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RMP*SUBMIT™ USER'S MANUAL

for RMP*Submit Version 1.07, issued January 4, 1999

RMP SERIES

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Introduction

The RMP*Submit User Manual provides assistance in preparing and submitting Risk Management Plans (RMPs) under Section 112(r) of the Clean Air Act. RMP*Submit software is designed to significantly reduce errors in submission through "checks " for each data element.

The RMP*Submit User Manual includes:
Technical help on using RMP*Submit;

- –Instructions on how to complete each data element;
- –Details on how to submit your RMP; and
- –What to expect after you submit.

Also included are ten Appendices, including a copy of the RMP paper form (Appendix A) for those who need to submit their RMP on paper. Appendices C and D include the necessary forms for claiming Confidential Business Information (CBI), since these may not be submitted electronically. In addition to this User Manual, you should refer to other RMP guidance documents, which are listed in Appendix I.

For software questions or installation problems, contact the RMP Reporting Center at (703) 816-4434 (8am-4:30pm M-F) or via e-mail at: userrmp.usersupport@epcra.org. For RMP compliance assistance, call the Hotline at (800) 424-9346 or (703) 412-9810.

This is the first edition of RMP*Submit (version 1.07), dated January 1999. We welcome your comments and suggestions for improving RMP*Submit. Send your comments to:

RMP*Submit Comments
Chemical Emergency Preparedness and Prevention Office (MC 5104)
U.S. Environmental Protection Agency
401M St., SW
Washington, DC 20460

Email: homepage.ceppo@epa.gov

1. RMP*SUBMIT USER HELP

A. INTRODUCTION

This technical user manual provides instructions for using the RMP*Submit software program. RMP*Submit is an automated tool for reporting Risk Management Plan (RMP) information.

A.1. On-line Help

RMP*Submit Windows Help provides on-line access to the *Risk Management Plan Data Element Instructions* for each field, as well as for keyboard equivalents and shortcut keys.

To get context-sensitive Help
Press **<F1>** to get context-sensitive Help for the data entry field in which the cursor is located.

To display the Help Table of Contents
Choose **Contents** from the **Help** menu or in the Help window, click the **Contents** button. The Table of Contents provides an overview of Help and access to all Help topics.

To search for information
The Search command enables you to quickly find Help topics about a particular subject. To get Help for a specific item or task, choose **Search for Help on...** from the Help menu, or in the Help window, click the **Search** button from the Help Menu. As you type the first few letters of the subject you are interested in, RMP*Submit scrolls through a list of subjects to locate a matching entry. Double-click your subject, or select the subject and choose Show Topics.

To see a list of Help topics you looked up
Click **Options** from the **Help** menu and click **Display History Window**. The History list shows the help topics you have looked up in the current Help session only. Each time you open Help, it begins a new History list.

To print a topic
Click the **Print** button or select **Print Topic** from the **File** menu in the Help Window.

To return to the previous Help topic
Click the **Back** button.

To keep Help on top
Normally the Help window displays behind the application when you click outside the window. However, in Windows 3.1 you can choose **Always on Top** from the Help window's **Options** menu to keep the Help window in view while you work. Choosing **Always on Top** toggles the option on and off. In Windows 95, select **Keep Help on Top** to keep the Help window in view and **Not on Top** to turn the option off.

To exit Help
Select **Exit** from the **File** menu. Windows 95 users can press **<Esc>** to close the current Help window.

A.2. Saving Your Work

Since RMP*Submit automatically saves the information you enter, there are no explicit "SAVE" buttons or menu options. For more information on how data is saved, and how to cancel or un-do entries, see section C.4.6., "Reversing Data Entry Changes."

A.3. Document Conventions

The conventions used in this manual are as follows:

- Computer commands are bolded (e.g., select **Print**).
- Keystrokes to be typed are bolded and enclosed within less than (<) and greater than (>) symbols (e.g., press **<F1>**).
- Two keystrokes joined by a plus sign (+) indicates that the two keys should be pressed simultaneously (e.g., **<Alt+C>**).

The *RMP*Submit User Manual* assumes that users are familiar with basic Microsoft Windows concepts. For additional help, see the *Microsoft Windows User's Guide.*

B. GETTING STARTED

This section describes the hardware and software requirements, installation procedures, and instructions for starting and exiting the application.

B.1. System Requirements

The RMP*Submit software program is supplied on four 3.5-inch, 1.44-MB diskettes in compressed format or CD-ROM. To install and run RMP*Submit, you will need 6 to 10 MB of available hard disk space and a minimum of 16 MB of Random Access Memory (RAM). Listed below are the minimum computer hardware and software requirements for installing and running RMP*Submit.

<u>Hardware/Software Requirements</u>
Personal Computer: IBM-compatible with a 486 DX2 or higher Central Processing Unit (CPU) (Pentium is recommended).

Monitor: Video Graphics Adapter (VGA) or compatible displays (SVGA is recommended).

Operating Environment: Microsoft Windows Version 3.1 or Windows 95.

Printer: Hewlett-Packard LaserJet or compatible printers are recommended. Inkjet printers may be used; however, their report printing performance is not as reliable as the LaserJet.

Mouse: Microsoft compatible mouse or other compatible pointing device.

Using a slower processor and/or less memory will significantly impact performance, with memory being the greater factor.

RMP*Submit may also be run under Windows 95; however, users may cause General Protection Faults (GPF) to occur if they use Windows 95 graphical elements such as the ☒**(Close)** button in the right-hand corner of the title bar. As a result, users may experience unexpected results if they do not close RMP*Submit forms under program control by using the **Close** button. Additionally, installing some Microsoft Office 95 or Microsoft Office 97 applications after RMP*Submit has been installed may cause the Jet 2.5 Dynamic Link Library (DLL) to be replaced with the 32 bit Jet 3.0 or Jet 3.5 database DLL. As a result, users may experience unexpected results. Section 2.2 further addresses this issue.

B.2 Installation Procedures

The RMP*Submit installation disks will install the software on your computer's hard drive.

Instructions for Installing and Running RMP*Submit

To install RMP*Submit from the four-disk set:

2.Insert diskette 1 into your floppy disk drive (drive A:).

3.In Windows 95, click the **Start** Button, then click **Run**. In Windows 3.1, choose **Run** from the Program Manager **File** menu.

4.Enter **A:SETUP.EXE**

5.Click **OK** to start the setup program, then follow the setup program instructions.

To install RMP*Submit from CD:

1.Insert the RMP*Submit/RMP*Comp CD into your CD-ROM drive.

2.In Windows 95, click the **Start** Button, then click **Run**. In Windows 3.1, choose **Run** from the Program Manager **File** menu.

3.Enter **d:\SUBMIT\RMPSUBMT.EXE** [*where "d" is your CD-ROM drive letter*].

4.Click **OK** to start the setup program, then follow the setup program instructions.

To install RMP*Submit from Internet download:

1.Download the file RMPSUBMT.EXE and save it to directory of your choice. Information on RMP*Submit can be found at http://www.epa.gov/ceppo/rmpsubmit.html

2.In Windows 95, click the **Start** Button, then click **Run**. In Windows 3.1, choose **Run** from the Program Manager **File** menu.

3.Enter **c:\path\RMPSUBMT.EXE** *[replace c:\path with the directory location where RMPSUBMT.EXE was saved*]. Alternatively, you may click **Browse** to locate the file.

4.Click **OK** to start the setup program, then follow the setup program instructions.

B.3 Starting and Exiting RMP*Submit

To Run RMP*Submit from Windows 95:

1.Click the **Start** Button, and point to **Programs** to get a list of all your installed programs.
2.Point to **RMP Submit**, and click on **RMP-Submit**.

Or, if you have the **RMP Submit** explorer window open, simply double click on the **RMP-Submit** icon.

To Run RMP*Submit from Windows 3.1

1.In the Program Group window **RMP Submit** double-click on the **RMP-Submit** icon.

To exit RMP*Submit

1. Click **Exit** from the Main Menu or select **<File, Exit>** from the menu bar.

2. The application will prompt you with the message, "Are you sure you want to exit RMP*Submit?" Click **Yes.**

C. BASIC CONCEPTS

C.1 Risk Management Plan Structure

The RMP is comprised of nine sections and an Executive Summary. Section 1 Registration Information has three additional sub-sections. These entities are: 1) the covered processes that are being reported, 2) the process chemicals that are being reported for each covered process, and 3) the North American Industrial Classification System (NAICS) codes associated with each covered process. Additionally, Section 1 has an entity that contains the flammable chemicals in a flammable mixture registered for a covered process. Sections 2 through 5 contain data reported for the following four Off-site Consequence Analysis (OCA) scenarios: Toxics Worst Case, Toxics Alternative Releases, Flammables Worst Case, and Flammables Alternative Releases. Section 6 contains Accident History data. Accident History also

has an entity for reporting the chemicals that were involved in the accident. The Accident Chemical entity has another entity for reporting the flammable chemicals that were part of the flammable mixtures involved in the accident. Section 7 contains prevention program data for Program Level 3 covered processes, and Section 8 contains prevention program data for Program Level 2 covered processes. Each prevention program section has an entity that lists one or more chemicals reported for the prevention program. Section 9 defines the facility's Emergency Response Plan.

RMP*Submit is designed to ensure that chemicals reported in Sections 2 through 5 are related to the chemicals that were previously registered for covered processes. Similarly, chemicals and NAICS codes reported in Sections 7 and 8 must be related to chemicals and NAICS codes that were previously registered for covered processes. To accomplish this, RMP*Submit will allow users to select only logically correct chemical and NAICS code information for Sections 2 through 5, 7, and 8. To the user this means that covered processes must be created first, and these registered chemicals and NAICS codes must be used for reporting in the later sections. Since Section 6, Accident History, does not limit the user to the selection of chemicals and NAICS codes that were reported for the covered processes, any chemical or NAICS code in the RMP*Submit lookup tables provided may be selected.

C.2 Navigating RMP*Submit

This section describes how to navigate within RMP*Submit using either a mouse or keyboard. RMP*Submit functions can be accessed from either the menu bar or command buttons. You can access functions from the menu bar or the command buttons on each screen.

C.2.1 Command Button Footer

The footer to the List of Risk Management Plans Screen contains command buttons that provide access to the primary capabilities within RMP*Submit. Each command button has an underlined accelerator key associated with it. Pressing the **Alt** key and the underline key is the same as clicking on the button with the mouse. For example, press **<Alt+ P>** on your keyboard to select **Print**.

The List of Risk Management Plans Screen footer displays the following command buttons, which are described in Exhibit 1.

These command button functions are described in Exhibit 1.

Button	Function
New	Create a new RMP for a facility.
Edit	View or edit an RMP.
Delete	Delete the selected RMP.
Check	Validate the selected RMP.

Print	Print the selected RMP.
Submit	Create a submission file for the selected RMP by exporting RMP data to an ASCII text file.
Close	Return to Main Menu.

Exhibit 1. Command Button Functions

C.2.2 Menu Bars

Menu bars contain commands within RMP*Submit. Any of the menu items may be invoked by using your mouse to click on the item or pressing the underlined accelerator key corresponding to the function.

RMP*Submit provides menu bars for the Main Menu; List of Risk Management Plans; Data Entry (Sections 1 through 9 and the Executive Summary); and Report Options screens. The screens contain the following menu items; their functions are summarized in Exhibit 2.

- Main Menu - File, Edit, and Help.
- List of Risk Management Plans - File, Tools, and Help. The list of Risk Management Plans does not appear until after an RMP file has been created.
- Data Entry (Sections 1 through 9 and the Executive Summary) - File, Edit, and Help. Registration Information (Section 1) contains a Sections menu in addition to File, Edit, and Help.
- RMP Report Options - File and Help.

Menu/Submenu Item	Function
Main Menu File Menu	
Import	Import an RMP from an ASCII file.
Exit RMP*Submit	Close the RMP*Submit application.
Main Menu Edit Menu	
RMP	Go to RMP submenu items.
Data Entry	Go to RMP Data Entry form.
Options	Go to Options submenu items.
User Settings	Display user settings.
List of Risk Management Plans File Menu	
New	Create a new RMP.
Edit	View or edit a selected RMP.

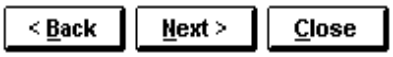
Menu/Submenu Item	Function
Delete	Delete a selected RMP from the database.
Submit	Create a submission file for a selected RMP.
Print	Display the RMP Report Options Screen to print an entire RMP or section of an RMP.
Close	Close the current form and return to the Main Menu.
Exit RMP*Submit	Close the RMP*Submit application.
List of Risk Management Plans Tools Menu	
Check	Validate the selected RMP.
Data Entry File Menu	
Print	Display the RMP Report Options Screen from which you can print an entire RMP or section of an RMP.
Close	Close the current form.
Exit RMP*Submit	Close the RMP*Submit application.
Data Entry Edit Menu	
Undo / Esc	Undo your data entry; clear data in current field.
Cut / Ctrl+X	Cut selected text and copy to the Windows clipboard.
Copy / Ctrl+C	Copy selected text to the Windows clipboard.
Paste / Ctrl+V	Paste selected text from the Windows clipboard.
Find / Ctrl+F	Search for a string of text within the current RMP.
Replace / Ctrl+H	Search for a string of text within the current RMP and replace it with another string of text.
Data Entry Sections Menu (Registration Information only)	
2. Toxic Worst Case	Go to Section 2 - Toxics Worst Case for the current RMP.
3. Toxic Alt. Release	Go to Section 3 - Toxics Alternative Release for the current RMP.
4. Flamm. Worst Case	Go to Section 4 - Flammables Worst Case for the current RMP.
5. Flamm. Alt. Release	Go to Section 5 - Flammables Alternative Release for the current RMP.
6. Accident History	Go to Section 6 - Accident History for the current RMP.
7. Prev. Prog. Level 3	Go to Section 7 - Prevention Program 3 for the current RMP.
8. Prev. Prog. Level 2	Go to Section 8 - Prevention Program 2 for the current RMP.

Menu/Submenu Item	Function
9. Emergency Response	Go to Section 9 - Emergency Response Plan for the current RMP.
Executive Summary	Display the Executive Summary for the current RMP.
RMP Report Options File Menu	
Print Setup	Open the Print Setup Dialog Box.
Close	Close the current form.
Exit RMP*Submit	Close the RMP*Submit application.
Help Menu (all sections)	
Contents	Go to on-line Help Contents Screen.
Search for Help on...	Go to on-line Help Search Index.
Technical Support	Display information on CEPPO Technical Support.
About RMP*Submit	Display information on RMP*Submit.

Exhibit 2. RMP*Submit Menu Item Functions

C.3.3 Navigating with a Mouse and Command Buttons

Use the **Back** and **Next** buttons to move forward and backward between "pages" of a data entry form. Click the **Close** button to close the form. The Back, Next, and Close buttons appear at the footer of Sections 1 through 9 data entry screens.



Use the **Sections** buttons to go to Sections 2 through 9 or the Executive Summary from the Registration Information section. In Sections 2 through 9 and the Executive Summary, when you reach the end of a data entry form, you must close the form and return to the Registration Information section before proceeding to another section.

C.3.4 Navigating with a Keyboard

Exhibit 3 describes the keyboard equivalents that can be used to navigate within RMP*Submit. Notice that the **<Tab>** key can be used to navigate between fields, much like using a mouse. Press **<Tab>** to go to the next field or **<Shift+Tab>** to go to the previous field. Using **<Tab>** is preferable to using **<Enter>**, which can cause previously entered data to be lost.

To navigate between sections of a form:	
Press	To
F6	Cycle forward through the header, detail section, and footer of a form. For computers attached to Novell servers, this key may be disabled.
Shift+F2	Zoom - to increase the size of a data entry box.
Shift+F6	Cycle back through the footer, detail section, and header of a form.
To navigate in forms with more than one page:	
Press	To
Page Down	Move down one page. At end of record, moves to top of next record.
Page Up	Move up one page. At top of record, moves to top of previous record.
To switch between modes:	
Press	To
F2	Switch between editing mode (with insertion point displayed) and navigation mode (entire field selected).
To navigate between fields and records (in navigation mode):	
Press	To
Tab, Right Arrow, or Enter	Move to the next field. Note: The Enter key will behave differently if you have changed the default using the View menu Options command.
Ctrl+Tab	Exit the subform and move to the next field in the master form; if not in a subform, move to the next field.
Shift+Tab	Move to the previous field.
Ctrl+Shift+Tab	Exit the subform and move to the previous field in the Master form; if not in a subform, move to the previous field.
Ctrl+Shift+Home	Move to the first field in the master form.
End	Move to the last field in the current record.
Ctrl+End	Move to the last field in the last record.
Home	Move to the first field in the current record.
Ctrl+Home	Move to the first field in the first record.
Ctrl+Page Down	Move to the current field in the next record.
Ctrl+Page Up	Move to the current field in the previous record.
To navigate in a combo box or list box:	
Press	To
F4 or Alt+Down Arrow	Open a combo box or list box.
Down Arrow	Move down one line.
Page Down	Move down one set of values.
Up Arrow	Move up one line.
Page Up	Move up one set of values.
Tab	Exit the box.
To navigate within a text box (when data is not selected):	
Press	To
Down Arrow	Move down one line.

Up Arrow	Move up one line.
End	Move to the end of the current line.
Ctrl+End	Move to the end of the last line.
Home	Move to the beginning of the current line.
Ctrl+Home	Move to the beginning of the first line.

Exhibit 3. RMP*Submit Keyboard Equivalents

C.4 Entering Data in RMP*Submit

C.4.1 Drop Down Lists

Drop down lists are provided to ensure that users select appropriate choices for RMP data elements where applicable. Lookup tables used to populate drop down lists are part of the RMP*Submit application, not the RMP database. To select a value from a drop down list, click the down arrow to the right of the list to see the list and click the desired value to enter it in the field. Pressing **<F4>** will also open the drop down list that currently has the focus. Long drop down lists have up and down arrows for scrolling through the list. You may also type in the first character of the value you want to select from the list. RMP*Submit will fill in the selection with the first value from the list that matches the characters you type. Exhibit 4 indicates drop down list data fields with values restricted to the list. Exhibit 5 shows drop down list data fields that allow the user to enter other values not limited to list (i.e., you can either select a value from the list or enter your own).

Section 1 Facility: Facility State Facility County Owner/Operator State Latitude/Longitude Method Latitude/Longitude Description NAICS Chemical Name	**Section 5 Flammables Alternative Release:** Chemical Name End Point Used
Section 1 Flammable Mixture: Chemical Name	**Section 6 Accident History:** NAICS Code Chemical Name Weather Conditions: Wind Speed Unit Code Weather Conditions: Wind Direction Initiating Event
Section 2 Toxics Worst Case: Chemical Name Physical State Scenario Topography	**Section 6 Flammable Mixture:** Chemical Name
Section 3 Toxics Alternative Release: Chemical Name Physical State Topography	**Section 7 Prevention Program 3:** NAICS Chemical Name

Section 1 Facility: Facility State Facility County Owner/Operator State Latitude/Longitude Method Latitude/Longitude Description NAICS Chemical Name	**Section 5 Flammables Alternative Release:** Chemical Name End Point Used
Section 4 Flammables Worst Case Scenario: Chemical Name	**Section 8 Prevention Program 2:** NAICS Chemical Name

Exhibit 4. Drop Down List Data Fields With Restricted Values

Section 1 Facility: LEPC Last Safety Inspection Performed By	**Section 4 Flammables Worst Case Scenario:** Model Used
Section 2 Toxics Worst Case: Model Used	**Section 5 Flammables Alternative Release:** Model Used Scenario
Section 3 Toxics Alternative Release: Model Used Scenario	

Exhibit 5. Drop Down List Data Fields With Unrestricted Values

C.4.2 Entering Date and Time

Date fields can be entered in several different formats as shown by the following examples.

8/16/98	8/16/1998	August 16, 1998	August-16-1998
aug-16-1998	aug-16-98	aug 16 98	16 aug 1998
aug-16 (inserts current year)		**<CTRL+;>** inserts current date into field	

No matter which format is used to enter the date, it will display in the format 08/16/1998. Check to ensure that you have entered a valid date. RMP*Submit also validates the date field as follows: If you enter a year between 100 and 1899, RMP*Submit will not save your entry. If you enter a year between 1900 and 1949, RMP*Submit will add 100 years to the date. Any date greater than 1949 will be accepted as is.

C.4.3 Facility Address Carry-Over

If your owner/operator mailing address is the same as your facility address, RMP*Submit provides a simple way to fill in the address fields. Click the **Copy Facility Address** button to automatically fill in this information.

C.4.4 Check Boxes

Many of the data fields in RMP*Submit are check boxes. In RMP*Submit, check boxes are yes/no fields that default to "no." A check indicates a response of "yes." Clicking inside the boxes or pressing the space bar toggles the check mark (X) on and off.

C.4.5 Status bar

The status bar displays helpful formatting information and brief instructions about selected fields, command buttons, or menu items. The status bar appears in the lower left-hand corner of the RMP*Submit window. More detailed field help is available by pressing **<F1>**, as described elsewhere in this document.

C.4.6 Reversing Data Entry Changes

RMP*Submit provides two ways to undo keyboard inputs using the **<Ctrl+Z>** and **<Esc>** keys. **<Ctrl+Z>** is used to undo a previous action in almost all Windows (and DOS) programs. Its behavior is the same in RMP*Submit. If you inadvertently delete, type over, or copy into a data field, its previous value can be restored by pressing the **Ctrl** and **Z** keys simultaneously, which will either undo or redo your last action. This keyboard editing technique may also be performed using the **Edit**, **Undo** menu item. Note that the menu item displays **Undo Delete** or **Undo Typing** depending on what you did last.

Some data entry forms allow you to enter many instances of data, such as several Program Level 2 prevention programs where data for each prevention program is stored in a record in the database table for Prevention Program 2 data. When you open one of these data entry forms you can view and edit all existing records, one at a time. A record navigation control is provided on the bottom left portion of the data entry form. Each time you bring up an existing record from the database, its contents are put into a copy buffer. As you edit existing data or enter new data, the data is written to this copy buffer. When the current record loses focus such as when you go to the next or a new record or when you close the form, the contents of the copy buffer are written back to a record in the appropriate database table. This automatic saving of data is why you do not see any **Save** buttons in RMP*Submit as you might in other database programs. The **Esc** key has a special relationship to the copy buffer. If you want to undo the last entry of data into a field, press the **Esc** key. This will re-establish the previous contents of the field. If you want to undo all edits to a record, press the **Esc** key twice. For example, let's say during an edit session you bring up a record and begin to edit several fields. You suddenly realize that this is the wrong record. Simply press the **Esc** key twice and the copy buffer will be refreshed with the original data, enabling you to safely leave the record without destroying its original contents.

C.5. Saving/Backing Up RMP*Submit Data

It is important that you create backup copies of your RMP*Submit data, to avoid having to re-enter the information after a system malfunction. There are several circumstances that can result in the loss of your data:

- A hard drive failure may require you to re-format or to replace your drive.
- If your computer is turned off while the system is updating the RMP database, the database can become corrupt and unusable.
- If, for any reason, you re-install the RMP*Submit application, the RMP database will be overwritten with a new, empty database file.

To backup your RMP data, simply copy the file SRMPDATA.MDB to an alternate location. SRMPDATA.MDB can be found in the directory or folder to which you installed the RMP*Submit application, usually C:\RMP. It is recommended that you copy this file to a diskette (the A drive), or to some other removable media (such as a zip drive). You may also choose to copy the file to a network file server drive. The important point is that the file be copied to a drive that is different from the one you are using to run RMP*Submit. You should exit the RMP*Submit application before making the backup copy. The frequency of backup depends on how much time you spend entering data. Making a backup after each hour of data entry means that you will have, at most, one hour of data re-entry after restoring from the backup copy.

To restore your data, copy the file SRMPDATA.MDB from the backup location into the directory of folder to which you installed the RMP*Submit application, usually C:\RMP, overwriting if necessary the SRMPDATA.MDB file that may already be there. In case of re-installation of RMP*Submit, perform the re-installation before copying the SRMPDATA.MDB backup copy.

D. USING RMP*SUBMIT

D.1 Welcome to RMP*Submit

When you start RMP*Submit, the Welcome to RMP*Submit Screen appears. The Welcome Screen (Exhibit 6) summarizes the steps for entering and submitting RMP data. Click the **Close** button to close the Welcome Screen and go to the Main Menu. To disable the Welcome Screen so that it does not display again, click the **"Don't display this message again"** box at the bottom of the Welcome screen. To re-enable the display of this dialog box, select **Edit –> Options – > User Settings** from the menu bar of the Main Menu.

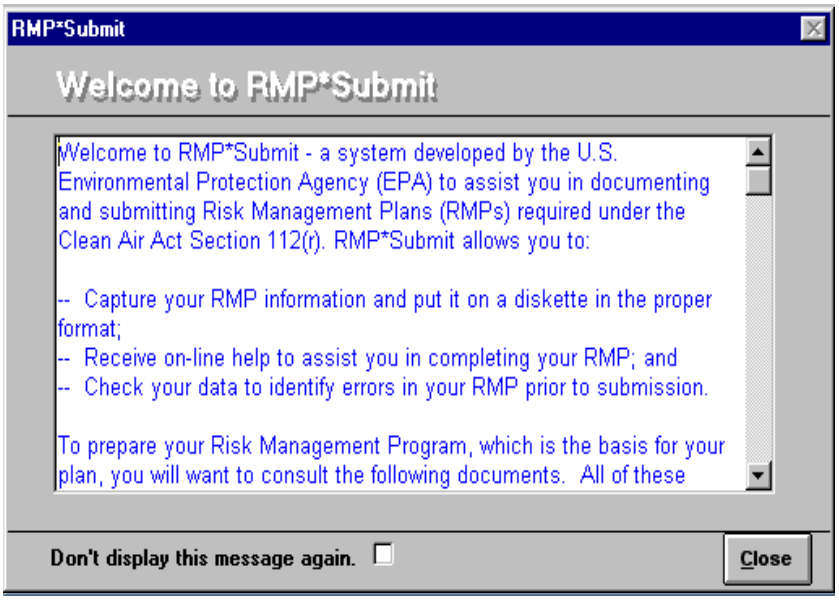


Exhibit 6. Welcome to RMP*Submit

Tip When the Welcome to RMP*Submit Screen first appears, clicking the vertical scroll bar may cause all the text to be highlighted (selected). If so, simply click inside the text box or press **<F2>** to clear (unselect).

D.2 Main Menu

The Main Menu form (Exhibit 7) provides access to three major functions: Data Entry; Import; and Exit. The Main Menu form is a "switchboard" type form used to access all of the features of RMP*Submit.

Exhibit 7.

Main Menu

D.3 Data Entry

The Data Entry function allows you to add new or edit existing RMPs. The Data Entry function provides the capability to capture data elements for the Executive Summary, Registration, Worst Case, and Alternative Release Scenarios, Five-Year Accident History, Program Level 2 and Program Level 3 Prevention Programs, and Emergency Response Plan sections of the RMP.

1. From the Main Menu, click the **Data Entry** button. If you have not previously created an RMP or if there are no existing RMPs, you will go directly to the Section 1 Registration Information Screen. If you have existing RMPs, the List of Risk Management Plans Screen will be displayed (Exhibit 8). The List of Risk Management Plans Screen displays a list of previously entered RMPs, by facility name.

2. Double-click a facility name to go to the Section 1 Registration Information Screen.

3. Single-click a facility name to select an RMP and execute any of the following RMP functions: edit selected RMP, delete selected RMP, check selected RMP, print selected RMP, or submit selected RMP. Section 4.1 describes the check, print, and submit functions.

4. To delete a selected RMP, click the **Delete** button. All records related to the selected RMP are deleted.

5. Click **New** to create a new RMP for this, or another facility.

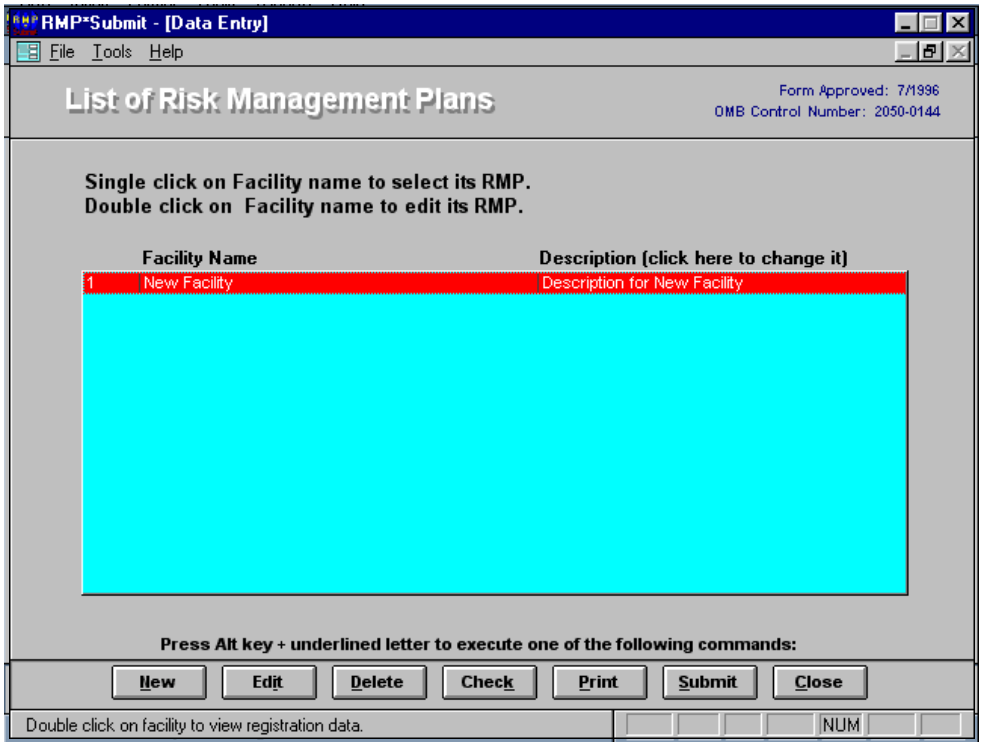


Exhibit 8. List of Risk Management Plans

D.3.1 Adding and Editing RMP Data

The Section 1 Registration Information Screen (Exhibit 9) is the cornerstone for assembling your RMP data. RMP Sections 2 through 9 and the Executive Summary for a given facility are only accessible while the Registration Information Screen for the facility is open. This approach ensures that the data you enter is for the correct facility when using RMP*Submit to create RMPs for more than one facility.

Tip Pressing **<F2>** selects/deselects previously entered data in the field that has the focus and switches between editing mode (with insertion point displayed) and navigation mode (entire field selected).

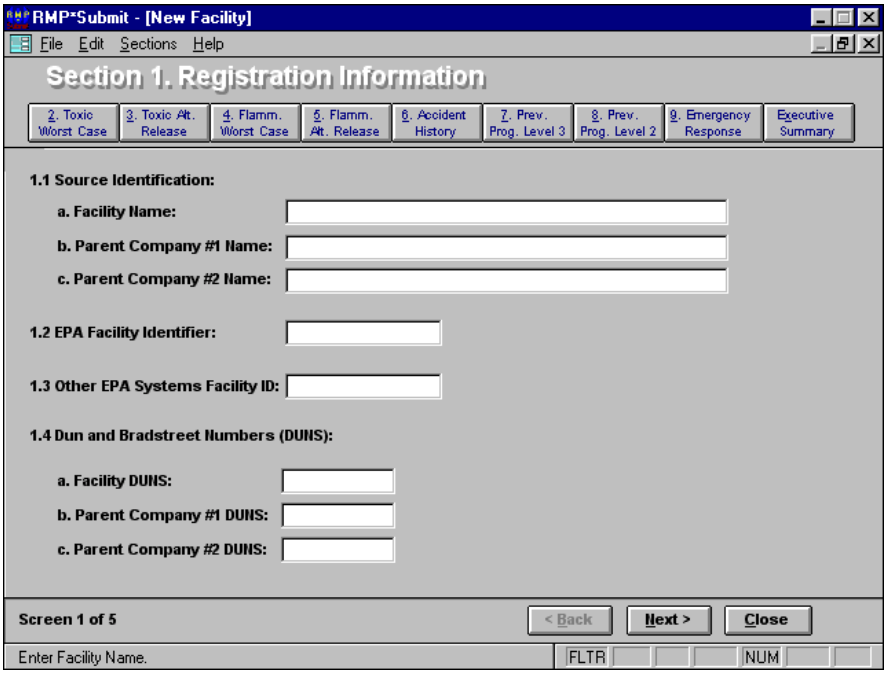


Exhibit 9. Section 1 Registration Information

To further assist you in preparing your RMP, the application will not allow you to enter data for Sections 2 through 5, 7, and 8 until you have created processes, registered chemicals, and selected NAICS codes that are logical for each section.

