U.S. EPA
REGION VIII PREPAREDNESS
PARatus
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RMP/EPCRA Review

What is RMP?

Risk Management Plan (RMP) facilities are a vital part of our national infrastructure. The RMP regulation is designed to prevent accidental releases to the air of substances that may cause immediate, serious harm to public health and the environment and to mitigate the effects of releases that do occur. The regulation applies to facilities that have more than a threshold of any of 77 acutely toxic substances and 63 highly volatile flammable substances that will present off-site consequences in a release or accident scenario. The regulation requires facilities subject to the regulation to develop and implement risk management programs that incorporate three elements:

1) Hazard assessment;
2) A prevention program;
3) An emergency response program.

Under the Clean Air Act, the EPA requires Risk Management Plans from these facilities. These plans explain how each company plans to prevent chemical accidents at its facility, minimize the consequences of any accidents which do occur, protect personnel within the facility, and protect people and the environment "beyond the facility fence line."

The regulations not only apply to petrochemical plants but also to stores selling propane, cold storage facilities, municipal drinking water and wastewater treatment plants, chemical warehouses, and other businesses which store large quantities of specified chemicals.

The RMP regulation is intended to protect the community from catastrophic accidents at facilities handling hazardous materials. That goal is achieved in part by reducing the likelihood or the severity of accidental chemical releases.

CHEMICAL HAZARD INFORMATION:

Federal Reading Rooms provide members of the public with "read-only" access to paper copies of Risk Management Plans (RMPs), including Off-Site Consequences Analysis (OCA) information submitted by chemical facilities, pursuant to the Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (Pub. L. No. 106-40). Although all Federal Reading Rooms provide the same information, some reading rooms are operated by the Department of Justice (DOJ) and others are the responsibility of the Environmental Protection Agency (EPA). Check the Environmental Protection Agency's (EPA) Federal Reading Rooms website for the location nearest you.

All DOJ Reading Rooms are operated on an "appointment-only" basis. Contact the Department's toll-free appointment line, 1-888-442-9267, **at least 7 days prior** to the date you wish to review RMPs. You will be asked to provide your full name; a daytime telephone number; the reading room location you wish to visit; and the names of the facilities whose RMPs you wish to view. In addition, you must provide a home or work address in order to receive access to those RMPs that could be provided by your Local Emergency Planning Committee.

A Reading Room Representative will contact you by telephone prior to the requested appointment date. This Representative will confirm the date and time of the (cont. pg 2)

Partner Corner

Want more localized info? Check out these sites:

- Montana
- Wyoming
- North Dakota
- South Dakota
- Utah
- Colorado
- Denver

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reading room visit and will provide the address of the reading room site. Please immediately notify the Reading Room Appointment Center if you are unable to visit the reading room at the scheduled time.

For additional information, please see EPA's Risk Management Plan.

EPCRA

The Emergency Planning and Community Right-to-Know Act (EPCRA) says that the local community has a right to know what hazardous chemicals are stored in their communities. It established State Emergency Response Commissions (SERC), Tribal Emergency Response Commissions (TERC), and Local Emergency Response Committees (LEPC) to ensure facilities that store hazardous materials report what kind and how much on a yearly basis. EPCRA requires these facilities to submit Tier II reports; which include general facility information, the facility location, which chemicals they have over a certain threshold, how much they store, etc. This information is to be used by the community, and emergency responders to know the hazards associated with the chemicals. The LEPC receives these yearly reports, reviews them, and creates emergency plans for the community accordingly. The community can request to view Tier II reports from their local LEPCs information concerning the chemical hazards in their community.

