

Compliance Audit

for

Program 3 Facilities

Subpart D 68.79

Guidance and checklist for industry-specific risk management programs, as provided for by EPA.

Instructions: Review each question and record your findings by checking Yes, No or Not Applicable (N/A).

Facility: _____

Facility No. _____

Date of Audit: _____

Address: _____

RMP ID # _____ - _____ - _____

Team Members: _____

Which member of the audit team is knowledgeable about the process being audited? What qualifies this individual as being knowledgeable about the process being audited? (Specify years of process operation; supervision; education; training, etc.)

Regulated Process being audited:

- ☐ Aqua Ammonia Conversion and Storage
- ☐ Anhydrous Ammonia Storage and Transfer
- ☐ Ammonium Phosphate Reaction
- ☐ Dimethylamine
- ☐ Isopropylamine
- ☐ Glyphosate Production
- ☐ Other: _____

SECTION 1 – PRE-AUDIT ACTIVITIES

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The RMP document is available	☐	☐	☐	
2. The organization chart in the RMP document is current	☐	☐	☐	
3. There are no new processes using regulated substances in operation at the facility	☐	☐	☐	
4. Documentation exists to show that new processes are / are not RMP covered processes	☐	☐	☐	
5. Documentation exists that the RMP has been submitted to the U.S. EPA	☐	☐	☐	

SECTION 2 – PROCESS SAFETY INFORMATION

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The owner/operator completed gathering process safety information before conducting a Hazard Review.	☐	☐	☐	
2. A current Material Safety Data Sheet is available for each regulated substance in this process.	☐	☐	☐	
The documented safety information pertaining to hazards of the regulated substances consist of the following:				
3. Toxicity information	☐	☐	☐	
4. Permissible exposure limits	☐	☐	☐	
5. Physical data	☐	☐	☐	
6. Reactivity data	☐	☐	☐	

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
7. Corrosivity data	☐	☐	☐	
8. Thermal and chemical stability data	☐	☐	☐	
9. Hazardous effects on inadvertent mixing of different materials that could possibly occur	☐	☐	☐	
Does the documented information pertaining to the technology of the process include at least the following:				
10. A block flow diagram or process flow diagram	☐	☐	☐	
11. Description of Process chemistry	☐	☐	☐	
12. Maximum intended inventory of regulated substances	☐	☐	☐	
13. Safe upper and lower limits for such items as temperatures, pressures, flows and/or compositions	☐	☐	☐	
14. An evaluation of the consequences of deviations, including those affecting the safety and health of employees	☐	☐	☐	
The documented information pertaining to equipment in the process includes:				
15. Materials of construction	☐	☐	☐	
16. Piping and instrument diagrams (P&ID's) or flow diagrams	☐	☐	☐	
17. Electrical classification	☐	☐	☐	
18. Relief system design and design basis	☐	☐	☐	
19. Ventilation system design	☐	☐	☐	

Requirements	Yes	No	N/A	Findings
				(For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
20. Design codes and standards employed	☐	☐	☐	
21. Material and energy balances for systems built after May 26, 1992.	☐	☐	☐	
22. Safety systems (e.g., interlocks, detection or suppression systems)	☐	☐	☐	
23. The owner/operator has documentation that the equipment in the process complies with recognized and generally accepted good engineering practices.	☐	☐	☐	
24. The owner/operator has determined and documented that existing process equipment designed and constructed in accordance with codes, standards or practices no longer in general use that they are designed, maintained, inspected, tested and operating in a safe manner.	☐	☐	☐	

SECTION 3 – PROCESS HAZARD ANALYSIS (PHA)

Requirements	Yes	No	N/A	Findings
				(For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The owner/operator has conducted a review of the hazards associated with each covered process.	☐	☐	☐	
2. The hazard review team included at least one member knowledgeable with the covered process.	☐	☐	☐	
3. The hazard review team included at least one member knowledgeable with the specific hazard review methodology.	☐	☐	☐	
4. The hazard review team members were trained in the hazard review methodology.	☐	☐	☐	
The hazard review for each covered process identifies:				
5. The hazards associated with the process.	☐	☐	☐	

