Meraux Refinery Operator Training Program

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Policy

It is the policy of the Meraux Refinery that all operators shall be fully trained in the required procedures of operations and in the refinery's safe work practices. This training shall include the operating procedures for the following of the process units:

Startups

- o Initial startup: a procedure to put a new process unit on line.
- o Cold startup: a procedure to put a process unit on line after a turnaround.
- Hot startup: a procedure to put a process unit on line after a shutdown.
- Normal operation: procedures which address day-to-day activities within the process unit.
- **Shutdown**: a procedure for shutdown and isolation of a process unit or equipment within the process unit for turnaround or repair.
- **Emergency shutdown**: a procedure for a rapid, unscheduled shutdown of a process unit resulting from, but not limited to, equipment failure, loss of utilities, loss of a support process unit or a potentially catastrophic situation.
- Temporary operation: short-term operation while some part of the process unit is bypassed or isolated
 for maintenance or when parameters are temporarily changed enough to cause a difference in product spec
 and / or how the process is operated.

Responsibility

The Area Supervisors are responsible for developing, revising, and maintaining the training materials for their respective areas.

Goals

The Operator Training Program was developed with the following goals:

- To ensure the refinery of a supply of competent personnel to cover expected growth, promotions and anticipated attrition.
- To increase the knowledge, skill and performance of operations personnel.
- To provide a standardized method for the training and development of operating personnel.
- To create a greater interest in jobs through increased skill, knowledge and consistent performance.
- To comply with the requirements of the OSHA PSM regulation, 29CFR1910.119.
- To assure compliance with all required environmental, health, safety, and security, training requirements.
- To minimize the likelihood of safety and environmental incidents, to protect the corporate assets and the community in which we live and operate.

Procedure

Organization: The training of refinery employees shall be the responsibility of each Area Supervisor. The Area Supervisor shall be responsible for identifying training needs via face to face consultation with employees, line and area management, coordinating training schedules with internal and outside instructors, supporting the refinery internal training structures on current and future training needs, supplying required training resources as needed, establishing and administrating the refinery training management system, and overseeing the Meraux Refinery Training function. The contents of this document shall be accomplished per the direction of the respective Area Supervisors who shall be responsible for any revisions or updating required for these procedures.

2 Training schedule:

- A. New Employee Orientation Training
- B. Overall plant Basic Operator Training (BOT)
 - New hires attend a 10-week Basic Operator Training course at Nunez Community College.
 - o During the 10-week BOT at Nunez, new hires attend weekly on-site plant training and exercises.
- C. On-the-job training:
 - A. Qualification: new hires receive training, must pass on-line tests at 80%, and must pass oral walkthroughs at 100%.
 - B. Certification: new hires must demonstrate skills and knowledge for the first 30-, 60-, 90-, and 120-day probation.

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New employee orientation training: New employees shall begin orientation on the first day of employment. New employee orientation training shall be accomplished in accordance with the training detailed in the Meraux Refinery's "New Employee Orientation" guidelines", EPS-0009 New Employee Orientation, shall include the following:

- a. Plant structure
- b. Operating department functions
- c. Engineering functions
- d. Technical service functions
- e. Training program guidelines
- f. Planning department functions
- g. Administrative service functions
- h. Overview of special chemicals
- i. Safety training
- j. Process Safety Management overview
- k. Environmental control
- I. Maintenance overview
- m. Work rules
- n. Energy conservation and
- Operator responsibilities

Instructors for the orientation program shall include the Nunez Community College BOT instructors, Human Resources staff members, Shift Supervisors, Operations Area Supervisors, Lab Chemists, Engineers, and Safety Department staff members.

- **Environmental, health, safety, and security training**: New operators shall receive initial environmental, health, safety, and security training during the Basic Operator Training from members of the Safety Department. Safety training shall be accomplished in accordance with the training detailed in the Meraux Refinery's "New Employee Orientation" guidelines, **EPS-0009**. In addition to regulatory training, qualified safety instructors shall conduct classroom training on the following:
 - a. Industrial injury reporting
 - b. Safety eye wear policy
 - c. Hearing protection
 - d. Respirator fit and proper use self contained breathing apparatus
 - e. Strains and sprains
 - f. Proper methods of lifting
 - g. Protective clothing
 - Fire extinguishing

Mandatory safety training required by OSHA (29 C.F.R. 1910), EPA (40 C.F.R.), and DOT (49 C.F.R.) regulatory agencies shall be provided during this safety training. For additional company specific safety procedures that shall be covered during this training refer to the Meraux Refinery Safety Procedure EPS-0009. Safety training topics include the following:

- a. Safe Work Lock-Out/Tag-Out
- b. Confined Space
- c. Hearing Protection and
- d. Respiratory Protection

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Hazwoper and **Hazcom** training shall be provided before an operator is assigned to a job. Hazmat training for all employees (except the Emergency Response Team which receives a higher level of training) is included in the Hazwoper course.

