**Management [68.15]**

Has the owner or operator:

**68.15 (a) Developed a management system to oversee the implementation of the risk management program elements?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 (b) Assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements?

  **[ ]  Yes [ ]  No [ ]  N/A**

 (c) Documented other persons responsible for implementing individual requirements of the risk management program and defined the lines of authority through an organization chart or similar document?

  **[ ]  Yes [ ]  No [ ]  N/A**

# Hazard Assessment Documentation [68.39]

**68.39 (a) – (e) Has the owner/operator maintained on site the required documentation for the hazard assessments (worst-case and alternative release scenario)?**

 **[ ]  Yes [ ]  No [ ]  N/A**

## **Process Safety Information [68.65]**

**68.65 (a) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Does the process safety information contain the following for hazards of the substances (required elements):**

 **(1) Toxicity information?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Permissible exposure limits?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Physical data?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) Reactivity data?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(5) Corrosivity data?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(6) Thermal and chemical stability data?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(7) Hazardous effects of inadvertent mixing of materials that could foreseeably occur?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) (1) Does the process safety information contain the following for technology of the process (required elements):**

 **(i) A block flow diagram or simplified process flow diagram?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(ii) Process chemistry?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iii) Maximum intended inventory?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iv) Safe upper and lower limits for such items as temperature, pressure, flow or composition?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(v) An evaluation of the consequences of deviations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(d) (1) Does the process safety information contain the following for the equipment in the process (required elements):**

 **(i) Materials of construction?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(ii) Piping and instrument diagrams?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iii) Electrical classification?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iv) Relief system design and design basis?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(v) Ventilation system design?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(vi) Design codes and standards employed?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(vii) Material and energy balances for processes built after June 21, 1999?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(viii) Safety systems?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Has the owner or operator documented that equipment complies with recognized and generally accepted good engineering practices?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Process Hazard Analysis [68.67]**

**68.67 (a) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Has the owner or operator determined and documented the priority order for conducting PHAs, and was it based on appropriate rationales?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Has the owner or operator used one or more of the following technologies:**

 **(1) What‑If?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Checklist?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) What‑If/Checklist?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) Hazard and Operability Study (HAZOP)?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(5) Failure Mode and Effects Analysis (FMEA)?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(6) Fault Tree Analysis?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(7) An appropriate equivalent methodology?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) Did the PHA address:**

 **(1) The hazards of the process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Identification of any incident which had a likely potential for catastrophic consequences?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Engineering and administrative controls applicable to hazards and interrelationships?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) Consequences of failure of engineering and administrative controls?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(5) Stationary source siting?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(6) Human factors?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(7) A qualitative evaluation of a range of possible safety and health effects of failure of controls?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(d) Was the PHA performed by a team with expertise in engineering and process operations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Did the team include one employee with experience and knowledge specific to the process and one member knowledgeable in the specific PHA method used?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(e) Has the owner or operator established a system to:**

 **Promptly address the team's findings and recommendations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Assure that the recommendations are resolved in a timely manner and documented?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Document what actions are to be taken?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Complete actions as soon as possible?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Develop a written schedule of when these actions are to be completed?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(f) Has the PHA been updated and revalidated every five years after the completion of the initial PHA to assure that the PHA is consistent with the current process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Was the update and revalidation performed by a team that met the requirements of 68.67(d)?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(g) Has the owner or operator retained PHAs and updates or revalidations for each process covered for the life of the process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Has the owner or operator retained for the life of the process documentation of the resolution of recommendations resulting from compliance with 68.67(e)?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Operating Procedures [68.69]**

**68.69 (a) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(1) Do the procedures address the following steps for each operating phase:**

 **(i) Initial startup?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(ii) Normal operations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iii) Temporary operations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iv) Emergency shutdown?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Conditions under which emergency shutdown is required?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(v) Emergency operations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(vi) Normal shutdown?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(vii) Startup following a turnaround, or after emergency shutdown?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Do the procedures address the following operating limits:**

