

**PROCESS SAFETY MANAGEMENT OF HIGHLY HAZARDOUS CHEMICALS
STANDARD (29 CFR 1910.119 AND 29 CFR 1926.64)**

OMB Control Number: 1218-0200

OMB Expiration Date: May 31, 2026

**SUPPORTING STATEMENT FOR
THE INFORMATION COLLECTION REQUIREMENTS IN THE
PROCESS SAFETY MANAGEMENT OF HIGHLY HAZARDOUS CHEMICALS
STANDARD (29 CFR 1910.119 AND 29 CFR 1926.64)⁶
OFFICE OF MANAGEMENT AND BUDGET
(OMB) CONTROL NUMBER 1218-0200
(January 2026)**

The agency is seeking an extension of the currently approved data collection.

A. JUSTIFICATION

1. Explain the circumstances that make the collections of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The main objective of the Occupational Safety and Health Act of 1970 (i.e., “the Act”) is to “assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources” (29 U.S.C. 651). To achieve this objective, the Act authorizes “the development and promulgation of occupational safety and health standards” (29 U.S.C. 651).

With regard to recordkeeping, the Act specifies that “[e]ach employer shall make, keep and preserve, and make available to the Secretary . . . such records . . . as the Secretary . . . may prescribe by regulation as necessary or appropriate for the enforcement of this Act . . .” (29 U.S.C. 657). The Act states further that “[t]he Secretary . . . shall prescribe such rules and regulations as he may deem necessary to carry out their responsibilities under this Act, including rules and regulations dealing with the inspection of an employer’s establishment” (29 U.S.C. 657).

The Clean Air Act Amendments (“CAAA”) of 1990 required the Occupational Safety and Health Administration (“OSHA” or “the agency”) to develop a standard on Process Safety Management of Highly Hazardous Chemicals (“the PSM Standard” or “the Standard”) containing certain minimum requirements to prevent accidental releases of chemicals that could pose a threat to workers. Under the authority granted by the Act, OSHA published the PSM Standard at 29 CFR 1740.119. The Standard, rather than setting specific engineering requirements, emphasizes the application of documented management controls; using the controls, companies address the risk associated with handling or working near highly hazardous chemicals. The Standard contains a number of collection of information requirements such as developing written process safety

⁶ The purpose of this Supporting Statement is to analyze and describe the burden hours and costs associated with provisions of this standard that contain paperwork requirements; this Supporting Statement does not provide information or guidance on how to comply with, or how to enforce, these provisions. Section 29 CFR 1926.64 is identical to 29 CFR 1740.119; the collections of information are approved under OMB control number 1218-0200.

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information, procedures and management practices; updating operating procedures and safe work practices; evaluating safety history and policies of contractors; conducting periodic evaluations; and documenting worker training. Items 2 and 12 below describe in detail the specific information collection requirements of the Standard.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The collections of information in the PSM Standard are necessary for implementing the requirements of the Standard. The information is used by employers to ensure that processes using highly hazardous chemicals with the potential for a catastrophic release are operated as safely as possible. The employer must thoroughly consider all facets of a process, as well as the involvement of workers in that process. Employers analyze processes so that they can identify, evaluate, and control problems that could lead to a major release, fire, or explosion. The Standard specifies several paperwork requirements. The purpose of these requirements is to ensure that employers collect the information necessary to control and reduce injuries and fatalities in workplaces that have the potential for highly hazardous chemical catastrophes. The following sections describe in detail the collection of information requirements in the Standard.

(A) Employee Participation (paragraphs (c)(1) – (c)(3)). Employers are required by paragraph (c)(1) to develop a written plan of action regarding the implementation of the employee participation required by this paragraph. Paragraph (c)(2) requires employers to consult with workers and their representatives on the conduct and development of process hazard analyses and on the development of the other elements of process safety management in the Standard. Under paragraph (c)(3) employers must provide access to process hazard analyses and other information to workers and their representatives.⁷

(B) Process Safety Information (paragraph (d)). Paragraph (d) requires employers to complete a compilation of written process safety information prior to conducting a process hazard analysis. The compilation of written process safety information, which includes information on the hazards of chemicals, the technology of the process, and the equipment, is to enable the employer and workers involved in operating the process to identify and understand the hazards posed by processes involving highly hazardous chemicals.

(C) Process Hazard Analysis (paragraph (e)(1)). Paragraph (e)(1) requires the employer to perform an initial process hazard analysis on processes covered by the Standard. The evaluation must be appropriate to the complexity of the process and must identify, evaluate, and control the hazards involved in the process.

⁷ In the 1999 Information Collection Request (ICR), OSHA indicated that the on-going burden of worker participation required by paragraph(c) is included in other elements of the Standard and, therefore, no burden hours were assigned to this paragraph. Comments to the ICR concurred with the agency's assessment regarding this burden.

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(D) Resolution of Hazards (paragraph (e)(5)). Paragraph (e)(5) requires documentation of the actions the employer takes to resolve the findings and recommendations of the team that performed the process hazard analysis, including a schedule for completing these actions. In addition, the employer is to communicate this information to affected operating, maintenance, and other workers whose work assignments are in the process.

(E) Updating, Revalidating, and Retaining the Process Hazard Analysis (paragraphs (e)(6) and (e)(7)). Paragraph (e)(6) requires that the initial process hazard analysis be updated and revalidated by a team at least every five years. Paragraph (e)(7) requires the employer to retain process hazard analyses for the life of each process covered by this section, as well as the documented resolution of recommendations described in paragraph (e)(5).

(F) Operating Procedures (paragraphs (f)(1) - (f)(4)). Paragraph (f)(1) requires the employer to develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information. Paragraph (f)(2) requires the employer to make the operating procedures readily accessible to workers who work in or maintain a process. Paragraph (f)(3) requires the employer to review the operating procedures as often as necessary to assure that they reflect current operating practice, and that the employer certify annually that these operating procedures are current and accurate. Paragraph (f)(4) requires the employer to develop and implement safe work practices that provide for the control of hazards during operations such as lockout/tagout; confined-space entry; opening process equipment or piping; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel. These safe practices apply to both the employer's workers and contractor workers.

(G) Training (Initial, Refresher, and Documentation) (paragraphs (g)(1) - (g)(3)). Paragraph (g)(1) requires employers to train workers presently involved in operating a process before they become involved in operating a newly assigned process. The training shall emphasize specific safety and health hazards; emergency operations, including shutdown; and safe work practices applicable to the worker's job tasks. Paragraph (g)(2) requires that the employer provide refresher training at least every three years, and more often if necessary.⁸ Paragraph (g)(3) requires the employer to prepare a record that contains the name of worker, the date of training, and the means used to verify that the worker understood the training.

(H) Contractors (paragraphs (h)(2)(i) - (h)(2)(iv), (h)(2)(vi), (h)(3)(iii), and (h)(3)(v)). This paragraph imposes collections of information on both employers and on contractors. Paragraph (h)(2)(i) requires employers, when selecting a contractor, to obtain and evaluate information regarding the contract employer's safety performance and programs. Paragraph (h)(2)(ii) requires that the employer inform contract employers of known potential fire, explosion, or toxic release hazards related to the contractor's work and the process. Paragraph (h)(2)(iii)

⁸ The training requirements in paragraphs (g)(1) and (g)(2), as well as the training requirements in paragraphs (h)(3)(i) and (h)(3)(ii), (j)(3), and (l)(3) are not considered collection of information requirements and therefore are not included in burden-hour and cost estimates described in Item 12.

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requires that the employer explain to contract employers the applicable provisions of the emergency action plan required by paragraph (n) of the Standard. Paragraph (h)(2)(iv) requires the employer to develop and implement safe work practices consistent with paragraph (f)(4) to control the entrance, presence and exit of contract employers and contract workers in covered process areas.⁹ Paragraph (h)(2)(vi) requires the employer to maintain a contract worker injury and illness log related to the contractor's work in process areas. Paragraph (h)(3)(iii) requires the contract employer to document: that contract workers have been trained to perform their work practices safely and are knowledgeable about the fire, explosion, and toxic hazards in the workplace; and the identity of the contract worker who received the training, the date of training, and the means used to verify that the worker understood the training.¹⁰ Paragraph (h)(3)(v) requires the contractor to advise the employer of any unique hazard presented by the contract employer's work, or any hazards found by the contract employer's work

(I) Written Procedures, Inspections, and Testing (paragraphs (j)(2) and (j)(4)(iv)).

Paragraph (j)(2) requires the employer to establish written procedures to maintain the on-going integrity of process equipment. Paragraph (j)(4)(iv) requires that employers document inspections and tests performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

(J) Hot Work Permit (paragraph (k)(2)). Paragraph (k)(2) requires the employer to provide the following information on permits issued for hot work operations conducted on or near a covered process: the date(s) authorized for hot work, the identity of the object on which hot work is to be performed, and documentation that the appropriate fire protection and prevention plans have been implemented. The permit must be kept on file until completion of the hot work operations.

(K) Management of Change (paragraphs (l)(1), (l)(4), and (l)(5)). Paragraph (l)(1) requires the employer to establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and for changes to facilities that affect a covered process. Paragraph (l)(4) requires the employer to update the procedures and practices set forth in paragraph (d) of the Standard if a change in paragraph (l) results in a change to the process safety information. Similarly, paragraph (l)(5) requires the employer to update the relevant information in paragraph (f) of the Standard if a change in paragraph (l) results in a change to the operating procedures and practices.

(L) Incident Investigation (paragraphs (m)(4)–(m)(7)). Paragraph (m)(4) requires that a report be prepared at the conclusion of any incident investigation, and that the report

⁹ The burden-hour and cost estimates associated with paragraph (h)(2)(iv) are included in the estimates for paragraph (f) in Item 12.

