

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 Safety Audit Requirements

Lee Pyle, Tracer ES&T

Purpose

The following regulations require a facility to conduct a compliance audit every three years:

- State and Federal OSHA Process Safety Management regulations; and
- EPA Risk Management Program (40 CFR Part 68).

The intent of this audit is to self-evaluate the effectiveness of the risk management and safety programs by identifying deficiencies and ensuring corrective actions.

Overview

A compliance safety audit should ensure that effective risk management systems are in place and working. For example, the audit can verify that the training program is complete and that employees are being trained. The audit, through its systematic analysis of compliance with the standard, can identify problems and assist a facility in directing attention to weaknesses in its risk management and safety programs.

An audit has two parts. First, the auditor(s) must understand the risk management system in place including the two regulations mentioned above (PSM and RMP) to address each provision of the standard and determine the adequacy of the facility's risk management system, as it is intended to function. The auditor(s) must also be able to verify that each section is actually implemented. This requires that the facility maintain meticulous records of all risk management activities.

An audit requires an *objective* examination of risk management systems in place. To achieve this, an audit should be a distinct activity conducted by a designated team or individual.

Procedures

Below is a list of audit requirements:

- A Compliance Safety Audit must be completed at least every three years.
- The Compliance Safety Audit must include verification that the procedures and practices that have been developed to comply with the risk management regulations are adequate and are being followed.

- The Compliance Safety Audit shall be conducted by at least one person knowledgeable in the processes.

Below is a list of documentation requirements:

- The Compliance Safety Audit must be certified.
- A written report of the findings of the audit shall be developed.
- The employer shall promptly determine and document an appropriate response to each of the findings of the Compliance Safety Audit.
- The facility shall document that deficiencies have been corrected.
- The two most recent Compliance Safety Audit reports shall be retained by the employer.

The Compliance Safety Audits shall be made available to employees and their designated representatives.

Forms

Both OSHA and EPA have made available detailed forms that facilities can use to conduct the audit.

Document Management

The Compliance Safety Audit Form(s) must be completed by someone who is knowledgeable in the processes.

The Compliance Safety Audit Certification page is attached to the Compliance Safety Audit Form after completion of the Compliance Audit.

The Compliance Safety Audit Report of Findings is developed from the information gathered during the Compliance Safety Audit. This information is periodically reviewed and updated to ensure that an appropriate response is documented for each finding, and that each deficiency is corrected. When all items have been appropriately addressed the Compliance Safety Audit Report of Findings is retained with the Compliance Safety Audit.

If there is a disagreement with an audit finding, the problem will be resolved by

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PSM/RMP COMPLIANCE SAFETY AUDIT REQUIREMENTS

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the next level of management. In addition, if an audit finding has been reported and management feels no action is necessary, this decision and its basis should be documented in the Compliance Safety Audit report.

Personnel

The Compliance Safety Audit must be completed by appropriate representatives from the staff who are knowledgeable in the processes. The audit should be conducted or led by a person knowledgeable in audit techniques and who is impartial toward the facility or area being audited.

The facility must certify the Compliance Safety Audit. The certifier is generally a member of management at the facility that is not exposed to the potential hazard. The certifying person should also be at a level that is capable of committing the necessary resources to correct any deficiencies discovered in the audit.

References

1. OSHA Instruction CPL 2-2.45A. September 28, 1992, *Process Safety Management of Highly Hazardous Chemicals*.
2. 29 CFR 1910.119 *Process Safety Management of Highly Hazardous Chemicals*, paragraph (o).
3. *Guide to the Implementation of Process Safety Management (PSM) for Ammonia Refrigeration*. International Institute of Ammonia Refrigeration.
4. *Chemical Process Safety Report*. Thompson Publishing Group., 1994.
5. *California Code of Regulations, Title 8, Section 5189, Process Safety Management of Highly Hazardous Chemicals*, paragraph (o).
6. *Code of Federal Regulations, Title 40 Part 68, Clean Air Act 112(r), Risk Management Program Rule*.
7. *California Code of Regulations, Title 19, Division 2, Chapter 4.5 - California Accidental Release Prevention (CalARP) Program (June 28, 2004)*.

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