Authored By: Paul Peter	Catlettsburg Refining, LLC	Doc No.: RSW-EP-AS-SWI-01 Rev No: 10
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PURPOSE

The purpose of this work instruction is to establish a formal process to identify and eliminate safety, health or environmental concerns. The Safety Action Process report is available for all MPC employees and contractors. The Safety Action Process (SAP) form is a communication tool that allows employees to identify a hazard and perform a preliminary hazard assessment by documenting the hazard's potential severity and likelihood. Equipped with a hazard risk ranking system, management can focus on the more difficult problems first, as determined on a hazard-importance hierarchy.

DEFINITIONS

- 1. **Safety, Health or Environmental Concerns** Refers to any circumstance, condition, practice or procedure that has caused or has the potential to cause an undesired event.
- 2. **Imminent Danger** A condition or practice that poses an immediate danger of death or serious harm to employees unless corrected.
- 3. **Severity** The degree of damage occurring as a result of the situation.
 - A. **Critical** Will result in severe injury, severe occupational illness, or minor property damage.
 - B. Catastrophic Will cause death or loss of facility.
 - C. **Other (Severity)** Any severity less than critical. May cause minor injury, occupational illness or property damage.
- 4. **Frequency –** The number of times an event occurs within a specified interval.
 - A. **Frequent** Likely to occurt immediately or in a short period of time.
 - B. **Probable** Likely to occur several times during the life of an item.
 - C. **Occasional** Likely to occur sometime during the life of an item.
 - D. **Other (Frequency)** Unlikely to occur but, may possibly occur in the life of an item.

RESPONSIBILITIES

- 1.0 Employees
 - 1.1 All refinery employees shall identify hazards in their work areas.
 - 1.2 Hazards shall include work conditions and practices.
 - 1.3 Upon hazard recognition, employees shall utilize the electronic SAP form to communicate the potential severity and likelihood.

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2.0 Originator

- 2.1 Complete the Origination Section of the SAP Form.
- 2.2 Provide all requested information including a detailed description of the hazard being identified, the severity, frequency and hazard ranking and the rationale for the hazard ranking.
- 2.3 Develop an action plan with the responsible party when appropriate.

3.0 Foreman

- 3.1 Review the SAP Form from the team supervisor and communicate the results of the review and hazard ranking within 14 days.
- 3.2 Follow up on the status of SAP forms, which originate in areas of responsibility.
- 3.3 Communicate with the originator and develop an action plan to correct the hazard when appropriate.

4.0 Supervisor

- 4.1 Review the SAP Form from the originator and assign a foreman responsible to address the SAP.
- 4.2 Follow up on the status of SAP Forms, which originate in areas of responsibility. Enforce the 14-day response time period for each level within areas of responsibility.
- 4.3 Develop an action plan to correct the hazard when appropriate.
- 4.4 Ensure that employees are implementing interim, temporary methods to decrease identified hazards while action plans are being developed and implemented.
- 4.5 Assign appropriate employees and target dates for the implementation of approved action plans.

5.0 Manager

- 5.1 Review the SAP Form from the originator, foreman and supervisor and communicate the results of the review and hazard ranking.
- 5.2 Follow up on the status of SAP Forms, which originate in areas of responsibility. Enforce the 14-day response time period for each level within areas of responsibility.
- 5.3 Develop an action plan to correct the hazard when appropriate.

6.0 **Division Manager**

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- 6.1 Review the SAP Form from the originator, foreman, supervisor and manager.
- 6.2 Follow up on the status of SAP Forms, which originate in areas of responsibility. Enforce the 42-day response time period for each level within areas of responsibility.
- 6.3 Develop an action plan to correct the hazard when appropriate.

7.0 **Refinery Management Team (RMT)**

- 7.1 Review and approve/disapprove action plans developed to correct hazards with rankings of Imminent Danger.
- 7.2 Review the status of open SAP Forms monthly to ensure that action plans are being implemented effectively.

