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RMP*Submit 2004™ User's Manual

RMP SERIES

What's New for 2004

RMPs must be fully updated and re-submitted at least once every five years. Most RMPs were submitted by the initial deadline of June 21, 1999, so they must be updated and re-submitted by June 21, 2004, unless they were updated and re-submitted previously. EPA is releasing RMP*Submit 2004 to facilitate RMP re-submissions in calendar year 2004.

Importing your old data: RMP*Submit 2004 can import your older versions of RMPs. When RMP*Submit imports these older versions, it will check the NAICS code, the county name, the DUNS number, and the lat/long and display any errors found.

Improved features:
- New NAICS selector to help you select your NAICS code;
- Enhanced user interface, including larger screen size and larger fonts;
- Indicators for critical and mandatory fields;
- Improved data validation;
- Updated county name listing; and
- Improved accessibility features and support for Windows High Contrast modes.

Changes to RMP*Submit

In 2004, EPA revised the Agency's Chemical Accident Prevention Rule (Risk Management Program) to include several new data elements in Risk Management Plans (RMPs) and to change several requirements regarding the filing of RMPs.

RMP*Submit 2004 incorporates the new data elements:

a. An e-mail address for the emergency contact person (if an email address exists).
b. Name, address, and telephone number of the consultant/contractor who prepared RMP, if any.
c. The purpose and type of any submission that revises or otherwise affects previously filed RMPs.

RMP*Submit 2004 also reflects the fact that the revised rule eliminates the requirement to include a brief description of your facility's off-site consequence analysis in the RMP Executive Summary.

Other rule changes do not affect RMP*Submit 2004, but you should be aware that the revised rule requires the five-year accident history portion of RMPs (section 6) to be revised within six months of any accident that meets the accident history reporting requirements. Emergency contact information also must be corrected within one month of a change.

WHERE TO GO FOR HELP

RMP Reporting Materials:

Visit our website for updates and information about RMP*Submit, for guidance documents, industry-specific model plans, Off-Site Consequence Analysis specific guidance and calculator, Frequently Asked Questions, Fact Sheets and other information:
http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/RMPS.htm

RMP Contacts:

Under the Clean Air Act section 112, States can choose to take delegation of the RMP Program. If they do, they become the Implementing Agency for that State. In delegated States, you may contact your State Implementing Agency for assistance. In all other States, your EPA regional office is the implementing agency and you may contact them for assistance. We maintain current phone numbers for State and regional contacts on our website:
http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/112r-sts.htm

RMP Regulatory Questions:

If you have a question about an RMP reporting requirement, you can also call the toll free RCRA, Superfund & EPCRA Call Center at:

Phone:	**(800) 424-9346** or **(703) 412-9810** [Washington, DC area callers please use this number]
TTY:	**(800) 553-7672** or **(703) 412-3323** [Washington, DC area callers please use this number]
When:	Monday - Friday, 9:00 am - 5:00 pm Eastern Time Closed Federal Holidays
Internet:	www.epa.gov/epaoswer/hotline
Email:	epacallcenter@bah.com

RMP*Submit Software Support:

For software questions or installation problems, contact the RMP Reporting Center at:

Phone:	**(301) 429-5018**
When:	Monday - Friday, 8:00 am - 4:30pm Eastern Time Closed Federal Holidays
Email:	userrmp.usersupport@epcra.org

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CHAPTER 1 GETTING STARTED

A. Introduction

The RMP*Submit User Manual provides assistance in preparing and submitting Risk Management Plans (RMPs). RMP*Submit software is the free tool EPA developed to facilitate electronic submission and is designed to significantly reduce errors in submission through "checks " for each data element. If you are unable to submit your RMP electronically, submit your RMP on the Risk Management Plan Form (see Chapter 3).

The RMP*Submit User Manual includes:

–Technical help on using RMP*Submit;
–Instructions on how to complete each data element;
–Details on how to submit your RMP; and
–What to expect after you submit.

RMP*Submit has four functions:

- Data Entry - Allows you to add new or edit existing RMPs (first-time submissions, corrections, and re-submissions); check your RMP for completeness; and create the submission file.
- Edit Certification Letters - Allows you to edit the template for the certification letter to accompany your submission (for Program 1, for Program 2 or 3, and for a corrected RMP).
- Import - Allows you to import RMPs from previous versions of RMP*Submit. Also, if you used your own software to create your RMP, you can import the data and use RMP*Submit to verify the "completeness" of your RMP.
- Edit De-registration Letter- Generates a de-registration letter.

This RMP*Submit Manual provides instructions for entering all sections of the RMP. It also includes a copy of the RMP paper form (Appendix A) for those who need to submit their RMP on paper. In addition, Appendices C and D include the necessary forms for claiming Confidential Business Information (CBI), since these forms may not be submitted electronically.

B. Before You Start

–Are you subject to the RMP reporting requirements? Check the requirements, and for updates and re-submissions check your 5-year anniversary date if you already have an RMP in the system.

–What is your EPA Facility ID? If you already have an RMP in the system, you have an EPA Facility ID. It is essential that we match your new RMP to any earlier versions. Your EPA Facility ID appears in a letter sent by the EPA Reporting Center after your first-time submission. The number has twelve digits. Call the EPA Reporting Center if you need help at (301) 429-5018.

First-time submissions should leave the EPA Facility ID blank.

–What category are your processes in: Program 1, 2 or 3? Each process at your facility having more than a specified amount ("threshold quantity") of a covered chemical ("regulated substance") will be in one of these categories. The category determines some of your reporting requirements and governs how you enter the data.

C. Hardware and Software Requirements

RMP is designed to run on Microsoft Windows versions 98, NT 4.0, 2000, ME, and XP. To install and run RMP*Submit, you will need 165 MB of available hard disk space. You will also need a minimum of 16 MB RAM for Windows 98 or a minimum of 32 MB RAM for Windows NT 4.0, 2000, ME, and XP. Listed below are the minimum computer hardware and software requirements for installing and running RMP*Submit:

Personal Computer:	Pentium II or newer
Printer:	Standard inkjet or laser printer
Mouse:	Standard (note: mouse wheel is not supported)

D. Installation Instructions

RMP*Submit can be installed by downloading the program files from the EPA website: http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/ap-rmsb.htm

To install RMP*Submit from Internet download:

1. Using a Web browser, navigate to the EPA Web site and locate and click upon the link to install RMP*Submit (rmpsubmit.exe).

2. When prompted by the Web browser whether to Open or Save the file, select to Open it.

3. Follow the ensuing system prompts. You will be able to save RMP*Submit to a directory of your choice. The default is: C:\Program Files\RMP Submit V3.

The installation program will inform you if the installation was successful. If you encounter problems during installation, follow the instructions provided by the installation program.

Notes for users with dial-up connections

- Downloading RMP*Submit 2004 can take as long as three hours. The progress bar advances as it downloads each installation section from the Web server. Sections that are considerably larger than the others may result in the progress bar not moving for an extended period of time. Please be patient; the progress bar will advance again, once the downloading is complete. If your connection to the Internet is interrupted, the installation will resume where it left off after the connection has been reestablished.

C Dial-up users may wish to download the application over several sessions. In order to do this, perform the following steps:

1. Click on the Progress Meter *Cancel* button during the installation.

2. You will be asked if you would like to Exit or Resume the application. Select *Exit*.

3. If you are prompted to Abort or Retry the installation, select *Abort*.

4. Next, you will be asked if you would like to roll back the installation. Select *No*.

5. When you are ready to continue the installation, using a Web browser, navigate to the EPA Web site and locate and click upon the link to install RMP*Submit (rmpsubmit.exe). Downloading will resume where it was last aborted.

E. Importing Data

You may have RMP data from a previous version of RMP*Submit or another source that you want to import into RMP*Submit 2004. When RMP*Submit 2004 imports older versions, it will check the NAICS code, the county name, the DUNS number, and the lat/long and display any errors found.

L **Tip** If you plan to import old RMPs, do not erase your copy of the previous version of RMP*Submit until you have successfully imported the data into RMP*Submit 2004.

To import data from a previous version of RMP*Submit, you will need a copy of your RMP submission file called "rmp.txt." You may have copied this file to either a diskette or your hard drive.

If you don't have a copy of the submission file, but do have a copy of a previous version of RMP*Submit, you can generate the submission file using the previous version.

To create a copy of your submission file, open the earlier version of RMP*Submit and:

1. Select an RMP from the List of Risk Management Plans Screen and click the **Submit** button.

2. Next, RMP*Submit prompts you to enter an output drive letter.

3. Enter the drive where you want to save your RMP. The RMP filename will be **rmp.txt**.

If you need an electronic copy of your RMP submission file, you may call the RMP Reporting

Center at (301 429-5018), or contact your State Implementing Agency. Because of security concerns pertaining to the off-site consequence analysis portions of RMPs, you will be asked to provide documentation of your position at the facility before EPA or another agency provides you with the electronic copy of the facility's RMP.

If you are importing data from another source (for example, a commercial software package), the data must be in an ASCII file formatted in accordance with the *Risk Management Plan ASCII File Format*. See EPA's website at: http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/RMPS.htm.

To import data:

1. Click the **Import** button from the Main Menu screen. The Select Import File Dialog Box appears.
2. Select the drive, folder, and specific file name of the RMP to import into RMP*Submit. Click in the **Open** button.
3. If errors are detected in importing your text file, you will receive an error message.
4. Click **OK** to display the error message log for your RMP. The RMP Import Error Log Screen will display. Select **File**, **Print** function to view or print the RMP Import Error Log.

F. Using RMP*Submit

Some points before you begin entering data:

RMP*Submit automatically saves the information you enter.

RMP*Submit provides "Help." Use the Help button or, to get context-specific help, place cursor in field and press **<F1>**.

Drop down lists are provided to ensure that users select appropriate choices for RMP data elements where applicable.

Date fields can be entered in several different formats, including:

8/16/03	8/16/2002	August 16, 2003
August-16-2003	aug-16-2003	aug-16-98
Aug 16 03	16 aug 2003	aug-16 (inserts current year)

No matter how you enter the date, it will be displayed as 08/16/2003.

Check boxes are yes/no fields. The default is "no." A check indicates a response of "yes." Clicking inside the boxes or pressing the space bar toggles the check mark (X) on and off.

Similar to Windows, RMP*Submit has a function to reverse the last change. The **Edit/Undo** function will restore one data field. Pressing **<Esc>** twice will restore an entire page.

The status bar, located in the lower left-hand corner of the RMP*Submit window, displays helpful formatting information and brief instructions about selected fields, command buttons, or menu items.

It is important that you create backup copies of your RMP*Submit data, to avoid having to re-enter the information after a system malfunction.

To help ensure that your RMP is complete and accurate, RMP*Submit checks many (but not all) data fields as you enter data.

Navigating RMP*Submit

Most users will navigate within RMP*Submit using a mouse. Information about navigating with the keyboard is found in Appendix K of this manual. You can access functions from the menu bar or the command buttons on each screen.

Creating Backup Copies of Your Data

It is important that you create backup copies of your RMP*Submit data, to avoid having to re-enter the information after a system malfunction. There are several circumstances that can result in the loss of your data:

A hard drive failure may require you to re-format or to replace your drive.

If your computer is turned off while the system is updating the RMP database, the database can become corrupt and unusable.

If, for any reason, you re-install the RMP*Submit application, the RMP database will be overwritten with a new, empty database file.

To backup your RMP data, simply copy the file SRMPDATA2002.MDB to an alternate location. SRMPDATA2002.MDB can be found in the directory or folder to which you installed the RMP*Submit application, usually C:\Program Files\RMP Submit V3. It is recommended that you copy this file to a diskette (the A drive), CD, or to some other removable media (such as a zip drive). You may also choose to copy the file to a network file server drive. <u>The important point is that the file be copied to a drive that is different from the one you are using to run RMP*Submit.</u> You should exit the RMP*Submit application before making the backup copy. The frequency of backup depends on how much time you spend entering data. Making a backup after each hour of data entry means that you will have, at most, one hour of data re-entry after

restoring from the backup copy.

Restoring Your Data from a Backup Copy

To restore your data, copy the file SRMPDATA2002.MDB from the backup location into the directory of folder to which you installed the RMP*Submit application, usually C:\Program Files\RMP Submit V3 overwriting if necessary the SRMPDATA2002.MDB file that may already be there. In case of re-installation of RMP*Submit, perform the re-installation before copying the SRMPDATA2002.MDB backup copy.

Checking Your Entry for Completeness

To help ensure that your RMP is complete and accurate, RMP*Submit checks many (but not all) data fields as you enter data.

If you skip an essential field, RMP*Submit prompts you to enter data before proceeding.

If you enter a value outside the acceptable range of values, RMP*Submit prompts you to enter an acceptable value before proceeding.

If you attempt to leave a record that contains blanks in required fields, RMP*Submit asks if you want to identify the required fields in the form that have not been filled in.

RMP*Submit has an extensive validation function that checks an entire RMP and allows you to create a report of all errors.

To have RMP*Submit check your RMP data for errors:

1. Select an RMP and click the **Check** button from the List of Risk Management Plans Screen. If RMP*Submit finds any errors it will prompt you to view the error report.

2. The validation function will also be executed automatically each time you **Create Submission File,** as described in the next section of this manual.

Printing Your RMP Data

RMP*Submit provides the capability to print an entire RMP or selected parts of an RMP from within any section of the current RMP.

1. Click **Print** from the List of Risk Management Plans Screen or select **<File**, **Print>** from the Menu bar. The RMP Report Options Dialog Box will appear.

2. Click **Entire RMP** or select a section or subsection of the RMP to print.

3. Click the **Preview** button to view your RMP before printing. When you preview an RMP, each section is displayed as a separate report. You may print or close each report as appropriate.

4. Click the **Print** button to send the RMP directly to the printer without previewing it.

5. Click the **Cancel** button to return to the previous Data Entry screen.

Create Submission File

Once you have completed entering your RMP data, you can create a disk for submitting your RMP to EPA.

1. Select an RMP from the List of Risk Management Plans Screen and click the **Create Submission File** button.

2. A message box will display, asking if this is your first submission, a correction or a re-submission. If you answer "Correction" or "Resubmission," RMP*Submit will check to make sure that you have entered your RMP Facility Identifier. See Chapters 6 and 7 for more information about submitting.

3. Next, RMP*Submit prompts you as to whether you wish to output this RMP to a floppy diskette. If so, insert a formatted diskette into the appropriate drive.

4. Enter the drive where you want to save your RMP (Drive **A:** is the default), and click **OK**. For example, if your 3.5-inch disk drive is drive **B:**, you would enter “b”. Next, another message box will display that says, “RMP will be output to file a:\rmp.txt. Is diskette in Drive?” (**A:** represents the output drive you have chosen). Make sure that your disk is in the correct drive and click **OK**. Your RMP is output (saved) to your submission disk with the filename **rmp.txt**. The **Create Submission File** function will automatically validate the selected RMP. If there are no critical errors, the RMP will be exported to a text file. You will also be asked if you would like to preview the error report described in Section 4.3.2. If critical errors are found during validation, this operation will be terminated. View the error report to see where errors exist in your RMP.

G. Welcome and Main Menu Screens

Welcome to RMP*Submit Screen

When you start RMP*Submit, the Welcome to RMP*Submit screen appears. The Welcome Screen (Exhibit 1) summarizes the steps for entering and submitting RMP data. Click the **Print** button to print this screen. Click the **Close** button to close the Welcome screen and go to the Main Menu. To disable the Welcome screen so that it does not display again, click the **"Don't display this message again"** box at the bottom of the Welcome screen. To re-enable the display of this dialog box, select **Edit –> Options – > User Settings** from the menu bar of the Main Menu.

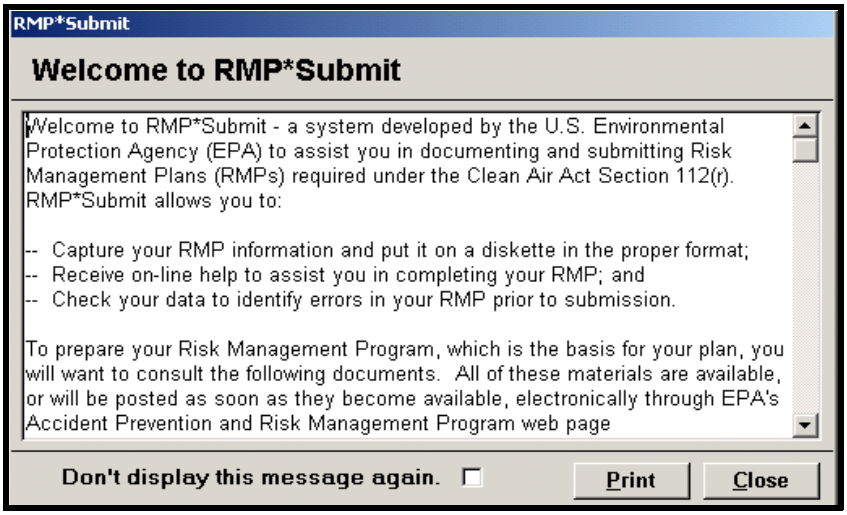

Exhibit 1. Welcome to RMP*Submit screen

Tip When the Welcome to RMP*Submit screen first appears, clicking the vertical scroll bar may cause all the text to be highlighted (selected). If so, simply click inside the text box or press **<F2>** to clear (unselect).

Main Menu

When you close the Welcome screen, the Main Menu form (Exhibit 2) provides access to four major functions: Data Entry; Edit Certification Letters; Import; and Create De-registration Letter.

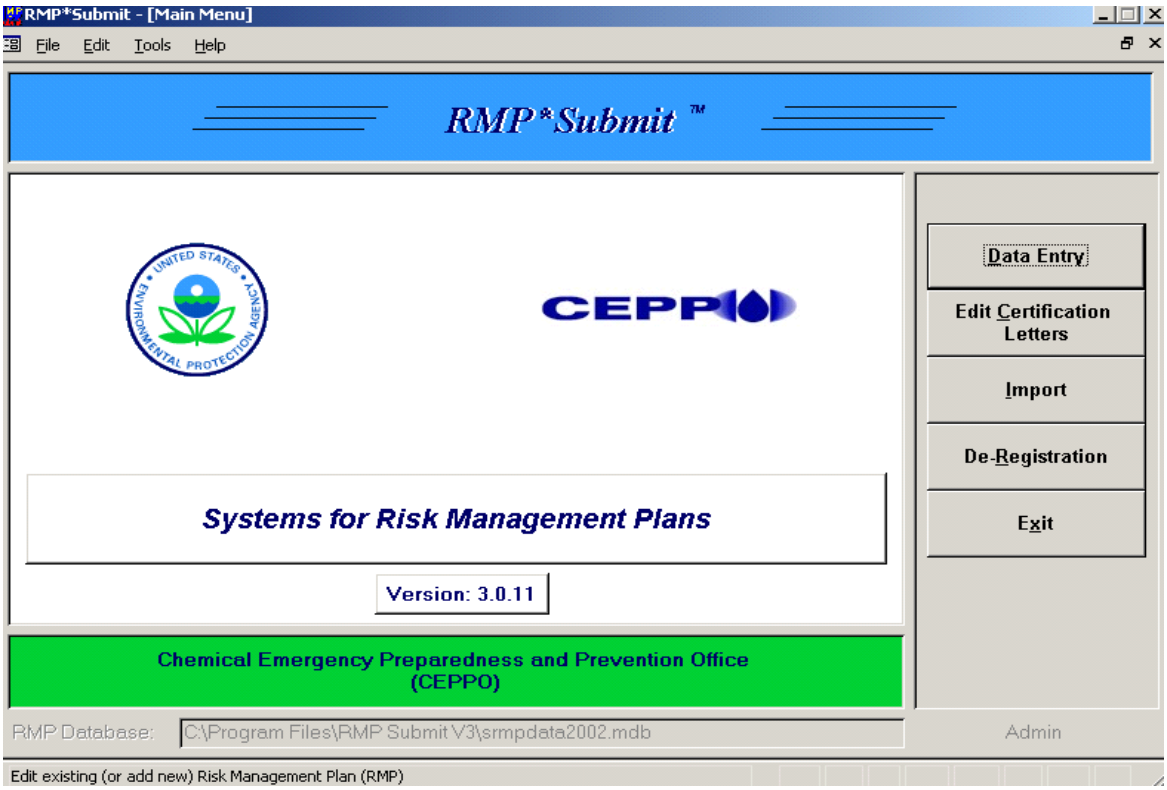

Exhibit 2. Main Menu screen

Description of the Major Functions:

Data Entry

The **Data Entry** function allows you to add new or edit existing RMPs (first-time submissions, corrections, and re-submissions); delete RMPs; check your RMP for completeness; print; and create the submission file.

