



Safety Training & Environmental Protection, LLC

PO Box 1402 1205 Center Drive

Murray, KY 42071

Telephone: 270.753.6529 Fax 270.759.4196

www.stepky.com

Is YOUR Process Safety Management Program in Compliance with OSHA's NEP (National Emphasis Program)?

By Shannon Rule

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The National Emphasis Program (NEP) is an inspection program for facilities dealing with Highly Hazardous Chemicals (HHCs) to verify compliance with OSHA's process safety management standard (29 CFR 1910.119). It was started as a pilot program for one year, in 2009, after which it was evaluated and considered for renewal. On November 29, 2011, the new NEP standard went into effect.

Four types of companies are targeted:

- EPA Risk Management Program (RMP) Program 3 facilities
- Explosive Manufacturers
- Previously cited under PSM
- Identified by local OSHA Area office

Records subject to review in an NEP inspection typically include: employee attendance sheets, workers compensation reports, disciplinary records, incident reports, safety committee meeting minutes, accident investigation records, and FMLA records, among others. If the employer has a third-party medical and/or workers compensation provider, the investigator likely will seek to obtain records from them as well.

Be prepared! If OSHA shows up wanting to do an inspection at your facility, expect them to do the following:

- 1.) Supplement FOM Procedures
 - The procedures given in OSHA Instruction CPL 02-00-148, *Field Operations Manual (FOM)*, Chapter 3, will be followed.
- 2.) Conduct an Opening Conference
 - The facility's Safety and Health Director, Process Safety Manager, or other personnel qualified to discuss the PSM will be asked to attend. Chemicals in the facility will be discussed, as well as the emergency procedures in place.



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3.) Request documentation

- Copies of employee injury and illness logs, all PSM-covered processes, a list of all chemicals in the facility, a summary of the facility's PSM program, a list of all employees working with or around the selected unit, among others.

4.) Give a PSM overview

- The Safety and Health Director will be expected to explain the facility's PSM programs

5.) Put on required PPE

- Flame-retardant coveralls shall be worn as per company policy.
- The employer's operating procedures for PPE will be reviewed.

6.) Begin inspection with a brief initial walk around the facility

- OSHA will look for inconsistencies in the written procedures verses actual facility conditions.
- OSHA will get input from employees concerning potential PSM program deficiencies.

7.) Select an unit for inspection

- The Team Leader will select a unit for inspection, referred to as the Selected Unit.

8.) Inspect any contractors working with the selected unit

- All contractors working on or near the selected unit will be inspected. If there are none, another unit will be selected for inspection.

9.) Refer to compliance guidelines

- Refer to the dynamic list for guidance.

10.) Write citations, if necessary

- Citations will be issued according to CPL 02-00-148 –*FOM*

If your facility deals with HHCs, be prepared. OSHA can show up at a moment's notice, so you want to make sure your program is up to date and properly implemented. Don't be caught unprepared.