PSM/RMP Compliance Audit

Program Audit Checklist

Facility Name:	
Auditor:	
Date:	
Audit Period:	

Regulatory References

The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.

Regulation / Guidance Document
29 CFR 1910.119 — Process Safety Management of Highly Hazardous Chemicals
29 CFR 1910.119 Appendix A — List of Highly Hazardous Chemicals (TQs)
29 CFR 1910.119 Appendix C — Compliance Guidelines (Nonmandatory)
40 CFR Part 68 — Chemical Accident Prevention Provisions (RMP Rule)
OSHA PSM Enforcement Directive CPL 2-2.45A CH-1
OSHA Publication 3132 — Process Safety Management Guide
EPA RMP*eSubmit — Risk Management Plan Submission Portal

Instructions: Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

Employee Participation and Process Safety Information

Audit Item	Expected Finding	Status	Notes / Evidence
Employee participation plan	Written plan exists for employee participation in PSM program development and conduct. Employees have access to PHAs, incident investigations, and other PSM elements. Consultation with employees on PSM program development is documented. *» Ref: 29 CFR 1910.119(c)*		
Chemical hazard information	Process safety information includes MSDS/SDS for all highly hazardous chemicals in the process. Information covers toxicity, permissible exposure limits, physical data, reactivity data, corrosivity data, and thermal/chemical stability data. *» Ref: 29 CFR 1910.119(d)(1)*		
Process technology information	Documentation includes block flow or process flow diagrams, process chemistry, maximum intended inventory, safe upper and lower operating limits, and consequences of deviations. Material and energy balances are available for processes designed after May 26, 1992. *» Ref: 29 CFR 1910.119(d)(2)*		

Audit Item	Expected Finding	Status	Notes / Evidence
Equipment information	Documentation includes materials of construction, P&IDs, electrical classification, relief system design and basis, ventilation system design, design codes and standards, and safety systems (interlocks, detection, suppression). Equipment complies with RAGAGEP. » *Ref: 29 CFR 1910.119(d)(3)*		

Process Hazard Analysis

Audit Item	Expected Finding	Status	Notes / Evidence
PHA completion and currency	Initial PHA has been completed for each covered process. PHAs are updated and revalidated at least every five years. Current revalidation is within the five-year cycle. All covered processes have a current PHA. » *Ref: 29 CFR 1910.119(e)(1), (6)*		
PHA methodology and team	Appropriate PHA methodology is used (What-If, Checklist, What-If/Checklist, HAZOP, FMEA, Fault Tree, or equivalent). Team includes at least one member with process-specific expertise, one with PHA methodology expertise, and one employee with process operating experience. » *Ref: 29 CFR 1910.119(e)(2), (4)*		
PHA scope and content	PHA addresses: hazards of the process, previous incidents with catastrophic potential, engineering and administrative controls, consequences of control failures, facility siting, human factors, and a qualitative evaluation of safeguards. Findings are documented. » *Ref: 29 CFR 1910.119(e)(3)*		
PHA recommendation resolution	All PHA recommendations are resolved and documented with a timetable. Resolutions are communicated to affected personnel. Unresolved recommendations are tracked and justified. Management response to each recommendation is documented. » *Ref: 29 CFR 1910.119(e)(5)*		

Operating Procedures, Training, and Contractors

Audit Item	Expected Finding	Status	Notes / Evidence
Operating procedure adequacy	Written operating procedures exist for each covered process covering: normal operations (startup, shutdown, steady state), emergency operations, and temporary operations. Procedures address operating limits, consequences of deviation, steps to avoid exceeding limits, and safety and health considerations. » *Ref: 29 CFR 1910.119(f)(1)*		
Operating procedure certification	Operating procedures are reviewed as often as necessary to ensure they reflect current operations. Procedures are certified as current and accurate annually. Certification is documented with date and certifier.		

Audit Item	Expected Finding	Status	Notes / Evidence
	» Ref: 29 CFR 1910.119(f)(3)-(4)		
Employee training	Initial training includes an overview of the process and operating procedures with emphasis on specific hazards, emergency operations, and safe work practices. Refresher training is conducted at least every three years. Training documentation includes identity of employee, date, and means of verification. » Ref: 29 CFR 1910.119(g)(1)-(3)		
Contractor management	Host employer evaluates contractor safety performance and programs. Contractors are informed of known hazards, emergency action plan, and applicable safe work practices. Contractor injury/illness log is maintained for the process area. Contractor performance is periodically evaluated. » Ref: 29 CFR 1910.119(h)(1)-(3)		

