

TRADE SECRETS

Revision History

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

Purpose

The purpose of this trade secrets plan is to document the procedures which ensure that employees are provided with information while still protecting company secrets.

Responsibilities

The Director of EHS³ is responsible for the following activities:

- Controlling access to PSM/CalARP Program information at this facility.
- Determines whether any PSM/CalARP Program information should be designated as trade secret information.
- Specifying the rules and procedures which should be followed to access the trade secret information, including the use of any confidentiality agreements.

Procedures for Meeting the Trade Secrets Requirements

The trade secrets plan:

- 1) Requires employers to make information that is necessary to comply with the standard, available to all persons involved in the development and management of the PSM/CalARP Program without regard to possible trade secrets;
- 2) Describes the confidentiality agreements which can be used to protect trade secret information; and,
- 3) Specifies the rules and procedures which should be followed to allow employees and their representatives access to trade secret information.

Currently, no documents contained in the PSM/CalARP Program files contain trade secret information, and no confidentiality agreements (or other forms) need to be filled out when reading or using this information. The Director of EHS³ will ensure that these materials are available when requested or when needed, especially during the following tasks:

- When compiling the written Process Safety Information;
- When conducting Process Hazard Analyses studies;
- When developing written Operating Procedures;
- When conducting incident investigations involving hazardous chemical-related incidents;
- When participating in emergency action or response activities; and,
- When conducting compliance audits.

The Director of EHS³ is also responsible for controlling access to PSM/CalARP Program information at this facility. The Employee Participation Program describes the procedures that are followed to ensure all facility personnel have access to this information.