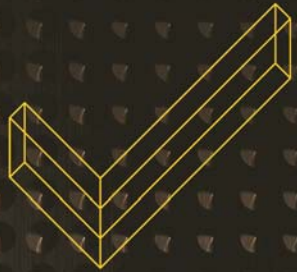


**2011 API
Inspection
Summit
and Expo**

PSM Covered Chemical Facilities National Emphasis Program
The “Chem NEP”

**by Mark R. Briggs
Area Director
Houston South Area Office**



2011 API Inspection Summit and Expo

Presenter

Here You Will tell The Audience A Little about yourself and your experience. You may place your company name and logo on this page only.

- 30 Years Hydrocarbon Experience Around The Globe
 - Current chair API Sub Committee on Inspection (Refining Group)

Current job

- Support company operations worldwide on NDE & Inspection Issues. Specific focus on upstream NDE and Pipeline Issues.
- Active in RBI programs for upstream assets.

Chem NEP

- Chem NEP effective July 27, 2009
- Extended by Assistant Secretary Memorandum (October 4, 2010) until updated NEP is finalized
- Strategy
 - **Not** comprehensive
 - **Less** resource intensive for both OSHA and employers

Chem NEP

- One year pilot program for planned inspections in 3 OSHA Regions:
 - Region I – CT, MA, ME, NH, RI
 - Region VII – Nebraska, Kansas, Missouri
 - Region X – Idaho
- State Plans urged to participate voluntarily
 - Most states are doing Chemical NEPs

Chem NEP Facility Selection (Programmed Inspections Only)

- Selected from list of:
 - EPA Risk Management Program (RMP) Program
3 facilities
 - OSHA IMIS database (previous PSM citations)
 - Explosives Manufacturing
 - Facilities identified by local (Area and Regional Office) knowledge

Chem NEP Approach

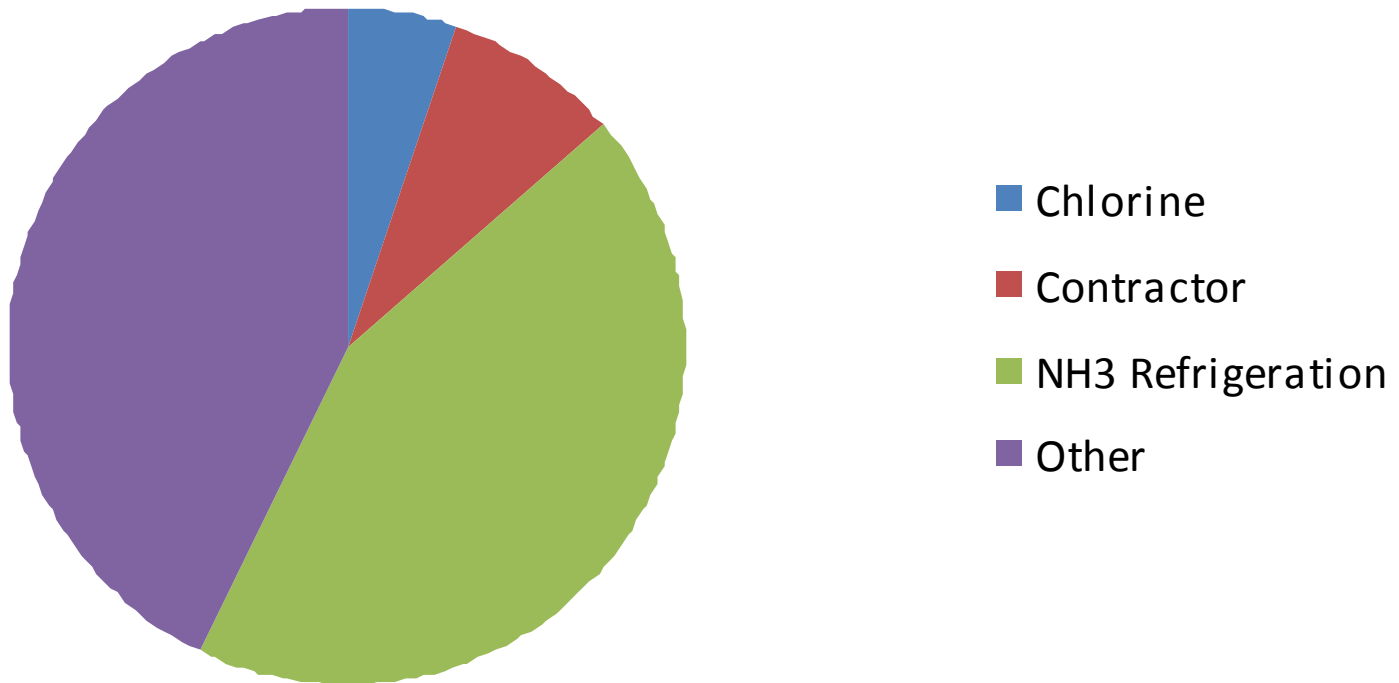
- Questions are specific and contain compliance guidance (similar to Refinery NEP)
- Questions differ by type of facility
 - Ammonia refrigeration
 - Chlorine water/wastewater treatment
 - General PSM (e.g., storage only)
 - Chemical Processing
- Dynamic questions are not published outside OSHA and change periodically

