

Authored By: Keri Pomatto	Catlettsburg Refining, LLC <u>Marathon Petroleum Company LP</u> Department Of Transportation (DOT) Management Plan	Doc No. RSW-GS-P-01-CB Rev No: 12
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Table of Contents

1.0	OVERVIEW	3
2.0	PURPOSE	3
3.0	ABBREVIATIONS AND DEFINITIONS	3
4.0	OVERALL PROGRAM COMPONENTS	4
4.1	Applicability	4
4.2	Roles & Responsibilities	5
4.2.1	The DOT Coordinator	5
4.2.2	Training Coordinator	8
4.3	DOT Program Elements	12
4.3.1	HAZMAT Shipping Program	12
4.3.2	HAZMAT Registration	12
4.3.3	24-Hour Emergency Response Information Provider (MAPLINE)	12
4.3.4	DOT Bulletins	13
4.3.5	Catlettsburg Refining HAZMAT Shipping Policy	13
5.0	HAZARDOUS MATERIAL SHIPPING (NON-BULK AND INTERMEDIATE BULK CONTAINER (IBC) SHIPMENTS, EXCLUDING WASTE)	13
5.1	Roles & Responsibilities:	13
5.1.1	Material Controller	13
5.1.2	Primary HAZMAT Shipper	14
5.1.3	Back-up HAZMAT Shippers	14
5.1.4	Warehouse Loaders/Un-loaders	15
5.2	RAD Shipping HAZMAT Shipping Procedures	15
5.2.1	Shipment of Solids/Liquids/Gases	15
5.2.2	Shipment of Equipment	15
5.2.3	Shipment of Totes	15
5.3	Warehouse HAZMAT Shipping Program Elements	15
5.3.1	Warehouse Training Program	15
5.3.2	Warehouse HAZMAT Shipping Program Review	15
6.0	LABORATORY	16

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

- 6.1 Roles & Responsibilities: 16**
 - 6.1.1 Laboratory DOT Coordinator 16**
 - 6.1.2 Laboratory DOT Coordinator 16**
 - 6.1.3 Lab Technicians 16**
- 6.2 Laboratory Training Program 16**
- 6.3 Laboratory HAZMAT Shipping Program Review 16**
- 7.0 HAZARDOUS MATERIAL SHIPPING (WASTE, INCLUDES BULK AND NONBULK) 17**
 - 7.1 Roles & Responsibilities 17**
 - 7.1.1 Hazardous Waste Coordinator..... 17**
 - 7.1.2 Hazardous Waste Shipping Procedures 17**
 - 7.1.3 Hazardous Waste DOT Training Program 17**
 - 7.1.4 Hazardous Waste HAZMAT Shipping Program Review 17**
- 8.0 REGULATED MEDICAL WASTE 18**
 - 8.1 Roles & Responsibilities: 18**
 - 8.2 Regulated Medical Waste Training 18**
 - 8.3 Regulated Medical Waste HAZMAT Shipping Program..... 18**
- 9.0 HAZARDOUS MATERIAL SHIPPING (BULK, EXCLUDING WASTE AND TOTES)... 18**
 - 9.1 Products Control..... 18**
 - 9.1.1 Roles and Responsibilities 18**
 - 9.2 Operations 20**
 - 9.2.1 Roles & Responsibilities 20**
 - 9.2.2 Operations HAZMAT Shipping Procedures 22**
 - 9.2.3 Operations Bulk HAZMAT Shipping Training Program..... 22**
 - 9.3 Environmental Safety & Security (ES&S) 22**
 - 9.3.1 Roles and Responsibilities 22**
- 10.0 AUDITS 23**
- 11.0 REVISION HISTORY 23**

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

1.0 OVERVIEW

This guidance document outlines the requirements for implementation and maintenance of an effective management system at Catlettsburg Refining to comply with the United States Department of Transportation (DOT) requirements.

2.0 PURPOSE

The purpose of this management system is to ensure that all Catlettsburg Refining hazardous material shipments (products, samples, and waste) are prepared in accordance with all applicable U.S. Department of Transportation (DOT) regulations, to ensure employees are trained to enable them to perform their duties in compliance with all hazardous material regulations and in a manner ensuring the safety of personnel and property during transportation.

3.0 ABBREVIATIONS AND DEFINITIONS

3.1 Bulk Packaging:

Bulk packaging means packaging, other than a vessel or a barge, including a transport vehicle or freight container, in which hazardous materials are loaded with no intermediate form of containment and which has: (1) A maximum capacity greater than 450 L (119 gallons) as a receptacle for a liquid; (2) A maximum net mass greater than 400 kg (882 pounds) and a maximum capacity greater than 450 L (119 gallons) as a receptacle for a solid; or (3) A water capacity greater than 454 kg (1000 pounds) as a receptacle for a gas as defined in 49 CFR 173.115.

3.2 **CFR:** Code of Federal Regulations

3.3 **DOT:** Department of Transportation

3.4 **DOT PIPELINE JURISDICTIONAL ASSETS** – pipeline transportation facilities owned by REFINING, MARINE, and TT&R which are subject to the regulations of 49 CFR Parts 190-199, as may be amended.

3.5 **DOT Security Plan:** A written plan that meets the requirements of 49CFR172 Subpart I.

3.6 **FAA:** Federal Aviation Administration

3.7 **FMCSA:** Federal Motor Carrier Safety Administration

3.8 **FRA:** Federal Railroad Administration

3.9 **HAZMAT Employee:** HAZMAT employee means:

3.9.1 A person who is:

3.9.1.1 Employed on a full-time, part time, or temporary basis by a HAZMAT employer and who in the course of such full time, part time or temporary employment directly affects hazardous materials transportation safety;

3.9.1.2 Self-employed (including an owner-operator of a motor vehicle, vessel, or aircraft) transporting hazardous materials in commerce who in the course of such self-employment directly affects hazardous materials transportation safety;

3.9.1.3 A railroad signalman; or

3.9.1.4 A railroad maintenance-of-way employee.

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

3.9.2 This term includes an individual, employed on a full time, part time, or temporary basis by a HAZMAT employer, or who is self-employed, who during the course of employment:

3.9.2.1 Loads, unloads, or handles hazardous materials;

3.9.2.2 Designs, manufactures, fabricates, inspects, marks, maintains, reconditions, repairs, or tests a package, container or packaging component that is represented, marked, certified, or sold as qualified for use in transporting hazardous material in commerce.