Using the **<Tab>** and **<Shift+Tab>** keys or the mouse to move from field to field, enter data in Section 1 as indicated in the *Risk Management Plan Data Element Instructions* using the navigation and data entry concepts described in Section 3.0 of this document. For data elements 1.5.g through 1.5.j, you must enter the latitudinal and longitudinal coordinates for your facility, the method for determining latitude and longitude, and the description of location identified by the latitude and longitude. To obtain Help in entering your facility latitude and longitude information, click the **Latitude Longitude Help** button.

Further, only Process chemicals and NAICS codes that are appropriate for an RMP section will be available through drop down lists in each section. For example, you will not be able to prepare Toxics Worst Case scenarios until you have registered some toxic chemicals. Conversely, you will never be allowed to select a flammable chemical or substance when you are preparing a Toxics Worst Case scenario. To register chemicals in a covered process:

1. Click the **Processes** button located at the bottom of the last page of the Registration Data Entry form. (The number in parentheses indicates the number of processes that you have already entered.) The 1.17 Processes Dialog Box is shown in Exhibit 10. You cannot access other menu commands or switch to another form while the dialog box is open.

2. Enter a description for your process (optional). This description may be helpful in selecting chemicals in other sections of the RMP, but the description will not be submitted to EPA with the RMP data.

3. Enter a program level: 1, 2, or 3. You will not be allowed to enter NAICS codes or chemicals until you enter the program level for the process. The program level that you enter here relates to other sections of the RMP, so once you have entered the program level, the only way you can change it is by deleting the Process record and entering a new Process record. For further information, see Program Eligibility Criteria in the *Risk Management Plan Data Element Instructions*.

4. Click the **NAICS Codes** button. The **NAICS Codes** button displays the total number of NAICS codes you have selected for the process.

5. Select the NAICS code associated with the process or select a NAICS code from the drop down list. To delete a NAICS code, click the **Delete NAICS Code** button, while the NAICS code has the focus. Click **Close** to return to the Processes Dialog Box.

6. From within the Process/Chemicals subform, select a Chemical Name to register for the process. Chemicals are restricted to the drop down list.

7. Enter the quantity (in pounds) of each chemical in the process.

8. Select a chemical and click the **Delete Chemical** button to delete a previously entered chemical from a process. RMP*Submit displays a message box stating the chemical name to delete.

9. Click the **Close** button at the bottom of the screen to return to Section 1 Registration Information.

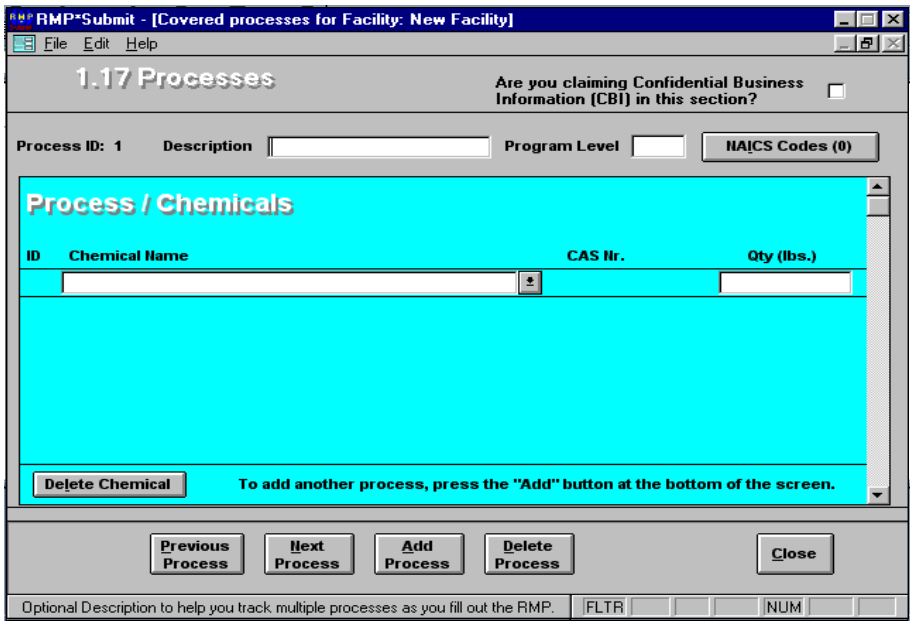


Exhibit 10. Processes Dialog Box

The table in Exhibit 11 describes the functions of the command buttons located at the bottom of the Processes Dialog Box. These functions apply to the entire process, not just the process chemicals in the subform.

Button	**Function**
Back	Go to previous process.
Next	Go to next/ new process.
Add	Add a new process.
Delete	Delete a process (including all related NAICS code and chemical data).
Close	Close the Processes dialog box and return to the form.

Exhibit 11. Processes Dialog Box Functions

To enter chemicals in a flammable mixture:

1. Select Flammable Mixture from the Chemical Name drop down list. The Chemicals in Flammable Mixture Dialog Box appears (Exhibit 12).

2. From the drop down list, select the chemicals that comprise the flammable mixture.

3. Click **Close** to return to the Processes dialog box.

Note: Each time a chemical is registered for a specific process, it is removed from the drop down list. The only exception is “Flammable Mixture,” which may be selected more than once.

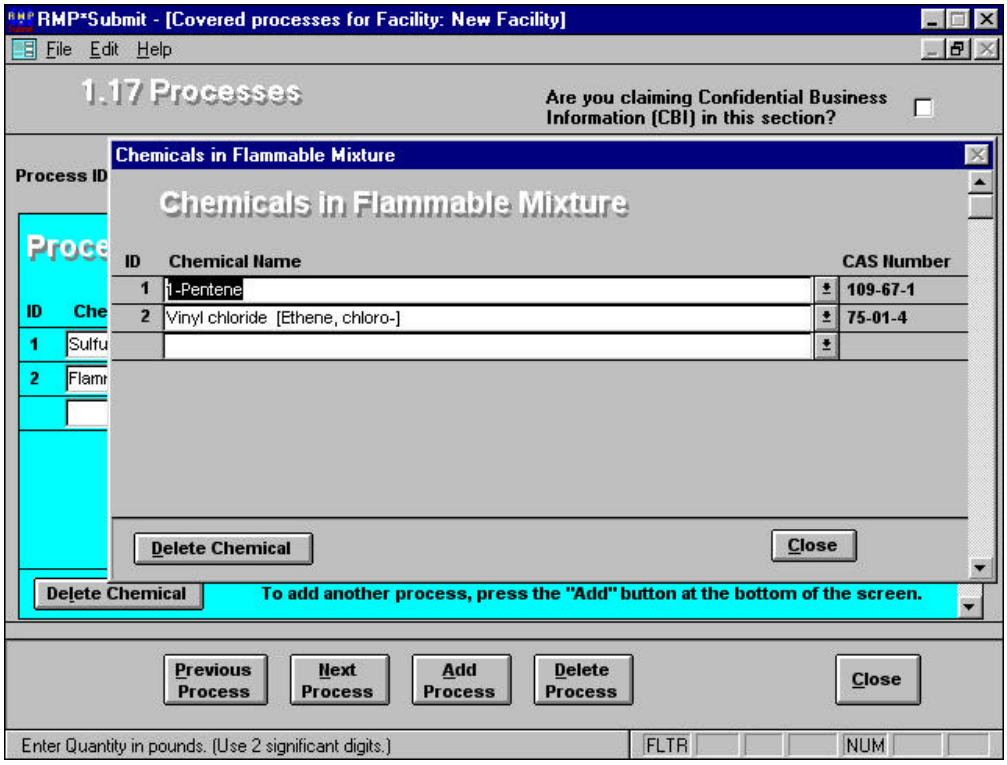


Exhibit 12. Entering Chemicals in Flammable Mixture

To enter data in Sections 2 through 9 and the Executive Summary:

1. Click one of the **Section** buttons at the top of the screen to go to a particular section of the RMP.

2. Enter data as indicated in the *Risk Management Plan Data Element Instructions* and using the navigation and data entry concepts described in Section 3 of this document.

To enter chemicals reported in an accident history:

1. Click the **Chemicals** button in Section 6 Accident History. The Chemicals in Accident History Dialog Box displays (Exhibit 13).

2. Enter the chemical name, quantity, and percent weight (optional) for each chemical reported in your Accident History, as appropriate.

3. If the release was a flammable mixture containing regulated flammables, list it as a flammable mixture and list all of the regulated substances contained in the mixture. Follow the instructions in Help for entering a flammable mixture for registering a chemical for a covered process.

4. Select a chemical and click the **Delete Selected Chemical** button to delete a previously entered chemical.

5. Click the **Close** button to close the Chemicals in Accident History Dialog Box and return to the Accident History form.

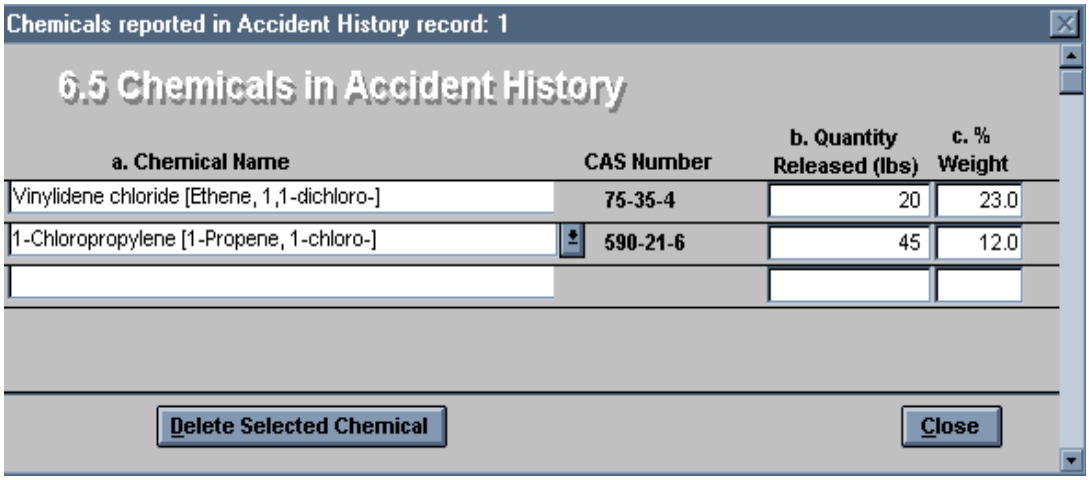


Exhibit 13. Chemicals in Accident History

To enter a chemical name for all regulated substances held above the threshold in the covered units (Sections 7 and 8):

1. Click the **Chemicals** button in Section 7 or Section 8. The Chemicals from Covered Process Dialog Box appears (Exhibit 14).

2. Enter the chemical name using the scroll bar to the right of the field.

3. To delete a chemical from the list of Chemicals from Covered Process, select a chemical, and click the **Delete Chemical** button.

4. Click the **Select All** button to select all the Prevention Program 3 (Section 7) or Prevention Program 2 (Section 8) chemicals and add them to the Chemicals from Covered Process.

5. Click the **Close** button to close the Chemicals from Covered Process Dialog Box.

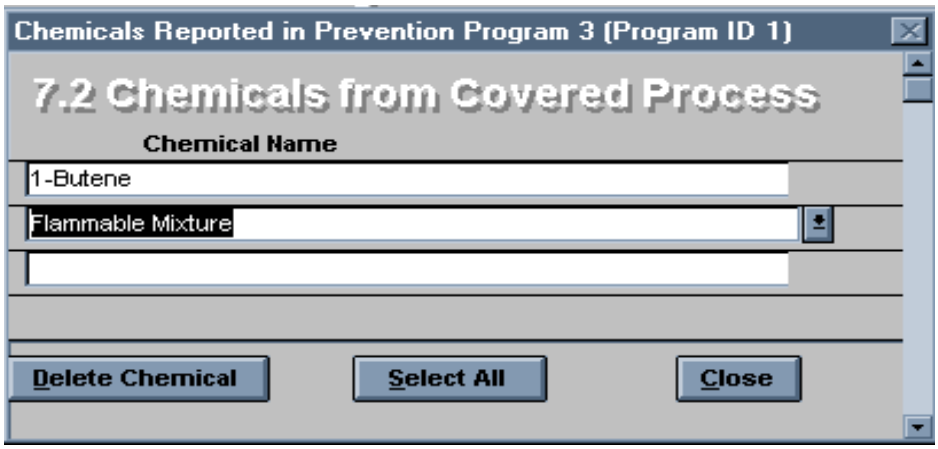


Exhibit 14. 7.2 Chemicals from Covered Process Dialog Box

Required data in Sections 1 through 8 can be claimed as Confidential Business Information (CBI) in accordance with CBI rules and regulations. RMP*Submit Help provides further information on RMP data that can be claimed as CBI and how to make a claim. To claim CBI:

1. Click the CBI check box to claim required data as CBI for that section (Exhibit 15). A warning message will appear that briefly states the conditions for claiming CBI. Click the "Don't display this message again" box to disable the warning message.

2. If claiming chemicals as CBI in the Registration Section (data element 1.17), check the CBI check box at the top right-hand corner of the dialog box. This adds CBI generic chemical categories to the chemical drop down list.

3. If claiming chemicals as CBI in Accident History (data element 6.5), check the CBI check box on the Section 6 Accident History form. This adds CBI generic chemical categories to the chemical drop down list.

4. If claiming the chemical quantity as CBI in the Registration Section (data element 1.17), check the Qty CBI box in the Process Chemicals subform and leave the quantity field blank. The Qty CBI check box will only be visible when the CBI check box in the Processes Dialog Box is displayed.

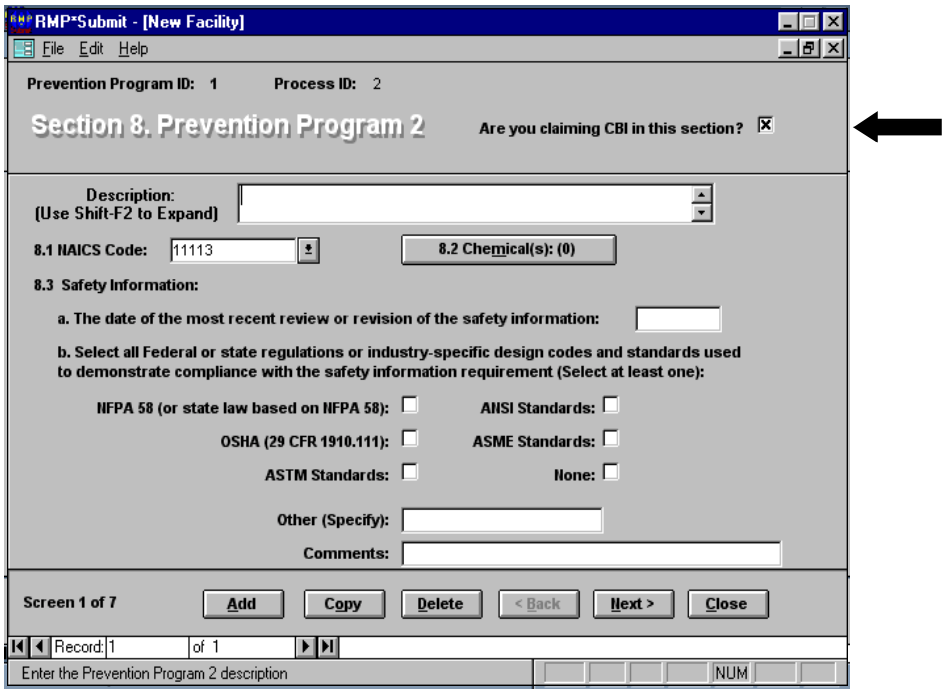


Exhibit 15. Claiming Confidential Business Information

To enter Executive Summary text:

1. Click the **Executive Summary** button from the Section 1 Registration Information Screen or select Executive Summary from the Sections menu. The Executive Summary Screen will appear.

2. Enter a brief description of your facility's risk management program. The text will wrap around to the next line as you type. To create a new line press **<Ctrl+Enter>**.

D.3.2 Checking RMP Data

To help ensure that your RMP is complete and accurate, RMP*Submit checks many (but not all) data fields as you enter data.

- If you skip an essential field, RMP*Submit prompts you to enter data before proceeding.

- If you enter a value outside the acceptable range of values, RMP*Submit prompts you to enter an acceptable value before proceeding.

- If you attempt to leave a record that contains blanks in required fields, RMP*Submit asks if you want to identify the required fields in the form that have not been filled in.

- RMP*Submit has an extensive validation function that checks an entire RMP and allows you to create a report of all errors.

To have RMP*Submit check your RMP data for errors:

1. Select an RMP and click the **Check** button from the List of Risk Management Plans Screen. If RMP*Submit finds any errors it will prompt you to view the error report.

2. The validation function will also be executed automatically each time you "Submit" an RMP as described in Section D.3.4.

D.3.3 Printing RMP Data

RMP*Submit provides the capability to print an entire RMP or selected parts of an RMP from within any section of the current RMP.

1. Click **Print** from the List of Risk Management Plans Screen or select **<File**, **Print>** from the Menu bar. The RMP Report Options Dialog Box will appear (Exhibit 16).

2. Click **Entire RMP** or select a section or subsection of the RMP to print.

3. Click the **Preview** button to view your RMP before printing. When you preview an RMP, each section is displayed as a separate report. You may print or close each report as appropriate.

4. Click the **Print** button to send the RMP directly to the printer without previewing it.

5. Click the **Cancel** button to return to the previous Data Entry screen.

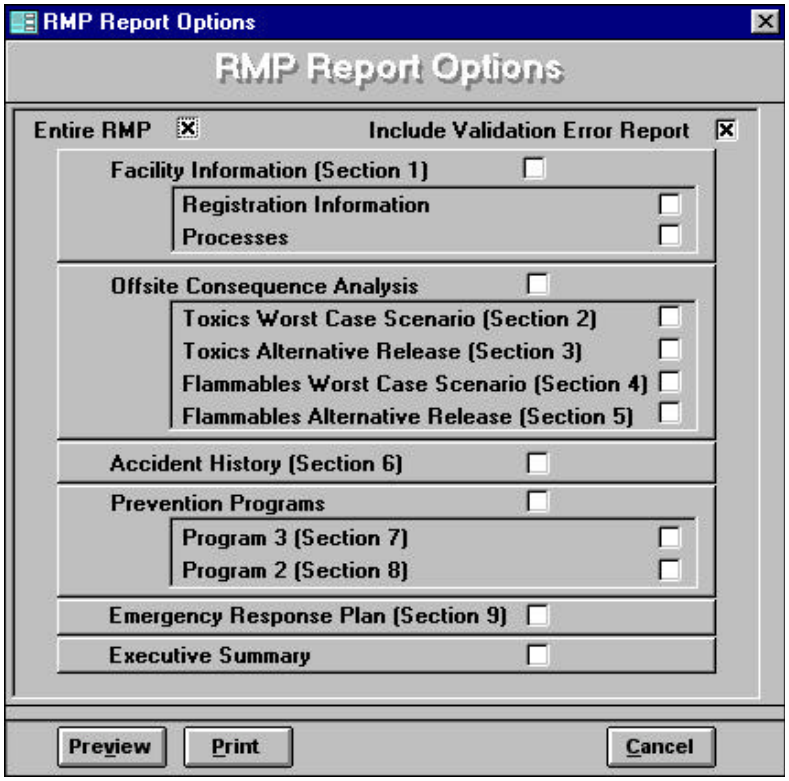


Exhibit 16. RMP Report Options

D.3.4 Submitting RMP Data

Once you have completed entering your RMP data, you can create a disk for submitting your RMP to EPA.

1. Insert a formatted 3.5-inch disk into the appropriate drive.

2. Select an RMP from the List of Risk Management Plans Screen and click the **Submit** button.

3. A message box will display, asking if this is your first submission, a correction or a re-submission. If you answer "Correction" or "Resubmission," RMP*Submit will check to make sure that you have entered your RMP Facility Identifier. See Chapter 5 for more information about submitting.

4. Next, RMP*Submit prompts you to enter an output drive letter (Exhibit 17).

5. Enter the drive where you want to save your RMP (Drive **A:** is the default), and click **OK**. For example, if your 3.5-inch disk drive is drive **B:**, you would enter “b”. Next, another message box will display that says, “RMP will be output to file a:\rmp.txt. Is diskette in Drive?” (**A:** represents the output drive you have chosen). Make sure that your disk is in the correct drive and click **OK**. Your RMP is output (saved) to your submission disk with the filename **rmp.txt**. The Submit function will automatically validate the selected RMP. If there are no critical errors, the RMP will be exported to a text file. You will also be asked if you would like to preview the error report described in Section 4.3.2. If critical errors are found during validation, the submission will be terminated. View the error report to see where errors exist in your RMP.

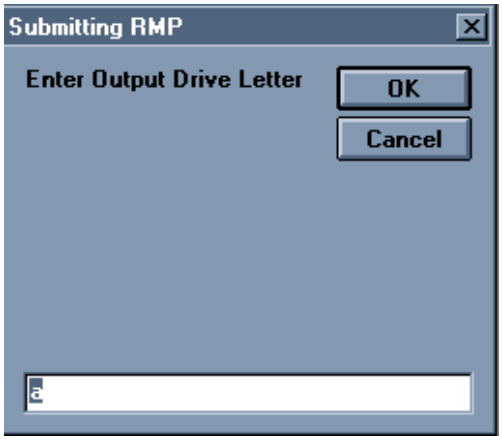


Exhibit 17. Submitting RMP

D.4 Import

You may have RMP data from another source that you want to import into RMP*Submit to utilize its validation functions. The data must be in an ASCII file formatted in accordance with the *SRMP ASCII Interface Control Document*.

1. Click the **Import** button from the Main Menu Screen. The Select File Dialog Box appears.
2. Select the drive, folder, and specific file name of the RMP to import into RMP*Submit.
3. If errors are detected in importing your text file, you will receive an error message.
4. Click **OK** to display the error message log for your RMP. The RMP Import Error Log Screen will display. Select **<File**, **Print>** to view or print the RMP Import Error Log.

2. DATA ELEMENT INSTRUCTIONS

EXECUTIVE SUMMARY

The executive summary must include a brief description of your facility's risk management program. You determine the length; it may be as short as two or three pages or, if you have many processes, it may need to be more lengthy. You should view the Executive Summary as an opportunity to communicate in your own words the nature of the risks posed by your facility to your community and to explain what you have done to minimize that risk. The summary can be an excellent vehicle to display the effort and resources your facility has put into its accident prevention program.

Your executive summary can not be claimed as CBI. Do not include any CBI data in your executive summary.

If your executive summary is short, it can be "cut" from the word processing program you are using and "pasted" into the text box on the Executive Summary screen. Alternatively, you may type the executive summary straight into the text box. To expand the visual size of the text box, press [shift-F2].

In order for RMP*Submit to be able to operate on a very low end computer (386, Windows 3.x), very long executive summaries (those over about 10 pages long) can not be cut and pasted into the text box on the Executive Summary screen. To report long executive summaries, you have 2 options:

> 1) **Attach your entire executive summary in a separate ASCII file:** While you are using your word processing program, save the executive summary as an ASCII Text file (most word processing program allow you to do this). Then, in RMP*Submit's Executive Summary screen, click on the box with the 3 dots (...) at the bottom of the screen to "browse" your system and locate the ASCII Text file. Select the ASCII Text file containing your executive summary, and RMP*Submit will store that filename. When you are ready to submit your RMP, choose "Submit" from the "List of Risk Management Plans" screen, and the executive summary file will be automatically stored on the submittal disk along with the rest of the RMP.
>
> 2) **Cut and paste part of the executive summary and attach the rest:** Enter part of your executive summary into the text box on the Executive Summary page in RMP*Submit by either cutting and pasting text or typing it in. Then, attach the rest of the executive summary in a separate ASCII Text file using the instructions in #1 above.

The Executive Summary must briefly describe the following elements:

The accidental release prevention and emergency response policies at your facility

Describe your facility's overall approach to chemical safety. You may want to include any corporate policies (if applicable) and an overview of senior management commitment to safety and implementation of safe procedures.

Your facility and the regulated substances handled

Provide a description of your facility so that the public has a clear picture of the facility, its processes, and products. Describe the primary activities at the facility (e.g., manufacturer of polyethylene, pulp mill, etc.) and the regulated substances used. In addition, you may want to mention the quantities of these substances handled or stored at your facility.

The worst-case release scenario(s) and the alternative release scenario(s)
Describe each of your release scenarios and indicate whether the release has offsite impact, if applicable. You may want to indicate whether you used the *OCA Guidance*, an industry-specific guidance, or conducted your own modeling.

For the worst-case, if your analysis considers administrative controls that limit the quantity released to below the maximum capacity of the largest vessel, you must identify both the amount of the reduction and the control mechanisms (e.g., "Written operating procedures and high-level alarms prevent more than 6,000 gallons from being present in the 10,000 gallon tank."). In addition, if you considered passive mitigation measures in your analysis, you must identify both the mitigation systems in use and their effect (e.g., "A concrete dike around the tank limits the exposed surface area of a pool and thus reduces the release rate to X."). You may also want to discuss any systems or procedures you have that make a worst-case release unlikely.

For the alternative scenarios, if you considered either active or passive mitigation measures in your analysis, you must identify both the mitigation systems in use and their effect (e.g., "An automatic water spray is expected to knock down approximately 50 percent of the vapor released from the end of the delivery pipeline."). You may also want to discuss why you selected the particular scenario.

The general accidental release prevention program and chemical-specific prevention steps
You may wish to mention the rules and regulations with which your facility complies, such as the OSHA PSM rule. You should also highlight practices that you believe are important to your prevention program. The steps you list may be either technological (e.g., backup systems) or procedural/managerial (e.g., improved maintenance or training).

The five-year accident history
Do not present accident history information in table form here; more details will be provided in the data elements. This should be a written summary; for example, "We have had five accidental releases of chlorine in the past five years; the largest release was 1,500 pounds. No one offsite was injured, but several houses were evacuated as a precautionary measure during the October 1995 and May 1996 releases."

The emergency response program
Briefly describe the elements of your response program such as coordination with local emergency responders, training received by personnel, drills conducted by your facility, public notification and alert systems, as appropriate.

Planned changes to improve safety
List any upcoming events such as training, installation of new mitigation or control equipment or technology, organizational changes, etc., that will improve safety at your facility.

SECTION 1: REGISTRATION

If you are covered by the Risk Management Program rule, you must complete the registration portion of the RMP even if you have only Program 1 processes. The registration consists of facility identification information like that you provide under the Emergency Planning and Community Right to Know Act (EPCRA) Tier I or II reports and Toxic Release Inventory (TRI) Form R reports.

1.1.a. Facility Name. Provide the name of your facility. The name must be specific to the site; if the site is part of a large corporation, the name may be the corporate name plus the location (for example ABC Chemicals - Hightown Plant).

1.1.b. Parent Company #1 Name. Your parent company is the corporation or other business entity that owns at least 50 percent of the voting stock of your company. If you are owned by a joint venture, enter the first of your two major owners here. If your company does not have a parent company, leave this data element blank.

1.1.c. Parent Company #2 Name. If you are owned by a joint venture, enter the name of the second major owner here.

1.2 EPA Facility Identifier. EPA is working toward streamlining facility reporting by creating a new EPA Facility ID for all facilities that report to EPA that would be used across all of EPA's program systems. Each facility will be assigned a unique, 12 character, identifier called the "EPA Facility ID"; this number will not be any of the ID numbers that you may already have. The RMP program is the first to adopt this ID for use by reporting facilities. The EPA Facility ID must be left blank for first-time submissions in June of 1999, and will be assigned to you after your first submission. It will be needed for all subsequent submissions and administrative changes. EPA will notify the facility after its first submission of its new EPA Facility ID number.

1.3. Other EPA Systems Facility Identifier. In EPA's efforts to streamline facility reporting, incoming facility information needs to be linked with existing facility information across different environmental programs. To help ensure your facility's RMP data is properly linked and that your facility does not receive multiple EPA Facility IDs, please enter one of the following Facility Identification numbers in the following priority order:

First, if you have a ***TRI (Toxic Release Inventory) ID*** number (15 characters), enter it here. If you know you have a TRI ID, but do not know what it is, you can find it by doing a search of the TRI database on the Internet at: **http://www.epa.gov/enviro/html/tris/tris_query_java.html** or calling the EPCRA Hotline at 800-535-0202.

Second, if you do not have a TRI ID, but report to EPA under another program and have a number referred to as a "FINDS" or Unique Identification Number (UIN), (these will be 12 characters), enter it here. If you know you have a "FINDS" or "UIN" number, but do not know what it is, you can find it by doing a search of EPA's Facility Identification Initiative (FII) database on the Internet at:
http://www.epa.gov/enviro/html/fii/fii_query.html

Third, use any one of the following numbers:
If your facility is covered by hazardous waste regulations under the Resource Conservation and Recovery Act (RCRA), enter your RCRIS Handler ID (12 characters). You can find your RCRIS ID on the Internet at: **http://www.epa.gov/enviro/html/rcris/rcris_query_java.html**.

If your facility is covered by regulations under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), enter your CERCLIS Site ID (7 characters). You can find your CERCLIS ID on the Internet at: **http://www.epa.gov/enviro/html/cerclis/cerclis_query.html**.

If your facility does not have an ID Number as described above, leave this data element blank.

1.4.a. Facility Dun and Bradstreet Number (DUNS). A Dun and Bradstreet Number (DUNS) is a nine-digit identification number that allows your facility to be cross-referenced to various business information. If you have a DUNS number, it should be available from your treasurer or financial officer. You can also obtain the number from your local Dun and Bradstreet office (check the telephone book White Pages). If you don't have a DUNS number, leave this data element blank.

1.4.b-c. Parent Company Dun & Bradstreet Number(s) (DUNS). Enter the DUNS number of your parent company(ies), if applicable. If you are owned by a joint venture, enter the numbers for your two major owners. If you do not have a parent company or your parent company does not have a DUNS number, leave this item blank.

1.5.a-e. Facility Location Address. Enter your facility *location* address, including the street, city, state, and zip code (including the 4 digit extension, if applicable) of your facility. This is the location where regulated substances are present. The city should be the local legal jurisdiction, for example, a township or village. Use local street and road designations, not post office or rural box numbers. This location may not represent the **mailing address.** EPA will not attempt to mail correspondence to this address. All correspondence will be mailed to the address provided at 1.6.c-h. If your location and mailing address are the same, then you will fill in the same address at 1.6.c-h.

1.5.f. Facility County. Enter the county in which the facility is located.

1.5.g-h. Facility Latitude and Longitude. Enter the latitudinal and longitudinal coordinates of your facility in ***"degrees, minutes, and seconds."*** Enter both latitude and longitude to the nearest second (at least). Instructions on how to determine these coordinates can be found in Appendix F.

Enter only numerical data. Do not preface numbers with letters such as N or W to denote the hemisphere. For RMP*Submit, the default for the hemisphere is "+" for east and north. However because "+" is assumed by the system, you must leave that space blank for east and north. For west and south, enter a negative, "-," as the first character. Enter both latitude and longitude to the nearest second.

Be careful not to reverse your latitude and longitude coordinates. Latitude in the 48 contiguous states ranges from 25° to 49°, while longitude ranges from 72° to 124°.

The following table illustrates the acceptable response for a particular latitude and longitude value.

	Latitude	Longitude
Boston	42° 17' 55"	- 71° 06' 03"
Chicago	41° 53' 49"	- 87° 42' 11"
Oakland	37° 47' 50"	- 122° 18' 08"
Honolulu	21° 18' 00"	- 157° 54' 00"

It is important to provide accurate latitude and longitude values in your RMP. RMP*Submit will help you by letting you know if the value that you enter falls outside of the range of values for the county in which your facility is located.

1.5.i. Method for determining Latitude and Longitude. You also must indicate the method that you used to determine your latitude and longitude data. The table below lists the codes to be used for this element and provides a brief description of each method.

The most common methods for determining Latitude and Longitude are I1 (**I**nterpolation-Map), and I4 (**I**nterpolation-Digital Map Source). Use I1 if you obtained your latitude and longitude from a paper map. Use I4 if you obtained your latitude and longitude from a computer-based geographic information system (GIS), such as LandView.

