

RMP Program Level 2 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			

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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]

- | | |
|---|--|
| 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)]:

☐ June 21, 1999? [68.10(a)(1)];
☐ Three years after the date on which a regulated substance is first listed under §68.130? [68.10(a)(2)];
☐ The date on which a regulated substance is first present above a threshold quantity in a process? [68.10(a)(3)]; or
☐ For any revisions to this part, the effective date of the final rule that revises this part? [68.10(a)(4)] | ☐ Y ☐ N ☐ N/A |
| 2. Has the owner or operator complied with the emergency coordination activities in accordance with §68.93 by September 21, 2018? [68.10(b)] (See Items 2 through 5 of Subpart E) | ☐ Y ☐ N ☐ N/A |
| 3. Has the owner or operator developed and implemented an emergency response program in accordance with §68.95 within three years of when the owner or operator determined that the stationary source is subject to the emergency response program requirements of §68.95? [68.10(c)] (See Items 1.b.(2) – 1.b.(7) of Subpart E) | ☐ Y ☐ N ☐ N/A |
| 4. Has the owner or operator developed plans for conducting emergency response exercises in accordance with §68.96 by December 19, 2023? [68.10(d)] (See Items 1.b.(8) – 1.b.(17) , 6 , and 7 of Subpart E) | ☐ Y ☐ N ☐ N/A |
| 5. 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) | ☐ Y ☐ N ☐ N/A |
| 6. <u>After December 19, 2024</u> , has the owner or operator reported in the RMP submission: [68.10(f)]

☐ A public meeting after an RMP reportable accident under §68.160(b)(21)? [68.10(f)(1)];
☐ Emergency response program information under §68.180(a)(1)? [68.10(f)(2)];
☐ Emergency response program information under §68.180(a)(2) and (3)? [68.10(f)(3)]; and,
☐ Emergency response program and exercises information under §68.180(b), as applicable? Including submittal of the following: [68.10(f)(4)]

☐ Dates of the most recent notification,
☐ Dates of field and tabletop exercises in the risk management plan,
☐ Dates for exercises completed as required under §68.96 at the time the risk management plan is either submitted under §68.150(b)(2) or (3), or is updated under §68.190. | ☐ Y ☐ N ☐ N/A |

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General: Program Eligibility [68.10(g)-(i)]

7. Does the covered process meet the eligibility requirements of Program 1? Specifically: [68.10(g)]

☐ Y ☐ N ☐ N/ADoes the covered process meet **all** of the following requirements:

- ☐ For the five years prior to the submission of an RMP, the process has **not** had an accidental release of a regulated substance where exposure to the substance, its reaction products, overpressure generated by an explosion involving the substance, or radiant heat generated by a fire involving the substance led to any of the following offsite? [68.10(g)(1)];
- ☐ Death; [68.10(g)(1)(i)]
- ☐ Injury; [68.10(g)(1)(ii)] or,
- ☐ Response or restoration activities for an exposure of an environmental receptor; [68.10(g)(1)(iii)] **and**
- ☐ The distance to a toxic or flammable endpoint for a worst-case release assessment conducted under subpart B and §68.25 is less than the distance to any public receptor, as defined in §68.3 [68.10(g)(2)]; **and**
- ☐ Emergency response procedures have been coordinated between the stationary source and local emergency planning and response organizations [68.10(g)(3)]

8. Does the covered process meet the eligibility requirements of Program 3? Specifically: [68.10(i)]

☐ Y ☐ N ☐ N/A

- ☐ The process does not meet the eligibility requirements of Program 1. [68.10(i)]; **and**

Is the covered process any of the following NAICS codes: [68.10(i)(1)]

- ☐ 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532; **or**
- ☐ Is the process subject to the OSHA process safety management standard, 29 CFR 1910.119? [68.10(i)(2)]

9. Does the covered process fail to meet the eligibility requirements of Program 1 and Program 3 (i.e., is the covered process a Program 2)? [68.10(h)]

☐ Y ☐ N ☐ N/A**General: Management [68.15]**

Has the owner or operator:

10. Developed a management system to oversee the implementation of the risk management program elements? [68.15(a)]

☐ Y ☐ N ☐ N/A

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)]

☐ Y ☐ N ☐ 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)]

☐ Y ☐ N ☐ N/A**Subpart B - Hazard Assessment [68.20-68.42]**

Hazard assessment conducted and documented as provided in 40 CFR 68.20-68.42?

