



**U.S. ENVIRONMENTAL PROTECTION AGENCY CHECKLIST
FOR RISK MANAGEMENT PROGRAM INSPECTIONS OR AUDITS***

At Program 3 Stationary Sources

Under Title 40 C.F.R. Part 68 - Chemical Accident Prevention Provisions

*The purpose of the reviews are different, but the information needs are similar.

Instructions. For each question answer by checking Yes (Y), No (N), or Not Applicable (NA). Each question is paraphrased from the regulation and the cite given. For every point of clarification or incident of violation list the evidence supporting it in the comment field. (For example, employee interview and name) . This document is divided into the Subparts and sections of the regulation -40 CFR Part 68. If a section does not apply to the subject source, indicate so and proceed to the next section. Certain sections may be used more than once, depending on the number of processes at the source.

GENERAL FACILITY INFORMATION

1. Facility Name:	
2. Mailing Address (Street, City, State, Zip):	
3. Physical Address or location description (Street, City, State, Zip):	
4. Latitude: Longitude: Where Taken:	
5. County:	
6. RMP Number: FRS Number:	
7. Facility Contact:	
8. Facility Contact Phone No.	
9. Facility Contact E-mail:	
10. Website (optional):	
11. List and Describe <u>all</u> Covered Processes and indicate which are being inspected/audited:	

§68 - SUBPART A – GENERAL
§68.10 - Applicability

Parameters	Y	N	NA	Comment
§68.10(a) – Is the facility a stationary source with more than a threshold quantity of a regulated substance in a process per §68.115?				
§68.10(b)(3) – Have emergency response procedures been <u>coordinated</u> with local planning and response organizations?				Verified with LEPC/FD contact (name):
a) Does facility have more than EPCRA TPQ of EHS?				
b) More than 10,000 lbs & required to have MSDS?				
c) Is facility required to file under EPCRA 312?				
a. Sent by March 1 to Fire, LEPC, and SERC?				(Circle ones confirmed) Fire LEPC SERC.
d) Has facility brought any new chemicals over 10,000 or EPCRA EHS TPQ over last 3 years?				
a. Was new chemical reported within 3 months to Fire, LEPC, SERC?				(Circle ones confirmed) Fire LEPC SERC
§68.10(d)(1) - Does the facility have a listed RMP NAICS code(s)?				
a) Does facility have EPCRA 313 NAICS code?				
b) Does facility have more than 10 FTE?				

If no to a&b STOP HERE. If Yes Continue.

Facility/Process: _____

c) Does facility manufacture/ process 25,000 lbs of a TRI chemical per year?				
d) Does facility otherwise use more than 10,000 lbs in any of the last 3 years?				
a. > 10,000 lbs of TRI chemical (NH ₃ , Propane) added to the closed covered process in a year? (Ex: Refrigeration)				
e) Has inspection identified any TRI chemicals not reported for last 3 years?				If YES list chemicals identified.
§68.10(d)(2) - Is facility subject to OSHA PSM?				

What is the program level for this process?	Program 1 Yes to §68.10(b)(3)	Program 2 neither Program 1 or Program 3	Program 3 Yes to either of §68.10(d)(1 or 2)
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Note: If the process is NOT Program 3, STOP and complete the Program 1 and 2 checklist!

