

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

INSPECTION CHECKLIST FOR PROGRAM LEVEL 3

CHECK TYPE(S) APPLICABLE:

LIST CHEMICALS AND PROGRAM LEVELS REPORTED IN RMP:

CHEMICAL: _____ PROGRAM LEVEL 3
 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.

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 3 Prevention Program		
Process Safety Information 68.65		
19	<ul style="list-style-type: none"> Has the o/o compiled written process safety information which includes information pertaining to the hazards of regulated substances, the technology and the equipment of the process before conducting any process hazards analysis (PHA) required by the rule. 68.65(a) 	
	<p>Does the process safety information contain the following for the hazards of substances: (NOTE: MSDSs may be used to comply with this requirement to the extent that they include the required information).</p>	68.65(b)
20	<ul style="list-style-type: none"> Toxicity information. 68.65(b)(1) 	
21	<ul style="list-style-type: none"> Permissible exposure limits. 68.65(b)(2) 	
22	<ul style="list-style-type: none"> Physical data. 68.65(b)(3) 	
23	<ul style="list-style-type: none"> Reactivity data. 68.65(b)(4) 	
24	<ul style="list-style-type: none"> Corrosivity data. 68.65(b)(5) 	
25	<ul style="list-style-type: none"> Thermal and chemical stability data. 68.65(b)(6) 	
26	<ul style="list-style-type: none"> Hazardous effects of inadvertent mixing of materials that could foreseeably occur. 68.65(b)(7) 	
	<p>Does the process safety information contain the following for technology of the process:</p>	68.65(c)(1)
27	<ul style="list-style-type: none"> A block flow diagram or simplified process flow diagram is prepared. 68.65(c)(1)(i) 	
28	<ul style="list-style-type: none"> Process chemistry is defined and documented. 68.65(c)(1)(ii) 	
29	<ul style="list-style-type: none"> Maximum intended inventory of regulated substances is documented. 68.65(c)(1)(iii) 	
30	<ul style="list-style-type: none"> Safe upper and lower limits of: temperature, pressure, flows, and composition, are documented. 68.65(c)(1)(iv) 	
31	<ul style="list-style-type: none"> Consequences of deviations from the above limits (point 6) are evaluated. 68.65(c)(1)(v) 	
	<p>Does the process safety information contain the following for equipment in the process:</p>	68.65(d)(1)
32	<ul style="list-style-type: none"> Equipment materials of construction. 68.65(d)(1)(i) 	
33	<ul style="list-style-type: none"> Piping and instrument diagrams. 68.65(d)(1)(ii) 	
34	<ul style="list-style-type: none"> Equipment electrical classification. 68.65(d)(1)(iii) 	
35	<ul style="list-style-type: none"> Relief system design and design basis. 68.65(d)(1)(iv) 	
36	<ul style="list-style-type: none"> Ventilation system design. 68.65(d)(1)(v) 	
37	<ul style="list-style-type: none"> Design codes and standards employed. 68.65(d)(1)(vi) 	
38	<ul style="list-style-type: none"> Material and energy balances for processes built after June 21, 1999. 68.65(d)(1)(vii) 	
39	<ul style="list-style-type: none"> Equipment safety systems (interlocks, detection or suppression systems) are documented. 68.65(d)(1)(viii) 	
	<p>Has the o/o determined and documented the following:</p>	68.65(d)(2) & (3)
40	<ul style="list-style-type: none"> Equipment complies with recognized and generally accepted good engineering practices. 68.65(d)(2) 	
41	<ul style="list-style-type: none"> For existing equipment that are designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested and operating in a safe manner. 68.65(d)(3) 	
42	COMMENTS:	

