

Safety Bulletin

Process Hazard Analysis (PHA)

Recommendations



PHA Recommendations

When deficiencies in safeguards against hazardous scenarios are discovered as part of a Process Hazard Analysis (PHA) study, it is required that a recommendation is made in order to mitigate the concern identified.

Recommendations should be...

- *Stand Alone – The recommendation should provide all information required to be understood without additional documentation. This should include the PHA Team's justification for the recommendation.*
- *Non-Confining – The PHA Team should not look to make overly specific design solutions when developing the initial recommendation as it can put constraints on closure options. There should be flexibility in the solution determined by the implementation team.*
- *Justifiable – The recommendation will likely need to be accepted by management, who will often have concerns that include facility production output, profitability, and financial demands of shareholders. It is important that the recommendation made can be justified when pressed with these concerns.*

Timeline

According to OSHA PSM 1910.119(e)(5), along with EPA RMP 40 CFR §68.67(e):

'The employer (*owner or operator) shall establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.'²

*40 CFR §68.67 uses 'owner or operator' in place of 'employer.'

While an exact deadline is not provided with federal guidance, it is necessary to close recommendations in a timely manner in order to mitigate any deficiencies identified during the PHA study. It is important to note that some state and local agencies have defined further requirements related to PHA recommendations. For instance, the California Accidental Release Prevention (CalARP) Program includes the requirement that PHA recommendations be closed within 2.5 years of the conclusion of the study, or at next turnaround if required.¹

In This Issue

This Safety Bulletin provides an overview of PHA recommendation regulatory expectations.

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<https://www.NebulaSafety.com>

Responsibility

A responsible party should be assigned to each recommendation during the PHA study, or prior to the PHA report being published (when the recommendation is finalized and approved by management).

Assigning responsibility for recommendations helps to ensure all recommendations are tracked and completed accordingly. It is recommended to assign a specific individual to ensure clear delegation of ownership for recommendation closure.

Documentation and Tracking

Documentation of the recommendation allows for appropriate tracking of recommendations and the projects associated with them to ensure the timeline for completion is met.

Adequate documentation of the recommendation includes recording, updating, and communicating the status of each action, as well as identifying and resolving any issues or delays that may arise.

Track the implementation of recommendations and their effectiveness. Regularly review and update recommendations as needed, considering changes in the system or newly available information.

Regulations require that all PHA recommendations should have documented resolutions that are maintained for the life of the process. See 1910.119(e)(7) below.

‘Employers (*The owner or operator) shall retain process hazards analyses and updates or revalidations for each process covered by this section, as well as the documented resolution of recommendations described in paragraph (e)(5) of this section for the life of the process.’²

References:

1. [https://govt.westlaw.com/calregs/Document/I3AC266E0E06D11EEACF2EA870D59E268?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I3AC266E0E06D11EEACF2EA870D59E268?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))
2. <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.119>
3. <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-68>