§68 - SUBPART B - HAZARD ASSESSMENT

Parameters	Y	N	NA	Comment
§68.22 - Were the <u>parameters</u> for off-site consequence analysis followed?				
§68.25 - Has the facility analyzed and reported in the RMP the worst-case scenario for the process showing the <u>greatest distance</u> ? (Note: one each for toxic and flammable, if both are present)				
§68.28 - Has the facility prepared <u>at least one</u> alternative release scenario for each regulated <u>toxic and flammable</u> substance held in a covered process?				
§68.36 - Has the facility reviewed and updated the off-site consequence analysis(es) every five years or after an affective process change?				
§68.39 - Does the facility have the following <u>documentation</u> (records) supporting off-site consequences:				
(a) <u>Worst-case scenario</u> parameters, rationale for selection, and assumptions such as administrative or passive controls and their effects on release quantities or rates?				
(b) <u>Alternative release scenario</u> parameters, rationale for selection, and assumptions such as administrative or passive controls and their effects on release quantities or rates?				
(c) Estimated <u>release quantities, rates, and durations</u> ?				
(d) <u>Methodology</u> to determine distance to endpoints?				
(e) Data used to estimate <u>population and environmental receptors</u> potentially affected?				
§68.42 - Has the facility included all necessary data for all accidental releases (if any) that resulted in on-site <u>or</u> off-site consequences in its <u>5-year accident history</u> ?				Check "OSHA 300 Log"

§68 - SUBPART D - Program 3 Prevention Program				
Parameters	Y	N	NA	Comment
§68.65 Process Safety Information				
§68.65(b) - Has the facility compiled written information on the hazards of the <u>regulated substances in the process</u> including at least:				MSDS?
(1) <u>Toxicity</u> information;				
(2) <u>Permissible exposure limits</u> (PELs);				
(3) <u>Physical</u> data;				
(4) <u>Reactivity</u> data;				
(5) <u>Corrosivity</u> data;				
(6) Thermal and chemical <u>stability</u> data;				
(7) Hazardous effects of <u>inadvertent mixing</u> ?				
§68.65(c) - Has the facility compiled written information on the <u>technology of the process</u> , including at least:				
(1)(i) Block flow or simplified flow <u>diagram</u> ;				
(1)(ii) Process <u>chemistry</u> ;				
(1)(iii) Maximum intended <u>inventory</u> ;				
(1)(iv) <u>Safe upper and lower limits</u> for temperatures, pressures, flows or compositions;				
(1)(v) Evaluation of <u>consequences of deviations</u> ?				

Parameters	Y	N	NA	Comment
§68.65 Process Safety Information (continued)				
§68.65(d) - Has the facility compiled written information on the <u>equipment in the process</u> , including at least:				
(1)(i) <u>Materials</u> of construction;				
(1)(ii) Piping and instrument diagrams (<u>P&IDs</u>);				
(1)(iii) <u>Electrical</u> classification;				
(1)(iv) <u>Relief system</u> design and design basis;				
(1)(v) <u>Ventilation</u> system design;				
(1)(vi) Design <u>codes and standards</u> employed;				
(1)(vii) material and energy balances if built post 6/21/99;				
(1)(viii) <u>Safety systems</u> (interlocks, detection, suppression)?				
§68.65(d)(2) - Has the facility documented that the equipment complies with <u>recognized and accepted engineering practices</u> ?				
§68.65(d)(3) - If equipment is designed with <u>obsolete codes, standards, etc.</u> - has the facility documented that equipment is designed, maintained, inspected, tested, and operating safely?				

Parameters	Y	N	NA	Comment
§68.67 Process Hazard Analysis (PHA)				
§68.67(a) – Did the facility complete a PHA appropriate to the complexity of the process that identified, evaluated, and controlled the hazards involved in the process?				
§68.67(b) - Did the facility use at least one of the following <u>methodologies</u> : (1) What-If; (2) Checklist; (3) What-If/Checklist; (4) HAZOP; (5) FMEA; (6) Fault Tree Analysis; or (7) other appropriate equivalent method?				Indicate which:
§68.67(c) - Does the PHA address the following:				
(1) <u>Hazards of the process</u> ;				
(2) I.D. <u>previous incidents</u> with potential for catastrophic consequences;				
(3) <u>Engineering and administrative controls</u> such as methods of detection to provide early warning;				
(4) <u>Consequences of failure</u> of engineering and administrative controls;				
(5) Stationary source <u>siting</u> ;				
(6) Human factors;				
(7) Qualitative evaluation of a <u>range of possible safety</u> and <u>health effects</u> of failure of controls?				
§68.67(d) - Did the PHA team include: (1) a person experienced and <u>knowledgeable in the process</u> , and (2) a person experienced and knowledgeable in the PHA <u>methodology</u> ?				