Program Level 3 Prevention Program		
Process Hazards Analysis 68.67		
43	<ul style="list-style-type: none"> An initial process hazard analysis (PHA) is performed not later than June 21, 1999. 68.67(a) 	
44	<ul style="list-style-type: none"> The PHA identifies, evaluates and controls each hazard involved in the process. 68.67(a)&(c) 	
45	<ul style="list-style-type: none"> Has the o/o determined and documented the priority order for conducting PHAs? 68.67(a) 	
	<p>Has the o/o used one or more of the following technologies for conducting PHAs?</p>	68.67(b)
46	<ul style="list-style-type: none"> What-If. 68.67(b)(1) 	
47	<ul style="list-style-type: none"> Checklist. 68.67(b)(2) 	
48	<ul style="list-style-type: none"> What-If/Checklist. 68.67(b)(3) 	
49	<ul style="list-style-type: none"> Hazard and Operability Study (HAZOP). 68.67(b)(4) 	
50	<ul style="list-style-type: none"> Failure Mode and Effects Analysis (FMEA). 68.67(b)(5) 	
51	<ul style="list-style-type: none"> Fault Tree Analysis. 68.67(b)(6) 	
52	<ul style="list-style-type: none"> An appropriate equivalent methodology. 68.67(b)(7) 	
	<p>Did the PHA address the following:</p>	68.67(c)
53	<ul style="list-style-type: none"> The hazards of the process. 68.67(c)(1) 	
54	<ul style="list-style-type: none"> Identification of any incident with potential for catastrophic consequences. 68.67(c)(2) 	
55	<ul style="list-style-type: none"> Identification of engineering and administrative controls applicable to the hazards (e.g. hazard detection methods). 68.67(c)(3) 	
56	<ul style="list-style-type: none"> Consequences of failure of engineering and administrative controls are documented. 68.67(c)(4) 	
57	<ul style="list-style-type: none"> Stationary source siting. 68.67(c)(5) 	
58	<ul style="list-style-type: none"> Human factors hazards are documented. 68.67(c)(6) 	
59	<ul style="list-style-type: none"> Qualitative evaluation of a range of possible safety and health effects in case of failure of controls is identified and documented. 68.67(c)(7) 	
60	<ul style="list-style-type: none"> The PHA is conducted by a team with expertise in engineering, process operations, and PHA methodology. 68.67(d) 	
61	<ul style="list-style-type: none"> The o/o has established a system to promptly address the team's findings & recommendations; assures that the recommendations are resolved in a timely manner & documented; documents what actions are to be taken; completes actions as soon as possible. 68.67(e) 	
62	<ul style="list-style-type: none"> Written schedule for actions required by the PHA is developed and implemented. 68.67(e) 	
63	<ul style="list-style-type: none"> Actions are communicated to operating, maintenance, and other affected employees. 68.67(e) 	
64	<ul style="list-style-type: none"> The PHA is updated and revalidated at least every five years after the initial PHA by a team meeting the requirements of item 8. 68.67(f) 	
65	<ul style="list-style-type: none"> The PHA documentation is retained for the life of the process. 68.67(g) 	
66	COMMENTS:	

Program Level 3 Prevention Program		
Operating Procedures 68.69		
67	<ul style="list-style-type: none"> Written operating procedures are developed and implemented that provide instructions or steps for conducting activities associated with each covered process consistent with the safety information. 68.69(a) 	
	Do the operating procedures include the following steps for each operating phase:	68.69(a)
68	<ul style="list-style-type: none"> Initial startup. 68.69(a)(1)(i) 	
69	<ul style="list-style-type: none"> Normal operations. 68.69(a)(1)(ii) 	
70	<ul style="list-style-type: none"> Temporary operations. 68.69(a)(1)(iii) 	
71	<ul style="list-style-type: none"> Emergency shutdown procedures. 68.69(a)(a)(iv) 	
72	<ul style="list-style-type: none"> Conditions under which emergency shutdown is required. 68.69(a)(1)(iv) 	
73	<ul style="list-style-type: none"> Assigns person(s) responsible for emergency shutdown to ensure emergency shutdown is executed in safe & timely manner. 68.69(a)(1)(iv) 	
74	<ul style="list-style-type: none"> Emergency operations. 68.69(a)(1)(v) 	
75	<ul style="list-style-type: none"> Normal shutdown. 68.69(a)(1)(vi) 	
76	<ul style="list-style-type: none"> Startup following a turnaround, or after emergency shutdown. 68.69(a)(1)(vii) 	
	Do the operating procedures address the following operating limits:	68.69(a)(2)
77	<ul style="list-style-type: none"> Consequences of deviation from operating limits. 68.69(a)(2)(i) 	
78	<ul style="list-style-type: none"> Steps required to avoid or correct deviations in operating limits. 68.69(a)(2)(ii) 	
	Do the operating procedures address the following safety and health considerations:	68.69(a)(3)
79	<ul style="list-style-type: none"> Properties of, and hazards presented by, the chemicals used in the process. 68.69(a)(3)(i) 	
80	<ul style="list-style-type: none"> Precautions necessary to prevent exposure (including engineering controls, administrative controls, personal protective equipment). 68.69(a)(3)(ii) 	
81	<ul style="list-style-type: none"> Control measures to be taken in case of physical contact or airborne exposure. 68.69(a)(3)(iii) 	
82	<ul style="list-style-type: none"> Quality control for raw materials and control of hazardous chemical inventory levels. 68.69(a)(3)(iv) 	
83	<ul style="list-style-type: none"> Any special or unique hazards. 68.69(a)(3)(v) 	
84	<ul style="list-style-type: none"> Safety systems and their functions. 68.69(a)(4) 	
85	<ul style="list-style-type: none"> Operating procedures are readily accessible to employees involved in each process. 68.69(b) 	
86	<ul style="list-style-type: none"> Annual certification that operating procedures are current and accurate and procedures have been reviewed as often as necessary. 68.69(c) 	
87	<ul style="list-style-type: none"> Safe work practices have been developed and implemented for control of hazards during specific operations (i.e., lockout/tagout, confined space entry, entrance/access procedures, opening process equipment/piping) for employees and contractor employees. 68.69(d) 	
88	COMMENTS:	
Training 68.71		
89	<ul style="list-style-type: none"> Employees presently involved in operating a process, and before being involved in operating a newly assigned process, are provided with initial training in an overview of the process and the operation procedures. 68.71(a)(1) 	
90	<ul style="list-style-type: none"> Initial training includes emphasis on safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks. 68.71(a)(1) 	

