PSM/RMP "Best Practices" and OSHA 2015 Enforcement Update

Jonathan Zimmerman, Kellogg's

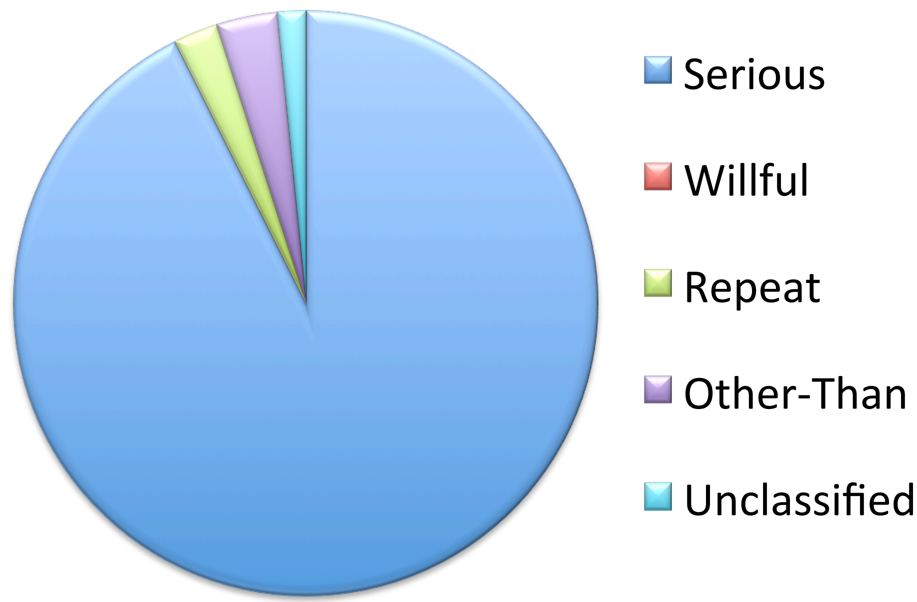
Bryan Haywood, SAFTENG.net LLC

OSHA PSM Activity

FEB 27, 2014 - MAR 30, 2015

Citations = 332

- Serious = 301
- Other Than = 18
- Repeat = 8
- Unclassified = 5
- Willful = 0



Dollars = $804,998

Element by $ Amounts

FEB 27, 2014 - MAR 30, 2015

#1 MI = $263,729 (59)

#2 SOPs = $175,290 (72)

#3 PHA = $135,305 (43)

#4 PSI = $77,355 (53)

#5 MOC = $33,475 (19)

#6 EP = $22,375 (12)

#7 ER = $21,025 (11)

#8 Training = $17,650 (17)

#9 PSSR = $15,399 (13)

#10 Contractor = $14,100 (14)

