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Three Ways to Handle PSM/RMP Compliance with Limited Staff

Hiring and maintaining qualified staff can be an extremely difficult challenge in today's world. With limited staff in place, time for activities such as maintaining compliance with OSHA's Process Safety Management (PSM) program or the EPA's Risk Management Plan (RMP) can be at a premium. Yet just because your organization may be operating with fewer personnel does not mean that the clock stops on PSM/RMP compliance. Below, Hixson provides three ways your organization can maintain compliance even when personnel are stretched thin:

1. Distribute the workload. Perhaps the most effective way to keep up with compliance is to push out ongoing task requirements to those who are directly responsible. In Hixson's experience, we have found that if the entirety of the PSM/RMP reporting is on the shoulders of just one person, there will likely be gaps in the data. Instead, delegate the burden as part of the management of the program. For example, ask Human Resources (HR) to handle the employee participation provisions, have the Safety Department responsible for emergency planning and training, have Engineering handle Management of Change, and so on.

EXPERIENCE IN BRIEF

In the list below are some of the key PSM/RMP Audit dates to remember. For a complete list, contact Hixson.

Task	Timing
Document review & revisions of the PSM/RMP Program	Annually
PHA Revalidation of entire system	5 Years
Conduct PHA revalidations	5 Years
Conduct SOP revalidations	Annually
Refresher Training for refrigeration personnel	3 Years
Mechanical Integrity Audit by Qualified Consultant	5 Years
Cancelled/Expired Hot Work Permits to allow for review of program	1 Year
Authorized contractor evaluations	1 Year
Document a PSM/RMP Compliance Audit	3 Years
Correct the RMP when there is a change in Emergency Contact information	1 Month
Correct the RMP when there is a 5 Year Accident History Event	6 Months
De-register a site with USEPA when RMP is no longer applicable	6 Months

2. Conduct routine assessments at least annually. There are many “time-sensitive” requirements within OSHA’s PSM and EPA’s RMP standards (See Experience in Brief Below). Per 40 CFR 68.15, a management system must be in place to oversee the implementation of the program. This system must identify the implementing individuals or titles. It is highly recommended that the management system includes an assessment of the entire program on at least an annual basis. This assessment is to verify that your program continues to represent the work practices currently in place.

3. Hire an external audit reviewer. Consider hiring a third-party resource to periodically review your PSM/RMP program for compliance. It is a good idea to have a fresh set of eyes providing an unbiased gap report prior to the required three-year Compliance Audit. This review, which could be used as the recommended assessment listed above, can alleviate unnecessary stress when the required audit is due.

Remember too that the PSM/RMP is just one of many programs with compliance requirements. The above tips will help with any program that has time-driven deliverables that must be completed.

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