## Process Safety Management Overview



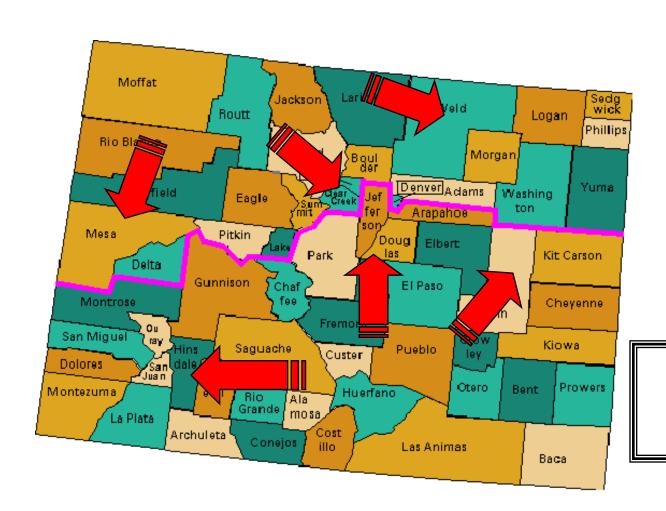
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## What Can We Expect?

- Determine coverage under the PSM standard
- Provide a brief overview of the PSM standard
- Describe the National Emphasis Program for inspections of PSM covered chemical facilities
- Clarify recent letters of interpretation and policy updates for PSM covered facilities
- OSHA inspection procedures
- Discuss compliance assistance resources
- Questions

#### **Denver AO - 303-844-5285**



**Englewood AO 303-843-4500** 

#### What is PSM?

• 29 CFR 1910.119:

 Requirements for safe management of hazards associated with processes using, storing, manufacturing, or handling highly hazardous chemicals.

 Emphasizes management of hazards through comprehensive program that integrates established technologies, procedures and practices

## **PSM History**

- Years of unexpected releases of toxic, reactive or flammable liquids and gases in processes involving highly hazardous chemicals
- Incidents/disasters resulting in death and injury
- Proposed standard published 1990
- Clean Air Act Amendments enacted 1990
- Final Rule issued 1992



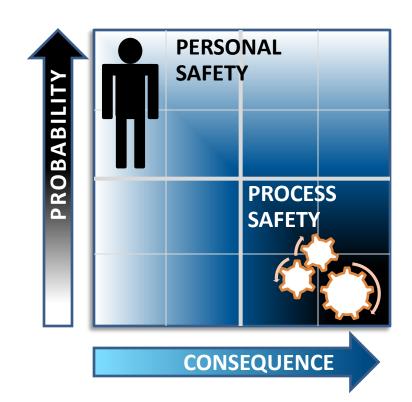
## Personal Safety vs. PSM



- A superior personal safety record does not necessarily mean a facility's process safety performance is acceptable.
- OSHA often encounters facilities with superior personal safety records that have had a major process safety incident.

## Personal Safety vs. PSM

- PROCESS SAFETY incidents are low probability/ high consequence events.
- Conversely, PERSONAL SAFETY incidents tend to arise from higher probability/ lower consequence events.
- Process safety requires a strong MANGEMENT SYSTEMS approach to identify and control hazards.



### **Process Safety Management Elements**

- (a) Application
- (b) Definitions
- (c) Employee Participation
- (d) Process Safety Information
- (e) Process Hazard Analysis
- (f) Operating Procedures
- (g) Training
- (h) Contractors

- (i) Pre-Startup Safety Review
- (j) Mechanical Integrity
- (k) Hot Work Permits
- (I) Management of Change
- (m) Incident Investigation
- (n) Emergency Planning and Response
- (o) Compliance Audits
- (p) Trade Secrets

#### What is covered?

- Processes including:
  - 10,000 pounds of flammable liquids or gasses

- Threshold quantity (TQ)of a highly hazardous chemical (HHC)
  - 130+ chemicals listed in Appendix A
  - Toxic and/or reactive chemicals

