

**BY ORDER OF THE COMMANDER
SPACE LAUNCH DELTA 45**

**SPACE LAUNCH DELTA 45
INSTRUCTION 91-203**

16 JUNE 2022

Safety

**PROCESS SAFETY
MANAGEMENT (PSM) PLAN**



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This instruction implements the requirements in Department of the Air Force Manual (DAFMAN) 91-203, *Air Force Occupational Safety, Fire and Health Standards*, Section 1.10. Instructions in Section 1.10 are derived from 29 Code of Federal Regulations (CFR) 1910.119, *Process Safety Management of Highly Hazardous Chemicals*, for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals. This instruction ensures an adequate PSM program is in place by implementing the required PSM elements of the Occupational Safety and Health Administration (OSHA) that are described in 29 CFR 1910.119 and Section 1.10 of DAFMAN 91-203. This publication applies to Space Launch Delta 45 (SLD 45) military members and civilian government employees. This instruction documents implementation of PSM employee participation and records management. Ensure that all records created as a result of processes prescribed in this publication are maintained in accordance with (IAW) Air Force Instruction (AFI) 33-322, *Records Management and Information Governance Program*, and disposed of IAW Air Force Records Information Management System (AFRIMS) Records Disposition Schedule (RDS). Refer recommended changes and questions about this publication to the Office of Primary Responsibility (OPR) using the AF Form 847, *Recommendation for Change of Publication*; route AF Forms 847 from the field through the appropriate functional chain of command. This publication may not be supplemented or further implemented/extended. Submit requests for waivers through the chain of command to the Publication OPR. The use of the name or mark of any specific manufacturer, commercial product, commodity, or service in this publication does not imply endorsement by the Air Force.

SUMMARY OF CHANGES

This publication has been revised and must be completely reviewed. Changes include updates to several of the organization references that were either redesignated or have been deactivated.

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1. Purpose. This instruction describes how SLD 45 and United States Air Force (USAF) and United States Space Force (USSF) tenant organizations shall comply with DAFMAN 91-203 regarding PSM covered chemicals, and it constitutes the SLD 45 PSM Compliance Implementation Plan.

1.1. Application.

1.1.1. This instruction is applicable to all SLD 45 organizations involved with PSM covered processes at Cape Canaveral Space Force Station (CCSFS) or Patrick Space Force Base (PSFB). Currently, there are no PSM covered processes at PSFB.

1.1.2. This instruction is not applicable to tenant organizations or commercial companies that have operational control over a PSM covered process. They are required by law (29 CFR 1910.119) to develop their own compliant PSM programs; however, if they have PSM covered processes at CCSFS or PSFB, they are encouraged under this instruction to have representation on the SLD 45 PSM Team.

1.1.3. SLD 45 Explosives Safety Office (SLD 45/SEW), has regulatory safety compliance responsibility for explosives and pyrotechnics materials at PSFB and CCSFS. They ensure compliance with the requirements in Section 1.10. of DAFMAN 91-203, regarding explosives and pyrotechnics by implementing the requirements in AFI 91-202, Chapter 9, *The US Air Force Mishap Prevention Program*, and Defense Explosives Safety Regulation (DESR) 6055.09_Air Force Manual (AFMAN) 91-201, *Explosives Safety Standards*. This includes routine explosive safety inspections to verify users of explosives and pyrotechnics are in compliance with locally developed Explosive Safety Plans derived from Department of Defense Explosives Safety Board Explosives Site Plans and Licenses.

1.1.4. **Attachment 2**, **Table A2.1**, contains a list of the PSM covered chemicals currently located at CCSFS. The list includes chemicals covered by the PSM regulation and those included in an 11 March 1996 memo from Headquarters, USAF, Safety (HQ, USAF/SE).

1.1.5. SLD 45 personnel requiring information, support or written PSM certification from booster, payload or range contractors, shall coordinate with and obtain the information through the responsible Program Office (i.e., 45th Civil Engineer Squadron (45 CES), 45th Contracting Squadron (45 CONS), 5th Space Launch Squadron (5 SLS)) or the applicable off-site System Program Office, and not directly from any contractor. The Program Office shall ensure proper PSM requirements and provisions are contained in each contract and should encourage contractors involve with covered processes to participate in SLD 45 PSM team activities.