Pre-Startup, Mechanical Integrity, and Hot Work

Audit Item	Expected Finding	Status	Notes / Evidence
Pre-startup safety review	PSSR is conducted for new and modified facilities before startup. Review confirms: construction per design specs, safety/operating/maintenance/emergency procedures in place, PHA recommendations resolved, modified MOC requirements met, and training completed. » Ref: 29 CFR 1910.119(i)(1)-(3)		
Mechanical integrity program	Written procedures exist for maintaining the ongoing integrity of process equipment: pressure vessels, storage tanks, piping systems, relief and vent systems, emergency shutdown systems, controls and pumps. Inspection and testing frequencies follow RAGAGEP (API, ASME, NBIC codes). » Ref: 29 CFR 1910.119(j)(1)-(2)		
Inspection and testing execution	Inspections and tests are performed at documented intervals by qualified personnel. Results are documented and deficiencies are corrected before further use or in a safe and timely manner. Equipment deficiency log is maintained and tracked to resolution. » Ref: 29 CFR 1910.119(j)(4)-(5)		
Hot work permit program	Hot work permits are issued for all hot work operations on or near covered processes. Permits document that fire prevention and protection requirements (29 CFR 1910.252(a)) are implemented. Permits indicate authorized date(s) and identify the work object. Permits are retained until completion. » Ref: 29 CFR 1910.119(k)		

Management of Change and Incident Investigation

Audit Item	Expected Finding	Status	Notes / Evidence
MOC program	Written MOC procedures address changes to process chemicals, technology, equipment, procedures, and facilities affecting covered processes. Procedures cover: technical basis for change, impact on safety and health, modifications to operating procedures, necessary timeframe, and authorization requirements. » *Ref: 29 CFR 1910.119(l)(1)*		
MOC implementation	MOC reviews are completed and documented before implementing changes (except replacements in kind). Affected employees are informed of and trained on changes before startup. Process safety information and operating procedures are updated. P&IDs reflect all changes. » *Ref: 29 CFR 1910.119(l)(2)-(5)*		
Incident investigation	Incidents resulting in or that could reasonably have resulted in a catastrophic release are investigated within 48 hours. Investigation team includes at least one person knowledgeable in the process and other persons with appropriate expertise. Findings are documented. » *Ref: 29 CFR 1910.119(m)(1)-(4)*		
Investigation follow-up	Investigation report addresses factors contributing to the incident and recommendations. Recommendations are resolved and documented. Reports are reviewed with affected personnel. Reports are retained for five years. » *Ref: 29 CFR 1910.119(m)(5)-(7)*		

Emergency Planning and RMP Requirements

Audit Item	Expected Finding	Status	Notes / Evidence
Emergency action plan	Written EAP per 29 CFR 1910.38 is established for the entire plant. Plan includes procedures for handling small releases of HHCs in addition to standard EAP elements. EAP is coordinated with local emergency response agencies. » *Ref: 29 CFR 1910.119(n)*		
RMP hazard assessment	Worst-case release scenario and alternative release scenario analyses are documented. Offsite consequence analysis uses EPA-approved methodology (RMP*Comp or equivalent). Five-year accident history is compiled and included in the RMP submission. » *Ref: 40 CFR 68.20-68.42*		
RMP submission and updates	RMP is submitted to EPA and is current. Plan is updated within five years of initial submission, within three years of a change triggering applicability, or when changes at the facility alter the information in the RMP. Amendments are filed through EPA's CDX/RMP*eSubmit system. » *Ref: 40 CFR 68.150-68.190*		
RMP prevention program	Program 3 facilities implement prevention program elements equivalent to OSHA PSM (all 14 elements). Program 2 facilities implement a		

Audit Item	Expected Finding	Status	Notes / Evidence
	prevention program with hazard review, operating procedures, training, maintenance, compliance audits, and incident investigation at minimum. » Ref: 40 CFR 68.65-68.87 (Program 3)		

Compliance Audit Program

Audit Item	Expected Finding	Status	Notes / Evidence
Audit frequency and coverage	Compliance audit has been conducted within the last three years. Audit covers all 14 elements of 29 CFR 1910.119 for each covered process. Audit scope, schedule, and team composition are documented in the audit plan. » Ref: 29 CFR 1910.119(o)(1)		
Auditor qualifications	At least one audit team member is knowledgeable in the specific process being audited. Team members have appropriate expertise in PSM auditing methodology. Auditors are objective and do not audit their own work areas. » Ref: 29 CFR 1910.119(o)(2)		
Findings and corrective actions	Audit report documents all findings with specific references to the PSM element and regulatory provision. Employer has promptly determined and documented an appropriate response to each finding. Deficiencies have been corrected on the documented timetable. » Ref: 29 CFR 1910.119(o)(3)-(4)		
Audit record retention	The two most recent compliance audit reports are retained. Reports document audit team members, scope, methodology, findings, and corrective action responses. Supporting documentation (interview notes, document review records) is organized and retrievable. » Ref: 29 CFR 1910.119(o)(5)		

Corrective Actions Summary

#	Finding	Corrective Action	Responsible	Due Date
1				
2				
3				
4				
5				

Audit Sign-Off

Auditor Name:

Auditor Signature:

Date Completed:

Reviewed By:

Review Date:

Status Key: C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review