Program Level 3 Prevention Program		
Training 68.71		
91	<ul style="list-style-type: none"> Certified in writing that operation employees already operating a process on June 21, 1999 have the required knowledge, skills and abilities. (NOTE: S. 68.71(a)(2) allows in lieu of initial training for employees already involved in operating a process on 6/21/99, o/o may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures). 68.71(a)(2) 	
92	<ul style="list-style-type: none"> Refresher training provided at least once every 3 years or more often if necessary to each employee involved in operating a process. 68.71(b) 	
93	<ul style="list-style-type: none"> The o/o ascertained and documented in a record that each employee involved in operating a process has received & understood the training required. 68.71(c) 	
94	<ul style="list-style-type: none"> Training records contain: identity of employee, date of training, and the means used to verify that the employee understands the training. 68.71(c) 	
95	COMMENTS:	
Mechanical Integrity 68.73		
96	<ul style="list-style-type: none"> Written procedures to maintain the on-going mechanical integrity of process equipment are established and implemented. 68.73(b) 	
97	<ul style="list-style-type: none"> Employees involved in maintaining the on-going mechanical integrity of process equipment are trained in an overview of the process, its hazards, and job procedures. 68.73(c) 	
98	<ul style="list-style-type: none"> Performed inspections and tests on process equipment (pressure vessels, storage tanks, piping systems, relief valves, vent systems, emergency shutdown systems, controls, monitoring devices, alarms, pumps, etc.) 68.73(d)(1) 	
99	<ul style="list-style-type: none"> The o/o has followed recognized and generally accepted good engineering practices for inspection and testing procedures. 68.73(d)(2) 	
100	<ul style="list-style-type: none"> The o/o has ensured frequency of inspections & tests is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experiences. 68.73(d)(3) 	
101	<ul style="list-style-type: none"> Each inspection and test performed on process equipment is documented. 68.73(d)(4) 	
102	<ul style="list-style-type: none"> Documentation of inspections and tests includes: Date of inspection/test, person who performed inspection/test, serial number or identifier of equipment inspected/tested, description of inspection/test performed, and results of inspection/test. 68.73(d)(4) 	
103	<ul style="list-style-type: none"> Equipment deficiencies that were outside acceptable limits defined by the process safety information are corrected before further use or in a safe and timely manner when necessary means were taken to assure safe operation. 68.73(e) 	
104	<ul style="list-style-type: none"> Assured equipment, as fabricated, is suitable for the process application for which it will be used in the construction of new plants and equipment. 68.73(f)(1) 	
105	<ul style="list-style-type: none"> Performed appropriate checks and inspections to assure that equipment was installed properly and consistent with design specifications and the manufacturer's instructions. 68.73(f)(2) 	
106	<ul style="list-style-type: none"> Assured that maintenance materials, spare parts, & equipment were suitable for process application for which they would be used. 68.73(f)(3) 	
107	COMMENTS:	

