

From: Johnson, Amanda <Amanda.Johnson@csb.gov>
Sent: Wednesday, October 17, 2018 10:02 AM
To: Enos, Tari D (LNI)
Cc: Engler, Richard; Barbee, Charles
Subject: Washington Draft PSM Priority Topics for the US Chemical Safety Board

Hi Tari,

The US Chemical Safety Board (CSB) would appreciate further discussion of the following issues/topics concerning Draft 2 of the WA PSM regulation:

1. Although “turnarounds” are now incorporated into “outages”, they still don’t appear to include unplanned shutdowns. Can you discuss the reasoning behind that?
2. How are atmospheric storage tanks treated under the proposed regulation?
3. The indicators section does not list specific indicators to track or a mechanism for the regulator to collect and analyze this data. On the other hand, the newly updated CalARP Regulation in California requires the collection and reporting of much more detailed indicator data. Can DOSH discuss the thought process behind the lack of detailed requirements in this section?
4. Could DOSH explain why compliance audits don’t have to include documentation of deficiencies and corrective actions taken?
5. Under Emergency Planning and Response, why did DOSH take out the requirement for the employer to document the nature and agreement between itself and any expected assistance from an external emergency response organization, including drills, scenarios, response time sequences, and debrief action items?
6. Is every section of the regulation meant to include a requirement for employee collaboration? What is the intent? It is a little confusing.

Thank you,

Amanda Johnson

Amanda Johnson
Office of Recommendations
U.S. Chemical Safety Board
Office: (303) 236-0107
Cell: (202) 459-3930
Email: amanda.johnson@csb.gov

