



Process Safety Management

OSHA VPP

February 2025

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This presentation outlines process safety management (PSM) requirements for the purposes of Occupational Safety and Health Administration (OSHA) Voluntary Protection Programs (VPP) implementation.

The presentation provides information on the background and importance of PSM, required documentation, and the various levels of employee knowledge. It concludes with an action checklist and supplemental details to help with OSHA VPP implementation and sustainment efforts.

Objectives

- During this presentation, you will learn to:
 - Summarize the background and importance of PSM
 - List PSM-related documentation
 - Describe the knowledge leadership/management, key personnel, and the workforce should have regarding PSM
 - Identify PSM actions to implement and sustain OSHA VPP

This presentation is beneficial to safety professionals, VPP representatives, maintenance personnel, and others with PSM responsibilities, to include supervisors in PSM areas.

Background & Importance

- Included in the HPC element of VPP
- Addresses the use of HHCs in processes
- Necessary to comply with 29 CFR 1910.119
- Provides workplace and community safety
- Prevents or minimizes the unexpected release of HHCs



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Image retrieved from Microsoft Images



HHC = highly hazardous chemical
HPC = Hazard Prevention and Control

PSM: Steps taken to prevent the release of any substance defined as a “HHC” by OSHA.

HHC: A substance possessing toxic, reactive, flammable, or explosive properties and specified by paragraph (a)(1) of 29 CFR 1910.119.

Process: An activity involving an HHC, including: use, storage, manufacturing, handling, or the on-site movement of such chemicals, or combination of these activities.

View 29 CFR 1910.119, PSM of highly hazardous chemicals at:

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9760

The image shows on-site storage of fertilizer with high amount of anhydrous ammonia, an HHC. Image retrieved from Microsoft Images.

Documentation

- Process safety information
- Process hazard analyses
- PSM procedures
- Employee participation plans
- Emergency action plans
- Pre-startup safety reviews
- Equipment inspections and test results
- Quality assurance evaluations



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Image retrieved from Microsoft Images



PSI = process safety information

PHA = process hazard analysis

Make sure you provide completed examples of forms and documents to your assessment team. Don't just show them blank forms! They want to see the documents you filled out to thoroughly assess the processes within your safety and occupational health management system (SOHMS).

Examples of PSI include: chemical toxicity, permissible exposure limits (PELs), physical data, reactivity data, corrosive data, thermal and chemical stability data for mixing, and block flow diagrams.

PHA: Organized and systematic effort to identify and analyze the significance of potential hazards associated with the processing or handling of HHCs.

Written PSM procedures include: operating, maintenance, safety, and emergency procedures.

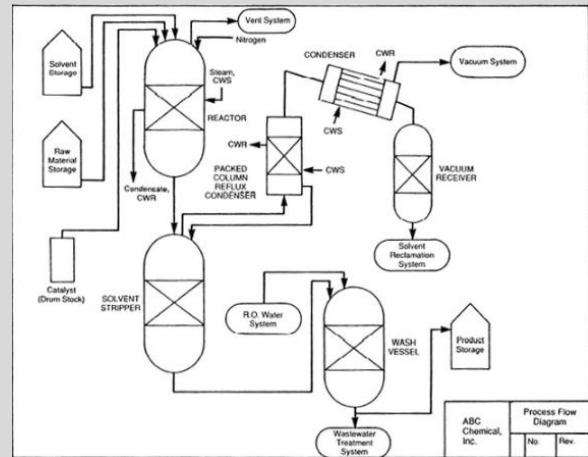
Employee participation plan: A written plan of action regarding the implementation of employee involvement required by the PSM standard.

Update emergency plans and procedures for all scenarios (e.g., tornado, fire, spills).

Image retrieved from Microsoft Images.

Documentation

- Diagrams showing process flow, block flow, and piping and instrumentation
- PSM compliance audits
- MOC procedures
- Incident investigations involving PSM and HHCs
- Corrective action forms



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Image retrieved from OSHA



MOC = management of change

Make sure you provide completed examples of forms and documents to your assessment team. Don't just show them blank forms! They want to see the documents you filled out to thoroughly assess the processes within your SOHMS.

