

Section 8	PRE-STARTUP SAFETY REVIEW EXAMPLE	Revision No.: 0 Date: April 1998 Page 1 of 4
{INSERT FACILITY IDENTIFICATION}		PROCESS SAFETY MANAGEMENT / RISK MANAGEMENT PROGRAM

8. PRESTARTUP SAFETY REVIEW

8.1 PURPOSE

A Prestartup Safety Review (PSSR) will be performed for new processes regulated under OSHA PSM and EPA RMP, and modified existing regulated processes when the modification is significant enough to require a change in the process safety information. The purpose of the PSSR is to ensure that the facility is ready to safely operate new and modified regulated processes.

8.2 SCOPE

PSSRs will be performed in conjunction with the Management of Change (MoC) procedure for major modifications to the covered systems at the facility. A major modification is defined as a modification that requires a change in process safety information. In addition, PSSRs will be performed for all new processes regulated under OSHA PSM and EPA RMP.

8.3 RESPONSIBILITIES

For new capital construction projects, the *{Engineering Manager}* is responsible for administering the PSSR program and ensuring that PSSRs are completed and documented whenever required. For capital construction projects, the PSSR should be completed by the *{Project Engineer}* and reviewed and approved by both the *{Project Engineer}* *{RMProgram Manager}* and the *{Plant Superintendent}*.

For modifications to existing systems at the facility that require a PSSR, the *{Plant Superintendent}* is responsible for implementing and documenting this procedure. The *{RMProgram Manager}* may assist the *{Plant Superintendent}*.

8.4 PROCEDURE

Prior to introducing a regulated chemical into a new or modified process, a PSSR will be performed and thoroughly documented. During the PSSR, the following items shall be confirmed and documented using the PSSR checklist provided as Attachment 8A to this section:

- Construction and equipment is in conformance with design specifications and applicable codes and standards.

Section 8	PRE-STARTUP SAFETY REVIEW EXAMPLE	Revision No.: 0 Date: April 1998 Page 2 of 4
{INSERT FACILITY IDENTIFICATION}		PROCESS SAFETY MANAGEMENT / RISK MANAGEMENT PROGRAM

- Applicable process safety information has been developed (or updated for a changed process).
- Plantwide safe work practices are adequate for the new/changed process conditions.
- SOPs and emergency procedures have been developed or updated as needed to ensure safe operation of the new/changed process.
- Maintenance procedures and a preventative maintenance (PM) schedule have been developed or updated as needed to ensure safe operation of the new/changed process.
- For new processes, a PHA has been performed and all recommendations have been resolved.
- For modified processes, the modification has been subjected to MoC review and all recommendations have been resolved or implemented before startup.
- Training of each employee involved in operating and/or maintaining the process has been completed and documented.

In addition, the facility may include a review of general safety provisions, including adequacy of fire protection systems, adequacy and location of safety equipment, adequacy of ventilation and lighting, review of area electrical classification, and use of equipment guards.

Any deficiencies noted during the PSSR should be documented and associated corrective actions listed. All corrective actions should then be assigned by the {Plant Superintendent} or {Project Engineer} to the appropriate staff (typically engineering, operations, or maintenance personnel) for follow-up. All corrective actions must be resolved and documented to complete the PSSR.

8.5 SCHEDULE

The PSSR will be completed before startup of the new or changed process. The PSSR procedure will be part of overall project engineering guidelines training for new project engineers.

8.6 RECORDKEEPING REQUIREMENTS

Required documentation will consist of the completed PSSR checklists (see Attachment 8A) for each new process or existing system modification requiring a PSSR. For capital construction projects, completed PSSR checklists are to be maintained by the {Project Engineer} and a copy will be retained by the {Plant Superintendent}. For process modifications that are not capital construction projects, PSSR checklists are to be maintained by the {Plant Superintendent}. The PSSR will be retained for the life of the process.

Section 8	PRE-STARTUP SAFETY REVIEW EXAMPLE	Revision No.: 0 Date: April 1998 Page 3 of 4
{INSERT FACILITY IDENTIFICATION}		PROCESS SAFETY MANAGEMENT / RISK MANAGEMENT PROGRAM

Attachment 8A

Prestartup Safety Review

PRESTARTUP SAFETY REVIEW FORM		Page 1 of 2		
Facility:		Date:		
SECTION 1: PROJECT DESCRIPTION - To be completed by Project Engineer or Plant Superintendent.				
Process:	New Facility []	Modification []		
PROJECT DESCRIPTION	<hr/> <hr/> <hr/>			
SECTION 2: CHECKLIST - To be completed by Project Engineer or Plant Superintendent.			<i>Circle Answer</i>	
The construction and equipment has been checked for conformance with design specifications and applicable codes and standards.			Yes No	
Applicable process safety information has been developed or updated as necessary to reflect the new/modified process.			Yes No	
Plantwide safe work procedures are adequate considering the new/modified process conditions.			Yes No	
Standard operating procedures and emergency procedures have been developed or updated as needed to ensure safe operation of the new/modified process.			Yes No	
Maintenance procedures and a preventative maintenance schedule have been developed or updated as needed to ensure safe operation of the new/modified process.			Yes No	
For new processes, a process hazard analysis has been performed and all recommendations have been resolved or implemented before startup.			Yes No	
For modified processes, the modification has been subjected to management of change review and all recommendations have been resolved or implemented before startup.			Yes No	
Training of each employee involved in operating and/or maintaining the process has been completed and documented.			Yes No	
SECTION 3: APPROVALS		<i>Circle Answer</i>		Date
Project Engineer		Approved	Disapproved	
Plant Superintendent		Approved	Disapproved	

