



Recent RMP Updates: How does this affect your facility?

November 7th, 2024

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Agenda

1. Introduction to RMP
2. General Requirements
3. New Requirements
4. Summary
5. Questions

Introduction to RMP & PSM

- ▶ History of RMP & PSM
- ▶ RMP Applicability
- ▶ Program Thresholds



Purpose of PSM and RMP

▶ OSHA PSM Standard (1992)

- Designed to prevent or minimize the consequences of *catastrophic releases* of the following in the workplace:
 - ◆ Toxic,
 - ◆ Reactive,
 - ◆ Flammable, or
 - ◆ Explosive chemicals
- Focus is within the fence line and protects:
 - ◆ Workforce
 - ◆ Contractors
 - ◆ Visitors

▶ EPA RMP Rule (1994)

- Designed to protect the environment and community by preventing or mitigating offsite consequences of catastrophic chemical releases.
- Focus is outside of the fence line and protects:
 - ◆ Nearby residents
 - ◆ General public around the facility
 - ◆ Adjacent facilities such as schools and hospitals

Differences between PSM & RMP

Applicability Determination

- Threshold Quantity (TQ) & Concentrations
- PSM has a general flammable category as well as a toxic & flammable chemical list
- RMP only has toxic and flammable lists
- Exemptions differ between the programs

Program Requirements

- PSM has Trade Secret element
- RMP has Management System, Offsite Consequence Analysis, 5-year Accident History, RMPlan

PSM & RMP - Who is Covered?

Chemical

- Manufacturers
- Warehouses
- Wholesalers

Petrochemical

- Refining and Gas Processing Operations
- Plastics and Resins
- Synthetic rubber

Other Manufacturing

- Electronics Semiconductors
- Paper
- Fabricated Metals
- Industrial Machinery
- Furniture
- Textiles

Agriculture

- Fertilizers

Utilities

- Public Facilities (Drinking and Wastewater Treatment)
- Electric

Food and Cold Storage

- Ammonia Refrigeration

Installations

- Military
- Energy

RMP Applicability

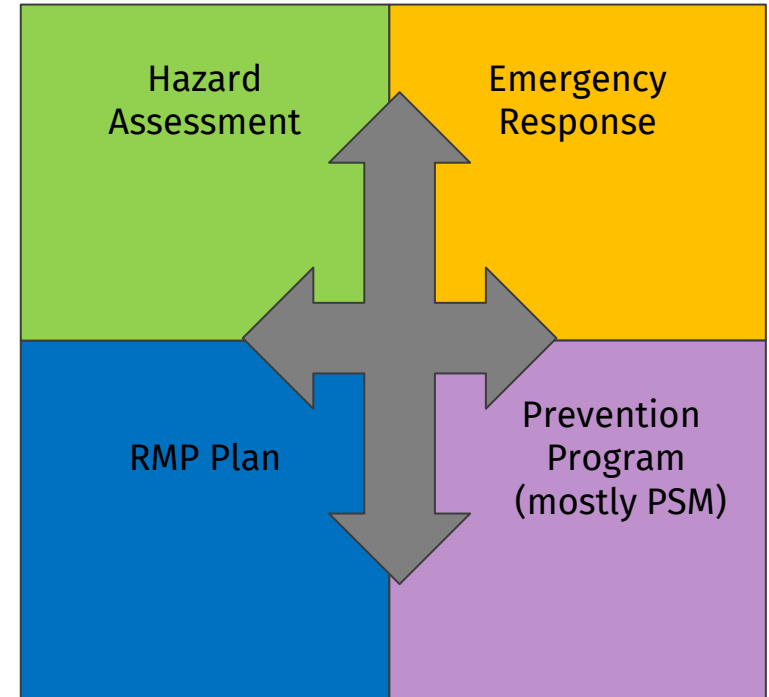
- ▶ Owner or operator of a stationary source
 - Any buildings, structures, equipment, installations or substance emitting stationary activities
- ▶ Has more than a threshold quantity (TQ)
 - 1% by weight or greater **OR**
 - \geq a chemically-specific concentration (Tables 1-4) **OR**
 - Partial vapor pressure \geq 10 mmHg *
 - Follow rules for aggregation and mixtures
- ▶ Of a regulated substance
 - 77 toxic compounds – TQs of 500-20,000 lb in a process
 - 63 flammable compounds – TQs of 10,000 lb in a process

