

## **PROCESS SAFETY MANAGEMENT OF HIGHLY HAZARDOUS CHEMICALS**

The requirements of this standard, promulgated in 1992, cover processes involving listed highly hazardous chemicals at specified quantities. Even though the standard states that it applies to any “process which involves a flammable liquid...on site in one location in a quantity of 10,000 lbs. or more ***except for...flammable liquids stored in atmospheric tanks or transferred which are kept below their normal boiling point without benefit of chilling or refrigeration***”, OSHA maintained that the exemption was only limited to storage tanks that were not connected to a process. Therefore, they would often cite fabricators who had resin storage tanks and didn’t have a PSM program in place.

On May 12, 1997, a directive was issued to OSHA Regional Administrators stating that “the judge ruled that coverage under OSHA’s Process Safety Management Standard does not extend to stored flammable in ‘atmospheric tanks,’ even if they were connected to a ‘process’ within the definition of the standard...Until the standard is revised, OSHA will not cite 1910.119 (PSM) under circumstances when coverage of the process would be based partly or solely on the quantity of flammable liquid in connected atmospheric storage tanks, that would otherwise qualify for the...exemption.”

OSHA withdrew its plans to re-open the standard until further notice on September 24, 2001 due to resource constraints and other priorities. Therefore, if your facility was only covered by the Process Safety Management standard because of resin bulk storage tanks, it is now exempt. Most fabricators will not have to worry about the standard at this time unless they store 5,000 lbs. or more of certain listed organic peroxides on-site.

***If you would like a copy of the standard, a list of the covered chemicals or a copy of the memorandum exempting flammables in atmospheric tanks from the standard, please contact the Composites One’s Department of Health, Safety & Environment at 800/621-8003.***