¹⁰ In Item 12, OSHA is accounting for the training documentation requirements for contract employers specified by paragraph (h)(3)(iii) under the training documentation provision of paragraph (g)(3).

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include, at a minimum, the date of the incident; the date the investigation began; a description of the incident; the factors that contributed to the incident; and any recommendations resulting from the investigation. Paragraph (m)(5) specifies that the employer must document resolutions and corrective measures taken with regard to the findings and recommendations provided in an incident investigation report. Paragraph (m)(6) states that the employer must allow affected personnel (including contract workers), whose job tasks are relevant to the incident findings, to review the report. Paragraph (m)(7) requires that incident investigation reports be retained for five years.

(M) Emergency Planning and Response (paragraph (n)). Paragraph (n) requires the employer to establish and implement an emergency action plan in accordance with the provisions of 29 CFR 1740.38(a). In addition, the emergency action plan shall include procedures for handling small releases.

(N) Compliance Audits (paragraphs (o)(1) and (o)(3) – (o)(5)). Under paragraph (o) (1), employers are required to certify that they have evaluated compliance with the provisions of this section at least every three years to ensure that the procedures and practices developed under the Standard are adequate and are being followed. Paragraph (o)(3) requires that a report of the audit findings be developed, while paragraph (o)(4) states that the employer must promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that the deficiencies have been corrected. Paragraph (o)(5) requires that the last two reports be retained.

(O) Trade Secrets (paragraphs (p)(1) – (p)(3)). Under paragraph (p)(1), employers are required to make all information necessary to comply with the Standard available to those persons responsible for compiling the process safety information (required by paragraph (d) of the Standard), those assisting in the development of the process hazard analysis (required by paragraph (e) of the Standard), those responsible for developing the operating procedures (required by paragraph (f) of the Standard), and those involved in incident investigations (required by paragraph (m) of the Standard), emergency planning and response (paragraph (n) of the Standard) and compliance audits (paragraph (o) of the Standard) without regard to possible trade secret status of such information. The burden hours and costs for providing workers with access to these categories of information are included in the estimates for paragraphs (d), (e)(5), (f)(2), (m)(6), (n) and (o).

Paragraph (p)(2) indicates that employers may require the persons to whom the information is made available under paragraph (p)(1) of this section to enter into confidentiality agreements not to disclose the information as set forth in 29 CFR 1740.1200, the Hazard Communication Standard (HCS). Last, paragraph (p)(3) requires, subject to the rules and procedures set forth in 29 CFR 1910.1200(i)(1) through 1910.1200(i)(12), employees and their designated representatives to have access to trade secret information contained within the process hazard analysis and other documents required to be developed by this standard. The burden hours and costs for employers' responses to requests from workers and their representatives for trade secret

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information are included in the HCS ICR, OMB Control No. 1218-0072.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Employers may use automated, electronic, mechanical, or other technological information collection techniques, or other forms of information technology (e.g., electronic submission of responses), when establishing and maintaining the required records. The agency wrote the paperwork requirements of the Standard in performance-oriented language (i.e., in terms of what data to collect, not how to record the data).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item A.2 above.

Section 304 of the CAAA required that the Secretary of Labor and the Administrator of the Environmental Protection Agency (EPA) promulgate a chemical process safety standard to prevent accidental releases of chemicals that could pose a threat to workers, including development of a list of highly hazardous chemicals that include toxic, flammable, highly reactive and explosive substances. The CAAA also specified the minimum elements to be covered by the Standard.

Some information developed under OSHA's Hazard Communication Standard duplicates the requirements in the PSM Standard. However, OSHA will accept the information collected under the Hazard Communication Standard, or similar information developed in response to the requirements of other agencies, provided it fulfills the requirements of the PSM Standard.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Small firms account for approximately 10 percent of the total costs of the PSM Standard. OSHA specifically addressed small business concerns in the Standard. For example, a small business might control its on-site inventory of highly hazardous chemicals by ordering more frequent, smaller shipments so that they do not exceed the threshold for coverage specified in the Standard. Also, they may segregate their inventory by dispersing storage around the worksite so that the release of a highly hazardous chemical from one storage area would not cause the release of other hazardous chemicals stored on site. Moreover, small employers who use several batch processes may be able to use a generic approach to process hazard analysis to further reduce the estimated cost of compliance. For example, a generic process hazard analysis may be used if a representative chemical process can be documented for the range of batch processes involved.

6. Describe the consequence to Federal program or policy activities if the collection is not

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conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

The agency believes that the information collection frequencies required by the Standard are the minimum frequencies necessary to effectively regulate process safety management of highly hazardous chemicals and, thereby, to fulfill its mandate “to assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources” as specified by the Act at 29 U.S.C. 651. The Standard also directly carries out the explicit requirements of the CAAA.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentially to the extent permitted by law.**

Paragraph (e)(6) requires that the initial process hazard analysis be updated and revalidated by a team at least every five years. The agency believes that this five-year update and revalidation interval is a reasonable timeframe, particularly in consideration of the long-life span, without change, of many processes. Paragraph (e)(7) requires the employer to retain process hazard analyses for the life of each process covered by this section, as well as the documented resolution

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of recommendations described in paragraph (e)(5). The agency does not believe that this requirement poses an undue burden on employers in that retention of these documents is necessary to conduct the periodic updates and revalidations which are required under the Standard.

Paragraph (m)(7) requires that incident investigation reports be retained for five years. The agency believes it is extremely useful if the incident report findings and recommendations are reviewed during the subsequent update or revalidation of the process hazard analysis. Consequently, the agency believes a five-year retention period is appropriate, to be consistent with paragraph (e) of the Standard, which requires the process hazard analysis to be updated or revalidated every five years.

Under paragraph (o)(1), employers are required to certify that they have evaluated compliance with the provisions of this section at least every three years to ensure that the procedures and practices developed under the Standard are adequate and are being followed. Paragraph (o)(5) requires that the last two reports be retained. OSHA believes that an audit with respect to compliance with the provisions contained in this section is an extremely important function. This is because it serves as a self-evaluation for employers to measure the effectiveness of their process safety management system. The audit can identify problem areas and assist employers in directing attention to process safety management weaknesses. The agency believes that it is necessary that audits be performed at least every three years in order to measure the effectiveness of the process safety management system. Paragraph (o)(5) requires employers to retain the two most recent compliance audit reports, as well as the documented actions described in paragraph (o)(4). The purpose of this -provision is to focus on any continuing areas of concern that are identified through the compliance audits.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years--even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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As required by the Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the *Federal Register* on January 30, 2023 (88 FR 5923) soliciting comments on its proposal to extend the Office of Management and Budget's approval of the information collection requirements specified by the Process Safety Management of Highly Hazardous Chemicals Standard (29 CFR 1910.119, 29 CFR 1926.64) (PSM) under docket number OSHA-2012-0039. This notice was part of a preclearance consultation program that provides the general public and government agencies with an opportunity to comment.

OSHA received a comment from Rebecca O'Donnell, Associate Director of Process Safety and Occupational Health at the American Chemistry Council (ACC) under docket number ID OSHA-2012-0039-0018 in response to this notice. The commenter had concerns about the burden estimates in the paperwork package.

First, the commenter states that it is inappropriate to equate the number of RMP establishments in the RMP database as equivalent to the number of respondents for PSM primarily because the threshold quantities for PSM are significantly lower than the threshold quantities for RMP. Based on this concern, ACC would like OSHA to utilize additional data sources to develop a more accurate estimate of respondents. The agency thanks the ACC for their comment on the number of effected entities and acknowledges that additional data could improve accuracy. In this supporting statement, OSHA uses the EPA's Risk Management Program (RMP) database to estimate the number of establishments, employees, and processes that must comply with the paperwork requirements of the PSM Standard. OSHA considers RMP data to be the best available data for this purpose. However, OSHA applies numerous assumptions and adjustments to the RMP data to make it more representative for the purpose of this PSM ICR and is only aware of the RMP data as the closest and most comprehensive source. While OSHA agrees that more data would be beneficial, the agency will continue to use RMP data as the primary basis for estimating burdens and will remain mindful of ACC's concerns when evaluating future improvements.

Secondly, the commenter states that the PSM standard represents a significant, if necessary, burden on affected entities. In an effort to inform OSHA's cost and burden estimates for both this ICR and any future rulemakings, ACC surveyed their members to better understand the burden to comply with the PSM standard. ACC chose to focus the survey entirely on the time and cost to conduct a Process Hazard Analysis (PHA). Overall, 18 ACC member companies responded to the survey, representing a total of 192 facilities with covered processes present. The companies indicated that between 3 and 60 PHAs are conducted on an annual basis, with an average of ~26 PHAs. ACC reports that the survey indicated:

- For the least complex processes, a PHA may take anywhere between half a day to 14 days (average 4.3 days; median 4 days).
- For the most complex processes, members report anywhere between 3 and 180 days (average 32.2 days, median 19 days) to conduct the PHA.

Additionally, the companies surveyed reported spending an average of 32 hours and 104 hours on the least and most complex processes, respectively, preparing the documentation necessary to conduct the PHA. This time included reviewing the previous PHAs, gathering and compiling documentation and drawings, reviewing process changes and incidents, reviewing and verifying previous action item closure, and reviewing applicable recognized and generally accepted good engineering practices (RAGAGEP) for updates.

