

## **New Ideas and Solutions for OSHA Compliance**

### **1. Publish and update a critical documents locator**

When regulatory agencies arrive onsite they typically want to see a number of documents relative to compliance with Federal and State Health, Safety and Environmental Regulations. Many companies often struggle to provide the requested documents in a timely manner, as they are often located in numerous places. Firms should consider publishing and updating a documents locator such as the sample shown in Attachment 1.

### **2. Involve hourly employees in the OSHA Process Safety Management (PSM) / EPA Risk Management Program (RMP) Compliance Audits**

The PSM and RMP standards mandate that compliance audits be conducted once every three (3) years. Involving hourly employees in the process provides numerous benefits including:

- Participants have a greater understanding of the depth of the regulations
- Demonstration to employees that they are stakeholders in the process
- Employees are better equipped to explain to the regulators the company's policies and procedures when inspections occur

### **3. Improve the value of your Process Hazard Analyses (PHA's)**

Consider using multiple methodologies for conducting your PHA's. While Hazard and Operability Reviews (HAZOP's) provide an in-depth review of a covered process, teams sometimes get tunnel vision and fail to see the big picture. HAZOP's should be supplemented with What-If checklists to focus on such critical issues as the need for:

- Area gas detection equipment
- Remotely operated isolation valves at battery limits
- Safety systems such as vent stacks and flare systems which are often overlooked

Prior to starting a PHA, show one of the Chemical Safety Board's Incident Investigation DVD's on processes similar to the one(s) under review.

Have the PHA team complete a walk-through of the covered process with attention to:

- Discharge points for relief valves
- High point vents and low point drains
- Critical piping that may be subject to vehicular damage
- Hoses and expansion joints not shown on the P&ID's
- Evacuation routes
- Temporary buildings

Develop and publish a system for risk ranking that includes credit factors for safeguards. Many firms estimate probability and consequences but do not have any guidelines on the value of the proposed safeguard. Keep in mind an administrative control may not be nearly as effective as an engineered control. In some cases, multiple controls may be needed to achieve an acceptable level of risk.

#### **4. Develop and implement a Work Permit Audit Process**

Work permits including Lockout / Tagout, Confined Space Entry, Hot Work, Line Breaking and Vehicle Entry are the cornerstones of an effective safety program. Our audits consistently show breakdowns in these critical systems due to the lack of observable and measurable audit processes in place. Each site should develop an objective audit process to identify the strengths and weaknesses of the work permit system. It should include an evaluation of the equipment owner's responsibilities as well as the permit accepters. It should clearly distinguish between life critical issues and clerical ones.

#### **5. Re-evaluate your training methods**

Many companies are primarily using computer-based training to allow them greater flexibility and reduce costs. However, such one-way communication may not always be effective. Many firms are using e-mail and computerized employee notifications to communicate changes to the process. Interviews of hourly employees frequently show that they cannot gain access to the needed information as the network is too cumbersome to navigate or they can't remember their current passwords as they are changed too frequently.

#### **6. Use the Management of Change (MOC) process for personnel changes**

Although the PSM Standard does not specifically indicate that changes to personnel require an MOC review, we frequently find that employee safety is not adequately considered when downsizing an operation or implementing lean manufacturing concepts.

#### **7. Implement a Supervisor / Team Leader Development Program**

First line supervisors and team leaders are charged with training, coaching and counseling personnel as well as enforcing company policies and procedures, but many companies fail to give them the necessary training. Managers often assume skilled technicians and maintenance personnel have these skill sets, but most do not. Consider developing a Supervisor / Team Leader Development Program that includes:

- Need for An Effective Safety Program and the Supervisor's / Team Leader's Role
- Effective Communication and Leadership Skills
- Hazard Recognition, Evaluation and Control
- Introduction to Incident Investigation and Root Cause Analysis
- Pre-Job and Task Planning using Job Hazard Analysis and Task Hazard Analysis
- Effective Delivery of On-the-Job Training
- Analyzing Performance Problems
- Recognizing and Dealing with the Signs and Symptoms of a Troubled Employee
- Preventing Sexual and Other Forms of Harassment
- Conducting Effective Safety Meetings



