

COMPLIANCE CONNECTION

June / July / August 2020

Vol 4 Issue 3

A bimonthly newsletter designed to help you navigate the ins and outs of compliance and the safe practice of industrial refrigeration.

Emergency Response Plan

By: IC Staff

As we all know, it is imperative that we can rely on our Emergency Response Plans. This is no groundbreaking concept. Yet we often find that we have these cumbersome documents, but cannot access the information quickly. Time management directly impacts the outcome of an event.

Additionally, there are unknown variables in these scenarios that cannot be predicted. For example, an event can occur in the middle of the night, weather could play a role, untrained employees may be on site and forced into unknown circumstances, and the list goes on and on. However, there are some controls in these situations that are fairly concrete and need to be second nature and common knowledge when an event occurs.

One such control is having the contact information for team members and all parties required during a response easily accessible within your Emergency Response Plan. Make certain a team member is updating these contacts throughout the year, as employees move, change jobs or even change their cell phone numbers. It is also incredibly valuable to have the contact information broken down by shifts and positions within each shift.

Incident Command is the basis for a clear and efficient response, thus Incident Commanders should be on site around the clock if at all possible. If this is not feasible, then employees should know how far out the ideal Incident Commander is during his/her off shift. And if there is no Incident Commander in the building during the time of an

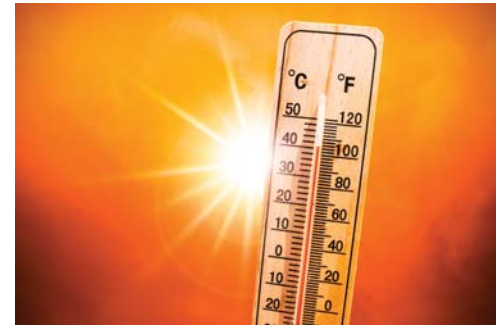
event, you must make sure those on the team know how to react in the moment.

Some other questions to consider in advance that are well within your control are:

- *Should the employees start a response, or should they simply focus on accounting for all personnel?*
- *Is there a minimum of five available team members during any shift?*
- *Are the team members present on each shift, ones that your company would feel comfortable utilizing as responders?*

We are often shocked to hear how few employees are on site overnight. The majority of releases and accidents occur during the wee hours of the morning, yet we practice in perfectly controlled environments, as if a response will occur Monday through Friday between 9am and 5pm. We are aware this is the most opportune time to practice, but it is imperative you don't overlook those few team members that are often solo overnight. If this is a concern, we recommend adding team members during those time periods.

In order to be offensive in regards to a response, your company must train at a minimum of a 24-hour course; however, you can add members who attend an 8-hour awareness course to your team. If you feel you have plenty of responders and/or decontamination members, yet are concerned about covering each shift, this can be a great remedy. Having knowledgeable and effective responders is important in an event, but also having



It's not the heat ... it's the humidity

Not necessarily true in all cases....

Most of us have had some sort of safety training — right? Sure we have. But do we always pay attention to the warning signs when they apply to ourselves? Too often we think, or rather don't think, until its too late and we end up in a compromised situation.

So please, take some time to read the important reminder about working in summer heat. OSHA has supplied an excellent bullet list that is a quick read and just might save a trip to the ER.

<https://www.osha.gov/news/newsreleases/trade/06302020>

the logistical, organized leaders who can react and execute is equally pertinent.

Having an Emergency Response Plan is required, but it is useless if it is not easily accessible in an emergency situation and your employees are not prepared to utilize it. Additionally, it is imperative your company controls as many factors as are possible, so when faced with unknown variables, those can be more easily contained. This will help your employees feel more comfortable in an emergency situation, and will likely reduce the amount of damage done and save lives.

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Process Safety Management

By: David "Safety Man" Bennett

When I embark on a survival trip, I always try to push myself to my limits. One way I do this is by taking a minimal amount of supplies and I never bring food with me. Therefore, it is important to know which plants and bugs will cause a reaction in my body and how to respond if they are toxic to me.