☐ S ☐ M ☐ U ☐ N/A

Comments:

RMP Program Level 2 Process Checklist**Facility Name:** _____**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)] ☐ For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] ☐ For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)]; or ☐ For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] ☐ 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)]	☐ Y ☐ N ☐ N/A
2. Used the following endpoints for offsite consequence analysis for an alternative release scenario: [68.22(a)] ☐ For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] ☐ For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)] ☐ For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] ☐ 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)]	☐ Y ☐ N ☐ N/A
3. Used appropriate wind speeds and stability classes for the release analysis? [68.22(b)]	☐ Y ☐ N ☐ N/A
4. Used appropriate ambient temperature and humidity values for the release analysis? [68.22(c)]	☐ Y ☐ N ☐ N/A
5. Used appropriate values for the height of the release for the release analysis? [68.22(d)]	☐ Y ☐ N ☐ N/A
6. Used appropriate surface roughness values for the release analysis? [68.22(e)]	☐ Y ☐ N ☐ N/A
7. Do tables and models, used for dispersion analysis of toxic substances, appropriately account for dense or neutrally buoyant gases? [68.22(f)]	☐ Y ☐ N ☐ N/A
8. 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)]	☐ Y ☐ N ☐ N/A

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

9. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated toxic substance from covered processes under worst-case conditions? [68.25(a)(2)(i)]	☐ Y ☐ N ☐ N/A
10. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated flammable substance from covered processes under worst-case conditions? [68.25(a)(2)(ii)]	☐ Y ☐ N ☐ N/A
11. Analyzed and reported in the RMP additional worst-case release scenarios for a hazard class if the worst-case release from another covered process at the stationary source potentially affects public receptors different from those potentially affected by the worst-case release scenario developed under 68.25(a)(2)(i) or 68.25(a)(2)(ii)? [68.25(a)(2)(iii)]	☐ Y ☐ N ☐ N/A
12. Has the owner or operator determined the worst-case release quantity to be the greater of the following: [68.25(b)] ☐ 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)] ☐ 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)]	☐ Y ☐ N ☐ N/A

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13.a. Has the owner or operator for toxic substances that are normally gases at ambient temperature and handled as a gas or liquid under pressure:

13.a.(1) Assumed the whole quantity in the vessel or pipe would be released as a gas over 10 minutes? [68.25(c)(1)] ☐ Y ☐ N ☐ N/A

13.a.(2) Assumed the release rate to be the total quantity divided by 10, if there are no passive mitigation systems in place? [68.25(c)(1)] ☐ Y ☐ N ☐ N/A

13.b. Has the owner or operator for toxic gases handled as refrigerated liquids at ambient pressure:

13.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)] ☐ Y ☐ N ☐ N/A

13.b.(2) If released substance would be contained by passive mitigation systems in a pool with a depth > 1 cm;
☐ 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)]
☐ 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)] ☐ Y ☐ N ☐ N/A

13.c. Has the owner or operator for toxic substances that are normally liquids at ambient temperature:

13.c.(1) Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool? [68.25(d)(1)] ☐ Y ☐ N ☐ N/A

13.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)] ☐ Y ☐ N ☐ N/A

13.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)] ☐ Y ☐ N ☐ N/A

13.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)] ☐ Y ☐ N ☐ N/A

13.c.(5) Determined the rate of release to air from the volatilization rate of the liquid pool? [68.25(d)(3)] ☐ Y ☐ N ☐ N/A

13.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)] ☐ Y ☐ N ☐ N/A

What modeling technique did the owner or operator use? [68.25(g)] _____

13.d. Has the owner or operator for flammable gases:

13.d.(1) Assumed the quantity in a vessel(s) or pipe 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)] ☐ Y ☐ N ☐ N/A

