



A CHECKLIST FOR SUBMITTING YOUR RISK MANAGEMENT PLAN (RMP) FOR CHEMICAL ACCIDENT PREVENTION

In 1996, EPA established a list of substances regulated for risk of accidental release and issued rules for the prevention and mitigation of accidental releases of those substances under section 112(r) of the Clean Air Act. Facilities covered by the regulations are required to implement a risk management program and submit a description of the program (called a risk management plan, or RMP) to EPA. RMPs must be updated at least once every five years, and many covered facilities must update their RMPs in 2014. This fact sheet provides important information about 2014 submissions and a checklist to consider in preparing and resubmitting a 5-year update. It is important that owners, operators, plant managers, and others responsible for RMP implementation review this information and take appropriate steps to update their RMPs.

WHAT IS THE 5-YEAR UPDATE REQUIREMENT?

If you are the owner or operator of an RMP facility, EPA's Chemical Accident Prevention regulations at 40 CFR part 68 require that you fully update and resubmit your RMP at least once every 5 years. If certain process changes described in 40 CFR §68.190 occur at your facility prior to the 5-year anniversary of your RMP, you must update and resubmit your RMP. The 5-year anniversary date is reset whenever you fully update and resubmit your RMP.

Your 5-year anniversary date is based on the date of your most recent, full submission. This date is provided in the response that EPA sent to you acknowledging receipt of your most current RMP. If you need help determining your 5-year anniversary date, you can call the RMP Reporting Center for assistance.

ARE THERE ANY CHANGES IN REPORTING?

In March 2009, EPA launched RMP*eSubmit, a Web-based system that allows facilities to securely submit and make corrections to their RMPs. The RMP*eSubmit software application is easy to use, improves data quality, and enables you to access your RMP 24 hours a day, 7 days a week. Information from previous RMPs has been imported into the RMP*eSubmit system to help facilities with their resubmissions. *The data requirements have not changed.*

EPA phased-out the "RMP*Submit" software in late 2009; the software is no longer supported.

To use RMP*eSubmit you must have the following:

- Internet access
- JavaScript enabled Internet browser
- Central Data Exchange (CDX) account

HOW DO I SET UP AN ACCOUNT?

Important Definitions:

Central Data Exchange (CDX) is a secure, online location on EPA's network. CDX provides standardized and secure information collection services and infrastructure for EPA program partners. For example, CDX manages several Agency regulatory and monitoring programs, receiving submissions from facilities. Once you set up your CDX account, you will immediately be able to access your RMP through CDX.

Certifiers/Certifying Officials are facility owners or operators who must certify the accuracy and completeness of the information reported in the RMP. They have signed and submitted a one-time Electronic Signature Agreement (ESA) to the EPA. The ESA legally binds the Certifier's electronic submission to their signature. Only Certifiers can submit the RMP.

Preparers have been granted permission by a facility to access the facility's existing RMP. They prepare data for a new or updated RMP. A Certifier may also be the Preparer of an RMP, or they may choose to delegate the responsibility to a specific individual. CDX notifies the Certifier when the new or corrected RMP is ready for the Certifier's review and submission. A delegated Preparer cannot submit the RMP.

Before you begin you will need:

- Your facility name, location, mailing address, and basic contact information (including email address).
- Your EPA Facility Identification Number (Facility ID #) can be found in the response EPA sent to you acknowledging receipt of your most recent RMP.
 - NOTE: If this is the first time an RMP is being submitted for your facility you do not need a Facility ID #.

Step 1: Register the Certifying Official in CDX

- ✓ To use RMP*eSubmit, the Certifying Official must have a CDX account.
- ✓ To register with CDX, go to <http://cdx.epa.gov>, and complete the registration process for a Risk Management Plan "Certifying Official." (See EPA's [RMP*eSubmit Users' Manual](http://www.epa.gov/emergencies/content/rmp/rmp_esubmit.htm) at http://www.epa.gov/emergencies/content/rmp/rmp_esubmit.htm for detailed instructions).

Step 2: Complete the Electronic Signature Agreement (ESA) and mail it to EPA

The electronic signature is used to verify that the Certifying Official reviewed and submitted the RMP in the RMP*eSubmit system.

- ✓ You will complete the ESA at the time you initially register in CDX, or, if you already had a CDX account, at the time you add RMP*eSubmit access to your CDX account profile.
- ✓ CDX will guide you through the process of completing and submitting your ESA. You will need your Facility ID #, unless this is the first time an RMP is being submitted for your facility. If this is a first-time submission, CDX will prompt you to type in the name and address of the facility in place of the Facility ID #. You will receive a Facility ID # via email after you have signed, printed all pages, and mailed your ESA to the RMP Reporting Center.