OSHA considers process diagrams as PSI; however, it is a good idea to have these on-hand when assessors, engineers, and process operators have detailed questions related to your PSM program and procedures.

MOC procedures provide guidance when a change(s) in the process (i.e., install new equipment or change the flow of the process due to maintenance) occurs.

The image shows an example of a process flow diagram; block flow and piping and instrumentation are common types of process diagrams. Image retrieved from OSHA at:

<https://www.osha.gov/Publications/osha3133.html>

Documentation

- PSM maintenance schedule
- Contract employee injury and illness log
- Hot work permits
- Initial and refresher PSM training
- OSHA VPP application supplements



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Image retrieved from Microsoft Images



Make sure you provide completed examples of forms and documents to your assessment team. Don't just show them blank forms! They want to see the documents you filled out to thoroughly assess the processes within your SOHMS.

Welding, torch, and spark-producing operations require hot work permits.

View the PSM Application, Supplement A at: <https://www.osha.gov/vpp/supplement-a-questions>

For more details on PSM Supplements B and C of the OSHA application, visit:
<https://www.osha.gov/vpp/vpp-policy>

The image shows a hot work permit, which is sometimes necessary for PSM processes. Image retrieved from Microsoft Images.

Leadership/Management Knowledge

- Leaders and managers should know about
 - HHC(s) used at the worksite and associated hazards
 - Written PSM procedures
 - Emergency response procedures
 - Employee and leadership responsibilities in the event of a HHC release
 - Anticipated or new process changes
 - Training requirements



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Image retrieved from Microsoft Images



Leaders and managers should be aware of HHC used on-site and the hazards associated with a release. They should also be knowledgeable on PSM-related procedures and their responsibilities in the event of a HHC release.

Image retrieved from Microsoft Images.

Key Personnel Knowledge

- Key personnel should be knowledgeable about:
 - HHC(s) used on-site and associated hazards
 - PSM inspection, testing, and audit results
 - MOC procedures
 - Maintenance schedules
 - PSM-related documents
 - PSM training requirements
 - Review and revision process
 - OSHA VPP application requirements



Examples of key personnel include: PSM engineers, system operators, maintenance personnel, S&H staff, and industrial hygienists.

The image shows key personnel providing PSM-related training to affected worksite employees. Image retrieved from Microsoft Images.

Workforce Knowledge

- Employees should know about:
 - HHC(s) used on site and associated hazards
 - Signs and symptoms of HHC exposures
 - Access control points & entrance procedures
 - Location of PSM documentation
 - Written PSM procedures
 - Response procedures for released HHCs
 - Employee participation in PSM
 - PSM training received



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Image retrieved from Microsoft Images



Employees should understand the hazard associated with HHCs and the signs and symptoms of exposure to the HHCs used in PSM processes.

Employees should understand any procedures, including emergency response, related to PSM processes and operations. Ensure employees know the location of any PSM-related documents.

PSM requires documenting and implementing an employee participation plan. Ensure employees participate in PSM processes and can reference their participation plan(s).

The image shows an employee using OSHA-compliant waste management system in a laboratory setting. Image retrieved from Microsoft Images.

Action Checklist

- ☐ Assess the chemicals used at the worksite
- ☐ Create an employee participation plan
- ☐ Conduct PHAs
- ☐ Develop written PSM procedures
- ☐ Train employees
- ☐ Employ contractor oversight
- ☐ Hold pre-startup safety reviews
- ☐ Investigate PSM-related incidents
- ☐ Review, audit, and update PSM procedures
- ☐ Complete OSHA VPP supplements



Follow this action checklist to implement and sustain VPP expectations for PSM. Each of these action checklist items will be covered in more detail.

Image retrieved from Microsoft Clip Art.

