PSM/RMP Process Hazard Analysis

Both OSHA's PSM and the EPA's RMP rule require an initial Process Hazard Analysis (PHA) for your covered Refrigeration System and a revalidation of that PHA at least every five years. The PHA is used to Identify, Evaluate and Control the hazards of the process.

Process Hazards: Identify ➤ Evaluate ➤ Control

A PHA Study is a set of organized and systematic assessments of the potential hazards associated with a covered process. It is designed to identify and analyze potential causes and consequences of process failure that could result in a release of our process chemical. It focuses on equipment, instrumentation, controls, human actions and external factors that could affect the process.

> *"OSHA believes that in order to conduct an effective, comprehensive process hazard analysis, it is imperative that the analysis be performed by competent persons, knowledgeable in engineering and process operations, and those persons be familiar with the process being evaluated. Some employers may have a staff with expertise to perform a process hazard analysis. This staff will already be familiar with the process being evaluated. However, some companies, particularly smaller ones, may not have the staff expertise to perform such an analysis. The employer, therefore, may need to hire an engineering or consulting company to perform the analysis."* (OSHA, PSM Preamble, 1992)

Have the experts at RC&E assist you in performing your initial PHA and required PHA validation. Here's what we bring to the PHA process:

- **Less Business Impact:** Our typical PHA lasts two days or less so your personnel can get back to work as quickly as possible.
- **Knowledge:** Our compliance personnel are entirely focused on compliance with PSM/RMP and have been for over a decade. They've seen hundreds of processes just like yours and can suggest the approach that may work best for your situation. Identified issues will include the specific regulatory, code or RAGAGEP reference so you know the issue is a legitimate one rather than an auditor's opinion.
- **Proven Methods:** Our PHA methodology uses the "What-If? / Checklist" methodology recommended by the IIAR and a modified version of the IIAR's "What-If? / Checklist" worksheets during the study, customizing them as necessary for your unique facility. We combine these three approaches to provide a comprehensive audit that will include not only the specific deficiencies in the program and/or its implementation, but suggested strategies and industry best practices to solve those problems.
- **Teamwork:** Our focus is on whether it meets the requirements of the PSM/RMP rules in a way that works for YOUR facility. Our compliance personnel always review draft findings and recommendations with your personnel during the PHA Study to ensure they fully understand the issue and the possible solutions. **We won't just point out problems – we will provide solutions.** Every deficiency we find in our PHA Study will include a specific suggested solution to that deficiency. In many cases, we will provide multiple suggestions allowing the facility to choose the method of addressing the issue that best suits their unique situation.
- **Follow-Through**: Our commitment to you doesn't end when we leave the site; we always remain available to answer questions and assist with corrective actions to recommendations.

This PHA will also include an analysis of RAGAGEP compliance meeting the IIAR 9-2020 Standard for Minimum System Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems section 2 1.2.1.1-3 & 8.1-3 requirements for a 5yr RAGAGEP analysis.

Email or call us today to have RC&E assist you with all your PSM/RM Program needs!

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