

PSM/ RMP Guidelines for Employee Participation

(provided as a training example only)

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Document Purpose: This document summarizes how GCAP complies with the requirements of OSHA's PSM 29 CFR §1910.119(c) and the EPA's 40 CFR §68.83 elements relating to Employee Participation.

Scope: The purpose of these elements is to provide for a cooperative participatory environment and ensure the necessary flow of information from management to employees and from employees to management on process safety to eliminate or mitigate the consequences of catastrophic releases of highly hazardous chemicals in the workplace. It is the goal of GCAP's Employee Involvement program to involve the employees who operate the process at a fundamental level. Many times this participation is referred to as consultation; to paraphrase CPL 02-02-45, "Consultation refers to a two-way dialogue between the employer and the employees and their representatives (where they exist), in which the employer elicits, and responds to, employees' concerns and suggestions bearing upon the elements of process safety management... Consultation is therefore more than a way to inform employees about aspects of process safety; it is a process of seeking advice, criticisms, and suggestions from employees and their representatives."

GCAP has developed this written plan on employee participation which includes employee involvement in the Process Hazard Analysis and **all** other elements of the PSM/RMP Program; Access is also provided to all the documentation developed under the PSM/RMP standards to the affected employees. For the purposes of this PSM/RMP Program, GCAP will consult with contractors to the same extent that they consult with a similarly situated employee.

References:

- 29 CFR §1910.119, *Process Safety Management of Highly Hazardous Chemicals*, paragraph (c).
- 40 CFR §68.83, *Chemical Accident Prevention Provisions*
- OSHA Instruction CPL 02-02.45A, *Process Safety Management of Highly Hazardous Chemicals – Compliance Guidelines and Enforcement Procedures*, September 13, 1994.

Implementation Overview: All employees of GCAP affected or potentially affected by the ammonia refrigeration process are made aware of the PSM/RMP program being implemented in the facility. GCAP has, and will continue to:

- Develop this written plan of action regarding the implementation of the employee participation required.
- Consult with employees on the conduct and development of process hazard analyses and on the development of other elements of the standard.

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- Provide to employees, and employees of contractors whose work is covered by the PSM/RMP Program, ready access to all PSM/RMP Program files and documents upon request.
- Make use of a PSM team comprised of employees and supervisors that actively engages in the implementation and management of the PSM/RMP Program.
- Provides a “suggestion box” where employees are encouraged to offer their suggestions to improve the process or the PSM/RMP Program that covers it.

Procedures: The employee participation procedures fall into the following basic areas:

- 1) **Employee awareness:** New employees are made aware of the ammonia refrigeration PSM/RMP Program as a part of the initial orientation process, in conjunction with hazards communication required by 29 CFR §1910.1200. The document, “GCAP Ammonia Refrigeration Process Safety”, (Form EP-2) or equivalent has been developed and is reviewed with each new employee. Employees acknowledge their awareness of PSM/RMP Program by signing document, (Form EP-1) or equivalent. The Form EP-2 or equivalent is also prominently posted in the employee break room. All affected employees are given the same PSM/RMP Program orientation provided to new employees. Operators receive additional training in PSM – see the Operator Training guidelines.

The Responsible Person, in conjunction with the PSM team, is responsible for an annual update on PSM/RMP Program, providing update information, such as an annual PSM/RMP Program status report for the facility.

Any Major ammonia refrigeration events such as incidents, near misses, major system modifications or expansions as well as PSM/RMP Program information changes are communicated to the affected employees.

- 2) **Employee involvement/participation:** GCAP’s PSM team is comprised of the Responsible Person, the Safety Coordinator and at least one hourly operator from each shift. At least one hourly employee directly involved in the operation or maintenance of the ammonia refrigeration system is represented in all meetings and/or formal discussions concerning ammonia refrigeration PSM/RMP Program policies and procedures.

Through the PSM team and other avenues, hourly employees with relevant process knowledge and experience (such as Refrigeration Operators) are formally included in the PSM/RMP Program development and implementation as follows:

- Process Safety Information (PSI): The location and accessibility of the PSI are communicated to all refrigeration operators during their initial training. P&IDs are reviewed for accuracy and thoroughness by the operators during their use.
- Process Hazard Analysis (PHA): As discussed in the PHA Guidelines, The Process Hazard Analysis team includes one or more hourly employees. All employees are encouraged to provide input on relevant PHA topics such as facility siting and human factors through the PSM team.
- Operating Procedures: Developed with input from operations, management, safety and other groups as necessary. SOPs are reviewed for accuracy and thoroughness by the operators during their use.
- Training: Programs and needs for refresher training are reviewed with affected employees with an annual questionnaire.

