RETA Chapter Meeting Schedule

ARIZONA
PHOENIX
4th Thursday; 6 pm
SOUTHWEST
2nd Wednesday; 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
Last Thursday; 6 pm
No meeting December

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 Thursday; 6:30 pm
No meeting in June or July

IDAHO
TREASURE VALLEY
3rd Tuesday

PSM/RMP Compliance

ANOTHER ROUND OF RMP REVALIDATIONS

By Thomas Britt, SCS Tracer Environmental

EPA's Accidental Release Prevention Program regulation (40 CFR Part 68) was approved in June 1996 to satisfy Section 112(r) of the 1990 Clean Air Act Amendments. All applicable facilities were required to prepare key risk and safety programs by June 21, 1999 to satisfy the Risk Management Program (RMP) requirements. Thus, most facilities in existence prior to June 21, 1999, are on the same five-year revalidation schedule (2004, 2009, and now again in 2014).

The EPA RMP regulation requires that applicable facilities conduct the following revisions/updates at the five-year anniversary:

- *"At least every five years after the completion of the initial PHA, the PHA shall be updated and revalidated..."* (EPA RMP 40 CFR 68.67(f) and OSHA 1910.119(e)(6)).
- A facility shall *"review and update the offsite consequence analyses at least once every five years"* (EPA RMP 40 CFR 68.36).
- A facility must revise and update the Risk Management Plan submittal *"within five years of its initial submission"* (EPA RMP 40 CFR Part 68.190).

Be aware that based on your location there may be state-specific requirements as well, such as a Seismic Assessment, state or local regulatory submittal, etc.

The **Process Hazard Analysis (PHA)** must be revalidated by a qualified team to document any changes to the hazards identified in the initial PHA and to assure that the PHA is consistent with the current process. At least one member of the revalidation team must be knowledgeable and have experience with the process being evaluated, and at least one member must be knowledgeable in the specific process hazard analysis methodology being used. The PHA Revalidation should include, at a MINIMUM, the following tasks:

- A review of the recommended action items from the initial and/or previous PHA studies.
- A site walk to review the accuracy of the piping diagrams.
- A discussion of any changes to the process since the previous PHA study.
- A discussion of any releases of regulated substances since the previous PHA study.

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ANOTHER ROUND OF RMP REVALIDATIONS

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The **Offsite Consequence Analysis (OCA)** must be reviewed and updated every five years, if there are changes to the process, or if there are changes in the quantities of regulated substances stored or handled onsite. The OCA update serves to supplement the initial OCA by providing updated maps and sensitive receptor information as well as assuring that the worst case and alternative case release scenarios are still applicable. The worst case release scenario selected must create the greatest distance to the toxic endpoint. This is typically a release from the largest vessel, but it could be a release from a smaller vessel located outside if the largest vessel is located inside a building.

When selecting the alternative case release scenario for your facility, the following situations should be considered:

- Any accidents involving regulated substances that have occurred over the past five years.
- Transfer hose releases due to splits or sudden uncoupling.
- Process piping releases from failures at flanges, joints, welds, valves, etc.
- Process vessel or pump releases due to cracks, seal failure, etc.
- Vessel overfilling and spill, or over-pressurization and venting through relief valves.
- Shipping container mishandling and breakage or puncturing.

The **Risk Management Plan** must be updated and resubmitted [aka Revalidated] at least once every five years (note, there are other criteria for corrections; this article is just addressing the five year Revalidation requirement). The RMP is submitted electronically to the EPA using RMP*eSubmit through the Central Data Exchange (CDX) website (http://cdx.epa.gov). To create an account on CDX you will need the facility's EPA Identification number. The EPA Identification Number is a 12-digit number that starts with 1000 (e.g. 1000 0012 3456) and is unique for the purposes of the RMP. If you do not have documentation regarding your EPA Identification Number or your five-year anniversary date, you can go to: http://www.rtknet.org/, *Databases, Risk Management Plans,* and search for your location or you can contact the RMP Reporting Center. When you have finished creating your CDX account, you will be asked to print out and sign an Electronic Signature Agreement (ESA). The ESA

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RETA Chapter Meeting Schedule

ILLINOIS
CHICAGO
2nd Wednesday; 5:30 pm

INDIANA
FT. WAYNE
2nd Thursday; 5:30 pm

KANSAS
GOLDEN PLAINS
To be determined

MINNESOTA
NORTHERN PLAINS
3rd Thursday; 6 pm

N/S CAROLINA
CAROLINAS (NC)
2nd Thursday; time varies
No meeting in June, July or August
GREATER RALEIGH (NC)
2nd Wednesday; time varies
No meeting in June, July or August

NEBRASKA
OMAHA
Not Scheduled

NEVADA
SOUTHERN NEVADA
2nd Monday; 5 pm

NEW YORK
WESTERN NEW YORK
3rd Tuesday; 6 pm

OHIO
COLUMBUS
to be determined

OREGON
WILL H. KNOX
2nd Tuesday
WILLAMETTE VALLEY
2nd Wednesday; 5:30 p.m.

OKLAHOMA
TULSA
2nd Tuesday; 6:30 pm

PENNSYLVANIA
NORTHEASTERN (NEPA)
4th Thursday; 6 pm
SOUTHEASTERN (SEPA)
2nd Tuesday; 6:30 pm
No meeting in June, July or August
PHILADELPHIA
3rd Thursday; 6 pm
No meeting in June, July or August

RETA Chapter Meeting Schedule

TEXAS

HIGH PLAINS
3rd Tuesday; 7 pm

DALLAS/FT. WORTH
3rd Thursday; 7 pm

HOUSTON
4th Thursday; 6:30 pm
No meeting in July, November or December

WACO
1st Thursday; 6:00 pm

VIRGINIA

OLD DOMINION
2nd Thursday; 6:30 pm

WASHINGTON

TRI CITIES
2nd Thursday; 6 pm

PUGET SOUND
2nd Wednesday; 6 pm

WISCONSIN

MADISON
2nd Tuesday; 6 pm
No meeting in June, July or August

MILWAUKEE
2nd Thursday; 5 pm
No meeting in June, July or August

WESTERN WISCONSIN
2nd Wednesday; 5:30 pm
No meeting in June, July or August.

ANOTHER ROUND OF RMP REVALIDATIONS

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must be mailed to the EPA before they will send you the Authorization Codes necessary to finish registering your facility. Since this process can take up to four weeks, it's a good idea to create your account early. Some key items to review when resubmitting your Risk Management Plan, include, but are not limited to:

- Verify the contact information for the RMP Responsible Person and the Emergency Contact in Section 1. Review the Maximum Intended Inventory and ensure that supporting documentation exists.
- Review/update the Accident History in Section 6. Be aware that the Accident History must include any accidental releases of regulated substances that occurred over the past five years from your processes and resulted in deaths, injuries, or significant property damage on site, or known off-site deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. You are allowed to remove data from accidents that occurred more than five years ago.
- Review and update the dates listed in Section 7 or Section 8 (depending on RMP Program level). Be sure you have paperwork to support any dates listed (e.g., audit dates, maintenance logs, training records, management of change records, contractor evaluations, etc.).
- Review your facility's Responding versus Non-Responding capabilities and update Section 9 accordingly. Call your emergency response and agency notification telephone numbers to be sure they are correct. Conduct a review of the agencies that require notification to be sure you have an up-to-date listing.

With 2014 right around the corner, now is the perfect time to start thinking about revalidating your PHA studies, updating your OCA, creating your CDX account, and reviewing your Risk Management Plan submittal. And don't forget to sign and mail in your ESA!