

# PSM/RMP DOCUMENT RETENTION SCHEDULE - TRASH OR STASH?

By HanhPhuc Nguyen and Jennifer Green, SCS Tracer Environmental

Tired of stepping over piles of paperwork in your office and listening to your boss hounding you about the trip hazard, fire hazard, and most of all the pile being an eyesore? The Storage Room is completely full, so the only solution is to get rid of the old paperwork. Then the statement "If there's no documentation, you didn't do it," flashes through your mind. Fine Fine Fine! So you're standing in your office, eyes getting dry and blurry with a spell of fatigue kicking in and next thing you know, you've been standing there staring mindlessly for a couple of hours.

The solution to your problem is a **Document Retention Schedule.**

With the PSM standard being around since 1992 and the Federal RMP being now 10 years old, we have amassed volumes of paperwork. Some of us are on our sixth or seventh compliance audit! What can be tossed (trash pile) and what do we need to maintain for compliance purposes (stash pile)?

A record retention schedule provides the amount of time you are required to retain your Process Safety Management/Risk Management Program (PSM/RMP) records before final disposition. Although the EPA's RMP and OSHA's PSM programs state the required retention period for some prevention programs, they do not specify for all. As stated by the EPA, "The owner or operator shall maintain records supporting the implementation of this chapter for five years unless otherwise provided in subpart D of this part" 40 CFR §68.200.

Below is a sample document retention schedule table that can be customized to your PSM/RMP Program. For this sample, we reviewed each PSM prevention program element and listed where the code defines a record or document retention period. Please note that the table below only includes general keypoints and suggestions for compliance with PSM/RMP. It is only intended to be a tool to get your facility started on your document retention schedule.

PREVENTION PROGRAM	CODE REFERENCE FOR RECORD RETENTION	RETENTION PERIOD FOR COMPLIANCE
Employee Participation	Employers shall consult with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in this standard. Code does not specify a retention period. 1910.119(e)(2) / 40 CFR §68.83	Employee Participation is generally conducted through the training program. Refer to the Training program.
Process Safety Information (PSI)	No specific forms/records, refer to Management of Change (MOC) as it pertains to PSI. 1910.119(d)(2) / 40 CFR §68.65	

## RETA Chapter Meeting Schedule

### N/S CAROLINA

CAROLINAS  
1<sup>st</sup> Thursday; time varies  
No meeting in June, July or August  
GREATER RALEIGH (NC)  
No meeting in June, July or August

### NEBRASKA

OMAHA  
To be determined

### NEVADA

SOUTHERN NEVADA  
2<sup>nd</sup> Monday; 5 pm

### NEW YORK

WESTERN NEW YORK  
3<sup>rd</sup> Tuesday; 6 pm

### OREGON

WILL H. KNOX  
2<sup>nd</sup> Tuesday

### OKLAHOMA

TULSA  
2<sup>nd</sup> Tuesday; 6:30 pm

### PENNSYLVANIA

NORTHEASTERN (NEPA)  
4<sup>th</sup> Thursday; 6 pm  
SOUTHEASTERN (SEPA)  
2<sup>nd</sup> Tuesday; 6:30 pm  
No meeting in June, July or August  
PHILADELPHIA  
3<sup>rd</sup> Thursday; 6 pm  
No meeting in June, July or August

### TEXAS

HIGH PLAINS  
3<sup>rd</sup> Tuesday; 7 pm  
DALLAS/FT. WORTH  
3<sup>rd</sup> Thursday; 7 pm  
HOUSTON  
4<sup>th</sup> Thursday; 6:30 pm  
No meeting in July, November or December

### VIRGINIA

OLD DOMINION  
2<sup>nd</sup> Thursday; 6:30 pm

### WASHINGTON

CONNELL  
2<sup>nd</sup> Thursday; 6 pm  
TRI CITIES  
2<sup>nd</sup> Thursday; 6 pm  
PUGET SOUND  
2<sup>nd</sup> Wednesday; 6 pm

### WISCONSIN

MADISON  
2<sup>nd</sup> Tuesday; 6 pm  
No meeting in June, July or August  
MILWAUKEE  
2<sup>nd</sup> Thursday; 5 pm  
No meeting in June, July or August

# Industry News

## Facility Expansions

Stellar recently completed United States Cold Storage's (USCS) phase-two expansion of its Turlock, CA refrigerated warehouse, and began construction on Dot Foods' expansion of its Mt. Sterling, IL facility.

New additions to the USCS facility included a 39,000-square-foot, -20 degree F freezer; two convertible rooms with temperatures ranging from +35 degree F to -20 degree F; and a 9,000-square-foot, +35 degree F shipping dock. The Dot Foods expansion includes a -10 degree F freezer, two +35 degree F shipping and loading docks and a +35 degree F connecting corridor.

Stellar is an architecture, engineering, construction and mechanical services firm.