2. Responsibilities.

2.1. Space Launch Delta 45 Safety (SLD 45/SE).

2.1.1. Serves as the lead organization for implementing the SLD 45 PSM program.

2.1.2. Manages the overall SLD 45 PSM program and chair PSM team activities.

2.1.3. Monitors and assist in the implementations of PSM programs for all SLD 45-owned PSM covered process areas.

2.1.4. Provides modeling of toxic dispersions and support other aspects of launch emergency response.

2.1.5. Manages the SLD 45 Pressure Vessels Mechanical Integrity program.

2.2. **PSM Team.** The SLD 45 PSM Team is comprised of at least one representative from SLD 45 Occupational Safety (SLD 45/SEG), SLD 45 Safety Analysis (SLD 45/SEA), 45 CES, 45th Operational Medical Readiness Squadron, Bioenvironmental Engineer Flight (45 OMRS/SGPB) and other USAF and USSF organizations having personnel with Access Levels II, III or IV as defined by [paragraph 2.6](#). The 45 CES representative provides team interface with the Hazardous Material Pharmacy, Environmental Management Office, Fire Emergency Services Flight and the Readiness Flight. Contractors and other government agencies that have operational control of a PSM covered process at CCSFS or PSFB are encouraged to provide SLD 45 PSM Team representatives as well.

2.2.1. Meets, as necessary, to coordinate SLD 45 PSM Plan implementation.

2.2.2. Determines each organization's Access Level as defined in [paragraph 2.6](#) and [Table 1](#).

2.2.3. Coordinates updates to SLD45I 91-203, *Process Safety Management Plan*.

2.2.4. Tracks status of PSM compliance discrepancies and reports status of open discrepancies in Environmental, Safety and Occupational Health Council briefings.

2.2.5. Determines if any chemical used at CCSFS or PSFB is covered under PSM.

2.2.6. Conducts annual audits of SLD 45 organizations' Access Level IV personnel and conducts triennial audits of SLD 45 organizations that have Access Level II/III personnel. Audits may be conducted by a single PSM team member or multiple PSM team members.

2.2.7. Maintains a PSM Data Repository. The PSM team shall maintain a current list of covered processes at CCSFS or PSFB that shows the location, responsible organization and contact information. SLD 45 organizations that have Access Level II/III/IV personnel will ensure these personnel have access to required PSM documentation that is stored in a central location accessible by their employees. The PSM team chair will maintain a directory of these locations in the PSM Data Repository to provide a single point of contact for outside agencies and/or auditors.

2.3. **5th Space Launch Squadron (5 SLS).** Implements requirements specified in [paragraph 2.7.3](#).

2.4. **45th Operational Medical Readiness Squadron, Bioenvironmental Engineering (45 OMRS/SGPB).**

2.4.1. Appoints a PSM representative to participate as a member of the PSM team.

2.4.2. Responsible for workforce and community health issues related to PSM.

2.4.3. Provides technical advice and support to the PSM team as requested such as reviewing Process Hazard Analyses (PHAs) to determine technical accuracy of the health effects and the technical viability of the recommendations for health control measures.

2.5. **45th Contracting Squadron (45 CONS).**

2.5.1. Assists in the development of standardized safety language to be placed in contracts for each area where PSM requirements apply.

2.5.2. Obtains PSM compliance letters from contractors who have management responsibilities for PSM-covered processes at CCSFS or PSFB. Such organizations are required to reissue their PSM compliance letters for each triennial PSM audit.

2.5.3. Provides contracting advice on PSM matters when requested by the PSM team.

2.6. 45th Civil Engineer Squadron (45 CES).

2.6.1. Appoints PSM representatives to participate as members of the PSM team.

2.6.2. Provides technical advice on possible fire effects of the failure of controls as outlined in 29 CFR 1910.119(e)(3).

2.6.3. Reviews PHAs as requested by the PSM team to determine the technical accuracy of fire effects, technical viability of recommendations for fire control measures and technical accuracy of recommendations for emergency response plans.

2.6.4. Provides technical advice on the fire hazards of process chemicals covered under the requirements of this instruction and 29 CFR 1910.119(d)(1).

2.6.5. Ensures the Fire Department maintains a Hot Work Permit (HWP) Program and ensures compliance to it by Level III/IV employees (defined by [paragraph 2.6](#)). Also ensures that the Fire Department reviews and approves HWP requests.

2.6.6. Participates in Emergency Planning functions as requested by the PSM team.

2.6.7. Ensures facility-related recommendations made through PHAs, incident investigations and PSM audits are implemented as funded.

2.7. **All SLD 45 Organizations.** Users of hazardous facilities/processes are divided into four groups that are defined by the level of access to PSM-covered processes and employee responsibilities. Based on these access levels, this PSM Plan determines which PSM elements SLD 45 organizations must comply with to ensure the safety of their employees. [Table 1](#) provides responsibilities for SLD 45 organizations based on the level of employee participation in PSM-covered processes/facilities.

2.7.1. Organizations having no access to facilities with PSM-covered processes – Access Level I (e.g., vendors and delivery companies under Air Force contract, 45th Comptroller Squadron (45 CPTS), 45th Force Support Squadron (45 FSS)) are not responsible for any of the PSM elements. However, organizations of this type (including providers of incidental services to areas outside the hazardous areas) should ensure employees can distinguish all work area emergency notification signals and know how to respond to each of them.

2.7.2. Organizations with personnel who have access to facilities with PSM-covered operations, but are not present during PSM-covered operations – Access Level II (e.g., SLD 45 Public Affairs (SLD 45/PA), Cape Civil Engineer Flight (45 CES/CEZ) and Environmental (45 CES/CEIE) shall:

2.7.2.1. Participate in the PSM team if personnel are involved with any PSM-covered process.

2.7.2.2. Ensure employees have been trained in emergency response and evacuation, and the hazards associated with covered processes when not in use.

- 2.7.2.3. Coordinate emergency response and evacuation plans with the operator of the facility.
- 2.7.3. Organizations with personnel present during PSM-covered operations as process observers – Access Level III (e.g., 5 SLS) shall:
 - 2.7.3.1. Appoint a PSM representative to participate as a member of the PSM team.
 - 2.7.3.2. Develop and implement written PSM plans for assigned facilities with PSM covered processes.
 - 2.7.3.3. Ensure employees can access PHAs and Process Safety Information (PSI) in a central location that is associated with PSM-covered processes in assigned facilities.
 - 2.7.3.4. Ensure employees are trained in emergency response and evacuation, and the hazards associated with covered processes when in use.
 - 2.7.3.5. Coordinate emergency response and evacuation plans with the operator of the facility.
- 2.7.4. Organizations operating, maintaining and testing PSM-covered operations – Access Level IV (**NOTE:** There are currently no SLD 45 organizations in this category) shall:
 - 2.7.4.1. Appoint a PSM representative to participate as a member of the PSM team.
 - 2.7.4.2. Develop OSHA-compliant PSM programs covering the covered processes per DAFMAN 91-203 and 29 CFR 1910.119.
 - 2.7.4.3. Coordinate emergency response and fire protection activity with Air Force organizations through the PSM team.
 - 2.7.4.4. Coordinate training of employees of Access Level II and III organizations through the PSM team.
 - 2.7.4.5. Provide up-to-date point of contact information for technical information and emergency response to the PSM team.

Table 1. Organization Responsibilities for PSM Elements.

Paragraph	29 CFR 1910.119()	PSM Element	Access Level I Employees have no access to covered process areas	Access Level II Employees have no access during covered process ops	Access Level III Employees are present during covered process ops as witnesses only	Access Level IV Employees operate, maintain or test covered processes
3.1	c	Employee Participation			X	X
3.2	d	Process Safety Information			Note 1	X
3.3	e	Process Hazard Analysis			Note 1	X
3.4	f	Operation Procedures			Note 1	X
3.5	g	Training			Note 2	X
3.6	h	Contractors				X
3.7	i	Pre-Startup Safety Review				X
3.8	j	Mechanical Integrity				X
3.9	k	Hot Work Permit			Note 3	Note 3
3.10	l	Management of Change				X
3.11	m	Incident Investigation			Note 4	X
3.12	n	Emergency Planning and Response		Note 5	Note 5	Note 5
3.13	o	Compliance Audits		Note 6	Note 6	Note 6
3.14	p	Trade Secrets				X

NOTE 1: Individuals review and become familiar with information for their own personal safety as part of training/emergency response (documented in AF Form 55, *Employee Safety and Health Record*).

NOTE 2: Required training can be done by SLD 45 units or the organization controlling the PSM covered process. SLD 45 units must maintain records of that training (AF Form 55 and/or a tracking database).

