PHA as a Tool for Incident Investigations and Management of Change

Dennis A. Hickman, CSP
INVISTA
Global PSM Capability Manager
Dennis.Hickman@invista.com

Abstract

Process Hazard Analyses (PHAs) are an integral part of a process safety management system and are required by OSHA’s PSM regulation 29 CFR 1910.119, and EPA’s Risk Management Program Rule per 40 CFR Part 68. For applicable processes, PHAs must be conducted for new and existing facilities, and the PHA must be revalidated at least every five years. The PHA must satisfy an additional requirement (among others) to identify and address previous incidents that have a potential process safety consequence. These same regulations also require that changes that may affect an existing covered process be managed to address the technical and safety aspects of the change. The regulations, however, do not specifically require a PHA for a change to a covered process.

Many facilities incorporate a review of changes (MOCs) and incidents that had occurred since the last PHA as part of the PHA revalidation process. This paper will discuss the use of the PHA as a tool for the incident investigation process and for the technical and safety evaluation process for MOCs.