13.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)] ☐ Y ☐ N ☐ N/A

13.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)] ☐ Y ☐ N ☐ N/A

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13.d.(4) 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)]	☐ Y ☐ N ☐ N/A
13.e. Has the owner or operator for <u>flammable liquids</u> :	
13.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)]	☐ Y ☐ N ☐ N/A
13.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)]	☐ Y ☐ N ☐ N/A
13.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)]	☐ Y ☐ N ☐ N/A
14. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.25(g)]	☐ Y ☐ N ☐ N/A
15. 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)] _____	☐ Y ☐ N ☐ N/A
16. 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)]	☐ Y ☐ N ☐ N/A
17. Considered also the following factors in selecting the worst-case release scenarios: [68.25(i)] ☐ Smaller quantities handled at higher process temperature or pressure? [68.25(i)(1)] ☐ Proximity to the boundary of the stationary source? [68.25(i)(2)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Alternative release scenario analysis [68.28]

18. Identified and analyzed at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes? [68.28(a)]	☐ Y ☐ N ☐ N/A
19. Selected a scenario: [68.28(b)] ☐ That is more likely to occur than the worst-case release scenario under 68.25? [68.28(b)(1)(i)] ☐ That will reach an endpoint off-site, unless no such scenario exists? [68.28(b)(1)(ii)]	☐ Y ☐ N ☐ N/A
20. Considered release scenarios which included, but are not limited to, the following: [68.28(b)(2)] ☐ Transfer hose releases due to splits or sudden hose uncoupling? [68.28(b)(2)(i)] ☐ Process piping releases from failures at flanges, joints, welds, valves and valve seals, and drains or bleeds? [68.28(b)(2)(ii)] ☐ Process vessel or pump releases due to cracks, seal failure, or drain, bleed, or plug failure? [68.28(b)(2)(iii)] ☐ Vessel overfilling and spill, or overpressurization and venting through relief valves or rupture disks? [68.28(b)(2)(iv)] ☐ Shipping container mishandling and breakage or puncturing leading to a spill? [68.28(b)(2)(v)]	☐ Y ☐ N ☐ N/A
21. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.28(c)]	☐ Y ☐ N ☐ N/A

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22. 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? [68.28(c)] What modeling technique did the owner or operator use? [68.25(g)] _____	☐ Y ☐ N ☐ N/A
23. Ensured that the passive and active mitigation systems, if considered, are capable of withstanding the release event triggering the scenario and will be functional? [68.28(d)]	☐ Y ☐ N ☐ N/A
24. Considered the following factors in selecting the alternative release scenarios: [68.28(e)] ☐ The five-year accident history provided in 68.42? [68.28(e)(1)] ☐ Failure scenarios identified under 68.50? [68.28(e)(2)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Defining off-site impacts–Population [68.30]

25. Estimated population that would be included within a circle where its center is the point of the release and a radius determined by the distance to the endpoint? [68.30(a)]	☐ Y ☐ N ☐ N/A
26. Identified the presence of institutions, parks and recreational areas, major commercial, office, and industrial buildings in the RMP? [68.30(b)]	☐ Y ☐ N ☐ N/A
27. Used most recent Census data, or other updated information to estimate the population? [68.30(c)]	☐ Y ☐ N ☐ N/A
28. Estimated the population to two significant digits? [68.30(d)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Defining off-site impacts–Environment [68.33]

29. Identified environmental receptors within a circle where its center is the point of the release and a radius determined by the distance to the endpoint? [68.33(a)]	☐ Y ☐ N ☐ N/A
30. Relied on information provided on local U.S.G.S. maps, or on any data source containing U.S.G.S. data to identify environmental receptors? [Source may have used LandView to obtain information] [68.33(b)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Review and update [68.36]

31. Reviewed and updated the off-site consequence analyses at least once every five years? [68.36(a)]	☐ Y ☐ N ☐ N/A
32. Completed a revised analysis and submit a revised RMP within six months of a change in processes, quantities stored or handled, or any other aspect that might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more? [68.36(b)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Documentation [68.39]

33. Has the owner or operator maintained the following records on the offsite consequence analyses:	
33.a For worst-case scenarios: a description of the vessel or pipeline and substance selected, assumptions and parameters used, the rationale for selection, and anticipated effect of the administrative controls and passive mitigation on the release quantity and rate? [68.39(a)]	☐ Y ☐ N ☐ N/A
33.b For alternative release scenarios: a description of the scenarios identified, assumptions and parameters used, the rationale for the selection of specific scenarios, and anticipated effect of the administrative controls and mitigation on the release quantity and rate? [68.39(b)]	☐ Y ☐ N ☐ N/A
33.c Documentation of estimated quantity released, release rate, and duration of release? [68.39(c)]	☐ Y ☐ N ☐ N/A
33.d Methodology used to determine distance to endpoints? [68.39(d)]	☐ Y ☐ N ☐ N/A

