

FFPO Procedure Blue Sheet Form

A. Procedure Title (list manual, procedure series, or specific procedure #)

SPR Accident Prevention Manual

Section 4 Rights and Responsibilities Under OSHA

B. Procedure Name/series type (i.e., operations, maintenance, etc.) E S & H

C. Check (✓) one of the following:

1. Procedure(s) accepted “as is” with terminology replaced as denoted in the Site Procedures Approved Terminology Replacement List for the FFPO SPR M&O contract.

2. In addition to the changes in approved terminology for the FFPO SPR M&O contract, improvements to the procedure are warranted:

Category 1 Finding (Resolution prior to contract start)

Category 2 Finding (Resolution within 90 days of contract start)

Category 3 Finding (Resolution to the Issues Management program)

D. Comments/Notes:

E. Forward a copy of this form to the FFPO Director, Business Management for revision tracking.

Signed

FFPO Reviewer Signature

02/25/14

Date

Steve Mahan

FFPO Reviewer Print Name



Site Procedures Approved Terminology Replacement List

Approved Terminology Replacements	
Terminology to be Replaced	Substituted Verbiage
AGSC	M&O Contractor or MOC
Boeing	M&O Contractor or MOC
Construction Management Services or CMS contractor	M&O Contractor or MOC
DynMcDermott or DM or Company	M&O Contractor or MOC
DM Contract No.	M&O Contract
Organizational Changes	
William Gibson or "Hoot"	DOE Project Manager or DOE PM
Robert (Bob) McGough or DM Project Manager or CEO	MOC Project Manager or MOC PM
Randy Sutton (Acting) or DM General Counsel	MOC General Counsel or MOC GC
Scott Landry or DM APM, O&M and COO	MOC APM, O&M
APM, Cavern Integrity	Senior Director, Cavern Integrity
Colleen Yates or DM APM, Business Operations and CFO	MOC APM, Business Operations and CFO
APM, Security and Emergency Preparedness or Director, Security and Emergency Preparedness Division	Senior Director, Security & Emergency Preparedness
Henry Schmidt, Jordan Jones, or Duane Johnson	Senior Director, Security & Emergency Preparedness
Leslie Williams or APM, Data Systems or Data Systems Director	Senior Director, Data Systems
William Bozzo or DM APM, ES&H	MOC APM, ES&H
Walt Newcomb or DM Director, Energy & Sustainability	Director, Environmental
J.P. Martinez or DM APM, Engineering	MOC APM, Engineering

ACRONYMS

AGSC	ASRC Gulf States Constructors
APM	Assistant Project Manager
ASRC	Arctic Slope Regional Corporation
CAS	Contractor Assurance System
CFO	Chief Financial Officer
COO	Chief Operating Officer
ES&H	Environment, Safety, and Health
GC	General Counsel
M&O	Management and Operating
MOC	Management and Operating Contractor
O&M	Operations and Maintenance
PM	Project Manager

4. RIGHTS AND RESPONSIBILITIES UNDER OSHA

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4.1. INTRODUCTION

A safe, healthy workplace results from the diligent combined efforts of management, employees, contractors, and subcontractors. Under OSHA regulations, both employers and employees have rights and responsibilities that are critical to the overall success of the Safety and Health Program. By participation in the VPP, DM assures that these rights apply to all contractor/subcontractor employees. An overview of these rights and responsibilities is provided in the tables that follow.

