

VIEWS & INFORMATION ON ENVIRONMENTAL WORKPLACE SAFETY

# VIEWS



## Risk Management and Process Safety Management (RMP/PSM): Description, Procedures, Goals



Ray Hui

OEHSC RMP Specialist

### What is Risk Management?

Risk management works to identify and manage threats to the health and safety of employees as well as the safe operation of DEP's facilities. This is a complex and involved process requiring the review of operations, the identification of potential threats and the likelihood of their occurrence, and then taking appropriate actions to address the most likely threats. When properly conducted and administered, a Risk Management Program dramatically reduces the possibility of catastrophic events occurring and of employers and employees failing to know how to proceed safely if they do.

### Risk Management at DEP

The Risk Management Program and Process Safety Management (RMP/PSM) program at DEP was developed to support additional management initiatives regarding health and safety, to build on the progress BWS and BWSO made in achieving compliance with RMP/PSM requirements, and to ensure and promote sustained compliance to OEHSC regulations within a program of continuing improvement at all DEP facilities. For example, in 2006 DEP implemented an effective RMP compliance program at its four chlorine facilities, which is ongoing, to perform programmatic audits and conduct emergency response drills at chlorine facilities.

Continued on page 4

### INSIDE

Risk Management	1
Training, Tracking, and Recording System	2
Holiday Health and Safety	3

### Department of Environmental Protection

Steven W. Lawitts  
ACTING COMMISSIONER

### Office of Environmental, Health & Safety Compliance

Gerould J. McCoy  
ASSISTANT COMMISSIONER,  
ENVIRONMENTAL, HEALTH & SAFETY COMPLIANCE

59-17 Junction Blvd.  
14th Floor  
Flushing, NY 11373

PHONE (718) 595-4782  
FAX (718) 595- 5546

### EDITOR

Kevin Z. Moore

### CONTRIBUTORS

Environmental Coordination Committee  
Health & Safety Coordination Committee  
Training Coordination Committee

December/Winter

Vol. 7: Issue 4



## Training Tracking Reporting System (TTRS)

*Doreen J. Johann, OEHSC Director of Compliance Support*

Data mining and tracking trends in agency progress in Environmental, Health and Safety (EHS) have become routine procedures at DEP. Data is gathered and transformed into information that provides the agency with a means to improve and enhance existing programs, and tracking EHS training data is no exception.

Historically, bureaus have used different mechanisms to track EHS training of employees, but the bureaus involved decided that an agency-wide system was needed in order to ensure and maintain regulatory training compliance. To accomplish this, a user group was established within the Training Coordination Committee (TCC), which consists of training coordinator representatives from all the bureaus as well as OIT and OEHSC. The purpose of this group was to gather the requirements for the building and development of this important tracking system.

What does it mean to gather requirements? Gathering user requirements for the TTRS is a process in which users research the internal processes or operations of each bureau to make sure that all training needs are addressed in the development of a computer-based tracking system. In order to meet this requirement as effectively as possible, the larger bureaus (BWS, BWOS, BWT and BEDC) took the lead on sharing their needs, which included items such as tracking employees who are coming due for mandated EHS courses, certifications, licenses, and certificates of fitness. However, the Mission Support Bureaus (*i.e.*, BEC, HRA, BCS, Legal and others) also supplied data for the system. As each phase was developed, a TTRS demonstration was given to the users so that they could give further input to ensure that their needs were correctly interpreted and translated appropriately into the system. After the demo, all users were given access to a test server, giving them the opportunity to use the system and post their comments on a Share Point site, allowing for collaborative information sharing. In this way, an effective information gathering process was implemented which was critical to the success of this and any new tracking system within it.

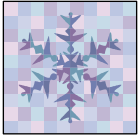
The project's difficulty was increased because each bureau proved to be its own unique entity; some with more complex tracking requirements than others. Because of this, the bureaus were also asked to review their data for accuracy so that the data to be uploaded was current and correct. Many bureaus underwent a reorganization that affected the training profiles of employees, and these new standards had to be noted and then uploaded into the system. Other requirements noted and considered during this gathering period included reporting needs, archiving employees' training records, creating a function for revising training profiles, and so forth.

I am pleased to announce that the TTRS will be rolled out on a pilot basis in early 2010. Afterward, the remaining bureaus will be brought into the system. OEHSC will provide training on the new system to ensure its effective operation.

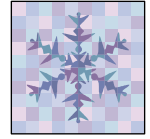
On the technical side, the TTRS is built on a Share Point platform, a user-friendly interface. The TTRS has the additional advantages of fostering better agency-wide communication, flagging employees coming due for mandated EHS training, providing standardized reporting on various compliance tracking needs, and alerting supervisors of employees who have not had the necessary training to prevent them from performing tasks that could potentially put them at risk in the workplace. The TTRS will, in addition, allow bureau training coordinators to receive email notifications of available EHS classes among its wide variety of useful functions.

Everyone on the TTRS team worked long and hard to make this a reality, and I want to acknowledge the work of all members as well as OIT and the consultants who worked along with us.

**Happy Holidays !**



# Holiday Health and Safety Tips



Brenda Thompson  
OEHSC Compliance Support

The holidays are a time to celebrate, give thanks, and reflect. They are also a time to pay special attention to your health. Give the gift of health and safety to yourself and others by following these holiday tips.