Parameters	Y	N	NA	Comment
§68.67 Process Hazard Analysis (continued)				
§68.67(e) - Does the facility have a <u>system</u> to:				
<ul style="list-style-type: none"> • <u>Address the team's findings</u> and recommendations <u>timely</u>; 				
<ul style="list-style-type: none"> • <u>Document the resolution</u>; 				
<ul style="list-style-type: none"> • Document the <u>actions</u> to be taken; 				
<ul style="list-style-type: none"> • Develop a <u>written schedule</u> for completing actions; 				
<ul style="list-style-type: none"> • <u>Communicate</u> the actions to affected employees? 				
§68.67(f) - Does the facility <u>update and re-validate</u> the initial PHA at least every <u>five years</u> ?				
§68.67(g) - Does the facility <u>retain</u> all PHAs and updates as well as resolutions for the life of the process?				

Parameters	Y	N	NA	Comment
§68.69 Operating Procedures				
§68.69(a) - Are there <u>written operating procedures</u> for each covered process with <u>clear instructions</u> , consistent with PSI, addressing at least:				
(1) Steps for <u>each operating phase</u> :				
(1)(i) <u>Initial startup</u> ;				
(1)(ii) <u>Normal operations</u> ;				
(1)(iii) <u>Temporary operations</u> ;				
(1)(iv) <u>Emergency shutdown</u> , including conditions requiring emergency shutdown <u>and assignments of responsibilities</u> ;				
(1)(v) <u>Emergency operations</u> ;				
(1)(vi) <u>Normal shutdown</u> ;				
(1)(vii) <u>Startup following a shutdown</u> .				
(2) <u>Operating limits</u> :				
(2)(i) <u>Consequences of deviation</u> ;				
(2)(ii) Steps required to correct or avoid deviation.				
(3) <u>Safety and health considerations</u> :				
(3)(i) Properties and hazards of chemicals in the process;				
(3)(ii) <u>Precautions to prevent exposure</u> including engineering controls, administrative controls, and Personal protective equipment (PPE);				
(3)(iii) Control measures if exposure occurs;				
(3)(iv) <u>Quality control of raw materials</u> and control of inventory levels;				
(3)(v) Special or unique hazards.				
(4) <u>Safety systems</u> and their functions.				

Parameters	Y	N	NA	Comment
§68.69 Operating Procedures (continued)				
§68.69(b) - Are the operating procedures <u>readily accessible</u> to the employees who work in or maintain the process?				
§68.69(c) - Are the operating procedures <u>annually certified current by the owner/operator</u> and <u>reflecting changes</u> in chemicals technology, equipment, and the stationary sources?				
§68.69(d) - Are <u>safe work practices</u> established for <u>employees and contractors</u> to control hazards during operations such as:				
<ul style="list-style-type: none"> • Lockout/tagout; 				
<ul style="list-style-type: none"> • Confined space entry; 				
<ul style="list-style-type: none"> • Opening process equipment or piping, 				
<ul style="list-style-type: none"> • Support personnel entrance into the stationary source:? 				

§68.71 Training				
§68.71(a)(1) - Is each employee involved in a process <u>initially</u> trained in the process and operating procedures as specified in §68.69 with emphases on safety, health hazards, and emergency operations prior to working in the process?				
§68.71(b) - Are employees provided <u>refresher training</u> at least every <u>3 years</u> ?				
§68.71(c) - Does the facility <u>document</u> the: <u>identity</u> of each employee involved in the process, <u>date of training</u> , that the <u>training is understood by the employee</u> , and means used to verify understanding?				

