

2.64 Petroleum Refinery Process Safety Management

February 8, 2008

I. Purpose

The federal Occupational Safety and Health Administration (OSHA) issued CPL 03-00-004, effective June 7, 2007, which describes policies and procedures for implementing a National Emphasis Program (NEP) to reduce or eliminate the workplace hazards associated with the catastrophic release of highly hazardous chemicals at petroleum refineries. Washington State has 5 refineries within the scope of OSHA CPL 03-00-004 and advised OSHA that DOSH will adopt and implement this NEP.

II. Scope

This directive applies statewide to all DOSH operations. It requires staff to follow the directions in CPL 03-00-004 when conducting inspections of or providing consultation services to petroleum refineries.

III. References

Chapter 296-67 WAC, Process Safety Management of Highly Hazardous Chemicals
WRD 1.95, Workplace Safety and Health Complaints
WRD 2.62, PSM Inspection Targeting & Tracking
WRD 24.10, Process Safety Management
DOSH Compliance Manual
OSHA CPL 03-00-004, Petroleum Refinery Process Safety Management National Emphasis Program
OSHA CFR 1910.119

IV. Compliance and Consultation Protocols

- A. Only DOSH staff meeting the qualifications described in OSHA CPL 03-00-004, Section X(C) will perform inspections or provide consultation services to petroleum refineries.

- B. When CPL 03-00-004 references another CPL for inspection or enforcement guidance, staff will use Table 1 to identify whether DOSH has an equivalent policy/directive. If an equivalent DOSH policy exists, staff must follow the guidance in the directive. If DOSH does not have an equivalent directive, staff must follow the guidance in the referenced CPL.

Staff will use Table 2 to identify the WAC equivalent to the CFR rules referenced in the CPL. If no equivalent rule has been identified, staff will contact the DOSH technical services representative for guidance.

**Table 1
Equivalent DOSH Policies for CPL 03-00-004**

OSHA policy:	DOSH equivalent:
CPL 02 (SST 07)	Site-Specific Targeting (excluding construction) WRD 2.16, Targeting WISHA Activities (Logging) WRD 2.17, Targeting WISHA Activities (Agriculture) WRD 2.18, Targeting WISHA Activities (Maritime Industries) WRD 2.19, Targeting WISHA Activities (Electrical Utilities and Communication) WRD 2.20, Targeting WISHA Activities (Local Emphasis Programs)
CPL 02-00-025	WRD 2.10, Targeting WISHA Activities (General) DOSH Compliance Manual (Programmed Inspections)
CPL 02-00-094	No DOSH equivalent. Follow CPL and/or Contact Technical Services representative for guidance.
CPL 02-00-103	DOSH Compliance Manual
CPL 02-00-137	DOSH Compliance Manual (Fatality/Catastrophe Inspections) WRD 2.11, Significant Inspections
CPL 02-00-140	DOSH Compliance Manual (Complaints and Referrals) WRD 1.95, Workplace Safety and Health Complaints
CPL 02-01-037	Follow CPL and contact technical advisor for guidance. Compliance policy for emergency action plans and fire prevention plans
CPL 02-02-045	WRD 2.62, PSM Inspection Targeting & Tracking WRD 24.10, Process Safety Management

**Table 2
Equivalent DOSH Rules for CPL 03-00-004**

Topic:	OSHA Standards:	DOSH Equivalent:
Purpose	Purpose	296-67-001(1)
Application	<u>1910.119(a)(1)</u>	296-67-001(2)(a)
Definitions	<u>1910.119(b)</u>	296-67-005
Employee participation	1910.119(c)	296-67-009
Process safety information	1910.119(d)	296-67-013
Process hazard analysis	1910.119(e)	296-67-017
Operating procedures	1910.119(f)	296-67-021
Training	1910.119(g)	296-67-025
Contractors	1910.119(h)	296-67-029
Pre-startup safety review	1910.119(i)	296-67-033
Mechanical integrity equivalent	1910.119(j)	296-67-037
Hot work permit	1910.119(k)	296-67-041
Management of change	1910.119(l)	296-67-045
Incident investigation	1910.119(m)	296-67-049
Emergency planning and response	1910.119(n)	296-67-053
Compliance audits	1910.119(o)	296-67-057
Trade secrets	1910.119(p)	296-67-061
List of Highly Hazardous Chemicals, Toxics and Reactives	1910.119 App A	296-67-285



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Approved:

Department of Labor and Industries
Division of Occupational Safety and Health

For further information about this or other DOSH Directives, you may contact the Division of Occupational Safety & Health at P.O. Box 44650, Olympia, WA 98504-4650 – or by telephone at (360) 902-5530. You may also review policy information on the DOSH website (<http://www.lni.wa.gov/Safety>).

