

RETA Chapter Meeting Schedule

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MINNESOTA

NORTHERN PLAINS
3rd Thursday; 6 pm

N/S CAROLINA

CAROLINAS
1st Thursday; time varies
No meeting in June, July or August

OREGON

WILL H. KNOX
1st Monday

OKLAHOMA

TULSA
2nd Tuesday; 6:30 pm

PENNSYLVANIA

NORTHEASTERN (NEPA)
2nd Thursday; 6 pm

SOUTHEASTERN (SEPA)
2nd Tuesday; 6:30 pm
No meeting in June, July or August

PHILADELPHIA
Not scheduled

TEXAS

HIGH PLAINS
3rd Tuesday; 7 pm

DALLAS/FT. WORTH
3rd Thursday; 7 pm

HOUSTON
4th Thursday; 6:30 pm
No meeting in July, November or December

WASHINGTON

CONNELL
Not scheduled

TRI CITIES
Not scheduled

YAKIMA
Not scheduled

PUGET SOUND
2nd Wednesday; 6 pm

WISCONSIN

MADISON
2nd Wednesday; 6 pm
No meeting in June, July or August

MILWAUKEE
2nd Thursday; 6 pm
No meeting in June, July or August

Check out the Chapter News section of the RETA website for additional information on Chapter events and activities: www.reta.com

PSM/RMP Compliance

EMPLOYEE PARTICIPATION — ARE YOUR OPERATORS INVOLVED?

Jeanna Emmons, SCS Tracer Environmental

Probably the shortest, and what appears to be the most unassuming, section of Process Safety Management, but maybe one of the most important, with respect to providing a foundation for your program, is Employee Participation.

In accordance with the following regulations, employers must have a written Employee Participation program:

- OSHA 29 CFR 1910.119 (c), Process Safety Management (PSM), Employee Participation, and
- EPA 40 CFR Part 68.83, Risk Management Program, Employee Participation.

Both regulations require the following in regards to an Employee Participation program:

- The owner or operator shall develop a written plan of action regarding the implementation of the employee participation required by this section [§1910.119(c)(1) and §68.83(a)].
- The owner or operator shall consult with employees and their representatives on the **conduct and development of Process Hazard Analyses and on the development of the elements of process safety management** [§1910.119(c)(2) and §68.83(b)].
- The owner or operator shall provide to employees and their representatives access to PHAs and to all other information required to be developed under this rule (without regard to possible trade secret status of such information) [§1910.119(c)(3) and §68.83(c)].

The important part of this section is that you as an employer need to be sure that you include selected employees **on the conduct and development of Process Hazard Analyses (PHA) and on the development of the elements of process safety management.** First, let's cover inclusion of employees in

the conduct and development of the PHA. Not only are you required under this section to ensure employees are involved in the PHA, but even under the PHA section, it states, that *the team shall include at least one operating employee who has experience and knowledge specific to the process being evaluated* [§1919.119(e)(4) and §68.67(d)] and that recommendations are made *available to operating, maintenance and any other persons whose work assignments are in the facility and who are affected by the recommendations or actions* [§1919.119(e)(5) and §68.67(e)].

As we go through the PSM and RMP criteria, it can be seen that all of the sections are intertwined with each other, making Employee Participation the base of your program. Refer to Figure 1 (next page). Note that for the remainder of this article, we will reference PSM; however, note that ammonia refrigeration facilities applicable to PSM are also applicable to the RMP and the criteria goes hand-in-hand.

Continuing on with the rest of the requirement, *development of the elements of process safety management...*

Per §1910.119(f)(2), *operating procedures shall be readily accessible to employees who work in or maintain a process.* In addition, it is required in the Operating Procedures section of PSM (§1919.119(f)(1)(i)(D)) *that the assignment of shutdown responsibility to qualified operators is documented for emergency shutdown.* Intertwine this with Employee Participation requirements, and you better be sure you have operator input into the development and ongoing integrity of your system's operating procedures.

