

PSM/RMP Compliance

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

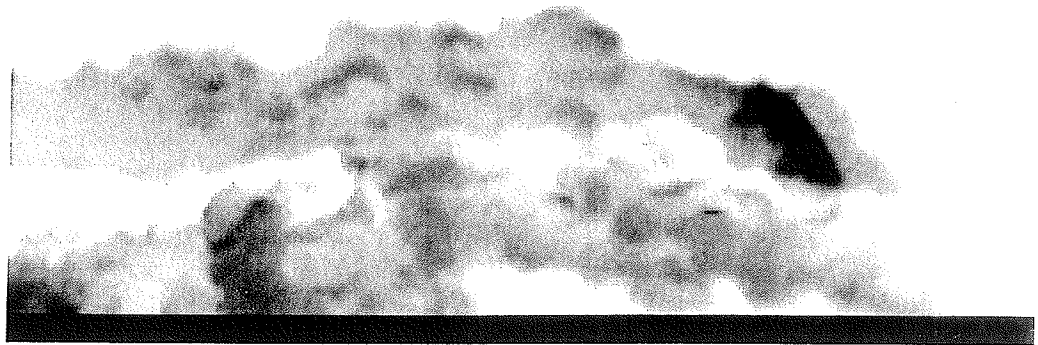
FT. WAYNE
2nd Thursday; 5:30 pm

KANSAS

GOLDEN PLAINS
To be determined

MINNESOTA

NORTHERN PLAINS
3rd Thursday; 6 pm



FEDERAL EPA RMP ESubmit DIRECTIONS

— Lee Pyle, SCS Tracer Environmental

For some of you, this is already a done deal, but for those who built a new ammonia refrigerated facility after the initial EPA RMP submittal due date of June 21, 1999, you may need to pay attention. For facilities handling extremely hazardous substances, in quantities that exceed the EPA Risk Management Program (RMP) threshold listed in 40 CFR Part 68 (e.g., 10,000 of ammonia), you are required to revalidate your submittal to EPA every five years. This article focuses on the EPA resubmittal.

To assist with this resubmittal (and the fact that new computers do not come with a 3.5" floppy disk drive anymore), facilities are able (and now required) to submit their RMPs online via EPA's secure website. RMP*ESubmit became available in 2009. All facilities can make revisions and other small changes to certain administrative sections of their Risk Management Plan submittal on-line, eliminating the need to mail diskettes and certification letters for such corrections and five year revalidation submittals.

For those who were not part of the initial June 21, 1999 club, there may be some of you that have not obtained access to the on-line version of your RMP. I encourage you to act now. This is an easy tool to help you stay in compliance.

The first step begins with the facility's RMP Responsible Person (the person who will be signing/certifying the RMP) registering the facility with EPA. This is required for all facilities, regardless of whether or not this is an initial submission or a re-submittal.

The following is taken directly from the "Risk Management Plan RMP*ESubmit Users' Manual" -

STEP 1: Go to <http://cdx.epa.gov> and begin the registration process.

- Begin by selecting the link "If you are new to CDX and wish to register, please click here."
- On the *Registration Warning Notice* page, select the "Click here to continue" link.
- On the *Terms & Conditions* page, read, then select the "I ACCEPT" button. The link will take you to the *Registration* page.
- Complete your one-time registration on the *CDX Registration* screens. Provide your User Name, Password and other information, then click "NEXT". **Note: Write down the Username and Password on a separate piece of paper and store it in a safe place where you can access it later.**
- Complete the registration information for the organization, then click "NEXT".

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FEDERAL EPA RMP ESUBMIT DIRECTIONS

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- On the *CDX Registration: Add Program* page, select the button for "Risk Management Plan (RMPESUBMIT)" and click "NEXT".
- On the *CDX Registration: Add Program ID* page, select your role as "A SUBMITTER," then select Program ID Type as "Certifying Official". Enter "N/A" in the ID field. Click "FINISHED".
- As the Certifying Official, enter your official business title or role (e.g., Owner, Operator, Senior Management Official, etc...), and click "SAVE".
- You will now see the congratulations screen confirming your CDX registration. Click "FINISHED" on this page to go to the *Security Question* page.
- You will now see a screen with a list of security questions. Select and answer five questions from the list. When you certify an RMP, the program will randomly ask one of the five selected questions as an additional verification of your identity. *Note: Write down the questions and your answers on a separate piece of paper and store it in a safe place where you can access it later.*

Click on "SAVE ANSWERS" after you have selected your five questions. This will activate the receipt page for the eSIG-PIN questions that you just answered.

