

EMPLOYEE PARTICIPATION

Revision History

Rev. #	Description of Change	Date	Revised By
0	Initial Issue	July 2016	PSM RMP Solutions

Purpose

The purpose of this employee participation program is to ensure employee involvement in the development and implementation of all parts of this PSM/CalARP Program. The program will not be effective without the involvement of the employees and/or their representatives.

This document summarizes how Inland Star Distribution Centers, Inc. complies with the employee participation requirements for the storage of hazardous chemicals at Inland Star Distribution Centers, Inc. Inland Star Distribution Centers, Inc. has established an employee participation program for all employees who are involved in the handling of hazardous chemicals. Employee participation is provided by making employees aware of the PSM/CalARP Program information, involving them in the development and ongoing maintenance of various elements, and providing access to the PSM/CalARP Program related information. Contract employees who perform the same duties as direct-hire employees are required to participate in the PSM/CalARP Program.

Responsibilities

The Director of EHS³ has overall responsibility for ensuring that the employee participation program guidelines are met for the storage of hazardous chemicals.

Employee Participation Procedures

The employee participation section of the PSM/CalARP Program has four parts:

- 1) Employee Awareness
- 2) Employee Involvement
- 3) Employee Access to Information
- 4) Recordkeeping

Specific procedures that should be followed within each of these parts are provided below.

1) Employee Awareness

All facility personnel will be given a site safety orientation. The orientation will typically be conducted and documented by the General Manager, Operations. The following topics will be reviewed during the site safety orientation:

- An overview of the storage of hazardous chemicals, including a description of the specific safety and health hazards associated with the chemicals.
- A general description of the PSM/CalARP Program requirements.
- A description of the company safe work practices.
- A discussion of the site specific emergency action plans as it relates to the employees.

Refresher training on the items addressed during the site safety orientation will be given to employees on an annual basis.

2) Employee Involvement

Authorized employees and potentially affected employees will be involved during the development and ongoing maintenance of the PSM/CalARP Program. Their involvement will include the following items:

- Employees are given an overview of the PSM/CalARP Program as part of the facility safety orientation. Input received from them during the orientation is incorporated into the PSM/CalARP Program, as applicable.
- Employees verify Process Safety Information for thoroughness and accuracy.
- Each Process Hazard Analysis team includes at least one employee who has experience and knowledge specific to the storage of hazardous chemicals being evaluated. Any recommendations identified during the process hazard analysis are reviewed with the employees.
- Employees review the procedures and update them as necessary to ensure they are current and accurate. Their input is also solicited for the creation of new procedures.
- Any changes associated with the Training Program are reviewed by the employees to ensure their input is incorporated into the final program, especially with respect to the requirements for refresher training intervals. More experienced employees also participate in the Training Program by observing the demonstration of job tasks conducted by less experienced employees.
- Employees are involved during Pre-Start-up Safety Review and Management of Change procedures. This involvement includes participation during any health and safety reviews of changes in chemical inventory. In addition, all facility employees who are affected by the changes in chemical inventory are informed of and trained in the change.

- Any changes to the Mechanical Integrity Procedures are reviewed by the employees to ensure their input is incorporated into the final procedures, especially with respect to inspection intervals.
- Each incident investigation team contains at least one employee knowledgeable in the process involved in the incident, and other employees with appropriate knowledge and experience to thoroughly investigate and analyze the incident. The results of the incident investigations are reviewed by appropriate personnel.
- Employees are consulted during any revisions to the Emergency Action Procedures, the Contractor Procedures, and the Safe Work Practices.
- Each compliance audit team includes at least one employee who has experience and knowledge specific to the process being audited.

3) Employee Access to Information

All affected and authorized employees, including contractor employees, will be provided access to the process hazard analyses and other information required by the PSM/CalARP regulations.

Employees will have access to all sections of the PSM/CalARP Program.

The General Manager, Operations is responsible for controlling access to the PSM/CalARP Program information. All employees will be provided access to the storage of hazardous chemicals PSM/CalARP Program files and information at all times during normal business hours but access may be governed by the following limitations:

- Approval is needed to remove any documents from the file.
- Original copies of documents should not be removed from the file area.
- No markings should be made on original documents.
- Previously unfiled documents should not be added without proper authorization.

All employees directly involved with the handling of hazardous chemicals will be encouraged to periodically review the process safety information and most recent process hazard analysis. Such reviews should be considered to be a training activity and can be conducted on company time.

4) Recordkeeping

The General Manager, Operations will ensure that employee participation is documented. Employee awareness will be documented. All other forms of participation will be documented using an attendance sheet, meeting notes, or formal report in regards to the program element being implemented or updated. For example, employee involvement in the Management of Change process will be documented on the MOC form.

Employee participation documentation will include:

- The name and title of the employees who were involved in the development and implementation of the PSM/CalARP Program.
- The date of the participation.
- A description of the employee participation.