DEKRA

Mastering the A2L Transition:

How DEKRA Partnered with Bard to Achieve Safety and Compliance Excellence

DEKRA's expertise and tailored solutions enabled Bard to meet OSHA PSM requirements and drive operational success

Summary

When HVAC manufacturer Bard faced new OSHA regulations due to the A2L refrigerant transition, they turned to DEKRA for their Process Safety Management (PSM) expertise. DEKRA assessed how their existing systems compared to the new requirements, developed tailored safety protocols, and provided hands-on support. This partnership helped Bard stay on track with deadlines, uphold safety standards, and build a process-driven culture within their organization.

Challenge

For more than 110 years, Bard has manufactured high-quality commercial heating and cooling equipment for businesses across the globe. With modern production facilities in Ohio, Georgia and Mexico, this fourth-generation family-owned business stands as a legacy of innovation in the Heating, Ventilation, and Air Conditioning (HVAC) industry.

In 2021, Bard learned that their business would be impacted by the **A2L Refrigerant Transition**, a shift to a new generation of refrigerants with low global warming potential (GWP) to reduce the environmental impact of the HVAC industry.

The legislation required Bard to implement a new type of refrigerant in their products, which was more environmentally friendly but also more flammable. Due to their increased flammability, these refrigerants fall under the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) regulation.

The HVAC manufacturer was now transitioning from an assembly-focused facility to one regulated as a chemical manufacturing site. Bard had never had to follow OSHA PSM protocols before. The Bard Executive Team realized that they were outside their comfort zone and couldn't tackle the implementation of this new PSM system on their own.

Despite their extensive expertise in HVAC, they recognized the need for subject matter specialists to help navigate the complexities of this new workplace compliance, and with the deadline to transition looming in January 2025, they needed help fast.

Solution

To support their transition to the new A2L refrigerant, the team at Bard reached out to DEKRA, recognized leaders in PSM consulting

As part of their initial engagement, DEKRA conducted a PSM Assessment for Proposed Process Changes, a high-level on-site review of how the PSM regulation would affect Bard's processes, operations and management systems. The team reviewed existing systems to identify what could be leveraged and whether they aligned with OSHA PSM requirements. This evaluation helped determine whether basic adjustments were needed or if a complete overhaul was necessary in order to meet the new regulatory requirements.

Bard was so impressed with the quality of DEKRA's initial assessment that they chose to bring the team on board as their dedicated PSM consultant.

"DEKRA demonstrated a clear understanding of the challenges we faced as a privately held, family business. As a mid-sized company, we don't have the same resources as larger manufacturers. However, DEKRA remained patient, focused and committed to getting the job done."

- Matt Monroe, Executive Vice President/Vice President, Customer Experience, Bard

Following their initial assessment of Bard's facility, DEKRA created a PSM proposal outlining recommendations to support Bard in their A2L transition. The goal was to create a system that would enable Bard to safely manage the flammable chemicals in the new refrigerants while ensuring compliance with PSM regulations.

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DEKRA's responsibility was to design the PSM program, processes, and procedures with input from Bard, leaving Bard's team to implement and operationalize them internally.

"If we follow the process and procedures DEKRA is helping us implement, we've taken as much risk out of this as we possibly could."

> - Matt Monroe, Executive Vice President/Vice President, Customer Experience, Bard

DEKRA takes a pragmatic, collaborative approach to consulting, focusing on designing systems tailored to each client's unique culture, resources, and objectives. The system DEKRA designs for a family-owned business like Bard will be vastly different from one created for a larger corporation. Instead of merely identifying issues or prescribing generic fixes like some consultants, DEKRA works closely with clients to develop practical and effective systems that align with their operations.

As part of their PSM consultation, DEKRA also supported the work of the engineering firm responsible for Bard's facility upgrades, including the installation of new tanks and pumps. While the physical upgrades fell outside DEKRA's scope, they supported the project by conducting several Process Hazard Analyses (PHA), helping to identify risks and develop action plans and safeguards to complement the engineering work.

DEKRA partnered with Bard to establish a Management of Change (MOC) process. Since Bard already had an ISO quality system in place, DEKRA recommended building on that foundation to define an effective approval process and workflow.

Bard took full ownership of the PSM process internally. Companies often assume all they need is documentation to be compliant, but documentation alone doesn't make you safe. Bard realized this and established a governance team to oversee the project and allocated internal resources for DEKRA to partner with on various aspects of the new system. It was a collaborative approach combining DEKRA's expertise with Bard's hands-on leadership.