Per §1910.119(j)(3), *the employer shall train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its*

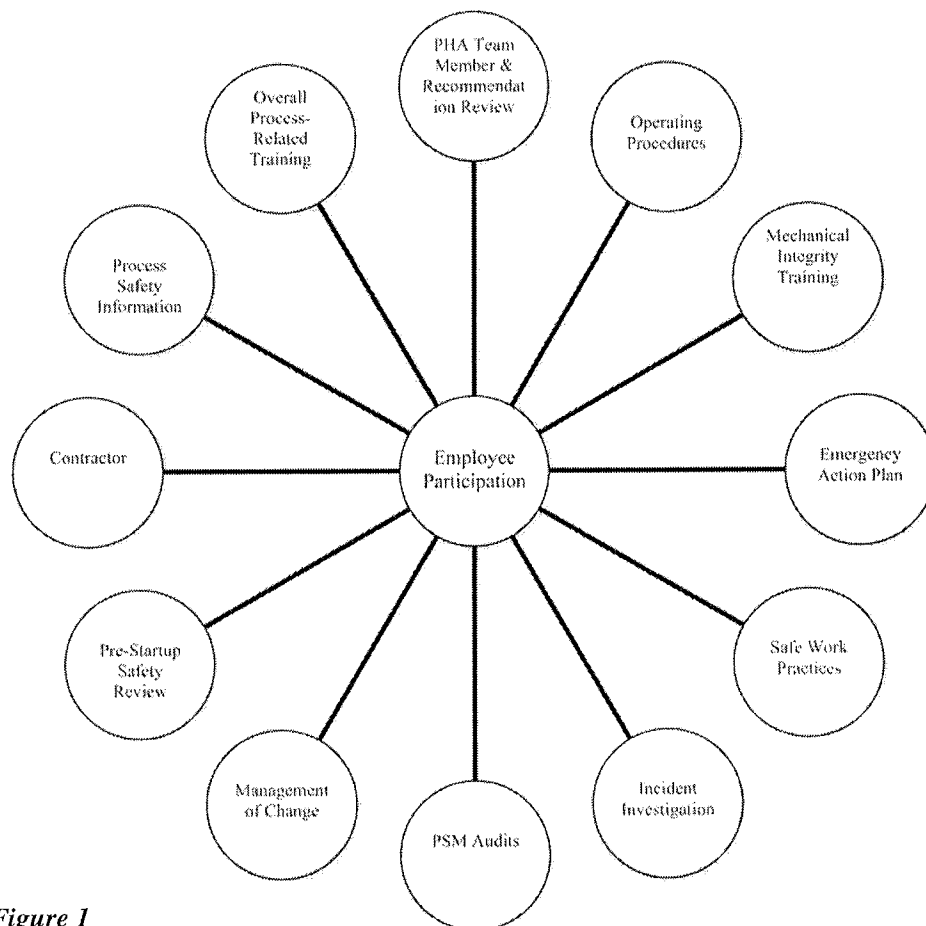


Figure 1
Employee Participation Foundation

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hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner.

Employers are also required to have, at a minimum, an emergency action plan for handling emergencies such as fires, ammonia releases, blackouts, earthquakes, etc. Not only the employees associated with your ammonia refrigeration are required to be trained in your emergency action plan, but all employees at the facility must know how to conduct a safe and orderly evacuation (1910.38(a)(5)).

Continuing on through the remaining PSM elements:

- Employees shall be provided with procedures on all safe-work practices including Lockout-Tagout, Hot Work

Permits, etc. in order to safely perform their job tasks.

- As necessary, selected employees may be asked to participate in the incident investigation team.
- The results of all PSM/RMP audits shall be available to all employees upon request.
- In the event of new or modified systems, where a Management of Change and Pre-Startup Safety Review is required, affected employees should be made aware of the modification and representatives, as previously noted, should be allowed to participate in the process hazard analysis.
- When contractors are coming on site, notification should be provided to managers of the area where they (the

Contact-a-Chapter

ALABAMA

BIRMINGHAM
alabama_chpt@reta.com

ARIZONA

PHOENIX
phoenix_chpt@reta.com
YUMA
southwest_chpt@reta.com

CALIFORNIA

BAKERSFIELD
kern_chpt@reta.com
DINUBA
central_valley_chpt@reta.com
LOS ANGELES
california2_chpt@reta.com
SALINAS
monterey_bay@reta.com
SAN JOSE
bay_area_chpt@reta.com
SANTA MARIA
santa_maria_valley@reta.com
STOCKTON
san_joaquin_chpt@reta.com
SOUTHERN CALIFORNIA
inland_empire_chpt@reta.com

