

## GCAP Ammonia PSM/RMP Program Activities

(provided as a training example only)

This document summarizes how GCAP complies with the requirements of the Occupational Safety and Health Administration’s (OSHA) Process Safety Management of Highly Hazardous Chemicals regulation at 29 CFR §1910.119 which is commonly known as PSM and the similar Environmental Protection Agency’s (EPA) Chemical Accident Prevention Provisions regulation at 40 CFR §68, which is commonly known as the Risk Management Plan (RMP).



GCAP has created a combined PSM/RMP Program to combine compliance efforts for both regulations. That program is broken into several elements which have guidelines describing GCAP’s written plan of compliance for each element. The Chief Executive Officer has overall responsibility for the PSM/RMP Program; however the responsibility for implementing the program has been delegated as follows:

Program Element	Responsible Person	Responsibilities under the Program (examples only)
<b>Overall PSM/ RMP Management System</b>	PSM Coordinator with the assistance of the Facility Manager and the PSM team.	Ensures program elements are in place, in use, and effective.
<b>Risk Management Plan (RMP)</b>	PSM Coordinator with the assistance of the Chief Engineer	Responsible for preparing and submitting the RMP.  Ensures that the RMP is reviewed and updated at least every five years.  Ensures that the RMP is updated if a major change is made to the ammonia refrigeration system.  Ensures that an initial hazard assessment is conducted for the ammonia refrigeration system.  Ensures that the hazard assessment is reviewed and updated at least every five years.  Ensures that the hazard assessment is updated if a change impacts the distance to the endpoint by a factor of two in either direction.  Ensures that the hazard assessment is updated if an incident results in off-site consequences or is of a reportable quantity.

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<b>Process Safety Information</b>	Chief Engineer with the assistance of the PSM Coordinator and the PSM team.	<p>Ensures that the process safety information manual is prepared and maintained.</p> <p>Ensures that the manual is updated when a change is made to the ammonia refrigeration system.</p>
<b>Employee Participation</b>	Facility Manager with the assistance of the PSM Coordinator and the PSM team.	<p>Ensures that employees are involved in establishing and implementing the PSM/RM program.</p> <p>Ensures that every employee is given an overview of the PSM/RM program during their new employee orientation.</p> <p>Ensures that employees receive regular updates on the PSM/RM program.</p> <p>Ensures that all employees have complete access to the PSM/RM program.</p>
<b>Process Hazard Analysis</b>	PSM Coordinator with the assistance of the Chief Engineer and the PSM team.	<p>Ensures that process hazard analyses are performed per the written guidelines.</p> <p><b>Ensures that all recommendations identified during the analysis are resolved in a timely manner and that resolutions are documented.</b></p> <p><b>Ensures that the process hazard analysis is revalidated at least once every five years.</b></p> <p>Ensures that a process hazard analysis is conducted when a major change is made to the ammonia refrigeration system.</p>

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<p><b>Operating Procedures</b></p>	<p>Chief Engineer with the assistance of the PSM Coordinator and the PSM team.</p>	<p>Ensures that the written operating procedures are developed and maintained for the ammonia refrigeration system.</p> <p>Ensures the procedures are reviewed on an annual basis to ensure they are accurate and current.</p> <p>Ensures that the procedures are updated when a change is made to the ammonia refrigeration system.</p>
<p><b>Operator Training</b></p>	<p>Chief Engineer with the PSM Coordinator and the PSM team.</p>	<p>Ensures that the personnel who operate and maintain the ammonia refrigeration system are trained and qualified.</p> <p>Sets frequency of refresher training (with employees)</p> <p>Ensures that new employees receive initial training.</p> <p><b>Ensures refresher training is conducted.</b></p> <p>Ensures training is conducted when changes are made to the ammonia refrigeration system.</p>

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<b>Contractor Safety</b>	Chief Engineer with the assistance of the PSM Coordinator and the PSM team.	<p>Identifies contractors who are covered by these procedures.</p> <p>Works with the other departments to evaluate contractors and prepare an approved bid list on an annual basis.</p> <p>Participates in pre-bid and post-bid meetings with contractors.</p> <p>Ensure that only contractors on approved bid list perform work on or near the ammonia system.</p> <p>Periodically audits the performance of the contractors.</p>
<b>Pre-Startup Safety Review</b>	PSM Coordinator with the assistance of the Chief Engineer and the PSM team.	<p>Ensures that pre-startup safety reviews are conducted to ensure that: Modifications are installed in accordance with approved design standards</p> <p>New procedures are developed prior to start-up of a modified facility or that existing procedures are modified accordingly, and that all personnel are trained on the procedures.</p>
<b>Hot Work Permit</b>	Chief Engineer with the assistance of the PSM Coordinator and the PSM team.	Ensures that the hot work procedures are followed at the facility.