Chem NEP Inspections

- As of December 31, 2010, 151 inspections opened
 - 52 Unprogrammed (34%)
 - 99 Programmed (66%)
 - 19 resulted in no inspection occurring because there was no PSM covered process
- 96 inspections have issued citations or closed without citations
- Average 9.0 citations per inspection
- Average \$25,129 penalties per inspection

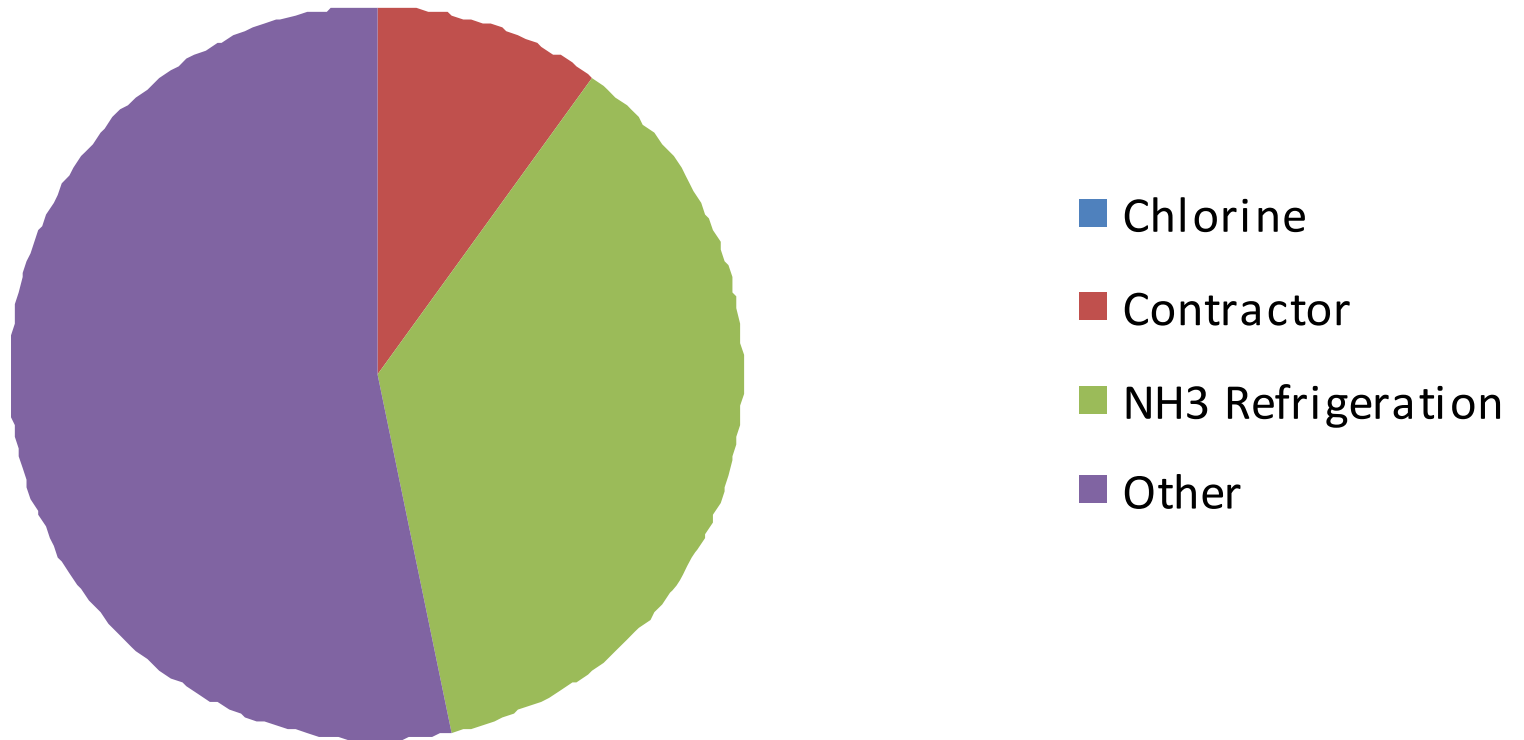
