

# FLORIDA DIVISION OF EMERGENCY MANAGEMENT RISK MANAGEMENT PLANNING UNIT (RMP) RMP ON-SITE INSPECTION CHECKLIST

## INSPECTION CHECKLIST FOR PROGRAM LEVEL 2

## CHECK TYPE(S) APPLICABLE:

**LIST CHEMICALS AND PROGRAM LEVELS REPORTED IN RMP:**

CHEMICAL: \_\_\_\_\_ PROGRAM LEVEL 2  
 CHEMICAL: \_\_\_\_\_ PROGRAM LEVEL \_\_\_\_\_  
 CHEMICAL: \_\_\_\_\_ PROGRAM LEVEL \_\_\_\_\_  
 CHEMICAL: \_\_\_\_\_ PROGRAM LEVEL \_\_\_\_\_

X ON-SITE INSPECTION  
X ON-SITE DOCUMENTATION REVIEW  
X INTERVIEWS WITH FACILITY REPRESENTATIVES  
X INTERVIEWS WITH FACILITY EMPLOYEES

Owner/Operator Name: \_\_\_\_\_  
 Facility Name: \_\_\_\_\_  
 Street Address: \_\_\_\_\_  
 City, State, Zip: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 City, State, Zip: \_\_\_\_\_  
 RMP Contact Name: \_\_\_\_\_  
 Facility Phone #: \_\_\_\_\_  
 Email Address: \_\_\_\_\_

EPA Identifier # : \_\_\_\_\_  
 Notice of Inspection: \_\_\_\_\_  
 On-Site Inspection Date: \_\_\_\_\_  
 Inspection Team Leader: \_\_\_\_\_  
 Team Member: \_\_\_\_\_  
 Team Member: \_\_\_\_\_  
 Facility Representative: \_\_\_\_\_  
 Facility Representative: \_\_\_\_\_  
 Facility Representative: \_\_\_\_\_

**CHECKLIST KEY:**

- Y = YES indicates that the facility had documentation for the corresponding item at the time of inspection.
- N = NO indicates that the facility did not have documentation for the corresponding item at the time of inspection.
- P = PARTIAL indicates that the documentation was incomplete at the time of inspection.
- NA = NOT APPLICABLE indicates the documentation was not required or the item was not applicable to facility at time of inspection.
- NR = NOT REVIEWED at the time of inspection.
- UN = UNAVAILABLE indicates that the documentation was not available for review at the time of the inspection.
- ND = NOT DETERMINED indicates that the auditor is unable to determine or evaluate compliance of item at the time of the inspection.

<b>Management System 68.15</b>	
1	<ul style="list-style-type: none"> <li>• Management system to oversee the implementation of risk management program elements is developed and implemented. <b>68.15(a)</b></li> </ul>
2	<ul style="list-style-type: none"> <li>• A qualified person or position is assigned the overall responsibility of RMP development, implementation, and integration. <b>68.15(b)</b></li> </ul>
3	<ul style="list-style-type: none"> <li>• Other persons responsible for implementing individual requirements of the risk management program are documented and lines of authority are defined through an organizational chart. <b>68.15(c)</b></li> </ul>
<b>Hazard Assessment Documentation Review</b>	
<b>For worst-case release scenarios, has the owner/operator (o/o) maintained records of the following: 68.39(a)</b>	
4	<ul style="list-style-type: none"> <li>• A description of the vessel or pipeline and substance selected. <b>68.39(a)</b></li> </ul>
5	<ul style="list-style-type: none"> <li>• The assumptions and parameters used. <b>68.39(a)</b></li> </ul>
6	<ul style="list-style-type: none"> <li>• The rationale for selection of specific scenarios. <b>68.39(a)</b></li> </ul>
7	<ul style="list-style-type: none"> <li>• The anticipated effects of administrative controls and passive mitigation on the release quantity and rate. <b>68.39(a)</b></li> </ul>
<b>For alternative release scenarios, has the o/o maintained records of the following: 68.39(b)</b>	
8	<ul style="list-style-type: none"> <li>• A description of the scenarios identified. <b>68.39(b)</b></li> </ul>
9	<ul style="list-style-type: none"> <li>• The assumptions and parameters used. <b>68.39(b)</b></li> </ul>
10	<ul style="list-style-type: none"> <li>• The rationale for selection of specific scenarios. <b>68.39(b)</b></li> </ul>