Code	Description of Method
A1	Address Matching -House Number: derived from a point corresponding to a house or building number along a street segment.
A2	Address Matching - Block Face: derived from a calculated midpoint of one side of a street segment with regard to odd or even addresses.
A3	Address Matching - Street Centerline: derived from a calculated midpoint and centerpoint of a street segment.
A4	Address Matching - Nearest Intersection: derived from the intersection closest to a house or building number.
A5	Address Matching – Primary Name: derived from the primary name of a township or city.
A6	Address Matching – Digitized: derived from hands-on use of computer-based mapping tools.
AO	Address Matching - Other: derived through the use of non-specific matching techniques.
C1	Census Block - 1990 - Centroid: derived from the calculated centerpoint of a 1990 Census Block as defined by the U.S. Bureau of the Census
C2	Census Block/Group - 1990 - Centroid: derived from the calculated centerpoint of a 1990 Census Block/Group as defined by the U.S. Bureau of the Census
C3	Census Block Tract - 1990 - Centroid: derived from the calculated centerpoint of a 1990 Census Tract as defined by the U.S. Bureau of the Census.
CO	Census - Other: derived from other Census-defined areas, such as Metropolitan Statistical Areas (MSAs).
G1	Global Positioning System (GPS) Carrier Phase Static Relative Positioning Technique: derived through the use of a GPS device employing Carrier Static Relative Positioning Technique.
G2	GPS Carrier Phase Kinematic Relative Positioning Technique: derived through the use of a GPS device employing Phase Kinematic Relative Positioning Technique.
G3	GPS Code Measurements (Pseudo Range) Differentially Corrected: derived through the use of a GPS device where measurements have been corrected for error based on the existence of known base stations relative to the study area.
G4	GPS Code Measurements (Pseudo Range) Precise Positioning Service: derived through the use of a GPS device employing real-time precise positioning techniques.
G5	GPS Code Measurements (Pseudo Range) Standard Positioning Service SA OFF: derived through the use of a GPS device when the Department of Defense Selective Ability was turned off.
G6	GPS Code Measurements (Pseudo Range) Standard Positioning Service SA ON: derived through the use of a GPS device when the Department of Defense Selective Ability was turned on.
G7	GPS Code Measurements (Pseudo Range) Standard Positioning Service Corrected using Canadian Active Control System: derived through the use of a GPS device employing the Canadian Active Control System.
GO	GPS-Other/ Unspecified: derived through the use of an unspecified GPS device.
I1	Interpolation – Map: derived from a paper or other non-digital map
I2	Interpolation – Photo: derived from an aerial photograph
I3	Interpolation – Satellite: derived from a satellite image.

I4	Interpolation - Digital map source (TIGER): derived from a digital map, mapping software or mapping tool.
I5	Interpolation - SPOT: derived from a SPOT image.
I6	Interpolation - MSS (Multi-spectral Scanner): derived from a MSS image
I7	Interpolation - TM (Thematic Mapper): derived from a thematic mapper
IO	Interpolation - Other
L1	Loran C: derived from the use of a Loran-C positioning device
P1	Public Land Survey-Section: a coordinate pair corresponding to a point from a public land survey.
P2	Public Land Survey-Quarter Section: a coordinate pair corresponding to a point from a public land survey
P3	Public Land Survey-Eighth Section: a coordinate pair corresponding to a point from a public land survey.
P4	Public Land Survey-Sixteenth Section: a coordinate pair corresponding to a point from a public land survey.
P5	Public Land Survey-Footing: a coordinate pair corresponding to a point from a public land survey.
S1	Classical Surveying Techniques: derived from traditional surveying techniques associated with construction activities.
Z1	ZIP Code-Centroid: derived from the calculated center of a U.S. postal ZIP code.
Z2	ZIP+2 Code-Centroid: derived from an averaging of multiple street segments. Approximately the size of a Census Block Group.
Z4	ZIP+4 Code-Centroid: derived from a calculated midpoint of one side of a street segment with regard to odd or even house or building numbers.
OT	Other
UN	Unknown

1.5.j. Description of location identified by Latitude and Longitude. You must also describe the exact location your latitude and longitude values represent. The table below lists the codes to be used for this element.

The most common Latitude and Longitude location descriptions are PG (Plant Entrance - General) and CE (Center of Facility).

Code	Description of Location
AB	Administrative Building: a building, structure, or portion thereof that houses the administrative functions of a facility as opposed to production or manufacturing activities.
AE	Atmospheric Emissions Treatment Unit: equipment installed for the express purpose of treating chemical emissions prior to their release into the atmosphere.
AM	Air Monitoring Station: equipment installed at a predetermined location for the automatic, manual, or periodic collection of environmental air samples.
AS	Air Release Stack: a free-standing vertical structure constructed for the conveyance and release of chemical emissions into the air.
AV	Air Release Vent: a horizontal structure constructed for the release of chemical emissions into the air, typically from the side or roof of a building.
CE	Center of Facility: a representative center point within the boundary of a facility.
FC	Facility Centroid: the calculated center of a contiguous facility.
IP	Intake Pipe: a pipe or intake opening constructed for the collection and conveyance of water.
LC	Loading Area Centroid: the calculated center of a portion of a facility associated with loading activities.
LF	Loading Facility: the portion of a facility associated with loading and/or transshipment activities.
LW	Liquid Waste Treatment Unit: Equipment installed for the express purpose of treating chemical emissions prior to their release to water, publicly owned treatment works (POTW) or off-site transfer.
NE	NE Corner of Land Parcel: the northeast most corner or boundary of a land parcel.
NW	NW Corner of Land Parcel: the northwest most corner or boundary of a land parcel.
OT	Other: see descriptive comment field.
PC	Process Unit Area Centroid: the calculated center of a portion of a facility associated with processing and/or manufacturing activities.
PF	Plant Entrance (Freight): the entrance to a facility associated with transshipment activities.

PG Plant Entrance (General): the front gate or general entrance of a facility.
PP Plant Entrance (Personnel): the entrance to a facility associated with employees.
PU Process Unit: the portion of a facility associated with processing and/or manufacturing activities.
SD Solid Waste Treatment/Disposal Unit: the portion of a facility associated with the treatment and/or disposal of solid waste.
SE SE Corner of Land Parcel: the southeast most corner or boundary of a land parcel.
SP Lagoon or Settling Pond: the portion of a facility designed to accommodate sedimentation or settling of chemical by-products necessitated by the manufacture, production, or use of chemicals.
SS Solid Waste Storage Area: the portion of a facility associated with the storage of solid waste.
ST Storage Tank: a receptacle or chamber used for storing bulk fuels or chemicals.
SW SW Corner of Land Parcel: the southwest most corner or boundary of a land parcel.
WA Wellhead Protection Area: an area at the earth's surface buffering a wellhead.
WL Well: a shaft drilled in the earth for purposes such as obtaining subsurface drinking water, or collecting groundwater monitoring samples.
WM Water Monitoring Station: a location or study area for the automatic, manual, or periodic collection of water samples.
WR Pipe Release to Water: the point at which a pipe constructed for the conveyance and release of water-borne chemical emissions reaches a water body.
UN Unknown

1.6.a. Owner or Operator Name. Enter the name of the legal owner or operator of the facility (person, company, association, or government agency).

1.6.b. Owner or Operator Phone. Enter the owner or operator's business phone number, including area code.

1.6.c-h. Owner or Operator Mailing Address. Enter the owner or operator's business mailing address, including street or P.O. or rural box, city, state, and zip code (including 4 digit extension, if applicable). The city should be the local legal jurisdiction, for example, a township or village. In this instance, you should use post office and rural box numbers, if appropriate. This is the address that all correspondence will be mailed to.

1.7.a. Name of person responsible for RMP (part 68) implementation
1.7.b. Title of person or position responsible for RMP (part 68) implementation
Enter the name and title of the person or position with overall responsibility for the risk management program at your site. Although the individual's name is not required, the title of the person or the position that has this responsibility is required.

1.8. Emergency Contact.
1.8.a-b. Name and Title. Enter the name and title or job classification of the person designated as the emergency contact. If you have a toxic regulated substance, you already may have designated a facility emergency coordinator in your notification to your Local Emergency Planning Committee (LEPC) under EPCRA section 312. If you have more than one contact person, provide just one name for this entry. You may want to list the others in your Executive Summary.

Your emergency contact should be:
✦ An employee or contract employee of your facility;
✦ Knowledgeable about your site;
✦ Aware of all emergency plans; and
✦ Able to provide emergency response support or direct response personnel to provide support.

1.8.c. Phone Number. Enter the phone number, including area code, where the emergency contact can be reached during normal business hours. You most likely will enter the facility phone number here. If your facility does not have a phone number, you may enter the business phone number of the emergency contact, the phone number of a dispatcher, or the customer service phone number.

1.8.d-e. 24-Hour Phone Number & Extension or Pin Number. Enter the phone number, including area code, where the emergency contact can be reached during non-working hours. You most likely will enter the emergency contact's 24-hour "beeper" number. There is a space for an extension or pin number, if applicable.

1.9.a. Facility or Parent Company E-Mail Address (Optional). You may choose to provide an e-mail address to which inquiries from the public could be sent. The e-mail address could be for the person who developed your RMP or your public liaison office.

1.9.b. Facility Public Contact Phone Number (Optional). You may choose to provide a phone number for public inquiries. It could be the phone number of the person who developed your RMP or of your public liaison office.

1.9.c. Facility or Parent Company WWW Homepage Address (Optional). You may choose to provide an Internet address where the public can obtain more details on your accident prevention program, offsite consequence analysis, or other facility or corporate information. In RMP*Info, your homepage address will be hot-linked to your homepage, meaning a user can just click on this data element and automatically go to your homepage.

1.10. LEPC (Optional). Enter the name of your Local Emergency Planning Committee (LEPC) for your planning district. LEPCs were created to do local planning under the Emergency Planning and Community Right to Know Act (EPCRA) of 1986. In RMP*Submit, you will select your LEPC's name from a pick list based on the facility county and zip code information that you have provided. If you do not know your LEPC's name, you can call your local fire department or refer to the LEPC Database on the Internet at **http://www.rtk.net/www/data/lepc.html**. This data element will help your LEPC find the facilities in its jurisdiction when searching in RMP*Info.

1.11. Number of full-time employees on site. Enter the number of full-time equivalent employees who work at your facility. To determine the number of full-time equivalent employees at your facility, add together the fractions of full-time work performed by part-time or seasonal employees and round to the nearest whole number (see example below). Do not include contract employees. If your facility is un-manned or is only staffed by part-time employees, you should briefly explain these circumstances in the executive summary.

For example, suppose a facility has 10 regular full-time employees, two part-time employees that each work 30 hours per week, and seven seasonal employees that each work 40 hours per week for three months of the year. You should count the two part-time employees as 3/4 of an employee each because they work 3/4 that of a full-time employee and the seven seasonal employees as a 1/4 of a full-time employee each, for the same reason. As shown in the table below you get 13.25, which you should round to the nearest whole number. You should enter "13" for the number of full-time employees.

EXAMPLE 4

Type of Employee	Number of Employees Times the Fraction of a Full-Time Employee	Full-Time Equivalent Employees
Full-time (40 Hours)	10 x 1	10
Part-Time (30 hours)	2 x 0.75	1.5
Seasonal (3 months/year)	7 x 0.25	1.75
Total		**13.25 (rounded to 13)**

1.12.a. Covered by OSHA's Process Safety Management (PSM) Standard. This data element applies to your facility as a whole and is not a process-by-process determination. Therefore, if one process at your facility is subject to the OSHA PSM standard, select this data element, even if the PSM process is not covered by this rule.

1.12.b. Covered by EPCRA section 302. If you have on site more than a threshold quantity of a substance that is an extremely hazardous substance (EHS), you are subject to EPCRA §302 notification requirements (a one time notification to the State Emergency Response Commission (SERC) and LEPC that you have one of the listed EHSs on site). If you are subject to those requirements, check this element, regardless of whether the EHS is an RMP regulated substance or is held in a process below the 112(r) threshold quantity. Two quick hints:

(1) If you are subject to the RMP rule because you have more than a threshold quantity of a **toxic** substance listed under Section 112(r), you are subject to EPCRA section 302 and must select this data element.

(2) If you are subject to the RMP rule only as a result of flammable substances, you are not subject to EPCRA section 302, and you can leave this data element blank.

1.12.c. CAA Title V Air Operating Permit ID. Title V of the Clean Air Act requires major sources of air pollution to obtain permits. If your facility has been issued a Title V operating permit by a federal, state, or local permitting agency, check this element <u>and enter your permit number</u>.

1.13. OSHA Star or Merit Ranking (Optional). Check the box if your facility has received a Star or Merit Ranking under OSHA's Voluntary Protection Program and thus is exempt from audits conducted pursuant to § 68.220(b)(2) and (7).

1.14. Last Safety Inspection (by an External Agency) Date
1.15. Last Safety Inspection Performed by an External Agency (select one)
Record the date of your last safety inspection by an external agency here and select the agency (or agencies) that performed the inspection. Choose from the following: OSHA; State occupational safety

organization; EPA; State environmental agency; fire department; or "Never had one." RMP*Submit will also let you enter your own answer. If your last safety inspection was a joint inspection, enter multiple agencies by typing them into the field.

1.16. Will this RMP involve Predictive Filing?

Predictive Filing is an RMP filing option that allows your facility to submit an RMP which includes regulated substances which may not actually be present at the facility at the time the RMP is submitted. This option is intended to assist facilities such as chemical warehouses, chemical distributors, batch processors and the like whose operations involve highly variable types and quantities of regulated substances but who are able to forecast their inventory with some degree of accuracy. Under 40 CFR §68.190, a facility is required to update and re-submit its RMP no later than the date on which a new regulated substance is first present in a covered process above a threshold quantity. By using Predictive Filing, you will not be required to update and re-submit your RMP when you receive a new regulated substance if that substance was included in your latest RMP submission (as long as you receive it in a quantity that does not trigger a revised offsite consequence analysis as provided in 40 CFR §68.36).

If you use Predictive Filing, you should implement your Risk Management Program and prepare your RMP in exactly the same way as if all of the substances included in the RMP were actually present. This means that you must meet all rule requirements for each regulated substance for which you file, whether or not that substance is actually present on site at the time you submit your RMP. Depending on the substances for which you file, this may require you to perform additional worst-case and alternative-case scenarios and to implement additional prevention program elements. Note that if your facility uses this option you must still update and resubmit your RMP if you receive a new regulated substance which was not included in your latest RMP. Your facility must also continue to comply with the other update requirements stated in 40 CFR §68.190.

If your facility uses Predictive Filing, the RMP*Info data for your facility on the Internet will indicate that your facility has filed a predictive RMP. This will inform the user that some of the chemicals in your RMP may not actually be present on site, but will not indicate which specific chemicals are on site at any given time. Therefore, you may receive more frequent questions from the public, local officials, or implementing agencies about your actual chemical inventory. EPA encourages you to engage in more frequent dialogue with these parties, and in particular with local emergency planners, emergency responders, and community officials to update them on your current inventory of regulated substances.

1.17. Process-Specific Information

In this section of the registration, answer five questions for **EACH** covered process at your facility. A few examples follow the descriptions of the data elements below.

Process ID #. This field is provided to help you (if you need to) track multiple processes as you fill out the remaining sections of your RMP. In RMP*Submit, this number is automatically generated.

Process Description. This description is optional. It is provided to help you (if you need to) track multiple processes as you fill out the remaining sections of your RMP.

1.17.a. Program Level. The rule imposes different requirements on processes based on the potential for public impacts and the level of effort needed to prevent accidents. EPA has set three levels of requirements that apply to covered processes:

Program Eligibility Criteria

Program 1	Program 2	Program 3 (unless eligible for Program 1)
No offsite accident history, No public receptors in worst-case circle, and Emergency response coordinated with local responders.	The process is not eligible for Program 1 or subject to Program 3.	Process is subject to OSHA PSM, or Process is in NAICS code 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532.

If you can qualify a process for Program 1, it is in your best interests to do so, even if the process is already subject to OSHA PSM. For Program 1 processes, the implementing agency will inspect and enforce only on compliance with the minimal Program 1 requirements. If you assign a process to Program 2 or 3 when it might qualify for Program 1, the implementing agency will inspect or enforce for compliance with all the requirements of the higher program levels. If, however, you are already in compliance with the prevention elements of Program 2 or Program 3, you may want to use the RMP to inform the community of your prevention efforts.

KEY POINTS TO REMEMBER

In determining program levels for your process(es), keep in mind the following:

(1) **The program levels apply to individual processes** and generally indicate the risk management measures necessary to comply with this regulation for the process, not the facility as a whole. The eligibility of one process for a program level does not influence the eligibility of other covered processes for other program levels.

(2) **Any process can be eligible for Program 1**, even if it is subject to OSHA PSM or is in one of the NAICS codes subject to Program 3.

(3) **Program 2 is the default program level**. There are no "standard criteria" for Program 2. Any process that does not meet the eligibility criteria for either Programs 1 or 3 is subject to the requirements for Program 2.

Refer to Chapter 2 of the *General Guidance for Risk Management Programs* for more information on determining the Program levels of your processes. Once you determine the Program level, simply enter 1, 2, or 3 for this data element.

1.17.b. NAICS Code(s). The North American Industry Classification System (NAICS) categorizes businesses by fitting them into descriptive categories that correspond to five-digit or six-digit codes. NAICS codes have replaced SIC codes, which you may be familiar with. For example, pulp mills are NAICS code 32211, paper mills are 322121 or 322122, and metal platers are 332813. The first three

digits of a five or six-digit code define a major business sector and the last two or three digits indicate an establishment's specialty within the major sector.

For this data element you should provide the NAICS code that most closely corresponds to the process; it will not necessarily be the same NAICS code for you facility as a whole. For example, if you manufacture chlorine, then process it to make cleaners, the chlorine manufacturing is in NAICS code 325818 and the cleaner manufacturing is in NAICS code 325612. If your chlorine manufacturing vessel is connected by pipes to, or co-located with, the cleaner manufacturing vessel, they are considered one "process" by the RMP rule. In such a case, you should enter the NAICS code that describes the primary activity of the "process." In the example above, if the chlorine and cleaner vessels are interconnected, the primary activity of the "process" is manufacturing cleaner, since that is the ultimate product of the "process." You may also enter additional NAICS codes if you wish to identify other aspects of a process not captured by the NAICS codes for the primary activity. In the example above, you could also enter NAICS code 325181 for chlorine manufacturing, if you so desire. If you do enter multiple NAICS codes, be sure to enter your primary NAICS code first.

You should determine the NAICS codes for your processes based on your activities on site using the 1997 *North American Industry Classification System Manual.* Appendix B of the *General Guidance for Risk Management Programs* provides the NAICS codes for the industry sectors most likely to be subject to 40 CFR Part 68. RMP*Submit also contains the full list. You may also access the full list online at ***www.census.gov/epcd/www/naics.html*** and a cross-walk between SIC codes and NAICS codes at ***http://www.census.gov/epcd/www/naicstab.htm***.

To simplify your search, a list of the three-digit NAICS codes is presented in Appendix J.

Below is the conversion from SIC codes to NAICS codes for the Program 3 NAICS codes. Note there are 2 duplicates listed in the NAICS column because of the conversion. The 9 SIC codes translate into a total of 10 SIC codes.

SIC	NAICS	Sector
2812	325181	Alkalies and chlorine
2821	325211	Plastics and resins
2873	325311	Nitrogen fertilizer
2879	32532	Pesticide and other agricultural chemicals
2911	32411	Petroleum refineries
2611	32211	Pulp mills only
2819	325188	All other basic inorganic chemical manufacturing
2865	32511	Aromatics have been combined with aliphatics from 2869 to form the new petrochemical manufacturing
	325192	Other covers the cyclic crude and intermediate manufacturing
2869	32511	Aliphatics, joined with aromatics in petrochemical manufacturing;
	325188	Carbon bisulfide, moved to "All other basic inorganic chemical manufacturing" (covered from old 2819);
	325199	Other, moved to "All other basic organic chemical manufacturing."

1.17.c.1. Chemical Name. For each covered process, provide the names of all regulated substances held above the threshold. Many regulated substances have synonyms; however, you must enter the name of the regulated substance as it appears in § 68.130. If you have a NFPA-4 flammable mixture containing regulated flammables, you may list it as a "flammable mixture." List all of the regulated substances contained in the mixture; however, only report the quantity of the entire mixture, not the individual substances. RMP*Submit contains a pick list of all regulated substances.

1.17.c.2. CAS Number. Provide the Chemical Abstracts Service (CAS) registry number for each corresponding chemical name in 1.17.c.1 above. CAS numbers are listed in 40 CFR § 68.130 and in EPA's *General Guidance for Risk Management Programs* . RMP*Submit will automatically generate the CAS # based on the chemical name chosen. Because there is no CAS # for flammable mixtures, leave this field blank. RMP*Submit will assign a "dummy" CAS number of all zeros for flammable mixtures.

1.17.c.3. Quantity. For each chemical reported in 1.17.c.1, estimate the maximum quantity (in pounds) held in the covered process at any one time during the calendar year to two significant digits. For example:

5,333 pounds	should be reported as...	5,300 pounds
107,899 pounds	should be reported as...	110,000 pounds
128,000 pounds	should be reported as...	130,000 pounds

Can I use Maximum Quantity On-Site Data from my EPCRA Tier II Reports?

Not directly. EPCRA Tier II reports require maximum quantity on-site in specified ranges. The RMP registration asks for the maximum quantity in a process. Therefore, if your facility has several covered processes containing the same regulated substance above the threshold, estimate on a process-by-process basis the maximum quantity of the regulated substance in each process.

You may be able to use raw Tier II data to estimate the quantity of a regulated substance in a process. It is likely that in preparing your Tier II reports you estimated the quantity of a regulated substance in each process or building and then added the quantities together to estimate the total maximum on-site. Therefore, you can take the estimates you used to calculate your Tier II ranges for your RMP registration.

How do I Report Maximum Quantity in a Process for Mixtures or Trade Name Products?

Toxics. If the regulated toxic substance present in a process is part of a mixture or trade name product, determine the maximum quantity of the mixture or trade name product and then calculate the weight percent of the regulated toxic substance to report for quantity. **Do not include the weight of the entire mixture or trade name product.**

Flammables. If the regulated flammable substance is part of the mixture and the mixture meets the criteria of NFPA-4, report the weight of the mixture.

EXAMPLE 2

Suppose you have 21,365 pounds of ammonia in a covered process classified as other basic inorganic chemicals (NAICS code 32518) and do not have ammonia in any other covered processes. Report your ammonia maximum as:

Process Number:	1		
Process Description:	Basic Inorganic Chemicals		
1.17.a. Program Level:	2		
1.17.b. NAICS Code(s):	32518		
1.17.c. Chemical	**1.17.c.1. Name:**	**1.17.c.2. CAS #:**	**1.17.c.3. Quantity (lbs.):**
	Ammonia	7664-41-7	21,000

Now suppose that in addition to the 21,365 pounds, you also have 25,600 pounds of ammonia in another covered process classified as nitrogenous fertilizers (NAICS code 325311). In this case, report a second process as:

Process Number:	2		
Process Description:	Nitrogenous fertilizer		
1.17.a. Program Level:	2		
1.17.b. NAICS Code(s):	325311		
1.17.c. Chemical	**1.17.c.1. Name:**	**1.17.c.2. CAS #:**	**1.17.c.3. Quantity (lbs.):**
	Ammonia	7664-41-7	26,000

EXAMPLE 3

You received one shipment of a nitric acid solution last year that filled your 5,000-gallon storage tank. You know that the solution contains 95% nitric acid, which is a regulated chemical with a threshold quantity of 5,000 pounds.

First, convert gallons to pounds:
The density of 95% nitric acid is about 12 pounds per gallon, so you calculate the total weight of solution by multiplying 5,000 gallons by 12 to get 60,000 pounds.

Then, calculate the portion of the solution attributable to the regulated toxic substance:
To calculate the weight of nitric acid, you multiply 60,000 pounds by 0.95 to get 57,000 pounds.

Report the nitric acid in this process as follows:

Process Number:	3		
Process Description:	Storage - nitric acid		
1.17.a. Program Level:	2		
1.17.b. NAICS Code(s):	325311		
1.17.c. Chemical	**1.17.c.1. Name:**	**1.17.c.2. CAS #:**	**1.17.c.3. Quantity (lbs.):**
	Nitric Acid	7697-37-2	57,000

E. OVERVIEW OF THE RMP SECTIONS ON OFFSITE CONSEQUENCE ANALYSIS (OCA) (SECTIONS 2-5)

You must submit data on:

1. A **worst-case release scenario** analysis for all covered processes as follows:

   Report one worst-case release scenario for each Program 1 process. Program 1 processes must have no public receptors within the distance to the endpoint in the worst-case analysis.

   If your facility has Program 2 or Program 3 processes, provide information on one worst-case release scenario representing *all* toxic regulated substances present above the threshold quantity, *and* one worst-case release scenario representing *all* flammable regulated substances present above the threshold quantity. You may also need to submit an additional worst-case scenario for either hazard class (i.e., toxic or flammable), if a worst-case release from elsewhere at your facility would potentially affect a different set of public receptors than those affected by your initial worst-case scenario(s).

2. An **alternative release scenario**, for Program 2 and Program 3 processes as follows:

   Alternative release scenarios should be those that will reach an endpoint offsite, unless no such scenario exists.

   Present one alternative release scenario for ***each*** regulated toxic substance held above the threshold quantity, including the substance considered in the worst-case analysis.

   Present one alternative release scenario to represent ***all*** flammable substances held above the threshold quantity.

You may include one graphic (map or diagram) in electronic format for each release scenario that you report, but it is not required.

Using a flammable mixture for your OCA: You may have registered a flammable mixture for a process, even if the entire flammable mixture does not ever occur together in one vessel in the process. When reporting the OCA, choose the flammable mixture from the registration section, but do the modeling based on the specific components of the flammable mixture that are contained in the vessel that you are modeling for the OCA.

Refer to Chapter 4 of the *General Guidance for Risk Management Programs* for more details on the requirements of the Offsite Consequence Analysis.

SECTION 2 TOXICS: WORST-CASE
Complete this section for each toxic worst-case scenario you report.

2.1.a. Chemical name. Enter the name of the regulated toxic chemical you evaluated in the worst-case scenario.

2.1.b. Percent weight of chemical (if in a mixture). If your worst-case scenario involves the release of a mixture containing a regulated substance, enter the percentage weight of the regulated substance in the mixture. Leave blank if it is not a mixture.

2.2. Physical state. Select the physical state of the chemical in the vessel that you are modeling.

a. Gas.
b. Liquid.
c. Gas liquified by pressure.
d. Gas liquified by refrigeration.

2.3. Model used (select one). Select the source of your results for your worst-case release analysis or enter another model name in "Other":

a. EPA's *OCA Guidance* Reference Tables or Equations
b. EPA's *RMP Guidance for Ammonia Refrigeration* Reference Tables or Equations
d. EPA's *RMP Guidance for Waste Water Treatment Plants* Reference Tables or Equations
e. EPA's *RMP Guidance for Warehouses* Reference Tables or Equations
f. EPA's *RMP Guidance for Chemical Distributors* Reference Tables or Equations
g. EPA's RMP*Comp™
h. Areal Locations of Hazardous Atmospheres (ALOHA®)
z. Other model (specify)

2.4. Scenario. Select one of the following which describes your worst-case release scenario.

a. Gas release. A release of the substance in a vapor state.
b. Liquid spill and vaporization. A release of the substance in a liquid state with subsequent vaporization.

2.5. Quantity released (lbs). Enter the quantity of toxic chemical you used for your worst-case scenario analysis in pounds to 2 significant digits. This is the total amount that would be lost from a vessel or pipeline, even if the release location was inside a building or into other containment. The "release rate" or the rate at which the chemical actually gets into the outside air for the downwind dispersion analysis, is reported in 2.6 below. See Chapter 2 on Determining Worst-Case Scenarios in the *RMP Offsite Consequence Analysis Guidance* for more details. Here's how to report the quantity to 2 significant digits:

5,333 pounds	should be reported as...	5,300 pounds
107,899 pounds	should be reported as...	110,000 pounds

If you have less than 1 pound released, round up to 1 pound. You may want to clarify that in your Executive Summary.

2.6. Release rate (lbs/minute). Indicate the rate of release to the outside air in pounds per minute to 1 significant digit. For example:

4.3 pounds	should be reported as...	4 pounds
19 pounds	should be reported as...	20 pounds

For gases, a gas liquefied by pressurization alone, or a gas liquefied by refrigeration where the released refrigerated liquid forms a pool of 1 cm or less in depth, the release rate should be the total quantity released divided by 10 minutes and multiplied by the appropriate mitigation factor if a mitigated release.

The worst-case release scenario for liquid substances assumes that the liquid is instantaneously spilled on the ground or other surface followed by volatilization into the air. For the release of a liquid or a gas liquefied by refrigeration where the refrigerated liquid forms a pool deeper than 1 cm, the release rate to the air should be the rate of volatilization based on the properties of the substance and size of the liquid pool formed by the released substance, multiplied by the appropriate release mitigation factor if a mitigated release.

2.7. Release duration (minutes). Indicate the length of time in minutes to the nearest 10 minutes for the entire quantity released from the vessel, pipeline, or other source to be released to the outside air.

For gases, a gas liquified by pressurization alone, or a gas liquified by refrigeration where the released refrigerated liquid forms a pool of 1 cm or less in depth, you should assume that the release duration is 10 minutes.

For a liquid or a gas liquified by refrigeration where the released refrigerated liquid forms a pool deeper than 1 cm, the release duration should be the time required for a pool formed by the released substance to completely vaporize.

Although in some cases it may take longer than 60 minutes for the pool to completely volatilize, most dispersion models use the release rate and calculate the maximum downwind dispersion distance within 60 minutes; therefore, you may enter 60 minutes for your duration even if the duration from your modeling is longer than 60 minutes. You can also enter the exact duration from your modeling up to 9999 minutes.

2.8. Wind speed (meters/second). This value has been set by EPA at 1.5 meters per second, unless you can demonstrate that local meteorological data applicable to your facility show a higher minimum wind speed at all times during the last three years. If you can demonstrate higher minimums existed, these minimums may be used. Provide the wind speed in meters per second.

2.9. Atmospheric Stability Class. This value has been set by EPA at "F" stability class, unless you can demonstrate that local meteorological data applicable to your facility show a less stable atmosphere at all times during the last three years. If you can demonstrate less stable conditions existed, you may use the appropriate stability class.

2.10. Topography (select one). Indicate whether the local topography is urban or rural. Urban means that there are many obstacles in the immediate area; obstacles include buildings or trees. Rural means that the terrain is generally flat and unobstructed in the immediate area.

2.11. Distance to endpoint (miles). Indicate the distance to the endpoint in miles to 2 significant digits, using the endpoint specified for the chemical in 40 CFR Part 68, Appendix A. Convert your modeling results into miles by dividing the distance in feet by 5280 or yards by 1760. Refer to the following to determine 2 significant digits:

.397 miles	should be reported as...	.40 miles
9.345 miles	should be reported as...	9.3 miles
20.764 miles	should be reported as...	21 miles

2.12. Residential population within distance to endpoint. Estimate the population within the circle with a center at the point of the release and a radius determined by the distance to the endpoint to two significant digits (e.g., 5,500 people rather than 5,483). Population estimates include only residential populations.

2.13. Public receptors within distance to endpoint. Public receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Public receptor means locations where members of the public may be exposed to toxic concentrations, radiant heat, or overpressure as a result of the release. Public receptors include locations within the facility's property boundary to which the public has routine and unrestricted access during or outside business hours (e.g. a recreation field). Locations inhabited or occupied by the public at any time without restriction by the source (such as fences or security guards) are public receptors (see the *General Guidance for Risk Management Programs* for more information on identifying public receptors). You do not need to list specific locations or estimate populations at these locations. The presence of these receptors may be determined using local street maps. Select all that apply.

a. Schools. Public and private elementary, secondary, or post-secondary educational institutions (e.g., colleges).
b. Residences
c. Hospitals
d. Prisons or Correctional facilities
e. Recreation areas. Including stadiums, parks, and public pools.
f. Major commercial, office, or industrial areas. Including industrial parks, office buildings, shopping malls, commercial areas, and commercial farms.
g. Other (Specify). Include any other additional information here.

2.14. Environmental receptors within distance to endpoint. Environmental receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Environmental receptor means natural areas, such as national or state parks, forests, or monuments; officially designated wildlife sanctuaries, preserves, refuges, or areas; and federal wilderness areas, that could be exposed at any time to toxic concentrations, radiant heat, or overpressure as a result of the release. Environmental receptors can be identified on local U.S. Geological Survey maps, which can be found at many libraries. Select all that apply.

a. National or state parks, forests, or monuments
b. Officially designated wildlife sanctuaries, preserves, or refuges
c. Federal wilderness areas
d. Other (Specify). Include any other additional information here.

2.15. Passive mitigation considered. Mitigation means specific activities, technologies, or equipment designed or deployed to capture or control substances that have been released to minimize exposure of the public or the environment. Passive mitigation means equipment, devices, or technologies that function without human, mechanical, or other energy input. Select all passive mitigation measures that were considered in defining the release quantity or rate to the worst-case scenario.

a. Dikes. A low wall that acts as a barrier to prevent a spill from spreading.
b. Enclosures. Physical containment of the release within a structure (e.g., a building).
c. Berms. A mound or wall of earth at the top or bottom of a slope that prevents a spill from spreading.
d. Drains. A channel that carries off surface water.
e. Sumps. A pit or tank that catches liquid runoff for drainage or disposal.
f. Other (specify)

2.16. Graphics file name (Optional). You may submit one graphic file to illustrate each release scenario. Entering a graphics file name in this field will not automatically cause that file to be included in your RMP submission. You must take the extra step of copying the graphics file from your hard drive to a diskette. This diskette can be either the same one that includes your RMP submission ASCII file, or an additional diskette that contains just your graphics file(s).

