Keyes to Effective Third-Party Process Safety Audits

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Abstract

The OSHA Process Safety Management (PSM) regulation was promulgated in 1992. The EPA’s corresponding Risk Management Program (RMP) rule followed in 1996. Both programs include requirements for triennial compliance audits. Effective compliance audits are critical in identifying program weaknesses and ensuring safety of plant personnel and the surrounding public.

Larger companies with corporate and plant health, safety, and environmental groups typically have the resources and experience to conduct audits internally, either through a corporate audit team or sharing of plant personnel. Small to medium sized businesses frequently do not have the expertise or the resources to implement effective process safety programs or perform compliance audits, and rely on third-party consultants to provide these services.

This paper will discuss the observations of the authors in performing audits and working with PSM/R programs across a number of market sectors (e.g. chemical, petrochemical, pharmaceutical, food and beverage, water treatment), including effective practices, hurdles to successful implementation and execution of programs, and typical program shortcomings. The paper will also discuss steps to improve the audit process.
process and increase effectiveness whether performed by a third party or internally.