

ERP AUDIT TOOL

This ERP Audit Tool is designed to evaluate the completeness, accuracy, and effectiveness of a facility's Emergency Response Plan (ERP) in alignment with OSHA 29 CFR 1910.38, 1910.119, NFPA 1660, and DHS Chemical Facility Anti-Terrorism Standards (CFATS). It is used by IES Safety, LLC auditors and clients during ERP readiness reviews, annual compliance evaluations, and joint response planning.

Section 1: Administrative and Regulatory Compliance

Does the ERP include a current and approved version number with revision history?

Is the ERP signed and authorized by facility leadership?

Does the ERP comply with OSHA 29 CFR 1910.38 (EAP) and 1910.119(n) (PSM emergency planning requirements)?

Are facility-specific regulatory obligations (e.g., RMP, CFATS, EPCRA) identified and addressed?

Are plan components aligned with NFPA 1660 (Standard on Continuity, Emergency, and Crisis Management)?

Section 2: Organizational Structure and Roles

Is the Incident Command System (ICS) clearly defined and implemented?

Are roles and responsibilities documented for each response team member?

Are contact lists for internal and external resources maintained and updated?

Is there a designated Emergency Response Coordinator (ERC) for the site?

Section 3: Hazard Identification and Risk Scenarios

Has the facility conducted a Process Hazard Analysis (PHA) or HAZOP that informs ERP development?

Are credible worst-case and alternate-case scenarios documented?

Are there pre-incident plans for each major hazard (e.g., flammable release, toxic gas, confined space incident)?

Are hazard-specific response procedures included in the ERP?

Section 4: Notification and Communication Protocols

Are emergency notification systems functional and tested regularly?

Are there internal alerting mechanisms (e.g., radios, alarms, mass notification systems)?

Are public emergency services (fire, EMS, LE) integrated into notification protocols?

Are communication redundancies in place (e.g., backup radios, satellite phones)?

Section 5: Training and Exercises

Is emergency response training documented and current for all personnel?

Are drills conducted at least annually and evaluated for effectiveness?

Are contract responders included in joint exercises?

Are lessons learned from exercises incorporated into ERP updates?

Section 6: Equipment and Resources

Is emergency equipment (e.g., PPE, SCBAs, fire suppression tools) inventoried and maintained?

Are maps, SDSs, facility schematics, and equipment manuals available to responders?

Are staging areas, command posts, and safe refuges designated and identified in the plan?

Are mutual aid resources or MOUs documented and current?

Section 7: ERP Maintenance and Continuous Improvement

Is there a scheduled review process (e.g., annual ERP audit or after-action review)?

Are revisions tracked and distributed to all stakeholders?

Is there a corrective action tracking mechanism?

Are performance metrics used to assess response capabilities?