined below. These records are located in the PSM Storage Room and are accessible through the PSM Coordinator.

5.1 PSM/RMP Self Audit

Each refinery will retain its PSM/RMP Self Audit in Intelix for at least five (5) years. This duration allows the PSM/RMP Collaborative audit team and others to review the effectiveness of the facility's PSM/RMP Self Audit program. PSM/RMP Compliance Audit

The three most recent reports must be retained as controlled documents and available at all times for review and analysis. Electronic copy or access to the PSM/RMP Compliance audit reports will suffice for this requirement. PSM/RMP Collaborative Audit

The two most recent PSM/RMP Collaborative Audit compliance reports should be retained and available at all times for review and analysis. Electronic copy or access to the audit reports will suffice for this requirement.

NOTE: All RMP audit findings must be evaluated for inclusion in deviation reports for the refinery's Title V air permit.

6.0 TRAINING

Training requirements for Marathon Anacortes Refinery personnel are satisfied by issuance of refinery notifications to all employees when each 3-year audit (PSM/RMP Compliance Audit) is conducted, and when all recommendations and actions from an audit are completed.

Employees are made aware of the following:

- Dates of completion of the triennial PSM Compliance Audits (PSM/RMP Compliance)
- Recommendations, completion timing, actions and completion dates resulting from the PSM Compliance Audits (PSM/RMP Compliance)

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Individuals managing and/or coordinating PSM/RMP Compliance, Self-, or Collaborative Audits must complete the required training or meet qualifications based on credentials, expertise, and experience as determined by the PSM Manager. See RSP-1312 section 3.1 for a complete list of training required for Audit Teams, Audit Leaders, and Audit Coordinators.

7.0 REVIEW AND REVISION HISTORY

Revision #	Preparer	Date	Description
0	Mark Willand	4/4/2022	Reformatted and Numbered per Document Control Policy, R-63-001.
1	Evan Slodysko	12/21/2022	Updated sections 2, 3, and 5 per RSP-1312 revision 15
2	Evan Slodysko	5/12/2023	Updated sections 3.1 and 3.7 per RSP-1312 revision 17
3	Diane Rusher	9/19/2024	<p>Updated Section 4.2 per WAC 296-67-371.</p> <p>Added section 3 for Roles and Responsibilities.</p> <p>Added requirement to 4.1 (PSM Self Audits) for site to have data entered into Intelix by 2/15 for annual metrics reporting</p> <p>Updated 4.1 (Self Audits) to list protocols required annually or every 3-years with the caveat that the 3-year protocols must be completed as least one within three years regardless of the other credited assessments.</p> <p>Revisions Per WAC 296-67-300-Requirements for Petroleum Refineries to reduce the risk of process safety incidents by eliminating or minimizing process safety hazards to which employees may be exposed are effective December 27, 2024.</p> <p>Line by line review.</p>