## Appendix A

| CHEMICAL NAME               | 1   | CAS*      | 1 | T0**  |
|-----------------------------|-----|-----------|---|-------|
| WILLIAM WELL THEM IN        |     | CAL       | ì |       |
|                             | -;- |           | ï |       |
| Acetaldehyde                | 1   | 75-07-0   | I | 2500  |
| Acrolein (2-Popenal)        |     | 107-02-8  | I | 150   |
| Acrylyl Chlorde             | 1   | 814-68-6  | 1 | 250   |
| Allyl Chlorid               |     | 107-05-1  | 1 | 1000  |
| Allylamine                  |     | 107-11-9  | I | 1000  |
| Alkylaluminum               | -   | Varies    | 1 | 5000  |
| Ammonia, Anhydrous          |     | 7664-41-7 | I | 10000 |
| Ammonia solutions (greater  | -   |           | I |       |
| than 44% ammonia by weight) |     | 7664-41-7 | 1 | 15000 |
| Ammonium Perchlorate        |     | 7790-98-9 | 1 | 7500  |
| Ammonium Permanganate       | 1   | 7787-36-2 | I | 7500  |

#### What is covered?

- Example: Ammonia
  - TQ > 10,000 pounds for anhydrous (gas) ammonia
  - Mostly used in refrigeration





### What isn't covered?

- Retail facilities
- Oil or gas well drilling or servicing operations
- Normally unoccupied remote facilities
- Hydrocarbon fuels used solely for workplace consumption (ie vehicle refueling)
- Flammable liquids with flash point below 100F and stored in atmospheric tanks and kept below boiling point without refrigeration

## **Process Safety Information (PSI)**

 Employers must compile written process safety information (PSI)

Hazards of the HHCs used/produced

Technology of the process

Equipment in the process

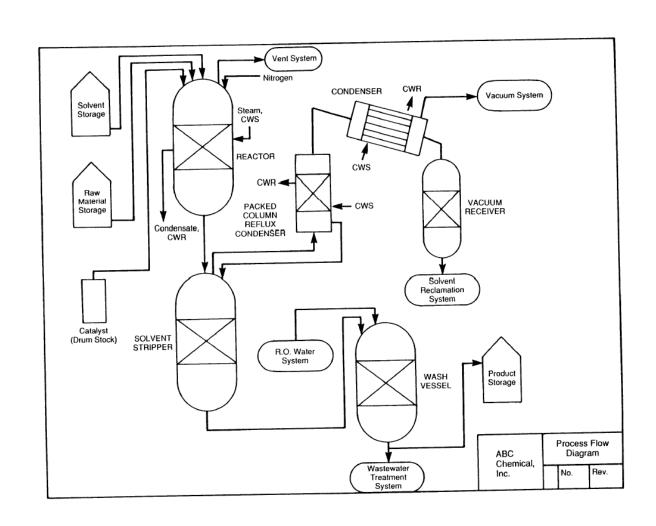
#### **PSI**

- Process Hazards
  - Permissible exposure limits (PEL)
  - Physical data
  - Reactivity data
  - Corrosivity data
  - Thermal/chemical stability
  - Effects of mixing
- SDS may be source

#### **PSI**

- Process Technology
  - Block flow diagram/process flow diagram
  - Process chemistry
  - Maximum intended inventory
  - Safe upper/lower limits
    - temperatures, pressures, flows, compositions, pH
  - Evaluation of consequences of deviation

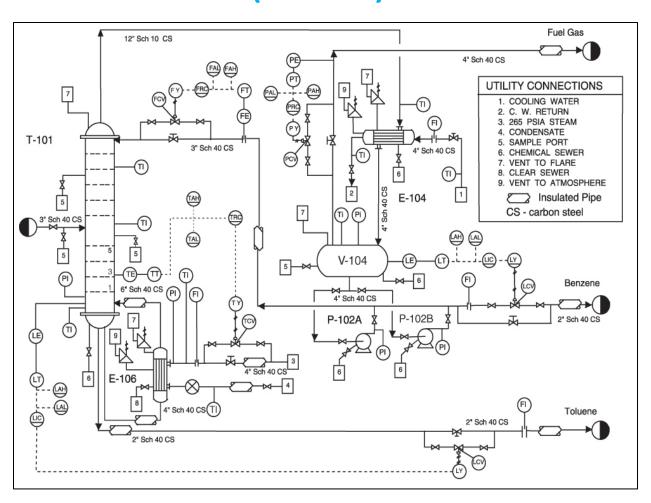
## Process Flow Diagram



### **PSI**

- Process Equipment
  - Materials of construction
  - Piping and Instrumentation diagrams (P&IDs)
  - Electrical classification
  - Relief system design and design basis
  - Ventilation system design
  - Design codes and standards (ASME, API, ANSI, CGA, IIAR, etc)
  - Material and energy balances (built after 1992)
  - Safety systems (interlocks, detection, suppression)

