

Compliance Audit

for

Program 2 Facilities

Subpart C 68.48 - 68.60

Guidance and checklist for industry-specific risk management programs, as provided for by EPA. Refer to page 3 for the specific requirement for conducting compliance audits.

Instructions: Review each question and record your findings by circling Yes, No or Not Applicable (NA)

Business: _____

Address: _____

RMP ID#: _____ - _____ - _____

Regulated Substance(s):

- Anhydrous Ammonia
- Aqua Ammonia

#	SAFETY INFORMATION (68.48)	FINDING	CORRECTIVE ACTION REQUIRED
1	Is current safety information available at this facility for the regulated substance(s)?	Yes No	
2	Are current Material Safety Data Sheets (MSDS) available at this facility for the regulated substance(s)?	Yes No	
3	Has the maximum inventory of the regulated substance stored at this facility been defined?	Yes No	
4	Are established safe upper/lower temperatures, flows, pressures and compositions available at this site for the regulated substance(s)?	Yes No	
5	Are current equipment specifications available at this facility for use in handling regulated substance(s)?	Yes No	
6	Are the codes/standards used to design, build or operate the process available at this facility?	Yes No	
7	Has the facility been designed and constructed in accordance with industry-accepted engineering practices?	Yes No	
8	Is there a mechanism to update on a periodic basis, any changes to the RMP for this facility?	Yes No	
	HAZARD REVIEW (68.50)		
9	Has a hazard review been performed for the regulated substance(s), processes and procedures at this facility?	Yes No	
10	Did the hazard review identify the hazards associated with the process and regulated substance(s)?	Yes No	
11	Did the hazard review identify opportunities for equipment malfunctions or human error?	Yes No	
12	Did the hazard review identify the safeguards used or needed to control the hazards or prevent equipment malfunctions or human error?	Yes No	
13	Did the hazard review identify any steps used or needed to detect or monitor releases?	Yes No	
14	Has the operator of this facility inspected all equipment and determined it is operated in accordance with all applicable standards and rules?	Yes No	
15	Has the operator of this facility documented the results of the hazard review?	Yes No	
16	Is there a mechanism to insure that problems identified in an inspection are corrected in a timely manner?	Yes No	
17	Has the operator of this facility updated the inspection or review at least once every five years?	Yes No	
18	Have all issues identified in the hazard review been resolved prior to startup of the changed process?	Yes No	

#	OPERATING PROCEDURES (68.52)	FINDING	CORRECTIVE ACTION REQUIRED
19	Has the operator prepared written operating procedures that provide clear instructions or steps for safely conducting activities associated with each covered process? Operating procedures provided by equipment manufacturers or developed by organizations knowledgeable about the process and equipment may be used as a basis.	Yes No	
20	Does the written operating procedures address normal initial startup and shutdown?	Yes No	
21	Does the written operating procedures address normal operations?	Yes No	
22	Does the written operating procedures address temporary operations?	Yes No NA	
23	Does the written operating procedures address emergency shutdown and operations?	Yes No	
24	Does the written operating procedures address startup following a major change that requires a hazard review?	Yes No	
25	Does the written operating procedures address the consequences of deviations and steps required to correct or avoid deviations?	Yes No	
26	Does the written operating procedures address equipment inspections?	Yes No	
27	Is there a mechanism to insure the written operating procedures are updated?	Yes No	
	TRAINING (68.54)		
28	Has the operator of this facility provided training and tested to be competent each employee in operating a covered process?	Yes No	
29	Has the operator of this facility provided refresher training at least every three years?	Yes No	
30	Has the operator of this facility consulted with the employees to determine if the frequency of refresher training is appropriate?	Yes No	
31	Does the operator of this facility provide training and testing to be competent for each employee on any new or updated process?	Yes No	
	MAINTENANCE (68.56)		
32	Has the operator prepared and implemented written maintenance procedures for insuring the on-going mechanical integrity of the process equipment?	Yes No	
33	Has the operator of this facility provided training to those employees responsible for performing maintenance?	Yes No	
34	Has every contractor providing employees for the purpose of performing maintenance on process equipment been trained on the written maintenance procedures?	Yes No NA	
35	Has the operator of this facility inspected all equipment and determined it is maintained in accordance with all generally accepted engineering practices?	Yes No	
	COMPLIANCE AUDITS (68.58)		
36	Has the operator performed and certified a compliance audit has been performed at least every three years?	Yes No	
37	Has the compliance audit for this facility been conducted by a person knowledgeable of the process?	Yes No	
38	Has the person conducting the compliance audit generated a written report of the audit findings?	Yes No	

#	COMPLIANCE AUDITS (68.58) continued	FINDING	CORRECTIVE ACTION REQUIRED
39	Has the operator of this facility promptly determined and documented an appropriate response to each of the findings of this audit and documented that any deficiencies had been corrected?	Yes No	
40	Have the two most recent compliance audits and findings been maintained on file?	Yes No	
INCIDENT INVESTIGATION (68.60)			
41	Has the operator investigated each incident that resulted in, or could have resulted in an accidental release?	Yes No NA	
42	Were all incident investigations initiated within 48 hours following the incident?	Yes No NA	
43	Did the incident investigation include the date and description of the incident?	Yes No NA	
44	Did the incident investigation include the date the investigation of the incident began?	Yes No NA	
45	Did the incident investigation include the factors that contributed to the incident?	Yes No NA	
46	Did the incident investigation include any recommendations resulting from the investigation?	Yes No NA	
47	Has the operator of this facility promptly addressed any incident investigation findings or recommendations?	Yes No NA	
48	Has the investigation documentation been maintained on file at the facility?	Yes No NA	
49	Has the operator reviewed the findings with all affected personnel whose jobs are affected by the findings?	Yes No NA	
50	Has the operator maintained investigation summaries on file at this facility for five years?	Yes No NA	
51	Site-specific Question:	Yes No NA	
52	Site-specific Question:	Yes No NA	
53	Site-specific Question:	Yes No NA	
54	Site-specific Question:	Yes No NA	
55	Site-specific Question:	Yes No NA	

Compliance Audits 40 CFR 68.58 - (the rule)

- (a) The owner or operator shall certify that they have evaluated compliance with the provisions of this subpart at least every three years to verify that the procedures and practices developed under the rule are adequate and are being followed.
- (b) The compliance audit shall be conducted by at least one person knowledgeable in the process.
- (c) The owner or operator shall develop a report of the audit findings.
- (d) The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit and document that deficiencies have been corrected.
- (e) The owner or operator shall retain the two (2) most recent compliance audit reports. This requirement does not apply to any compliance audit report that is more than five years old.

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 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)