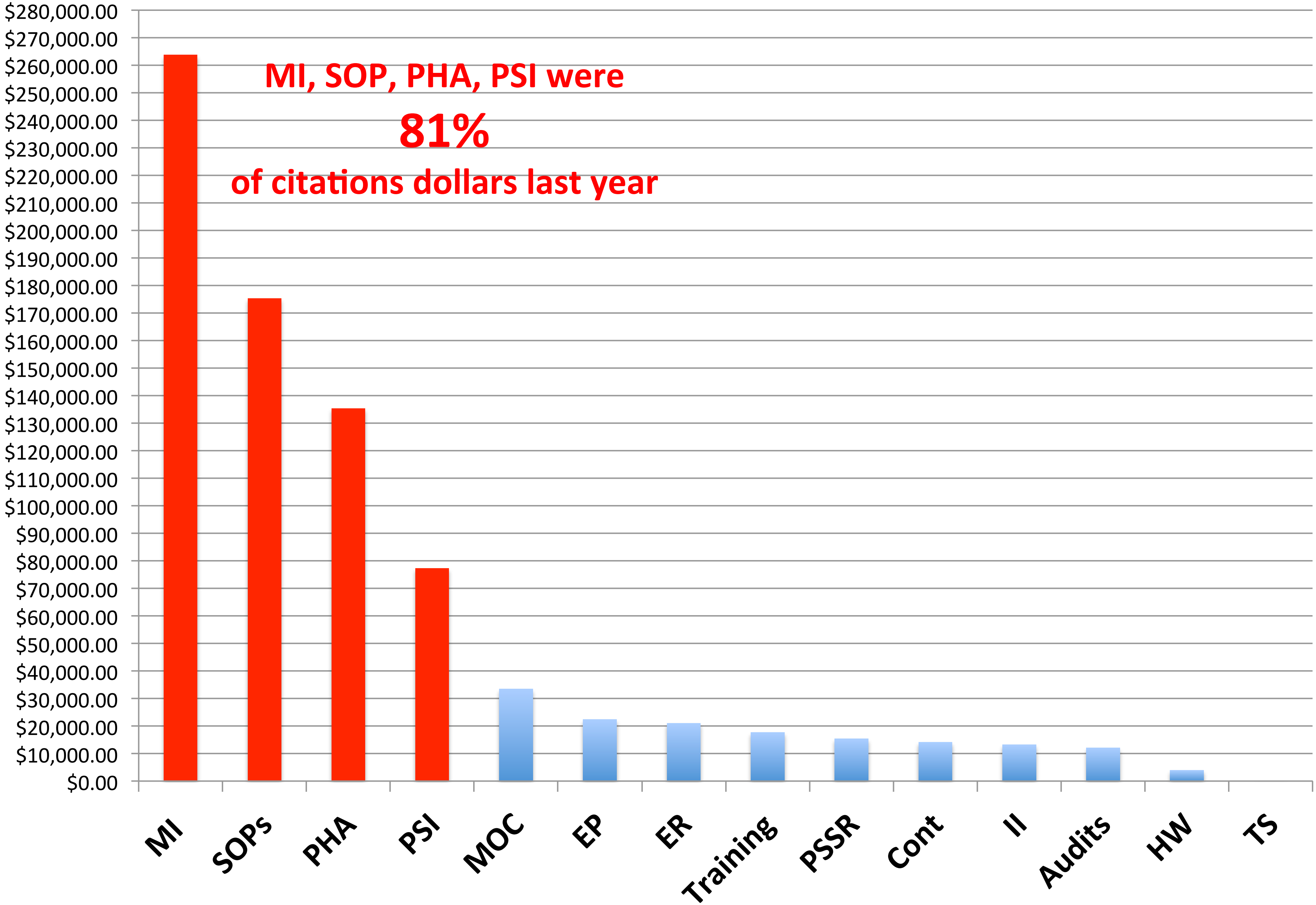
#11 II = $13,245 (6)

#12 Audits =$12,050 (13)

#13 HW = $4,000 (1)

