



Compliance Self Audits

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SAFEGUARDING LIFE AND PROPERTY



Regulations

- Federal Risk Management Programs (RMP) for Chemical Accident Prevention Program, 40 CFR 68.79.
- California Accidental Release Prevention Program (CalARP), 19 CCR 2760.8, and,
- California Process Safety Management (PSM) of Acutely Hazardous Materials, 8 CCR 5189(o).



Requirement

- a) The owner or operator shall certify that they have evaluated compliance with the provisions of this article at least every three years to verify that the procedures and practices developed under the chapter are adequate and are being followed.
- b) The compliance audit shall be conducted by at least one person knowledgeable in the process.
- c) A report of the findings of the audit shall be developed.
- d) The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.
- e) The owner or operator shall retain the two most recent compliance audit reports.



Tip #1

Synchronize with your CUPA:

AA is looking for certification you have evaluated and verified your:

- PSM/RMP management procedures and practices are adequate and are being followed,
- SOP's are current, accurate, and implemented, and,
- Process technology and equipment, as built and operated, are in accordance with your process safety information.



Tip #2

Use a comprehensive checklist:

Great place to start – go to:

<http://www.nj.gov/dep/rpp/brp/tcpa/tcpadown.htm>



Tip #3

Find something to improve:

No program is perfect, if you don't find anything to improve you probably didn't do much of an audit.

Also, remember this is a perfect place to clearly state what you plan to improve about your program – this should then be part of the executive summary component of your RMP submittal.



Tip #4

Produce a written report:

Be certain it contains the required information:

- What you did (checklist),
- Who did it (competent person, team),
- When it was done (annually/3 years),
- What was found (findings),
- What are the intended actions (action items).



Summary

1. Know what you must accomplish.
2. Use a comprehensive, documented approach.
3. Create a report with findings and follow-up on it.