

RMP Program Level 1 Process Checklist

General Facility Information

Facility Name:			
Mailing Address (Street, City, State, Zip):			
Physical Address (Street, City, State, Zip):			
Latitude/Longitude: (Source)			
County:			
RMP Number/ FRS Number:			
Facility Contact (Name, Title):			
Facility Contact Phone No:		Facility Contact Email:	
Reported NAICS Code(s):			

Inspection Information

Inspection Begin Date:		Inspection End Date:	
Arrival Time:		Departure Time:	
Lead Inspector	Name:	Organization:	Phone No./Email:
Participating Inspectors			

Subpart A-General [68.10-15]

General requirements followed and implemented as in 40 CFR 68.10-15?

☐ S☐ M☐ U☐ N/A

Comments:

General: Applicability [68.10]

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| 1. Has the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115, complied with the requirements of this part no later than the latest of the following dates [68.10(a)]:
<input type="checkbox"/> June 21, 1999? [68.10(a)(1)];
<input type="checkbox"/> Three years after the date on which a regulated substance is first listed under §68.130? [68.10(a)(2)];
<input type="checkbox"/> The date on which a regulated substance is first present above a threshold quantity in a process? [68.10(a)(3)]; or
<input type="checkbox"/> For any revisions to this part, the effective date of the final rule that revises this part? [68.10(a)(4)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Has the owner or operator complied with the public meeting requirement in §68.210(b) within 90 days of any RMP reportable accident at the stationary source with known offsite impacts specified in §68.42(a), that occurs after March 15, 2021? [68.10(e)] (See Item 2 of Subpart H) | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. <u>After December 19, 2024</u> , has the owner or operator submitted/updated a risk management plan to report a public meeting after an RMP reportable accident under §68.160(b)(21)? [68.10(f)(1)]? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 4. For the past five years prior to the submission of a RMP, the Program 1 process(es) has not had an accidental release resulting in offsite: death, injury, or response or restoration activities for an exposure of an environmental receptor? [68.10(g)(1)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 5. Is nearest public receptor beyond the distance to the toxic or flammable endpoint as defined in 40 CFR 68.22(a) for the Program 1 process(es)? [68.10(g)(2)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 6. Have emergency response procedures been coordinated between the stationary source and local emergency planning and response organization? [68.10(g)(3)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

General: General Requirements [68.12]

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| 7. Has the owner or operator of a stationary source with a process eligible for Program 1: [68.12(b)]
<input type="checkbox"/> Analyzed the worst-case release scenario for the process(es), as provided in §68.25?
<input type="checkbox"/> Document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in §68.22(a)? and
<input type="checkbox"/> Submitted in the RMP the worst-case release scenario as provided in §68.165? [68.12(b)(1)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 8. Has the owner or operator of a stationary source with a process eligible for Program 1: [68.12(b)]
<input type="checkbox"/> Complete the five-year accident history for the process? and
<input type="checkbox"/> Submitted it in the RMP as provided in §68.168? [68.12(b)(2)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 9. Has the owner or operator of a stationary source with a process eligible for Program 1 ensured that response actions have been coordinated with local emergency planning and response agencies? [68.12(b)(3)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

RMP Program Level 1 Process Checklist**Facility Name:** _____

10. Has the owner or operator of a stationary source with a process eligible for Program 1 certified in the RMP the following: [68.12(b)] “Based on the criteria in 40 CFR 68.10, the distance to the specified endpoint for the worst-case accidental release scenario for the following process(es) is less than the distance to the nearest public receptor: [list process(es)]. Within the past five years, the process(es) has (have) had no accidental release that caused offsite impacts provided in the risk management program rule (40 CFR 68.10(g)(1)). No additional measures are necessary to prevent offsite impacts from accidental releases. In the event of fire, explosion, or a release of a regulated substance from the process(es), entry within the distance to the specified endpoints may pose a danger to public emergency responders. Therefore, public emergency responders should not enter this area except as arranged with the emergency contact indicated in the RMP. The undersigned certifies that, to the best of my knowledge, information, and belief, formed after reasonable inquiry, the information submitted is true, accurate, and complete. [Signature, title, date signed].” ? [68.12(b)(4)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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General: Management [68.15]

Has the owner or operator:

11. Assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements? [68.15(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
12. Documented other persons responsible for implementing individual requirements of the risk management program and defined the lines of authority through an organization chart or similar document? [68.15(c)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Subpart B-Hazard Assessment-Worst-Case Scenario [40 CFR 68.20-42]

Does the RMP include one worst-case scenario for each Program 1 process as provided in 40 CFR 68.25? ☐ S ☐ M ☐ U ☐ N/A

Comments:

Hazard Assessment: Offsite consequence analysis parameters [68.22]