Print all pages of the ESA. Sign the completed ESA and mail all pages to EPA's RMP Reporting Center:

RMP Reporting Center
P.O. Box 10162
Fairfax, VA 22038

- ✓ The RMP Reporting Center will review and process the ESA, and send an email to the Certifying Official indicating that the electronic signature has been received and approved.
 - NOTE: The email will also include a unique Authorization Code. This Authorization Code will be used by an RMP Preparer that Certifying Official assigns to enter data in RMP*eSubmit for your facility.

Step 3: Register the Preparer and activate RMP*eSubmit access in CDX

- ✓ If the Certifying Official is also the Preparer, log in to CDX, add "Preparer" to your profile, and enter your Unique Authorization Code.
- ✓ If the Certifying Official designates someone else as the Preparer, please provide that designee with the Authorization Code for your facility. Preparers will be required to provide this information when registering and activating their RMP*eSubmit access in CDX.

WHAT ARE THE SUBMISSION AND RESUBMISSION REQUIREMENTS?

For your submission and/or resubmission, you are required to review all nine sections of your RMP, update as appropriate, and certify that the entire updated RMP is true, accurate, and complete. The following is a checklist of some key elements in your RMP that you should review for your resubmission.

Section 1: Registration Information

- ✓ **Review your registration information and make any necessary corrections to ensure that it is up-to-date.** Remember that your "facility location address" is the physical location where regulated substances are present. The "facility location address" cannot be a post office or rural box number. Also, remember that your "mailing address" is the address that EPA will use for sending all non-electronic correspondence.
- ✓ **Verify your latitude and longitude coordinates.** Latitude and longitude coordinates were reported incorrectly in many RMPs. The latitude and longitude of your facility can be determined in several different ways, including through the use of global positioning system (GPS) receivers, U.S. Geological Survey (USGS) topographic maps, and Web-based siting tools. The tool combines interactive maps and aerial photography to help users get latitude and longitude coordinates (in degrees, minutes, and seconds) of their sites. Several commercial Websites also have siting tools, such as Google Maps (<https://maps.google.com/>), Google Earth (<http://www.google.com/earth/>), Bing Maps (<http://www.bing.com/maps/>), and MapQuest (<http://www.mapquest.com/satellite-maps/>).
- ✓ **Check Your North American Industry Classification System (NAICS) code to make sure your covered process(es) are coded correctly.** The Census Bureau maintains a Website with the 2014 NAICS Codes (<https://www.census.gov/eos/www/naics/>) and a list of the correspondence between the NAICS 1997 and NAICS 2002 codes.

Sections 2 – 5: Worst Case and Alternate Release Scenarios

- ✓ **Review and update your offsite consequence analysis (OCA) at least once every 5 years.** Under the regulations, you are required to review and update your offsite consequence analysis (OCA) at least once every five years (40 CFR §68.36). You should review your documentation to determine whether the parameters and assumptions used in the

analysis are still valid and make changes, as appropriate. The results of your review should be documented and maintained as part of your RMP records. Any changes to the scenarios resulting from your review, including changes in the distance-to-endpoint(s), should be reported in your resubmission.

- ✓ **In your OCA, use current data to estimate population.** You may use your own GIS (Geographic Information System) software and obtain the latest Census data (such as through <https://www.census.gov/geo/>), or use the mapping application MARPLOT, from the CAMEO software suite (<http://www2.epa.gov/cameo>).

Section 6: Accident History

- ✓ **Update your 5-year accident history.** You must update your accident history to include any accidental releases that occurred over the past five years from a covered process and resulted in deaths, injuries, or significant property damage on site, or known off-site deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. You may remove from your accident history any accident that occurred more than 5 years ago.

Sections 7 and 8: Prevention Program

- ✓ **For Program 2 and Program 3 processes, report the most recent dates of your prevention program activities in your resubmission.**

Section 9: Emergency Response

- ✓ **Report the dates of your most recent review of your emergency response program and most recent training in your resubmission.**

SOME THINGS TO REMEMBER

The regulations require you to periodically implement or review several aspects of your prevention and emergency response programs. You should ensure that you are up-to-date with implementation of these requirements. You should reflect the most recent information for your prevention and emergency response programs in your RMP update. For example, you should report the date of your most recent hazard review/process hazard analysis update, and the completion date for any changes resulting from the hazard review/process hazard analysis update, in your resubmission. The following highlights some of these recurring requirements:

Prevention Program

- **For Program 2, review and update your hazard review at least once every 5 years.** If your process is designated as Program 2, you are required to review and update your hazard review at least once every five years (40 CFR §68.50). The review and any updates of the hazard review, as well as resolution of any problems identified, must be documented.
- **For Program 3, update and revalidate your process hazard analysis (PHA) at least once every 5 years.** If your process is designated as Program 3, you are required to update and revalidate your process hazard analysis (PHA) at least once every five years (40 CFR §68.67) to assure that your PHA is consistent with the current process. This update and revalidation must be conducted by a team.