Parameters	Y	N	NA	Comment
§68.73 Mechanical Integrity				
§68.73(b) - Has the facility <u>prepared and implemented written procedures</u> for maintaining process equipment?				
§68.73(c) - Are <u>employees involved in maintenance trained</u> for process maintenance activities <u>including the hazards</u> of the process in order to perform the job safely?				
§68.73(d)(1) - Are <u>inspections and tests</u> performed on process equipment?				
§68.73(d)(2) - Do inspections and tests on process equipment follow <u>recognized and generally accepted good engineering practices</u> ?				
§68.73(d)(3) - Is the <u>frequency</u> of inspections and tests on process equipment consistent with manufacturer's recommendations and good engineering practices?				
§68.73(d)(4) - For tests and inspections, are the: date of test, person who performed it, equipment serial number or i.d., description of the test, and results of the test <u>documented</u> ?				
§68.73(e) - Are <u>deficiencies identified</u> by test or inspection <u>corrected</u> before further use or in a timely and safe manner?				
§68.73(f)(1)- For new plants and equipment, does the facility take steps to <u>assure the equipment is suitable</u> for the application?				
§68.73(f)(2) - Does the facility perform checks and inspections to <u>verify that equipment is installed properly</u> and per specifications and instructions?				
§68.73(f)(3) - Does the facility assure that spare parts and maintenance materials are suitable for the application?				

Parameters	Y	N	NA	Comment
§68.75 Management of Change				
§68.75(a) - Has the facility established and implemented <u>written procedures to manage changes</u> (excepting “replacements-in-kind”) that affect the covered process?				
§68.75(b) - Do the procedures address the following:				
(1) <u>Technical basis</u> for the proposed change;				
(2) Impact of the change on <u>safety and health</u> ;				
(3) Modifications to <u>operating procedures</u> ;				
(4) Necessary <u>time period</u> for the change;				
(5) <u>Authorization</u> requirements for the proposed change?				
§68.75(c) - Are affected employees and contractors <u>informed</u> of, and <u>trained in</u> , the change prior to startup?				
§68.75(d) - If affected by a change, is the <u>process safety information</u> required by §68.65 updated accordingly?				
§68.75(e) - <u>If affected by a change, are the operating procedures</u> required by §68.69 updated accordingly?				

Parameters	Y	N	NA	Comment
§68.77 Pre-Startup Review				
§68.77(a) - Are <u>pre-startup safety reviews</u> conducted, if any new or modified stationary sources requires a change in the process safety information?				
§68.77(b) - Does the pre-startup safety review confirm the following <u>prior to introduction of regulated substances</u> :				
(1) Construction and equipment are in accordance with design specifications;				
(2) Adequate safety, operating, maintenance, and emergency procedures are in place;				
(3) For new stationary sources, PHA has been performed and resolved or implemented, and management of change requirements of §68.75 are met;				
(4) Training of each employee involved is completed?				

§68.79 Compliance Audits				
§68.79(a-b) - Has the facility <u>certified</u> that they have evaluated compliance with Subpart D, at least once <u>every three years</u> by at least <u>one person knowledgeable</u> of process?				
§68.79(c & e) - Does the facility prepare reports of the <u>audit findings</u> and retain the <u>two most recent reports</u> ?				
§68.79(d) - Does the facility promptly determine and document <u>responses</u> to compliance audit findings and <u>correct deficiencies</u> ?				

Parameters	Y	N	NA	Comment
§68.81 Incident Investigation				
§68.81(a-b) - Does the facility <u>investigate incidents</u> resulting in, or with the <u>potential</u> for, catastrophic releases within <u>48 hours</u> following the incident?				
§68.81(c) - Do the investigation teams consist of at least one <u>person knowledgeable in the process</u> ?				
§68.81(d) - Does the facility prepare investigation reports that include at a minimum:				
(1) Date of the incident;				
(2) Date the investigation began;				
(3) Incident description;				
(4) Factors contributing to the incident;				
(5) Recommendations?				
§68.81(e) - Is there a system to <u>promptly resolve</u> and document resolution of the report findings?				
§68.81(f) - Are the investigation findings <u>reviewed with affected personnel</u> , including applicable contractors?				
§68.81(g) - Are investigation reports retained for five years?				