<b>Hazard Assessment Documentation Review</b>	
11	<ul style="list-style-type: none"> <li>• The anticipated effects of the administrative controls and passive mitigation on the release quantity and rate. <b>68.39(b)</b></li> </ul>
<b>For all release scenarios, has the o/o maintained records of the following:</b>	
12	<ul style="list-style-type: none"> <li>• Documentation of estimated quantity released, release rate, and duration of release? <b>68.39(c)</b></li> </ul>
13	<ul style="list-style-type: none"> <li>• Methodology used to determine distance to endpoints. <b>68.39(d)</b></li> </ul>
14	<ul style="list-style-type: none"> <li>• Data used to estimate population and environmental receptors potentially affected. <b>68.39(e)</b></li> </ul>
<b>For defining off-site impacts, has the o/o:</b>	
15	<ul style="list-style-type: none"> <li>• Used most recent Census data, or other updated information to estimate the population. <b>68.30(c)</b></li> </ul>
16	<ul style="list-style-type: none"> <li>• 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. <b>68.33(b)</b></li> </ul>
<b>Has the o/o:</b>	
17	<ul style="list-style-type: none"> <li>• Completed 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. <b>68.36(b)</b></li> </ul>
18	<p><b>COMMENTS:</b></p>

Program Level 2 Prevention Program		
<b>Safety Program 68.48</b>		
	<b>The o/o has compiled and maintained the following up-to-date safety information, related to the regulated substances, processes, and equipment:</b>	<b>68.48</b>
19	• Material Safety Data Sheets (MSDSs) that meet the requirements of the OSHA Hazard Communication Standard [29 CFR 1910.1200(g)]. <b>68.48(a)(1)</b>	
20	• Maximum intended inventory of equipment in which the regulated substances are stored or processed. <b>68.48(a)(2)</b>	
21	• Safe upper and lower temperature, pressure, flows, and composition. <b>68.48(a)(3)</b>	
22	• Equipment specifications. <b>68.48(a)(4)</b>	
23	• Codes and standards used to design, build and operate the process(es). <b>68.48(a)(5)</b>	
24	• The o/o has ensured process is designed in compliance with recognized and generally accepted good engineering practices, industry codes and standards, or federal and state regulations that address safe design. <b>68.48(b)</b>	
25	• Safety information is updated if a major change occurs that makes the information inaccurate. <b>68.48(c)</b>	
26	<b>COMMENTS:</b>	
<b>Hazard Review 68.50</b>		
27	• A hazard review is conducted of the hazards associated with the regulated substances, processes, and procedures. <b>68.50(a)</b>	
	<b>The hazard review identifies the following:</b>	<b>68.50(a)</b>
28	• Hazards associated with the process and regulated substances. <b>68.50(a)(1)</b>	
29	• Opportunities for equipment malfunctions or human errors that could cause an accidental release. <b>68.50(a)(2)</b>	
30	• The safeguards used or needed to control hazards or prevent equipment malfunction or human error. <b>68.50(a)(3)</b>	
31	• Any steps used or needed to detect or monitor releases. <b>68.50(a)(4)</b>	
32	• The o/o determined (by inspecting all equipment) that the process is designed, fabricated, operated with applicable standards, rules, if designed to meet industry standards or federal or state design rules. <b>68.50(b)</b>	
33	• Results of hazard review are documented. <b>68.50(c)</b>	
34	• The o/o has ensured that problems identified by the hazard review are resolved in a timely manner. <b>68.50(c)</b>	
35	• The hazard review is updated at least once every five years. <b>68.50(d)</b>	
36	• The hazard review is updated whenever a major change in a process occurs <b>68.50(d)</b>	
37	• All issues identified in the hazard review are resolved before startup of a changed process. <b>68.50(d)</b>	
38	<b>COMMENTS:</b>	

Program Level 2 Prevention Program		
<b>Operating Procedures 68.52</b>		
39	• Written operating procedures are prepared that provide clear instructions or steps for safely conducting activities associated with each covered process consistent with the safety information for that process. <b>(NOTE: 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 facility's operating procedures.) 68.52(a)</b>	
	<b>Do the operating procedures include the following steps for each operating phase:</b>	<b>68.69(a)</b>
40	• Initial startup. <b>68.52(b)(1)</b>	
41	• Normal operations. <b>68.52(b)(2)</b>	
42	• Temporary operations. <b>68.52(b)(3)</b>	
43	• Emergency shutdown and operations. <b>68.52(b)(4)</b>	
44	• Normal shutdown. <b>68.52(b)(5)</b>	
45	• Startup following a normal or emergency shutdown or a major change that requires a hazard review. <b>68.52(b)(6)</b>	
46	• Consequences of deviations and steps required to correct or avoid deviations. <b>68.52(b)(7)</b>	
47	• Equipment inspections. <b>68.52(b)(8)</b>	
48	• The o/o has ensured that the operating procedures have been updated, if necessary, whenever a major change occurred and prior to the startup of the changed process. <b>68.52(c)</b>	
49	<b>COMMENTS:</b>	
<b>Training 68.54</b>		
50	• Employees involved in operating a process, and before being involved in operating a newly assigned process, have been trained or tested competent in the operating procedures provided in S. 68.52 that pertain to their duties. <b>68.54(a)</b>	
51	• Certified in writing that operation employees already operating a process on June 21, 1999 have the required knowledge, skills and abilities to safely carry out the duties and responsibilities as provided in the operating procedures. <b>(NOTE: S. 68.54(a) allows in lieu of initial training for employees already involved in operating a process on June 21, 1999, o/o may certify in writing the employee has required knowledge, skills, &amp; abilities to safely carry out the duties &amp; responsibilities as specified in the operating procedures). 68.54(a)</b>	
52	• Refresher training is provided at least once every three years, or more often if necessary, to each employee involved in operating a process. <b>68.54(b)</b>	
53	• The o/o, in consultation with the employees operating the process, determined the appropriate frequency of refresher training. <b>68.54(b)</b>	
54	• Operators are trained in any updated or new procedures prior to start up of the process after a major change. <b>68.54(d)</b>	
55	<b>COMMENTS:</b>	

<b>Program Level 2 Prevention Program</b>	
<b>Maintenance 68.56</b>	
56	<ul style="list-style-type: none"> <li>Written procedures to maintain the on-going mechanical integrity of process equipment are prepared and implemented. <b>68.56(a)</b></li> </ul>
57	<ul style="list-style-type: none"> <li>Employees involved in maintaining the on-going mechanical integrity of a process are trained 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. <b>68.56(b)</b></li> </ul>
58	<ul style="list-style-type: none"> <li>Every maintenance contractor has ensured that each contract maintenance employee is trained to perform the maintenance procedures developed under paragraph 68.56(a) of this section. <b>68.56(c)</b></li> </ul>
59	<ul style="list-style-type: none"> <li>Performed and performs inspections and tests on process equipment that follow recognized and generally accepted good engineering practices. <b>68.56(d)</b></li> </ul>
60	<b>COMMENTS:</b>
<b>Compliance Audits 68.58</b>	
61	<ul style="list-style-type: none"> <li>The o/o certified that they have conducted compliance audits at least every three years to verify that the procedures and practices are adequate and are being followed. <b>68.58(a)</b></li> </ul>
62	<ul style="list-style-type: none"> <li>Compliance audit(s) conducted by at least one person knowledgeable in the process. <b>68.58(b)</b></li> </ul>
63	<ul style="list-style-type: none"> <li>A report of audit findings is developed. <b>68.58(c)</b></li> </ul>
64	<ul style="list-style-type: none"> <li>Documentation of responses to each of the findings of compliance audit(s). <b>68.58(d)</b></li> </ul>
65	<ul style="list-style-type: none"> <li>The o/o has promptly developed and documented an appropriate response to each of the findings of the audit. <b>68.58(d)</b></li> </ul>
66	<ul style="list-style-type: none"> <li>Deficiencies have been corrected and documented. <b>68.58(d)</b></li> </ul>
67	<ul style="list-style-type: none"> <li>The two most recent compliance audit reports are retained (for 5 years). <b>68.58(e)</b></li> </ul>
68	<b>COMMENTS:</b>
<b>Incident Investigation 68.60</b>	
69	<ul style="list-style-type: none"> <li>Each incident which resulted in, or could reasonably have resulted in a catastrophic release has been investigated. <b>68.60(a)</b></li> </ul>
70	<ul style="list-style-type: none"> <li>Each incident investigation is initiated not later than 48 hours following the incident. <b>68.60(b)</b></li> </ul>
71	<ul style="list-style-type: none"> <li>A summary of the incident investigation is prepared and documented at the conclusion of each investigation. <b>68.60(c)</b></li> </ul>
	<b>The summary of the incident investigation includes the following information: 68.60(c)</b>
72	<ul style="list-style-type: none"> <li>Date of the incident. <b>68.60(c)(1)</b></li> </ul>
73	<ul style="list-style-type: none"> <li>Date investigation began. <b>68.60(c)(2)</b></li> </ul>
74	<ul style="list-style-type: none"> <li>A description of incident. <b>68.60(c)(3)</b></li> </ul>
75	<ul style="list-style-type: none"> <li>Factors that contributed to incident. <b>68.60(c)(4)</b></li> </ul>
76	<ul style="list-style-type: none"> <li>Any recommendations resulting from the investigation. <b>68.60(c)(5)</b></li> </ul>
77	<ul style="list-style-type: none"> <li>Investigation findings and recommendations are promptly addressed and resolved. Resolutions and corrective actions are documented. <b>68.60(d)</b></li> </ul>