3.9.2.3 Prepares hazardous materials for transportation;

3.9.2.4 Is responsible for safety of transporting hazardous materials;

3.9.2.5 Operates a vehicle used to transport hazardous materials.

3.10 **HAZMAT Employer:** HAZMAT employer means:

3.10.1 A person who employs or uses at least one HAZMAT employee on a full-time, part time, or temporary basis; and who:

3.10.1.1 Transports hazardous materials in commerce;

3.10.1.2 Causes hazardous materials to be transported in commerce; or

3.10.1.3 Designs, manufactures, fabricates, inspects, marks, maintains, reconditions, repairs or tests a package, container, or packaging component that is represented, marked, certified, or sold by that person as qualified for use in transporting hazardous materials in commerce;

3.11 **HAZMAT Training:** A Training Program that meets the requirements of 49 CFR 172 Subpart H.

3.12 **HMR:** Hazardous Materials Regulations, 49 CFR Parts 171 through 180

3.13 **IATA/ICAO:** International Air Transport Association/International Civil Aviation Organization

3.14 **IBC:** Intermediate Bulk Container

3.15 **Non-bulk:** Non-bulk packaging means a packaging which has: (1) A maximum capacity of 450 L (119 gallons) or less as a receptacle for a liquid; (2) A maximum net mass of 400 kg (882 pounds) or less and a maximum capacity of 450 L (119 gallons) or less as a receptacle for a solid; or (3) A water capacity of 454 kg (1000 pounds) or less as a receptacle for a gas as defined in 49 CFR 173.115.

3.16 **OPS:** Office of Pipeline Safety

3.17 **OQ:** – an Operator Qualification Program as defined by 49 CFR 195.505.

4.0 OVERALL PROGRAM COMPONENTS

4.1 Applicability

4.1.1 The Catlettsburg Refinery has designated the following positions as HAZMAT employees:

4.1.1.1 Non-Bulk Transportation: Sample Shipment / Parcels

- Lab (Chemist, Foreman)

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

- RAD Shipping
 - Warehouse (Warehouse person, Stores keeper)(IBC)
 - Warehouse Supervisor(s) (Material Controller) (IBC)
 - HES RCRA Professionals
 - Catlettsburg Medical
- 4.1.1.2 Bulk Transportation: Rail Car Loading & Unloading
- Products Control Loaders
 - Products Control Foreman
 - ISO Rack
 - Products Control Supervisor
 - Products Control Process Specialist
- 4.1.1.3 Bulk Transportation: Trucking
- Scale House
 - Products Control Loaders (Propane, Solvent, Sulfur)
 - HES RCRA Professionals

Specific training requirements for the above mentioned employees are maintained through the training department. Detailed training records for the above mentioned employees are kept on file with the training department. Emergency Response Team members have also been deemed subject to the DOT Drug and Alcohol testing as they may respond to an emergency involving DOT facilities.

4.2 Roles & Responsibilities

4.2.1 The DOT Coordinator

4.2.1.1 DOT Management System

The DOT Coordinator ensures that the management system is implemented, maintained, and updated as processes or regulations change, and all employees at Catlettsburg follow requirements set out in the management system.

The DOT Coordinator also serves as the Catlettsburg Refining central liaison for DOT Programs, maintaining direct lines of communication with the following key HAZMAT personnel who have primary oversight of HAZMAT shipping activities in their Areas, ensure compliance in their areas, and are the contact for day-to-day technical questions:

- 4.2.1.1.1 Non-Bulk (RAD Shipping): Primary Shipper
- 4.2.1.1.2 Bulk Rail/Truck (PIPC): PC Foreman/Operation Foreman
- 4.2.1.1.3 Pipeline : Pipeline Liaison
- 4.2.1.1.4 Bulk Waste (ES&S): Hazardous Waste Coordinator
- 4.2.1.1.5 Laboratory: Laboratory Coordinator
- 4.2.1.1.6 Training: Training Coordinator

4.2.1.2 DOT Training Program

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

The DOT Coordinator works with the Training Department to compile, maintain, and update the Catlettsburg training matrix to include applicable DOT training. They will also coordinate and receive input from identified key HAZMAT personnel who have primary oversight of HAZMAT shipping activities.

4.2.1.3 The DOT Coordinator:

- 4.2.1.3.1** Ensures the training matrix is updated as new HAZMAT job functions are added.
- 4.2.1.3.2** Reviews the training matrix with the Training Coordinator, at a minimum, on an annual basis.
- 4.2.1.3.3** Ensures all Catlettsburg HAZMAT job functions have been identified and their assigned HAZMAT training enables them to perform duties in compliance with all applicable hazardous material transportation regulations.
- 4.2.1.3.4** Ensures required information for recordkeeping is provided to the Training Department for off-site HAZMAT shipping classes attended by HAZMAT employees.
- 4.2.1.3.5** Required training for identified HAZMAT employees may include:
 - General Awareness Training
 - Security Awareness Training
 - Safety Training. OSHA Hazardous Communication Training is completed by all Catlettsburg employees on an annual basis, which meets this DOT Training requirement.
 - In-depth Security Training
 - Function-specific Training

The DOT Coordinator will successfully complete detailed HAZMAT shipping training, such as DGAC HMT-150 (Initial Multi-modal Transportation Training, 5 days) or equivalent. The DOT Coordinator also ensures that all HAZMAT employees who perform functions subject to the DOT Security Plan are trained to enable them to perform their duties in compliance with the Security Plan, and ensures DOT Risk Assessment component of the Security Plan is reviewed on an annual basis and any changes required based on process or regulatory changes are identified and incorporated. The annual review of the risk assessment security plan will include the identified key HAZMAT personnel who have primary oversight of HAZMAT shipping activities. The DOT Coordinator ensures appropriate revisions to the plans are made.

4.2.1.4 Primary Site Contact

The DOT Coordinator functions as Catlettsburg’s primary site-wide contact for DOT questions and issues. The DOT Coordinator is responsible for identifying solutions to such questions and issues. The DOT Coordinator also functions as the primary contact for DOT questions, issues and information dissemination with the Marathon Corporate HAZMAT contact.

The DOT Coordinator disseminates HAZMAT information received from Marathon Corporate (such as Safety Bulletins) to appropriate employees, and

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

communicates regularly with the identified key HAZMAT personnel who have primary oversight of HAZMAT shipping activities, ensuring Corporate level hazardous material shipping guidance is made available.