Parameters	Y	N	NA	Comment
§68.83 Employee Participation				
§68.83(a) - Does the facility have a <u>written plan</u> to implement <u>employee participation</u> in PHA and applicable elements of process safety management?				
§68.83(b) - Does the facility <u>consult employees</u> and their representatives on the development of PHAs and elements of process safety management?				
§68.83(c) - Do employees and their representatives have access to all information required by 40 CFR §68?				

§68.85 Hot Work Permit				
§68.85(a) - Does the facility issue <u>hot work permits</u> for such work near covered processes?				
§68.85(b) - Does the facility's hot work permit <u>document</u> :				
<ul style="list-style-type: none"> • <u>Fire prevention and protection requirements</u> of 29 CFR 1910.252(a) are implemented prior to hot work operations; 				
<ul style="list-style-type: none"> • <u>Dates authorized</u> for hot work; 				
<ul style="list-style-type: none"> • <u>Object</u> on which hot work is to be performed? 				
§68.85(b) - Are hot-work permits kept until the subject <u>operation is complete</u> ?				

Parameters	Y	N	NA	Comment
§68.87 Contractors				
§68.87(b)(1) - Does the facility <u>evaluate information</u> regarding contractors safety performance and programs?				
§68.87(b)(2) - Does the facility <u>inform contractors</u> of the known potential fire, explosion, and toxic release <u>hazards</u> associated with the contractor's work and the process?				
§68.87(b)(3) - Does the facility inform contractors of the applicable <u>emergency response program</u> - Subpart E?				
§68.87(b)(4) - Has the facility implemented safe work practices consistent with §68.69(d) to <u>control contractor movement</u> in covered process areas?				
§68.87(c)(1) - Has the <u>contractor</u> assured that their <u>employees are trained</u> in the necessary <u>safe work practices</u> ?				
§68.87(c)(2) - Has the contractor assured that their employees are <u>instructed on</u> the known potential fire, explosion, or toxic release <u>hazards</u> of their job and the applicable provisions of the emergency action plan?				
§68.87(c)(3) - Regarding this section, has the contractor <u>documented</u> employee I.D., date of training, and means to verify training was understood?				
§68.87(c)(4) - Has the <u>contractor</u> assured that <u>their employees follow the safety rules</u> of the stationary source including the safe work practices of §68.69(d)?				
§68.87(c)(5) - Does the <u>contractor</u> advise the <u>facility</u> of <u>unique hazards</u> posed by the contract work or hazards found by contractor's work?				

§68 - SUBPART E - Emergency Response				
Parameters	Y	N	NA	Comment
§68.90 Applicability				
§68.90(b) – Does the facility rely on the LEPC/FD to respond to accidental releases of the regulated substance(s) <u>and</u> employees of this facility WILL NOT respond?				
§68.90(b)(1) - Does the facility have regulated <u>toxic</u> substances and is it <u>included in the community emergency response plan</u> ?				
§68.90(b)(2) - Does the facility have regulated <u>flammable</u> substances and has it <u>coordinated</u> response actions with the fire department?				
§68.90(b)(3) - Does the facility have appropriate <u>mechanisms</u> in place to notify emergency responders when needed?				

If the response was “YES” or “NA” to ALL questions in §68.90, “Applicability”, above, indicate NA to all parameters in §68.95, “Emergency Response Program”, below.

§68.95 Emergency Response Program				
§68.95(a) - Does the facility have an <u>emergency response program</u> containing:				
(1) An emergency response plan <u>at</u> the stationary source containing:				
(i) Procedures for <u>notifying</u> the public and responders of a release,				
(ii) Documentation of proper <u>first-aid</u> and emergency medical treatment for accidental human exposures,				
(iii) <u>Procedures</u> and measures for emergency response,				
(2) Procedures for use of <u>ER equipment</u> ,				
(3) Emergency response <u>training</u> for employees,				
(4) <u>Procedures</u> for review and update of the ER plan?				
§68.95(c) - Has the ER plan been <u>coordinated</u> with the community emergency response plan?				Verified with LEPC/FD contact (name):

SUMMARY QUESTIONS FOR PROGRAM 3

(Note: The information from previous sections is required to answer the following questions.)