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- Pre-Startup Safety Reviews and Management of Change: Conducted with involvement of at least one hourly employee. MOCs and PSSRs are reviewed by the PSM team. Employees are encouraged to offer their input on suggested MOCs or the MOC process through the PSM team.
- Mechanical Integrity: Mechanical Integrity audits are conducted with the involvement of at least one hourly employee. Recommendations and intended resolutions are reviewed by the PSM team. All audits are available for review by all affected employees. Employees are encouraged to continuously audit the performance of the Mechanical Integrity program and the adherence to the Mechanical Integrity program by other employees and contractors.
- Incident Investigation: Reports are reviewed with all affected employees. (An hourly employee may be asked to serve on the investigation team as appropriate.) All employees are encouraged to report issues they believe warrant an Incident Investigation.
- Emergency Planning and Response: Procedures are reviewed with affected employees. Training of response personnel also includes hourly personnel. The PSM team reviews the EPR plan for accuracy.
- Compliance Audits: At least one hourly employee is involved in the audit conducted every three years. Recommendations and intended resolutions are reviewed by the PSM team. All audits are available for review by all affected employees.
- Contractors: Employees are encouraged to fill out CQ-6 forms to document their opinions on the performance of contractors who work on or near the covered process. CQ-6 forms are reviewed by the PSM team. Employees are encouraged to continuously audit the performance of the Contractor program and the adherence to all safe work practices by contractors.
- Hot Work: Employees are encouraged to continuously audit the performance of the Hot Work program and the adherence to the Hot Work program by other employees and contractors.

All employees involved in operating the process are informally involved in all aspects of the PSM/RMP program through regular PSM/RMP meetings. Additionally, an Open-Door policy and a suggestion box are available avenues for any employee with suggestions for improvements to the program.

Any employee having serious safety related concerns about any aspect of the PSM/RMP Program for ammonia refrigeration have been instructed to submit those concerns in writing to the Responsible Person. Within 30 days the employee is provided with a written response answering his/her concerns.

Minutes of PSM/RMP Program consultations with hourly employees are prepared. Minutes reflect the input and opinions of the hourly employees.

A record is kept of all employee recommendations. Affected employees are informed of the disposition of all recommendations. Copies of all PSM documentation are made available to all affected employees.

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- 3) **Employee access to information:** The Responsible Person is responsible for controlling access to PSM/RMP Program information. All employees are provided access to ammonia refrigeration PSM/RMP Program files and information, but access is governed by the following limitations:

- Approval is needed to remove any original documents from the file.
- Original copies of documents are not removed from the file area.
- Requests for copies of materials are honored within 10 working days of the request.
- No markings are made on original documents.
- Previously unfiled documents are not added without the proper authorization.

All employees directly involved with the operation and maintenance of the ammonia refrigeration system are provided “Read Only” access to the entire PSM/RMP program on the company intranet and periodically review the process safety information and most recent hazard analyses. Such reviews are considered to be a training activity.

GCAP provides access to process hazard analyses, and all other information required to be developed under the PSM/RMP Program, to employees of contractors whose work is covered under the PSM/RMP Program. GCAP informs contract employees of their right to obtain information, and the means for doing so.

Forms: The following forms are suggested for use. These forms do not have to be used as part of this procedure as long as similar forms or documentation is kept that meets the requirements of this element.

- Verification of Awareness of Ammonia Refrigeration Process Safety Information Form (*Form EP-1*)
- GCAP Ammonia Refrigeration Process Safety (*Form EP-2*)

Document Management: There are several documents that serve a function within the employee participation arena. The following sub-files are used:

PSM/RMP Program Awareness: Each new or current employee signs off on the one-page “Verification of Awareness of Ammonia Refrigeration Process Safety Information” document (Form EP-1) or equivalent as verification that they are aware of the existence of the facility’s PSM program for ammonia refrigeration. A “PSM Awareness” record should be maintained within the Employee Participation Master file which includes the names and dates of new employee orientations. Documentation of training is maintained by the Safety Department.

PSM/RMP Program Employee Communication: Any bulletin board announcements or employee newsletter articles relating to ammonia refrigeration PSM should be filed by the Safety Department and should be retained for a minimum of five years.

Employee Concerns/Responses: Any written statements of safety concern from employees along with written responses should be filed by the Safety Department and should be retained for a minimum of five years.

Employee Meetings/Consultations: GCAP maintains a file of PSM/RMP Program meeting minutes. Minutes include a complete list of attendees and are routed to all Refrigeration Operators.

Personnel: Refer to the Program Activities document (**Ammonia PSM-RMP Program Activities**) in the Risk Management Plan binder to ascertain the person or position responsible for ensuring this program element adheres to these guidelines.