

# PSM/RMP Compliance Audits: Who Should Perform Them? Part 2

by William Lape

In the last issue of the Breeze, we discussed the pros and cons of using internal versus external resources to conduct PSM/RMP compliance audits. In this edition, we will delve further into what an end user should look for in a consultant should they choose to hire one to perform such audits.

The first thing that one should look for when choosing a consultant is the amount of experience that the firm has in evaluating programs against the PSM/RMP regulations. If the company is relatively new to the world of auditing PSM/RMP programs, you may want to dig a little deeper into the experience of their staff.

It never hurts to request to see the resumes of their staff, particularly those who will be conducting the audit. While it should not be a deal breaker if a young, relatively inexperienced person will be conducting the audit, you need to determine what sort of support structure they have. Are there experienced auditors at the company that will be able to assist the newer person? If so, will they be supporting remotely, or assisting on site?

In lieu of years of experience, what sort of training has the auditor had related to the PSM/RMP regulations and how to audit them? While we are talking about training, is the auditor familiar with your covered process, or just PSM/RMP in general? One of the great downfalls in our industry is when an end user hires a consultant who gives the best price but has little or no experience with ammonia refrigeration. While the regulations require that only one person on the audit team is knowledgeable on the covered process, it helps if all members of the team are also knowledgeable.

Speaking of the team members, how many members is the consultant supplying? How many does the consultant expect the customer to supply? While most end users would prefer that their employees not be bothered, the reality is that at least a few of them will need to be involved throughout the entire audit.



Now on to the audit questions. How does the consultant propose to examine the program paperwork and documentation? Do they have a checklist, or a set of questions to ask? Are they asking for documentation to be supplied ahead of time? If the end user uses a cloud based document management system, it may be possible to grant the consultant access to the system ahead of time, so that the paperwork may be reviewed remotely, thus cutting down on the required time on site.

On to auditing the implementation side of the program. Has the auditor requested that employees be made available for interviews? Have they requested a walk around of the system?

All of these questions weigh into the final decision of who to hire.

Now that the consultant has been picked and hired, it is time to evaluate their performance. This will help determine the quality of the audit and whether or not you will wish to hire them again. This evaluation often starts prior to the audit. Has the auditor coordinated with you and your staff to make scheduling arrangements? Have they been clear on their needs, both from a team member, as well as an interviewee standpoint? How about other items like power for computers, network connectivity, a space to work? Have they coordinated a closeout meeting with your staff, and particularly the person with overall responsibility for the PSM/RMP programs?

When they are on site do they conduct themselves in a professional manner, including dress and mannerisms? During the walkaround, do they exhibit evidence that they know what they are looking at? How detailed are they in their system examination? I myself make a habit of examining every vessel nameplate that is reasonably accessible without drastically extending the time required for the audit and cross check

them against their U sheets in the program documentation. You do have those, right?

After the audit, take a look at the report. Do the consultant's recommendations seem reasonable or appear to be overly detailed? Did they discuss the reason for them during the closeout meeting?

Now for an update about third party audits. In the part 1, I mentioned that the recent EPA amendments to the RMP rule call for audits to be conducted by third parties under certain circumstances, such as after an RMP reportable accident. Since the last issue went to press, the EPA has issued a request for comment in the federal register regarding amendments to the final RMP rule amendments that was published in January 2017. This proposal, if adopted, would rescind all provisions related to third party audit requirements, as well as safer technology and alternatives analyses and incident investigation root cause analysis. This is to allow the EPA to better coordinate revisions to the RMP rule with OSHA and its PSM standard.

The proposal also rescinds most of the public information availability provisions of the amendments, but

retains the provision requiring a public meeting after an accident, but with minor modifications.

Finally, the proposal modifies the emergency response coordination and exercise provisions of the amendments to provide more flexibility in complying with these provisions. It also addresses security concerns raised by industry.

Details of the proposed change can be found at: <https://www.epa.gov/rmp/proposed-risk-management-program-rmp-reconsideration-rule>.

The long and the short of it is that our industry is in regulatory flux. While this often gives corporate compliance people headaches, it doesn't have to keep them up at night with a massive workload. Consultants are an option if you lack manpower or expertise.

*Bill Lape is a Project Director for SCS Engineers: Tracer Environmental Services. The opinions expressed within are solely his and do not necessarily reflect the opinions, policy or position of SCS Engineers or its affiliates. Bill is a Certified Industrial Refrigeration Operator and a member of the National Board of Directors of the Refrigerating Engineers and Technicians Association*