## CRYOflex™ Insulation

Nomaco Insulation recently introduced a two-course program designed to train and certify ammonia refrigeration professionals in using CRYOflex™ insulation, specifically designed for the industrial refrigeration market. The training helps validate existing skills sets, expose users to alter-

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PREVENTION PROGRAM	CODE REFERENCE FOR RECORD RETENTION	RETENTION PERIOD FOR COMPLIANCE
Process Hazard Analysis	Employers shall retain process hazards analyses and updates or revalidations for each process covered by this section, as well as the documented resolution of recommendations described in paragraph (e)(5) of this section for the life of the process. 1910.119(e)(7) / 40 CFR §68.67	Maintain all PHA reports, updates, addendums, revalidations, and recommendation tracking for the life of the process. This includes the initial PHA.
Operating Procedures	The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to facilities. The employer shall certify annually that these operating procedures are current and accurate. 1910.119(f)(3) / 40 CFR §68.69	<u>Minimum:</u> Maintain annual review form, certification page, and summary of edits for 5 years per the EPA requirement.**
Training	Code does not specify a retention period. 1910.119(g) / 40 CFR §68.71 PSM requires retraining at least every 3 years and a written training record. 1910.119(g)(2)	<u>Minimum:</u> Maintain records for 5 years per the EPA requirement.** <u>Suggestion:</u> Maintain all training records during the worker's full period of employment. Your company may even set a policy to retain training records for a period after employment has been terminated (i.e. 3 Years for Auditing purposes*).^2
Contractors	Code does not specify a retention period. 1910.119(h) / 40 CFR §68.87	<u>Minimum:</u> Maintain records for 5 years per the EPA requirement.** <u>Suggestion:</u> Maintain all records (i.e. training, certification, evaluation, etc.) during the contractor's full period of employment. Your company may even set a policy to retain records for a period after employment has been terminated (i.e. 3 Years for Auditing purposes*).
Pre-Startup Safety Review	Code does not specify a retention period. 1910.119(i) / 40 CFR §68.77	Maintain records for 5 years per the EPA requirement.**
Mechanical Integrity	Code does not specify a retention period. 1910.119(j) / 40 CFR §68.73	Maintain records for 5 years per the EPA requirement.** <u>Suggestion:</u> Develop an independent retention policy for Inspection Records and one for Maintenance Records.***
• Oil Log		<u>Suggestion:</u> Maintain records of oil added/removed for the life of the process.

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PREVENTION PROGRAM	CODE REFERENCE FOR RECORD RETENTION	RETENTION PERIOD FOR COMPLIANCE
Hot Work Permit	The permit shall be kept on file until completion of the hot work operations. 1910.119(k)(2) / 40 CFR §68.85	<u>Suggestion:</u> Develop a log of Hot Work Permits to show the implementation history.*
Management of Change (MOC)	Code does not specify a retention period. 1910.119(l) / 40 CFR §68.75 1910.119(l)(4) implies that MOCs addressing chemicals and equipment become a part of the PSI providing a record of the original design and design intent but also a record of all changes. <sup>1</sup> 1910.119(l)(5) implies that MOC's related to changing procedures and practices should be retained until it is incorporated in the next PHA. <sup>1</sup>	MOC's for the <b>chemical or equipment</b> must be retained for the life of the process through their incorporation in the PSI. <sup>1</sup> MOC's for <b>procedures and practices</b> should be maintained for 5 years. <sup>1</sup>
Incident Investigation	Incident investigation reports shall be retained for five years. 1910.119(m)(7) / 40 CFR §68.81(g)	Maintain records for 5 years.
Emergency Planning & Response	Code does not specify a retention period. 40 CFR §68.95	
• Evacuation Drills	Training for all employees in relevant procedures. 40 CFR §68.95(a)(3)	<u>Suggestion:</u> Refer to the Training program for employee participation documentation which includes evacuation drill records (i.e. head counts, evaluations, and any correspondence with the local fire department and LEPC).
Compliance Audits	Employers shall retain the two (2) most recent compliance audit reports. 1910.119(o)(5) / 40 CFR §68.79	Maintain two most recent reports. <u>Suggestion:</u> Maintain the certification page and recommendation tracking for the life of the process to show the history of implementation.*

\* Employers shall certify that they have evaluated compliance with the provisions of this section at least every three years to verify that the procedures and practices developed under the standard are adequate and are being followed. 1910.119(o)(1)

\*\* The owner or operator shall maintain records supporting the implementation of this chapter for five years unless otherwise provided in subpart D of this part. 40 CFR §68.200

\*\*\* Maintenance records (i.e. sensor calibration, oil analysis, five year mechanical integrity inspections, etc.) are much like medical records in that they provide equipment history and trending.

One very last suggestion for those who ABSOLUTELY don't have the storage space for

all the paperwork, consider scanning and saving your facility's records electronically.

As stated earlier, the document retention schedule above is only intended to be a tool to get your facility started on your own retention schedule. Review your PSM/RMP program and develop your own document retention schedule through consultation with your corporate office and where applicable your Local Emergency Planning Committee (LEPC) to determine how long each record remains in the 'STASH' pile and when to put them in the 'TRASH' pile.

1: OSHA Standard Interpretation to Mr. E. C. Palmer, Jr. from Edwin G. Foulke, Jr., Dated July 12, 2006. (Note: This is a federal interpretation, states may have different interpretations.)

2: OSHA Defense League ([www.oshadefenseleague.com/faq\\_workplace.html#27](http://www.oshadefenseleague.com/faq_workplace.html#27)), Question#12. Copyright 2007. Accessed June 1, 2012.

## Industry News

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native pathways and demonstrate a proficiency in this insulation technology.

Additional information can be found at <http://www.cryoflexinsulation.com/cryoflex/enu/installation.html> or call at 252-563-1732

With more than 30 years of experience, Nomaco Insulation is a leader in manufacturing engineered polyolefin foam insulation (EPFI). For more go to [www.nomacoinsulation.com](http://www.nomacoinsulation.com)

### Have an EVAPCO® system?

EVAPCO®, a manufacturer of high quality heat transfer products for the HVAC and Industrial Refrigeration markets, has partnered with Watertech, a provider of water treatment products and services.

For additional information on this partnership go to: [www.watertechusa.com](http://www.watertechusa.com) or [www.evapco.com](http://www.evapco.com).