The commands "New" and "Edit" allow you to enter the data elements for the Registration, Worst Case, and Alternative Release Scenarios, Five-Year Accident History, Program Level 2 and Program Level 3 Prevention Programs, and Emergency Response Plan, and Executive Summary sections of the RMP.

When you select **Data Entry**, if you have not previously created an RMP or if there are no existing RMPs, you will go directly to the Section 1 Registration Information Screen. If you have existing RMPs, the List of Risk Management Plans Screen will be displayed (Exhibit 3). The List of Risk Management Plans Screen displays a list of previously entered RMPs, by facility name.

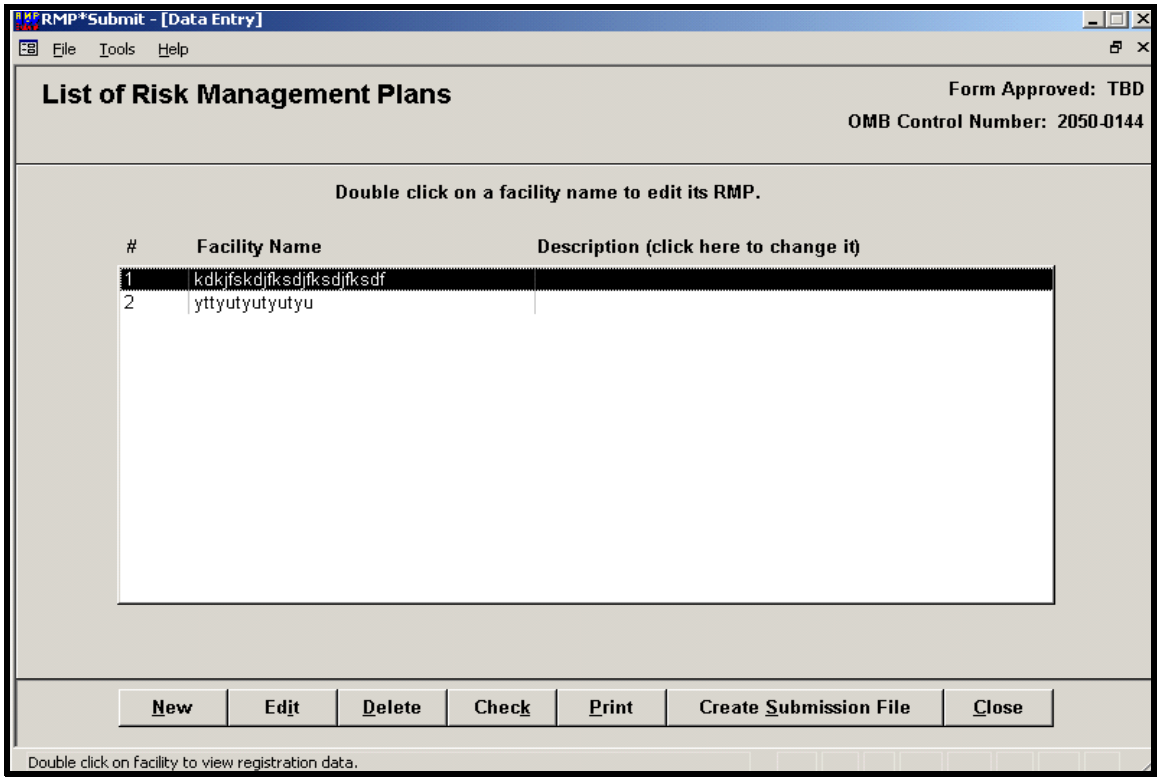

Exhibit 3. List of Risk Management Plans screen

To edit an existing RMP:

Double-click on the facility name to go directly to the "Section 1. Registration Information" screen.

To execute any of the RMP functions (Edit, Delete, Check, Print, Create Submission File) for an existing RMP:

Single-click on the facility name. This will highlight the name. Then, click on the appropriate button to execute the following RMP functions:

- **New** RMP – Add a new RMP facility plan
- **Edit** the selected RMP – This will open "Section 1. Registration Information" screen
- **Delete** selected RMP – All records for the selected RMP will be deleted.

- **Check** – The RMP will be checked for completeness.
- **Print** – This function will print the RMP.
- **Create Submission File** – This function will create the file for submission.
- **Close** – Data Entry screen will be closed

Edit Certification Letter

Part 68 specifies that a signed certification statement must be sent with each RMP:

> ***68.185 Certification.***
>
> *(a) For Program 1 processes, the owner or operator shall submit in the RMP the certification statement provided in § 68.12(b)(4) of this part.*
>
> *(b) For all other covered processes, the owner or operator shall submit in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete.*

This function will allow you to edit the template for the certification letter to accompany your submission (for Program 1, for Program 2 or 3, and for a corrected RMP). You can cut and paste this text into your own word processing package to finalize and print the letter. Sample certification letters are provided in Appendix C.

The certification statement must be signed by the owner or operator or a senior official with management responsibility for the person (or persons) completing the RMP. The owner, operator, or official must certify the accuracy and completeness of the RMP by signing and dating the certification statement. The statement applies to all the information supplied in the RMP and should be signed only after the form is complete. The name and title of the person signing the statement should be printed or typed on the certification. The certification statement submitted must bear the original signature of the person making the certification.

Import

You may have RMP data from a previous version of RMP*Submit or another source that you want to import into RMP*Submit 2004. When RMP*Submit 2004 imports older versions, it will check the NAICS code, the county name, the DUNS number, and the lat/long and display any errors found.

Additional information about the Import function is presented earlier in this chapter.

Create De-registration Letter

Changes may occur at your facility that make it no longer subject to part 68 (e.g., you replace the regulated substances in your processes with unregulated substances). In that event, you must submit a letter to the RMP Reporting Center within six months and include the effective date of the de-registration (the date on which your facility was no longer covered by part 68) and the reason for the de-registration. The letter must be signed by the owner or operator and include your EPA FACILITY ID as assigned by the RMP Reporting Center (also known as RMP ID) number.

The **Create De-registration Letter** function will generate a letter for you. See Chapter 8 for more details.

CHAPTER 2 ENTERING DATA

When you create a new RMP for a facility, you must start with Section 1 Registration Information. The other sections of the RMP are only accessible while the Registration Information Screen for the facility is open.

You cannot enter data for Sections 2 through 5, 7, and 8 until you have entered facility name and process-specific information.

Section 1: Registration

All covered facilities must complete the registration portion of the RMP even if you have only Program 1 processes. The registration consists of facility identification information.

1.1.a. Facility Name. Provide the name of your facility. The name must be specific to the site; if the site is part of a large corporation, the name may be the corporate name plus the location (for example ABC Chemicals - Hightown Plant). Throughout the Risk Management Program, the term "facility" means "any buildings, structures, equipment, installations or substance emitting stationary activities (i) which belong to the same industrial group, (ii) which are located on one or more contiguous properties, (iii) which are under the control of the same person (or persons under common control), and (iv) from which an accidental release may occur."

1.1.b. Parent Company #1 Name. Your parent company is the corporation or other business entity that owns at least 50 percent of the voting stock of your company. If you are owned by a joint venture, enter the first of your two major owners here. If your company does not have a parent company, leave this data element blank.

1.1.c. Parent Company #2 Name. If you are owned by a joint venture, enter the name of the second major owner here.

1.2 EPA Facility Identifier. The EPA Facility ID # must be left blank for first-time submissions. Otherwise, use the number that was assigned to your facility by the RMP Reporting Center after your first submission. The RMP Reporting Center included this number in their acknowledgment letter. The EPA Facility ID # is a unique, 12-digit number. (If you don't have your EPA Facility ID#, call the RMP Reporting Center at 301-429-5018.)

1.3. Other EPA Systems Facility Identifier. Enter one of the following Facility Identification numbers, in order of preference:

TRI (Toxic Release Inventory) Facility ID number (15 characters)

Or

Resource Conservation and Recovery Act (RCRA) ***RCRIS Handler ID*** (12 characters)

(This Handler ID is the same as the RCRA Biennial Reporting System (BRS) ID. Soon, BRS and RCRIS will be combined into the same system called RCRAInfo which will also use this ID.)

Or

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) ***CERCLIS Site ID*** (7 characters)

If you know you have a facility ID for reporting to one of the EPA programs above, but do not know what it is, you can find it by doing a search of EnviroFacts' Facility database on the Internet at: **http://www.epa.gov/enviro/html/fii/fii_query_java.html** or calling the EPCRA Hotline at 800-424-9346.

If your facility does not have an ID Number as described above, leave this data element blank.

1.4.a. Facility Dun and Bradstreet Number (DUNS). A Dun and Bradstreet Number (DUNS) is a nine-digit identification number that allows your facility to be cross-referenced to various business information. If you have a DUNS number, it should be available from your treasurer or financial officer. You can also ascertain the number through Dun and Bradstreet (check their website at www.dnb.com). If you don't have a DUNS number, leave this data element blank.

1.4.b-c. Parent Company Dun & Bradstreet Number(s) (DUNS). Enter the DUNS number of your parent company(ies), if applicable. If you are owned by a joint venture, enter the numbers for your two major owners. If you do not have a parent company or your parent company does not have a DUNS number, leave this item blank.

1.5.a-e. Facility Location Address. Enter your facility *location* address, including the street, city, state, and zip code (including the 4 digit extension, if applicable) of your facility. This is the location where regulated substances are present. The city should be the local legal jurisdiction, for example, a township or village. Use local street and road designations, not post office or rural box numbers. **This location may not represent the mailing address. EPA will not attempt to mail correspondence to this address. All correspondence will be mailed to the address provided at 1.6.c-h.** If your location and mailing address are the same, then you will fill in the same address at 1.6.c-h.

1.5.f. Facility County. Enter the county in which the facility is located.

1.5.g-h. Facility Latitude and Longitude.

Enter the latitudinal and longitudinal coordinates of your facility in ***decimal degrees***. You can enter decimal latitude or longitude values to six decimal points precision. For example, a facility with latitude / longitude of:

39/ 1' 42", -76/ 42' 43" (degrees/minutes/seconds format)

would be entered as

39.028333, -076.711944 (decimal degrees format)

The **DMS Calculator** button provides a function to convert from degrees/minutes/seconds to decimal degrees.

Enter only numerical data. Do not preface numbers with letters such as N or W to denote the hemisphere. For most facilities using RMP*Submit, the hemispheres will be North or West, which would correspond to a positive latitude and a negative longitude. You would therefore enter no sign for latitude and a "-" sign as the first character for longitude.

It is important to provide accurate latitude and longitude values in your RMP. RMP*Submit will help you enter accurate coordinates by letting you know if the value that you enter falls outside of the range of values for the county in which your facility is located.

Tip Be careful not to reverse your latitude and longitude coordinates. Latitude in the 48 contiguous states ranges from 25/ to 49/ while longitude ranges from -72/ to -124/.

TRI Facility Siting Tool

EPA has developed the TRI Facility Siting Tool to allow facilities that submit Toxic Release Inventory (TRI) reports to obtain their latitude and longitude. This tool may also be used by facilities submitting Risk Management Plans (RMP). The tool asks you to enter either a zip code or a city and state. It then provides a map that you can zoom into and pan sideways, to identify your location. Once you get to the maximum zoom-in level, it will show a satellite photo over the map, to further assist in pinpointing your exact location. The tool will then display the latitude and longitude in "degrees/minutes/seconds" format. You should use the **DMS Calulator** button in RMP*Submit to convert to decimal degrees.

The TRI Facility Siting Tool can be accessed at the following web address:
http://www.epa.gov/tri/report/siting_tool/index.htm

If you use the TRI Facility Siting Tool to obtain your latitude and longitude, you should put the following values in the additional latitude/longitude fields:

i. Lat/Long Method: I2 - Interpolation-Photo
m. Source Map Scale Number: 24000
k. Horizontal accuracy measure (m): 25
l. Horizontal Reference Datum Code: 002 - North American Datum of 1983

For additional information about latitude and longitude, see Appendix F of this manual.

1.5.i. Method for determining Latitude and Longitude. You also must indicate the method that you used to determine your latitude and longitude data.

1.5.j. Description of location identified by Latitude and Longitude. You must also describe the exact location your latitude and longitude values represent. See Appendix F for the complete lists of codes to be used for this element. The most common Latitude and Longitude location descriptions are PG (Plant Entrance - General) and CE (Center of Facility).

1.5.k. Horizontal Accuracy Measure. You must also provide the measure of the accuracy (in meters) of the latitude and longitude coordinates.

1.5.l. Horizontal Reference Datum Code. You must provide the code that represents the reference datum used in determining latitude and longitude coordinates you entered in 1.5.g and 1.5.h, respectively. The range of permissible values is given in Appendix F.

1.5.m. Source Map Scale Number. The number that represents the proportional distance on the ground for one unit of measure on a map or photo. This field must be supplied if you have chosen a lat/Long Method of type "Interpolation - Map" (I1) or "Interpolation - Photo" (I2).

1.6.a. Owner or Operator Name. Enter the name of the legal owner or operator of the facility (person, company, association, or government agency).

1.6.b. Owner or Operator Phone. Enter the owner or operator's business phone number, including area code.

1.6.c-h. Owner or Operator Mailing Address. EPA will mail all correspondence to this address. It need not be the facility address. Enter the owner or operator's business mailing address, including street or P.O. or rural box, city, state, and zip code (including 4 digit extension, if applicable). The city should be the local legal jurisdiction, for example, a township or village. In this instance, you should use post office and rural box numbers, if appropriate.

If your owner/operator mailing address is the same as your facility address, click the **Copy Facility** button to automatically fill in this information.

If your owner/operator address is a foreign address, click the **Switch to Foreign Address** button and proceed.

1.7.a. Name of person responsible for RMP (part 68) implementation.
1.7.b. Title of person or position responsible for RMP (part 68) implementation.
Enter the name and title of the person or position with overall responsibility for the risk management program at your site. Although the individual's name is not required, the title of the person or the position that has this responsibility is required.

1.8. Emergency Contact.

1.8.a-b. Name and Title. Enter the name plus the title or job classification of the person designated as the emergency contact. If you have more than one contact person, you may want to list the others in your Executive Summary.

> Your emergency contact should be:
> An employee of or a contractor to your facility;
> Knowledgeable about your site;
> Aware of all emergency plans; and
> Able to provide emergency response support or direct response personnel to provide support.

1.8.c. Phone Number. Enter the phone number, including area code, where the emergency contact can be reached during normal business hours. You most likely will enter the facility phone number here. If your facility does not have a phone number, you may enter the business phone number of the emergency contact, the phone number of a dispatcher, or the customer service phone number.

1.8.d-e. 24-Hour Phone Number & Extension or Pin Number. Enter the phone number, including area code, where the emergency contact can be reached during non-working hours. You may enter the emergency contact's 24-hour "beeper" number. There is a space for an extension or pin number, if applicable.

1.8.f. Emergency Contact E-mail address. This is a new element in 2004. Provide an e-mail address (if one exists) for the emergency contact. Enter N/A if no email address exists.

1.9.a. Facility or Parent Company E-Mail Address (Optional). You may choose to provide an e-mail address to which inquiries from the public could be sent. The e-mail address could be for the person who developed your RMP or your public liaison office.

1.9.b. Facility Public Contact Phone Number (Optional). You may choose to provide a phone number for public inquiries. It could be the phone number of the person who developed your RMP or of your public liaison office.

1.9.c. Facility or Parent Company WWW Homepage Address (Optional). You may choose to provide an Internet address where the public can obtain more details on your accident prevention program, offsite consequence analysis, or other facility or corporate information.

1.10. LEPC (Optional). Enter the name of your Local Emergency Planning Committee (LEPC) for your planning district. LEPCs were created to do local planning under the Emergency Planning and Community Right to Know Act (EPCRA) of 1986. In RMP*Submit, you will select your LEPC's name from a pick list based on the facility county and zip code information that you have provided. If you do not know your LEPC's name, you can call your local fire department or refer to the LEPC Database on the Internet at: **http://www.epa.gov/swercepp/lepclist.htm**. This data element will help your LEPC find the facilities in its jurisdiction.

1.11. Number of full-time equivalent employees on site. Enter the number of full-time equivalent employees who work at your facility. To determine the number of full-time equivalent employees at your facility, add together the fractions of full-time work performed by part-time or seasonal employees and round to the nearest whole number (see example below). Do not include contract employees. If your facility is un-manned or is staffed only by part-time employees, you should briefly explain these circumstances in the executive summary.

For example, suppose a facility has 10 regular full-time employees, two part-time employees that each work 30 hours per week, and seven seasonal employees that each work 40 hours per week for three months of the year. You should count the two part-time employees as 3/4 of an employee each because they work 3/4 that of a full-time employee and the seven seasonal employees as a 1/4 of a full-time employee each, for the same reason. As shown in the table below you get 13.25, which you should round to the nearest whole number. You should enter "13" for the number of full-time employees.

Type of Employee	Number of Employees Times the Fraction of a Full-Time Employee	Full-Time Equivalent Employees
Full-time (40 Hours)	10 x 1	10
Part-Time (30 hours)	2 x 0.75	1.5
Seasonal (3 months/year)	7 x 0.25	1.75
Total		**13.25 (rounded to 13)**

Exhibit 5. Example Calculation of Full-Time Equivalent Employees

1.12.a. Covered by OSHA's Process Safety Management (PSM) of Highly Hazardous Chemicals Standard (29 CFR 1910.110). This data element applies to your facility as a whole and is not a process-by-process determination. Therefore, if any process at your facility is subject to the OSHA PSM standard, select this data element, even if the PSM process is not covered by the RMP rule. For further information, about OSHA's PSM standard, see www.osha-slc.gov/SLTC/processsafetymanagement.gov.

1.12.b. Covered by EPCRA section 302. Check this box if you have on site more than a threshold planning quantity of a substance that is an extremely hazardous substance (EHS) defined in 40 CFR 355. If you are subject to those requirements, check this element, regardless of whether the EHS is an RMP regulated substance or is held in a process below the 112(r) threshold quantity. Two quick hints:

(1) If you are subject to the RMP rule because you have more than a threshold quantity of a **toxic** substance listed under Section 112(r), you are subject to EPCRA section 302 and must select this data element.
(2) If you are subject to the RMP rule only as a result of flammable substances, you are not subject to EPCRA section 302, and you can leave this data element blank.

1.12.c. CAA Title V Air Operating Permit ID. Title V of the Clean Air Act requires major sources of air pollution to obtain permits. If your facility has been issued a Title V operating permit by a federal, state, or local permitting agency, check this element and enter your permit number.

1.13. OSHA Star or Merit Ranking (Optional). Check the box if your facility has received a Star or Merit Ranking under OSHA's Voluntary Protection Program.

1.14. Last Safety Inspection (by an External Agency) Date.
Record the date of your last safety inspection by an external agency.

1.15. Last Safety Inspection Performed by an External Agency (select one).
Select the agency (or agencies) that performed the inspection. If you select "Other," please specify the agency. If your last safety inspection was a joint inspection, enter multiple agencies by typing them into the field.