# Piping and Instrumentation Diagram (P&ID)



#### **PSI**

 The employer shall document that the equipment complies with Recognized and Generally Accepted Good Engineering Practices (RAGAGEP)

- ASME, CGA, API, ANSI, IIAR, etc
- RAGAGEP also applies to Mechanical Integrity

 RAGAGEP is for equipment design, inspection and testing, and frequency of inspection and testing

#### **PSI**

#### Examples of RAGAGEP

- ASME (American Society of Mechanical Engineers)
- ANSI (American National Standards Institute)
- CGA (Compressed Gas Association)
- API (American Petroleum Institute)
- ASTM (American Society for Testing and Materials)
- IIAR (International Institute of Ammonia Refrigeration)
- Manufacturer (Operations/Maintenance manuals)
- Internal RAGAGEP

## Process Hazard Analysis (PHA)

- PHA is a thorough, systematic approach for identifying, evaluating and controlling the hazards of processes involving HHCs
  - The employer must perform a PHA on all covered processes
  - The PHA format must meet the complexity of the process
  - The PHA must identify, evaluate, and control the hazards involved in the process

#### PHA

- PHA Methods
  - What-if
  - Checklist
  - What-if/checklist
  - Hazard and operability study (HAZOP)
  - Failure mode and effects analysis (FMEA)
  - Fault tree analysis, or
  - An appropriate equivalent methodology

» See OSHA publication <u>3133</u> for more information

#### PHA

- PHA shall address:
  - Hazards of the process
  - Prior incidents
  - Engineering and administrative controls
  - Consequences of failure of those controls
  - Facility siting
  - Human factors
- Shall be performed by a team
- Shall establish a system to address findings
- Revalidation every 5 years

## **Operating Procedures**

- Written operating procedures for safely conducting activities in each covered process
- Covering:
  - Initial startup, normal/temporary/emergency operations, shutdowns
  - Operating limits, consequences of deviation, and steps required to correct
  - Safety/Health considerations
    - Hazards of chemicals, unique hazards, material control
    - Engineering controls, administrative controls, PPE
    - Safety systems and their functions

## **Operating Procedures**

Must be readily available to employees

Reviewed as necessary to reflect current practices

Annual certification of review

## **Employee Participation**

 Employers must consult with employees and their reps on the development of the elements of process safety management

 Employers shall provide employee access to all information required by the PSM standard

 Employer shall develop a written plan regarding the implementation of employee participation

## **Training**

- Initial training in the process
  - Overview of process and ops procedures
  - Safety and health hazards
  - Emergency operations/shutdown
  - Safe work practices applicable to employee's tasks
- Refresher training at least every 3 years
- Documentation of training (must state the means by which the training was shown to be effective)

## Mechanical Integrity

- Written procedures for maintaining the ongoing integrity of:
  - Pressure vessels
  - Piping systems
  - Relief and vent systems and devices
  - Emergency shutdown systems
  - Controls (monitoring devices, sensors, alarms, interlocks)
  - Pumps

## Mechanical Integrity

- Inspection and testing of equipment shall follow RAGAGEP
- Maintenance employees shall be trained
- Inspections shall be documented
- Equipment deficiencies shall be corrected in a safe and timely manner (ensure safe operation)

## MI





Rusted and broken cable to the "snappy joe" shut off valve

Rusted cable repaired by attaching new cable to old rusted piece

## MI





Missing paint and rust on ammonia piping. No flow direction or phase markings. Color?