▶ In a Process

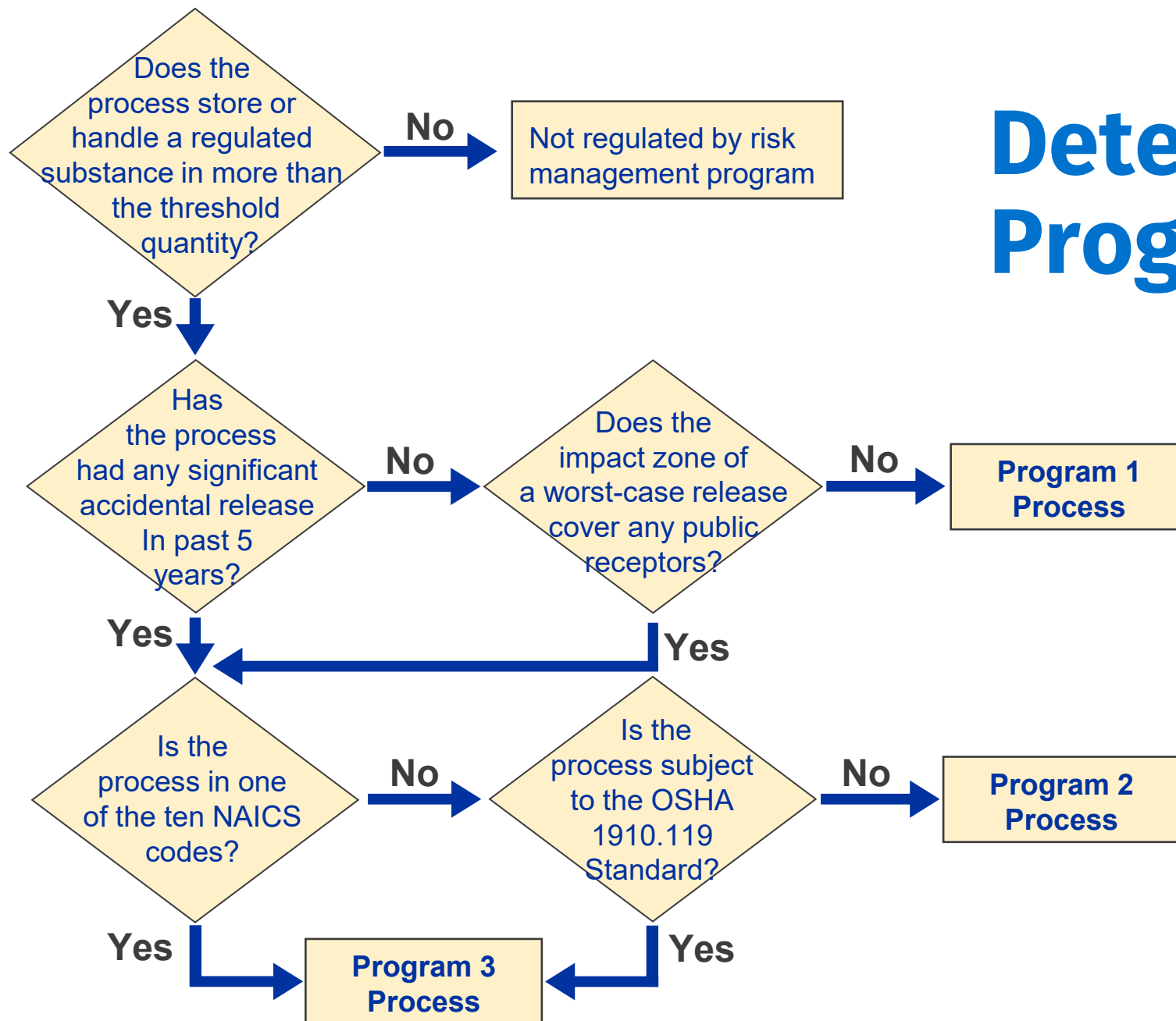
* Except toluene diisocyanate isomers and oleum

Tiered Approach for RMP

- ▶ Program Level 1: No impact program
 - ▶ Program Level 2: Streamlined RMP
 - Worst-case release impacting public
 - Not subject to OSHA PSM
 - ▶ Program Level 3: Full program
 - Worst-case release impacting public AND
 - Subject to OSHA PSM OR List of 10 NAICS Codes
-
- ▶ Different levels may be used for different processes on-site.
 - May elect to use a higher level for all processes for simplicity.