1. Used the following endpoints for offsite consequence analysis for a worst-case scenario: [68.22(a)] <input type="checkbox"/> For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] <input type="checkbox"/> For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)]; or <input type="checkbox"/> For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] <input type="checkbox"/> For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
2. Used appropriate wind speeds and stability classes for the release analysis? [68.22(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
3. Used appropriate ambient temperature and humidity values for the release analysis? [68.22(c)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
4. Used appropriate values for the height of the release for the release analysis? [68.22(d)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
5. Used appropriate surface roughness values for the release analysis? [68.22(e)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
6. Do tables and models, used for dispersion analysis of toxic substances, appropriately account for dense or neutrally buoyant gases? [68.22(f)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
7. Were liquids, other than gases liquefied by refrigeration only, considered to be released at the highest daily maximum temperature, based on data for the previous three years appropriate for a stationary source, or at process temperature, whichever is higher? [68.22(g)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Hazard Assessment: Worst-case release scenario analysis [68.25]

8. Has the owner or operator determined the worst-case release quantity to be the greater of the following: [68.25(b)] <input type="checkbox"/> If released from a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity? [68.25(b)(1)] <input type="checkbox"/> If released from a pipe, the greatest amount held in the pipe, taking into account administrative controls that limit the maximum quantity? [68.25(b)(2)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.a. Has the owner or operator for <u>toxic substances</u> that are <u>normally gases</u> at <u>ambient temperature</u> and handled as a gas or liquid under pressure:	
9.a.(1) Assumed the total quantity in the vessel or pipe would be released as a gas over 10 minutes? [68.25(c)(1)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.a.(2) Assumed that, in the absence of passive mitigation systems, the release rate would be the total quantity divided by 10? [68.25(c)(1)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.b. Has the owner or operator for <u>toxic gases</u> that are handled as <u>refrigerated liquids</u> at <u>ambient pressure</u> :	
9.b.(1) Assumed the substance would be released as a gas in 10 minutes, if not contained by passive mitigation systems or if the contained pool would have a depth of 1 cm or less? [68.25(c)(2)(i)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.b.(2) If released substance would be contained by passive mitigation systems in a pool with a depth > 1 cm; <input type="checkbox"/> Assumed the quantity in the vessel or pipe (as determined per 68.25(b)) would be spilled instantaneously to form a liquid pool? [68.25(c)(2)(ii)] <input type="checkbox"/> Calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d)? [68.25(c)(2)(ii)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.c. Has the owner or operator for <u>toxic substances</u> that are <u>normally liquids</u> at <u>ambient temperature</u> :	
9.c.(1) Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool? [68.25(d)(1)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.c.(2) Determined the surface area of the pool by assuming that the liquid spreads to 1 cm deep, if there is no passive mitigation system in place that would serve to contain the spill and limit the surface area, or if passive mitigation is in place, was the surface area of the contained liquid used to calculate the volatilization rate? [68.25(d)(1)(i)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.c.(3) Taken into account the actual surface characteristics, if the release would occur onto a surface that is not paved or smooth? [68.25(d)(1)(ii)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.c.(4) Determined the volatilization rate by accounting for the highest daily maximum temperature in the past three years, the temperature of the substance in the vessel, and the concentration of the substance if the liquid spilled is a mixture or solution? [68.25(d)(2)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.c.(5) Determined the rate of release to air from the volatilization rate of the liquid pool? [68.25(d)(3)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
9.c.(6) Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(d)(3)] What modeling technique did the owner or operator use? [68.25(g)] _____	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

RMP Program Level 1 Process Checklist**Facility Name:** _____9.d. Has the owner or operator for flammable gases:

9.d.(1) Assumed the quantity in a vessel(s) of flammable gas held as a gas or liquid under pressure is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(1)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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9.d.(2) For gas handled as refrigerated liquid that is not contained by passive mitigation systems, assumed the total quantity in a vessel(s) of refrigerated liquid is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(2)(i)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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9.d.(3) For gas handled as refrigerated liquid released to a contained area, assumed the quantity volatilized in 10 minutes results in a vapor cloud? [68.25(e)(2)(ii)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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9.d.(3) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(e)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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9.e. Has the owner or operator for flammable liquids:

9.e.(1) Assumed the entire quantity in the vessel or pipe, taking into account administrative controls that limit the maximum quantity, would be spilled instantaneously to form a liquid pool? [68.25(f)(1)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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9.e.(2) For liquids at temperatures below their atmospheric boiling point, calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d) and assumed that the quantity which becomes vapor in the first 10 minutes is involved in the vapor cloud explosion? [68.25(f)(1)-(2)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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9.e.(3) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(f)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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10. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.25(g)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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11. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(g)] What modeling technique did the owner or operator use? [68.25(g)] _____	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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12. Ensured that the passive mitigation system, if considered, is capable of withstanding the release event triggering the scenario and will still function as intended? [68.25(h)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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13. Considered also the following factors in selecting the worst-case release scenarios: [68.25(i)] <input type="checkbox"/> Smaller quantities handled at higher process temperature or pressure? [68.25(i)(1)] <input type="checkbox"/> Proximity to the boundary of the stationary source? [68.25(i)(2)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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Hazard Assessment: Five-year accident history [68.42]

14. Has the owner or operator included all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage? [68.42(a)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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15. Has the owner or operator reported the following information for each accidental release: [68.42(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<input type="checkbox"/> Date, time, and approximate duration of the release? [68.42(b)(1)]	
<input type="checkbox"/> Chemical(s) released? [68.42(b)(2)]	
<input type="checkbox"/> Estimated quantity released in pounds and percentage weight in a mixture (toxics)? [68.42(b)(3)]	
<input type="checkbox"/> NAICS code for the process? [68.42(b)(4)]	
<input type="checkbox"/> The type of release event and its source? [68.42(b)(5)]	
<input type="checkbox"/> Weather conditions (if known)? [68.42(b)(6)]	
<input type="checkbox"/> On-site impacts? [68.42(b)(7)]	
<input type="checkbox"/> Known offsite impacts? [68.42(b)(8)]	
<input type="checkbox"/> Initiating event and contributing factors (if known)? [68.42(b)(9)]	
<input type="checkbox"/> Whether offsite responders were notified (if known)? [68.42(b)(10)]	
<input type="checkbox"/> Operational or process changes that resulted from investigation of the release? [68.42(b)(11)]	

Subpart G-Risk Management Plan [40 CFR 68.150 – 68.195]

Documented a Risk Management Plan as provided in 40 CFR 68.150-68.195? ☐ S ☐ M ☐ U ☐ N/A

Comments:

1. Does the single registration form include, for each covered process: [68.160(b)(7)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<input type="checkbox"/> The name and CAS number of each regulated substance held above the threshold quantity in the process?	
<input type="checkbox"/> The maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits?	
<input type="checkbox"/> The five- or six-digit NAICS code that most closely corresponds to the process?	
<input type="checkbox"/> The correct program level of the process?	
2. Does the registration form include whether a public meeting has been held following an RMP reportable accident, pursuant to §68.210(b)? [68.160(b)(21)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
3. Does the owner or operator provide in the RMP: [68.180(a)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<input type="checkbox"/> Name, phone number and email address of local emergency planning and response organizations with which the stationary source last coordinated emergency response efforts, pursuant to §68.10(g)(3) or §68.93? [68.180(a)(1)]	
<input type="checkbox"/> A list of Federal or state emergency plan requirements to which the stationary source is subject? [68.180(a)(3)]	
4. Has the owner or operator reviewed and updated the RMP and submitted it to EPA [68.190(a)]? Reason for update:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<input type="checkbox"/> Five-year update. [68.190(b)(1)]	
<input type="checkbox"/> Within three years of a newly regulated substance listing. [68.190(b)(2)]	
<input type="checkbox"/> At the time a new regulated substance is first present in an already regulated process above threshold quantities. [68.190(b)(3)]	
<input type="checkbox"/> At the time a regulated substance is first present in a new process above threshold quantities. [68.190(b)(4)]	
<input type="checkbox"/> Within six months of a change requiring revised PHA or hazard review. [68.190(b)(5)]	
<input type="checkbox"/> Within six months of a change requiring a revised OCA as provided in 68.36. [68.190(b)(6)]	
<input type="checkbox"/> Within six months of a change that alters the Program level that applies to any covered process. [68.190(b)(7)]	

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| 5. If the owner or operator experienced an accidental release that met the five-year accident history reporting criteria (as described at 68.42) subsequent to April 9, 2004, did the owner or operator submit the information required at 68.168, 68.170(j) and 68.175(l) within six months of the release or by the time the RMP was updated as required at 68.190, whichever is earlier. | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 6. If the emergency contact information required at 68.160(b)(6) has changed since June 21, 2004, did the owner or operator submit corrected information within thirty days of the change? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

Subpart H-Other Requirements [40 CFR 68.200 – 68.210]

Implemented Other Requirements as provided in 40 CFR 68.200-68.210? ☐S ☐M ☐U ☐N/A
Comments:

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| 1. Has the owner or operator maintained records supporting the implementation of this part at the stationary source for five years? [68.200] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Did the owner or operator hold a public meeting to provide information required under §68.42(b), no later than 90 days after any RMP reportable accident at the stationary source with any known offsite impact specified in §68.42(a)? [68.210(b)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |