

## WSPA Prioritized Topic List for L&I PSM Stakeholder Meetings

1. Use of ambiguous, overbroad, or undefined terms or phrases and wording that greatly changes/confuses intent and modifies regulation from prevention of catastrophic events to address virtually everything.
2. Process Safety Incident Definition.
3. Employee Collaboration Replaces Employee Participation.
4. Changing definitions from norms (something that is usual, typical or standard) that industry and regulators understand: isolate, RAGAGEP, hot work, preventative maintenance and qualified.
5. Use of prescriptive requirements that reduces flexibility, may not work for all situations, and may distract resources from more important work.
6. Major Change Definition and impacts on other elements: The definition for major change is misleading and unlimited because most changes would be considered major under the definition and the elimination of “highly” from “highly hazardous” further expands the scope.
7. The scope of the proposed rule is substantially different than the current rule: Justification for focusing just on petroleum refineries and broadening the scope of the rule with respect to processes in facilities that are covered.
8. Process for working with L&I to revise language in sections of rule where there needs to be additional provisions for compliance (such as timing).
9. The definition and application of the term “outage”: Intent with the definition of outage including a reduction in pressure and temperatures?
10. The human factors analysis based upon RAGAGEP: What does L&I consider to be RAGAGEP for a human factors analysis?