

**CROSS-REFERENCE BETWEEN PROPOSED AMENDMENTS TO PART 6 (TOXIC PROCESS GASES) PROVISIONS
vs. CLOSEST EQUIVALENT EXISTING *OCCUPATIONAL HEALTH & SAFETY REGULATION*
PART 6 (TOXIC PROCESS GASES) PROVISIONS**

SPECIFIC SECTIONS IN THE PROPOSED AMENDMENTS TO PART 6 (TPG) OF THE <i>OCCUPATIONAL HEALTH & SAFETY REGULATION</i> (OHSR)	CLOSEST EQUIVALENT EXISTING PROVISION IN THE <i>OHSR</i>	RATIONALE FOR REGROUPING / AMENDING THE <i>OHSR</i>
Section 6.116 (Definitions and interpretation)	<i>OHSR</i> 6.116 (Definitions) <i>OHSR</i> 6.117 (Application)	Adds, revises, and clarifies terms and definitions including what is a “ <i>toxic process gas</i> ”, a “ <i>TPG system</i> ” and “ <i>enclosure</i> ”; additional amendments are also made to revise and clarify the following: - when the proposed amendments to Part 6 TPG requirements apply; and - specific work processes that are excluded from the proposed amendments to the Part 6 TPG requirements.
	<i>OHSR</i> 24.100 (Ozone generators) <i>OHSR</i> 28.13 (Anhydrous ammonia)	These <i>OHSR</i> provisions will be repealed and are proposed to be part of the amendments for the Part 6 TPG requirements.
Section 6.117 (General employer obligation respecting toxic process gases)	None – New provisions	Adds new general requirements for the employer to: - eliminate TPGs from the workplace; and - if the elimination of a TPG from the workplace is not practicable, the employer must then comply with the provisions set out in the proposed amendments to the Part 6 TPG requirements.
Section 6.118 (Employer obligations where elimination of toxic process gases not practicable) Section 6.119 (Obligation to prepare assessment respecting toxic process gases)	<i>OHSR</i> 6.118 (Risk assessment) <i>OHSR</i> 6.119 (Exposure control plan)	Restructures, adds, and clarifies the general requirements for the employer to identify, assess, and control: (i) the circumstances; as well as (ii) the associated health and safety consequences that are associated with a release of TPGs from TPG systems and exposures of persons to TPGs. Amendments are also made to: - specify the elements of an assessment; and - strengthen, consolidate, revise, and clarify the requirements, if elimination of TPGs from the workplace is not practicable.
Section 6.120 (Employer has obligation to consult)	None – New provisions	Adds new requirements for the employer to consult with specific persons, to ensure that: (i) the circumstances; and (ii) the health and safety consequences associated with TPGs are: - identified, assessed, and controlled; and - understood and communicated with relevant persons, including joint health and safety committees, as well as persons familiar and knowledgeable about the TPG systems and the associated work activities.

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Section 6.121 (Control measures to stop releases of toxic process gases)	OHSR 6.126 (Shut-down device)	Clarifies and expands the requirements for the employer to address an inadvertent or uncontrolled release of a TPG, which includes developing and implementing control measures to promptly: - minimize the amount of a TPG that can be released; and - stop any further release.
Section 6.122 (Investigating unusual or unsafe conditions)	None – New provisions	Adds new requirements for employers to investigate unusual or unsafe conditions of a TPG system before an incident can potentially occur (<i>i.e.</i> , prior to something going wrong) and to keep specific persons aware of the investigations' outcomes. This is intended to help prevent workplace incidents, due to a potential failure or malfunction of the TPG system from occurring in the first place.
Section 6.123 (Written procedures and record-keeping respecting TPG systems)	OHSR 6.120 (Procedures) OHSR 6.132 (Maintenance)	Clarifies and expands the requirements whereby: - written procedures (including emergency procedures) must be prepared for all work activities associated with a TPG system; - a list of selected work activities is incorporated to help provide context of what "work activities" can include; and - records, with specific types of information for selected work activities, must be kept at the workplace. Expands and strengthens requirements to encompass inspection, calibration, testing, maintaining, and servicing of TPG systems; such work activities help to: - identify new or emerging circumstances, and the associated health and safety consequences; - ensure the safe operation of TPG systems; and - ensure that control measures are reliable and effective.
Section 6.124 (Instruction and training)	OHSR 6.121 (Education and training)	Strengthens instruction and training requirements, including: - specifying which topics the employer must provide; and - ensuring that instruction and training are effective and up-to-date.
Section 6.125 (Communications and transfer of information)	None – New provisions	Adds new requirements for employers to communicate and transfer relevant information between employers and other persons. This new requirement is intended to ensure that information that may be critical for the safe operation of a TPG system is communicated and transferred between relevant persons.