However, Bard faced a significant roadblock. They had multiple strategic priorities competing for the same resources. Even with an internal governance team to manage resources, the workload proved too much for many team members to handle alongside their full-time roles. The organization simply didn't have the bandwidth internally to manage multiple strategic projects at the same time.

Nine months into the engagement, it became clear to DEKRA that Bard was struggling to make progress with the A2L Transition. The PSM consultants had an honest conversation with the Bard executive team, explaining that if they stayed on the current path, they would miss the deadline. Bard was understanding and agreed to work with DEKRA to find a better way forward. DEKRA suggested taking on some of the tasks Bard was struggling with to help speed up the process. At first, Bard wasn't sure what work DEKRA could manage for them, but DEKRA quickly pinpointed areas where their support could free up time and accelerate the implementation.

For example, while Bard wrote the new operating procedures, DEKRA could produce training programs based on those procedures. DEKRA also provided interlock matrices, maintenance procedures, operating training programs and training materials while Bard conducted the training, all of which were out of the original scope of the agreement but were well within DEKRA's subject matter expertise.

Working closely with Bard's Executive Vice President, Matt Monroe, DEKRA explained what the organization needed to do to complete the implementation and how best to communicate with the executive team to secure the necessary resources. With the EVP being new to the role, DEKRA took the time to answer all his questions and help him navigate the learning curve.

"DEKRA had a vested interest in Bard's success. I've worked with other consultants who have said that and not lived it. There was no question in my mind that the DEKRA team lives it. They're in it for the success of their customers. They're not going away. They're not giving up. I have never seen that level of interest in a consultant."

- Matt Monroe, Executive Vice President/Vice President, Customer Experience, Bard

Because Bard was on a tight timeline, they needed to find a way to complete the implementation work quickly. In this situation, it was faster and more efficient to outsource this work to DEKRA (versus doing it in-house) to save time and meet the deadline.

DEKRA seamlessly integrated with the Bard team, stepping in to provide the resources and support Bard lacked. As a result, they collaborated more closely, and the scope expanded from PSM coaching to include additional project support. Recognizing Bard's struggles, DEKRA was committed to ensuring the team's success.

Results

Thanks to their partnership with DEKRA, Bard met the transition deadline and is now safely producing equipment using the new A2L refrigerant, with a PSM system guiding their operations.

While DEKRA's PSM consulting project will wrap up in the next few months, the real learning will happen when the team puts training into practice. To continue supporting the Bard team, DEKRA will offer postimplementation coaching to answer questions, address concerns, and provide ongoing support as the team works through applying what they've learned.

In six months, DEKRA will bring in a new team to conduct another assessment at the Bard facilities, ensuring everything is running smoothly.

In early 2025, Matt Monroe, Executive Vice President at Bard and Jean Cronin, Senior Process Safety Engineer at DEKRA, will co-host a presentation together at DEKRA's annual Safety in Action® Conference about their experience working together on the A2L Transition project.

The impact DEKRA's PSM consultancy has had on Bard's business goes beyond simply delivering training and documentation. DEKRA helped the organization implement a cultural change where safety processes have become an integral part of how the team operates and performs their jobs every day.

For example, during the Process Hazard Analysis (PHA), several of DEKRA's recommendations focused on product quality rather than safety. To support these recommendations, DEKRA helped Bard design a Management of Change (MOC) process to allow non-PSM changes to be managed through the same system. This approach helped Bard build stronger risk management practices and a more disciplined process for tackling bigger changes within the organization.

"The things we learned from DEKRA in terms of the importance of process have helped improve our products. It's helped our quality department institute new processes internally. DEKRA has helped us understand first-hand the benefits of having a rock-solid process in place."

> - Matt Monroe, Executive Vice President/Vice President, Customer Experience, Bard

One of the key benefits Bard experienced working with DEKRA was the consistency of service they received over their three-year partnership. DEKRA trained the Bard team, guiding them through challenging situations and fostering critical thinking skills.

Through this ongoing collaboration, DEKRA helped build the organization's confidence in managing change within the organization. This approach went beyond traditional training and focused on long-term development built on mentorship, collaboration, and long-term success.

To find out more, get in touch with a DEKRA team member today.



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