

***Examples of Documentation to Support
Compliance with OSHA's PSM Regulation***

Description of PSM Documentation	Required	Practical Necessity	Convenience
General PSM Documentation			
1. A written implementation plan, budget document, or memo outlining PSM compliance intentions			X
2. A manual describing the PSM program for the facility		X	
3. A listing of general PSM training given to plant employees or seminar attendance to help prepare them to implement the rule			X
4. A plant organization chart that describes the PSM-related roles and responsibilities		X	
Employee Participation			
1. Written plan describing implementation of this provision	X		
2. Minutes of meetings during which employees and their representatives were consulted about the development of the PSM program		X	
3. Various PSM documents listed below that name employees as authors, participants, reviewers, etc.			X
Process Safety Information			
1. MSDSs	X		
2. Laboratory reports concerning tests of the thermal stability or reactivity associated with covered chemicals			X
3. Up-to-date information that describes the subject process, its operating limits, maximum intended inventories, safety systems, and consequences of deviations (e.g., troubleshooting information)	X		

Description of PSM Documentation	Required	Practical Necessity	Convenience
Process Safety Information (continued)			
4. Updated P&IDs, interlock descriptions, electrical classification drawings	X		
5. Design files for equipment including references to codes and standards used, technical basis for relief device design, etc.	X		
6. Written documentation that asserts the plant's judgment that the associated equipment complies with generally recognized engineering practices, or documentation of tests, inspections, operating history, etc., that shows that the equipment is safe for its intended duty	X		
Process Hazard Analysis			
1. Prioritization of covered processes for the purposes of scheduling PHAs that list the factors considered in selecting the order	X		
2. Descriptions of how the plant intends to plan, perform, document, use, and retain PHAs		X	
3. Descriptions of how the plant uses particular PHA techniques			X
4. PHA reports	X		
5. Memos or reports stating plant management's response to suggestions from PHA reports	X		
6. Schedules for tracking progress and completing accepted PHA recommendations	X		
7. Lists of "qualified" PHA team leaders. Lists of PHA-related training courses taken			X
8. Minutes of meetings or logbooks that provide evidence of communicating the results of PHA reports to affected employees		X	
Operating Procedures			
1. Written instructions for operating the covered process in all anticipated modes of operation	X		
2. Annual certifications that the procedures are current and accurate	X		

Description of PSM Documentation	Required	Practical Necessity	Convenience
Operating Procedures (continued)			
3. Written description of the process the plant uses to create and update operating procedures, including the names of people and their responsibilities			X
Training			
1. Description of the initial training program. Lists of topics covered in training courses or other methods used to provide initial training		X	
2. Checklists of operating tasks to be demonstrated by employees that undergo on-the-job training			X
3. Memos specifically "grandfathering" employees for certain operating jobs	X	There are electronically filed in TRIM	
4. Descriptions of refresher training plans, methods, and contents		X	
5. Evidence of how employees were consulted about the appropriate frequency for their refresher training (e.g., training surveys)		X	
6. Records of training for every person involved in operating the process, including the means used to determine that the individual understood the training	X	No, these records are not maintained in HR/TRAINING, they are presently maintained in	
Contractors			
1. Copies of information that employer's have used during the contractor selection process to evaluate contractors' safety programs and performance		Dined for that covered process. We do maintain records for Utility Techs.	
2. Criteria or forms used to document how such a contractor safety review was used in the selection process		X	
3. Generic contractor safety manual provided to all contractors bidding on or performing work in a covered process area		X	
4. Lists of safe work practices that contractors are required to follow while performing work in the covered facility	X		
5. Examples of written information provided to contractors concerning the specific hazards associated with the covered process		X	

Description of PSM Documentation	Required	Practical Necessity	Convenience
Contractors (continued)			
6. Booklets, badges, or cards that are used to help control the entrance and exit of contractors into covered process areas			X
7. Lists of emergency action plan information provided to each contractor employee so they will know what to do in the event of an emergency			X
8. Forms, criteria, or other means used to document the periodic auditing of contractor work practices to ensure that contractors are satisfying the regulatory requirements (e.g., training)		X	
9. Log of contractor injuries/illnesses for covered process areas	X		
10. Memos, data, or other records to indicate that appropriate action was taken when contractor safety infractions were discovered		X	
Pre-startup Safety Review (PSSR)			
1. Procedures, forms, or checklists used to perform PSSRs		X	
2. Examples of completed PSSR forms with plant management's authorization to start up, ensuring that the provisions of this paragraph are satisfied		X	
Mechanical Integrity			
1. Written procedures for mechanical integrity activities	X		
2. Description of the maintenance training program. Lists of topics covered in training courses, apprenticeship program, or other methods used to provide training		X	
3. Checklists of maintenance tasks to be demonstrated by employees that undergo on-the-job training			X
4. Memos specifically "grandfathering" maintenance employees			X
5. Descriptions of refresher training plans, methods, and contents			X
Mechanical Integrity (continued)			

Description of PSM Documentation	Required	Practical Necessity	Convenience
6. Records of training for maintenance personnel, including the means used to determine whether the individuals understood the training		X	
7. Inspection and testing records for equipment in the covered process	X		
8. Quality assurance procedures and/or records for new equipment and for maintenance materials, spare parts, and equipment		X	
9. Manufacturers' installation and repair manuals			X
Hot Work Permit			
1. Hot work permit procedures		X	
2. Example hot work permit forms	X		
3. Completed hot work permits			X
Management of Change			
1. Procedures for managing change	X		
2. Completed "request for change" forms		X	
3. Minutes of change review meetings or memos containing change review analyses			X
4. Minutes of meetings or other evidence of communicating the results of changes to affected employees		X	
Incident Investigation			
1. Procedures for performing incident investigations			X
2. Completed incident investigation reports or data summaries	X		
3. Procedures for resolving recommendations and tracking their implementation	X		
4. Minutes of meetings or other evidence of communicating the results of incident reports to affected employees		X	

Description of PSM Documentation	Required	Practical Necessity	Convenience
Emergency Planning and Response			
1. Emergency action plans	X		
2. Records of emergency action plan training for plant employees		X	
Compliance Audits			
1. Procedures, forms, and checklists for performing compliance audits		X	
2. Compliance audit reports	X		
Trade Secrets			
1. Policy for dealing with trade secrets		X	
2. Completed confidentiality agreements			X