1.16. Will this RMP involve Predictive Filing?
Predictive Filing is an RMP filing option that allows your facility to submit an RMP which includes regulated substances which may not actually be present at the facility at the time the RMP is submitted. This option is intended to assist facilities such as chemical warehouses, chemical distributors, batch processors and the like whose operations involve highly variable types and quantities of regulated substances but who are able to forecast their inventory with some degree of accuracy. Under 40 CFR §68.190, a facility is required to update and re-submit its RMP no later than the date on which a new regulated substance is first present in a covered process above a threshold quantity. By using Predictive Filing, you will not be required to update and re-submit your RMP when you receive a new regulated substance if that substance was included in your latest RMP submission (as long as you receive it in a quantity that does not trigger a revised offsite consequence analysis as provided in 40 CFR §68.36).

If you use Predictive Filing, you should implement your Risk Management Program and prepare your RMP in exactly the same way as if all of the substances included in the RMP were actually present. This means that you must meet all rule requirements for each regulated substance for which you file, whether or not that substance is actually present on site at the time you submit your RMP. Depending on the substances for which you file, this may require you to perform additional worst-case and alternative-case scenarios and to implement additional prevention program elements. Note that if your facility uses this option you must still update and resubmit your RMP if you receive a new regulated substance which was not included in your latest RMP. Your facility must also continue to comply with the other update requirements stated in 40 CFR

§68.190.

If your facility uses Predictive Filing, the RMP database for your facility will indicate that your facility has filed a predictive RMP. This will inform users of the database that some of the chemicals in your RMP may not actually be present on site, but will not indicate which specific chemicals are on site at any given time. Therefore, you may receive more frequent questions from the public, local officials, or implementing agencies about your actual chemical inventory. EPA encourages you to engage in more frequent dialogue with these parties, and in particular with local emergency planners, emergency responders, and community officials to update them on your current inventory of regulated substances.

1.17. Process-Specific Information

Click the **<Processes>** button located at the bottom of the last page of the Registration Data Entry form. The number in parentheses indicates the number of processes that you have already entered.

In this section of the registration, answer five questions for **EACH** covered process at your facility. A few examples follow the descriptions of the data elements below.

The system generates a **Process ID #** automatically to track multiple processes as you fill out the remaining sections of your RMP.

Process Description. This description is optional. It is provided to help you (if you need to) track multiple processes as you fill out the remaining sections of your RMP. This description will not be submitted to EPA with the RMP data.

1.17.a. Program Level. Each covered process must be assigned to a program level that reflects the process' potential for public impacts and the level of effort needed to prevent accidents. The rule requirements the process must meet depend on the program level to which it is assigned. Following is a brief description of the applicability criteria for each program level, but you should consult the rule and Chapter 2 of the *General Guidance for Risk Management Programs* in determining the program level applicable to your covered processes:

Program 1	Program 2	Program 3 (unless eligible for Program 1)

Process has experienced no accident in past 5 years that resulted in significant off-site impacts, No public receptors in worst-case circle, and Emergency response coordinated with local responders.	Process is not eligible for Program 1 or subject to Program 3.	Process is subject to OSHA PSM, or Process is in NAICS code 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532.

Exhibit 6. Program Eligibility Criteria

A process can qualify for Program 1 even if the process is already subject to OSHA PSM. For Program 1 processes, the implementing agency will inspect and enforce only with respect to the minimal Program 1 requirements. If you assign a process to Program 2 or 3, the implementing agency will inspect and enforce with respect to all the requirements of the higher program levels, even though it may qualify for Program 1. However, if you are already in compliance with the prevention elements of Program 2 or Program 3, you may want to use the RMP to inform the community of your prevention efforts.

KEY POINTS TO REMEMBER

In determining program levels for your process(es), keep in mind the following:

(1) **The program levels apply to individual processes** and generally indicate the risk management measures necessary to comply with this regulation for the process, not the facility as a whole. The eligibility of one process for a program level does not influence the eligibility of other covered processes for other program levels.

(2) **Any process can be eligible for Program 1**, even if it is subject to OSHA PSM or is in one of the NAICS codes subject to Program 3.

(3) **Program 2 is the default program level**. There are no "standard criteria" for Program 2. Any process that does not meet the eligibility criteria for either Programs 1 or 3 is subject to the requirements for Program 2.

Refer to Chapter 2 of the *General Guidance for Risk Management Programs* for more information on determining the Program levels of your processes. Once you determine the Program level, simply enter 1, 2, or 3 for this data element.

Tip Note that you will not be allowed to enter NAICS codes or chemicals until you enter the program level for the process. Also note that the program level that you enter relates to other sections of the RMP. Once you have entered the program level, the only way you can change it is by deleting the entire Process record and entering a new Process record.

1.17.b. NAICS Code(s). The North American Industry Classification System (NAICS) categorizes businesses by fitting them into descriptive categories that correspond to five-digit or six-digit codes. NAICS codes have replaced SIC codes, with which you may be familiar. For example, pulp mills are NAICS code 32211, paper mills are 322121 or 322122, and metal platers are 332813. The first three digits of a five or six-digit code define a major business sector and the last two or three digits indicate an establishment's specialty within the major sector.

For this data element you should provide the NAICS code that most closely corresponds to the process; it will not necessarily be the same NAICS code for your facility as a whole. For example, if you manufacture chlorine, then process it to make cleaners, the chlorine manufacturing is in NAICS code 325818 and the cleaner manufacturing is in NAICS code 325612. If your chlorine manufacturing vessel is connected by pipes to, or co-located with, the cleaner manufacturing vessel, they are considered one "process" by the RMP rule. In such a case, you should enter the NAICS code that describes the primary activity of the "process." In the example above, if the chlorine and cleaner vessels are interconnected, the primary activity of the "process" is manufacturing cleaner, since that is the ultimate product of the "process." You may also enter additional NAICS codes if you wish to identify other aspects of a process not captured by the NAICS codes for the primary activity. In the example above, you could also enter NAICS code 325181 for chlorine manufacturing, if you so desire. If you do enter multiple NAICS codes, be sure to enter your primary NAICS code first.

You should determine the NAICS codes for your processes based on your activities on site using the *2002 North American Industry Classification System Manual.* Appendix B of the *General Guidance for Risk Management Programs* provides the NAICS codes for the industry sectors most likely to be subject to 40 CFR Part 68. RMP*Submit also contains the full list. You may also access the full list online at ***www.census.gov/epcd/www/naics.html*** and a cross-walk between SIC codes and NAICS codes at ***http://www.census.gov/epcd/www/naicstab.htm***.
In addition to these resources, note the availability of the NAICS Code Selector under the NAICS Help button, available on the NAICS Codes screen.

Below is the conversion from SIC codes to NAICS codes for the Program 3 NAICS codes. Note there are 2 duplicates listed in the NAICS column because of the conversion. The 9 SIC codes translate into a total of 10 NAICS codes.

SIC	NAICS	Sector
2812	325181	Alkalies and chlorine
2821	325211	Plastics and resins

2873	325311	Nitrogen fertilizer
2879	32532	Pesticide and other agricultural chemicals
2911	32411	Petroleum refineries
2611	32211	Pulp mills only
2819	325188	All other basic inorganic chemical manufacturing
2865	32511	Aromatics have been combined with aliphatics from 2869 to form the new petrochemical manufacturing
	325192	Other covers the cyclic crude and intermediate manufacturing
2869	32511	Aliphatics, joined with aromatics in petrochemical manufacturing;
	325188	Carbon bisulfide, moved to "All other basic inorganic chemical manufacturing" (covered from old 2819);
	325199	Other, moved to "All other basic organic chemical manufacturing."

1.17.c.1. Chemical Name. For each covered process, select the names of all regulated substances held above the threshold. Many regulated substances have synonyms; however, you must enter the name of the regulated substance as it appears in 40 CFR § 68.130. If you have a NFPA-4 flammable mixture containing regulated flammables, you may list it as a "flammable mixture." List all of the regulated substances contained in the mixture; however, only report the quantity of the entire mixture, not the individual substances. RMP*Submit will automatically enter the corresponding CAS number.

1.17.c.3. Quantity. For each chemical reported in 1.17.c.1, estimate the maximum quantity (in pounds) held in the covered process at any one time during the calendar year to two significant digits. For example:

5,333 pounds	should be reported as...	5,300 pounds
107,899 pounds	should be reported as...	110,000 pounds
128,000 pounds	should be reported as...	130,000 pounds

Can I use Maximum Quantity On-Site Data from my EPCRA Tier II Reports?

Not directly. EPCRA Tier II reports require maximum quantity on-site in specified ranges. The RMP registration asks for the maximum quantity in a process. Therefore, if your facility has several covered processes containing the same regulated substance above the threshold, estimate on a process-by-process basis the maximum quantity of the regulated substance in each process.

You may be able to use raw Tier II data to estimate the quantity of a regulated substance in a process. It is likely that in preparing your Tier II reports you estimated the quantity of a regulated substance in each process or building and then added the quantities together to estimate the total maximum on-site. Therefore, you can take the estimates you used to calculate your Tier II ranges for your RMP registration.

How do I Report Maximum Quantity in a Process for Mixtures or Trade Name Products?

Toxics. If the regulated toxic substance present in a process is part of a mixture or trade name product, determine the maximum quantity of the mixture or trade name product and then calculate the weight percent of the regulated toxic substance to report for quantity. **Do not include the weight of the entire mixture or trade name product.**

Flammables. For regulated flammable substances that are part of a mixture, and the mixture meets the criteria of NFPA-4, report the weight of the mixture.

EXAMPLE 1

Suppose you have 21,365 pounds of ammonia in a covered process classified as other basic inorganic chemicals (NAICS code 32518) and do not have ammonia in any other covered processes. Report your ammonia maximum as:

Process Number:	1		
Process Description:	Basic Inorganic Chemicals		
1.17.a. Program Level:	2		
1.17.b. NAICS Code(s):	32518		
1.17.c. Chemical	**1.17.c.1. Name:**	**1.17.c.2. CAS #:**	**1.17.c.3. Quantity (lbs.):**
	Ammonia	7664-41-7	21,000

Now suppose that in addition to the 21,365 pounds, you also have 25,600 pounds of ammonia in another covered process classified as nitrogenous fertilizers (NAICS code 325311). In this case, report a second process as:

Process Number:	2		
Process Description:	Nitrogenous fertilizer		
1.17.a. Program Level:	2		
1.17.b. NAICS Code(s):	325311		
1.17.c. Chemical	**1.17.c.1. Name:**	**1.17.c.2. CAS #:**	**1.17.c.3. Quantity (lbs.):**
	Ammonia	7664-41-7	26,000

EXAMPLE 2

You received one shipment of a nitric acid solution last year that filled your 5,000-gallon storage tank. You know that the solution contains 95% nitric acid, which is a regulated chemical with a threshold quantity of 5,000 pounds.

First, convert gallons to pounds:
The density of 95% nitric acid is about 12 pounds per gallon, so you calculate the total weight of solution by multiplying 5,000 gallons by 12 to get 60,000 pounds.

Then, calculate the portion of the solution attributable to the regulated toxic substance:
To calculate the weight of nitric acid, you multiply 60,000 pounds by 0.95 to get 57,000 pounds.

Report the nitric acid in this process as follows:

Process Number:	3		
Process Description:	Storage - nitric acid		
1.17.a. Program Level:	2		
1.17.b. NAICS Code(s):	325311		
1.17.c. Chemical	**1.17.c.1. Name:**	**1.17.c.2. CAS #:**	**1.17.c.3. Quantity (lbs.):**
	Nitric Acid	7697-37-2	57,000

1.18.a. RMP Preparer Name. If an outside contractor or consultant prepared the RMP for the facility, enter the name of the contractor or consultant.

1.18.b. RMP Preparer Telephone. Enter the telephone number of the contractor or consultant who prepared the RMP for the facility.

1.18.c-g. RMP Preparer Address. Enter the street address, city, state, and zip code of the contractor or consultant who prepared the Risk Management Plan for the facility.

Overview of Sections 2-5: Offsite Consequence Analysis

You must submit data on:

1. **Worst-case release scenario** analysis of covered processes as follows:

   Report one worst-case release scenario for each Program 1 process. Program 1 processes must have no public receptors within the distance to the endpoint in the worst-case analysis.

   If your facility has Program 2 or Program 3 processes, report one worst-case release scenario to represent *all* Program 2 and Program 3 processes having toxic regulated substances present above the threshold quantity, *and* one worst-case release scenario to represent *all* Program 2 and Program 3 processes having flammable regulated substances present above the threshold quantity. If you have more than one Program 2 or 3 process, you will report the worst-case release scenario for the Program 2 or 3 process that would have the greatest potential impact on the public (i.e., the greatest distance to endpoint). You may also need to submit an additional worst-case scenario for either hazard class (i.e., toxic or flammable), if a worst-case release from elsewhere at your facility would potentially affect a different set of public receptors than those affected by your initial worst-case scenario(s).

2. **Alternative release scenario** analysis of Program 2 and Program 3 processes as follows:

   Present one alternative release scenario for ***each*** regulated toxic substance held above the threshold quantity in a Program 2 or 3 process, including the substance considered in the worst-case analysis.

   Present one alternative release scenario to represent ***all*** flammable substances held above the threshold quantity in a Program 2 or 3 process.

   Note that alternative release scenarios should be those that will reach an endpoint offsite, unless no such scenario exists.

You may include one graphic (map or diagram) in electronic format for each release scenario that you report, but it is not required.

Using a flammable mixture for your OCA: You may have registered a flammable mixture for a process, even if the entire flammable mixture does not ever occur together in one vessel in the process. When reporting the OCA, choose the flammable mixture from the registration section, but do the modeling based on the specific components of the flammable mixture that are contained in the vessel that you are modeling for the OCA.

Refer to Chapter 4 of the *General Guidance for Risk Management Programs* for more details on the requirements of the Offsite Consequence Analysis.

Section 2: Toxics: Worst-Case

Complete this section for each toxic worst-case scenario you report.

2.1.a. Chemical name. Enter the name of the regulated toxic chemical you evaluated in the worst-case scenario.

2.1.b. Percent weight of chemical (if in a mixture). If your worst-case scenario involves the release of a mixture containing a regulated substance, enter the percentage weight of the regulated substance in the mixture. Leave blank if it is not a mixture.

2.2. Physical state. Select the physical state of the chemical in the vessel that you are modeling.

a. Gas.
b. Liquid.
c. Gas liquified by pressure.
d. Gas liquified by refrigeration.

2.3. Model used (select one). Select the source of your results for your worst-case release analysis or enter another model name in "Other":

a. EPA's *OCA Guidance* Reference Tables or Equations
b. EPA's *RMP Guidance for Ammonia Refrigeration* Reference Tables or Equations
d. EPA's *RMP Guidance for Waste Water Treatment Plants* Reference Tables or Equations
e. EPA's *RMP Guidance for Warehouses* Reference Tables or Equations
f. EPA's *RMP Guidance for Chemical Distributors* Reference Tables or Equations
g. EPA's RMP*Comp™
h. Areal Locations of Hazardous Atmospheres (ALOHA®)
z. Other model (specify)

2.4. Scenario. Select one of the following which describes your worst-case release scenario. (Note: This list is set by the regulation.)

a. Gas release. A release of the substance in a vapor state.
b. Liquid spill and vaporization. A release of the substance in a liquid state with subsequent vaporization.

2.5. Quantity released (lbs). Enter the quantity of toxic chemical you used for your worst-case scenario analysis in pounds to 2 significant digits. This is the total amount that would be lost from a vessel or pipeline, even if the release location was inside a building or into other containment. The "release rate" or the rate at which the chemical actually gets into the outside air for the downwind dispersion analysis, is reported in 2.6 below. See Chapter 2 on Determining Worst-Case Scenarios in the *RMP Offsite Consequence Analysis Guidance* for more details. Here's how to report the quantity to 2 significant digits:

5,333 pounds	should be reported as...	5,300 pounds
107,899 pounds	should be reported as...	110,000 pounds

If you have less than 1 pound released, round up to 1 pound. You may want to clarify that in your Executive Summary.

2.6. Release rate (lbs/minute). Enter the rate of release to the outside air in pounds per minute to 1 significant digit. For example:

4.3 pounds per minute should be reported as... 4 pounds per minute
19 pounds per minute should be reported as... 20 pounds per minute

For gases, a gas liquefied by pressurization alone, or a gas liquefied by refrigeration where the released refrigerated liquid forms a pool of 1 cm or less in depth, the release rate should be the total quantity released divided by 10 minutes (this is a regulatory requirement) and multiplied by the appropriate mitigation factor if a mitigated release. See Chapter 4 of the *General Guidance for Risk Management Programs* for more information.

The worst-case release scenario for liquid substances assumes that the liquid is instantaneously spilled on the ground or other surface followed by volatilization into the air. For the release of a liquid or a gas liquefied by refrigeration where the refrigerated liquid forms a pool deeper than 1 cm, the release rate to the air should be the rate of volatilization based on the properties of the substance and size of the liquid pool formed by the released substance, multiplied by the appropriate release mitigation factor if a mitigated release.

2.7. Release duration (minutes). Indicate the length of time in minutes to the nearest 10 minutes for the entire quantity released from the vessel, pipeline, or other source to be released to the outside air.

For gases, a gas liquified by pressurization alone, or a gas liquified by refrigeration where the released refrigerated liquid forms a pool of 1 cm or less in depth, you should assume that the release duration is 10 minutes.

For a liquid or a gas liquified by refrigeration where the released refrigerated liquid forms a pool deeper than 1 cm, the release duration should be the time required for a pool formed by the released substance to completely vaporize.

Although in some cases it may take longer than 60 minutes for the pool to completely volatilize, most dispersion models use the release rate and calculate the maximum downwind dispersion distance within 60 minutes; therefore, you may enter 60 minutes for your duration even if the duration from your modeling is longer than 60 minutes. You can also enter the exact duration from your modeling up to 9999 minutes.

2.8. Wind speed (meters/second). This value has been set by EPA at 1.5 meters per second, unless you can demonstrate that local meteorological data applicable to your facility show a higher minimum wind speed at all times during the last three years. If you can demonstrate higher minimums existed, these minimums may be used. Provide the wind speed in meters per

second.

2.9. Atmospheric Stability Class. This value has been set by EPA at "F" stability class, unless you can demonstrate that local meteorological data applicable to your facility show a less stable atmosphere at all times during the last three years. If you can demonstrate less stable conditions existed, you may use the appropriate stability class.

2.10. Topography (select one). Indicate whether the local topography is urban or rural. Urban means that there are many obstacles in the immediate area; obstacles include buildings or trees. Rural means that the terrain is generally flat and unobstructed in the immediate area.

2.11. Distance to endpoint (miles). Indicate the distance to the endpoint in miles to 2 significant digits, using the endpoint specified for the chemical in 40 CFR Part 68, Appendix A. Convert your modeling results into miles by dividing the distance in feet by 5280 or yards by 1760. Refer to the following to determine 2 significant digits:

.397 miles	should be reported as...	.40 miles
9.345 miles	should be reported as...	9.3 miles
20.764 miles	should be reported as...	21 miles

2.12. Residential population within distance to endpoint. Estimate the population within the circle with a center at the point of the release and a radius determined by the distance to the endpoint to two significant digits (e.g., 5,500 people rather than 5,483). Population estimates include only residential populations. You should base your population estimates on the latest Census data. Information on sources of Census data can be found on the website.

