

Region 6 - Enforcement & Compliance Assurance Division

Virtual Partial Compliance Evaluation Findings

Evaluation Date(s):	April 14, 2021 – May 11, 2021	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act Section 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Prevention – Risk Management Program (RMP)	
Company Name:	Targa Resources Corporation (Targa)	
Facility Name:	Gillis Gas Plant	
Facility Physical Location:	3807 Luke Powers Road	
(city, state, zip code)	Lake Charles, Louisiana 70615	
Mailing address:	811 Louisiana Street, Suite 2100	
(city, state, zip code)	Houston, Texas, 77002	
County/Parish:	Calcasieu Parish	
Facility Phone Number	(337) 583-5212	
Facility Contact:	Greg Stracner	Area Manager
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FRS Number:	110008377407	
Identification/Permit Number:	0520-00002-04	
Media Identifier Number:	1000 0001 6234 (EPA Facility Identifier)	
NAICS:	21112 Natural Gas Liquid Extraction	
SIC:	1311 Crude Petroleum and Natural Gas	
Personnel participating in evaluation:		
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Section I – INTRODUCTION

PURPOSE OF THE EVALUATION

On April 5, 2021, the United States Environmental Protection Agency (EPA) Region 6 sent an email to facility personnel at the Targa Resources Corporation Gillis Gas Plant, located in Lake Charles, Louisiana, to announce the initiation of a Clean Air Act Risk Management Plan (RMP) Virtual Partial Compliance Evaluation (VPCE). The e-mail informed Gillis Gas Plant personnel of the start of the VPCE which included a Microsoft Teams video opening conference scheduled on April 13, 2021. During the opening conference, Region 6 inspector Tony Robledo and Louisiana Department of Environmental Quality (LDEQ) inspectors virtually met with Greg Stracner and Gillis Gas Plant managers and staff via video conference. I presented my credentials and informed Gillis Gas Plant personnel that this was an EPA evaluation to determine compliance with the federal Chemical Accident Prevention Program. The scope of the VPCE was to evaluate the facility's compliance with the Clean Air Act (CAA) Section 112(r) and the Chemical Accident Prevention Provisions in 40 (C.F.R.) Part 68, as well as the General Duty Clause. I discussed general VPCE procedural questions, confidential business information (CBI) procedures, interview schedules, the proposed timeline, the exit conference, and the final report. This VPCE is a new compliance monitoring tool that EPA Region 6 is utilizing during the COVID-19 public health emergency. This evaluation included reviewing and obtaining copies of documents and records, conducting interviews, and taking verbal statements via video conference.

FACILITY DESCRIPTION

The Gillis Gas Plant is a natural gas liquids separation and gas processing plant. The plant is constructed to process approximately 180 MMSCFD (Million Standard Cubic Feet per Day) of natural gas. Entrained liquid gas is removed using offsite separators and then dehydrated using mole sieve beds in a continuous dehydration/regeneration cycle. The gas is then processed in the cryogenic plant. The methane gas from the demethanizer tower is routed to the sales pipeline. The recovered liquids are subsequently fractionated into ethane, propane, isobutene, normal butane, and natural gasoline. An amine system is used to remove carbon dioxide from the ethane before it goes into the pipeline. A refrigeration system using propane is provided for condensing ethane in the fractionation process. Residue gas is delivered to pipelines for distribution to customers. The natural gas liquids are delivered to pipelines for distribution to various customers and by transport truck to other area customers. The plant can also receive and store condensate from other facilities for outside sales. The Gillis facility is classified as a Program Level 3 RMP facility. The facility handles regulated chemical flammable mixtures in excess of the threshold amounts. The Gillis facility employs 27 full-time employees at this non-union plant, and operates 24 hours a day, seven days a week.

Section II – OBSERVATIONS

EPA Region 6 documented its observations on the Program Level 3 Checklist (**Appendix #1**).

Section III – AREAS OF CONCERN (AOC)

Closing Meeting – EPA convened a closing meeting via video conference on May 11, 2021, to discuss the Areas of Concern (AOC) noted during the VPCE and the evaluation report completion process, and to answer questions from Targa personnel. Targa provided a follow up written response dated June 2,

2021, with additional information and clarification regarding the areas of concern identified at the time of the VPCE.

AOC 1 - 40 C.F.R §68.67(e)

“The owner or operator shall establish a system to promptly address the team’s findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these 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.”

Targa failed to document in its 2020 PHA (Process Hazard Analysis) what timely actions were taken regarding four findings and recommendations from the rich amine regeneration system.

Targa in its written response noted that the due dates assigned in its action items list are inside of the two-year resolution timeframe set in its PHA procedure (Appendix 7, Chapter 4, page 6; Appendix 2). Targa further noted that the four open action items are from the 2020 PHA final report dated January 22, 2021, and the target date for closing these actions is August 1, 2021.

AOC 2 - 40 CFR §68.69(a)(1)(v)

“(a) The owner or operator failed to develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements. (1) steps for each operating phase for emergency operations. (v) Emergency Operations.”

Targa failed to document an emergency operations procedure.

Targa in its written response noted that it provided its existing emergency shutdown procedure during the VPCE. Targa also noted in its written response that the facility is not operated under emergency conditions, but rather it is shutdown following the emergency shutdown procedure and evacuation, if necessary. Targa also added that under certain emergency conditions, which require an emergency shutdown, activation of the emergency shutdown procedure is followed, and activation of the emergency evacuation procedures may also be necessary.

AOC 3 - 40 CFR §68.69(a)(1)(vi)

“(a) The owner or operator failed to develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements. (1) steps for each operating phase for emergency operations. (vi) Normal Shutdown.”

Targa failed to document a normal shutdown procedure.

Targa in its written response noted that it does document normal shutdown procedures, and inadvertently missed that the normal shutdown procedure was listed in the EPA records request. Targa provided its normal shutdown procedure dated May 2019 attached with its written response.

AOC 4 - 40 CFR §68.71(b)

“Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process.”

Targa failed to document 2019 refresher training for one operator based on a previous three- year refresher training conducted in 2016.

Targa noted in its written response that it did provide refresher training at least every three years in 2019, but unfortunately the folder paper documentation was believed to have been destroyed during Hurricane Laura. Targa further noted that to ensure that future extreme weather events do not affect Targa’s recordkeeping, records will be stored electronically.

AOC 5 - §68.73(d)(1)

“Inspection and test shall be performed on process equipment.”

The facility’s Testing Inspection Procedures for Pressure Vessels policy states, *“On-stream inspection shall consist of a visual external inspection supplemented with a metal thickness examination and/or appropriate NDE to assess the integrity of the equipment via measurement of the external surface metal thickness.”* Targa failed to perform the following inspections on covered process equipment in accordance with its inspection procedures and American Petroleum Institute (API) 510 Pressure Vessel Inspection Code: In-Service Inspection, Rating, Repair, and Alteration, Ninth Edition June 2006:

- an internal or on-stream in lieu of internal inspections on the West Propane Bullet;
- an internal or on-stream in lieu of internal inspections on the Regen Gas Scrubber; and,
- an internal or on-stream in lieu of internal inspections on the Fuel Gas Scrubber.

In its written response, Targa noted the following:

West Propane Bullet

Inspections were immediately scheduled and completed on April 27, 2021, when inspection deficiencies were discovered. On April 27, 2021, inspection data yielded a minimum calculated remaining life of 3.3 years, with the next API-510 Ultrasonic Thickness Testing (UTT) and external inspection date scheduled for April 27, 2023. An API inspector found the vessel to be “suitable for further service”, post the April 27, 2021, inspection recommending follow-up UTT within 1 year and an internal inspection to be performed “at the next opportune time”. Internal and advised follow-up UTT inspections are scheduled to be completed at the “next opportune time” during the facility turnaround in September 2021.

Regen Gas Scrubber

API-510 UTT: Testing completed on June 17, 2018, yielding a calculated minimum remaining life of 50.8 years. Per Targa’s Corporate Mechanical Integrity Plan and API-510, the next UTT testing is due on this vessel the lesser of every 10 years or ½ the calculated remaining life. Therefore, the next UTT testing is not due until June 17, 2028.

