

11th Ammonia Safety Conference
Kansas City, Kansas
June 13, 2019

Process Safety Management and Contractors

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OSHA's Balanced Approach



- **Enforcement**
- **Compliance Assistance**
- **Training**

OSHA Initiatives



Preventing Trenching Incidents

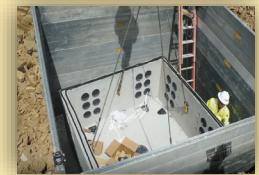
- DOL's Strategic Plan identifies trenching hazards as an agency priority.
- OSHA's goal is to increase the number of corrected trenching hazards through enforcement and consultation.
- Trench Safety Stand-Down:
June 17-22, 2019



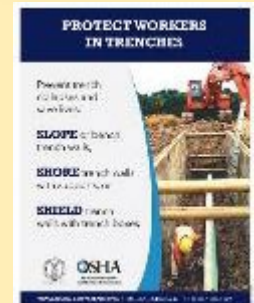
Excavations
in Construction

[English](#)
[Spanish](#)

5 Things You
Should Know
To [Stay Safe](#)
in a Trench



sticker



poster

Heat Illness Prevention Campaign

- Heat illness sickens thousands and results in the deaths of dozens of workers each year
- Campaign educates employers and workers on danger of working in heat, and three steps to prevention: WATER. REST. SHADE.
- Resources include OSHA-NIOSH heat safety app
- Informal launch is **May 24, 2019** (“No-Fry Day” – Friday before Memorial Day)



WATER. REST. SHADE.

**OSHA Heat Illness
Prevention Campaign**



[Spanish](#)

[English](#)

Safety and Health Programs

Every effective safety and health program includes **three key components:**

- Management leadership
- Worker participation
- A systematic approach to finding and fixing workplace hazards





SUICIDE PREVENTION

Get help now.

If you're having trouble coping with work-related stress, talk with someone who can help.

- Call 1-800-273-8255
- Para español 1-888-628-9454
- Online chat suicidepreventionlifeline.org/chat

www.osha.gov/preventing-suicides

Process Safety Management

General Contractor and
Contractors (subcontractors)



What is the Purpose of this standard?

- To control and prevent the consequences from a release of toxic, reactive, flammable or explosive chemicals.
- Highly Hazardous Chemicals (HHCs)- See Appendix A.
- Flammable liquids and gases in process above the Threshold Quantity (TQ) of 10,000 pounds.
- Manufacturing of explosives and pyrotechnics.



