API Comments on OSHA Draft Process Safety Management Guidelines for Explosives and Pyrotechnics Manufacturing
September 29, 2016

OSHA Guidance Document Text	API Comment/Rationale	Suggested Alternative
Purpose		
The term "explosives" shall include all material which is classified as Class A, Class B and Class C explosives by the U.S. Department of Transportation ..."	This is inconsistent with current industry language.	Change explosive classifications to appropriate current designations.
Information on the technology of the process must include at least the following: • Diagrams (Block, Process Flow)	Regulatory requirement is for block or process flow, not both.	Change highlighted wording to "block or process flow"
Process Safety Information		
Information on the Process Equipment Facilities in which the processes are purely mechanical (not chemical) without piping, typically will not have P&IDs. However, all facilities with a fire suppression system must have a P&ID for that system.	Facilities that house process unit suppression systems should require P&IDs, but it is unnecessary to have P&IDs in all buildings.	Revise the highlighted wording to state: "PSM processes with a fire suppression system shall have a P&ID for that system."
Operating Procedures		
Identification of hazard areas and limitations on the number of authorized personnel in the hazard area will ensure that the minimum numbers of personnel are exposed to the hazard. The procedures must be available to all operators, and be accurate and current. Although the PSM standard requires the employer to annually certify that operating procedures are current and adequate, it is recommended that the operating procedures be reviewed prior to each use to verify that only the most current version of the operating procedures being used before proceeding.	It is not required by PSM to identify hazard areas and limitation on the number of authorized personnel in the hazard area. It is unclear whether operating procedures must be reviewed prior to each use to simply verify that the most current version is being used or to determine if the procedure is current and accurate. The procedure control process maintains that procedures are current and accurate.	Reconsider the wording of "Identification of hazard areas and limitations on the number ..." OSHA should clarify whether this is a requirement or a recommendation from a separate industry standard. Delete the highlighted sentence.
Training		
NFPA 495 contains examples of minimum training requirements.	This piece of guidance is too prescriptive, so the wording should be changed.	Revise draft wording from "requirements" to "recommendations."
Mechanical Integrity		
However, OSHA recommends that employers include all safety critical equipment used in the process in the mechanical integrity	This guidance document statement is beyond the scope of the regulation.	Delete the highlighted sentence.

program, and not just those items currently required by PSM standard.		
Each inspection and test that has been performed must be documented to verify current equipment integrity. Aspects of the mechanical integrity program include... shutdown systems. Additionally, transfer equipment, visual and electrical inspections of the lightning protection system, response time tests of the deluge system, area warning system tests, and building grounding system checks are a few of the many items that the maintenance program should address to verify the "mechanical integrity" of the explosives manufacturing systems and facilities.	The reference to transfer equipment is vague and not easily understood.	Change “transfer equipment” to a term which is more universal. Replace the highlighted text with “maintenance program may need to address.”