

# API ANSI RP 754

Implementation Conference Call

December 12, 2011

# Purpose of RP 754 Conference Calls

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- To drive broad adoption of API 754 throughout the Refining and Petrochemical industries
- To drive consistency in Tier 1 and 2 metrics reporting in order to establish credibility and validity
- To share learning's regarding the effective implementation of Tier 1-4 lagging/leading metrics

# Today's Agenda

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- Key messages from 2010 data collection
- Info sheet – “Why is *work-hours* the PSE rate normalizer?”
- 2011 Data Collection: Feb 1 – Mar 1, 2012
- New spreadsheet instructions
- Encourage reporting to both API/NPRA (including international site data)
- Inform – upcoming NPRA database webinar
- QA

## Key Messages & Learnings – RP 754 Ad-hoc Group

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- It will take a few years to ensure data consistency and validity - as was expected
- Encourage Tier 2 data reporting at your sites - leading indicator of larger potential releases
  - Make it easy to report, provide positive reinforcement for reporting
- Don't over-focus on the 2010 Tier 1 PSE rate but instead build confidence in your data through consistent reporting
- Consistency is more important than accuracy
- Trends over time are more valid than specific rates
- Ad-hoc group will ensure the size of refinery doesn't unfairly impact the PSE rate based on work-hours normalizer before going public in 2013 with the "Industry Tier 1 PSE Rate / Count"

# PSE Rate “Normalizer” Discussion

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- API RP 754 uses “total work hours” as the normalizer for PSE Rate
  - This is the same number typically used to calculate Occupational Injury and Illness (OII) rates
- Early indications - this normalizer might magnify smaller site PSE rates
  - API and NPRA are considering reporting PSE rates by size of facility (small, medium, large)
  - API and NPRA are considering “average PSE events per site” as additional metric based on facility size

# Reasons for Using “Total Work Hours”

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- Easy to capture since it is already used for OII reporting
- Easily understood and recognized by external stakeholders
- Bridge between refining and petrochemical (i.e., throughput not always applicable in petrochemical sites)
- Demonstrated by the MKOPSC\* that it provides the same directional and order-of-magnitude answer as **throughput**
- Reported by one company that it provides the same directional and order-of-magnitude answer as a **complexity-weighted capacity approach**
- Reported by one company that it provides the same directional and order-of-magnitude answer as **equipment count**

# 2011 Data Reporting

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- Submit data as early as February 1, 2012 **but no later than March 1, 2012.**
- Begin populating your spreadsheet now, don't wait until February.
- On-time data submittal allows the adhoc group to analyze the data (blinded) in preparation for sharing key learnings during the May 2012 National Occupational and Process Safety Conference & Exhibition.

# Spreadsheet Instructions

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- 2011 spreadsheet is very similar to last year's with the following changes:
  - All facilities and general information should be entered into the 'Facility Information' tab (reduced from 3 tabs to 2 tabs)
  - When entering Events on the 'Event Information', make sure the facility name (column B on first tab) matches exactly.
  - 'Facility Information' tab now includes an option to report that you had 'No Tier 1 Events', 'No Tier 2 Events', or 'No Tier 1 or Tier 2 Events'.
  - There is now a drop-down menu of petrochemical processes from which to choose (not just refinery processes).
  - 'Mouse-overs' are provided for additional definitions and guidance on entering the data



# Spreadsheet Instructions, continued

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Three areas that require clarification based on the 2010 data submittals:

1. PRD Discharges--*please see the attached slides from the September 26th Webinar (also posted at: <http://www.api.org/ehs/health/webinars.cfm>)*

2. Contractor Hours Include:

- Embedded contractors
- Specialty contractors
- Project hours (if not major construction)

Contractor hours DO NOT include:

- delivery drivers
- large-scale projects that are typically fenced-off and not connected to the existing process (e.g., major construction)

3. PSE Consequences

- List all consequences for the Tier— e.g. list both Threshold Release Quantities and number of Days Away from Work or Fatalities.

Exception: If the event is a fire or explosion, the chemical-released quantity is not required to report. (Basis: Chemical released is consumed by the fire/explosion.) However, if the fire/explosion results in secondary release points the site shall report threshold quantities of other chemicals released.

- Do not list Tier 2 consequences in Tier 1 **except** for those related to human impact (i.e. employee, contractor, or sub-contractor recordable injuries )

# Encourage Reporting

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- Companies are encouraged to submit all site data (including international sites) to both API and NPRA
  - RP-754 intended for global adoption
  - Sufficient data needed to compare performance with Europe, Asia-Pacific and other regions
  - Reporting to both trade associations supports data accuracy cross-checking
  - Easy to do – single spreadsheet
  - Not required to be an API/NPRA member to submit data and receive confidential/blinded report
- Strength in numbers
  - As an industry we were able to get over the public-reporting hump for Occupational Injury/Illness leading to significant industry-wide improvement over time
  - By submitting data to API/NPRA now, a company is able to benchmark during this initial “grace” period (RP-754 is voluntary. To comply with the RP a company must publically report Tier 1 PSE Rate. )

# NPRA Database webinar

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- NPRA Database changes being made to accommodate PSE data entry directly from members in the future
- One Process Safety data administrator per company
  - This single company administrator can grant data-entry permission to multiple site administrators but will be required to “approve” the data entries before posting
- There will be a webinar on January 17<sup>th</sup>, 2012 to explain changes to the NPRA database and how to submit data
- Contact Lara Swett at [LSwett@npra.org](mailto:LSwett@npra.org) for further information.

# API website

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- API RP 754 Fact Sheet
- Series of four webinars presented in fall 2010 (available for viewing)
- Listing of FAQ's that help you properly classify a PSE
- API Guide to collecting PSE data
- Read-only access to API RP 754
- Contact Karen Haase at [Haasek@api.org](mailto:Haasek@api.org) for more information
- To submit your RP-754 data spreadsheet, email it to Alexis Tressler at [Tresslera@api.org](mailto:Tresslera@api.org).

<http://www.api.org/ehs/health/measuring/index.cfm>

# Q and A

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