

OSHA Instruction CPL 2-2.45A

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Directorate of Compliance Programs

Joseph H. Hegwood

1910.119 (d): PROCESS SAFETY INFORMATION

I. PROGRAM SUMMARY

The intent of this paragraph is to provide complete and accurate information concerning the process which is essential for an effective process safety management program and for conducting process hazard analyses. Therefore in accordance with the schedule set forth in paragraph (e)(1) the employer is required to compile written process safety information on process chemicals, process technology, and process equipment before conducting any process hazard analysis.

II. QUALITY CRITERIA REFERENCES

- | | | |
|----|-----------------|----------------------------|
| A. | 1910.119(d): | Process Safety Information |
| B. | 1910.119(e)(1): | Process Hazard Analysis |
| B. | 1910.1200: | Hazard Communication |

III. VERIFICATION OF PROGRAM ELEMENTS

A. Records Review

1. Has written process safety information been compiled before conducting any process hazard analysis (PHA)?

FIELD NOTE REFERENCE(S):

Criteria
Reference

Met
Y/N

.119(d)

N

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5. Has the employer documented that equipment complies with recognized, generally accepted good engineering practices? (Review the documentation for evidence that compliance with the appropriate consensus standards has been researched.) FIELD NOTE REFERENCE(S):	.119(d) (3)(ii)	Y
6. Has the employer determined and documented that existing equipment designed and constructed in accordance with codes, standards, or practices no longer in general use are designed, maintained, inspected, tested, and operating in a safe manner? (Documentation may be through methods such as: documenting successful prior operation procedures; documenting that the equipment is consistent with the appropriate editions of codes and standards; or performing an engineering analysis to determine that the equipment is appropriate for its intended use.) FIELD NOTE REFERENCE(S):	.119(d) (3) (iii)	Y
B. On-site Conditions		
1. Do observations of a representative sample of process chemicals and equipment indicate that the process information is complete? (Information that does not correspond to the actual conditions demonstrates incomplete information. Check critical equipment and components to see if they have been properly identified.) FIELD NOTE REFERENCE(S):	.119(d)	N
2. Do observations of a representative sample of process components indicate that the process complies with recognized and generally accepted good engineering practice? (Review a representative number of safety devices such as pressure relief devices for proper sizing according to the maximum anticipated pressure.) FIELD NOTE REFERENCE(S):	.119(d) (3)(ii)	Y

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1910.119 (h) CONTRACTORS**I. PROGRAM SUMMARY**

The intent of this paragraph is to require employers who use contractors to perform work in and around processes that involve highly hazardous chemicals to establish a screening process so that they hire and use contractors who accomplish the desired job tasks without compromising the safety and health of employees at a facility. The contractor must assure that contract employees are trained on performing the job safely, of the hazards related to the job, and applicable provisions of the emergency action plan.

II. QUALITY CRITERIA REFERENCES

- A. 1910.119(h)
- B. 1910.119(f)(4)
- C. 1910.119(n)

III. VERIFICATION OF PROGRAM ELEMENTSCriteria
ReferenceMet
Y/N**A. Records Review - Employer's Program**.119(h)
(1)

1. Does the program include all contractors performing maintenance or repair, turnaround, major renovation or specialty work on or adjacent to covered processes?

(Contractors performing incidental services which do not influence process safety such as janitorial work, food and drink services, laundry, delivery, and other supply services need not be included.)

FIELD NOTE REFERENCE(S):

Y

2. Is the information regarding the contractor's safety performance and programs obtained and evaluated for selection of contractors?

