# CAPP PROGRAM LEVEL 3 INSPECTION

# Facility:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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# AI #:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Facility Rep:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

# Process Audited:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Inspector:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

# Date(s): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# General Requirements [68.12]

**68.12 (a) – (d) Has the owner or operator complied with the applicable requirements of the rule?**

**Yes  No  N/A**

**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 — Review and Update [68.36]

**68.36 (a) Has the owner/operator reviewed and updated the offsite consequence analyses at least once every five years?**

**Yes  No  N/A**

**(b) If changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more, was a revised analysis completed within six months of the change and a revised risk management plan submitted?**

**Yes  No  N/A**

# Hazard Assessment — Documentation [68.39]

**Has the owner operator maintained the following records on the offsite consequence analyses:**

**68.39 (a) For the worst-case scenarios, a description of the vessel or pipeline and substance selected as worst case, assumptions and parameters used and rationale for selection?**

**Yes  No  N/A**

**(b) For the alternate release scenarios, a description of the scenarios identified, assumptions and parameters used, and the rationale for the selection of specific scenarios?**

**Yes  No  N/A**

**(c) Documentation of estimated quantity released, release rate, and duration of release?**

**Yes  No  N/A**

**(d) Methodology used to determine distance to endpoints?**

**Yes  No  N/A**

**(e) Data used to estimate population and environmental receptors potentially affected?**

**Yes  No  N/A**

# Five-Year Accident History [68.42]

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

**Yes  No  N/A**

**(b) For each accidental release has the owner/operator reported the required information:**

**(1) Date, time and approximate duration of the release?**

**Yes  No  N/A**

**(2) Chemicals released?**

**Yes  No  N/A**

**(3) Estimated quantity released (and for mixtures containing regulated toxic substances, percentage concentration by weight of the regulated toxic substance in the liquid mixture)?**

**Yes  No  N/A**

**(4) NAICS code?**

**Yes  No  N/A**

**(5) Type of release and its source?**

**Yes  No  N/A**

**(6) Weather conditions, if known?**

**Yes  No  N/A**

**(7) On-site impacts?**

**Yes  No  N/A**

**(8) Known offsite impacts?**

**Yes  No  N/A**

**(9) Initiating event and contributing factors, if known**

**Yes  No  N/A**

**(10) Offsite responders notified?**

**Yes  No  N/A**

**(11) Operational or process changes that resulted from investigation?**

**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 and kept the information up-to-date?**

**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) *The identification of any previous 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 work in or maintain 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?***

**Yes  No  N/A**

**(b) Were all incident investigations initiated no 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 the investigation*?**

**Yes  No  N/A**

**Does every report, at a minimum, 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**

1. ***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 the 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**

**(4) Has the owner or operator performed the annual emergency response coordination activities required under §68.93?**

**Yes  No  N/A**

(5) Has the owner or operator performed the notification exercises before 12/19/2024, and annually thereafter as required under §68.96(a)?

Yes  No  N/A

**Emergency Response — Program [68.93]**

**68.93 (a) Has the owner or operator coordinated 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.**

**Yes  No  N/A**

**(b) Has coordination included providing the local emergency planning and response organizations with:**

**The stationary source’s emergency response plan if one exists?**

**Yes  No  N/A**

**Emergency action plan?**

**Yes  No  N/A**

**Updated emergency contact information?**

**Yes  No  N/A**

**Other information necessary for developing and implementing the local emergency response plan?**

**Yes  No  N/A**

**For responding stationary sources, does coordination also include consulting with local emergency response officials to establish appropriate schedules for field and tabletop exercises required under 68.96(b)?**

**Yes  No  N/A**

**Has the owner or operator requested an opportunity to meet with the LEPC (or equivalent) and/or local fire department as appropriate to review and discuss the materials?**

**Yes  No  N/A**

**(c) Has the owner or operator documented coordination with local authorities?**

**Yes  No  N/A**

**Does documentation include:**

**The names of individuals involved and their contact information (phone number, email address, and organizational affiliations?**