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33.e Data used to estimate population and environmental receptors potentially affected? [68.39(e)]	☐ Y ☐ N ☐ N/A
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Hazard Assessment: Five-year accident history [68.42]

34. 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)]	☐ Y ☐ N ☐ N/A
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35. Has the owner or operator reported the following information for each accidental release: [68.42(b)] ☐ Date, time, and approximate duration of the release? [68.42(b)(1)] ☐ Chemical(s) released? [68.42(b)(2)] ☐ Estimated quantity released in pounds and percentage weight in a mixture (toxics)? [68.42(b)(3)] ☐ NAICS code for the process? [68.42(b)(4)] ☐ The type of release event and its source? [68.42(b)(5)] ☐ Weather conditions (if known)? [68.42(b)(6)] ☐ On-site impacts? [68.42(b)(7)] ☐ Known offsite impacts? [68.42(b)(8)] ☐ Initiating event and contributing factors (if known)? [68.42(b)(9)] ☐ Whether offsite responders were notified (if known)? [68.42(b)(10)] ☐ Operational or process changes that resulted from investigation of the release? [68.42(b)(11)]	☐ Y ☐ N ☐ N/A
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Subpart C - Program 2 Prevention Program

Implemented the Program 2 prevention requirements as provided in 40 CFR 68.48 - 68.60?	☐ S ☐ M ☐ U ☐ N/A
Comments:	

Prevention Program: Safety information [68.48]

1. Compiled and maintained the following up-to-date safety information, related to the regulated substances, processes, and equipment: [68.48(a)] ☐ Safety Data Sheets (SDS) that meet the requirements of the OSHA Hazard Communication Standard [29 CFR 1910.1200(g)]? [68.48(a)(1)] ☐ Maximum intended inventory of equipment in which the regulated substances are stored or processed? [68.48(a)(2)] ☐ Safe upper and lower temperatures, pressures, flows, and compositions? [68.48(a)(3)] ☐ Equipment specifications? [68.48(a)(4)] ☐ Codes and standards used to design, build, and operate the process? [68.48(a)(5)]	☐ Y ☐ N ☐ N/A
2. Ensured the process is designed in compliance with recognized and generally accepted good engineering practices? [68.48(b)]	☐ Y ☐ N ☐ N/A
3. Updated information if a major change has occurred that made the information inaccurate? [68.48(c)]	☐ Y ☐ N ☐ N/A

Prevention Program: Hazard review [68.50]

4. Has the owner or operator conducted a review of the hazards associated with the regulated substances, processes, and procedures? [68.50(a)]	☐ Y ☐ N ☐ N/A
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5. Did the review identify: ☐ The hazards associated with the process and regulated substances? [68.50(a)(1)] ☐ Opportunities for equipment malfunctions or human errors that could cause an accidental release? [68.50(a)(2)] ☐ The safeguards used or needed to control the hazards or prevent equipment malfunctions or human error? [68.50(a)(3)] ☐ Any steps used or needed to detect or monitor releases? [68.50(a)(4)]	☐ Y ☐ N ☐ N/A
6. Determined by inspecting all equipment that the processes are designed, fabricated, and operated in accordance with applicable standards or rules, if designed to meet industry standards or Federal or state design rules? [68.50(b)]	☐ Y ☐ N ☐ N/A
7. Documented the results of the review? [68.50(c)]	☐ Y ☐ N ☐ N/A
8. Ensured that problems identified were resolved in a timely manner? [68.50(c)]	☐ Y ☐ N ☐ N/A
9. Updated the review at least once every five years or whenever a major change in the processes occurred? [68.50(d)]	☐ Y ☐ N ☐ N/A
10. Resolved all issues identified in the review before startup of the changed process? [68.50(d)]	☐ Y ☐ N ☐ N/A

Prevention Program: Operating procedures [68.52]