.119(h)
(2)(i)

FIELD NOTE REFERENCE(S):

Y

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3. Are the contract employers informed of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the processes? FIELD NOTE REFERENCE(S):	.119(h) (2)(ii)	Y
4. Are contract employers informed of the applicable provisions of the emergency action plan required by .119(n)? FIELD NOTE REFERENCE(S):	.119(h) (2) (iii)	Y
5. Have safe work practices to control the entrance, presence and exit of contract employers and contract employees in covered process areas been developed and implemented? FIELD NOTE REFERENCE(S):	.119(h) (2)(iv) .119(f) (4)	Y
6. Are contract employers evaluated for their performance in fulfilling their obligations to: • Assure their employees are trained in safe work practices needed to perform the job? • Assure their employees are instructed in the known potential fire, explosion, or toxic release hazards related to the job and the applicable provisions of the emergency action plan? • Document the required training and the means to verify their employees have understood the training? • Assure their employees follow the facility safety rules and work practices? • Advise the employer of unique hazards presented by the contractor's work? FIELD NOTE REFERENCE(S):	.119(h) (2)(v)	Y
7. Does the employer maintain a contract employee injury and illness log related to the contractor's work in process areas? FIELD NOTE REFERENCE(S):	.119(h) (2)(vi)	Y N
Records Review - Contractor's Programs		
8. Are all contractor employees trained in the work practices necessary to perform their jobs safely? FIELD NOTE REFERENCE(S):	.119(h) (3)(i)	Y

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9. Is each contract employee instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the processes and applicable provisions of the emergency action plan? FIELD NOTE REFERENCE(S):	.119(h) (3)(ii)	Y
10. Is there documentation that each contract employee has received and understands the required training? FIELD NOTE REFERENCE(S):	.119(h) (3) (iii)	Y
11. Do the contract employee training records contain the following: • The identity of the employee? • The date of the training? • The means used to verify that the training was understood? FIELD NOTE REFERENCE(S):	.119(h) (3) (iii)	?
12. Are there means to assure that contract employee follow the safety rules of the facility, including safe work practices required in .119(f)(4)? (Review evidence of enforcement by the contractor.) FIELD NOTE REFERENCE(S):	.119(h) (3)(iv) .119(f) (4)	Y
13. Is the employer advised of any unique hazards presented by the contract employer's work or any hazards found by the contract employer's work? FIELD NOTE REFERENCE(S):	.119(h) (3)(v)	Y
B. On-site Conditions 1. Based on a representative sample of observations of contractor employees, has the employer's program to control their entrance, presence, and exit been implemented? FIELD NOTE REFERENCE(S):		.119(h) (2)(iv) Y

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2. Based on a representative sample of observations of contractor employees, do they follow the safety rules of the facility? (These rules include the employer's safe work practices such as lockout/tagout, confined space entry, and opening process equipment or piping; they may also include other rules such as excavation procedures or use of PPE.) FIELD NOTE REFERENCE(S):	.119(h) (3)(iv)	Y
C. Interviews 1. Based on interviews with contractor employers, have they been informed of the known fire, explosion, or toxic release hazards related to their work and the processes in which they are involved? FIELD NOTE REFERENCE(S):	.119(h) (2)(ii)	Y
2. Based on interviews with contractor employers, have they been informed of the applicable provisions of the employer's emergency action plan? FIELD NOTE REFERENCE(S):	.119(h) (2) (iii)	Y
3. Based on interviews with contractor employers and employees, have work practices to control their entrance, presence, and exit of covered process areas been implemented? FIELD NOTE REFERENCE(S):	.119(h) (2)(iv)	Y
4. Based on interviews with the contractor employer, has the employer evaluated the contractor's performance in fulfilling the obligations required in .119(h)(3)? FIELD NOTE REFERENCE(S):	.119(h) (2)(v)	Y
5. Based on interviews with a representative number of contractor employees, are they being instructed in the known potential fire, explosion, or toxic release hazards related to their work and the processes in which they are involved? FIELD NOTE REFERENCE(S):	.119(h) (3)(ii)	Y

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6. Based on interviews with a representative number of contractor employees, have they been instructed in the applicable provisions of the emergency action plan? (Ask them to explain the plan and evacuation procedures.) FIELD NOTE REFERENCE(S):	.119(h) (3)(ii)	Y
7. Based on interviews with a representative number of contractor employees, has the contract employer assured that they follow the safety rules of the facility? (Ask how safe work practices, entry restrictions for the facility, and use of required PPE are enforced.) FIELD NOTE REFERENCE(S):	.119(h) (3)(iv)	Y

For additional information on Contractors, see Appendix D, reference 16.