4.2.1.5 Contact Information

The Facility Primary DOT Coordinator Contact information is:

- Name: Keri Pomatto
- Phone Number: (606) 921-6407
- e-mail: klpomatto@marathonpetroleum.com

4.2.1.6 Compliance Checks

The DOT Coordinator conducts an annual Tier I Audit for all DOT HAZMAT shipping activities at the Catlettsburg Refinery, and also conducts the Tier I Audits in cooperation with each of the identified key HAZMAT personnel who have primary oversight of HAZMAT shipping activities in their areas.

4.2.1.6.1 Annual Tier I audit of HAZMAT shipping activities

The DOT Coordinator coordinates input from the identified key HAZMAT personnel who have primary oversight of HAZMAT shipping activities. The DOT Coordinator identifies and ensures resolutions are identified and documented for any regulatory observations or issues. The DOT Coordinator also functions as the primary contact and coordinator for audits of HAZMAT shipping activities at Catlettsburg conducted by Corporate/third-party auditors, and as the primary contact for audits of HAZMAT shipping activities at the Catlettsburg Refinery conducted by external government auditors (DOT, FAA, FRA, Pipeline Jurisdictional Assets).

4.2.1.7 DOT Security Plan

4.2.1.7.1 The Security Coordinator develops and implements a **DOT Security Plan**. The foundation of this Security Plan is a Risk Assessment. The DOT Coordinator assists Corporate HES with assessing the risk of Catlettsburg Refining hazardous shipping activities.

4.2.1.8 Management of Change (MOC)

The DOT Coordinator routes information about regulatory changes that may affect operations to the appropriate identified key HAZMAT personnel who have primary oversight of HAZMAT shipping activities. For all changes that occur with the potential to affect DOT HAZMAT shipping operations, the DOT Coordinator must participate in the review process and evaluate the activities set out in the MOC to determine what, if any, DOT HAZMAT shipping activities would be affected.

Questions to evaluate DOT compliance have been included in the Management of Change/Project Safety Review Criteria reviewed with each MOC written. If DOT issues are included, the DOT Coordinator is involved in the evaluation. If DOT HAZMAT shipping activities would be affected, the DOT Coordinator must identify and document any required changes to the DOT HAZMAT Shipping Program in the MOC and ensure all activities set out in the DOT Management Plan are reviewed, updated, and changed as required (e.g., Training Matrix,

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

Training Programs) prior to signing approval for the MOC. If DOT HAZMAT shipping activities are not affected by the MOC, the DOT Coordinator must sign the MOC certifying no changes to the DOT HAZMAT Program are needed.

4.2.1.9 Catlettsburg Refining HAZMAT Shipping Policy

Catlettsburg Refining policy establishes the RAD Shipping as the exclusive shipping point for shipping Non-Bulk HAZMAT shipments, excluding waste, and to communicate effectively to all employees.

4.2.1.10 DOT Hazard Classification Resources

The DOT Coordinator ensures RAD Lab Coordinator serves as the hazard classification Subject Matter Expert (SME) in the Laboratory to provide technical assistance with DOT hazard classification. Catlettsburg’s training department ensures HAZMAT employee receive hazardous material transportation training specific to hazard classification and is able to provide accurate classification assistance and communicates the availability of this Chemist to all employees.

Available resources for DOT hazardous material classification questions are local SMEs, Jack Bender (Corporate DOT Coordinator) 419-421-2563 or the URS HAZMAT Hotline 1-800-381-0664.

4.2.1.11 DOT Management System

The DOT Coordinator reviews this DOT Management System, at a minimum, on an annual basis to identify if changes are required; and communicates the DOT Hazardous Material Management Plan to all employees.

4.2.2 Training Coordinator

The Training Coordinator assigns required HAZMAT training based on HAZMAT employee’s job function as identified by the Training Matrix, and ensures training assigned to identified HAZMAT employees are successfully completed.

The Training Coordinator ensures DOT HAZMAT training records are maintained for all HAZMAT employees. Training records are maintained and readily accessible at the Training Department. The training must be current (training received within the past 3 years for DOT, 24 months for IATA/ICAO), and must correspond with Training Matrix assignments. Training records include:

- HAZMAT Employee’s name
- Most recent training completion date
- Description, copy, or location of training material
- Name and address of trainer
- Competent Person certification: This is to certify above-mentioned individual has completed the training in Hazardous Material Transport, was tested, and demonstrates a level of competence needed to fulfill the employee’s job function.

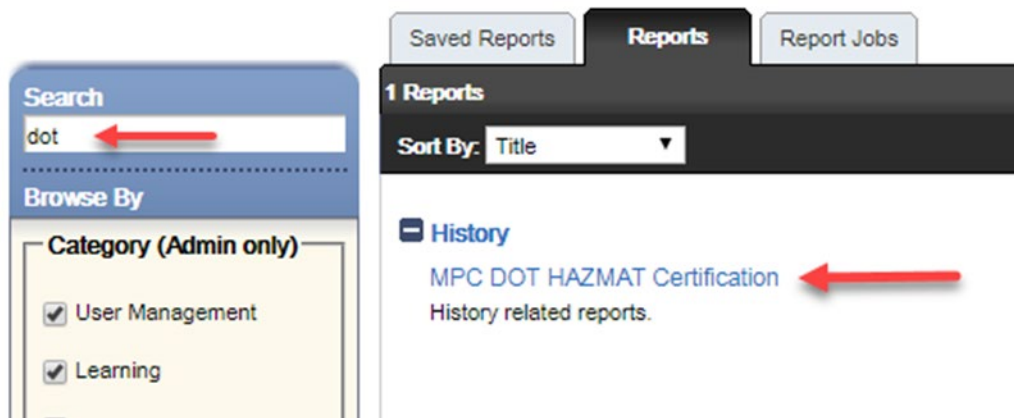
The Training Coordinator participates in an annual Tier I Audit of DOT HAZMAT Training records with the DOT Coordinator and ensures any observations/issues identified during these audits are corrected.