Broken pressure gauges

## Management of Change (MOC)

- Written procedures to manage changes to process chemicals, technology, equipment, and procedures that affect a covered process
  - technical basis for proposed change
  - impact of change on safety and health
  - modifications to operating procedures
  - time period for the change
  - authorization requirements for the change
- Does not include "replacements in kind"
- Requires updated PSI, op procedures, training

### The other elements...

- (a) Application
- (b) Definitions
- (c)Contractors
- (i) Pre-Startup Safety Review
- (k) Hot Work Permits

- (m) Incident Investigation
- (n) Emergency Planning and Response
- (o) Compliance Audits
- (p) Trade Secrets

# Appendix C (1910.119)

- Non-mandatory Compliance Guidelines
  - Detailed description of each element of the standard
  - Plain language summary and recommendations
  - Good introduction to the standard

| Chemider Citations by PSW Element |             |                       |       |  |
|-----------------------------------|-------------|-----------------------|-------|--|
|                                   |             |                       |       |  |
| Element                           | Description | % of PSM<br>Citations | Cum % |  |

26.9

19.6

15.3

10.5

5.2

4.7

3.6

3.4

3.2

2.1

1.3

1.1

0.4

26.9

49.2

64.5

74.9

80.1

84.9

88.5

91.9

95.1

97.2

98.5

99.6

100

Mechanical Integrity

**Process Safety Information** 

**Process Hazard Analysis** 

Management of Change

**Emergency Response and Planning** 

**Operating Procedures** 

**Compliance Audits** 

**Employee Participation** 

**Incident Investigation** 

Pre-startup Review

**Contractors** 

Training

**Hot Work** 

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| ChemNEP | Citations | by PSM | Llement |
|---------|-----------|--------|---------|
|         |           |        |         |
|         |           |        |         |

| Chemn | EP Cita | tions | by PSN | I Element |
|-------|---------|-------|--------|-----------|
|       |         |       |        |           |

### Process Safety Management Updates

Updated NEP

- PSM related memos/interpretations:
  - Appendix A Concentrations
  - Retail Exemption
  - RAGAGEP

# Chemical NEP Update for 2016

- Release was scheduled for April
- Updated to include refineries
  - Refinery inspections distributed based on total number per region
- Five targeting categories
  - Ammonia refrigeration 25 percent
  - Ag ammonia 10 percent
  - Refineries based on total per region
  - Chemical facilities (NAICS 325) 40 percent
  - Other 25 percent

# Change to 1992 Retail Exemption

- Retail Exemption Interpretation
  - Aligns OSHA method with commerce department NAICS Codes
  - Only retail groups 44 and 45 are granted the retail exemption from PSM
    - Sale of...small allotments...to the general public
  - Biggest impact on NAICS 424910 Farm Supply Merchant Wholesalers
    - However, over 130 unique NAICS codes were using the old interpretation

# Change to 1992 Retail Exemption

- Retail Exemption
  - Enforcement Delay
    - No enforcement until October 1, 2016
    - PSM program development is complex
  - Compliance assistance is critical

July 22, 20

MEMORANDUM FOR:

REGIONAL ADMINISTRATORS STATE PLAN DESIGNEES

THROUGH: DOROTHY DOUGHERTY

Deputy Assistant Secretary

FROM: THOMAS GALASSI, Director

ROM: THOMAS GALASSI, Director
Directorate of Enforcement Programs

SUBJECT: Process Safety Management of Highly Hazardous Chemicals and Application of the Retail Exemption (29 CFR 1910.119(a)(2)(i))

This memorandum revises the Occupational Safety and Health Administration's (OSHA) interpretation of the exemption of retail facilities from coverage of the Process Safety Management of Highly Hazardous Chemicals (PSM) standard (29 CFR 1910.119). The revision is in accordance with the President's August 1, 2013, Executive Order 13650, Improving Chemical Facility Safety and Security. (1911) and Security (1911) are revision in accordance with the President's August 1, 2013, Executive Order 13650, Improving Chemical Facility Safety and Security. (1911) are revision in accordance with the President's August 1, 2013, Executive Order 13650, Improving Chemical Facility Safety and Security. (1911) are revision in accordance with the President's August 1, 2013, Executive Order 13650, Improving Chemical Facility Safety and Security. (1911) are revision in accordance with the President's August 1, 2013, Executive Order 13650, Improving Chemical Facility Safety and Security. (1911) are revision in accordance with the President's August 1, 2013, Executive Order 13650, Improving Chemical Facility Safety and Security. (1911) are revision in accordance with the President's August 1, 2013, Executive Order 13650, Improving Chemical Facility Safety and Security. (1911) are revision in accordance with the President's August 1, 2013, Executive Order 13650, Improving Chemical Facility Safety and Security Safety and Security Safety Safe

