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Interview with Bill Ralph

Tremont, Hotel, Galveston, TX
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Hired in TXC 1983, Graduate of Georgia Tech. Worked in engineering roles. Then did some work in oil movements, was in operations in oil movements. Worked on reformulated gasoline, moved to PSM role November 91.

Process safety traditionally in the line organization. Process safety committee in place in TXC for a long time. The PSM group formed after OSHA 1910.119. Before that, we reported to comm. We then started a group and _____

- First thing we did was hazard operations analysis.
- We do the formal start-up processes
- Incident review process. Lessons learned.

We thought we were pretty well along the path when OSHA 1910.119 introduced. We had to create some new procedures. I came into group as Superintendent (PHM is title). Four people in group reported to George Carter head of process safety committee. Reported to George '94-'97, then we reported to Lee Valentine to 2002, John Curly 2002-05, now to Kathleen Lucas.

The pattern was broken in August 2004.

Merger, creation of BP SHIS. Lee Valentine left operations and Curly replaced him as head of Process Safety Committee. Lee went to non-operations role. But since Lee still in Refinery, we kept reporting to Lee; so outside the line organization first time in 50 years. Lee eventually left, reported to Norine Stein for 18 months. Third quarter 2004 reports to HSSE (eventually Joe Barnes). Since Lee left, significant drop in interest in PSM and what committee did.

John Curly came from Chemicals. Our PSM Committee was foreign to him.

Kathleen has been consumed with everything. Administratively, we report to Lee then Norine then Kathleen. While the PSM Committee still existed, there was a cultural change with BP. We went on road shows to explain what we did, but others did not have a similar system. We did a lot of some things. But the emphasis seemed to be different.

Q: Where do you see PSM in BP?

A: There is not much of a central resource anymore. We do talk to each other at different sites, but no one has the time to really dig in if they have a full-time job elsewhere.

Q: Who would you call now?

A: Depends on the issue. I might call persons in Tech Support group. There is a process safety advisor in R&M, but one or two people.

Q: 2000 – 2004.

A: First Refinery and Chemical plant joined. We spent a lot of time developing integrated policies. Then, we formed SHIS – and again tried to create committee procedures. Later, that is unwound. Lot of energy just running in place. TXC did not really advance much during this time. Chocolate Bayou gained from this exposure to refinery practices. Management was losing interest during this time. I (Bill Ralph) am pushing things, but I really don't get much response. I asked Rick if I could go to his leadership team meetings, he said yes. Don Parus at one point decided he was going to have monthly themes. One set aside for HSSE. So he told Lee and I to bring in PSM, meeting scheduled but cancelled. People were part of a group that did not grow up with process safety--compared to old leadership. We never synchronized how PSM fit in the organization; it was adrift in the organization.

At the PSM Committee meetings, we discussed a lot of things, specifics to a unit. Our committee picked up new trends, etc. Lessons learned from an Exxon issue, George Carter could then go in and get budget for it. Persons who had action over-dos would visit the Committee. Our process safety measures--leaks, overdues, etc. continued to grow during this time. There were budget cuts that affected process safety--don't see it in first week but years later.

I'd raise these issues with my boss. Some of metrics were sent out hard copy. Data was available from our PSM web page. Sometimes we published and sent data to managers. The focus of management was elsewhere. Caretaker of MOC process. We describe the process, we set up how it is done, we manager central recordkeeping. Train MOC leaders. Our role was mostly a mentor role for actual MOCs. Sign off was built into the electronic data base. They all have to have sign offs. Data base lets me know if someone has not done what was needed. There are some issues PSM group has to sign off on--like environmental or safety.

Q: So we follow on MOC process. Actions are completed and some superintendent must sign off.

A: There are probably items out of the MOC that my group must sign off. We might not really do a detailed review of the MOC. We do not go out and audit if MOCs were completed except on the audit every three years. Has to be an MOC on a change of a relief valve.

Q: We have standard—PSSG; use stacks until we have a major modification.

A: My interpretation would be that the things would have to directly affect that blow down stack--some major modification that affected the operation of the stack. Not that any time you change the ISOM you have to replace all blow down stacks. A relief valve study was initiated at the ISOM, but it was not done due to budget reasons. ISOM was delayed in effect.

The trailer MOC was not closed out at the ultra cracker ULC. There is a form, some are mandatory requirements, that have to be done, there is a date that it has to be done. Data base flags MOC as overdue--says a requirement has not been satisfied. This flag goes to superintendent of the unit. Could be a lot of reasons why MOCL not done. But here, things were not done but trailers were made.

- This MOC should have been done by Ray Hawkins, flagged to him as overdue.
- Noting physical could stop someone from bringing a trailer on site.
- We are now doing a PSM audit right now.
- We added trailers as part of MOC process only in 1998 as it was not part of the original regulation.

Was this an aberration? No, 20% of time things were started up without completing MOCs.

Leadership team did not care. We published metrics on overdue MOCs. Some with action items from hazard operations and other PSM processes.

We implemented data base in 1995. Once we first did that, we found we were 50% over due. Persons got 90%+ compliance started eliminating the overdues. At the peak, we had this as a VPP measure. This was changed, no longer mandatory--we fell back to 70% compliance.

Request for report on metrics over last few years compliance KPIs.

We published our overall results through Process Safety Committee. I tried to have one-on-one discussions with managers. Never give a talk to Gower or Hoffman. Had a conversation with Don at time his department went away when he was BUL. I talked about what I put in the slide puck call it integrity management or PSM. I said this should be a direct report to him. _____, engineering assurance should also report to him. Operations Supervisor, craftsmen are keenly aware of who is the leader. I think Don had that position and these functions should report to him. Inspection now reports into maintenance subject to those budgets. I thought we should give independence to this group. I made some request to Norine, Andy Fiedler, Mike Elgin. I strongly recommended we not be put in HSSE because overshadowed by personal safety issues. When Manzoni comes in, they do not talk about process safety. Today, we are still in HSSE reporting to Pat King, we are not emphasized as a practice skill. For example, we would lead all hazard reviews and MOCs. I think Pat is not engaged in this arena.

I think facility siting is now better understood. API standard based on permanent buildings. Temporary buildings just don't trip the risk scale. So now industry has awoken to this.

Check list – person who lead the MOC misunderstood the ISO ft. list – have to do a separate check list and that was not. Didn't do the facility siting check list – but because it's temporary it does not

No man's land – I think this one went to Hawkins because ISOM/AU2/ARU was responsible. There is also a plot plan--all areas are accounted for.

PSM is a little broader than integrity management. The group standard has a lot of what PSM covers, but not everything.

I was on Grangemouth Task Force. Lesson was, pay attention to PSM. We examined this site with many traditional PSM concepts. Elevate profile on PSM and spend the money. There was a clear under current of cost saving at Grangemouth. Most other companies have a similar PSM structure to us. Embedded in HSSE, not enough money. Our former model was viewed as a best practice. Need constant vigilance on PSM. We also see the need to compromise convenience--at a TAR, do we have to fabricate everything right there on site.

There was an atmosphere of non-compliance. We would have still had those trailers there. Real questions, why do we not do our procedures? We need to sustain our efforts. There is still a cultural or systemic issue.