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PSM ● RMP ● CalARP ● SEMS
Regulatory Framework Update & Path Forward
(Part 1 – Changes Since April 2015)

Stephanie M. Smith & Steven T. Maher
(presenters)

Risk Management Professionals
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Key Topics

• Current SMS Program Elements & Overlap
• Expansion/Modernization Initiatives Overview
• Key Elements of Regulatory Expansion/Modernization Efforts
• Potential Impact on Your Programs and Tips for Managing Your Efforts
• Questions
# Current Safety Management System (SMS) Program Elements & Overlap

Evolution of SMS Guidelines & Regulations to Performance (Goal) – Based Standards

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<thead>
<tr>
<th>Year</th>
<th>Event/Standard</th>
<th>Description</th>
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<tr>
<td>1986</td>
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<td>SMS Concept</td>
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<tr>
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<td>API RP 701</td>
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<td>1988</td>
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<td>2016</td>
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<td>Offshore Safety Management Systems (UK)</td>
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</table>
Synchronization/Overlap of Current Programs

Overview of SMS Program Expansion/Modernization Initiatives
**Key Modernization Activities**

(Onshore Facilities)

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**Recent US SMS Regulatory Activities (Onshore Facilities)**

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CalOES: California Office of Emergency Services; Cal/OSHA: California Occupational Safety & Health Administration; CSB: Chemical Safety Board; EPA: United States Environmental Protection Agency; IRTF: Interagency Refinery Task Force; OSHA: U.S. Occupational Safety & Health Administration; Cal/EPA: California Environmental Protection Agency; CCC: Contra Costa County; CoR: City of Richmond
Key Elements of Regulatory Expansion/Modernization Efforts

CalARP Program 4 Applicability (8 CCR §2745.7.5)

• Per 8 CCR §2735.4 (f):
  “Program 4 eligibility requirements. A stationary source is subject to the program 4 if it has an NAICS code of 324110.”

• NAICS Code 324110 definition:
  Industry is comprised of establishments primarily engaged in refining crude petroleum into refined petroleum, including fractionation, straight distillation of crude oil, and cracking.

• Program 4 does not specifically state applicability to other NAICS codes or agency determination (yet).
Impact Categories

Regulatory Expansion/Modernization Efforts Fall Into Four Main Categories

1. Potential to alter facility program types / add additional facilities to regulatory programs
2. Potential for significant effort/changes, or is significantly different from existing requirements
3. Items that require minimal effort or additional requirements that are low effort, but still require attention
4. Negligible effort beyond what is already done for existing regulations

Current OSHA, EPA, Cal/OSHA & CalARP Initiatives

<table>
<thead>
<tr>
<th>Topic</th>
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<tr>
<td>Atm. Storage Tank PSM Exemption Clarification [1]</td>
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<td>- Employee Participation Plan [2,A]</td>
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<td>Emergency Ops – Restricted to Qualified Operators &amp; Other Specifics</td>
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<td>2762.3(a)</td>
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<td>Specific Training Topics to be Covered</td>
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<td>Specific Requirements for Written Training Program</td>
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<td>2762.10</td>
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</tbody>
</table>

**NOTES**
A - Also part of Contra Costa County ISO 450-8 & Analogous CoR ISO

**REFERENCES**
- OSHA RFI, 17 Topics on “Modernization” of PSM – December 9, 2013
- US EPA RFI, 26 Topics on “Modernization” of RMP – July 31, 2014
- CalOES, Proposed 19 CCR 2735.1 to 2785.1 and App. A & B – May 26, 2015 (DRAFT)
Summary of Recent CalPSM-R (§5189.1) Changes

- Changes in 26May15 Second Draft (from 31Oct14 Initial Draft) Do Not Materially Affect Some of the Elements that Have the Potential for Significant Effort/Alterations
  - DMR
  - ISD/ISS/HCA
  - SPA
  - Management of Organizational Change
  - Process Safety Culture Assessment
  - Human Factors
  - Incident Investigation Root Cause Analysis Requirements
  - Process Safety Performance Indicators/Metrics
  - PHA Recommendation Closure
- Minor Changes – “Harmonize” with CalARP Program Proposed Amendments

Summary of CalARP Changes

(Key Revisions in 26May15 Draft)