2.13. Public receptors within distance to endpoint. Public receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Public receptor means locations where members of the public may be exposed to toxic concentrations, radiant heat, or overpressure as a result of the release. Public receptors include locations within the facility's property boundary to which the public has routine and unrestricted access during or outside business hours (e.g. a recreation field). Locations inhabited or occupied by the public at any time without restriction by the source (such as fences or security guards) are public receptors (see the *General Guidance for Risk Management Programs* for more information on identifying public receptors). You do not need to list specific locations or estimate populations at these locations. The presence of these receptors may be determined using local street maps. Select all that apply.

a. Schools. Public and private elementary, secondary, or post-secondary educational institutions (e.g., colleges).

b. Residences

c. Hospitals

d. Prisons or Correctional facilities

e. Recreation areas. Including stadiums, parks, and public pools.

f. Major commercial, office, or industrial areas. Including industrial parks, office buildings, shopping malls, commercial areas, and commercial farms.

g. Other (Specify). Include any other additional information here.

2.14. Environmental receptors within distance to endpoint. Environmental receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Environmental receptor means natural areas, such as national or state parks, forests, or monuments; officially designated wildlife sanctuaries, preserves, refuges, or areas; and federal wilderness areas, that could be exposed at any time to toxic concentrations, radiant heat, or overpressure as a result of the release. Environmental receptors can be identified on local U.S. Geological Survey maps, which can be found at many libraries. Select all that apply.

a. National or state parks, forests, or monuments
b. Officially designated wildlife sanctuaries, preserves, or refuges
c. Federal wilderness areas
d. Other (Specify). Include any other additional information here.

2.15. Passive mitigation considered. Mitigation means specific activities, technologies, or equipment designed or deployed to capture or control substances that have been released to minimize exposure of the public or the environment. Passive mitigation means equipment, devices, or technologies that function without human, mechanical, or other energy input. Select all passive mitigation measures that were considered in defining the release quantity or rate to the worst-case scenario.

a. Dikes. A low wall that acts as a barrier to prevent a spill from spreading.
b. Enclosures. Physical containment of the release within a structure (e.g., a building).
c. Berms. A mound or wall of earth at the top or bottom of a slope that prevents a spill from spreading.
d. Drains. A channel that carries off surface water.
e. Sumps. A pit or tank that catches liquid runoff for drainage or disposal.
f. Other (specify)

2.16. Graphics file name (Optional). You may submit one graphic file to illustrate each release scenario. Click to the button to the right of the Graphic File field (the button with three dots). Locate the graphic file, and press "**Open**."

Graphics will be accepted in either GIF or JPEG file format. These are the most popular graphics formats in use today on the Internet. Most commercial drawing, painting, or scanning software supports these two graphics file formats. You may want to search www.shareware.com for a list of graphics programs that are available for download, either as shareware or evaluation versions.

JPEG (pronounced "jay-peg") is a standardized image compression mechanism. JPEG stands for Joint Photographic Experts Group, the original name of the committee that wrote the standard. JPEG is designed for compressing either full-color or gray-scale images of natural, real-world scenes. It works well on photographs, naturalistic artwork, and similar material.

GIF (tm) is a standard for defining generalized color "raster" images. This "Graphics Interchange Format" allows high-quality, high-resolution graphics to be displayed on a variety of graphics hardware and is intended as an exchange and display mechanism for graphics images.

Section 3: Toxics: Alternative releases

Complete this section for each toxic regulated substance held above the threshold quantity in a Program 2 or Program 3 process.

3.1.a. Chemical Name. Enter the name of the regulated toxic chemical you evaluated in the alternative release scenario.

3.1.b. Percent weight of chemical (if in a mixture). If your alternative scenario involves the release of a mixture containing a regulated substance, enter the percentage weight of the regulated substance in the mixture. Leave blank if it is not a mixture.

3.2. Physical state. Select the physical state of the chemical in the vessel that you are modeling.

a. Gas.
b. Liquid.
c. Gas liquified by pressure.
d. Gas liquified by refrigeration.

3.3. Model used (select one). Select the source of your results for your alternative release analysis or enter another model name in "Other."

a. EPA's *OCA Guidance* Reference Tables or Equations
b. EPA's *RMP Guidance for Ammonia Refrigeration* Reference Tables or Equations
d. EPA's *RMP Guidance for Waste Water Treatment Plants* Reference Tables or Equations
e. EPA's *RMP Guidance for Warehouses* Reference Tables or Equations
f. EPA's *RMP Guidance for Chemical Distributors* Reference Tables or Equations
g. EPA's RMP*Comp™
h. Areal Locations of Hazardous Atmospheres (ALOHA®)
z. Other model (specify)

3.4. Scenario. Select one of the following which describes your alternative release scenario or enter another scenario in Other. (Note: This list is set by the regulation):

a. Transfer Hose Failure. Failure of the connection between two or more vessels.
b. Pipe Leak. Release through a rupture in a pipe.
c. Vessel Leak. Release through a rupture in a vessel.
d. Overfilling. Release due to filling a pipe, vessel, or other container past its capacity.
e. Rupture Disk/Relief Valve. Release due to failure of a rupture disk/relief valve to function properly. A rupture disk/relief valve is a valve that relieves pressure beyond a specified limit; a relief valve closes upon return to normal operating conditions.
f. Excess Flow Valve Failure. Release caused by the failure of excess flow device to function properly and prevent surges from reaching downstream equipment.
g. Other (specify)

3.5. Quantity released (lbs). Enter the quantity of toxic chemical you used for your alternative

scenario analysis in pounds to 2 significant digits. If you have less than 1 pound released, round up to 1 pound. You may want to clarify that in your Executive Summary.

3.6. Release rate (lbs/minute). Enter the rate of release to the outside air in pounds per minute to 1 significant digit. For example:

4.3 pounds per minute should be reported as... 4 pounds per minute
19 pounds per minute should be reported as... 20 pounds per minute

For gases, a gas liquefied by pressurization alone, or a gas liquefied by refrigeration where the released refrigerated liquid forms a pool of 1 cm or less in depth, the release rate should be the total quantity released divided by 10 minutes (this is a regulatory requirement) and multiplied by the appropriate mitigation factor if a mitigated release. See Chapter 4 of the *General Guidance for Risk Management Programs* for more information.

3.7. Release duration (minutes). Indicate the length of time in minutes to the nearest minute for the released quantity to be released to the outside air (from the time the release starts to the time it is mitigated or stopped). See Chapter 4 of the *General Guidance for Risk Management Programs* for more information.

3.8. Wind speed (meters/second). If you used the *OCA Guidance* or one of EPA's model program guidance documents, indicate 3 meters per second. If you modeled your scenario separately, indicate the wind speed used.

3.9. Atmospheric Stability Class. If you used the *OCA Guidance* or one of EPA's model program guidance documents, list "D" stability. If you modeled your scenario separately, indicate the stability class used.

3.10. Topography (select one). Indicate whether the local topography is urban or rural. Urban means that there are many obstacles in the immediate area; obstacles include buildings or trees. Rural means that the terrain is generally flat and unobstructed in the immediate area.

3.11. Distance to endpoint (miles). Indicate the distance to the endpoint in miles to 2 significant digits, using the endpoint specified for the chemical in 40 CFR Part 68, Appendix A. Convert your modeling results into miles by dividing the distance in feet by 5280 or yards by 1760. Refer to the following to determine 2 significant digits:

.397 miles	should be reported as...	.40 miles
9.345 miles	should be reported as...	9.3 miles
20.764 miles	should be reported as...	21 miles

3.12. Residential population within distance to endpoint. Estimate the population within the circle with a center at the point of the release and a radius determined by the distance to the endpoint to two significant digits (e.g., 5,500 people rather than 5,483). Population estimates include only residential populations.

3.13. Public receptors within distance to endpoint. Public receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Public receptor means locations where members of the public may be exposed to toxic concentrations, radiant heat, or overpressure as a result of the release. Public receptors include locations within the facility's property boundary to which the public has routine and unrestricted access during or outside business hours (e.g. a recreation field). Locations inhabited or occupied by the public at any time without restriction by the source (such as fences or security guards) are public receptors (see the *General Guidance for Risk Management Programs* for more information on identifying public receptors). You do not need to list specific locations or estimate populations at these locations. The presence of these receptors may be determined using local street maps. Select all that apply.

a. Schools. Public and private elementary, secondary, or post-secondary educational institutions (e.g., colleges).

b. Residences

c. Hospitals

d. Prisons or Correctional facilities

e. Recreation areas. Including stadiums, parks, and public pools.

f. Commercial, office, or industrial areas. Including industrial parks, office buildings, shopping malls, commercial areas, and commercial farms.

g. Other (Specify). Include any other additional information here.

3.14. Environmental receptors within distance to endpoint. Environmental receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Environmental receptor means natural areas, such as national or state parks, forests, or monuments; officially designated wildlife sanctuaries, preserves, refuges, or areas; and federal wilderness areas, that could be exposed at any time to toxic concentrations, radiant heat, or overpressure as a result of the release. Environmental receptors can be identified on local U.S. Geological Survey maps, which can be found at many libraries. Select all that apply.

a. National or state parks, forests, or monuments

b. Officially designated wildlife sanctuaries, preserves, or refuges

c. Federal wilderness areas

d. Other (Specify). Include any other additional information here.

3.15. Passive mitigation considered. Select all passive mitigation measures that were considered in defining the release quantity or rate of the alternative release scenario.

a. Dikes. A low wall that acts as a barrier to prevent a spill from spreading.

b. Enclosures. Physical containment of the release within a structure (e.g., a building).

c. Berms. A mound or wall of earth at the top or bottom of a slope that prevents a spill from spreading.

d. Drains. A channel that carries off surface water.

e. Sumps. A pit or tank that catches liquid runoff for drainage or disposal.

f. Other (specify). List a type other than what is listed above.

3.16. Active mitigation considered. Active mitigation means equipment, devices, or technologies that need human, mechanical, or other energy input to function. By regulation, active mitigation can be considered in determining the alternative scenario, but not in determining the worst case scenario. Select all that were considered in defining the release quantity or rate of the alternative release scenario.

a. Sprinkler systems. A system for protecting a building against fire by means of overhead pipes which convey an extinguishing fluid through heat activated outlets.
b. Deluge systems. A system to overflow an area of a release with water or other extinguishing fluid.
c. Water curtain. A spray of water from a horizontal pipe through nozzles; the curtain may be activated manually or automatically.
d. Neutralization. Making a toxic chemical harmless through chemical reaction.
e. Excess flow valve. A device in the outlet of a vessel at a hose connection that stops the flow of liquid or gas if the piping or hoses downstream fail and a predetermined excess flow rate is reached.
f. Flares. A device for disposing of combustible gases from a chemical process by burning them in the open.
g. Scrubbers. A pre-release protection measure that uses water or aqueous mixtures containing scrubbing reagents to remove discharging liquids and possibly also treating the discharging chemical.
h. Emergency shutdown systems. Controls that are triggered when process limits are exceeded and that shut down that process.
i. Other (specify)

3.17. Graphics file name (Optional). You may submit one graphic file to illustrate each release scenario. Click to the button to the right of the Graphic File field (the button with three dots). Locate the graphic file, and press "**Open**."

Graphics will be accepted in either GIF or JPEG file format. See 2.23 for an explanation of GIF and JPEG.

Section 4 Flammables: Worst-Case

Complete this section for each flammable worst-case scenario you report.

4.1. Chemical. Enter the name of the regulated flammable chemical you evaluated in the worst-case scenario.

4.2. Model used (select one). Select the source of your results for your worst-case release analysis or enter another model name in "Other."

a. EPA's *OCA Guidance* Reference Tables or Equations
c. EPA's *RMP Guidance for Propane Storage Facilities* Reference Tables or Equations
d. EPA's *RMP Guidance for Waste Water Treatment Plants* Reference Tables or Equations
e. EPA's *RMP Guidance for Warehouses* Reference Tables or Equations
f. EPA's *RMP Guidance for Chemical Distributors* Reference Tables or Equations
g. EPA's RMP*Comp™
z. Other model (specify)

4.3. Scenario. This data element is fixed. By regulation, for flammables, the worst case assumes an instantaneous release and a **vapor cloud explosion**, which is an explosion of a cloud containing a flammable vapor or gas and air.

4.4. Quantity released (lbs). Enter the quantity of flammable substance you used for your worst-case scenario analysis in pounds to 2 significant digits. This is the total amount that would be lost from a vessel or pipeline used in the calculation of distance to 1 psi reported in 4.6. See Chapter 2 on Determining Worst-Case Scenarios in the *RMP Offsite Consequence Analysis Guidance* for more details. Here's how to report the quantity to 2 significant digits:

5,333 pounds	should be reported as...	5,300 pounds
107,899 pounds	should be reported as...	110,000 pounds

If you have less than 1 pound released, round up to 1 pound. You may want to clarify that in your Executive Summary.

4.5. Endpoint used. This data element is fixed. Because the scenario is fixed by regulation as vapor cloud explosions, the endpoint which applies to vapor cloud explosions is fixed at **1 psi** overpressure.

4.6. Distance to endpoint (miles). Indicate the distance to the endpoint in miles to 2 significant digits, using the endpoint specified for the chemical in 40 CFR Part 68, Appendix A. Convert your modeling results into miles by dividing the distance in feet by 5280 or yards by 1760. Refer to the following to determine 2 significant digits:

.397 miles	should be reported as...	.40 miles
9.345 miles	should be reported as...	9.3 miles
20.764 miles	should be reported as...	21 miles

4.7. Residential population within distance to endpoint. Estimate the population within the circle with a center at the point of the release and a radius determined by the distance to the endpoint to two significant digits (e.g., 5,500 people rather than 5,483). Population estimates include only residential populations.

4.8. Public receptors within distance to endpoint. Public receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Public receptor means locations where members of the public may be exposed to toxic concentrations, radiant heat, or overpressure as a result of the release. Public receptors include locations within the facility's property boundary to which the public has routine and unrestricted access during or outside business hours (e.g. a recreation field). Locations inhabited or occupied by the public at any time without restriction by the source (such as fences or security guards) are public receptors (see the *General Guidance for Risk Management Programs* for more information on identifying public receptors). You do not need to list specific locations or estimate populations at these locations. The presence of these receptors may be determined using local street maps. Select all that apply.

a. Schools. Public and private elementary, secondary, or post-secondary educational institutions (e.g., colleges).

b. Residences

c. Hospitals

d. Prisons or Correctional facilities

e. Recreation areas. Including stadiums, parks, and public pools.

f. Commercial, office, or industrial areas. Including industrial parks, office buildings, shopping malls, commercial areas, and commercial farms.

g. Other (Specify). Include any other additional information here.

4.9. Environmental receptors within distance to endpoint. Environmental receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Environmental receptor means natural areas, such as national or state parks, forests, or monuments; officially designated wildlife sanctuaries, preserves, refuges, or areas; and federal wilderness areas, that could be exposed at any time to toxic concentrations, radiant heat, or overpressure as a result of the release. Environmental receptors can be identified on local U.S. Geological Survey maps, which can be found at many libraries. Select all that apply.

a. National or state parks, forests, or monuments

b. Officially designated wildlife sanctuaries, preserves, or refuges

c. Federal wilderness areas

d. Other (Specify). Include any other additional information here.

4.10. Passive mitigation considered. Select all passive mitigation measures that were considered in defining the release quantity or rate for the worst-case scenario.

a. Blast Walls. A heavy wall used to isolate buildings or areas that contain highly combustible or explosive materials.

b. Other (specify)

4.11. Graphics file name (Optional). You may submit one graphic file to illustrate each release scenario. Click to the button to the right of the Graphic File field (the button with three dots). Locate the graphic file, and press "**Open**."

Graphics will be accepted in either GIF or JPEG file format. See 2.16 of this manual for an explanation of GIF and JPEG.

Section 5: Flammables: Alternative Releases

Complete this section for each flammable alternative release scenario you report.

5.1. Chemical. Enter the name of the regulated flammable chemical you evaluated in the alternative release scenario.

5.2. Model used (select one). Select the source of your results for your alternative release analysis or enter another model name in "Other."

a. EPA's *OCA Guidance* Reference Tables or Equations
c. EPA's *RMP Guidance for Propane Storage Facilities* Reference Tables or Equations
d. EPA's *RMP Guidance for Waste Water Treatment Plants* Reference Tables or Equations
e. EPA's *RMP Guidance for Warehouses* Reference Tables or Equations
f. EPA's *RMP Guidance for Chemical Distributors* Reference Tables or Equations
g. EPA's RMP*Comp™
z. Other model (specify)

5.3. Scenario. Select one of the following or enter another scenario in Other:

a. Vapor Cloud Explosion. An explosion of a cloud containing a flammable vapor or gas and air.
b. Fireball. The atmospheric burning of a fuel-air cloud in which the energy is mostly emitted in the form of radiant heat. As the buoyancy forces of the hot gases begin to dominate, the burning cloud rises and becomes spherical in shape. Often caused by the ignition of a vapor cloud of a flammable substance.
c. BLEVE. Boiling Liquid Expanding Vapor Explosion (BLEVE) is used to describe the sudden rupture of a vessel/system containing liquefied flammable gas under pressure due to radiant heat flux. The pressure burst and the flashing of the liquid to vapor creates a blast wall and potential missile damage, and immediate ignition of the expanding fuel-air mixture leads to an intense combustion creating a fireball.
d. Pool Fire. The combustion of material evaporating from a layer of liquid at the base of the fire.
e. Jet Fire. Gas or liquid discharging or venting from a rupture will form a jet that "blows" into the atmosphere in the direction the hole is facing, all the while entraining and mixing with air. If the jet is flammable and encounters an ignition source, a flame jet may form.
f. Vapor Cloud Fire. A flash fire results from the ignition of a released flammable cloud in which there is essentially no increase in the combustion rate.
g. Other (specify)

5.4. Quantity released (lbs). Enter the quantity of the flammable substance you used for your alternative scenario analysis in pounds to 2 significant digits. If you have less than 1 pound released, round up to 1 pound. You may want to clarify that in your Executive Summary.

5.5. Endpoint used. For vapor cloud explosions, the endpoint is 1 psi overpressure; for a fireball the endpoint is 5 kW/m^2 for 40 seconds; for vapor cloud fires or jet fires, a lower flammability limit (expressed as a percentage) may be listed as specified in NFPA documents or other generally recognized sources. These are listed in the *OCA Guidance*.

5.6. Distance to endpoint (miles). Indicate the distance to the endpoint in miles to 2 significant digits, using the endpoint specified for the chemical in 40 CFR Part 68, Appendix A. Convert your modeling results into miles by dividing the distance in feet by 5280 or yards by 1760. Refer to the following to determine 2 significant digits:

.397 miles	should be reported as...	.40 miles
9.345 miles	should be reported as...	9.3 miles
20.764 miles	should be reported as...	21 miles

5.7. Residential population within distance to endpoint. Estimate the population within the circle with a center at the point of the release and a radius determined by the distance to the endpoint to two significant digits (e.g., 5,500 people rather than 5,483). Population estimates include only residential populations.

5.8. Public receptors within distance to endpoint. Public receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Public receptor means locations where members of the public may be exposed to toxic concentrations, radiant heat, or overpressure as a result of the release. Public receptors include locations within the facility's property boundary to which the public has routine and unrestricted access during or outside business hours (e.g. a recreation field). Locations inhabited or occupied by the public at any time without restriction by the source (such as fences or security guards) are public receptors (see the *General Guidance for Risk Management Programs* for more information on identifying public receptors). You do not need to list specific locations or estimate populations at these locations. The presence of these receptors may be determined using local street maps. Select all that apply.

a. Schools. Public and private elementary, secondary, or post-secondary educational institutions (e.g., colleges).

b. Residences

c. Hospitals

d. Prisons or Correctional facilities

e. Recreation areas. Including stadiums, parks, and public pools.

f. Commercial, office, or industrial areas. Including industrial parks, office buildings, shopping malls, commercial areas, and commercial farms.

g. Other (Specify). Include any other additional information here.

