



CORRECTIVE ACTIONS

#19000-016

Issue Date: January 2018

Review Date: Jan. 2021

Area: SCEP

Document Owner: Environment, Health and Safety Manager

Document Contact: Safety and Hygiene Advisor

Table of Contents

SCOPE AND PURPOSE..... 2

ROLES AND RESPONSIBILITIES..... 2

ACTION PLAN IDENTIFICATION AND DEVELOPMENT PROCESS..... 3

TYPES OF ACTION PLANS..... 3

CORRECTIVE/PREVENTATIVE ACTION VERIFICATION PROCESS..... 5

DEVIATION PROCESS (IF APPLICABLE)..... 5

REVIEW/REVISION..... 6

REFERENCE DOCUMENTATION..... 6

SCOPE AND PURPOSE

This document applies to all activities at the St. Clair Ethanol facility that may result in an action plan development.

The purpose of the Corrective Actions Safe Work Practice is to define the process for identifying, developing, recording, assigning, completing, and evaluating the effectiveness of corrective actions at the St. Clair Ethanol facility, as well as defining the differing types of action plans and appropriate use.

ROLES AND RESPONSIBILITIES

Event Owner is responsible to -

- Review the event and accept ownership within 3 business days
- Refine initial data and seek out additional information to ensure the event report contains adequate information to support investigation/follow-up activities
- Analyze to determine actual and potential consequence levels, level of investigation (where applicable) and final ownership
- Review and update an event report as required (utilizing the support of Subject Matter Experts (SME's) where applicable, and any/all applicable standards
- Oversee the workflow of the event – including action plan entry and assignment
- Review corrective/preventative action types to ensure they address root cause prior to entry
- Risk rank corrective/preventative actions utilizing the Suncor risk matrix
- Prioritize general action items
- Document the need for a formal effectiveness review, define responsible parties and assign appropriate timing

Responsible Person (required for corrective/preventative action plan types) is accountable for -

- Overseeing scope development, timeline extensions, and closure
- Verifying ownership of the Corrective Actions is properly assigned
- Assigning resources and communicating responsibilities to support execution of the Corrective Action
- Monitoring the execution and completion of the Corrective Action
- Verifying effectiveness of the Corrective Action
- Closing the Corrective Action

NOTE: The “Responsible Person” cannot fulfil the role of “assigned to” role and should not fulfil the “owner role”

Action Owner (required for all action plan types) is responsible for -

- Verifying the “assigned to” role is appropriate
- Working with the responsible person (where assigned) to ensure adequate resources are available
- Conducting regular progress checks to ensure the action item completion date remains appropriate and adjust as required
- Review documentation and attachments provided by the “assigned to” ahead of action item closure to for adequacy/auditability

Assigned to (required for all action item types) is responsible to -

- Complete the requirements outlined in the action description
- Attach sufficient detail to support closure
- Communicate and issues or point of clarity with the action item owner

ACTION PLAN IDENTIFICATION AND DEVELOPMENT PROCESS

Sources of Action Plans –

Sources (or **events**) which may generate action plans at the St. Clair Ethanol facility include, but are not limited to

- Joint Health and Safety Committee (JHSC) recommendations
- Emergency Drill Debriefs
- Incidents investigation
- Hazard Identification
- Audit and Assessment Activities (Observation Based Safety (OBS) submissions, Industrial Hygiene Sampling Events, JHSC inspection findings, internal audits (i.e. fuels quality), external audits, etc.)
- Risk assessment activities (Process Hazard Analysis (PHA), HAZOP, risk registry, etc.)

The Event Initiator is responsible to identify that one or more of the activities above occurred and generates an event in Enablon per the process described in “Enablon – Initiator”.

The Event Owner is responsible to identify if an action plan is required based on event types/risk, the type of action plan to be developed, the resources required to support action plan development (i.e. investigation, JHSC consultation, etc.) and record actions and associated roles into the Enablon event (assign responsible person, owner, assigned to as appropriate).

TYPES OF ACTION PLANS

The type of action plan generated will depend on the source event type and associated risk.

Types of action plans include –

Corrective/Preventive – An Action intended to eliminate the occurrence or reoccurrence of an undesirable situation. Typically these actions arise from Incidents, Audits and Hazard Analysis.

General Action – Any action which is not Corrective/Preventive by definition. Does not require a responsible person to be assigned – just an owner and assigned to.

Interim Action – Interim solution until a permanent or more effective control can be put into effect.

Learning Action – An action which requires the development of a detailed training package in consultation with the central learning team.

Given that corrective/preventative action plans are developed on a risk basis, not all of the source events listed will require formal corrective/preventative action plan development.

Corrective/preventative action plans are **REQUIRED** for all source events that result in any of the following

- Tier 2 LOPC
- Potential consequence of C5 or greater
- Actual consequence of C4 or greater

It is important to note that not all source events are subject to consequence ranking, and it is at the discretion of the event owner to apply consequence rankings in the event for which an action plan is requested or proposed.

Corrective/preventative action plans are **RECOMMENDED** for all source events that result in any of the following –

- Planned activities that result in the identification of a systemic issue (i.e. missing a key component of a system)
- A recurring low consequence event that has been reviewed by the leadership team and deemed to be of appropriate risk to be subject to a Level 2 Investigation (see Incident Management Standard)

The Event Owner is responsible to ensure a corrective/preventative action plans are developed and approved prior to entry into Enablon and appropriate responsible persons and owners are assigned.

Please see the table below, which outlines appropriate responsible/owner roles based on the risk rank of the corrective/preventative action item.