Program Level 3 Prevention Program	
Management of Change 68.75	
108	<ul style="list-style-type: none"> Written procedures to manage changes to process chemicals, technology, equipment, and stationary sources that affect a covered process are established and implemented. 68.75(a)
Procedures assure that the following considerations are addressed prior to any changes: 68.75(b)	
109	<ul style="list-style-type: none"> Technical basis for proposed change. 68.75(b)(1)
110	<ul style="list-style-type: none"> Impact of change on safety & health. 68.75(b)(2)
111	<ul style="list-style-type: none"> Modifications to operating procedures. 68.75(b)(3)
112	<ul style="list-style-type: none"> Necessary time period for the change. 68.75(b)(4)
113	<ul style="list-style-type: none"> Authorization requirements for the proposed change. 68.75(b)(5)
114	<ul style="list-style-type: none"> Operation, maintenance and/or contract employees, whose job tasks would be affected by a change in the process, are informed of, and trained in, the change prior to start-up of the process of affected part of the process. 68.75(c)
115	<ul style="list-style-type: none"> If any change resulted in a change in process safety information, was such information updated accordingly. 68.75(d)
116	<ul style="list-style-type: none"> If any change resulted in a change in operating procedures or practices, had such procedures or practices been updated accordingly. 68.75(e)
117	COMMENTS:
Pre-Startup Review 68.77 (*NOTE: For new & modified stationary sources)	
118	<ul style="list-style-type: none"> Pre-startup review for new and/or modified stationary sources is performed when change or modification in a process was significant enough to require a change in process safety information. 68.77(a)
The pre-startup safety review confirmed the following conditions prior to the introduction of regulated substances to a process: 68.77(b)	
119	<ul style="list-style-type: none"> Construction and equipment is in accordance with design specifications. 68.77(b)(1)
120	<ul style="list-style-type: none"> Safety, operating, maintenance, and emergency procedures are in place and are adequate. 68.77(b)(2)
121	<ul style="list-style-type: none"> For new stationary sources, PHA has been performed and recommendations have been resolved/implemented prior to startup. 68.77(b)(3)
122	<ul style="list-style-type: none"> Modified stationary sources meet the requirements contained in management of change. 68.77(b)(3)
123	<ul style="list-style-type: none"> Training of each employee involved in operating a process had been completed. 68.77(b)(4)
124	COMMENTS:
Compliance Audits 68.79	
125	<ul style="list-style-type: none"> Certification provided that they have evaluated compliance with the provisions of the prevention program. 68.79(a)
126	<ul style="list-style-type: none"> Compliance audit has been conducted by at least one person knowledgeable in the applicable process. 68.79(b)
127	<ul style="list-style-type: none"> A report of audit findings is developed. 68.79(c)
128	<ul style="list-style-type: none"> Responses to audit findings have been determined and documented. 68.79(d)
129	<ul style="list-style-type: none"> Action on audit findings is taken and documented. Deficiencies have been corrected and corrections are documented. 68.79(d)
130	<ul style="list-style-type: none"> The two most recent compliance audit reports are retained. 68.79(e)
131	COMMENTS:

Program Level 3 Prevention Program	
Incident Investigation 68.81	
132	<ul style="list-style-type: none"> Each incident which resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance has been investigated. 68.81(a)
133	<ul style="list-style-type: none"> Each incident investigation is initiated not later than 48 hours following the incident. 68.81(b)
134	<ul style="list-style-type: none"> An incident investigation team has been established and consists of at least one person knowledgeable in the process involved, contractor employee (if applicable), and other persons with knowledge and experience in incident investigation. 68.81(c)
135	<ul style="list-style-type: none"> At conclusion of investigation, report is prepared. 68.81(d)
Each incident investigation report includes documentation of the following information: 68.81(d)	
136	<ul style="list-style-type: none"> Date of incident. 68.81(d)(1)
137	<ul style="list-style-type: none"> Date investigation began. 68.81(d)(2)
139	<ul style="list-style-type: none"> A Description of the incident. 68.81(d)(3)
140	<ul style="list-style-type: none"> Factors that contributed to incident. 68.81(d)(4)
141	<ul style="list-style-type: none"> Any recommendations resulting from the investigation. 68.81(d)(5)
142	<ul style="list-style-type: none"> A system to address and resolve the report findings and recommendations has been established and implemented. 68.81(e)
143	<ul style="list-style-type: none"> Resolutions and corrective actions are documented. 68.81(e)
144	<ul style="list-style-type: none"> Investigation report was reviewed with all affected personnel, whose job tasks are relevant to the incident findings. 68.81(f)
145	<ul style="list-style-type: none"> Investigation reports are retained for five years. 68.81(g)
146	COMMENTS:
Employee Participation 68.83	
147	<ul style="list-style-type: none"> Written plan of action regarding the implementation of employee participation is developed. 68.83(a)
148	<ul style="list-style-type: none"> Employees and their representatives are consulted on the conduct and development of PHAs and other elements of process safety management. 68.83(b)
149	<ul style="list-style-type: none"> Employees and their representatives are provided access to PHAs and to all other information required to be developed by 40 CFR, Part 68. 68.83(c)
150	COMMENTS:
Hot Work Permit 68.85	
151	<ul style="list-style-type: none"> Hot work permits are issued for each hot work operation conducted on or near a covered process. 68.85(a)
152	<ul style="list-style-type: none"> Hot work permits document that fire protection and prevention requirements in 29 CFR 1910.252(a) have been implemented prior to beginning hot work operations. 68.85(b)
153	<ul style="list-style-type: none"> Hot work permits indicate the date(s) authorized for hot work and identify the object on which hot works will be performed. 68.85(b)
154	<ul style="list-style-type: none"> Hot work permits are kept on file until completion of hot work operations. 68.85(b)
155	COMMENTS:

Program Level 3 Prevention Program	
Contractors 68.87	
156	• When selecting a contractor, information regarding contractor safety performance and programs is obtained and evaluated. 68.87(b)(1)
157	• Contractor is informed of all known potential fire, explosion or toxic release hazards related to the contractor's work and the process. 68.87(b)(2)
158	• Contractor is informed of facility emergency response activities and all applicable provisions of facility's emergency response plan. 68.87(b)(3)
159	• Safe work practices consistent with S. 68.69(d), procedures to control the entrance, presence, and exit, of contractor and contractor employees in covered process areas are developed and implemented. 68.87(b)(4)
160	• Contractor performance is periodically evaluated in fulfilling the obligations as specified in paragraph (c) of this section. 68.87(b)(5)
161	COMMENTS:
Emergency Response	
162	• Is facility a responding facility? If N , proceed to Items 162-165 under Non-Responding Facilities. If Y , proceed to Items 166-175 under Responding Facilities.
Non-Responding Facilities 68.90	
163	• For toxic substances held above the TQ, the facility is included in the LEPC's community emergency response plan. 68.90(b)(1)
164	• For flammable substances held above the TQ, facility has coordinated response actions with the local fire department. 68.90(b)(2)
165	• Appropriate mechanisms are in place to notify emergency responders. 68.90(b)(3)
166	COMMENTS:
Responding Facilities 68.95	
167	• An emergency response program is developed and implemented. 68.95(a)
168	• An emergency response plan is maintained at the facility. 68.95(a)(1)
169	• The emergency response plan addressed procedures for informing the public and local emergency response agencies about accidental releases. 68.95(a)(1)(i)
170	• The emergency response plan addressed proper first aid and emergency medical treatment to treat human exposures. 68.95(a)(1)(ii)
171	• The emergency response plan addressed procedures and measures for emergency response activities. 68.95(a)(1)(iii)
172	• Procedures for use, inspection, testing, and maintenance of emergency response equipment are documented. 68.95(a)(2)
173	• Employees are trained in relevant procedures. 68.95(a)(3)
174	• The emergency response plan is reviewed and updated as appropriate. 68.95(a)(4)
175	• The emergency response plan is coordinated with the LEPC's community emergency response plan. 68.95(c)
176	COMMENTS:

RMP Violations:**Suggested Improvement Areas:**