5.9. Environmental receptors within distance to endpoint. Environmental receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Environmental receptor means natural areas, such as national or state parks, forests, or monuments; officially designated wildlife sanctuaries, preserves, refuges, or areas; and federal wilderness areas, that could be exposed at any time to toxic concentrations,

radiant heat, or overpressure as a result of the release. Environmental receptors can be identified on local U.S. Geological Survey maps, which can be found at many libraries. Select all that apply.

a. National or state parks, forests, or monuments
b. Officially designated wildlife sanctuaries, preserves, or refuges
c. Federal wilderness areas
d. Other (Specify). Include any other additional information here.

5.10. Passive mitigation considered. Select all passive mitigation measures that were considered in defining the release quantity or rate for the alternative scenario.

a. Dikes. A low wall that acts as a barrier to prevent a spill from spreading.
b. Fire Walls. A wall constructed to prevent the spread of fire.
c. Blast Walls. A heavy wall used to isolate buildings or areas that contain highly combustible or explosive materials.
d. Enclosures. Physical containment of the release within a structure (e.g., a building).
f. Other (specify)

5.11. Active mitigation considered. Active mitigation means equipment, devices, or technologies that need human, mechanical, or other energy input to function. Select all that were considered in defining the release quantity or rate of the alternative release scenario.

a. Sprinkler Systems. A system for protecting a building against fire by means of overhead pipes which convey an extinguishing fluid through heat activated outlets.
b. Deluge Systems. A system to overflow an area of a release with water or other extinguishing fluid.
c. Water Curtain. A spray of water from a horizontal pipe through nozzles, the curtain may be activated manually or automatically.
d. Excess Flow Valve. A system for diverting overflow.
e. Other (specify)

5.12. Graphics file name (Optional). You may submit one graphic file to illustrate each release scenario. Click to the button to the right of the Graphic File field (the button with three dots). Locate the graphic file, and press "**Open**."

Graphics will be accepted in either GIF or JPEG file format. See 2.16 of this manual for an explanation of GIF and JPEG.

Section 6: Five-year accident history

Although much of the RMP is a summary of the risk management program at your facility, this portion of the RMP includes all of the five-year accident history information required under 40 CFR § 68.42. Therefore, for this section of the RMP you can simply insert the data you compiled for § 68.42. Only report accidents involving listed substances.

A reportable accident involves a part 68 regulated substance in a covered process if the release resulted in deaths, injuries, property damage onsite, or known offsite deaths, injuries, property damage, or environmental damage, evacuations, or sheltering-in-place.

Did your facility have any reportable accidents in the last 5 years? If your facility did not have any reportable accidents in the last five years, then check no to confirm and leave the rest of this section blank. If your facility did have reportable accidents in the last five years, then fill in this section for each accident.

6.1. Date of accident. Indicate the date on which the accident occurred.

6.2. Time accident began. Indicate the time the release began.

6.3. NAICS Code of process involved. Enter the NAICS code that most closely corresponds to the process; it will not necessarily be the same NAICS code for your facility as a whole. As described in *Registration*, the NAICS code system classifies businesses by fitting them into descriptive categories that correspond to five-digit or six-digit codes. Appendix B of the *General Guidance for Risk Management Programs* provides the NAICS codes for the industry sectors most likely to subject to 40 CFR Part 68. You may also access the full list on-line at ***http://www.census.gov/epcd/www/naics.html***.

Although you are only required to report accidents on covered processes, you may choose to report other accidents as well. Therefore, RMP*Submit provides the full list of NAICS codes to choose from.

6.4. Release duration. Indicate the approximate length of time of the release in hours and minutes. (Format: HHHMM)

6.5.a.i. Chemical name. Indicate the regulated substance(s) released. Use the name of the substance as listed in Section 68.130 rather than a synonym. If the release was a NFPA-4 flammable mixture containing regulated flammables, you may list it as a "flammable mixture" and list all of the regulated substances contained in the mixture. For the quantity released, you only report the quantity of the entire mixture, not the individual substances. Only report chemicals that are listed substances.

6.5.a.ii. CAS number. Provide the Chemical Abstracts Service (CAS) registry number for each chemical name in 6.5.a.i. above. CAS numbers are listed in 40 CFR § 68.130 and in EPA's

General Guidance for Risk Management Programs . RMP*Submit will automatically generate the CAS # based on the chemical name chosen. For flammable mixtures, because there is no CAS #, leave this field blank. RMP*Submit will assign a "dummy" CAS number of all zeros for flammable mixtures.

6.5.b. Quantity released. Estimate the amount of each substance released in pounds. The amount should be estimated to two significant digits, or as close to that as possible. For example, if you estimate that the release was between 850 and 900 pounds, provide a best guess. We realize that you may not know precise quantities.

For toxics in a mixture, determine the maximum quantity of the mixture and then multiply the weight of the regulated toxic substance to determine the quantity; **do not report the weight of the entire mixture.** For example, if you have a 100,000 pound mixture of ammonia at 20% concentration, then you would multiply the weight percent (20%) by the total quantity (100,000 pounds) to determine the quantity released of ammonia was 20,000 pounds.

For flammables in a mixture that meets the criteria of NFPA-4, report the entire quantity of the mixture, rather than that of the individual regulated substances.

6.5.c. Percent weight of toxic chemical in mixture. If a toxic substance was in a mixture when released, indicate the percentage weight of the regulated substance in the mixture.

6.6. Release event. Indicate which of the following release events best describes your accident. Select at least one:

a. Gas Release. A gas release is a release of the substance as a gas (rather than vaporized from a liquid). If you hold a gas liquefied under refrigeration, report the release as a liquid spill.

b. Liquid Spill/Evaporation. A liquid spill/ evaporation is a release of the substance in a liquid state with subsequent vaporization.

c. Fire. A fire is a combustion producing light, flames, and heat.

d. Explosion. An explosion is a rapid chemical reaction with the production of noise, heat, and violent expansion of gases.

e. Uncontrolled /runaway reaction. A release event caused by an uncontrolled chemical reaction that generates excessive heat, pressure, or harmful reaction products. Such events may involve highly exothermic chemical reactions, self-reactive substances (e.g., substances that undergo polymerization), unstable, explosive, or spontaneously combustible substances, substances that react strongly with water or other contaminants, oxidizers, peroxide-forming substances, or other types of chemical reactions that generate harmful products or byproducts. This category of release event may often occur in conjunction with one of the previous categories. In such cases, be sure to check this category in addition to any other applicable release event category (e.g., explosion). The burning of ordinary flammable substances is not typically included in this category.

6.7. Release source. Indicate all that apply.

a. Storage Vessel. A storage vessel is a container used only to store or hold (as opposed to react, mix, or move) a regulated substance. Storage vessels include transportation containers (e.g., railcars or tank trucks) being used for on-site storage.
b. Piping. Piping refers to a system of pipes used to carry a fluid (gas, liquid or solid solution, etc.).
c. Process Vessel. A process vessel is a container in which regulated substances under certain conditions (eg. Temperature, pressure) participate in a process (substances are manufactured, blended to forma mixture, reacted to convert them into some other final product or form, or heated to purify).
d. Transfer Hose. A transfer hose is a flexible tube used to connect, often temporarily, two or more vessels.
e. Valve. A valve is a device used to regulate the flow in piping systems or machinery. Relief valves open to release pressure in vessels.
f. Pump. A pump is a device that raises, transfers, or compresses fluids or that attenuates gases by suction or pressure or both.
g. Joint. The surface at which two or more mechanical components are united.
h. Other. Specify other source of the release.

6.8. Weather conditions at time of event (if known). This information is important to those concerned with modeling the effects of accidents. Reliable information from those involved in the incident or from an on-site weather station is ideal. However, the rule does not require your facility to have an on-site weather station. If you do not have an on-site weather station, use information from your local weather station, airport, or other source of meteorological data. Historical wind speed and temperature data (but not stability data) can be obtained from the National Climatic Data Center (NCDC) at (828) 271-4800; NCDC staff can also provide information on the nearest weather station. To the extent possible, complete the following:

a.i. Wind speed. Wind speed is an estimate of how fast the wind is traveling.

a.ii. Wind speed units. Indicate the units in which the speed is expressed as either miles per hour, meters per second, or knots.

a.iii. Wind direction. Wind direction is the direction from which the wind comes. For example, a wind that blows from east to west would be described as having an eastern wind direction. Describe wind direction as one of the 16 standard compass readings [N, S, E, W, NE, SE, NW, SW, NNE, ENE, ESE, SSE, SSW, WSW, WNW, NNW], using the abbreviation. For example, wind direction must be reported as S for South, NE for Northeast, or SSW for South-Southwest.

b. Temperature. The ambient temperature at the scene of the accident in degrees Fahrenheit. If you did not keep a record, you can use the high (for daytime releases) or low (nighttime releases) for the day. Local newspapers publish these data.

c. Atmospheric Stability Class. Depending on the amount of incoming solar radiation

as well as other factors, the atmosphere may be more or less turbulent at any given time. Meteorologists have defined six atmospheric stability classes, each representing a different degree of turbulence in the atmosphere. When moderate to strong incoming solar radiation heats air near the ground, causing it to rise and generating large eddies, the atmosphere is considered unstable, or relatively turbulent. Unstable conditions are associated with stability classes A and B. When solar radiation is relatively weak, air near the surface has less of a tendency to rise and less turbulence develops. In this case, the atmosphere is considered stable or less turbulent with weak winds; the stability class is E or F. Stability classes D and C represent conditions of more neutral stability, or moderate turbulence. Neutral conditions are associated with relatively strong wind speeds and moderate solar radiation. Enter either A, B, C, D, E, or F.

Exhibit 7. Atmospheric Stability Classes

SURFACE WIND SPEED AT 10 METERS ABOVE GROUND		**DAY**			**NIGHT***	
Meters per second	Miles per hour	Incoming Solar Radiation			Thinly Overcast or $ 4/8 low cloud	# 3/8 Cloud
		Strong**	Moderate	Slight***		
< 2	<4.5	A	A-B	B		
2-3	4.5-7	A-B	B	C	E	F
3-5	7-11	B	B-C	C	D	E
5-6	11-13	C	C-D	D	D	D
>6	>13	C	D	D	D	D

*Night refers to one hour before sunset to one hour after dawn.
** Sun high in the sky with no clouds.
*** Sun low in the sky with no clouds.

d. Precipitation present. Precipitation may take the form of hail, mist, rain, sleet, or snow. Check the box to indicate there was precipitation at the time of the accident.

e. Unknown weather conditions. If you have no record for any of the weather data, indicate "unknown." We realize that you may not have weather data for accidents that have occurred prior to June 1996. You must, however, collect these data during future accident investigations.

6.9. On-site impacts. Complete each of the following about on-site effects. Enter a number for each entry; if there were no impacts, enter 0.

a. Deaths. Indicate the number of on-site deaths that are attributable to the accident or mitigation activities. On-site deaths include anyone (employees, contractors, responders, or others) who was killed by direct exposure to toxic concentrations, radiant heat, or overpressures from the accidental release or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., flying glass debris or other projectiles). If there were no on-site deaths, enter 0. Specify the deaths as:

a.i. Employees & contract employees
a.ii. Public responders (example, fire department personnel)
a.iii. Public (example, visitors)

b. Injuries. An injury is any effect that results either from direct exposure to toxic concentrations, radiant heat, or overpressures from the accidental release or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion) and that requires medical treatment or hospitalization. Medical treatment means treatment, other than first aid, administered by a physician or registered professional personnel under standing orders from a physician (OSHA OII Log, 1904.12). Your OSHA occupational injury and illness log will help complete these items for employees. If there were no on-site injuries, enter 0. Specify the injuries as:

a.i. Employees & contract employees
a.ii. Public responders (example, fire department personnel)
a.iii. Public (example, visitors)

c. Property damage. Estimate the value of the equipment or business structures at your facility that were damaged by the accident or mitigation activities. Record the value in American dollars. Insurance claims may provide this information. Do **not** include any losses that you may have incurred as a result of business interruption. If there was no on-site property damage or no known damage, enter 0.

6.10. Known off-site impacts. These are impacts that you should be aware of (e.g., from media reports) or that were reported to your facility. You are **not** required to conduct an additional investigation to determine off-site impacts. Enter a number for each entry; if there were no impacts, enter 0.

a. Deaths. Indicate the number of off-site deaths that are attributable to the accident or mitigation activities. Off-site deaths include anyone who was killed by direct exposure to toxic concentrations, radiant heat, or overpressures from the accidental release or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion). Responders killed while on site responding to the release are considered on-site deaths and should not be reported here (See 6.9, On-Site Impacts). If there were no known off-site deaths, enter 0.

b. Hospitalizations. Indicate the number of people requiring hospitalization. Hospitalization means any effect that results either from direct exposure to toxic concentrations, radiant heat, or overpressures from accidental releases or from indirect

consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion) and that requires hospitalization (i.e., admittance to the hospital). If there were no known off-site hospitalizations, enter 0.

c. Other medical treatment. Indicate the number of people requiring medical treatment. Medical treatment means any effect that results either from direct exposure to toxic concentrations, radiant heat, or overpressures from accidental releases or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion) and that requires medical treatment. If there was no known medical treatment, enter 0.

d. Evacuated. Estimate the number of people who were evacuated to prevent exposure that might have resulted from the accident. A total count of the number of people evacuated is preferable to the number of houses evacuated. People who were ordered to move simply to improve access to the site for emergency vehicles are not considered to have been evacuated, but people who normally-occupy a building or area and who are prevented from entering or returning (i.e., blockaded) in order to prevent potentially harmful exposure should be considered to have been evacuated. If there were no evacuations, enter 0.

e. Sheltered-in-place. Estimate the number of people who were sheltered-in-place during the accident. Sheltering-in-place occurs when the incident commander orders residents to remain inside their home or place of work until the emergency has ended to prevent exposure to the substance. Usually these are associated with an emergency broadcast or similar method of mass notification by response agencies. If no one sheltered in place, enter 0.

f. Property damage. Estimate the value of the equipment or structures offsite that were damaged by the accident or mitigation activities. Record the value in American dollars. Insurance claims may provide this information. Any level of offsite property damage triggers reporting. There is no lower limit below which you would not have to report. If there was no property damage, enter 0.

g. Environmental damage. Indicate whether any environmental damage occurred and specify the type. The damage is not limited to environmental receptors listed in the rule. Any damage to the environment (e.g., dead or injured animals, defoliation, water contamination) must be reported. Select all that apply.

- g.1. Fish or animal kills.
- g.2. Tree, lawn, shrub, or crop damage
- g.4. Water contamination
- g.4. Soil contamination
- g.5. Other (specify)

6.11. Initiating event. Select the one initiating event that best describes the immediate cause of

the accident.

a. Equipment Failure. A device or piece of equipment failed or did not function as designed. For example, the vessel wall corroded or cracked.

b. Human Error. An operator performed a task improperly, either by failing to take the necessary steps or by taking the wrong steps.

c. Natural (weather conditions, earthquake). Weather conditions, such as lightning, hail, ice storms, tornados, hurricanes, earthquakes, floods, or high winds, caused the accident.

d. Unknown.

6.12. Contributing factors. These are factors that contributed to the accident occurring, but were not the initiating event. If you conducted an investigation of the release, you should have identified factors that led to the initiating event. Select all that apply.

a. Equipment failure. A device or piece of equipment failed to contain substance or did not function as designed, thereby allowing a substance to be released.

b. Human error. A person performed an operation improperly or made a mistake which resulted in an accident.

c. Improper procedures. The procedure did not reflect the proper method of operation, the procedure omitted steps that affected the accident, or the procedure was written in a manner that allowed for misinterpretation of the instructions.

d. Overpressurization. The process was operated at pressures exceeding the design working pressure.

e. Upset condition. Release was caused by incorrect process conditions (e.g., increased temperature or pressure).

f. By-pass condition. The failure occurred in a pipe, channel, or valve that diverts fluid flow from the main pathway when design process or storage conditions are exceeded (e.g., overpressure). By-pass conditions may be designed to release the substance to restore acceptable process or storage conditions and prevent more severe consequences (e.g., explosion).

g. Maintenance activity or inactivity. The failure occurred because of maintenance activity or inactivity. An example of maintenance activity is putting the wrong gasket on a tank fitting. An example of maintenance inactivity is storage racks that remained unpainted for so long that corrosion caused the metal to fail.

h. Process design failure. The failure resulted from an inherent flaw in the design of the process (e.g., pressure needed to make product exceeds the design pressure of the vessel).

i. Unsuitable equipment. The equipment used was incorrect for the process. For example, the forklift was too large for the corridors.

j. Unusual weather conditions. Weather conditions, such as lightning, hail, ice storms, tornados, hurricanes, earthquakes, floods, or high winds caused the accident.

k. Management error. The failure occurred due to any management error or management system error not included in categories a through j above. Such factors may include inadequate training, inadequate oversight, inadequate hazard analysis, or other management-related factors.

l. Other (specify)

6.13. Off-site responders notified (select one). Indicate whether response agencies (e.g., police, fire, medical services) were notified. Check one of the following choices:

a. Notified Only
b. Notified and Responded
c. No, not notified
d. Unknown.

6.14. Changes introduced as a result of the accident. Indicate any measures that you have taken at the facility to prevent recurrence of the accident. Select at least one.

a. Improved/upgraded equipment. A device or piece of equipment that did not function as designed was repaired or replaced.

b. Revised maintenance. Maintenance procedures were clarified or changed to ensure appropriate and timely maintenance including inspection and testing (i.e., increasing the frequency of inspection or adding a testing method).

c. Revised training. Training programs were clarified or changed to ensure that employees and contract employees are aware of and are practicing correct safety and administrative procedures.

d. Revised operating procedures. Operating procedures were clarified or changed to ensure that employees and contract employees are trained on appropriate operating procedures.

e. New process controls. New process designs and controls were installed to correct problems and prevent recurrence of an accidental release.

f. New mitigation systems. New mitigation systems were initiated to limit the severity of accidental releases.

g. Revised emergency response plan. The emergency response plan was revised.

h. Changed process. Process was altered to reduce the risk (e.g., process chemistry was changed).

i. Reduced inventory. Inventory was reduced at the facility to reduce the potential release quantities and the magnitude of the hazard.

j. None. No changes initiated at facility as a result of the accident (i.e., none were necessary or technically feasible). There may be some accidents that could not have been

prevented because they were caused by events that are too rare to merit additional steps. For example, if a tornado hit your facility and you are located in an area where tornados are very rare, it may not be reasonable to design a “tornado-proof” process even if it is technically feasible.

k. Other (specify).

Overview of Prevention Program (Sections 7-8)

How Must Prevention Program Data Be Reported?

Prevention program data must be reported on a process-by-process basis. In other words, you must fill out the prevention program section of the RMP for each Program 2 or Program 3 process you have that is subject to the RMP rule.

How to report the prevention program for a process depends on how many units the process contains and whether the prevention program applies different safeguards to different units in the process. The RMP rule broadly defines "process" to include interconnected or co-located production and storage units. Under the definition, multiple units and, in some cases, whole sources may be a single "process" for purposes of the RMP rule. For multiple unit processes, EPA recognizes that prevention program implementation may involve different safeguards for different units in the process. For example, different production units may have different operating procedures. At the same time, some safeguards, such as management of change procedures, may apply to all the units in the process. To accommodate these circumstances, RMP*Submit includes two features which make it easier to indicate how a prevention program applies to a multiple-unit process.

If your process consists of two or more units and different safeguards apply to different units in that process, you can report the prevention program for that process in one of the two following ways. You must, however, use one of the two ways to report your program.

- Use the description field in the prevention program to describe in narrative form how your prevention program is implemented with respect to the different units in the process. You could start by listing the common prevention program elements you implement for all of the units (e.g., use of an alarm system or standard management of change procedures). You would then indicate what additional prevention program elements you employ for specified units (e.g., use of a dike for certain process units).

