Performing Assessments of Mechanical Integrity Management Systems

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Abstract
Numerous catastrophic events have occurred in the petro-chemical manufacturing industry. The lack of adequate management systems, both in the form of written programs and the implementation of those programs, has been a major causal element in almost every one of these events. OSHA federal regulation 29 CFR 1910.119 Process Safety Management, in effect since 1992, clearly spells out the requirement to have adequate written programs. This document states the requirement that each employer has to certify that they have evaluated compliance at least once every three years to ensure that the required procedures and practices are adequate and are being followed.

Now that over twenty years have passed since 1910.119 was first introduced, why is industry still having catastrophic events linked to inadequate process safety management systems? At least three possible reasons exist:

1. Companies choose to not implement adequate management systems.
2. Companies believe that they have adequate management systems in place, but rely on their technical experts to ensure compliance without performing compliance verification.
3. Companies have conformance verification processes in place, but these processes fail to identify or address key deficiencies in their process safety management systems.

This presentation addresses the last two of the items by providing an overview of how to approach the compliance verification process for mechanical integrity management systems. It discusses the key elements required for such a process and the personnel required to support its effectiveness.