The agency thanks ACC for their comments on the burden hour estimates associated with this information

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collection. The methodology for estimating the labor time burden in the PSM ICR was derived from the final industry profile. OSHA's estimates are based on data and assumptions developed as part of the standard's Final Economic Analysis, which is part of the rulemaking record. These burden estimates are intended to reflect average compliance time across all affected entities, recognizing that actual burdens may vary depending on organization size, complexity, and industry-specific factors. The data used in the cost analysis of the final PSM rule was carefully evaluated and considered when implementing the standard. For example, OSHA estimates that conducting a PHA for a new facility requires approximately 100 hours each for an engineer and a blue-collar supervisor, and 36 hours for two production workers (these numbers decrease for lower complexity processes). OSHA also accounts for the time to resolve PHA recommendations, which may not have been included in ACC's survey, estimating an additional 22 hours. For PHA revalidations, OSHA estimates are further reduced, showing 50 hours of an engineer's time. OSHA acknowledges that these estimates differ from some of ACC's survey responses. For instance, at least one respondent reported 180 days (presumably 1,440 hours, 8 hours per day) for a single PHA. At least one survey response also indicated that as many as nine people may participate, whereas OSHA estimates reflect involvement of up to four individuals. These disparities reflect the wide range of facilities and processes covered by the PSM standard. OSHA's estimates provide generalized averages across the regulated community, while ACC's survey data may not represent the total regulated population. Without direct review of the underlying survey data, OSHA is not willing to alter its existing estimates in the PSM ICR. However, OSHA appreciates the information provided and will take these examples under advisement when considering burden hour estimates in future PSM rulemaking.

9. Explain any decision to provide any payments or gift to respondents, other than remuneration of contractors or grantees.

The agency will not provide payments or gifts to the respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Paragraph (p)(1) of the Standard states that employers must provide the specified information to individuals involved in meeting the paperwork requirements of the Standard. To protect the confidentiality of this information, OSHA incorporated the disclosure procedures in the Hazard Communication Standard at 29 CFR 1740.1200(i)(1) through (i)(12), into paragraph (p)(2) of the Standard.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

None of the provisions in the Standard require sensitive information.

12. Provide estimates of the hour burden of the collection of information. The statement should:

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- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates.**
- **Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

Respondent Burden-Hour and Cost Determinations

OSHA uses the EPA's Risk Management Program (RMP) database to estimate the number of establishments, employees, and processes¹¹ that must comply with the paperwork requirements of the PSM Standard. All establishments in certain industries (chemical manufacturers, for example) are required by the RMP to report information about their chemical inventories and risk management plans to EPA. In addition, any establishment with chemical inventories that meet or exceed EPA's RMP threshold quantities (for chemicals and flammables) must also supply information. The required information is extensive and includes whether a process is covered by OSHA's PSM Standard; the establishment's North American Industry Classification System (NAICS); number of full-time workers; and the chemical(s) or flammable(s) on site that are covered by EPA's standard. The RMP final standard had a list of 77 chemicals and explosives, and more than 60 flammable substances that were covered, although regulation of flammables and explosives was later revised.

There is considerable overlap between facilities under the scope of the PSM standard and RMP, as many of the requirements are identical. Most of the facilities that fall under both the RMP and the PSM standard are RMP Program 3 facilities¹². Hence, for purposes of counting paperwork burden,

¹¹ A process for RMP is "Any activity involving a regulated substance, including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. For the purpose of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process" (EPA RMP general documentation, Chap. 1). A single establishment can have multiple processes.

¹² <https://www.osha.gov/chemical-executive-order/psm-terminology>

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the agency concludes that RMP data provides a baseline estimate of many establishments covered by the PSM Standard which can be adjusted as explained below.

There were approximately 11,329 establishments in the RMP database as of March 2025, which represents a decrease from the 11,641 establishments in the March 2022 RMP data (as reported in the previous ICR) of 2.7%, or 312 facilities.

Three states--California, Delaware, and New Jersey--have regulations with similar requirements to PSM. These regulations pre-date PSM. Because facilities in these states were already complying with PSM requirements, they were not included in the Regulatory Impact Analysis accompanying OSHA's final PSM Standard and consequently are not included here. The current RMP database has 848 sites in these three states. All numbers presented here (other than the 11,329 overall totals in the database) do not include these sites. Taking out these 848 sites leaves 10,481 sites potentially covered under the PSM rule in the dataset. RMP categorizes facilities generally, and processes in particular, fall into 3 categories: Program 1 being the smallest risk and the fewest requirements, Program 2 is intermediate, and Program 3 is the riskiest with the strictest requirements. Program 3 facilities are explicitly covered under PSM. There are (excluding the above 3 states) 656 Program 1 establishments, 3,797 Program 2 establishments and 6,028 Program 3 establishments. The associated number of Program 3 processes (excluding the 3 states) 8,885.¹³ OSHA's internal technical staff has estimated that PSM covers some establishments that are not included in the RMP data, that should be included in this cost analysis. The estimates are mostly based on adding an extra percentage of the RMP data to the final number of PSM facilities, the RMP data being the best base with which to extrapolate the number of extra facilities.

- The first group is for facilities with reactive chemicals, that EPA's RMP does not cover. OSHA estimates this adds ten percent of RMP Program 3 facilities and processes to the total. This gives 603 establishments ($0.10 \times 6,028$). OSHA staff estimates that there would be one process at each establishment giving 603 more processes.
- The second group is for flammables, where OSHA's coverage starts at a lower flash point than RMP's criteria. OSHA estimates this will add 25 percent of RMP Program 3 facilities, again with one process each. This gives 1,507 establishments ($0.25 \times 6,028$) and the same number of processes.
- The third group is RMP Program 1 facilities. Technical staff estimates that 70 percent, one process each, are covered by PSM. This gives 459 (0.70×656) additional establishments and processes.

¹³ To estimate the number of Program 3 processes in this ICR, OSHA assumed that the number of Program 3 processes declined at the same rate as total facilities in these states, dividing the 10,481 establishments reported in this ICR by the 10,771 establishments in the previous ICR to estimate the proportional decline (97.3 %). OSHA then multiplied this rate by the total number of Program 3 processes from the previous ICR, resulting in an estimate of 8,885 Program 3 processes (excluding CA, DE, and NJ).

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- Finally, OSHA is including explosive and pyrotechnic manufacturing facilities. These facilities are covered by PSM but not RMP. Here OSHA takes all of NAICS 325920 (explosives manufacturing) and an estimate of the number of pyrotechnic manufacturing facilities in NAICS 325998 (miscellaneous explosives manufacturing), as facilities that are both covered by PSM. Again, OSHA estimates one process per establishment. The most recent County Business Patterns data of 2022 has 90 establishments in NAICS 325920. The Dun and Bradstreet database¹⁴ was used to estimate the number of facilities in NAICS 325998 that are considered pyrotechnic facilities, SIC 288904 (Flares, Fireworks and Similar Preparations), as 283. This gives 373 establishments due to explosives (90 +283) and the same number of processes.

Combining the estimates for reactives, flammables, RMP Program 1 facilities, and explosives, gives a total of 2,942 establishments (603 + 1,507 + 459 + 373) and the same number of processes, to be included in the cost analysis. Estimates for elements consistent with the previous ICR are for Program 3 facilities which are 6,028 establishments and 8,885 processes. Finally, altogether the total estimates are 8,970 establishments (2,942+ 6,028) and 11,827 processes (2,942 + 8,885), which are the total respondents for this information collection.

Burden Hour Calculations for facilities not included in the RMP data

Facilities are in RMP Program 1 because any releases would have a smaller impact. They are already subject to some requirements under EPA RPM and their technology is much less complex. Similarly, this will also mean the burden hours and cost for PSM will also be less than for the average facility in this ICR analysis. The number of employees at the facility is a rough proxy for technological complexity but is suggestive. There are a few very large facilities in RMP Program 1 that lead to an estimated mean employment of 96¹⁵ versus a median of only 14. Technical staff judges that in many of these very large facilities only a small part would be covered by PSM, that the covered process would only be a small portion of the facility's production, and that therefore the median of 14 is a better proxy for the typical complexity of these facilities. This compares to the estimated mean of 227 for RMP Program 3 facilities.

If employment was a perfect measure of technology complexity and hours per burden this would give an estimate of 6.2% (14/227) as the typical burden that should be given to RMP program 1 facilities. This is just suggestive and given the only rough proxy of employment to technological complexity, the technical staff judges that 20% of the burden for the RMP program 3 facilities is a reasonable estimate. The technical staff also judges the other categories not included in the RMP

¹⁴ Retrieved March 28, 2025.

¹⁵ The RMP data used did not include employment by facility, therefore a list of facilities by employment range (0-4 full-time equivalent (FTE), 5-19 FTEs, 20-39 FTEs, 40-349 FTEs and >350 FTEs) was used to estimate the mean and median employment figures discussed in this paragraph. Within each range, OSHA used the distribution of employment from the previous ICR within the range to estimate the employment within each existing facility.

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data: reactives, flammables, and explosives are also at this lower range of complexity and assigns the same 20% factor for hours per burden.

Determination of Establishment Counts

There is a small inflow of new facilities covered by the PSM standard each year that will result in an additional burden in hours and costs. The agency identified all new PSM facilities (all new RMP Program 3 facilities and 70 percent of new RMP Program 1 facilities) that entered the RMP database over the last three years (March 2022 to March 2025) and divided them by three to get an estimate of the annual number of new facilities entering PSM within the RMP dataset (this is the same methodology as past ICRs). This estimate of new PSM facilities in 2025 was divided by the count of all PSM facilities in the 2025 data (all RMP 3 and 70 percent of RMP 1 facilities) to estimate the percentage of new facilities 2.38%. This estimate was then used to estimate the number of new facilities and processes among the extrapolated categories: reactives, flammables, and explosives. Altogether, this leads to an estimate that there are annually 174 new PSM-covered facilities with 219 associated processes.

There is a total of 9,144 establishments that report annually (8,970 existing facilities and 174 new PSM-covered facilities). All estimates for future years assume a total fixed number of establishments so the analysis is assuming the same number of establishments drop out of the PSM standard as the number who joins (this is the same assumption as in past ICRs).

