

Employee Participation

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Does a written program exist regarding employee participation?	5189(q)	1910.119(c)(1)			
2. Does the written program specify how employees will be involved in each PSM and RM Program element?					
3. Were employees and their representatives involved in the PSM and RM Program development and updates?	5189(q)(1)	1910.119(c)(2)			
a. During the preparation and review of operating procedures?					
b. During the conduct and development of the PHA?					
c. During incident investigations?					
d. During PSM and RM Program audits?					
e. During modifications to the system?					
f. During the updating & implementation of other PSM and RM Program elements?					

Employee Participation

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
4. Has the participation of employees and their representatives been documented?					
5. Does the written program provide employees (including contractor employees) and their representatives access to process hazard analyses and all other information developed as required by the PSM Standard and RM Program Rule?	5189(q)(2)	1910.119(c)(3)			
a. Is the access offered during employee's initial orientation?					
b. Is access offered to existing employees?					
6. Is the PSM and RM Program including the PHA reports available to all employees?	N/A	1910.119(c)(3)			

Process Safety Information

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Has written process safety information been compiled before conducting any process hazard analyses (PHA's)? NOTE: Where the original technical information no longer exists, such information may be developed in conjunction with the process hazard analysis in sufficient detail to support the analysis.	5189(d)	1910.119(d) & 1910.119(d)(2)(ii)			
2. Is the process safety information readily available to facility personnel?	5189(d)(4)	N/A			
3. Does the facility have up-to-date Safety Data Sheets (SDS's) for all hazardous materials used or produced by the process?	N/A	1910.119(d)(1)(vii)			
4. Do the SDS's or other information pertaining to the hazards of the highly hazardous chemicals used or produced by the process include:	5189(d)(1)	1910.119(d)(1)			
a. Toxicity information?	5189(d)(1)(A)	1910.119(d)(1)(i)			
b. PEL's?	5189(d)(1)(B)	1910.119(d)(1)(ii)			
c. Physical data?	5189(d)(1)(C)	1910.119(d)(1)(iii)			
d. Reactivity data?	5189(d)(1)(F)	1910.119(d)(1)(iv)			
e. Corrosivity data?	5189(d)(1)(D)	1910.119(d)(1)(v)			

Process Safety Information

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
f. Thermal and chemical stability data?	5189(d)(1)(E)	1910.119(d)(1)(vi)			
g. Hazardous effects of inadvertent mixing of different materials that could foreseeably occur?	5189(d)(1)(G)	1910.119(d)(1)(vii)			
5. Does information concerning the technology of the process include:	5189(d)(2)	1910.119(2) & 1910.119(d)(2)(i)			
a. A block flow diagram or simplified process flow diagram?	5189(d)(2)(A)	1910.119(d)(2)(i)(A)			
b. Process chemistry?	5189(d)(2)(B)	1910.119(d)(2)(i)(B)			
c. Maximum intended inventory including calculations and inventory records as applicable?	5189(d)(2)(C)	1910.119(d)(2)(i)(C)			
d. Safe upper and lower limits?	5189(d)(2)(D)	1910.119(d)(2)(i)(D)			
e. Consequences of deviating from the upper and lower limits?	5189(d)(2)(E)	1910.119(d)(2)(i)(E)			
6. Does the process equipment information include:	5189(d)(3)	1910.119(d)(3) & 1910.119(d)(3)(i)			
a. Materials of construction?	5189(d)(3)(A)(1)	1910.119(d)(3)(i)(A)			

Process Safety Information

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
b. Field verified piping and instrument diagrams (P&ID'S)?	5189(d)(3)(A)(2)	1910.119(d)(3)(i)(B)			
c. Information on the electrical classification?	5189(d)(3)(A)(3)	1910.119(d)(3)(i)(C)			
d. Relief system design and design basis for relief devices and headers?	5189(d)(3)(A)(4)	1910.119(d)(3)(i)(D)			
e. Ventilation system design?	5189(d)(3)(A)(5)	1910.119(d)(3)(i)(E)			
f. Design codes and standards employed?	5189(d)(3)(A)(6)	1910.119(d)(3)(i)(F)			
g. Material and energy balances for processes built after May 26, 1992 (RMP) or September 1, 1992 (PSM)?	5189(d)(3)(A)(7)	1910.119(d)(3)(i)(G)			
h. Safety systems (e.g. interlocks, detection or suppression systems)?	5189(d)(3)(A)(8)	1910.119(d)(3)(i)(H)			
i. Electrical supply and distribution systems?	5189(d)(3)(A)(9)	N/A			
7. Does the facility have appropriate manufacturer data sheets (such as U-1 forms), equipment drawings, and IOM manuals for the equipment in the process?					

