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WHITEPAPER

BEST PRACTICES FOR IMPLEMENTING AN EFFECTIVE PSM/RMP PROGRAM



***PSM AND RMP SHARE
A COMMON GOAL OF
ENSURING SAFETY AND
PREVENTING ACCIDENTS.***

BEST PRACTICES FOR IMPLEMENTING AN EFFECTIVE PSM/RMP PROGRAM

Preventing the unwanted release of highly hazardous chemicals is of critical importance for protecting both employees and the environment. Compliance with safety regulations is crucial. But understanding the requirements can be overwhelming.

OSHA's Process Safety Management (PSM) and the Environmental Protection Agency's (EPA) Risk Management Program (RMP) are the two main regulatory agencies involved in preventing the accidental releases of extremely hazardous, toxic, and flammable substances. It's up to employers to comply with those requirements and implement the appropriate programs.

UNDERSTANDING THE BASICS: A COMPARISON BETWEEN OSHA'S PROCESS SAFETY MANAGEMENT AND EPA'S RISK MANAGEMENT PROGRAM

OSHA's PSM and EPA's RMP both require facilities to develop and implement comprehensive safety programs. They aim to prevent or minimize the consequences of catastrophic releases of highly hazardous chemicals. PSM and RMP share a common goal of ensuring safety and preventing accidents.

The key difference between the two programs is that PSM primarily focuses on protecting workers and preventing workplace accidents, while RMP focuses on the protection of public health and the environment.



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OSHA's Process Safety Management (PSM) standard: The PSM standard was implemented by OSHA in 1992 as an additional requirement to the Occupational Safety and Health Act. It requires employers with a process involving highly hazardous chemicals at or above a certain threshold quantity to implement a comprehensive management program to help mitigate risk. The goal of PSM is to identify potential hazards, ensure safe operating procedures, and enhance emergency response capabilities.

EPA's Risk Management Program (RMP) rule: The RMP rule, created by the Environmental Protection Agency (EPA) after passage of the Clean Air Act Amendments of 1990, requires owners and operators of a facility that manufactures, uses, stores, or otherwise handles more than a threshold quantity of a listed regulated substance in a process to develop and implement a risk management program.

CRITICAL COMPONENTS OF PSM AND RMP

Employers who are required to comply with OSHA's Process Safety Management (PSM) program must complete the following steps:

- 1.** Complete a written Process Safety Information document concerning process chemicals, process technology, and process equipment.
- 2.** Conduct a process hazard analysis (PHA) which is an organized and systematic way of identifying and analyzing the significance of potential hazards associated with the processing or handling of highly hazardous chemicals.
- 3.** Develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process.
- 4.** Provide training to all appropriate employees involved in the process that emphasizes the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.



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5. Perform a pre-startup safety review for new facilities and for modified facilities when the modification is significant enough to require a change in the process safety information.
6. Establish and implement an emergency action plan for the entire plant that also includes procedures for handling small releases.

Although the specific requirements vary and are based on the operations and situation of a given facility, the owner or operator of a process covered under the Risk Management Plan (RMP) rule must complete the following steps *in addition* to those listed in PSM requirements:

1. Follow management systems requirements.
2. Conduct an off-site analysis.
3. Review five-year incident history.
4. Evaluate worst-case release scenarios.
5. Plan coordination with local emergency planning committee (LEPC).
6. Participate in information sharing to the public.
7. Submit facility registration.
8. Follow risk management plan requirements.
9. Follow reporting requirements.
10. Conduct response drills and exercises.
11. Comply with regulatory audit requirements.

BEST PRACTICES FOR IMPLEMENTATION (APPLICABLE TO PSM AND RMP)

Regardless of whether your company is required to implement PSM or RMP (or in some cases both), it's important to establish clear goals, timelines, and milestones for completion.



By defining specific goals and objectives that align with regulatory requirements, a comprehensive implementation plan serves as a roadmap to success.

Having a solid plan in place is foundational to your success. This involves breaking down the implementation process into manageable steps, assigning tasks, and ensuring accountability among your team.

Organizations should outline clear goals, schedule timelines, and set milestones to track progress effectively. By defining specific goals and objectives that align with regulatory requirements, a comprehensive implementation plan serves as a roadmap to success.

Taking a proactive approach not only enhances the efficiency of PSM/RMP implementation, but also fosters a culture of continuous improvement within the organization.

Here's an example of a high-level execution plan that can help you implement an effective PSM or RMP program:

1. Setting a goal to complete a process hazard analysis within the next three months.
2. Creating a timeline for all involved employees with specific tasks and duties.
3. Identifying milestones along the way.

