Top 10 Process Safety Management Tidbits

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At the end of November 2011, OSHA announced [2]that it was extended nationwide what had been a limited pilot enforcement program targeting chemical facilities' compliance with OSHA's Process Safety Management standard in only a few regions of the country. This new Chemical Facilities PSM *National* Emphasis Program [3] (Chem NEP) establishes policies and procedures for inspecting workplaces covered by OSHA's PSM standard.

The purpose of the Chem NEP is to allow OSHA to conduct many more, but focused inspections at chemical facilities selected from a list of worksites likely to operate covered processes.

Below is a list of the 10 most important things that chemical plant operators need to know about the new nationwide Chem NEP:

1. The pilot Chem NEP is now expanded nationwide, including mandatory participation by approved state plan states.
2. The Chem NEP is effective immediately and has no set expiration.
3. The directive details who will be targeted for Chem NEP inspections.
4. The directive explains how OSHA will select which operating unit(s) will be inspected.
5. Every area office will conduct at least five Chem NEP inspections each year.
6. The Chem NEP emphasizes implementation of the PSM elements over well-documented PSM programs.
7. Inspections will follow a dynamic set of listed questions.

8. The directive identifies a list of documents OSHA will request and information they will expect you to present.
9. A single condition will yield multiple citation items.
10. Abatement verification and documentation is now mandatory.

For a more detailed review of these issues, see this article *[4] published by* Eric Conn, the Head of the OSHA Practice Group at Epstein Becker & Green *[1], EHS Today.*

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