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.
6. The identification of any previous incidents that had a likely potential for catastrophic consequences.	☐	☐	☐	
7. Engineering and administrative controls applicable to the hazards.	☐	☐	☐	
8. Consequences of failure of engineering and administrative controls.	☐	☐	☐	
9. Stationary source siting.	☐	☐	☐	
10. Human factors.	☐	☐	☐	
11. Qualitative evaluation of possible safety and health effects of failures of controls.	☐	☐	☐	
12. External events including seismic events.	☐	☐	☐	
13. The results of the hazard review are documented.	☐	☐	☐	
14. Developed a written schedule of when recommendations from the hazard review are to be resolved.	☐	☐	☐	
15. Resolutions to the recommendations were documented.	☐	☐	☐	
16. The hazard review has been updated and revalidated within the previous 5 years.	☐	☐	☐	
17. The initial hazard review and subsequent updates are available.	☐	☐	☐	
18. Documented resolutions to all PHA recommendations are available.	☐	☐	☐	

SECTION 4 – OPERATING PROCEDURES

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The owner/operator developed and implemented written operating procedures.	☐	☐	☐	
The operating procedures address the following:				
2. Initial startup.	☐	☐	☐	
3. Normal operations.	☐	☐	☐	
4. Temporary operations.	☐	☐	☐	
5. Emergency shutdowns including the conditions when emergency shutdown is required.	☐	☐	☐	
6. Emergency operations.	☐	☐	☐	
7. Normal shutdown.	☐	☐	☐	
8. Start-up following a normal shutdown.	☐	☐	☐	
9. Start-up following an emergency shutdown.	☐	☐	☐	
10. Start-up following Management of Change procedures.	☐	☐	☐	
11. Consequences of process deviations.	☐	☐	☐	
12. The steps required to correct and avoid deviations.	☐	☐	☐	
Safety and health considerations:				
13. The properties of, and hazards presented by the chemicals used in the process.	☐	☐	☐	

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
14. The precautions necessary to prevent exposure, including engineering controls, administrative controls and personal protective equipment.	☐	☐	☐	
15. The control measures to be taken if physical contact or airborne exposure occurs.	☐	☐	☐	
16. The quality control for raw materials	☐	☐	☐	
17. The control of hazardous chemical inventory levels.	☐	☐	☐	
18. Any other special or unique hazards.	☐	☐	☐	
19. Safety systems and their functions	☐	☐	☐	
20. Operating procedures are readily accessible to employees who work in or maintain a process.	☐	☐	☐	
21. Operating procedures are reviewed periodically.	☐	☐	☐	
22. Operating procedures reflect current operating practices.	☐	☐	☐	
23. The owner/operator certifies annually that operating procedures are current and accurate.	☐	☐	☐	
24. The owner/operator developed Lockout/Tagout	☐	☐	☐	
25. Confined space entry.	☐	☐	☐	
26. Opening process equipment or piping.	☐	☐	☐	
27. The safe work practices include the control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel.	☐	☐	☐	
28. The safe work practices apply to employee and contractor employees.	☐	☐	☐	

SECTION 5 – TRAINING

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
Initial Training				
1. Each employee involved in operating a process has been trained in the process including the operating procedures	☐	☐	☐	
2. Employee training includes the safety and health hazards for the process they work in	☐	☐	☐	
3. Employee training includes the emergency operations for the process they work in	☐	☐	☐	
4. Employee training includes the safe work practices for the process they work in	☐	☐	☐	
5. Employees have been trained in the emergency response procedures for the process they work in	☐	☐	☐	
6. Employees have been trained on equipment maintenance for the process they work in	☐	☐	☐	
7. Employees have been trained how to avoid or correct unsafe conditions in the process they work in	☐	☐	☐	
Refresher Training				
8. Refresher training is provided at least every three years to each employee involved in operating a process	☐	☐	☐	
9. Is there documentation that the owner/operator consulted with employees involved in operating the process to determine the appropriate frequency of refresher training	☐	☐	☐	
Training Documentation				
10. Training records are available.	☐	☐	☐	

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
11. Records identify the employee who was trained	☐	☐	☐	
12. Records include the date of the training	☐	☐	☐	
13. Records include the training content	☐	☐	☐	
14. Records include the method(s) used to verify the employee understood the training	☐	☐	☐	

