

TO: Process Safety Coordinators

FROM: Eric J. Meyer

DATE: February 20, 1992

VISTA

Office
Communication

SUBJECT: OSHA Process Safety Regulation is Signed!!

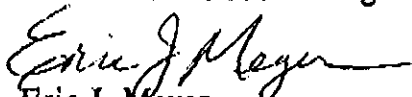
The OSHA Process Safety Regulation was rushed through the Office of Management and Budget and signed into law on Friday, February 14, 1992. It is expected to appear in the Federal Register on Friday, February 21 or Monday, February 24. It will take effect 90 days after it is published.

Details of exactly what is in the final rule won't be known until it is published in the Federal Register. However, OSHA's Region 6 Administrator, Gil Saulter, spoke on the new rule during the Process Safety Symposium in Houston on February 18. He revealed the following significant (and, in some cases, surprising) items:

- (1) Process Hazard Analysis will be phased in over the next 5 years. By May 1994, 25% of the PHA's must be complete. By May 1995, 50% must be complete. By May, 1996 15% and by May 1997, all PHA's must be done.
- (2) The surprise is that it appears everything else must be complete when the rule becomes law 90 days after it is published in the Federal Register, i.e., May 1992. This would include developing operating procedures, training operators, updating drawings, implementing management of change, etc.
- (3) There appears to have been very few changes to the content of the regulation, although Mr. Saulter did not go into detail.

I believe this decision on timing was politically driven in that OSHA did not want to give the appearance that it was okay to operate without up-to-date documents, procedures, etc. for 5 years or 3 years or even 1 year. Practically speaking, however, OSHA recognizes that no one will be in full compliance by May 1992.

I am mailing a copy of the OSHA administrator's speech to you for your information and reference. As soon as I get a copy of the published regulation, I will see that you get it also.


Eric J. Meyer

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cc: THH, Plant Managers, Safety Directors, TGG, JDS