

TOOL TYPE **CHECKLIST**

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GEOGRAPHY **US**

SOURCE:

ORIGINAL

CHECKLIST OF PROPOSED CHANGES TO OSHA CHEMICAL SAFETY RULES

THE PROBLEM: On December 9, 2013, [OSHA proposed changes](#) to some of its most important chemical safety rules.

HOW TOOL HELPS SOLVE THE PROBLEM: Here's a Checklist of the 16 changes contained in the OSHA proposal.

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CHECKLIST OF PROPOSED CHANGES TO OSHA CHEMICAL SAFETY RULES

Rule Affected	Proposed Change
PSM: Which flammable liquid storage tanks are covered	Current Rule: PSM doesn't cover flammable liquid on site in one location, in a quantity of less than 10,000 pounds (4535.9 kg) Proposal: PSM would cover all stored flammable liquids in any quantity if they're connected to or near a process covered by PSM
PSM: Whether oil & gas well drilling operations are covered	Current Rule: PSM doesn't cover oil & gas well drilling operations and services (because they're subject to separate regulations) Proposal: OSHA thinking about eliminating the exemption for oil and gas well drilling and servicing operations
PSM: Whether oil & gas well production facilities are covered	Current Rule: PSM doesn't cover oil & gas well production facilities Proposal: OSHA thinking about eliminating the exemption for oil and gas well production facilities
PSM: Whether retail facilities are covered	Current Rule: PSM doesn't cover retail facilities Proposal: OSHA thinking about eliminating the exemption for retail facilities
PSM: How much of a reactive chemical triggers PSM requirements	Current Rule: PSM covers "any process involving a chemical" at or above amount listed for that chemical in Appendix A of standard Proposal: OSHA thinking about updating Appendix A and lowering threshold amounts at which reactive chemicals would be covered
PSM: Which reactive chemicals PSM covers	Current Rule: Appendix A lists 137 highly hazardous chemicals that PSM covers Proposal: OSHA thinking about updating Appendix A and adding new chemicals to the list
NA	OSHA thinking about "modernizing" PSM by requiring employers to adopt new management system elements, including procedures that would allow offshore personnel to stop work in response to imminent dangers
PSM: Stricter RAGAGEP monitoring requirements	Current Rule: Employers must document that equipment meets recognized & generally accepted good engineering practices (RAGAGEP) Proposal: New rule would require employers to actively evaluate and consider updates to existing RAGAGEP (or new ones)
PSM: Add definition of RAGAGEP	Current Rule: No definition of RAGAGEP Proposal: OSHA thinking about adding a specific definition of RAGAGEP

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PSM: Expand type of equipment that must meet mechanical integrity requirements	<p>Current Rule: Employers must ensure that certain equipment used in PSM processes meets mechanical integrity standards</p> <p>Proposal: OSHA thinking about expanding scope of requirement to include any equipment that's critical to safety</p>
PSM: Expressly require employers to manage changes	<p>Current Rule: Employers must implement written procedures to manage changes to equipment, procedures, technology, etc.</p> <p>Proposal: Spell out that employers must actually follow their change management procedures</p>
PSM: New emergency response plan requirement	<p>Current Rule: Employers must establish emergency action plans for facility and small releases</p> <p>Proposal: Employers would have to coordinate emergency planning with local emergency response authorities</p>
PSM: Audits must be done by third parties	<p>Current Rule: Employers must audit compliance with their facility PSM plan every 3 years but rule doesn't say who can do the audit</p> <p>Proposal: Audits would have to be conducted by outside third party</p>
Explosives & blasting agents: What standard covers	<p>Current Rule: Applies to keeping, manufacture, having, storage, sale, and transportation of explosives, blasting agents and pyrotechnics but not fireworks</p> <p>Proposal: Would also apply to dismantling and disposal of explosives, blasting agents and pyrotechnics and add fireworks to coverage</p>
Flammable liquids/Spray finishing standards: Consensus standards to meet	<p>Current Rule: Standards based on NFPA standards first developed in 1960s</p> <p>Proposal: Standards would be based on more modern consensus standards to be determined later</p>
Flammable liquids/Spray finishing standards: New ammonium nitrate rules	Would update requirements for storing, handling and managing ammonium nitrate