API-510 External Visual: Completed on June 17, 2018, with no issues identified. Per Targa’s Corporate

Mechanical Integrity Plan and API-510, the next External Visual Inspection is due on this vessel the lesser of every 5 years or ½ the calculated remaining life. Therefore, the next External Visual Inspection is not due until June 17, 2023.

API-510 Internal Inspection: API-510.6.6.2.1 states *“At the discretion of the inspector, an on-stream inspection may be substituted for the internal inspection in the following situations: a) when size or configuration makes vessel entry for internal inspection physically impossible.”* API-510 does not define what values of size or configuration make a vessel entry physically impossible. Targa’s Corporate Mechanical Integrity Plan states a vessel is considered “enterable” (accessible for internal inspection) if it has a Manway/Opening/Nozzle which size is 18” diameter or greater and a vessel inside diameter (ID) of 30” or greater. This vessel has an outside diameter of 24” and is considered not physically enterable, and therefore exempt per API-510.6.6.2.

Fuel Gas Scrubber

API-510 UTT and External Visual Inspections: Inspections were immediately scheduled and completed on April 27, 2021, when inspection deficiencies were discovered. April 27, 2021, inspection data yielded a minimum calculated remaining life of 85+ years. Previous low remaining life readings are attributed to incorrect previous, low thickness, UTT readings. Next Due API-510 UTT: April 27, 2031. Next Due API-510 External Visual Inspections: April 27, 2026.

API-510 Internal Inspection: API-510.6.6.2.1 states *“At the discretion of the inspector, an on-stream inspection may be substituted for the internal inspection in the following situations: a) when size or configuration makes vessel entry for internal inspection physically impossible.”* API-510 does not define what values of size or configuration make a vessel entry physically impossible. Targa’s Corporate Mechanical Integrity Plan states a vessel is considered “enterable” (accessible for internal inspection) if it has a Manway/Opening/Nozzle which size is 18” diameter or greater and a vessel ID of 30” or greater. This vessel has a nozzle size of 8” and an ID of 30”. This vessel is not physically enterable, and therefore exempt per API-510.6.6.2.

AOC 6 – §68.73(d)(3)

“Has the owner or operator ensured the frequency of inspections and tests of process equipment is consistent with applicable manufacturers’ recommendations, good engineering practices, and prior operating experience.”

Targa failed to follow inspection frequency for the following covered process equipment: Both Natural Gas Liquid (NGL) pumps (17.13 and 17.14) are scheduled for quarterly inspections according to the preventative maintenance plan, and both NGL pumps are missing one inspection report for the fourth quarter of 2019.

Targa in its written response noted that these documents were inadvertently left out of the original document request submitted prior to the VPCE, but included the fourth quarter of the 2019 NGL pump inspections attached with its written response.

AOC 7 – 40 CFR §68.75(e)

“If a change resulted in a change in the operating procedures or practices, had such procedures of practices been updated accordingly?”

Targa failed to update the procedure “Starting the Demethanizer Bottoms Pumps in Series” attached to Management of Change (MOC) GL-20-5-B until February 2021. The MOC was closed on June 5, 2020.

Targa noted in its written response that the training document attached to MOC GL-20-5-B stated that when the pumps are operated in series there would be no additional pressure concern on the Demethanizer make tank, which is located downstream of the pumps. Therefore, the Targa MOC committee decided that this change did not require a change to the operating procedure due to no additional pressure on the Demethanizer make tank and did not update the procedure. The MOC was then closed on June 5, 2020. However, Targa further noted that, separately, during the 2020 PHA revalidation, Targa’s PHA team recommended making a clarification in the wording of the procedure. The procedure was updated in February 2021 in response to the recommendation. The updated procedure states that the start command for both pumps would be initiated in sequence. Therefore, Targa acknowledges that there is a perceived discrepancy in the updated procedure date and the MOC closure date, but Targa still maintained compliance with the Risk Management Plan/Process Safety Management regulations for both MOC and PHAs.

AOC 8 – 40 CFR §68.77(b)(2)

“Safety, operating, maintenance, and emergency procedures are in place and are adequate.”

Targa failed to properly conduct a pre-start up safety review (PSSR). The procedure “Starting the Demethanizer Bottoms Pumps in Series” attached to MOC GL-20-5-B was not updated until February 2021. The PSSR was completed and approved on June 30, 2020. The box for “Are safety, operating, maintenance, and emergency procedures in place and adequate?” was checked yes, even though the procedure had not been updated at the time the PSSR was completed.

Targa noted in its written response that the PSSR was conducted properly, and adequate safety, operating, maintenance, and emergency procedures were in place at the time. The procedure was updated later following a recommendation from Targa’s PHA team during the 2020 PHA revalidation, and not per the MOC work process. The Targa’s PHA team recommendation does not invalidate or discredit the June 30, 2020 PSSR.

AOC 9 – 40 CFR §68.90(b)(2)

“For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the owner or operator has coordinated response actions with the local fire department.”

Targa failed to coordinate with the local fire department.

Targa in its written response stated that Targa is complying with the requirement to coordinate response actions with the local fire department. The Gillis Gas Plant Emergency Response Plan was mailed via certified mail to the Moss Bluff Fire Department on July 1, 2014. Targa provided the certified mail receipt attached to its response. Targa also noted that the LeBleu Settlement Fire Department attended a community event at the Targa Gillis Gas Plant in 2015. Targa further noted that it files annual Tier II electronic inventory reports using the Louisiana State Police Tier II Inventory filing website and that these hard copy Tier II reports are also sent to the local fire departments and the Local Emergency Planning Commission (LEPC), who are not accessing the state repository.

AOC 10 – 40 CFR 68.90(b)(4)

“The owner or operator performs the annual emergency response coordination activities required under §68.93.”

Targa failed to perform the annual coordination with local emergency planning and response organizations in 2019 and 2020.

Targa in its written response stated that it is complying with the requirement for annual coordination with local emergency planning and response organization requirements for 2019. Targa stated that it hand delivered the Gillis Gas Plant emergency response plan to the Calcasieu Parish LEPC. Targa acknowledged that the annual coordination requirements were not met in 2020, largely due to the disruption in its work processes due to COVID-19.

AOC 11 - §68.180(a)

“Emergency response program and exercises. (a) The owner or operator shall provide in the RMP: (1) Name, phone number and email address of local emergency planning and response organizations with which the stationary source last coordinated emergency response efforts, pursuant to §68.10(g)(3) or §68.93. (2) The date of the most recent coordination with the local emergency response organizations, pursuant to §68.93 and (3) A list of Federal or state emergency plan requirements to which the stationary source is subject. (b) The owner or operator shall identify in the RMP whether the facility is a responding stationary source or a non-responding stationary source, pursuant to §68.90. (1) For non-responding stationary sources, the owner or operator shall identify: (i) For stationary sources with any regulated toxic substance held in a process above the threshold quantity, whether the stationary source is included in the community emergency response plan developed under 42 U.S.C. 11003, pursuant to §68.90(b)(1); (ii) For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the date of the most recent coordination with the local fire department, pursuant to §68.90(b)(2); (iii) What mechanisms are in place to notify the public and emergency responders when there is a need for emergency response; and (iv) The date of the most recent notification exercise, as required in §68.96(a). (2) For responding stationary sources, the owner or operator shall identify: (i) The date of the most recent review and update of the emergency response plan, pursuant to §68.95(a)(4); (ii) The date of the most recent notification exercise, as required in §68.96(a); (iii) The date of the most recent field exercise, as required in §68.96(b)(1); and (iv) The date of the most recent tabletop exercise, as required in §68.96(b)(2).”

Targa failed to provide in its RMP:

- the name, phone number and email address of the local emergency planning and response organizations with which it last coordinated emergency response efforts;
- the date of the most recent coordination with the local emergency response organizations;
- a list of Federal or state emergency plan requirements to which the stationary source is subject;
- for stationary sources with only regulated flammable substances held in a process above the threshold quantity - the date of the most recent coordination with the local fire department;
- what mechanisms are in place to notify the public and emergency responders when there is a need for emergency response; and,
- the date of the most recent notification exercise.