## Manage Stress

The holidays don't need to take a toll on your health. Keep a check on over-commitment and over-spending. Balance work, home, and play. Get support from family and friends. Practice time management. Keep a relaxed and positive outlook.

## Handle and Prepare Food Safely

As you prepare holiday meals, keep you and your family safe from food-related illness. Wash hands and surfaces often. Avoid cross-contamination by keeping raw meat, poultry, seafood, and eggs away from ready-to-eat foods and eating surfaces. Cook foods to the proper temperature. Refrigerate promptly. Do not leave perishable foods out for more than two hours. Choose fresh fruit as a festive and sweet substitute for candy.

## Holiday Lights

Use only lights that have been tested for safety by a testing laboratory. Use only lights that have plugs containing fuses. Check each set of lights, new or old, for broken sockets, frayed or bare wires, or loose connections. Throw out damaged light sets. Always replace burned-out bulbs promptly with the same wattage bulbs. If using an extension cord, make sure it is rated for the intended use. *Never* use electric lights on a metallic tree. The tree can become charged with electricity from faulty lights, and a person touching a branch could be electrocuted. Before using lights outdoors, check labels to be sure they have been certified for outdoor use. Protect outdoor lights by securely fastening to trees, house walls, or other firm supports to protect the lights from wind damage. Use only insulated staples (not nails or tacks) to hold strings in place. Or, run strings of lights through hooks (available at hardware stores). Turn off all holiday lights when you go to bed or leave the house. The lights could short out and start a fire. Never pull or tug on outdoor lights when removing them. This could cause stress on the connections that could create a fire hazard. Outdoor electric lights and decorations should be plugged into circuits protected by ground-fault circuit interrupters (GFCIs) to protect against electric shock. Portable outdoor GFCIs can be purchased where electrical supplies are sold. GFCIs can also be installed permanently to household circuits by a qualified electrician.

## Holiday Candles and Other Decorations

Use only non-combustible or flame-resistant materials to trim a tree. Choose tinsel or artificial icicles of plastic or nonleaded metals. Never use lighted candles on a tree or near other evergreens. Always use non-flammable holders. To avoid eye and skin irritation, wear gloves when decorating with spun glass "angel hair." A common substitute is non-flammable cotton. Both angel hair and cotton snow are flame retardant when used alone. However, if artificial snow is sprayed onto them, the dried combination will burn rapidly. To avoid lung irritation, follow container directions carefully while decorating with artificial snow sprays.

## Holiday Plants

Many plants are toxic and cause severe stomach problems. Check with the NYC Poison Control Center and your local plant nursery before purchase. Plants that are particularly dangerous include mistletoe (berries are fatal to children and adults), Poinsettia, holly berries, Jerusalem cherry, amaryllis, and plants containing berries. Keep plants up high and out of reach of children and pets.

## RMP/PMS: A Brief Overview of Procedures

The RMP/PMS program includes process design, process technology, and process hazards analysis; operational and maintenance activities and procedures; non-routine activities and procedures; emergency preparedness plans and procedures; as well as training programs ensuring the awareness and preparedness of facilities regarding potential hazards. Specifically, the RMP/PMS program involves 13 major elements of safety surveillance written with the intent to prevent or minimize the consequences of catastrophic releases of hazardous chemicals.

- ☑ **Employee Participation;**
- ☑ **Process Safety Information** awareness;
- ☑ **Process Hazard Analysis;**
- ☑ **Operating Procedures** for safely conducting activities involved in each process covered by the RMP/PSM programs;
- ☑ **Training and Refresher Training;**
- ☑ **Contractor Evaluation;**
- ☑ **Pre-startup Safety Review** for new facilities and for modified facilities when the modification is significant;
- ☑ **Mechanical Integrity Assessment** by written procedures, training, documented inspection, and testing;
- ☑ **Hot Work Permit** certification;
- ☑ **Management of Change** requiring written procedures to manage change to process chemicals, technology, equipment, and procedures, as well as the changes in the facilities that affect a process covered by the RMP/PSM;
- ☑ **Incident Investigation;**
- ☑ **Emergency Planning and Response;**
- ☑ **Compliance Audits.** Required every three years. Because of the complexity of the work and programs involved, these audits occur every 18 months to ensure compliance with regulations. DEP target audits are performed every six months to ensure that compliance is maintained in the time between comprehensive RMP/PSM audits.

Over the years, DEP has worked to improve the RMP/PMS program both by addressing items auditors found in non-compliance of regulation and by putting in place management systems to address the root causes of audit findings (non-compliance issues). The Office of Environmental and Health and Safety Compliance (OEHSC) is DEP's central resource for ensuring that goals established by the RMP/PMS program regarding regulatory compliance and improvement are met.

**At DEP, everyone is responsible for safety. If you or anyone on your team is concerned about your working conditions, it's okay to ask your supervisor or your bureau's EH&S liaison how they can help. If you've still got questions, you can call the EH&S Employee Concerns Hotline. It's DEP's responsibility to acknowledge and fix unsafe situations, procedures, and practices. With your help, we'll not only get the job done, we'll make it safer for ourselves, our coworkers, our families, and our city.**

**CALL (800) 897-9677 OR SEND A MESSAGE THROUGH PIPELINE. HELP IS ON THE WAY.**