

Interrelationship of Elements.

Work together to identify the Process Safety Management elements that would apply to the following example. Be prepared to explain your decisions.

During a routine inspection of equipment, the maintenance worker discovers a valve that no longer meets the applicable code and must be changed. Because the type of valve is no longer made, a different type of valve must be selected and installed. The type of valve selected may mandate different steps for the operators who will require training and verification in the new procedures. The rationale for selecting the type of valve must be made available for review by employees and their representatives. When the new valve is installed by the supplier, it will involve shutting down part of the process. The employer must review the response plan to ensure that procedures are adequate for the installation hazards.

Although Management of Change provisions cover interim changes, after the new valve is in place the Process Safety Information will have to be updated before the Process Hazard Analysis is updated or revalidated, to account for potential hazards associated with the new equipment. Also, inspection and maintenance procedures and training will need to be updated.