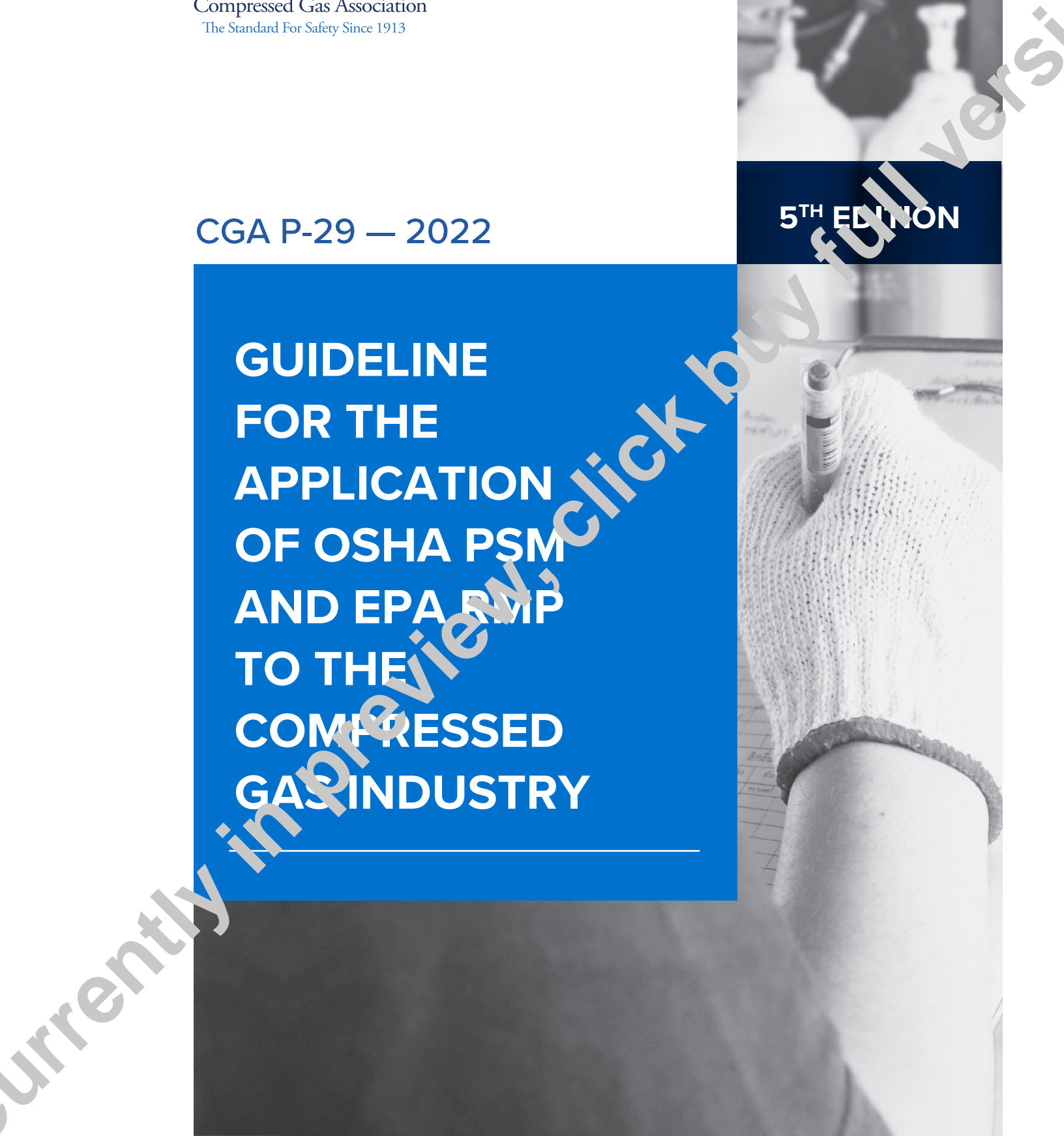


CGA P-29 — 2022

5<sup>TH</sup> EDITION

**GUIDELINE  
FOR THE  
APPLICATION  
OF OSHA PSM  
AND EPA RMP  
TO THE  
COMPRESSED  
GAS INDUSTRY**

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Work Item 16-026  
Process Safety Committee

NOTE—Technical changes from the previous edition are underlined

NOTE—Appendix A (Informative) is for information only.

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## 1 Introduction

The U.S. Occupational Safety and Health Administration (OSHA) Process Safety Management (PSM) standard and the U.S. Environmental Protection Agency (EPA) Risk Management Program (RMP) rule require that some U.S. industrial gas facilities comply with these regulations. For the purpose of this publication, the OSHA PSM standard refers to Title 29 of the U.S. *Code of Federal Regulations* (29 CFR) Part 1910.119, “Process Safety Management of Highly Hazardous Chemicals”, and the EPA RMP rule refers to Title 40 of the U.S. *Code of Federal Regulations* (40 CFR) Part 68, “Chemical Accident Prevention Provisions” [1, 2].<sup>1</sup>

## 2 Scope

This publication defines the criteria that may be applied to industrial gas facilities to evaluate the scope and extent of application of the PSM standard and the RMP rule. This guidance document also:

- explains how the PSM standard and the RMP rule apply to processes commonly found in the gas industry;
- defines criteria that can be used to determine if a process is covered by the PSM standard or the RMP rule;
- establishes a basis for determining reasonable boundaries of covered processes;
- explains the major differences between the PSM standard and the RMP rule; and
- explains the exemptions allowed under each regulation.

## 3 Definitions

### 3.1 Publication terminology

#### 3.1.1 Shall

Indicates that the procedure is mandatory. It is used wherever the criterion for conformance to specific recommendations allows no deviation.

#### 3.1.2 Should

Indicates that a procedure is recommended.

#### 3.1.3 May

Indicates that the procedure is optional.

#### 3.1.4 Will

Is used only to indicate the future, not a degree of requirement.

#### 3.1.5 Can

Indicates a possibility or ability.

### 3.2 Technical definitions

#### 3.2.1 Cargo tank motor vehicle (CTMV)

Vehicle that has a vessel mounted on it used to store liquids or gases while they are carried over public roadways.

NOTE—A CTMV is considered a transportation container or delivery vehicle under the EPA RMP rule.

#### 3.2.2 Covered process

Process regulated by the OSHA PSM standard, 29 CFR 1910.119, or the EPA RMP rule, 40 CFR Part 68 [1, 2].

#### 3.2.3 DOT container

Container (CTMV, cylinder, or drum) used to transport hazardous materials over public roadways whose design, use, and maintenance are regulated by DOT.

<sup>1</sup> References are shown by bracketed numbers and are listed in order of appearance in the reference section.