Worksite Assessment

- Involve managers, supervisors, and employees
- Conduct a walkthrough to look at worksite processes
- List processes that involve large quantities of chemicals, which include the use, storage, manufacture, handling, and/or moving of these chemicals
- Review chemical-related documentation



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Image retrieved from Microsoft Images



Conduct a site walkthrough, observe the chemicals used in worksite processes, and create a list of all the worksite processes that use chemicals. Request input from managers, supervisors, and employees, and ask about alternative chemical names, as well. Remember that chemicals can be stored in chemical cabinets, in underground or aboveground tanks, vats, and barrels.

Chemical-related documentation includes safety data sheets (SDSs) – SDSs identify the chemicals, composition, and safety information for each product. Review your SDSs during your site walkthrough and determine if hazardous chemicals are present.

The image shows an assessment team reviewing process documentation. Image retrieved from Microsoft Images.

Worksite Assessment

- Determine if any chemicals/ingredients are included on OSHA's PSM HHC list
- If so, determine the quantity of your HHC(s)
- Compare your HHC quantity against OSHA's listed TQs

**Comply with
OSHA's PSM
standard if your
quantities meet or
exceed a listed TQ**

CHEMICAL NAME	CAS*	TQ**
Acetaldehyde	75-07-0	2500
Acrolein (2-Popenal)	107-02-8	150
Acrylyl Chloride	814-68-6	250

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Image retrieved from OSHA



CAS = Chemical Abstract Service

TQ = threshold quantity

The SDS lists CAS numbers for each ingredient, helping you compare the chemicals you use at your worksite against those listed on the OSHA PSM HHC list. Compare your chemical list against the OSHA PSM HHC list. OSHA's PSM HHC list includes a chemical names, related CAS numbers, and TQs. If you have a chemical/ingredient listed in OSHA's PSM HHC list, look at all your processes and determine the volume you store on-site and use within your processes. If your total quantity meets or exceeds the TQ identified in OSHA's list, then your organization falls under the PSM standard and must implement a PSM program.

Document the findings of the worksite assessment. Documenting these results proves you evaluated your site. Use 29 CFR 1910.119 and the list of HHCs to determine if chemicals used at your site require PSM.

View the HHCs and their threshold quantities at:

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9761

Additionally, you may need to comply with the Environmental Protection Agency's Risk Management Program. View 40 CFR Part 68 at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr68_main_02.tpl

Best Practice: Consider drafting a report or memorandum for record stating you have evaluated the site to determine it does not fall under OSHA PSM requirements if you do not have HHCs or do not cross the PSM threshold quantity. Include the date of the evaluation in the report. Update this report occasionally to show you continually assess your worksite.

The image shows a screenshot of 29 CFR 1910.119 Appendix A - List of Highly Hazardous Chemicals, Toxics and Reactives (Mandatory). Image retrieved from OSHA.

Employee Participation Plan

- Develop a written employee participation plan:
 - Collect and compile PSI
 - Complete and review PHAs
 - Develop PSM procedures
 - Conduct pre-startup safety reviews
 - Execute MOC procedures
 - Assist with incident investigations



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Image retrieved from Microsoft Clip Art



OSHA's PSM standard requires a written employee participation plan. They explain how you provide opportunities for employees to be involved in your PSM program.

The slide shows several ways in which you can involve employees in your PSM program.

This is not an all-inclusive list of involvement activities. Measure the effectiveness of involvement each year to determine if employees are participating according to your plan.

For guidance on information to include in your employee participation plan, visit:

<http://www.gcapcoolcast.com/wp-content/uploads/2012/10/Example-Guidelines.pdf>

Image retrieved from Microsoft Clip Art.

Process Hazard Analysis

- Create a diverse PHA team
- Select the hazard analysis methodology to use
- Prioritize processes for PHA by their level of risk
- Gather PSI



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Image retrieved from Microsoft Images



A PHA looks at potential causes and consequences related to the release of HHCs. You need to analyze the equipment, instrumentation, human actions, and other factors which may affect the process. You also need to determine failure points, methods of operations, and other possible factors leading to incidents.