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Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

The DOT Training Records can be generated by following these steps:

- 1) Go to the reporting section of Passport Learning
- 2) Search DOT – and click on the MPC DOT HAZMAT Certification Report



- 3) Select the User(s) that you are wanting to review
- 4) Select the Items you are wanting to show on the report, if you are unsure if which items to include contact your Training DOT Coordinator
- 5) Run the Report and save or send as needed

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

Example of the DOT Training Records:



MPC DOT HAZMAT Employer Management Certification of Training

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Marathon Petroleum Company, LP (HAZMAT Employer) certifies that the following HAZMAT Employee(s) has/have completed training in Hazardous Material Transportation as required by 49 CFR 172.704 (a), was tested, and demonstrates a level of competence needed to fulfill the job function.

Employee Name (Employee #)		
Course:	CBG DOT Hazmat Employee Training (ITEM_CBG_11OPRBLD000)	Completed On: 1/2/14
Description:	DOT Hazmat Employee Function Specific Training: Cargo / RailCar Loading / Unloading This course is a compilation of all segments of Hazmat employee training requirements brought together in one complete package for qualification to load/unload railcars.	
Objectives:	1. To gain general awareness and familiarization of Rail Car Loading/ Unloading. 2. understand the definition of HAZMAT employer and employee, agencies that govern rail loading/unloading. 3. have an understanding of low/high pressure rail cars, tank car classifications, tank car safety systems, car markings and placarding. 4. understanding of basic regulations governing rail car loading/unloading, pre/post inspections and MPC checklist. 5. understanding of fluid sealing management. 6. understanding of NAR's, typical incident findings and legal liabilities.	
Name and Address of Trainer:	Marathon Petroleum Company, LP Findlay, Ohio	
Course:	CBG DOT Hazmat Employee Training Skill Assessment - Appendix C (ITEM_CBG_11OPRBLD000)	Completed On: 12/1/16
Description:	DOT Hazmat Employee Function Specific Training: Cargo / RailCar Loading / Unloading This course is a compilation of all segments of Hazmat employee training requirements brought together in one complete package for qualification to load/unload railcars.	
Objectives:	1. To gain general awareness and familiarization of Rail Car Loading/ Unloading. 2. understand the definition of HAZMAT employer and employee, agencies that govern rail loading/unloading. 3. have an understanding of low/high pressure rail cars, tank car classifications, tank car safety systems, car markings and placarding. 4. understanding of basic regulations governing rail car loading/unloading, pre/post inspections and MPC checklist. 5. understanding of fluid sealing management. 6. understanding of NAR's, typical incident findings and legal liabilities.	
Name and Address of Trainer:	Marathon Petroleum Company, LP Findlay, Ohio	
Course:	MPC WBT DOT Hazmat Aware/Familiarization (Praxis) (ITEM_MPC_00DOTSHP011)	Completed On: 12/1/16
Description:	This course is designed to familiarize you with the basic process used for labeling and marking hazardous materials for shipping. This course does not qualify you to prepare and offer transportation of hazardous materials.	
Objectives:	After completing this course the participant will be able to: Recognize and be able to identify hazardous materials consistent with the hazard communication standards of the DOT HAZMAT Regulation Subchapter C Parts 171-180	
Name and Address of Trainer:	Marathon Petroleum Company, LP Findlay, Ohio	

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12



MPC DOT HAZMAT Employer Management Certification of Training

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Employee Name (Employee #)		
Course:	MPC WBT DOT Hazmat Transportation Security (Praxis) (ITEM_MPC_00DOTSHP040)	<i>Completed On:</i> 12/1/16
Description:	<p>This course provides an overview on Marathon's Transportation Security Plan. This plan is designed to help employees identify vulnerable areas of our company's operation, reinforcing the importance of remaining alert and observant. It also establishes a network of resources where we can send information to help prevent or respond to terrorist actions, and deploy appropriate security measures, based on the potential threat, the overall Marathon threat condition level, and the assessed vulnerability of the transportation system or hazardous material operation.</p> <p>Name and Address of training provider: Online Training Marathon Petroleum Company, LP 539 South Main Street Findlay, Ohio 45840</p> <p>Location/Copy of training materials - Online Training - Course content and description located within Learning Management System. Material may be printed upon request.</p>	
Objectives:	<p>After completing this course the participant will be able to: Demonstrate awareness of the general HAZMAT security measures Understand the information contained in the facility DOT HAZMAT Transportation Security Plan</p>	
Name and Address of Trainer:	Marathon Petroleum Company, LP Findlay, Ohio	
Course:	MPC WBT DOT Rail Load/Unload (ITEM_MPC_00DOTSHP031)	<i>Completed On:</i> 12/1/16
Description:	<p>The purpose of this web-based training module is to help provide the necessary function-specific knowledge for employees loading or unloading railcars. This program deals with the requirements for loading/unloading HAZMAT rail tankcars, based on MPC inspection checklists.</p>	
Objectives:	<p>After completing this course, the participant will be able to: Demonstrate familiarity with agencies that govern rail transport, and penalties associated with Non Accident Releases Identify railcar controls, fittings, and required markings Use the required checklist to document pre-load/unload inspections Identify inbound and outbound inspection items and conditions common to pressure and general service rail cars Perform steps and checks such as securement of transfer, and confirming authorized packaging conditions, required before loading and unloading</p>	
Name and Address of Trainer:	Marathon Petroleum Company, LP Findlay, Ohio	
Course:	MPC WBT Hazard Communication (Praxis) (ITEM_MPC_00OSHWPH070)	<i>Completed On:</i> 1/30/14
Description:	<p>This course provides information on the OSHA Hazard Communication Standard. This program complies with Federal Regulation 29 CFR 1910.1200...</p>	
Objectives:	<p>After completing this course the participant will be able to: Identify key elements of OSHA's revised Hazard Communication (HazCom) standard Recognize key terms Describe the content and use of container labeling including pictograms and NFPA signs Describe the location, content and use of Safety Data Sheets Describe the physical and health hazards of substances Describe the types of harm that can result from overexposure to hazardous chemicals Identify exposure routes of hazardous chemicals Explain ways to reduce or prevent overexposure to hazardous chemicals</p>	
Name and Address of Trainer:	Marathon Petroleum Company, LP Findlay, Ohio	

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Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12