SECTION 6 – MECHANICAL INTEGRITY

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The owner/operator has written procedures to maintain the process equipment.	☐	☐	☐	
2. Maintenance activities are documented.	☐	☐	☐	
Inspections and Tests				
3. Inspections and tests are being performed on process equipment if required.	☐	☐	☐	
4. Inspection and test procedures follow recognized and generally accepted good engineering practices.	☐	☐	☐	
5. The frequency of inspections and tests are consistent with manufacturers' recommendations and good engineering practices.	☐	☐	☐	
6. The owner/operator documents inspections and tests performed on process equipment.	☐	☐	☐	
The documentation includes:				
7. The date of the inspection	☐	☐	☐	
8. The name of the person who performed the inspection or test.	☐	☐	☐	
9. The serial number, or other identifier, of the equipment on which the inspection or test was performed.	☐	☐	☐	
10. A description of the inspection or test performed.	☐	☐	☐	
11. The results of the inspection or test.	☐	☐	☐	

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
12. The owner/operator corrected deficiencies in equipment that was outside acceptable limits (defined in the process safety information) before further use or in a safe and timely manner when necessary means are taken to assure safe operation.	☐	☐	☐	
13. The owner/operator ensured that equipment in new plants is suitable for the process application for which it will be used.	☐	☐	☐	
14. Appropriate checks and inspections are performed to ensure equipment in new plants is installed properly and consistent with design specifications and the manufacturer's instructions.	☐	☐	☐	
15. The owner/operator ensures that maintenance materials, spare parts and equipment are suitable for the process application for which they will be used.	☐	☐	☐	

SECTION 7 – MANAGEMENT OF CHANGE

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The owner/operator has established and implemented written procedures to manage changes that occur in covered process	☐	☐	☐	
The procedures cover the following:				
2. The technical basis for the proposed change	☐	☐	☐	
3. The impact of change on safety and health	☐	☐	☐	
4. Modifications to the operating procedures	☐	☐	☐	
5. Necessary time period for the change	☐	☐	☐	
6. Authorization requirements for the proposed change	☐	☐	☐	

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
7. There is documentation that employees and contract employees are informed and trained in the process change prior to startup.	☐	☐	☐	
8. Process safety information has been updated as a result of the process change(s).	☐	☐	☐	
9. Operating procedures or safe work practices have been updated as a result of the process change(s).	☐	☐	☐	

SECTION 8 – PRE-STARTUP SAFETY REVIEW

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. A pre-startup safety review has been performed on new or modified processes	☐	☐	☐	
The pre-startup safety review confirmed the following:				
2. Construction and equipment is in accordance with design specifications	☐	☐	☐	
3. Safety, operating, maintenance and emergency response procedures exist and are adequate	☐	☐	☐	
4. For new covered processes a process hazard analysis has been performed.	☐	☐	☐	
5. Employee training on the modified process has been completed	☐	☐	☐	
6. For facilities that have been modified, Management of Change requirement has been met	☐	☐	☐	

SECTION 9 – COMPLIANCE AUDITS

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The owner/operator has certified that they evaluated their compliance against the RMP prevention program elements at least every three years	☐	☐	☐	
2. RMP compliance audit teams include at least one person knowledgeable in the process	☐	☐	☐	
3. A report of findings has been prepared for each RMP compliance audit	☐	☐	☐	
4. The owner/operator documented a response to each finding in the compliance audit	☐	☐	☐	
5. Documentation exists that the owner/operator addressed each finding	☐	☐	☐	
6. The two most recent compliance audits are available	☐	☐	☐	

SECTION 10 – INCIDENT INVESTIGATION

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The owner/operator has investigated each incident that resulted in, or could reasonably have resulted in a catastrophic release of regulated substances in the process	☐	☐	☐	
2. Incident investigations have been initiated no later than 48 hours following the incident	☐	☐	☐	
3. Incident investigation teams had at least one member knowledgeable in the process involved.	☐	☐	☐	
Incident investigation reports contain the following:				
4. The date of the incident	☐	☐	☐	
5. The date the investigation began	☐	☐	☐	