A PHA team is essential in conducting a PHA. Your PHA team should consist of an engineer, process operator(s), and other managers, supervisors, and employees knowledgeable of the process, OSHA PSM requirements, and hazard analysis method used to complete the PHA.

Examples of hazard analysis methodologies include: what-if analysis, hazard and operability study, failure mode and effect analysis, and fault-tree analysis.

When determining which PHAs to complete first, consider: extent of the process hazards, number of potentially affected personnel, age of the process, and process operating history. Always perform PHAs on processes with a higher risk, first.

For additional PSI information and guidance, view OSHA publication 3132 at:
<https://www.osha.gov/Publications/osh3132.pdf>

The image shows possible members of a PHA team. Image retrieved from Microsoft Images.

Process Hazard Analysis

- Review initial worksite assessment results
- Identify and evaluate process hazards
- Document the outcome
- Communicate hazards to affected personnel
- Correct identified hazards



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Image retrieved from Microsoft Images

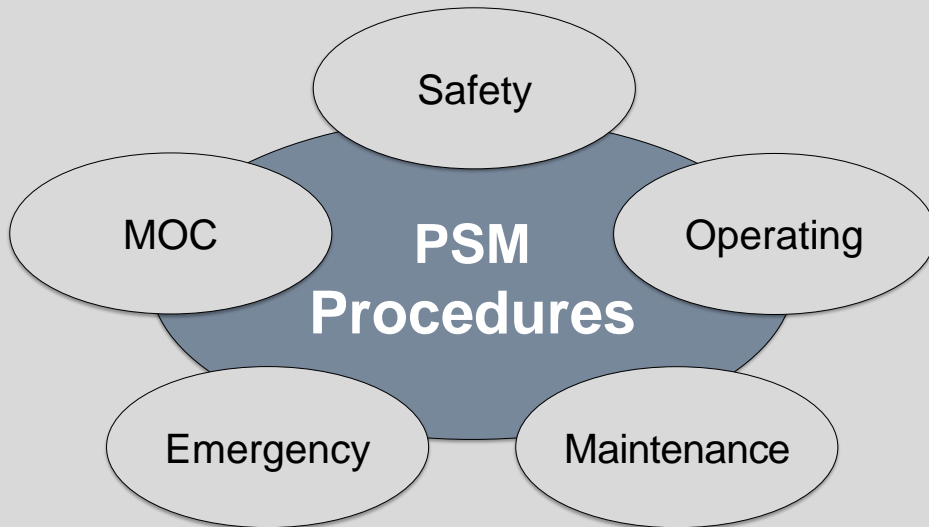


When performing a PHA, document: process hazards, previous process-related incidents and near-misses, hazard controls currently in-place, risk of hazard control failure and consequences, facility siting, and potential human factors. Conduct a PHA on all processes covered by the OSHA PSM standard.

Once the PHA is complete, communicate any identified hazards to affected personnel and initiate your corrective action process to abate any hazards. Document any corrective action steps taken, even if they were rejected or failed, to show the effort you put forth to mitigate the hazard.

The image shows a group of employees conducting a PHA. Image retrieved from Microsoft Images.

Written PSM Procedures



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Write your PSM procedures based on the completed PHA. OSHA's PSM standard requires five types of procedures: operating, safety, emergency, maintenance, and MOC.

You can incorporate the written procedures into one document for simplicity. Know that safety considerations may be built into other procedures.

ALWAYS include managers, supervisors, and employees when developing or reviewing procedures for your PSM processes.

Keep copies of all procedures in readily available locations for employee use and reference.

Safety Procedures

- Review identified hazards and risks
- Review and/or write S&H procedures
- Incorporate S&H controls and safe work practices into each procedure
- Exercise established safety procedures for accuracy, revise as needed



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Image retrieved from Microsoft Images



S&H = safety and health

Review hazards and risks by reviewing previous risk assessments and hazard evaluations. Look at completed S&H documents (e.g., SDSs for HHCs, self-inspection checklists, trends, hazard analyses, technical guides) to identify information to include in your written safety procedures. Do not forget to include hazard control use and required personal protective equipment (PPE).