Regional RMP

On a more local note, an analysis of RMP facilities has been conducted in EPA Region VIII. The analysis has several categories—among which are included toxic and flammable chemicals. The following charts give us a quick look at how we are Region-wide concerning these chemicals:

Region 8 Top 10 Toxic Chemicals (tons)

*Numbers represent multiple processes

Chemical (Toxic)	Total
Ammonia (anhydrous)	705,225
Chlorine	4,031
Sulfur dioxide (anhydrous)	1,587
Ammonia (conc 20% or greater)	1,340
Titanium tetrachloride [Titanium chloride (TiCl4) (T-4)-]	1,153
Formaldehyde (solution)	880
Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]	714
Hydrochloric acid (conc 37% or greater)	270
Hydrogen sulfide	102
Toluene diisocyanate (unspecified isomer) [Benzene, 1,3-diisocyanatomethyl-]	94

(Flammable Chemical Chart on Page 3)

RMP/EPCRA Review (cont.)

Region 8 Top 10 Flammable Chemicals (tons)

*Numbers represent multiple processes

Chemical (Flammable)	Total
Flammable Mixture	322,085
Butane	49,607
Propane	42,729
Pentane	6,117
Isobutane [Propane, 2-methyl]	3,946
1-Butene	507
Methane	355
Isopentane [Butane, 2-methyl-]	328
Ethane	208
1,3-Butadiene	193

To find out about chemicals in your state click on the following link: Top Region8 chemicals by state
Colorado, South Dakota, North Dakota, Montana, Wyoming, Utah.

Wyoming School Mercury Spill

Mercury containers to be disposed

Mercury Spill Evacuates Wyoming School

After finding out the mercury vapor concentration at the entrance of Big Piney High School, the business manager for Sublette School District #9 (District 9) evacuated some 180 students and staff on Thursday, February 28, 2013. The day before approximately one cup (7 lbs.) of elemental (metallic) mercury was spilled in a storage closet. The spill was not reported immediately and mercury was tracked to other parts of the school including a pep rally.

At a distance of about 1,000 feet from the spill location and with 4 sets of sealed doors in between, EPA On-Scene Coordinator (OSC) Shun-Ping Chau (Ping) and a contractor obtained a mercury vapor reading in excess of 1,000 nanograms per cubic meter (parts per billion or ppb) immediately inside the school's main entrance and at breathing level. Prior to EPA's arrival at the scene, the Wyoming Region 4 Response Team (Wyoming Team) from Rock Springs, Wyoming initiated cleanup of spill.

Ping said the decision to evacuate was a precautionary measure due to the presence of sensitive populations -young children at an on-site daycare and pregnant women. Once the school was evacuated, Ping and two contractors entered into the spill area and measured air concentrations of mercury ranging from 100,000 to over 1,000,000 ppb.

While mercury is a liquid at normal room temperature, it easily becomes a vapor as the temperature rises and becomes concentrated in enclosed spaces. Elemental mercury in vapor form is both colorless and odorless, while being extremely toxic and easily inhaled. (Cont. Page 4)

Wyoming School Mercury Spill (Cont.)

Venting of hallway.

Classes were also cancelled for Friday. Extensive cleanup efforts by EPA over the weekend led to the school's partial reopening on Monday, although 25% of the school remained sealed off with plastic sheeting while further decontamination efforts continued.

Mitigation efforts included removal and cleaning or disposal of the contents of the storage closet, removal of ceiling and floor tiles, and vacuuming and washing surface areas with mercury soap. Two coats of sealant paint were applied to the walls and two coats of epoxy to the floor of the storage closet. The classroom floor next to the storage closet was washed with mercury soap, had the floor wax scrubbed off, vacuumed, washed again, and had two coats of wax applied.

Desks and stools were taken to a heated area to drive off the mercury vapor and then washed. The building was vented strategically by section to allow airflow from the areas with lower mercury levels to higher levels and eventually to the outside.

Attempts were made to decontaminate various high-value items such as a telescope, microscopes, a human skeleton, a plastic human anatomy model, laptop computers and other electronics. After multiple cleanings and ventings, the telescope and microscopes still had high readings, ranging from 20,000 to 30,000 ppb, and were disposed of. The remaining items were successfully decontaminated by vacuuming, cleaning, heating and venting.