Graphics will be accepted in either GIF or JPEG file format. These are the most popular graphics formats in use today on the Internet. Most commercial drawing, painting, or scanning software supports these two graphics file formats. You may want to search www.shareware.com for a list of graphics programs that are available for download, either as shareware or evaluation versions.

JPEG (pronounced "jay-peg") is a standardized image compression mechanism. JPEG stands for Joint Photographic Experts Group, the original name of the committee that wrote the standard. JPEG is designed for compressing either full-color or gray-scale images of natural, real-world scenes. It works well on photographs, naturalistic artwork, and similar material.

GIF (tm) is a standard for defining generalized color "raster" images. This "Graphics Interchange Format" allows high-quality, high-resolution graphics to be displayed on a variety of graphics hardware and is intended as an exchange and display mechanism for graphics images.

SECTION 3 TOXICS: ALTERNATIVE RELEASES

Complete this section for each toxic regulated substance held above the threshold quantity in a Program 2 or Program 3 process.

3.1.a. Chemical Name. Enter the name of the regulated toxic chemical you evaluated in the alternative release scenario.

3.1.b. Percent weight of chemical (if in a mixture). If your alternative scenario involves the release of a mixture containing a regulated substance, enter the percentage weight of the regulated substance in the mixture. Leave blank if it is not a mixture.

3.2. Physical state. Select the physical state of the chemical in the vessel that you are modeling.

- **a. Gas.**
- **b. Liquid.**
- **c. Gas liquified by pressure.**
- **d. Gas liquified by refrigeration**.

3.3. Model used (select one). Select the source of your results for your alternative release analysis or enter another model name in "Other."

- a. EPA's *OCA Guidance* Reference Tables or Equations
- b. EPA's *RMP Guidance for Ammonia Refrigeration* Reference Tables or Equations
- d. EPA's *RMP Guidance for Waste Water Treatment Plants* Reference Tables or Equations
- e. EPA's *RMP Guidance for Warehouses* Reference Tables or Equations
- f. EPA's *RMP Guidance for Chemical Distributors* Reference Tables or Equations
- g. EPA's RMP*Comp™
- h. Areal Locations of Hazardous Atmospheres (ALOHA®)
- z. Other model (specify)

3.4. Scenario. Select one of the following which describes your alternative release scenario or enter another scenario in Other:

- **a. Transfer Hose Failure**. Failure of the connection between two or more vessels.
- **b. Pipe Leak.** Release through a rupture in a pipe.
- **c. Vessel Leak.** Release through a rupture in a vessel.
- **d. Overfilling.** Release due to filling a pipe, vessel, or other container past its capacity.
- **e. Rupture Disk/Relief Valve.** Release due to failure of a rupture disk/relief valve to function properly. A rupture disk/relief valve is a valve that relieves pressure beyond a specified limit; a relief valve recloses upon return to normal operating conditions.
- **f. Excess Flow Valve Failure.** Release caused by the failure of excess flow device to function properly and prevent surges from reaching downstream equipment.
- **g. Other (specify)**

3.5. Quantity released (lbs). Enter the quantity of toxic chemical you used for your alternative scenario analysis in pounds to 2 significant digits. If you have less than 1 pound released, round up to 1 pound. You may want to clarify that in your Executive Summary.

3.6. Release rate (lbs/minute). Enter the rate of release to the outside air in pounds per minute to 1 significant digit. For example:

4.3 pounds	should be reported as...	4 pounds
19 pounds	should be reported as...	20 pounds

See Chapter 4 of the *General Guidance for Risk Management Programs* for more information.

3.7. Release duration (minutes). Indicate the length of time in minutes to the nearest minute for the released quantity to be released to the outside air (from the time the release starts to the time it is mitigated or stopped). See Chapter 4 of the *General Guidance for Risk Management Programs* for more information.

3.8. Wind speed (meters/second). If you used the *OCA Guidance* or one of EPA's model program guidance documents, indicate 3 meters per second. If you modeled your scenario separately, indicate the wind speed used.

3.9. Atmospheric Stability Class. If you used the *OCA Guidance* or one of EPA's model program guidance documents, list "D" stability. If you modeled your scenario separately, indicate the stability class used.

3.10. Topography (select one). Indicate whether the local topography is urban or rural. Urban means that there are many obstacles in the immediate area; obstacles include buildings or trees. Rural means that the terrain is generally flat and unobstructed in the immediate area.

3.11. Distance to endpoint (miles). Indicate the distance to the endpoint in miles to 2 significant digits, using the endpoint specified for the chemical in 40 CFR Part 68, Appendix A. Convert your modeling results into miles by dividing the distance in feet by 5280 or yards by 1760. Refer to the following to determine 2 significant digits:

.397 miles	should be reported as...	.40 miles
9.345 miles	should be reported as...	9.3 miles
20.764 miles	should be reported as...	21 miles

3.12. Residential population within distance to endpoint. Estimate the population within the circle with a center at the point of the release and a radius determined by the distance to the endpoint to two significant digits (e.g., 5,500 people rather than 5,483). Population estimates include only residential populations.

3.13. Public receptors within distance to endpoint. Public receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Public receptor means locations where members of the public may be exposed to toxic concentrations, radiant heat, or overpressure as a result of the release. Public receptors include locations within the facility's property boundary to which the public has routine and unrestricted access during or outside business hours (e.g. a recreation field). Locations inhabited or occupied by the public at any time without restriction by the source (such as fences or security guards) are public receptors (see the *General Guidance for Risk Management Programs* for more information on identifying public receptors). You do not need to list specific locations or estimate populations at these locations. The presence of these receptors may be determined using local street maps. Select all that apply.

a. Schools. Public and private elementary, secondary, or post-secondary educational institutions (e.g., colleges).

b. Residences

c. Hospitals

d. Prisons or Correctional facilities

e. Recreation areas. Including stadiums, parks, and public pools.

f. Commercial, office, or industrial areas. Including industrial parks, office buildings, shopping malls, commercial areas, and commercial farms.

g. Other (Specify). Include any other additional information here.

3.14. Environmental receptors within distance to endpoint. Environmental receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Environmental receptor means natural areas, such as national or state parks, forests, or monuments; officially designated wildlife sanctuaries, preserves, refuges, or areas; and federal wilderness areas, that could be exposed at any time to toxic concentrations, radiant heat, or overpressure as a result of the release. Environmental receptors can be identified on local U.S. Geological Survey maps, which can be found at many libraries. Select all that apply.

a. National or state parks, forests, or monuments

b. Officially designated wildlife sanctuaries, preserves, or refuges

c. Federal wilderness areas

d. Other (Specify). Include any other additional information here.

3.15. Passive mitigation considered. Select all passive mitigation measures that were considered in defining the release quantity or rate of the alternative release scenario.

a. Dikes. A low wall that acts as a barrier to prevent a spill from spreading.

b. Enclosures. Physical containment of the release within a structure (e.g., a building).

c. Berms. A mound or wall of earth at the top or bottom of a slope that prevents a spill from spreading.

d. Drains. A channel that carries off surface water.

e. Sumps. A pit or tank that catches liquid runoff for drainage or disposal.

f. Other (specify). List a type other than what is listed above.

3.16. Active mitigation considered. Active mitigation means equipment, devices, or technologies that need human, mechanical, or other energy input to function. Select all that were considered in defining the release quantity or rate of the alternative release scenario.

a. Sprinkler systems. A system for protecting a building against fire by means of overhead pipes which convey an extinguishing fluid through heat activated outlets.

b. Deluge systems. A system to overflow an area of a release with water or other extinguishing fluid.

c. Water curtain. A spray of water from a horizontal pipe through nozzles; the curtain may be activated manually or automatically.

d. Neutralization. Making a toxic chemical harmless through chemical reaction.

e. Excess flow valve. A system for diverting overflow.

f. Flares. A device for disposing of combustible gases from a chemical process by burning them in the open.

g. Scrubbers. A pre-release protection measure that uses water or aqueous mixtures containing scrubbing reagents to remove discharging liquids and possibly also treating the discharging chemical.

h. Emergency shutdown systems. Controls that are triggered when process limits are exceeded and that shut down that process.

i. Other (specify)

3.17. Graphics file name (Optional). You may submit one graphic file to illustrate each release scenario. Entering a graphics file name in this field will not automatically cause that file to be included in your RMP submission. You must take the extra step of copying the graphics file from your hard drive to a diskette. This diskette can be either the same one that includes your RMP submission ASCII file, or an additional diskette that contains just your graphics file(s).

<u>Graphics will be accepted in either GIF or JPEG file format.</u> See 2.16 for an explanation of GIF and JPEG.

SECTION 4 FLAMMABLES: WORST-CASE

Complete this section for each flammable worst-case scenario you report.

4.1. Chemical. Enter the name of the regulated flammable chemical you evaluated in the worst-case scenario.

4.2. Model used (select one). Select the source of your results for your worst-case release analysis or enter another model name in "Other."

a. EPA's *OCA Guidance* Reference Tables or Equations
c. EPA's *RMP Guidance for Propane Storage Facilities* Reference Tables or Equations
d. EPA's *RMP Guidance for Waste Water Treatment Plants* Reference Tables or Equations
e. EPA's *RMP Guidance for Warehouses* Reference Tables or Equations
f. EPA's *RMP Guidance for Chemical Distributors* Reference Tables or Equations
g. EPA's RMP*Comp™
z. Other model (specify)

4.3. Scenario. This data element is fixed. The worst-case release scenario for a flammable substance is a **vapor cloud explosion**, which is an explosion of a cloud containing a flammable vapor or gas and air.

4.4. Quantity released (lbs). Enter the quantity of flammable substance you used for your worst-case scenario analysis in pounds to 2 significant digits. This is the total amount that would be lost from a vessel or pipeline used in the calculation of distance to 1 psi reported in 4.6. See Chapter 2 on Determining Worst-Case Scenarios in the *RMP Offsite Consequence Analysis Guidance* for more details. Here's how to report the quantity to 2 significant digits:

5,333 pounds	should be reported as...	5,300 pounds
107,899 pounds	should be reported as...	110,000 pounds

If you have less than 1 pound released, round up to 1 pound. You may want to clarify that in your Executive Summary.

4.5. Endpoint used. This data element is fixed. For vapor cloud explosions, the endpoint is **1 psi** overpressure.

4.6. Distance to endpoint (miles). Indicate the distance to the endpoint in miles to 2 significant digits, using the endpoint specified for the chemical in 40 CFR Part 68, Appendix A. Convert your modeling results into miles by dividing the distance in feet by 5280 or yards by 1760. Refer to the following to determine 2 significant digits:

.397 miles	should be reported as...	.40 miles
9.345 miles	should be reported as...	9.3 miles
20.764 miles	should be reported as...	21 miles

4.7. Residential population within distance to endpoint. Estimate the population within the circle with a center at the point of the release and a radius determined by the distance to the endpoint to two significant digits (e.g., 5,500 people rather than 5,483). Population estimates include only residential populations.

4.8. Public receptors within distance to endpoint. Public receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Public receptor means locations where members of the public may be exposed to toxic concentrations, radiant heat, or overpressure as a result of the release. Public receptors include locations within the facility's property boundary to which the public has routine and unrestricted access during or outside business hours (e.g. a recreation field). Locations inhabited or occupied by the public at any time without restriction by the source (such as fences or security guards) are public receptors (see the *General Guidance for Risk Management Programs* for more information on identifying public receptors). You do not need to list specific locations or estimate populations at these locations. The presence of these receptors may be determined using local street maps. Select all that apply.

a. Schools. Public and private elementary, secondary, or post-secondary educational institutions (e.g., colleges).
b. Residences
c. Hospitals
d. Prisons or Correctional facilities
e. Recreation areas. Including stadiums, parks, and public pools.
f. Commercial, office, or industrial areas. Including industrial parks, office buildings, shopping malls, commercial areas, and commercial farms.
g. Other (Specify). Include any other additional information here.

4.9. Environmental receptors within distance to endpoint. Environmental receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Environmental receptor means natural areas, such as national or state parks, forests, or monuments; officially designated wildlife sanctuaries, preserves, refuges, or areas; and federal wilderness areas, that could be exposed at any time to toxic concentrations, radiant heat, or overpressure as a result of the release. Environmental receptors can be identified on local U.S. Geological Survey maps, which can be found at many libraries. Select all that apply.

a. National or state parks, forests, or monuments
b. Officially designated wildlife sanctuaries, preserves, or refuges
c. Federal wilderness areas
d. Other (Specify). Include any other additional information here.

4.10. Passive mitigation considered. Select all passive mitigation measures that were considered in defining the release quantity or rate for the worst-case scenario.

a. Blast Walls. A heavy wall used to isolate buildings or areas that contain highly combustible or explosive materials.
b. Other (specify)

4.11. Graphics file name (Optional). You may submit one graphic file to illustrate each release scenario. Entering a graphics file name in this field will not automatically cause that file to be included in your RMP submission. You must take the extra step of copying the graphics file from your hard drive to a diskette. This diskette can be either the same one that includes your RMP submission ASCII file, or an additional diskette that contains just your graphics file(s).

<u>Graphics will be accepted in either GIF or JPEG file format.</u> See 2.16 for an explanation of GIF and JPEG.

SECTION 5 FLAMMABLES: ALTERNATIVE RELEASES

Complete this section for each flammable alternative release scenario you report.

5.1. Chemical. Enter the name of the regulated flammable chemical you evaluated in the alternative release scenario.

5.2. Model used (select one). Select the source of your results for your alternative release analysis or enter another model name in "Other."

a. EPA's *OCA Guidance* Reference Tables or Equations
c. EPA's *RMP Guidance for Propane Storage Facilities* Reference Tables or Equations
d. EPA's *RMP Guidance for Waste Water Treatment Plants* Reference Tables or Equations
e. EPA's *RMP Guidance for Warehouses* Reference Tables or Equations
f. EPA's *RMP Guidance for Chemical Distributors* Reference Tables or Equations
g. EPA's RMP*Comp™
z. Other model (specify)

5.3. Scenario. Select one of the following or enter another scenario in Other:

a. Vapor Cloud Explosion. An explosion of a cloud containing a flammable vapor or gas and air.
b. Fireball. The atmospheric burning of a fuel-air cloud in which the energy is mostly emitted in the form of radiant heat. As the buoyancy forces of the hot gases begin to dominate, the burning cloud rises and becomes spherical in shape. Often caused by the ignition of a vapor cloud of a flammable substance.
c. BLEVE. Boiling Liquid Expanding Vapor Explosion (BLEVE) is used to describe the sudden rupture of a vessel/system containing liquefied flammable gas under pressure due to radiant heat flux. The pressure burst and the flashing of the liquid to vapor creates a blast wall and potential missile damage, and immediate ignition of the expanding fuel-air mixture leads to an intense combustion creating a fireball.
d. Pool Fire. The combustion of material evaporating from a layer of liquid at the base of the fire.
e. Jet Fire. Gas discharging or venting from a rupture will form a gas jet that "blows" into the atmosphere in the direction the hole is facing, all the while entraining and mixing with air. If the gas is flammable and encounters an ignition source, a flame jet may form.
f. Vapor Cloud Fire. A flash fire results from the ignition of a released flammable cloud in which there is essentially no increase in the combustion rate.
g. Other (specify)

5.4. Quantity released (lbs). Enter the quantity of the flammable substance you used for your alternative scenario analysis in pounds to 2 significant digits. If you have less than 1 pound released, round up to 1 pound. You may want to clarify that in your Executive Summary.

5.5. Endpoint used. For vapor cloud explosions, the endpoint is 1 psi overpressure; for a fireball the endpoint is 5 kW/m^2 for 40 seconds; for vapor cloud fires or jet fires, a lower flammability limit (expressed as a percentage) may be listed as specified in NFPA documents or other generally recognized sources. These are listed in the *OCA Guidance*.

5.6. Distance to endpoint (miles). Indicate the distance to the endpoint in miles to 2 significant digits, using the endpoint specified for the chemical in 40 CFR Part 68, Appendix A. Convert your modeling results into miles by dividing the distance in feet by 5280 or yards by 1760. Refer to the following to determine 2 significant digits:

.397 miles	should be reported as...	.40 miles
9.345 miles	should be reported as...	9.3 miles
20.764 miles	should be reported as...	21 miles

5.7. Residential population within distance to endpoint. Estimate the population within the circle with a center at the point of the release and a radius determined by the distance to the endpoint to two significant digits (e.g., 5,500 people rather than 5,483). Population estimates include only residential populations.

5.8. Public receptors within distance to endpoint. Public receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Public receptor means locations where members of the public may be exposed to toxic concentrations, radiant heat, or overpressure as a result of the release. Public receptors include locations within the facility's property boundary to which the public has routine and unrestricted access during or outside business hours (e.g. a recreation field). Locations inhabited or occupied by the public at any time without restriction by the source (such as fences or security guards) are public receptors (see the *General Guidance for Risk Management Programs* for more information on identifying public receptors). You do not need to list specific locations or estimate populations at these locations. The presence of these receptors may be determined using local street maps. Select all that apply.

a. Schools. Public and private elementary, secondary, or post-secondary educational institutions (e.g., colleges).
b. Residences
c. Hospitals
d. Prisons or Correctional facilities
e. Recreation areas. Including stadiums, parks, and public pools.
f. Commercial, office, or industrial areas. Including industrial parks, office buildings, shopping malls, commercial areas, and commercial farms.
g. Other (Specify). Include any other additional information here.

5.9. Environmental receptors within distance to endpoint. Environmental receptors must be identified within the circle with a center at the point of the release and a radius determined by the distance to the endpoint. Environmental receptor means natural areas, such as national or state parks, forests, or monuments; officially designated wildlife sanctuaries, preserves, refuges, or areas; and federal wilderness areas, that could be exposed at any time to toxic concentrations, radiant heat, or overpressure as a result of the release. Environmental receptors can be identified on local U.S. Geological Survey maps, which can be found at many libraries. Select all that apply.

a. National or state parks, forests, or monuments
b. Officially designated wildlife sanctuaries, preserves, or refuges
c. Federal wilderness areas
d. Other (Specify). Include any other additional information here.

5.10. Passive mitigation considered. Select all passive mitigation measures that were considered in defining the release quantity or rate for the alternative scenario.

a. Dikes. A low wall that acts as a barrier to prevent a spill from spreading.

b. Fire Walls. A wall constructed to prevent the spread of fire.

c. Blast Walls. A heavy wall used to isolate buildings or areas that contain highly combustible or explosive materials.

d. Enclosures. Physical containment of the release within a structure (e.g., a building).

f. Other (specify)

5.11. Active mitigation considered. Active mitigation means equipment, devices, or technologies that need human, mechanical, or other energy input to function. Select all that were considered in defining the release quantity or rate of the alternative release scenario.

a. Sprinkler Systems. A system for protecting a building against fire by means of overhead pipes which convey an extinguishing fluid through heat activated outlets.

b. Deluge Systems. A system to overflow an area of a release with water or other extinguishing fluid.

c. Water Curtain. A spray of water from a horizontal pipe through nozzles, the curtain may be activated manually or automatically.

d. Excess Flow Valve. A system for diverting overflow.

e. Other (specify)

5.12. Graphics file name (Optional). You may submit one graphic file to illustrate each release scenario. Entering a graphics file name in this field will not automatically cause that file to be included in your RMP submission. You must take the extra step of copying the graphics file from your hard drive to a diskette. This diskette can be either the same one that includes your RMP submission ASCII file, or an additional diskette that contains just your graphics file(s).

Graphics will be accepted in either GIF or JPEG file format. See 2.16 for an explanation of GIF and JPEG.

SECTION 6: FIVE-YEAR ACCIDENT HISTORY

Although much of the RMP is a summary of the risk management program at your facility, this portion of the RMP includes all of the five-year accident history information required under § 68.42. Therefore, for this section of the RMP you can simply insert the data you compiled for § 68.42. Only report accidents involving listed substances.

Did your facility have any reportable accidents in the last 5 years? If your facility did not have any reportable accidents in the last five years, then check no to confirm and leave the rest of this section blank. If your facility did have reportable accidents in the last five years, then fill in this section for each.

6.1. Date of accident. Indicate the date on which the accident occurred.

6.2. Time accident began. Indicate the time the release began.

6.3. NAICS Code of process involved. Enter the NAICS code that most closely corresponds to the process; it will not necessarily be the same NAICS code for your facility as a whole. As described in *Registration*, the NAICS code system classifies businesses by fitting them into descriptive categories that correspond to five-digit or six-digit codes. Appendix B of the *General Guidance for Risk Management Programs* provides the NAICS codes for the industry sectors most likely to subject to 40 CFR Part 68. You may also access the full list on-line at ***http://www.census.gov/epcd/www/naics.html***.

Although you are only required to report accidents on covered processes, you may choose to report other accidents as well. Therefore, RMP*Submit provides the full list of NAICS codes to choose from.

6.4. Release duration. Indicate the approximate length of time of the release in hours and minutes. (Format: HHHMM)

6.5.a.i. Chemical name. Indicate the regulated substance(s) released. Use the name of the substance as listed rather than a synonym. If the release was a NFPA-4 flammable mixture containing regulated flammables, you may list it as a “flammable mixture” and list all of the regulated substances contained in the mixture. For the quantity released, you only report the quantity of the entire mixture, not the individual substances. Only report chemicals that are listed substances.

6.5.a.ii. CAS number. Provide the Chemical Abstracts Service (CAS) registry number for each chemical name in 6.5.a.i. above. CAS numbers are listed in 40 CFR § 68.130 and in EPA’s *General Guidance for Risk Management Programs* . RMP*Submit will automatically generate the CAS # based on the chemical name chosen. For flammable mixtures, because there is no CAS #, leave this field blank. RMP*Submit will assign a "dummy" CAS number of all zeros for flammable mixtures.

6.5.b. Quantity released. Estimate the amount of each substance released in pounds. The amount should be estimated to two significant digits, or as close as possible. For example, if you estimate that the release was between 850 and 900 pounds, provide a best guess. EPA recognizes that you may not know precise quantities.

For toxics in a mixture, determine the maximum quantity of the mixture and then multiply the weight of the regulated toxic substance to determine the quantity; **do not report the weight of the entire mixture.** For example, if you have a 100,000 pound mixture of ammonia at 20% concentration, then you would multiply

the weight percent (20%) by the total quantity (100,000 pounds) to determine the quantity released of ammonia was 20,000 pounds.

For flammables in a mixture that meets the criteria of NFPA-4, report the entire weight of the mixture.

6.5.c. Percent weight of toxic chemical in mixture. If a toxic substance was in a mixture when released, indicate the percentage weight of the regulated substance in the mixture.

6.6. Release event. Indicate which of the following release events best describes your accident. Select at least one:

a. Gas Release. A gas release is a release of the substance in a vapor state. If you hold a gas liquefied under refrigeration, report the release as a liquid spill.
b. Liquid Spill/Evaporation. A liquid spill/ evaporation is a release of the substance in a liquid state with subsequent vaporization.
c. Fire.
d. Explosion.

6.7. Release source. Select at least one.

a. Storage Vessel. A storage vessel is a container used only to store or hold (as opposed to react, mix, or move) a regulated substance. Storage vessels include transportation containers (e.g., railcars or tank trucks) being used for on-site storage.
b. Piping. Piping refers to a system of pipes used to carry a fluid or gas.
c. Process Vessel. A process vessel is a container in which regulated substances are manufactured, reacted, or mixed.
d. Transfer Hose. A transfer hose is a flexible tube used to connect, often temporarily, two or more vessels.
e. Valve. A valve is a device used to regulate the flow in piping systems or machinery. Relief valves open to release pressure in vessels.
f. Pump. A pump is a device that raises, transfers, or compresses fluids or that attenuates gases by suction or pressure or both.
g. Joint. The surface at which two or more mechanical components are united.
h. Other. Specify other source of the release.

6.8. Weather conditions at time of event (if known). This information is important to those concerned with modeling the effects of accidents. Reliable information from those involved in the incident or from an on-site weather station is ideal. However, the rule does not require your facility to have an on-site weather station. If you do not have an on-site weather station, use information from your local weather station, airport, or other source of meteorological data. Historical wind speed and temperature data (but not stability data) can be obtained from the National Climatic Data Center (NCDC) at (828) 271-4800; NCDC staff can also provide information on the nearest weather station. To the extent possible, complete the following:

a.i. Wind speed. Wind speed is an estimate of how fast the wind is traveling.

a.ii. Wind speed units. Indicate the units in which the speed is expressed as either miles per hour, meters per second, or knots.

a.iii. Wind direction. Wind direction is the direction from which the wind comes. For example, a wind that blows from east to west would be described as having an eastern wind direction. Describe wind direction as one of the 16 standard compass readings [N, S, E, W, NE, SE, NW, SW, NNE, ENE, ESE, SSE, SSW, WSW, WNW, NNW], using the abbreviation. For example, wind direction must be reported as S for South, NE for Northeast, or SSW for South-Southwest.

b. Temperature. The ambient temperature at the scene of the accident in degrees Fahrenheit. If you did not keep a record, you can use the high (for daytime releases) or low (nighttime releases) for the day. Local newspapers publish these data.

c. Atmospheric Stability Class. Depending on the amount of incoming solar radiation as well as other factors, the atmosphere may be more or less turbulent at any given time. Meteorologists have defined six atmospheric stability classes, each representing a different degree of turbulence in the atmosphere. When moderate to strong incoming solar radiation heats air near the ground, causing it to rise and generating large eddies, the atmosphere is considered unstable, or relatively turbulent. Unstable conditions are associated with stability classes A and B. When solar radiation is relatively weak, air near the surface has less of a tendency to rise and less turbulence develops. In this case, the atmosphere is considered stable or less turbulent with weak winds; the stability class is E or F. Stability classes D and C represent conditions of more neutral stability, or moderate turbulence. Neutral conditions are associated with relatively strong wind speeds and moderate solar radiation. Enter either A, B, C, D, E, or F.

Atmospheric Stability Classes

SURFACE WIND SPEED AT 10 METERS ABOVE GROUND		DAY			NIGHT*	
Meters per second	Miles per hour	Incoming Solar Radiation			Thinly Overcast or ≥ 4/8 low cloud	≤ 3/8 Cloud
		Strong**	Moderate	Slight***		
< 2	<4.5	A	A-B	B		
2-3	4.5-7	A-B	B	C	E	F
3-5	7-11	B	B-C	C	D	E
5-6	11-13	C	C-D	D	D	D
>6	>13	C	D	D	D	D

*Night refers to one hour before sunset to one hour after dawn.
** Sun high in the sky with no clouds.
*** Sun low in the sky with no clouds.

d. Precipitation present. Hail, mist, rain, sleet, or snow. Check the box to indicate there was precipitation at the time of the accident.

e. Unknown weather conditions. If you have no record for any of the weather data, indicate "unknown". EPA recognizes that you may not have weather data for accidents that have occurred prior to June 1996. You must, however, collect these data during future accident investigations.

6.9. On-site impacts. Complete each of the following about on-site effects. Enter a number for each entry; if there were no impacts, enter 0.

a. Deaths. Indicate the number of on-site deaths that are attributable to the accident or mitigation activities. On-site deaths include anyone who was killed by direct exposure to toxic concentrations, radiant heat, or overpressures from the accidental release or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion). If there were no on-site deaths, enter 0. Specify the deaths as:

a.i. Employees & contract employees
a.ii. Public responders (example, fire department personnel)
a.iii. Public (example, visitors)

b. Injuries. An injury is any effect that results either from direct exposure to toxic concentrations, radiant heat, or overpressures from the accidental release or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion) and that requires medical treatment or hospitalization. Medical treatment means treatment, other than first aid, administered by a physician or registered professional personnel under standing orders from a physician (OSHA OII Log, 1904.12). Your OSHA occupational injury and illness log will help complete these items. If there were no on-site injuries, enter 0. Specify the injuries as:

a.i. Employees & contract employees
a.ii. Public responders (example, fire department personnel)
a.iii. Public (example, visitors)

c. Property damage. Estimate the value of the equipment or business structures at your facility that were damaged by the accident or mitigation activities. Record the value in American dollars. Insurance claims may provide this information. Do **not** include any losses that you may have incurred as a result of business interruption. If there was no on-site property damage or no known damage, enter 0.

6.10. Known off-site impacts. These are impacts that you should be aware of (e.g., from media reports) or that were reported to your facility. You are **not** required to conduct an additional investigation to determine off-site impacts. Enter a number for each entry; if there were no impacts, enter 0.

a. Deaths. Indicate the number of off-site deaths that are attributable to the accident or mitigation activities. Off-site deaths include anyone who was killed by direct exposure to toxic concentrations, radiant heat, or overpressures from the accidental release or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion). Responders killed while on site responding to the release are considered on-site deaths and should not be reported here. If there were no known off-site deaths, enter 0.

b. Hospitalizations. Indicate the number of people requiring hospitalization. Hospitalization means any effect that results either from direct exposure to toxic concentrations, radiant heat, or overpressures from accidental releases or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion) and that requires hospitalization. If there were no known off-site hospitalizations, enter 0.

c. Other medical treatment. Indicate the number of people requiring medical treatment. Medical treatment means any effect that results either from direct exposure to toxic concentrations, radiant heat, or overpressures from accidental releases or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., a window shattering after an explosion) and that requires medical treatment. If there was no known medical treatment, enter 0.

d. Evacuated. Estimate the number of people who were evacuated to prevent exposure that might have resulted from the accident. A total count of the number of people evacuated is preferable to the number of houses evacuated. People who were ordered to move simply to improve access to the site for emergency vehicles are not considered to have been evacuated. If there were no evacuations, enter 0.

e. Sheltered-in-place. Estimate the number of people who were sheltered-in-place during the accident. Sheltering-in-place occurs when the incident commander orders residents to remain inside their home or place of work until the emergency has ended to prevent exposure to the substance. Usually these are associated with an emergency broadcast or similar method of mass notification by response agencies. If no one sheltered in place, enter 0.

f. Property damage. Estimate the value of the equipment or structures offsite that were damaged by the accident or mitigation activities. Record the value in American dollars. Insurance claims may provide this information. There is no lower limit below which you would not have to report. If there was no property damage, enter 0.

g. Environmental damage. Indicate whether any environmental damage occurred and specify the type. The damage is not limited to environmental receptors listed in the rule. Any damage to the environment (e.g., dead or injured animals, defoliation, water contamination) must be considered. You are **not**, however, required to conduct surveys to determine whether such impact occurred. Select all that apply.

- g.1. Fish or animal kills.
- g.2. Tree, lawn, shrub, or crop damage
- g.4. Water contamination
- g.4. Soil contamination
- g.5. Other (specify)

6.11. Initiating event. Select the one initiating event that best describes the immediate cause of the accident.

a. Equipment Failure. A device or piece of equipment failed or did not function as designed. For example, the vessel wall corroded or cracked.

b. Human Error. An operator performed a task improperly, either by failing to take the necessary steps or by taking the wrong steps.

c. Natural (weather conditions, earthquake). Weather conditions, such as lightning, hail, ice storms, tornados, hurricanes, earthquakes, floods, or high winds, caused the accident.

d. Unknown.

6.12. Contributing factors. These are factors that contributed to the accident occurring, but were not the initiating event. If you conducted an investigation of the release, you should have identified factors that led to the initiating event. Select all that apply.

a. Equipment failure. A device or piece of equipment failed to contain substance or did not function as designed, thereby allowing a substance to be released.

b. Human error. An operator performed an operation improperly or made a mistake which resulted in an accident.

c. Improper procedures. The procedure did not reflect the proper method of operation, the procedure omitted steps that affected the accident, or the procedure was written in a manner that allowed for misinterpretation of the instructions.

d. Overpressurization. The process was operated at pressures exceeding the design working pressure.

e. Upset condition. Release was caused by incorrect process conditions (e.g., increased temperature or pressure).

f. By-pass condition. The failure occurred in a pipe, channel, or valve that diverts fluid flow from the main pathway when design process or storage conditions are exceeded (e.g., overpressure). By-pass conditions may be designed to release the substance to restore acceptable process or storage conditions and prevent more severe consequences (e.g., explosion).

g. Maintenance activity or inactivity. The failure occurred because of maintenance activity or inactivity. An example of maintenance activity is putting the wrong gasket on a tank fitting. An example of maintenance inactivity is storage racks that remained unpainted for so long that corrosion caused the metal to fail.

h. Process design failure. The failure resulted from an inherent flaw in the design of the process (e.g., pressure needed to make product exceeds the design pressure of the vessel).

i. Unsuitable equipment. The equipment used was incorrect for the process. For example, the forklift was too large for the corridors.

j. Unusual weather conditions. Weather conditions, such as lightning, hail, ice storms, tornados, hurricanes, earthquakes, floods, or high winds caused the accident.

k. Management error. The failure occurred because management did not exercise its managerial control to prevent the situation from arising. This is usually used to describe faulty procedures, inadequate training, inadequate oversight, or failure to follow existing administrative procedures.

l. Other (specify)

6.13. Off-site responders notified (select one). Indicate whether response agencies (e.g., police, fire, medical services) were notified. Check one of the following choices:

a. Notified Only
b. Notified and Responded
c. No, not notified
d. Unknown.