8.0 Safety Department

8.1 Determine if an action plan is to be developed based upon the hazard ranking.

9.0 Full-Time Hourly Health and Safety Representative

- 9.1 Monitor compliance with the SAP process.
- 9.2 Ensure that action plans are documented and approved by the appropriate level of management.
- 9.3 Prepare reports and newsletter articles to inform the hourly workforce and management about the status of the SAP process.

REQUIREMENTS

1. Originator Tab

- A. The originator enters the SAP information in the Originator section.
- B. The originator saves the information and e-mails the form to the appropriate team supervisor.

2. Foreman Tab

- A. The team supervisor receives the e-mail and uses the SAP foreman form to assign the SAP to a foreman.
- B. The foreman receives the e-mail notification and enters information into the SAP foreman section.

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- C. If agreement is reached, develop an action plan to correct the hazard. Document the action plan in the Action Plan tab.
- D. If agreement is not reached, enter a rationale for why the ratings do not agree. Schedule a consensus meeting with the originator, foreman, hourly safety representative and salaried safety professional. Continue to the Consensus Page.

3. Consensus Tab

- A. The foreman schedules a consensus meeting and enters the consensus information.
- B. If agreement is reached, develop an action plan to correct the hazard. Document the action plan in the Action Plan section.
- C. If agreement is not reached, an e-mail is sent to the team supervisor.

4. Supervisor Tab

- A. The supervisor receives and e-mail and enters information into the supervisor section.
- B. If agreement is reached, develop an action plan to correct the hazard. Document the action plan in the Action Plan Section.
- C. If agreement is not reached, an e-mail is sent to the manager and the originator.

5. **Response to Supervisor**

- A. The originator receives an e-mail from the supervisor and enters information into the Response to Supervisor section.
- B. If the originator is satisfied with the supervisor's response, develop an action plan to correct the hazard. Document the action plan in the Action Plan Section.
- C. If the originator is not satisfied with the supervisor's response, continue to the Level 4 Manager Section.

6. Manager

- A. The manager receives an e-mail from the supervisor and enters information into the Manager section.
- B. If the manager agrees with the originator's hazard ranking, develop an action plan to correct the hazard. Document the action plan in the Action Plan Section.
- C. If the manager disagrees with the originator's hazard ranking, send an e-mail to the division manager, foreman, supervisor and originator.

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7. **Response to Manager**

- A. The originator receives an e-mail from the manager and enters information into the Response to Manager section.
- B. If agreement is reached, develop an action plan.
- C. If agreement is not reached, continue to the division manager level.

8. Division Manager

- A. The Division Manager receives an e-mail from the manager and enters information into the Division Manager section.
- B. If an agreement is reached, the division manager writes a written response and has the originator indicate if he is satisfied with the response in the next section. The Level 4 manager will develop an action plan. This action plan will be documented in the Action Plan section.
- C. If the division manager disagrees with the originator's hazard ranking, the reason is documented and saved.

9. **Response to Division Manager**

A. The originator receives an e-mail from the Division Manager and enters information into the Response to Division Manager section.

10. Support Group

A. Supporting information is entered into this section.

11. Action Plan

A. When the action plan has been entered, an e-mail is sent to the originator.

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Revision History

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Revision
History

Complete the following table for each document revision.

Rev. No.	Description of Change	Author	Approved By	Rev. Date	Effective Date
02	First document in Doc. Lib.	Rob Casto	RMT	04/07/04	04/07/04
03	Changed subject matter expert, revised header	Steve Bailey	RMT	07/13/04	07/13/04
	 (04) Updated header (05) Changed date (06) Made changed (07) Changed date and subject matter expert. 	Darin Barber	Darin Barber	07/13/04 09/23/08	07/13/04 09/23/08
	 (08) Changes Note: 1-8 (was previously Rev. 3) 4-8 should have been revisions. Point forward the revision number will be current 	Mike Stapleton	RMT	09/23/08	09/23/08
09	Added revision history	Dee Hill		07/23/14	
10	Changed Date Approved	Sarah Schneider		06/28/16	
11	Reviewed No Changes Necessary. Updated Header	Paul Peter	Greg Gibson	09/07/17	09/07/17