Safe work practices must also be developed in accordance with other OSHA regulations, too. Safe work practices can include: confined space entry; control of hazardous energy (lockout/tagout); opening process equipment or piping; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel.

Once you finalize your written safety procedures, conduct a dry-run of the procedures to test their accuracy and ensure hazard controls work effectively.

The image shows an example of a safe work practice (lockout/tagout) performed on an electrical shutoff switch. Image retrieved from Microsoft Images.

Operating Procedures

- Review the process, HHCs, technology, equipment, operating manuals, and control measures
- Write operating procedures consistent with PSI
- Revise operating procedures when changes occur
- Certify the accuracy of procedures annually

Operating procedures

- ✓ **Steps for each operating phase**
- ✓ **Operating limits**
- ✓ **S&H considerations**
- ✓ **Safety systems and their functions**

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Steps for each operating phase include: initial startup; normal operations; temporary operations; emergency shutdown, including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators; emergency operations; normal shutdown; and, startup following a turnaround or after an emergency shutdown.

Operating limits include: the consequences of deviating from an operating limit, as well as the steps required to correct or avoid a deviation from an operating limit.

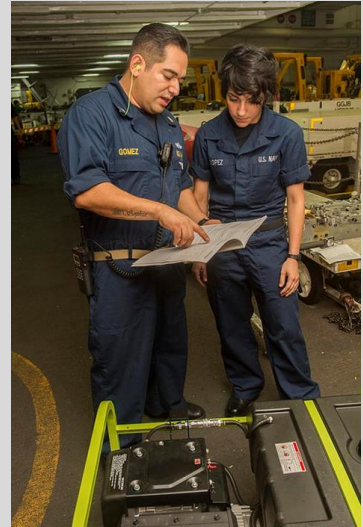
S&H considerations include: properties of, and hazards presented by process chemicals; precautions necessary to prevent exposure (including engineering controls, administrative controls, and PPE); control measures to be taken if physical contact or airborne exposure occurs; quality control for raw materials and control of hazardous chemical inventory levels; and, any special or unique hazards.

Seek suggestions regarding potential hazards, worst-case scenarios, process operations, and proper emergency responses from employees and others involved in the development process. Consider assigning monitors in each work area to oversee safety and PSM implementation. Ensure monitors have the proper training and are familiar with the process operations included in the PSM procedures. Include provisions for contractors in the written operating procedures.

Operating procedures must be immediately revised to reflect any change(s). Certify the accuracy and currency of all operating procedures, annually. Remember to document this certification!

Maintenance Procedures

- Involve maintenance personnel
- Review equipment maintenance documents and operating manuals
- Review and/or write maintenance procedures
- Exercise established maintenance procedures for accuracy, revise as needed



Refer to your written preventive/predictive maintenance program to review testing and inspection requirements. Refer to the original equipment manufacturer information or technical guides for more information on specific pieces of equipment. You can also look at engineering designs, plans, drawing, and manufacturer specifications to identify fail-safe points.

Develop procedures for pressure vessels and storage tanks, piping systems, relief systems, vent systems and devices, emergency shutdown systems, controls, and pumps – basically any system in a PSM process. Always include maintenance personnel in the development and review of procedures.

Verify all spare parts and materials used for maintenance activities are suitable and acceptable for their uses. Consider including a process for assuring the appropriate use and accountability of spare parts and maintenance materials.

The image shows employees reviewing maintenance procedures. Image retrieved from Microsoft Images.

Emergency Procedures

- Review your current emergency action plan
- Add a PSM emergency supplement to the plan
- Exercise PSM emergencies
- Critique the execution of emergency procedures

PSM emergency supplement

- ✓ Steps for each operating phase
- ✓ Steps for handling both catastrophic and small HHC releases
- ✓ Emergency response
- ✓ Alarm systems
- ✓ Training requirements

Your emergency action plan should include required components under 29 CFR 1910.38, Emergency Action Plans.

