



# RETA BREEZE

Refrigerating Engineers & Technicians Association

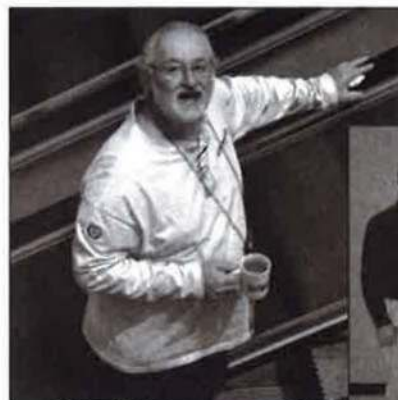
2013 Issue #6 (Nov./Dec.)

## RETA'S FUTURE

by Don Tragethon, Outgoing Executive Director

In the beginning of 2013, I wrote that RETA was in the process of seeking a person to take on my role of Executive Director. Through this year, work was accomplished that achieved that objective. My replacement is a person who has been an integral part of RETA's development and success during the past 12 years. It was in 2001 that I first encountered this gentleman in Portland, OR at the NWFPA annual conference. I was there to represent RETA and to speak on the certification program. Ammonia refrigeration and safety had a special emphasis that year within NWFPA. I participated in a plenary session where safety and engine room efficiency was discussed. I spoke about the reasons for having a certification program and the advantages of requiring (as an employer) that those who operate and maintain the refrigeration system are certified. When I opened for questions, a distinctive voice spoke up from the rear of the room that expressed a doubt that the test he just took really met the intended purpose. That was pretty audacious and I restated the purpose and advantages.

So, after the session concluded I sought out that voice. I shook Jim Barron's hand and thanked him for the comments and observation and invited him to join me on the RETA Certification Committee to make the program better. He accepted the invitation without hesitation. Jim isn't one to criticize and not offer solution(s) to a situation. That is a



## RETA 2013 National Conference



quality that you want to have when you are looking for people who can be trusted in a leadership position. Jim joined the committee and together the committee set out to meet the requirements of a righteous certification program. A proper certification program is one that is valid and defensible. We acquired information on the construction of assessment questions and with the help of our management firm at the

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## PSM/RMP Compliance

### INS & OUTS OF PSM/RMP COMPLIANCE SAFETY AUDIT

By HanhPhuc Nguyen, SCS Tracer Environmental

**W**hat!? AUDIT? Is it that time again?  
NO! Paperwork? Documentation?  
Proof? Long hours with auditors reading  
every little detail, and all the questions!

Do not panic! There is still time to learn  
about the Compliance Safety Audit  
process and plan in advance to ensure  
your audit experience is a success.

#### What is it?

A Compliance Audit is a systematic and  
methodical, independent review to  
ensure the required programs are docu-  
mented properly and to evaluate how  
well a facility (owner/operator) is imple-  
menting its written program.

#### Why do I have to conduct a Compliance Safety Audit?

The following regulations require regu-  
lated facility to conduct a compliance  
audit at least once every three years:

- OSHA's CFR Title 29, §1910.119,  
Process Safety Management of  
Acutely Hazardous Materials (PSM)
- EPA's 40 CFR Part 68, Risk Man-  
agement Program (RMP)

#### Purpose

A Compliance Safety Audit is conduct-  
ed to determine whether management  
systems are in place and function  
properly to ensure operating facilities,  
process facilities, and process units have  
been designed, constructed, operated,  
and maintained such that the safety and  
health of the employees, communities,  
and environment are being protected.

#### What are the requirements?

##### Audit Requirements:

- Be completed at least every three  
years.
- Include verification that the pro-  
cedures and practices that have  
been developed to comply with  
the risk management regulations  
are adequate and are being fol-  
lowed.
- Be conducted by at least one  
person knowledgeable in the  
regulated process.

##### Documentation Requirements:

- Generate a written report which  
documents the findings.
- The generated report must be  
certified by the employer (owner/  
operator).
- The employer (owner/operator)  
shall promptly determine and  
document an appropriate response  
to each of the findings.
- The facility shall document that  
deficiencies have been corrected.
- The employer (owner/operator)  
shall retain the two most recent  
Compliance Safety Audit reports.

The employers (owner/operator) shall  
consult with employees and their repre-  
sentatives on the conduct and  
development of the Compliance Safety  
Audit(s).

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## How does it work?

The Compliance Safety Audit requires an objective examination of risk management systems in place at the facility. To achieve this, an audit should be a distinct activity conducted by a designated team. The team should be made of an individual who is familiar and knowledgeable on the process, has experiences in the PSM and RMP programs, and is knowledgeable with the audit technique. The audit process is as follows:

*Step 1: Identify the standards and regulations to which the facility must comply.*

*Step 2: Collect data on the current practice by:*

- Reviewing the written PSM/RMP program.
- Collect and review all records.
- Conduct interviews with upper management, operators/maintenance personnel, and other employees who are not directly involved with the process, and
- Conduct a physical site inspection by walking around the facility and taking notes on what was observed.

*Step 3: Compare the collected information to the written PSM/RMP program to determine how well the facility is implementing it and to identify deficiencies.*

*Step 4: Generate a written report.*

The written report at a minimum should include:

- The name and title of the audit team members;
- A description of the audit methodology used;
- A list of the deficiencies found and recommendations on how to correct the deficiencies; Compliance Safety Audit Certification page; and
- Compliance Safety Audit Forms which contain information gathered during the compliance safety audit.

The report should clearly communicate the findings and observations and contain clear and concise report facts with supportable information.

*Step 5: Plan the necessary change.*

The facility (owner/operator) will need to review the Compliance Safety Audit report, pay close attention to the recommendations, and set a plan of action. Any disagreement with the audit findings should be resolved by the next level of management. If management determines that no action is necessary for a documented finding(s), document this decision and include supporting facts in the Compliance Safety Audit report.

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The action plan should at a minimum include:

- Consult with all affected employees and their representative on the conduct and development of the Compliance Safety Audit;
- Create a tracking form for recommendations;
- Determine timeline for completion of each recommendation and assign task(s) to personnel as the responsible party for ensuring the specific task is completed in a timely manner; and
- Schedule periodic group meetings for follow-up on the status of the recommendations.

#### Step 6: Implement the change

- The party responsible for each recommendation must ensure the change is in progress and document change(s) made.
- The status of each recommendation should be updated on a recommendation tracking form and should include what action was completed, when it was completed as well as include documentation as proof of completion for each recommendation.

#### Where are the available audit tools?

The OSHA and EPA available audit forms for use are:

- OSHA Process Safety Management Audit Questions Checklists
- EPA RMP Auditing Checklists are available in the "General Guidance on Risk Management Programs for Chemical Accident Prevention (40 CFR Part 68) (EPA550-B-04-001)
- American Institute of Chemical Engineers

#### Benefits of Compliance Safety Audits

- Uncover areas of weakness and where to improve prior to a regulatory inspection.

- Clarifies the PSM and RMP requirements.
- Ensures the written program is an accurate reflection of what is practiced at the facility.

Think of the Compliance Safety Audit as your periodic physical checkup. It's a dreadful process, but yields beneficial results to the health of the facility's management system for compliance with the written PSM/RMP programs. It is a cyclical process which will not go away. So, the more you know the better!

#### REFERENCES

1. EPA's General Guidance on Risk Management Programs for Chemical Accident Prevention (40 CFR Part 68), March 2009.
2. Guidelines for Auditing Process Safety Management Systems, Center for Chemical Process Safety of the American Institute of Chemical Engineers, New York, New York, 1993.

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