Chem NEP Inspections – Facility Type

Programmed Inspections



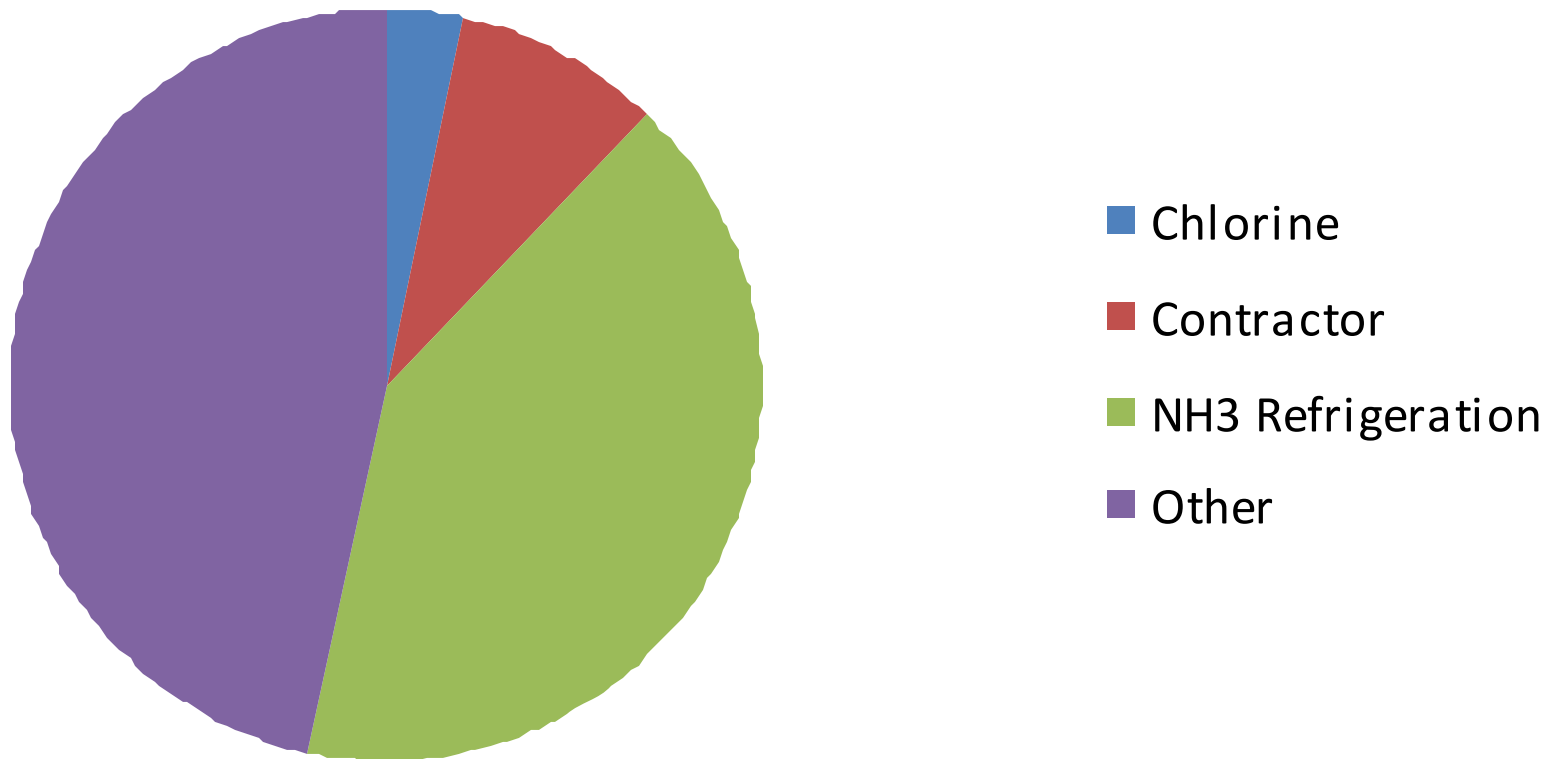
Chem NEP Inspections – Facility Type

Unprogrammed Inspections



Chem NEP Inspections – Facility Type

Total Inspections

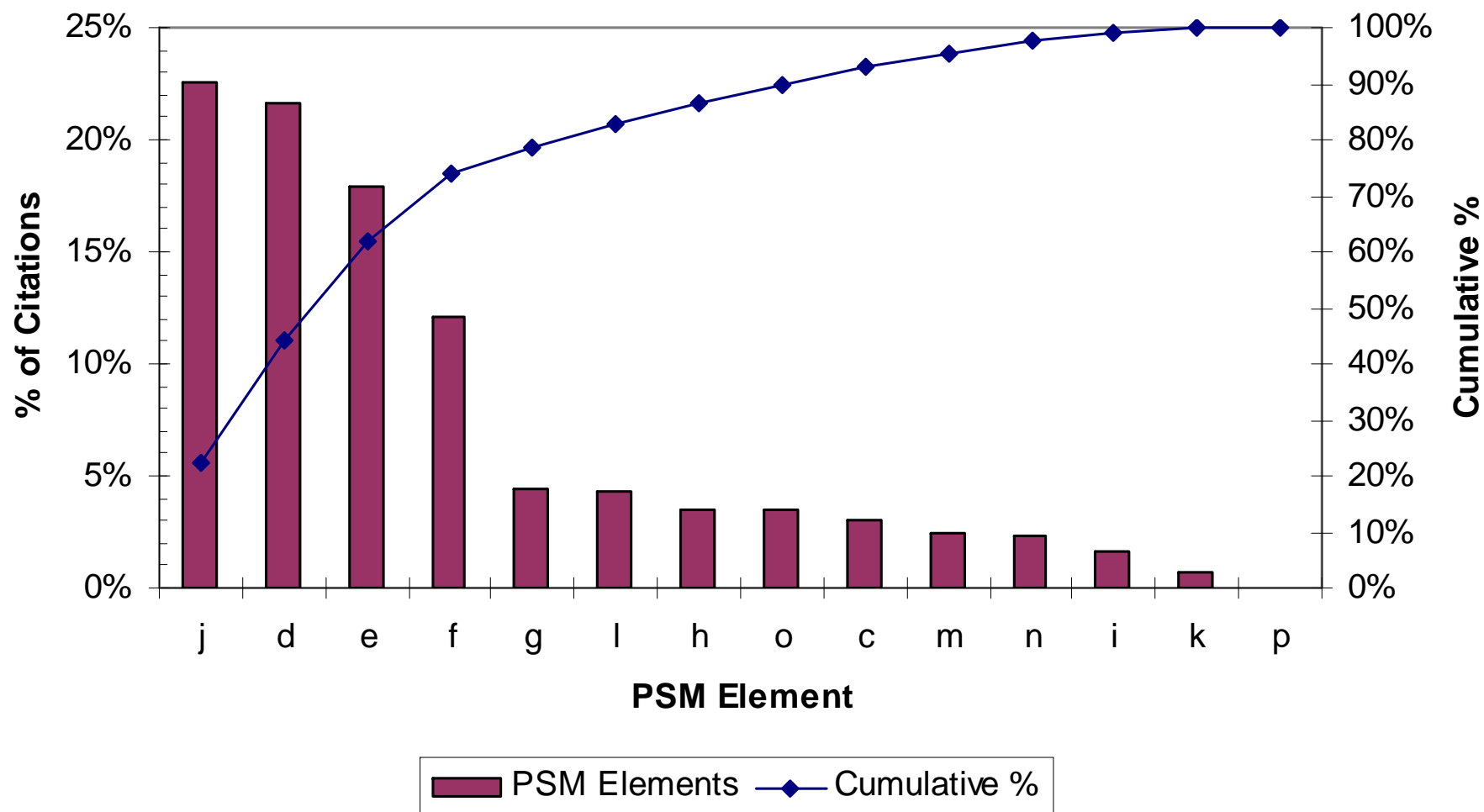


Chem NEP Citations by PSM Element

Element	Description	% of PSM Citations	Cumulative %
j	Mechanical Integrity	22.5%	22.5%
d	Process Safety Information	21.6%	44.1%
e	Process Hazard Analysis	17.9%	62.1%
f	Operating Procedures	12.1%	74.1%
g	Training	4.4%	78.5%
l	Management of Change	4.3%	82.8%
h	Contractors	3.5%	86.3%
o	Compliance Audits	3.5%	89.9%
c	Employee participation	3.0%	92.9%
m	Incident Investigation	2.5%	95.4%
n	Emergency Planning & Response	2.3%	97.7%
i	Pre-startup Review	1.6%	99.3%
k	Hot Work	0.7%	100.0%

