

U. S. Chemical Safety and Hazard Investigation Board RECOMMENDATION STATUS CHANGE SUMMARY

Report:	Remote Isolation of Process Equipment
Recommendation Number:	2024-01-H-R3
Date Issued:	July 25, 2024
Recipient:	Occupational Safety and Health Administration (OSHA)
New Status:	Open – Awaiting Response or Evaluation/Approval of
	Response
Date of Status Change:	Not Applicable – Initial Status

Recommendation Text:

Update the Process Safety Management (PSM) standard by expanding the Process Hazard Analysis (PHA) requirements under 29 CFR 1910.119(e)(3) to include an evaluation of the need for remote isolation devices for major process equipment that can be remotely activated from a safe location or automatically activated during a release.

Board Status Change Decision:

A. Rationale for Recommendation

The U.S. Chemical Safety and Hazard Investigation Board (CSB) has reviewed and investigated numerous incidents where the consequences escalated following a loss of containment due to the lack of effective remote isolation equipment. These incidents resulted in serious injuries, fatalities, environmental contamination, and severe damage to facilities.

Following the 2019 incident at the TPC Group chemical plant in Port Neches, TX, the CSB concluded that improved requirements for remote isolation are necessary. The CSB initiated this Safety Study to review the incidents investigated by the CSB and determine the action needed to address deficiencies in both industry guidance and federal regulations.

The CSB found that although guidance has been available for many years, it has not been consistently followed. The CSB concluded that stronger remote isolation requirements are needed. As a result of these findings, the CSB issued one recommendation to the Occupational Safety and Health Administration (OSHA). This status change summary addresses CSB Recommendation No. 2024-01-H-R3.