

RMP and PSM Changes

A&WMA Midwest 2023 Technical Conference

Paul Jacobson



SpencerFane

Here we go again.



What Is In the Proposed RMP Rule?

- Natural Hazards, Power Loss, Climate Change
- Facility Siting
- Safer Technologies and Alternatives Analysis (STAA)
- Root Cause Analysis
- Third-Party Compliance Auditing
- Employee Participation
- Emergency Response
- Information Availability

Changes OSHA Is Considering

- No Proposed Rule Yet
- 8 Scoping Changes
- 16 Specific Textual Changes

Questions?

pjacobson@spencerfane.com