#14 TS = NO Trade Secret Citations

Element by $ Amounts



Element by # of Citations

FEB 27, 2014 - MAR 30, 2015

#1 SOPs = 72

#2 MI = 59

#3 PSI = 53

#4 PHA = 43

#5 MOC = 19

#6 Training = 17

#7 Contractor = 14

#8/9 PSSR = 13

#8/9 Audits = 13

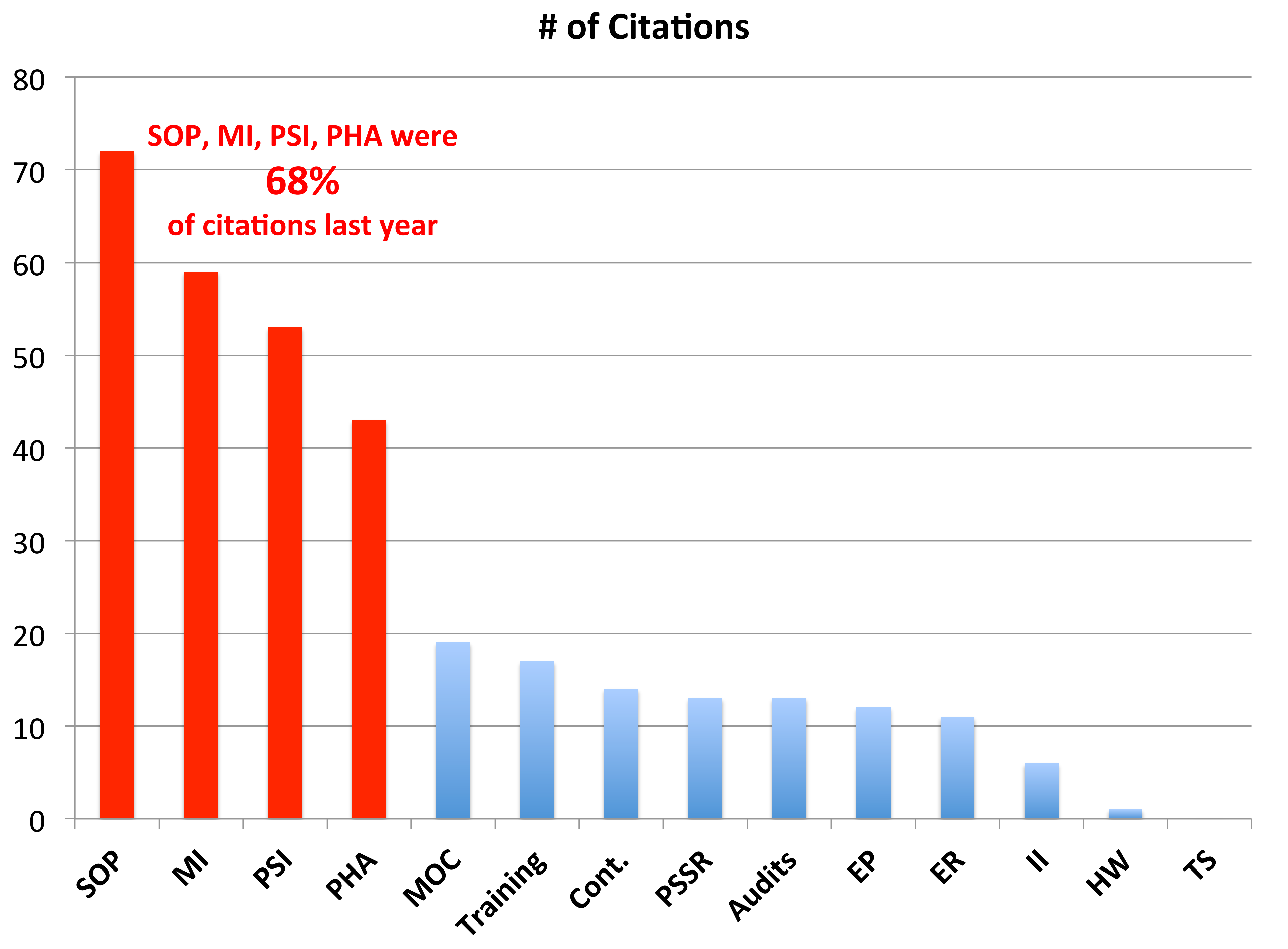
#10 EP = 12

#11 ER = 11

#12 II = 6

#13 HW = 1

#14 TS = NONE



# of Citations
SOP, MI, PSI, PHA were
68%
of citations last year
80
70
60
50
40
30
20
10
0
SOP
MI
PSI
PHA
MOC
Training
Cont.
PSSR
Audits
EP
ER
II
HW
TS

Order by Frequency

FEB 27, 2014 - MAR 30, 2015

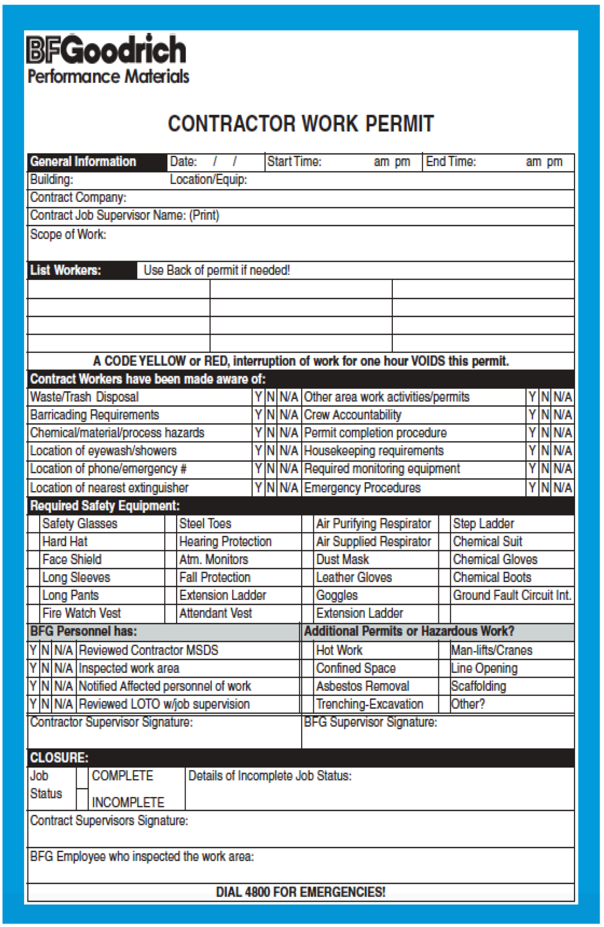
1910.119 J02
1910.119 J04IV
1910.119 L01
1910.119 N
1910.119 D03IB
1910.119 E01
1910.119 F03
1910.119 C01
1910.119 E05
1910.119 F01
1910.119 F04
1910.119 G01I
1910.119 I01
1910.119 J04I
1910.119 O01
1910.119 E03I
1910.119 G02
1910.119 J04II
1910.119 O04
1910.119 D02IA
1910.119 J05
1910.119 D02ID
1910.119 D03I

