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Docket Management System
Occupational Safety and Health Administration
U.S. Department of Labor

Re: Docket ID: OSHA-2015-0018

The Industrial Packaging Safety Alliance (PackSafe) submits these comments in connection with OSHA's November publication of the above-referenced docket providing a draft update of the agency's voluntary Safety and Health Program Management Guidelines.

PackSafe is a coalition of interested parties seeking to make industrial packaging safer for people, property, and the environment by advocating for regulatory clarity and consistency. PackSafe seeks to engage regulators and industry representatives to promote the safe handling and warehousing of hazardous and non-hazardous materials.

In its summary of what is new in this publication, OSHA lists several bullet points the first of which states that the guidelines are "a proactive approach to finding and fixing hazards *before* they cause injury, illness or death." Its second bullet states that the guidelines are aimed at "*improved safety and health* in all types of workplaces." [emphasis added.]

PackSafe applauds OSHA's efforts to provide employers and workers "with a sound, flexible framework for addressing safety and health issues in the workplace," but believes such voluntary guidelines mask ongoing serious workplace hazards that place employees at significant risk – risk that certainly is not addressed or mitigated by voluntary guidelines.

PackSafe has previously urged OSHA to take action to update its regulation at 20 C.F.R. § 1910.106 involving the storage of ignitable liquids. This regulation is based on an outdated fire code that is more than four decades old as well as OSHA interpretative letters. We urge the agency to overcome its regulatory inertia and the potential challenges of what OSHA has described as a "complex undertaking" and initiate a rulemaking to bring its regulations up-to-date.

Such an effort would be consistent with the published intent of OSHA's voluntary safety and health program guidelines and **would greatly benefit workers** who face potentially life-threatening hazards associated with the storage and handling of ignitable liquids every day in the workplace.

Respectfully submitted,



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