NOTE 3: Level III organizations may develop and implement work plans that require Hot Work Permits. All Hot Work Permits are approved by the Fire Emergencies Services Flight.

NOTE 4: Support investigations of PSM-related incidents that affect SLD 45 personnel or facilities.

NOTE 5: Level II/III organizations comply with the SLD 45 Installation Emergency Management Plan 10-2 (IEMP 10-2) and emergency plans of the organization controlling the PSM covered process. Fire Emergencies Services Flight coordinates on emergency planning and provides emergency response.

NOTE 6: Assist PSM team in performance of PSM audits as requested.

3. OSHA Compliance Guidelines. There are 14 different PSM elements defined by OSHA in 29 CFR 1910.119. The elements are listed below. [Attachment 3](#) contains a PSM audit checklist that should be considered for each applicable element of an organization's PSM plan, if one is required.

- 3.1. Employee Participation.
- 3.2. Process Safety Information.
- 3.3. Process Hazard Analysis.
- 3.4. Operating Procedures.
- 3.5. Training.
- 3.6. Contractors.
- 3.7. Pre-startup Safety Review.
- 3.8. Mechanical Integrity.
- 3.9. Hot Work Permits.
- 3.10. Management of Change.
- 3.11. Incident Investigation.

- 3.12. Emergency Planning and Response.
- 3.13. Compliance Audits.
- 3.14. Trade Secrets.

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Attachment 1**GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION*****References***

29 CFR 1910.119, 8 February 2013, *Process Safety Management of Highly Hazardous Chemicals*

AFI 91-202, *The US Air Force Mishap Prevention Program*, 10 March 2020

AFI 33-322, *Records Management and Information Governance Program*, 11 March 2020

DAFMAN 91-203, *Air Force Occupational Safety, Fire and Health Standards*, 25 March 2022

DESR 6055.09_AFMAN 91-201, *Explosives Safety Standards*, 28 May 2020

SLD 45 *Installation Emergency Management Plan 10-2 (IEMP 10-2)*, 5 January 2022

Compliance Program Letter (CPL) 2-2.45A, 13 September 1994, *OSHA Compliance Program Letter 2-2.45*, Appendix A, PSM Audit Guidelines

Adopted Forms

AF Form 55, *Employee Safety and Health Record*

AF Form 847, *Recommendation for Change of Publication*

Abbreviations and Acronyms

45 CES—45th Civil Engineer Squadron

45 CONS—45th Contracting Squadron

45 CPTS—45th Comptroller Squadron

45 OMRS—45th Operational Medical Readiness Squadron

5 SLS—5th Space Launch Squadron

AFI—Air Force Instruction

AFMAN—Air Force Manual

CCSFS—Cape Canaveral Space Force Station

CFR—Code of Federal Regulations

DAFMAN—Department of the Air Force Manual

DESR—Defense Explosives Safety Regulation

DPF—Defense Satellite Communications System Processing Facility

EPF—Eastern Processing Facility

FSA-1—Fuel Storage Area-1

HWP—Hot Work Permit

IAW—In Accordance With

LC—Launch Complex

OPR—Office of Primary Responsibility

OSHA—Occupational Safety and Health Administration

PSFB—Patrick Space Force Base

PSM—Process Safety Management

SLD 45—Space Launch Delta 45

SLD 45/PA—Space Launch Delta 45 Public Affairs

SLD 45/SE—Space Launch Delta 45 Safety

SLD 45/SEA—Space Launch Delta 45 Safety Analysis

SLD 45/SEG—Space Launch Delta 45 Occupational Safety

SLD 45/SEW—Space Launch Delta 45 Explosives Safety

USAF—United States Air Force

USSF—United States Space Force

Attachment 2

LIST OF PSM COVERED CHEMICALS

Table A2.1. PSM Covered Chemicals¹ in Use at CCSFS.