Targa in its written response stated that it did update the information at issue during its last 5-year update, submitted on January 1, 2019, and further requested an explanation on how best to update the CDX submittal to include this information. Targa further noted that the CDX submittal will be updated in the next RMP renewal.

Section IV – FOLLOW UP

The facility is planning and scheduling corrective actions to include the implementation of an Inspection Data Management System (IDMS) to further enhance monitoring and scheduling of inspection activities coupled with mechanical integrity analytics.

Section V – LIST OF APPENDICES

Appendix #1 – RMP Program Level 3 Checklist

Inspection Symbol Key: Y - Yes, N - No, N/A - Not Applicable, S - Satisfactory, M - Marginal, U – Unsatisfactory.

Subpart A – General [68.10-15]

General requirements followed and implemented as in 40 CFR 68.10-15?

☐ S☐ M☐ U☐ N/A

Comments:

General: Applicability [68.10]

- | | |
|---|--|
| 1. Has the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115, complied with the requirements of this part no later than the latest of the following dates [68.10(a)]:

☐ June 21, 1999? [68.10(a)(1)];
☐ Three years after the date on which a regulated substance is first listed under §68.130? [68.10(a)(2)];
☐ The date on which a regulated substance is first present above a threshold quantity in a process? [68.10(a)(3)]; or
☐ For any revisions to this part, the effective date of the final rule that revises this part? [68.10(a)(4)] | ☐ Y ☐ N ☐ N/A |
| 2. Has the owner or operator complied with the emergency coordination activities in accordance with §68.93 by September 21, 2018? [68.10(b)] (See Items 2 through 5 of Subpart E) | ☐ Y ☐ N ☐ N/A |
| 3. Has the owner or operator developed and implemented an emergency response program in accordance with §68.95 within three years of when the owner or operator determined that the stationary source is subject to the emergency response program requirements of §68.95? [68.10(c)] (See Items 1.b.(2) – 1.b.(7) of Subpart E) | ☐ Y ☐ N ☐ N/A |
| 4. Has the owner or operator developed plans for conducting emergency response exercises in accordance with §68.96 by December 19, 2023? [68.10(d)] (See Items 1.b.(8) – 1.b.(17) , 6 , and 7 of Subpart E) | ☐ Y ☐ N ☐ N/A |
| 5. Has the owner or operator complied with the public meeting requirement in §68.210(b) within 90 days of any RMP reportable accident at the stationary source with known offsite impacts specified in §68.42(a), that occurs after March 15, 2021? [68.10(e)] (See Item 2 of Subpart H) | ☐ Y ☐ N ☐ N/A |
| 6. <u>After December 19, 2024</u> , has the owner or operator reported in the RMP submission: [68.10(f)]
☐ A public meeting after an RMP reportable accident under §68.160(b)(21)? [68.10(f)(1)];
☐ Emergency response program information under §68.180(a)(1)? [68.10(f)(2)];
☐ Emergency response program information under §68.180(a)(2) and (3)? [68.10(f)(3)]; and,
☐ Emergency response program and exercises information under §68.180(b), as applicable? Including submittal of the following: [68.10(f)(4)]
☐ Dates of the most recent notification,
☐ Dates of field and tabletop exercises in the risk management plan,
☐ Dates for exercises completed as required under §68.96 at the time the risk management plan is either submitted under §68.150(b)(2) or (3), or is updated under §68.190. | ☐ Y ☐ N ☐ N/A |

RMP Program Level 3 Process Checklist

Facility Name: _____

General: Program Eligibility [68.10(g)-(i)]

7. Does the covered process meet the eligibility requirements of Program 1? Specifically: [68.10(g)] Does the covered process meet all of the following requirements: ☐ For the five years prior to the submission of an RMP, the process has not had an accidental release of a regulated substance where exposure to the substance, its reaction products, overpressure generated by an explosion involving the substance, or radiant heat generated by a fire involving the substance led to any of the following offsite? [68.10(g)(1)]; ☐ Death; [68.10(g)(1)(i)] ☐ Injury; [68.10(g)(1)(ii)] or, ☐ Response or restoration activities for an exposure of an environmental receptor; [68.10(g)(1)(iii)] and ☐ The distance to a toxic or flammable endpoint for a worst-case release assessment conducted under subpart B and §68.25 is less than the distance to any public receptor, as defined in §68.3 [68.10(g)(2)]; and ☐ Emergency response procedures have been coordinated between the stationary source and local emergency planning and response organizations [68.10(g)(3)]	☐ Y ☐ N ☐ N/A
8. Does the covered process meet the eligibility requirements of Program 3? Specifically: [68.10(i)] ☐ The process does not meet the eligibility requirements of Program 1. [68.10(i)]; and Is the covered process any of the following NAICS codes: [68.10(i)(1)] ☐ 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532; or ☐ Is the process subject to the OSHA process safety management standard, 29 CFR 1910.119? [68.10(i)(2)]	☐ Y ☐ N ☐ N/A
9. Does the covered process fail to meet the eligibility requirements of Program 1 and Program 3 (i.e., is the covered process a Program 2)? [68.10(h)]	☐ Y ☐ N ☐ N/A

General: Management [68.15]

Has the owner or operator:

10. Developed a management system to oversee the implementation of the risk management program elements? [68.15(a)]	☐ Y ☐ N ☐ N/A
11. Assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements? [68.15(b)]	☐ Y ☐ N ☐ N/A
12. 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? [68.15(c)]	☐ Y ☐ N ☐ N/A

Subpart B - Hazard Assessment [68.20-68.42]

Hazard assessment conducted and documented as provided in 40 CFR 68.20-68.42? Comments:	☐ S ☐ M ☐ U ☐ N/A
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RMP Program Level 3 Process Checklist**Facility Name:** _____**Hazard Assessment: Offsite consequence analysis parameters [68.22]**

1. Used the following endpoints for offsite consequence analysis for a worst-case scenario: [68.22(a)] ☐ For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] ☐ For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)]; or ☐ For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] ☐ For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)]	☐ Y ☐ N ☐ N/A
2. Used the following endpoints for offsite consequence analysis for an alternative release scenario: [68.22(a)] ☐ For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] ☐ For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)] ☐ For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] ☐ For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)]	☐ Y ☐ N ☐ N/A
3. Used appropriate wind speeds and stability classes for the release analysis? [68.22(b)]	☐ Y ☐ N ☐ N/A
4. Used appropriate ambient temperature and humidity values for the release analysis? [68.22(c)]	☐ Y ☐ N ☐ N/A
5. Used appropriate values for the height of the release for the release analysis? [68.22(d)]	☐ Y ☐ N ☐ N/A
6. Used appropriate surface roughness values for the release analysis? [68.22(e)]	☐ Y ☐ N ☐ N/A
7. Do tables and models, used for dispersion analysis of toxic substances, appropriately account for dense or neutrally buoyant gases? [68.22(f)]	☐ Y ☐ N ☐ N/A
8. Were liquids, other than gases liquefied by refrigeration only, considered to be released at the highest daily maximum temperature, based on data for the previous three years appropriate for a stationary source, or at process temperature, whichever is higher? [68.22(g)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Worst-case release scenario analysis [68.25]

9. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated toxic substance from covered processes under worst-case conditions? [68.25(a)(2)(i)]	☐ Y ☐ N ☐ N/A
10. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated flammable substance from covered processes under worst-case conditions? [68.25(a)(2)(ii)]	☐ Y ☐ N ☐ N/A
11. Analyzed and reported in the RMP additional worst-case release scenarios for a hazard class if the worst-case release from another covered process at the stationary source potentially affects public receptors different from those potentially affected by the worst-case release scenario developed under 68.25(a)(2)(i) or 68.25(a)(2)(ii)? [68.25(a)(2)(iii)]	☐ Y ☐ N ☐ N/A
12. Has the owner or operator determined the worst-case release quantity to be the greater of the following: [68.25(b)] ☐ If released from a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity? [68.25(b)(1)] ☐ If released from a pipe, the greatest amount held in the pipe, taking into account administrative controls that limit the maximum quantity? [68.25(b)(2)]	☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist

Facility Name: _____

13.a. Has the owner or operator for toxic substances that are normally gases at ambient temperature and handled as a gas or liquid under pressure:

13.a.(1) Assumed the whole quantity in the vessel or pipe would be released as a gas over 10 minutes? [68.25(c)(1)] ☐ Y ☐ N ☐ N/A

13.a.(2) Assumed the release rate to be the total quantity divided by 10, if there are no passive mitigation systems in place? [68.25(c)(1)] ☐ Y ☐ N ☐ N/A

13.b. Has the owner or operator for toxic gases handled as refrigerated liquids at ambient pressure:

13.b.(1) Assumed the substance would be released as a gas in 10 minutes, if not contained by passive mitigation systems or if the contained pool would have a depth of 1 cm or less? [68.25(c)(2)(i)] ☐ Y ☐ N ☐ N/A

13.b.(2) If released substance would be contained by passive mitigation systems in a pool with a depth > 1 cm;
☐ Assumed the quantity in the vessel or pipe (as determined per 68.25(b)) would be spilled instantaneously to form a liquid pool? [68.25(c)(2)(ii)] ☐ Y ☐ N ☐ N/A
☐ Calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d)? [68.25(c)(2)(ii)]

13.c. Has the owner or operator for toxic substances that are normally liquids at ambient temperature:

13.c.(1) Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool? [68.25(d)(1)] ☐ Y ☐ N ☐ N/A

13.c.(2) Determined the surface area of the pool by assuming that the liquid spreads to 1 cm deep, if there is no passive mitigation system in place that would serve to contain the spill and limit the surface area, or if passive mitigation is in place, was the surface area of the contained liquid used to calculate the volatilization rate? [68.25(d)(1)(i)] ☐ Y ☐ N ☐ N/A

13.c.(3) Taken into account the actual surface characteristics, if the release would occur onto a surface that is not paved or smooth? [68.25(d)(1)(ii)] ☐ Y ☐ N ☐ N/A

13.c.(4) Determined the volatilization rate by accounting for the highest daily maximum temperature in the past three years, the temperature of the substance in the vessel, and the concentration of the substance if the liquid spilled is a mixture or solution? [68.25(d)(2)] ☐ Y ☐ N ☐ N/A

13.c.(5) Determined the rate of release to air from the volatilization rate of the liquid pool? [68.25(d)(3)] ☐ Y ☐ N ☐ N/A

13.c.(6) Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(d)(3)] ☐ Y ☐ N ☐ N/A

What modeling technique did the owner or operator use? [68.25(g)] _____

13.d. Has the owner or operator for flammable gases:

13.d.(1) Assumed the quantity in a vessel(s) of flammable gas held as a gas or liquid under pressure is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(1)] ☐ Y ☐ N ☐ N/A

13.d.(2) For gas handled as refrigerated liquid that is not contained by passive mitigation systems, assumed the total quantity in a vessel(s) of refrigerated liquid is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(2)(i)] ☐ Y ☐ N ☐ N/A

13.d.(3) For gas handled as refrigerated liquid released to a contained area, assumed the quantity volatilized in 10 minutes results in a vapor cloud? [68.25(e)(2)(ii)] ☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist**Facility Name:** _____

13.d.(4) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(e)]	☐ Y ☐ N ☐ N/A
13.e. Has the owner or operator for <u>flammable liquids</u> :	
13.e.(1) Assumed the entire quantity in the vessel or pipe, taking into account administrative controls that limit the maximum quantity, would be spilled instantaneously to form a liquid pool? [68.25(f)(1)]	☐ Y ☐ N ☐ N/A
13.e.(2) For liquids at temperatures below their atmospheric boiling point, calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d) and assumed that the quantity which becomes vapor in the first 10 minutes is involved in the vapor cloud explosion? [68.25(f)(1)-(2)]	☐ Y ☐ N ☐ N/A
13.e.(3) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(f)]	☐ Y ☐ N ☐ N/A
14. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.25(g)]	☐ Y ☐ N ☐ N/A
15. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(g)] What modeling technique did the owner or operator use? [68.25(g)] _____	☐ Y ☐ N ☐ N/A
16. Ensured that the passive mitigation system, if considered, is capable of withstanding the release event triggering the scenario and will still function as intended? [68.25(h)]	☐ Y ☐ N ☐ N/A
17. Considered also the following factors in selecting the worst-case release scenarios: [68.25(i)] ☐ Smaller quantities handled at higher process temperature or pressure? [68.25(i)(1)] ☐ Proximity to the boundary of the stationary source? [68.25(i)(2)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Alternative release scenario analysis [68.28]

18. Identified and analyzed at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes? [68.28(a)]	☐ Y ☐ N ☐ N/A
19. Selected a scenario: [68.28(b)] ☐ That is more likely to occur than the worst-case release scenario under 68.25? [68.28(b)(1)(i)] ☐ That will reach an endpoint off-site, unless no such scenario exists? [68.28(b)(1)(ii)]	☐ Y ☐ N ☐ N/A
20. Considered release scenarios which included, but are not limited to, the following: [68.28(b)(2)] ☐ Transfer hose releases due to splits or sudden hose uncoupling? [68.28(b)(2)(i)] ☐ Process piping releases from failures at flanges, joints, welds, valves and valve seals, and drains or bleeds? [68.28(b)(2)(ii)] ☐ Process vessel or pump releases due to cracks, seal failure, or drain, bleed, or plug failure? [68.28(b)(2)(iii)] ☐ Vessel overfilling and spill, or overpressurization and venting through relief valves or rupture disks? [68.28(b)(2)(iv)] ☐ Shipping container mishandling and breakage or puncturing leading to a spill? [68.28(b)(2)(v)]	☐ Y ☐ N ☐ N/A
21. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.28(c)]	☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist**Facility Name:** _____

22. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.28(c)] What modeling technique did the owner or operator use? [68.25(g)] _____	☐ Y ☐ N ☐ N/A
23. Ensured that the passive and active mitigation systems, if considered, are capable of withstanding the release event triggering the scenario and will be functional? [68.28(d)]	☐ Y ☐ N ☐ N/A
24. Considered the following factors in selecting the alternative release scenarios: [68.28(e)] ☐ The five-year accident history provided in 68.42? [68.28(e)(1)] ☐ Failure scenarios identified under 68.50? [68.28(e)(2)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Defining off-site impacts–Population [68.30]

25. Estimated population that would be included within a circle where its center is the point of the release and a radius determined by the distance to the endpoint? [68.30(a)]	☐ Y ☐ N ☐ N/A
26. Identified the presence of institutions, parks and recreational areas, major commercial, office, and industrial buildings in the RMP? [68.30(b)]	☐ Y ☐ N ☐ N/A
27. Used most recent Census data, or other updated information to estimate the population? [68.30(c)]	☐ Y ☐ N ☐ N/A
28. Estimated the population to two significant digits? [68.30(d)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Defining off-site impacts–Environment [68.33]

29. Identified environmental receptors within a circle where its center is the point of the release and a radius determined by the distance to the endpoint? [68.33(a)]	☐ Y ☐ N ☐ N/A
30. 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? [Source may have used LandView to obtain information] [68.33(b)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Review and update [68.36]

31. Reviewed and updated the off-site consequence analyses at least once every five years? [68.36(a)]	☐ Y ☐ N ☐ N/A
32. Completed a revised analysis and submit 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)]	☐ Y ☐ N ☐ N/A

Hazard Assessment: Documentation [68.39]

33. Has the owner or operator maintained the following records on the offsite consequence analyses:	
33.a For worst-case scenarios: a description of the vessel or pipeline and substance selected, assumptions and parameters used, the rationale for selection, and anticipated effect of the administrative controls and passive mitigation on the release quantity and rate? [68.39(a)]	☐ Y ☐ N ☐ N/A
33.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 effect of the administrative controls and mitigation on the release quantity and rate? [68.39(b)]	☐ Y ☐ N ☐ N/A
33.c Documentation of estimated quantity released, release rate, and duration of release? [68.39(c)]	☐ Y ☐ N ☐ N/A
33.d Methodology used to determine distance to endpoints? [68.39(d)]	☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist

Facility Name: _____

33.e Data used to estimate population and environmental receptors potentially affected? [68.39(e)]

☐ Y ☐ N ☐ N/A**Hazard Assessment: Five-year accident history [68.42]**

34. Has the owner or operator included all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage? [68.42(a)]

☐ Y ☐ N ☐ N/A

35. Has the owner or operator reported the following information for each accidental release: [68.42(b)]

☐ Y ☐ N ☐ N/A

- ☐ Date, time, and approximate duration of the release? [68.42(b)(1)]
- ☐ Chemical(s) released? [68.42(b)(2)]
- ☐ Estimated quantity released in pounds and percentage weight in a mixture (toxics)? [68.42(b)(3)]
- ☐ NAICS code for the process? [68.42(b)(4)]
- ☐ The type of release event and its source? [68.42(b)(5)]
- ☐ Weather conditions (if known)? [68.42(b)(6)]
- ☐ On-site impacts? [68.42(b)(7)]
- ☐ Known offsite impacts? [68.42(b)(8)]
- ☐ Initiating event and contributing factors (if known)? [68.42(b)(9)]
- ☐ Whether offsite responders were notified (if known)? [68.42(b)(10)]
- ☐ Operational or process changes that resulted from investigation of the release? [68.42(b)(11)]

Subpart D - Program 3 Prevention Program [68.65-68.87]

Implemented the Program 3 prevention requirements as provided in 40 CFR 68.48 - 68.60?

☐ S ☐ M ☐ U ☐ N/A

Comments:

Prevention Program: Process safety information [68.65]

1. Has the owner or operator compiled written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process, before conducting any process hazard analysis required by the rule? [68.65(a)]

☐ Y ☐ N ☐ N/A

Does the process safety information contain the following for hazards of the substances: [68.65(b)]

- ☐ Toxicity information? [68.65(b)(1)]
- ☐ Permissible exposure limits? [68.65(b)(2)]
- ☐ Physical data? [68.65(b)(3)]
- ☐ Reactivity data? [68.65(b)(4)]
- ☐ Corrosivity data? [68.65(b)(5)]
- ☐ Thermal and chemical stability data? [68.65(b)(6)]
- ☐ Hazardous effects of inadvertent mixing of materials that could foreseeably occur? [68.65(b)(7)]

Note: Safety Data Sheets (SDS) meeting the requirements of the OSHA Hazard Communication Standard [29 CFR 1910.1200(g)] may be used to comply with this requirement to the extent they contain the information required by 68.65(b).

RMP Program Level 3 Process Checklist**Facility Name:** _____

2. Does the process safety information contain information pertaining to technology of the process [68.65(c)]? Does the information concerning the technology of the process include the following: [68.65(c)(1)] ☐ A block flow diagram or simplified process flow diagram? [68.65(c)(1)(i)] ☐ Process chemistry? [68.65(c)(1)(ii)] ☐ Maximum intended inventory? [68.65(c)(1)(iii)] ☐ Safe upper and lower limits for such items as temperatures, pressures, flows, or compositions? [68.65(c)(1)(iv)] ☐ An evaluation of the consequences of deviation? [68.65(c)(1)(iv)]	☐ Y ☐ N ☐ N/A
3. Does the process safety information contain information pertaining to the equipment in the process? [68.65(d)] Does the information pertaining to the equipment in the process include the following: [68.65(d)(1)] ☐ Materials of construction? 68.65(d)(1)(i)] ☐ Piping and instrumentation diagrams [68.65(d)(1)(ii)] ☐ Electrical classification? [68.65(d)(1)(iii)] ☐ Relief system design and design basis? [68.65(d)(1)(iv)] ☐ Ventilation system design? [68.65(d)(1)(v)] ☐ Design codes and standards employed? [68.65(d)(1)(vi)] ☐ Material and energy balances for processes built after June 21, 1999? [68.65(d)(1)(vii)] ☐ Safety systems? [68.65(d)(1)(viii)]	☐ Y ☐ N ☐ N/A
4. Has the owner or operator documented that equipment complies with recognized and generally accepted good engineering practices? [68.65(d)(2)]	☐ Y ☐ N ☐ N/A
5. Has the owner or operator determined and documented that existing equipment, 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)]	☐ Y ☐ N ☐ N/A

Prevention Program: Process hazard analysis [68.67]

6. Has the owner or operator performed an initial process hazard analysis (PHA), and has this analysis identified, evaluated, and controlled the hazards involved in the process? [68.67(a)]	☐ Y ☐ N ☐ N/A
7. Has the owner or operator determined and documented the priority order for conducting PHAs, and was it based on an appropriate rationale? [68.67(a)]	☐ Y ☐ N ☐ N/A
8. Has the owner used one or more of the following technologies to conduct process PHA: [68.67(b)] ☐ What-if? [68.67(b)(1)] ☐ Checklist? [68.67(b)(2)] ☐ What-if/Checklist? [68.67(b)(3)] ☐ Hazard and Operability Study (HAZOP) [68.67(b)(4)] ☐ Failure Mode and Effects Analysis (FMEA) [68.67(b)(5)] ☐ Fault Tree Analysis? [68.67(b)(6)] ☐ An appropriate equivalent methodology? [68.67(b)(7)]	☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist**Facility Name:** _____

9. Did the PHA address: ☐ The hazards of the process? [68.67(c)(1)] ☐ Identification of any incident that had a likely potential for catastrophic consequences? [68.67(c)(2)] ☐ Engineering and administrative controls applicable to hazards and interrelationships?[68.67(c)(3)] ☐ Consequences of failure of engineering and administrative controls? [68.67(c)(4)] ☐ Stationary source siting? [68.67(c)(5)] ☐ Human factors? [68.67(c)(6)] ☐ A qualitative evaluation of a range of the possible safety and health effects of failure of controls? [68.67(c)(7)]	☐ Y ☐ N ☐ N/A
10. Was the PHA performed by a team with expertise in engineering and process operations and did the team include at least one employee who has experience and knowledge specific to the process being evaluated and at least one member of the team who is knowledgeable in the specific process hazard analysis methodology being used?? [68.67(d)]	☐ Y ☐ N ☐ N/A
11. Has the owner or operator completed the following: [68.67(e)] ☐ Established a system to promptly address the team's findings and recommendations? ☐ Assured that the recommendations are resolved in a timely manner and documented? ☐ Documented what actions are to be taken? ☐ Completed actions as soon as possible? ☐ Developed a written schedule of when these actions are to be completed? and ☐ Communicated the actions to operating, maintenance, and other employees whose work assignments are in the process and who may be affected by the recommendations?	☐ Y ☐ N ☐ N/A
12. Has the PHA been updated and revalidated by a team every five years after the completion of the initial PHA to assure that the PHA is consistent with the current process? [68.67(f)]	☐ Y ☐ N ☐ N/A
13. Has the owner or operator retained PHAs and updates or revalidations for each process covered, as well as the resolution of recommendations for the life of the process? [68.67(g)]	☐ Y ☐ N ☐ N/A

Prevention Program: Operating procedures [68.69]

14. Has the owner or operator developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process consistent with the safety information? [68.69(a)]	☐ Y ☐ N ☐ N/A
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RMP Program Level 3 Process Checklist**Facility Name:** _____