 **(i) Consequences of deviations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(ii) Steps required to correct or avoid deviation?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Do the procedures address the following safety and health considerations:**

 **(i) Properties of, and hazards presented by, the chemicals used in the process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(ii) Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iii) Control measures to be taken if physical contact or airborne exposure occurs?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iv) Quality control for raw materials and control of hazardous chemical inventory levels?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(v) Any special or unique hazards?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) Safety systems and their functions?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Are operating procedures readily accessible to employees who are involved in a process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) Has the owner or operator certified annually that the operating procedures are current and accurate?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Has there been a change in process chemicals, technology, and equipment and/or changes to stationary sources that necessitate a review of the operating procedures?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(d) 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 stationary source by outside support personnel?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Training [68.71]**

**68.71 (a) (1) Has each employee presently 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Did the owner or operator certify in writing (in lieu of initial training) that employees already involved in operating a process prior to June 21, 1999, has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Has the owner or operator consulted with employees involved in operating the process to determine the appropriate frequency of refresher training?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) Has owner or operator ascertained and documented in a record that each employee involved in operating a process has received and understood the training required?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Has the owner or operator prepared record for each employee which contains:**

 **The identity of the employee?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **The date of training?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **The means used to verify that the employee understood the training?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Mechanical Integrity [68.73]**

**68.73 (b) 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)?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) Has the owner or operator trained each employee involved in maintaining the on‑going integrity of process equipment? Training should have included an overview of the process, an overview of the process hazards, and specific training in the procedures applicable to the employee’s job task.**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(d) Has the owner or operator:**

 **(1) Performed inspections and tests on process equipment?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Followed recognized and generally accepted good engineering practices for inspection and testing procedures?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Ensured the frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experience?**

 **[ ]  Yes [ ]  No [ ]  N/A**

1. **Documentation of each inspection and test that had been performed on process equipment included:**

 **The date of the inspection or test?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **The name of the person who performed the inspection or test?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **The serial number or other identifier of the equipment on which the inspection or test was performed?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **A description of the inspection or test performed?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **The results of the inspection or test?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(e) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(f) (1) In the construction of new plants and equipment, assured that equipment as it was fabricated is suitable for the process application for which it will be used?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Performed appropriate checks and inspections to assure that equipment was installed properly and consistent with design specifications and the manufacturer's instructions?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Assured that maintenance materials, spare parts and equipment were suitable for the process application for which they would be used?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Management of Change [68.75]**

**68.75 (a) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Do procedures assure that the following considerations are addressed prior to any change:**

 **(1) The technical basis for the proposed change?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Impact of change on safety and health?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Modifications to operating procedures?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) Necessary time period for the change?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(5) Authorization requirements for the proposed change?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) 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 part of the process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(d) If a change resulted in change in the process safety information, was such information updated accordingly?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(e) If a change resulted in a change in the operating procedures or practices, had such procedures or practices been updated accordingly?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Pre-Startup Safety Review [68.77]**

**68.77 (a) Has the owner or operator performed a pre‑startup safety review for:**

**New stationary sources**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Modified stationary sources when the modification was significant enough to require a change in the process safety information?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Did the pre‑startup safety review confirm that prior to the introduction of regulated substances to a process:**

 **(1) Construction and equipment was in accordance with design specifications?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Safety, operating, maintenance, and emergency procedures were in place and were adequate?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) For new stationary sources, a process hazard analysis had been performed and recommendations had been resolved or implemented before startup?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Modified stationary sources meet the requirements contained in management of change?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) Training of each employee involved in operating a process had been completed?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Compliance Audits [68.79]**

**68.79 (a) 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 are being followed?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Has the audit been conducted by at least one person knowledgeable in the process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) Are the audits findings documented in report?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(d) Has the owner or operator promptly determined and documented an appropriate response to each of the findings of the audit and documented that deficiencies had been corrected?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(e) Has the owner or operator retained the two most recent compliance audit reports?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Incident Investigation [68.81]**