6.14. Changes introduced as a result of the accident. Indicate any measures that you have taken at the facility to prevent recurrence of the accident. Select at least one.

a. Improved/upgraded equipment. A device or piece of equipment that did not function as designed was repaired or replaced.

b. Revised maintenance. Maintenance procedures were clarified or changed to ensure appropriate and timely maintenance including inspection and testing (i.e., increasing the frequency of inspection or adding a testing method).

c. Revised training. Training programs were clarified or changed to ensure that employees and contract employees are aware of and are practicing correct safety and administrative procedures.

d. Revised operating procedures. Operating procedures were clarified or changed to ensure that employees and contract employees are trained on appropriate operating procedures.

e. New process controls. New process designs and controls were installed to correct problems and prevent recurrence of an accidental release.

f. New mitigation systems. New mitigation systems were initiated to limit the severity of accidental releases.

g. Revised emergency response plan. The emergency response plan was revised.

h. Changed process. Process was altered to reduce the risk (e.g., process chemistry was changed).

i. Reduced inventory. Inventory was reduced at the facility to reduce the potential release quantities and the magnitude of the hazard.

j. None. No changes initiated at facility as a result of the accident (i.e., none were necessary or technically feasible). There may be some accidents that could not have been prevented because they were caused by events that are too rare to merit additional steps. For example, if a tornado hit your facility and you are located in an area where tornados are very rare, it may not be reasonable to design a “tornado-proof” process even if it is technically feasible.

k. Other (specify).

OVERVIEW OF PREVENTION PROGRAMS (SECTIONS 7-8)

How Must Prevention Program Data Be Reported?

Prevention program data must be reported on a process-by-process basis. In other words, you must fill out the prevention program section of the RMP for each Program 2 or Program 3 process you have that is subject to the RMP rule.

How to report the prevention program for a process depends on how many units the process contains and whether the prevention program applies different safeguards to different units in the process. The RMP rule broadly defines "process" to include interconnected or co-located production and storage units. Under the definition, multiple units and, in some cases, whole sources may be a single "process" for purposes of the RMP rule. For multiple unit processes, EPA recognizes that prevention program implementation may involve different safeguards for different units in the process. For example, different production units may have different operating procedures. At the same time, some safeguards, such as management of change procedures, may apply to all the units in the process. To accommodate these circumstances, RMP*Submit includes two features which make it easier to indicate how a prevention program applies to a multiple-unit process.

If your <u>process consists of two or more units and different safeguards apply to different units in that process</u>, you can report the prevention program for that process in one of the two following ways. You must, however, use one of the two ways to report your program.

- Use the description field in the prevention program to describe in narrative form how your prevention program is implemented with respect to the different units in the process. You could start by listing the common prevention program elements you implement for all of the units (e.g., use of an alarm system or standard management of change procedures). You would then indicate what additional prevention program elements you employ for specified units (e.g., use of a dike for certain process units).

- Report your prevention program for the process on a unit-by-unit basis by filling out the prevention program portion of the RMP for every unit in the process, rather than for the process as a whole. That way, the differences in the program as it relates to each unit will be clear from the report. However, as noted above, some aspects of a prevention program may be common to all units. To simplify the reporting of common elements, RMP*Submit has an autocopy feature that allows you to enter data elements only once. This feature works by entering the common elements into RMP*Submit and then hitting the COPY function at the bottom of the screen to copy that information to another prevention program "record." (If you are submitting on paper, you can achieve the same effect by filling in the common data elements first and then copying the pages containing the common data elements.) To complete the prevention program record for each unit, enter the remaining data which is unique to each.

If your <u>process consists of only one unit, or you apply every element of your prevention program to all the units in the process</u>, you are **not** required to complete the description section of this portion of the RMP or report on a unit-by-unit basis. However, you may use the description field to elaborate on your prevention program.

Many prevention program data elements ask you to enter the date for the most recent "review or revision" of a prevention program element required by part 68. For your first RMP submission, if you are subject to prevention program requirements **only** under the RMP rule (as opposed to other federal or state laws), you should enter the date by which you completed the prevention program element being addressed. For instance, for data element number 7.5, *"Date of most recent review or revision of operating procedures,"* you should enter the date by which you met the operating procedures requirements of section 68.69(a) of the RMP rule (if applicable to you). Since this requirement must be met by the time your first RMP is due, you may enter the date you complete or submit your first RMP. In the case of data element number 7.3 (*"Date on which safety information was last reviewed or revised"*), you should enter the date you met the requirement of section 68.65(a) (if applicable to you), since section 68.65(a) requires you to meet the requirement **before** you conduct the process hazard analysis for the process.

If you are subject to prevention program requirements under other federal or state laws, you may be in compliance with RMP prevention program requirements as a result of complying with the other laws. Sources subject to OSHA PSM, for example, may already meet RMP prevention program requirements for Program 3 processes, since those requirements are identical to OSHA PSM prevention program requirements. For your first RMP submission, if you have fulfilled RMP prevention program requirements in complying with other federal or state laws, you should enter the date you complied with the requirement or the date you last reviewed or revised the relevant aspect of your program, whichever is later. For example, OSHA PSM and the RMP rule both require covered sources to compile and update (under specified circumstances) process safety information. If you previously compiled the information for purposes of complying with OSHA PSM and you have not updated it since, you should enter the date you compiled it for OSHA in your RMP. If you have updated the information since compiling it, you should enter the date of the update.

For subsequent RMP submissions, you should enter the date by which you completed any review or revision of a prevention program element. Several prevention program elements must be reviewed and, if necessary, revised following a change affecting the process (see, e.g., requirement to update safety information in section 68.75(d)). Under the compliance audit requirement of sections 68.58 or 68.79 of the RMP Program, all prevention program elements must be reviewed and, if appropriate, revised every three years. When you re-submit your next RMP (due every 5 years or more frequently based on the requirements in section 68.190), you are required to fully update and certify all nine sections of the RMP. If, by the time you re-submit, you have reviewed or revised one or more prevention program elements as a result of a change or an audit, you must enter the date of your review or revision.

SECTION 7: PREVENTION PROGRAM FOR PROGRAM 3 PROCESSES

Complete this section for each prevention program you report.

Prevention program description. If different safeguards apply to different units in your process, use this field to explain how the prevention program for the process relates to the different units in the process. For example, "This process includes three interconnected production units, A, B, and C. Everything in this prevention program applies to all three units, with the following exceptions:
- The dates of the PHA, which are 01/02/97, 6/5/96 and 4/3/96 for units A, B and C, respectively.
- Production unit A uses only a scrubber as a process control, while units B and C have relief valves and scrubbers.
- The water curtain indicated as a mitigation measure applies only to production unit C."

If you have so many "exceptions" that it gets too complicated to explain as above, but you still have many common data elements, you can report your prevention program on a unit-by-unit basis. To simplify such reporting, you can use the autocopy feature in RMP*Submit so that you only have to enter the common data elements once. First, enter the common elements into RMP*Submit (or the paper form, if you are submitting in paper), then hit the COPY function at the bottom of the screen to copy that information to another prevention program "record" (if you are submitting in paper, photocopy the pages). To complete the prevention program record for each unit, enter the remaining data which is unique to each.

7.1. NAICS code for the process. Enter the NAICS code that most closely corresponds to the process; it will not necessarily be the same NAICS code for your facility as a whole. The NAICS code that you choose must be one that you've already entered in the Registration Section for the covered process. If you have two processes with the same NAICS code, explain in the above description field which of the two processes this prevention program relates to. RMP*Submit will produce a list of the NAICS codes that you have already entered for your registered processes as a pick list for this data element. As described in the *Registration* section of this manual, the NAICS code system classifies businesses by type using descriptive categories that correspond to five-digit or six-digit codes.

7.2. Chemical name(s). For each prevention program, provide the names of all regulated substances held above the threshold in the covered units. If you have an NFPA-4 flammable mixture containing regulated flammables, you may list it as a flammable mixture. You do not need to list the individual substances in the flammable mixture.

7.3. Date on which the safety information was last reviewed or revised. The safety information requirements for Program 3 processes can be found at 40 CFR §68.65. For your first RMP submission, enter the date you complied with the requirement of §68.65(a) (compile safety information) for the process or the date you last reviewed or revised the safety information, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date the safety information was most recently reviewed or revised. Safety information may be reviewed or revised as a result of, among other things, a change to the process (see §68.75(d)) or a periodic audit of the prevention program (see §68.79(a)). If the safety information was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.4. Process Hazard Analysis (PHA). The PHA requirements for Program 3 processes can be found at 40 CFR §68.67. Provide the following information about the PHA you conducted for the process.

a. Date of last PHA or PHA update. The date you completed or updated your most recent PHA.

b. Technique used. Check any of the following techniques that you used to evaluate the hazards of your process or part of the process (see Chapter 7, Appendix 7-A, of the *General Guidance for Risk Management Programs* for a description of these techniques). Select at least one:

b.1. What If
b.2. Checklist
b.3. What If/Checklist (combined)
b.4. HAZOP
b.5. Failure Mode & Effects Analysis
b.6. Fault Tree Analysis
b.7. Other (specify)

7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update. Enter the date you completed or expect to complete any changes resulting from the PHA. This may be blank if there were no changes.

7.4.d. Major hazards identified (select at least one). Any major hazards that were identified for the process or part of the process as a result of the PHA. Major hazards are described below.

7.4.d. Major Hazard	Description
1. Toxic Release	If an accidental release occurred, a regulated toxic substance could be released. For listed toxics, a toxic release will always be a major hazard.
2. Fire	Process upsets, leaks, equipment failure, etc., could result in a fire. For listed flammables, fire will always be a major hazard. Fire may also be a hazard for some listed toxics, and in some processes could cause a toxic release.
3. Explosion	Confined or unconfined vapor cloud explosions. For listed flammables, explosion will generally be a major hazard. Explosion may also be a hazard for toxics, especially those handled under extreme conditions.
4. Runaway reaction	An uncontrolled reaction that proceeds at an increasing rate.
5. Polymerization	A chemical reaction that produces the bonding of two or more monomers.
6. Overpressurization	Instantaneous energy release or detonation.
7. Corrosion	Corrosion could lead to destruction of equipment and release of a regulated substance. Corrosion is likely to be a major hazard for substances identified as corrosives on MSDSs unless the equipment used limits the hazard.
8. Overfilling	Filling a tank or vessel beyond its maximum safe capacity.
9. Contamination	A release could occur if inappropriate substances are introduced into storage or process vessels. Contamination may be a major hazard when controlling inappropriate substances (e.g., H_2O) is difficult.

7.4.d. Major Hazard	Description
10. Equipment failure	Equipment failure is likely to be a major hazard for most processes, because such failure could lead to a release. Equipment failure includes cracks, weld failures, disk failures, ruptures, pump/gauge/control system failures, etc.
11. Loss of cooling, heating, electricity, instrument air	These losses could be major hazards if they could lead to a release. For example, loss of cooling could lead to an increase in pressure and failure of a vessel or pipe, and a loss of heating or power could lead to unstable processes. These conditions are less likely to be major hazards for substances handled at atmospheric temperatures and pressures.
12. Earthquake	Report earthquakes as a major hazard only if there is a great enough risk of their occurring at your site that you plan and design for them.
13. Floods (Flood Plain)	Report floods as a major hazard only if there is a great enough risk of their occurring at your site that you plan and design for them.
14. Tornadoes	Report tornadoes as a major hazard only if there is a great enough risk of their occurring at your site that you plan and design for them.
15. Hurricanes	Report hurricanes as a major hazard only if there is a great enough risk of their occurring at your site that you plan and design for them.
16. Other	Specify any other major hazards not listed above.

7.4.e. Process controls in use (select at least one). All of the process controls used on the process or part of the process. Process controls are equipment and associated procedures used to prevent or limit releases and are described below. If none are applicable, check "none."

7.4.e. Process Controls	Description
1. Vents	An opening provided for the discharge of pressure or release of pressure from tanks, vessels, or processing equipment.
2. Relief valves	A valve that relieves pressure beyond a specified limit and recloses upon return to normal operating pressure.
3. Check valves	A device for automatically limiting the flow in a piping system to a single direction.
4. Scrubbers	A pre-release protection measure that uses water or aqueous mixtures containing scrubbing reagents to remove discharging liquids and may treat the discharging chemical.
5. Flares	A pre-release protection measure used for flammable gases and vapors to remove and possibly treat discharged liquids.
6. Manual shutoffs	Manual controls of the shutoff flow to a pipe or vessel.

7.4.e. Process Controls	Description
7. Automatic shutoffs	Controls the shutoff flow to a pipe or vessel and are triggered automatically when process conditions are exceeded.
8. Interlocks	A switch or other device that prevents activation of a piece of equipment when a protective door is open or some other hazard exists.
9. Alarms and procedures	Systems that trigger a warning device after the occurrence of a hazardous condition and procedures to activate an alarm system.
10. Keyed bypass	A bypass system that is activated by a control signal.
11. Emergency air supply	A backup system to provide air to a process when the regular air supply fails.
12. Emergency power	Backup power systems.
13. Backup pump	A secondary pump intended to serve the same function as the primary pump if the primary pump fails.
14. Grounding equipment	Devices that ground electrical equipment to avoid explosions.
15. Inhibitor addition	A substance that is added to a reaction that is capable of stopping or retarding a chemical reaction.
16. Rupture disks	A device that relieves pressure beyond a specified limit.
17. Excess flow device	Flow-limiting equipment that protects downstream equipment from surges.
18. Quench system	A system that cools by removing excess heat or immersing liquid into a cooling medium.
19. Purge system	A system that replaces the atmosphere in a container with an inert substance to prevent the formations of an explosive mixture.
20. None	None are applicable.
21. Other	Specify any other process controls that you may use on your process and that are not specified above.

7.4.f. Mitigation systems in use (select at least one). All of the mitigation systems you have in place to control a release from the process or part of the process. Mitigation systems are described below. If none are applicable, check "none."

7.4.f. Mitigation Systems	Description
1. Sprinkler systems	A system for protecting a building against a fire by means of overhead pipes that release an extinguishing material through heat activated outlets.
2. Dikes	A low wall that acts as a barrier to prevent a spill from spreading.
3. Fire walls	A wall constructed to prevent the spread of fire.
4. Blast walls	A heavy wall used to isolate buildings or areas that contain highly combustible or explosive materials.
5. Deluge system	A system to overflow an area with a release of water or other extinguishing fluid.
6. Water curtain	A spray of water from a horizontal pipe through nozzles. The curtain may be activated manually or automatically.
7. Enclosure	Something that facilitates the physical containment of a release within a structure (e.g., a building).
8. Neutralization	Controlling a release by neutralizing the released chemical.
9. None	None are applicable.
10. Other	Specify any other mitigation systems you may have in place on your process and that are not listed above.

7.4.g. Monitoring/detection systems in use (select at least one). All of the monitoring and detection systems you have installed to detect a release of a regulated substance from the process or part of the process. Monitoring and detection systems are described below. If none are applicable, check "none."

7.4.g. Monitoring & Detection Systems	Description
1. Process area detectors	Detection systems located on or close to process equipment. Detection systems include indicator tubes, and chromatographic, spectrometric, electrochemical, and colorimetric gas analysis.
2. Perimeter monitors	Integrated detection networks at the source boundary. Detection systems can include fluorescent SO_2 analyzers, photoelectric tape sensors, or electrolytic chlorine detectors.
3. None	None are applicable.
4. Other	Specify any other monitoring and detection systems you have in place and that are not listed above.

7.4.h. Changes since last PHA or PHA update (select at least one). All of the changes made to the process or part of the process since the last PHA. If none are applicable, check "none."

7.4.h. Changes Since Last PHA or PHA Update	Description
1. Reduction in chemical inventory	A decrease in the quantity of regulated substances stored on-site.
2. Increase in chemical inventory	An increase in the quantity of regulated substances stored on-site.
3. Change in process parameters	Examples of changes in process parameters include an increase or decrease in temperature, pressure, flow rates, etc.
4. Installation of process controls	The addition of controls such as those described in 7.4.e.
5. Installation of process detection systems	The addition of systems such as those described in 7.4.g.
6. Installation of perimeter monitoring systems	The addition of systems such as those described in 7.4.g.
7. Installation of mitigation systems	The addition of systems such as those described in 7.4.f.
8. None recommended	Select “none” if the PHA team did not recommend any changes to the process.
9. None	None are applicable.
10. Other	Specify any other changes made to the process since the last PHA that are not listed above.

7.5. Date of most recent review or revision of operating procedures. The operating procedures requirements for Program 3 processes can be found at 40 CFR §68.69. For your first RMP submission, enter the date you complied with the requirement of §68.69(a) (develop and implement written procedures) for the process or the date you last reviewed or revised the operating procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the operating procedures. Operating procedures may be reviewed or revised as a result of, among other things, a change to the process (see §§68.69(c) and 68.75(e)), annual certification of the operating procedures (see 68.69(c)), or a periodic audit of the prevention program (see §68.79(a)).

7.6. Training. The training requirements for Program 3 processes can be found at 40 CFR §68.71.

7.6.a. Date of most recent review or revision of training programs. For your first RMP submission, enter the date you ensured that the training you provide the employees operating the process meets the requirements of §68.71(a), or the date you last reviewed or revised your training programs, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the training you provide. Training programs may be reviewed or revised as a result of, among other things, a change to the process (see § 68.75(c)) or a periodic audit of the prevention program (see §68.79(a)). If the training was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.6.b. Type of training provided (select at least one).

1. Classroom
2. On the job
3. Other (specify)

7.6.c. Type of competency testing used (select at least one). Identify how employees were tested to determine and evaluate comprehension of the training materials.

1. Written test
2. Oral test
3. Demonstration
4. Observation
5. Other (specify)

7.7. Maintenance. The maintenance requirements for Program 3 processes can be found at 40 CFR §68.73. Enter the following:

7.7.a. The date that you most recently reviewed or revised the maintenance procedures. For your first RMP submission, enter the date you complied with the requirements of §68.73(b) (establish and implement written maintenance procedures) for the process, or the date you last reviewed or revised the maintenance procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the maintenance procedures. Maintenance procedures may be reviewed or revised as a result of, among other things, a change to the process (see § 68.75(c)) or a periodic audit of the prevention program (see §68.79(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.7.b. The date of the most recent equipment inspection or test

7.7.c. The equipment that were inspected or tested (list equipment).

7.8. Management of change. The management of change requirements for Program 3 processes can be found at 40 CFR §68.75. Enter the following:

7.8.a. The date of the most recent change (if any) that triggered the management of change procedure.

7.8.b. The date that you most recently reviewed or revised the management of change procedures at your site. For your first RMP submission, enter the date you complied with the requirements of 68.75(a) (establish and implement written procedures) for the process, or the date you last reviewed or revised the management of change procedures, whichever is later. (As

explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the procedures. Management of change procedures may be reviewed or revised as a result of, among other things, a periodic audit of the prevention program (see §68.79(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.9. Date of most recent pre-startup review. The pre-startup review requirements for Program 3 processes can be found at 40 CFR §68.77. Enter the date of the most recent pre-startup review (if any) for this process.

7.10. Compliance audits. The compliance audit requirements for Program 3 processes can be found at 40 CFR §68.79. If you did not conduct a compliance audit prior to submitting your first RMP (you are not required to do so), leave these fields blank.

7.10.a. Date of most recent compliance audit

7.10.b. Expected or actual date of completion of all changes resulting from the compliance audit. This may be left blank if there were no changes.

7.11. Incident investigation. The incident investigation requirements for Program 3 processes can be found at 40 CFR §68.81. Enter the following:

7.11.a. Date of your most recent incident investigation (if any). If you have not had an incident investigation, leave this field blank.

7.11.b. The expected or actual date of completion of all changes resulting from the incident investigation. This may be blank if there were no changes.

7.12. Date of most recent review or revision of employee participation plans. The employee participation requirements for Program 3 processes can be found at 40 CFR §68.83. For your first RMP submission, enter the date you complied with the requirements of §68.83(a) (develop a written plan) for the process, or the date you last reviewed or revised the employee participation plans, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the plan. Employee participation plans may be reviewed or revised as a result of, among other things, a periodic audit of the prevention program (see §68.79(a)). If the plan was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.13. Date of most recent review or revision of hot work permit procedures. The hot work permit requirements for Program 3 processes can be found at 40 CFR §68.85. For your first RMP submission, enter the date you complied with the requirement of §68.85 for the process or the date you last reviewed or revised the hot work permit procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of your hot work permit procedures. Hot work permit procedures may be reviewed or revised as a result of, among other things, a periodic audit of the prevention program (see §68.79(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.14. Date of most recent review or revision of contractor safety procedures. The contractor safety requirements for Program 3 processes can be found at 40 CFR §68.87. Leave this field blank if you do not have any contractors. Otherwise, for your first RMP submission, enter the date you complied with the requirements of §68.87(b)(4) (develop and implement safe work practices for contractors) for the process, or the date you last reviewed or revised the contractor safety procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the procedures. Contractor safety procedures may be reviewed or revised as a result of, among other things, a change to the process (see §68.75(c)) or a periodic audit of the prevention program (see §68.79(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

7.15. Date of most recent evaluation of contractor safety performance. Leave this field blank if you do not have any contractors or have not yet evaluated contractor performance. Otherwise, enter the date of your most recent evaluation of contractor safety performance. If you have more than one contractor involved in operating or maintaining the process, enter the date you completed your evaluations of all the contractors.

SECTION 8: PREVENTION PROGRAM FOR PROGRAM 2 PROCESSES

Complete this section for each prevention program you report.

Prevention program description. If different safeguards apply to different units in your process, use this field to explain how the prevention program for the process relates to the different units in the process. For example, "This process includes three interconnected production units, A, B, and C. Everything in this prevention program applies to all three units, with the following exceptions:
- The dates of the hazard review, which are 01/02/97, 6/5/96 and 4/3/96 for units A, B and C, respectively.
- Production unit A uses only a scrubber as a process control, while units B and C have relief valves and scrubbers.
- The water curtain indicated as a mitigation measure applies only to production unit C."

If you have so many "exceptions" that it gets too complicated to explain as above, but you still have many common data elements, you can report your prevention program on a unit-by-unit basis. To simplify such reporting, you can use the autocopy feature in RMP*Submit so that you only have to enter the common data elements once. First, enter the common elements into RMP*Submit (or the paper form, if you are submitting in paper), then hit the COPY function at the bottom of the screen to copy that information to another prevention program "record" (if you are submitting in paper, photocopy the pages). To complete the prevention program record for each unit, enter the remaining data which is unique to each.

8.1. NAICS code for the process. Enter the NAICS code that most closely corresponds to the process; it will not necessarily be the same NAICS code for your facility as a whole. The NAICS code that you choose must be one that you've already entered in the Registration Section for the covered process. If you have two processes with the same NAICS code, explain in the above description field which of the two processes this prevention program relates to. RMP*Submit will produce a list of the NAICS codes that you have already entered for your registered processes as a pick list for this data element. As described in the *Registration* section of this manual, the NAICS code system classifies businesses by type using descriptive categories that correspond to five-digit or six-digit codes.

8.2. Chemical name(s). For each prevention program, provide the names of all regulated substances held above the threshold in the covered units. If you have an NFPA-4 flammable mixture containing regulated flammables, you may list it as a “flammable mixture” and list all of the regulated substances contained in the mixture.

8.3. Safety information. The safety information requirements for Program 2 processes can be found at 40 CFR §68.48. Enter the following:

8.3.a. The date that you most recently reviewed or revised the safety information. For your first RMP submission, enter the date you complied with the safety information requirements of §68.48(a) (compile safety information) for the process, or the date you last reviewed or revised the safety information, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date the information was most recently reviewed or revised. Safety information may be reviewed or revised as a result of, among other things, a major change to the process (see §68.48(c)) or a periodic audit of the prevention program (see §68.58(a)). If the safety information

was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

8.3.b. Federal or state regulations or industry-specific design codes and standards used to demonstrate compliance with the safety information requirement (select at least one). Are you subject to any of the following Federal or state regulations? Do you use any of the following industry-specific design codes and standards to demonstrate compliance with the safety information requirement? If none are applicable, check "none."

8.3.b.1. NFPA 58 (or state law based on NFPA 58). – NFPA stands for National Fire Protection Association; NFPA 58 is a propane (LP gas) handling code. Note that state propane laws are generally based on NFPA 58. Select "NFPA 58" if your process is subject to a state or local law based on NFPA 58 or if you follow NFPA 58 in any event.

8.3.b.2. OSHA (29 CFR 1910.111) – OSHA's rule for operations handling anhydrous ammonia. Select "29 CFR 1910.111" if your process is subject to this rule.

8.3.b.3. ASTM Standards – Select this if you follow American Society of Testing Materials standards. ASTM establishes standards for materials, products, systems, test methods, specifications, classifications, definitions, and recommended practices.

8.3.b.4. ANSI Standards – Select this if you follow American National Standards Institute standards. ANSI nationally coordinates voluntary standards. ANSI standards cover areas as definitions, terminology, symbols, and abbreviations; materials, performance characteristics, procedure, and methods of rating; methods of testing and analysis; size, weight, and volume, safety, health, and building construction.

8.3.b.5. ASME Standards - Select this if you follow American Society of Mechanical Engineers standards. ASME conducts research and develops boiler, pressure vessel, and power test codes. It also develops safety codes and standards for equipment.

8.3.b.6. None – If your facility does not apply to the Program 2 process any national standards such as those noted above, and is not subject to any federal or state rules or laws such as those noted above, select "none."

8.3.b.7. Other (specify) – If you apply any other standards to your process safety equipment, select "other" and specify the standards you apply. Some examples of other standards include the National Electrical Manufacturers Association (NEMA) standards and the American Petroleum Institute (API) standards. There may also be other codes that apply.

8.3.b.8. Comments – In this section, please explain how federal, state or local regulations or industry-specific design codes and standards are being used to demonstrate compliance with the safety information requirement.

8.4. Hazard Review. The hazard review requirements for Program 2 processes can be found at 40 CFR §68.50. Enter the following:

8.4.a. The date of completion of the most recent hazard review or update (must be within the five years prior to submission of the RMP).

8.4.b. The expected or actual date of completion of all changes resulting from the hazard review. This may be blank if there were no changes.

8.4.c. Major hazards identified (select at least one). All major hazards that were identified for the Program 2 process or part of the process at your facility as a result of the hazard review. Major hazards are described in 7.4.d.

8.4.d. Process controls in use (select at least one). All of the process controls used on the Program 2 process or part of the process. Process controls are equipment and procedures used to prevent or limit releases. Process controls are described in 7.4.e. If none are applicable, check "none."

8.4.e. Mitigation systems in use (select at least one). All of the mitigation systems you have in place to control a release should one occur from the Program 2 process or part of the process. Mitigation systems are described in 7.4.f. If none are applicable, check "none."

8.4.f. Monitoring/detection systems in use (select at least one). All of the monitoring and detection systems installed to detect a release of a regulated substance from the Program 2 process or part of the process. Monitoring and detection systems are described in 7.4.g. If none are applicable, check "none."

8.4.g. Changes since last hazard review or hazard review update (select at least one). All of the changes made to the process or part of the Program 2 process since the last hazard review. Hazard review changes are described in 7.4.h. If none are applicable, check "none."

8.5. Date of most recent review or revision of operating procedures. The operating procedures requirements for Program 2 processes can be found in the RMP regulation at 40 CFR §68.52. For your first RMP submission, enter the date you complied with the requirements of §68.52(a) (prepare written procedures) for the process, or the date you last reviewed or revised the operating procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the operating procedures. Operating procedures may be reviewed or revised as a result of, among other things, a major change to the process (see §68.52(c)) or a periodic audit of the prevention program (see §68.58(a)). (See Chapter 7 of the *General Guidance for Risk Management Programs* for a discussion of what constitutes a major change.) If the operating procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

8.6. Training. Training requirements for Program 2 processes can be found at 40 CFR §68.54. Enter the following:

8.6.a. Date of most recent review or revision of training programs. For your first RMP submission, enter the date you complied with the requirements of §68.54(a) (training) for the process, or the date you last reviewed or revised the training programs, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the training you provide. Training programs may be reviewed or revised as a result of, among other things, a major change to the process (see § 68.54(d)) or a periodic audit of the prevention program (see §68.58(a)). If the training was not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

8.6.b. Type of training provided (select at least one).

1. Classroom
2. On the job
3. Other (specify)

8.6.c. Type of competency testing used (select at least one). Identify how employees were tested to determine and evaluate comprehension of the training materials.

1. Written test
2. Oral test
3. Demonstration
4. Observation
5. Other (specify)

8.7. Maintenance. The maintenance requirements for Program 2 processes can be found at 40 CFR §68.56. Enter the following:

8.7.a. The date that you most recently reviewed or revised the maintenance procedures. For your first RMP submission, enter the date you complied with the requirements of §68.56(a) (prepare and implement maintenance procedures) for the process, or the date you last reviewed or revised the maintenance procedures, whichever is later. (As explained in the introduction to Section 7, the date you enter may depend on whether you are subject to the same or similar requirement under other federal or state laws.) For subsequent RMPs, enter the date of the most recent review or revision of the maintenance procedures. Maintenance procedures may be reviewed or revised as a result of, among other things, a major change to the process (see §68.56(a)) or a periodic audit of the prevention program (see §68.58(a)). If the procedures were not reviewed or revised since the previous RMP was submitted, reenter the date provided in the previous RMP.

8.7.b. The date of the most recent equipment inspection or test

8.7.c. The equipment that were inspected or tested (list equipment).

8.8. Compliance Audits. The compliance audit requirements for Program 2 processes can be 40 CFR §68.58. If you did conduct a compliance audit prior to submitting your first RMP (you are not required to do so), leave these fields blank.

8.8.a. The date of your most recent compliance audit.

8.8.b. The expected or actual date of completion of all changes resulting from the compliance audit. This may be blank if there were no changes.

8.9. Incident Investigation. The incident investigation requirements for Program 2 processes can be found at 40 CFR §68.60. Enter the following:

8.9.a. The date of your most recent incident investigation (if any). If you have not had an incident investigation, leave this field blank.

8.9.b. The expected or actual date of completion of all changes resulting from the incident investigation. This may be blank if there were no changes.

8.10. Date of most recent change that triggered review or revision. Enter the date of the most recent change that triggered a review or a revision of safety information, the hazard review, operating or maintenance procedures, or training.

SECTION 9: EMERGENCY RESPONSE PROGRAM

Complete this section once for all covered processes.

The extent to which you need to fill out this portion of the RMP depends on whether your employees will respond to releases of regulated substances at your facility. Under §68.90(b), if your employees will *not* respond to releases, you are *not* required to comply with the requirements for an emergency response program *provided* you meet the following criteria: (1) if you hold one or more regulated toxic substances over threshold quantities, your facility must be included in the community emergency response plan developed under the Emergency Planning and Community Right-to-Know Act (EPCRA); (2) if you hold *only* one or more regulated flammable substances over threshold quantities, you must have coordinated response actions with the local fire department; and (3) you must have appropriate mechanisms in place to notify emergency responders when there is a need for a response.

If your employees will respond to releases of regulated substances at your facility, you are subject to §68.95 and must fill out all the data items in this section of the RMP. If your employees will *not* respond to releases of regulated substances at your facility, you need only respond to the first two (9.1.a & 9.1.b) and last three (9.7.a, 9.7.b, & 9.8) emergency response data elements.

9.1. Written emergency response (ER) plan

9.1.a. Is your facility included in the community emergency response plan? If your facility is subject to part 68 because it has one or more regulated toxic substances above threshold quantities, it is probably included in a local emergency response plan under the Emergency Planning and Community Right-to-Know Act (EPCRA). Under §303 of EPCRA, local emergency planning committees (LEPCs) must prepare an emergency response plan for facilities in their planning district having toxic substances listed under EPCRA §302 in excess of the threshold planning quantity established under that section. Most of the toxic substances listed in part 68 are also listed under EPCRA §302, and the EPCRA thresholds for those substances are generally the same or lower than the part 68 thresholds for the same substances. Consequently, part 68 facilities with toxic substances listed under both EPCRA and part 68 should be included in community emergency response plans.

In addition, facilities subject to part 68 as a result of flammable substances may also be covered by community emergency response plans, since LEPCs can, and sometimes do, include other hazardous substances, including flammables, in their plans. If you are not sure whether your facility is included in your community's local emergency plan, check with your LEPC.

As noted above, if your employees are *not* going to respond to releases of regulated substances at your facility and you have one or more part 68 regulated toxic substances over threshold quantities, your facility must be included in the local emergency response place under EPCRA.

Check this question if your facility is included in the community's emergency response plan.