Process Safety Information

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
8. Has the employer documented that equipment complies with recognized, generally accepted good engineering practices?	5189(d)(3)(B)	1910.119(d)(3)(ii)			
9. Is there any existing equipment that was designed and constructed in accordance with codes, standards, or practices no longer in general use?	5189(d)(3)(C)	1910.119(d)(3)(iii)			
a. Is this equipment designed, maintained, inspected, tested, and operating in a safe manner?					

Process Hazard Analysis

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Does the facility have multiple covered processes?	5189(e)(1)	1910.119(e)(1)			
a. If so, did the employer determine and documented a priority order for conducting initial PHA's based on a rationale that include the extent of process hazards, number of potentially affected employees, age of process, and operating history?					
b. Was the initial PHA completed prior to May 26, 1997?	N/A	1910.119(e)(1)(iv)			
2. Have the initial PHA's for all covered processes been completed?					
3. Was one or more of the following PHA methodologies used:	5189(e)(1)	1910.119(e)(2)			
a. Checklists?	5189(e)(1)(B)	1910.119(e)(2)(ii)			
b. What-if?	5189(e)(1)(A)	1910.119(e)(2)(i)			
c. What-if/Checklists?	5189(e)(1)(C)	1910.119(e)(2)(iii)			
d. Hazard & Operability Study (HAZOP)?	5189(e)(1)(D)	1910.119(e)(2)(iv)			

Process Hazard Analysis

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
e. Failure Mode and Effects Analysis (FMEA)?	5189(e)(1)(E)	1910.119(e)(2)(v)			
f. Fault Tree Analysis (FTA)?	5189(e)(1)(F)	1910.119(e)(2)(vi)			
g. Other appropriate methodology?	N/A	1910.119(e)(2)(vii)			
4. Does the PHA address the following:	5189(e)(2)	1910.119(e)(3)			
a. The hazards of the process?	5189(e)(2)(A)	1910.119(e)(3)(i)			
b. Previous incidents with likely potential for catastrophic consequences?	5189(e)(2)(G)	1910.119(e)(3)(ii)			
c. Consequences of failure of engineering and administrative controls?	5189(e)(2)©	1910.119(e)(3)(iv)			
d. Engineering and administrative controls applicable to the hazards and their interrelationships?	5189(e)(2)(B)	1910.119(e)(3)(iii)			
e. Facility siting (especially concerning the location of control rooms)?	5189(e)(2)(D)	1910.119(e)(3)(v)			
f. Human factors?	5189(e)(2)(E)	1910.119(e)(3)(vi)			

Process Hazard Analysis

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
g. A qualitative evaluation of a range of possible safety and health effects of failure of controls on employees in the workplace?	N/A	1910.119(e)(3)(vii)			
5. Were the PHA's performed by appropriate teams that contained the following expertise:	5189(e)(3)	1910.119(e)(4)			
a. A team leader trained in the appropriate PHA methodology?	5189(e)(3)(A)	1910.119(e)(4)			
b. Expertise in engineering?	5189(e)(3)(A)	1910.119(e)(4)			
c. At least one employee with operations experience and knowledge specific to the process being evaluated?	5189(e)(3)(A)	1910.119(e)(4)			

Process Hazard Analysis

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
6. Are affected employees consulted where appropriate or their recognized representatives on the development and conduct of hazard assessments performed? Do affected employees and where applicable their representatives provided access to the records required by this section?	5189(e)(3)(B)	N/A			
7. Is there a system in place to promptly follow up on recommendations identified during the PHA?	5189(e)(4)	1910.119(e)(5)			
a. Were the recommendations resolved in a timely manner?	5189(e)(4)	1910.119(e)(5)			
b. Develop a schedule of when these actions are to be completed?	5189(e)(4)	1910.119(e)(5)			
c. Were the actions taken and the associated implementation schedule documented?	5189(e)(4)	1910.119(e)(5)			

