

TO: Distribution

FROM: T. G. Grumbles

DATE: July 24, 1990

**Interoffice
Communication**

SUBJ: OSHA PROPOSED REGULATION: PROCESS SAFETY MANAGEMENT OF
HIGHLY HAZARDOUS CHEMICALS

On July 17, OSHA proposed the subject regulation. This regulation covers the following areas of plant and process operations:

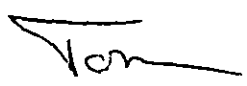
Process Safety	Mechanical Integrity
Process Hazard Analysis	Hot Work Permits
Operating Procedures	Management of Change
Training	Incident Investigations
Contractors	Emergency Planning and Response
Pre-Start Up Safety Review	Compliance Safety Audits

This is an extensive regulation requiring exhaustive documentation of process and operating information, training of employees and contractors, conduct of HAZOP type reviews, and program development in multiple areas and self auditing.

Comments on the proposed regulation are due to OSHA by October 15. Vista will comment on this regulation as it has significant impact on our plants and safety programs. I am providing this copy now so that you can determine who should review and comment at your facility. For plants that have members on the current Process Safety Project Team, these individuals would be logical coordinators for comments.

I, or Veldon Messik will be contacting you in the near future to further discuss Vista's review and comments this standard. At this time please note the following:

1. The contents of this standard are consistent with the Responsible CARE Process Safety Code that will be finalized in September.
2. Both Clean Air Act bills have sections on accidental release provisions that contain similar elements. It is not clear at this time how those will "coordinate" with OSHA's rule.
3. In the attached, the actual regulation starts on Page 31. Appendix C was not available from the computer information service, but will be provided as soon as we get the actual Federal Register copy. In the regulation text I've marked the individual sections in the margin to help identify them.


T. G. Grumbles

dlj

Attachment
.119