



**REGION 7 U.S. ENVIRONMENTAL PROTECTION AGENCY
CHECKLIST FOR GENERAL DUTY INSPECTION UNDER CAA 112(R)**

Instructions. For each question answer by checking Yes (Y), No (N), or Not Applicable (NA). Each question is paraphrased from the regulation. For every point of clarification or incident of violation list the evidence supporting it in the comment field.

GENERAL FACILITY INFORMATION

1. Facility Name:	
2. Mailing Address (Street, City, State, Zip):	
3. Physical Address or location description (Street, City, State, Zip):	
4. Latitude: Longitude: Where Taken:	
5. County:	
6. Facility Contact:	
7. Facility Contact Phone Number:	
8. Facility Contact E-mail:	
9. Website (optional):	
10. List and Describe all Processes and indicate which are being inspected or audited:	
11. Facility History	

Arrive: _____ Leave: _____ Arrive: _____ Leave: _____

GENERAL Applicability				
Parameters	Y	N	NA	Comment
§68.10(a) – Is the facility a stationary source with more than a threshold quantity of a regulated substance in a process per §68.115?				Indicate process, substance and quantity for this audit/inspection:
§68.10(b)(3) – Have emergency response procedures been <u>coordinated</u> with local planning and response organizations?				Verified with LEPC/FD contact (name):
§68.10(d)(1) - Does the facility have a listed NAICS code(s)?				
§68.10(d)(2) - Is facility subject to OSHA PSM?				

What is the program level for this process?	Non-Filer No to §68.10(a)	Program 1 Yes to §68.10(a) and §68.10(b)(3)	Program 2 Yes to §68.10(a) and neither Program 1 or Program 3	Program 3 Yes to §68.10(a) and either of §68.10(d)(1 or 2)

HAZARD IDENTIFICATION				
	Y	N	NA	COMMENT
Have the owners/operators completed Process Hazard Analyses (PHA) or Hazard Review (HR) for each process involving extremely hazardous substances (EHSs)?				
Did the owner/operators use appropriate hazard assessment techniques?				What-if What-if/Checklist Checklist HAZOP FMEA Fault Tree
Are the PHA/HR complete, accurate, correct and do they				
Identify the intrinsic hazards of the substance and process?				MSDS
Identify the potential releases from the process?				
Identify the potential impacts on the public and the environment?				What modeling program? (ARCHIE, ALOHA, RMP*Comp, Degadis)
Are these impacts realistic, accurate, and correct?				Environmental conditions?
Technology of the Process:				
Maximum intended inventory?				
Safe upper and lower limits for temperatures, pressures, flows, etc.?				
Evaluation of consequence of deviation?				

FACILITY DESIGN and MAINTENANCE				
	Y	N	NA	Comment
Design:				
Are design documents for each process correct, accurate, and current?				
Do designs minimize risks of releases based on PHA/HR?				
Evaluation of design documents:				
Are design codes identified and appropriate for the process?				
Was facility constructed or modified according to design specifications?				
Are there quality control procedures to ensure construction materials meet design specification?				
Do critical process component have redundant systems installed?				
Has the facility design been updated to current codes and standards?				Which standards?
Are there remote monitoring and remote control capabilities for dealing with upsets?				Monitor calibration ppm?

FACILITY DESIGN and MAINTENANCE				
	Y	N	NA	Comment
Maintenance:				
Are there preventive maintenance procedures to ensure the mechanical integrity of the process equipment?				
Do maintenance procedures and preventive schedules follow generally accepted engineering practices?				
Are maintenance personnel trained on hazards of the chemicals, the process and in maintenance procedures?				
Does training include understanding and proficiency evaluations?				Means to verify understanding? Written tests, oral, demonstration?
Is there a maintenance supplies and parts inventory that corresponds with maintenance schedules, especially for critical components that affect process safety?				
Is there a quality control program to ensure spare parts meet specifications, and is it implemented and working?				Means to verify understanding? Written tests, oral, demonstration?
How has the facility minimized the possibility of an unauthorized entry?				Means to verify understanding? Written tests, oral, demonstration?