Process Hazard Analysis

Question	CalOSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
8. Were the results of the PHA studies reviewed with operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions?					
9. Have the PHA's been updated and revalidated by a qualified team at least every five years?	5189(e)(5)	1910.119(e)(6) & 1910.119(e)(1)(v)			
10. Are copies of all PHA's and the resolution of the PHA recommendations kept on file for the life of the process?	5189(e)(6)	1910.119(e)(7)			

Operating Procedures

Question	Cal OSHA	OSHA Code	A	Remarks	Recommendations
References:					
1. Do written operating procedures exist for each covered process that provide clear instructions for conducting activities safely?	5189(f)(1)	1910.119(f) & 1910.119(f)(1)			
2. Do the operating instructions address, as a minimum, steps for each of the following operating phases:	5189(f)(1)(A)	1910.119(f)(1)(i)			
a. Initial start-up?	5189(f)(1)(A)(1)	1910.110(f)(1)(i)(A)			
b. Normal operations?	5189(f)(1)(A)(2)	1910.110(f)(1)(i)(B)			
c. Temporary operations?	5189(f)(1)(A)(3)	1910.110(f)(1)(i)(C)			
d. Emergency shutdowns?	5189(f)(1)(A)(4)	1910.110(f)(1)(i)(D)			
e. Conditions requiring emergency shutdown?	N/A	1910.110(f)(1)(i)(D)			
f. Assignment of shutdown responsibility to qualified operators?	5189(f)(1)(A)(4)	1910.110(f)(1)(i)(D)			
g. Emergency operations such as chemical leak, fire, or power failure procedures?	5189(f)(1)(A)(4)	1910.110(f)(1)(i)(E)			
h. Normal shutdown?	5189(f)(1)(A)(5)	1910.110(f)(1)(i)(F)			

Operating Procedures

Question	Cal OSHA	OSHA Code	A	Remarks	Recommendations
References:					
i. Start-ups following a turnaround or emergency shutdown?	5189(f)(1)(A)(6)	1910.110(f)(1)(i)(G)			
j. Chemical charging procedures?					
k. Pump out and equipment isolation procedures?					
l. Sampling procedures?					
m. Oil draining procedures?					
3. Do the operating procedures include (or refer to) the following process safety information:					
a. Operating limits?	5189(f)(1)(B)	1910.110(f)(1)(ii)			
b. Consequences of operating outside operating limits?	5189(f)(1)(B)(1)	1910.110(f)(1)(ii)(A)			
c. Steps to correct or avoid deviations from operating limits?	5189(f)(1)(B)(2)	1910.110(f)(1)(ii)(B)			
d. Description and setpoints of safety systems?	5189(f)(1)(B)(3)	1910.110(f)(1)(iv)			
4. Is the information in the operating procedures consistent with the process safety information?					

Operating Procedures

Question	Cal OSHA	OSHA Code	A	Remarks	Recommendations
References:					
5. Do the operating procedures include, at a minimum, the following safety and health considerations:	5189(f)(1)(C)	1910.110(f)(1)(iii)			
a. Properties of, and hazards presented by, chemicals used in the process?	5189(f)(1)(C)(1)	1910.110(f)(1)(iii)(A)			
b. Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment?	5189(f)(1)(C)(2)	1910.110(f)(1)(iii)(B)			
c. Control measures to be taken if physical contact or airborne exposure occurs?	5189(f)(1)(C)(3)	1910.110(f)(1)(iii)(C)			
d. Quality control for raw materials and control of hazardous chemical inventory levels?	5189(f)(1)(C)(5)	1910.110(f)(1)(iii)(D)			
e. Any special or unique hazards?	5189(f)(1)(C)(6)	1910.110(f)(1)(iii)(E)			
6. Are the operating procedures readily accessible to system operators and mechanics?	5189(f)(2)	1910.110(f)(2)			

Operating Procedures

Question	Cal OSHA	OSHA Code	A	Remarks	Recommendations
References:					
7. Have the operating procedures been reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to facilities?	5189(f)(3)	1910.110(f)(3)			
8. Have operating procedures been certified at least annually that that are current and accurate?	5189(f)(3)	1910.110(f)(3)			
9. Do the operating procedures reflect current facility operations and are they being followed?	5189(f)(3)	1910.110(f)(3)			
10. Have safe work practices been developed?	5189(f)(4)	1910.110(f)(4)			
a. Lockout/tagout?					
b. Confined Space Entry?					
c. Opening Process Equipment or Piping?					
d. Control over entrance into the facility by maintenance, contractor, laboratory, or other support personnel?					