**ATTACHMENT 1  
REGULATORY DOCUMENTS LOCATOR**

**Selected Non-PSM Documents and Locations**

<b>Element</b>	<b>Document</b>	<b>Location</b>	<b>Responsible Person</b>
<b>Medical &amp; Exposure Records</b>	Physicals & Physician's Opinion Letters		
	Audiograms		
	Respiratory Protection Questionnaires		
	I.H. Monitoring Results		
	Respiratory Fit Test Records		
	Area Noise Level Readings		
	OSHA Injury-Illness Reports		
	OSHA Logs & Summaries		
<b>Safety Equipment Inspection Records</b>	Fire Extinguishers		
	Sprinkler & Deluge Systems		
	Post Indicator Valves		
	SCBA's & Hoseline Respirators		
	Exhaust system velocity tests		
	Safety Shower / Eyewash		
	Fall Arrest Devices		

<b>Element</b>	<b>Document</b>	<b>Location</b>	<b>Responsible Person</b>
<b>Accident / Incident Investigation Reports</b>	Near Miss Events		
	Personnel injuries		
	Fire / property damage		
	PSM-related incidents		
	EPA-related incidents		
	Auto accidents		
	DOT-related incidents		
<b>Non-PSM Maintenance Inspection Records</b>	Overhead cranes and hoists		
	Mobile cranes		
	Rigging equipment		
	Forklifts		
	Trackmobiles/Railroad Locomotives		
<b>Insurance Company Inspection / Audit Reports</b>	Property		
	Casualty		
	Boiler / Machinery		
<b>State &amp; Federal Regulatory Operating Permits</b>			
<b>State &amp; Regulatory Agency Inspection / Audit Records</b>			

<b>Element</b>	<b>Document</b>	<b>Location</b>	<b>Responsible Person</b>
<b>Employee Training and Certification Records</b>	Safety		
	Maintenance		
	Operations		
	Pipeline operators / contractors (O&M)		
	HAZMAT		
	Fire Brigade		
	First Aid & CPR		
	Fork Truck Operator		
	DOT Commercial Driver's License		
	DOT HAZMAT Certification		
<b>Written Procedure Manuals</b>	Safety and Loss Prevention		
	Emergency and Disaster / Contingency Plans		
	Crisis Management Plan		
	EPA / RMP		
	Unit Operating Procedures		
	Maintenance Procedures		
	Quality Control Procedures		
	Hazard Communication / MSDS		
	Security Procedures		
	U. S. Coast Guard Procedures		
<b>Lockout / Tagout</b>	Annual Audits		

<b>Element</b>	<b>Document</b>	<b>Location</b>	<b>Responsible Person</b>
<b>Personal Protective Equipment</b>	PPE Hazard Assessment		

**Selected PSM Documents and Locations**

<b>Element</b>	<b>Document</b>	<b>Location</b>	<b>Responsible Person</b>
<b>Employee Participation</b>	Written EP Plan		
<b>Process Safety Information</b>	MSDS		
	Process technology information		
	Process equipment information		
<b>Process Hazard Analysis</b>	PHA report & Corrective action status reports		
<b>Operating Procedures</b>	Operating Procedures		
<b>Training</b>	Operator training records		
<b>Contractors</b>	Contractor qualification records		
<b>Pre-Startup Safety Review</b>	PSSR Checklist		

<b>Element</b>	<b>Document</b>	<b>Location</b>	<b>Responsible Person</b>
<b>Mechanical Integrity</b>	Maintenance Procedures		
	Equipment Inspection / Test Records <ul style="list-style-type: none"> <li>• Pressure vessels &amp; storage tanks</li> <li>• Piping systems</li> <li>• Relief &amp; vent systems / devices</li> <li>• Emergency shutdown systems</li> <li>• Controls</li> <li>• Pumps / rotating equipment</li> </ul>		
	Other M.I.-related documents		
<b>Safe Work Practices – Hot Work Permits</b>	Safe Work Practices		
	Safe Work, Hot Work & Confined Space Permits		
<b>Management of Change</b>	Management of change checklists and records		
<b>Incident Investigation</b>	Incident Investigation Reports		
<b>Emergency Planning and Response</b>	Emergency Response Program		
	Records of incidents / drills & critiques		
<b>Compliance Audits</b>	Compliance Audit reports and corrective action reports		
<b>Trade Secrets</b>	Secrecy Agreements		