

CHECKLIST FOR SIMPLE REVALIDATION

Questions	Yes/No	Comments
Previous PHA		
1. Have all OSHA PHA requirements been adequately addressed?		
2. Is documentation from the previous PHA available?		
3. Have all recommendations from the previous PHA been resolved?		
Modifications to the Process		
1. Was a management of change system implemented before or in conjunction with the completion of the previous PHA?		
2. Is safety and health assessment or hazard evaluation documentation available for process modifications made since the previous PHA?		
3. Have process modifications been evaluated to determine whether additional engineered or administrative controls are necessary to maintain continued safe operation of the process?		
4. Have process modifications been evaluated to determine whether additional emergency response capabilities or activities are necessary?		
5. Have process modifications been evaluated to determine whether engineered or administrative safeguards have been rendered ineffective (relief capacities exceeded due to higher unit throughputs, etc.)?		
6. Have all PHA issues (e.g., facility siting, human factors) been addressed for equipment added to the process?		

Questions	Yes/No	Comments
Modifications to the Process (continued)		
7. Have any new utilities been directly connected to the process?		
8. Have safety system connections (e.g., nitrogen purge) been removed from process equipment?		
9. Have equipment relief valves been changed from atmospheric discharge to a closed system (or vice versa)?		
10. Are new hazards present due to new operating modes?		
11. Are new hazards present due to new process chemistry?		
12. Have the consequences of a release changed due to significantly modified operating conditions (e.g., temperature, pressure)?		
13. Have the hazards associated with equipment that has been returned to service since the previous PHA been evaluated?		
14. Have the hazards associated with equipment that has been removed from service since the previous PHA been evaluated?		
Facility Modifications		
1. Have buildings, trailers, etc., been constructed or relocated since the previous PHA such that they could be affected by a release?		
2. Have staffing levels changed since the previous PHA such that capabilities to quickly respond to emergency situations have diminished?		
3. Have traffic patterns (e.g., new rail spur, new chemical truck routing) changed since the previous PHA (e.g., could the process be affected by a new release source, can emergency responders reach the process easily, are external impacts more like)?		

Questions	Yes/No	Comments
Facility Modifications (continued)		
4. Has the operator training program remained substantially the same or been enhanced since the previous PHA?		
5. Have maintenance practices remained substantially the same or been enhanced since the previous PHA?		
6. Have inspection and test practices remained substantially the same or been enhanced since the previous PHA, particularly for standby safety systems (e.g., interlocks, relief valves)?		
7. Are new hazards present due to new chemicals being used?		
8. Are new industry standards or guidelines that apply to relief system design for equipment in this process being implemented or evaluated?		
9. Have atmospheric detectors for hazardous chemicals been relocated, removed, abandoned, or disabled?		
10. Have control displays changed such that information necessary to diagnose and respond to upset conditions is not readily accessible?		
11. Are new industry standards or guidelines that apply to inspection and testing of equipment in the process being implemented or evaluated?		
12. Are there new ignition sources near this process?		
13. Has the fuel changed for fired heaters (e.g., furnaces, reboilers)?		
14. Has the process sewer system changed (e.g., now a closed system)?		
15. Have normal inventories of hazardous chemicals changed such that the consequences of a release have been significantly altered?		

Questions	Yes/No	Comments
Facility Modifications (continued)		
16. Have operator communication systems changed?		
17. Has spill containment equipment or systems changed?		
18. Have process water treatment systems changed?		
19. Are there new units or equipment nearby that could affect this process?		
20. Are equipment and piping system labels being maintained?		
21. Are color coding systems for piping and components being maintained?		
22. Is a higher pressure utility being used to prepare equipment for maintenance?		
23. Do equipment cleaning procedures require the use of a new chemical?		
24. Are new utilities being used to prepare equipment for maintenance?		
25. Have containment levels or contaminants in raw materials changed such that new hazardous deposits could be formed?		
26. Have emergency alarm or notification systems changed?		
27. Are safe work practice requirements substantially the same or more rigorous (confined space entry, entry into process area, lockout/tagout, "linebreaking," lifting over process equipment, etc.)?		
28. Have fire detection or suppression systems been modified such that they require a different operator response?		

Questions	Yes/No	Comments
Facility Modifications (<i>continued</i>)		
29. Has the area electrical classification changed such that some equipment is not properly rated for its service?		
30. Is new/modified equipment properly rated for its area electrical classification?		
31. Have facility modifications made alarms difficult to see or hear?		
32. Have facility modifications increased the number of locations that should have PPE available?		
33. Have facility modifications introduced a need to install or relocate existing safety shower/eyewash stations?		
34. Have facility modifications resulted in the potential to overwhelm an operator with alarms during upset conditions?		
35. Have personnel been relocated such that responding to equipment deficiencies (e.g., shutting down a pump with a leaking seal) may take a significantly longer time?		
Previous Incidents		
1. Have incident findings and recommendations been communicated to affected operating, maintenance, and contractor personnel?		
2. Have there been incidents or near misses at other processes within the facility that are relevant to this process?		
3. Have there been significant incidents or near misses at similar facilities within the company that are relevant to this process?		
4. Have there been significant incidents within the industry that are relevant to this process?		

Questions	Yes/No	Comments
Previous Incidents (<i>continued</i>)		
5. Are there other incidents or near misses for which reports are not available?		
6. Have corrective actions taken in response to incident investigation findings been resolved or implemented?		