Wage Rates

The agency determined the wage rate from mean hourly wage earnings to represent the cost of employee time. For the relevant standard occupation classification category, OSHA used the wage rates reported in the Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Employment and Wage Statistics (OEWS), *May 2023 National Occupational Employment and Wage Estimates* [https://www.bls.gov/oes/2023/may/oes_nat.htm date accessed: February 18, 2025].

To account for fringe benefits, the agency used the fringe markup from the following BLS release: *Employer Costs for Employee Compensation – December 2024* news release text; released at 10:00 a.m. (ET) Tuesday, March 14, 2025. [https://www.bls.gov/news.release/archives/ecec_03142025.pdf]. BLS reported that for private industry workers, fringe benefits accounted for 29.5 percent of total compensation and wages accounted for the remaining 70.5 percent.

TABLE 1 – WAGE HOUR ESTIMATES				
Occupational Title	SOC Code	Mean Hour Wage Range (A)	Fringe Benefits (B)	Loaded Hourly Wage Range (C) = (A)/(1-B)
Engineers				
Level III	17-0000	\$47.64	0.295	\$67.57
Level IV	17-2199	\$56.90	0.295	\$80.71

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TABLE 1 – WAGE HOUR ESTIMATES				
Occupational Title	SOC Code	Mean Hour Wage Range (A)	Fringe Benefits (B)	Loaded Hourly Wage Range (C) = (A)/(1-B)
Level V	17-2041	\$59.09	0.295	\$83.82
Blue Collar Supervisor	51-1011	\$34.48	0.295	\$48.91
Production Workers	51-0000	\$22.90	0.295	\$32.48
Service Worker	39-0000	\$18.48	0.295	\$26.21
Clerical Worker	43-9061	\$20.94	0.295	\$29.70

OSHA is basing its burden hour assumptions for all facilities from the same estimates as the original PSM rule and the previous ICR.

(A) Employee Participation (paragraph (c)(1)-(c)(3)). In the 1999 ICR, OSHA indicated that the on-going burden of employee participation required by paragraph (c) is included in other elements of the Standard and, therefore, no burden hours were assigned to this paragraph. Comments to the ICR concurred with the agency's assessment regarding this burden.

(B) Process Safety Information (paragraph (d)). Based on the compliance schedule specified in paragraphs (e)(1)(i)-(e)(1)(v) of the Standard, OSHA believes only new establishments need to compile the written process safety information required by this provision. Therefore, the agency is determining burden hour and cost estimates only for new establishments. For each of these establishments, this task requires 50 hours each from a level IV engineer and a blue-collar supervisor, as well as 54 hours each from two production workers, for a total of 208 hours per establishment.

As discussed above, OSHA estimates the facilities that have lower technological complexity than the RMP Program 3 facilities will require 20% of the time estimated for RMP Program 3 facilities. There are 43 new facilities with lower technological complexity and 131 new RMP Program 3 facilities.

Annual Burden Hours and Costs

New RMP Program 3 Facilities:

There are 131 new facilities that will need to compile the written safety information. OSHA assumes a level IV engineer making \$80.71 an hour will take 50 hours, a blue-collar supervisor making \$48.91 an hour will take 50 hours, and two production workers making \$32.48 an hour will take 108 hours to compile the needed information for the new RMP 3 facilities.

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Burden hours: 131 facilities per Level IV Engineer x
50 hours = 6,550 hours

Cost: 6,550 hours x \$80.71 (Level IV
Engineer) = \$528,651

Burden hours: 131 facilities per Blue Collar
Supervisor x 50 hours = 6,550 hours

Cost: 6,550 hours x \$48.91 (Blue Collar
Supervisor) = \$320,361

Burden hours: 131 facilities per 2 Production Workers
x 108 hours = 14,148 hours

Cost: 14,148 hours x \$32.48 (2 Production
Workers) = \$459,527

New Lower Technological Complexity Facilities:

There are 43 new facilities that will need to compile the written safety information. Compared to RMP Program 3 facilities, these facilities will take 20 percent of the time to compile the written safety information. OSHA assumes a level IV engineer making \$80.71 an hour will take 10 hours ($0.20 * 50 \text{ hours} = 10 \text{ hours}$), a blue-collar supervisor making \$48.91 an hour will take 10 hours, and two production workers making \$32.48 an hour will take 21.6 hours to compile the needed information for the new lower technological complex facilities.

Burden hours: 43 facilities per Level IV Engineer x 10
hours = 430 hours

Cost: 430 hours x \$80.71 (Level IV Engineer)
= \$34,705

Burden hours: 43 facilities per Blue Collar Supervisor
x 10 hours = 430 hours

Cost: 430 hours x \$48.91 (Blue Collar
Supervisor) = \$21,031

Burden hours: 43 facilities per 2 Production Workers x
21.6 hours = 929 hours

Cost: 929 hours x \$32.48 (2 Production
Workers) = \$30,174

(C) Process Hazard Analysis (paragraph (e)(1)). Only new establishments need to perform an initial process hazard analysis for each covered process. Accordingly, for each of these

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establishments, this task is estimated to require 100 hours each from a level IV engineer and a blue-collar supervisor, as well as 18 hours each from two production workers, for a total of 236 hours per establishment.

As discussed above, OSHA estimates the facilities with lower technical complexity relative to RMP Program 3 facilities, will require 20% of the time to perform the hazard analyses. There are 43 new lower technological complexity facilities each year and 131 new RMP Program 3 facilities.

Annual Burden Hours and Costs

There are 131 new facilities that will need to do an initial hazard analysis. OSHA assumes a level IV engineer making \$80.71 an hour will take 100 hours, a blue-collar supervisor making \$48.91 an hour will take 100 hours, and two production workers making \$32.48 an hour will take 36 hours to compile the needed information for the new RMP 3 facilities.

New RMP Program 3 Facilities:

Burden hours: 131 facilities per Level IV Engineer x
100 hours = 13,100 hours

Cost: 13,100 hours x \$80.71 (Level IV
Engineer) = \$1,057,301

Burden hours: 131 facilities per Blue Collar
Supervisor x 100 hours = 13,100 hours

Cost: 13,100 hours x \$48.91 (Blue Collar
Supervisor) = \$640,721

Burden hours: 131 facilities per 2 Production Workers
x 36 hours = 4,716 hours

Cost: 4,716 hours x \$32.48 (2 Production
Workers) = \$153,176

New Lower Technological Complexity Facilities:

There are 43 new facilities that will need to do an initial hazard analysis. As discussed above, these facilities will take 20 percent of the time estimated for more complex facilities to initiate hazard analysis. OSHA assumes a level IV engineer making \$80.71 an hour will take 20 hours, a blue-collar supervisor making \$48.91 an hour will take 20 hours, and two production workers making \$32.48 an hour will take 7.2 hours to compile the needed information for the new lower technological complex facilities.

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Burden hours: 43 facilities per Level IV Engineer x 20
hours = 860 hours

Cost: 860 hours x \$80.71 (level IV engineer)
= \$69,411

Burden hours: 43 facilities per Blue Collar Supervisor
x 20 hours = 860 hours

Cost: 860 hours x \$48.91 (Blue Collar
Supervisor) = \$42,063

Burden hours: 43 facilities per 2 Production Workers x
7.2 hours = 310 hours

Cost: 310 hours x \$32.48 (2 Production
Workers) = \$10,069

(D) Resolution of Hazards (paragraph (e)(5)). Documenting how and when the employer resolves the findings and recommendations of the team that conducted the process hazard analysis, and communicating this information to the appropriate workers, takes a level IV engineer, at a cost of \$80.71 per hour, 22 hours per establishment. As this provision addresses initial process hazard analyses, only new establishments are affected.

As discussed above, OSHA estimates the facilities that have lower technological complexity than the RMP Program 3 facilities will require 20% of the time estimated for RMP Program 3 facilities. There are 43 new facilities with lower complexity each year and 131 new RMP Program 3 facilities.

The agency determined the annual estimated burden hours and cost for this provision as follows:

Annual Burden Hours and Costs

New RMP Program 3 Facilities:

Burden hours: 131 facilities per Level IV Engineer x
22 hours = 2,882 hours

Cost: 2,882 hours x \$80.71 (Level IV
Engineer) = \$232,606

New Lower Technological Complexity Facilities:

Burden hours: 43 facilities per Level IV Engineer x
4.4 hours = 189 hours

Cost: 189 hours x \$80.71 (Level IV Engineer)

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= \$15,254

(E) Updating, Revalidating, and Retaining the Process Hazard Analysis (paragraphs (e)(6) and (e)(7)). Updating or revalidating the hazard analysis for each existing process every five years (i.e., 20% of 11,827 processes, or 2,365 per year) and retaining process-analysis information and the documents specified by paragraph (e)(5) requires 50 hours from a level IV engineer.¹⁶ The number of existing RMP Program 3 more complex processes is 1,777 while the number of less complex processes is 588. Total processes for both RMP Program 3 and less technological complex facilities are 2,365 (1,777 + 588 = 2,365). As stated above, OSHA estimates the lower technological complexity facility processes will require 20% of the time burden estimated for RMP Program 3 facility processes.

Annual Burden Hours and Costs

RMP Program 3 More Complex Facilities:

Burden hours:	1,777 processes per year x 50 hours = 88,850 hours
Cost:	88,850 hours x \$80.71 (Level IV Engineer) = \$7,171,084

Lower Technological Complexity Facilities:

Burden hours:	588 processes per year x 10 hours = 5,880 hours
Cost:	5,880 hours x \$80.71 (Level IV Engineer) = \$ 474,575

(F) Operating Procedures (paragraph (f)(1)-(f)(4)). It takes a level IV engineer 22 hours, at a cost of \$80.71 per hour, to develop written operating procedures and safe work practices to control the movement of the contractor and its workers in process areas for each new process. For existing processes, updating operating procedures would be 20% of the estimate for new processes, or 4.4 (20% x 22) hours. In each year, there are 219 new processes (176 RMP 3 facility processes and 43 lower complexity processes) and 11,827 existing processes (8,885 RMP 3 facility processes and 2,942 less complex processes.) As stated above, OSHA estimates the lower technological complexity facility processes will take 20% of the time estimated for RMP Program 3 facility processes.

