



<p>Standard Operating Instruction – EMS-0100.009C Name: Risk Management Plan Compliance Audit/Evaluation Inspection for Wastewater Treatment Plants</p>	<p>Corresponding Requirements: ISO Standard: 4.5.1 EMS Manual: 4.5.1 RMP Manual: WCR-0100.008 WLC-0100.008</p>
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<p>Approved By: Steve Oakley, Laboratory Supervisor/WWTD RMP Program Coordinator</p> <p>Signature: _____</p>	<p>Effective Date: 3-27-01</p> <p style="text-align: right;">Page 1 of 1</p>

Standard Operating Instruction

1.0 Purpose

- 1.1 The following procedure provides guidance for conducting Risk Management Program inspections of Wastewater Treatment Plants that use Chlorine and Sulfur Dioxide. The inspection helps to ensure proper operation and compliance with relevant environmental legislation and regulations. EPA requires an audit of the Risk Management Program every three years.

2.0 Associated Documents

- 2.1 Site Specific Risk Management Program Manual – WCR-0100.008 or WLC-0100.008
- 2.2 Site Specific Emergency Action Plan - WCR-0100.010 or WCR-0100.010
- 2.3 Emergency Operations Plan – EMS-0100.010
- 2.4 Completed RMP Compliance Audit Reports – EMS-0101.009C

3.0 Procedure

Plant inspection involves reviewing the following aspects of proper plant operation as outlined in the RMP Compliance Audit Format in Appendix A using the RMP Audit form EMS-0101.009C:

- 3.1 Review Documents Describing Facility and Program
- 3.2 Physical Inspection
- 3.3 Assessment of Operations with Standard Operating Procedures
- 3.4 Risk Management Program Audit Report

4.0 Documentation & Record Keeping

- 4.1 Results from the audit should be documented on form EMS-0101.009C: Risk Management Program Audit Report. Deficiencies and recommendations will be re-evaluated 90 days from initial audit date. Form EMS-0101.009C will be used to report re-evaluation audit.
- 4.2 Copies of this report should be sent to the Facility ORC, the Assistant Superintendent of the Wastewater Treatment Division (WWTD) Superintendent of WWTD and Public Works Director.
- 4.3 A copy of the report should be maintained for five years in the files of the Risk Management Program Coordinator.

5.0 Environmental Impacts

- 5.1 The environmental aspects of chlorine and sulfur dioxide may be affected by this procedure.
- 5.2 This procedure helps ensure that the wastewater treatment facility manages the operation of the chlorine and sulfur dioxide processes effective, efficiently and in accordance with EPA and OSHA regulations to eliminate and/or minimize any impact on the environment from this process.
- 5.3 Not following this procedure could allow chlorine and/or sulfur dioxide to be release into the air either in small or large amounts and create a dangerous work environment and potentially cause the evacuation plans to be enacted due to the dangers of these chemicals. A release of either of these chemicals will cause negative impacts on the air of the surrounding environment.

6.0 Appendices

- 6.1 Appendix A: RMP Compliance Audit Format

7.0 Deviations from this procedure must be documented by completing a Corrective/Preventative Action Report (EMS-0101.004)

Appendix A: Risk Management Program Compliance Audit Format

- **TASK 1.0 Review Documents Describing Facility and Program**

- 1.1 Program Management Procedure See Section 2 RMP
(WCR-0100.008 & WLC-0100.008)
- 1.2 Process Safety Information See Section 3 RMP
- 1.3 Process Hazard Analysis See Section 4 RMP
- 1.4 Employee Training See Section 5 RMP
- 1.5 Standard Operations Procedures See Section 6 RMP
- 1.6 Standard Health and Safety Precautions See Section 7 RMP
- 1.7 Contractor Safety Program See Section 8 RMP
- 1.8 Emergency Response See Section 9 RMP

- **TASK 2.0 Physical Inspection**

- 2.1 Mechanical Equipment
- 2.2 Associated Instrumentation and Control System
- 2.3 Emergency Equipment
- 2.4 Process Flow Diagrams
- 2.5 Piping and Instrument Diagrams
- 2.6 Safety Relief Devices and Emergency Systems
- 2.7 Back-up Systems
- 2.8 Alarms Systems

- **TASK 3.0 Assessment of Facility Operations with Standard Operating Procedures**

- 3.1 Assessment of Personnel with Standard Operating Procedures

- **TASK 4.0 Risk Management Program Audit Report**

- 4.1 Audit Overview
- 4.2 Deficiencies of RMP
- 4.3 Recommendations and Schedule for Remediation
- 4.4 Recommendation Follow Up Review