

# FRANKLIN PSM COMPLIANCE MANUAL

## 1.0 Purpose

The "Franklin PSM Compliance Manual" is designed to accomplish the following objectives:

1.1 Provide guidance to International Paper (IP) - Franklin Mill employees on compliance efforts necessary to satisfy requirements of the "Process Safety Management" (PSM) regulation.

1.2 Detail administrative responsibilities and documentation requirements to identify how the Franklin Mill site has established, and will maintain, compliance with the PSM regulation.

## 2.0 Scope

Upon release of the PSM standard in 1992, the Franklin mill established a PSM steering committee to evaluate which, if any, process systems were affected by the regulation. Included in this review were chlorine, chlorine dioxide, methyl mercaptan, hydrogen sulfide, fuel oil, turpentine, ozone, nitrogen oxides, hydrogen peroxide, hydrochloric acid, and anhydrous ammonia. Most of these systems are not covered by PSM as they meet threshold quantity, concentration, or other technical exemptions allowed by the standard. The results of this initial evaluation resulted in two PSM-regulated chemical systems – chlorine and chlorine dioxide. A subsequent review of industry practice led to a third process system being covered by the PSM standard – turpentine. Upon implementation of bleaching process changes necessary to comply with EPA's "Cluster Rule", chlorine was eliminated and removed from the mill site, leaving the two currently covered systems:

- \* Chlorine Dioxide
- \* Turpentine

System boundaries containing process equipment included in the Franklin PSM compliance program have been established utilizing the "catastrophic failure" criteria identified in the regulation. These boundaries are identified in the applicable operating and maintenance manuals.

Revision of the PSM standard or to Franklin mill operations, which result in additional process systems affected by the regulation, will necessitate expansion of the PSM compliance program to insure compliance is maintained.

International Paper and third-party employees, potentially exposed to adverse health effects associated with a catastrophic release of highly hazardous chemicals, shall follow PSM-invoked requirements outlined in the "Franklin PSM Compliance Manual".

## 3.0 Responsibilities

3.1 The Franklin PSM Coordinator shall review and revise, as necessary, the PSM Compliance Manual on an annual basis.

## 4.0 Definitions

4.1 **Highly Hazardous Chemical:** Toxic, reactive, flammable, or explosive chemicals as defined in OSHA 29 CFR 1910.119, whose release could result in a catastrophic incident affecting the safety and health of all personnel at the mill site.

4.2 **Third-Party:** Non-IP personnel, employed by vendors, consultants, or contractors, who may be adversely affected upon catastrophic release of a highly hazardous chemical.

## 5.0 References

5.1 OSHA 29 CFR 1910.119 "Process Safety Management of Highly Hazardous Chemicals"

5.2 Franklin-Mill "Safety and Health Manual"

5.3 Bleach Plant Operations Manual

5.4 ClO<sub>2</sub> Operations Manual

5.5 Turpentine Operations Manual

5.6 PSM - Mechanical Maintenance Manual (Chlorine Dioxide)

5.7 PSM - Mechanical Maintenance Manual (Turpentine)

5.8 PSM - Electrical/Instrumentation Maintenance Manual (Chlorine Dioxide)

5.9 PSM - Electrical/Instrumentation Maintenance Manual (Turpentine)

## 6.0 Procedures

6.1 International Paper and third-party employees shall utilize the "Franklin PSM Compliance Manual" to determine appropriate action required to comply with the PSM regulation for process systems identified in Section 2.0 above.

6.2 The "Franklin PSM Compliance Manual" shall be reviewed and updated, as necessary, to reflect changes in the regulation or to Franklin mill process systems. At least annually, the manual shall be revalidated to insure that its "up-to-date" status is maintained.

6.3 Three copies of the "Franklin PSM Compliance Manual" shall be maintained at the Franklin Site, in the following locations:

Manual No.	Location
1	Loss Prevention Dept.
2	Fibers/Power & Recovery Office
3	Main Mill Maintenance Shop (Shift Foreman's Office)

## 7.0 Documentation

"Franklin PSM Compliance Manual"