



Refining Process Safety Management National Emphasis Program

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Marathon

OSHA PSM NEP – Non VPP Facilities



- ◆ Typically Lasted 6 months / On Site 35 – 65 Days
 - Over 100 - 250 document requests
 - Over 80 employee interviews
 - Approximately 5 full time employees to manage NEP



OSHA PSM NEP – VPP Facilities



- ◆ NEP as part of VPP Recertification
 - 3 auditors for 3 days
 - 51 questions from static list (sent in ahead of time)
 - 12 questions from dynamic list
 - Process evolving to dedicated 5 day audit

- ◆ NEP as part of VPP Application
 - NEP questions similar to Recertification Process
 - Units selected – FCC & Propylene
 - 1 month on site

OSHA PSM NEP



◆ PHA

- Documentation and basis for standard facility siting & human factors checklist
- Documentation on revalidations
- Documentation on low hazard consequences

◆ Mechanical Integrity - Equipment Deficiencies

- Gas detectors
- Building pressurization
- Relief Valve Setting



OSHA PSM NEP



- ◆ Employee participation plan
- ◆ PSI - P & ID's (Numbering of RV, Motors, etc.)
- ◆ Recommendations closure in timely manner
- ◆ Clear operating limits in operating procedures
- ◆ Area Electrical Classification
 - Building pressurization



OSHA PSM NEP

- ◆ Warning contractors of process hazards

Methods and Documentation

- ◆ Incident Investigations

- Documented initiation within 48 hours
- Contractor involvement



OSHA PSM NEP



◆ Safe Work Practices

- Lockout / Tagout
- Hot Work
- Vehicle entry – Hot Work
- Process Unit Entry Requirements

◆ MOC

- Documentation of hazard reviews
- Follow through on temp MOC requirements