Determining Program Level



General RMP Requirements

- ▶ All Processes
- ▶ Program 2 Processes
- ▶ Program 3 Processes

Risk Management Program Plans

- ▶ Submit an initial plan
 - Three years after a new regulated substance is listed
 - The date on which a regulated substance is first present at quantities above TQ
- ▶ Plans must be updated every 5 years
 - Offsite consequence analysis and plan elements must be updated every 5 years
 - Often the anniversary date is the same year
 - EPA reporting software is RMP*eSubmit
- ▶ Checklist:
 - https://www.epa.gov/sites/production/files/2014-01/documents/rmp_checklist-1.pdf

RMP Updates

- ▶ Must update the RMP within 6 months of any:
 - Change that requires a PHA or hazard review
 - Change that requires a revised offsite consequence review
 - Change that affects the program level
 - Accident that meets the 5-year accident history criteria
 - Deregister – if no longer subject to RMP
- ▶ Must correct the emergency contact information within 1 month
 - Name, title, telephone number
 - Use “Correction” button – does not affect 5-year anniversary date

Risk Management Plan Sections

- ▶ Executive summary
- ▶ Site registration data
- ▶ Offsite consequence analysis (worst case scenario data)
- ▶ Alternative release scenario data
- ▶ 5-year accident history
- ▶ Prevention program summary **(2, 3)**
- ▶ Emergency response program summary
- ▶ Certification by responsible official



Program 2 and 3* Processes (1 of 2)

- ▶ RMP Additions:
 - Prevention program elements
- ▶ Management System to implement RMP elements
- ▶ Written Procedures on:
 - Process Safety
 - Mechanical Integrity
 - Management of Change*
- ▶ Employee Training (refresher every 3 years)
- ▶ Prevention Program Compliance Audit (internal) every 3 years

* Indicates the requirement is only for Program 3 Processes

Program 2 and 3* Processes (2 of 2)

- ▶ Conduct Hazard Review/Process Hazard Analysis (PHA) and update every 5 years or in the event of a process change
- ▶ Evaluate contract workers with respect to RMP compliance and safe work practices *
- ▶ Annual Coordination with Local Emergency Response/Planning
- ▶ Emergency Response Program (unless non-responding)
- ▶ Annual Exercise of Emergency Response Notification
 - Before 12/14/2024 & annually after

* Indicates the requirement is only for Program 3 Processes

New RMP Requirements

New Requirements (all Programs)

▶ **By May 10, 2027**

▶ Root Cause Analysis

- In the event of an RMP-reportable incident; included in incident report (completed within 12 months of incident)
- Describes direct/indirect contributing factors and the root cause.

▶ Maintain Hot Work Permits for 3 years

▶ Information Available to Public

- Provided upon request to those living or working within 6 miles of a facility's fenceline
- Includes regulated substance information, 5-year accident history, emergency response program information, contact information, etc.

New Requirements (Programs 2 and 3) (1 of 4)

- ▶ Emergency Response Field Exercise **before March 15, 2027**, or at least every 10 years *
- Testing notification to federal, state, and local emergency response agencies
- Testing procedures and measures for emergency response (including evacuations and medical treatment),
- Testing communication systems,
- Testing mobilization of facility emergency response (including contractors),
- Emergency response equipment deployment.

* Indicates the requirement is only for responding facilities

New Requirements (Programs 2 and 3) (2 of 4)

- ▶ Emergency Response Tabletop Exercise **before December 21, 2026**, and then at least every 3 years thereafter *
- Testing notification to the public and emergency response agencies,
- Procedures and measures for emergency response (including evacuations and medical treatment),
- Identification of facility emergency responders and contractors (and their responsibilities),
- Coordinating with local emergency responders,
- Procedures for emergency response equipment deployment.

* Indicates the requirement is only for responding facilities

New Requirements (Programs 2 and 3) (3 of 4)

▶ **By May 10, 2027**

▶ Third Party Audits

- Following an accidental release or as required by the agency

▶ Develop a Written Plan of Action regarding employee participation in RMP development

- Annual notice to employees indicating the RMP is ready for review
- Develop / implement process to involve employees to report on unaddressed hazards
- Employee reports must be maintained for 3 years

New Requirements (Programs 2 and 3) (4 of 4)

▶ **By May 10, 2027**

- Recommended earlier if Hazard Review/PHA is reviewed earlier
- ▶ Address facility siting, natural hazards and standby/emergency power for monitoring systems in PHA
- ▶ Safer Technology and Alternative Risk Management
 - Only for Petroleum/Coal Products and Chemical Manufacturing facilities
 - Document inherently safer technology or design, passive measures, active measures, and procedural measures taken to reduce risk
 - Implement a passive measure (or inherently safer technology or design), if meeting the conditions of 40 CFR 68.67(c)(9)

Summary

Compliance Calendar Summary

Requirement	Applicable Dates
Emergency Response Tabletop Exercise	December 21, 2026
Emergency Response Field Exercise	March 15, 2027
Safer Technologies and Alternatives Analysis (STAA) included in PHA	May 10, 2027
Root Cause Analysis Incident Investigation	May 10, 2027
Third-Party Compliance Auditing	May 10, 2027
Employee Participation	May 10, 2027
Information Availability	May 10, 2027
RMP Resubmittal to reflect these requirements	May 10, 2028

Questions?



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