

			<p>team members for comment is missing.</p> <p>Corrective Action: Consider adding the following phrase: “...<i>be provided to all team members for comments and must...</i>”</p> <p>At (15) there is a need for language requiring the employer to retain documentation of PSM team recommendations and the corresponding corrective actions and their implementation taken by the employer.</p> <p>At (15), consider adding the sentence, “All recommendations, corrective actions, timelines, MOCs and other documentation generated pursuant to this section must be retained for the life of the process.”</p>	<p>investigating a process incident.</p> <p>The Implementation section is where all of the work of PSM is translated from paper into actual process safety improvements. Documenting the final implementation step is essential for the employer, employees, and DOSH to understand the safety of a process and its changing status over time. Documentation is the foundation of transparency and accountability, which is essential to an effective regulation, and to continuous improvement in process safety management. Implementation documents for a process and its related equipment are also essential to any investigation by DOSH into a process safety incident.</p>

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			properly controlled.
23	25	Emergency Planning and Response	At (2), while we have recommended test changes to clarify this paragraph, WA's proposed requirements will help improve the effectiveness and safety of an emergency response to a refinery by external response organizations.
24	25	Compliance Audits	At (2), WA has required the employer to consult with operators in each audited process and document the findings and recommendations from these consultations. This is important in evaluating the effectiveness of the audit, in that the audit findings can be compared with workers' input.
25	26	Compliance Audits	At (4), WA has required the employer to make the audit report available to employees and their representatives and respond in writing to any written comments submitted by same. These are all important when trying to ensure the validity and effectiveness of the auditing process. Without a feedback process, the objectivity and thoroughness of the report could be uncertain.
26	26	Damage Mechanism Review	Adoption of the concept of a rigorous damage mechanism review is an important step in improving process safety for refineries. This is another example of an industry best practice integrated into PSM requirements.
27	29	Hierarchy of Hazard Controls Analysis	Adoption of HCA concepts requires the employer to methodically evaluate the refinery, in an effort to identify opportunities to improve the effectiveness of safeguards and incorporate inherently safer technologies.
28	32	Process Safety Culture Assessment	Process safety culture is not a new concept. Integrating safety culture assessment into PSM the rules in order to improve a site's current culture and develop actions to drive a safer "Way things are done around here" is an absolutely necessary element of an effective safety program. Where honest effort, adequate resources and employee involvement have been invested in culture assessment efforts, positive results have been realized.
29	33	Human Factors	Adoption of requirements for the employer to evaluate and understand the interaction between the worker and the work environment is essential to improving process safety.

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30	35	Management of Organizational Change	Adopting management of organizational change requirements is critical to avoiding negative impacts to process safety programs. Understanding how a proposed organizational change might affect a single position or a group of employees allows identification of problems before they are implemented. MOOC is an essential part of any effective MOC work process.
31	36	PSM Program	Adopting the requirements in the PSM Program section make it clear that the refinery's PSM program needs to be integral to every piece of the facility's operation, a concept that needs to be supported from the highest level of site management.
32	36	Implementation	Adopting PSM language that includes clear timelines for completion of reports and implementation of corrective actions is an essential part of ensuring that opportunities for process safety improvements are addressed in a timely manner. In the absence of clear time requirements, an action plan following an incident investigation, for instance, might not be assigned and implemented for months, if not years, after the incident. The timeframes proposed in the draft Implementation section are reasonable and appropriate.

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