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
6. A description of the incident	☐	☐	☐	
7. The immediate and basic causes of the incident	☐	☐	☐	
8. Recommendation(s) to prevent recurrence	☐	☐	☐	
9. There is a procedure for the owner/operator to address and resolve the recommendations	☐	☐	☐	
10. Corrective actions are documented	☐	☐	☐	
11. The incident investigation reports are reviewed with all affected personnel, including contractors and contract employees, whose job tasks are relevant to the incident findings	☐	☐	☐	
12. Incident investigation reports are retained for five years	☐	☐	☐	

SECTION 11 – EMPLOYEE PARTICIPATION

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. There is a written employee participation plan.	☐	☐	☐	
2. Employees have been notified of right to access information developed for the RMP	☐	☐	☐	

SECTION 12 – HOT WORK PERMIT

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. There is a hot work permit program at the facility	☐	☐	☐	
2. There is documentation that hot work permits must be issued for hot work operations within areas of the covered process.	☐	☐	☐	
The hot work permit contains the following information:				
3. The date(s) that the permit authorizes hot work operations	☐	☐	☐	
4. An identity of the object that hot work is to be performed	☐	☐	☐	
5. Copies of hot work permits exist for hot work operations conducted in the covered process	☐	☐	☐	

SECTION 13 – CONTRACTORS

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. There is documentation that the owner/operator obtains and evaluates the safety performance of the contractor and contract employees.	☐	☐	☐	
2. There is documentation that the owner/operator informs the contractor of the potential fire, explosion or toxic release hazards in the covered process	☐	☐	☐	
3. There is documentation that the owner/operator explains the emergency response plan to the contractor.	☐	☐	☐	
4. There is documentation that the owner/operator has developed and implemented safe work practices to control the entrance, presence and exit of the contractor and contract employees within areas of the covered process.	☐	☐	☐	

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
5. There is documentation that the owner/operator has presented information on the obligations contractors must fill related to contract employee training, hazard instruction and training records.	☐	☐	☐	
6. There is evidence that the owner/operator periodically evaluates the contractor for fulfilling their obligations.	☐	☐	☐	
7. Does the facility maintain a contract employee Injury and Illness Log related to the contractors work in process areas?	☐	☐	☐	

SECTION 14 – EMERGENCY PLANS

Requirements	Yes	No	N/A	Findings (For explanations, comments, etc.) NOTE: A finding must be made for every check in the 'NO' column.)
1. The owner/operator has developed and implemented emergency plans to the release of each regulated substance.	☐	☐	☐	
Emergency procedures include the following:				
2. Procedures for informing and interfacing with the public and local emergency response agencies	☐	☐	☐	
3. Documentation of first-aid and emergency medical treatment	☐	☐	☐	
4. Procedures and measures for response after a release	☐	☐	☐	
5. Procedures for the use of emergency equipment and its inspection, testing and maintenance	☐	☐	☐	
6. Does Emergency Plan include procedures for handling small releases?	☐	☐	☐	
7. Does Emergency Plan address hazardous waste and the emergency response provisions of 1910.120 (p) & (q) if facility is subject to 1910.120.	☐	☐	☐	

FINDINGS AND CORRECTIVE ACTIONS

[illegible]

Record of Findings

IMPORTANT: Mark the statement that properly describes the results of this compliance audit or use the provided space to write in your own conclusion. Each person performing a compliance audit must form an opinion after completing this assessment and record their findings. Any deficiencies found as a result of performing the compliance audit must be corrected and documented on the Findings and Corrective Action page.

- _____ No deficiencies were found as the result of the compliance audit performed for this facility.
- _____ Deficiencies were found as the result of the compliance audit performed for this facility and have been corrected.
- _____ Deficiencies were found as the result of the compliance audit performed for this facility and will be corrected within _____ days.
- _____ Use this space for any other findings or conclusions: _____

Notes: _____

Certification

I am knowledgeable of the covered process and have to the best of my knowledge, information and belief performed, after reasonable inquiry, this compliance audit.

Printed Name: _____ (x) _____ Date Performed: _____
(Facility Representative) (Signature)

Printed Name: _____ (x) _____ Date Performed: _____
(Facility Representative) (Signature)

Printed Name: _____ (x) _____ Date Performed: _____
(Facility Representative) (Signature)