Employee Training

Question	Cal OSHA	OSHA Code	A	Remarks	Recommendations
References:					
1. Has each employee and contractor employee been trained before being involved in a newly assigned process?	N/A	1910.119(g) & 1910.119(g)(1)			
2. Do records exist that document initial and refresher training for employees and contractors involved in operating and maintaining the process?	5189(g)(1) & 5189(g)(2)	1910.119(g)(1)(ii)			
3. Do the training records contain:	5189(g)(3)	1910.119(g)(3)			
a. The identity of the employee?					
b. The identity of the instructor?					
c. The date of the training?					
d. The means used to verify that the employee understood the training?	5189(g)(4)				

Employee Training

Question	Cal OSHA	OSHA Code	A	Remarks	Recommendations
References:					
4. Is there written documentation to verify that appropriate employees have been “grandfathered” from initial training? Note: In lieu of initial training for those employees already involved in operating a process on May 26, 1992, an employer may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures.	N/A	1910.119(g)(1)(ii)			
5. Has the training included, at a minimum, the following items:	5189(g)(1)	1910.119(g)(1)(i)			
a. Safety and health considerations including the hazards of the chemicals involved?					
b. An overview of the process?					
c. Steps for each operating phase in the written operating procedures?					
d. Emergency shutdown procedures and operations?					

Employee Training

Question	Cal OSHA	OSHA Code	A	Remarks	Recommendations
References:					
e. Process safety information including steps required to avoid or correct deviations from operating limits and safety systems and their functions?					
f. Use of appropriate PPE?					
6. Is refresher training conducted at least every three years?	5189(g)(2)	1910.119(g)(2)			
a. Were the employees consulted in determining the frequency for refresher training?	5189(g)(2)	1910.119(g)(2)			

Contractor Safety

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Does the program include all contractors that work on or near covered processes? Note: This program applies to contractors performing maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. It does not apply to contractors providing incidental services which do not influence process safety, such as janitorial work, food and drink services, laundry, delivery or other supply services.	5189(h)(1)	1910.119(h) & 1910.119(h)(1)			
2. Have company representatives been identified to coordinate contract employee activities?					
3. Is the information regarding the contractor's safety performance and programs obtained and evaluated for selection of contractors?	5189(h)(5)	1910.119(h)(2)(i)			
4. Is there a contractor training program that informs contractors, prior to the initiation of the contractors' work on site, of the following items:					

Contractor Safety

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
a. Know potential fire, explosion, or toxic release hazards related to their work and the processes?	5189(h)(1)	1910.119(h)(2)(ii)			
b. Applicable provisions of the emergency action and response plan?	5189(h)(2)	1910.119(h)(2)(iii)			
c. Site entrance procedures?	N/A	1910.119(h)(2)(iv)			
d. Site safety programs?	5189(h)(1)	1910.119(h)(2)(iv)			
e. Procedures to report injuries and any facility hazards?					
5. Are contract employees periodically evaluated for their performance in fulfilling the following obligations:	5189(h)(3) & 5189(h)(6)	1910.119(h)(2)(v)			
a. Assure their employees are trained in safe work practices needed to perform the job?	5189(h)(3)	1910.119(h)(3)(i)			

Contractor Safety

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
b. Assure their employees are instructed in the known potential hazards related to the job and the applicable provisions of the emergency action and response plan?	5189(h)(4)	1910.119(h)(3)(ii)			
c. Document the required training and the means to verify their employees have understood the training?	5189(h)(4)	1910.119(h)(3)(iii)			
d. Assure their employees follow site safety rules and work practices?	5189(h)(4)	1910.119(h)(3)(iv)			
e. Advise the employer of unique hazards presented by the contractor's work?	5189(h)(4)	1910.119(h)(3)(v)			
6. Are appropriate actions taken when an employer identifies deficiencies in the performance of contract employees?					
7. Does the employer maintain a contract employee injury and illness log related to the contractor's work in process areas?	5189(h)(7)	1910.119(h)(2)(vi)			