Covered Chemical	Chemical Abstracts Service	Threshold Quantity	CCSFS Sites With Covered Chemicals Exceeding Threshold Quantities
Ammonium Perchlorate (NH ₄ ClO ₄)	7790-98-9	7,500 lbs.	Receipt, Inspection and Storage building (open grain operations) ¹
Nitrogen Tetroxide (N ₂ O ₄)	10544-72-6	250 lbs. (20.7 gal)	DPF, EPF ² , FSA-1 ² , PPF, LC-37, LC-40, LC-41
Hydrazine (Anhydrous) ³ (N ₂ H ₄)	302-01-2	100 lbs. (11.9 gal)	DPF, EPF ² , PPF, LC-37, LC-40, LC-41, FSA-1 ²
Monomethyl Hydrazine (MMH)	60-34-4	100 lbs. (13.7 gal)	DPF, EPF ² , PPF, LC-37, LC-40, LC-41, FSA-1 ²
Liquid Hydrogen ⁴	1333-74-0	10,000 lbs. (16949gal)	LC-37, LC-41
NOTES:			
<p>1. Covered chemicals and processes shall be as described in the memo from HQ USAF/SE, dated 11 March 1996. All hypergolic fuels (in excess of threshold quantity) and open grain ammonium perchlorate, in addition to other chemicals on the OSHA covered list, are processes covered by the PSM regulation.</p> <p>2. FSA-1 and EPF are owned by National Aeronautics and Space Administration and Naval Reconnaissance Office respectively and operated by their respective contractors. On-site thresholds are provided here because these sites are located on Air Force property.</p> <p>3. Per memo from HQ USAF/SE dated 11 March 1996, threshold quantities for hypergolic fuels that are not on the OSHA list will be the same as for methyl hydrazine (100 pounds), thus, the threshold quantity for N₂H₄ is 100 pounds.</p> <p>4. Hydrogen is covered under 20 CFR 1910.119 (a)(ii), a process which involves a flammable liquid or gas on site in one location, in a quantity of 10,000 pounds (4535.9 kg) or more when not used solely for workplace consumption as a fuel.</p>			

Attachment 3

PSM ELEMENT CHECKLISTS

Figure A3.1. PSM Element Checklists.

The following checklists provide top-level guidance on what steps and/or information must be included for each element in a PSM program. Not all elements may be applicable to a given organization depending on the organization's involvement with the covered process. More detailed information on each element is contained in the OSHA Compliance Program Letter 2-2.45, Appendix A, "*PSM Audit Guidelines*".

A3.1. EMPLOYEE PARTICIPATION

- A3.1.1. Have employees been involved with the development and implementation of the unit PSM program?
- A3.1.2. Is there a written program/plan regarding employee participation?
- A3.1.3. Has the employee participation been documented?
- A3.1.4. Do employees have access to all PSM information?

A3.2. PROCESS SAFETY INFORMATION

- A3.2.1. Has written process safety information been compiled before conducting any PHAs?
- A3.2.2. Does the information include details of the:
 - A3.2.2.1. Hazards of the chemicals in the process (e.g., toxicity, reactivity, etc.)
 - A3.2.2.2. Technology of the process (e.g., flow diagrams, safe limits, etc.)
 - A3.2.2.3. Equipment in the process (e.g., materials, compliance with codes, etc.)
 - A3.2.2.4. Are Material Safety Data Sheets available to employees?

A3.3. PROCESS HAZARD ANALYSIS

- A3.3.1. For new processes, are initial PHAs prioritized and performed as soon as possible?
- A3.3.2. Are existing PHAs updated and revalidated at least every 5 years?
- A3.3.3. Is an appropriate methodology used to determine and evaluate the process hazards?
See 29 CFR 1910.119(e)(2) for guidance.
- A3.3.4. Does the PHA address all the items in 29 CFR 1910.119(e)(3)?
- A3.3.5. Does the PHA team include the following?
 - A3.3.5.1. At least one employee with specific experience and knowledge of the process.
 - A3.3.5.2. At least one employee knowledgeable in the PHA methodology used.
- A3.3.6. Is there an adequate system in place to resolve findings/recommendations in a timely manner?
- A3.3.7. Are PHAs, updates and corrective actions kept for the life of the process?
- A3.3.8. If not the process owner/operator:
 - A3.3.8.1. Do you have access to the PHAs?
 - A3.3.8.2. Do the PHAs provide adequate information to train your employees?

A3.4. OPERATING PROCEDURES

A3.4.1. Do written procedures exist for each covered process? A3.4.2. Do the procedures include?

A3.4.2.1. The entire process, including emergency shutdowns and startups?

A3.4.2.2. Operating limits?

A3.4.2.3. Safety and health considerations (hazards, controls, personal protective equipment, safety systems)?