MPC DOT HAZMAT Employer Management Certification of Training

Generated: Jun 21, 2018, 7:08 AM

Employee Name (Employee #)		
Course:	MPC WBT Rail Tank Car Fluid Sealing Mgmt (ITEM_MPC_00DOTSHP061)	Completed On: 3/1/18
Description:	This training course will cover the proper handling of bolted and threaded connection on railroad tank cars. Descriptions of the types of gaskets used and definition of gasket creep will be addressed. Bolt torque definition and demonstration will be reviewed. A description of how dome lid bolts fundamentally work and the importance of cleaning bolt and valve threads are introduced. The role of a gasket in a bolted joint is described as well as the proper lubrication on a threaded connection. Participants will be introduced to the correlation between bolt torque and gasket pressure. The concept of bolt and thread stretching and how to close bolted and threaded connections is provided.	
Objectives:	After completing this course the participant will be able to: Understand the importance of selecting the correct gasket for the correct application on railroad tank cars Understand the concept of torque on the compression of gasket on railroad tank cars Understand the effect of lubrication on bolted and threaded connection on railroad tank cars Understand the importance of cleaning threaded connections on railroad tanks cars Understand the role of the Loader in the proper closure of bolted & threaded connection on railroad tank cars	
Name and Address of Trainer:	Marathon Petroleum Company, LP Findlay, Ohio	

SAMPLE

4.3 DOT Program Elements

4.3.1 HAZMAT Shipping Program

Catlettsburg must have a DOT Security plan that is current, accurate, and reviewed, at a minimum, on an annual basis. The Security Plan must be communicated and available to all affected employees.

4.3.2 HAZMAT Registration

The DOT HAZMAT shipping registration is renewed as required by the regulations by Marathon Corporate and provided to Catlettsburg. A copy of Catlettsburg's DOT HAZMAT shipping registration is kept on file.

4.3.3 24-Hour Emergency Response Information Provider (CHEMTREC)

CHEMTREC is a 24-Hour Emergency Response Service. At CHEMTREC, personnel are available to answer questions about HAZMAT shipments 24 hours a day while the shipment is in transportation.

The contact information for CHEMTREC is:

**For Hazardous Materials Incident
Spill, Leak, Fire, Exposure, or Accident
Call CHEMTREC Day or Night
CHEMTREC: 1-800-424-9300. Customer Number (CCN): 13740**

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

This information must be written on hazardous material bills of lading.

4.3.4 DOT Bulletins

DOT Bulletins address DOT HAZMAT shipping regulatory updates or important DOT HAZMAT shipping information are issued periodically from Marathon Corporate and sent to the DOT Coordinator for dissemination.

4.3.5 Catlettsburg Refining HAZMAT Shipping Policy

The RAD Shipping is the exclusive shipping point for shipping Non-Bulk shipments, excluding waste.

5.0 HAZARDOUS MATERIAL SHIPPING (NON-BULK AND INTERMEDIATE BULK CONTAINER (IBC) SHIPMENTS, EXCLUDING WASTE)

5.1 Roles & Responsibilities:

5.1.1 Material Controller

The Material Controller ensures all non-bulk HAZMAT shipments originating from Catlettsburg are shipped from the RAD shipping.

Catlettsburg's site-wide policy is for all non-bulk HAZMAT shipments to be shipped from the RAD shipping. All samples are routed through RAD shipping for proper packaging prior to shipment. Origin of shipments may include:

- Laboratories
- Operations/Process samples
- Samples of vendor chemicals
- Waste samples shipped offsite for evaluation
- Instrument Calibration
- Equipment repair

The Material Controller ensures all Warehouse employees involved in loading/unloading HAZMAT IBCs have been trained to enable them to perform their duties in compliance with all hazardous material regulations.

The Material Controller participates in the annual Training Matrix Review with the DOT Coordinator and Training Coordinator to identify all HAZMAT employees involved in Warehouse HAZMAT shipping activities and to make recommendations for HAZMAT training content.

The Material Controller participates in the annual Risk Assessment and Security Plan review with the DOT Coordinator to certify the Risk Assessment and Security Plan accurately reflect the risks and applicable security procedures.

The Material Controller contact information is:

- Job Title: Warehouse Supervisor
- Name: Gary Cook
- Phone Number: (606) 921-3854
- e-mail: gcook@marathonpetroleum.com

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

5.1.2 Primary HAZMAT Shipper

The Primary HAZMAT Shipper in the RAD Shipping prepares all non-bulk HAZMAT shipments shipped from Catlettsburg in a compliant manner. The Primary HAZMAT Shipper oversees HAZMAT shipping activities of Secondary HAZMAT Shippers to ensure they are correct and provides them practical training.

The primary HAZMAT Shipper establishes, documents, and ensures adherence to procedures for the proper preparation, shipment, loading/unloading of hazardous materials.

The Primary HAZMAT Shipper ensures procedures are developed to accurately reflect all HAZMAT shipping activities and are reviewed as processes or regulations change; at a minimum, annually.

The Primary HAZMAT Shipper ensures all non-bulk HAZMAT shipments are shipped from the RAD Shipping (excluding waste), prepared by trained HAZMAT employees, and is not shipped from any other location.

The Primary HAZMAT Shipper ensures sufficient shipping supplies to support HAZMAT shipments are available. These supplies would include labels; UN performance oriented packaging systems, documentation forms, and the most current regulatory manuals.

The Primary HAZMAT Shipper ensures signed copies of all prepared HAZMAT documentation is retained in the package preparation area for 2 years and readily accessible upon request.

The Primary HAZMAT Shipper follows all Catlettsburg HAZMAT Shipping Procedures; coordinates review from DOT Classification SME for non-routine HAZMAT shipments; and provides feedback from HAZMAT transporters to the DOT Coordinator concerning any identified HAZMAT issues. Prior to any HAZMAT shipment going off-site the primary or secondary HAZMAT shipper must review the paperwork and sign it. The Primary HAZMAT Shipper and the Secondary HAZMAT Shipper contact information is:

Primary HAZMAT Shipper

- Name: Stacy Perry
- Phone Number: (606)-921-6387
- e-mail: slperry@marathonpetroleum.com

Secondary HAZMAT Shipper

- Name: Tayler Justice
- Phone Number: (606) 921-6304
- e-mail: tmjustice@marathonpetroleum.com

5.1.3 Back-up HAZMAT Shippers

Back-up HAZMAT Shippers in the RAD shipping prepare non-bulk HAZMAT shipments shipped from Catlettsburg in a compliant manner. Prior to HAZMAT shipments going off-site the Primary or Secondary HAZMAT Shipper must review the paperwork. Back-up HAZMAT Shippers must follow all HAZMAT Shipping Procedures and provide feedback from HAZMAT transporters to the RAD shipping foreman concerning any identified HAZMAT issues.