1910.119 E03
1910.119 E06
1910.119 F01IB
1910.119 F01IIIA
1910.119 F01IIIB
1910.119 H03II
1910.119 J04III
1910.119 C02
1910.119 D
1910.119 D02IC
1910.119 D03IC
1910.119 D03ID
1910.119 D03II
1910.119 E07
1910.119 F01I
1910.119 F01ID
1910.119 F01IE
1910.119 F01IIB
1910.119 F01IIID
1910.119 G03
1910.119 L03
1910.119 L04
1910.119 C03

1910.119 D02I
1910.119 D02IE
1910.119 D03IA
1910.119 D03IH
1910.119 D03II
1910.119 E03IV
1910.119 E03VII
1910.119 F01IA
1910.119 F01IC
1910.119 F01IF
1910.119 F01IG
1910.119 F01II
1910.119 F01IIIC
1910.119 H02II
1910.119 H03III
1910.119 H03II
1910.119 I02I
1910.119 I02II
1910.119 M01

Top 3 Best Practices

Contractor Work Permit



BFGoodrich
Performance Materials

CONTRACTOR WORK PERMIT

General Information	Date: / /	Start Time: am pm	End Time: am pm
Building:	Location/Equip:		
Contract Company:			
Contract Job Supervisor Name: (Print)			
Scope of Work:			

List Workers:	Use Back of permit if needed!	

A CODE YELLOW or RED, interruption of work for one hour VOIDS this permit.

Contract Workers have been made aware of:							
Waste/Trash Disposal	Y	N	N/A	Other area work activities/permits	Y	N	N/A
Barricading Requirements	Y	N	N/A	Crew Accountability	Y	N	N/A
Chemical/material/process hazards	Y	N	N/A	Permit completion procedure	Y	N	N/A
Location of eyewash/showers	Y	N	N/A	Housekeeping requirements	Y	N	N/A
Location of phone/emergency #	Y	N	N/A	Required monitoring equipment	Y	N	N/A
Location of nearest extinguisher	Y	N	N/A	Emergency Procedures	Y	N	N/A

Required Safety Equipment:			
Safety Glasses	Steel Toes	Air Purifying Respirator	Step Ladder
Hard Hat	Hearing Protection	Air Supplied Respirator	Chemical Suit
Face Shield	Atm. Monitors	Dust Mask	Chemical Gloves
Long Sleeves	Fall Protection	Leather Gloves	Chemical Boots
Long Pants	Extension Ladder	Goggles	Ground Fault Circuit Int.
Fire Watch Vest	Attendant Vest	Extension Ladder	

BFG Personnel has:				Additional Permits or Hazardous Work?	
Y	N	N/A	Reviewed Contractor MSDS	Hot Work	Man-lifts/Cranes
Y	N	N/A	Inspected work area	Confined Space	Line Opening
Y	N	N/A	Notified Affected personnel of work	Asbestos Removal	Scaffolding
Y	N	N/A	Reviewed LOTO w/job supervision	Trenching-Excavation	Other?

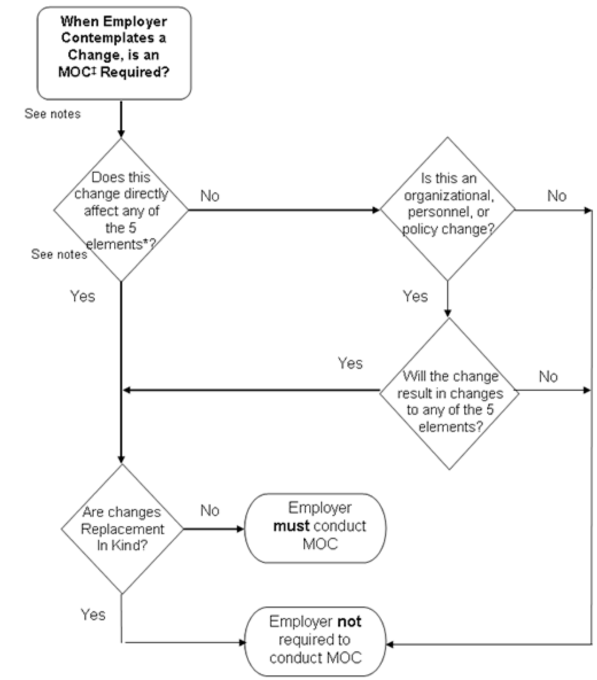
Contractor Supervisor Signature:	BFG Supervisor Signature:

CLOSURE:		
Job Status	COMPLETE INCOMPLETE	Details of Incomplete Job Status:
Contract Supervisors Signature:		
BFG Employee who inspected the work area:		

DIAL 4800 FOR EMERGENCIES!

