

Preparing for Inspections



Inspections can happen at any time. OSHA and EPA may conduct both random inspections and inspections following an error in a submittal (EPA) or if a release and/or injury (OSHA) has recently occurred. There are additional inspections (insurance, fire department, etc.) which may touch upon elements of the PSM and RMP, although typically not in as much detail as an OSHA or EPA inspection. Regardless of the reasoning or agency conducting the inspection, it is best to prepare accordingly. The following are elements that are considered “low hanging” fruit, they are easily noticed when not completed/implemented:

Note: There are states, such as California, Nevada, New Jersey, etc., which regulate their own compliance programs. Many times, these state regulated programs incorporate regular inspection frequencies.

Recommendations

One of the first and most important items to review is recommendations. Recommendations are a quick tool that inspectors can use to evaluate how frequently the facility is reviewing their PSM and RMP programs. This applies to Three Year Compliance Audit and Process Hazard Analysis recommendations however it also applies to any other recommendations that were generated such as Mechanical Integrity and Incident Investigation. Although no specific timeline for completion has been included in the regulations, it is important to show that progress is being made and that the recommendation does not remain open forever. The following should be documented for each recommendation:

- Person(s) responsible for the completion
- Schedule for the completion for open recommendations
- Date completed and resolution
- Supporting documentation is maintained
- If a recommendation is dismissed, include details explaining why the recommendation is no longer applicable.

Note: Some states, such as California, have specific timeline requirements for the completion of recommendations.

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Prevention Programs

Review the written programs for all required elements to verify they are current. Ensure the programs have been implemented and the applicable records are being maintained and are accessible.

- Operating Procedures: Current procedures. Completion of annual certification.
- Mechanical Integrity: Preventative maintenance records and basis for the schedule. Auditors typically review the calibration schedule for sensors and the replacement relief valves. Additionally there has been focus on the basis for the inspection/testing schedule (manufacturer's recommendations and/or industry standard). Also frequently cited is the lack of maintenance procedures.
- Training: Initial and refresher training records.
- Contractors: Initial review, transfer of information, and evaluations.
- Management of Change / Pre-Startup Safety Review: Records and supporting documentation (hot work permits, contractor documentation, program updates, etc.) for all applicable changes.
- Incident Investigation: Completed investigations for applicable releases. As mentioned above, documenting the resolution of any recommendations resulting from an investigation.
- Emergency Planning and Response: Current Emergency Action/Response Plan. Regular evacuation drills. Documentation of coordinating with emergency responders.
- Safety Information: Current equipment lists and piping diagrams.
- Audits: Ensure audits are completed every 3 years and certified accordingly.

Technical Studies

Ensure technical studies have been completed.

- Process Hazard Analysis: Updated/revalidated every 5 years or as necessary for system changes. Keep records (including recommendations) for every study.
- Hazard Assessment (EPA Only): Updated every 5 years or as necessary for system changes. Ensure the basis for the off-site consequence analysis release modelling is maintained with the results.

Submittals (EPA Only)

Review the most current submittal and verify that is current and accurate.

- 5 Year Resubmission was completed in time
- RMP and Emergency Contacts are accurate

Preparing for inspections by reviewing the overall program can be time consuming, however, it can assist with a smoother inspection.