A3.4.3. Are the procedures:

A3.4.3.1. Consistent with process safety information?

A3.4.3.2. Readily accessible to employees?

A3.4.3.3. Reviewed and updated on a regular basis?

A3.4.4. Have safe work practices (Lockout/Tag out, Confined Space Entry) been implemented?

A3.5. TRAINING

A3.5.1. Do training records exist for both initial and refresher training?

A3.5.2. Is initial training completed prior to the employee's participation in the covered process?

A3.5.3. Is the level of training appropriate for the employee's role (witness vs. operator vs. maintenance)?

A3.5.4. Is the frequency of refresher training adequate? Is it at least once every 3 years? Were the employees involved in the process consulted?

A3.5.5. Are contractors and/or visitors included in the training?

A3.6. CONTRACTOR

A3.6.1. Are support contractor employees informed of potential hazards present on CCSFS due to PSM-covered processes?

A3.6.2. Do support contractors provide adequate PSM training to their employees?

A3.7. PRE-STARTUP SAFETY REVIEWS

A3.7.1. For any new or modified facilities affecting PSM information:

A3.7.1.1. Has a pre-startup safety review been conducted?

A3.7.1.2. Are safety, operations and maintenance, and emergency procedures in place and adequate prior to startup?

A3.7.1.3. Has a PHA been performed and recommendations resolved prior to startup?

A3.8. MECHANICAL INTEGRITY

A3.8.1. Is there a written mechanical integrity program for covered process equipment?

A3.8.2. Are there adequate procedures for maintenance, inspection and testing of process equipment?

A3.8.3. Has adequate training been provided to employees maintaining process equipment?

A3.8.4. Are inspection and test results properly documented?

A3.8.5. Are deficiencies tracked and corrected in a timely manner?

A3.8.6. Are new equipment, spare parts and maintenance materials suitable for use in the covered process?

A3.9. HOT WORK PERMITS

A3.9.1. Are all hot work operations approved by the CCSFS Fire Department via a hot work permit?

A3.9.2. Do all hot work operations comply with the base Hot Work Program requirements?

A3.10. MANAGEMENT OF CHANGE

A3.10.1. Are there written procedures for managing changes to covered processes?

A3.10.2. Do these procedures:

A3.10.2.1. Assure impacts to safety and health are adequately reviewed and resolved?

A3.10.2.2. Assure operating procedures are properly updated?

A3.10.3. Are employees involved in the process informed of the change and properly trained prior to startup?

A3.10.4. Has all process safety information affected by the change been updated?

A3.11. INCIDENT INVESTIGATION

A3.11.1. Has each incident resulting in an actual or potential catastrophic release been investigated?

A3.11.2. Are investigations initiated within 48 hours?

A3.11.3. Do investigation teams contain the proper membership? (One person knowledgeable in the process involved and one person knowledgeable in incident investigations.)

A3.11.4. Is there a system developed to resolve and document findings and recommendations?

A3.11.5. Are investigation reports properly reviewed and approved? Are they kept for 5 years?

A3.12. EMERGENCY PLANNING AND RESPONSE

A3.12.1. Has an emergency action plan been established for your process/facility? Has it been coordinated with and is it compatible with the overall SLD 45 Installation Emergency Management Plan 10-2?

A3.12.2. Does the plan include procedures for small releases?

A3.12.3. Are there a sufficient number of people designated and trained to assist in safe and orderly evacuation?

A3.12.4. Are there adequate alarm systems in place?

A3.12.5. Is the plan reviewed with each employee covered by the plan? Is it reviewed both initially and when changed?

A3.13. COMPLIANCE AUDITS

A3.13.1. Are PSM compliance audits conducted at least every 3 years?

A3.13.2. Are the results documented and reported to both unit commanders and the PSM Team?

A3.13.3. Are findings formally tracked and closed out in a timely manner? A3.13.4. Are audits conducted by people knowledgeable in the process?

A3.13.5. Have you, or the PSM Team, retained the two most recent audit reports?

A3.14. TRADE SECRETS

A3.14.1. Has all necessary information been provided to those individuals responsible for the above elements without regard to possible trade secret issues?

A3.14.2. Do employees and their designated representatives have access to trade secret information contained in the PHA and other documents required by the PSM standard?

A3.14.3. Have all trade secret issues been worked through the appropriate contract management office?