Revise your current plan to incorporate emergency situations involving PSM processes and HHCs. Include small, large, and/or catastrophic releases of HHC, as well.

OSHA outlines emergency action plan requirements. View OSHA 29 CFR 1910.38(a) for additional information:

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9726

Management of Change Procedures

- Build a sequence of MOC approval authority
- Establish a SME team
- Create a form for documenting changes

Section 1: <i>To be completed by Initiator/Facility PIC.</i>	
DESCRIPTION OF CHANGE (explain): _____	
REASON FOR CHANGE (explain): _____	
WORK STARTS DATE: (mm/dd/yy)	WORK ENDS DATE: (mm/dd/yy)
WORK STARTS TIME: _____ AM or PM	WORK ENDS TIME: _____ AM or PM
IMPACT CHANGE WILL HAVE ON HEALTH, OPERATING PROCEDURES, SAFETY, COASTAL AND MARINE ENVIRONMENTS (explain): _____	
Section 2: <i>To be completed by _____</i>	
Approved <input type="checkbox"/> Denied <input type="checkbox"/> Edit Operating Procedures <input type="checkbox"/> Signature _____ Date _____	
Permit Required <input type="checkbox"/> BOEMRE Notification Required <input type="checkbox"/> BOEMRE Submittal Required <input type="checkbox"/>	
Qualifications Verified <input type="checkbox"/> Training Verified <input type="checkbox"/> Other (explain) _____	
Comments: _____	

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Image retrieved from Petsec Energy



SME = subject matter expert

You do not need to execute your MOC procedures for replacements in-kind.

Replacement in-kind: An item (e.g., equipment, chemical, procedure) meeting the design specification of the item it is replacing. The replacement can be an identical replacement (e.g., same equipment make and model) or any other alternative item specifically provided for in the design specification. An alternative, though, cannot in any way adversely affect the use of the item, associated items, or hazards.

Your SME team should include: engineers, S&H staff, PSM SMEs, emergency response staff, process operators, and maintenance personnel. Utilize these personnel for developing and executing MOC procedures.

The image shows a snapshot of a MOC form to help document workplace changes related to PSM activities. Image retrieved from Petsec Energy at: <http://www.petsec.com.au/wp-content/uploads/2014/12/04.0-MOC.pdf>

Management of Change Procedures

- Write procedures to manage process changes
- Execute MOC procedure and address:
 - Technical basis for the change
 - S&H impacts of the change
 - Modifications to existing procedures
 - Timeframe for implementing the change
 - Responsible person(s) to approve process changes



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Image retrieved from Microsoft Images



Write procedures to manage chemicals for: process chemicals, technology, equipment, procedures, and facilities affected by PSM processes.

MOC procedures must address: the technical basis for the proposed change; impact of change on S&H; modifications to operating procedures; necessary time period for the change; and authorization requirements for the proposed change.

Once you develop a MOC procedure, ensure all personnel involved with the process are aware of the steps to initiate a change. Communicate changes and provide training to all employees, maintenance personnel, and contract employees operating a process prior to starting the process up again. Immediately revise PSM procedures when changes occur.

View an example of a MOC procedure at: <http://www.petsec.com.au/wp-content/uploads/2014/12/04.0-MOC.pdf>

Image retrieved from Microsoft Images.

PSM Training

- Deliver initial training
 - Include employees assigned to a PSM process
 - Include those affected by PSM operating procedures
 - Do not forget maintenance personnel and emergency responders
 - Cover the process overview, PSM procedures, S&H hazards, emergency operations, and safe work practices



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Image retrieved from Microsoft Images



Deliver initial training to all employees before working on a PSM process. In your initial training, include: an overview of the PSM process(es), written PSM procedures (i.e., safety, operating, MOC, emergency, maintenance), specific S&H hazards, emergency operations (including shutdown), and safe work practices.

If you discover a process already falls under PSM, develop your PSM program and procedures, and train employees as soon as possible.

