Risk Management Plans, Updates, and RMP*eSubmit

Reporting requirements, when to update, and how to submit using the new web-based system

Risk Management Plan

- Record reflecting the status of facility's risk management program
- Includes portions for all the elements we talked about previously
- Also requires an executive summary

Executive Summary (*40 CFR 68.155*)

- ***Must*** briefly describe the following elements
  - Accidental release prevention and emergency response policies at your facility
  - Your facility and the regulated substances handled
  - General accidental release prevention program and chemical-specific prevention steps

Executive Summary (*40 CFR 68.155*)

- ***Must*** briefly describe the following elements
  - Five-year accident history
  - Emergency response program
  - Planned changes to improve safety ***(common deficiency)***
    - Be specific! A general statement on safety policies does not suffice.

Updating Plan

- Updates may correlate to program updates, however there are additional circumstances that require update, regardless of change in program (*40 CFR 68.190*)

Required Reviews, Updates, and Resubmittal of RMPs

- No later than three years after a newly regulated substance is first listed by EPA *(68.190(b)(2))*
- No later than the **date** on which a new regulated **substance is first present** in an already-covered or new process above a threshold quantity *(68.190(b)(3)-(4))*

Required Reviews, Updates, and Resubmittal of RMPs

- Within 6 months of a change that
  - Requires a revised PHA or hazard review *(68.190(b)(5))*
  - Requires a revised off-site consequences analysis as provided in 40 CFR 68.36 *(68.190(b)(6))*
  - Alters the program level that applied to any covered process *(68.190(b)(7))*

Required Reviews, Updates, and Resubmittal of RMPs

- At least every five years from the date of the initial submission or most recent resubmission
  - Resubmissions are full updates of the RMP, not just a correction

Required Reviews, Updates, and Resubmittal of RMPs

- If a facility becomes no longer subject to this regulation, submit a deregistration to EPA within 6 months indicating that the facility is no longer covered *(68.190(c))*

Required Reviews, Updates, and Resubmittal of RMPs

- Reasons for deregistration in Region 7
  - Terminated operations
  - No longer uses any regulated substance
  - Reduced inventory of all regulated substances below thresholds

Corrections to Plan

- Per 40 CFR 68.195
- Not big enough to warrant full update
- Does not alter the 5-year anniversary date

Required Corrections to the RMP

- New Accident History Information
  - Within 6 months of any accidental release meeting the five-year accident history reporting criteria
    - The five-year accident history portion *(68.168)*
    - Date of the most recent incident investigation and the expected date of completion of any changes resulting from the investigation *(68.175(j) and (l))*

Required Corrections to the RMP

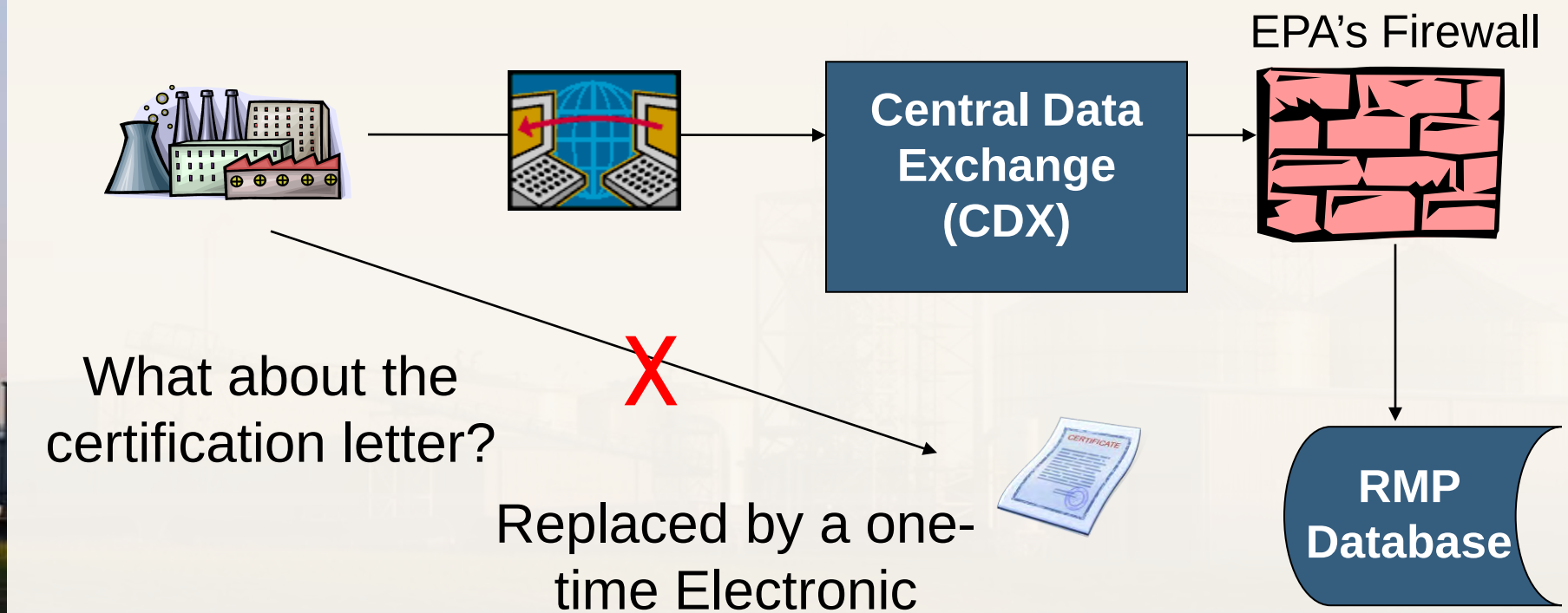
- Emergency contact information *(68.195(b))*
  - Within one month of any change in the emergency contact information required under 40 CFR 68.160(b)(6)