Introductory Environmental and Refinery Overview Awareness training shall provided in the Basic Operator Training for all new employees. Introductory training shall include to the following:

- a. Purpose and general nature of training material
- b. Goal of orientation
- c. Community impact
- d. Air, water, and solid waste
- e. Process units and major equipment
- f. Process hazard types and their location
- g. Fugitive emission monitoring and reporting
- h. Practices and procedures

Training shall also address individual actions needed to comply with all Environmental Protection Agency (EPA) Standards. Where appropriate, testing for environmental, health, safety, and security (EHS&S) training shall be accomplished at the end of the presented course topics included in the BOT Program Syllabus. Should the courses be delivered via computer as computer or web based training (CBT or WBT) EHS&S courses, testing shall be done at the end of the course module and the trainee shall show 80% comprehension to get course completion credit. Documentation of training shall be accomplished with the completion of a Sign-In-Sheet accompanied with a copy of graded test evaluations which shall be filed in the individuals training records.

Refresher training on Environmental, Health, Safety, and Security shall be provided to all affected employees as required by regulatory agencies and directed by the standard. In addition, company specific training on safe work practices, emergency safety procedures, and other safety standards, may occur on a per need basis i.e., revision updates due to State or Federal regulatory standard changes, Management Of Change (RFCs), and safety performance issues identified on incident investigation reports. Safety topics covered in a refresher instructor led training class may be developed from safety performance issues such as incident rate increases due to incidents and near miss incidents. Refer to the Meraux Refinery Incident Reporting Investigation Procedure SSP-0032.

- General operator training covering overall plant basics (BOT). Basics Operator Training provided by Nunez Community College (or equivalent public institution), shall include on their course syllabus a week of Environmental, Health, Safety, and Security (EHS&S Orientation), known at the Meraux Refinery as HAZWOPER Training. The training plan shall be developed between the BOT Program Director and the Meraux Refinery Training Coordinator. Authorization for revisions and updates to the training plan shall be the responsibility of the Human Resources Manager, or designee. The training plan shall include but not limited to workbooks, computerized learning modules, process simulators and emulators, equipment cutaways, and hands-on field demonstrations. BOT Trainees shall be instructed on the following:
 - a. Valves
 - b. Pumps
 - c. Electrical equipment
 - d. Instrumentation
 - e. Work order writing and handling
 - f. Safe work permits
 - g. Heating and cooling process equipment
 - h. Distillation
 - Process chemistry
 - Laboratory testing
 - k. Operator cost reduction
 - Piping and instrument diagrams and
 - m. Waste management.

Weekly BOT training progress reports for each student shall be routed to the Meraux Refinery Human Resources Manager for review.

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- **Operator on-the-job training (OJT)**: Upon successful completion of the BOT Program, employees shall be assigned to a specific work area and shall receive job specific On-The-Job-Training. They shall be supplied with available process flow diagrams, piping and instrument diagrams and operating and emergency procedures. Process Area and Unit Specific Training Manuals accompanied by learning guides and tests shall be used for operator job certification. Each Unit specific training manual shall be written using a similar standardized format and shall include the following:
 - Introduction including safety, environmental, health, and security
 - Unit process control and equipment
 - Procedures: emergency, normal operating, shutdown, startup, and temporary
 - Walkthroughs
 - Relevant checklists

Training shall be provided regarding process controls and equipment for each area and unit in the plant followed by a test on covered material. An 80% minimum score shall be achieved on each test phase before advancing to the next module. For test failure, feedback, and remediation administrative guidelines see Testing Procedure below. Job techniques that were introduced during the orientation section of this program are applied with the trainer's guidance during OJT.

- a. On-the-job training shall be conducted by the work Area Supervisor assisted by a Chief Operator or a "C" Operator on the job. The trainee shall be required to meet objectives that shall be monitored by the Area Supervisor and shift supervisors.
- b. Weekly training report forms, documenting the trainee's progress, shall be completed by the shift supervisor with copies sent to the Operations Manager and the affected Operations Area Supervisor.
- c. The trainee shall take as much responsibility for the assigned job he or she is being qualified. The chief operator and the operator working the job on-shift have the responsibility to assist the trainee in learning the job and meeting the trainee's objectives.
- d. If the probationary period was not successfully completed, the operator's records and evaluation reports shall be reviewed by the Area Supervisor who shall determine what course of action is required for the operator in training.
- **Testing**. Testing is required to verify training effectiveness and to evaluate an employee's qualifications for specific jobs. A variety of testing instruments may be used for measuring trainee's knowledge, skills, and abilities. This may include but is not limited to written and oral tests, hands-on demonstrations, and walkthroughs. Some of these tests may be administered with the aid of audio, visual, and computer equipment.
 - a. To assure the trainee's readiness to take over the job, during the on-the-job training period, the Operations Area Supervisor shall test the trainee qualifying for a specific job at each of level of evaluations, which are:
 - Tests for each objective in the training guide
 - Test for each module of training, and
 - Test for the position (composite knowledge test and walk-through).
 - b. Should any supervisor feel that the trainee isn't ready to take total responsibility for a job after the onthe-job training period, he or she shall document and discuss possible extension of the on-the-job training period.
 - c. In the units, Shift Supervisor, the Operator on shift, and the Chief Operator shall train the Unit Operators. The Chief and Board Operators and the Line 3 operators will be trained by the Operator on shift and the Shift Supervisor.
 - d. The progress of the trainee shall be watched closely at this point to determine continuation of training or disqualification.
 - e. The trainee shall take over the job after he has successfully completed on-the-job training and scored a minimum of 80% on all testing and 100% on all walkthroughs.