- Report your prevention program for the process on a unit-by-unit basis by filling out the prevention program portion of the RMP for every unit in the process, rather than for the process as a whole. That way, the differences in the program as it relates to each unit will be clear from the report. However, as noted above, some aspects of a prevention program may be common to all units. To simplify the reporting of common elements, RMP*Submit has an autocopy feature that allows you to enter data elements only once. This feature works by entering the common elements into RMP*Submit and then hitting the COPY function at the bottom of the screen to copy that information to another prevention program "record." (If you are submitting on paper, you can achieve the same effect by filling in the common data elements first and then copying the pages containing the common data elements.) To complete the prevention program record for each unit, enter the remaining data which is unique to each.

If your process consists of only one unit, or you apply every element of your prevention program to all the units in the process, you are **not** required to complete the description section of this portion of the RMP or report on a unit-by-unit basis. However, you may use the description field to elaborate on your prevention program.

Many prevention program data elements ask you to enter the date for the most recent "review or revision" of a prevention program element required by part 68. For your first RMP submission, if you are subject to prevention program requirements **only** under the RMP rule (as opposed to other federal or state laws), you should enter the date by which you completed the prevention program element being addressed. For instance, for data element number 7.5, *"Date of most recent review or revision of operating procedures,"* you should enter the date by which you met the operating procedures requirements of section 68.69(a) of the RMP rule (if applicable to you). Since this requirement must be met by the time your first RMP is due, you may enter the date you complete or submit your first RMP. In the case of data element number 7.3 (*"Date on which safety information was last reviewed or revised"*), you should enter the date you met the requirement of section 68.65(a) (if applicable to you), since section 68.65(a) requires you to meet the requirement **before** you conduct the process hazard analysis for the process.

If you are subject to prevention program requirements under other federal or state laws, you may be in compliance with RMP prevention program requirements as a result of complying with the other laws. Sources subject to OSHA PSM, for example, may already meet RMP prevention program requirements for Program 3 processes, since those requirements are nearly identical to OSHA PSM prevention program requirements. For your first RMP submission, if you have fulfilled RMP prevention program requirements in complying with other federal or state laws, you should enter the date you complied with the requirement or the date you last reviewed or revised the relevant aspect of your program, whichever is later. For example, OSHA PSM and the RMP rule both require covered sources to compile and update (under specified circumstances) process safety information. If you previously compiled the information for purposes of complying with OSHA PSM and you have not updated it since, you should enter the date you compiled it for OSHA in your RMP. If you have updated the information since compiling it, you should enter the date of the update.

For subsequent RMP submissions, you should enter the date by which you completed any review or revision of a prevention program element. Several prevention program elements must be reviewed and, if necessary, revised following a change affecting the process (see, e.g., requirement to update safety information in section 68.75(d)). Under the compliance audit requirement of sections 68.58 or 68.79 of the RMP Program, all prevention program elements must be reviewed and, if appropriate, revised every three years. When you re-submit your next RMP (due every 5 years or sooner based on the requirements in section 68.190), you are required to fully update and certify all nine sections of the RMP. If, by the time you re-submit, you have reviewed or revised one or more prevention program elements as a result of a change or an audit, you must enter the date of your review or revision.

Section 7: Prevention Program for Program 3 Processes

Complete this section for each prevention program you report for a Program 3 process.

Prevention program description. If different safeguards apply to different units in your process, use this field to explain how the prevention program for the process relates to the different units in the process. For example, "This process includes three interconnected production units, A, B, and C. Everything in this prevention program applies to all three units, with the following exceptions:
- The dates of the PHA, which are 01/02/97, 6/5/96 and 4/3/96 for units A, B and C, respectively.
- Production unit A uses only a scrubber as a process control, while units B and C have relief valves and scrubbers.
- The water curtain indicated as a mitigation measure applies only to production unit C."

If you have so many "exceptions" that it gets too complicated to explain as above, but you still have many common data elements, you can report your prevention program on a unit-by-unit basis. To simplify such reporting, you can use the autocopy feature in RMP*Submit so that you only have to enter the common data elements once. First, enter the common elements into RMP*Submit (or the paper form, if you are submitting in paper), then hit the COPY function at the bottom of the screen to copy that information to another prevention program "record" (if you are submitting in paper, photocopy the pages). To complete the prevention program record for each unit, enter the remaining data which is unique to each.

7.1. NAICS code for the process. Enter the NAICS code that most closely corresponds to the process; it will not necessarily be the same NAICS code for your facility as a whole. The NAICS code that you choose must be one that you've already entered in the Registration Section for the covered process. If you have two processes with the same NAICS code, explain in the above description field which of the two processes this prevention program relates to. RMP*Submit will produce a list of the NAICS codes that you have already entered for your registered processes as a pick list for this data element. As described in the *Registration* section of this manual, the NAICS code system classifies businesses by type using descriptive categories that correspond to five-digit or six-digit codes.

7.2. Chemical name(s). For each prevention program, provide the names of all regulated substances held above the threshold in the covered units. If you have an NFPA-4 flammable mixture containing regulated flammables, you may list it as a flammable mixture. You do not need to list the individual substances in the flammable mixture.

7.3. Date on which the safety information was last reviewed or revised. The safety information requirements for Program 3 processes can be found at 40 CFR §68.65. For your first RMP submission, enter the date you complied with the requirement of §68.65(a) (compile safety information) for the process or the date you last reviewed or revised the safety information, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other

federal or state laws.) For subsequent RMPs, enter the date the safety information was most recently reviewed or revised. Safety information may be reviewed or revised as a result of, among other things, a change to the process (see §68.75(d)) or a periodic audit of the prevention program (see §68.79(a)). If the safety information was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.4. Process Hazard Analysis (PHA). The PHA requirements for Program 3 processes can be found at 40 CFR §68.67. Provide the following information about the PHA you conducted for the process.

a. Date of last PHA or PHA update. The date you completed or updated your most recent PHA.

b. Technique used. Check any of the following techniques that you used to evaluate the hazards of your process or part of the process (see Chapter 7, Appendix 7-A, of the *General Guidance for Risk Management Programs* for a description of these techniques). Select at least one:

b.1. What If
b.2. Checklist
b.3. What If/Checklist (combined)
b.4. HAZOP
b.5. Failure Mode & Effects Analysis
b.6. Fault Tree Analysis
b.7. Other (specify)

7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update. Enter the date you completed or expect to complete any changes resulting from the PHA. This may be blank if there were no changes.

7.4.d. Major hazards identified (select at least one). Any major hazards that were identified for the process or part of the process as a result of the PHA. Major hazards are described below.

7.4.d. Major Hazard	Description
1. Toxic Release	If an accidental release occurred, a regulated toxic substance could be released. For listed toxics, a toxic release will always be a major hazard.
2. Fire	Process upsets, leaks, equipment failure, etc., could result in a fire. For listed flammables, fire will always be a major hazard. Fire may also be a hazard for some listed toxics, and in some processes could cause a toxic release.

7.4.d. Major Hazard	Description
3. Explosion	Confined or unconfined vapor cloud explosions. For listed flammables, explosion will generally be a major hazard. Explosion may also be a hazard for toxics, especially those handled under extreme conditions.
4. Runaway reaction	An uncontrolled reaction that proceeds at an increasing rate.
5. Polymerization	A chemical reaction that produces the bonding of two or more monomers.
6. Overpressurization	Instantaneous energy release or detonation.
7. Corrosion	Corrosion could lead to destruction of equipment and release of a regulated substance. Corrosion is likely to be a major hazard for substances identified as corrosives on MSDSs unless the equipment used limits the hazard.
8. Overfilling	Filling a tank or vessel beyond its maximum safe capacity.
9. Contamination	A release could occur if inappropriate substances are introduced into storage or process vessels. Contamination may be a major hazard when controlling inappropriate substances (e.g., H_2O) is difficult.
10. Equipment failure	Equipment failure is likely to be a major hazard for most processes, because such failure could lead to a release. Equipment failure includes cracks, weld failures, disk failures, ruptures, pump/gauge/control system failures, etc.
11. Loss of cooling, heating, electricity, instrument air	These losses could be major hazards if they could lead to a release. For example, loss of cooling could lead to an increase in pressure and failure of a vessel or pipe, and a loss of heating or power could lead to unstable processes. These conditions are less likely to be major hazards for substances handled at atmospheric temperatures and pressures.
12. Earthquake	Report earthquakes as a major hazard only if there is a great enough risk of their occurring at your site that you plan and design for them.
13. Floods (Flood Plain)	Report floods as a major hazard only if there is a great enough risk of their occurring at your site that you plan and design for them.
14. Tornadoes	Report tornadoes as a major hazard only if there is a great enough risk of their occurring at your site that you plan and design for them.

7.4.d. Major Hazard	Description
15. Hurricanes	Report hurricanes as a major hazard only if there is a great enough risk of their occurring at your site that you plan and design for them.
16. Other	Specify any other major hazards not listed above.

7.4.e. Process controls in use (select at least one). All of the process controls used on the process or part of the process. Process controls are equipment and associated procedures used to prevent or limit releases and are described below. If none are applicable, check "none."

7.4.e. Process Controls	Description
1. Vents	An opening provided for the discharge of pressure or release of pressure from tanks, vessels, or processing equipment.
2. Relief valves	A valve that relieves pressure beyond a specified limit and recloses upon return to normal operating pressure.
3. Check valves	A device for automatically limiting the flow in a piping system to a single direction.
4. Scrubbers	A pre-release protection measure that uses water or aqueous mixtures containing scrubbing reagents to remove discharging liquids and may treat the discharging chemical.
5. Flares	A pre-release protection measure used to burn waste gases and vapors and discharge their combustion products into the atmosphere.
6. Manual shutoffs	Manual controls of the shutoff flow to a pipe or vessel.
7. Automatic shutoffs	Controls the shutoff flow to a pipe or vessel and are triggered automatically when process conditions are exceeded.
8. Interlocks	A switch or other device that prevents activation of a piece of equipment when a protective door is open or some other hazard exists.
9. Alarms and procedures	Systems that trigger a warning device after the occurrence of a hazardous condition and procedures to activate an alarm system.
10. Keyed bypass	A bypass system that is activated by a control signal.

7.4.e. Process Controls	Description
11. Emergency air supply	A backup system to provide air to a process when the regular air supply fails.
12. Emergency power	Backup power systems.
13. Backup pump	A secondary pump intended to serve the same function as the primary pump if the primary pump fails.
14. Grounding equipment and bonding	Devices that ground and bond electrical equipment to avoid explosions and to provide a good electrical path to the ground.
15. Inhibitor addition	A substance that is added to a reaction that is capable of stopping or retarding a chemical reaction.
16. Rupture disks	A device that relieves pressure beyond a specified limit.
17. Excess flow device	Flow-limiting equipment that protects downstream equipment from surges.
18. Quench system	A system that cools by removing excess heat or immersing liquid into a cooling medium.
19. Purge system	A system that replaces the atmosphere in a container with an inert substance to prevent the formations of an explosive mixture.
20. None	None are applicable.
21. Other	Specify any other process controls that you may use on your process and that are not specified above.

7.4.f. Mitigation systems in use (select at least one). All of the mitigation systems you have in place to control a release from the process or part of the process. Mitigation systems are described below. If none are applicable, check "none."

7.4.f. Mitigation Systems	Description
1. Sprinkler systems	A system for protecting a building against a fire by means of overhead pipes that release an extinguishing material through heat activated outlets.
2. Dikes	A low wall that acts as a barrier to prevent a spill from spreading.
3. Fire walls	A wall constructed to prevent the spread of fire.
4. Blast walls	A heavy wall used to isolate buildings or areas that contain highly combustible or explosive materials.
5. Deluge system	A system to overflow an area with a release of water or other extinguishing fluid.
6. Water curtain	A spray of water from a horizontal pipe through nozzles. The curtain may be activated manually or automatically.
7. Enclosure	Something that facilitates the physical containment of a release within a structure (e.g., a building).
8. Neutralization	Controlling a release by neutralizing the released chemical.
9. None	None are applicable.
10. Other	Specify any other mitigation systems you may have in place on your process and that are not listed above.

7.4.g. Monitoring/detection systems in use (select at least one). All of the monitoring and detection systems you have installed to detect a release of a regulated substance from the process or part of the process. Monitoring and detection systems are described below. If none are applicable, check "none."

7.4.g. Monitoring & Detection Systems	Description
1. Process area detectors	Detection systems located on or close to process equipment. Detection systems include indicator tubes, and chromatographic, spectrometric, electrochemical, and colorimetric gas analysis.

2. Perimeter monitors	Integrated detection networks at the source boundary. Detection systems can include fluorescent SO_2 analyzers, photoelectric tape sensors, or electrolytic chlorine detectors.
3. None	None are applicable.
4. Other	Specify any other monitoring and detection systems you have in place and that are not listed above.

7.4.h. Changes since last PHA or PHA update (select at least one). All of the changes made to the process or part of the process since the last PHA. If none are applicable, check "none."

7.4.h. Changes Since Last PHA or PHA Update	Description
1. Reduction in chemical inventory	A decrease in the quantity of regulated substances stored on-site.
2. Increase in chemical inventory	An increase in the quantity of regulated substances stored on-site.
3. Change in process parameters	Examples of changes in process parameters include an increase or decrease in temperature, pressure, flow rates, etc.
4. Installation of process controls	The addition of controls such as those described in 7.4.e.
5. Installation of process detection systems	The addition of systems such as those described in 7.4.g.
6. Installation of perimeter monitoring systems	The addition of systems such as those described in 7.4.g.
7. Installation of mitigation systems	The addition of systems such as those described in 7.4.f.
8. None recommended	Select “none” if the PHA team did not recommend any changes to the process.
9. None	None are applicable.
10. Other	Specify any other changes made to the process since the last PHA that are not listed above.

7.5. Date of most recent review or revision of operating procedures. The operating procedures requirements for Program 3 processes can be found at 40 CFR §68.69. For your first RMP submission, enter the date you complied with the requirement of §68.69(a) (develop and implement written procedures) for the process or the date you last reviewed or revised the operating procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the operating procedures. Operating procedures may be reviewed or revised as a result of, among other things, a change to the process (see §§68.69(c) and 68.75(e)), annual certification of the operating procedures (see 68.69(c)), or a periodic audit of the prevention program (see §68.79(a)).

7.6. Training. The training requirements for Program 3 processes can be found at 40 CFR §68.71.

7.6.a. Date of most recent review or revision of training programs. For your first RMP submission, enter the date you ensured that the training you provide the employees operating the process meets the requirements of §68.71(a), or the date you last reviewed or revised your training programs, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the training you provide. Training programs may be reviewed or revised as a result of, among other things, a change to the process (see § 68.75(c)) or a periodic audit of the prevention program (see §68.79(a)). If the training was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.6.b. Type of training provided (select at least one).

1. Classroom
2. On the job
3. Other (specify)

7.6.c. Type of competency testing used (select at least one). Identify how employees were tested to determine and evaluate comprehension of the training materials.

1. Written test
2. Oral test
3. Demonstration
4. Observation
5. Other (specify)

7.7. Maintenance. The maintenance requirements for Program 3 processes can be found at 40 CFR §68.73. Enter the following:

7.7.a. The date that you most recently reviewed or revised the maintenance procedures. For your first RMP submission, enter the date you complied with the

requirements of §68.73(b) (establish and implement written maintenance procedures) for the process, or the date you last reviewed or revised the maintenance procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the maintenance procedures. Maintenance procedures may be reviewed or revised as a result of, among other things, a change to the process (see § 68.75(c)) or a periodic audit of the prevention program (see §68.79(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.7.b. The date of the most recent equipment inspection or test

7.7.c. The equipment that was inspected or tested (list equipment).

7.8. Management of change. The management of change requirements for Program 3 processes can be found at 40 CFR §68.75. Enter the following:

7.8.a. The date of the most recent change (if any) that triggered the management of change procedure.

7.8.b. The date that you most recently reviewed or revised the management of change procedures at your site. For your first RMP submission, enter the date you complied with the requirements of 68.75(a) (establish and implement written procedures) for the process, or the date you last reviewed or revised the management of change procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the procedures. Management of change procedures may be reviewed or revised as a result of, among other things, a periodic audit of the prevention program (see §68.79(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.9. Date of most recent pre-startup review. The pre-startup review requirements for Program 3 processes can be found at 40 CFR §68.77. Enter the date of the most recent pre-startup review (if any) for this process.

7.10. Compliance audits. The compliance audit requirements for Program 3 processes can be found at 40 CFR §68.79. If you did not conduct a compliance audit prior to submitting your first RMP (you are not required to do so), leave these fields blank.

7.10.a. Date of most recent compliance audit
7.10.b. Expected or actual date of completion of all changes resulting from the compliance audit. This may be left blank if there were no changes.

7.11. Incident investigation. The incident investigation requirements for Program 3 processes can be found at 40 CFR §68.81. Enter the following:

7.11.a. Date of your most recent incident investigation (if any). If you have not had an incident investigation, leave this field blank.

7.11.b. The expected or actual date of completion of all changes resulting from the incident investigation. This may be blank if there were no changes.

7.12. Date of most recent review or revision of employee participation plans. The employee participation requirements for Program 3 processes can be found at 40 CFR §68.83. For your first RMP submission, enter the date you complied with the requirements of §68.83(a) (develop a written plan) for the process, or the date you last reviewed or revised the employee participation plans, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the plan. Employee participation plans may be reviewed or revised as a result of, among other things, a periodic audit of the prevention program (see §68.79(a)). If the plan was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.13. Date of most recent review or revision of hot work permit procedures. The hot work permit requirements for Program 3 processes can be found at 40 CFR §68.85. For your first RMP submission, enter the date you complied with the requirement of §68.85 for the process or the date you last reviewed or revised the hot work permit procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of your hot work permit procedures. Hot work permit procedures may be reviewed or revised as a result of, among other things, a periodic audit of the prevention program (see §68.79(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.14. Date of most recent review or revision of contractor safety procedures. The contractor safety requirements for Program 3 processes can be found at 40 CFR §68.87. Leave this field blank if you do not have any contractors. Otherwise, for your first RMP submission, enter the date you complied with the requirements of §68.87(b)(4) (develop and implement safe work practices for contractors) for the process, or the date you last reviewed or revised the contractor safety procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the procedures. Contractor safety procedures may be reviewed or revised as a result of, among other things, a change to the process (see §68.75(c)) or a periodic audit of the prevention program (see §68.79(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.15. Date of most recent evaluation of contractor safety performance. Leave this field blank if you do not have any contractors or have not yet evaluated contractor performance.

Otherwise, enter the date of your most recent evaluation of contractor safety performance. If you have more than one contractor involved in operating or maintaining the process, enter the date you completed your evaluations of all the contractors.

Section 8: Prevention Program for Program 2 Processes

Complete this section for each prevention program you report for a Program 2 process.

Prevention program description. If different safeguards apply to different units in your process, use this field to explain how the prevention program for the process relates to the different units in the process. For example, "This process includes three interconnected production units, A, B, and C. Everything in this prevention program applies to all three units, with the following exceptions:
- The dates of the hazard review, which are 01/02/97, 6/5/96 and 4/3/96 for units A, B and C, respectively.
- Production unit A uses only a scrubber as a process control, while units B and C have relief valves and scrubbers.
- The water curtain indicated as a mitigation measure applies only to production unit C."

If you have so many "exceptions" that it gets too complicated to explain as above, but you still have many common data elements, you can report your prevention program on a unit-by-unit basis. To simplify such reporting, you can use the autocopy feature in RMP*Submit so that you only have to enter the common data elements once. First, enter the common elements into RMP*Submit (or the paper form, if you are submitting in paper), then hit the COPY function at the bottom of the screen to copy that information to another prevention program "record" (if you are submitting in paper, photocopy the pages). To complete the prevention program record for each unit, enter the remaining data which is unique to each.