Chem NEP Citations by PSM Element

PSM Element Citation Frequencies



Chem NEP Citations by OSHA Standard Sub-element

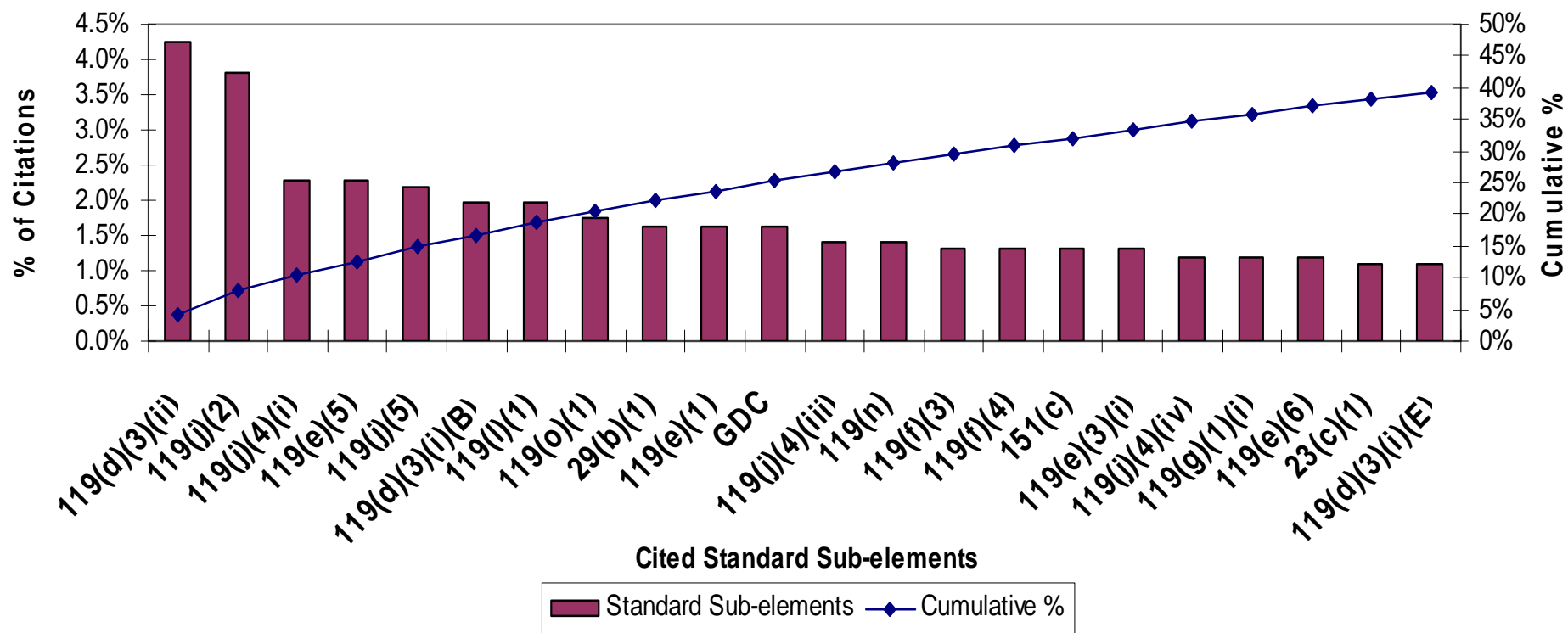
Sub-element	Description	% All Citations	Cumulative %
119(d)(3)(ii)	PSI RAGAGEP	3.8%	3.8%
119(j)(2)	MI written procedures	3.8%	7.5%
119(j)(4)(i)	MI I&T performed	2.2%	9.7%
119(e)(5)	PHA findings & recommendations	2.0%	11.7%
119(j)(4)(iii)	I&T frequency	2.0%	13.7%
29(b)(1)	Mobile ladders and scaffolds	1.9%	15.6%
119(j)(5)	MI equipment deficiencies	1.8%	17.4%
119(d)(3)(i)(B)	PSI P&IDs	1.6%	19.0%
119(j)(4)(iv)	MI I&T documentation	1.6%	20.6%
119(n)	Emergency Planning & Response	1.6%	22.2%
119(o)(1)	Compliance Audits performed	1.6%	23.9%
119(e)(1)	PHAs performed	1.5%	25.3%
119(e)(3)(iii)	PHA engineering controls	1.5%	26.8%
119(f)(3)	Operating Procedures certification	1.5%	28.3%

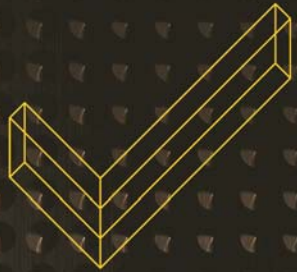
Chem NEP Citations by OSHA Standard Sub-element (continued)

Sub-element	Description	% All Citations	Cumulative %
119(f)(4)	OP safe work practices	1.5%	29.8%
151(c)	Eyewash stations	1.5%	31.3%
119(l)(1)	MOC not performed	1.3%	32.6%
GDC	General Duty Clause	1.2%	33.8%
23(c)(1)	Guarding floor openings	1.2%	35.0%
119(f)(1)	OP not developed & implemented	1.2%	36.3%
119(g)(1)(i)	Initial Training	1.2%	37.5%
119(e)(3)(i)	PHA - address hazards of process	1.1%	38.5%
119(e)(6)	PHA - reval at least every 5 years	1.1%	39.6%
119(d)(3)(i)(D)	PSI - relief system des & des basis	0.9%	40.6%
119(d)(3)(i)(E)	PSI - ventilation system design	0.9%	41.5%

Chem NEP Citations by OSHA Standard Sub-element

OSHA Standard Sub-element Frequencies





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Questions???

Mark R. Briggs - Area Director

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