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

5.1.4 Warehouse Loaders/Un-loaders

Warehouse Loaders/Un-loaders are responsible for the loading and unloading of HAZMAT totes. Warehouse Loaders/Un-loaders must follow all Warehouse HAZMAT Shipping Procedures, and receive appropriate HAZMAT training to enable them to perform their duties in compliance with all hazardous material regulations.

5.2 RAD Shipping HAZMAT Shipping Procedures

The below-listed RAD shipping HAZMAT Shipping Protocols are available to all Catlettsburg Refining employees:

5.2.1 Shipment of Solids/Liquids/Gases

For shipment of solids, liquids, or gases, follow Procedures for shipping HAZMAT samples.

Documentation required for off-site shipment may include:

- RAD Shipping Request Form
- SDS

5.2.2 Shipment of Equipment

For shipment of equipment, follow procedure in Shipment of Materials/Equipment Off-Site.

Documentation required for off-site shipment may include:

- SDS (if available)
- Technical specifications from manufacturer to show if HAZMAT present (e.g., batteries, radioactive source, calibration gas, mercury in switches, etc.)

5.2.3 Shipment of Totes

For shipment of totes offsite, follow Procedure for the Outbound Shipment of Empty Chemical Totes.

Documentation that may be required for off-site shipment (provided by vendor) includes:

- SDS of material
- Bill of Lading (or information to complete Bill of Lading)

5.3 Warehouse HAZMAT Shipping Program Elements

5.3.1 Warehouse Training Program

Warehouse employees must successfully complete training as identified by the Training Matrix, which enables them to perform their duties in compliance with all hazardous material regulations. Training records are retained by the Training Department.

5.3.2 Warehouse HAZMAT Shipping Program Review

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

The Material Controller, Primary HAZMAT shipper, and DOT coordinator will participate in an annual Tier I Audit of Warehouse HAZMAT shipping activities (including employee interviews) with DOT Coordinator. The Material Controller ensures any observations/issues identified during these audits are corrected. The annual Tier I audit will be retained in the DOT Files.

6.0 LABORATORY

6.1 Roles & Responsibilities:

6.1.1 Laboratory DOT Coordinator

Laboratory DOT Coordinator will assist in determining if materials meet DOT Hazard criteria for shipment. Hazard classification will be documented for the Primary Shipper.

The Primary DOT Lab Shipping Coordinator contact information is:

- Name: Stacy Perry
- Phone Number: (606) 921-6387
- e-mail: slperry@marathonpetroleum.com

6.1.2 Laboratory DOT Coordinator

The Laboratory DOT Coordinator ensures all Laboratory employees involved in HAZMAT Shipping activities have been trained to enable them to perform their duties in compliance with all hazardous material regulations.

The Laboratory DOT Coordinator participates in the annual Training Matrix Review with the DOT Coordinator and Training Coordinator to identify all HAZMAT employees involved in Laboratory HAZMAT shipping activities. They will also make recommendations for HAZMAT training content and communicate any identified HAZMAT shipping issues to DOT Coordinator who assists in identifying resolutions.

6.1.3 Lab Technicians

Package HAZMAT samples in sample containers and take samples to Environmental shipping for off-site shipment and select DOT sample gas cylinders.

6.2 Laboratory Training Program

Laboratory employees must successfully complete training as identified by the DOT Coordinator in the Training Matrix, which enables them to perform their duties in compliance with all hazardous material regulations. Training records are retained by the Training Department

6.3 Laboratory HAZMAT Shipping Program Review

The Laboratory DOT Coordinator will participate in annual Tier I Audit of Laboratory HAZMAT shipping activities with the DOT Coordinator. The Laboratory Foreman ensures any observations/issues identified during these audits are corrected.

The annual Tier I Audit will be retained in the DOT Files in the Safety Department.

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

7.0 HAZARDOUS MATERIAL SHIPPING (WASTE, INCLUDES BULK AND NONBULK)

7.1 Roles & Responsibilities

7.1.1 Hazardous Waste Coordinator

The Hazardous Waste Coordinator ensures DOT HAZMAT shipping compliance for off-site waste shipments and samples of waste being shipped offsite for waste profiling/waste classification evaluation.

The Hazardous Waste Coordinator ensures all Hazardous Waste employees involved in HAZMAT Shipping activities have been trained to enable them to perform their duties in compliance with all hazardous material regulations.

The Hazardous Waste Coordinator participates in the annual Training Matrix Review with the DOT Coordinator to identify all HAZMAT employees involved in Hazardous Waste HAZMAT shipping activities and to make recommendations for HAZMAT Training content.

The Hazardous Waste Coordinator participates in the annual Risk Assessment and Security Plan review with the DOT Coordinator to certify the Risk Assessment and Security Plan accurately reflect the risks and security procedures that apply to all Hazardous Waste HAZMAT shipping activities.

The Hazardous Waste Coordinator will review the waste generated at Catlettsburg to determine the proper DOT hazard classification, proper shipping name, UN number and packing group. The Hazardous Waste Coordinator coordinates with the Catlettsburg Laboratory DOT Coordinator for review and agreement of DOT hazard classification for Waste Profiles on an as needed basis. The MOC process will be utilized if new waste streams are generated.

The Hazardous Waste Coordinator prepares waste shipments for transport, working with waste vendors and participating in package selection, packaging, marking, labeling, and offering placards, loading/unloading.

The Hazardous Waste Coordinator must complete and retain the paperwork for each off-site waste shipment, and follow the procedures outlined below.

7.1.2 Hazardous Waste Shipping Procedures

Hazardous waste will be shipped in accordance with all state and federal requirements.

7.1.3 Hazardous Waste DOT Training Program

Hazardous waste employees must successfully complete training as identified by the DOT Coordinator in the Training Matrix. Training records are retained by the Training Department.

7.1.4 Hazardous Waste HAZMAT Shipping Program Review

The Hazardous Waste Coordinator ensures paperwork (i.e. manifests) is completed for each off-site waste shipment and retained. The Hazardous Waste Coordinator will participate in an annual Tier I Audit of Hazardous Waste HAZMAT shipping activities with the DOT Coordinator. The annual Tier I Audit will be retained in the DOT Files in the Environmental Department.

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

8.0 REGULATED MEDICAL WASTE

8.1 Roles & Responsibilities:

The Catlettsburg Medical has primary responsibility for ensuring DOT HAZMAT shipping compliance for off-site shipments of Regulated Medical Waste in compliance with all hazardous material regulations and is certifying shipments are prepared correctly.