11. Has the owner or operator prepared written operating procedures that provide clear instructions or steps for safely conducting activities associated with each covered process consistent with the safety information for that process? (Operating procedures or instructions provided by equipment manufacturers or developed by persons or organizations knowledgeable about the process and equipment may be used as a basis for a stationary source's operating procedures.) [68.52(a)]	☐ Y ☐ N ☐ N/A
12. Do the procedures address the following: [68.52(b)] ☐ Initial startup? [68.52(b)(1)] ☐ Normal operations? [68.52(b)(2)] ☐ Temporary operations? [68.52(b)(3)] ☐ Emergency shutdown and operations? [68.52(b)(4)] ☐ Normal shutdown? [68.52(b)(5)] ☐ Startup following a normal or emergency shutdown or a major change that requires a hazard review? [68.52(b)(6)] ☐ Consequences of deviations and steps required to correct or avoid deviations? [68.52(b)(7)] ☐ Equipment inspections? [68.52(b)(8)]	☐ Y ☐ N ☐ N/A
13. Has the owner or operator ensured that the operating procedures have been updated, if necessary, whenever a major change occurred and prior to startup of the changed process? [68.52(c)]	☐ Y ☐ N ☐ N/A

Prevention Program: Training [68.54]

14. Ensured that each employee presently operating a process, and each employee newly assigned to a covered process have been trained or tested competent in the operating procedures provided in § 68.52 that pertain to their duties? (For those employees already operating a process on June 21, 1999, the owner or operator may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as provided in the operating procedures.) [68.54(a)]	☐ Y ☐ N ☐ N/A
15. Provided refresher training at least every three years, or more often if necessary, to each employee operating a process, to ensure that the employee understands and adheres to the current operating procedures of the process? [68.54(b)]	☐ Y ☐ N ☐ N/A

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16. Determined, in consultation with the employees operating the process, the appropriate frequency of refresher training? [68.54(b)]	☐ Y ☐ N ☐ N/A
17. Ensured that each employee was trained in any updated or new procedures prior to startup of a process after a major change? [68.54(d)]	☐ Y ☐ N ☐ N/A

Prevention Program: Maintenance [68.56]

18. Prepared and implemented procedures to maintain the on-going mechanical integrity of the process equipment? [68.56(a)]	☐ Y ☐ N ☐ N/A
19. Trained or caused to be trained each employee, involved in maintaining the on-going mechanical integrity of the process, in the hazards of the process, in how to avoid or correct unsafe conditions, and in the procedures applicable to the employee's job tasks? [68.56(b)]	☐ Y ☐ N ☐ N/A
20. Has every maintenance contractor ensured that each contract maintenance employee is trained to perform the maintenance procedures developed? [68.56(c)]	☐ Y ☐ N ☐ N/A
21. Has the owner or operator performed or caused to be performed inspections and tests on process equipment that follow recognized and generally accepted engineering practices? [68.56(d)]	☐ Y ☐ N ☐ N/A
22. Is the frequency of inspections and tests of process equipment consistent with applicable manufacturers' recommendations, industry standards or codes, good engineering practices, and prior operating experience? [68.56(d)]	☐ Y ☐ N ☐ N/A

Prevention Program: Compliance audits [68.58]

23. Has the owner or operator certified that compliance audits are conducted at least every three years to verify that the procedures and practices are adequate and are being followed? [68.58(a)]	☐ Y ☐ N ☐ N/A
24. Has compliance audit been conducted by at least one person knowledgeable in the process? [68.58(b)]	☐ Y ☐ N ☐ N/A
25. Has the owner operator developed a report of the audit findings? [68.58(c)]	☐ Y ☐ N ☐ N/A
26. Has the owner or operator promptly determined and documented an appropriate response to each of the findings of the audit and documented that deficiencies had been corrected? [68.58(d)]	☐ Y ☐ N ☐ N/A
27. Has the owner or operator retained the two most recent compliance audit reports, unless more than five years old? [68.58(e)]	☐ Y ☐ N ☐ N/A

Prevention Program: Incident investigation [68.60]

28. Has the owner or operator investigated each incident that resulted in, or could reasonably have resulted in a catastrophic release? [68.60(a)]	☐ Y ☐ N ☐ N/A
29. Were all incident investigations initiated not later than 48 hours following the incident? [68.60(b)]	☐ Y ☐ N ☐ N/A
30. Was an incident investigation team established and did the team consist of at least one person knowledgeable in the process involved and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident? [68.60(c)]	☐ Y ☐ N ☐ N/A
31. Was a report prepared at the conclusion of every investigation, which included: [68.60(d)] ☐ Date of incident? [68.60(d)(1)] ☐ Date investigation began? [68.60(d)(2)] ☐ A description of incident? [68.60(d)(3)] ☐ The factors that contributed to the incident? [68.60(d)(4)] ☐ Any recommendations resulting from the investigation? [68.60(d)(5)]	☐ Y ☐ N ☐ N/A