**Yes  No  N/A**

**Dates of coordination activities; and**

**Yes  No  N/A**

**Nature of coordination activities?**

**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 the appropriate Federal, state, 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 or new information obtained from coordination activities, emergency response exercises, incident investigations, or other available information, 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**

**Emergency Response — Program [68.96]**

*68.96 (a) Has the owner or operator conducted, at least once each calendar year, an exercise of the stationary source’s emergency response notification mechanisms required under 68.90(b)(3) or 68.95(a)(1)(i), as appropriate, before December 19, 2024?*

*Yes  No  N/A*

*(b) Has the owner or operator of a stationary source subject to the requirements of 68.95 developed and implemented an exercise program for its emergency response program, including the plan required under 68.95(a)(1)?*

*Yes  No  N/A*

*Have the exercises involved facility emergency response personnel and, as appropriate, emergency response contractors?*

*Yes  No  N/A*

*When planning emergency response field and tabletop exercises, has owner or operator coordinated with local public emergency response officials and invited them to participate in the exercise?*

*Yes  No  N/A*

*Does the emergency response exercise include the following elements:*

*Conducting a field exercise involving the simulated accidental release of a regulated substance?*

*Yes  No  N/A*

1. *Consulting with local emergency response officials to establish an appropriate frequency for field exercises as required by 68.93?*

*Yes  No  N/A*

1. *Involving tests of the source’s emergency response plan, including deployment of emergency response personnel and equipment, in the field exercise?*

*Yes  No  N/A*

1. *Conducting a tabletop exercise involving the simulated accidental release of a regulated substance?*

*Yes  No  N/A*

1. *Consulting with local emergency response officials to establish an appropriate frequency for tabletop exercises as required by 68.93?*

*Yes  No  N/A*

*Has the owner or operator conducted the tabletop exercise before December 21, 2026, and at a minimum of at least once every three years thereafter?*

*Yes  No  N/A*

1. *Discussing the source’s emergency response plan, and at a minimum, including:*

*Procedures to notify the public and appropriate Federal, state, and local emergency response agencies?*

*Yes  No  N/A*

*Procedures and measures for emergency response including evacuations and medical treatment?*

*Yes  No  N/A*

*Identification of facility emergency response personnel and/or contractors and their responsibilities?*

*Yes  No  N/A*

*Coordination with local emergency responders?*

*Yes  No  N/A*

*Procedures for emergency response equipment deployment?*

*Yes  No  N/A*

*Any other action identified in the emergency response plan, as appropriate?*

*Yes  No  N/A*

1. *Has the owner or operator prepared an evaluation report within 90 days of each field and tabletop exercise?*

*Yes  No  N/A*

*Does the report include:*

*A description of the exercise scenario?*

*Yes  No  N/A*

*Names and organizations of each participant?*

*Yes  No  N/A*

*An evaluation of the exercise results including lessons learned?*

*Yes  No  N/A*

*Recommendations for improvement or revisions to the emergency response exercise program and emergency response program?*

*Yes  No  N/A*

*A schedule to promptly address and resolve recommendations?*

*Yes  No  N/A*

| **Compliance Dates: [Assuming December 2019 Final Rule Effective Date]** | |
| --- | --- |
| **What** | **Due Date** |
| Public Meetings | Within 90 days of any qualifying accident that occurs after March 15, 2021 |
| Develop Emergency Response Programs | Within three years of owner or operator determining that facility is subject to the provisions |
| Develop exercise plans and schedules | December 2023 |
| Conduct first notification drill | December 2024 |
| Conduct first tabletop exercise | December 2026 |
| Conduct first field exercise | According to the exercise schedule established by the owner or operator in coordination with local response agencies |
| Submit RMP with new information elements | The owner or operator would provide new information elements with any initial RMP or RMP resubmission made after December 2024. |
| Comply with new emergency coordination requirements | Already in effect as of September 21, 2018 |
| Comply with remaining minor accident prevention provisions | Already in effect as of September 21, 2018 |