	Responsible Person	Owner
1+	ELT Member	VP Level or Higher
1	VP Level or Higher	Dir/GM Level or Higher
2	Dir/GM Level or Higher	Manager Level or Higher
3	Manager Level or Higher	Manager Level or Higher
4	Manager Level or Higher	Employee or Higher

Entry will occur following the details of the standard, following the work flow activities outlines in the training package “Enablon – Adding an Action Plan”.

General and learning action plans may be utilized for all other events for which an action plan supports risk reduction and/or process improvement at the site – but does not meet the definition and/or requirements to be classified as a corrective/preventative action plan.

General action plans must be assigned a priority of high, medium and low

High priority general actions include those that address –

- A serious injury/fatality precursor (SIFp) or Life Saving Rule (LSR)
- And/or are time sensitive in nature
- And/or affect more than one stakeholder group, require a substantial amount of time from dedicated resources

Medium priority actions include those that –

- Do not include a SIFp, LSR
- And/or require dedicated resources to be assigned for a manageable time period
- And/or must be completed within a calendar year of initiation

Low priority actions are those which –

- Do not include SIFp or LSR
- Do not require dedicated resources (may be easily completed within the course of normal work scope)
- And/or include an extended timeframe for completion

Event Owner must accept or re-assign the action within 3 working days to prevent undue delay.

Action Owner is responsible to track actions to prevent generating an overdue status and review documentation and attachments provided by the “assigned to” ahead of action item closure to for adequacy/auditability. If documentation is not adequate or action did not meet intent, the Action Owner is responsible to reject closure and communicate deficiencies to the assigned party to support completion.

CORRECTIVE/PREVENTATIVE ACTION VERIFICATION PROCESS

Following the closure of an action item it is the Action Owners responsibility to identify if an Effectiveness Review is required.

The Effectiveness Review process will be applied (at a minimum) to corrective actions at the St. Clair Ethanol facility with a risk rank of II or greater, and is strongly recommended for risk rank III and medium to high priority general action items.

Following the closure of an action item – the Action Owner will review corrective actions to determine if an Effectiveness Review is required.

If required, the Action Owner will assign an Effectiveness Reviewer (cannot be the action assigned to or owner) and must be of the equivalent or greater authority level of the action items owner.

The Action Owner will include the following minimum instructions in the Effectiveness Review scope –

- Confirm whether or not any new or improved processes have been sustained in the field
- Confirm whether or not any similar events have occurred since the implementation of the affected action plan

The Effectiveness Reviewer will document the review and associated findings into Enablon – and generate action plans to address any deficiencies identified.

DEVIATION PROCESS (IF APPLICABLE)

Opportunities for improvement are not subject to the corrective action standard and workflow process.

Facility equipment repairs will be captured via work order in MAPCON.

Management of Change Actions are not currently included in the scope of this standard and are to be addressed via the St. Clair Ethanol Management of Change Standard.



REVIEW/REVISION

A review of this document will occur following a regulatory change or at a minimum of every 5 years utilizing the "EH&S SOP Review and Sign-Off Sheet" \\file128\stclair\Operations\Employee Resource Centre\Procedures\SOP's & OGS's. The Document Control Administrator will notify the Document Contact - who will steward the review and will engage the Operation Coordinator to support the review from an operations and maintenance perspective. Other events which trigger review (MOC, Incident Findings) include processes which will initiate review.

REFERENCE DOCUMENTATION

- 19000-006 Joint Health and Safety Term of Reference
- 19000-012 Incident Management
- 19000-037 Observation Based Safety
- 20000-005 Emergency Response Procedure

Note: EH&S SOP Review and Sign-off Sheet to be completed and submitted with updated document

END OF PROCEDURE

REVISIONS			
No.	Date (mm/dd/yyyy)	Author	Description
1	01/31/2018	L. Nauta	Created

APPENDIX A

Incident Event, Investigation and Corrective Action Assignment

At approximately 0900 hrs the centrifuge bowl lowered to grade by maintenance. The hoist trolley was initially extended to the full travel to the south by maintenance.

Two contract workers arrive on second deck, with instructions to clean the centrifuge lid which requires use of monorail crane. Worker 1 is on the control of crane on the east side of lid, worker 2 is doing the rigging on the west side of the lid.

When worker 1 activates control for crane, almost immediately the rod connecting the crane to the cable festoon trolley fell from the track. The tie rod with a metal clamp on the end with the festoon trailing swung north to south past worker 1 at head height. Remainder of festoon continued to fall and when the metal clamp swung back to the north it struck the saw horse.

Using the dropped objects calculator it is determined that the object dropped 15 ft. and weighed 4 pounds – resulting in a potential major injury (SIFp HS5).

This is a level II event and the Director of Ethanol Operations is assigned as the Incident Owner per 19000-012 Incident Management Standard and the event is work flowed through Enablon.

Following the formal Root Cause Analysis (RCA) investigation activities, the root cause is determined to be the 2009 installation of an "under-designed/under-engineered" festoon track to replace existing track due to numerous issues. No documentation or risk assessment was conducted on the new track.

A likelihood of L2 is assigned following the investigation – resulting in an overall risk rank of III for the incident.

One of the corrective actions proposed by the investigation team is defined as “follow the Management of Change process - conduct a formal engineering redesign for the cable festoon”.

The Director of Ethanol Operations will enter the corrective action into Enablon.

The corrective action has an overall risk rank of III – similar to the incident itself.

The Action Item Owner assigned is the Technical Manager (risk rank of III) for the site.

The Responsible Person assigned may be another Manager, or may be the Director of Ethanol Operations.

The Assigned To is a Professional Engineer from the Sarnia Refinery who has agreed to conduct the actual system review and design.