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Facility Name: _____

32. Has the owner or operator promptly addressed and resolved the investigation findings and recommendations, and are the resolutions and corrective actions documented? [68.60(e)]	☐ Y ☐ N ☐ N/A
33. Has the owner or operator reviewed the finding with all affected personnel whose job tasks are affected by the findings? [68.60(f)]	☐ Y ☐ N ☐ N/A
34. Has the owner or operator retained incident investigation reports for five years? [68.60(g)]	☐ Y ☐ N ☐ N/A

Subpart E - Emergency Response [68.90 - 68.96]

Developed and implemented an emergency response program as provided in 40 CFR 68.90-68.96? ☐S ☐M ☐U ☐N/A
Comments:

1. Is the facility designated as a “responding stationary source”? ☐Y ☐N ☐N/A

1.a. If the facility is **not** a responding stationary source, it need not comply with §68.95 if the following conditions are met:

1.a.(1) For stationary sources with any regulated substances held in a process above threshold quantities, is the source included in the community emergency response plan developed under 42 U.S.C. 11003? [68.90(b)(1)] ☐Y ☐N ☐N/A

1.a.(2) For stationary sources with only regulated flammable substances held in a process above threshold quantities, has the owner or operator coordinated response actions with the local fire department? [68.90(b)(2)] ☐Y ☐N ☐N/A

1.a.(3) Are appropriate mechanisms in place to notify emergency responders when there is need for a response? [68.90(b)(3)] ☐Y ☐N ☐N/A

1.a.(4) As of September 21, 2018, has the owner or operator performed the annual emergency response coordination activities required under § 68.93? [68.90(b)(4)] (See Items [2](#) through [5](#)) ☐Y ☐N ☐N/A

1.a.(5) Has the owner or operator performed the annual notification exercises required under § 68.96(a) before December 19, 2024? [68.90(b)(5)] (See Items [6](#) and [7](#)) ☐Y ☐N ☐N/A

For non-responding stationary sources where 1.a.(1)-(5) are all marked as ‘Y’, proceed to Subpart E Item [2](#)

1.b. If the facility is a responding stationary source:

1.b. (1) Has the owner or operator developed and implemented an emergency response program that includes the elements required in § 68.95(a)(1-4)? [68.95(a)] (See Items [1.b.\(2\)](#) – [1.b.\(5\)](#)) ☐Y ☐N ☐N/A

1.b. (2) An emergency response plan is maintained at the stationary source and contains the following: [68.95(a)(1)] ☐Y ☐N ☐N/A

- ☐ Procedures for informing the public and the appropriate Federal, state, and local emergency response agencies about accidental releases? [68.95(a)(1)(i)]
- ☐ Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures? [68.95(a)(1)(ii)]
- ☐ Procedures and measures for emergency response after an accidental release of a regulated substance? [68.95(a)(1)(iii)]

1.b.(3) Does the emergency response program contains procedures for the use of emergency response equipment and for its inspection, testing, and maintenance? [68.95(a)(2)] ☐Y ☐N ☐N/A

1.b.(4) Does the emergency response program include, training for all employees in relevant procedures? [68.95(a)(3)] ☐Y ☐N ☐N/A

1.b.(5) Does the emergency response program include procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes? [68.95(a)(4)] ☐Y ☐N ☐N/A