Common Deficiency

RMP*eSubmit

- New in 2009
- Web-based through Central Data Exchange (CDX)
- Streamlined process

RMP*eSubmit
RMP Submission via the Internet

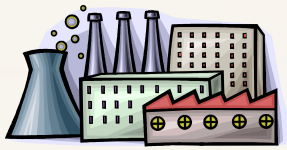


Electronic Signature Agreement

- Certification statement
- Works like electronic signature agreement for other CDX-based systems (TRI-MEweb, etc.)
- Time to process can be a couple weeks, so don't wait until the night before you need to file to start the ESA process

How the Electronic Signature Process Works

1. Facility Owner/Operator obtains Login ID & Password



CDX

2. Fill out electronic Signature Agreement

Mail to Reporting Center

3. Reporting Center connects CDX ID with one or more RMP Facility IDs

RMP Reporting Center

Central Data Exchange (CDX)

- EPA's secure portal for data entry and retrieval
- Other data systems currently using CDX
  - AQS, eBeaches, eIUR, LEAD, NEI, NESHAPS, PMN, RCRA, SDWIS, TRI-ME, TSCA, UCMR2, RMP*WebRC
- Facilities use CDX to gain access to RMP*eSubmit
- Facilities can use their existing CDX account

Accessing CDX

- Open internet browser and navigate to

  https://cdx.epa.gov

  - NOTE the https—this is a secure internet site, and should appear as such in your browser.
- If you receive a "Certificate Error: Navigation Blocked" screen, override it by clicking on "Continue to this website (not recommended)"

Publications

- See www.epa.gov/emergencies/rmp
  - A Checklist for Submitting Your Risk Management Plan (RMP) for Chemical Accident Prevention
  - RMP*eSubmit User's Manual
  - RMP Fact Sheet
  - The General Duty Clause Fact Sheet
  - Chemical Emergency Preparedness and Prevention in Indian Country
  - Updated RMP technical guidance documents (General guidance, industry sector guidance, OCA guidance)

Resources

- For more information on setting up your RMP*eSubmit account, or to see if there is an upcoming webinar on eSubmit, go to

  http://www.epa.gov/osweroe1/content/rmp/rmp_esubmit.htm

- For reporting issues, contact the **RMP Reporting Center**

  (703) 227-7650 (M-F, 8 am to 4:30 pm eastern time)

  RMPRC@epacdx.net

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

  Courier & Overnight Delivery
  RMP Reporting Center
  c/o CGI Federal, Inc.
  12601 Fair Lakes Circle
  Fairfax, VA 22033

- Contact EPA Region 7 Compliance Assistance staff (George Moody) or the Nebraska Coordinator (Terri Blunk)

EPA Region 7 Compliance Assistance Contact Information

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Questions?