15. Do the procedures address the following: [68.69(a)] <u>Steps for each operating phase: [68.69(a)(1)]</u> ☐ Initial Startup? [68.69(a)(1)(i)] ☐ Normal operations? [68.69(a)(1)(ii)] ☐ Temporary operations? [68.69(a)(1)(iii)] ☐ Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner? [68.69(a)(1)(iv)] ☐ Emergency operations? [68.69(a)(1)(v)] ☐ Normal shutdown? [68.69(a)(1)(vi)] ☐ Startup following a turnaround, or after emergency shutdown? [68.69(a)(1)(vii)] <u>Operating limits: [68.69(a)(2)]</u> ☐ Consequences of deviations [68.69(a)(2)(i)] ☐ Steps required to correct or avoid deviation? [68.69(a)(2)(ii)] <u>Safety and health considerations: [68.69(a)(3)]</u> ☐ Properties of, and physical hazards presented by, the chemicals used in the process [68.69(a)(3)(i)] ☐ Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment? [68.69(a)(3)(ii)] ☐ Control measures to be taken if physical contact or airborne exposure occurs? [68.69(a)(3)(iii)] ☐ Quality control for raw materials and control of hazardous chemical inventory levels? [68.69(a)(3)(iv)] ☐ Any special or unique hazards? [68.69(a)(3)(v)] ☐ <u>Safety systems and their functions? [68.69(a)(4)]</u>	☐Y ☐N ☐N/A
16. Are operating procedures readily accessible to employees who are involved in a process? [68.69(b)]	☐Y ☐N ☐N/A
17. Has the owner or operator certified annually that the operating procedures are current and accurate and that procedures have been reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources? [68.69(c)]	☐Y ☐N ☐N/A
18. Has the owner or operator developed and implemented safe work practices to provide for the control of hazards during specific operations, such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel? [68.69(d)]	☐Y ☐N ☐N/A
Prevention Program: Training [68.71]	
19. Has each employee involved in operating a process, and each employee before being involved in operating a newly assigned process, been initially trained in an overview of the process and in the operating procedures? [68.71(a)(1)]	☐Y ☐N ☐N/A
20. Did initial training include 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)]	☐Y ☐N ☐N/A
21. In lieu of initial training for those employees already involved in operating a process on June 21, 1999, an 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 specified in the operating procedures [68.71(a)(2)]	☐Y ☐N ☐N/A

RMP Program Level 3 Process Checklist**Facility Name:** _____

22. Has refresher training been provided at least every three years, or more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process? [68.71(b)]	☐ Y ☐ N ☐ N/A
23. Has owner or operator ascertained and documented in record that each employee involved in operating a process has received and understood the training required? [68.71(c)]	☐ Y ☐ N ☐ N/A
24. Does the prepared record contain the identity of the employee, the date of the training, and the means used to verify that the employee understood the training? [68.71(c)]	☐ Y ☐ N ☐ N/A

Prevention Program: Mechanical integrity [68.73]

25. Has the owner or operator established and implemented written procedures to maintain the on-going integrity of the process equipment listed in 68.73(a)? [68.73(b)]	☐ Y ☐ N ☐ N/A
26. Has the owner or operator trained each employee involved in maintaining the on-going integrity of process equipment? [68.73(c)]	☐ Y ☐ N ☐ N/A
27. Has the owner or operator performed inspections and tests on process equipment? [68.73(d)(1)]	☐ Y ☐ N ☐ N/A
28. Has the owner or operator followed recognized and generally accepted good engineering practices for inspections and testing procedures? [68.73(d)(2)]	☐ Y ☐ N ☐ N/A
29. Has the owner or operator ensured the frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experience? [68.73(d)(3)]	☐ Y ☐ N ☐ N/A
30. Has the owner or operator documented each inspection and test that had been performed on process equipment, and identified the following: [68.73(d)(4)] ☐ The date of the inspection or test? ☐ The name of the person who performed the inspection or test? ☐ The serial number or other identifier of the equipment on which the inspection or test was performed? ☐ A description of the inspection or test performed? and ☐ The results of the inspection or test?	☐ Y ☐ N ☐ N/A
31. Has the owner or operator corrected deficiencies in equipment that were outside acceptable limits defined by the process safety information before further use or in a safe and timely manner when necessary means were taken to assure safe operation? [68.73(e)]	☐ Y ☐ N ☐ N/A
32. Has the owner or operator assured that equipment as it was 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)]	☐ Y ☐ N ☐ N/A
33. Has the owner or operator 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)]	☐ Y ☐ N ☐ N/A
34. Has the owner or operator assured that maintenance materials, spare parts and equipment were suitable for the process application for which they would be used? [68.73(f)(3)]	☐ Y ☐ N ☐ N/A

Prevention Program: Management of change [68.75]

35. Has the owner or operator established and implemented written procedures to manage changes to process chemicals, technology, equipment, and procedures, and changes to stationary sources that affect a covered process? [68.75(a)]	☐ Y ☐ N ☐ N/A
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RMP Program Level 3 Process Checklist**Facility Name:** _____

36. Do procedures assure that the following considerations are addressed prior to any change: [68.75(b)] ☐ The technical basis for the proposed change? [68.75(b)(1)] ☐ Impact of change on safety and health? [68.75(b)(2)] ☐ Modifications to operating procedures? [68.75(b)(3)] ☐ Necessary time period for the change? [68.75(b)(4)] ☐ Authorization requirements for the proposed change? [68.75(b)(5)]	☐ Y ☐ N ☐ N/A
37. Were employees, involved in operating a process and maintenance, and contract employees, whose job tasks would be affected by a change in the process, informed of, and trained in, the change prior to start-up of the process or affected parts of the process? [68.75(c)]	☐ Y ☐ N ☐ N/A
38. If a change resulted in a change in the process safety information, was such information updated accordingly? [68.75(d)]	☐ Y ☐ N ☐ N/A
39. If a change resulted in a change in the operating procedures or practices, had such procedures or practices been updated accordingly? [68.75(e)]	☐ Y ☐ N ☐ N/A

Prevention Program: Pre-startup safety review [68.77]

40. Has the owner or operator performed a pre-startup safety review for new stationary sources and for modified stationary sources when the modification is significant enough to require a change in the process safety information? [68.77(a)]	☐ Y ☐ N ☐ N/A
41. Does the pre-startup safety review confirm the following prior to the introduction of a regulated substance to a process: [68.77(b)] ☐ Construction and equipment was in accordance with design specifications? [68.77(b)(1)] ☐ Safety, operating, maintenance, and emergency procedures were in place and were adequate? [68.77(b)(2)] ☐ For new stationary sources, a process hazard analysis had been performed and recommendations had been resolved or implemented before startup? [68.77(b)(3)] ☐ Modified stationary sources meet the requirements contained in management of change? [68.77(b)(3)] ☐ Training of each employee involved in operating a process had been completed? [68.77(b)(4)]	☐ Y ☐ N ☐ N/A

Prevention Program: Compliance audits [68.79]

42. Has the owner or operator certified that the stationary source has evaluated compliance with the provisions of the prevention program at least every three years to verify that the developed procedures and practices are adequate and being followed? [68.79(a)]	☐ Y ☐ N ☐ N/A
43. Has the audit been conducted by at least one person knowledgeable in the process? [68.79(b)]	☐ Y ☐ N ☐ N/A
44. Are the audit findings documented in a report? [68.79(c)]	☐ Y ☐ N ☐ N/A
45. Has the owner or operator promptly determined and documented an appropriate response to each of the findings of the audit and documented that deficiencies had been corrected? [68.79(d)]	☐ Y ☐ N ☐ N/A
46. Has the owner or operator retained the two most recent compliance reports? [68.79(e)]	☐ Y ☐ N ☐ N/A

Prevention Program: Incident investigation [68.81]

47. Has the owner or operator investigated each incident that resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance? [68.81(a)]	☐ Y ☐ N ☐ N/A
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RMP Program Level 3 Process Checklist**Facility Name:** _____

48. Were all incident investigations initiated not later than 48 hours following the incident? [68.81(b)]	☐ Y ☐ N ☐ N/A
49. Was an accident investigation team established and did it consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of a contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident? [68.81(c)]	☐ Y ☐ N ☐ N/A
50. Was a report prepared at the conclusion of every investigation? [68.81(d)]	☐ Y ☐ N ☐ N/A
51. Does every report include: [68.81(d)] ☐ Date of incident? [68.81(d)(1)] ☐ Date investigation began? [68.81(d)(2)] ☐ A description of the incident? [68.81(d)(3)] ☐ The factors that contributed to the incident? [68.81(d)(4)] ☐ Any recommendations resulting from the investigation? [68.81(d)(5)]	☐ Y ☐ N ☐ N/A
52. Has the owner or operator established a system to promptly address and resolve the incident report findings and recommendations, and are the resolutions and corrective actions documented? [68.81(e)]	☐ Y ☐ N ☐ N/A
53. Was the report reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable? [68.81(f)]	☐ Y ☐ N ☐ N/A
54. Has the owner or operator retained incident investigation reports for at least five years? [68.81(g)]	☐ Y ☐ N ☐ N/A