- Define Program 4 Facilities
  - Loss of Exemptions Result in Some Program 1, 2 NAICS Code 32411 becoming Program 4
- Align Key Elements with CalPSM-R
- References to Facility “Owner or Operator” are More Generalized
- Significant Differences to CalPSM-R
  - Accelerated Element Implementation Timing (e.g., Process Safety Performance Indicator Annual Reports – Starting 01Jan17)
  - Publication of Incident Investigation Reports
  - Publication of HCA Reports (2762.13(b)(4))
  - Facility Funding of UPA’s Process Safety Culture Assessment (2762.14(i))
  - Review of Contractor IIPP for 5189.1(h)(2)(A)
Summary of CalARP Changes
(Key Revisions in 26May15 Draft)

• Significant Differences to CalPSM-R (continued)
  – Emergency Preparedness & Response
    • Program 4 facilities must create an ERP (i.e., not EAP) (2765.2)
    • Additional CUPA Involvement (2765.2)
    • Drill Requirement (2745.8(d))
  – Process Safety Performance Indicators (within 6 months of regulation approval) – Includes Annual Report (starting 01Jan17) (2762.15(i))
    • Past-due Equipment Inspections
    • Past-due PHA Actions & Seismic Safety Actions
    • Past-due Incident Investigation Actions
    • Summary of Major Incidents
    • Seal Leak Repair Details
    • Site-Specific PSPI

SEMS-Related Updates

• 15Oct10 – Initial Promulgation of Safety and Environmental Management Systems (SEMS)
• 05Apr13 – Promulgation of SEMS Updates (SEMS II)
• To compliment Subpart S (SEMS), BSEE made several changes to 30 CFR 250 to provide additional focus on "Blowout Preventer Systems and Well Control" to address key recommendations made after the Deepwater Horizon tragedy, to close gaps in existing requirements, and to update BSEE regulations to reflect industry best practices
  – 13Apr15 – Proposed Rule
  – 16Jul15 – Deadline for Comment on Proposed Rule
SEMS-Related Updates

• Proposed Requirements/Changes
  – Blowout Preventer (BOP) Design, Manufacture, Repair, & Maintenance
  – Controls over the Maintenance and Repair of BOPs.
  – Use of BOPs with Double Shear Rams
  – Centering the Drill Pipe During Shearing Operations
  – Third-party Certification of the Shearing Capability of BOPs
  – Expansion of Accumulator Capacity
  – Monitoring of Deepwater and High-temperature/High-pressure Drilling Activities
  – Testing of Subsea Well Containment Equipment
  – BOP Failure Data Reporting
  – Safe Drilling Margin Definition and Adherence
  – Drilling and Completion Equipment Performance Criteria
  – Use of ROVs to Assist in Closing the BOP Stack
  – Cementing and Use of Centralizers
  – BOP Testing Frequency

Potential Impact on Your Programs and Tips for Managing Your Efforts
Key Modernization Activities (Onshore Facilities)

Status and What to Expect

• Chemical Safety Board (CSB)
  – April 2013, October 2014, January 2015 – All 3 Investigation Reports Published
  – Investigation Completed, Recommendations Tracked

• U.S. EPA
  – RFI Comments to be Processed
  – Draft Regulations to be Generated
  – Timeline – “Years, not Months”
  – Currently (25Jun15) Drafting a “Proposed Rule Making”

• Federal OSHA
  – RFI Comments to be Processed
  – Draft Regulations to be Generated
  – Timeline – “Years, not Months”
  – “Small Business Regulatory Flexibility Review Act”

CalOES: California Office of Emergency Services; Cal/OSHA: California Occupational Safety & Health Administration; CSB: Chemical Safety Board; EPA: United States Environmental Protection Agency; IRTF: Interagency Refinery Task Force; OSHA: U.S. Occupational Safety & Health Administration; CalEPA: California Environmental Protection Agency; CCC: Contra Costa County; CoR: City of Richmond
Status and What to Expect

- Contra Costa County & City of Richmond
  - June 2014 – Issued ISO 450-8 (“Risk Management”) & Analogous CoR ISO
  - Current Initiative to Increase Involvement of Community Oversight Group in Process Safety Culture Assessments
- California Interagency Refinery Task Force (IRTF)
  - Agency Meetings Continue
  - Additional Reports Not Planned
- Cal/OSHA CalPSM-R
  - 26May15 Second Draft §5189.1 Issued
  - Final Regulation Promulgation – Estimated Summer 2016
  - Initially 2 Separate PSM Regulations in California
  - Initially, No Synchronization w/Federal PSM/RMP Requirements or CalARP