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1.b.(6) Does the emergency response program include a written plan that complies with other Federal contingency plan regulations or is consistent with the approach in the National Response Team's Integrated Contingency Plan Guidance ("One Plan")? If so, does the plan include the elements provided in paragraph (a) of 68.95, and also complies with paragraph (c) of 68.95? [68.95(b)]	☐ Y ☐ N ☐ N/A
1.b.(7) Has the emergency response plan been coordinated with the community emergency response plan developed under EPCRA? [68.95(c)]	☐ Y ☐ N ☐ N/A
1.b.(8) Has the owner or operator developed and implemented an exercise program for its emergency response program, including the emergency plan required under § 68.95(a)(1)? [68.96(b)]	☐ Y ☐ N ☐ N/A
1.b.(9) Do the exercises involve facility emergency response personnel and, as appropriate, emergency response contractors? [68.96(b)]	☐ Y ☐ N ☐ N/A
1.b.(10) When planning emergency response field and tabletop exercises, has the owner or operator coordinated with local public emergency response officials and invite them to participate in the exercise? [68.96(b)]	☐ Y ☐ N ☐ N/A
1.b.(11) Does the emergency response exercise program include: [68.96(b)] ☐ Emergency response field exercises? [68.96(b)(1)] ☐ Tabletop exercises? [68.96(b)(2)] ☐ Documentation? [68.96(b)(3)]	☐ Y ☐ N ☐ N/A
1.b.(12) As part of coordination with local emergency response officials, has the owner or operator consulted with these officials to establish an appropriate frequency for field exercises? [68.96(b)(1)(i)]	☐ Y ☐ N ☐ N/A
1.b.(13) Field exercises shall involve tests of the source's emergency response plan, including deployment of emergency response personnel and equipment. Do field exercises include: [68.96(b)(1)(ii)] ☐ Tests of procedures to notify the public and the appropriate Federal, state, and local emergency response agencies about an accidental release? ☐ Tests of procedures and measures for emergency response actions including evacuations and medical treatment? ☐ Tests of communications systems? ☐ Mobilization of facility emergency response personnel, including contractors, as appropriate? ☐ Coordination with local emergency responders? ☐ Emergency response equipment deployment? ☐ Any other action identified in the emergency response program, as appropriate?	☐ Y ☐ N ☐ N/A
1.b.(14) As part of coordination with local emergency response officials, has the owner or operator consulted with these officials to establish an appropriate frequency for tabletop exercises and conducted a tabletop exercise before December 21, 2026 and at a minimum of at least once every three years thereafter? [68.96(b)(2)(i)]	☐ Y ☐ N ☐ N/A

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1.b.(15) Tabletop exercises shall involve discussions of the source's emergency response plan. Do the exercises include discussions of: [68.96(b)(2)(ii)] ☐ Procedures to notify the public and the appropriate Federal, state, and local emergency response agencies? ☐ Procedures and measures for emergency response including evacuations and medical treatment? ☐ Identification of facility emergency response personnel and/or contractors and their responsibilities? ☐ Coordination with local emergency responders? ☐ Procedures for emergency response equipment deployment? ☐ Any other action identified in the emergency response plan, as appropriate?	☐ Y ☐ N ☐ N/A
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1.b.(16) Has the owner or operator prepared an evaluation report within 90 days of each field and tabletop exercise, which included: [68.96(b)(3)] ☐ A description of the exercise scenario? ☐ Names and organizations of each participant? ☐ An evaluation of the exercise results including lessons learned? ☐ Recommendations for improvement or revisions to the emergency response exercise program and emergency response program, and a schedule to promptly address and resolve recommendations?	☐ Y ☐ N ☐ N/A
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1.b.(17) Has the owner or operator satisfied the requirement to conduct notification, field and/or tabletop exercises through alternative means such as: [68.96(c)] ☐ Exercises conducted to meet other Federal, state, or local exercise requirements, provided the exercise meets the requirements of paragraphs (a) and/or (b) of this section, as appropriate? [68.96(c)(1)] ☐ Response to an accidental release, provided the response includes the actions indicated in paragraphs (a) and/or (b) of this section, as appropriate. When used to meet field and/or tabletop exercise requirements, the owner or operator shall prepare an after-action report comparable to the exercise evaluation report required in paragraph (b)(3) of this section, within 90 days of the incident? [68.96(c)(2)]	☐ Y ☐ N ☐ N/A
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For all responding and non-responding stationary sources:

2. Has the owner or operator of a stationary source coordinated response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance? [68.93(a)]	☐ Y ☐ N ☐ N/A
3. Has coordination occurred at least annually, and more frequently if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan? [68.93(a)]	☐ Y ☐ N ☐ N/A

