Understanding OSHA's Process Safety Management Standard

OSHA's Process Safety Management (PSM) of Highly Hazardous Chemicals Standard (29 CFR 1910.119) contains requirements for the management of hazards associated with processes using chemicals deemed to be "highly hazardous."

For many types of businesses, such as refineries and chemical companies, it may be obvious that PSM applies. However, PSM can apply to many other, perhaps not-so-obvious, employers, such as grocery stores, pulp mills, and manufacturers to name a few. Conversely, some employers think they have PSM-covered processes when in fact they do not!

Scope

PSM applies to companies that deal with any of more than 130 toxic and reactive chemicals in quantities listed in the standard's Appendix A. It also applies to processes that include:

- Any Category 1 flammable gas, or
- Any flammable liquid with a flashpoint below 100°F (37.8°C) on site, in one location, in a quantity of 10,000 pounds or more (with some exceptions)



Exempted from the standard

A few types of facilities and operations are exempt from PSM. The standard does not apply to some retail facilities, oil or gas well drilling or servicing operations, or normally "unoccupied" remote facilities (e.g., pump stations).

What is a process?

Under the Process Safety Management Standard, "process" refers to any activity involving a highly hazardous chemical. This includes any use, storage, manufacturing, handling or onsite movement of such chemicals.









Summary of requirements

Employers with processes that fall under this standard must:

- Involve impacted employees in the process safety management program.
- Compile information about the process.
- Conduct adequate process hazard analyses (PHA). The type of method used needs to be analyzed thoroughly for compatibility with the process. After the initial PHA, employers must revalidate the analysis at least every five years.
- Implement safe operating procedures.
- Conduct process safety training.
- Ensure process safety for contractors.
- Conduct pre-startup safety reviews.

- Ensure integrity of process equipment.
- Ensure management of change process and procedures are adequate.
- Investigate incidents per OSHA requirements.
- Ensure emergency planning and response efforts are adequate.
- Establish a process safety compliance audit process. Employers need to select a trained individual or assemble a trained team of people to audit the process safety management system and program at least once every three years.

With the proper procedures, processes and training, you can protect your employees from the harm of highly hazardous chemicals while ensuring compliance with OSHA requirements.



J. J. Keller[®] Consulting Can Help

Our expert consultants will work with you to develop and implement the 14 elements that comprise the Process Safety Management of Highly Hazardous Chemicals standard (29 CFR 1910.119).

They'll also assist you with your ongoing compliance requirements, including triennial audits, training for new and existing employees, updates to process hazard analysis, and submission of information and updates every five years.

It's the most reliable service for protecting your employees — and your company!

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