Management of Change Pre-Startup Safety Review

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Are there written MOC procedures in place?	5189(l)(1)	1910.119(l) & 1910.119(l)(1)			
2. Were MOC procedures followed for all changes except for "replacements-in-kind"?	5189(l)(1)	1910.119(i)(1)			
3. Were the MOC procedures completed before the changes were implemented?					
4. Did the MOC files document the following information:	5189(l)(2)	1910.119(l)(2)			
a. Technical basis of the change?	5189(l)(2)(A)	1910.119(l)(2)(i)			
b. Safety and health review?	5189(l)(2)(B)	1910.119(l)(2)(ii)			
c. P&ID's and other safety information were updated?	5189(l)(4)	1910.119(l)(4)			
d. Operating and maintenance procedures were updated?	5189(l)(2)(C) & 5189(l)(5)	1910.119(l)(2)(iii) & 1910.119(l)(5)			
e. Training of system operators, mechanics, and contractors were completed?	5189(l)(3)	1910.119(l)(3)			
f. Necessary time period for the change?	5189(l)(2)(D)	1910.119(l)(2)(iv)			
g. Authorization requirements for the proposed change?	5189(l)(2)(E)	1910.119(l)(2)(v)			

Management of Change Pre-Startup Safety Review

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
5. Do the MOC forms contain all appropriate authorization signatures?					
6. Has a pre-startup safety review been performed for all new facilities and for modified facilities when the modification is significant enough to require a change in process safety information?	5189(i)(1)	1910.119(i)(1)			
7. Do pre-startup safety reviews confirm that prior to the introduction of highly hazardous chemicals to a process that:	5189(i)(2)	1910.119(i)(2)			
a. Construction and equipment is in accordance with design specifications?	5189(i)(2)(A)	1910.119(i)(2)(i)			
b. Safety, operating, maintenance, and emergency action and response procedures are in place and adequate?	5189(i)(2)(B)	1910.119(i)(2)(ii)			
c. For new facilities, a PHA has been performed and recommendations resolved or implemented before startup?	5189(i)(2)(C)	1910.119(i)(2)(iii)			

Management of Change Pre-Startup Safety Review

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
d. Modified facilities meet management of change requirements?	5189(i)(2)(C)	1910.119(i)(2)(iii)			
e. Training of each employee involved in operating the process has been completed?	5189(i)(2)(D)	1910.119(i)(2)(iv)			
8. Does the Pre-Start Up Safety Review involve employees with expertise in process operations and engineering? Are the employees selected based upon their experience and understanding of the process systems being evaluated?	5189(i)(3)				

Mechanical Integrity

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Does the written mechanical integrity program include all appropriate equipment in the process?	5189(j)	1910.119(j)(i-vi)			
2. Are there written procedures to maintain the on-going integrity of process equipment?	5189(j)(1)	1910.110(j)(2)			
a. Is there a work order system in place to perform the work?					
b. Does the documentation indicate the procedures have been implemented?					
c. Do the procedures include a method for allowing employees to identify and report potentially faulty or unsafe equipment and to record their observation and suggestions in writing?	5189(j)(1)(A)(1) & 5189(j)(1)(A)(2)	N/A			
3. Does the facility respond regarding the disposition of the employee's concerns contained in the reports in a timely manner?	5189(j)(B)	N/A			

Mechanical Integrity

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
4. Has the facility provided employees and their representatives access to the information?	5189(j)(C)	N/A			
5. Has training been provided to maintenance personnel on:		1910.110(j)(3)			
a. An overview of the process and its hazards?					
b. Procedures applicable to the job tasks?					
6. Are inspections and tests that follow good engineering practices, manufacturer's recommendations, & more frequently if determined to be necessary by prior operating experience performed on the following equipment:	5189(j)(2)(C)	1910.110(j)(4)(i) & 1910.110(j)(4)(ii)			
a. Pressure vessels and storage tanks?					
b. Piping systems and components such as valves?					
c. Insulation?					
d. Relief and vent systems and devices?					
e. Emergency shutdown systems (stop switches, shut-off valves, etc)?					

