### Five-Year Accident History





#### Overview

- □ The 5-year accident history covers certain releases
  - The release must be from a covered process and involve a regulated substance held above its threshold quantity in the process
  - □ The release must have caused at least one of the on-site <u>or</u> offsite effects shown in the following table (40 CFR 68.42(a))

| On-site                       | Off-site   |
|-------------------------------|--|
| ✓ Deaths                      | ✓ Deaths   |
| ✓ Injuries                    | ✓ Injuries   |
| ✓ Significant property damage | ✓ Evacuations  |
|                               | ✓ Sheltering in place  |
|                               | <ul><li>✓ Property damage</li><li>✓ Environmental damage</li></ul> |
|                               | ✓ Environmental damage   |



### Five-Year Accident History



- Report only accidents involving listed substances
  - If a person falls off a walkway due to a spill, it counts
  - No reportable quantity (RQ)
    - If release causes items
      mentioned on previous slide,
      it must be reported

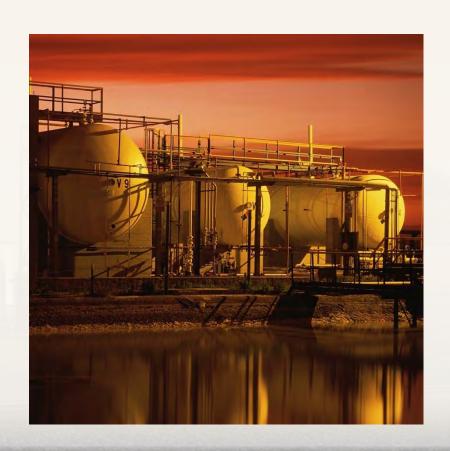


- Required data includes
  - Date
  - Time
  - Release duration
  - Chemical(s)
  - Quantity released
  - Release event
    - Gas release
    - Liquid spill/evaporation
    - Fire
    - Explosion
    - Uncontrolled/runaway reaction





- □ Release source
  - Storage vessel
  - Piping
  - Process vessel
  - Transfer hose
  - Valve
  - Pump
  - Joint
  - Other





- Weather conditions
  - Wind speed and direction
  - Temperature
  - Stability class
  - Precipitation present
  - Unknown







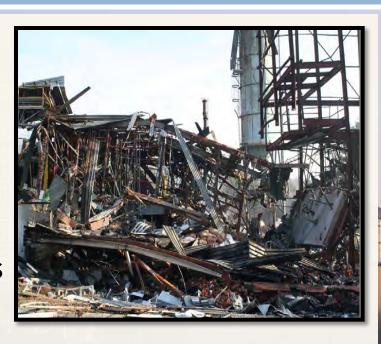








- On-site impacts
- Known offsite impacts
- Initiating event
- Contributing factors
- Whether offsite responders were notified
- Changes introduced as a result of the accident





## Required Information—RMP Executive Summary

□ Brief description of the five-year accident history (40 CFR 68.155(d))





# Timeframe Requirements for Reporting

- □ When an RMP is first submitted
- When an RMP is updated
- Within 6 months of an accident





### 5-Year Accident History

OSHA's Form 300 (Rev. 01/2004)

#### Log of Work-Related Injuries and Illnesses

You must record information about every work-related death and about every work-related injury or times that involves loss of consciousness, restricted work activity or job transfer, days away from work or medical treatment beyond first aid, You must also record stantional work-related injuries and lithesaes that are diagnosed by a physician or licensed health

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

ear 20

Form approved OMB no. 1218-0176

U.S. Department of Labor Occupational Safety and Health Administration

care professional. You must also record work-related injuries and linesses that meet any of the specific recording criteria listed in 28 CFR Part 1904.8 through 1904.12. Feel free to use two lines for a single case if you need to. You must complete an injury and filness incident Report (OSHA Form 301) or equivalent form for each injury or filness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help. Identify the person Describe the case Classify the case CHECK ONLY ONE box for each case Enter the number of Check the 'Injury" column or based on the most serious outcome for Job title Where the event occurred Describe injury or illness, parts of body affected, Employee's name Date of injury choose one type of illness: (e.g., Loading dock north end) (e.g., Welder) oronset and object/substance that directly injured or made person ill (e.g., Second degree burns on Remained at Work of illness right forearm from acetylene torch) Days away Job transfer transfer or or restriction able cases 00000 morehétes 00000 menth/day 0 0 0 0 0 00000 micrehiday 00000 month/day month/day month/day 00000 month/day morniskiak Page totals Be sure to transfer these totals to the Summary page (Form 300A) before you post it Public reporting burden for this collection of information is estimated to average 14 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comment about those estimates or any other septem of this data collection, outside: US Department of Labor, OSHA Office of Statistical (1) (2) (3) (4) (5) Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, D.C.20210. Do not send the completed forms to this office.



### Common Deficiencies

- Failure to report
  - Accidents with amounts below the CERCLA/EPCRA RQs
  - Triggers that require reporting (in accident history)
  - Accidents requiring more than first aid (when person was sent to a hospital just for "observation" or "preventative medicine")
  - Offsite data ("do not know accurate number")



### Common Deficiencies

- Failure to update the RMP within 6 months to include
  - An updated brief description in the executive summary
  - Section 6 information



### Additional Thoughts

- Not all accidents in Section 6 may trigger an incident investigation (and vice versa)
- If an accident occurs which changes the program level from 1 to 2 or 3, facility has 6 months to establish the new program level and resubmit the RMP
- Consider adding EPCRA/CERCLA reportable events to the RMP executive summary