



Oregon

Theodore R. Kulongoski, Governor

Department of Consumer and Business Services

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October 15, 2010

The purpose of this letter is to advise you that agricultural farm supply businesses having large quantities of anhydrous ammonia at their principal place of business(s) may fall under the rule requirements for Process Safety Management (PSM)1910.119. The threshold quantity for this rule to apply is 10,000 pounds or 1,943 gallons of anhydrous ammonia.

The PSM rule has a limited retail establishment exemption based on federal OSHA's conclusion that these facilities do not present the same degree of hazard to employees as other workplaces covered by the standard. When the standard was adopted, the discussion in the preamble stated that this decision was made because chemicals in retail facilities are in small volume packages making a large release unlikely. In the case of farm supply merchants, the anhydrous ammonia is frequently stored in large tanks rather than small volume containers making a release a more significant event. Oregon OSHA has determined that these facilities are not part of the retail exemption.

PSM is a complex standard with requirements intended to prevent or minimize the consequences of catastrophic releases of highly hazardous chemicals. The requirements include: employee participation, written process safety information, process hazard analysis, written operating procedures, employer responsibilities for contractors and contract employer responsibilities, pre-startup safety review, mechanical integrity of process equipment, hot work permit, written procedures to manage change, incident investigation, compliance audits, and trade secrets.

Appendix C in the rule lists guidelines and recommendations to help employers and employees comply with these requirements. For more information on the PSM rule, please go to our website at www.orosha.org

Oregon OSHA's consultation staff can assist you in determining whether you fall under the PSM standard and help you take steps to meet the above requirements and ensure the safety of your employees. Oregon OSHA consultative staff are available at the following locations:

Portland: 503-229-6193

Bend: 541-388-6068

Salem: 503-373-7819

Pendleton: 541-276-2353

Eugene: 541-686-7913

Medford: 541-776-6016

Sincerely,

Marilyn K. Schuster
Policy Manager