



On-Site Risk Management Audit Checklist for Program Level 2 Processes

Auditor name:	Date:
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I. Facility Information:

Facility name:	
Facility location:	
County:	RMP Facility I.D.
Contact name:	Phone Number:

II. Management for Program 2 processes (OAC 3745-104-07)

Has the owner or operator:	Yes / No / Comments
(A.) Developed a management system to oversee the implementation of the risk management program elements?	
(B.) Assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements?	
(C.) Documented other persons responsible for implementing individual requirements of the risk management program and defined the lines of authority through an organization chart or similar document?	

III. Hazard Assessment: Documentation (OAC 3745-104-15)

Has the owner or operator maintained the following records:	Yes / No / Comments
(A.) For worst-case scenarios, a description of the vessel or pipeline and substances selected as worst case, assumptions and parameters used, and the rationale for selection, and anticipated effect of the administrative controls and passive mitigation on the release quantity and rate?	
(B.) For alternative release scenarios, a description of the scenarios identified, assumptions and parameters used, the rationale for the selection of specific scenarios, and anticipated effective of the administrative controls and mitigation on the release quantity and rate?	
(C.) Documentation of estimated quantity released, release rate, and duration of release?	
(D.) Methodology used to determine distance to endpoints?	
(E.) Data used to estimate population and environmental receptors potentially affected?	

IV. Program 2 Prevention Program

OAC 3745-104-17: Safety Information	Yes / No / Comments
(A.) Has the owner or operator maintained the following up-to-date information related to the regulated substances, processes, and equipment:	
(1.) Material Safety Data Sheets (MSDS) that meet the requirements of the OSHA Hazard Communication Standard (29 CFR 1910.1200(g))?	
(2.) Maximum intended inventory or equipment in which the regulated substances are stored or processed?	
(3.) Safe upper and lower temperatures, pressures, flows, and compositions?	
(4.) Equipment specifications?	
(5.) Codes and standards used to design, build, and operate the process?	
(B.) Has the owner or operator ensured that the process is designed in compliance with recognized and generally accepted good engineering practices?	
(C.) Has the information been updated, if a major change has occurred that made the information inaccurate?	
OAC 3745-104-18: Hazard Review	Yes / No / Comments
(A.) Has the owner or operator conducted a review of the hazards associated with the regulated substances, processes and procedures? Did the review identify:	
(1.) The hazards associated with the process and regulated substances?	
(2.) Opportunities for equipment malfunctions or human errors that could cause an accidental release?	
(3.) The safeguards used or needed to control the hazards or prevent equipment malfunctions or human error?	
(4.) Any steps used or needed to detect or monitor releases?	
(B.) Has the owner or operator determined by inspecting all equipment that the processes are designed, fabricated, and operated in accordance with applicable standards or rules, if designed to meet industry standards or Federal or state design rules?	
(C.) Has the owner or operator documented the results of the review and ensured that problems were identified in a timely manner?	
(D.) Updated the review at least once every five years or whenever a major change in the process occurred? Resolved all issues identified in the review before startup of the changed process?	

OAC 3745-104-19: Operating Procedures	Comments
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<p>(A.) Has the owner or operator prepared written operating procedures 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 stationary source's operating procedures.</p>	
<p>(B.) Do the procedures address the following?</p>	
<p>(1.) Initial startup?</p>	
<p>(2.) Normal operations?</p>	
<p>(3.) Temporary operations?</p>	
<p>(4.) Emergency shutdown and operations?</p>	
<p>(5.) Normal shutdown?</p>	
<p>(6.) Startup following a normal or emergency shutdown or a major change that requires a hazard review?</p>	
<p>(7.) Consequences of deviations and steps required to correct or avoid deviations?</p>	
<p>(8.) Equipment inspections?</p>	
<p>(C.) Has the owner or operator ensured that the operating procedures are updated, whenever necessary, whenever a major change occurred and prior to startup of the changed process?</p>	
<p>OAC 3745-104-20: Training</p>	<p>Yes / No / Comments</p>
<p>(A.) Has the owner or operator ensured that each employee presently operating a process, and each employee newly assigned to a covered process have been trained or tested component in the operating procedures provided in OAC 3745-104-19? NOTE: For those employees already operating a process on June 21, 1999, the owner or operator may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as provided in the operating procedures.</p>	
<p>(B.) Has the owner or operator provided refresher training at least every three years, or more often if necessary, to each employee operating a process, to ensure that the employee understands and adheres to the current operating procedures of the process?</p>	
<p>(C.) Has the owner or operator determined, in consultation with the employees operating the process, the appropriate frequency of refresher training?</p>	
<p>(D.) Has the owner or operator certified that each employee was trained in any updated or new procedures prior to startup of a process after a major change?</p>	