Before the school's partial reopening on Monday, the EPA OSC, with the supervision of the District 9 business manager, removed all belongings in the lockers along the hallway near the spill area. All food items, water bottles, cups, vuvuzelas (plastic horn noise makers), makeup and personal care items were disposed of as a precautionary measure. Other materials were bagged and screened. The highest reading on these bagged items was 292 nanograms per cubic meter and, therefore, were deemed safe to be returned to the students. District 9 took possession of these items and made arrangements for students to claim their belongings.

During EPA's cleanup actions, it was discovered that members of the Wyoming Team had been exposed to the mercury contamination. Unfortunately, the Wyoming Team did not have equipment to appropriately measure mercury vapor concentrations which resulted in their use of inappropriate respiratory protection while working in the spill area.

EPA *non-residential clearance levels* are set at 3,000 ppb or below. Due to the sensitive populations at the school and after consultation with an ATSDR physician, Ping hoped to achieve the lower *residential occupancy clearance levels* of 1,000 ppb and, as of Wednesday at 7 a.m., all readings were below 150 ppb, and the school was completely cleared. In conjunction with the cleanup, OSC Ping led an effort in community outreach to persuade local residents to turn in mercury stored in their homes and, as a result, the quantity of mercury sent for disposal grew to nearly three times the original amount reported.

Training & Exercises

Region 8 creates an annual Training and Exercise Plan (TEP) to address our current priorities and methodologies in training and exercise (T&E) activities. A schedule listing our regional trainings and exercises is developed for each year showing the type of T&E, location, time, sponsor, participants and regional priorities being addressed (see attached T&E Schedule).

We are always open to assist and participate in exercises that relate to or have a component of our ESF 10 responsibilities including: chemical, biological, radiological, nuclear or explosive (CBRNE) events, as well as other hazardous materials incidents.

Please contact Luke Chavez (chavez.luke@epa.gov, 320-312-6512) - Exercise Coordinator if you have any questions regarding EPA Region 8 T&E or have an exercise that we may assist you in. Planning and Exercise Schedule

Environmental Training at Southern Ute Indian Tribe and Ute Mountain Ute Tribe

Enthralled Students

The EPA Region 8 Emergency Preparedness Unit in coordination with the Environmental Programs at Southern Ute Indian Tribe and Ute Mountain Ute Tribe provided Hydrogen Sulfide (H_2S) Awareness Training in April 2013. Thirty participants attended the ½ day session at the Southern Ute Environmental Office and 90 attended at least one of two ½ day sessions at the Ute Mountain Ute Casino Conference Center. Attendees represented a variety of disciplines including fire, law, rescue, public works, rangers, parks, energy, natural resources, health, environmental programs, GIS, Tribal oil and gas enterprises, private sector oil and gas companies, BIA, and the Tribal Historic Preservation Office.

EPA Preparedness Unit Chief Kathleen Atencio conducting a one-on-one

EPA presenters provided technical information on the chemical characteristics, health effects, hazards and general response procedures for H_2S exposures. EPA also discussed its resources for assisting with responses to emergencies, conducting training courses and exercises, and demonstrated a plume modeling program for chemical releases. Tribal programs and responders displayed maps showing potential H_2S risk locations (Fruitland coal methane outcropping and coal fires on Southern Ute Indian Reservation and the Barker Dome gas production area on the Ute Mountain Ute Reservation) and discussed response procedures including several case studies. BIA Fire summarized its updated protocol on responding to wildland fires that also addresses H_2S issues. The private oil and gas companies and Tribal enterprises spoke about safety procedures, responses and maintenance practices. There was discussion and demonstration of various monitoring equipment, its best use, effectiveness, maintenance requirements and costs.