§68 - SUBPART A - General				
Parameters	Y	N	NA	Comment
§68.12 - General Requirements				
§68.12(a) - Has the facility <u>submitted a single RMP</u> that reflects all processes at the facility as provided in §68.150 to §68.185?				
§68.12(d)(1) - Has the facility developed and implemented a <u>management system</u> as provided in §68.15?				
§68.12(d)(2) - Has the facility conducted a <u>hazard assessment</u> as provided in §68.20 to §68.42?				
§68.12(d)(3) - Has the facility implemented the <u>prevention requirements</u> of §68.65 to §68.87?				
§68.12(d)(4) - Has the facility developed and implemented an emergency response <u>program</u> as provided in §68.90 to §68.95?				

§68 - SUBPART G – Risk Management Plan				
Parameters	Y	N	NA	Comment
§68.155 – Executive Summary				
§68.155 – Does the Executive Summary address all six (6) required elements?				
(a) Prevention and Emergency Response policies				
(b) Stationary Source and regulated substance(s) handled				
(c) Prevention Program				
(d) 5-Year Accident History				
(e) Emergency Response				
(f) Planned changes to improve safety				
§68.160 - Registration				
§68.160(b)(6) & §68.195(b) – Is the emergency contact (name, title, phone number, & e-mail) provided and current? If not, what is the date of the emergency contact change (must be within 1 month of change)?				
§68.160(b)(14) – Was a contractor used to prepare the RMP? If so, was the contractor’s name, mailing address and phone number included in Section 1.8 a-f of the RMP?				
§68.165 – Offsite consequence analysis				
§68.165 – Was the offsite consequence analysis data reported correctly in Sections 2-5 of the RMP?				
§68.168 – Five-year accident history				
§68.168 – Did the five-year accident history include all required accidents and data related to the accidents in Section 6 of the RMP?				

Parameters	Y	N	NA	Comment
§68.175 – Prevention Program/Program 3				
§68.175 – Was the information in Section 7 of the RMP true and accurately reported?				
§68.180 – Emergency response program				
§68.180 – Was the information in Section 9 of the RMP true and accurate?				
§68.190 - Updates				
§68.190 – Was/were update(s) submitted on time?				
§68.190 – Were all 9 Sections of the RMP updated, as required?				
§68.195 – Required corrections				
§68.195(a) – Were there any accident(s) involving injury, death, environmental or significant property damage, offsite evacuation or shelter-in-place after April 9, 2004? If so, has the RMP been updated within 6 months of the accident, in accordance to §68.168, §68.170(j), and §68.175(l)?				

§68 - SUBPART H – Other Requirements				
§68.200 - Recordkeeping				
§68.200 – Have all required records been maintained for 5 years unless otherwise specified?				

§68 - SUBPART A - General				
Parameters	Y	N	NA	Comment
§68.15 Management				
§68.15(a) - Has the facility developed a <u>management system</u> to oversee the implementation of the risk management program elements?				
§68.15(b) - Has the facility assigned a <u>qualified person</u> or position that has overall responsibility for development and implementation of the risk management program elements?				
§68.15(c) - Are RMP implementation responsibilities to other than the qualified person or position <u>clearly documented</u> and lines of authority identified?				

Does facility have a <u>Risk Management Program</u> with <u>all</u> the required elements?				
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CAA Section 112(r)(6)(L) – Employees informed of right to participate in the physical inspection of the workplace. Was notification posted, upon receipt, in the area subject to the inspection?				
Does a collective bargaining unit represent employees?				List unit or organization.