9.1.b. Does your facility have its own written emergency response plan? Check this question if you have a response plan (not just an emergency action plan as required by OSHA under 29 CFR 1910.38).

9.2. Does your facility's ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?
9.3. Does your facility's ER plan include procedures for informing the public and local agencies responding to accidental releases?
9.4. Does your facility's ER plan include information on emergency health care?
These data elements (9.2, 9.3, 9.4) reflect the three mandatory components of the emergency response plan required under §68.95(a)(1). For an emergency response plan to be in compliance with this requirement, you must be able to answer "yes" to each of these questions.

9.5. Date of most recent review or update of your facility's ER plan.
Indicate the date on which you most recently reviewed or updated your plan. Section 68.95(a)(4) requires that ER plans be reviewed and updated "as appropriate" to reflect changes at the facility and to ensure that employees are informed of changes.

9.6. Date of the most recent ER training for your facility's employees.
Indicate the date of the most recent emergency response training at your facility. Emergency response training includes drills involving your personnel with or without outside emergency response agencies and tabletop exercises of your emergency response plan. Single purpose drills (e.g., alarm system drills) may be listed, but exercises that test more aspects of the plan are preferable.

Part 68 does not specify a schedule for conducting employee response training. You should note, however, that other planning requirements (e.g., HAZWOPER) may establish a more formal schedule for conducting training (e.g., eight hours of annual refresher training).

9.7.a-b. Local agency with which your facility's ER plan or response actions are coordinated. If you have an ER plan, indicate the name and phone number of the agency with whom you have coordinated your plan. Section 68.95(c) requires that a facility's ER plan be coordinated with the community emergency response plan under EPCRA for the facility's community. The LEPC for the facility's community will typically be the agency with which ER plans are coordinated.

If you do not have an ER plan, indicate the agency with which you have coordinated response activities. As noted above, §68.90(b) provides that if you have regulated toxic substances and your employees will *not* be responding to releases of those substances, your facility must be included in the community emergency response plan developed by the LEPC for your community. If that is the case for your facility, indicate the name and phone number of your LEPC here. If you have only regulated flammable substances and your employees will *not* be responding to releases of those substances, you must have coordinated response actions with the local fire department. If that is case for your facility, indicate the name and phone number of your local fire department here.

9.8. What other Federal or State emergency plan requirements is the facility subject to? Indicate all of the federal and state emergency response regulations or statutes to which your facility is subject. Select at least one. All RMP facilities are subject to OSHA emergency planning requirements at either 29 CFR 1910.38 or 29 CFR 1910.120.

a. OSHA Regulations at 29 CFR 1910.38. These are OSHA's Emergency Action Plan regulations. All RMP facilities are subject to either these OSHA regulations or OSHA regulations at 29 CFR 1910.120.

b. OSHA Regulations at 29 CFR 1910.120. These are OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) Plan regulations. All RMP facilities are subject to either these OSHA regulations or OSHA regulations at 29 CFR 1910.38.

c. Clean Water Act Regulations at 40 CFR 112. These are EPA's Oil Spill Prevention Control and Countermeasures (SPCC) regulations under the Clean Water Act.

d. RCRA Regulations at 40 CFR 264, 265, and 279.52. These are EPA's permitting regulations for solid waste under the Resource Conservation and Recovery Act (RCRA).

e. OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254. These are EPA, U.S. Coast Guard, Department of Transportation, and Department of the Interior facility response plan regulations under the Oil Pollution Act of 1990 (OPA 90).

f. State EPCRA Rules or Laws. These are state emergency planning and community right-to-know (EPCRA) laws. Federal EPCRA does not require facility response plans, but some state laws may.

g. Other. Specify any other emergency response regulations or laws to which your facility is subject.

3. GETTING READY TO SUBMIT

A. TO HELP ANSWER YOUR QUESTIONS...

For RMP policy interpretations and questions on specific data elements, call the Hotline at (800) 424-9346 or (703) 412-9810.

For answers to software questions or solutions to installation problems, contact the RMP Reporting Center at (703) 816-4434 (8am-4:30pm M-F) or via e-mail at: userrmp.usersupport@epcra.org.

B. WHEN IS MY RMP DUE?

Your RMP is due no later than the latest of the following dates:

-- June 21, 1999;

-- The date on which a regulated substance is first present above a threshold quantity in a process at your facility; or

-- Three years after the date on which a substance at your facility is first listed by EPA.

The postmark date will be used to determine whether you have submitted your RMP by the applicable due date and your 5-year anniversary date (§68.190 requires that your RMP be updated at least every five years). The RMP Reporting Center will record both the postmark date and the date your RMP was received. If the postmark date is illegible, the postmark date will be left blank and the date received will be used for purposes of determining compliance with the requirement to submit the RMP by the due date. Both "postmark date" and "date received" will be viewable in RMP*Info.

C. CAN I SUBMIT MY RMP BEFORE THE JUNE 21, 1999, DEADLINE?

RMP*Submit and the RMP paper form will be available January 4, 1999. You may submit your RMP any time after January 4, 1999. Your next RMP update will be due no later than 5 years from the postmark date of your last submission, even if you submit months prior to the June 21, 1999 deadline. RMPs will be posted to RMP*Info as they are received.

D. ELECTRONIC WAIVER - FORM AND INSTRUCTIONS.

Submit your RMP electronically on diskette. If you are unable to submit on diskette, you may use the paper form (provided in Appendix A). If you use the paper form, complete the Electronic Waiver Form (Appendix B) and submit it with your RMP.

E. SUBMITTING A "COMPLETE" RMP.

One advantage of submitting electronically (using RMP*Submit or a commercial RMP software package) is that you will be able to check whether your RMP is “complete” in the sense that you have provided information for the RMP data elements that every facility must complete. Using RMP*Submit, you can run the **CHECK** function (from the RMP List screen) to verify the “completeness” of your RMP at any time. The **CHECK** function will create an Error Report if your RMP is “incomplete.” It is important to note, however, that the “completeness” check provided by RMP*Submit is *not* a compliance check. It will not indicate whether your RMP meets all applicable part 68 requirements; it will only indicate that you have provided the right type of information for those data elements that every facility submitting an RMP must at a minimum complete. RMP*Submit cannot discern if you have provided correct information or if you should have completed data elements in addition to those required of every facility.

Consequently, you should not rely on RMP*Submit's "completeness" check to determine whether your RMP fully complies with the requirements of part 68.

When you are ready to submit your RMP, run the **SUBMIT** function (from the RMP List screen) to create your ASCII file for submission. RMP*Submit will once again run the validation program to check for "completeness."

If you used a commercial RMP software program, you can still use RMP*Submit to verify the "completeness" of your RMP. RMP*Submit can import an RMP ASCII file. Once a new ASCII file is imported, run the **CHECK** function to verify the "completeness." RMP*Submit will produce an Error Report if it detects that the RMP is not "complete" or that it contains any of the following errors:

1) Data elements which are needed for ASCII file generation have not been completed. RMPs that are missing the following data elements will not generate the ASCII file for submission:
--Facility name and address;
--For each process (section 1): program level, chemical name, CAS # and NAICS code;
--For each OCA section (sections 2-5): chemical name;
--For each Accident History (section 6): chemical name, CAS #, & date;
--For each Prevention Program (sections 7-8): NAICS, chemical name, CAS #.

2) Data elements which do not meet specific "validation" criteria. All data elements required for an RMP to be "complete" must contain a response that is appropriate for the kind of information requested or RMP*Submit will generate an Error Report. For example, all date fields must contain a 2-digit month between 01 and 12, a 2-digit day between 01 and 31, and a 4-digit year (MM/DD/YYYY). RMP*Submit will *not* indicate whether the date or other information provided is correct or meets regulatory requirements.

3) Data elements are inconsistent across sections of the RMP. For example, for every toxic chemical reported in the registration section for Programs 2 and 3, there must be a toxic alternative release scenario reported.

Errors generated in #2 & #3 above will still generate the ASCII file for submission. Therefore, you can choose to submit an RMP that is "incomplete," meaning it contains errors. However, if you submit an "incomplete" RMP, you will not be in compliance with the part 68 requirement to submit a RMP meeting all applicable regulatory requirements by the applicable due date.

The Reporting Center will process all RMPs using the same validation program found in RMP*Submit. If any of the fields needed for ASCII file generation are missing (which you will know if you use RMP*Submit), the Center will be unable to process your RMP and you will be so notified. If any other errors (like those in #2 & #3 above) are detected, an Error Report will be generated and the RMP will be marked as "incomplete." Both "complete" and "incomplete" RMPs will be posted on RMP*Info; those that are incomplete will include their Error Report. A copy of any Error Report generated for your RMP will be mailed to you with your notification letter. A list of RMPs that cannot be processed will also be posted on the Internet.

In addition to missing required fields, an RMP submitted on diskette will be unable to be processed for the following reasons:

--There is a virus on the diskette you submitted that could not be removed at our Reporting Center.

--The submitted diskette, or the ASCII file on the diskette you submitted, is unreadable.

--More than one Risk Management Plan was reported in a single submission.

F. CERTIFICATION.

Part 68 specifies that a signed certification statement must be sent with each RMP:

> ***68.185 Certification.***
>
> *(a) For Program 1 processes, the owner or operator shall submit in the RMP the certification statement provided in § 68.12(b)(4) of this part.*
>
> *(b) For all other covered processes, the owner or operator shall submit in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete.*

The certification statement must be signed by the owner or operator or a senior official with management responsibility for the person (or persons) completing the RMP. The owner, operator, or official must certify the accuracy and completeness of the RMP by signing and dating the certification statement. The statement applies to all the information supplied in the RMP and should be signed only after the form is complete. The name and title of the person signing the statement should be printed or typed on the certification. The certification statement submitted must bear the original signature of the person making the certification.

Sample certification letters are provided in Appendix C. In addition, RMP*Submit contains the text of the sample letters under the "Main Menu," –> "Tools," –> "Edit Certification Letters." You can cut and paste this text into your own word processing package to finalize and print the letter.

G. HOW TO LABEL YOUR SUBMISSION DISKETTE.

You must attach a label to each diskette (not the diskette's jacket). The label must be typed or legibly handwritten. A sample label with the necessary information is shown below. The types of packaging and shipping to use for submitting diskettes are left to your discretion.

RMP	
Facility Name	
Date: 6/1/1999	Disk 1 of 1
Contact: RMP Contact Name & Phone Number	

H. HOW TO ASSEMBLE YOUR COMPLETE RMP SUBMISSION PACKAGE.

Your package must include at least two items:

1. The RMP submitted on a diskette using either RMP*Submit or a commercial RMP software product in the required format, unless you do not have the capability to submit electronically. If you do not have the capability to submit electronically, you may submit your RMP using the RMP paper form, staple all the pages together and include a signed electronic waiver form (Appendix B). Include only 1 RMP on each diskette or form.

2. A certification statement for the entire RMP, signed (with an original signature) and dated.

Submit only 1 RMP and accompanying certification statement per envelope to ensure that the certification statement is applied to the appropriate RMP. If you are claiming CBI, additional items are requires; see *Chapter 4: Submitting CBI & Trade Secrets* for more information. Do not send other correspondence with your RMP.

If you have implementation questions, please contact your Implementing Agency. See Appendix G for a list of all State contacts. If your State is not listed in Appendix G, call your EPA Regional Office. See Appendix H for a list of EPA Regional contacts.

I. WHERE TO SEND COMPLETED RMP REPORTS:

Send reports by regular mail to:

RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346
Attention: Risk Management Plans

Send certified mail, overnight mail, and hand-delivered submissions **only** to:

RMP Reporting Center
c/o Computer Based Systems, Inc., Suite 300
4600 North Fairfax Drive
Arlington, VA 22203
Attention: Risk Management Plans

J. RECORD KEEPING

You are required to maintain records that support what is reported in your RMP and your implementation of the Risk Management Program for five years (40 CFR §68.200). EPA will maintain RMPs in RMP*Info for 15 years.

K. PAPERWORK REDUCTION ACT NOTICE

CAA section 112(r)(7)(B)(iii) requires that sources subject to this rule develop and submit an RMP. The information in the plan will be used by local agencies to improve response preparedness and response. Federal, state, and local agencies and the public will use the information to understand the hazards present at sources and to work with sources to improve prevention practices. EPA and states will use the data to determine whether additional efforts, either regulatory or voluntary, are needed to prevent accidents and to target those efforts. Except for confidential business information, information in the plan is available to the public under CAA section 114(c) and 40 CFR part 2. This information collection requirement complies with EPA's

confidentiality regulations (40 CFR Part 2).

The public reporting burden of the RMP requirement will depend on which part 68 program level applies to how many of the 64,200 sources subject to the RMP requirement. The public reporting burden for rule familiarization is estimated to range from 4 to 68 hours per source for all three program levels. The public reporting burden to prepare and submit the registration and other RMP elements is estimated to be 0.5 hours for sources with only Program 1 processes, between 6.0 and 11.25 hours for Program 2 sources, and between 6.25 and 30.5 hours for Program 3 sources. The public record keeping burden to maintain on-site documentation is estimated to range from 10 to 180 hours for Program 2 sources and from 52 to 1,200 hours for Program 3 sources. On-site documentation basis, which varies by rule element, must be developed and maintained on an ongoing; documentation must generally be maintained for five years.

The public reporting burden for the new RMP data elements published in the Federal Register January 6, 1999 (64 FR 964) is estimated to be 0.25 hours for all 64,200 sources, and the burden for CBI claims is estimated to be 9.5 hours for certain chemical manufacturing sources with Program 3 processes. Of the 9.5 hours of estimate, 8.5 hours is the burden estimated for documenting and submitting a CBI claim, and 1 hour is estimated for submitting the actual RMP CBI data.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503, “Attn.: Desk Officer for the EPA.” Include the OMB control number in any correspondence. Do not send the completed RMP form to this address.

L. Y2K PROBLEMS

Be sure to consider the impact of Year 2000 (Y2K) related date changes on your facility. The Y2K "bug" could affect your computer or process control systems. It could also affect water and electric supply, communications, and deliveries to or from customers. Make sure that possible disruptions do not lead to an accidental release.

4. SUBMITTING CBI & TRADE SECRETS

On January 6, 1999, EPA published a final rule in the Federal Register specifying which RMP data elements may not be claimed as confidential business information (CBI) or trade secret and what procedures must be followed to claim information as CBI. The new regulatory provisions, at sections 68.151 and 68.152, provide that if you claim any RMP information as CBI, you must submit to EPA a sanitized RMP (either on diskette or paper), a Substantiation Form (for explaining why you believe the information meets the criteria for CBI), and an Unsanitized Data Elements Form (on paper only) (see Appendices D & E for forms). **The sanitized, or redacted, RMP should not include any CBI.** Any CBI included in a sanitized RMP (either in diskette or paper form) will be automatically loaded into RMP*Info and will be available to the public. Report any information claimed as CBI only on the Unsanitized Data Elements Form. The Unsanitized Data Elements Form is only for those data elements that you are claiming as CBI, not for the entire RMP.

For a data element that requires you to report information that you believe meets the applicable criteria for CBI , you may claim the information as CBI in one of the following ways:

> **If you are submitting on diskette** - Check the CBI box at the top of the screen where that data element appears and leave the field blank.
>
> **If you are submitting on the RMP Paper Form** - Write "CBI" in the space provided for that data element on the sanitized RMP.

However, if you are claiming **chemical name** as CBI, you must report one of the following generic chemical categories. These will appear in the chemical pick lists in RMP*Submit once you check the CBI box at the top of the screen.

CBI Acids
CBI Amines, Ammonia, and Hydrazines
CBI Arsenic and Phosphorus Compounds
CBI Boron Compounds
CBI Carbonyl Compounds
CBI Cyanides and Nitriles
CBI Esters, Alcohols, Aldehydes, and Furans
CBI Halogenated Organic Compounds
CBI Halogens and Halogen Oxides
CBI Isocyanates and Isothiocyanates
CBI Nitrogen Oxides and Organic Nitro Compounds
CBI Organic Silanes
CBI Oxiranes and Azirdines
CBI Selenium and Sulfer Compounds
CBI Flammable Substance

In summary, a complete RMP package with a CBI claim must include #1, #2, #4 & #5, and possibly #3:

1. A sanitized, complete RMP in which the data elements claimed CBI are left blank except for an indication that the information has been claimed as CBI (e.g., for RMPs on diskette, the "CBI" box has been checked). This should be submitted on diskette or on the paper RMP form. This version of the RMP will be in RMP*Info, the publicly accessible database.

2. Sanitized CBI Substantiation Form(s) (Appendix D). If your explanation of why information is CBI entails providing other information you believe is CBI, you must complete two versions of the CBI Substantiation Form -- a sanitized version and an unsanitized version. The sanitized version should omit the information you claim is confidential and leave in its place the notation "information claimed confidential." The sanitized form should be submitted on paper <u>only</u>. If you are claiming multiple data elements as CBI, you may need multiple substantiation forms. All pages of all forms must be stapled together. Sanitized Substantiation Forms will be available to the public on request.

3. Unsanitized CBI Substantiation Form(s) (Appendix D). If your substantiation includes CBI, you must also include an unsanitized version of a completed CBI Substantiation Form that provides the information that you claim is CBI. This should be submitted on paper <u>only</u>. If you are claiming multiple data elements, you will need multiple substantiation forms. All pages of all forms must be stapled together.

4. An Unsanitized CBI Data Elements Form (Appendix E) that provides the RMP information that you claim is CBI. This should be submitted on paper <u>only</u>. Staple all pages together.

5. Certification Letter - signed and dated.

An RMP submission that claims CBI and does not contain the proper forms, will be considered "incomplete."

5. WHAT TO EXPECT AFTER YOU SUBMIT.

Once your RMP is processed, you will be notified regarding the submission status of your RMP. Notification should be within several weeks, except in the first several months following the June 21, 1999 submission deadline. It is expected that the majority of RMPs due by June 21, 1999 will be sent to the RMP Reporting Center just before the deadline. EPA anticipates it will take until the end of August to process those RMPs. As a result, your notification letter may be delayed. EPA apologizes for any delay and encourages submitters to submit their RMP well before the June 1999 deadline to avoid the delayed notification. Remember, you should "CHECK" your RMP using RMP*Submit before it is submitted to be sure you are submitting a plan that is free of the kinds of errors described previously. The notification will contain the following information:

(1) Your new RMP Identification Number.

Each facility will be assigned a unique RMP Identification Number. Save this Identification Number. You will need it for all subsequent RMP submissions, corrections , and correspondence.

(2) Complete/Incomplete Status of your submitted RMP.

Once your RMP is received at the RMP Reporting Center, it will be screened for the kind of errors described previously. If any such errors are found, you will receive an Error Report. Please note that this Error Report will also be posted with your RMP on the Internet. Refer to *Chapter 6: Revisions to your RMP*, for instructions on how to correct any errors you may have.

(3) The postmark date of your RMP.

You must update your RMP at least every five years. The five-year anniversary for updating your RMP will be calculated based on the postmark date of your last RMP submission. Since you may not know the exact postmark date, we will provide it to you for your records. Note, however, that §68.190(b) requires you to update your RMP under several different circumstances, some or all of which could occur before the fifth anniversary of your last RMP submission.

(4) If you submitted on paper, we will send you a paper copy of the printout of your RMP. Paper submittals will be entered into RMP*Info manually by data entry staff. You will receive a print out of your RMP as it appears in RMP*Info, the publicly accessible database.

6. REVISIONS TO YOUR RMP

A. CORRECTIONS

If you receive a notification letter from the RMP Reporting Center that informs you that your RMP was "incomplete," you will want to correct the errors noted in the accompanying Error Report. You may also discover other errors on your own or want to make minor administrative changes such as provide a new phone number or contact name. You do not have to update your entire RMP when you make such corrections or administrative changes. Further, making corrections or administrative changes will not affect the five-year anniversary date for updating your RMP.

To make corrections or administrative changes to an electronically submitted RMP, revise the original RMP as needed and submit the revised RMP on diskette. If you submitted on paper, make the changes in red ink on the printout of your RMP submission (which the Reporting Center will mail back to you with your notification letter). You must also submit a new certification letter for these corrections. A sample certification letter for corrections/updates can be found in Appendix C.

When you are ready to "Submit" your corrected RMP, RMP*Submit will prompt you for:
Submission Type:

- G **First-time RMP Submission**
  Correction to my current RMP
- G **Re-Submission (all 9 sections are updated and certified)**

Be sure to check the "correction" box. The RMP Reporting Center will treat correction RMPs in the same manner as initial RMPs and re-submissions. It will read the diskette, run the validation program, post the new RMP (and a new Error Report if there is one) in RMP*Info, and notify you of the results. It will not change the five-year anniversary date for updating your RMP.

B. RE-SUBMISSIONS

You must fully update your RMP no later than 5 years after the postmark date of your last submission, or sooner if any of the changes specified in §68.190(b) (see box below) occur.

> **68.190 Updates**.
> (b) The owner or operator of a stationary source shall revise and update the RMP submitted under § 68.150 as follows:
> (1) Within five years of its initial submission or most recent update required by paragraphs (b)(2)-(b)(7) of this section, whichever is later.
> (2) No later than three years after a newly regulated substance is first listed by EPA;
> (3) No later than the date on which a new regulated substance is first present in an already covered process above a threshold quantity;
> (4) No later than the date on which a regulated substance is first present above a threshold quantity in a new process;
> (5) Within six months of a change that requires a revised PHA or hazard review;
> (6) Within six months of a change that requires a revised offsite consequence analysis as provided in §68.36; and
> (7) Within six months of a change that alters the Program level that applied to any covered process.

To submit a "re-submission," you must update all nine sections of your RMP. If you submitted electronically, revise your previous RMP as appropriate and submit the updated RMP on diskette. You must also submit a new certification letter for the updated RMP that covers all the information in the RMP. A sample certification letter can be found in Appendix C. Re-submissions will re-set the 5-year anniversary date by which you must next update your RMP.

When you are ready to "Submit" your updated RMP, RMP*Submit will prompt you for:
Submission Type:

- G **First-time RMP Submission**
- G **Correction to my current RMP**
- **Re-Submission (all 9 sections are updated and certified)**

Be sure to check the "Re-Submission" box. The RMP Reporting Center will treat all RMPs in the same manner. It will read the diskette, run the validation program, post the new RMP (and a new Error Report if there is one) in RMP*Info, and notify you of the results.

C. DE-REGISTRATION

Changes may occur at your facility that make it no longer subject to part 68 (e.g., you replace the regulated substances in your processes with unregulated substances). In that event, you should submit a letter to the RMP Reporting Center within six months and include the effective date of the de-registration (the date on which your facility was no longer covered by part 68). The letter should be signed by the owner or operator and include your RMP ID number. RMP*Submit will generate this letter for you by running the **DE-REGISTER** function (from the Main Menu).

Mail the signed letter to:

RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346
Attention: Risk Management Plans

If your facility de-registers and later becomes subject to the RMP regulation again , you will need to submit a new RMP. Submit the new RMP as a re-submission (see **RE-SUBMISSIONS** above) using your previous EPA Facility ID#.

De-registered facilities will be noted as such in RMP*Info. De-registered RMPs will remain in RMP*Info for 15 years.

7. STATE-SPECIFIC INFORMATION

States may take delegation of the RMP Program under section 112(l) of the Clean Air Act by adopting a program that is at least as stringent as the federal program and obtaining EPA approval of that program. The aspects of a state RMP program that are submitted under section 112(l), once approved by EPA, are federally enforceable. See 40 C.F.R. Part 63, Subpart E.

A number of states are taking delegation of the section 112(r) program in their state. Several of these states will regulate chemicals that are not listed in the federal section 112(r) program. At least two states (Louisiana and Rhode Island) are including some of those additional chemicals in their section 112(l) submittal to EPA; those chemicals will become part of the federally enforceable program in those states if EPA approves the programs. Louisiana and Rhode Island have worked with EPA to include those additional chemicals in RMP*Submit. Below is a list of the chemicals Louisiana and Rhode Island are adding and that you will see in RMP*Submit if your facility is located in either of those states. Louisiana and Rhode Island facilities should use RMP*Submit to report both EPA and State-only chemicals.

New Jersey is also taking delegation of the section 112(r) program and, will regulate some chemicals that are not listed in the federal section 112(r) program. Unlike Louisiana and Rhode Island, however, New Jersey is not including its additional chemicals in its section 112(l) submittal to EPA. As a result, those additional chemicals will not be part of the federally approved program and will not be subject to federally enforceable RMP requirements. At New Jersey's request, EPA has included the state's additional chemicals in RMP*Submit's "pick list" of chemicals so that New Jersey facilities may use RMP*Submit for reporting on those chemicals to New Jersey. (All State-only chemicals are identified as such in the chemical pick list.) However, the RMP sent to EPA should *not* contain any information pertaining to New Jersey's additional chemicals. Facilities in New Jersey that have both EPA-listed *and* New Jersey-listed chemicals in more than threshold quantities must fill out two RMPs: one to be sent to EPA and one to be sent to New Jersey. The RMP to be sent to EPA should include only information relating to EPA-listed chemicals. The RMP to be sent to New Jersey should include information on *both* EPA-listed and New Jersey-listed chemicals (because New Jersey, if it obtains delegation, will have authority to enforce both the federal and state-only aspects of the RMP program in that state). It is important that the RMP sent to EPA not include the New Jersey-only information for two reasons. First, EPA's electronic program for processing RMPs will not be able to process RMPs containing information on New Jersey's additional chemicals. Second, certain information, such as the worst-case scenario submitted for compliance with the federally enforceable program cannot be based on a New Jersey-only chemical. For example, the overall worst-case scenario for a facility with both EPA-listed and New Jersey-listed chemicals might involve a New Jersey-listed chemical, but the federally enforceable RMP must address the worst-case scenario for the federally enforceable (i.e. EPA-listed) chemicals. It would thus be advisable for New Jersey facilities with both EPA-listed and New Jersey-listed chemicals to fill out their federally enforceable RMP first, and then use that as the basis for filling out the RMP to be sent to New Jersey covering both EPA-listed and New Jersey-listed chemicals. For additional guidance for those chemicals that are listed on both the EPA and New Jersey RMP list at different concentrations levels, contact New Jersey DEP, Bureau of Chemical Release Information and Prevention at (609) 633-7289.

Besides adding chemicals, states taking delegation of the section 112(r) program may establish additional control or procedural requirements for facilities in their states (e.g., requirements to alert specified agencies in case of release). If submitted (as part of the delegation package) and approved, those additional requirements will become federally enforceable. RMP*Submit, however, does *not* have a mechanism for providing any information with respect to such additional requirements. Check with your Implementing

Agency to see if there are any additional requirements applicable to your facility and what reporting requirements might apply. A list of State contacts can be found in Appendix G. New Jersey will publish an addendum to the RMP*Submit User Manual for New Jersey facilities which will include instructions for additional questions required by New Jersey. The addendum will be available after March 1999 from the NJ DEP web site (www.state.nj.us/dep/enforcement/relprev/tcpa/) or by calling (609) 633-7289.

Additional State Chemicals to be addressed in RMP sent to EPA
Nitrogen tetroxide (LA)
Hydrochloric acid (conc 30% or greater) (RI)
Hydrogen fluoride/Hydrofluoric acid (conc 40% or greater) (RI)
Nitric acid (conc 40% or greater) (RI)

Additional State Chemicals to be addressed in RMP sent to EPA	Toxic or Flammable
Nitrogen tetroxide (LA)	Toxic
Hydrochloric acid (conc 30% or greater) (RI)	Toxic
Hydrogen fluoride/Hydrofluoric acid (conc 40% or greater) (RI)	Toxic
Nitric acid (conc 40% or greater) (RI)	Toxic

8. GLOSSARY OF ACRONYMS & TERMS

CBI	Confidential Business Information
CPU	Central Processing Unit
DLL	Dynamic Link Library
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know
GPF	General Protection Fault
MB	Megabyte(s)
NAICS	North American Industrial Classification System
OCA	Offsite Consequence Analysis
Pick List	A list of items to choose for an answer.
POTWs	Publicly Owner Treatment Works
RAM	Random Access Memory
RMP	Risk Management Plan
VGA	Video Graphics Adapter

Risk Management Plan Form

Section 112(r) of the Clean Air Act

Form Approved: 2/22/1999
OMB Control Number: 2050-0144

IMPORTANT: Type or print; read instructions before completing form.

Submission Type:	**Where to Send Completed Forms:**
❑ First-Time RMP Submission ❑ Correction to My Current RMP ❑ Re-Submission (all 9 sections are updated and certified)	RMP Reporting Center P.O. Box 3346 Merrifield, VA 22116-3346 Attention: RMP*Submit

Facility Name: _____

____ – ____ – ____
EPA Facility ID# (leave blank for first submission only)

ES Executive Summary

(attach a separate piece of paper if you need additional space)

EPA Risk Management Plan

Facility Name: _____

EPA Facility ID# (leave blank for first submission only)

1 Section 1. Registration

1.1 Source Identification

1.1.a. Facility Name (maximum 50 characters)

1.1.b. Parent Company #1 Name (maximum 50 characters)

1.1.c. Parent Company #2 Name (maximum 50 characters)

1.2. EPA Facility Identifier (12 characters)

(leave blank for first submission only)

1.3. Other EPA Systems Facility Identifier (15 characters)

1.4. Dun and Bradstreet Numbers (DUNS) (9 characters)

1.4.a. Facility DUNS	1.4.b. Parent Company #1 DUNS	1.4.c. Parent Company #2 DUNS

1.5 Facility Location

1.5.a. Street - Line 1 (maximum 35 characters)

1.5.b. Street - Line 2 (maximum 35 characters)

1.5.c. City (maximum 19 characters)

1.5.d. State

1.5.e. Zip Code Zip +4 Code

1.5.f. County (maximum 20 characters)

1.5.g. Facility Latitude (report in degrees, minutes, and seconds)

+/- D D M M S S . S

1.5.h. Facility Longitude (report in degrees, minutes, and seconds)

+/- D D D M M S S . S

1.5.i. Method for determining Lat/Long (see User Manual for codes)

1.5.j. Description of location identified by Lat/Long (see User Manual for codes)

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

1 Section 1. Registration

1.6. Owner or Operator

1.6.a. Name (maximum 35 characters)
1.6.b. Phone ( ) -

Owner or Operator Mailing Address

1.6.c. Street - Line 1 (maximum 35 characters)	
1.6.d. Street - Line 2 (maximum 35 characters)	
1.6.e. City (maximum 19 characters)	1.6.f. State
1.6.g. Zip Code – Zip +4 Code	

1.7. Name and title of person or position responsible for RMP (part 68) implementation

1.7.a. Name of person (maximum 35 characters)	1.7.b. Title of person or position (maximum 35 characters)

1.8. Emergency Contact

1.8.a. Name (maximum 35 characters)	1.8.b. Title of person or position (maximum 35 characters)
1.8.c. Phone ( ) -	1.8.d. 24-Hour Phone ( ) -
1.8.e. 24-Hour Phone Extension/PIN # (maximum 35 characters)	

1.9. Other Points of Contact (Optional)

1.9.a. Facility or Parent Company E-mail Address (maximum 100 characters)	1.9.b. Facility Public Contact Phone Number ( ) -
1.9.c. Facility or Parent Company WWW Homepage Address (maximum 100 characters)	

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

1 Section 1. Registration

1.10. Local Emergency Planning Committee (LEPC) (optional) (maximum 30 characters)

1.11. Number of full-time employees (FTEs) on site

1.12. Covered by (select all that apply)

- ❑ 1.12.a. OSHA PSM
- ❑ 1.12.b. EPCRA section 302
- ❑ 1.12.c. CAA Title V Air Operating Permit Program. If covered, specify permit ID# below.

1.13. OSHA Star or Merit Ranking (optional)

❑ Yes ❑ No

1.14. Last Safety Inspection (by an External Agency) Date

M M D D Y Y Y Y

1.15. Last Safety Inspection Performed by an External Agency (select one)

- ❑ 1.15.a. OSHA
- ❑ 1.15.b. State occupational safety agency
- ❑ 1.15.c. EPA
- ❑ 1.15.d. State environmental agency
- ❑ 1.15.e. Fire department
- ❑ 1.15.f. Never had one
- ❑ 1.15.g. Other (specify) (maximum 50 characters)

_____

_____

1.16. Will this RMP involve Predictive Filing? (optional)

❑ Yes ❑ No

Facility Name: _____

EPA Facility ID# (leave blank for first submission only)

1 Section 1. Registration

1.17. Process Specific Information. For each covered process, fill in this page. If you are reporting more than one process, make a photocopy of this page and report each process on a separate sheet.

Process ID# (optional–for your reference only)

Process Description (optional–for your reference only)

1.17.a. Program Level (select one)

❑ 1 ❑ 2 ❑ 3

1.17.b. NAICS Code(s) (five or six digits)

1.17.c. Chemical(s) (regulated substance(s))

1.17.c.1. Name (maximum 100 characters)	1.17.c.2. CAS Number (10 characters)	1.17.c.3. Quantity (lbs) (max. 12 chars.)

