

RETA Chapter Meeting Schedule

ALABAMA

BIRMINGHAM
2nd Thursday

ARIZONA

PHOENIX
4th Thursday; 6 pm
SOUTHWEST
2nd Thursday; 6 pm

ARKANSAS

NORTHWEST ARKANSAS
2nd Thursday; 6 pm

CALIFORNIA

BAY AREA
3rd Wednesday; bi-monthly;
6:30 pm
CALIFORNIA CHAPTER #2
3rd Wednesday; 6 pm
No meeting in December

CENTRAL VALLEY
3rd Thursday; 6:30 pm

INLAND EMPIRE
3rd Tuesday; 6 pm

KERN
Last Wednesday; 7 pm

MONTEREY BAY
3rd Wednesday; 6 pm

SAN JOAQUIN
2nd Tuesday; 6 pm

SANTA MARIA
Not scheduled

DELAWARE

DELMARVA
3rd Tuesday; 6:30 pm

FLORIDA

CENTRAL FLORIDA
3rd Thursday; 6:30 pm

NORTH FLORIDA
2nd Thursday; 6:30 pm
No meeting in July or October

SOUTH FLORIDA
2nd Thursday

GEORGIA

ATLANTA
2nd Tuesday; 6:30 pm
No meeting in June or July

IDAHO

TREASURE VALLEY
3rd Tuesday

ILLINOIS

CHICAGO
2nd Wednesday; 5:30 pm

INDIANA

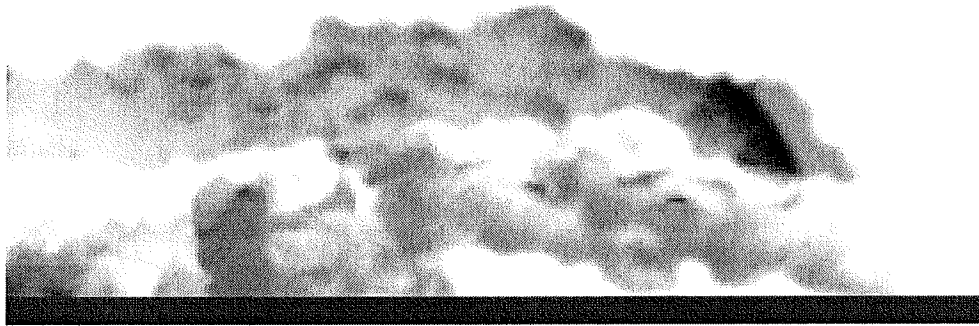
FT. WAYNE
2nd Thursday; 5:30 pm

MINNESOTA

NORTHERN PLAINS
3rd Thursday; 6 pm

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PSM/RMP Compliance



SOLVING THE RMP FIVE YEAR ACCIDENT HISTORY CRITERIA PUZZLE

— HanhPhuc Nguyen and Lee Frederickson, SCS Tracer Environmental

Five-Year Accident History, we know it is a requirement and needs to be reported, but should that one release *incident* at your facility that happened within the past five years be included? How hard can it be to determine this?

During the 2004-2005 RMP*Submit submission period, 23.3 percent reported accidents as *no-consequence* accidents.^[1] No-consequence accidents are accidents without any reportable injuries, deaths, environmental damage, evacuations, sheltering, medical treatment or onsite or offsite property damage. Wow – is this what the EPA really wanted?

The engineering rule of thumb to solving anything is to first define the problem.

Define the Big Picture:

EPA's Risk Management Program (40 CFR § 68.42(a))^[2] requires applicable facilities to report a Five-Year Accident History in their Risk Management Program, as stated below.

“The owner or operator shall include in the five-year accident history all accidental releases from **covered processes** that resulted in **deaths, injuries, or significant property damage** on site, or known **offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage.**”

To really understand how things work, we need to break it down into small pieces.

Let's Break Down the Puzzle!! ^[3]

Covered Processes

A process that has a regulated substance present in more than the threshold quantity (>10,000 lbs of ammonia).

On-site deaths

Employees, contractor employees, offsite responders, and/or others (e.g. visitors) who were killed by direct exposure to toxic concentrations, radiant heat, or overpressures from accidental releases or from indirect consequences of a vapor explosion from an accidental releases.

Injuries

Any effect on a human (onsite and/or offsite) from a release of a regulated substance that requires **medical treatment** or hospitalization

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Conference Countdown

RACING FOR EDUCATION & SAFETY

RETA 2011 NATIONAL CONFERENCE SEPTEMBER 19-22 GREENSBORO, NC

The golf tournament this year is about more than tee shots, birdies, long drives or sinking putts. It's also an opportunity to help raise funds for a local nonprofit.

The Carolinas Chapter is raising money for Victory Junction, a camp for children with special medical needs, just down the road in Randleman, NC. The camp was founded in memory of **Adam Petty**, the son of NASCAR icon **Kyle Petty**. Adam, a fourth-generation NASCAR driver, was killed in an accident while racing at the New Hampshire Motor Speedway. After his death, his family partnered with **Paul Newman** and the Hole in the Wall Gang Camp and formed Victory Junction.

HOW TO HELP

Golfers can make a \$50 donation to Victory Junction through RETA's Buy-A-Skirt Program the day of the tournament. By buying a skirt, you get the chance to tee-off from the ladies' tee at the 13th hole – just when you're game might need a little more drive.

