

**FLORIDA DEPARTMENT OF COMMUNITY AFFAIRS
BUREAU OF COMPLIANCE PLANNING AND SUPPORT
RISK MANAGEMENT PLANNING UNIT
RMP DOCUMENTATION REVIEW / ON-SITE AUDIT CHECKLIST**

AUDIT CHECKLIST FOR PROGRAM LEVEL 2 :LIST CHEMICALS AND PROGRAM LEVELS REPORTED IN RMP:

CHEMICAL : _____ PROGRAM LEVEL _____
 CHEMICAL : _____ PROGRAM LEVEL _____
 CHEMICAL : _____ PROGRAM LEVEL _____
 CHEMICAL : _____ PROGRAM LEVEL _____

Owner/Operator Name: _____
 Facility Name: _____
 Street Address: _____
 City, State, Zip: _____
 Mailing Address: _____
 City, State, Zip: _____
 RMP Contact Name: _____
 Facility Phone #: _____
 E:mail Address: _____

CHECK TYPE(S) OF AUDIT AS APPLICABLE:

_____ DESK AUDIT DOCUMENTATION REVIEW
 _____ ON-SITE AUDIT / INSPECTION
 _____ ON-SITE DOCUMENTATION REVIEW
 _____ INTERVIEWS WITH FACILITY REPRESENTATIVES
 _____ INTERVIEWS WITH FACILITY EMPLOYEES

EPA Identifier # : _____
 Notice of OS Audit Sent: _____
 On-Site Audit Date: _____
 Audit Team Leader: _____
 Audit Team Member: _____
 Audit 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 audit and/or inspection.

N = NO indicates that the facility did not have documentation for the corresponding item at the time of audit and/or inspection.

P = PARTIAL indicates that the documentation was incomplete at the time of audit and/or inspection.

NA = NOT APPLICABLE indicates the documentation was not required or the item was not applicable to facility at time of audit and/or inspection.

NR = NOT REVIEWED at the time of audit and/or inspection.

UN = UNAVAILABLE indicates that the documentation was not available for review at the time of the audit and/or inspection.

ND = NOT DETERMINED indicates that the auditor is unable to determine or evaluate compliance of item at the time of the audit and/or inspection.

Management System 68.15		
1	• Management system to oversee the implementation of risk management program elements is developed and implemented. 68.15(a)	
2	• A qualified person or position is assigned the overall responsibility of RMP development, implementation, and integration. 68.15(b)	
3	• Other persons responsible for implementing individual requirements of the risk management program are documented and lines of authority are defined through an organizational chart. 68.15(c)	
Hazard Assessment Documentation Review		
	For worst-case release scenarios, has the owner/operator (o/o) maintained records of the following:	68.39(a)
4	• A description of the vessel or pipeline and substance selected. 68.39(a)	
5	• The assumptions and parameters used. 68.39(a)	
6	• The rationale for selection of specific scenarios. 68.39(a)	
7	• The anticipated effects of administrative controls and passive mitigation on the release quantity and rate. 68.39(a)	
	For alternative release scenarios, has the o/o maintained records of the following:	68.39(b)
8	• A description of the scenarios identified. 68.39(b)	
9	• The assumptions and parameters used. 68.39(b)	
10	• The rationale for selection of specific scenarios. 68.39(b)	

Hazard Assessment Documentation Review		
11	• The anticipated effects of the administrative controls and passive mitigation on the release quantity and rate. 68.39(b)	
	For all release scenarios, has the o/o maintained records of the following:	
12	• Documentation of estimated quantity released, release rate, and duration of release? 68.39(c)	
13	• Methodology used to determine distance to endpoints. 68.39(d)	
14	• Data used to estimate population and environmental receptors potentially affected. 68.39(e)	
	For defining off-site impacts, has the o/o:	
15	• Used most recent Census data, or other updated information to estimate the population. 68.30(c)	
16	• 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. 68.33(b)	
	Has the o/o:	
17	• 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. 68.36(b)	
18	COMMENTS:	

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

Program Level 2 Prevention Program		
Operating Procedures 68.52		
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. (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)	
	Do the operating procedures include the following steps for each operating phase:	68.69(a)
40	• Initial startup. 68.52(b)(1)	
41	• Normal operations. 68.52(b)(2)	
42	• Temporary operations. 68.52(b)(3)	
43	• Emergency shutdown and operations. 68.52(b)(4)	
44	• Normal shutdown. 68.52(b)(5)	
45	• Startup following a normal or emergency shutdown or a major change that requires a hazard review. 68.52(b)(6)	
46	• Consequences of deviations and steps required to correct or avoid deviations. 68.52(b)(7)	
47	• Equipment inspections. 68.52(b)(8)	
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. 68.52(c)	
49	COMMENTS:	
Training 68.54		
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. 68.54(a)	
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. (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, & abilities to safely carry out the duties & responsibilities as specified in the operating procedures). 68.54(a)	
52	• Refresher training is provided at least once every three years, or more often if necessary, to each employee involved in operating a process. 68.54(b)	
53	• The o/o, in consultation with the employees operating the process, determined the appropriate frequency of refresher training. 68.54(b)	
54	• Operators are trained in any updated or new procedures prior to start up of the process after a major change. 68.54(d)	
55	COMMENTS:	

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

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