

Cal/OSHA Process Safety Management Unit  
“What’s Going On”  
in  
2015

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# Life Before August 2012



# Life After August 2012



# Life after August 2012



- Coordinate revisions to the state's refinery safety regulations, known as the Process Safety Management (PSM), and California Accidental Release Program (Cal/ARP) regulations; ;
- A new financial assessment on the state's oil refineries, implemented by DIR in 2013, has given the Labor Agency and DIR the ability to expand the PSM unit from 11 personnel in 2012 to 25 today;
- Expanded PQV inspections on Refineries;
- Expanded Training;
- Interagency Enforcement Coordination;

# ***Strengthening the PSM Standard***

- In 2014, DIR convened and participated in over 20 stakeholder meetings with the petroleum refining industry pertaining to process safety, refinery workers, community-based organizations, and the public.

# ***Strengthening the PSM Standard***

- At each of these meetings, DIR presented the findings and recommendations of the Governor's report and described DIR's proposed revisions to the PSM standard to refineries for discussion and feedback.
- Three of these meetings consisted of DIR's PSM Advisory Committee, made up of invited representatives from labor and industry. All Advisory Committee meetings were open to members of the public.

# ***Strengthen PSM Regulations To Incorporate***

1. Implement Hierarchy of Controls
2. Safety Culture Assessments
3. Conduct Damage Mechanism Hazard Reviews
4. Conduct a Root Cause Analysis after Significant Accidents or Releases
5. Explicitly Account for Human Factors
6. Require structured methods to ensure effectiveness of safeguards i.e. Safeguard Protection Analysis
7. Employee Participation

# ***A New Financial Assessment on the State's Oil Refineries***

- A new financial assessment of 0.015 (one and one half cents) per barrel of crude oil on the state's oil refineries, implemented by DIR in 2013, has given the Labor Agency and DIR the ability to expand the PSM unit from 11 personnel in 2012 to 27 today.
- These funds are also supporting technical training for the new cohort of PSM CSHOs, who are undergoing 200 hours of technical training and 400 hours of enforcement training.

# Expanded PQV inspections on Refineries

## Reinventing Field Enforcement Operations

- Prior to 2013, a single CSHO conducted about 2 planned refinery inspections per year, focusing on one element of the PSM standard in a single unit of a refinery, and dedicating about 50 to 70 hours to each inspection.
- Today 4 to 5 CSHO's participate in a PQV inspection dedicating 1000 to 1200 hours to each refinery.

# ***Reinventing Field Enforcement Operations***

*continued...*

- Conducted the following inspections in refineries this past calendar year;
  - 2 Accidents; average hours per inspection 528/hrs.
  - 2 Complaints; average hours per inspection 689/hrs.
  - 2 PQV's; average hours per inspection 1530/hrs.

# ***Expanded Training***

***for new compliance officers hired April 2014***

- PSM Training
  - 3300 PSM for refineries 40 hours
  - 3400 PSM for Chemical Facilities 40 hours
  - 3430 Advanced PSM 80 hours
  - Advanced PHA Methodologies (CCPS) 40 hours
  - Field Training – 175 hours
  - DOSH Training – 225 hours
- Total Hours to Date – 600 hours

## ***Interagency Enforcement Coordination***

- Today, three to five compliance officers are leading joint inspections with the Interagency Refinery Task Force. They are joined by one or more compliance officers each from the Local Environmental Health Agency, the Air Quality Management District, and U.S. EPA, for a total complement of 8 to 9 compliance officers participating in a refinery inspection with Cal/OSHA.

# Additional Refinery Taskforce Recommendations

- Facilitate coordination of enforcement activities, including cross-referrals, cross-training, and joint or coordinated inspections and auditing, as appropriate.
- Facilitate the development of an information and data sharing system among state, local and federal agencies to include information about inspections, compliance, injuries, emissions, and enforcement activity as well as the means to collect information identified in reports, a process for timely flow of information and a process for public dissemination.

***What will 2015 bring to refineries in California?***

## SB 1300 on Refinery Turnaround Work

Deferred maintenance...  
The Legislature passed and the Governor signed SB1300, which now requires refineries to provide Cal/OSHA with their turnaround schedule for the following year. On September 15<sup>th</sup> of the current year refineries in California are required to submit their following year turnaround schedules;



# SB 1300 Refinery Turnaround Work

- Cal/OSHA will select one refinery in N. CA and one in S. CA to open an inspection.
- 60 days prior to the turnaround, the chosen refinery must submit to Cal/OSHA the scope of work and justification for any deferred maintenance.
- Once turnaround starts Cal/OSHA may conduct inspections on contractors for compliance with Title 8 regulations.
- Cal/OSHA will take actions based on this information.

# SB 54

- This bill would require an owner or operator of a stationary source ..., when contracting for the performance of construction, alteration, demolition, installation, repair, or maintenance work at the stationary source, ...contractors and any subcontractors use a skilled and trained workforce to perform all onsite work within an apprenticeable occupation in the building and construction trades, including skilled journeypersons paid at least a rate equivalent to the applicable prevailing hourly wage rate.

# SB 54

- This bill would require the Chief of the Division of Apprenticeship Standards of the Department of Industrial Relations to approve a curriculum of in-person classroom and laboratory instruction for approved advanced safety training for workers at high hazard facilities by January 1, 2016.
- The Chief of the Division of Apprenticeship Standards of the Department of Industrial Relations may approve a curriculum of in-person classroom and laboratory instruction for approved advanced safety training for workers at high hazard facilities. That safety training may be provided by an apprenticeship program approved by the chief or by instruction provided by the Chancellor of the California Community Colleges.

# SB 54

- .....The worker has completed within the prior two calendar years at least 20 hours of approved advanced safety training for workers at high hazard facilities.....



Thank you!