To update and revalidate your PHA, you should evaluate your current process hazard analysis for accuracy and completeness. This evaluation should include checking that all modifications to your process are reflected in the PHA; evaluating the process safety information to ensure that it is complete, current, and accurate; verifying that operating procedures are adequate, up-to-date, and implemented; documenting and verifying that PHA recommendations have been resolved; and reviewing incident investigation reports. Updated and revalidated PHAs completed to comply with OSHA's Process Safety Management Standard (29 CFR §1910.119(e)) (for processing covered under both the RMP regulations and PSM standard) are acceptable to meet this requirement, provided that they also consider offsite consequences.

The revalidation and any updates of the process hazard analyses, as well as resolution of any recommendations, must be documented. This documentation must be retained as part of your RMP records for the life of the process.

- **For Program 2 and Program 3 processes, verify that you have carried out any recurring prevention program implementation requirements.** The regulations require several aspects of your prevention program to be periodically implemented or reviewed. These are some reminders about your prevention program activities:
 - Training in operating procedures (40 CFR §§68.54 and 68.71): For both Program 2 and 3 processes, you are required to provide refresher training in operating procedures at least every three years, and more often if necessary.
 - Compliance audits (40 CFR §§68.58 and 68.79): For both Program 2 and 3 processes, you are required to audit your procedures and practices for compliance with the regulations at least every three years to verify their adequacy and implementation.
 - Maintenance (40 CFR §68.56): For both Program 2 and 3 processes, you are required to inspect and test your process equipment according to the schedule that you have established based on good engineering practices.
 - Operating procedures (40 CFR §68.89): For Program 3 processes only, you are required to certify annually that your operating procedures are current and accurate.
 - Management of change (40 CFR §68.75): For Program 3 processes only, if you make changes to the process other than “replacements in kind”, you are required to update your process safety information and any procedures and affected by the change.

Emergency Response Program

You are required to periodically review and update, as appropriate, your emergency response program and to notify your employees of any changes to your emergency response plan (40 CFR §68.95). You should verify that your facility is currently included in the community emergency response plan and you should also review and update your procedures for notifying emergency responders in an emergency.

WHAT EPA RESOURCES ARE AVAILABLE ON THE WEB?

RMP Guidance

http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General

Industry-Specific RMP Guidance

<http://www.epa.gov/emergencies/guidance.htm>

Offsite Consequence Analysis (OCA) Guidance

http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#OCA

RMP*eSubmit

<http://www.epa.gov/emergencies/content/rmp/index.htm#preparing>

Frequently Asked Questions (FAQs) about RMP

<http://emergencymanagement.supportportal.com/ics/support/KBSplash.asp>

Chemical Accident Prevention Provisions 40 CFR Part 68

<http://www.epa.gov/emergencies/lawsregs.htm>

WHAT NON-EPA RESOURCES ARE AVAILABLE ON THE WEB?

2012 NAICS Codes (Census Bureau)

<https://www.census.gov/eos/www/naics/>

Process Safety Management Standard (OSHA)

<http://www.osha.gov/SLTC/processsafetymanagement>

Some Tools to Verify your Latitude and Longitude Coordinates

Google Maps: <https://maps.google.com/>

Google Earth: <http://www.google.com/earth/>

Bing Maps: <http://www.bing.com/maps/>

MapQuest: <http://www.mapquest.com/satellite-maps/>

WHERE DO YOU GO FOR HELP?

RMP Questions: Under Clean Air Act §112, states can choose to take delegation of the RMP program. If they do, they become the implementing agency for that state (<http://www.epa.gov/emergencies/docs/chem/W-Chap-10.pdf>). In delegated states, you may contact your state implementing agency for assistance. In all other states, your EPA regional office is the implementing agency for your state and you may contact them for assistance. We maintain current phone numbers for state and EPA regional contacts on our Website:

<http://www.epa.gov/epahome/whereyoulive.htm>.

You can also call the toll free Superfund, TRI, EPCRA, RMP & Oil Information Center (also known as the "Info Center"):

800-424-9346 Toll Free

703-412-9810 Metropolitan DC area and international calls

Monday – Friday: 10:00 AM – 5:00 PM Eastern Time / Closed on Federal Holidays

RMP*eSubmit Software Support: For software questions, contact the RMP Reporting Center:

703-227-7650 All domestic and international calls

Monday – Friday: 8:00 AM – 4:30 PM Eastern Time / Closed on Federal Holidays

RMPPRC@epacdx.net