Prevention Program: Employee participation [68.83]

55. Has the owner or operator developed a written plan of action regarding the implementation of the employee participation required by this section? [68.83(a)]	☐ Y ☐ N ☐ N/A
56. Has the owner or operator consulted with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in chemical accident prevention provisions? [68.83(b)]	☐ Y ☐ N ☐ N/A
57. Has the owner or operator provided to employees and their representatives access to process hazards analyses and to all other information required to be developed under the chemical accident prevention rule? [68.83(c)]	☐ Y ☐ N ☐ N/A

Prevention Program: Hot work permit [68.85]

58. Has the owner or operator issued a hot work permit for each hot work operation conducted on or near a covered process? [68.85(a)]	☐ Y ☐ N ☐ N/A
59. Does the permit document that the fire prevention and protection requirements in 29CFR 1910.252(a) have been implemented prior to beginning the hot work operations? [68.85(b)]	☐ Y ☐ N ☐ N/A
60. Does the permit indicate the date(s) authorized for hot work and the object(s) upon which hot work is to be performed? [68.85(b)]	☐ Y ☐ N ☐ N/A
61. Are the permits being kept on file until completion of the hot work operations? [68.85(b)]	☐ Y ☐ N ☐ N/A

Prevention Program: Contractors [68.87]

62. Has the owner or operator obtained and evaluated information regarding the contract owner or operator's safety performance and programs when selecting a contractor? [68.87(b)(1)]	☐ Y ☐ N ☐ N/A
63. Has the owner or operator informed contract owner or operator of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process? [68.87(b)(2)]	☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist

Facility Name: _____

64. Has the owner or operator explained to the contract owner or operator the applicable provisions of the emergency response or the emergency action program? [68.87(b)(3)]	☐ Y ☐ N ☐ N/A
65. Has the owner or operator developed and implemented safe work practices consistent with §68.69(d), to control the entrance, presence, and exit of the contract owner or operator and contract employees in the covered process areas? [68.87(b)(4)]	☐ Y ☐ N ☐ N/A
66. Periodically evaluated the performance of the contract owner or operator in fulfilling their obligations (as described at 68.87(c)(1) – (c)(5))? [68.87(b)(5)]	☐ Y ☐ N ☐ N/A

Subpart E - Emergency Response [68.90 - 68.96]

Developed and implemented an emergency response program as provided in 40 CFR 68.90-68.96? ☐ S ☐ M ☐ U ☐ N/A
Comments:

1. Is the facility designated as a “responding stationary source”?	☐ Y ☐ N ☐ N/A
1.a. If the facility is not a responding stationary source, it need not comply with §68.95 if the following conditions are met:	
1.a.(1) For stationary sources with any regulated substances held in a process above threshold quantities, is the source included in the community emergency response plan developed under 42 U.S.C. 11003? [68.90(b)(1)]	☐ Y ☐ N ☐ N/A
1.a.(2) For stationary sources with only regulated flammable substances held in a process above threshold quantities, has the owner or operator coordinated response actions with the local fire department? [68.90(b)(2)]	☐ Y ☐ N ☐ N/A
1.a.(3) Are appropriate mechanisms in place to notify emergency responders when there is need for a response? [68.90(b)(3)]	☐ Y ☐ N ☐ N/A
1.a.(4) As of September 21, 2018, has the owner or operator performed the annual emergency response coordination activities required under § 68.93? [68.90(b)(4)] (See Items 2 through 5)	☐ Y ☐ N ☐ N/A
1.a.(5) Has the owner or operator performed the annual notification exercises required under § 68.96(a) before December 19, 2024? [68.90(b)(5)] (See Items 6 and 7)	☐ Y ☐ N ☐ N/A

For non-responding stationary sources where 1.a.(1)-(5) are all marked as ‘Y’, proceed to Subpart E Item [2](#)

1.b. If the facility is a responding stationary source:	
1.b.(1) Has the owner or operator developed and implemented an emergency response program that includes the elements required in § 68.95(a)(1-4)? [68.95(a)] (See Items 1.b.(2) – 1.b.(5))	☐ Y ☐ N ☐ N/A
1.b.(2). An emergency response plan is maintained at the stationary source and contains the following? [68.95(a)(1)] ☐ Procedures for informing the public and the appropriate Federal, state, and local emergency response agencies about accidental releases? [68.95(a)(1)(i)] ☐ Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures? [68.95(a)(1)(ii)] ☐ Procedures and measures for emergency response after an accidental release of a regulated substance? [68.95(a)(1)(iii)]	☐ Y ☐ N ☐ N/A
1.b.(3) Does the emergency response program contains procedures for the use of emergency response equipment and for its inspection, testing, and maintenance? [68.95(a)(2)]	☐ Y ☐ N ☐ N/A
1.b.(4) Does the emergency response program include training for all employees in relevant procedures? [68.95(a)(3)]	☐ Y ☐ N ☐ N/A
1.b.(5) Does the emergency response program include procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes? [68.95(a)(4)]	☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist**Facility Name:** _____

1.b.(6) Does the emergency response program include a written plan that complies with other Federal contingency plan regulations or is consistent with the approach in the National Response Team's Integrated Contingency Plan Guidance ("One Plan")? If so, does the plan include the elements provided in paragraph (a) of 68.95, and also complies with paragraph (c) of 68.95? [68.95(b)]	☐ Y ☐ N ☐ N/A
1.b.(7) Has the emergency response plan been coordinated with the community emergency response plan developed under EPCRA? [68.95(c)]	☐ Y ☐ N ☐ N/A
1.b.(8) Has the owner or operator developed and implemented an exercise program for its emergency response program, including the emergency plan required under § 68.95(a)(1)? [68.96(b)]	☐ Y ☐ N ☐ N/A
1.b.(9) Do the exercises involve facility emergency response personnel and, as appropriate, emergency response contractors? [68.96(b)]	☐ Y ☐ N ☐ N/A
1.b.(10) When planning emergency response field and tabletop exercises, has the owner or operator coordinated with local public emergency response officials and invite them to participate in the exercise? [68.96(b)]	☐ Y ☐ N ☐ N/A
1.b.(11) Does the emergency response exercise program include: [68.96(b)] ☐ Emergency response field exercises? [68.96(b)(1)] ☐ Tabletop exercises? [68.96(b)(2)] ☐ Documentation? [68.96(b)(3)]	☐ Y ☐ N ☐ N/A
1.b.(12) As part of coordination with local emergency response officials, has the owner or operator consulted with these officials to establish an appropriate frequency for field exercises? [68.96(b)(1)(i)]	☐ Y ☐ N ☐ N/A
1.b.(13) Field exercises shall involve tests of the source's emergency response plan, including deployment of emergency response personnel and equipment. Do field exercises include: [68.96(b)(1)(ii)] ☐ Tests of procedures to notify the public and the appropriate Federal, state, and local emergency response agencies about an accidental release? ☐ Tests of procedures and measures for emergency response actions including evacuations and medical treatment? ☐ Tests of communications systems? ☐ Mobilization of facility emergency response personnel, including contractors, as appropriate? ☐ Coordination with local emergency responders? ☐ Emergency response equipment deployment? ☐ Any other action identified in the emergency response program, as appropriate?	☐ Y ☐ N ☐ N/A
1.b.(14) As part of coordination with local emergency response officials, has the owner or operator consulted with these officials to establish an appropriate frequency for tabletop exercises and conducted a tabletop exercise before December 21, 2026 and at a minimum of at least once every three years thereafter? [68.96(b)(2)(i)]	☐ Y ☐ N ☐ N/A
1.b.(15) Tabletop exercises shall involve discussions of the source's emergency response plan. Do the exercises include discussions of: [68.96(b)(2)(ii)] ☐ Procedures to notify the public and the appropriate Federal, state, and local emergency response agencies? ☐ Procedures and measures for emergency response including evacuations and medical treatment? ☐ Identification of facility emergency response personnel and/or contractors and their responsibilities? ☐ Coordination with local emergency responders? ☐ Procedures for emergency response equipment deployment? ☐ Any other action identified in the emergency response plan, as appropriate?	☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist

Facility Name: _____

1.b.(16) Has the owner or operator prepared an evaluation report within 90 days of each field and tabletop exercise, which included: [68.96(b)(3)] ☐ A description of the exercise scenario? ☐ Names and organizations of each participant? ☐ An evaluation of the exercise results including lessons learned? ☐ Recommendations for improvement or revisions to the emergency response exercise program and emergency response program, and a schedule to promptly address and resolve recommendations?	☐ Y ☐ N ☐ N/A
1.b.(17) Has the owner or operator satisfied the requirement to conduct notification, field and/or tabletop exercises through alternative means such as: [68.96(c)] ☐ Exercises conducted to meet other Federal, state, or local exercise requirements, provided the exercise meets the requirements of paragraphs (a) and/or (b) of this section, as appropriate. [68.96(c)(1)] ☐ Response to an accidental release, provided the response includes the actions indicated in paragraphs (a) and/or (b) of this section, as appropriate. When used to meet field and/or tabletop exercise requirements, the owner or operator shall prepare an after-action report comparable to the exercise evaluation report required in paragraph (b)(3) of this section, within 90 days of the incident. [68.96(c)(2)]	☐ Y ☐ N ☐ N/A

For all responding and non-responding stationary sources:

2. Has the owner or operator of a stationary source coordinated response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance? [68.93(a)]	☐ Y ☐ N ☐ N/A
3. Has coordination occurred at least annually, and more frequently if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan? [68.93(a)]	☐ Y ☐ N ☐ N/A
4. Has coordination included providing to the local emergency planning and response organizations? [68.93(b)] ☐ The stationary source's emergency response plan if one exists? ☐ Emergency action plan? ☐ Updated emergency contact information? ☐ Other information necessary for developing and implementing the local emergency response plan? ☐ For responding stationary sources, has facility consulted with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under §68.96(b)? (See Items 1.b.(8), 1.b.(10), 1.b.(12), and 1.b.(14))	☐ Y ☐ N ☐ N/A
5. As of September 21, 2018, has the owner or operator documented coordination with local authorities, including: [68.93(c)] ☐ The names of individuals involved and their contact information (phone number, email address, and organizational affiliations)? ☐ Dates of coordination activities? ☐ Nature of coordination activities?	☐ Y ☐ N ☐ N/A
6. Has the owner or operator of a stationary source with any Program 2 or Program 3 process conducted an exercise of the stationary source's emergency response notification mechanisms before December 19, 2024 and annually thereafter? [68.96(a)] (Owners or operators of responding stationary sources may perform the notification exercise as part of the tabletop and field exercises)	☐ Y ☐ N ☐ N/A

RMP Program Level 3 Process Checklist**Facility Name:** _____

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| 7. Has the owner/operator maintained a written record of each notification exercise conducted over the last five years? [68.96(a)] | ☐ Y ☐ N ☐ N/A |
|--|--|

Subpart G – Risk Management Plan [40 CFR 68.150 – 68.195]

Documented a Risk Management Plan as provided in 40 CFR 68.150-68.195? Comments:	☐ S ☐ M ☐ U ☐ N/A
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- | | |
|---|--|
| 1. Does the single registration form include, for each covered process: [68.160(b)(7)]

☐ The name and CAS number of each regulated substance held above the threshold quantity in the process?

☐ The maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits?

☐ The five- or six-digit NAICS code that most closely corresponds to the process?

☐ The correct program level of the process? | ☐ Y ☐ N ☐ N/A |
| 2. Does the registration form include whether a public meeting has been held following an RMP reportable accident, pursuant to §68.210(b)? [68.160(b)(21)] | ☐ Y ☐ N ☐ N/A |
| 3. Does the owner or operator provide in the RMP: [68.180(a)]

☐ Name, phone number and email address of local emergency planning and response organizations with which the stationary source last coordinated emergency response efforts, pursuant to §68.10(g)(3) or §68.93? [68.180(a)(1)]

☐ The date of the most recent coordination with the local emergency response organizations, pursuant to §68.93? [68.180(a)(2)]

☐ A list of Federal or state emergency plan requirements to which the stationary source is subject? [68.180(a)(3)] | ☐ Y ☐ N ☐ N/A |
| 4. For non-responding stationary sources, does the owner or operator identify: [68.180(b)(1)]

☐ For stationary sources with any regulated toxic substance held in a process above the threshold quantity, whether the stationary source is included in the community emergency response plan developed under 42 U.S.C. 11003, pursuant to §68.90(b)(1)? [68.180(b)(1)(i)]

☐ For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the date of the most recent coordination with the local fire department, pursuant to §68.90(b)(2)? [68.180(b)(1)(ii)]

☐ What mechanisms are in place to notify the public and emergency responders when there is a need for emergency response? [68.180(b)(1)(iii)]

☐ The date of the most recent notification exercise, as required in §68.96(a)? [68.180(b)(1)(iv)] | ☐ Y ☐ N ☐ N/A |
| 5. For responding stationary sources, does the owner or operator identify the date of the most recent: [68.180(b)(2)]

☐ Review and update of the emergency response plan, pursuant to §68.95(a)(4)? [68.180(b)(2)(i)]

☐ Notification exercise, as required in §68.96(a)? [68.180(b)(2)(ii)]

☐ Field exercise, as required in §68.96(b)(1)? [68.180(b)(2)(iii)]

☐ Tabletop exercise, as required in §68.96(b)(2)? [68.180(b)(2)(iv)] | ☐ Y ☐ N ☐ N/A |

RMP Program Level 3 Process Checklist**Facility Name:** _____

6. Has the owner or operator reviewed and updated the RMP and submitted it to EPA for the following: [68.190(a)]? ☐ Five-year update. [68.190(b)(1)] ☐ Within three years of a newly regulated substance listing. [68.190(b)(2)] ☐ At the time a new regulated substance is first present in an already regulated process above threshold quantities. [68.190(b)(3)] ☐ At the time a regulated substance is first present in a new process above threshold quantities. [68.190(b)(4)] ☐ Within six months of a change requiring revised PHA or hazard review. [68.190(b)(5)] ☐ Within six months of a change requiring a revised OCA as provided in 68.36. [68.190(b)(6)] ☐ Within six months of a change that alters the Program level that applies to any covered process. [68.190(b)(7)]	☐ Y ☐ N ☐ N/A
7. If the owner or operator experienced an accidental release that met the five-year accident history reporting criteria (as described at 68.42) subsequent to April 9, 2004, did the owner or operator submit the information required at 68.168, 68.170(j) and 68.175(l) within six months of the release or by the time the RMP was updated as required at 68.190, whichever was earlier. [68.195(a)]	☐ Y ☐ N ☐ N/A
8. If the emergency contact information required at 68.160(b)(6) has changed since June 21, 2004, did the owner or operator submit corrected information within thirty days of the change? [68.195(b)]	☐ Y ☐ N ☐ N/A

Subpart H – Other Requirements [40 CFR 68.200 – 68.210]

Implemented Other Requirements as provided in 40 CFR 68.200-68.210? ☐S ☐M ☐U ☐N/A
Comments:

1. Has the owner or operator maintained records supporting the implementation of this part at the stationary source for five years, unless otherwise provided in Subpart D: Program 3 Prevention Program? [68.200]	☐ Y ☐ N ☐ N/A
2. Did the owner or operator hold a public meeting to provide information required under §68.42(b), no later than 90 days after any RMP reportable accident at the stationary source with any known offsite impact specified in §68.42(a)? [68.210(b)]	☐ Y ☐ N ☐ N/A