<b>Program Level 2 Prevention Program</b>	
78	<ul style="list-style-type: none"> <li>Investigation findings are reviewed with all affected personnel whose job tasks are affected by the findings. <b>68.60(e)</b></li> </ul>
79	<ul style="list-style-type: none"> <li>Investigation summaries are retained for five years. <b>68.60(f)</b></li> </ul>
80	<b>COMMENTS:</b>
<b>Emergency Response 68.90</b>	
81	<ul style="list-style-type: none"> <li>Is facility a responding facility? If <b>N</b>, proceed to Items 82-84 under Non-Responding Facilities. If <b>Y</b>, proceed to Items 86-95 under Responding Facilities.</li> </ul>
<b>Non-Responding Facilities 68.90</b>	
82	<ul style="list-style-type: none"> <li>For <b>toxic</b> substances held above the TQ, the facility is included in the LEPC's community emergency response plan. <b>68.90(b)(1)</b></li> </ul>
83	<ul style="list-style-type: none"> <li>For <b>flammable</b> substances held above the TQ, facility has coordinated response actions with the local fire department. <b>68.90(b)(2)</b></li> </ul>
84	<ul style="list-style-type: none"> <li>Appropriate mechanisms are in place to notify emergency responders. <b>68.90(b)(3)</b></li> </ul>
85	<b>COMMENTS:</b>
<b>Responding Facilities 68.95</b>	
86	<ul style="list-style-type: none"> <li>An emergency response program is developed and implemented. <b>68.95(a)</b></li> </ul>
87	<ul style="list-style-type: none"> <li>An emergency response plan is maintained at the facility. <b>68.95(a)(1)</b></li> </ul>
88	<ul style="list-style-type: none"> <li>The emergency response plan addressed procedures for informing the public and local emergency response agencies about accidental releases. <b>68.95(a)(1)(i)</b></li> </ul>
89	<ul style="list-style-type: none"> <li>The emergency response plan addressed proper first aid and emergency medical treatment to treat human exposures. <b>68.95(a)(1)(ii)</b></li> </ul>
90	<ul style="list-style-type: none"> <li>The emergency response plan addressed procedures and measures for emergency response activities. <b>68.95(a)(1)(iii)</b></li> </ul>
91	<ul style="list-style-type: none"> <li>Procedures for use, inspection, testing, and maintenance of emergency response equipment are documented. <b>68.95(a)(2)</b></li> </ul>
92	<ul style="list-style-type: none"> <li>Employees are trained in relevant procedures. <b>68.95(a)(3)</b></li> </ul>
93	<ul style="list-style-type: none"> <li>The emergency response plan is reviewed and updated as appropriate. <b>68.95(a)(4)</b></li> </ul>
94	<ul style="list-style-type: none"> <li>The emergency response plan is coordinated with the LEPC's community emergency response plan. <b>68.95(c)</b></li> </ul>
95	<b>COMMENTS:</b>

**RMP Violations:**

**Suggested Improvement Areas:**