Mechanical Integrity

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
f. Safety controls, alarms and interlocks?					
g. Fixed chemical sensors?					
h. Hand-held chemical sensors?					
i. Compressors including alarms and cutouts?					
j. Pumps?					
k. Periodical oil analysis?					
l. Periodic vibration analysis?					
m. Corrosion inspections (such as non-destructive testing)?					
n. Filters and strainers?					
o. Instrument calibration?					
7. Are the frequency of inspections and tests of process equipment consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience?	5189(j)(2)(B)	1910.119(j)(4)(iii)			

Mechanical Integrity

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
8. Is there documentation of each inspection and test that includes the following items:	5189(j)(2)(D)	1910.119(j)(4)(iv)			
a. Date of the inspection or test?					
b. Name of person performing the procedure?					
c. Serial number or other identifier of equipment on which procedure was performed?					
d. Description of inspection or test performed?					
e. Results of inspection or test?					
9. Are deficiencies in equipment that are outside limits corrected before further use or in a safe and timely manner when necessary means are taken to assure safe operation?	5189(j)(3)	1910.119(j)(5)			
10. In the construction of new plants and equipment, does the employer assure:					
a. Work is performed by qualified personnel?					

Mechanical Integrity

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
b. Equipment is suitable for the process for which it will be used?	5189(j)(4)(A)	1910.110(j)(6)(i)			
c. Checks and inspections been made to assure equipment is installed properly and consistent with design specifications and manufacturer's instructions?	5189(j)(4)(B)	1910.110(j)(6)(ii)			
d. Appropriate tests (NDT, vacuum, pressure, etc.) have been performed prior to start-up?					
e. Appropriate commissioning records (material specs, test results, X-ray test records, welders procedures) have been obtained and filed?					
11. Does the employer assure that maintenance materials, spare parts, and equipment are suitable for the process application for which they are used?	5189(j)(4)(C)	1910.110(j)(6)(iii)			

Mechanical Integrity

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
12. Based on the site inspections, is there evidence that any equipment is not properly maintained or is operating outside of acceptable limits?					
13. Have five-year mechanical integrity audits been completed?					

Safe Work Practices

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Have hot work permits been issued for all hot work operations conducted on or near a process covered by this standard?	5189(k)(1)	1910.119(k)(1)			
2. Is the permit kept on file until completion of the hot work operations?	5189(k)(2)	1910.119(k)(2)			
3. Does the facility have designated areas:					
a. Where hot work permits are not required?					
b. Where hot work is prohibited (explosive atmospheres, where sprinklers are impaired, etc.).					
4. Do the hot work permits include:					
a. The date(s) hot work is to be performed?					
b. Location of hot work?					
c. Welders and fire watch personnel?					
d. Specific safety requirements for hot work (identify cracks & openings, partitions, welding blankets?					

Safe Work Practices

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
5. Are fire watches assigned where a major fire might develop?					
6. Is the area physically inspected before the hot work is authorized?					
7. Are fire extinguishers readily available?					
8. Are welders, fire watchers, and supervisors training in the permit procedures?					
9. Do contractors follow hot work permit procedures?					
10. Have lockout/tagout procedures been developed and implemented at the facility including:					
a. Equipment-specific lockout procedures?					
b. Appropriate locks and tags?					
c. A training program?					
d. Periodic inspections?					
e. Are there procedures for removing locks?					

Safe Work Practices

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
f. Are there appropriate distinctions between tagging and locking requirements?					
11. Have confined space entry procedures been developed and implemented at the facility including:					
a. Survey of all plant facilities?					
b. Have all confined spaces been labeled?					
c. Procedures to initiate a confined space permit?					
d. Rescue and emergency services?					
e. Appropriate confined space equipment?					
f. A training program including periodic rescue drills?					
12. Have procedures been developed to control entrance into the facility by maintenance, contractor, laboratory, and other support personnel?					
13. Is a respiratory protection plan in place at the facility?					

Safe Work Practices

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
14. Have other safe work practices, such as area work permits, been developed and implemented for employees and contractors as appropriate?					