¹⁶ Although these paragraphs do not explicitly require that employers retain these records, OSHA is taking burden for record retention because it believes the 5-year updating and revalidation requirement specified by paragraph (e)(6) implies that employers retain these records.

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The yearly burden hours and costs for this provision are estimated to be:

Annual Burden Hours and Costs

New Processes:

RMP Program 3 More Complex Facilities:

Burden hours: 176 facility processes per year x 22
hours = 3,872 hours
Cost: 3,872 hours x \$80.71 (Level IV
Engineer) = \$312,509

Lower Technological Complexity Facilities:

Burden hours: 43 facility processes per year x 4.4
hours = 189 hours
Cost: 189 hours x \$80.71 (Level IV Engineer)
= \$15,254

Existing Processes

RMP Program 3 More Complex Facilities:

Burden hours: 8,885 processes per year x 4.4 hours =
39,094 hours
Cost: 39,094 hours x \$80.71 (Level IV
Engineer) = \$3,155,277

Lower Technological Complexity Facilities:

Burden hours: 2,942 processes per year x 0.88 hours =
2,589 hours
Cost: 2,589 hours x \$80.71 (Level IV
Engineer) = \$208,958

(G) Training (Initial, Refresher, and Documentation) (paragraphs (g)(1)-(g)(3)). The agency estimates that the Standard covers approximately 1,684,655 workers. This is made up of 1,650,788 employees in existing establishments, and 33,867 employees in new establishments.¹⁷ OSHA assumes that the worker turnover rate for the affected establishments

¹⁷For each type of facility (i.e., new Program 3, existing Program 3, new Program 1, existing Program 1) OSHA estimated the number of employees by multiplying the estimated number of facilities by the estimated average number of employees per facility. For program 3 facilities, OSHA multiplied the estimate of Program 3 facilities (6,028 existing and 131 new) by the average number of employees in Program 3 facilities (227 employees), resulting in

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is 10% of the workers per year, and that the 165,079 ($0.10 \times 1,650,788$) replacement workers require initial training under paragraph (g)(1). Then all new workers in both new and existing establishments will also need initial training, giving a total of 198,946 ($165,079 + 33,867$) employees.

In addition, paragraph (g)(2) requires that workers receive refresher training at least once every three years, for an annual total of 550,263 workers (i.e., one-third of 1,650,788 workers in existing establishments).¹⁸ The total number of both types of training is then 749,209 ($198,946 + 550,263$). A clerical worker takes three minutes, (3/60) hours, to generate and maintain the training record specified by paragraph (g)(3) for each of these workers, at an hourly wage rate of \$29.70.

The estimated annual burden hours and cost for maintaining refresher training records this provision are:

Annual Burden Hours and Costs

Burden hours: 749,209 employees x (3/60) hours = 37,460 hours

Cost: 37,460 hours x \$29.70 (Clerical Worker) = \$1,112,562

(H) Contractors (paragraphs (h)(2)(i)-(h)(2)(iv), (h)(2)(vi), (h)(3)(iii)), and (h)(3)(v)).

Paragraph (h) imposes collections of information on both employers and contractors. Obtaining and evaluating information regarding a contractor's safety performance and programs, informing a contractor of the specified hazards and the applicable provisions of the emergency action plan, developing and implementing safe work practices to control the entrance, presence and exit of contract employers and contract workers in covered process areas, maintaining a contract worker injury and illness log, documenting that contract workers have been trained to perform their work practices safely, and requiring the contractor to advise the employer of any unique hazard presented by the contract employer's work, or any hazards found by the contract employer's work requires 50 hours each from a level IV engineer, a blue-collar supervisor, and two production workers, for a total of 200 hours per establishment. In addition, the agency finds that these paperwork requirements affect 50 percent of all existing establishments each year as well as all new

an estimate of 1,368,356 employees in existing facilities and 29,737 for employees in new facilities. Similarly, the number of employees in less complex facilities was derived by multiplying the number of less complex facilities (2,942 existing and 43 new) by the average number of employees in Program Level 1 facilities (96), resulting in an estimate of 282,432 employees in existing facilities and 4,130 employees in new facilities. OSHA estimates that in total there are 1,650,788 ($1,368,356 + 282,432$) employees in Program 3 facilities and 33,867 ($29,737 + 4,130$) employees in Program 1 facilities.

¹⁸ The timing of turnover and retraining matters here. If retraining is all at the beginning of the year and turnover at the end, then this calculation is correct. To the extent that turnover happens earlier and that new firms may also have some turnover then refresher training numbers would be slightly smaller and initial training numbers slightly larger. Both effects would be negligible.

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establishments. Annually, OSHA estimates that this requirement affects 3,014 existing RMP 3 facilities (0.50 x 6,028) and 1,471 less complex facilities (0.50 x 2,942) as well as 131 new RMP Program 3 facilities and 43 new less complex facilities. As stated above, the agency estimates the lower technological complexity facility processes will require 20% of the time burden required for RMP Program 3 facility processes. Also, the existing establishments will take 20% of the time required for new establishments.

OSHA estimates the total burden hours and cost for these establishments each year to be:

Annual Burden Hours and Costs

New Facilities:

RMP Program 3 More Complex Facilities:

There are 131 new facilities that will need to develop and implement these safety measures. OSHA assumes a level IV engineer making \$80.71 an hour will take 50 hours, a blue-collar supervisor making \$48.91 an hour will take 50 hours, and two production workers making \$32.48 an hour will take 100 hours to develop and implement these new safety measures for the new RMP 3 facilities.

Burden hours: 131 facilities per Level IV Engineer x
50 hours = 6,550 hours

Cost: 6,550 hours x \$80.71 (Level IV
Engineer) = \$528,651

Burden hours: 131 facilities per Blue Collar
Supervisor x 50 hours = 6,550 hours

Cost: 6,550 hours x \$48.91 (Blue Collar
Supervisor) = \$320,361

Burden hours: 131 facilities for 2 Production Workers
x 100 hours = 13,100 hours

Cost: 13,100 hours x \$32.48 (2 Production
Workers) = \$425,488

Lower Technological Complexity Facilities:

There are 43 new facilities that will need to develop and implement these safety measures. As stated above, OSHA assumes that these facilities with lower technological complexity will require 20 percent of the time required for RMP Program 3 facilities. OSHA assumes a level IV engineer making \$80.71 an hour will take 10 hours, a blue-collar supervisor making \$48.91 an hour will take 10 hours, and two production workers making \$32.48 an hour will take 20 hours to develop and implement these new safety measures for the new lower technological complexity facilities.

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Burden hours: 43 facilities per Level IV Engineer x 10
hours = 430 hours

Cost: 430 hours x \$80.71 (Level IV Engineer)
= \$34,705

Burden hours: 43 facilities per Blue Collar Supervisor x
10 hours = 430 hours

Cost: 430 hours x \$48.91 (Blue Collar
Supervisor) = \$21,031

Burden hours: 43 facilities for 2 Production Workers x
20 hours = 860 hours

Cost: 860 hours x \$32.48 (2 Production
Workers) = \$27,933

Existing Facilities:

RMP Program 3 More Complex Facilities:

There are 3,014 existing facilities that will need to update and revise these safety measures. OSHA assumes that these facilities will take 20 percent of the time taken by new facilities. OSHA assumes a level IV engineer making \$80.71 an hour will take 10 hours, a blue-collar supervisor making \$48.91 an hour will take 10 hours, and two production workers making \$32.48 an hour will take 20 hours to update and revise these safety measures for the existing RMP 3 facilities.

Burden hours: 3,014 facilities per Level IV Engineer x
10 hours = 30,140 hours

Cost: 30,140 hours x \$80.71 (Level IV
Engineer) = \$2,432,599

Burden hours: 3,014 facilities per Blue Collar
Supervisor x 10 hours = 30,140 hours

Cost: 30,140 hours x \$48.91 (Blue Collar
Supervisor) = \$1,474,147

Burden hours: 3,014 facilities for 2 Production
Workers x 20 hours = 60,280 hours

Cost: 60,280 hours x \$32.48 (2 Production
Workers) = \$1,957,894

Lower Technological Complexity Facilities:

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There are 1,471 facilities that will need to update and revise these safety measures. As stated above, OSHA assumes safety measures at these facilities will require 20 percent of the time that existing RMP 3 facilities require. OSHA assumes a level IV engineer making \$80.71 an hour will take 2 hours, a blue-collar supervisor making \$48.91 an hour will take 2 hours, and two production workers making \$32.48 an hour will take 4 hours to update and revise these safety measures for the existing lower technological complex facilities.

Burden hours: 1,471 facilities per Level IV Engineer x
2 hours = 2,942 hours

Cost: 2,942 hours x \$80.71 (Level IV
Engineer) = \$237,449

Burden hours: 1,471 facilities per Blue Collar
Supervisor x 2 hours = 2,942 hours

Cost: 2,942 hours x \$48.91 (Blue Collar
Supervisor) = \$143,893

Burden hours: 1,471 facilities for 2 Production
Workers x 4 hours = 5,884 hours

Cost: 5,884 hours x \$32.48 (2 Production
Workers) = \$191,112

(I) Written Procedures, Inspections, and Testing (paragraphs (j)(2) and (j)(4)(iv)). OSHA estimates that for all processes, new and existing, employers must establish and implement the required written procedures, and must document each inspection and test performed on process equipment (including the specified information). For each new RMP 3 process, this task requires 8 hours of a level III engineer's time, 8.5 hours of a blue-collar supervisor's time, and 130 hours of a service worker's time, for a total of 146.5 hours per establishment. For existing processes, the agency estimates that the same tasks will take 20% of the effort required for new processes. In each year there are 219 new processes (176 RMP 3 facility processes and 43 less complex facility processes) and 11,827 existing processes (8,885 RMP 3 facility processes and 2,942 less complex facility processes.) As stated above, OSHA estimates the lower technological complexity facility processes will take 20% of the time required for RMP Program 3 facility processes.