8.1. NAICS code for the process. Enter the NAICS code that most closely corresponds to the process; it will not necessarily be the same NAICS code for your facility as a whole. The NAICS code that you choose must be one that you've already entered in the Registration Section for the covered process. If you have two processes with the same NAICS code, explain in the above description field which of the two processes this prevention program relates to. RMP*Submit will produce a list of the NAICS codes that you have already entered for your registered processes as a pick list for this data element. As described in the *Registration* section of this manual, the NAICS code system classifies businesses by type using descriptive categories that correspond to five-digit or six-digit codes.

8.2. Chemical name(s). For each prevention program, provide the names of all regulated substances held above the threshold in the covered units. If you have an NFPA-4 flammable mixture containing regulated flammables, you may list it as a “flammable mixture” and list all of the regulated substances contained in the mixture.

8.3. Safety information. The safety information requirements for Program 2 processes can be found at 40 CFR §68.48. Enter the following:

8.3.a. The date that you most recently reviewed or revised the safety information. For your first RMP submission, enter the date you complied with the safety information requirements of

§68.48(a) (compile safety information) for the process, or the date you last reviewed or revised the safety information, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date the information was most recently reviewed or revised. Safety information may be reviewed or revised as a result of, among other things, a major change to the process (see §68.48(c)) or a periodic audit of the prevention program (see §68.58(a)). If the safety information was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

8.3.b. Federal or state regulations or industry-specific design codes and standards used to demonstrate compliance with the safety information requirement (select at least one). Are you subject to any of the following Federal or state regulations? Do you use any of the following industry-specific design codes and standards to demonstrate compliance with the safety information requirement? If none are applicable, check "none."

8.3.b.1. NFPA 58 (or state law based on NFPA 58). – NFPA stands for National Fire Protection Association; NFPA 58 is a propane (LP gas) handling code. Note that state propane laws are generally based on NFPA 58. Select "NFPA 58" if your process is subject to a state or local law based on NFPA 58 or if you follow NFPA 58 in any event.

8.3.b.2. OSHA (29 CFR 1910.111) – OSHA's rule for operations handling anhydrous ammonia. Select "29 CFR 1910.111" if your process is subject to this rule.

8.3.b.3. ASTM Standards – Select this if you follow American Society of Testing Materials standards. ASTM establishes standards for materials, products, systems, test methods, specifications, classifications, definitions, and recommended practices.

8.3.b.4. ANSI Standards – Select this if you follow American National Standards Institute standards. ANSI nationally coordinates voluntary standards. ANSI standards cover areas as definitions, terminology, symbols, and abbreviations; materials, performance characteristics, procedure, and methods of rating; methods of testing and analysis; size, weight, and volume, safety, health, and building construction.

8.3.b.5. ASME Standards - Select this if you follow American Society of Mechanical Engineers standards. ASME conducts research and develops boiler, pressure vessel, and power test codes. It also develops safety codes and standards for equipment.

8.3.b.6. None – If your facility does not apply to the Program 2 process any national standards such as those noted above, and is not subject to any federal or state rules or laws such as those noted above, select "none."

8.3.b.7. Other (specify) – If you apply any other standards to your process safety equipment, select "other" and specify the standards you apply. Some examples of other standards include the National Electrical Manufacturers Association (NEMA) standards

and the American Petroleum Institute (API) standards. There may also be other codes that apply.

8.3.b.8. Comments – In this section, please explain how federal, state or local regulations or industry-specific design codes and standards are being used to demonstrate compliance with the safety information requirement.

8.4. Hazard Review. The hazard review requirements for Program 2 processes can be found at 40 CFR §68.50. Enter the following:

8.4.a. The date of completion of the most recent hazard review or update (must be within the five years prior to submission of the RMP).

8.4.b. The expected or actual date of completion of all changes resulting from the hazard review. This may be blank if there were no changes.

8.4.c. Major hazards identified (select at least one). All major hazards that were identified for the Program 2 process or part of the process at your facility as a result of the hazard review. Major hazards are described in 7.4.d.

8.4.d. Process controls in use (select at least one). All of the process controls used on the Program 2 process or part of the process. Process controls are equipment and procedures used to prevent or limit releases. Process controls are described in 7.4.e. If none are applicable, check "none."

8.4.e. Mitigation systems in use (select at least one). All of the mitigation systems you have in place to control a release should one occur from the Program 2 process or part of the process. Mitigation systems are described in 7.4.f. If none are applicable, check "none."

8.4.f. Monitoring/detection systems in use (select at least one). All of the monitoring and detection systems installed to detect a release of a regulated substance from the Program 2 process or part of the process. Monitoring and detection systems are described in 7.4.g. If none are applicable, check "none."

8.4.g. Changes since last hazard review or hazard review update (select at least one). All of the changes made to the process or part of the Program 2 process since the last hazard review. Hazard review changes are described in 7.4.h. If none are applicable, check "none."

8.5. Date of most recent review or revision of operating procedures. The operating procedures requirements for Program 2 processes can be found in the RMP regulation at 40 CFR §68.52. For your first RMP submission, enter the date you complied with the requirements of §68.52(a) (prepare written procedures) for the process, or the date you last reviewed or revised

the operating procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the operating procedures. Operating procedures may be reviewed or revised as a result of, among other things, a major change to the process (see §68.52(c)) or a periodic audit of the prevention program (see §68.58(a)). (See Chapter 7 of the *General Guidance for Risk Management Programs* for a discussion of what constitutes a major change.) If the operating procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

8.6. Training. Training requirements for Program 2 processes can be found at 40 CFR §68.54. Enter the following:

8.6.a. Date of most recent review or revision of training programs. For your first RMP submission, enter the date you complied with the requirements of §68.54(a) (training) for the process, or the date you last reviewed or revised the training programs, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the training you provide. Training programs may be reviewed or revised as a result of, among other things, a major change to the process (see § 68.54(d)) or a periodic audit of the prevention program (see §68.58(a)). If the training was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

8.6.b. Type of training provided (select at least one).

1. Classroom
2. On the job
3. Other (specify)

8.6.c. Type of competency testing used (select at least one). Identify how employees were tested to determine and evaluate comprehension of the training materials.

1. Written test
2. Oral test
3. Demonstration
4. Observation
5. Other (specify)

8.7. Maintenance. The maintenance requirements for Program 2 processes can be found at 40 CFR §68.56. Enter the following:

8.7.a. The date that you most recently reviewed or revised the maintenance procedures. For your first RMP submission, enter the date you complied with the requirements of §68.56(a) (prepare and implement maintenance procedures) for the

process, or the date you last reviewed or revised the maintenance procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the maintenance procedures. Maintenance procedures may be reviewed or revised as a result of, among other things, a major change to the process (see §68.56(a)) or a periodic audit of the prevention program (see §68.58(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

8.7.b. The date of the most recent equipment inspection or test

8.7.c. The equipment that were inspected or tested (list equipment).

8.8. Compliance Audits. The compliance audit requirements for Program 2 processes can be 40 CFR §68.58. If you did conduct a compliance audit prior to submitting your first RMP (you are not required to do so), leave these fields blank.

8.8.a. The date of your most recent compliance audit.

8.8.b. The expected or actual date of completion of all changes resulting from the compliance audit. This may be blank if there were no changes.

8.9. Incident Investigation. The incident investigation requirements for Program 2 processes can be found at 40 CFR §68.60. Enter the following:

8.9.a. The date of your most recent incident investigation (if any). If you have not had an incident investigation, leave this field blank.

8.9.b. The expected or actual date of completion of all changes resulting from the incident investigation. This may be blank if there were no changes.

8.10. Date of most recent change that triggered review or revision. Enter the date of the most recent change that triggered a review or a revision of safety information, the hazard review, operating or maintenance procedures, or training.

Section 9: Emergency Response Program

Complete this section once for all covered processes.

The extent to which you need to fill out this portion of the RMP depends on whether your employees will respond to releases of regulated substances at your facility. Under §68.90(b), if your employees will *not* respond to releases, you are *not* required to comply with the requirements for an emergency response program *provided* you meet the following criteria: (1) if you hold one or more regulated toxic substances over threshold quantities, your facility must be included in the community emergency response plan developed under the Emergency Planning and Community Right-to-Know Act (EPCRA); (2) if you hold *only* one or more regulated flammable substances over threshold quantities, you must have coordinated response actions with the local fire department; and (3) you must have appropriate mechanisms in place to notify emergency responders when there is a need for a response.

If your employees will respond to releases of regulated substances at your facility, you are subject to §68.95 and must fill out all the data items in this section of the RMP. If your employees will *not* respond to releases of regulated substances at your facility, you need only respond to the first two (9.1.a & 9.1.b) and last three (9.7.a, 9.7.b, & 9.8) emergency response data elements.

9.1. Written emergency response (ER) plan

9.1.a. Is your facility included in the community emergency response plan? If your facility is subject to part 68 because it has one or more regulated toxic substances above threshold quantities, it is probably included in a local emergency response plan under the Emergency Planning and Community Right-to-Know Act (EPCRA). Under §303 of EPCRA, local emergency planning committees (LEPCs) must prepare an emergency response plan for facilities in their planning district having toxic substances listed under EPCRA §302 in excess of the threshold planning quantity established under that section. Most of the toxic substances listed in part 68 are also listed under EPCRA §302, and the EPCRA thresholds for those substances are generally the same or lower than the part 68 thresholds for the same substances. Consequently, part 68 facilities with toxic substances listed under both EPCRA and part 68 should be included in community emergency response plans.

In addition, facilities subject to part 68 as a result of flammable substances may also be covered by community emergency response plans, since LEPCs can, and sometimes do, include other hazardous substances, including flammables, in their plans. If you are not sure whether your facility is included in your community's local emergency plan, check with your LEPC.

As noted above, if your employees are *not* going to respond to releases of regulated substances at your facility and you have one or more part 68 regulated toxic substances over threshold quantities, your facility must be included in the local emergency response place under EPCRA.

Check this question if your facility is included in the community's emergency response plan.

9.1.b. Does your facility have its own written emergency response plan? Check this question if you have a response plan (not just an emergency action plan as required by OSHA under 29 CFR 1910.38).

9.2. Does your facility's ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?

9.3. Does your facility's ER plan include procedures for informing the public and local agencies responding to accidental releases?

9.4. Does your facility's ER plan include information on emergency health care?
These data elements (9.2, 9.3, 9.4) reflect the three mandatory components of the emergency response plan required under §68.95(a)(1). For an emergency response plan to be in compliance with this requirement, you must be able to answer "yes" to each of these questions.

9.5. Date of most recent review or update of your facility's ER plan.
Indicate the date on which you most recently reviewed or updated your plan. Section 68.95(a)(4) requires that ER plans be reviewed and updated "as appropriate" to reflect changes at the facility and to ensure that employees are informed of changes.

9.6. Date of the most recent ER training for your facility's employees.
Indicate the date of the most recent emergency response training at your facility. Emergency response training includes drills involving your personnel with or without outside emergency response agencies and tabletop exercises of your emergency response plan. Single purpose drills (e.g., alarm system drills) may be listed, but exercises that test more aspects of the plan are preferable.

Part 68 does not specify a schedule for conducting employee response training. You should note, however, that other planning requirements (e.g., HAZWOPER) may establish a more formal schedule for conducting training (e.g., eight hours of annual refresher training).

9.7.a-b. Local agency with which your facility's ER plan or response actions are coordinated. If you have an ER plan, indicate the name and phone number of the agency with whom you have coordinated your plan. Section 68.95(c) requires that a facility's ER plan be coordinated with the community emergency response plan under EPCRA for the facility's community. The LEPC for the facility's community will typically be the agency with which ER plans are coordinated.

If you do not have an ER plan, indicate the agency with which you have coordinated response activities. As noted above, §68.90(b) provides that if you have regulated toxic substances and your employees will *not* be responding to releases of those substances, your facility must be included in the community emergency response plan developed by the LEPC for your

community. If that is the case for your facility, indicate the name and phone number of your LEPC here. If you have only regulated flammable substances and your employees will *not* be responding to releases of those substances, you must have coordinated response actions with the local fire department. If that is case for your facility, indicate the name and phone number of your local fire department here.

9.8. What other Federal or State emergency plan requirements is the facility subject to? Indicate all of the federal and state emergency response regulations or statutes to which your facility is subject. Select at least one. All RMP facilities are subject to OSHA emergency planning requirements at either 29 CFR 1910.38 or 29 CFR 1910.120.

a. OSHA Regulations at 29 CFR 1910.38. These are OSHA's Emergency Action Plan regulations. All RMP facilities are subject to either these OSHA regulations or OSHA regulations at 29 CFR 1910.120.

b. OSHA Regulations at 29 CFR 1910.120. These are OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) Plan regulations. All RMP facilities are subject to either these OSHA regulations or OSHA regulations at 29 CFR 1910.38.

c. Clean Water Act Regulations at 40 CFR 112. These are EPA's Oil Spill Prevention Control and Countermeasures (SPCC) regulations under the Clean Water Act.

d. RCRA Regulations at 40 CFR 264, 265, and 279.52. These are EPA's permitting regulations for solid waste under the Resource Conservation and Recovery Act (RCRA).

e. OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254. These are EPA, U.S. Coast Guard, Department of Transportation, and Department of the Interior facility response plan regulations under the Oil Pollution Act of 1990 (OPA 90).

f. State EPCRA Rules or Laws. These are state emergency planning and community right-to-know (EPCRA) laws. Federal EPCRA does not require facility response plans, but some state laws may.

g. Other. Specify any other emergency response regulations or laws to which your facility is subject.

Executive Summary

The executive summary must include a brief description of your facility's risk management program. You determine the length; it may be as short as two or three pages or, if you have many processes, it may need to be more lengthy. You should view the Executive Summary as an opportunity to communicate in your own words the nature of the risks posed by your facility to your community and to explain what you have done to minimize those risks. The summary can be an excellent vehicle to display the effort and resources your facility has put into its accident prevention program.

Your executive summary can not be claimed as CBI. Do not include any CBI data in your executive summary.

If your executive summary is short, it can be "cut" from the word processing program you are using and "pasted" into the text box on the Executive Summary screen. Alternatively, you may type the executive summary straight into the text box. To expand the visual size of the text box, press [shift-F2].

To report long executive summaries, you have 2 options:

1) **Attach your entire executive summary in a separate ASCII file:** While you are using your word processing program, save the executive summary as an ASCII Text file (most word processing program allow you to do this). Then, in RMP*Submit's Executive Summary screen, click on the box with the 3 dots (...) at the bottom of the screen to "browse" your system and locate the ASCII Text file. Select the ASCII Text file containing your executive summary, and RMP*Submit will store that filename. When you are ready to submit your RMP, choose "Create Submission File" from the "List of Risk Management Plans" screen, and the executive summary file will be automatically stored on the submittal disk along with the rest of the RMP.

2) **Cut and paste part of the executive summary and attach the rest:** Enter part of your executive summary into the text box on the Executive Summary page in RMP*Submit by either cutting and pasting text or typing it in. Then, attach the rest of the executive summary in a separate ASCII Text file using the instructions in #1 above.

IMPORTANT - A summary of the off-site consequence analysis (OCA) for the worst-case and alternative release scenario(s) is no longer required to be included in the executive summary. While the RMP rule originally required that the executive summary briefly describe the OCA for worst-case and alternative release scenario(s), EPA amended the RMP rule in 2004 to remove this requirement because of security concerns.

The Executive Summary must briefly describe the following elements:

The accidental release prevention and emergency response policies at your facility
Describe your facility's overall approach to chemical safety. You may want to include any corporate policies (if applicable) and an overview of senior management commitment to safety and implementation of safe procedures.

Your facility and the regulated substances handled
Provide a description of your facility so that the public has a clear picture of the facility, its processes, and products. Describe the primary activities at the facility (e.g., manufacturer of polyethylene, pulp mill, etc.) and the regulated substances used. In addition, you may want to mention the quantities of these substances handled or stored at your facility.

The general accidental release prevention program and chemical-specific prevention steps
You may wish to mention the rules and regulations with which your facility complies, such as the OSHA PSM rule. You should also highlight practices that you believe are important to your prevention program. The steps you list may be either technological (e.g., backup systems) or procedural/managerial (e.g., improved maintenance or training).

The five-year accident history
Do not present accident history information in table form here; more details will be provided in the data elements. This should be a written summary; for example, "We have had five accidental releases of chlorine in the past five years; the largest release was 1,500 pounds. No one offsite was injured, but several houses were evacuated as a precautionary measure during the October 1995 and May 1996 releases."

The emergency response program
Briefly describe the elements of your response program such as coordination with local emergency responders, training received by personnel, drills conducted by your facility, public notification and alert systems, as appropriate.

Planned changes to improve safety
List any upcoming events such as training, installation of new mitigation or control equipment or technology, organizational changes, etc., that will improve safety at your facility.

CHAPTER 3 HOW TO ASSEMBLE AND SUBMIT YOUR RMP

A complete RMP submission package includes at least two items:

1. The RMP in ASCII format, created by using either RMP*Submit or a commercial RMP software product, on a diskette or CD. If you do not have the capability to submit electronically, see the section on "Paper Submission" below. Include only 1 RMP on each diskette/CD or form.

2. A certification statement for the entire RMP, signed (with an original signature) and dated.

Submit only one RMP and accompanying certification statement per envelope to ensure that the certification statement is applied to the appropriate RMP. If you are claiming CBI, additional items are required ; see *Chapter 4: Submitting CBI & Trade Secrets* of this manual for more information. Do not send other correspondence with your RMP.

Completeness Check

One advantage of submitting electronically (using RMP*Submit or a commercial RMP software package) is that you will be able to check whether your RMP is "complete" in the sense that you have provided information for the RMP data elements that every facility must complete.

Using RMP*Submit, you can run the **Check** function (from the List of Risk Management Plans screen) to verify the "completeness" of your RMP at any time. Once you have completed entering your RMP data, you should execute the **Check** function to check for errors. The **Check** function is a button on the List of Risk Management Plans screen (See Exhibit 3). The Check function is also executed automatically each time you execute the **Create Submission File** function.

The **CHECK** function will create an Error Report if your RMP is "incomplete." It is important to note, however, that the "completeness" check provided by RMP*Submit is *not* a compliance check. It will not indicate whether your RMP meets all applicable part 68 requirements; it will only indicate that you have provided the right type of information for those data elements that every facility submitting an RMP must at a minimum complete. RMP*Submit cannot discern if you have provided correct information or if you should have completed data elements in addition to those required of every facility. Consequently, you should not rely on RMP*Submit's "completeness" check to determine whether your RMP fully complies with the requirements of part 68.

If you used a commercial RMP software program, you can still use RMP*Submit to verify the "completeness" of your RMP. RMP*Submit can import an RMP ASCII file. Once a new ASCII file is imported, run the **CHECK** function to verify "completeness."

RMP*Submit will produce an Error Report if it detects that the RMP is not "complete" or if it detects any of the following errors:

1) You have omitted critical and mandatory data elements such as:
--Facility name and address;
--For each process (section 1): program level, chemical name, CAS # and NAICS code;
--For each OCA section (sections 2-5): chemical name;
--For each Accident History (section 6): chemical name, CAS #, & date;
--For each Prevention Program (sections 7-8): NAICS, chemical name, CAS #.

2) You have entered data elements which do not meet specific "validation" criteria. All data elements required for an RMP to be "complete" must contain a response that is appropriate for the kind of information requested or RMP*Submit will generate an Error Report. For example, all date fields must contain a 2-digit month between 01 and 12, a 2-digit day between 01 and 31, and a 4-digit year (MM/DD/YYYY). RMP*Submit will *not* indicate whether the date or other information provided is correct or meets regulatory requirements.

3) You have entered data elements which are inconsistent across sections of the RMP. For example, for every toxic chemical reported in the registration section for Program 2 and 3 processes, there must be a toxic alternative release scenario reported.

