



RISK MANAGEMENT PROGRAM CHECKLIST
PROGRAM 2 FACILITIES
(Anhydrous Ammonia)

Facility Name _____

Person Responsible For Implementing Risk Management Program
(print) _____

Alternate Person Responsible For Implementing Risk Management Program
(print) _____

Date _____

**Place an X in the box next to each task that has been completed.*

Hard copy of the most recent RMP is on file at this location in _____

40 CFR 68.48---Safety Information

This facility has compiled and maintained the following up to date safety information related to equipment used to store, transfer and transport anhydrous ammonia in _____ [68.48(a)] *(i.e. main office)*

Material Safety Data Sheet (MSDS) for anhydrous ammonia is on hand and easily accessible to employees who store, transfer or transport anhydrous ammonia. [68.48(a)(1)]

Maximum intended inventory of anhydrous ammonia stored in Storage Tanks is _____ lbs [68.48(a)(2)]

Maximum intended inventory of anhydrous ammonia stored in Nurse Tanks is _____ lbs [68.48(a)(2)]

Safe upper and lower temperatures, pressures, flows, and compositions are maintained on file in _____ [68.48(a)(3)]

Manuals for equipment used to store, transfer and transport anhydrous ammonia are maintained on file in _____ [68.48(a)(4)]

- Codes and standards used to design, build and operate the process are maintained on file in _____ [68.48(a)(5)]

- The person responsible for implementing the Risk Management Program ensures the process used to store, transfer, and transport anhydrous ammonia is designed in compliance with recognized and generally accepted good engineering practices.
- Compliance with Federal or State regulations that address industry-specific safe design or with industry-specific design codes included but not limited to American National Standards Institute (ANSI) used to demonstrate compliance with this paragraph are maintained on file in _____ [68.48(b)]

- The person responsible for implementing the RMP updates all safety information pertaining to the storage, transfer and transport of anhydrous ammonia anytime a major change occurs that makes the information inaccurate. This information is located in _____ [68.48(c)] (*i.e. main office*)

40 CFR 68.50---Hazard Review

- The person responsible for implementing the RMP has conducted a Review of the Hazards Associated with the storage; transfer and transportation of anhydrous ammonia by filling out the Hazard Review “what if” exercise. The hazard review is maintained on file in _____ [68.50(a)(1-4) 68.50(b)-(c)] (*Refer to Hazard Review Checklist developed by IFCA and Asmark Institute*)

- The person responsible for implementing the RMP has updated the Hazard Review once every five years or whenever a major change in the storage, transfer and transport of anhydrous ammonia occurred and has resolved all issues identified in the review before startup of the storage, transfer and transport of anhydrous ammonia. Date any issues have been resolved (*N/A if no issues need to be resolved*) _____ [68.50(d)]

40 CFR 68.52---Standard Operating Procedures (SOP)

- The person responsible for implementing the Risk Management Program at this facility has prepared **written** operating procedures that provide clear instructions or steps for safely conducting activities associated with the storage, transfer and transport of anhydrous ammonia which is consistent with the safety information associated with the storage, transfer and transport of anhydrous ammonia. [68.52(a)]

The standard operating procedures for the storage, transfer and transport of anhydrous ammonia address the following:

- Initial startup of process [68.52(b)(1)]
- Normal operations of the process [68.52(b)(2)]

- Temporary Operations of the process [68.52(b)(3)]
- Emergency shutdown procedures and operations [68.52(b)(4)]
- Normal shutdown of the process [68.52(b)(5)]
- Startup following a normal or emergency shutdown or a major change that requires a hazard review [68.52(b)(6)]
- Consequences of deviations from operating procedures and steps required to correct or avoid deviations from operating procedures [68.52(b)(7)]
- Inspection of equipment used to store, transfer or transport anhydrous ammonia [68.52(b)(8)]
- The person responsible for the RMP shall ensure that the operating procedures are updated, if necessary, whenever a major change occurs and prior to startup of the changed process [68.52(c)]
- Standard operating procedures are located in _____ (*i.e. main office*)