Before I leave, I research the environment I plan to visit to see what I might encounter and what might prove hazardous. I do this by reading survival books and papers others have written to learn what they have experienced and how they overcame the situation they were in. Additionally, I practice my skills and trade by placing myself in different types of scenarios. It is wise to invest time to learn how to handle various situations before you find yourself faced with a hazard.

The same principal can be applied at your facilities. In C.F.R 1910.119 APPENDIX D, the Process Safety Information section of this code, it mandates that you know all the hazards that come from operating and maintaining an ammonia system. It is imperative you are aware of the dangers in the event that you encounter any hazardous situations. Some of the items covered are fire and explosion hazards of chemicals, reactivity of chemicals when mixed with one another and the atmosphere, along



with the health hazards to you and your employees.

This section also includes a block flow and process flow diagram of the system. This is a basic flow diagram of your system. The process flow diagram is slightly better because it shows more of the important features necessary if an event were to occur at your plant. It includes information such as pressure and temperature, major vessels, headers and heat exchangers. It also contains valve numbers in the drawings that match up to the ones in your plant. Important note: if you have had any additions, all sets of drawings should be updated as well. It is important to know and understand how to read and follow these diagrams, because they specify how to locate a particular valve in the event of an emergency. It is imperative for the numbers to match up or the operator may isolate an incorrect valve resulting in further emergency.

The elements in the Process Safety Management program are required and incredibly important. They cover a broad range of topics each equally crucial. But knowing and recognizing the hazards associated with operating and maintaining an ammonia system could mean the difference between life and death and prove critical in salvaging the business. The same is true of my survival trips. It is imperative we are aware of the risks associated with any endeavor in order to combat and emergency in an efficient and effective manner.

— As always, be safe and be prepared

What We Do ...

Process Safety Management

- PSM Program Workshop
- PSM Program Development
- Risk Management Program
- SOP/MOP Workshop

HAZMAT Training

- First Responder Training
- Emergency Responder
- HAZWOPER
- Incident Commander

Ammonia Refrigeration

- Refrigeration Operator
- Refrigeration Review Course
- Valve Tagging & Labeling
- RETA Exams

Safety Training & Services

- Emergency Action Plan
- Forklift Training
- Hazard Communication
- Lockout / Tagout

Training Opportunities With Respect For Your SAFETY

COVID-19 continues to present us with unprecedented challenges that we all face on many different levels. We are committed to making training accessible for you and your staff SAFELY with honesty and integrity.

We're here to facilitate and provide the training you need to keep your facility safe and running smoothly. We offer on- or off-site classes and can create programs customized to your needs. Take a look at page 3 of this newsletter, or, if you prefer a more personal approach, give us a call at 1-918-274-8639 and let us work a little magic for you!



Your Compliance Connection

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**Industrial
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2020 - 2021 TRAINING SCHEDULE

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SEPTEMBER 2020

CLIVE, IA

Sept. 15 8 Hr ERT Refresher
Sept. 16-18 24 Hr Emergency Response

PLYMOUTH, MN

Sept. 22-24 24 Hr Emergency Response*
Sept. 24 8 Hr ERT Refresher*
Sept. 25 8 Hr Incident Command*
Sept. 25 8 Hr ERT Refresher*

OCTOBER 2020

HARRISBURG, PA (HUMMELSTOWN, PA)

Sept. 28-30 24 Hr Emergency Response
Oct. 1 8 Hr ERT Refresher
Oct. 2 8 Hr ERT Refresher

YUMA, AZ

Oct. 6 8 Hr ERT Refresher

WARRENVILLE, IL

Oct. 20-22 24 Hr PSM/RMP Workshop
Oct. 20-22 24 Hr Emergency Response
Oct. 20-23 32 Hr Level I Refrigeration Operator
Oct. 22 8 Hr ERT Refresher
Oct. 23 8 Hr Incident Command
Oct. 23 8 Hr ERT Refresher

NOVEMBER 2020

MIDDLE RIVER, MD

Nov. 3-5 24 Hr Emergency Response
Nov. 4 8 Hr ERT Refresher
Nov. 5 8 Hr ERT Refresher

HILLARD, OH

Nov. 11-13 24 Hr Emergency Response*
Nov. 13 8 Hr ERT Refresher*

DECEMBER 2020

SANTA MARIA, CA

Dec. 7-9 24 Hr Emergency Response*
Dec. 10 8 Hr ERT Refresher*
Dec. 11 8 Hr ERT Refresher*