Don't forget to train your maintenance personnel, emergency responders, and any other employee affected by the PSM process (including all involved in maintaining the on-going integrity of process equipment).

You may need to use a combination of classroom and hands-on training to help your employees understand their roles, responsibilities, and other components of the training.

The image shows employees receiving hands-on preparation during PSM training. Image retrieved from Microsoft Images.

PSM Training

- Deliver refresher training every 3 years
- Retrain all affected personnel:
 - After process changes
 - Prior to the startup of a process after a change
- Document the completion of all PSM training
- Evaluate the effectiveness of provided training



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Image retrieved from Microsoft Images



As a part of your MOC procedures, train all affected personnel as soon as a process change is made, and prior to the startup of the process after the change. Process changes may include: revisions to PSM plans and procedures, technology, equipment, or facilities, as mentioned in your MOC procedure.

Training records must include: employee name, date of training, the means used to verify the employee understood the training.

Evaluate the effectiveness of provided training through written tests, quizzes, fill in the blank question/answer sheets, and supervisor observations.

The image shows a group of maintenance personnel receiving training on a boiler. Image retrieved from Microsoft Images.

Contractor Oversight

- Establish a process to evaluate contractor S&H performance
- Ensure contractors have received proper training from their employer
- Evaluate on-site contractor performance
- Maintain a separate contractor injury and illness log

Inform contract employees of:

- | | |
|-------------------------|-----------------------|
| ✓ Potential hazards | ✓ Hazard controls |
| ✓ Emergency action plan | ✓ Safe work practices |

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PSM requirements only apply to contractor employees performing maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a PSM covered process. They do not apply to your general service contractors (e.g., janitorial work, food and drink services, laundry, delivery or other supply services).

Communicate your hazard reporting process to all contractors. Evaluate contractor performance by conducting periodic walkthroughs to look for hazards and compliance with your established procedures.

Maintain a contractor injury and illness log(s) in accordance with your contractor oversight programs – this log is separate from your on-site employee injury and illness log.

Contractors must also meet the responsibilities listed in 29 CFR 1910.119(h)(3). Contractors are responsible for providing their own training on safe work practices and PSM awareness to safely complete their jobs. This can be dependent upon the contractor language, though, further specifying if this training is provided by the contractor or by your organization.

To review contractor responsibilities, visit the PSM standard at:

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9760

Pre-Startup Safety Reviews

- Initiate a safety review and confirm:
 - Design specifications of construction and equipment
 - Accuracy and effectiveness of PSM procedures
 - Completeness of PHAs (for new facilities)
 - Execution of MOC requirements (for modified facilities)
 - Status of identified recommendations
 - Completed and documented employee training
- Review PSM procedures with employees



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Image retrieved from Microsoft Images



A pre-startup safety review communicate PSI to employees for new or modified facilities and processes where HHCs are used.

Initiate safety reviews for: a new HHC to be used in a process, new facilities, and when there are significant process modifications resulting in a change to PSI.

Prior to beginning the process again after a significant change, review the PSM process, the process changes, new or changed PSI, and all PSM procedures with employees.

Significant change: Modifications to the PSM equipment, processes, procedures, technology, or procedures that cause an adjustment in the existing PSI.

The image shows a manager reviewing PSM procedures with employees to ensure they are correct. Image retrieved from Microsoft Images.

PSM Incident Investigations

- Follow established incident investigation procedures
- Investigate incidents that did, or could have resulted in, catastrophic release of HHCs
- Initiate the investigation within 48 hours
- Document the details of the investigation
- Share investigation results
- Maintain investigation reports for at least 5 years



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Image retrieved from Microsoft Images



Follow Service- or Agency-specific guidelines to investigate PSM-related incidents. Consider drafting a supplement to list the circumstances or occurrences requiring formal PSM incident investigation. Follow the 48-hour initiation timeframe to comply with the PSM standard.

Establish an investigation team composed of at least one person knowledgeable of the PSM process. Include one contractor if it occurred in a contractor work area.