40 CFR 68.54---TRAINING

- The person responsible for implementing the RMP certifies that each employee who stores, transfers or transports anhydrous ammonia and each employee newly assigned to storing, transferring or transporting anhydrous ammonia has been trained or tested as a competent attendant in the operating procedures of the storage, transfer and transport of anhydrous ammonia at this facility. [68.54(a)]
- Refresher training is provided at least once every three years or more often if necessary to each employee who stores, transfers or transports anhydrous ammonia to ensure that each employee understands and adheres to the current operating procedures at this facility. [68.54(b)]
- The person responsible for implementing the RMP has determined, in consultation with the employees who store, transfer or transport anhydrous ammonia, the appropriate frequency of the training. [68.54(c)]
- The person responsible for the implementation of the RMP at this facility certifies that each employee has been trained in any updated or new procedures prior to startup of a process after a major change has occurred. [68.54(d)]
- Certificates of training are on file in _____ (*i.e. main office*)

(Refer to the IFCA training manual for Anhydrous and Aqua Ammonia to assist in developing written operating procedures for this facility)

40 CFR 68.56---Maintenance

- The person in charge of implementing the RMP has implemented procedures to maintain the on-going mechanical integrity of the equipment used to store, transfer and transport anhydrous ammonia. [68.56(a)] ***(Refer to the mechanical integrity manual offered by IFCA and Asmark Institute)***

- The person responsible for implementing the RMP certifies that; each employee involved in the on-going mechanical integrity of the equipment used to store, transfer and transport anhydrous ammonia as well as the hazards associated with the process of storing, transferring and transporting anhydrous ammonia, are trained in how to avoid or correct unsafe conditions and procedures applicable to the employee's job tasks. [68.56(b)]

- If this facility uses a contractor to perform maintenance on equipment used to store, transfer or transport anhydrous ammonia, the contractor is trained to perform the maintenance procedures developed. [68.56(c)]

- The person responsible for the implementation of the RMP has performed inspections and tests on equipment used to store, transfer or transport anhydrous ammonia that follow recognized and accepted engineering practices. [68.56(d)]

- Maintenance records of equipment used to store, transfer or transport anhydrous ammonia are maintained on file in _____ *(i.e. main office)*

40 CFR 68.58---Compliance Audits

- The person responsible for implementing the RMP certifies they have evaluated compliance with the provisions of this subpart at least every three years to verify the procedures and practices are adequate and being followed. [68.58(a)]

- The compliance audit has been conducted by at least one person knowledgeable in the storing, transfer and transport of anhydrous ammonia.[68.58(b)].

- The person responsible for implementing the RMP has developed a report of the audits findings. [68.58(c)] ***(Refer to the compliance audit form offered by IFCA and Asmark Institute)***

- The person responsible for implementing the RMP has promptly determined and documented an appropriate response to each of the findings of the compliance audit and documented that deficiencies have been corrected. [68.58(d)] ***(Refer to the compliance audit form offered by IFCA and Asmark Institute)***

- The person responsible for implementing the RMP has retained the two most recent compliance audit reports, unless they are more than five years old. [68.58(e)]
- The compliance audit is maintained on file in _____ (i.e. main office)

40 CFR 68.60---Incident Investigation

- The person responsible for implementing the RMP has investigated each incident which resulted in, or could reasonably result in a catastrophic release of anhydrous ammonia. [68.60(a)] (*Refer to the incident investigation form offered by IFCA and Asmark Institute*)
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40 CFR 68.95—Emergency Response Program

- The person responsible for implementing the RMP has developed and implemented an
- Emergency Response Program for the purpose of protecting public health and the environment. Such program shall include the following elements: [68.95(a)]
 - Procedures for informing the public and local emergency response agencies about accidental releases [68.95 (a)(1)(i)]
 - Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures [68.95(a)(1)(ii)]
 - Procedures and measures for emergency response after an accidental release of a regulated substance [68.95(a)(1)(iii)]
 - Procedures for the use of emergency response equipment and for its inspection, testing and maintenance [68.95(a)(2)]
 - Training for all employees in relevant procedures [68.95(a)(3)]
 - 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 [68.95(a)(4)]

*Although comprehensive in scope, this checklist should only be used as a tool to assist the person responsible in gaining compliance with their Risk Management Program. The Risk Management Program should be site specific to each facility and IFCA makes **no** claim that this checklist brings this facility to 100% compliance with this facilities Risk Management Program.*