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*Jimmy Aubrey***1910.119 (i): PRE-STARTUP SAFETY REVIEW****I. PROGRAM SUMMARY**

The intent of this paragraph is to make sure that, for new facilities and for modified facilities when the modification necessitates a change to process safety information, certain important considerations are addressed before any highly hazardous chemicals are introduced into the process. Minimum requirements include that the pre-startup safety review confirm the following: construction and equipment is in accordance with design specifications; safety, operating, maintenance, and emergency procedures are in place and adequate; for new facilities, a PHA has been performed and recommendations resolved or implemented; modified facilities meet the requirements of paragraph (1), management of change; and training of each employee involved in the process has been completed.

II. QUALITY CRITERIA REFERENCES

- A. 1910.119(i): Pre-startup Safety Review
 B. 1910.119(1): Management of Change

III. VERIFICATION OF PROGRAM ELEMENTSCriteria
ReferenceMet
Y/N**A. Records Review**

1. Has a pre-startup safety review been performed for all new facilities and for modified facilities when the modification is significant enough to require a change in process safety information?

.119(i)
(1)

Y

FIELD NOTE REFERENCE(S):

2. Do pre-startup safety reviews confirm that prior to the introduction of highly hazardous chemicals to a process:

.119(i)
(2)

- Construction and equipment is in accordance with design specifications? Y

FIELD NOTE REFERENCE(S):

- Safety, operating, maintenance, and emergency procedures are in place and adequate? N

FIELD NOTE REFERENCE(S):

N

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3. Based on interviews with a representative sample of operators, maintenance employees, and engineers, is a PHA performed and are recommendations resolved prior to a startup that introduces highly hazardous chemicals into a new process? FIELD NOTE REFERENCE(S):	.119(i) 2(iii)	Y
4. Based on interviews with a representative sample of operators, maintenance employees, and engineers, do modified facilities meet requirements of paragraph (1), Management of Change prior to introducing a highly hazardous chemical? FIELD NOTE REFERENCE(S):	.119(i) 2(iii)	Y
5. Based on interviews with a representative sample of operators, is training completed for each employee involved in operating the process prior to the introduction of a highly hazardous chemical? FIELD NOTE REFERENCE(S):	.119(i) 2(iv)	N

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2. (Continued) Do pre-startup safety reviews confirm that prior to the introduction of highly hazardous chemicals to a process: • For new facilities, a PHA has been performed and recommendations resolved or implemented before startup? Y FIELD NOTE REFERENCE(S): • Modified facilities meet requirements of paragraph (1)? Y FIELD NOTE REFERENCE(S): • Training of each employee involved in operating the process has been completed? N FIELD NOTE REFERENCE(S):	.119(i) (2)	N
On-site Conditions 1. Do observations of new or modified facilities indicate that prior to the introduction of highly hazardous chemicals: • Construction and equipment is in accordance with design specifications? Y • Safety, operating, maintenance, and emergency procedures are in place and adequate? N FIELD NOTE REFERENCE(S):	.119(i) (2)	N
C. Interviews [See NOTE, p. A-2.] 1. Based on interviews with a representative sample of operators, maintenance employees, and engineers, can it be confirmed that the construction and equipment are in accordance with design specifications prior to introducing highly hazardous chemicals to a process? FIELD NOTE REFERENCE(S):	.119(i) 2(i)	Y
2. Based on interviews with a representative sample of operators, maintenance employees, and engineers, are safety, operating, maintenance, and emergency procedures in place prior to introduction of highly hazardous chemicals into a process? Are these procedures adequate? FIELD NOTE REFERENCE(S):	.119(i) 2(ii)	Y