DELAWARE

DELMAR
delmarva_chpt@reta.com

FLORIDA

JACKSONVILLE
north_florida_chpt@reta.com
LAKE WALES
central_florida_chpt@reta.com

GEORGIA

ATLANTA
atlanta_chpt@reta.com

IDAHO

MERIDIAN
treasure_valley_chpt@reta.com

ILLINOIS

CHICAGO
chicago_chpt@reta.com

INDIANA

FORT WAYNE
ft_wayne_chpt@reta.com

News From HQ

Contact-a-Chapter

by Don Tragethon, Executive Director

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MARYLAND

BALTIMORE
baltimore_chpt@reta.com

MINNESOTA

DETROIT LAKES
northern_plains_chpt@reta.com

N/S CAROLINA

CHARLOTTE
carolinas_chpt@reta.com

OKLAHOMA

TULSA
tulsa_chpt@reta.com

OREGON

PORTLAND
will_h_knox_chpt@reta.com

PENNSYLVANIA

HATFIELD
philadelphia_chpt@reta.com

WILKES BARRE
nepa_chpt@reta.com

YORK
sepa_chpt@reta.com

TEXAS

AMARILLO
high_plains_chpt@reta.com

HOUSTON
houston_chpt@reta.com

MANSFIELD
dallas_ft_worth_chpt@reta.com

WASHINGTON

CONNELL
connell_chpt@reta.com

PASCO
tri_cities_chpt@reta.com

PUGET SOUND
pugetsound_chpt@reta.com

GRANDVIEW
yakima_chpt@reta.com

WISCONSIN

BROOKFIELD
milwaukee_chpt@reta.com

MADISON
madison_chpt@reta.com

We have been working through the annual surveillance review by the American National Standards Institute (ANSI) of the Certification program. In March, we will recognize our second anniversary of accreditation. Since 2008, the examination forms (test questions) have been reviewed in response to comments and input from test takers and by review of performance characteristics of each question. The current form of the test question bank went into service in September 2009. The exam fee has increased, effective January 1, 2010 in order to meet the cost requirements of the exam delivery and development. The past few years, the program has been running at a negative, which is reasonable when considering the costs of attaining accreditation and maintaining the standards required by ANSI at HQ.

When we transferred test exam delivery to Kryterion in September 2009 we acquired a little bit more ability to provide the examination under proper security measures. We were able to test 11 candidates on-site at the annual Conference in Monterey, CA last October. The last time we were able to provide on-site testing like that was in 2003 in Georgia during the Conference.

We have two of the three *channels* for exam delivery working now. One is the brick and mortar exam companies provide through Kryterion sourced testing. The other is a RETA network center that meets special requirements to provide necessary security. The third channel is *on-line-proctoring* (OLP) that will make it possible for companies to establish a temporary testing center at their location and conduct testing of their operators on-site. There are technical challenges of bandwidth and hardware that need to be met, as well as procedural and facility requirements to ensure that appropriate security is in place and successfully administered. We have

already made a test run of this OLP system at RETA HQ and had to chase a few bugs out of the process. That's why it's called a test run.

After some more testing and, more importantly, the creation of adequate instruction documents for the design of an OLP testing site and the staffing requirements of an OLP site and the computer/network requirements are completed, we will begin offering this testing opportunity. It is feasible that companies that bring in training professionals to instruct personnel from their SOPs and theory sources (books) will be able to test their people locally. Watch for the announcement of this third channel being opened up for your certification needs.

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- contractor's employees) will be working and the expected type of work to be performed.
- Employees working on the ammonia refrigeration system shall be knowledgeable in the location and contents of the Process Safety Information (e.g., location of piping diagrams, how to read the diagrams, equipment data, etc.).

By looking at all of the PSM and RMP elements from Employee Participation out, you can be sure that your program hits the key employee-related issues and is truly your operators' program. When your operators own the program, it will get implemented.