

CHEMICAL EMERGENCY PREVENTION AND PLANNING *BULLETIN*



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Editor's Note: The goal of part 68 — the Risk Management Program — is to prevent accidental releases of substances that can cause serious harm to the public and the environment from short-term exposures and to mitigate the severity of releases that do occur. The regulation requires that the owner or operator shall perform an initial process hazard analysis (hazard review) on covered processes and be updated and revalidated at least every five (5) years after the completion of the initial process hazard analysis.

If your Program 3 process is also subject to OSHA PSM, you can use the PHA conducted for OSHA PSM compliance as your initial process hazard analysis for EPA purposes, provided you conducted your initial OSHA PHA prior to May 26, 1997 (the date by which all initial OSHA PHAs must have been completed). In such cases, you can also update and revalidate your PHA on OSHA's schedule, but your update should consider offsite impacts. Likewise, any initial PHA performed after May 26, 1997 must consider offsite impacts in order for it to satisfy EPA's requirements. Further EPA guidance can be found here: <http://www2.epa.gov/rmp/general-rmp-guidance-chapter-7-prevention-program-program-3>

What is your role in Hazard Identification and Risk Analysis?

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www.aiche.org/ccps



In September of 1998, there was a fire in a natural gas processing facility in Longford, Australia. The fire resulted in 2 fatalities, 8 injuries, and disruption of the gas supply to the state of Victoria for several weeks. A Royal Commission investigation concluded that a HIRA study could have identified the potential failures that caused the incident. Unfortunately, the HIRA study was planned but never conducted. Planning to do something is important. Actually doing it is required for success.



REPORT

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Hazard Identification and Risk Analysis (HIRA)

Hazard Identification and Risk Analysis (HIRA) includes all activities involved in identifying hazards in your process, understanding potential incident scenarios, identifying safeguards, and evaluating risk to people, the environment, property, and business. Your plant may call this review a Process Hazard Analysis (PHA), a name used in regulations in some countries, including the USA. CCPS now uses the term “HIRA” because it specifically includes risk analysis, which has become a part of this activity in many companies in recent years. Regulations in the USA and many other countries, as well as many company process safety standards and policies, require participation of front line workers in HIRA/PHA studies – plant operators, maintenance workers, and other people directly involved with operating and maintaining the plant equipment.

There are a number of techniques which are used for HIRA/PHA. The most common HIRA techniques in the process industries include “what if?” analysis, checklists, a combined what if/checklist, hazard and operability (HAZOP) studies, and there are also other techniques. Your plant may use some combination of these methods, and you may have a different name for your HIRA/PHA procedure. Regardless of the technique used, the role of the plant worker is critical. You operate and maintain the equipment every day, understand how it actually works, and, perhaps more importantly, how it can fail. It has been said that there are actually three plants – the plant that the engineers and managers think is there, the plant that the operators initially think is there, and the real plant. One of your key roles is to help make those three plants the same!

What can you do to contribute to a better HIRA (PHA)?

- ◇ If you are asked to participate in an HIRA/PHA study, here are some things you can do to help make it better:
- ◇ Share your knowledge of how the steps in a procedure are actually executed, especially if this is different from what is written. Explain the reasons to the HIRA/PHA team so they can resolve them and make the actual and written procedures the same.
- ◇ Before the HIRA/PHA, talk to your colleagues about what you will be doing. Ask them to tell you about any issues that they want to be sure the team discusses.
- ◇ Share your years of operating experience, and that of your co-workers, about the reliability of equipment, instrumentation, and alarms or safety systems. Make sure the team knows what works, what doesn't work well, and what has gone wrong in the past.
- ◇ Verify that any operator action – for example, action in response to an alarm – which the team considers a safeguard, is understood by operators, and can be done reliably in the time required to keep the process safe.
- ◇ Don't be shy! Proactively share your knowledge and experience, and don't wait for somebody to ask.

Remember that your role is both to learn and to teach. You can learn from the other experts in the HIRA/PHA, and they will learn from you, particularly about how things really work in the plant. Share what you learn with your co-workers after the HIRA/PHA is completed.

Use your experience to help do a good HIRA/PHA and make your plant safer!

This bulletin provides information on the EPA Risk Management Program, EPCRA, SPCC/FRP and other issues relating to Accidental Release Prevention Requirements. The articles contained herein are provided for general purposes only. EPA does not accept responsibility for any errors or omissions or results of any actions based upon this information. Please consult the applicable regulations when determining compliance. Mention of trade names, products, or services does not convey, and should not be interpreted as conveying official EPA approval, endorsement, or recommendation. 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 and 40 CFR Part 355/370 for EPCRA.