

# RETA Chapter Meeting Schedule

## ALABAMA

BIRMINGHAM  
2<sup>nd</sup> Thursday

## ARIZONA

PHOENIX  
4<sup>th</sup> Thursday; 6 pm  
SOUTHWEST  
2<sup>nd</sup> Thursday; 6 pm

## ARKANSAS

NORTHWEST ARKANSAS  
2<sup>nd</sup> Thursday; 6 pm

## CALIFORNIA

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

CENTRAL VALLEY  
3<sup>rd</sup> Thursday; 6:30 pm

INLAND EMPIRE  
3<sup>rd</sup> Tuesday; 6 pm

KERN  
Last Wednesday; 7 pm

MONTEREY BAY  
3<sup>rd</sup> Wednesday; 6 pm

SAN JOAQUIN  
2<sup>nd</sup> Tuesday; 6 pm

SANTA MARIA  
Not scheduled

## DELAWARE

DELMARVA  
3<sup>rd</sup> Tuesday; 6:30 pm

## FLORIDA

CENTRAL FLORIDA  
3<sup>rd</sup> Thursday; 6:30 pm

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

SOUTH FLORIDA  
2<sup>nd</sup> Thursday

## GEORGIA

ATLANTA  
2<sup>nd</sup> Tuesday; 6:30 pm  
No meeting in June or July

## IDAHO

TREASURE VALLEY  
3<sup>rd</sup> Tuesday

## ILLINOIS

CHICAGO  
2<sup>nd</sup> Wednesday; 5:30 pm

## INDIANA

FT. WAYNE  
2<sup>nd</sup> Thursday; 5:30 pm

## MINNESOTA

NORTHERN PLAINS  
3<sup>rd</sup> Thursday; 6 pm

Continued on page 9

# PSM/RMP Compliance



## SOLVING THE RMP FIVE YEAR ACCIDENT HISTORY CRITERIA PUZZLE

— HanhPhuc Nguyen and Lee Frederickson, SCS Tracer Environmental

**F**ive-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.<sup>[1]</sup> 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))<sup>[2]</sup> 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!! <sup>[3]</sup>

#### **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

Continued on page 10

# 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 13<sup>th</sup> 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

*Continued from page 8*

### 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

*Continued on page 16*

## 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

Continued on page 17

## SOLVING THE RMP FIVE-YEAR ACCIDENT HISTORY CRITERIA PUZZLE

Continued from page 10

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!<sup>13</sup>

**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

<sup>1</sup> 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.

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

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