The PSM standard contains an exemption from coverage for retail facilities at 29 CFR 1910.119(a)(2)(i). Although the term "retail facility" is not defined, the preamble to the final PSM standard explains that Chemicals in retail facilities are generally sold in small packages, containers, and allotments (37 FR 6356, 6369 - February 24, 1992). The preamble gives the example of gasoline stat as a type of facility but would typically outsify for the exemption.

Other Federal Government agencies define retail facilities in similar terms. In particular, the U.S. Department of Commerce, which is responsible for the development of the North American Industry Classification System (NAICS) that organizes businesses into specific industrial sectors for economic and statistical purposes, characterizes retail trade as follows:

The Retail Trade sector comprises establishments engaged in retailing merchandise, generally without transformation, and rendering services incidental to the sale of merchandise. The retailing process is the final step in the distribution of merchandise; retailers are, therefore, organized to sell merchandise in small quantities to the general public. North American Industry Classification System Manual ("MAICS Manual"), Sector 44-45 - Retail Trade. (3)

Following the promulgation of the PSM standard, however, DSHS, usued a series of letters of interpretation and sataments in the PSM compliance directive (CFL 02-02-045) interpretation and consistent of the psm of the psm

In addition, the 50 percent test allows employers who sell or distribute large, bulk quantities of highly hazardous chemical directly to one dusers to claim the exemption, even if the end users are themselves commencial establishments. This result is directly contray to OSAH's original intent, as stated in the presenable to the PSM standard. There, OSAH said that it chose to exclude retail facilities from PSM coverage because the small container, package, or allotment sizes of the chemicals typically found at these facilities do not present the same safety hazards as establishments that handle large, bulk quantities of materials. The types of facilities described in the preamble generally fall into NAICS Sector 4-45 - Retail Track in contrast, facilities that should large, bulk quantities of materials typically fall into NAICS Sector 4-2 - Wholesale Trade - and include facilities that sell or arrange the purchase or sale of raw and intermediate materials and supplies used in the production of other end or outcomes. Because the executions is limited secondarily to retail facilities, it should mere have been intervened to cover facilities.

As a result, OSHA hereby rescinds all prior policy documents, letters of interpretation, and memoranda related to the retail exemption and the 50 percent test. OSHA now interprets the retail facilities exemption in accord with its original intent, and in reference to the widely-accepted NAICS Manual:

Only facilities, or the portions of facilities, engaged in retail trade as defined by the current and any future updates to sectors 44 and 45 of the NAICS Manual may be afforded the retail exemption at 29 CFR 1910.119(a)(2)(i).

OSHA will also update the statement of policy related to retail facilities in the PSM compliance directive (CPL 02-02-045) consistent with this new interpretation. Therefore, a compliance safety and health officer (CEN) may recommend issuance of a clariton for any applicable volation(s) of the PSM Standard after determining that the employer's primary NAECT related to the safe of HAICS is samething other than a retail rade, as defined in NAICS sectors 44 or 45, and PSM coverage is otherwise established. The area office should contact the appropriate regional office or the Office of Chemical Process Self-val and Enforcement Institutives if there are ousestors recarding the employer's operations as the relate to the solid contact the appropriate regional office or the Office of Chemical Process Self-val and Enforcement Institutives if there are ousestors recarding the employer's operations as the relate to the solid contact the appropriate regional office or the Office of Chemical Process Self-val and Enforcement Institutives if there are ousestors recarding the employer's operations as they relate to the solid contact the appropriate regional office or the Office of Chemical Process Self-val and Enforcement Institutives if there are ousestors recarding the employer's operations as they relate to the solid contact the appropriate regional office or the Office of Chemical Process Self-val Enforcement Institutives if there are ousestors recarding the employer's operations as the relate to the solid contact the appropriate regional office or the Office of Chemical Process and the solid contact the appropriate regional office or the Office of Chemical Process and the Post of the Office of Chemical Process and the Post of the Office of Chemical Process and the Post of the Office of Chemical Process and the Post of the Office of Chemical Process and the Post of the Office of Chemical Process and the Post of the Post of the Office of Chemical Process and the Post of the Office of Chemical Process and the Post of the Off

If, during the course of an inspection, an employer claims it is eligible for the retail exemption, a CSHO should: (1) ask the employer to provide the basis for their retail exemption claim; and (2) review operations of the employer's facility to determine the validity of the exemption claim.