If you need more space to list NAICS codes or chemicals, please make a photocopy of this sheet.

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

2 Section 2. Toxics: Worst Case

(If you need to report a worst-case scenario, make a photocopy of pages 2-1 and 2-2 and report each scenario separately)

2.1. Chemical

2.1.a. Name (maximum 100 characters)

2.1.b. Percent weight of chemical (if in a mixture)

___ . ___ %

2.2. Physical state (select one)

- ❑ 2.2.a. Gas
- ❑ 2.2.b. Liquid
- ❑ 2.2.c. Gas liquified by pressure
- ❑ 2.2.d. Gas liquified by refrigeration

2.3. Model Used (select one or enter another model name in Other below)

- ❑ 2.3.a. EPA's OCA Guidance Reference Tables or Equations
- ❑ 2.3.b. EPA's RMP Guidance for Ammonia Refrigeration Reference Tables or Equations
- ❑ 2.3.d. EPA's RMP Guidance for Waste Water Treatment Plants Reference Tables or Equations
- ❑ 2.3.e. EPA's RMP Guidance for Warehouses Reference Tables or Equations
- ❑ 2.3.f. EPA's RMP Guidance for Chemical Distributors Reference Tables or Equations
- ❑ 2.3.g. EPA's RMP*Comp™
- ❑ 2.3.h. Areal Locations of Hazardous Atmospheres (ALOHA®)
- ❑ 2.3.z. Other model (specify) (maximum 255 characters)

_____

2.4. Scenario (select one)

- ❑ 2.4.a. Gas Release
- ❑ 2.4.b. Liquid Spill and Vaporization

2.5. Quantity released (lbs)

_____

2.6. Release rate (lbs/minute)

_____ . ___

2.7. Release duration (minutes)

____ . ___

2.8. Wind speed (meters/second)

____ . ___

2.9. Atmospheric stability class (A-F)

___

2.10. Topography (select one)

- ❑ 2.10.a. Urban
- ❑ 2.10.b. Rural

2.11. Distance to endpoint (miles)

___ . ___

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

2 Section 2. Toxics: Worst Case

2.12. Estimated residential population within distance to endpoint (numeric)

___ , ___ , ___

2.13. Public receptors within distance to endpoint (select all that apply)

- ❑ 2.13.a. Schools
- ❑ 2.13.b. Residences
- ❑ 2.13.c. Hospitals
- ❑ 2.13.d. Prison/Correctional Facilities
- ❑ 2.13.e. Recreation Areas
- ❑ 2.13.f. Major commercial, office, or industrial areas
- ❑ 2.13.g. Other (specify) (maximum 200 characters)

_____

_____

_____

2.14. Environmental receptors within distance to endpoint (select all that apply)

- ❑ 2.14.a. National or State Parks, Forests, or Monuments
- ❑ 2.14.b. Officially Designated Wildlife Sanctuaries, Preserves, or Refuges
- ❑ 2.14.c. Federal Wilderness Area
- ❑ 2.14.d. Other (specify) (maximum 200 characters)

_____

_____

2.15. Passive mitigation considered (select all that apply)

- ❑ 2.15.a. Dikes
- ❑ 2.15.b. Enclosures
- ❑ 2.15.c. Berms
- ❑ 2.15.d. Drains
- ❑ 2.15.e. Sumps
- ❑ 2.15.f. Other (specify) (maximum 200 characters)

_____

_____

2.16. Graphics file name (optional) (maximum 12 characters)

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only)

3 Section 3. Toxics: Alternative Releases

(If you need to report more than one alternative release scenario, make a copy of pages 3-1 and 3-2 and report each scenario separately)

3.1. Chemical

3.1.a. Name (maximum 100 characters)

3.1.b. Percent weight of chemical (if in a mixture)

___ . ___ %

3.2. Physical State (select one)

- ❑ 3.2.a. Gas
- ❑ 3.2.b. Liquid
- ❑ 3.2.c. Gas liquified by pressure
- ❑ 3.2.c. Gas liquified by refrigeration

3.3. Model Used (select one or enter another model name in Other below)

- ❑ 3.3.a. EPA's OCA Guidance Reference Tables or Equations
- ❑ 3.3.b. EPA's RMP Guidance for Ammonia Refrigeration Reference Tables or Equations
- ❑ 3.3.d. EPA's RMP Guidance for Waste Water Treatment Plants Reference Tables or Equations
- ❑ 3.3.e. EPA's RMP Guidance for Warehouses Reference Tables or Equations
- ❑ 3.3.f. EPA's RMP Guidance for Chemical Distributors Reference Tables or Equations
- ❑ 3.3.g. EPA's RMP*Comp™
- ❑ 3.3.h. Areal Locations of Hazardous Atmospheres (ALOHA®)
- ❑ 3.3.z. Other model (specify) (maximum 200 characters)

_____

3.4. Scenario (select one)

- ❑ 3.4.a. Transfer hose failure
- ❑ 3.4.b. Pipe leak
- ❑ 3.4.c. Vessel leak
- ❑ 3.4.d. Overfilling
- ❑ 3.4.e. Rupture disk/relief valve failure
- ❑ 3.4.f. Excess flow device failure
- ❑ 3.4.g. Other (specify) (maximum 35 characters)

_____

_____

3.5. Quantity released (lbs)

3.6. Release rate (lbs/minute) ___ . ___

3.7. Release duration (minutes) ___ . ___

3.8. Wind speed (meters/second) ___ . ___

3.9. Atmospheric stability class (A-F)

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

3 Section 3. Toxics: Alternative Releases

3.10. Topography (select one)

- ❑ 3.10.a. Urban
- ❑ 3.10.b. Rural

3.11. Distance to endpoint (miles)

___ . ___

3.12. Estimated residential population within distance to endpoint

___ , ___ , ___

3.13. Public receptors within distance to endpoint (select all that apply)

- ❑ 3.13.a. Schools
- ❑ 3.13.b. Residences
- ❑ 3.13.c. Hospitals
- ❑ 3.13.d. Prisons/Correctional facilities
- ❑ 3.13.e. Recreation areas
- ❑ 3.13.f. Major commercial, office, or industrial areas
- ❑ 3.13.g. Other (specify) (maximum 200 characters)

_____

3.14. Environmental receptors within distance to endpoint (select all that apply)

- ❑ 3.14.a. National or State Parks, Forests, or Monuments
- ❑ 3.14.b. Officially Designated Wildlife Sanctuaries, Preserves, or Refuges
- ❑ 3.14.c. Federal Wilderness Area
- ❑ 3.14.d. Other (specify) (maximum 200 characters)

_____

_____

3.15. Passive mitigation considered (select all that apply)

- ❑ 3.15.a. Dikes
- ❑ 3.15.b. Enclosures
- ❑ 3.15.c. Berms
- ❑ 3.15.d. Drains
- ❑ 3.15.e. Sumps
- ❑ 3.15.f. Other (specify) (maximum 200 characters)

_____

3.16. Active mitigation considered (select all that apply)

- ❑ 3.16.a. Sprinkler systems
- ❑ 3.16.b. Deluge systems
- ❑ 3.16.c. Water curtain
- ❑ 3.16.d. Neutralization
- ❑ 3.16.e. Excess flow valve
- ❑ 3.16.f. Flares
- ❑ 3.16.g. Scrubbers
- ❑ 3.16.h. Emergency shutdown systems
- ❑ 3.16.i. Other (specify) (maximum 200 characters)

_____

_____

3.17 Graphics file name (optional) (maximum 12 characters)

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

4 Section 4. Flammables: Worst Case

(If you need to report more than one worst-case scenario, make a photocopy of pages 4-1 and 4-2 and report each scenario separately)

4.1. Chemical Name (maximum 100 characters)

4.2. Model Used (select one or enter another model name in Other below)

- ❑ 4.2.a. EPA's OCA Guidance Reference Tables or Equations
- ❑ 4.2.c. EPA's RMP Guidance for Propane Storage Facilities Reference Tables or Equations
- ❑ 4.2.d. EPA's RMP Guidance for Waste Water Treatment Plants Reference Tables or Equations
- ❑ 4.2.e. EPA's RMP Guidance for Warehouses Reference Tables or Equations
- ❑ 4.2.f. EPA's RMP Guidance for Chemical Distributors Reference Tables or Equations
- ❑ 4.2.g. EPA's RMP*Comp™
- ❑ 4.2.z. Other model (specify) (maximum 235 characters)

_____

4.3. Scenario (only one option)

Vapor Cloud Explosion

4.4. Quantity released (lbs)

4.5. Endpoint Used (only one option)

1 PSI

4.6. Distance to endpoint (miles)

4.7. Estimated residential population within distance to endpoint

4.8. Public receptors within distance to endpoint (select all that apply)

- ❑ 4.8.a. Schools
- ❑ 4.8.b. Residences
- ❑ 4.8.c. Hospitals
- ❑ 4.8.d. Prisons/Correctional Facilities
- ❑ 4.8.e. Recreation Areas
- ❑ 4.8.f. Major commercial, office, or industrial areas
- ❑ 4.8.g. Other (specify) (maximum 200 characters)

_____

_____

4.9. Environmental receptors within distance to endpoint (select all that apply)

- ❑ 4.9.a. National or State Parks, Forests, or Monuments
- ❑ 4.9.b. Officially Designated Wildlife Sanctuaries, Preserves, or Refuges
- ❑ 4.9.c. Federal Wilderness Area
- ❑ 4.9.d. Other (specify) (maximum 200 characters)

_____

_____

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

4 Section 4. Flammables: Worst Case

4.10. Passive mitigation considered (select all that were considered in defining the release quantity or rate for the worst-case scenario)

❑ 4.10.a. Blast walls

❑ 4.10.b. Other (specify) (maximum 200 characters)

_____

_____

4.11. Graphics file name (optional) (maximum 12 characters)

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

5 Section 5. Flammables: Alternative Releases

(If you need to report more than one alternative release scenario, make a copy of pages 5-1 and 5-2 and report each scenario separately)

5.1. Chemical Name (maximum 100 characters)

5.2. Model Used (select one or enter another model name in Other below)

- ❑ 5.2.a. EPA's OCA Guidance Reference Tables or Equations
- ❑ 5.2.c. EPA's RMP Guidance for Propane Storage Facilities Reference Tables or Equations
- ❑ 5.2.d. EPA's RMP Guidance for Waste Water Treatment Plants Reference Tables or Equations
- ❑ 5.2.e. EPA's RMP Guidance for Warehouses Reference Tables or Equations
- ❑ 5.2.f. EPA's RMP Guidance for Chemical Distributors Reference Tables or Equations
- ❑ 5.2.g. EPA's RMP*Comp™
- ❑ 5.2.z. Other model (specify) (maximum 255 characters)

_____

5.3. Scenario (select one)

- ❑ 5.3.a. Vapor cloud explosion
- ❑ 5.3.b. Fireball
- ❑ 5.3.c. BLEVE
- ❑ 5.3.d. Pool fire
- ❑ 5.3.e. Jet fire
- ❑ 5.3.f. Vapor cloud fire
- ❑ 5.3.g. Other (specify) (maximum 30 characters)

_____

_____

5.4. Quantity released (lbs)

_____

5.5. Endpoint used (select one)

- ❑ 5.5.a. 1 PSI
- ❑ 5.5.b. 5 kw/m^2 for 40 seconds
- ❑ 5.5.c. Lower flammability limit (specify) ___ . ___

5.6. Distance to endpoint (miles)

___ . ___

5.7. Estimated residential population within distance to endpoint

___ , ___ , ___

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

5 Section 5. Flammables: Alternative Releases

5.8. Public receptors within distance to endpoint (select all that apply)

- ❑ 5.8.a. Schools
- ❑ 5.8.b. Residences
- ❑ 5.8.c. Hospitals
- ❑ 5.8.d. Prisons/Correctional facilities
- ❑ 5.8.e. Recreation areas
- ❑ 5.8.f. Major commercial, office, or industrial areas
- ❑ 5.8.g. Other (specify) (maximum 200 characters)

_____

_____

5.9. Environmental receptors within distance to endpoint (select all that apply)

- ❑ 5.9.a. National or State Parks, Forests, or Monuments
- ❑ 5.9.b. Officially Designated Wildlife Sanctuaries, Preserves, or Refuges
- ❑ 5.9.c. Federal Wilderness Area
- ❑ 5.9.d. Other (specify) (maximum 200 characters)

_____

_____

5.10. Passive mitigation considered (select all that apply)

- ❑ 5.10.a. Dikes
- ❑ 5.10.b. Fire walls
- ❑ 5.10.c. Blast walls
- ❑ 5.10.d. Enclosures
- ❑ 5.10.e. Other (specify) (maximum 200 characters)

_____

_____

5.11. Active mitigation considered (select all that apply)

- ❑ 5.11.a. Sprinkler system
- ❑ 5.11.b. Deluge system
- ❑ 5.11.c. Water curtain
- ❑ 5.11.d. Excess flow valve
- ❑ 5.11.e. Other (specify) (maximum 200 characters)

_____

_____

5.12. Graphics file name (optional) (maximum 12 characters)

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

6 Section 6. Five-Year Accident History

(If you need to report more than one accident history, make a photocopy of pages 6-1 through 6-3 and report each accident separately)

Would you like to certify that your facility *did not have* any reportable accidents in the last 5 years?

❑ Yes; leave the rest of this section blank ❑ No; fill out this section for each accident

6.1. Date of accident (day, month, and year)

M M D D Y Y Y Y

6.2. Time accident began (hours and minutes)

H H M M ❑ a.m. ❑ p.m.

6.3. NAICS code of process involved

6.4. Release duration (hours and minutes)

H H H M M

6.5. Chemical(s) released (if you need more space to list chemicals, please make a photocopy of this sheet)

6.5.a.i. Chemical name (maximum 100 characters)	6.5.a.ii CAS number	6.5.b. Quantity released (lbs.)	6.5.c. Percent weight of chemical if in a mixture (toxics only)
			. %
			. %
			. %
			. %

6.6. Release event (select at least one)

❑ a. Gas release
❑ b. Liquid spill/evaporation
❑ c. Fire
❑ d. Explosion

6.7. Release source (select at least one)

❑ a. Storage vessel
❑ b. Piping
❑ c. Process vessel
❑ d. Transfer hose
❑ e. Valve
❑ f. Pump
❑ g. Joint
❑ h. Other (specify) (maximum 200 characters)

_____

_____

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

6 Section 6. Five-Year Accident History

6.8. Weather conditions at time of event

a.i. Wind speed (numerical) ___.___	Wind speed unit ❑ miles/hr. ❑ knots ❑ meters/sec.	a.ii. Wind direction ___
b. Temperature (°F) ___	c. Atmospheric stability class (A-F) ___	❑ d. Precipitation present
❑ e. Unknown weather conditions (check if a-d are all unknown)		

6.9. On-site Impacts

a. Deaths (enter numbers)		b. Injuries (enter numbers)	
a.i. Employees or contractors	___	b.i. Employees or contractors	___
a.ii. Public responders	___	b.ii. Public responders	___
a.iii. Public	___	b.iii. Public	___
c. Property damage $ ___,___,___			

6.10. Known off-site impacts (enter numbers)

a. Deaths	___	d. Evacuated	___
b. Hospitalizations	___	e. Sheltered-in-place	___
c. Other medical treatment	___	f. Property damage ($):	___

6.10.g. Environmental damage (select all that apply)

❑ g.1. Fish or animal kills
❑ g.2. Tree, lawn, shrub, or crop damage
❑ g.3. Water contamination
❑ g.4. Soil contamination
❑ g.5. Other (specify) (maximum 200 characters)

_____

_____

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

6 Section 6. Five-Year Accident History

6.11. Initiating event (select one)

- ❑ a. Equipment failure
- ❑ b. Human error
- ❑ c. Natural (weather conditions, earthquake)
- ❑ d. Unknown

6.12. Contributing factors (select all that apply)

- ❑ a. Equipment failure
- ❑ b. Human error
- ❑ c. Improper procedure
- ❑ d. Overpressurization
- ❑ e. Upset condition
- ❑ f. By-pass condition
- ❑ g. Maintenance activity/inactivity
- ❑ h. Process design failure
- ❑ i. Unsuitable equipment
- ❑ j. Unusual weather conditions
- ❑ k. Management error
- ❑ l. Other (specify) (maximum 200 characters)

_____

_____

6.13. Off-site responders notified (select one)

- ❑ a. Notified only
- ❑ b. Notified and responded
- ❑ c. No, not notified
- ❑ d. Unknown

6.14. Changes introduced as a result of the accident (select at least one)

- ❑ a. Improved/upgraded equipment
- ❑ b. Revised maintenance
- ❑ c. Revised training
- ❑ d. Revised operating procedures
- ❑ e. New process controls
- ❑ f. New mitigation systems
- ❑ g. Revised emergency response plan
- ❑ h. Changed process
- ❑ i. Reduced inventory
- ❑ j. None
- ❑ k. Other (specify) (maximum 200 characters)

_____

_____

_____

_____

Are you claiming confidential business information in this section? ❑

EPA Risk Management Plan

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

7 Section 7. Prevention Program: Program 3

(If you need to report more than one prevention program, make a photocopy of pages 7-1 through 7-4 and report each separately)

Prevention program description:

_____

7.1 NAICS code for process

| | | | | | |

7.2 Chemical name(s) (maximum 100 characters)	

If you need more space to list chemicals, please make a photo copy of this sheet.

7.3. Date on which the safety information was last reviewed or revised

M M D D Y Y Y Y

7.4. Process Hazards Analysis (PHA)

7.4.a. Date of last PHA or PHA update

M M D D Y Y Y Y

7.4.b. Technique used (select at least one)

- ❑ 7.4.b.1. What If
- ❑ 7.4.b.2. Checklist
- ❑ 7.4.b.3. What If/Checklist (combined)
- ❑ 7.4.b.4. HAZOP
- ❑ 7.4.b.5. Failure Mode & Effects Analysis
- ❑ 7.4.b.6. Fault Tree Analysis
- ❑ 7.4.b.7. Other (Specify) (maximum 200 characters)

_____

_____

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

7 Section 7. Prevention Program: Program 3

7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update

M M D D Y Y Y Y

7.4.d. Major hazards identified (select at least one)

- ❑ 7.4.d.1. Toxic release
- ❑ 7.4.d.2. Fire
- ❑ 7.4.d.3. Explosion
- ❑ 7.4.d.4. Runaway reaction
- ❑ 7.4.d.5. Polymerization
- ❑ 7.4.d.6. Overpressurization
- ❑ 7.4.d.7. Corrosion
- ❑ 7.4.d.8. Overfilling
- ❑ 7.4.d.9. Contamination
- ❑ 7.4.d.10. Equipment failure
- ❑ 7.4.d.11. Loss of cooling, heating, electricity, instrument air
- ❑ 7.4.d.12. Earthquake
- ❑ 7.4.d.13. Floods (flood plain)
- ❑ 7.4.d.14. Tornado
- ❑ 7.4.d.15. Hurricanes
- ❑ 7.4.d.16. Other (specify) (maximum 200 characters)

_____

7.4.e. Process controls in use (select at least one)

- ❑ 7.4.e.1. Vents
- ❑ 7.4.e.2. Relief valves
- ❑ 7.4.e.3. Check valves
- ❑ 7.4.e.4. Scrubbers
- ❑ 7.4.e.5. Flares
- ❑ 7.4.e.6. Manual shutoffs
- ❑ 7.4.e.7. Automatic shutoffs
- ❑ 7.4.e.8. Interlocks
- ❑ 7.4.e.9. Alarms and procedures
- ❑ 7.4.e.10. Keyed bypass
- ❑ 7.4.e.11. Emergency air supply
- ❑ 7.4.e.12. Emergency power
- ❑ 7.4.e.13. Backup pump
- ❑ 7.4.e.14. Grounding equipment
- ❑ 7.4.e.15. Inhibitor addition
- ❑ 7.4.e.16. Rupture disks
- ❑ 7.4.e.17. Excess flow device
- ❑ 7.4.e.18. Quench system
- ❑ 7.4.e.19. Purge system
- ❑ 7.4.e.20. None
- ❑ 7.4.e.21. Other (specify) (maximum 200 characters)

_____

7.4.f. Mitigation systems in use (select at least one)

- ❑ 7.4.f.1. Sprinkler system
- ❑ 7.4.f.2. Dikes
- ❑ 7.4.f.3. Fire walls
- ❑ 7.4.f.4. Blast walls
- ❑ 7.4.f.5. Deluge system
- ❑ 7.4.f.6. Water curtain
- ❑ 7.4.f.7. Enclosure
- ❑ 7.4.f.8. Neutralization
- ❑ 7.4.f.9. None
- ❑ 7.4.f.10. Other (specify) (maximum 200 characters)

_____

7.4.g. Monitoring/detection systems in use (select at least one)

- ❑ 7.4.g.1. Process area detectors
- ❑ 7.4.g.2. Perimeter monitors
- ❑ 7.4.g.3. None
- ❑ 7.4.g.4. Other (specify) (maximum 200 characters)

_____

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

7 Section 7. Prevention Program: Program 3

7.4.h. Changes since last PHA or PHA update (select at least one)

- ❑ 7.4.h.1. Reduction in chemical inventory
- ❑ 7.4.h.2. Increase in chemical inventory
- ❑ 7.4.h.3. Change in process parameters
- ❑ 7.4.h.4. Installation of process controls
- ❑ 7.4.h.5. Installation of process detection systems
- ❑ 7.4.h.6. Installation of perimeter monitoring systems
- ❑ 7.4.h.7. Installation of mitigation systems
- ❑ 7.4.h.8. None recommended
- ❑ 7.4.h.9. None
- ❑ 7.4.h.10. Other (specify) (maximum 200 characters)

_____

_____

7.5 Date of most recent review or revision of operating procedures

M M D D Y Y Y Y

7.6 Training

7.6.a. Date of most recent review or revision of training programs

M M D D Y Y Y Y

7.6.b. Type of training provided (select at least one)

- ❑ 7.6.b.1. Classroom
- ❑ 7.6.b.2. On the job
- ❑ 7.6.b.3. Other (specify) (maximum 200 characters) _____

7.6.c. Type of competency testing used (select at least one)

- ❑ 7.6.c.1. Written test
- ❑ 7.6.c.2. Oral test
- ❑ 7.6.c.3. Demonstration
- ❑ 7.6.c.4. Observation
- ❑ 7.6.c.5. Other (specify) (maximum 200 characters)

_____

7.7. Maintenance

7.7.a. Date of most recent review or revision of maintenance procedures

M M D D Y Y Y Y

7.7.b. Date of most recent equipment inspection or test

M M D D Y Y Y Y

7.7.c. Equipment most recently inspected or tested (list equipment) (maximum 200 characters)

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

7 Section 7. Prevention Program: Program 3

7.8. Management of Change

7.8.a. Date of most recent change that triggered management of change procedures	M M D D Y Y Y Y
7.8.b. Date of most recent review or revision of management of change procedures	M M D D Y Y Y Y
7.9. Date of most recent pre-startup review	M M D D Y Y Y Y

7.10. Compliance audits

7.10.a. Date of most recent compliance audit	M M D D Y Y Y Y
7.10.b. Expected or actual date of completion of all changes resulting from the compliance audit	M M D D Y Y Y Y

7.11. Incident investigation

7.11.a. Date of your most recent incident investigation (if any)	M M D D Y Y Y Y
7.11.b. Expected or actual date of completion of all changes resulting from the incident investigation	M M D D Y Y Y Y

7.12. Date of most recent review or revision of employee participation plans	M M D D Y Y Y Y
7.13. Date of most recent review or revision of hot work permit procedures	M M D D Y Y Y Y
7.14. Date of most recent review or revision of contractor safety procedures	M M D D Y Y Y Y
7.15. Date of most recent evaluation of contractor safety performance	M M D D Y Y Y Y

Are you claiming confidential business information in this section? ☐

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

8 Section 8. Prevention Program: Program 2

(If you need to report more than one prevention program, make a photocopy of pages 8-1 through 8-4 and report each separately)

Prevention program description:

_____

8.1. NAICS Code for process:

8.2. Chemical name(s): (maximum 100 characters)

If you need more space to list chemicals, please make a photo copy of this sheet.

8.3. Safety information

8.3.a. Date of most recent review or revision of safety information M M D D Y Y Y Y

8.3.b. Federal/state regulations or industry-specific design codes and standards used to demonstrate compliance with the safety information requirement (select at least one)

- ❑ 8.3.b.1. NFPA 58 (or state law based on NFPA 58)
- ❑ 8.3.b.2. OSHA (29 CFR 1910.111)
- ❑ 8.3.b.3. ASTM Standards
- ❑ 8.3.b.4. ANSI Standards
- ❑ 8.3.b.5. ASME Standards
- ❑ 8.3.b.6. None
- ❑ 8.3.b.7. Other (specify) (maximum 200 characters)
- ❑ 8.3.b.8. Comments (maximum 100 characters)

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

8 Section 8. Prevention Program: Program 2

8.4. Hazard review

8.4.a. Date of completion of most recent hazard review or update

M M D D Y Y Y Y

8.4.b. Expected or actual date of completion of all changes resulting from the hazard review

M M D D Y Y Y Y

8.4.c. Major hazards identified (select at least one)

- ❑ 8.4.c.1. Toxic release
- ❑ 8.4.c.2. Fire
- ❑ 8.4.c.3. Explosion
- ❑ 8.4.c.4. Runaway reaction
- ❑ 8.4.c.5. Polymerization
- ❑ 8.4.c.6. Overpressurization
- ❑ 8.4.c.7. Corrosion
- ❑ 8.4.c.8. Overfilling
- ❑ 8.4.c.9. Contamination
- ❑ 8.4.c.10. Equipment failure
- ❑ 8.4.c.11. Loss of cooling, heating, electricity, instrument air
- ❑ 8.4.c.12. Earthquake
- ❑ 8.4.c.13. Floods (flood plain
- ❑ 8.4.c.14. Tornado
- ❑ 8.4.c.15. Hurricanes
- ❑ 8.4.c.16. Other (specify) (maximum 200 characters)

_____

_____

8.4.d. Process controls in use (select at least one)

- ❑ 8.4.d.1. Vents
- ❑ 8.4.d.2. Relief valves
- ❑ 8.4.d.3. Check valves
- ❑ 8.4.d.4. Scrubbers
- ❑ 8.4.d.5. Flares
- ❑ 8.4.d.6. Manual shutoffs
- ❑ 8.4.d.7. Automatic shutoffs
- ❑ 8.4.d.8. Interlocks
- ❑ 8.4.d.9. Alarms and procedures
- ❑ 8.4.d.10. Keyed bypass
- ❑ 8.4.d.11. Emergency air supply
- ❑ 8.4.d.12. Emergency power
- ❑ 8.4.d.13. Backup pump
- ❑ 8.4.d.14. Grounding equipment
- ❑ 8.4.d.15. Inhibitor addition
- ❑ 8.4.d.16. Rupture disks
- ❑ 8.4.d.17. Excess flow device
- ❑ 8.4.d.18. Quench system
- ❑ 8.4.d.19. Purge system
- ❑ 8.4.d.20. None
- ❑ 8.4.d.21. Other (specify) (maximum 200 characters)

_____

_____

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

8 Section 8. Prevention Program: Program 2

8.4.e. Mitigation systems in use (select at least one)

- ❑ 8.4.e.1. Sprinkler system
- ❑ 8.4.e.2. Dikes
- ❑ 8.4.e.3. Fire walls
- ❑ 8.4.e.4. Blast walls
- ❑ 8.4.e.5. Deluge system
- ❑ 8.4.e.6. Water curtain
- ❑ 8.4.e.7. Enclosure
- ❑ 8.4.e.8. Neutralization
- ❑ 8.4.e.9. None
- ❑ 8.4.e.10. Other (specify) (maximum 200 characters)

_____

_____

8.4.f. Monitoring/detection systems in use (select at least one)

- ❑ 8.4.f.1. Process area detectors
- ❑ 8.4.f.2. Perimeter monitors
- ❑ 8.4.f.3. None
- ❑ 8.4.f.4. Other (specify) (maximum 200 characters)

_____

_____

8.4.g. Changes since last hazard review or hazard review update (select at least one)

- ❑ 8.4.g.1. Reduction in chemical inventory
- ❑ 8.4.g.2. Increase in chemical inventory
- ❑ 8.4.g.3. Change in process parameters
- ❑ 8.4.g.4. Installation of process controls
- ❑ 8.4.g.5. Installation of process detection systems
- ❑ 8.4.g.6. Installation of perimeter monitoring systems
- ❑ 8.4.g.7. Installation of mitigation systems
- ❑ 8.4.g.8. None recommended
- ❑ 8.4.g.9. None
- ❑ 8.4.g.10. Other (specify) (maximum 200 characters)

_____

_____

8.5. Date of most recent review or revision of operating procedures

M M D D Y Y Y Y

8.6. Training

8.6.a. Date of most recent review or revision of training programs

M M D D Y Y Y Y

8.6.b. Type of training provided (select at least one)

- ❑ 8.6.b.1. Classroom
- ❑ 8.6.b.2. On the job
- ❑ 8.6.b.3. Other (specify) (maximum 200 characters)

_____

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

8 Section 8. Prevention Program: Program 2

8.6.c. Type of competency test used (select at least one)

- ❑ 8.6.c.1. Written test
- ❑ 8.6.c.2. Oral test
- ❑ 8.6.c.3. Demonstration
- ❑ 8.6.c.4. Observation
- ❑ 8.6.c.5. Other (specify) (maximum 200 characters)

_____

_____

8.7. Maintenance

8.7.a. Date of most recent review or revision of maintenance procedures

M M D D Y Y Y Y

8.7.b. Date of most recent equipment inspection or test

M M D D Y Y Y Y

8.7.c. Equipment most recently inspected or tested (list equipment) (maximum 200 characters)

8.8. Compliance audits

8.8.a. Date of most recent compliance audit

M M D D Y Y Y Y

8.8.b. Expected or actual date of completion of all changes resulting from the compliance audit

M M D D Y Y Y Y

8.9. Incident investigation

8.9.a. Date of your most recent incident investigation (if any)

M M D D Y Y Y Y

8.9.b. Expected or actual date of completion of all changes resulting from the incident investigation

M M D D Y Y Y Y

8.10. Date of most recent change that triggered a review or a revision of safety information, the hazard review, operating or maintenance procedures, or training

M M D D Y Y Y Y

Are you claiming confidential business information in this section? ❑

Facility Name: _____

EPA Facility ID# (leave blank for first submission only) ____ – ____ – ____

9 Section 9. Emergency Response

9.1. Written emergency response (ER) plan

9.1.a. ❑ Is your facility included in the written community emergency response plan?

9.1.b. ❑ Does your facility have its own written emergency response plan?

9.2. ❑ Does your facility's ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?

9.3. ❑ Does your facility's ER plan include procedures for informing the public and local agencies responding to accidental releases?

9.4. ❑ Does your facility's ER plan include information on emergency health care?

9.5. Date of most recent review or update of your facility's ER plan M M D D Y Y Y Y

9.6. Date of most recent ER training for your facility's employees M M D D Y Y Y Y

9.7. Local agency with which your facility's ER plan or response activities are coordinated

9.7.a. Name of agency (maximum 35 characters)

9.7.b. Phone number ( ) -

9.8. Subject to (select all that apply)

❑ 9.8.a. OSHA Regulations at 29 CFR 1910.38
❑ 9.8.b. OSHA Regulations at 29 CFR 1910.120
❑ 9.8.c. Clean Water Act Regulations at 40 CFR 112
❑ 9.8.d. RCRA Regulations at 40 CFR 264, 265, 279.52
❑ 9.8.e. OPA-90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, 30 CFR 254
❑ 9.8.f. State EPCRA Rules or Laws
❑ 9.8.g. Other (specify) (maximum 200 characters)

_____

_____

Are you claiming confidential business information in this section? ❑

APPENDIX B

Form Approved: February 22, 1999
OMB Control Number: 2050-0144

ELECTRONIC WAIVER FORM

Facility Name:_____

EPA Facility ID#: GGGG - GGGG - GGGG
(Leave blank for first submission only)

Risk Management Plan Electronic Waiver Form

Note: check all that apply.

(1) The reason(s) I am not submitting in electronic format is:

- G I have no computers on site
- G The software is incompatible (Ex: I only have access to a Macintosh computer)
- G Other (specify)_____
_____

(2) I considered alternative means to file electronically (visiting a local copy store which rents computers, going to my State or local government office to use their computer, etc.), but for the following reason I am not submitting in electronic format:

- G No commercial or public computer access available within 5 miles
- G Contractor costs too great
- G Computer use rental/lease costs too great
- G No trained personnel
- G Other (specify)_____

_____	_____
Signature	Print Name
_____	_____
Title	Date

EPA Form 8700-26 (Date 2/1999)

APPENDIX C

SAMPLE CERTIFICATION LETTERS

Certification Statement for Program 1 Process(es):

Based on the criteria in 40 CFR 68.10, the distance to the specified endpoint for the worst-case accidental release scenario for the following process(es) is less than the distance to the nearest public receptor:

- [insert description for first program 1 process from executive summary]
- [insert description for second program 1 process from executive summary]]
- etc.