Car Seal Program

MOC for Personnel & Staffing Changes



‡If at any point in the decision making process the employer decides not to implement the contemplated change, there is no requirement to conduct an MOC.

*Contemplated changes to the following 5 elements trigger MOC review in 1910.119 (l)(1), except for Replacement In Kind (RIK):
Process chemicals
Technology
Equipment
Procedures
Facilities

Contractor Work Permit

- Nested AND Un-Nested Contractors can pose a **higher risk** to themselves and the facility
  - Cultural Differences (they are in and out of many facilities)
  - Not as familiar with SWPs and ERPs
  - Usually hired to do hazardous activities that can impact process
- PSM & RMP require us to:
  - **INFORM** contractors of potential fire, explosion, or toxic release hazards related to their work and our process
  - **EXPLAIN** (i.e**. TRAIN**) applicable provisions of the EAP
  - **CONTROL** the entrance into a covered process, their presence/ work, and the exit of the contractor from the process
  - **EVALUATE** the performance of contractors in fulfilling their obligations

INFORMING of fire/explosion/toxic release hazards

- Usually a one-time, annual training session
- Most contractors work @ multiple facilities
  - Each one having different SWP, ERPs, etc.
- Often the contractors have never even heard of our chemical(s) or its hazard(s)
- Some contractors may have limited education or learning issues

EXPLAINING applicable provisions of the EAP

- How to report emergencies (phone #'s, radio channels, etc.)
- All the alarm tones/signals for the process AND facility
- Muster/Assembly Locations (may be different for each process)

CONTROLING the entrance, presence and exit

- Most have a sign-in/out process
- This process is often viewed as a "head-count" exercise and not a CONTROL mechanism
- Operators AND Contractors need to know the status of the process, as well as the work taking place within the process
- Communication between operators and contractors is KEY

EVALUATING performance of contractors

- Audit the contractors during their work and BEFORE they are permitted to leave the process (housekeeping, LOTO, etc.)
- 3-year PSM/RMP audit is NOT enough to meet this requirement

Solution = Contractor Work Permit

With a Contractor Work Permit

- **Contractors get…**
  - **DAILY hazard assessment** based on specific tasks and process hazards
  - **PPE Hazards Assessment** based on current working conditions and tasks
  - **Specific instructions on SWPs** for the tasks and process area
  - **Specific instructions on EAP** for the process
- **Facility gets…**
  - To provide **DAILY REFRESHER** training on applicable SWPs and EAPs
  - **Face-to-Face instruction** with contractor(s) on SCOPE of work and SAFETY CONTROLS
  - **CONTROL** over the contractor's entry/ presence/exit
  - **DAILY COMMUNICATION** with contractor supervision

BFGoodrich
Performance Materials

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Required Safety Equipment:			
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Contractor Supervisor Signature:	BFG Supervisor Signature:

CLOSURE:		
Job Status	COMPLETE INCOMPLETE	Details of Incomplete Job Status:

Contract Supervisors Signature:

BFG Employee who inspected the work area:

DIAL 4800 FOR EMERGENCIES!

What is the real advantage?

IMPROVED contractor safety!

Remember:

- Contractors working in our plant today may have
  - been trained 364 days ago
  - worked at dozens of other facilities, each one having their own set of SAFTEY CRITICAL RULES
- Is the contractor safety training material tied into the MOC process at your facility?
- With some facilities having multiple alarms, multiple assembly areas, and multiple emergency phone #'s ALL based on the unit the contractors working in… do we think an hour or two of training once a year is meeting our needs?

Car Seal Program

What is a Car Seal Program?

It is simply a device (i.e. valves, controls) management program that contains:

- List of safety critical devices;
- SAFE positions (could be either OPEN or CLOSED);
- Description of their location; and
- Identification of some type of “seal” that will prevent the device from being deviated from its SAFE position

Why would I ever need such a Program?

