



**American
Fuel & Petrochemical
Manufacturers**

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1800 M Street, NW
Suite 900 North
Washington, DC
20036

Chair Rena Moran
House Ways & Means Committee
Minnesota House of Representatives
449 State Office Building
525 Park Street
Saint Paul, MN 55103

202.457.0480 office
202.457.0486 fax
afpm.org

Madam Chair:

On behalf of the American Fuel & Petrochemical Manufacturers (AFPM), thank you for the opportunity to submit comments regarding the House File 4177 (HF4177), the Jobs and Economic Development Omnibus bill, specifically in opposition to Article 7.

AFPM is a trade association representing more than 300 high-tech American manufacturers of virtually the entire U.S. supply of gasoline, diesel, jet fuel, other fuels and home heating oil, as well as petrochemicals used as the building blocks for vital products in daily life. AFPM membership extends throughout the country and includes members in the state of Minnesota.

There is nothing more important to the fuel and petrochemical industries than safety. Our industries are never satisfied with the status quo, and constantly strive to improve upon their safety records, which already rank in the top ten percent of more than 500 manufacturing industries.

Training our employees, at every level, is paramount to what we do. When working at a high hazard facility, the most important thing is to make sure that they have process safety knowledge and training to identify and understand their facility hazards. The safest sites have a *strong culture of safety from the top down* and provide tools to their employees to drive consistent repeatable results to prevent loss of containment or chemical releases.

Members of AFPM strive for zero injuries and incidents. Our focus is on both process safety and occupational safety – applying good operating, engineering, and maintenance practices, and ensuring the safety of workers through proper techniques, adherence to practices and continuous training.

Members of AFPM participate in our Advancing Process Safety Programs, which promote collaboration across industries to continuously improve process safety through data collection and opportunities to share experiences and knowledge.

AFPM's Advancing Process Safety Program consists of several parts:

- **Walk the Line:** Employee human performance program directed at operators that provides a toolbox of training materials and good practices to prevent common incidents caused by common operational discipline errors.
- **The Process Safety Regional Networks:** Six regional information sharing networks that allow process safety professionals to improve overall safety performance through collaboration at the site and association level.

- The Process Safety Site Assessment Program: Independent third-party assessments that help facilities prevent process safety events through rigorous evaluation of written programs and operations.
- Hazard Identification/Practice Sharing Group: Develops Hazard Identification and Practice Share documents for broad industry distribution that address common industry hazards and good industry practices.
- The Mechanical Integrity Group: Develops resources to help members improve mechanical integrity programs, a key process safety program element.
- The Human Reliability Group: Develops information and tools to improve human performance in operations that aid in reducing the likelihood and consequences of human errors.
- Industry Learning & Outreach Group: Industry data analysis that identifies opportunities for improvement for APS and conducts monthly industry webinars.

These programs, along with our occupational safety programs are geared toward preventing injuries in our facilities. Through incident data collection, we can identify opportunities for industrywide improvement and build tools to address these issues that are then shared throughout the industries. Combined, these programs are designed to touch every employee in our industry.

AFPM members recruit and train their employees from various sources, including apprenticeship programs, Vocational and College technical programs and a pool of experienced employees and legacy recruits. But each refinery is different, they differ in size, refining capacity, feedstocks and outputs. The key factor that makes each refinery safe are the daily training programs that happen inside the fence line.

Nothing in Article 7 will change these facts, and we hope that you will oppose the refining section as unnecessary. Our safety programs are ingrained in the culture of AFPM and our member companies. It is only through a culture of safety, from the C-Suite to the newest employees in every facility, that we can maintain a safety record that consistently ranks among the best of American industry.

Sincerely,



Don Thoren
Vice President
State & Local Outreach