

Program Level 3 Compliance Audit Checklist

Process Safety Information

Date: _____

Team members and title:

Process Safety Information OAC 3745-104-24	Yes/No n/a	Comments
<p>(1) Does the information pertaining to the hazards of the regulated substance include:</p> <ul style="list-style-type: none"> ! toxicity information? ! permissible exposure limits? ! physical data? ! reactivity data? ! corrosivity data? ! thermal and chemical stability data? ! hazardous effects of inadvertent mixing of different materials that could foreseeable occur? <p><i>NOTE: MSDS's meeting the requirements of 29 CFR 1910.1200(g) may be used to extent they contain the information required.</i></p>		
<p>(2) Is information included concerning the technology of the process, and does it include at least:</p> <ul style="list-style-type: none"> ! a block flow diagram or simplified process flow diagram? ! process chemistry? ! maximum intended inventory? ! safe upper/lower limits including temperatures, pressures, flows or compositions? ! an evaluation of the consequences of deviations? <p><i>NOTE: Where the original technical information no longer exists, it may be developed in conjunction with the PHA.</i></p>		
<p>(3) Is information included pertaining to equipment in the process, and does it include at least:</p> <ul style="list-style-type: none"> ! materials of construction? ! piping and instrument diagrams? ! electrical classification? ! relief system design and design basis? ! ventilation system design? ! design codes and standards employed? ! material and energy balances for processes built after June 21, 1999? ! safety systems (e.g., interlocks, detection or suppression systems)? 		

(4) Has it been documented that process equipment complies with recognized and generally accepted good engineering practices? (Review the documentation for evidence that compliance with the appropriate consensus standards has been researched.)		
(5) Has it been determined and documented that existing equipment designed and constructed in accordance with codes, standards, or practices no longer in general use are designed, maintained, inspected, tested and operated in a safe manner?		

Process Hazard Analysis

Date: _____

Team members and title:

Process Hazard Analysis OAC 3745-104-25	Yes/No n/a	Comments
(1) Was an initial process hazard analysis (PHA) completed for subject processes by June 21, 1999? NOTE: Facilities subject to OSHA PSM may use the PHA completed to be in compliance with 29 CFR 1910.119(e).		
(2) Was the PHA appropriate for the complexity of the process and identify, evaluate, and control the hazards involved in the process?		
(3) Did the owner/operator determine and document a priority order for conducting initial PHA's based on a rationale that includes the extent of process hazards, number of potentially affected employees, age of the process, and operating history?		
(4) Does the hazard evaluation use one or more of the following PHA methodologies: ! What-If ! Checklist ! What-if/Checklist ! Hazard & Operability Study (HAZOP) ! Failure Mode and Effects Analysis (FMEA) ! Fault Tree Analysis (FTA) ! Other appropriate equivalent methodology		

<p>(5) Does the PHA address the following:</p> <ul style="list-style-type: none"> ! the hazards of the process? ! previous incidents with likely potential for catastrophic consequences? (i.e., potential injury, maximum release of hazardous materials, property damage, etc.) ! consequences of failure of engineering and administrative controls? ! stationary source siting? ! human factors? ! qualitative evaluation of a range of the possible safety and health effects of failure of controls? 		
<p>(6) Was the PHA performed by teams with expertise in engineering and process operations, including at least one employee with experience and knowledge specific to the process being evaluated and one member knowledgeable in the specific PHA methodology used?</p>		
<p>(7) Has a system been established to promptly address the team's findings and recommendations?</p>		
<p>(8) Review a representative sample of the documentation. Has the system been able to:</p> <ul style="list-style-type: none"> ! Assure that the recommendations are resolved and documented in a timely manner? ! Document actions to be taken? ! Complete actions as soon as possible? ! Develop a written schedule of when actions are to be completed? ! Communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions? 		
<p>(9) Are the PHA's updated and revalidated at least every five years by a qualified team to assure that the PHA is consistent with the current process?</p>		
<p>(10) Are all initial PHA's, updates or revalidations, and documented resolutions of recommendations kept for the life of the process?</p>		
<p>(11) Do observations of a representative sample of process-related equipment indicate that obvious hazards have been identified, evaluated, and controlled?</p>		
<p>(12) Do observations of a representative sample of process-related equipment indicate that PHA recommendations have been promptly resolved?</p>		

Operating Procedures

Date: _____

Team members and title:

Operating Procedures OAC 3745-104-26	Yes/No n/a	Comments
(1) Do written operating procedures exist for each covered process? Do the procedures provide clear instructions for conducting activities safely?		
(2) Do the operating instructions address, at a minimum, steps for each operating phase, including: ! initial startup? ! normal operations? ! temporary operations? ! emergency shutdowns? ! conditions requiring emergency shutdown? ! assignment of shutdown responsibility to qualified operators? ! emergency operations? ! normal shutdown? ! startups following a turnaround or emergency shutdown?		
(3) Do the operating procedures include operating limits that outline consequences of process deviation and steps required to correct or avoid deviations?		
(4) Have safety and health considerations been included in the operating procedures and include at minimum: ! properties of, and hazards presented by, the chemicals used in the process? ! precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment? ! control measures to be taken if physical contact or airborne exposure occurs? ! quality control for raw materials and control of hazardous chemical inventory levels? ! any special or unique hazards?		
(5) Are safety systems and their functions included in the operating procedures?		
(6) Are operating procedures readily accessible to employees who work in or maintain a process?		
(7) Do operating procedures reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources?		

(8) Have the operating procedures been certified annually that they are current and accurate?		
(9) Have safe work practices been developed and implemented for employees and contractors that provide for the control of hazards during operations and for the control over entrance into the facility by maintenance, contractor, laboratory, or other support personnel?		
(10) Does observation of a representative sample of processes indicate that the written operating procedures are being implemented?		
(11) Does observation of a representative sample of processes indicate that the written operating procedures are readily accessible to employees who work or maintain a process?		
(12) Does observation of a representative sample of processes indicate that operating procedures reflect current practice, including changes that result from process chemicals, technology, equipment, and facilities?		

Training

Date: _____

Team members and title:

Training OAC 3745-104-27	Yes/No n/a	Comments
(1) For employees involved in operating a process, do initial and refresher training records exist that include the following: ! identity of the employee? ! date of the training? ! means to verify that the employee understood the training?		
(2) Has each employee been trained before being involved in a newly assigned process (except employees involved in a operating a process prior to June 21, 1999)?		
(3) If initial training has not been given to employees involved in operating a process prior to June 21, 1999, is there written certification that they have the required knowledge, skills, and abilities to safely carry out the duties and responsibilities specified in the operating procedures? <i>Review the documents to make sure the certification has not been invalidated by a change in duties.</i>		

(4) Has each employee involved in operating a process been trained in an overview of the process and the operating procedures including: ! steps for each operating phase? ! initial startup, normal operations, temporary operations, emergency shutdown, emergency operations, normal shutdown, and startup following a turnaround or emergency shutdown? ! operating limits? ! consequences of deviations and steps required to avoid deviations? ! safety and health considerations? ! properties and hazards of chemicals used and precautions for preventing exposure? ! safety systems and their functions?		
(5) Has refresher training been provided to employees at least every three years (more often if necessary)?		
(6) Based on interviews with a representative number of employees, has their training emphasized specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to their tasks?		

Mechanical Integrity

Date: _____

Team members and title:

Mechanical Integrity OAC 3745-104-28	Yes/No n/a	Comments
(1) Does the written mechanical integrity program include: ! pressure vessels and storage tanks? ! piping systems (including piping components such as valves)? ! relief and vent systems and devices? ! emergency shutdown systems? ! controls (including monitoring devices and sensors, alarms, and interlocks)? ! pumps?		
(2) Are there written procedures to maintain the on-going integrity of process equipment? Does the documentation indicate the procedures have been implemented?		

<p>(3) Has training been provided to each employee involved in maintaining the on-going integrity of process equipment in the following:</p> <ul style="list-style-type: none"> ! an overview of the process and its hazards? ! procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner? <p><i>(Review certification documents for employees doing non-destructive tests, welding on pressure vessels, etc., where these certifications are required.)</i></p>		
<p>(4) Are inspections and tests performed on each item of process equipment included in the program?</p>		
<p>(5) Do inspection and testing procedures follow good engineering practices?</p>		
<p>(6) Are inspection and test frequencies consistent with the manufacturer's recommendation and good engineering practice? Are inspections and tests performed more frequently if determined necessary by operating experience?</p>		
<p>(7) Is there documentation of each inspection and test that has been performed including all of the following:</p> <ul style="list-style-type: none"> ! date of the inspection or test? ! name of person performing the procedure? ! serial number or other identifier of equipment on which procedure was performed? ! description of inspection or test performed? ! results of inspection or test? 		
<p>(8) Are deficiencies in equipment that are outside limits (as defined in the process safety information) corrected before further use or in a safe and timely manner when necessary means are taken to assure safe operation?</p>		
<p>(9) In the construction of new plants and equipment, does the employer assure that equipment as it is fabricated is suitable for the process for which it will be used?</p>		
<p>(10) Have appropriate checks and inspections been made to assure equipment is installed properly and consistent with design specifications and manufacturer's instructions?</p>		
<p>(11) Does the employer assure that maintenance materials, spare parts, and equipment are suitable for the process application for which they are used?</p>		