Appendix A contains example questions and answers related to the retail exemption to assist CSHOs in determining the application of this enforcement policy memorandum.

https://www.osha.gov/pls/oshaweb/owadisp.show\_document?p\_table=INTERPRE TATIONS&p\_id=29528

### **Listed PSM Chemicals**

- Memo on Appendix A Concentrations
  - Aligns OSHA method for calculating threshold quantities for PSM coverage with EPA RMP approach
  - 1% di minimus concentration
  - <10 mm Hg partial pressure not covered</p>
- No formal enforcement delay

# Appendix A (Concentrations)

| CHEMICAL NAME                | I   | CAS*      | I<br>I | TQ** |
|------------------------------|-----|-----------|--------|------|
| Dimethyldichlorosilane       | _ _ | 75-78-5   | 1_     | 1000 |
| Dimethylhydrazine 1.1-       | 1   | 57-14-7   | 1      | 1000 |
| Dimethylamine, Anhydrous     | 1   | 124-40-3  | 1      | 2500 |
| 2 4-Dinitroaniline           | 1   | 97-02-9   | 1      | 5000 |
| Ethyl Methyl Ketone Peroxide | 1   |           | 1      |      |
| (also Methyl Ethyl Ketone    | 1   | 1         | 1      |      |
| Peroxide; concentration      | 1   | 1         | 1      |      |
| greater than 60%)            | 1   | 1378-23-4 | 1      | 5000 |

# How Does OSHA come to inspect a facility?

- Programmed Inspections
  - National, Regional or Local Emphasis Programs

- Unprogrammed Inspections
  - Complaints (from employees or their reps)
  - Referrals (from other sources)
  - Reports of fatalities or accidents

### FY 15 NEP's

- Amputations in Manufacturing
- Lead Exposures (GI and Construction)
- Silica Exposures (GI and Construction)
- Hexavalent Chromium Exposures
- Chemical Processing Safety
- Combustible Dust
- Trenching and Excavation
- Primary Metals Industries (Foundries)
- Nursing Homes
- Isocyanates

### FY 16 Regional and Local EPs

- Regional Emphasis Programs
  - Fall Hazards in Construction
  - Roadway Work Zone Activities
  - Silica in Cut Stone and Slab Handling
  - Oil and Gas Industry
  - Grain Handling Facilities
  - Workplace Violence in Residential Intellectual and Developmental Disability Facilities
- Local Emphasis Programs
  - Hazards in Automotive Services (Billings/Bismarck/Englewood)
  - Asbestos Abatement (Englewood)
  - Scrap & Recycling (Englewood)
  - Wood Manufacturing and Processing (Billings)

### Inspection Procedures

- Opening Conference
  - Explain the purpose, nature and scope of the inspection
  - Background information
  - Answer questions
- Walkaround Inspection
  - Observe worksite, look for hazards
  - Employee Interviews
  - Potential sampling/measurement
- Closing Conference