40 Hour HAZWOPER Course – Billings, Montana

The United States Environmental Protection Agency (EPA), Environmental Response Team sponsored a 40-hour HAZWOPER training course for EPA Region 8 specifically to support the needs of some of the Northern Indian tribes. The course was presented by ERT's contractor HazTrain, Inc. and held in Billings, Montana. Native Americans from various tribes from Arizona, Idaho, North and South Dakota and Montana participated in the training, representing a variety of disciplines from environmental specialists to hazardous waste engineers. Individuals from the Chippewa-Cree, Northern Cheyenne, Crow, Navajo, 3 Affiliated Tribes and Fort Berthold Indian Reservation were represented. The Bureau of Indian Affairs, Bureau of Land Management and US Fish and Wildlife were also supported in this training.

This is the fifth course, recently, that ERT has assisted tribal governments and coalitions through support of training for Native American environmental personnel. In addition to this course, one was presented for Inter-Tribal Environmental Professionals coalition in April 2013 in Memphis, Tennessee. In April 2012, a course was also presented for ITEP in Tempe, Arizona and an EPA 40-Hour HAZWOPER course was presented to the Native American Environmental Protection Coalition (NAEPC) in January, 2012 in Alpine, California at the Viejas Band of Kumeyaay Indians. Before that, ERT sponsored a 40-hour HAZWOPER training course for the ITEP in Tempe, Arizona in October of 2011.

All of these courses have been so well received and such strong praise has come for both the curriculum and the instructors, which both sponsoring organizations have inquired about hosting future courses. In fact, NAEPC has already inquired about scheduling a course somewhere in Southern California in the Summer of 2013 and ITEP has expressed interest about hosting another 40 Hour course in Denver sometime in 2014. These courses demonstrate the strong relationship being built between the Native American Nations and the Environmental Protection Agency.
A special thanks to Mark Wullstein our Region VIII EPA training guru, and the Billings, MT Fire Department for their great support!

RMP News

Ethanol producer to pay $136,500 for risk management and chemical reporting violations at Aberdeen and Huron, S.D. facilities

The U.S. Environmental Protection Agency (EPA) announced that Advanced BioEnergy, LLC, based in Bloomington, Minn., has agreed to pay penalties totaling $136,500 to settle claims related to violations at its Huron and Aberdeen, S.D. ethanol production facilities. The violations are related to the facilities' risk management programs and the failure to properly file Toxic Release Inventory (TRI) forms detailing the use and management of chemicals.

"Risk management plans help prevent and reduce the impacts of potentially catastrophic accidents involving flammable and toxic chemicals," said Mike Gaydosh, EPA enforcement director in Denver. "These plans, along with timely reporting about the use of chemicals, are vital to keeping workers and communities safe. Advanced BioEnergy has been responsive in correcting the violations and coming into compliance, and we will continue to ensure they do so."

EPA inspections conducted in January, 2012 found Advanced BioEnergy's ethanol plants had deficiencies in their Risk Management Plans associated with the use and storage of hazardous (Cont. Page7)

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chemicals. Under the Clean Air Act, facilities like the Huron and Aberdeen ethanol plants are required to have viable plans in place to reduce the risks associated with toxic and/or flammable chemicals. These plans help companies, industries and municipalities operate responsibly and assist emergency responders by providing vital information necessary to address accidents and other incidents. By agreeing to the settlements, the company has agreed to come into compliance with federal risk management program regulations within 180 days.

Advanced BioEnergy also failed to accurately file TRI forms detailing the chemicals processed, manufactured or used at its facilities. These forms are required under the federal Emergency Planning and Community Right to Know Act. EPA's actions are expected to encourage better compliance with TRI reporting requirements and to ensure that residents and responders have complete information about chemicals present in their neighborhoods. This information also supports health studies based on the TRI database and helps federal, state, and local authorities plan for cleaning up industrial pollution spills.

Reddy Ice Corporation to pay penalty and improve accident prevention and preparedness at Denver facility

The U.S. Environmental Protection Agency (EPA) announced a Clean Air Act settlement in which the Reddy Ice Corporation (Reddy Ice), based in Dallas, Texas, has agreed to pay a $61,500 penalty and correct deficiencies associated with the risk management program at its facility in Denver, Colo.