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 f. Skill testing for on-the-job training, which may be in the form of a "walkthrough", shall be accomplished and the trainee shall show 100% skill ability and comprehension on this evaluation level. g. Documentation of training shall be accomplished with the completion of all three levels of evaluation requirements. h. Evidentiary training documentation not retrievable by the training department via computer access shall be sent through inter-company mail or in Adobe PDF format via email. Evidentiary records may include but not limited to: Hard copies of walk-through checksheets. If multiple employees need to separate. The Operator Certification Form The Probationary Evaluation (30 Days, 60 Days, 90 Days, and 120 Days) Form every 30 days i. The Records Department shall credit, scan, file, and store each training record in the company's Learning Management System and at Central Files secured storage for each individual employee. j. The following is a summary of the Meraux Refinery testing policy for operator job qualification: A minimum score of 80% is required to pass all three levels of evaluation on the same job position. The employee shall be allowed three strikes (fails) per job position he/she is attempting to qualify. If an employee does not pass the testing requirements for all three levels on the first and second attempt, remediation and re-testing shall be scheduled. The student, foreman, and trainer shall reach agreement on a date and time for the remediation and re-test. Depending on the amount of training material to be covered and the complexity of the Operating Area or Unit, the remediation retesting time frames shall be set and standardized accordingly. Employees who do not pass the testing requirements for the Operating Area or Unit, the remediation retesting time frames shall be set and standardized accordingly. All testing instruments shall be maintained in the Train
Certification / Performance Evaluation. When a trainee satisfactorily completes the above
training and has successfully completed the appropriate written and oral exams, the Area Supervisor shall sign the "Probationary Portion" of the certification form. The Shift Supervisor shall closely monitor the trainee throughout the probationary period of up to 120 days. At monthly intervals during the probationary period, the trainee shall be evaluated by the Shift Foreman and Area Supervisor to determine whether the desired results of training were obtained. Evaluation form shall be completed and sent to the Area Supervisor. Unfavorable evaluations may require a review of the trainee's potential by the Area Supervisor.

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		After the probationary period has been satisfactorily completed, the Area Supervisor shall sign the "Probationary Period Satisfactorily Completed section of the certification form and send, notify, or communicate to the Records Department certification completion for recordkeeping purpose. The signature fully certifies the operator for the specific position for which he or she was trained. In the near future, electronic web signatures using online collaborative tools shall be considered for use. The trainee may be tested by a shift foreman at any time after taking over the job. If for any reason a shift foreman feels that the trainee should be disqualified, that shift foreman shall schedule a meeting with the Area Supervisor to examine any reasons for disqualification or additional training.	
	9	Operator Refresher Training. Operator Refresher training is required for all operators at least every 3 years. Operators shall receive generic and unit-specific training on operating procedures. Written and/or oral testing for Operator training shall be accomplished at the end of the class. Should the course be delivered via computer as a computer or web based training (CBT or WBT) course, it shall be done at the end of the course module and the trainee shall show 80% comprehension. Refresher training frequency was established as every three years based on a survey of all active operators. This survey conclusively indicated that the three year cycle would be adequate for refresher training. A copy of this survey with accumulated results is on file. As part of the refresher training, Safety Training is an integral part. Process Safety Information is included in this refresher safety training. Documentation of training shall be accomplished with the completion of a Sign-In-Sheet accompanied with copy of graded test evaluations which shall be filed in the individuals training records.	
	10	Continued on-the-job performance testing . Operators shall be continually evaluated for satisfactory performance after their training period by their immediate supervisors. If an operator requires more training or requires other actions to improve their performance, the shift supervisor shall utilize the proper employee relations procedures to accomplish these requirements. Operators who change operating units or areas shall be trained and certified per paragraphs (8.0) and (9.0) above for the new unit or area. Failure to qualify will result in going to the Shift Breaker position. See Article IX Section 5 of the new contract.	
	11	Documentation . All training documentation shall be sent to the Area Supervisors and forwarded to the Record Department to be filed and maintained.	
	12	Exceptions . Any deviation from the Operator Training Program shall be approved by the Refinery Human Resources Manager, the affected Area Supervisors, the Operations Manager and the Refinery Manager. Justification for deviations shall be documented and maintained in the training files.	
Approved by	Carl Zornes, General Services Manager		
Approved by	Jeff Wa	armann, Refinery Manager	