

LDEQ Chemical Accident Prevention Risk Management Plan Audit

Pre-Audit Activities:

- 1) File Review
 - a. Review the last (5) years of releases
 - b. Review previous reports to determine previously audited units and to determine if there were any areas of concern noted
 - c. Check facility's overall compliance history
 - d. Check fees
- 2) RMP Review
 - a. Review types and quantities of chemicals
 - b. Review the offsite consequence analysis to verify the worst case scenarios and alternate release scenarios
 - c. Review accident history, prevention program, and emergency response programs

On-site Audit Activities:

- 1) Initial Entry
 - a. Identify ourselves
 - b. Request to see the contact on the RMP to perform an RMP audit
 - c. Watch safety video, if applicable
 - d. Discuss PPE required to enter the facility, if applicable
- 2) Pre-Audit Conference
 - a. Opening conference with appropriate personnel
 - b. Give a copy of the audit checklist to the facility
 - c. Request facility personnel describe their process(es) using a process flow diagram or other simple drawing, distinguish where the covered process begins and ends
 - d. Auditors make a final decision on which unit or units will be audited
 - e. Develop a preliminary schedule to review each of the RMP elements with the appropriate personnel
- 3) Facility Tours — take a facility tour of the covered area(s) focusing on equipment condition, labeling, hot work, general housekeeping, and safety equipment (monitors, fire extinguishers, alarms, eye wash stations, etc.
- 4) Records Reviews and Personnel Interviews
 - a. See common requested records on back of this sheet
 - b. Interview personnel to discuss the facility's implementation of each program element and review examples to evaluate compliance
- 5) Closeout Conference
 - a. Review *preliminary* findings with facility personnel
 - i. Recommendations
 - ii. Follow-ups — information the facility will need to provide after the audit to determine compliance with the regulations
(**N.B.:** Follow-ups should be provided within two weeks. If the facility does not send the requested information, the follow-ups will become areas of concern.)
 - iii. Areas of concern — potential violations to be determined by Enforcement
 - b. Field Interview Form (FIF) — Auditors leave a FIF documenting the findings of the audit. Findings on the FIF are preliminary and not final until report is approved by all necessary DEQ personnel.

How LDEQ auditors evaluate the RMP for compliance:

Program Level 2

- 1) Copy of Management System (68.15)
- 2) Worst Case Scenario and Alternate Release Scenario(s) (68.39) — documentation and rationale for selection
- 3) Safety Information (68.48)
- 4) Hazard Reviews (68.50) — review last two hazard reviews
- 5) Operating Procedures (68.52) — auditor will select procedures to be reviewed
- 6) Training (68.54) — auditor will select operators and review their initial and refresher training
- 7) Maintenance (68.56) — review procedures, maintenance employee training, test results, and inspection records
- 8) Compliance Audits (68.58) — review last two compliance audits
- 9) Incident Investigation (68.60) — a list of Incident Reports/Investigations for all incidents that resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance over the last 5 years
- 10) Emergency Response (ER) – Non responders (68.90) — documentation coordination of response actions with Local Emergency Plan Committees (LEPC) and/or local fire department
- 11) Emergency Response – Responders (68.95) — ER plan, procedures for the use of ER equipment and for its inspection, testing, and maintenance, training records for ER team, and documentation of facility's coordination of ER plan with LEPC and/or fire department

Program Level 3

- 1) Copy of Management System (68.15)
- 2) Worst Case Scenario and Alternate Release Scenario(s) (68.39) — documentation and rationale for selection
- 3) Process Safety Information (68.65) — all required documentation
- 4) Process Hazard Analysis (68.67) — written procedures for the PHA and the last two PHAs
- 5) Operating Procedures (68.69) — auditor will select procedures to be reviewed and review last two annual certifications of all operating procedures
- 6) Training (68.71) — auditor will select operators and review their initial and refresher training
- 7) Mechanical Integrity (68.73) — review procedures and requested maintenance employee training records, equipment tests, and inspections
- 8) Management of Change (68.75) — review policy and the auditor will select and review MOCs
- 9) Pre-Startup Safety Review (68.77) — the auditor will select and review PSSRs
- 10) Compliance Audits (68.79) — review policy and last two compliance audits
- 11) Incident Investigation (68.81) — a list of Incident Reports/Investigations for all incidents which resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance over the last 5 years
- 12) Employee Participation (68.83) — review plan
- 13) Hot Work Permit (68.85) — examples of open hot work permits
- 14) Contractors (68.87) — review policy and contractor evaluation
- 15) Emergency Response (ER) – Non responders (68.90) — documentation coordination of response actions with Local Emergency Plan Committees (LEPC) and/or local fire department
- 16) Emergency Response – Responders (68.95) — ER plan, procedures for the use of ER equipment and for its inspection, testing, and maintenance, training records for ER team, and documentation of facility's coordination of ER plan with LEPC and/or fire department