



VOSH PROGRAM DIRECTIVE: 02-054B

ISSUED: April 28, 2025

**SUBJECT: Process Safety Management of Highly Hazardous Chemicals, 1910.119 – Inspection Procedures and Interpretive Guidance**

Purpose. This Directive establishes policies, provides clarifications and compliance guidance for to ensure that uniform procedures will be followed when conducting inspections to enforce the process safety management of highly hazardous chemicals standard.

*This Program Directive is an internal guideline not a statutory or regulatory rule and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.*

Scope. This directive applies VOSH-wide and especially to all VOSH Safety Compliance and On-site Consultation personnel.

References. OSHA Instruction CPL 2-2.45A (September 28, 1992); and  
OSHA Instruction CPL 2-2.45A, CH-1 (September 13, 1994)  
**OSHA Instruction CPL 02-01-065 (January 26, 2024)**

Cancellation. VOSH Program Directive 02-054 (August 1, 1993)  
**VOSH Program Directive 02-054A (August 1, 1999)**

Action. The Deputy Commissioner, Program and Regional Directors and Compliance Managers shall ensure that the policies and procedures established in this directive are adhered to in conducting inspections.

Effective Date. April 28, 2025

Expiration Date. Not Applicable.

Gary G. Pan  
Commissioner

Distribution:	Commissioner of Labor and Industry Assistant Commissioner VOSH Directors and Managers Legal Support and IMIS Staffs	Cooperative Programs Director and Manager VOSH Compliance and Cooperative Programs Staffs OSHA Regional III and Norfolk Area Offices
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Attachment: OSHA Instruction CPL 02-01-065 (January 26, 2024):  
[CPL 02-01-065 Process Safety Management of Highly Hazardous Chemicals \(osha.gov\)](#)

When the guidelines, as set forth in this Program Directive, are applied to the Department of Labor and Industry and/or to Virginia employers, the following federal terms if, and where they are used, shall be considered to read as below:

<u>Federal Terms</u>	<u>VOSH Equivalent</u>
OSHA	VOSH
Federal Agency	State Agency
Agency	Department
Regional Administrator	Commissioner
Area Director	Regional Director VOSH Program Director
Area Office/Regional Office	Regional Office
Regional Solicitor	Attorney General or VOSH Office of Legal Support (OLS)
Office of Statistics	VOSH Research and Analysis
29 CFR	VOSH Standard
Compliance Safety and Health Officer (CSHO) and/or Industrial Hygienist	CSHO
<i>OSHA Field Operations Manual (FOM)</i>	<i>VOSH Field Operation Manual (FOM)</i>
<u>OSHA Directives:</u>	<u>VOSH Program Directives:</u>
CPL 02-00-150, Field Operations Manual (FOM)	02-001G, VOSH Field Operations Manual (FOM)