8.2 Regulated Medical Waste Training

The Catlettsburg Medical department must successfully complete training as identified in the Training Matrix. Training records are retained by the Training Department.

8.3 Regulated Medical Waste HAZMAT Shipping Program

The Catlettsburg Medical department will participate in an annual Tier I Audit of Regulated Medical Waste HAZMAT shipping activities with the DOT Coordinator. The annual Tier I Audit will be retained in the DOT Files in the Safety Department.

9.0 HAZARDOUS MATERIAL SHIPPING (BULK, EXCLUDING WASTE AND TOTES)

9.1 Products Control

9.1.1 Roles and Responsibilities

9.1.1.1 Training Department

The training department participates in the Annual review of the training Matrix. The training department ensures all employees identified in the Training Matrix as HAZMAT employees are provided with DOT specific training.

9.1.1.2 Products Control Foreman

The Products Control Foreman ensures all HAZMAT shipped by bulk rail or truck from Products Control activity is prepared correctly for shipment, and all employees involved in bulk HAZMAT shipping activities have been trained to enable them to perform their duties in compliance with all DOT regulations.

The Products Control Foreman participates in the annual Training Matrix Review with the DOT Coordinator to identify all HAZMAT employees involved in bulk HAZMAT shipping activities and makes recommendations for HAZMAT training content.

The Products Control Foreman participates in the annual Risk Assessment and Security Plan review with the DOT Coordinator to certify the Risk Assessment and Security Plan accurately reflect the risks and procedures that apply to Products Control bulk HAZMAT shipping activities (except waste and totes).

The Products Control Foreman establishes, documents, and ensures adherence to procedures and guidelines for the proper preparation, shipment, and loading/unloading of bulk HAZMAT.

The Products Control Foreman ensures Bulk HAZMAT shipping procedures are developed which accurately reflect Products Control HAZMAT shipping

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

activities. Products Control foreman assures accuracy of procedures by reviewing as processes or regulations change or, at a minimum, annually.

The Products Control Foreman ensures all bulk HAZMAT shipments (excluding waste and totes) shipped from Catlettsburg is prepared by trained HAZMAT employees.

The Products Control Foreman receives and reviews regulatory updates from the DOT Coordinator and identifies if regulatory changes affect current bulk HAZMAT procedures in place. If changes to procedures are needed and an MOC is required, the Products Control Foreman ensures a thorough DOT HAZMAT Shipping Review is conducted using the MOC process. The Products Control Foreman participates in the MOC review process with the DOT Coordinator; ensuring required changes to HAZMAT shipping procedures are addressed.

The Products Control Foreman communicates any identified HAZMAT shipping issues to the DOT Coordinator, who assists in identifying resolutions.

The Products Control Foreman ensures any HAZMAT spills encountered during loading or unloading are addressed as required by the regulations and set out in Catlettsburg Refining procedures.

The Products Control Foreman serves as backup for the DOT Pipeline Liaison.

The Products Control Foreman is trained to perform duties in compliance with all hazardous material regulations as identified in the DOT Training Matrix.

The Products Control Foreman provides Primary Oversight for bulk HAZMAT shipments, excluding waste and totes. The Products Control Foreman contact information is:

- Name: Tadd Wallace
- Phone Number: (606) 921-6752
- e-mail: cwallace1@marthonpetroleum.com

9.1.1.3 DOT Pipeline Liaison

The DOT Pipeline Liaison ensures compliance with all DOT Office of Pipeline Safety (OPS) regulations for DOT Jurisdictional Assets within the refinery.

The DOT Pipeline Liaison ensures maintenance performed on the DOT Jurisdictional Asset is performed by the correctly trained party. Certain Maintenance activities are limited to OQ Qualified personnel.

The DOT Pipeline Jurisdictional Assets are pipeline transportation facilities owned by Refining but are subject to DOT jurisdiction and manage by Marathon’s Pipeline ES&R department in Findlay. Assets within the Catlettsburg refinery gates include the Owensboro to Catlettsburg crude metering station and the Campbell’s Branch to refinery metering station. The DOT Pipeline Liaison ensures procedures; roles and responsibilities are referenced by Catlettsburg employees.

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

The DOT Pipeline Liaison provides Catlettsburg Refinery primary oversight for DOT Pipeline activities. DOT Pipeline Liaison contact information is:

- Job Title: **Advanced Refining Product Control Coordinator**
- Name: **Chris Matney**
- Phone Number: **(606) 921-6925**
- e-mail: cdmatney@marathonpetroleum.com

9.1.1.4 Railcar Trainer (Designated Employees, PMU Operator)

The Railcar Trainer serves as Catlettsburg refining railroad tank car SME and on-site trainer.

The Railcar Trainer receives in-depth training on all aspects of railroad tank car loading and unloading procedures and regulations on an annual basis. The Railcar Trainer attends the annual Corporate “DOT Hazardous Materials Function-specific Training: Rail Tank Car Loading and Unloading.” Items covered in this training include:

- Updates to refining railroad Basic Practices.
- Updates to refining railroad tank car inspection checklists.
- Updates to Federal DOT and OSHA regulations related to railroad tank car loading and unloading.
- Federal Railroad Administration updates.

The Railcar Trainer trains all new HAZMAT employees who perform a HAZMAT shipping function with railcars and provides refresher training as needed for HAZMAT employees who may have been away from railroad tank car loading and unloading for some period of time.

The Railcar Trainer must successfully complete trainings as identified by the DOT Coordinator in the Catlettsburg DOT HAZMAT Training Matrix.

9.1.1.5 Operator

Operators follow appropriate guidelines when loading/unloading trucks or railcars.

Operators complete required training per the Training Matrix based on job function assigned.

Operators complete an initial, extensive training course applicable to the Operator’s specific job function. The training includes content on the following DOT topics, test questions, and questions on the final test, as appropriate:

9.2 Operations

9.2.1 Roles & Responsibilities

9.2.1.1 Operations Foreman

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

The Operations Foreman ensures all HAZMAT shipped by bulk truck from Operation activities is prepared correctly for shipment.

The Operations Foreman ensures all employees involved in bulk HAZMAT shipping activities in Operation activities at the applicable complex have been trained to enable them to perform their duties in compliance with all DOT regulations.