FACILITY DESIGN and MAINTENANCE				
	Y	N	NA	Comment
Operations:				
Are there Standard Operating Procedures (SOPs) for each process?				
Do SOPs cover each phase of each process?				
Initial Startup				
Startup				
Normal Operations				
Shut Down				
Emergency Shutdown				
Emergency and Temporary Ops				
Startup after Emergency shutdown				
Consequences of deviation and steps to correct or avoid?				
Are SOPs clear, concise, correct, and written at the appropriate level of understanding for the operator?				
Do SOPs identify upper and lower limits for operating parameters like temperatures, pressures, flows, volumes, levels, pH, concentrations, etc.?				
Do limits for parameters agree with those identified in PHA/HR?				
Are process equipment components such as valves, gauges, pumps, vessels clearly marked and agree with SOP nomenclature?				
Are SOP's revised periodically and current?				
Revised after incidents?				

Facility/Process: _____

Lined writing area consisting of 25 horizontal lines.

FACILITY DESIGN and MAINTENANCE				
	Y	N	NA	Comment
Training:				
Are employees trained and tested for competence on the safe operating procedures for the process they operate?				How tested?
Is training adequate?				How much, How often?
Are employees trained on the intrinsic hazards of the substance and the process and the consequences of deviation from the limits for process parameters?				
What is the frequency of training?				
Are there communication procedures to ensure that instructions given are clear and understood correctly (i.e. "repeat back" the instructions)?				
Are employees trained to recognize emergency situations?				
Are they authorized to take actions to prevent them or mitigate them?				
Does training reflect current operations?				

FACILITY DESIGN and MAINTENANCE				
	Y	N	NA	Comment
Managing Change:				
When changes in the process are planned, are they evaluated as to how these changes will affect the hazards identified in PHA/HR?				
Hazards				
Materials of Construction				
Operating Procedures				
Maintenance Procedures				
Prevention Programs				

Facility/Process: _____

Lined writing area consisting of 30 horizontal lines.

FACILITY DESIGN and MAINTENANCE				
	Y	N	NA	Comment
Incident Investigation:				
Does the facility investigate incidents resulting in catastrophic releases within 48 hours?				
Does the team contain at least one person knowledgeable in the process?				
Does the investigation report contain:				
Date of incident?				
Date the investigation began?				
Incident description?				
Factors contributing to incident?				
Recommendations?				
Is there a system to promptly resolve and document resolution of the report findings?				
Are findings evaluated to ensure that any new information is included in PHA/HR reviews, SOP's, and maintenance programs?				
Self Audits:				
Does owner/operator practice self-auditing of the facility's prevention program?				
Is it done by a third party?				

CONSEQUENCE MINIMIZATION				
	Y	N	NA	Comment
Planning:				
Has the owner/operator developed an emergency response plan that specifically addresses release scenarios developed from the PHA/HR and historical information?				
Does the plan identify potential release scenarios and their potential impacts on the public and the environment?				
Is there an emergency response plan to respond to emergency situations based on the accidental release scenarios?				
Does the plan clearly identify responsibilities, functions, and contacts for emergency response?				
Does the plan include coordination with local emergency responders?				LEPC/FD?
Are employees trained on emergency response actions?				
Are routine exercises conducted to practice emergency response?				
Is the emergency response plan reviewed and revised as the process changes?				

OBLIGATIONS UNDER THE GENERAL DUTY CLAUSE			
	Y	N	Comment
Has the owner/operator identified hazards, which may result from accidental releases using appropriate hazard assessment techniques?			
Has the owner/operator designed and maintained a safe facility taking such steps as are necessary to prevent Releases?			
Has the owner/operator minimized the consequences of accidental releases that do occur?			

Date of Inspection/Audit	
Inspector/Auditor Name and Affiliation	
Inspector/Auditor Signature	