4.2. TABLES: RIGHTS AND RESPONSIBILITIES UNDER OSHA

TABLE 4.1. EMPLOYER RESPONSIBILITIES UNDER OSHA	
a.	Provide a work environment free from recognized hazards that could cause harm to our employees.
b.	Strive to comply with all OSHA standards, rules, and regulations.
c.	Inform all employees of the company about OSHA and its standards.
d.	Routinely examine workplace conditions for compliance with OSHA standards.
e.	Ensure all employees are equipped with safe tools and equipment for performing their jobs in a safe manner, and ensure that all tools and equipment are properly maintained.
f.	Provide affected employees information on the existence, location, and availability of medical records and records of their exposure to toxic substances and harmful physical agents upon their initial assignment and at least annually thereafter.
g.	Identify potential hazards through the use of color codes, labels, signs, or posters.
h.	Establish or update operating procedures and ensure that all updated procedures are communicated to all employees.
i.	When required by OSHA, provide medical examinations for employees.
j.	Immediately (within 8 hrs.) report to nearest OSHA office all accidents resulting in fatalities or accidents that result in the hospitalization of 3 or more employees as a result of work-related incidents.
k.	Maintain OSHA-required records of work-related injuries and illnesses utilizing the OSHA Form 300A Summary, Form 300 Log, and DOE Form 5484.3 in lieu of OSHA Form 301 Injury and Illness incident Report. These records are to be maintained for 5 years.
l.	Post in a conspicuous location the previous calendar year's summary of occupational injuries and illnesses (OSHA No. 300A Summary only) from February 1 through April 30 of every year.
m.	Post the OSHA No. 2203 poster entitled "Job Safety and Health Protection" to inform employees of their responsibilities and rights in the area of job safety.
n.	Provide all employees, former employees, and their representative's access to the OSHA No. 300 Log and 300A Summary of Occupational Injuries and Illnesses when requested.
o.	Never discriminate against an employee when he/she properly exercises his/her rights under the OSHA Act.
p.	Post the citation of any violations at or near the worksite for a period of 3 days or until the violation is corrected, whichever is later.
q.	Correct all violations noted by OSHA within the specified timeframe.

TABLE 4.2. EMPLOYEE RESPONSIBILITIES UNDER OSHA

- a. Comply with all applicable OSHA standards at all times.
- b. Read the OSHA No. 2203 poster entitled "Job Safety and Health Protection."
- c. Follow all safety policies set forth in the Accident Prevention Manual.
- d. Wear all personal protective equipment (PPE) and/or clothing required for the job that you are performing.
- e. Immediately report all safety violations, concerns, or potential hazards to your supervisor.
- f. Immediately report all work-related injuries, illnesses, near misses, and non-job related illnesses to **the control room** and your supervisor.

TABLE 4.3. EMPLOYER RIGHTS UNDER OSHA

- a. Request off-site consultation and advice from nearest OSHA office.
- b. Within 15 days of receipt of an OSHA violation, file a written notice of contest if applicable.
- c. Apply for a temporary variance from a standard when unable to comply due to the unavailability of materials, equipment, or personnel needed to enforce compliance within a specified period of time.
- d. Apply for a permanent variance from a standard if employer can prove that employer's work practices provide employee protection as effective as that required by the standard.
- e. Become active in developing safety and health standards through participation in advisory committees sponsored by OSHA or other nationally recognized organizations.
- g. Request in writing from the National Institute for Occupational Safety and Health (NIOSH) information regarding substances in the workplace, and whether they have potential toxic effects in the concentrations used.

TABLE 4.3. EMPLOYER RIGHTS UNDER OSHA

- a. Every employee has the right, without discrimination, to demand safety and health while on the job. DM Petroleum will not discriminate against any employee who exercises his/her rights under OSHA. Employees who feel they have been discriminated against for exercising safety and health rights may contact their nearest OSHA office within 30 days of the alleged discrimination. An investigation will be initiated by OSHA.
- b. Additional employee rights include:
- c. Request review of all OSHA standards, rules, regulations, and requirements that the employer should have available at the workplace.
- d. Request information pertaining to safety and health hazards in the workplace, precautions that may be taken, procedures to be followed if an employee is involved in an accident or is exposed to toxic substances, and be provided with training on company safety and health policies and procedures.
- e. Having access to relevant employee exposure and medical records.
- f. Request that an OSHA inspection be conducted if hazardous conditions or violations are believed to exist in the workplace.
- g. Request that their names be withheld from their employer when filing a written complaint with OSHA.
- h. Request information regarding OSHA's actions concerning a complaint.
- i. Request to review all records pertaining to any monitoring or measuring of hazardous materials within the workplace.
- j. Review or have their authorized representative review the OSHA No. 300 Log and 300A Summary of Occupational Injuries and Illnesses.
- k. Following an OSHA inspection, request a closing discussion with the OSHA compliance officer.

- i. Submit a written request to NIOSH for information pertaining to any substance in the workplace and its potential toxic effect when used in specific concentrations. When a request of this sort is made, the employee may request that his/her name be withheld from his/her employer.
- m. Regarding violations due to an OSHA inspection, an employee may write an objection to "the time frame for corrective actions to be taken," and submit their objection to their OSHA director within 15 days of the receipt of citation.
- n. Receive notification from employer of application for a variance and testify at a variance hearing and appeal the final decision.
- h. Submit information or comments to OSHA on the issuance, modification, or revocation of OSHA standards and request a public hearing.