PSM Lite?

What process safety management programs are needed at non-PSM sites?

Michael Washington M.B.A, CHMM, CPEA, CPSA
Process Safety Specialist
BASF North American Process Safety Expert Services Group, North America

Presenter Email: Michael-lashane.washington@basf.com

Keywords and Abbreviations: Process Safety Management (PSM), National Emphasis Program (NEP), Highly Hazardous Chemicals (HHC), Chemical Safety Board (CSB), Mechanical Integrity (MI), Center for Chemical Process Safety (CCPS), Risk Based Process Safety (RBPS)

Abstract
We all agree on the common stance that no one in any industry desires the occurrence of an accident. This belief is a common premise no matter what respective industry one may work in or for. A serious fire, a permanent injury, toxic release or the fatality of an employee or owner can cause the loss of profit, reputation or even an entire business. Even if you are not a facility or small company that manages Highly Hazardous Chemicals and happen to fall under the OSHA Process Safety Management or EPA Risk Management Program, you still want to prevent such losses. One may not have a major budget to implement extravagantly structured safety, health and compliance management systems that may bring success but are very expensive to maintain for smaller or midsize facilities. [3] You do, however, need to understand your risks and apply recognized EHS measures to mitigate and manage those risks.

The OSHA PSM regulatory standard prescribes fourteen explicit elements that are required to be in place for manufacturing facilities that fall under the standard. To many smaller or mid-sized, moderately regulated (or non-regulated) manufacturing sites, OSHAs PSM standard might not be a logical or realistic fit unless you are in a facility that works with or around highly hazardous chemicals (HHCs) [5]. However, it would be a very tremendous mistake to think that there are no parts of the OSHA PSM standard or guideline that do not apply to these in some way, shape or form. In addition, many if not most of the activities performed by maintenance, construction and engineering groups at small non-regulated or non-chemical facilities are governed and regulated by the same industry codes and standards required for larger OSHA PSM facilities. The only real difference may be in the level and degree of risk, documentation and resources required to maintain the programs. However, in the eyes of this presenter, it wouldn’t be a bad practice to document your activities as if you were under the watchful eyes of OSHA through a PSM program [6].