

# PROCESS SAFETY MANAGEMENT FAQs



## What is PSM?

Process Safety Management is an analytical tool composed of organizational and operational procedures, design guidance, audit programs, and a host of other methods intended to prevent or minimize the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals.

- *Reference OSHA CFR 1910.119 and EPA 40 CFR 68 for complete details*

## What companies are subject to PSM?

PSM applies to companies that deal with toxic and reactive Highly Hazardous Chemicals (HHCs) at or above the specified threshold quantity (TQ) as defined by OSHA standards. It also includes

flammable liquids and gases defined by OSHA 1910.1200(c) in quantities of 10,000 pounds (4,535.9 Kg) or more. Common focus industries include manufacturing, specifically those pertaining to petroleum products, chemicals, transportation equipment, and fabricated metal products. Other sectors include natural gas liquids, farm product warehousing, wholesale trade, pyrotechnics/explosives, as well as electric, gas, and sanitary services.

- *Refer to OSHA 1910.119 App A List of Highly Hazardous Chemicals, Toxics and Reactives (Mandatory)*
- *Reference OSHA CFR 1910.119 and EPA 40 CFR 68 for complete details*



## What companies are not subject to PSM?

PSM does not apply to:

- Retail facilities
- Oil or gas well drilling or remote servicing operations that are normally unoccupied
- Facilities where HHCs maintained fall below OSHA Threshold Quantity (TQ)
- *Reference CFR 1910.119 and 40 CFR 68 for complete details*

## I don't have a PSM program yet. Can you help?

EN Consulting can help determine if you are subject to regulations and are required to implement a formal PSM program. Our PSM experts can develop an overall PSM program or individual element definition and program write-ups.

## I've completed a PSM program. What now?

PSM is often viewed as an initiative to be completed within a set period of time; however, this attitude is not congruent with the intentions and requirements of PSM. PSM is an ongoing initiative that must be maintained as long as the covered processes are operating. Proper maintenance of PSM programs can consume significant company resources; so many companies utilize EN Consulting's highly experienced team to provide efficient coordination and maintenance of their PSM programs. Our experts can perform a Process Safety Gap Assessment and scrutinize every aspect of your program and facilities, following up with a detailed report that outlines gaps and provides corrective measures to ensure you comply with OSHA regulatory standards.

## Who mandates PSM compliance?

On July 17, 1990, OSHA published in the Federal Register (55 FR 29150) a proposed standard, Process Safety Management of Highly Hazardous Chemicals. The standard provides requirements for the management of hazards associated with processes using highly-hazardous chemicals to help assure safe and healthy workplaces. Some states have adopted standards and enforcement policies that may differ from those mandated by OSHA.

- *Reference CFR 1910.119 and 40 CFR 68 for complete details*

## What are the benefits of implementing PSM?

PSM programs help protect people, assets, and the environment. PSM may also ensure process continuity (uptime), improve productivity, mitigate financial loss, and avoid negative publicity from incidents.

## Why consider PSM if it's not mandated?

While PSM may not be a regulatory requirement for your facility, you are required by OSHA and the EPA to operate your facility consistent with industry-recognized good practices. PSM is a sound practice that helps protect companies, employees, assets, and the environment. In the event that levels of HHCs reach threshold quantity as defined by OSHA, your process will become subject to PSM regulations.