Status and What to Expect

- CalEPA & CalOES CalARP
  - 01Jan15 – Promulgation of Minor Update to CalARP
  - 26May15 Draft of Additional Update to Align with Draft §5189.1
  - Final Regulation Promulgation – Estimated Summer 2016
  - Single CalARP Regulation with Additional Requirements (Program 4) for “High Hazard Facilities” (NAICS 32411)
  - Initially, Some Alignment with §5189.1, but No Synchronization w/Federal PSM/RMP
CalARP & CalPSM-R Timeline

May – Draft PSM and CalARP Amendments Issued

June 4 – CalOES Safety Forum in Martinez

June 22 – Cal/OSHA PSM Advisory Meeting Los Angeles

June 29-30 – CalOES Safety Forums in Los Angeles

Dec-Jan – Public Comment Period

Oct or Nov – Initiate Formal Rulemaking

July 29 – CalOES Safety Forum in Richmond

July 1 – CalOES Safety Forum in Bakersfield

Spring 2016 – OSHA Standards Board Meeting

Summer 2016 – Final Rule

From www.calepa.ca.gov (23Jun15)

What Should I be Doing Now?

• All California CalARP-Covered Facilities
  – Adherence to New 01Jan15 CalARP Requirements

• Contra Costa County & City of Richmond – 9 Facilities
  – Adherence to June 2014 CCC ISO 450-8 & Analogous CoR ISO

• California Petroleum Refineries
  – Recommendation from a Key Regulator – Begin Applying “High-Value/Priority” Elements of CalPSM-R & New CalARP Now – Once promulgated, “schedules will be tight,” and if substantial progress has been made addressing the spirit of the new requirements, “selective-grandfathering” may be allowed.” Tight schedules could result in a shortage of qualified resources.
  – Some elements (e.g., HCA) are significantly more cost-effective in the design-phase, or at the earliest possible opportunity.
What Should I be Doing Now?

- U.S. PSM/RMP-Covered Petroleum Processing and CalARP-covered Facilities
  - Awareness of CalPSM-R for Best Practices for “High Hazard Facilities”
- All – Closely Monitor Regulatory Changes
- Potential For
  - Later expansion to other highly-hazardous facilities in California
  - Later expansion to non-California petroleum refineries & others
  - Inference to new requirements as best practice
  - General Duty Clause correlation

Resources for Handling Evolving Guidelines

- HAZOP/LOPA Facilitation Webinar Series (Module 10) – Effective approaches to handling CSB recommendations and PSM and CalARP changes
  - DMR
  - SPA
  - Inherently Safer Systems/Design (i.e., HCA)
- 2015 Global Congress on Process Safety – Papers
  - Maher, Nour, Schultz, ”Effectively Addressing New PSM/RMP Damage Mechanism Review Requirements with an Integrated PHA (iPHA)”
  - Maher, Schultz, ”Changes in the PSM/RMP Regulatory Framework (California and National)”
- Webinars – Updates on the PSM/RMP Regulatory Modernization Programs
  - 19Aug14
  - 25Sep14
  - 22Jan15
  - 09Aug15
- Webinar – DMR and the Integrated PHA (iPHA) Approach – 26Mar15
- Links are provided on www.RMPCorp.com/SMS_Regulatory_Updates/
Summary & Conclusion

- Agencies are taking a fresh look at SMS Programs.
- Current focus is California and Refineries.
- Potential for expansion to other U.S. PSM/RMP Facilities.
- Likely near/medium-term desynchronized, but overlapping requirements.
- Potential for long-term movement towards synchronization.
- There are easy steps to take now to infuse some of the new requirements into your PHA activities.
- Process Safety & Risk Management Professionals should:
  - Carefully monitor modernization programs.
  - Focus on charting the course for the long-term success of your facility’s programs.
  - Develop a strategy for effective implementation.
- Part 2 of this Webinar will focus on effective implementation tips/strategies and overview the results of the late-June/early-July CalOES Safety Forum Meetings.

Stay Tuned!

July 14 Webinar
ERP vs. EAP for Ammonia Facilities

July 30 Webinar
PSM ● RMP ● CalARP ● SEMS Regulatory Framework Update & Path Forward (Part 2)

August 18 Webinar
Case Studies in Process Safety – Why the new PSM/RMP/CalARP regulations are focusing on PHA

September 17 Webinar
Application of HAZOP/LOPA During the Design Phase – Saving Time and Money

September 29 Webinar
Assimilating Design Formulation & Design Review into a HAZOP (Lessons Learned & More Tips)

www.RMPCorp.com/SMS_Regulatory_Updates/
Questions?

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