The estimated total burden hours and cost for these processes each year are:

Annual Burden Hours and Costs

New Facilities:

RMP Program 3 More Complex New Processes:

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There are 176 new processes per year for the new facilities. OSHA assumes a level III engineer making \$67.57 an hour will take 8 hours, a blue-collar supervisor making \$48.91 an hour will take 8.5 hours, and a service worker making \$26.21 an hour will take 130 hours to develop and implement each new process per year for the new RMP 3 facilities.

Burden hours: 176 new processes per year x 8 hours =
1,408 hours

Cost: 1,408 hours x \$67.57 (Level III
Engineer) = \$95,139

Burden hours: 176 new processes per year x 8.5 hours
= 1,496 hours

Cost: 1,496 hours x \$48.91 (Blue Collar
Supervisor) = \$73,169

Burden hours: 176 new processes per year x 130 hours
= 22,880 hours

Cost: 22,880 hours x \$26.21 (Service
Workers) = \$599,685

Lower Technological Complexity New Processes:

There are 43 new processes per year for new facilities. The time for new lower technological complex facilities to develop and implement these new processes is assumed to be 20 percent of that required for RMP 3 facilities. OSHA is assuming that a level III engineer making \$67.57 an hour will take 1.6 hours (20% x 8 hours), a blue-collar supervisor making \$48.91 an hour will take 1.7 hours (20% x 8.5 hours), and a service worker making \$26.21 an hour will take 26 hours (20% x 130 hours) to develop and implement each new process per year for the new lower technological complexity facilities.

Burden hours: 43 new processes per year x 1.6 hours =
69 hours

Cost: 69 hours x \$67.57 (Level III Engineer)
= \$4,662

Burden hours: 43 new processes per year x 1.7 hours =
73 hours

Cost: 73 hours x \$48.91 (Blue Collar
Supervisor) = \$3,570

Burden hours: 43 new processes per year x 26 hours =
1,118 hours

Cost: 1,118 hours x \$26.21 (Service Worker)

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= \$29,303

Existing Facilities:

RMP Program 3 More Complex Existing Processes:

There are 8,885 processes per year for the existing RMP 3 facilities. OSHA assumes that for existing facilities, the number of new processes is equal to the number of retired processes. Since existing facilities already have some of these processes in place, these facilities will only be required to update and revise existing processes. OSHA assumes existing RMP 3 facilities will only require 20 percent of the time required for new RMP 3 facilities. OSHA is assuming that a level III engineer making \$67.57 an hour will take 1.6 hours, a blue-collar supervisor making \$48.91 an hour will take 1.7 hours, and a service worker making \$26.21 an hour will take 26 hours to update and revise each process per year for the existing RMP 3 facilities.

Burden hours: 8,885 processes per year x 1.6 hours =
14,216 hours

Cost: 14,216 hours x \$67.57 (Level III
Engineer) = \$960,575

Burden hours: 8,885 processes per year x 1.7 hours =
15,105 hours

Cost: 15,105 hours x \$48.91 (Blue Collar
Supervisor) = \$738,786

Burden hours: 8,885 processes per year x 26 hours =
231,010 hours

Cost: 231,010 hours x \$26.21 (Service
Worker) = \$6,054,772

Lower Technological Complexity Existing Processes:

There are 2,942 processes per year for the existing lower technological complex facilities. Since these existing facilities already have some of these processes in place then they are only updating and revising the processes which will take 20 percent of the time required by new lower technologically complex facilities OSHA is assuming that a level III engineer making \$67.57 an hour will take 0.32 hours (20% x 1.6 hours), a blue-collar supervisor making \$48.91 an hour will take 0.34 hours (20% x 1.7 hours), and a service worker making \$26.21 an hour will take 5.2 hours (20% x 26 hours) to update and revise each process per year for the existing lower technological complex facilities.

Burden hours: 2,942 processes per year x 0.32 hours =
941 hours

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Cost: 941 hours x \$67.57 (Level III Engineer)
= \$63,583

Burden hours: 2,942 processes per year x 0.34 hours =
1,000 hours

Cost: 1,000 hours x \$48.91 (Blue Collar
Supervisor) = \$48,910

Burden hours: 2,942 processes per year x 5.2 hours =
15,298 hours

Cost: 15,298 hours x \$26.21 (Service
Worker) = \$400,961

(J) Hot Work Permits (paragraph (k)). The agency estimates that small establishments issue six hot work permits per year for each covered process, while large establishments issue twice as many per year for each process due to the additional complexity of their operations. All small establishments are assumed to have one process and thus issue a total of six permits annually, while the average number for large establishments is 1.5 and issue 12 permits annually. The inflow of new establishments is assumed to have the same percentage of large and small establishments as the existing population. The total number of new facilities is 174 (43 new lower technology complexity facilities + 131 new RMP 3 facilities) and the total number of existing facilities is 8,970 (2,942 existing lower technology complexity facilities + 6,028 existing RMP 3 facilities) which all together gives a total of 9,144 facilities. Of this total number of facilities, there are an estimated 6,207 large establishments and 2,937 small establishments. In addition, OSHA assumes that a blue-collar supervisor, earning \$48.91 per hour, takes six minutes, (6/60) hours to complete this task.

The annual burden hour and cost estimates for these establishments are:

Annual Burden Hours and Costs

Large Establishments:

Burden hours: 6,207 establishments x 12 permits x 1.5
processes x 6/60 hours = 11,173 hours

Cost: 11,173 hours x \$48.91 (Blue Collar
Supervisor) = \$546,471

Small Establishments:

Burden hours: 2,937 processes per year x 6 permits x
1.0 process x 6/60 hours = 1,762 hours

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Cost: 1,762 hours x \$48.91 (Blue Collar
Supervisor) = \$86,179

(K) Management of Change (paragraphs (I)(1), (I)(4), and (I)(5)). To estimate the burden hours and cost associated with developing written management-of-change procedures and updating process safety information and operating procedures, the agency determined different hour requirements for large and small establishments, shown below. New establishments are assumed to have the same percentage of large and small establishments as existing establishments. The agency estimates that affected small establishments have one covered process each. The agency estimated that on average each small establishment would require 6 hours for a level IV engineer, earning \$80.71 per hour (\$80.71/hour x 6 hours = \$484 per small establishment), and 12.3 hours for production workers earning \$32.48 per hour (\$32.48/hour x 12.3 hours = \$400 per small establishment). The total burden unit hours per small establishment are 18.3 hours (6 hours + 12.3 hours). To account for the greater complexity of processes utilized by large establishments, the agency increased the estimated time for large establishments by multiplying a factor of three so giving 54.9 hours (18.3 hours x 3) per process.

The estimated total burden hours and cost are:

Annual Burden Hours and Costs:

Large Establishments:

Burden hours: 6,207 establishments x 1.5 processes x
18 hours = 167,589 hours

Cost: 167,591 hours x \$80.71 (Level IV
Engineer) = \$13,526,108

Burden hours: 6,207 establishments x 1.5 processes x
36.9 hours = 343,557 hours

Cost: 343,557 hours x \$32.48 (Production
Worker) = \$11,158,731

Small Establishments:

Burden hours: 2,937 establishments per year x 1.0
process x 6 hours = 17,622 hours

Cost: 17,622 hours x \$80.71 (Level IV
Engineer) = \$1,422,272

Burden hours: 2,937 establishments x 1.0 processes x
12.3 hours = 36,125 hours

Cost: 36,125 hours x \$32.48 (Production

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Worker) = \$1,173,340

(L) Incident Investigations (paragraphs (m)(4)-(m)(7)). To prepare an incident investigation report containing the specified information, document resolutions and corrective actions, provide the report for review by workers whose job tasks are relevant to the incident findings, and retain the reports for five years requires 16 hours from a level V engineer, 48 hours from a level IV engineer, 32 hours from a blue-collar supervisor, and 4 hours from a clerical worker, for a total of 100 hours to perform these tasks for each incident.¹⁹ The agency estimates that each establishment has one reportable incident each year.²⁰ To account for the lesser complexity of processes utilized by small establishments, the agency decreased the estimated time per process for small establishments by a factor of three so giving 33.3 hours (100 hours x (1/3) = 33.3 hours) per process.

The estimated total burden hours and cost are:

Annual Burden Hours and Costs

Large Establishments:

There are 6,207 large establishments that will need to prepare an incident investigation report. OSHA assumes a level V engineer making \$83.82 an hour will take 16 hours, a level IV engineer making \$80.71 an hour will take 48 hours, a blue-collar supervisor making \$48.91 an hour will take 32 hours, and a clerical worker making \$29.70 an hour will take 4 hours to prepare the incident investigation report.

Burden hours: 6,207 establishments x 1 processes x 16
hours = 99,312 hours

Cost: 99,312 hours x \$83.82 (Level V
Engineer) = \$8,324,332

Burden hours: 6,207 establishments x 1 processes x 48
hours = 297,936 hours

Cost: 297,936 hours x \$80.71 (Level IV
Engineer) = \$24,046,415

Burden hours: 6,207 establishments x 1 processes x 32
hours = 198,624 hours

Cost: 198,624 hours x \$48.91 (Blue Collar
Supervisor) = \$9,714,700

¹⁹ The 100-hour estimate is based on comments submitted in response to the 1996 ICR.