**68.81 (a) Has the owner or operator investigated each incident which resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Were all incident investigations initiated not later than 48 hours following the incident?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) Was an incident investigation team established?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Did the team consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(d) Was a report prepared at the conclusion of every investigation?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Does every report include:**

 **(1) Date of incident?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Date investigation began?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) A description of the incident?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) The factors that contributed to the incident?**

 **[ ]  Yes** **[ ]  No** **[ ]  N/A**

 **(5) Any recommendations resulting from the investigation?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(e) Has the owner or operator established a system to address and resolve the report findings and recommendations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Are the resolutions and corrective actions documented?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(f) Was the report reviewed with all affected personnel (including contract employees) whose job tasks are relevant to the incident findings?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(g) Have incident investigation reports been retained for a minimum of five years?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Employee Participation [68.83]**

**68.83 Has the owner or operator:**

 **(a) Developed a written plan of action regarding the implementation of the employee participation required by this section?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) Provided to employees and their representatives access to process hazard analyses and to all other information required to be developed under chemical accident prevention rule?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Hot Work Permit [68.85]**

**68.85 (a) Has the owner or operator issued a hot work permit for each hot work operation conducted on or near a covered process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Does the permit document that the fire prevention and protection requirements in 29 CFR 1910.252(a) have been implemented prior to beginning the hot work operations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Does the permit indicate:**

 **The date(s) authorized for hot work**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **The object on which hot works to be performed?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Are the permits being kept on file until completion of the hot work operations?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Contractors [68.87]**

**68.87 (b) Has the owner or operator:**

 **(1) Obtained and evaluated information regarding the contract owner or operator's safety performance and programs when selecting a contractor?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Informed contract owner or operator of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Explained to the contract owner or operator the applicable provisions of the emergency response program?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) 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 covered process areas?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(5) Has the owner or operator periodically evaluated that each contract employee is trained in the work practices to safely perform his/her job?**

 **[ ]  Yes [ ]  No [ ]  N/A**

**Emergency Response — Applicability [68.90]**

**68.90 (a) Will employees of a stationary source respond to emergencies?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **If YES, proceed to 68.95(a).**

 **If NO, continue.**

 **(b) If employees of the stationary source WILL NOT RESPOND to accidental releases of regulated substances:**

 **(1) For stationary sources with any regulated toxic substance held in a process above the threshold quantity, is the stationary source included in the community emergency response plan developed under EPCRA?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) For stationary sources with only regulated flammable substances held in a process above the threshold quantity, has the owner or operator coordinated response actions with the local fire department?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Are appropriate mechanisms in place to notify emergency responders when there is a need for a response?**

 **[ ]  Yes [ ]  No [ ]  N/A**

## **Emergency Response — Program [68.95]**

**68.95 (a) Has the owner or operator developed and implemented an emergency response program for the purpose of protecting public health and the environment?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Does the program include the following elements?**

 **(1) An emergency response plan which is maintained at the stationary source?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Does the emergency response plan contain the following elements:**

 **(i) Procedures for informing the public and local emergency response agencies about accidental releases?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(ii) Documentation of proper first‑aid and emergency medical treatment necessary to treat accidental human exposures?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(iii) Procedures and measures for emergency response after an accidental release of a regulated substance?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(2) Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(3) Training for all employees in relevant procedures?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(4) 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(b) Did the owner or operator use 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?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **(c) Has the emergency response plan been coordinated with the community emergency response plan developed under EPCRA?**

 **[ ]  Yes [ ]  No [ ]  N/A**

 **Has the owner or operator provided to the local emergency response officials information necessary for developing and implementing the community emergency response plan requested by the LEPC or emergency response officials?**

 **[ ]  Yes [ ]  No [ ]  N/A**