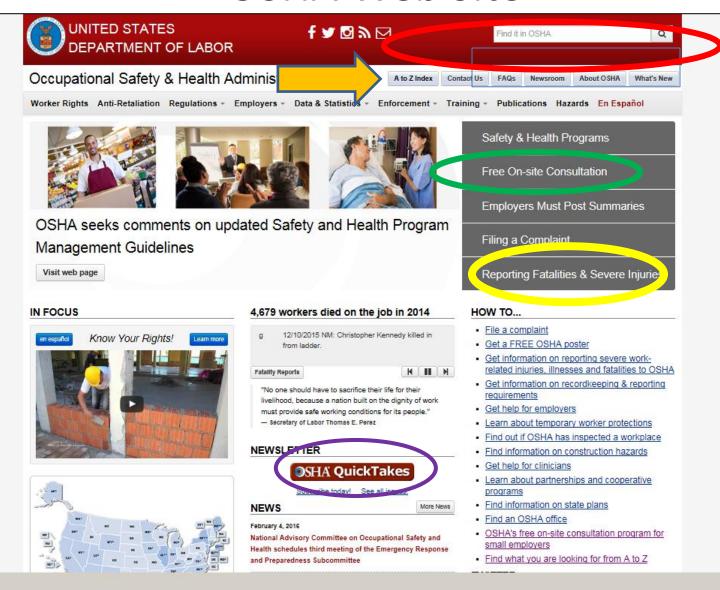
### Inspection Procedures (continued)

- Closing Conference
  - Discuss validity of complaint items
  - Discuss findings/hazards observed
  - Discuss abatement
  - Discuss employer rights/possible citations

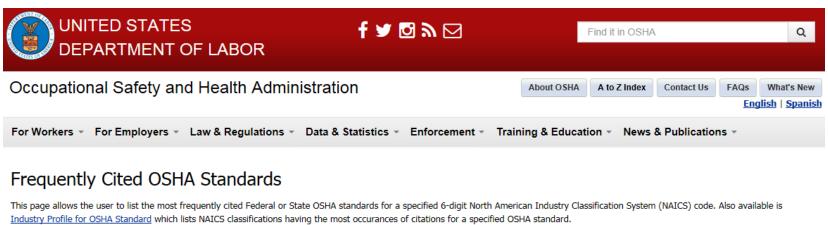
### Tips for a Successful OSHA Inspection

- Know the hazards in your industry
- Know the hazards of your office operations
- Know your injury history/trends
- OSHA Top 10
- Written Programs and Training Records
- Prepare your staff to participate

### **OSHA Web Site**



### Frequently Cited OSHA Standards



### Select number of employees in establishment:

| (                              | All ○ 1-9 ○ 1-19 ○ 1-99 ○ 20-49 | 9 🔾 20-99 🔾 50-99 🔾 100-249 🔾 1-249 🔾 250+ |                                |
|--------------------------------|---------------------------------|--|--------------------------------|
| Federal or State Jurisdiction: | Federal                         | NAICS:                                     | (Submit empty for NAICS list.) |
|                                |                                 | Submit                                     |                                |

The data shown reflects OSHA citations issued by the Federal or State OSHA during the specified fiscal year; see definitions. If you are interested in obtaining the NAICS code for a particular industry, references are available on the NAICS Manual. This manual contains descriptions of every NAICS sector.



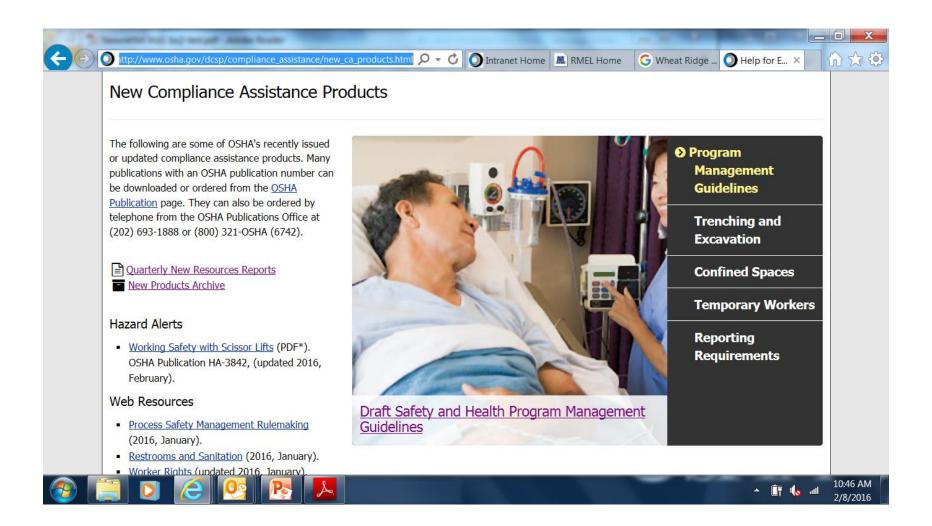
### **OSHA Consultation**

- Free
- Non-enforcement
- Confidential
- On-site audits
- Training
- Sampling/Monitoring
- Program Review



