**PSM Compliance Audits**

**How Often Are They Needed? What’s Involved?**

Companies that fall under Process Safety Management (PSM) requirements because of their highly hazardous chemicals are required to recertify that you have done an evaluation of your compliance. [*For more about what PSM is,* [*check out our blog “What is PSM?”*](https://isienvironmental.com/what-is-psm-blog/)]

Compliance evaluations must occur at least once every 3 years. Companies must certify that PSM compliance has been evaluated in order to verify that procedures and practices being followed are adequate and are being followed.

The audit needs to be planned ahead of time with plans for ensuring compliance, documenting findings, determining corrective actions and including field inspections of safety and health conditions and practices.

**The Team**

Audit team members should be chosen based on their experience, knowledge, training and familiarization with the standard. Smaller companies may be able to have teams as small as one, but larger companies like refineries with 3 or 4 processes may need a team of 5-6 people over the course of 1-2 weeks. You can use your own personnel, personnel from other plants, or consultants to conduct the audit.

**The Audit**

The audit should:

* Make sure all PSM requirements are being followed;
* Identify elements that need special attention;
* Review pertinent documentation with samples large enough to ensure the audit results accurately reflect compliance;
* Inspect the physical facilities to observe actual practices;
* Interview all levels of plant personnel to determine awareness/knowledge of PSM requirements, safety procedures, and emergency procedures; and,
* Record any deficiencies.

**Report of Findings**

Following the audit, a report of findings should document the results, and that should be signed by a responsible manager. This becomes the official certification. If you use an outside consultant as the auditor, the employer still needs to make that certification, not the consultant.

The report should include facts and information to support the audit did indeed determine and review compliance. It should document corrective actions required and document any findings so that they can be compared to future audits to determine trends. Additional observations discovered can also be included.

Deficiencies should be described, given milestones, tracked and assigned to affected personnel, then periodically followed up on. Anything that was logged as a deficiency where no corrective action was taken needs to have explanations on why it wasn’t followed up on.

**Recordkeeping**

Companies are required to keep their two most recent compliance reports on file. You do not need to turn those in to OSHA, just keep them on file and available for inspection. Some companies choose to destroy earlier reports because they tend to list more findings on them. Some companies also choose to do their reevaluations every 1-2 years for that reason as well.

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Need help with PSM? Contact iSi today! We can help you get compliant with your 14 PSM elements, conduct or participate in your recertification audit, or help you correct findings.