

# CalARP/RMP/PSM

CUPA, EPA, OSHA Inspections  
Audits, Revalidations...

Or Can I Ever do Real Work?

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Things to do in the first year (and every following year):

- Daily inspections
- Weekly inspections and tests
- Monthly inspections and tests
- Quarterly inspections and tests
- Semi-annual inspections and tests

Document these and file them where they can be found for Audits & Inspections



If you are covered under the RMP or PSM Programs –  
After the first year:

- Annual reviews
- Triennial reviews and Audits
- 5-Year Revalidations and Audits
- EPA or OSHA Inspections any time



## Annual things to do:

- Review Standard Operating Procedures
- Review Process Safety Information
- Review Emergency Response Plan
- Review RMP Program elements
- Hold annual Emergency Response training



In addition to the annual list,  
Every 3 Years:

- RMP Compliance Audit
- Operator Refresher training
- CUPA inspection (may not be coincident)

Note that refresher training may be held more often than 3 year interval



In addition to the annual list,

Every 5 years:

- RMP/PSM Program Re-Submission
- Mechanical Integrity Audit for ammonia systems



On your 15<sup>th</sup> anniversary:

- Do all the Annual list
- Do all the triennial list
- Do all the 5-year list

If you first submitted in 1999, that is next year for you –  
Make sure it is in your budget!



# For the graphically oriented:

THE RMP/PSM ACTIVITY MATRIX																			
	-1999	Year 1 (2000)	Year 2 (2001)	Year 3 (2002)	Year 4 (2003)	Year 5 (2004)	Year 6 (2005)	Year 7 (2006)	Year 8 (2007)	Year 9 (2008)	Year 10 (2009)	Year 11 (2010)	Year 12 (2011)	Year 13 (2012)	Year 14 (2013)	Year 15 (2014)	Year 16 (2015)	Year 17 (2016)	et cetera
Initial RMP Submission	X																		
Annual SOP Review		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Annual PSI Review		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Annual ERP Review		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Annual ERP Training		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Annual Program Review		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
3-Year RMP Audit				X			X			X			X			X			X
3-Year* Refresher Training				X			X			X			X			X			X
3-Year+ County Audit				X			X			X			X			X			X
5-Year Re-Submission						X					X					X			
5-Year NH <sub>3</sub> M.I. Audit						X					X					X			
Region 9 EPA Inspection	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
CalOSHA Inspection	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?





Oh, by the way ...

Your CUPA comes by every 3 years or so, BUT

Region 9 EPA can drop by any time, and

CalOSHA can drop by any time

While you may be under the reporting threshold,  
**YOU ARE COVERED!**



## Annual Events – SOP Review

Every Standard Operating Procedure gets reviewed

- Do they match the present equipment?
- Are they what the operators actually do?
- Do operators have suggestions for changes?
- Reviewed by person named in RMP Program?

Sign and date something:

- Each SOP master copy or
- A master list of SOPs



# Annual Review – Process Safety Information

Check to see:

- Are P&IDs up to date?
- Locations known for
  - Ventilation calculations
  - Relief system calculations
  - All equipment manuals

Document that the review took place



# Annual Review – Emergency Response Plan

The review should include:

- Named personnel are correct
- Contact information is correct
- Evacuation Plan and Maps correct
- IC personnel are trained (documented)



# Annual Emergency Response Training

At least annually:

- Do Refresher Training for all hands
- Hold an evacuation drill and record:
  - Date and time of drill
  - Where employees assembled
  - How long to clear the building
  - How long to take attendance and report
  - Any suggested changes in procedure



## Annual RMP Program review

Are all required program elements still valid:

- Management description and Org Chart?
- PHA follow-up on schedule or complete?
- Maintenance and Training Programs OK?
- Management of Change being used?
- Incident Investigation Program working?
- Safe Work Practices in place?



## 3-Year RMP Compliance Audit

- Done by a “knowledgeable person”
- Written report of findings
- List of recommended changes
- Management follow-through on suggestions
- Employees informed of Audit results



## 3-Year CUPA Audit

- Not the same as Compliance Audit
- May not be on the same schedule





## 3-Year Refresher Training

- Required at least every 3 years
  - May be shorter than 3 year interval
  - Ask operators about interval (document)
- Defined by facility to cover facility needs
  - None is not an option
  - Repeat initial training
  - SOP, P&ID review
  - Practical demonstration



## 5-Year RMP Re-Submission

Every 5 years you must:

- Revalidate the PHA or Hazard Review
- Revalidate the Offsite Consequence Analysis
- Update RMP eSubmit if applicable
- Revise Program text as needed
- Sign Registration and Certification statements
- Turn in to CUPA on time



## And on your 15<sup>th</sup> Year

Things to do in the fifteenth year:

- Daily inspections
- Weekly inspections and tests
- Monthly inspections and tests
- Quarterly inspections and tests
- Semi-annual inspections and tests



## And on your 15<sup>th</sup> Year

Annual things to do:

- Review Standard Operating Procedures
- Review Process Safety Information
- Review Emergency Response Plan
- Review RMP Program elements
- Hold annual Emergency Response training



## And on your 15<sup>th</sup> Year

From the 3-Year List:

- RMP Compliance Audit
- Operator Refresher training
- CUPA inspection (may not be coincident)



## And on your 15<sup>th</sup> Year

Every 5 years:

- RMP/PSM Program Re-Submission
- Mechanical Integrity Audit for ammonia systems



***Holy Cow!  
When do I  
Do REAL work  
In the 15<sup>th</sup> Year?***



## BUT I NEED TO MAKE MONEY FOR THE COMPANY

- By maintaining your RMP/PSM program, you will reduce time and money spent:
  - CUPA inspections will be quicker and more friendly
  - Same for other regulatory inspections
  - Compliance Audits are easier
  - 5-Year Re-submissions are easier





## Other Benefits

- Fewer expensive Enforcement Actions
- Fewer Violations and Fines
- More regulator confidence in your Company
- No massive deadline struggles for RMP/PSM



IT CAN BE DONE

PLAN YOUR WORK

AND

WORK YOUR PLAN



## Don't (try to) do it all at once

- Review a couple SOPs and RMP Programs a month
  - Put them on a calendar and follow the schedule
  - Involve the operators in reviews
- Review and file your daily logs and inspection reports at least once a month
- Delegate if you can



## On your 15<sup>th</sup> Year

- Don't forget to put extra money in the budget
- If you use a consultant, involve them early
  - 2014 is going to be a busy year for consultants
  - Call 4-6 months before your due date
  - A last-minute effort is not a quality effort



# In Conclusion

PLAN YOUR WORK  
AND  
WORK YOUR PLAN



Condor  
Wishes You  
A Happy 15<sup>th</sup> Anniversary!

(please call early)