Management of Change

Date: _____

Team members and title:

Management of Change OAC 3745-104-29	Yes/No n/a	Comments
(1) Are there written procedures for managing change (except for “replacements in kind”) to process chemicals, technology, equipment, and procedures and changes to facilities that affect a covered process) <i>(Review procedures that address responsibilities, steps for assessing risks and approving changes, requirements for reviewing designs for temporary and permanent changes, steps needed to verify that modifications have been made as designed, variance procedures, time limit authorizations for temporary changes, and steps required to return the process to status quo after temporary changes.)</i>		
(2) Do the procedures assure that the technical basis for the proposed change is addressed prior to any change?		
(3) Do the procedures assure that the impact of the change on safety and health is addressed prior to any change?		
(4) Do the procedures assure that modifications to operating procedures are addressed prior to any change?		
(5) Do the procedures assure that the necessary time period for the change is addressed prior to any change?		
(6) Do the procedures assure that the authorization requirements for the proposed change are addressed prior to any change?		
(7) Are employees involved in operating a process, and maintenance and contract employees whose job tasks will be affected by change informed of, and trained in, the change prior to the start-up of process or affected part of process?		
(8) Is the process safety information updated if changed?		
(9) Are the operating procedures or practices updated if changed?		

Pre-Startup Safety Review

Date: _____

Team members and title:

Pre-Startup Safety Review OAC 3745-104-30	Yes/No n/a	Comments
(1) Has a pre-startup safety review been performed for all new facilities and for modified facilities when the modification is significant enough to require a change in process safety information?		
(2) Do pre-startup safety reviews confirm that prior to the introduction of regulated substances to a process: ! construction and equipment is in accordance with design specifications? ! Safety, operating, maintenance, and emergency procedures are in place and adequate? ! For new facilities, a PHA has been performed and recommendations resolved or implemented before startup? ! Modified facilities meet requirements of management of change? ! Training of each employee involved in operating the process has been completed.		
(3) Do observations of new or modified facilities indicate that prior to the introduction of the regulated substance: ! construction and equipment is in accordance with design specifications? ! safety, operating, maintenance, and emergency procedures are in place and adequate?		

Compliance Audits

Date: _____

Team members and title:

Compliance Audits OAC 3745-104-31	Yes/No n/a	Comments
(1) Has the owner/operator certified in writing that there has been an audit of compliance with RMP at least every three years?		
(2) Was the compliance audit conducted by at least one person who was knowledgeable in the process?		
(3) Has a report of the findings been developed for each audit?		

(4) Has the owner/operator promptly determined and documented an appropriate response to each of the findings?		
(5) Does the owner/operator document that deficiencies have been corrected?		
(6) Has the owner or operator retained the two most recent compliance audit reports?		

Incident Investigation

Date: _____

Team members and title:

Incident Investigation OAC 3745-104-32	Yes/No n/a	Comments
(1) Has each incident been investigated which resulted in, or could have reasonable resulted in a catastrophic release of a regulated substance?		
(2) Have incident investigations been initiated as promptly as possible, but not later than 48 hours following the incident?		
(3) Have incident investigation teams been established? Do the teams contain at least one person knowledgeable in the process involved in the incident, and other members with appropriate knowledge and experience to thoroughly investigate and analyze the incident? Has a contractor employee been included in the team if the incident involved work of the contractor?		
(4) Have incident investigation reports been prepared at the conclusion of the investigation which include at a minimum: ! date of the incident? ! date the inspection began? ! a description of the incident? ! the factors that contributed to the incident? ! any recommendations resulting from the investigation?		
(5) Has a system been established to promptly address and resolve the incident investigation report findings and recommendations?		
(6) Have resolutions and corrective actions from the incident investigation reports been documented?		
(7) Have incident investigation reports been reviewed with all affected employees whose job tasks are relevant to the incident findings including contract employees, where applicable?		
(8) Are incident investigation reports retained for five years?		

(9) Based on interviews with a representative number of operators, maintenance employees and contractor employees, have all incidents that resulted in or could reasonably have resulted in a catastrophic release of a regulated substance been investigated?		
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Employee Participation

Date: _____

Team members and title:

Employee Participation OAC 3745-104-33	Yes/No n/a	Comments
(1) Does a written program exist regarding employee participation?		
(2) Does the written program include consultation with employees and their representatives on the conduct and development of PHA's and on the development of other elements in the RMP regulation?		
(3) Does the written program provide employees and their representatives access to process hazard analyses and all other information developed as required by the RMP program?		
(4) Based on interviews with a representative number of employees and their representatives, have they been consulted on the conduct and development of the PHAs?		
(5) Based on interviews with a representative number of employees and their representatives, have they been consulted on the development of other elements of the RMP program?		
(6) Based on interviews with a representative number of employees and their representatives, have they been provided access to process hazard analyses and all other information required to be developed by the RMP program?		

