



AcuTech's Chemical NEP Services Can Help Your Company:

- Develop a corporate strategy for managing NEP Inspections to minimize worry and disruption of site activities
- Perform a pre-inspection site visit to flag potential issues
- Conduct an NEP gap analysis and identify potential solutions before the inspectors arrive
- Support facilities with technical assistance during and after NEP inspections
- Provide ongoing Process Safety support to the corporation and affected facilities

What is Chemical NEP?

On July 27, 2009, OSHA announced a National Emphasis Program (NEP) designed to assist the agency in verifying compliance with the OSHA Process Safety Management Standard (29 CFR 1910.119). For the next 12 months, the Chemical NEP will be implemented on a pilot basis in OSHA Regions I (ME, VT, CT, RI, NH, MA), VII (KS, NE, IA, MO), and X (ID, WA, OR, AK). Chemical facilities that are Voluntary Protection Programs (VPP) sites will not be subject to the programmed NEP inspections, but will be subjected to unprogrammed inspections in response to alleged hazardous working conditions or actual incidents.

The *Petroleum Refinery Process Safety Management National Emphasis Program* (Directive CPL 02-09-06) offers many lessons for those likely to be subject to Chemical NEP activities. The Petroleum Refinery NEP was established in response to the Chemical Safety Board's investigation report into the BP Texas City explosion and to statistics which showed a high rate of fatalities and serious injuries in the refining industry.

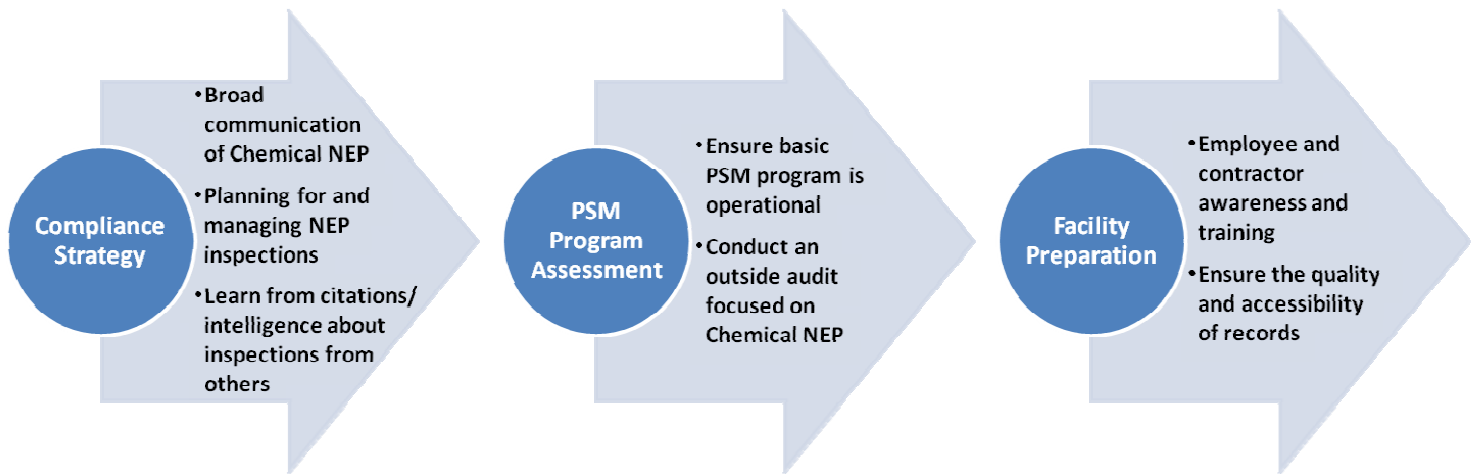
What Do We Know About Chemical NEP?

- Upwards of 15,000 facilities could be subject to federal OSHA Chemical NEP inspections. OSHA has estimated that the Chemical NEP could be an eight-year program.
- OSHA has established three categories of facilities for this program:
 - Facilities having anhydrous ammonia as a refrigerant onsite.
 - Facilities having chlorine for water treatment onsite.
 - Facilities that have other highly hazardous chemicals on site, or are using anhydrous ammonia or chlorine for other purposes.
- The Chemical NEP will use only a dynamic list of questions available in advance only to OSHA personnel. No two facilities can expect to be inspected with exactly the same set of questions since only a portion of the dynamic questions will be used.
- Depending on the type of facility inspected, OSHA has issued guidance to determine not only the number of questions, but also which questions to use during the inspection.

Chemical NEP Preparation Strategy

Chemical facilities should be prepared for the Chemical NEP. AcuTech's strategy is a multi-step approach where the first step ensures that the facility or corporation has in place a strategy to deal with the Chemical NEP. This includes coordinating with multiple sites and corporate offices to ensure there is a common approach to managing Chemical NEP inspections, including developing a standardized system to manage any citations issued during the Chemical NEP and internal communication of findings to reduce potential for the same citations to be given at multiple facilities resulting in a repeat citation.

The next step involves assuring that the PSM program is fully operational. An AcuTech audit or assessment of the facility's program focusing on NEP program targets can be helpful in this determination. The final layer of the strategy is to prepare the individual facility. AcuTech recommends informing personnel (both full-time and contractors) that may be involved in the pilot NEP of the upcoming potential inspection. In addition, it is critical that the facility records related to PSM be in order and easily accessible during an inspection. Preparation for the Chemical NEP is key to reducing regulatory liability, but also to ensure a safe and productive workplace for all employees. AcuTech can assist facilities or corporations with any or all of these strategic steps to ensure success.



Why AcuTech for Chemical NEP?

- AcuTech is expert in auditing and was selected to be the lead author of the *CCPS Guidelines for Auditing Process Safety Management Systems, 2nd edition*.
- AcuTech provides PSM and RMP auditing services to a large number of chemical facilities.
- AcuTech has delivered training seminars on PSM to OSHA compliance officers at the OSHA Training Institute and has conducted public training on various aspects of PSM including PHA, LOPA and process safety management auditing.
- AcuTech was nominated by BP and approved by OSHA to serve as the “PSM Expert” to carry out a comprehensive PSM audit at the Texas City Refinery and perform various other activities aimed at reviewing and evaluating the robustness of PSM and related programs and management systems. AcuTech also performed a PSM audit of BP's Chemical Plant at Texas City at the same time.
- In conducting PSM compliance audits, AcuTech has used many different protocols including our own “Continuous Safety Improvement” (CSI) audit approach.

About AcuTech

The AcuTech Consulting Group is a global consulting company offering a full range of management and technical consulting, training services, and software products to assist companies with Process Safety, Risk Management, and Process Security, and Emergency Management. AcuTech offers a unique background in process safety and security, design, operations, inherent safety, fire protection, and security that provide our clients with practical, cost-effective solutions for the new challenges of safety and security management.

Contact us at 703.245.3015 or send us an email at help@acutech-consulting.com to learn how AcuTech's services can help you.