²⁰ From the original RIA.

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Burden hours: 6,207 establishments x 1 processes x 4
hours = 24,828 hours
Cost: 24,828 hours x \$29.70 (Clerical
Workers) = \$737,392

Small Establishments:

There are 2,937 small establishments that will need to prepare an incident investigation report. OSHA assumes a level V engineer making \$83.82 an hour will take 5.33 hours, a level IV engineer making \$80.71 an hour will take 16 hours, a blue-collar supervisor making \$48.91 an hour will take 10.67 hours, and a clerical worker making \$29.70 an hour will take 1.33 hours to prepare the incident investigation report. As state above, the small establishments will take one third of the time to prepare a report.

Burden hours: 2,937 processes per year x 1.0 process x
5.33 hours = 15,654 hours
Cost: 15,654 hours x \$83.82 (Level V
Engineer) = \$1,312,118

Burden hours: 2,937 processes per year x 1.0 process x
16 hours = 46,992 hours
Cost: 46,992 hours x \$80.71 (Level IV
Engineer) = \$3,792,724

Burden hours: 2,937 establishments x 1.0 processes x
10.67 hours = 31,338 hours
Cost: 31,338 hours x \$48.91 (Blue Collar
Supervisor) = \$1,532,742

Burden hours: 2,937 establishments x 1.0 processes x
1.33 hours = 3,906 hours
Cost: 3,906 hours x \$29.70 (Clerical Worker)
= \$116,008

(M) Emergency Planning and Response (paragraph (n)). It takes one hour of a level V engineer's time (at \$83.82 per hour) to establish an emergency action plan that includes procedures for handling small releases. OSHA estimates that this requirement affects only new establishments because existing establishments have already established action plans. Each year there will be 174 new facilities. Given the fixed elements of creating such a plan, regardless of the complexity of the technology, the agency judges that all establishments will have this same time of one hour.

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The yearly burden hours and cost for these establishments are estimated to be:

Annual Burden Hours and Costs

Burden hours: 174 establishments x 1 hour = 174 hours

Cost: 174 hours x \$83.82 (Level V Engineer) = \$14,585

(N) Compliance Audits (paragraphs (o)(1) and (o)(3)–(o)(5)). Certifying compliance with the standard once every three years after conducting a compliance audit, developing a report of the audit findings, determining and documenting an appropriate response to each of the audit findings, documenting that any deficiencies have been corrected, and retaining the last two audit reports, takes 32 hours from a level V engineer, 48 hours from a level IV engineer, 32 hours from a blue-collar supervisor, and 8 hours from a clerical worker, for a total of 120 hours to complete these paperwork tasks. The agency estimates that only one third of the 6,028 RMP 3 facilities will be affected by these provisions or 2,009 RMP 3 facilities (6,028 existing RMP 3 establishments divided by 3) and only one third of the 2,942 lower technological complexity facilities will be affected by this provisions or 981 lesser technological complexity facilities (2,942 less complex establishments divided by 3).²¹ As state above, OSHA estimates the lower technological complexity facility processes will take 20% of the time required for RMP Program 3 facility processes.

For each year, the estimated total burden hours and cost for these establishments are:

Annual Burden Hours and Costs

Existing RMP 3 More Complex Facilities:

There are 2,009 existing establishments preparing an audit report. OSHA assumes a level V engineer making \$83.82 an hour will take 32 hours, a level IV engineer making \$80.71 an hour will take 48 hours, a blue-collar supervisor making \$48.91 an hour will take 32 hours, and a clerical worker making \$29.70 an hour will take 8 hours to prepare a report.

Burden hours: 2,009 establishments x 1 processes x 32 hours = 64,288 hours

Cost: 64,288 hours x \$83.82 (Level V Engineer) = \$5,388,620

Burden hours: 2,009 establishments x 1 processes x 48 hours = 96,432 hours

Cost: 96,432 hours x \$80.71 (Level IV

²¹ This uniform rate is the same as the one used in the original RIA.

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Engineer) = \$7,783,027

Burden hours: 2,009 establishments x 1 processes x 32
hours = 64,288 hours

Cost: 64,288 hours x \$48.91 (Blue Collar
Supervisor) = \$3,144,326

Burden hours: 2,009 establishments x 1 processes x 8
hours = 16,072 hours

Cost: 16,072 hours x \$29.70 (Clerical
Workers) = \$477,338

Existing Lower Technological Complexity Facilities:

There are 981 existing establishments preparing an audit report. The lower technological complex establishments will take 20 percent of the time. OSHA assumes a level V engineer making \$83.82 an hour will take 6.4 hours, a level IV engineer making \$80.71 an hour will take 9.6 hours, a blue-collar supervisor making \$48.91 an hour will take 6.4 hours, and a clerical worker making \$29.70 an hour will take 1.6 hours to prepare a report.

Burden hours: 981 establishments x 1 processes x 6.4
hours = 6,278 hours

Cost: 6,278 hours x \$83.82 (Level V
Engineer) = \$526,222

Burden hours: 981 establishments x 1 processes x 9.6
hours = 9,418 hours

Cost: 9,418 hours x \$80.71 (Level IV
Engineer) = \$760,127

Burden hours: 981 establishments x 1 processes x 6.4
hours = 6,278 hours

Cost: 6,278 hours x \$48.91 (Blue Collar
Supervisor) = \$307,057

Burden hours: 981 establishments x 1 processes x 1.6
hours = 1,570 hours

Cost: 1,570 hours x \$29.70 (Clerical
Workers) = \$46,629

(O) Records Disclosure. The disclosure of records during an inspection is not subject to the PRA under 5 CFR 1320.4(a)(2). OSHA would only review records in the context of an open investigation of a particular employer to determine compliance with the Standard. Therefore,

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OSHA takes no burden or cost in this Supporting Statement for disclosing information during an inspection.

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Table 2 -- Estimated Annualized Respondent Burden Hour and Cost									
Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
(A) Employee Participation (paragraph (c)(1)-(c)(3))									
§1910.119(c)(3)	Employee	Employee Participation	0	0	0	0	\$32.48	\$0.00	0
Subtotal						0		\$0	0
(B) Process Safety Information (paragraph (d))									
§1910.119(d)	RMP Program 3 New Facilities	Level IV Engineer	131	1	50	6,550	\$80.71	\$528,651	131
		Blue Collar Supervisor	131	1	50	6,550	\$48.91	\$320,361	131
		2 Production Worker	131	1	108	14,148	\$32.48	\$459,527	131
§1910.119(d)	Lower Technological Complexity New Facilities	Level IV Engineer	43	1	10	430	\$80.71	\$34,705	43
		Blue Collar Supervisor	43	1	10	430	\$48.91	\$21,031	43
		2 Production Worker	43	1	21.6	929	\$32.48	\$30,174	43
Subtotal						29,037		\$1,394,449	522
(C) Process Hazard Analysis (paragraph (e)(1))									

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Table 2 -- Estimated Annualized Respondent Burden Hour and Cost									
Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
§1910.119(e)(1)(i)-(v)	RMP Program 3 New Facilities	Level IV Engineer	131	1	100	13,100	\$80.71	\$1,057,301	131
		Blue Collar Supervisor	131	1	100	13,100	\$48.91	\$640,721	131
		2 Production Worker	131	1	36	4,716	\$32.48	\$153,176	131
	Lower Technological Complexity New Facilities	Level IV Engineer	43	1	20	860	\$80.71	\$69,411	43
		Blue Collar Supervisor	43	1	20	860	\$48.91	\$42,063	43
		2 Production Worker	43	1	7.2	310	\$32.48	\$10,069	43
Subtotal						32,946		\$1,972,741	522
(D) Resolution of Hazards (paragraph (e)(5))									
§1910.119(e)(5)	RMP Program 3 New Facilities	Level IV Engineer	131	1	22	2,882	\$80.71	\$232,606	131
	Lower Technological Complexity New Facilities	Level IV Engineer	43	1	4.4	189	\$80.71	\$15,254	43
Subtotal						3,071		\$247,860	174
(E) Updating, Revalidating, and Retaining the Process Hazard Analysis (paragraphs (e)(6) and (e)(7))									

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Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
\$1910.119(e)(6) and (e)(7)	RMP Program 3 Existing Facilities	Level IV Engineer	1,777	1	50	88,850	\$80.71	\$7,171,084	1,777
	Lower Technological Complexity Facilities	Level IV Engineer	588	1	10	5,880	\$80.71	\$474,575	588
Subtotal						94,730		\$7,645,659	2,365
(F) Operating Procedures (paragraph (f)(1)-(f)(4))									
	RMP Program 3 New Facility Processes	Level IV Engineer	176	1	22	3,872	\$80.71	\$312,509	176
	Lower Technological Complexity New Facility Processes	Level IV Engineer	43	1	4.4	189	\$80.71	\$15,254	43
	RMP Program 3 Existing Facility Processes	Level IV Engineer	8,885	1	4.4	39,094	\$80.71	\$3,155,277	8,885
	Lower Technological Complexity Facility Processes	Level IV Engineer	2,942	1	0.88	2,589	\$80.71	\$208,958	2,942