Within the past five years, the process(es) has (have) had no accidental release that caused offsite impacts provided in the risk management program rule (40 CFR 68.10(b)(1)). No additional measures are necessary to prevent offsite impacts from accidental releases. In the event of fire, explosion, or a release of a regulated substance from the process(es), entry within the distance to the specified endpoints may pose a danger to public emergency responders. Therefore, public emergency responders should not enter this area except as arranged with the emergency contact indicated in the RMP. The undersigned certifies that, to the best of my knowledge, information, and belief, formed after reasonable inquiry, the information submitted is true, accurate, and complete.

_____	_____
Signature	Print Name
_____	_____
Title	Date

Certification Statement for Program Level 2 & 3 Processes:

To the best of the undersigned's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete.

_____	_____
Signature	Print Name
_____	_____
Title	Date

Certification Statement for a Correction:

To the best of the undersigned's knowledge, information, and belief formed after reasonable inquiry, these corrections and/or administrative changes are true, accurate, and complete.

_____	_____
Signature	Print Name
_____	_____
Title	Date

EPA Facility ID # GGGG - GGGG - GGGG

APPENDIX D

Form Approved: February 22, 1999
OMB Control Number: 2050-0144

CBI SUBSTANTIATION FORM

If you are claiming Confidential Business Information (CBI) in your Risk Management plan (RMP), you must substantiate your claim at the same time that you submit your RMP. To qualify for CBI protection, the substantive criteria in 40 CFR 2.301 must be met. Certain RMP data elements cannot be claimed CBI, as stated in 40 CFR 68.151.

Fill out this form for each data element or set of data elements that have a discrete substantiation. You may use one CBI Substantiation Form to report multiple data elements as CBI if the basis for substantiation is the same. That means the answers to the questions in Part IV must be the same for all the data elements. If you need more space in Part III, please attach a separate piece of paper.

Burden Statement

The public reporting and recordkeeping burden for this collection of information is estimated to average 8.5 hours per claim. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M St., S.W., Washington D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed CBI substantiation to this address.

Part I -- Facility Identification Information

The information given here must correspond to the information that you provided in the registration section of your RMP. If you have an EPA Facility ID #, please include this information. If you are resubmitting, updating or correcting your RMP, you should already have received an EPA Facility ID#.

a. Facility Name:
b. EPA Facility ID # (if assigned): GGGG - GGGG - GGGG

EPA Form 8700-27 (Date 2/1999)

c. Facility Location Address:
d. City, State and Zip Code:
e. Dun and Bradstreet Number:
Part II – Is this substantiation a sanitized or an unsanitized version? If this substantiation contains any CBI, you must also submit a sanitized substantiation (without CBI data) as stated in 40 CFR 68.152. In this case, submit 2 copies of this form, one sanitized and one unsanitized. Please indicate here whether this form is sanitized or unsanitized. G **Sanitized** G **Unsanitized**
Part III – List the RMP Data Elements which you are claiming CBI that are covered in this substantiation form. List the data element number and its descriptive name, but NOT the actual CBI data. Please note that you may use one substantiation form for more than one data element only if the answers to all of the questions in Part IV are the same for those data elements.

Data Element #	Data Element Name

Part IV – The following are criteria set forth in 40 CFR §§ 2.204, 2.208 and 2.301 for substantiating CBI claims. Provide answers to each of the following questions to substantiate your claim. If you need additional space, use separate sheets of paper.
(a) For any data elements that you wish to claim CBI that are listed in Part III, please indicate whether your business has previously submitted a CBI claim for this data element to EPA and whether that claim has expired, been waived, or been withdrawn.
(b) What reasonable measures have you taken to protect the confidentiality of the information and do you intend to continue to take these measures?

(c)	**Have you disclosed the information to anyone other than a governmental body? If so, why should the information still be considered confidential? If not, is the information reasonably obtainable without your consent? Has EPA or another Federal agency made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.**
(d)	**Does any statute require public disclosure of the information for which you are claiming CBI? If so, identify the law.**

(e)	**(1) For each data element claimed as CBI in Part III, discuss with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. For example, how could your competitors make use of this information to your detriment?**
	(2) Do you assert that the information is "voluntarily submitted" as defined at 40 CFR 2.201(i)? If so, explain why, and how disclosure would tend to lessen the Governments's ability to obtain necessary information in the future.

Part V - Certification (Read and sign after completing all sections)
To the best of the undersigned's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete.

Name and official title of owner or operator or senior management official	
Signature (All signatures must be original)	**Print Name**
Official Title	**Date Signed**

APPENDIX E

Form Approved: February 22, 1999
OMB Control Number: 2050-0144

CBI UNSANITIZED DATA ELEMENT FORM

If you are claiming Confidential Business Information (CBI) in your RMP, you must submit in paper form both the information being claimed CBI and a substantiation for your claim at the time you submit your redacted or "sanitized" RMP . This form should be used to submit the confidential information. The redacted RMP will be made available to the public in RMP*Info.

If you need additional space, make a copy of page 2 of this form.

Part I. Facility Identification Information
The information given here should correspond to the information that you filled out in the registration section of your RMP. If you have an EPA Facility ID#, please include this information. You will have received the number after your first submission.

a. Facility Name:
b. EPA Facility ID # (if assigned): GGGG - GGGG - GGGG
c. Facility Location Address:
d. City, State and Zip Code:
e. Dun and Bradstreet Number:

Part II - Information claimed as CBI
Please list the data element number(s) from the RMP form (paper form or electronic form), the name(s) of the element(s) you are claiming CBI, and the actual CBI data.

Data Element Number	Name of Data Element	RMP Data Claimed as CBI

EPA Form 8700-28 (Date 2/1999)

Data Element Number	Name of Data Element	RMP Data Claimed as CBI

APPENDIX F

HOW TO REPORT YOUR FACILITY LATITUDE AND LONGITUDE

There are four data elements to report for latitude and longitude:

1.5.g. Latitude
1.5.h. Longitude
1.5.i. Lat/Long Method
1.5.j. Lat/long Description

* *

Choosing your Description

You will first need to choose your Lat/Long **"Description"** which represents the exact location of your latitude and longitude values. The most common Lat/Long **"Descriptions"** are "PG" for **P**lant **G**ate or entrance and "CE" indicates the **CE**nter of your facility. RMP*Submit and the User Manual contain a list of codes to be used for this element.

* *

Choosing your Method

Next, you need to choose a **"Method"** for determining your Lat/Long. RMP*Submit and the User Manual contain a list of codes to be used for this element. There are four general methods to determine your site latitude and longitude: Global Positioning Systems (GPS); Geographic Information Systems (GIS); Internet-based address finders; and paper maps. These methods are described below in order of accuracy (GPS is the most accurate way to determine a lat/long, paper maps is the least accurate method). Although it is preferable that you use the most accurate method available to you, all four methods are acceptable.

1. **Global Positioning Systems (GPS).** If you have access to a GPS unit, take the reading at the place specified by the Lat/Long **"Description**" that you choose. Most GPS units allow you to choose between display in decimal degrees and degrees/minutes/seconds. You should choose degrees/minutes/seconds, since that is the required format for latitude and longitude. If you can only get the reading in decimal degrees, you will have to convert it (see conversion instructions below or RMP*Submit's conversion tool).

   To answer **1.5.i. "Method" for determining Lat/Long** , enter one of the values "G1" through "G7" from the list which represent specific types of **G**PS unit, or "GO" (GPS-**O**ther/ unspecified).

2. **Geographic Information Systems (GIS).** If you have your own GIS, navigate to your street and pinpoint the exact location that you choose for your Lat/Long **"Description"** field (1.5.j). Your GIS should report (usually on a status bar) the latitude and longitude of the focus point or map marker. Your GIS should also allow a preference for display in degrees/minutes/seconds rather than decimal degrees. If you can only get the reading in decimal degrees, you will have to convert it (see conversion instructions below or RMP*Submit's conversion tool).
   If you do not own a GIS, you can download a free "mini" GIS system called LandView™. It will give you a map of your county with lat/long coordinates. Visit the CEPPO Homepage at

http://www.epa.gov/ceppo/tools.html for more information.

To answer **1.5.i. "Method" for determining Lat/Long** on your RMP, enter "I4" which represents "Interpolation - Digital map source (TIGER): derived from a digital map, mapping software or mapping tool."

3. **Internet-based address finders.** There are numerous Internet sites for viewing maps and finding specific locations. The one that seems best suited for quick determination of latitude and longitude is at:

http://www.etakguide.com/#FindLocation

This system requests an address, and optionally a cross street. Since exact address matching is not available for many parts of the country, supplying a cross street helps the system to draw a map that is near your location. Once the map is drawn, click on the "Lat/Long" button above the map, then click on the map at the location that you choose for your Lat/Long **"Description"** field (1.5.j). The system will display the latitude and longitude in decimal degrees. You will have to convert to degrees/minutes/seconds (see conversion instructions below or RMP*Submit's conversion tool). Other Internet-based mapping tools can be found at:

http://www.mapblast.com
http://tiger.census.gov/cgi-bin/mapbrowse-tbl

To answer **1.5.i. "Method" for determining Lat/Long**, enter "I4" which represents "Interpolation - Digital map source (TIGER): derived from a digital map, mapping software or mapping tool."

4. **Paper maps.** Choose a map that shows a relatively small area, and that has latitude/longitude tick marks along the edges. A county map book with a small section of the county on each page, or a USGS topographic map is ideal. County map books are available in many public libraries, bookstores and office supply stores. USGS maps are available in many libraries or may be purchased directly from the USGS by submitting a written request to:

Distribution Branch of the USGS
P.O. Box 25286
Denver Federal Center
Denver, CO 90225
Phone: (303) 236-7477.

Do not use a common road atlas with one state map per page or state highway maps because they generally show too large an area to obtain adequate latitude/longitude value.

After finding your exact location on the map, see where that point lies in relation to the latitude and longitude tick marks. Latitude runs north-south and longitude runs east-west. As an example, if your latitude is half way between 38º 40' 00" (translated as 38 degrees, 40 minutes, 0 seconds), and 38º 50' 00", your latitude would be half way between the two latitude values, or 38º 45' 00". If your latitude is three-quarters of the way between the two tick marks, it would be 38º 47' 30". Perform the same exercise to determine longitude.

To answer **1.5.i. "Method" for determining Lat/Long**, enter "I1" which represents "Interpolation – Map: derived from a paper or other non-digital map."

* *

Reporting Latitude and Longitude

Once you have your latitude and longitude values, you'll need to make sure they are in the proper format, you will report latitude and longitude coordinates in ***"degrees, minutes, and seconds."***

The format for the RMP is: Latitude: +/-D D M M S S . S Longitude: +/-D D D M M S S . S

Enter only numerical data. Do not preface numbers with letters such as N or W to denote the hemisphere. For RMP*Submit, the default for the hemisphere is "+" for east and north. However because "+" is assumed by the system, you must leave that space blank for east and north. For west and south, enter a negative, "-," as the first character. Enter both latitude and longitude to the nearest second.

Be careful not to reverse your latitude and longitude coordinates. Latitude in the 48 contiguous states ranges from 25° to 49°, while longitude ranges from 72° to 124°.

* *

Converting decimal degrees to degrees/minutes/seconds

If your GIS, GPS, or Internet-based mapping tool provides latitude and longitude only in decimal degrees, you must convert to degrees/minutes/seconds. RMP*Submit has an automatic latitude/longitude conversion utility.

These instructions use the following decimal degree values as an example:

latitude	**38.327654**	[38.327654 degrees North Latitude]
longitude	**-98.887435**	[98.887435 degrees West Longitude]

Step one: The value for Degrees is the same for both decimal degrees and degrees/minutes/seconds. Use the number to the left of the decimal point for degrees. Reserve the remainder (after the decimal point) for steps two and three. For this example,

latitude degrees =	**38**	[38 degrees North Latitude]
longitude degrees =	**-98**	[98 degrees West Longitude]

Step two: The value for Minutes is the decimal portion of the degrees times 60. For this example,

latitude minutes: 60 minutes times .327654 = 19.65924, or **19 minutes**

longitude minutes: 60 minutes times .887435 = 53.2461, or **53 minutes**.

Use the numbers to the left of the decimal point for minutes. The remainder to the right of the decimal point are used to determine the seconds.

Step three: The value for Seconds is the decimal portion of the minutes calculation times 60. For this example,

latitude seconds: 60 seconds times .65924 = **39.5544 seconds**

longitude seconds: 60 seconds times .2461 = **14.766 seconds**

If your result contains more than one decimal place, you should round to a single decimal place.

End Result: The coordinates in degrees/minutes/seconds for this example are

latitude:	**38º 19' 39.6"**	[38 degrees 19 minutes 39.6 seconds north latitude]
longitude	**-98º 53' 14.8"**	[98 degrees 53 minutes 14.8 seconds west longitude]

APPENDIX G

STATE RMP CONTACTS

Alaska (currently, is not be seeking delegation)
John Stone
Alaska Department of Environmental
Conservation, Air Division
410 Willoghby Avenue, Suite 105
Juneau, AK 99801-1795
phone 907-465-5103
jstone@envircon.state.ak.us

Arizona (will not be seeking delegation)
Daniel Roe, Executive Director
AZ State Emergency Response Commission
(AZSERC)
5636 East McDowell Road
Phoenix, AZ 85008
phone 602-231-6345
fax 602-392-7519
roed@dem.state.az.us

California (will be seeking delegation)
Steve DeMello
CA Office of Emergency Services
P.O. Box 419047
Rancho Cordova, CA 95741-9047
phone 916-464-3281
fax 916-464-3205
Steven_DeMello@oes.ca.gov

Connecticut
Greg Fitzpatrick
Department of Environmental Protection
Bureau of Air Management
79 Elm St.
Hartford, CT 06106
phone 860-424-3962
fax 860-424-4063

Delaware (will be seeking delegation)
Robert Barrish/ Richard Antoff/ Jay Brabson
DE Department of Natural Resources
and Environmental Control
Division of Air and Waste Management
715 Grantham Lane
New Castle, DE 19720
phone 302-323-4542
fax 302-323-4561/4598
bbarrish@state.de.us, rantoff@state.de.us
jbrabson@state.de.us

District of Columbia (will be seeking delegation)
Stan Tracey, Abraham Hagos
Air Quality Division
Environmental Health Administration
2100 Martin Luther King, Ave, S.E., Suite 203
Washington, DC 20020
phone 202-645-6093
fax 202-645-6102
stracey@mail.environ.state.dc.us
ahagos@mail.environ.state.dc.us

Florida (will seek delegation for all sources, except those with propane as their only regulated substance and covered process)
Dept. of Community Affairs
FL Division of Emergency Management
2555 Shumard Oak Boulevard
Tallahassee, Fla. 32399
phone 850-413-9970
fax 850-488-1739

Georgia
Kent Howell
Georgia Dept. of Natural Resources
Environmental Protection Division
7 M.L. King Jr. Drive, Suite 139
Atlanta, Ga. 30334
phone 404-656-6905
fax 404-657-7893
kent_howell@mail.dnr.state.ga.us

Hawaii (will be doing partial implementation and will seek delegation in 2000)
Marsha Graf
Hawaii State Department of Health
919 Ala Moana Blvd., Rm 206
Honolulu, Hawaii 96814-4912
phone 808-586-4694
fax 808-586-7537
mgraf@eha.health.state.hi.us@IN

Kentucky - Jefferson County
Art Williams
Air Pollution Control District of Jefferson County
850 Barrett Avenue, Suite 200
Louisville, KY 40204
502 574-6000 phone
502 574-5306 fax
awilliam@iglou.com

Mississippi (is seeking delegation)
Danny Jackson
Mississippi Dept. of Environmental Quality
Office of Pollution Control, Air Division
P.O. Box 10385
Jackson, Ms. 39289-0385
phone 601-961-5225
fax 601-961-5725
Jackson_Danny@deq.state.ms.us

Nevada (will be seeking delegation)
Mark Zusy, P.E.
Nevada Department of Conservation and Natural Resources
Division of Environmental Protection
333 W. Nye Lane, Room 138
Carson City, NV 89706-0851
phone 702-687-4670 x3012
fax 702-687-6396
mzusy@ndep.carson-city.nv.us

New Jersey
Reginald Baldini
NJ Bureau of Chemical Release Information and Prevention
22 South Clinton Avenue
P.O. Box 424
Trenton, N.J. 08625-0424
phone 609-633-7289
fax 609-633-7031
sschiffman@dep.state.nj.us

North Carolina (will be seeking delegation)
Mike Chapman
NC Dept of Environment
P.O. Box 29580
Raleigh, N.C. 27626-0580
phone 919-715-3467
fax 919-733-1812
michael_chapman@ncair.net

North Carolina - Forsyth County
Carol Curran / Keith Tart
Forsyth County Environmental Affairs Dept.
537 North Spruce Street
Winston-Salem, N.C. 27101-1362
phone 336-727-8060
fax 336-727-2777
currancm@co.forsyth.nc.us.
tartkf@co.forsyth.nc.us

North Carolina - Asheville/ Western NC
Regional Air Pollution Control Agency
James L. Cody
49 Mt. Carmel Road
Asheville, North Carolina 28806
phone (704) 255-5655
fax (704) 255-5226

Oregon (currently, is not be seeking delegation)
John Kinney
Oregon Department of Environmental Quality
Air Quality Division
811 Sw Sixth Avenue
Portland, OR 97204
phone 503-229-6819
Kinney.John@deq.state.or.us

Pennsylvania - Allegheny County (will be seeking delegation)
Tom Puzniak
Allegheny County Health Department
Bureau of Air Pollution Control
301 39th Street
Pittsburgh, PA 15201
phone 412-578-8319 or 7960
fax 412-578-8144
TJPUZ1@Bellatlantic.net

Pennsylvania - Philadelphia
Thomas Huynh
Air Management Services
Spelman Building, 2nd Floor
321 University Avenue
Philadelphia, PA 19104
phone 215-685-7572
fax 215-685-7593
THOMAS.HUYNH@PHILA.GOV

Puerto Rico
Nelson Moreno, Program Manager
Puerto Rico Environmental Quality Board
Air Program
Ponce de Leon Avenue #431
Hatorey, Puerto Rico 00917
phone 787-767-8025

Rhode Island
Gina Friedman
Dept. of Environmental Management
Division of Air Resources
291 Promenade St.
Providence, RI 02908
phone 401-222-2808 Ext. 7016
fax 401-222-2017

South Carolina
Rhonda B. Thompson
Bureau of Air Quality Control
SC Dept of Health and Environmental Health
2600 Bull Street
Columbia, S.C. 29201-1708
phone 803-898-4391
fax 803-898-4117
thompsrb@columb31.dhec.state.sc.us

Virgin Islands
Leonard Reed
Virgin Islands Department of Planning and Natural Resources
Bldg. 1118, Water Gut Homes
Christiansted, St. Croix
U.S. Virgin Islands 00820
phone 340-774-3320

Washington (currently, is not be seeking delegation)
Peter Lyons
Washington Deptartment of Ecology
Air Quality Program
PO Box 47600
Olympia, WA 98504-7600
phone 360-407-7530
fax 360-407-6802

John Ridgway
Washington Department of Ecology
Community Right-to-Know Unit
PO Box 47659
Olympia, WA 98504-7659
phone 360-407-6713
fax 360-407-6715
jrid461@ecy.wa.gov

APPENDIX H

EPA REGIONAL RMP CONTACTS

REGION 1
Office of Environmental Stewardship (SPP)
JFK Federal Building
One Congress St.
Boston, MA. 02203-2211
(617) 565-9232
(617) 565-4939 FAX
Email: dinardo.ray@epa.gov

REGION 2
Emergency Response and Remedial Division (MS211)
2890 Woodbridge Avenue
Edison, NJ 08837-3679
(732) 321-6620
(732) 321-4425 FAX
Email: ulshoefer.john@epa.gov

REGION 3
CEPP and Site Assessment Section (3HS33)
1650 Arch Street
Philadelphia, PA 19103-2029
(215)-814-3033
(215)-814-3254 FAX
Email: shabazz.mikal@epamail.epa.gov

REGION 4
Air Pesticides and Toxics Management Division
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303
(404) 562-9121
(404) 562-9095 FAX
Email: patmon.michelle@epa.gov

REGION 5
Superfund Division (SC6J)
77 W. Jackson Blvd.
Chicago, IL 60604
(312) 886-4061
(312) 886-6064 FAX
Email: mayhugh.robert@epa.gov

REGION 6
Superfund Division (6SF-RP)
1445 Ross Avenue
Dallas, TX 75202-2733
(214) 665-2292
(214) 665-7447 FAX
Email: mason.stephen@epa.gov

REGION 7
Air, RCRA, and Toxics Division (ARTD/TSPP)
726 Minnesota Ave.
Kansas City, KS 66101
(913) 551-7876
(913) 551-7065 FAX
Email: smith.marka@epa.gov

REGION 8
Ecosystems Protection and Remediation (8EPR-ER)
One Denver Place
999-18th Street, Suite 500
Denver, CO 80202-2405
(303) 312-6760
(303) 312-6071 FAX
Email: benoy.barbara@epa.gov

REGION 9
Superfund Division (SFD-5)
75 Hawthorne Street
San Francisco, CA 94105
(415) 744-2320
(415) 744-1916 FAX

REGION 10
Emergency Response & Site Cleanup Unit (ECL-116)
Office of Environmental Cleanup
U.S. EPA Region 10
1200 Sixth Ave.
Seattle, WA 98101
206-553-0285

APPENDIX I

RMP*SUBMIT RELATED MATERIALS

Documents

In the following list, materials marked with an asterisk (*) can be downloaded directly from the Internet homepage of EPA's Chemical Emergency Preparedness and Prevention Office (CEPPO) at **http://www.epa.gov/swercepp/acc-pre.html**. Most are available in Adobe Portable Document Format (PDF) — accessible with the free downloadable Adobe Acrobat Reader software, as text files, or in Corel WordPerfect 6.1. You can download a free Adobe Acrobat Reader from www.adobe.com. Alternatively, one or more copies of documents developed by EPA may be ordered from EPA's National Center for Environmental Publications and Information (NCEPI):

US EPA/NCEPI
PO Box 42419
Cincinnati, OH 45242-2419
Phone: (800) 490-9198
Fax: (513) 489-8695
www.epa.gov/epahome/publications

General Guidance for Risk Management Programs* (EPA 550-B98-003)
This document provides guidance to help facility owners and operators determine if their processes are subject to regulation under section 112(r) of the Clean Air Act and 40 CFR part 68 and to help them comply with the regulations. An appendix to this document provides the latest, final regulatory text.

RMP Offsite Consequence Analysis (OCA) Guidance* (EPA 550-B96-014)
The OCA Guidance provides simple methods and reference tables for use in preparing both worst-case and alternate release scenarios. This document will be updated in early 1999.

CAA Section 112(r) Frequently Asked Questions.*
This document is a list of commonly asked questions with answers provided by EPA. Categories of questions include the General Duty Clause, applicability, program level screening, hazard assessment, prevention program, emergency response program, enforcement, and implementation.

Industry-Specific Risk Management Programs and Plans

Generic guidance has been developed to help owners and operators of facilities in various industries comply with the RMP regulation. Each guidance includes sections on hazard assessment and emergency response, along with appendices relating to industry-specific issues. The following model plans have been developed by EPA and are available free of charge:

- **Risk Management Program and Plan for Ammonia Refrigeration Facilities.*** This guidance is intended for facilities with ammonia refrigeration systems (e.g., food processors and distributors, refrigerated warehouses). The guidance covers only

anhydrous ammonia and provides offsite consequence analyses that are specific to the ways in which ammonia is handled in an ammonia refrigeration system. Because virtually all covered ammonia refrigeration systems will be subject to either Program 1 or Program 3, this document provides no guidance on the Program 2 prevention program. The EPA publication number is 550-B98-014. It is available on the Internet at: **http://www.epa.gov/swercepp/acc-pre.html#Ammonia**

- **RMP Guidance for Propane Storage Facilities.*** This document (developed under an EPA grant by the State of Delaware) is intended as comprehensive RMP guidance for large propane storage or distribution facilities who already comply with propane industry standards. This guidance assumes that propane is the ONLY regulated substance stored at the facility. The EPA publication number is 550-B98-011. It is available on the Internet at: **http://www.epa.gov/swercepp/acc-pre.html#Long Propane**

- **RMP Guidance for Propane Users and Small Retailers.*** This document is intended as condensed guidance for smaller businesses who store or use propane and who already comply with propane industry standards. The guidance and sample RMPs assume that propane is the ONLY regulated substance stored at the facility. It is intended as a "bare-bones" guidance for small businesses - it includes sample RMPs for program 1 and 2 facilities. The EPA publication number is 550-B98-022. It is available on the Internet at: **http://www.epa.gov/swercepp/acc-pre.html#Short Propane**

- **Risk Management Program Guidance for Wastewater Treatment Plants.*** This guidance document (developed with input from the Association of Metropolitan Sewerage Agencies (AMSA)) is intended for wastewater treatment plants (public and private) that use chlorine, sulfur dioxide, ammonia, methane, and propane. It includes guidance specific to these substances as used and produced at wastewater treatment plants. The guidance provides chemical-specific offsite consequence analyses as well as industry-specific information on prevention programs. The EPA publication number is 550-B98-010. It is available on the Internet at: **http://www.epa.gov/swercepp/acc-pre.html#POTW Guidance**

- **Risk Management Program Guidance for Warehouses*** (January 1999) This guidance document (developed with input from the International Warehouse Logistics Association (IWLA)) contains comprehensive RMP implementation guidance for chemical warehouse owner/operators. The guidance includes simplified methods for conducting offsite consequence analyses on regulated substances commonly handled and stored at warehouses, as well as industry-specific information on accident prevention programs. The EPA publication number is 550-B90-004. It is available on the Internet at: **http://www.epa.gov/swercepp/acc-pre.html#Warehouses**

- **Risk Management Program Guidance for Chemical Distributors*** (January 1999) This guidance document (developed with input from the National Association of Chemical Distributors (NACD)) contains comprehensive RMP implementation guidance for owners and operators of chemical distribution facilities. The guidance includes simplified methods for conducting offsite consequence analyses on regulated substances commonly handled and stored at chemical distribution facilities, as well as industry-specific information on accident prevention programs. The EPA publication number is 550-B99-005. It is available on the Internet at: **http://www.epa.gov/swercepp/acc-pre.html#Distributors**

The following model plans have been developed by other groups and may include a fee:

- **Generic Risk Management Plan for Chlorine Packaging Plants and Sodium Hypochlorite Production Facilities** (Chlorine Institute Pamphlet 162) This document can be ordered for a fee from the Publications Coordinator, The Chlorine Institute, Inc., 2001 L Street, NW, Washington, D.C. 20036, phone 202-775-2790, fax 202-223-7225.

- **Model Risk Management Plan Guidance for Petroleum Refineries--Guidance for Complying with EPA's RMP Rule (40 Code of Federal Regulations 68), First Edition, August 1997** (API Publication 760) This document can be ordered from the American Petroleum Institute, Order Desk, 1220 L Street, NW, Washington, DC 20005.

  Model Risk Management Plan Guidance for Exploration and Production Facilities--Guidance for Complying with EPA's RMP Rule (40 Code of Federal Regulations 68), First Edition, August 1997 (API Publication 761) This document can be ordered from the American Petroleum Institute, Order Desk, 1220 L Street, NW, Washington, DC 20005.

- **Compliance Guideline for EPA's Risk Management Program Rule.** This document can be ordered from the Chemical Manufacturers Association Publications Fulfillment, PO Box 522, Annapolis Junction, MD 20701-0552, phone 301-617-7822.

- **Compliance Guidance and Model Risk Management Program for Water Treatment Plants** (AWWARF order number 90760) This document can be ordered from the American Water Works Association Research Foundation, 6666 W. Quincy Ave., Denver, CO 80235, phone 303-347-6121.

Electronic Resources

CEPPO Homepage

The CEPPO homepage at **www.epa.gov/ceppo/** provides access to many of the documents listed above and includes links to information on accident prevention and risk management planning, EPCRA, CRTK, databases and software, and much more.

RMP*Submit™ Program and Instructions

Software for the RMP*Submit program, installation and operation instructions, and the latest updates can be downloaded from the RMP*Submit homepage at: **http://www.epa.gov/swercepp/rmp-dev.html.** RMP*Submit can be ordered from NCEPI in either CD-ROM (EPA publication #: 550-C99-001) or diskettes (EPA publication #: 550-C99-002). Both CD-ROM and diskettes come with the RMP*Submit User Manual (EPA publication #: 550-B99-001). The CD-ROM version also has RMP*Comp.

RMP*Comp™

RMP*Comp is an electronic tool developed by the U.S. National Oceanic and Atmospheric Administration (NOAA) to simplify performing the offsite consequence analysis required under the RMP rule. The program guides you through the process of making an analysis and eliminates the need to make any calculations by hand. Software and installation and operation instructions can be downloaded from the NOAA website at: **http://response.restoration.noaa.gov/chemaids/rmp/rmp.html**

LandView™ III

LandView III is a desktop mapping system. It includes data compiled by EPA, the Bureau of the Census, and other federal agencies. Data is presented in a geographic context on maps displaying jurisdictional boundaries; networks of roads, rivers, and railroads; census block group and tract polygons; and other landmarks. Hardware and software requirements, prices, and ordering information are available from the Bureau of the Census website at **www.census.gov/geo/www/tiger/lv3desc.html**

Computer-Aided Management of Emergency Operations (CAMEO®) and Areal Location of Hazardous Atmospheres (ALOHA®)

CAMEO was developed jointly by EPA and the National Oceanic and Atmospheric Administration (NOAA) to help emergency planners and responders in government and industry plan for and mitigate chemical accidents. The CAMEO software suite supports chemical emergency management with chemical safety and emergency response data, digitized mapping, and air dispersion modeling; ALOHA is the air dispersion modeling component within CAMEO. A demo version of the software is available from the National Safety Council website at **www.nsc.org/ehc/cameo.htm**, where you can also find out about system requirements, how to order CAMEO, and when CAMEO workshops and training are being held, as well as join the CAMEO User's Forum.

APPENDIX J

3 DIGIT NAICS CODES

NAICS Code	Business Activity
111	Crop Production
112	Animal Production
113	Forestry and Logging
114	Fishing, Hunting and Trapping
115	Support Activities for Agriculture and Forestry
211	Oil and Gas Extraction
212	Mining (except Oil and Gas)
213	Support Activities for Mining
221	Utilities
233	Building, Developing and General Contracting
234	Heavy Construction
235	Special Trade Contractors
311	Food Manufacturing
312	Beverage and Tobacco Product Manufacturing
313	Textile Mills
314	Textile Product Mills
315	Apparel Manufacturing
316	Leather and Allied Product Manufacturing
321	Wood Product Manufacturing
322	Paper Manufacturing
323	Printing and Related Support Activities
325	Chemical Manufacturing
326	Plastics and Rubber Products Manufacturing
327	Nonmetallic Mineral Product Manufacturing
331	Primary Metal Manufacturing
332	Fabricated Metal Product Manufacturing
333	Machinery Manufacturing
334	Computer and Electronic Product Manufacturing
335	Electrical Equipment, Appliance and Component Manufacturing
336	Transportation Equipment Manufacturing
337	Furniture and Related Product Manufacturing
339	Miscellaneous Manufacturing
421	Wholesale Trade, Durable Goods
422	Wholesale Trade, Nondurable Goods
441	Motor Vehicle and Parts Dealers
443	Electronics and Appliance Stores
444	Building Material and Garden Equipment and Supplies Dealers
445	Food and Beverage Stores
446	Health and Personal Care Stores

447 Gasoline Stations
452 General Merchandise Stores
453 Miscellaneous Store Retailers
454 Nonstore Retailers

481 Air Transportation
482 Rail Transportation
483 Water Transportation
484 Truck Transportation
485 Transit and Ground Passenger Transportation
486 Pipeline Transportation
487 Scenic and Sightseeing Transportation
488 Support Activities for Transportation
491 Postal Service
493 Warehousing and Storage Facilities

511 Publishing Industries
512 Motion Picture and Sound Recording Industries
513 Broadcasting and Telecommunications
532 Rental and Leasing Services
541 Professional, Scientific and Technical Services
561 Administrative and Support Services
562 Waste Management and Remediation Services

611 Educational Services
621 Ambulatory Health Care Services
622 Hospitals

712 Museums, Historical Sites and Similar Institutions
713 Amusement, Gambling and Recreation Industries
721 Accommodation
722 Foodservices and Drinking Places

811 Repair and Maintenance
812 Personal and Laundry Services

922 Justice, Public Order, and Safety
924 Administration of Environmental Quality Programs
927 Space Research and Technology
928 National Security and International Affairs
999 Unclassified Establishments