Document the following information, at a minimum: date of the incident, date investigation began, description of the incident, factors contributing to the incident, and recommendations resulting from the investigation.

The image shows an investigation team conducting an incident investigation for a released HHC. Image retrieved from Microsoft Images.

Reviews, Audits, and Updates

- Consider developing a PSM committee
- Conduct continual testing and inspections of process-related equipment
- Retrain the workforce when changes are made

Review/update all PHAs	Every 5 years
Audit the compliance of PSM processes	Every 3 years
Review written PSM procedures	Every 3 years

The OSHA PSM standard has periodic review requirements. Refer to your Service/Agency or local guidance regarding PSM, as those requirements may be more stringent than OSHA's. PSM is a safe work practice, or hazard control program, and the DoD requires all hazard controls programs and hazard analyses be reviewed annually, per DoDI 6055.01. Review all other guidance to determine the best review period at your organization. Consider developing a committee to handle PSM process and document reviews.

OSHA requires re-evaluating PHAs every five years, at a minimum. Make sure the hazard analysis is consistent with the current process and PSI. Review all plans and procedures every three years for accuracy and effectiveness. Also, conduct a compliance audit every three years. You must also retain your previous two compliance audits. During these audits, make sure you have effective processes and procedures in place and followed by employees.

Document all identified findings and associated resolutions in your hazard tracking system. Document all resolutions for the life of the process as OSHA may be interested in this information.

When you made all the changes, train all employees on these changes prior to process startup.

OSHA VPP PSM Supplements

Supplement A	Supplement B	Supplement C
PSM Application	PSM Annual Questionnaire	PSM On-Site Evaluation Questionnaire
<ul style="list-style-type: none"> • Print out this supplement • Answer the questions in narrative format • Write “Not Applicable” for questions outside the scope of your PSM operations – explain why! • Submit the completed supplement with your OSHA VPP application 	<ul style="list-style-type: none"> • Review the questions included in this supplement (these change year to year) • Answer the questions in narrative form, evaluating both best practices and areas of opportunity • Submit the completed supplement with your annual VPP self-evaluation (if you are a Star site) 	<ul style="list-style-type: none"> • Review the questions you answered for supplement A • Think about other questions an OSHA assessment team may ask about your PSM • Prepare to answer these questions, and others regarding PSM, during on-site OSHA VPP evaluations and recertifications

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OSHA VPP has supplements A, B, and C for organizations pursuing OSHA VPP and fall under the PSM standard.

Submit PSM Supplement A with your OSHA VPP application. It contains a series of questions about your PSM program. OSHA reviews your answers to better understand the PSM program, processes, and procedures at your organization.

Submit PSM Supplement B with your OSHA VPP annual self-evaluation. It contains a series of selected questions from OSHA's Dynamic Inspection Priority Lists. These questions change from year to year. Your OSHA VPP Region Manager will provide these questions for you to submit with your annual self-evaluation each year. If you are not a Star site, you can just keep a copy of your completed supplement with your annual self-evaluation – this helps your continuous improvement efforts.

Answer PSM Supplement C during your OSHA VPP on-site assessment. It contains a series of questions selected by the VPP on-site team members from OSHA's dormant PSM Inspection Priority Lists. They are selected prior to the on-site evaluation. Each application site covered by the PSM standard receives a different set of questions.

View the PSM Application, Supplement A at: <https://www.osha.gov/vpp/supplement-a-questions>

For more details on PSM Supplements B and C of the OSHA application, visit: <https://www.osha.gov/vpp/vpp-policy>

Conclusion

- In this presentation, you learned to:
 - Summarize the background and importance of PSM
 - List PSM-related documentation
 - Describe the knowledge leadership/management, key personnel, and the workforce should have regarding PSM
 - Identify PSM actions to implement and sustain OSHA VPP

This presentation summarizes the basic requirements to meet OSHA's 29 CFR 1910.119, PSM requirements. It not an all-encompassing summary of every regulatory requirement within 29 CFR 1910.119. Please refer to the regulation when establishing a PSM program to ensure all regulatory requirements are met.