Incident Investigation

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Has each incident been investigated which resulted in, or could reasonably have resulted in a catastrophic release of highly hazardous chemicals in the workplace?	5189(m)(1)	1910.119(m)(1)			
2. Does the facility have procedures to address and document the resolution of "minor" incidents such as odor complaints?					
3. Have incident investigation been initiated as promptly as possible, but not later than 48 hours following the incident?	5189(m)(2)	1910.119(m)(2)			
4. Were the investigations performed by appropriate teams that contained the following expertise:	5189(m)(3)	1910.119(m)(3)			
a. A leader with knowledge of investigation techniques?					
b. Expertise in engineering?					
c. At least one employee with operations experience and knowledge specific to the process being evaluated?					

Incident Investigation

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
d. A contract employee if appropriate?					
5. Have incident investigation reports been prepared at the conclusion of the investigation which include:	5189(m)(4)	1910.119(m)(4)			
a. Date of the incident?	5189(m)(4)(A)	1910.119(m)(4)(i)			
b. Date the inspection began?	5189(m)(4)(B)	1910.119(m)(4)(ii)			
c. A description of the incident?	5189(m)(4)(C)	1910.119(m)(4)(iii)			
d. The factors that contributed to the incident?	5189(m)(4)(D)	1910.119(m)(4)(iv)			
e. Any recommendations resulting from the investigation?	5189(m)(4)(E)	1910.119(m)(4)(v)			
6. Is there a system in place to promptly follow up on recommendations identified during the investigation?	5189(m)(6)	1910.119(m)(5)			
a. Were the recommendations resolved in a timely manner?					
b. Were the actions taken and the associated implementation schedule documented?					

Incident Investigation

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
7. Were the results (report) of the investigation reviewed with operating, maintenance and other employees (or contractors) whose work assignments are in the process and who may be affected by the investigation findings or recommendations?	5189(m)(5) & 5189(m)(8)\	1910.119(m)(6)			
8. Are all investigation reports kept on file for at least five years?	5189(m)(7)	1910.119(m)(7)			

Emergency Planning Response

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Does the facility have a written emergency action plan?					
2. Is the plan up to date?					
3. Is the plan reviewed and updated on a regular basis?					
4. Is the plan critiqued following emergency activities?					
5. Is the plan readily available for employees?					
6. Does the plan include the following items:					
a. Escape procedures and routes?	3220(b)(1)	1910.38(c)(2)			
b. Procedures for post-evacuation employee accounting?	3220(b)(3)	1910.38(c)(4)			
c. Preferred means to report emergencies?	3220(b)(5)	1910.38(c)(1)			
d. Duties and procedures of employees who remain to operate critical equipment?	3220(b)(2)	1910.38(c)(3)			
e. Perform rescue and medical duties?	3220(b)(4)	1910.38(c)(5)			

Emergency Planning Response

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
f. The names of persons or locations to contact for more action plan information or an explanation of their duties under the plan?	3220(b)(6)	1910.38(c)(6)			
g. Employee alarm systems?	3220(c)	1910.38(d)			
7. Is there sufficient number of person designated and trained to assist in the safe and orderly emergency evacuation of employees?	3220(e)(1)	1910.38(e)			
8. Are evacuation maps and signs posted throughout the facility and are they illuminated properly?					
9. Are employees trained:					
a. Initially when the plan is developed?	3220(e)(2)(A)	1910.38(f)(1)			
b. During their initial site orientation?	3220(e)(2)(A)	1910.38(f)(1)			
c. During regular refresher training?					
d. Whenever their responsibilities change?	3220(e)(2)(B)	1910.38(f)(2)			
e. Whenever the plan changes?	3220(e)(2)(C)	1910.38(f)(3)			
10. Are there procedures for handling small releases?					

Emergency Planning Response

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
11. Does the facility have a central alarm system?					
12. Are the alarms:	6184(b)	1910.165(a)			
a. Distinctive and recognizable for each purpose of the alarm?	6184(b)(4)	1910.165(b)(1)			
b. Can be heard above ambient noise and light levels by all employees in the affected portions of the workplace?	6184(b)(3)	1910.165(b)(2)			
c. Are procedures to initiate the alarm clearly established?	6184(b)(2)	1910.165(b)(3)			
d. Does the alarm take priority over routine communication?	N/A	1910.165(b)(4)			
e. Are emergency telephone number/instructions posted?	N/A	1910.165(b)(4)			
f. Are manual alarms unobstructed, conspicuous, and readily accessible?	6184(e)	1910.165(e)			
g. Maintained in operating condition?	6184(d)(1)	1910.165(d)(1)			

