
CHAPTER 8: EMPLOYEE PARTICIPATION

Section 450-8.016(B)(2) of County Ordinance 98-48 requires stationary sources to ensure that employees and their representatives participate in the development of the written human factors program. The intent of this chapter is to first identify steps that sources must take to ensure that employees are provided an opportunity to participate in the development of the written human factors program. The chapter will then summarize opportunities (explicitly identified in Chapters 3 through 7 of the Human Factors Guidance) for employees and their representatives to participate in implementation of the written human factors program. A majority of the participation outlined below is already specified in existing regulation/legislation. Therefore, it is not the intent of this chapter to reiterate those existing requirements (e.g., to address Section 450-8.016(A)(3)), but rather to discuss inclusion of the human factors program into the existing employee participation structure. Stationary sources electing to adopt an alternative method to the one presented in this chapter must consult with CCHS representatives.

8.1 DEVELOPMENT OF THE WRITTEN HUMAN FACTORS PROGRAM

Employees and their representatives must participate in the development of the written human factors program. This does not necessarily mean that employees and their representatives be responsible for actually writing the programs, but that, in general, the following occurs:

- Employees and their representatives must be provided the opportunity to submit input into the initial development of the program (e.g., brainstorming sessions on how operating procedures should be reviewed to ensure that latent conditions are addressed)
- Employees and their representatives must be provided the opportunity to review the program and submit comments within a reasonable time frame
- Stationary source representatives must address all written comments submitted either accepting the comment and offering a revision, or denying the comment and providing justification for the denial within a reasonable time frame.

Chapters 3 through 8 strongly advocate the use of checklists (Attachments A and B) to assist stationary source representatives in identifying and resolving existing latent conditions as part of a PHA or in response to an incident. These checklists should be customized for each stationary source and even then should only be considered as guidance. Employees and their representatives should be provided the opportunity to participate in the customization of the checklists.

8.2 IMPLEMENTATION OF THE WRITTEN HUMAN FACTORS PROGRAM

Once the written human factors program is developed, employees and their representatives should be involved in implementing the program. Sections 8.2.1 through 8.2.5 (taken from Chapters 3 through 7) summarize specific opportunities for employee participation in the implementation of the human factors program. This list should not be considered an exhaustive list (i.e., stationary sources should expand upon this list and identify site-specific programs). In addition to the specific opportunities for employee involvement described in Sections 8.2.1 through 8.2.5, stationary sources must ensure that, in general, the following occurs):

- Employees and their representatives review the written human factors program on an established frequency and ensure that any necessary revisions are incorporated
- Employees and their representatives understand, and participate as appropriate, in finalizing the written human factors program following the review
- Employees and their representatives participate in maintaining the written human factors program current and accurate (i.e., the stationary source may identify certain types of changes that would require that the program be updated as soon as possible as opposed to waiting until the usual (e.g., annual) review

8.2.1 CHAPTER 3: EVALUATION AND MINIMIZATION OF LATENT CONDITIONS

Chapter 3 advocates the use of a “Latent Conditions Checklist” to assist employees in identifying existing latent conditions at their source that could contribute to or exacerbate an active failure. Employees should participate in customizing/developing the checklist to reflect the stationary source. Chapters 4 through 8 then advocate application of the checklist as appropriate.

8.2.2 CHAPTER 4: PROCESS HAZARD ANALYSIS

Chapter 4 discusses various approaches for including human factors in process hazard analyses (PHA’s). Regardless of approach used, employees must participate in the PHA and participate in evaluating the existence of latent conditions and consequences of active failures.

8.2.3 CHAPTER 5: INCIDENT INVESTIGATION

Chapter 5 discussed the consideration of human factors in incident investigations. Employees and their representatives should be included in the incident investigation team as described in Chapter 5.

8.2.4 CHAPTER 6: OPERATING PROCEDURES

Chapter 6 advocates objectively reviewing existing procedures to identify existing latent conditions that may cause an active failure. This chapter also discusses developing, reviewing, finalizing, and maintaining procedures. Appropriate employees must participate in all of these phases, including identification of latent conditions existing within the operating procedures that could cause or exacerbate an active failure.

8.2.5 CHAPTER 7: MANAGEMENT OF CHANGE FOR ORGANIZATIONAL CHANGES

Employees and their representatives shall be consulted in the management of change for organizational changes. Chapter 7 specifically discusses the formulation of a “change team” or “MOC team” made up of employees, as appropriate, from engineering, maintenance, operations, and safety and health. This chapter also advocates the use of checklists to augment brainstorming sessions of the “change team” or “MOC team” during the review.

Stationary sources may find it beneficial to create a human factors committee to assist in the initial development and in the continuous implementation of the human factors program. Considerations in creating a human factors committee include, but are not limited to: team composition; preparation/participation time for employees and their representatives; meeting schedules to accommodate each committee member’s needs (particularly important for shift workers); and training for committee members (See Chapter 9).

In conclusion, stationary sources must ensure that employees and their representatives participate in the development of the written human factors program. Stationary sources should ensure that employees and their representatives participate in the implementation of the written human factors program including reviewing, finalizing, and maintaining the program. Stationary sources may elect to revise the established structure for employee participation to ensure that it includes the human factors program.