<p>OAC 3745-104-21: Maintenance</p>	<p>Yes / No / Comments</p>
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(A.) Has the owner or operator prepared and implemented procedures to maintain on-going mechanical integrity of the process equipment? NOTE: The owner or operator may use procedures or instructions provided by covered process equipment vendors or procedures in federal or state regulations or industry codes as the basis for facility maintenance procedures.	
(B.) Has the owner or operator trained or caused to be trained each employee, involved in maintaining the on-going mechanical integrity of the process, 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?	
(C.) Has the owner or operator ensured that each contract maintenance employee is trained to perform the maintenance procedures developed?	
(D.) Has the owner or operator performed or caused to be performed inspections and tests on process equipment that follow recognized and generally accepted engineering practices?	
OAC 3745-104-22: Compliance Audits	Yes / No / Comments
(A.) Has the owner or operator certified that compliance audits are conducted at least every three years to verify that the procedures and practices are adequate and are being followed?	
(B.) Have compliance audits been conducted by at least one person knowledgeable in the process?	
(C.) Has the owner or operator developed a report of the audits findings?	
(D.) Has the owner or operator promptly determined and documented an appropriate response to each of the findings of the audit and documented that deficiencies have been corrected?	
(E.) Has the owner or operator retained the two most recent compliance audit reports, unless more than five years old?	
OAC 3745-104-23 Incident Investigation	Yes / No / Comments
(A.) Has the owner or operator investigated each incident which resulted in, or could reasonably have resulted in a catastrophic release?	
(B.) Were all incident investigations initiated not later than 48 hours following the incident?	
(C.) Was a summary prepared at the conclusion of every investigation, which included: (1.) date of incident; (2.) date investigation began; (3.) a description of the incident; (4.) factors that contributed to the incident; (5.) any recommendations resulting from the investigation?	
(D.) Has the owner or operator promptly addressed and resolved the investigation findings and recommendations, and are resolutions and corrective actions documented?	
(E.) Has the owner or operator reviewed the finding with all affected personnel whose job tasks are affected by the findings?	
(F.) Has the owner or operator retained investigation summaries for five years?	

V. Emergency Planning and Response

Emergency Response	Yes / No / Comments
3745-104-36: Applicability	
<p>(A.) Does the owner or operator of the facility intend for its employees to respond to accidental releases of the regulated substance? (If no, ask 3745-104-36(A)(1) through -36(A)(3), if "yes", ask 3745-104-37)</p> <p>(1.) Has the emergency response plan been coordinated with the community emergency response plan developed under 42 U.S.C. 11003?</p> <p>(2.) Has the emergency response plan been coordinated with the local fire department?</p> <p>(3.) Are there appropriate mechanisms in place to notify emergency responders in case of a release?</p>	
3745-104-37: Emergency Response Program	
<p>(A.) Does the owner or operator have a written emergency response plan?</p> <p>(1.) Does the written emergency response plan include:</p> <p>(a.) Procedures for informing the public and local emergency response agencies about releases?</p> <p>(b.) Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposure?</p> <p>(c.) Procedures and measures for emergency response after an accidental release of a regulated substance?</p>	
<p>(2.) Are there procedures for the use of emergency response equipment and for its inspection, testing, and maintenance?</p>	
<p>(3.) Is there training for all employees in relevant procedures?</p>	
<p>(4.) Procedures to review and update the emergency response plan to reflect changes?</p>	
<p>(B.) NOTE: Integrated Contingency Plan is acceptable for above.</p>	
<p>(C.) Has the emergency response plan been coordinated with the community emergency response plan developed under section 3750.05 of the Ohio Revised Code?</p>	