Emergency Planning Response

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
h. Tested appropriately and restored to normal operating condition as soon as possible after test?	6184(c)(2)	1910.165(c)(2)			
i. Non-supervised systems tested not less than every two months?	6184(d)(2)	1910.165(d)(2)			
j. Supervised systems tested at least annually?	6184(d)(4)	1910.165(d)(2)			
k. Serviced, maintained, and tested by appropriately trained persons?	6184(d)(1)	1910.165(d)(5)			
l. Is a back-up system (such a runners or phones) available?	6184(d)(3)	1910.165(d)(3)			
12. Does the facility have procedures to respond to accidental chemical releases?					
13. If the facility does not respond:					
a. Is the facility included in the community emergency response plan?					

Emergency Planning Response

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
b. Are there mechanisms in place to notify emergency responders?					
14. If the facility has emergency response procedures, have the following items been included:	5189(q)(1)	1910.120(p)			
a. Personnel roles, lines of authority, training, and communication?	5189(q)(2)(B)	1910.120(p)(8)(ii)(B)			
b. Emergency recognition and prevention?	5189(q)(2)(C)	1910.120(p)(8)(ii)(C)			
c. Safe distances and places of refuge?	5189(q)(2)(D)	1910.120(p)(8)(ii)(D)			
d. Site security and control?	5189(q)(2)(E)	1910.120(p)(8)(ii)(E)			
e. Evacuation routes and procedures?	5189(q)(2)(F)	1910.120(p)(8)(ii)(F)			
f. Medical treatment and first aid?	5189(q)(2)(H)	1910.120(p)(8)(ii)(H)			
g. Procedures for internal and external alerting notifications?	5189(q)(2)(I)	1910.120(p)(8)(ii)(I)			
h. Procedures to respond to specific emergencies?	5189(q)(3)	1910.120(p)(8)(iv)(B)			
i. Decontamination?	5189(q)(2)(G)	1910.120(p)(4)			

Emergency Planning Response

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
j. Emergency alerting and response procedures?	5189(q)(2)(I)	1910.120(p)(8)(ii)(I)			
k. Critique of response and follow-up?	5189(q)(2)(J)	1910.120(p)(8)(ii)(J)			
l. Location and use of PPE and emergency equipment?	5189(q)(2)(K)	1910.120(p)(8)(ii)(K)			
m. Procedures to inspect, test and maintain PPE and emergency equipment?	5189(q)(2)(K)	1910.120(p)(8)(ii)(K)			
n. Coordination with outside parties including providing information to local officials to develop and implement the community response plan if requested?	5189(q)(2)(L)	1910.120(p)(8)(iv)(A)(2)			
15. Is the buddy system practiced on all responses?	5189(q)(3)(E)	1910.120(d)(3)			
16. Have members of the HAZMAT team been provided with 24 hour initial and 8 hour annual refresher training?					
17. Has the emergency coordinator and designated alternates been provided with additional training on the Incident Command System?					

Emergency Planning Response

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
18. Are members of the HAZMAT team provided with baseline physicals and medical surveillance?					
19. Are drills conducted at the facility?					

Compliance Audits

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
1. Has the employer certified in writing that there has been a PSM and RM Program compliance audit at least every three years?	N/A	1910.119(o) & 1910.119(o)(1)			
2. Did the audit include evaluation of all PSM and RM Program elements?					
3. Were the audits performed by appropriate teams that contained the following expertise:					
a. A leader with knowledge of the PSM Standard and the RM Program Rule?	N/A	1910.119(o)(2)			
b. At least one employee with operations experience and knowledge specific to the process being evaluated?	5189(o)(1)	N/A			
4. Has a report of the findings been developed for each audit?	N/A	1910.119(o)(3)			
5. Is there a system in place to promptly follow up on recommendations identified during the audit?	N/A	1910.119(o)(4)			
a. Were the recommendations resolved in a timely manner?					

Compliance Audits

Question	Cal OSHA Code	OSHA Code	A	Remarks	Recommendations
References:					
b. Were the actions taken and the associated implementation schedule documented?					
6. Are the two most recent audit reports on file?	N/A	1910.119(o)(5)			