Covered Process

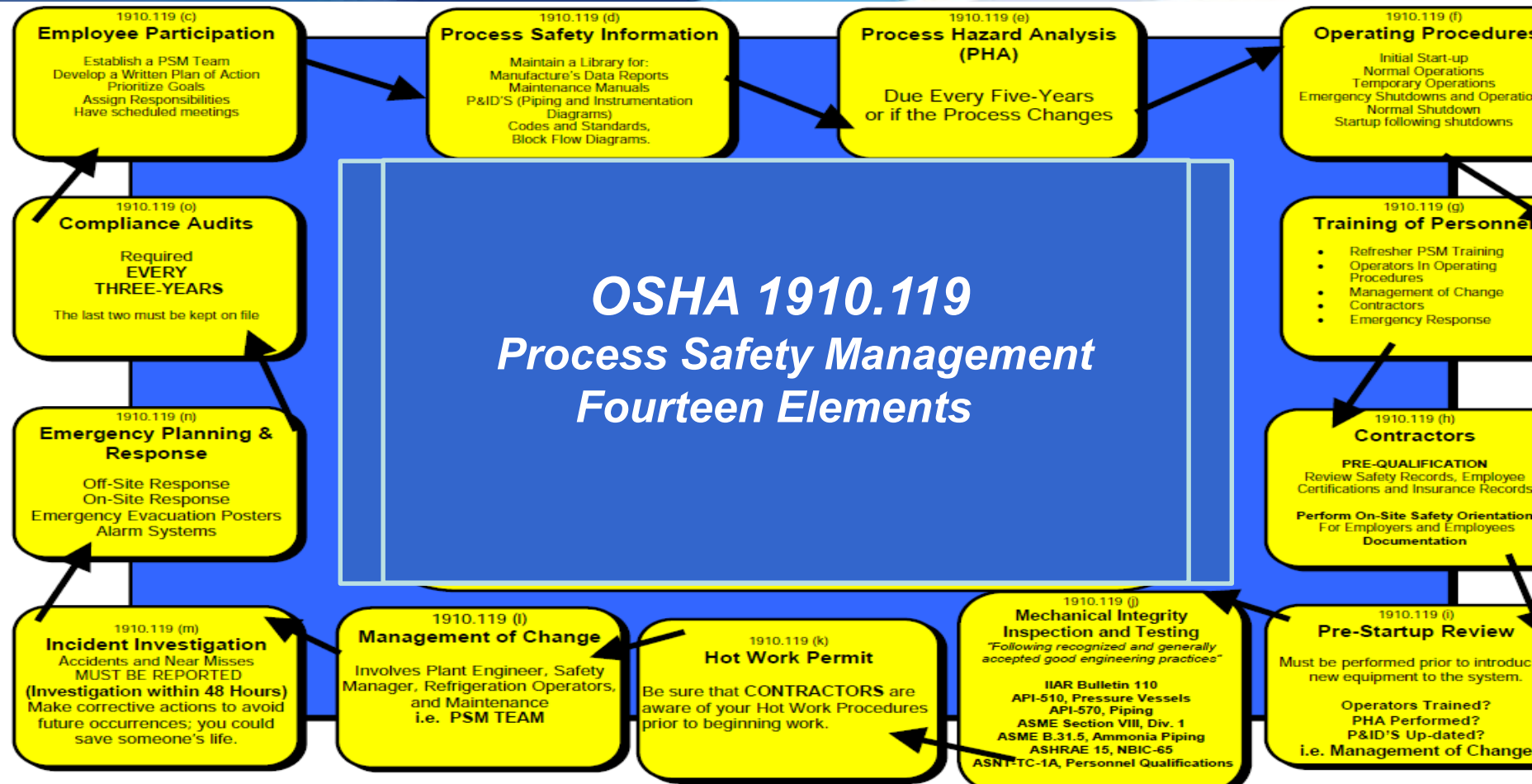
- Threshold Quantities (TQs) are always expressed in **pounds (lbs)**. See 29 CFR 1910.119, Appendix A.
- **Category 1**- Flammable gas or flammable liquids with a flash point <100 F (37.8 C) on site in one location in a quantity of 10,000 lbs.



Background of Process Safety Management

- **Is a performance base standard**
- **Uses the Recognized and Generally Accepted Good Engineering Practices (RAGAGEP)**
- **Any other OSHA standards**

Process Safety Management





Retail Exemption

29 CFR 1910.119(a)(2)(i)

New Memo – April 30, 2018

OSHA will not issue citations under PSM for NAICS codes:

- 424590 – Other Farm Product Raw Material Merchant Wholesalers
- 424510 – Grain & Field Bean Merchant Wholesalers
- 424910 – Farm Supplies Merchant Wholesalers



OSHA Multi-Employer Citation Policy

- OSHA's Field Inspection Reference Manual (FIRM)- This is the Agency's citation policy for multi-employer worksites.
- December 10, 1999 (CPL2-0.124)

29 CFR 1910.119 (h)(1)- Contractors

- Maintenance
- Repairs
- Turnaround
- Major renovations
- Specialty work on or adjacent to a covered process



Employer Responsibilities...(h)(2) (i-ii)

General Requirements

- Obtain & evaluate information regarding contract employer's safety and health performance and programs.
- Inform about fire, explosion or toxic release hazards related to the contractor's work and the process.



Continuation... Employer Responsibilities

Subpart (h)(2)(iii-vi)

- Emergency Action Plan
- Safe work practices
- Control entrance
- Presence and exit of contract employees and contract employees in covered process areas.
- Conduct **periodic** evaluations on the contractor's performance
- Maintain the OSHA 300 log- Injury and Illness records related to the work in progress.