The Operations Foreman participates in annual Training Matrix review with the DOT Coordinator to identify all HAZMAT employees involved in Operation bulk HAZMAT shipping activities and makes recommendations for HAZMAT training content.

The Operations Foreman participates in annual Risk Assessment and Security Plan review with the DOT Coordinator. Certifying the Risk Assessment and Security Plan accurately reflects risks and procedures apply to all Bulk HAZMAT shipping activities (except waste and totes) conducted in Operation activities.

The Operations Foreman establishes, documents, and ensures adherence to procedures and guidelines for the proper preparation, shipment, and loading/unloading of bulk HAZMAT during Operation activities.

The Operations Foreman ensures bulk HAZMAT shipping procedures are developed to accurately reflect all HAZMAT shipping activities. The Operations Foreman ensures procedures are correct, up-to-date, and are reviewed as processes or regulations change; at a minimum, are reviewed annually.

The Operations Foreman ensures all bulk HAZMAT shipments shipped from each area are prepared by trained HAZMAT employees.

The Operations Foreman receives and reviews regulatory updates from the DOT Coordinator and identifies if regulatory changes affect current bulk HAZMAT procedures. If changes to procedures are needed and an MOC is required, the Operations Foreman ensures a thorough DOT HAZMAT Shipping Review is conducted using the MOC process. The Operations Foreman participates in the MOC review process with the DOT Coordinator; ensuring required changes to HAZMAT shipping procedures are addressed.

The Operations Foreman communicates any identified HAZMAT shipping issues in Operations to the DOT Coordinator, who assists in identifying resolutions.

The Operations Foreman ensures any HAZMAT spills encountered during loading or unloading activities addressed as required by the DOT regulations and Catlettsburg Refining procedures.

The Operations Foreman is trained to perform duties in compliance with all hazardous material regulations as identified in the Training Matrix.

9.2.1.2 Process Specialist

The Process Specialist is responsible for writing procedures for loading or unloading HAZMAT at a particular unit. The Process Specialist is responsible

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

for ensuring all aspects of applicable HAZMAT shipping regulations are addressed and included in the procedure.

The Process Specialist reports any identified hazardous material shipping issues to the Operations Foreman

9.2.2 Operations HAZMAT Shipping Procedures

Bulk HAZMAT shipping Procedures are set out in the specific guidelines developed for bulk loading/unloading operations, Operations Procedures

9.2.3 Operations Bulk HAZMAT Shipping Training Program

The Operator must successfully complete training as identified by the DOT Coordinator in the Training Matrix, which enables them to perform their duties in compliance with all hazardous material regulations.

Training records are retained by the Training Department.

9.3 Environmental Safety & Security (ES&S)

9.3.1 Roles and Responsibilities

9.3.1.1 Safety Supervisor

The Safety Supervisor participates in the annual Risk Assessment and Security Plan review with the DOT Coordinator to certify the Risk Assessment and Security Plan accurately reflects risks and procedures apply to all ES&S HAZMAT shipping activities.

The Safety Supervisor establishes, documents, and ensures adherence to procedures and guidelines for HES employees to achieve compliance with DOT activities.

9.3.1.2 Security Coordinator

The Security Coordinator ensures all Security HAZMAT employees involved in HAZMAT shipping activities have been trained to enable them to perform their duties in compliance with all hazardous material regulations.

9.3.1.3 Security Guards (under contract)

The Security Guards implement requirements of the DOT Security Plan concerning personnel security, unauthorized access.

The Security Guards must successfully complete training as identified by 49 CFR 172 Subpart H. Training records is retained at their Security Office.

9.3.1.4 Emergency Response Team (ERT)

As First Responders to DOT Pipeline jurisdictional assets, the ERT is required to participate in MOC DOT Drug and Alcohol Testing Program. The ERT must

Catlettsburg Refining, LLC	Program	
Title: Department Of Transportation (DOT) Management Plan	Doc Number: RSW-GS-P-01-CB	Rev No: 12

follow Procedures and Roles and Responsibilities for compliance with DOT pipeline jurisdictional assets owned by Catlettsburg Refining.

Catlettsburg Refining ERT members are exempted from the DOT CDL requirement per the MOC Legal Memorandum.

9.3.1.5 Supervisors of ERT Members

The Safety Supervisor and Fire Chief must receive WBT Drug and Alcohol Policy Training for Supervisors, which includes the physical, behavioral, speech, and performance indicators of likely alcohol misuse and use of controlled substances (at least 60 minutes of training on alcohol abuse and at least an additional 60 minutes training on controlled substances use) [49 CFR 382.603] due to their supervision of ERT Team during emergencies. Training records are retained by the Training Department.

10.0 AUDITS

10.1 Tier I audits will be conducted annually.

11.0 REVISION HISTORY

Revision number	Description of change	Written by	Approved by	Revision Date	Effective Date
0	Origination	DOT Coordinator	DOT Coordinator	06/09/2010	06/21/2010
1	Update information	DOT Coordinator	DOT Coordinator	05/29/2013	05/29/2013
2	Update information	DOT Coordinator	DOT Coordinator	1/13/2015	1/30/2015
3	Updated names	DOT Coordinator	DOT Coordinator	01/08/16	01/08/16
4	Updated names	DOT Coordinator	DOT Coordinator	06/27/16	06/27/16
5	Updated DOT Coordinator contact information	Keri Pomatto	Greg Gibson	9/26/2016	9/26/2016
6	Changed MSDS to SDS	Keri Pomatto	Greg Gibson	9/6/2017	9/6/2017
7	Updated 24-Hour Emergency Response Information Provider from MAPLINE to CHEMTREC	Keri Pomatto	Greg Gibson	6/1/2018	6/1/2018
8	Updated Laboratory DOT Coordinator	Keri Pomatto	Seth Overly	8/29/2018	8/29/2018
9	Added how to obtain DOT HAZMAT training information and pasted an example of that report.	Keri Pomatto	Greg Gibson	2/8/2019	2/8/2019
10	Added contact information for the Secondary HAZMAT Shipper	Keri Pomatto	Greg Gibson	8/27/2019	8/27/2019
11	Updated contact information for Secondary HAZMAT Shipper and DOT Pipeline Liaison.	Keri Pomatto	Greg Gibson	7/28/2020	7/28/2020
12	Updated contact information for Material Controller, Products Control Foreman, Secondary HAZMAT Shipper and DOT Pipeline Liaison.	Keri Pomatto	Greg Gibson	7/21/2021	7/21/2021