http://csucvmbs.colostate.edu/academics/er hs/osha/Pages/default.aspx

### **OSHA Compliance Assistance**



# **OSHA Compliance Assistance**

 Regional Compliance **Assistance Newsletter** 

 Send request to olaechea.john@dol.gov to subscribe

### **OSHA Region VIII Compliance Assistance Newsletter**

### Spring 2016

OSHA's On-site Consultation Program offers free and confidential safety and occupational health advice to small and medium-sized businesses. To find a program office near you, click on the man



### Work Safely with Silica

The Center for Construction Research and Training (CPWR) has created an e-tool that takes employers through a step-by-step assessment of their workplace and assists them in determining appropriate dust controls and creating a written plan to minimize silica dust haz-

Control the Dust

Click Here

Top Stories/National News

The Occupational Safety and Health Administration (OSHA) has issued a final rule to curb lung cancer, silicosis chronic obstructive pulmonary disease and kidney disease in America's workers by limiting their exposure to respirable crystalline silica. The rule is comprised of two standards one for Construction and one for General Industry and Maritime. The new rule requires that employers use engineering controls - such as ventilation and wet meth ods for cutting and sawing crystalline silicacontaining materials - to

OSHA issued this rule because the previous permissible exposure limits (PELs) for silica were outdated inconsistent and did not

silica dust

health. OSHA determined silicosis, lung cancer, other

About 2.3 million workers

are exposed to respirable

OSHA Issues Final Rule for Respirable Crystalline Silica

reduce workers' exposure to

adequately protect worker

that occupational exposure to respirable crystalline silica at the previous PFI's resulted in significant risk of developing or dving from

> industry operations such as brick manufacturing foundries, and hydraulic fracturing, also known as fracking. The Final Rule is projected to provide net benefits of about \$7.7 bilion, annually.

> > The construction standard

Volume 1. Issue 3

crystalline silica in their work

drill, cut, crush, or grind silica

-containing materials such as

places, including 2 million

construction workers who

concrete and stone, and

300,000 workers in general

provides for flexible alternatives, especially useful for small employers. Emplovers can either use a conlung diseases or kidney distrol method employed in Taease. OSHA estimates that ble 1 or they can measure the rule will save over 600 workers' exposure and indelives and prevent more than pendently determine which 900 new cases of silicosis dust control methods work each year, once its effects best to limit exposures in are fully realized. their workplaces.

SOME KEY PROVISIONS OF THE SILICA STANDARD:

- Reduces the permissible exposure limit (PEL) for respirable crystalline silica to 50 micrograms per cubic meter of air (50ug/m3) as an 8-hour average
- Requires employers to use engineering controls to
- Requires employers to provide respirators when engineering controls cannot adequately limit exposures
- Requires employers to develop a written control plan
- Requires employers to offer medical exams to highly

### COMPLIANCE DEADLINES

Construction June 23, 2017

General Industry/ Maritime: June 23, 2018

Hydraulic Fracturing: June 23, 2018 for all provisions except Engineering Controls, which have a compliance date of June 23 2021

# QUESTIONS?

### Disclaimer

• This information has been developed by an OSHA Compliance Assistance Specialist and is intended to assist employers, workers, and others as they strive to improve workplace health and safety. While we attempt to thoroughly address specific topics, it is not possible to include discussion of everything necessary to ensure a healthy and safe working environment in a presentation of this nature. Thus, this information must be understood as a tool for addressing workplace hazards, rather than an exhaustive statement of an employer's legal obligations, which are defined by statute, regulations, and standards. Likewise, to the extent that this information references practices or procedures that may enhance health or safety, but which are not required by a statute, regulation, or standard, it cannot, and does not, create additional legal obligations. Finally, over time, OSHA may modify rules and interpretations in light of new technology, information, or circumstances; to keep apprised of such developments, or to review information on a wide range of occupational safety and health topics, you can visit OSHA's website at www.osha.gov.



### Working Together, We Can Help

www.osha.gov

800-321-OSHA (6742)