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Section 6.126 (Requirements respecting enclosures)	OHSR 6.122 (Enclosure) OHSR 6.123 (Testing) OHSR 6.124 (Ventilation) OHSR 6.125 (Emergency ventilation)	Consolidates and clarifies existing requirements on enclosures and ventilation. Additional amendments were made to: - clarify when the enclosure requirements apply; - clarify specific ventilation and testing requirements for the enclosure; and - ensure the proposed requirements are aligned with good occupational hygiene and engineering principles.
Section 6.127 (Respirators and when they must be worn)	OHSR 6.127 (Personal protective equipment)	Focuses on when an appropriate respirator must be worn; strengthens the respiratory protection requirements by specifying when a person must wear an appropriate respirator and clarifying that the employer is the duty holder.
Section 6.128 (Continuous monitoring systems)	OHSR 6.128 (Monitors and alarms)	Strengthens and clarifies the requirements on continuous monitoring systems that detect and monitor airborne concentrations of TPGs. Workers and other persons will often have little to no warning of: (i) an inadvertent or uncontrolled release of a TPG; or (ii) a catastrophic exposure event involving a hazardous air concentration of a TPG. Consequently, using an appropriate “continuous monitoring system” is critical to detect a TPG reliably and rapidly in the workplace atmosphere. Amendments are also made to: - strengthen and clarify the requirements for when, where and in what work situations continuous monitoring systems are required to protect workers; - clarify what is the safe and proper operation of continuous monitoring systems; - clarify what are the acceptable procedures and practices for the use of continuous monitoring systems; - revise, update, and align provisions on continuous monitoring systems with key consensus international standards and guidelines, as well as with good occupational hygiene and engineering principles; and - clarify the required frequency of calibration and testing of continuous monitoring systems, if specified by the manufacturer.
Section 6.129 (Pressure relief devices)	OHSR 6.129 (Pressure relief alarm systems)	Revises requirements to align with: - pressure vessel requirements in other parts of the OHSR; and - other relevant updated consensus standards, some of which are referenced by other regulatory agencies such as Technical Safety of British Columbia’s <i>Power Engineers, Boiler, Pressure Vessel and Refrigeration Safety Regulation’s “Adopted Codes and Standards”</i>.

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Section 6.130 (Requirements respecting components of TPG system)	OHSR 6.130 (Identification of controls)	Clarifies requirements on using markings or other effective means to: • identify components of a TPG system, and • readily determine the function of components of a TPG system that a person can safely activate or operate.
Section 6.131 (Requirements respecting equipment and machinery)	OHSR 6.131 (Piping systems)	Expands the safe design, use, and operational requirements to encompass all types of equipment and machinery that are intended to handle or store a TPG. Inadvertent or uncontrolled releases of a TPG can occur due to a leak from any corroded or damaged piece of equipment or machinery of a TPG system.
Section 6.132 (Inspection and verification prior to starting up a TPG system)	None – New provisions	Adds requirements, that are aligned with recognized practices, for employers to carry out specific actions prior to starting up a TPG system. Of note: • start-up a TPG system can result in unusual situations (e.g., TPG releases, TPG exposures and health and safety consequences to persons); and • inadvertent or uncontrolled releases of a TPG often occur during the start-up phase of a chemical process or operation.