

US EPA ARCHIVE DOCUMENT

CHAPTER 5: MANAGEMENT SYSTEM

5.1 GENERAL INFORMATION (§68.15)

If you have at least one Program 2 or Program 3 process (see Chapter 2 for guidance on determining the Program levels of your processes), the management system provision in § 68.15 requires you to:

Develop a management system to oversee the implementation of the risk management program elements;

Designate a qualified person or position with the overall responsibility for the development, implementation, and integration of the risk management program elements; and

Document the names of people or positions and define the lines of authority through an organizational chart or other similar document, if you assign responsibility for implementing individual requirements of the risk management program to people or positions other than the person or position with overall responsibility for the risk management program.

ABOUT THE MANAGEMENT SYSTEM PROVISION

Management commitment to process safety is a critical element of any facility's risk management program. Since the program requires ongoing implementation of accident prevention and emergency response measures, management commitment does not end when the risk management plan is submitted to EPA. For process safety to be a constant priority, facility personnel must remain committed to every element of the risk management program.

By satisfying the requirements of this provision, you are ensuring that:

The risk management program elements are integrated and implemented on an ongoing basis; and

All groups within a source understand the lines of responsibility and communication.

5.2 HOW TO MEET THE MANAGEMENT SYSTEM REQUIREMENTS

Sources covered by this rule are diverse, so you are in the best position to decide how to appropriately implement the risk management program elements at your facility. Therefore, the rule provides considerable flexibility in complying with its program requirements.

WHAT DOES THIS MEAN FOR ME AS A SMALL FACILITY?

As a small facility that must comply with this provision, you most likely have one or two Program 2 or 3 processes. To begin, you may identify either the qualified person or position with overall responsibility for implementing the risk management program elements at your facility. As a small facility, it may make sense and be

practical to identify the name of the qualified person, rather than the position. Recognize that the only element of your management system that you must report in the RMP is the name of the qualified person or position with overall responsibility. Further, changes to this data element in your RMP do not trigger a special update of your RMP (although such changes must be reflected in RMP updates submitted for other reasons - see Chapter 9 for more information on RMP updates).

Identification of a qualified individual or position with overall responsibility may be all you need to do if the person or position named directly oversees the employees operating and maintaining the processes. You must define the lines of authority with an organizational chart or similar document only if you choose to assign responsibility for specific elements of the risk management program to persons or positions other than the person with overall responsibility. For a small facility, with few employees, it is likely that you will meet the requirements of this provision by identifying the one person or position with the overall responsibility of implementing the risk management program elements. If this is the case, you need not develop an organizational chart.

Even if you meet the requirements of this section by naming a single person or position, it is important to recognize that the person or position assigned the responsibility of overseeing implementation must have the ability and resources to ensure that your facility and employees carry out the risk management program, particularly the prevention elements, on an continuing basis. Key to the effectiveness of the rule is integrated management of the program elements.

WHAT DOES THIS MEAN FOR ME AS A MEDIUM OR LARGE FACILITY?

As a medium or large facility you may have more personnel turnover than smaller sites. For this reason, it may make more sense at your facility to identify a position, rather than the name of the specific person, with overall responsibility for the risk management program elements. Remember that the only element of your management system that you must report in the RMP is the name of the qualified person or position with overall responsibility. Also note that changes to this data element in your RMP do not require you to update your RMP.

As a relatively large or complex facility, you may choose to identify several people or positions to supervise the implementation of the various elements of the program; therefore, you must define the lines of authority through an organizational chart or similar document. Further, most large facilities already have likely developed and maintained some type of documentation defining positions and responsibilities. Any internal documents you currently have should be the starting point for defining the lines of authority at your facility. You may find that you can simply use or update current documents to satisfy this part of the management system provision. Exhibit 5-1 provides a sample of another type of documentation you may use in addition to or as a replacement for an organization chart.

Defining the lines of authority and roles and responsibilities of staff that oversee the risk management program elements will help to:

Ensure effective communication about process changes between divisions;

Clarify the roles and responsibilities related to process safety issues at your facility;

Avoid problems or conflicts among the various people responsible for implementing elements of the risk management program;

Avoid confusion and allow those responsible for implementation to work together as a team; and

Ensure that the program elements are integrated into an ongoing approach to identifying hazards and managing risks.

Remember that all of the positions you identify in your documentation will report their progress to the person with overall responsibility for the program. However, nothing in the risk management program rule prohibits you from satisfying the management provision by assigning process safety committees with management responsibility, provided that an organizational chart or similar document identifies the names or positions and lines of authority.

EXHIBIT 5-1 SAMPLE MANAGEMENT DOCUMENTATION

Position	Primary Responsibility	Changes	Responsibility re: Changes
Operations Manager	Developing OPs Oversight of operation On-the-job training On-the-job competency testing Process Safety Information Selecting participants for PHAs, Incident investigations Develop management of change and	New Equipment New Process Chemistry New Process Parameters New Procedures Change in Process Utilization	Inform head of training Inform head of maintenance Inform lead for PHAs Inform hazmat team as needed Inform contractors
Training Supervisor	pre-startup procedures Develop, track, oversee operator Training program On-the-job competency testing Set up and track operator refresher Setting training for maintenance Work with contractors	New Equipment New Process Chemistry New Process Parameters New Procedures Change in Process Utilization New regulatory requirements	Revise training and refresher training courses Revise maintenance courses, as needed Inform other leads of need for additional training
Maintenance Supervisor	Develop maintenance schedules Oversee and document maintenance Revise schedules as needed	New Equipment New Process Chemistry New Process Parameters New Procedures Change in Process Utilization	Inform operations manager of potential problem areas Inform training supervisor of any training revisions Inform contractors Revise schedules
Hazmat Team Chief	Develop and exercise ER plan Train responders Test and maintain ER equipment Coordinate with public responders Select participants in accident	New Equipment New Process Chemistry New Process Parameters New Procedures Change in Process Utilization New regulatory requirements	Revise the ER plan as needed Inform operations manager of problems created by changes Work with training supervisor to revise training of team and others

investigations

EXHIBIT 5-1
SAMPLE MANAGEMENT DOCUMENTATION

Position	Primary Responsibility	Changes	Responsibility re: Changes
Health and Safety Officer	Oversee implementation of RMP Develop accident investigation procedures Oversee compliance audits Develop employee participation programs Conduct contractor evaluations Track regulations	New Equipment New Process Chemistry New Process Parameters New Procedures Change in Process Utilization New regulatory requirements	Inform all leads of new requirements and assign responsibilities Ensure that everyone is informed of changes and that changes are incorporated in programs as needed