ExxonMobil

PSM / RMP Compliance Audit Overview

Purdue Process Safety and Assurance Center(P2SAC)

Tim Hoff – EMTech Process Safety Engineering Projects SME

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Why Do We Audit?

The purpose of these reviews is to satisfy the auditing responsibility under OSHA's regulation "**Process Safety Management** of Highly Hazardous Chemicals [29 CFR 1910.119, paragraph (o)], and EPA's **Risk Management Program** (RMP) rule [40 CFR 68.79].

- Because these **two federal regulations have nearly identical requirements** for the development and implementation of an accident prevention program, the term "process safety management" or PSM is often used generically to refer to management systems in place to meet the requirements of both regulations.
- Employers are required to **certify, at least every 3 years**, that they have evaluated compliance with PSM and RMP requirements to verify that procedures and practices developed under the standards are adequate and being followed.
  - Since the PSM and RMP requirements are very closely aligned with EM's Operations Integrity Management System (OIMS) elements, the tri-annual PSM and RMP audits can be performed during periodic OIMS External Assessments or may be performed by stand-alone audit teams when frequencies do not align.

How Do We Audit?

- PSM / RMP audits are typically conducted over a 3-week period:
  - **Virtual portion is ~2 weeks .** Majority of pre-work and analysis is done by the audit team virtually on a part-time basis from home base location.
  - **Onsite portion ~1 week.** All or a subset of the audit team complete field verifications and observations on behalf of the entire audit team. Protocols are completed by auditors and reviewed by site facilitator in advance of sharing a 1-pager at the close-out meeting.
- Audit tools are stored in a **SharePoint** repository which is deleted after issuance of the final report.
- Audit teams typically consist of 3 - 6 personnel based on size of facility being audited. Auditors are assigned PSM / RMP elements with corresponding **protocols (14)** which have been developed to ensure applicable regulatory requirements are verified. Completed protocols shall be retained by the site, along with a written report, as evidence of the audit.
- **Audits require discipline and planning by audit team and site personnel.** Audit starts ~3 to 4 weeks prior to onsite portion.

Audit Tools – Site Information Request

PSM / RMP Element(s)	Audit Team Documentation Request	Site Status of Request	Field Verification / Observations
Process Hazard Analysis **OIMS 2.1**	1. OIMS 2.1 System Documents 2. OIMS 2.1 Improvement Plans 3. Most recent OIMS assessment reports 4. List of all HAZOPs since the last PSM/RMP Audit 5. Copies or links to ~10 HAZOP/PHA reports 6. Copy of site HAZOP procedure 7. List of all open HAZOP findings w/ currently accepted risk level indicated. 8. HAZOP Schedule 9. Site HAZOP Facilitator Job Responsibility Check List 10. Site Process Hazard Analysis Protocol (if separate from System documents) 11. OIMS metrics associated with Process Safety Management 12. OIMS 2.1 Procedure 1: Risk Analysis, Assessment and Management Procedures 13. OIMS 2.1 Procedure 2: Risk Management Program Schedule 14. OIMS 2.1 Procedure 4: Use of Chemicals and Refining Risk Matrix 15. Chemicals and Refining Risk Matrix	1. 2. 3. 4. a. *F Reactor – May 2018 (example)* b. c. d. e. f. g. h. i. j. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15.	1. 2. 3. 4. a. b. c. d. e. f. g. h. i. j. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15.
Process Safety Information **OIMS 3.1 & 4.1**	1. Copy of most recent Safety Relief Review 2. Safe Operating Committee (SOC) endorsement of deviations from DP/GP 3. SOC Charter 4. SOC meeting minutes - 10 most recent meetings 5. Fixed Equipment Quality Assurance (FEQA) Manual 6. HAZOP Application Guide 7. OIMS 3.1/4.1 System Documents 8. Equipment Strategy Reports 9. Site Safety Data Sheets (SDS) 10. Site chemical compatibility matrices 11. OIMS 2.1 Procedure 5: Risk Communication	1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11.	1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11.

