



PSM/RMP/ARM REFLECTIONS AND PLANNING FOR THE NEW YEAR

by William Lape

The end of the year is always a time for reflection and planning. We ask ourselves questions like, “What went wrong this year? What went right? What must we do next year? What should we do next year? How much will it cost?” It is during this reflection and planning period that we need to look closely at our ammonia refrigeration management programs, be they Process Safety Management (PSM) / Risk Management Plan (RMP) or Ammonia Refrigeration Management (ARM) for those facilities with less than 10,000 pounds of ammonia in their process.

We need to review the compliance calendar. If you manage your program well, there should be no overdue items, but let’s face it: stuff happens. Now is the time to catch up on any items that were due this year, but that have fallen through the cracks. Do your Standard Operating Procedures (SOPs) still need certified for the year? Now is the time to go through them and verify that they are still current and accurate. If you have kept up with this task in the past, and your Management of Change (MOC) program is robust, this should be relatively easy to accomplish, especially if you have a support within your department. Spread this task amongst the operators. They are the ones who

are supposed to be using the Operating Procedures on a routine basis.

Are your recommendation lists for your Process Hazard Analyses (PHAs), Compliance Audits, Mechanical Integrity (MI) audits, and past Incident Investigations out of date? Go through them with your team and update the actions. Ensure that all of the responsible parties listed in the open recommendations are still accurate. Nothing screams “lack of implementation” to an inspector like out of date action plans. Make sure that the tentative due dates for the open recommendations are a reasonable time in the future. Don’t enter the same due date for every recommendation unless the team really feels that they are realistic for the amount of work involved, coupled with all of its other responsibilities. Prioritization is the key. For instance, if the year got away from you and the annual MI audit that is specified in your Recognized and Generally Accepted Good Engineering Practice (RAGAGEP) wasn’t done, it should be at the top of your action list. As I said earlier, stuff happens, but don’t bury your head in the sand. If we properly prioritize our actions, items that are overdue can be accomplished within a reasonable time frame after

their due dates. This may or may not prevent a citation, but showing that you are making a concerted effort to do the right thing goes a long way in the good will department.

Now that we have finished our overdue items, or put a plan in place to accomplish them soon, it is time to plan for the next fiscal year. Go through your upcoming compliance items and make sure that appropriate funds are budgeted in the proper timeframes to accomplish them. While you are at it, if you use outside contractors or consultants to facilitate, or do these items, schedule them now. Nothing puts a wrench into planning like budgeting a compliance item cost for May, only to reach out to your consultant in April to find that he or she is booked until June. Even worse, you circle back to your backup consultant (We all have those, right?), only to find that they are double the cost of your preferred consultant.

Capital projects for the next fiscal year likely will have already been planned at this time. However, if you find yourself working on these plans, be sure to start your Management of Change process now. While planning your project, review it against your PHA and make sure that none of your safeguards for which you have taken credit have been

invalidated due to the project. Make sure that the project will not introduce new hazards not previously considered. Once this review is done, ensure that the project scope meets the requirements of current codes and standards. For instance, if you are adding a compressor to your refrigeration system and you are tying its Safety Relief Valves (SRVs) into your machine room vent header that was installed in the 1990s, you will need to update the header to meet current back pressure requirements, if you have not already done so. Make sure that this is budgeted in the project. While we are talking about adding a compressor, review the machinery room ventilation. If the ventilation system in your machine room was installed in the early 2000s (or even earlier), you will need to review the system to ensure that it meets current codes and standards. Again, this will need to be included in the project scope. Other items that will need to be reviewed for your project include, but are not limited to, ammonia detection, lighting, eyewash/showers, and fire protection.

Reflection, as a means of self-evaluation of the robustness of your refrigeration management system, is critical to the continuing success of your program. Proper planning is another vital element of your program. Together, they will help ensure the continuing safety of you, your employees, and the public.

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