Errors in #1 above make your RMP submission unprocessable and RMP*Submit cannot generate an ASCII file. Errors generated in #2 & #3 above will still generate the ASCII file for submission. Therefore, you can choose to submit an RMP that is "incomplete," meaning it contains errors. However, if you submit an "incomplete" RMP, you will not be in compliance with the part 68 requirement to submit a RMP meeting all applicable regulatory requirements by the applicable due date.

Creating the RMP Submission File on Diskette

When you are ready to submit your RMP, run the **Create Submission File** function (from the RMP List screen) to create an ASCII file for submission. RMP*Submit will once again run the validation program to check for "completeness."

Graphics Files

In Sections 2 through 5, you may have included a graphics file name. If so, remember that you must take the extra step of copying the file to the diskette or CD that contains your RMP submission ASCII file, or an additional diskette or CD that contains just your graphics file. Make sure the file name in the scenario and the actual name of the file match exactly. Make sure they are identified in the RMP with a specific worst case or alternative release scenario.

How to Label Your Submission Diskette

You must attach a label to each diskette (not the diskette's jacket). The label must be typed or legibly handwritten. A sample label with the necessary information is shown below. While the types of packaging and shipping to use for submitting diskettes are left to your discretion, be sure to package them in a way to avoid damage. Damaged diskettes or CDs are unprocessable.

RMP	
Facility Name	
Date: 6/1/1999	Disk 1 of 1
Contact: RMP Contact Name & Phone Number	

Certification Letter

A certification letter is required for all RMP submissions.

> ***68.185 Certification.***
>
> *(a) For Program 1 processes, the owner or operator shall submit in the RMP the certification statement provided in § 68.12(b)(4) of this part.*
>
> *(b) For all other covered processes, the owner or operator shall submit in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete.*

The certification statement submitted must bear the original signature of the person making the certification. Photocopied, faxed or otherwise duplicated signatures are not originals. Be sure to include the signed copy with your RMP submission.

The certification statement must be signed by the person at the facility responsible for the Risk Management Program (the owner or operator or a senior official with management responsibility for the person (or persons) completing the RMP). The owner, operator, or official must certify the accuracy and completeness of the RMP by signing and dating the certification statement. The statement applies to all the information supplied in the RMP and should be signed only after the form is complete. The name and title of the person signing the statement should be printed or typed on the certification.

Sample certification letters are provided in Appendix C. In addition, RMP*Submit contains the text of the sample letters under the "Main Menu," –> "Tools," –> "Edit Certification Letters." You can cut and paste this text into your own word processing package to finalize and print the letter

Unprocessable and Incomplete RMPs

The Reporting Center will process all RMPs using the same **Check** function found in RMP*Submit. If any of the fields needed for ASCII file generation are missing (error in #1 above), the Center will be unable to process your RMP and you will be so notified. If any other errors (like those in #2 & #3 above) are detected, an Error Report will be generated and the RMP will be marked as "incomplete." Both "complete" and "incomplete" RMPs will be included in the RMP database. Error reports for those that are incomplete, as well as a list of RMPs that cannot be processed, will also be included. The RMP database is temporarily unavailable on the Internet, but information from it is available to the public on request. A copy of any Error Report generated for your RMP will be mailed to you with your notification letter.

In addition to missing required fields (an error in #1 above), an RMP submitted on diskette will be unable to be processed for the following reasons:

--There is a virus on the diskette you submitted that could not be removed at our Reporting Center.

--The submitted diskette, or the ASCII file on the diskette you submitted, is unreadable (for example, damaged diskette).

--More than one Risk Management Plan was reported in a single submission.

In addition to inconsistencies in data elements (an error in #2 or #3 above), an RMP will be considered incomplete if you do not include a certification letter with your submission or the signature on the certification letter is not an original.

<u>Attention:</u> If you consider any of the information you are required to report to be confidential business information (CBI), please read the following:

Before you submit your RMP, review the regulatory provisions (40 CFR §2.208) governing CBI claims and decide if the information you consider confidential meets the applicable criteria for CBI. See Chapter 4 for instructions on how to claim CBI.

DO NOT include the information you believe meets the criteria for CBI in your RMP (regardless of whether you use RMP*Submit or the paper RMP form). Because the Clean Air Act requires that RMPs be available to the public, any information you include in your RMP CANNOT be claimed CBI in the future.

Paper Submissions - Forms and Instructions

If you are unable to submit your RMP on diskette, use the paper form provided in Appendix A. Our Reporting Center can only process paper RMPs submitted using that form. If you submit on paper, you are asked to complete the Paper Submission Form (Appendix B) and send it with your RMP.

<u>Attention:</u> If you consider any of the information you are required to report to be confidential business information (CBI), please read the following:

Before you submit your RMP, review the regulatory provisions (40 CFR §2.208) governing CBI claims and decide if the information you consider confidential meets the applicable criteria for CBI.

DO NOT include the information you believe meets the criteria for CBI in your RMP (regardless of whether you use RMP*Submit or the paper RMP form). Because the Clean Air Act requires RMPs to be available to the public, any information you include in your RMP CANNOT be claimed CBI in the future.

At the same time you submit your RMP, you must submit ON SEPARATE PAPER FORMS the information that you are claiming CBI and your substantiation that the information meets the criteria for CBI.

Refer to Chapter 4 of the User's Manual for complete instructions on how to submit CBI.

Where to send completed RMP Reports

Send reports by regular mail to:

Risk Management Plan (RMP) Reporting Center
P.O. Box 1515
Lanham-Seabrook, Maryland 20703-1515
(301) 429 5018

Send certified mail, overnight mail, and hand-delivered submissions **only** to:

Risk Management Plan (RMP) Reporting Center
c/o CSC
Suite 300
8400 Corporate Drive
New Carrollton, MD 20785
(301) 429 5018

Record Keeping

You are required to maintain records that support what is reported in your RMP and your implementation of the Risk Management Program for five years (40 CFR §68.200).

CHAPTER 4 SUBMITTING CBI AND TRADE SECRETS

On January 6, 1999, EPA published a final rule in the Federal Register specifying which RMP data elements may not be claimed as confidential business information (CBI) or trade secret and what procedures must be followed to claim information as CBI. The regulatory provisions, at sections 68.151 and 68.152, provide that if you claim any RMP information as CBI, you must submit to EPA a sanitized RMP (either on diskette or paper), a Substantiation Form (for explaining why you believe the information meets the criteria for CBI), and an Unsanitized Data Elements Form (on paper only) (see Appendices D & E for forms). **The sanitized, or redacted, RMP should not include any CBI.** Any CBI included in a sanitized RMP (either in diskette or paper form) will be automatically loaded into RMP*Info and will be available to the public. Report any information claimed as CBI only on the Unsanitized Data Elements Form. The Unsanitized Data Elements Form is only for those data elements that you are claiming as CBI, not for the entire RMP.

For a data element that requires you to report information that you believe meets the applicable criteria for CBI , you may claim the information as CBI in one of the following ways:

> **If you are submitting on diskette** - Check the CBI box at the top of the screen where that data element appears and leave the field blank.
>
> **If you are submitting on the RMP Paper Form** - Write "CBI" in the space provided for that data element on the sanitized RMP.

However, if you are claiming **chemical name** as CBI, you must report one of the following generic chemical categories. These will appear in the chemical pick lists in RMP*Submit once you check the CBI box at the top of the screen.

CBI Acids
CBI Amines, Ammonia, and Hydrazines
CBI Arsenic and Phosphorus Compounds
CBI Boron Compounds
CBI Carbonyl Compounds
CBI Cyanides and Nitriles
CBI Esters, Alcohols, Aldehydes, and Furans
CBI Halogenated Organic Compounds
CBI Halogens and Halogen Oxides
CBI Isocyanates and Isothiocyanates
CBI Nitrogen Oxides and Organic Nitro Compounds
CBI Organic Silanes
CBI Oxiranes and Azirdines
CBI Selenium and Sulfer Compounds
CBI Flammable Substance

In summary, a complete RMP package with a CBI claim must include #1, #2, #4 & #5, and possibly #3:

1. A sanitized, complete RMP in which the data elements claimed CBI are left blank except for an indication that the information has been claimed as CBI (e.g., for RMPs on diskette, the "CBI" box has been checked). This should be submitted on diskette or on the paper RMP form. This version of the RMP will be in RMP*Info, the publicly accessible database.

2. Sanitized CBI Substantiation Form(s) (Appendix D). If your explanation of why information is CBI entails providing other information you believe is CBI, you must complete two versions of the CBI Substantiation Form -- a sanitized version and an unsanitized version. The sanitized version should omit the information you claim is confidential and leave in its place the notation "information claimed confidential." The sanitized form should be submitted on paper only. If you are claiming multiple data elements as CBI, you may need multiple substantiation forms. All pages of all forms must be stapled together. Sanitized Substantiation Forms will be available to the public on request.

3. Unsanitized CBI Substantiation Form(s) (Appendix D). If your substantiation includes CBI, you must also include an unsanitized version of a completed CBI Substantiation Form that provides the information that you claim is CBI. This should be submitted on paper only. If you are claiming multiple data elements, you will need multiple substantiation forms. All pages of all forms must be stapled together.

4. An Unsanitized CBI Data Elements Form (Appendix E) that provides the RMP information that you claim is CBI. This should be submitted on paper only. Staple all pages together.

5. Certification Letter - signed and dated.

An RMP submission that claims CBI and does not contain the proper forms, will be considered "incomplete."

CHAPTER 5 WHAT TO EXPECT AFTER YOU SUBMIT

Once your RMP is processed, you will be notified regarding the submission status of your RMP. Notification can be expected within several weeks, although delays may occur during peak submission times. The notification will contain the following information:

(1) Your EPA Facility Identification Number.

A unique EPA Facility Identification Number (also referred to as the RMP Identification Number) is assigned to a facility upon its first submission and always stays with a facility, even when ownership changes. If this is your initial RMP submission, this notification provides you this number. Save the number. You will need it for all subsequent RMP submissions, corrections, and correspondence specific to that facility.

(2) Complete/Incomplete Status of your submitted RMP.

Once your RMP is received at the RMP Reporting Center, it will be screened for the kind of errors described previously. If any such errors are found, you will receive an Error Report. Please note that this Error Report will also be included with your RMP in RMP*Info[1]. Refer to *Chapter 6: Corrections to your RMP*, for instructions on how to correct any errors you may have.

(3) The postmark date of your RMP.

You must update your RMP at least every five years. As a general rule, the five-year anniversary for updating the RMP is calculated based on the postmark date of your last RMP submission. Since you may not know the exact postmark date, we will provide it to you for your records. For RMPs filed *before* the initial due date of June 21, 1999, the first five-year anniversary is June 21, 2004. Note that 40 CRF §68.190(b) requires you to update your RMP under several different circumstances, some or all of which could occur before the fifth anniversary of your last RMP submission.

(4) If you submitted on paper, we will send you a paper copy of the printout of your RMP.

Paper submittals will be entered into RMP*Info manually by data entry staff. You will receive a print out of your RMP as it appears in RMP*Info.

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[1]* RMP*Info, the publicly accessible database of RMPs previously available on the Internet, is temporarily unavailable. However, information from RMP*Info is available to the public on request.

Chapter 6 Corrections to Your RMP

EPA has established a "correction" procedure for making changes to your RMP that reflect administrative or other minor changes at your facility that do not require an update of your entire RMP. This procedure can be used to make corrections you are required to make to your RMP (e.g., change in emergency contact information) as well as corrections that you may choose to make (change in facility email address). Submitting a corrected RMP does not change the five-year anniversary date for updating your entire RMP.

When to Correct Your RMP

You must correct your RMP if the changes specified in §68.195 (see box below) occur. (Note: "stationary source" is the term used by the regulations to refer to a facility).

68.195 Required Corrections

The owner or operator of a stationary source for which a RMP was submitted shall correct the RMP as follows:

(1) New accident history information – For any accidental release meeting the five-year accident history reporting criteria of §68.42 and occurring after [insert publication date of rule], the owner or operator shall submit the data required under §68.168, §68.170(j), and §68.175(l) with respect to that accident within six months of the release or by the time the RMP is updated under §68.190, whichever is earlier.

(2) Emergency contact information – Beginning June 21, 2004, within one month of any change in the emergency contact information required under §68.160 (b)(6), the owner or operator. shall submit a correction of that information.

Additionally, if you receive a notification from the RMP Reporting Center that informs you that your RMP is "incomplete," provide the needed information as soon as possible using the corrections procedure. You may also discover other errors on your own, may need to make a change to reflect a change in ownership of the facility, or may need to make minor administrative changes such as provide a new phone number or contact name. You can correct your RMP to implement such administrative changes. You may also correct your RMP to remove OCA data from your Executive Summary.

How To Correct Your RMP

The process for making corrections or administrative changes to an electronically submitted RMP requires that you change the original RMP as needed and submit the corrected RMP on diskette or CD with an accompanying paper certification.

Note: EPA is developing a new tool that will allow facilities to make certain corrections and other small changes to the administrative sections of the RMP on-line, eliminating the need to mail diskettes and certification letters for such corrections. The internet-based tool for correcting the administrative sections of the RMPs on-line (known as RMP Web Registration Correction) will be available in May 2004. Further information about this tool will be on EPA's website at www.epa.gov/emergencies.

If you submitted an RMP on paper, make the changes in red ink on the printout of your RMP submission (which the Reporting Center will mail back to you with your notification letter). You must also submit a new certification letter for these corrections. A sample certification letter for corrections/updates can be found in Appendix C.

Correction for New Accident History Information

If you have a reportable accident, you must revise section 6 of your RMP to include information about the accident within six months of the accident's occurrence. If the accident involved a Program 2 or 3 process, you must also revise the incident investigation information for that process in the RMPs, reported as part of Prevention Program Information, section 7 or 8 of the RMP. Specifically, in section 7 or 8, you must revise: (1) the date of investigation (40 CFR 68.170(j)); and (2) the expected date of completion of any changes due to that accident investigation (40 CFR 68.175(l)).

The criteria for determining which accidents must be included in the five-year accident history are found at 40 CFR 68.42. Guidance on the criteria and the reportable data elements for the five-year accident history are found in the *General Risk Management Program Guidance*, available on our website at: (http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/EPAguidance.htm).

When you are ready to submit your corrected RMP, click on the button "Create Submission File." RMP*Submit will prompt you for:

Submission Type:

- **First-time RMP Submission**
- **Correction to my current RMP**
- **Re-Submission (all 9 sections are updated and certified)**

Be sure to check the "correction" box. Also, select your reason for the correction from the pick list. The pick list choices are:

C01 Clerical error corrected
C02 Additional information supplied
C03 Minor administrative change
C04 Notification of facility ownership change

C05 New accident history information
C06 Change in emergency contact information
C07 New data element required by EPA
C08 Optional data element requested by EPA
C09 Removed OCA description from executive summary

CHAPTER 7 UPDATING AND CERTIFYING ALL 9 SECTIONS OF YOUR RMP: RE-SUBMISSION

In general, you must fully update your RMP no later than 5 years after the postmark date of your last submission, or sooner if any of the changes specified in §68.190(b) (see box below) occur. However, the five-year anniversary for facilities that submitted an RMP *before* the initial due date of June 21, 1999, is June 21, 2004, not earlier. Note that the regulation uses the term "stationary source" to refer to a facility.

> **68.190 Updates**.
> (b) The owner or operator of a stationary source shall revise and update the RMP submitted under § 68.150 as follows:
> (1) Within five years of its initial submission or most recent update required by paragraphs (b)(2)-(b)(7) of this section, whichever is later.
> (2) No later than three years after a newly regulated substance is first listed by EPA;
> (3) No later than the date on which a new regulated substance is first present in an already covered process above a threshold quantity;
> (4) No later than the date on which a regulated substance is first present above a threshold quantity in a new process;
> (5) Within six months of a change that requires a revised PHA or hazard review;
> (6) Within six months of a change that requires a revised offsite consequence analysis as provided in §68.36; and
> (7) Within six months of a change that alters the Program level that applied to any covered process.

To submit a "re-submission," you must update all nine sections of your RMP. If you submitted electronically, revise your previous RMP as appropriate and submit the updated RMP on diskette. You must also submit a new certification letter for the updated RMP that covers all the information in the RMP. A sample certification letter can be found in Appendix C. Re-submissions will re-set the 5-year anniversary date by which you must next update your RMP at the latest.

When you are ready to "Submit" your updated RMP, RMP*Submit will prompt you for:

Submission Type:

- **First-time RMP Submission**
- **Correction to my current RMP**
- **Re-submission (all 9 sections are updated and certified)**

Be sure to check the "Re-submission" box. Also, select your reason for the re-submission from

the pick list. The pick list choices are:

R01	Newly regulated substance listed by EPA (40 CFR 68.190(b)(2))
R02	Newly regulated substance above TQ in already covered process (40 CFR 68.190(b)(3))
R03	Regulated substance present above TQ in new (or previously not covered) process (40 CFR 68.190(b)(4))
R04	Revised PHA / Hazard Review due to process change (40 CFR 68.190(b)(5))
R05	Revised OCA due to change (40 CFR 68.190(b)(6))
R06	Change in program level of covered process (40 CFR 68.190(b)(7))
R07	5-year update (40 CFR 68.190(b)(1))
R08	Process no longer covered (source has other processes that remain covered) (40 CFR 68.190(b)(7))
R09	Voluntary update (not described by any of the above reasons)

CHAPTER 8 NOTIFYING EPA THAT YOUR FACILITY IS NO LONGER COVERED BY RMP: DE-REGISTRATION

Changes may occur at your facility that make it no longer subject to the RMP regulations at 40 CFR Part 68 (e.g. you replace the regulated substances in your process with unregulated substances.) If your facility is no longer covered by RMP, you must notify EPA as specified in §68.190(c) (see box below). Note that the regulation uses the term "stationary source" to refer to a facility.

> **68.190 Updates**
>
> (c) If a stationary source is no longer subject to this part, the owner or operator shall submit a de-registration to EPA within six months indicating that the stationary source is no longer covered.

To de-register, you should submit a letter to the RMP Reporting Center within six months and include the effective date of the de-registration (the date on which you facility was no longer covered by part 68). The letter should be signed by the owner or operator and include your RMP ID number (the 12-digit ID number assigned by EPA).

You can use RMP*Submit to generate the letter for you by running the de-register function (from the Main Menu screen).

If your facility de-registers and later becomes subject to the RMP regulation again, you will need to submit a new RMP. Submit the new RMP as a re-submission (see Chapter 7 of this manual) using your previous EPA Facility ID #.

De-registered facilities will be noted as such in RMP*Info. De-registered RMPs will remain in RMP*Info for 15 years.

Important Reminders

Remember to include the 12-digit EPA Facility Identification number (usually beginning with 1000) that was assigned to your facility. The EPA Facility ID was given to you in the notification letter you received from the RMP Reporting Center regarding the submission status of your RMP.

Current Mailing Address for RMP Reporting Center

Mail the signed letter to:

Risk Management Plan (RMP) Reporting Center
P.O. Box 1515
Lanham-Seabrook, Maryland 20703-1515

For courier and overnight delivery packages, the address is:

Risk Management Plan (RMP) Reporting Center
c/o CSC
Suite 300
8400 Corporate Drive
New Carrollton, MD 20785

GLOSSARY OF ACRONYMS & TERMS

CBI	Confidential Business Information
CPU	Central Processing Unit
DLL	Dynamic Link Library
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
GPF	General Protection Fault
MB	Megabyte(s)
NAICS	North American Industrial Classification System
OCA	Offsite Consequence Analysis
Pick List	A list of items to choose for an answer.
POTWs	Publicly Owner Treatment Works
RAM	Random Access Memory
RMP	Risk Management Plan
VGA	Video Graphics Adapter