According to the settlement, Reddy Ice allegedly violated the risk management plan provisions of the Clean Air Act by failing to ensure storage vessels containing hazardous chemicals were constructed according to industry standards and providing insufficient documentation in plans designed to mitigate on-site hazards. These deficiencies were discovered during an EPA inspection of the ice manufacturer's facility in north Denver on December 5, 2010.

"Facilities that use chemicals and substances that pose a potential danger are responsible for having a robust risk management program in place," said Mike Gaydosh, director of EPA's enforcement program in Denver. "Failure to do so places the environment, employees, and nearby communities at risk."

The Reddy Ice facility is subject to the risk management provisions of the Clean Air Act due to its on-site quantity of anhydrous ammonia, an acutely toxic chemical. As a result of the agreement, the company will take steps to ensure that process vessels containing ammonia are properly constructed and will update the facility's risk management plan. Ready Ice has agreed to correct the deficiencies within 60 days. Under the Clean Air Act, operations such as the Reddy Ice facility must develop and implement a risk management plan to assist with emergency preparedness, chemical release prevention, and minimization of releases that occur. EPA Inspectors found that the facility had not adequately implemented these regulations.

EPA's action will benefit residents, including significant low-income and minority populations, in the vicinity of the Reddy Ice facility by reducing the possibility of exposure to anhydrous ammonia. This settlement will also ensure proper safety practices are in place to protect employees and first responders from the threat of dangerous chemical releases.

For more information on the Clean Air Act and risk management requirements: http://www.epa.gov/emergencies/content/rmp/

Preparedness Unit Mission Statement:

We will increase EPA Region 8 preparedness through:

- Planning, Training, Exercising, and developing outreach relations with federal agencies, states, tribes, local organizations and the regulated community.
- Assisting in the development of EPA Region 8 preparedness planning and response capabilities through the RSC, IMT, RRT, OPA, RMP, etc.
- Working with facilities to reduce accidents and spills through education, inspections and enforcement. To view our programs, or contact a member of our team:

(Click here for Org Chart)

Acronym List

IMT	Incident Management Team
OPA	Oil Pollution Act
RRT	Regional Response Team
RSC	Response Support Corps
SPCC	Spill Prevention, Control, and Countermeasures

1 (800) 424-8802

National Response Center

www.nrc.uscg.mil

Need More info on the Risk Management Program (RMP)?

RMP Reporting Center

The Reporting Center can answer questions about software or installation problems. The RMP Reporting Center is available from 8:00 a.m. to 4:30 p.m., Monday through Friday, for questions on the Risk Management Plan program: (703) 227-7650 (phone) RMPRC@epacdx.net (e-mail)

Chemical Emergency Preparedness & Prevention Office (CEPPO) http://www.epa.gov/oem

Compliance and Enforcement: http://www2.epa.gov/enforcement

Compliance Assistance: http://www.epa.gov/oecaerth/assistance/index.html

Call our hotline, the Superfund, TRI, EPCRA, RMP, and Oil Information Center (800) 424-9346 or (703) 412-9810 TDD (800) 553-7672 or (703) 412-3323 Mon-Thurs 10:00 am to 3:00 pm ET (except Federal Holidays) or see

www.epa.gov/superfund/contacts/infocenter/

You can also call or write to:

U.S. EPA Region 8
1595 Wynkoop Street (8EPR-ER)
Denver, CO 80202-1129
800-227-8917

CO, MT, ND, SD, UT, and WY

To report an oil or chemical spill, call the National Response Center at (800) 424-8802.

This newsletter provides information on the EPA Risk Management Program, EPCRA, SPCC/FRP (Facility Response Plan) and other issues relating to Accidental Release Prevention Requirements. The information should be used as a reference tool, not as a definitive source of compliance information. Compliance regulations are published in 40 CFR Part 68 for CAA section 112(r) Risk Management Program, 40 CFR Part 355/370 for EPCRA, and 40 CFR Part 112.2 for SPCC/FRP.