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<b>Incident Investigation</b>	PSM Coordinator with the assistance of the Chief Engineer, the Facility Manager and the PSM team.	<p>Determines whether an incident requires investigation and establishes the team leader/team membership.</p> <p>Reviews incident investigation report.</p> <p>Ensures that all recommendations identified during the investigation are resolved in a timely manner and that the resolutions are documented.</p>
<b>Mechanical Integrity</b>	Chief Engineer with the assistance of the PSM Coordinator and the PSM team.	<p>Ensures that the requirements for the mechanical integrity program are followed for the ammonia refrigeration system.</p> <p>Ensures that the maintenance procedures are prepared and implemented.</p> <p>Ensures that inspection and testing of the equipment in the ammonia refrigeration system is planned, scheduled, recorded, and managed according to good engineering practices.</p> <p>Establishes and implements procedures to ensure that deficiencies identified are dealt with in a timely manner.</p> <p>Ensures that the quality assurance procedures are implemented.</p>
<b>Management of Change (MOC)</b>	Chief Engineer with the assistance of the PSM Coordinator and the PSM team.	<p>Reviews and classifies a modification as a “change” or a “replacement in kind.”</p> <p>Classifies a change as “minor” or “major” and indicates whether it is permanent or temporary.</p> <p>Coordinates/conducts safety and health review using and appropriate technique.</p> <p>Ensures that recommendations identified during the safety and health review are reviewed and those which are accepted are implemented prior to start-up.</p> <p>Ensures that the PSM/RM manuals are updated.</p>

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<b>Emergency Response Plan</b>	PSM Coordinator with the assistance of the Chief Engineer, Facility Manager and the PSM team.	<p>Responsible for the development and implementation of the emergency/crisis plan.</p> <p>Ensures that the plan is coordinated with the Local Emergency Planning Committee (LEPC).</p> <p>Ensures that the plan is reviewed and updated on a regular basis.</p> <p>Ensures that the emergency response training is conducted on a regular basis.</p> <p>Ensure that emergency response drills are conducted on a regular basis.</p>
<b>Compliance Audits</b>	PSM Coordinator with the assistance of the Chief Engineer and Facility Manager and the PSM team.	<p>Ensures that a compliance audit is conducted for the ammonia refrigeration system at least once every three years.</p> <p>Certifies that the compliance audit complies with the provisions of OSHA's PSM standard And EPA RM Program Regulation.</p> <p>Ensures that all recommendations identified during an audit are resolved in a timely manner and that the resolutions are documented.</p>
<b>Trade Secrets</b>	PSM Coordinator and the PSM team.	<p>Responsible for controlling access to PSM information at the facility.</p> <p>Determines whether any PSM information should be designated as trade secret information.</p> <p>Responsible for specifying the rules and procedures that should be followed to access the trade secret information, including the use of any confidentiality agreements.</p>
<p>Element Guidelines provide detailed information on the responsibilities under the program. The items presented here are meant to represent examples only!</p>		

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Responsible Person	Name	Office Phone Number	Cell Phone Number
Facility Manager	John Whorfin	609-555-1984 x101	609-555-1492
Chief Engineer	John Smallberries	609-555-1984 x107	609-555-1337
PSM Coordinator	John Bigboote	609-555-1984 x113	609-555-1776
Maintenance Manager	John Yaya	609-555-1984 x163	609-555-1010
Safety Manager	John Emdall	609-555-1984 x160	609-555-1516
1 <sup>st</sup> Shift PSM Team Member	John Parker	609-555-1984 x99	609-555-6871
2 <sup>nd</sup> Shift PSM Team Member	John Littlejohn	609-555-1984 x99	609-555-5784
3 <sup>rd</sup> Shift PSM Team Member	John Manyjars	609-555-1984 x99	609-555-0451

**Lines of Organization and Authority**