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Table 2 -- Estimated Annualized Respondent Burden Hour and Cost									
Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
Subtotal						45,744		\$3,691,998	12,046
(G) Training Records (Documentation of Initial and Refresher Training) (paragraphs (g)(1)-(g)(3))									
§1910.119(g)(1)-(g)(3)	Employee	Training Records	749,209	1	0.05	37,460	\$29.70	\$1,112,562	749,209
Subtotal						37,460		\$1,112,562	749,209
(H) Contractors (paragraphs (h)(2)(i)-(h)(2)(iv), (h)(2)(vi), (h)(3)(iii)), and (h)(3)(v))									
§1910.119(h)(2)-(h)(3)	RMP Program 3 New Facilities	Level IV Engineer	131	1	50	6,550	\$80.71	\$528,651	131
		Blue Collar Supervisor	131	1	50	6,550	\$48.91	\$320,361	131
		2 Production Worker	131	1	100	13,100	\$32.48	\$425,488	131
	Lower Technological Complexity New Facilities	Level IV Engineer	43	1	10	430	\$80.71	\$34,705	43
		Blue Collar Supervisor	43	1	10	430	\$48.91	\$21,031	43
		2 Production Worker	43	1	20	860	\$32.48	\$27,933	43
	RMP Program 3 Existing Facilities	Level IV Engineer	3,014	1	10	30,140	\$80.71	\$2,432,599	3,014

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Table 2 -- Estimated Annualized Respondent Burden Hour and Cost									
Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
		Blue Collar Supervisor	3,014	1	10	30,140	\$48.91	\$1,474,147	3,014
		2 Production Worker	3,014	1	20	60,280	\$32.48	\$1,957,894	3,014
	Lower Technological Complexity Existing Facilities	Level IV Engineer	1,471	1	2	2,942	\$80.71	\$237,449	1,471
		Blue Collar Supervisor	1,471	1	2	2,942	\$48.91	\$143,893	1,471
		2 Production Worker	1,471	1	4	5,884	\$32.48	\$191,112	1,471
Subtotal						160,248		\$7,795,263	13,977
(I) Written Procedures, Inspections, and Testing (paragraphs (j)(2) and (j)(4)(iv))									
	RMP Program 3 New Facilities	Level III Engineer	176	1	8	1,408	\$67.57	\$95,139	176
		Blue Collar Supervisor	176	1	8.5	1,496	\$48.91	\$73,169	176
		Service Worker	176	1	130	22,880	\$26.21	\$599,685	176
	Lower Technological Complexity New Facilities	Level III Engineer	43	1	1.6	69	\$67.57	\$4,662	43

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Table 2 -- Estimated Annualized Respondent Burden Hour and Cost									
Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
		Blue Collar Supervisor	43	1	1.7	73	\$48.91	\$3,570	43
		Service Worker	43	1	26	1,118	\$26.21	\$29,303	43
	RMP Program 3 Existing Facilities	Level III Engineer	8,885	1	1.6	14,216	\$67.57	\$960,575	8,885
		Blue Collar Supervisor	8,885	1	1.7	15,105	\$48.91	\$738,786	8,885
		Service Worker	8,885	1	26	231,010	\$26.21	\$6,054,772	8,885
	Lower Technological Complexity Facilities	Level III Engineer	2,942	1	0.32	941	\$67.57	\$63,583	2,942
		Blue Collar Supervisor	2,942	1	0.34	1,000	\$48.91	\$48,910	2,942
		Service Worker	2,942	1	5.2	15,298	\$26.21	\$400,961	2,942
Subtotal						304,614		\$9,073,115	36,138
(J) Hot Work Permits (paragraph (k))									
	Large Establishments	Blue Collar Supervisor	6,207	18	0.1	11,173	\$48.91	\$546,471	126,288
	Small Establishments	Blue Collar Supervisor	2,937	6	0.1	1,762	\$48.91	\$86,179	12,198
Subtotal						12,935		\$632,650	138,486
(K) Management of Change (paragraphs (l)(1), (l)(4), and (l)(5))									

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Table 2 -- Estimated Annualized Respondent Burden Hour and Cost									
Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
	Large Establishments	Level IV Engineer	6,207	1.5	18	167,589	\$80.71	\$13,526,108	10,524
		Production Worker	6,207	1.5	36.9	343,557	\$32.48	\$11,158,731	10,524
	Small Establishments	Level IV Engineer	2,937	1	6	17,622	\$80.71	\$1,422,272	2,033
		Production Worker	2,937	1	12.3	36,125	\$32.48	\$1,173,340	2,033
Subtotal						564,893		\$27,280,451	25,114
(L) Incident Investigations (paragraphs (m)(4)-(m)(7)).									
	Large Establishments	Level V Engineer	6,207	1	16	99,312	\$83.82	\$8,324,332	7,016
		Level IV Engineer	6,207	1	48	297,936	\$80.71	\$24,046,415	7,016
		Blue Collar Supervisor	6,207	1	32	198,624	\$48.91	\$9,714,700	7,016
		Clerical Worker	6,207	1	4	24,828	\$29.70	\$737,392	7,016
	Small Establishments	Level V Engineer	2,937	1	5.3	15,654	\$83.82	\$1,312,118	2,033
		Level IV Engineer	2,937	1	16	46,992	\$80.71	\$3,792,724	2,033
		Blue Collar Supervisor	2,937	1	10.7	31,338	\$48.91	\$1,532,742	2,033
		Clerical Worker	2,937	1	1.3	3,906	\$29.70	\$116,008	2,033
Subtotal						718,590		\$49,576,431	36,196
(M) Emergency Planning and Response (paragraph (n))									

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Table 2 -- Estimated Annualized Respondent Burden Hour and Cost									
Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
	New Establishments	Level V Engineer	174	1	1	174	\$83.82	\$14,585	174
Subtotal						174		\$14,585	174
(N) Compliance Audits (paragraphs (o)(1) and (o)(3) - (o)(5))									
	RMP Program 3 Existing Facilities	Level V Engineer	2,009	1	32	64,288	\$83.82	\$5,388,620	2,009
		Level IV Engineer	2,009	1	48	96,432	\$80.71	\$7,783,027	2,009
		Blue Collar Supervisor	2,009	1	32	64,288	\$48.91	\$3,144,326	2,009
		Clerical Worker	2,009	1	8	16,072	\$29.70	\$477,338	2,009
	Lower Technological Complexity Existing Facilities	Level V Engineer	981	1	6.4	6,278	\$83.82	\$526,222	981
		Level IV Engineer	981	1	9.6	9,418	\$80.71	\$760,127	981
		Blue Collar Supervisor	981	1	6.4	6,278	\$48.91	\$307,057	981
		Clerical Worker	981	1	1.6	1,570	\$29.70	\$46,629	981
Subtotal						264,624		\$18,433,346	11,960
(O) Record Disclosure									
	Inspections	0	0	0	0	0	\$0.00	\$0	0
Subtotal						0		\$0	0

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Table 2 -- Estimated Annualized Respondent Burden Hour and Cost									
Information Collection Requirement	Respondents*	Type of Respondent	No. of Respondents	Responses per Respondent	Time per Response (Hours)	Burden Hours	Loaded Hourly Wage	Burden Costs	Total Responses
GRAND TOTALS						2,269,066		\$128,871,110	1,026,883

*=The number of unique respondents is 8,970.

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13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life) and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondent (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The cost determinations made under Item 12 account for the total annual cost burden to respondents or recordkeepers resulting from this collection of information requirements. There are no additional costs to the respondents.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 into a single table.

The disclosure of records during an inspection is not subject to the PRA under 5 CFR 1320.4(a) (2). OSHA would only review records in the context of an open investigation of a particular employer to determine compliance with the Standard. Therefore, OSHA takes no burden or cost in this Supporting Statement for disclosing information during an inspection.

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15. Explain the reasons for any program changes or adjustments.

OSHA is requesting an adjustment decrease in burden going from 2,325,294 to 2,269,066 hours, a difference of 56,228 hours. The decrease is due to a reduction in the number of establishments in the RMP database as of March 2025 going from 11,641 to 11,329 of total establishments. See Table 3.

Table 3 – Current and Requested Burden Hours

Information Collection Requirement	Currently Burden Hours	Requested Burden Hours	Adjustments
(A) Employee Participation (paragraph (c)(1)-(c)(3))	0	0	0
(B) Process Safety Information (paragraph (d))	16,723	29,037	12,314
(C) Process Hazard Analysis (paragraph (e)(1))	18,974	32,946	13,972
(D) Resolution of Hazards (paragraph (e)(5))	1,769	3,071	1,302
(E) Updating, Revalidating, and Retaining the Process Hazard Analysis (paragraphs (e)(6) and (e)(7))	97,180	94,730	-2,450
(F) Operating Procedures (paragraph (f)(1) - (f)(4))	45,391	45,744	353
(G) Training (Initial, Refresher, and Documentation) (paragraphs (g)(1) - (g)(3))	32,586	37,460	4,874
(H) Contractors (paragraphs (h)(2)(i) – (h)(2)(iii), (h)(2)(vi), and (h)(3)(iii))	148,472	160,248	11,776
(I) Written Procedures, Inspections, and Testing (paragraphs (j)(2) and (j)(4)(iv))	302,265	304,614	2,349
(J) Hot Work Permits (paragraph (k))	13,849	12,935	-914
(K) Management of Change (paragraphs (l)(1), (l)(4) and (l)(5))	614,972	564,893	-50,079
(L) Incident Investigations (paragraphs (m)(4) – (m)(7))	769,367	718,590	-50,777
(M) Emergency Planning and Response (paragraph (n))	106	174	68

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Information Collection Requirement	Currently Burden Hours	Requested Burden Hours	Adjustments
(N) Compliance Audits (paragraphs (o)(1) and (o)(3) – (o)(5))	263,640	264,624	984
(O) Records Disclosure	0	0	0
TOTALS	2,325,294	2,269,066	-56,228

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

OSHA will not publish the information collected under the Standard.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

OSHA lists current valid control numbers in §§ 1740.8, 1747.4, 1748.4, and 1926.5 and publishes the expiration date in the Federal Register notice announcing OMB approval of the information-collection requirement. (See 5 CFR 1320.3(f)(3).) OSHA believes that this is the most appropriate and accurate mechanism to inform interested parties of these expiration dates.

18. Explain each exception to the certification statement.

OSHA is not seeking an exception to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

There are no collections of information employing statistical methods.