Hot Work Permit

Date: _____

Team members and title:

Hot Work Permit OAC 3745-104-34	Yes/No n/a	Comments
(1) Have hot work permits been issued for all hot work operations conducted on or near a process covered by this standard?		
(2) Do the hot work permits indicate the date(s) authorized for hot work performed?		
(3) Do the hot work permits describe the object on which the hot work is to be performed?		
(4) Have the hot work permits been kept on file until the hot work operations were complete?		
(5) Have the hot work permits identified openings, cracks and holes where sparks may drop to combustible materials below?		
(6) Have the hot work permits described the fire extinguishers required to handle any emergencies?		
(7) Have the hot work permits assigned fire watchers whenever welding is performed in locations where other than a minor fire might develop?		
(8) Are the hot work permits being authorized, preferable in writing, by the "individual" responsible for all welding and cutting operations? Is authorization preceded by site inspection and designation of appropriate precautions?		
(9) Have the hot work permits described precautions associated with combustible materials on floors or floors, walls, partitions, ceilings or roofs of combustible construction?		
(10) Has hot work permitting been successful in prohibiting welding in unauthorized areas, in sprinklered buildings while such protection is impaired, in the presence of explosive atmospheres, and in storage areas for large quantities of readily ignitable materials?		
(11) Have the hot work permits required relocation of combustibles where practicable and covering with flameproofed covers where not practicable?		
(12) Have hot work permits identified for shutdown any ducts or conveyor systems that may convey sparks to distant combustibles?		
(13) Have hot work permits required precautions whenever welding on components (e.g., steel members, pipes, etc.) that could transmit heat by radiation or conduction to unobserved combustibles?		

(14) Have hot work permits identified hazards associated with welding on walls, partitions, ceilings or roofs with combustible coverings or welding on walls or panels of sandwich-type construction?		
(15) Has management established areas and procedures for safe welding and cutting based on fire potential?		
(16) Has management designated the "individual" responsible for authorizing cutting and welding operations in process areas?		
(17) Has management ensured that welders, cutters and supervisors are trained in the safe operation of their equipment?		
(18) Has management advised outside contractors working on their site about all hot work permitting programs?		
(19) Has the Supervisor determined if combustibles are being protected from ignition prior to welding by moving them, shielding them, or scheduling welding around their production?		
(20) Has the Supervisor, prior to welding, secured authorization from the responsible "individual" designated by management?		

Contractors

Date: _____

Team members and title:

Contractors OAC 3745-104-35	Yes/No n/a	Comments
<i>Employer's Program</i>		
(1) Does the program include all contractors performing maintenance or repair, turnaround, major renovation or specialty work on or adjacent to covered processes?		
(2) Is the information regarding the contractor's safety performance and program obtained and evaluated for selection of contractors?		
(3) Are the contract employers informed of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process?		
(4) Are contract employers informed of the applicable provisions of the emergency response plan as required by OAC 3745-104-36 and OAC 3745-104-37?		
(5) Have safe work practices to control the entrance, presence and exit of contract employers and contract employees in subject process areas been developed and implemented?		

<p>(6) Are contract employers evaluated for their performance in fulfilling their obligations to:</p> <ul style="list-style-type: none"> ! assure their employees are trained in safe work practices needed to perform the job? ! assured their employees are instructed in the known potential fire, explosion, or toxic release hazards related to the job and the applicable provision of the emergency response plan? ! document the required training and the means to verify their employees have understood the training? ! assure their employees follow the facility safety rules and work practices? ! advise the employer of unique hazards presented by the contractor's work? 		
<p>(7) Does the employer maintain a contract employee injury and illness log related to the contractor's work in process areas?</p>		
<p>Contractor's Programs</p>		
<p>(8) Are all contractor employees trained in the work practices necessary to perform their jobs safely?</p>		
<p>(9) Is each contract employee instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the processes and application provides of the emergency response plan?</p>		
<p>(10) Is there documentation that each contract employee has received and understands the required training?</p>		
<p>(11) Do the contract employee training records contain the following:</p> <ul style="list-style-type: none"> ! the identity of the employee? ! the date of the training? ! the means used to verify that the training was understood? 		
<p>(12) Are there means to assure that contract employees follow the safety rules of the facility, including safe work practices as required in OAC 3745-104-26?</p>		
<p>(13) Is the employer advised of any unique hazards presented by the contract employer's work or any hazards found by the contract employer's work?</p>		

Note: This document should not be used in place of the compliance audit report as required by OAC 3745-104-31. The owner or operator is required to retain the two most recent compliance audit reports.