TOURNAMENT DETAILS

Monday, September 19, 2011
8 am Tee Time

Grandover Resort and Golf
\$150 per person

(includes transportation, lunch, green fees and cart)

Enjoy a beautiful day and help send more children to this unforgettable camp experience.

SOLVING THE RMP FIVE-YEAR ACCIDENT HISTORY CRITERIA PUZZLE

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Medical Treatment

Any treatment, other than first aid, administered by a doctor or registered personnel under the supervision of a physician.

Significant Property Damage

The value of the equipment or business structures for the business that were damaged by the accident or mitigation activities, excluding any losses that may have been incurred as a result of business interruption.

Off-site deaths

Community members who were killed by direct exposure to toxic concentrations, radiant heat, or overpressures from accidental releases or from indirect consequences of a vapor explosion from an accidental releases.

Evacuations

Members of the community who were evacuated to prevent exposure that might have resulted from the accident excluding those who were ordered to move simply to improve access to the site for emergency vehicles.

Sheltering in Place

Members of the community who were ordered to remain inside their residence or place of work until the emergency was over to prevent exposure to the effects of the accidental release.

Environmental Damage

Any damage to the environment [e.g. dead or injured animals, defoliation (lawn, shrub, or crop damage), water contamination].

It Matches with the Criteria of the Five-Year Accident History!

Where do I go from here?

The RMP Five-Year Accident History is to be included in the following sections:

Program 1:

Offsite Consequence Analysis [40 CFR §68.20].

Program 2:

Offsite Consequence Analysis,
Hazard Review, and
RMP [40 CFR §68.168].

Program 3:

Offsite Consequence Analysis,
Process Hazard Analysis,
RMPeSubmit under Section 6.0.

General Duty Clause:

Offsite Consequence Analysis and
Hazard Review.

Is There a Deadline? [40 CFR §68.190] and [40 CFR §68.195]

- The Five-Year Accident History must be submitted with the RMP when the RMP is initially submitted.
- The Five-Year Accident History must be updated every five years, with the resubmission of the RMP. This includes all accidents within five years of the date

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2011 Exhibitors

- AAIM Controls Inc.
- Acuren
- Airgas Specialty Products
- Alfa Laval Inc.
- Ammonia Process Safety Management
- Ammonia Safety & Training Insitute (ASTI)
- Armstrong International
- ARTS Academy
- Bacharach Inc.
- Baltimore Aircoil Company
- Benshaw, Inc.
- Calibration Technologies
- Camco Lubricants
- Cascade Energy, Inc.
- Century Refrigeration-RAE Corporation
- Chem-Aqua Inc.
- Colmac Coil Manufacturing, Inc.
- Concepts and Designs, Inc.
- Cool Air Incorporated
- Cornell Pump Company
- Cyrus Shank Company
- Danfoss Inc.
- Delta Tee International Inc.
- Draeger Safety, Inc.
- Evans Builders, Inc.
- Evapco
- Extol of Ohio Inc.
- Farley's S.R.P. Inc.
- FLSmith Inc.
- Frick by Johnson Controls
- Gamma Graphics Services
- Garden City Community College Ammonia Refrigeration Training
- GEA FES, Inc.
- General Refrigeration Company
- GfG Instrumentation
- Golder Associates Inc.
- H.A. Phillips & Co.
- Hansen Technologies Corporation
- HCR Incorporated

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that the RMP is submitted. Accidents which occurred prior to the five year period do not need to be included in the Five-Year Accident History.

- Your RMPeSubmit and corresponding programs must be updated within six months of the date of the accident.

Those Hard to Define Pieces Solved!¹³

Q: Should a stationary source subject to the RMP regulations report as part of the Five-Year Accident History any accidents that occurred when the facility was under prior ownership?

A: Yes. Owner and operator should include all accidental releases from a covered process that resulted in specified consequences such as, death, injury, or significant property damage regardless of who owned or operated the facility.

Q: A process involving a regulated substance had an accidental release with off-site consequences two years ago. The process has been shut down. Do I have to report anyway?

A: No.

Q: I had a release where several people were treated at the hospital and released; they attributed their symptoms to exposure. We do not believe that their symptoms were the result of exposure to the released substance. Do we have to report these as offsite impacts?

A: Yes. Ensure to explain/include that you do not believe that the impacts are legitimately linked to the release and explain why in the Executive Summary.

Q: Do newly constructed facilities need to complete the five-year accident history in their initial RMP Submission?

A: If a facility has had no accidents meeting the rule's accident reporting criteria in the previous five years, it will not need to include information in the five-year accident history in their initial RMP Submission.

With the tools provided, you can get started on your facility Five-Year Accident History puzzle. If the criteria fit, the time starts ticking. Don't forget the six-month update deadline.

REFERENCES

¹ Kleindorfer, R. Paul, Lowe, A. Robert, Rosental, Isadore, Fu, Rongwei, Bleke, C. James, Elliott, R. Micheal, Santiago, L. Armando, and Wang, Yanlin, *Accident Epidemiology and the RMP Rule: Learning from a Decade of Accident History Data for the U.S. Chemical Industry*, The Wharton School of the University of Pennsylvania and Office of Emergency Management, and U.S. Environmental Protection Agency, December 18, 2007.

² *General Guidance on Risk Management Programs for Chemical Accident Prevention, Chapter 3: Five Year Accident History*, EPA, March 2009.

³ *Emergency Management - Frequency Questions*, U.S. EPA, May 25, 2011, <<http://emergencymanagement.supportportal.com/ics/support/default.asp?deptID=23016>>.