

# Process Safety Management / Risk Management / General Duty Clause Programs

The Environmental Protection Agency (EPA) developed the Risk Management Plan (RMP) rule to protect the community, the general public around a facility, and adjacent sensitive receptors such as schools and hospitals. The Occupational Safety and Health Administration (OSHA) established the Process Safety Management (PSM) rule to protect the workforce, contractors, and visitors to a facility. RMP and PSM are rules intended to prevent chemical disasters such as the catastrophic Bhopal Disaster of 1984, and releases of toxic, flammable, reactive, or explosive chemicals. In order to keep your workplace and neighbors safe, maintaining active facility programs in compliance with these regulations is critical.

Since the 1990s, facilities that use, store, manufacture, handle, or have on-site movement of substances greater than applicable thresholds have been required to comply with OSHA's PSM Program and EPA's RMP requirements. A common misconception among smaller facilities is that they are exempt from compliance because the quantity of substance they store is less than the applicable thresholds, but this is incorrect. There is a regulatory compliance "catch-all" for smaller facilities: The General Duty Clause (GDC). These clauses (whether from OSHA or EPA) cover all facilities using hazardous substances, including those with less than the applicable RMP or PSM threshold. The regulations can be found in 29 USC 654(a)(1) (OSHA) and the Clean Air Act Section 112(r)(1) (EPA). They set a minimum safety standard and place responsibility on employers to keep workers and neighbors safe from accidents involving hazardous chemicals.

CAPACCIO's experience with industrial processes and knowledge of compiling and reviewing process safety information is integral to the development of a complete process safety management system. We are highly qualified in the development, implementation and auditing of RMP, GDC, and PSM programs.

Our scientists and engineers assist industry in RMP, GDC, and PSM compliance by:

- Conducting and documenting complete process hazard analyses (PHAs) using What-if/Checklists, Hazard and Operability Studies (HAZOP), and other methods appropriate for the specific process
- Performing enforceable 3-year RMP and PSM program audits
- Conducting GDC program audits
- Reviewing and updating 5-year RMP submissions to EPA
- Developing programs for new facilities and carrying out gap analyses on recently established programs

## BENEFITS

- Protect your workers, the community, and the environment
- Avoid loss of time or unnecessary fines due to accidents, fines, or explosions
- Ensure your company does not experience a cataclysmic event
- Minimize risk and prevent incidents
- Increase efficiency
- Maintain systems and a safe working environment
- Ensure business continuity
- Satisfy shareholder interests and protect your company's reputation
- Meet customer and production demands
- Help manage and foster good public relations

## SERVICES

### Risk Management Planning (RMP)

- Three year audits
- Five year EPA updates via EPA Contact Data Exchange (CDX)
- Emergency response plans
- Hazard assessments
- Management programs
- Off-site consequence analyses using-RMP\*Comp-ALOHA-TSCREEN
- Prevention programs
- RMP applicability evaluations
- RMP master document
- RMP submit™ registrations

### General Duty Clause (GDC)

- Program audits
- Applicability evaluations
- Hazard assessments
- Off-site consequence analyses
- Prevention program development
- Coordination with local emergency response agencies

### Process Safety Management (PSM)

- Three year audits
- Five year PHA updates
- Applicability reviews
- Mechanical integrity program reviews
- Review of written programs and procedures

### Compliance Assistance

- Auditing
- Facility compliance evaluation
- Legal counsel technical support
- NON/ACOP response preparation
- Regulatory agency meetings



- Strategic compliance/permit planning Assessments
- Air refrigeration management
- Compliance testing
- Greenhouse gas inventories
- Permit and regulatory compliance review
- Process emission inventories
- Protocol development
- Testing supervision

### QUALIFICATIONS

CAPACCIO's professionals are:

- Certified Safety Professionals (CSP)
- Licensed Professional Engineers (PE)
- Certified RABQSA Auditors
- Certified Industrial Hygienists (CIH)
- Certified Hazardous Materials Managers (CHMM)
- Members of Air and Waste Management Association (A&WMA)



293 Boston Post Road West  
Marlborough, MA 01752

T: 508-970-0033 o F: 508-970-0028

[www.capaccio.com](http://www.capaccio.com) - [www.ems-hsms.com](http://www.ems-hsms.com)