DELMAR, DE

Dec. 7-9 24 Hr Emergency Response*
Dec. 9 8 Hr ERT Refresher*
Dec. 10 8 Hr ERT Refresher*

JANUARY 2021

WARRENVILLE, IL

Jan. 19-21 24 Hr Emergency Response
Jan. 21 8 Hr ERT Refresher
Jan. 22 8 Hr Incident Command
Jan. 22 8 Hr ERT Refresher

**Select class of interest
to access details and
registration information**

FEBRUARY 2021

FT WAYNE, IN

Feb. 1-3 24 Hr Emergency Response
Feb. 4 8 Hr ERT Refresher
Feb. 5 8 Hr ERT Refresher

VIRTUAL VIA ZOOM

PLYMOUTH, MN

Feb. 9-11 24 Hr Emergency Response*
Feb. 11 8 Hr ERT Refresher*
Feb. 12 8 Hr Incident Command*

MARCH 2021

KULPSVILLE, PA

Mar. 23-25 24 Hr Emergency Response
Mar. 23 8 Hr ERT Refresher
Mar. 24 8 Hr ERT Refresher
Mar. 25 8 Hr ERT Refresher

APRIL 2021

DELMAR, DE

Apr. 6-8 24 Hr Emergency Response
Apr. 6 8 Hr ERT Refresher
Apr. 7 8 Hr ERT Refresher
Apr. 8 8 Hr ERT Refresher

WARRENVILLE, IL

Apr. 20-23 32 Hr Level I Refrigeration Operator
Apr. 20-22 24 Hr Emergency Response
Apr. 22 8 Hr ERT Refresher
Apr. 23 8 Hr ERT Refresher
Apr. 23 8 Hr Incident Command

HURST, TX

Apr. 26-27 16 Hr CARO/CIRO Review

Cancellation Policy

Industrial Consultants reserves the right to cancel any course due to insufficient enrollment. Students enrolled in a cancelled course are entitled to a full refund or the payment may be transferred to another course. If you choose to withdraw from a course, you must do so no later than 15 days prior to the course start date. No refunds will be made if the student drops the course after this time. If you fail to cancel and do not attend the class, your payment will be forfeited, and may be subject to a cancellation fee. A person who is registered and is unable to attend, may at no additional cost, send a substitute.

About Us ...

Industrial Consultants, LLC is celebrating our third decade of service providing the training needs for companies like yours. Companies that must comply with health and safety regulations enacted by the Occupational Safety and Health Administration and the Environmental Protection Agency.

Industrial Consultants, LLC is focused on the cold storage and food industries, due to the large number of refrigeration systems using anhydrous ammonia, for which safety and health regulations are very strict. These regulations are ever changing, with nearly every aspect of your business being impacted by OSHA and EPA. Expertise is needed at all levels to ensure compliance. We continue to provide this expert assistance and guidance to help meet all your compliance needs.

We are totally dedicated to assisting you in achieving your compliance goals, taking the mystery out of compliance, and helping you gain control of your safety and training needs.

Let us be Your Compliance Connection™.

Compliance Without Confusion:

- Emergency Response Training
- Incident Commander Training
- Ammonia Refrigeration Training
- RETA CARO/CIRO/CRES Training
- Process Safety Management(PSM)
- Process Hazard Analysis(PHA)
- Compliance Audits
- EPA Risk Management Programs
- Safety Support Services
- Boiler Operator Training
- Plant Optimization Programs
- Mechanical Integrity Inspections

Each of these widely differing programs must meet specific OSHA and / or EPA requirements for training your operating and safety personnel. This is the essence of compliance. However, continuing annual compliance is certainly not simple. Industrial Consultants, LLC can take the mystery out of compliance and help you gain control of your safety and training needs.

We have been training safety and operating personnel for more than 30 years. Thousands have benefitted from our current, comprehensive, complete and accurate training. You may rely on Industrial Consultants, LLC to keep your organization current on the ever changing OSHA and EPA training requirement for your facility.

rev 08/03/20