Contract Employer Responsibilities (h)(3)(i-ii)

- Train in the best work practices to perform his/her job safely
- Instruct in the potential fire, explosion or toxic release hazards





OSHA Top 10

FY 2018 OSHA inspection data

**Most frequently cited
OSHA regulations
during inspections**

- 1. Fall Protection**
- 2. Hazard Communication**
- 3. Scaffolding**
- 4. Respiratory Protection**
- 5. Lockout/Tagout**
- 6. Ladders**
- 7. Powered Industrial Trucks**
- 8. Fall Protection – Training Requirements**
- 9. Machine Guarding**
- 10. Eye and Face Protection**

Contractor & Training Subpart (h)(3)(iii)

- **Identity** of the contract employee(s)
- **Date** of the training
- Means to verify that the contract employee **understood** the training.
- **DOCUMENT & DOCUMENT**



Contract Employer Responsibilities (h)(3)(iv-v)

- Follows the safety rules of the facility including the safe work practices
- Advise the employer of any unique hazards presented by the contract employer's work, or any hazards found by the contract employer's work.



Selection Process... Site Specific

- Develop and implement a reliable pre-qualification process.
- Request at least 5 years- 300 logs, copy of insurance records
- Experience Modification Rate (EMR)

Selection of Contractors

- Copy of their Safety & Health Programs
- Copy of their training records and qualifications, certifications, any other relevant documents.
- OSHA History- Nationwide

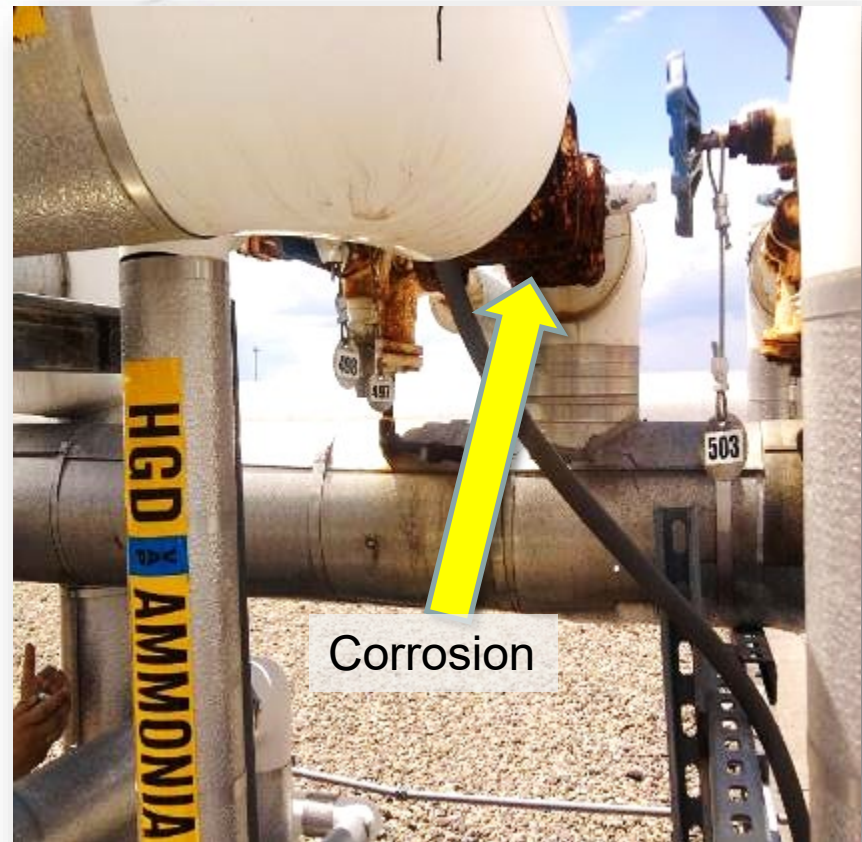
Critical Decisions & Contractors



- Right people = Right decisions
- The employer is always responsible for their covered process.

Mechanical Integrity & Contractors---getting the BEST

- Equipment, vessels, pipes, valves, engines – labeled and clearly identified the direction of the flow.
- Watch out for corrosion.
- Inspect outside and inside the covered process equipment.



Do we have any issues here?

- Inspect and evaluate any evidence of corrosion or deformations in pipes and vessels.
- Inspect under ice to determine, if is there any potential for ruptures, leaks and releases.



BENEFITS TO THE BOTTOM LINE

Safety and health programs help businesses:

- **Prevent** workplace injuries and illnesses
- **Improve** compliance with laws and regulations
- **Reduce** costs, including workers' compensation premiums
- **Engage** workers
- **Enhance** social responsibility goals
- **Increase** productivity and enhance overall business operations



Questions/Comments/Concerns?





www.osha.gov

800-321-OSHA (6742)