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RETA Chapter Meeting Schedule

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N/S CAROLINA

CAROLINAS
 1st Thursday; time varies
 No meeting in June, July or August
 GREATER RALEIGH (NC)
 No meeting in June, July or August

NEBRASKA

OMAHA
 To be determined

NEVADA

SOUTHERN NEVADA
 2nd Monday; 5 pm

NEW YORK

WESTERN NEW YORK
 3rd Tuesday; 6 pm

OREGON

WILL H. KNOX
 2nd Tuesday

OKLAHOMA

TULSA
 2nd Tuesday; 6:30 pm

PENNSYLVANIA

NORTHEASTERN (NEPA)
 2nd 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

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

VIRGINIA

OLD DOMINION
 To be determined

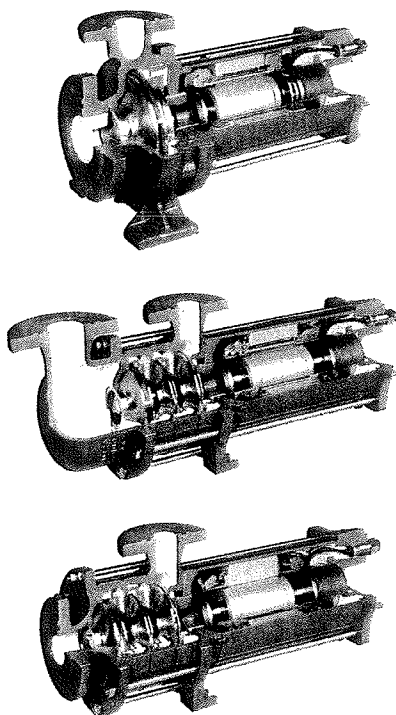
WASHINGTON

CONNELL
 2nd Thursday; 6 pm
 TRI CITIES
 2nd Thursday; 6 pm
 PUGET SOUND
 2nd Wednesday; 6 pm

WISCONSIN

MADISON
 2nd Wednesday; 6 pm
 No meeting in June, July or August
 MILWAUKEE
 2nd Thursday; 6 pm
 No meeting in June, July or August

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Policy Update

A BADGE OF DISTINCTION

— Don Tragethon,
Executive Director

It is coming up on 20 years since **Curt Lashlee** and I drove 265 miles to Salinas, CA to take the certification exam in the conference room at Grower's Ice Company. The exam was administered by **Russell Ramos**. Russ was chairman of the program at that time. The trip up to Salinas seemed to take forever – the return trip was shorter it seemed, probably because we both passed two rigorous examinations (Level B and Level A).

The certification program was completely voluntary back then. It still is, actually, since there is no regulatory agency demanding that operators and technicians become RETA certified, specifically. At that time, there wasn't much appreciation for the achievement of being a certified operator. Today the story is very different. More than 3,000 people have been certified during the 23 years of the certification program. Last month, more people sat for the exam than did in the whole year of 1994. Agencies are aware of RETA certification and do have a respect for those who have earned certification.

During these years, there has been talk of designing and providing a uniform patch or monogram for certified operators. In May, all the certified and current operators received a RETA patch for their jackets or coveralls. Immediately, the phone calls began to come in from operators who wanted to buy patches

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FEDERAL EPA RMP ESubmit DIRECTIONS

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- Click "CONTINUE" to go to your *MyCDX* to see the added Account Profile.
- You will be asked to login into "MyCDX". Once logged in, click the "RMPESUBMIT: Certify Submission" link to add RMP facilities.

Note: Only the Certifier has the option to add facility(s).

- Click "Add New RMP Facilities" to create your Electronic Signature Agreement (ESA) for each facility you will be certifying.
- You will now add the facility(s) you want to be associated with your profile.

It is important to enter the correct Facility ID of the specific facility for which you will be submitting an RMP.

Click "SAVE". The ESA will appear. Upon completion, CDX will prompt you to print the ESA.

- Once you have printed and closed the ESA, a *Successfully Registered* confirmation page will be displayed. This completes your registration as a certifier.
- Follow the instructions on how to **sign and mail** the ESA to the RMP Reporting Center.

STEP 2: EPA will approve the ESA (2-4 weeks). An e-mail containing the AuthCodes for your facility will be sent to the Certifying Official via e-mail. The facility's RMP "preparer" can use the AuthCodes to gain access to the information online and make corrections or updates as needed.

REMINDER:

In addition to the five year revalidation update to EPA, facilities are required to update their submittal registration as follows:

1. No later than three years after a newly regulated substance is first listed by US EPA.
2. No later than the date on which a new regulated substance is first present in an already covered process above a threshold quantity;
3. No later than the date on which a regulated substance is first present above a threshold quantity in a new process;
4. Within six months of a change that requires a revised PHA;
5. Within six months of a change that requires a revised off-site consequence analysis (i.e. process is moved so as to affect different sensitive receptors, the quantity of the regulated substance is increased, etc.);
6. Within six months of a change that alters the program level;
7. New accident history information - For any accidental release meeting the five-year accident history reporting criteria, the owner or operator shall submit the data required with respect to that accident within six months of the release.
8. Emergency Contact information - Beginning June 21, 2004, within one month of any change in the emergency contact information, the owner or operator shall submit a correction of that information.