



RETA BREEZE

Refrigerating Engineers & Technicians Association

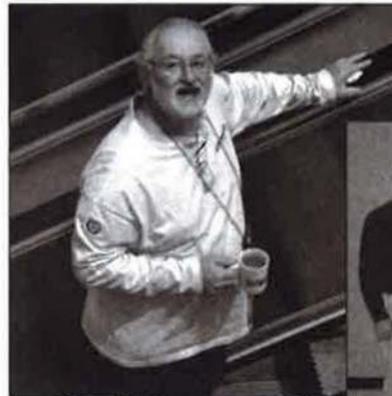
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RETA'S FUTURE

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



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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

What!? 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 documented properly and to evaluate how well a facility (owner/operator) is implementing its written program.

Why do I have to conduct a Compliance Safety Audit?

The following regulations require regulated 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 Management Program (RMP)

Purpose

A Compliance Safety Audit is conducted 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 procedures and practices that have been developed to comply with the risk management regulations are adequate and are being followed.
- 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 representatives 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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