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4. Has coordination included providing to the local emergency planning and response organizations? [68.93(b)] ☐ The stationary source's emergency response plan if one exists? ☐ Emergency action plan? ☐ Updated emergency contact information? ☐ Other information necessary for developing and implementing the local emergency response plan? ☐ Has the owner or operator requested an opportunity to meet with the local emergency planning committee (or equivalent) and/or local fire department to review and discuss those materials [68.93(b)] ☐ For responding stationary sources, has facility consulted with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under §68.96(b)? (See Items 1.b.(8) , 1.b.(10) , 1.b.(12) , and 1.b.(14))	☐ Y ☐ N ☐ N/A
5. As of September 21, 2018, has the owner or operator documented coordination with local authorities, including: [68.93(c)] ☐ The names of individuals involved and their contact information (phone number, email address, and organizational affiliations)? ☐ Dates of coordination activities? ☐ Nature of coordination activities?	☐ Y ☐ N ☐ N/A
6. Has the owner or operator of a stationary source with any Program 2 or Program 3 process conducted an exercise of the stationary source's emergency response notification mechanisms before December 19, 2024 and annually thereafter? [68.96(a)] (Owners or operators of responding stationary sources may perform the notification exercise as part of the tabletop and field exercises)	☐ Y ☐ N ☐ N/A
7. Has the owner/operator maintained a written record of each notification exercise conducted over the last five years? [68.96(a)]	☐ Y ☐ N ☐ N/A

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)] ☐ The name and CAS number of each regulated substance held above the threshold quantity in the process? ☐ The maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits? ☐ The five- or six-digit NAICS code that most closely corresponds to the process? ☐ The correct program level of the process?	☐ Y ☐ N ☐ N/A
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)]	☐ Y ☐ N ☐ N/A

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3. Does the owner or operator provide in the RMP: [68.180(a)] ☐ 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)] ☐ The date of the most recent coordination with the local emergency response organizations, pursuant to §68.93? [68.180(a)(2)] ☐ A list of Federal or state emergency plan requirements to which the stationary source is subject? [68.180(a)(3)]	☐ Y ☐ N ☐ N/A
4. For non-responding stationary sources, does the owner or operator identify: [68.180(b)(1)] ☐ For stationary sources with any regulated toxic substance held in a process above the threshold quantity, whether the stationary source is included in the community emergency response plan developed under 42 U.S.C. 11003, pursuant to §68.90(b)(1)? [68.180(b)(1)(i)] ☐ For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the date of the most recent coordination with the local fire department, pursuant to §68.90(b)(2)? [68.180(b)(1)(ii)] ☐ What mechanisms are in place to notify the public and emergency responders when there is a need for emergency response? [68.180(b)(1)(iii)] ☐ The date of the most recent notification exercise, as required in §68.96(a)? [68.180(b)(1)(iv)]	☐ Y ☐ N ☐ N/A
5. For responding stationary sources, does the owner or operator identify the date of the most recent: [68.180(b)(2)] ☐ Review and update of the emergency response plan, pursuant to §68.95(a)(4)? [68.180(b)(2)(i)] ☐ Notification exercise, as required in §68.96(a)? [68.180(b)(2)(ii)] ☐ Field exercise, as required in §68.96(b)(1)? [68.180(b)(2)(iii)] ☐ Tabletop exercise, as required in §68.96(b)(2)? [68.180(b)(2)(iv)]	☐ Y ☐ N ☐ N/A
6. Has the owner or operator reviewed and updated the RMP and submitted it to EPA for the following: [68.190(b)] ☐ Five-year update? [68.190(b)(1)] ☐ Within three years of a newly regulated substance listing? [68.190(b)(2)] ☐ At the time a new regulated substance is first present in an already regulated process above threshold quantities? [68.190(b)(3)] ☐ At the time a regulated substance is first present in a new process above threshold quantities? [68.190(b)(4)] ☐ Within six months of a change requiring revised PHA or hazard review? [68.190(b)(5)] ☐ Within six months of a change requiring a revised OCA as provided in 68.36? [68.190(b)(6)] ☐ Within six months of a change that alters the Program level that applies to any covered process? [68.190(b)(7)]	☐ Y ☐ N ☐ N/A
7. 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 was earlier? [68.195(a)]	☐ Y ☐ N ☐ N/A
8. 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 one month of the change? [68.195(b)]	☐ Y ☐ N ☐ 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: _____

1. Has the owner or operator maintained records supporting the implementation of this part at the stationary source for five years, unless otherwise provided in Subpart C-Prevention Program? [68.200]	☐ Y ☐ N ☐ 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)]	☐ Y ☐ N ☐ N/A