- **REQUIRED** by ASME Section VIII, Appendix M if your Relief System has intervening valves
- OSHA has issued PSM citations referencing ASME Section VIII
- Many facilities use “car seal” on valves identified in a PHA that if “deviated” would result in a release of the HHC/EHS or process deviation

Car Seal Program

Setting up a program:

1) Do **NOT** use your LOTO locks (violation of 1910.147(c)(5)(ii)
2) Use ASME Section VIII, Appendix M as a guide for the WRITTEN MANAGEMENT PROGRAM
3) COLOR CODE the seals: **GREEN** for OPEN, **RED** for CLOSED
4) REQUIRE the seal to actually prevent the deviation of the device (no "hanging" tags)
5) Program MUST contain a list of devices, location, SAFE state, and reason for inclusion
6) Manage program like an SOP with annual reviews, MOCs when a device is added or removed, or its SAFE state is changed
7) Add line item to the PSSR checklist, as well as include specific devices in START-UP SOPs

Car Seal Program

Setting up a program:

7) Include the car seal color coding in contractor safety training
8) Car Seal training should mirror LOTO program in respects to "authorized employees", "affected workers" and "other workers" so that anyone coming across a car seal KNOWS
9) Set time limits for deviation of these safety critical devices and if the time limit is exceeded, require a TEMPOARY MOC to allow the deviation to continue

12) First year – AUDIT QUARTERLY; based on results - establish program audit frequencies
13) Implement a VALVE DEVIATION BOARD in the control room so it is OBVIOUS when a valve is deviated and which one and why

Spot the Valve(s)

MOC for Personnel & Staffing Changes

Compliance View

- One of EPA's top RMP citations is "not revising the RMP to reflect the new Emergency Contact within 30 days of the change"
  - MOC on personnel changes will CATCH this!
- OSHA 2009 memorandum to RA's on "Management of Organizational Change"

Standard Interpretations - Table of Contents

- **Standard Number:** 1910.119

March 31, 2009

MEMORANDUM FOR: REGIONAL ADMINISTRATORS

THROUGH: DONALD G. SHALHOUB
DEPUTY ASSISTANT SECRETARY

FROM: RICHARD E. FAIRFAX, DIRECTOR
DIRECTORATE OF ENFORCEMENT PROGRAMS

SUBJECT: Management of Organizational Change

This memorandum addresses the application of 29 CFR 1910.119 (l), Process Safety Management (PSM) - Management of Change (MOC), to covered processes potentially impacted by changes in facility organization, staffing, and policies (Organizational Changes). It does not add to or modify the types of changes subject to MOC; rather, it is intended to increase CSHO awareness of potential sources of changes covered under the PSM standard. The MOC provisions of the PSM standard apply only to changes, including organizational changes, that impact safety in PSM covered processes.

MOC for Personnel & Staffing Changes

Highlights from OSHA's 2009 RA Memorandum

- Some organizational changes, such as changes resulting from:
  - Mergers/Acquisitions
  - Reorganizations leading to changes in personnel and #'s of personnel on shift
  - Budget revisions

  may affect PSM at the plant level and would therefore trigger a PSM MOC procedure.
  - Some examples of these include:
    - personnel changes, including changes in staffing levels, staff experience, or contracting out that directly impact PSM covered processes
    - policy changes such as budget cutting that impact PSM covered processes

CSHOs should consider issuing a citation for a violation of 29 CFR 1910.119(l) whenever an employer has made a change, or is in the process of making a change, to process chemicals, technology, equipment, procedures and facilities, … As discussed above, ***this applies to such changes even when they result from organizational, personnel, or policy changes****.*

MOC for Personnel & Staffing Changes

Examples of Personnel Changes:

- Updating the RMP within 30 days when the "Emergency Contact" changes
- Updating the RMP when the "person responsible" changes
- Updating your "Respiratory Protection Program Administrator"
- Updating your EAP with "name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan"

Examples of Staffing Changes

- Going from 5 operators to 4 per shift may change your ESD SOPs
  - 1910.119(f)(1)(i)(D)… the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner.
- Going from 8 hr. shift to 12 hr. shifts changes our PELs (Chemical and Noise)
- Changes to "minimum ERT staffing" for tasks such as PRCS Rescue, HAZWOPER, Fire Brigade

THANKS for your time and attention

Now we will take any QUESTIONS or COMMENTS

Jonathan Zimmerman, CSP
EHS Manager
Kellogg's

Bryan Haywood, MS
Founder & CEO
SAFTENG.net
The Network for Safety Professionals around the world!