REGULATORY ASSISTANCE
PSM/RMP Compliance

Trinity Consultants

Founded in 1974, Trinity Consultants helps organizations overcome complex, mission-critical challenges in EHS, engineering, and science through expertise in consulting, technology, training, and staffing. We support clients in geographies worldwide and across a broad range of sectors including industrial, energy, manufacturing, mining, life sciences, and commercial/institutional.

Our reputation for excellence in providing a broad range of environmental management services for clients nationwide, across many industries, extends to Process Safety Management (PSM) and Risk Management Program (RMP) assistance. Our PSM services focus on creating an effective process safety culture that covers the breadth and depth of the OSHA PSM regulation. Our experts understand the PSM/RMP crossover that occurs when a facility reaches RMP Level Three applicability, and work with our clients to create a seamless program that allows for both OSHA PSM and EPA RMP compliance. Our RMP expertise covers offsite consequence analysis ranging from simple to complex release scenarios and can leverage the Breeze Incident Analyst and ExDAM suite of modeling software.

Industry Regulations

The Process Safety Management (PSM) standard, regulated by the Occupational Safety and Health Administration (OSHA) at 29 CFR 1910.119, is a performance standard that regulates the storage and/or processing of toxic, reactive, flammable or explosive substances. It requires affected facilities to develop and implement a PSM program with the purpose of preventing or minimizing the consequences of catastrophic chemical releases. Its purpose is to protect workers.

The Risk Management Program (RMP) developed under Section 112(r) of the 1990 Clean Air Act Amendments and promulgated under 40 CFR 68, regulates the storage and/ or processing of toxic and flammable substances. It requires affected facilities to develop and submit risk management plans that include a hazard assessment (off-site consequence analysis), prevention program (similar to the PSM program), and emergency response program. The RMP is based on a three-tiered approach designed to link the required analysis and planning with the degree of risk associated with the facility. Its purpose is to protect the public and the environment.

PSM/RMP Applicability

Processes considered PSM-covered must adhere to a set of required elements listed in the OSHA regulation. However, many facilities that deal with hazardous chemicals have adopted PSM techniques and procedures because they are generally accepted as "best practices" for keeping personnel safe from chemical incidents.

The RMP applicability determination results in a program level assignment for each qualified process which prescribes the program elements that must be met. For Level One and Two processes, facilities may evaluate options to modify processes in order to opt out of the standard or step down to a less rigorous level of requirement.

Level Three RMP programs share twelve elements in common with PSM, making the co-management of these programs more logical. Understanding the nuances in applicability, program management and compliance is essential.

Trinity's senior consultants, process safety and environmental experts combine to offer comprehensive program management that serves to enhance the safety of employees, the surrounding environment, and the greater community.

Our PSM/RMP Services

Trinity's PSM/RMP support includes the following:

- **Jurisdictional Boundaries** - We can determine if your facility is PSM and/or RMP covered and to what extent the coverage applies.
- **Process Safety Information (PSI)** - We implement proven methods to ensure and maintain the accuracy and consistency of PSI.
- **PHA and Risk Assessment** - Our team facilitates a variety of Process Hazard Analysis methodologies and other comprehensive risk studies, including Layer of Protection Analysis (LOPA).
- **Mechanical Integrity** - We provide full support for implementing and executing a comprehensive and accurate fixed equipment Mechanical Integrity and Inspection program.
- **Compliance Audits** – We provide support in conducting, developing, and/or implementing successful compliance audit programs, as required by applicable programs.
- **Pressure Relief Systems** – We provide pressure relief system services that satisfy all federal regulations. We offer engineering design, analysis and revalidation, flare and disposal system evaluations, process simulations, onsite or remote engineering support, and third-party audits.
- **Independent Protection Layers** - We provide the services related to the documentation, design and maintenance of new and existing IPLs.
- **Custom PSM/RMP Training** - We can present standard or customized training to your employees remotely or in-person to ensure a successful implementation of your PSM/RMP program.
  - National training courses: "Introduction to OSHA Regulations" and "Understanding and Application of PSM/RMP Requirements"
- **Offsite Consequence Analysis (OCA) and Onsite Best Practices Modeling** – We develop, update, and review OCA modeling to meet RMP requirements and best practice reviews. These modeling studies can be used to evaluate toxic releases and fire/explosion scenarios, including building damage assessment.
- **Risk Management Plan** - We assist clients in preparing and submit Risk Management Plan initial submissions, corrections, and resubmissions to local CUPA and EPA via the EPA RMP*eSubmit database.
- **Management of Change (MOC)** - We can assist you to implement, steward, and audit MOC processes to ensure long-term maintainability and success.

- **Pre-Startup Safety Review (PSSR)** - We facilitate and support PSSRs, including redlining as-built PSI, procedures, and ensuring proper completion and documentation.
- **Incident Investigation** - We facilitate investigation methodologies, including Root Cause Analysis, Fault-tree, and Five Why.
- **Agency Inspections** – We support clients during agency compliance inspections, responses to enforcement activities, and consent order negotiation.
- **Turnkey PSM/RMP Program Development** – We develop a complete, site-specific PSM/RMP program for client processes newly subject to the PSM and / or RMP regulations, incorporating existing site documents and programs where possible.
- **Software Solutions** - We deliver custom software applications that can replace or improve your current solutions and help you meet PSM/RMP objectives.
- **Contractors** - We help develop programs that ensure contractors stay informed and have input into PSM/RMP programs.
- **Emergency Response** - We develop, prepare, and implement strategies to manage highly hazardous chemical releases effectively and safely. We develop Emergency Action or Emergency Response Plans specific to the actions your employees will take in response to releases.
- **Employee Participation** - We develop programs that lay the foundation for enhanced employee involvement and input into PSM programs.
- **Hot Work Permit** - We develop and audit Hot Work programs to ensure compliance.
- **Trade Secrets** - We address trade secret requirements for PSM-covered processes and provide appropriate Confidential Business Information (CBI) protection in Risk Management Plan updates.

Why Choose Trinity

In short, there's no better choice for your EHS needs. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

For assistance with PSM/RMP applicability determination and compliance requirements, contact Trinity at 800.229.6655.

ISO 9001:2015 certified at our corporate office in Dallas, Texas