APPENDIX 2

CONTAINMENT AND MITIGATION CHECKLIST

This checklist is a Process Hazard Analysis tool for evaluating a facility's mitigation features to prevent, detect or control potential releases of acute toxic substances.

The management of any plant or facility requiring review should complete this checklist as part of the preparation for a Chemical Exposure Index review. Please check those that are complete, operational or in compliance with known company rules, guidelines or requirements. Any item that cannot be checked should be marked with the percentage of completion. Be prepared to discuss plans for any item not completed.

Complete (✓)	Risl	k Reducing Factors
	1.	All pressure vessel and relief device systems properly registered and inspection up to date and documentation complete. (No expansion joints or glass devices.)
	2.	All hoses inspected and tested regularly.
	3.	All operational controls and systems designed and routinely tested to "fail-safe."
	4.	Critical Instrument Program up to date (e.g., redundant high level and temperature alarms, shutdowns, etc.)
	5.	Operating Discipline complete and up to date.
	6.	Vapor Detectors properly placed and tested regularly.
	7.	Appropriate engineering specifications properly applied (e.g., lethal service, welded fittings, etc.)
	8.	Are relief vents on toxic containers designed to minimize atmospheric emissions? How? (circle) Scrubber, Flare or
	9.	Failure analysis and nondestructive testing carried out where needed (e.g., X-ray, vibration analysis or monitoring, acoustical emission, piping flexibility – hot and cold).
	10.	Physical barriers in place (for traffic, cranes, etc.)
-	11.	Designed for excess pressure, if needed (e.g., pipelines in certain areas, tank cars, trucks, etc.).
	12.	All personnel properly trained to understand hazards and emergency responses.
	13.	Emergency Procedures (relating to this exposure potential) in place and annual drill held.
	14.	Safety Rules and Safety Standards regularly reviewed and enforced.
	15.	Loss Prevention Principles and Minimum Requirements appropriately applied.
	16.	Technology Center Guidelines appropriately incorporated.
	17.	Reactive Chemical Review complete and up to date.
	18.	Loss Prevention Audit complete and up to date.
	19.	Technology Center Audit complete and up to date.
	20.	All new operations and modifications underwent safety pre-startup audit.
	21.	Management of Change procedures written and utilized.
Completed by: Reviewed by:		Date: