

# 10 WAYS

## To Improve Process Safety Management/Risk Management Plan Programs

We know safety is built into everything you do. But sometimes it's a challenge to stay ahead of the latest regulatory programs, like OSHA's Process Safety Management (PSM) and EPA's Risk Management Plan (RMP).

Intended to promote workplace safety, these programs have clear-cut goals: **reduce the likelihood of an accidental chemical release, foster communication between facility owners and first responders, and improve safety awareness.** That's the easy part. Sometimes, dual enforcement of these similar rules can lead to confusion or inadvertent situations of non-compliance.

Any facility that uses, stores, or handles listed hazardous substances is subject to these regulations. Put your best foot forward and avoid non-compliance with these 10 simple tips.



1

**Plan Ahead.** Submit your **RMP E-Submit** before the five year due date to let EPA know you're being vigilant about your program.



2

**Be Responsive.** Be ready to address all six of the specified **Executive Summary topics**. Keep your response short and sweet, so the reviewer doesn't have to dig for details.

### HERE'S A LIST OF WHAT'S INCLUDED:

- |  |   |                                      |
|--|---|--------------------------------------|
| 1. Accidental release prevention and emergency response policies | 3. General accidental release prevention program and chemical-specific prevention steps | 5. Emergency response program        |
| 2. Stationary source and regulated substances handled            | 4. Five-year accident history   | 6. Planned changes to improve safety |



3

**Know Who is on Point.** Did your emergency coordinator change positions? Make sure you **update the emergency contact** information for your facility within one month of a staffing change.



4

**Report Accidents .** Did you experience an accident? **Make self-reporting part of your culture.** Revise your RMP E-Submit to address any accident information within six months of the event.



5

**Review SOPs Annually.** Each year, review your **standard operating procedures and P&IDs** for accuracy. Document your findings.



6

### **Cross-check your Maintenance Database.**

Every two years (and following a system change), review your **maintenance database** to be sure it addresses the same equipment and components as the Process Safety Information. Then, confirm your **maintenance procedures** are current and accurate. Document your findings.



7

### **Document Changes in your Process.**

Complete and date the **Management of Change** and **Pre-Startup Safety Review** forms for new or modified system components and equipment prior to introducing the regulated substance.



8

### **Act Fast.** Track and resolve **Process Hazard Analysis recommendations** within six months of the event.

High risk situations require immediate action.



9

**Test & Learn.** Every three years, provide and document a **refresher course** for employee safety training.



10

**Save the Date.** Each year, review, document and update as necessary your **emergency action plan**. This includes changes to population and environmental receptors beyond the facility boundary and changes in emergency responders.

### For More Information:

Learn more about how we're helping [American Crystal Sugar Company](#) proactively manage its process safety program as part of a broader air compliance strategy.

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