One way that employers can stay on track while implementing PSM or RMP is by leveraging software tools that can help streamline critical aspects of the process. Utilizing such tools can enhance efficiency, ensure accuracy, and alleviate some of the complexities of PSM and RMP.

You may also consider working with a consulting team that has experience auditing and implementing both process safety management and risk management programs.

No matter which route you take, it's important to stay organized and maintain consistency throughout the implementation process so that you don't miss any of the required steps or overlook any potential hazards or sources of risk within your process.



***HAVING A WORKFORCE
THAT IS NOT ONLY
TRAINED BUT ALSO
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COMPLEXITIES OF
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IS HIGHLY BENEFICIAL.***

EMPLOYEE INVOLVEMENT

One of the critical steps of both PSM and RMP is to involve employees in the implementation process. In fact, it is a required aspect of both programs.

Employees possess valuable insights about the daily operations, equipment, and potential hazards throughout your facility. Their feedback and involvement during hazard assessments and process analyses helps ensure a comprehensive approach to managing risk.

Involving your employees also helps foster a positive safety culture. There is increased ownership and accountability, and employees are more likely to follow the safety procedures on a day-to-day basis if they were involved in their development.

EMPLOYEE TRAINING

It's important to recognizing the critical role that employees play in the success of these safety initiatives. Having a workforce that is not only trained but also competent in navigating the complexities of hazardous materials is highly beneficial.

Training content should be customized to address the unique aspects of each role within your workforce. This helps ensure that employees are equipped with the knowledge and skills needed to execute their tasks safely and effectively.

Regular training updates and refresher courses should also be given, as they serve as proactive measures to reinforce key safety protocols.



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Regulatory bodies, neighboring communities, and industry partners bring diverse insights, which contributes to comprehensive hazard assessments and effective risk management strategies.

INVOLVING EXTERNAL STAKEHOLDERS

For processes that are covered under the RMP rule, coordinating with local emergency responders is not only a good idea, but also part of the basic requirements.

This kind of communication and coordination is a best practice for any facility that involves highly hazardous chemicals. Therefore, employers who are only covered under OSHA's PSM standard should also consider involving external stakeholders at some point in the development of their PSM program.

Regulatory bodies, neighboring communities, and industry partners bring diverse insights, which contributes to comprehensive hazard assessments and effective risk management strategies.

A collaborative approach with external stakeholders fosters transparency, builds trust, and displays a shared commitment to safety and environmental responsibility.

THE PATH FORWARD: IDENTIFYING GAPS AND AREAS OF OPPORTUNITY

When it comes to managing highly hazardous chemicals, the effective implementation of OSHA's PSM and the Environmental Protection Agency's RMP is critical.

The significance of preventing unintended releases goes beyond compliance; it is a social and moral responsibility to safeguard the well-being of employees, the environment, and the surrounding communities.

Navigating the complexities of PSM and RMP can be overwhelming. Yet it is the responsibility of employers and facility owners/operators to adhere to the requirements and implement the appropriate programs. You'll need to identify any existing gaps that may interfere with the successful implementation of your program and develop a plan to overcome them.



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The path forward may not be an easy one. But it is worth taking. And the journey to compliance involves meticulous steps that cannot be missed. Recognizing this, organizations must develop a systemic approach that establishes clear goals, timelines, and milestones for completion.

BREAKING DOWN THE IMPLEMENTATION PROCESS INTO MANAGEABLE STEPS, ASSIGNING TASKS, AND ENSURING ACCOUNTABILITY AMONG THE TEAM CAN LEAD TO A SUCCESSFUL IMPLEMENTATION OF BOTH PSM AND RMP.

Embracing technology becomes a cornerstone in this journey, as it can streamline data management, incident reporting, and compliance tracking. The integration of digital tools not only enhances efficiency but also reduces the risk of missing critical steps along the way.

At the end of the day, ensuring compliance with the regulatory requirements not only protects your employees, but your facility, your community, and the good name of your company.

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ABOUT THE AUTHOR



GINA GODEEN **J. J. KELLER & ASSOCIATES, INC.**

Gina Godeen is an Editor at J. J. Keller & Associates, Inc. who joined the EHS Editorial team in 2023. Her commitment to safety and her talent in making complex regulations easy to understand make her a valuable asset for our customers.

Gina has 10 years of hands-on experience as a safety manager in the construction, mining, and manufacturing industries. Her strengths and interests include writing about safety topics such as Lockout/Tagout (LOTO), Personal Protective Equipment (PPE), confined spaces, and working from heights. You may have seen her work published in OHS Online and EHS Today.

Gina's safety journey began with the completion of her master's degree in environmental health and safety from the University of Minnesota Duluth in 2014.

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