The Dell Group, Inc.

Creative Solutions for your compliance burdens

Process Safety Management

Any company or organization that makes, stores, uses or transports <u>large quantities</u> of highly hazardous chemicals should be concerned about the possibility of an accidental spill, release, fire, or explosion big enough to potentially harm or kill people at or near the site. OSHA has identified 137 highly hazardous substances and has developed a Process Safety Standard that sets forth detailed rules for process operations intended to reduce the risk of such a tragedy.

This standard also identifies a threshold quantity (TQ) for each substance - the amount, measured in pounds, used or kept by the company or organization, above which the Process Safety Standard applies.

If your company is covered by this standard, OSHA expects employees to be directly involved in developing the safety program. They need to understand how they might become involved in complying with the rules. Your program must also manage risks associated with contractors working on site.

PSM Program Elements

Written Employee Participation Plan

Provide a written plan detailing employee participation requirements in the Process Safety Management Program in accordance with OSHA 1910.119 (c). A list of employees who will be participating directly as members of the Process Safety Management Team and Process Hazard Analysis will be provided by the client.

Process Safety Information

Creative Solutions personnel will work with the facility Process Safety Team to define and compile the required information including, but not necessarily limited to:

Chemical Safety Information;

Information Pertaining to the Process; and

Information Pertaining to the Equipment.

The information gathered during this phase of the project will be delivered as the Process Safety Information Report. This report will form the basis of the Process Hazard Analysis. As a new facility, it is assumed that this information is available.

Process Hazard Analysis

- A. Conduct an initial Process Hazard Analysis (PHA) using an approved methodology. Conduct it with a team knowledgeable in the process. At least one operating employee must be directly involved in the analysis.
- B. Conduct six (6) Process Hazard Analysis meetings at the your facility, each meeting will be approximately 2 hours in duration.
- C. Document the Process Hazard Analysis findings and recommendations. Act on the PHA recommendations, document actions taken, and communicate actions to all affected employees.

Written Operating Procedures

Using the information compiled during Tasks 2 & 3, Creative Solutions will work with your personnel to develop written operating procedures for safely conducting activities associated with, for example, the ammonia refrigeration process. All aspects of process operation required by OSHA 1910.119 (f) will be detailed.

Prices for this task do not include potential revisions necessary to existing Lock-out/Tag-out program, if necessary.

Written Process Safety Management Plan

Creative Solutions then provides your Process Safety Management Plan with all the customized policies and procedures for **each of** OSHA Process Safety Management requirements. The information compiled includes:

Preventative Maintenance Procedures (Mechanical Integrity);

Management of Change Policies;

Chemical Emergency Response Plan;

Contractor Program;

Pre start-up Safety Review;

Hot Work Permits and other non-routine work permits;

Incident Investigation; and

Trade Secrets (if applicable).

Employee Training

Provide process related training for each employee assigned duties associated with, for example, the operation of the ammonia refrigeration process. Topics will include:

Process-specific safety and health hazards;

Hazard control strategies;

Emergency operations, including shutdown procedures;

Lock-out/tag-out procedures;

Safe work practices.

Program Audit

This task includes developing checklist for PSM compliance audit, as well as conducting an initial program audit and reporting results to the process safety team.

ADDITIONAL COMPLIANCE OPTIONS

HAZWOPER Awareness Training

First Responder Awareness Level: Trained to recognize a spill and to notify the proper authorities. No action may be taken to contain or stop the spill.

Operations Level (8-Hour) Emergency Response Training

First Responder Operations Level: Trained to recognize a spill, notify the proper authorities and to respond to the spill in a defensive manner. May spread sorbents or shutoff a valve but may not take any action that may result in personal contact with the hazardous substance.

Incident Command (4-Hour) Training

Conduct Incident Command Training as required by OSHA HAZWOPER for Emergency Coordinator and Incident Commanders on each shift.

Written Respiratory Protection Program

To meet the requirements of newly revised standard, found at OSHA 29 CFR 1910.134, to cover respiratory protection equipment use by Response Team.

HazMat Technician/Specialist Level Emergency Response Training

The specialist assumes a larger leadership role in an emergency response, receiving training in the implementation of both state and local emergency response plans.

PLEASE CONTACT US REGARDING A PLAN TO FIT YOUR NEEDS:

800-259-8930 or <u>info@dellgroup.com</u>