DUSTY BOOKS: IMPLEMENTING YOUR RMP/PSM PROGRAM

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By now, most ammonia refrigeration facilities have developed accidental release prevention programs for compliance with EPA's Risk Management Program and OSHA's Process Safety Management rules. However, many facilities struggle with the next step: turning the written policies in the programs into day-to-day tasks and activities.

Once a program is developed, the goal is to create a system that enables your facility to break down each of the program elements into manageable tasks that you can document.

"The owner or operator of a stationary source with processes subject to Program 2 or Program 3 shall develop a management system to oversee the implementation of the risk management program elements." [45 CFR §68.15(a)]

This section is vital, and easily overlooked by even the most experienced RMP/PSM guru. Often a significant amount of effort is put into developing the program elements

themselves, but a structured system is needed to ensure each program is included in day-to-day activities.

That all sounds great, but how do we go about doing that?

Create a PSM/RMP team and hold periodic meetings.

A good place to start is to select members for a PSM/RMP team for the facility. Consider including personnel from several departments (maintenance supervisor, environmental compliance, safety coordinator, plant manager, etc.). Meetings of the PSM/RMP team should be scheduled to discuss operations at the facility. A well-rounded PSM/RMP team that meets regularly is able to plan for expected changes to the system (management of change), schedule mock evacuation drills (emergency action/response plan), review refresher training schedules (training), and more. Inviting other employees to participate in the PSM/RMP team meetings also provides them an opportunity to communicate concerns or questions with management per the Employee Participation Program [40 CFR §68.83(b)].

While facilities are required to designate one person who is ultimately responsible for overall implementation of the programs [45 CFR §68.15(b)], this becomes much more manageable with a team that can split up the responsibility for each program element.

Create a visual organizational chart and assign programs to the right people.

"When responsibility for implementing individual requirements of this part is assigned to persons other than the person identified under paragraph (b) of this section, the names or positions of these people shall be documented and the lines of authority defined through an organization chart or similar document." [45 CFR §68.15(c)]

Facilities are also required to develop and include an organization chart that delineates which parties are responsible for implementing each section of the programs. This chart should indicate the RMP responsible person, along with boxes detailing key personnel, and the program elements they are responsible for implementing.

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For example, the maintenance supervisor or lead refrigeration technician would likely be listed as responsible for reviewing operating procedures, completing maintenance records, and training new technicians. A safety coordinator may be in charge of updating the Emergency Action/Response Plan, managing contractor safety documents, and performing ammonia awareness training.

However you decide to assign the programs, this chart should be facility specific and up to date with current names and titles. A giveaway that the programs are gathering dust is a chart showing programs assigned to a title that no longer exists, or an individual who has long since left the company. Remember: these programs are intended to be living documents that change over time. If key players of the PSM/RMP team retire, change roles, or leave the facility, ensure that this chart detailing responsibilities is updated in a timely manner.

Determine the frequency of required tasks for each program and organize.

Once the programs have been assigned to specific individuals, the next step is to determine what the major tasks are for each program and when they need to

be done. This can seem intimidating at first, but can be easily achieved with a brief review of each program and some organization:

- Consider creating a table, with each program listed;

- for each program, list all major tasks associated with it;

- reference your program; and

- indicate when each of these tasks is required to be completed.

The end result is a table listing all of the programs that detail what needs to be done for each program and when. This is a great tool to reference during PSM/RMP meetings, as it gives us real world action items that can be tracked and completed.

You can also take it a step farther, and create a compliance calendar. If we know the frequency of major tasks (three year compliance audits, annual operating procedure certification, semi-annual maintenance, etc.) we can assign each one to a date on a calendar. A dedicated calendar complete with due dates for reports or submittals can help avoid missing a major deadline by mistake, which would otherwise create holes in your recordkeeping.

Make sure to track and document all completed PSM/RMP related tasks.

Last, it is crucial to document the completion of all completed PSM/RMP tasks. A good general philosophy to adopt is if you do not have a signed and dated record of a task being completed, it never was.

- Facilities are required to track and document the completed

recommendations generated from a Process Hazard Analysis and maintain records for the life of the process [29 CFR §1910.119(e)(7)].

- All incident investigation reports should be retained for five years [29 CFR §1910.119(m)(7)].

- Facilities are also required to document that all deficiencies from a compliance audit have been corrected [29 CFR §1910.119(o)(4)] and must retain copies of the two most recent audit reports [29 CFR §1910.119(o)(5)].

- For all training conducted for employees operating the process, facilities must prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training [40 CFR §68.71(c)].

The general take-away is that for each task completed at the facility, there should be an associated documented record of that task stored somewhere on-site. As records can start to pile up quickly and can easily become lost or scattered, consider storing PSM/RMP records for the facility in one place for easy access. A good indicator of healthy PSM/RMP programs is a bread crumb trail of completed records that date back for years.

Remember, PSM is a 13 (14 if you include Trade Secrets) element program. Add in the extra components of the RMP and you have a lot to deal with. Many sayings come to mind…you need to eat the elephant one bite at a time…Rome wasn't built in a day…it takes a village. Use the requirements set forth in the RMP regarding a management system to build your PSM/RMP team.