- Additional data requests may be initiated by audit team

Audit Tools – Protocols

1910.119(c) and 68.83: Employee Participation – OIMS 1.1

Item	Question	Assessment/Evaluation	Observations
A.	**Records Review**		
1.	Does a written program exist regarding employee participation? (1910.119(c)(1)) and 68.83(a))	**YES** Typically, employee participation policy is available on site's OIMS SharePoint Library and available to all personnel. Typically, OIMS 1.1 System Document identifies employee participation as a key element of OSHA PSM and EPA RMP compliance and success.	Employee participation policy is in SOP-201 Safety Policy and available online to all personnel. Employee participation is also mentioned in OIMS 1.1 System Document and is available online to al personnel.
2.	Does the written program include consultation with employees and their representatives on the conduct and development of process hazard analyses and on the development of other elements in the PSM / RMP standards? (1910.119(c)(2)) and 68.83(b))	**YES** Typical site Process Hazard Analysis Protocol includes a process to request employee input from unit operations personnel (via one of the following methods: • E-mail notification with optional sign-off sheet at the control board • Field visit to each crew to solicit feedback with optional sign-off sheet. Additionally, Employee Participation Policy outlines expectations for employee engagement on each of the PSM activities	**33 of 35** recalled being asked to share input/concerns for recent HAZOPs **23 of 23** feel unit-specific knowledge and experience as an operator would be adequately taken into account and considered during a HAZOP **34 of 36** were involved recently in PSM activities: incident investigations, MOC development, procedure development, and/or work permitting **27 of 37** participated in recent HAZOPs (significant personnel changes in last 18 months) *Suggest the site increase HAZOP awareness at the operator level in the following areas:* • *Solicitation of input/concerns* • *Participation* • *Results and how they are shared/communicated*

- PSM / RMP protocols are listed on Slide 3 and are stored in SharePoint/Section 5. Reports/Category 2 PSM – RMP Draft Reports. **No surprises!**
- Question column: from regulatory citation(s) and agency interest areas.
- Assessment/Evaluation column: describes **typical** methodology of how site complies with requirement and indicates a **Yes** or **No** for meeting that requirement.
- Observations column: where Auditors document what and where was sampled including improvements and findings, if any.
- Shared with EM sites to assist in making the documentation consistent with site practices/processes as well as nomenclature.

Audit Tools – Report Out Summary

As of 5/21/2029

PSM / RMP Compliance Audit

EM Protocol Used	Assessor Highlights	Improvement Opportunities	Potential Regulatory Findings	Assessor
1.1 Employee Participation	Active involvement throughout organization.	1. Recommend updating the Employee Participation Policy as it appears it was last updated in 2019. 2024 RMP amendments around PHA, PSI and Hot Work Permits have been promulgated that could be relevant to the Policy.	None	TBD
6.2 Hot Work Permits	Site is doing an excellent job of training personnel and implementing the new RMP recordkeeping process.	1. Recommend modifying retention verbiage on bottom of Hot work permits.	None	
8.1 Contractors	Contractors were knowledgable of site processes.	None	None	
9.1 Incident Investigations	N/A	None	None	
2.1 Process Hazard Analysis	Good knowledge of risks associated with the process.	None	None	TBD
2.1 3.1 4.1 Process Safety Information	Information was well filed in the admin conference room and control room	None	None	
6.4 6.3 Mechanical Integrity	Systems are in good health.	None	None	
5.4 Training	Everyone on shift was current on all regulatory-required training; strong awareness that overdue training is not acceptable.	None	None	TBD
6.6 Trade Secrets	No restricted access to information based on claims of trade secrets.	None	None	
6.6 11.1 Compliance Audits	Compliance audits are well-recognized by the site.	None	None	
6.1 6.3 Operating Procedures	Good practice of procedure utilization and subsequent certification process.	None	None	TBD
7.1 Management of Change	Employee knowledge and understanding of MOC process.	None	None	
7.1 Prestartup Safety Review	None	None	None	
10.1 Emergency Planning and Response	Employee knowledge and communication of emergency reponse plans.	None	None	

Audit Tools - Reporting the Results

- The 14 completed protocols provide the detailed records of audit observations including improvement opportunities and findings, if any.
  - Protocols demonstrate the audit was conducted on each element of PSM / RMP thoroughly and consistent with regulatory requirements; they are the basis for the certification statement which is included in the audit report.

- The audit report is a separate document which provides an executive summary of the audit effort.
  - It documents the audit scope, team composition, certification statement, audit methodology and findings, if any. Improvements are listed in the protocols.
  - This report is the official audit record to be shared with regulatory agencies, upon request. **Requirement to retain two most recent audit reports**.
  - PSM and RMP findings are required to have a closure action plan for resolution
  - Audit report is issued from the Audit Team Lead to the Site SSHE Manager. The Audit Team Lead signs the certification statement.