



# CHEMICAL EMERGENCY PREVENTION & PLANNING

*Newsletter*



January - February 2011

US EPA Region 10

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### CHEMICAL EMERGENCY PREVENTION & PLANNING Newsletter

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**REPORT**

**CHEMICAL or OIL SPILLS**  
to the NATIONAL RESPONSE CENTER

**1-800-424-8802**

## New Feature

### Best Practices from the Field

*Through RMP training and inspections we meet many talented people with innovative ideas. This new feature in the CEPP Newsletter "Best practices from the field" will feature the know-how and best practice methods from facilities with excellent safety programs. The first article presents an example of how to manage your RMP/PSM documents. We thank the author, Dawn Kominski, Director of Regulatory Affairs, Tessengerlo Kerley, Inc. for sharing this "best practice".*

### RMP/PSM Document Management

The Risk Management Program is very paperwork intensive and adequate recordkeeping is a constant challenge. For companies with multiple locations having a written, uniform system for recordkeeping is essential to maintaining RMP and PSM (Process Safety Information – OSHA) documentation.

A written recordkeeping program detailing where documentation should be stored allows for any employee at a site to find needed information. This is important if the person normally responsible for the information is out and another employee needs a document. It is especially important during an audit if key personnel are out of the office. For employees that travel between multiple sites, a uniform program allows them to easily find documentation regardless of which site they are visiting.

To help our facilities conquer the paperwork challenge, an internal corporate document was developed that detailed how RMP documents are to be stored. The general framework is as follows:

- A separate area is to be designated for RMP documents. This area could be a file cabinet or even a separate room.
- All documents are to be filed by RMP element. This allows documents to be retrieved by element at any time.
- If information is not in the specific RMP element folder, a docu-

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## Best Practices from the Field

### *RMP/PSM Document Management*

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ment is to be inserted stating where the information can be found (i.e., operating procedures - control room; equipment files - maintenance building).

- The RMP area is to be accessible at all reasonable times to employees.

Having a separate area for all documents and/or a list of where the documents can be found is helpful in keeping the documents updated and during an audit or inspection. It also gives employees one place to find critical information. For smaller facilities where there may not be room for a separate office/area for RMP information, a conference room works well. Conference rooms are typically located in common areas and may be large enough to add a file cabinet.

Once information is gathered in one area, keeping the information updated is the next challenge. The written document control program can be used to detail responsibilities for updating information or a separate responsibilities document can be generated. The responsibility section can be as detailed as a responsibility list for each separate document or it can be very general and state what job functions have an impact on updating the various RMP documents. The person(s) that have the responsibility for updating RMP information may vary by facility depending on available staff and whether there are corporate resources available to assist the facility.

A written program for recordkeeping (location and updating requirements) does not need to be elaborate. However, having a written program will help small and large facilities in their efforts to maintain up-to-date records and can be especially helpful to maintaining RMP documentation as employees change over time. *(See sample document in next article.)*

### RMP Document Control continued: Example of recordkeeping program

## RMP/PSM Filing and Document Control/Circulation Policy

- The plant shall maintain a separate PSM filing system
- Separate files will be maintained for each PSM element, with sub-files for each heading as listed below.

### 15. Risk Management Plan Specific Information (RMP Binder)

#### 15.1 Copy of the most current plan which includes:

- Registration Information
- Worst-case release scenario analysis
- Alternative release scenario analysis
- Off-site impacts including
  - Population
  - Environment
- 5 year Accident History
- Prevention Program
- Emergency Response information
- Executive Summary

#### 15.2 Copy of any plan updates

#### 15.3 Appendices of backup information

- Scenario descriptions, estimated quantity released, rate, duration
- Methodology used to determine distance to endpoint
- Data used to estimate population and environmental receptors
- Coordination with local emergency responders

#### 15.4 Management System

- Document identifying person or position with overall responsibility of the risk management program
- Document other persons responsible for implementing individual requirements of the risk management program

Find the complete document in the Tools Section of the Region 10 RMP webpage where all Best Practices Sample Documents can be downloaded.

[Link.](#)

# How to apply your document control system – *Has anybody seen our process safety information (PSI)??* (Reprinted from Process Safety Beacon 9/2010)

What is Process Safety Information (PSI)? It is the information about the process chemistry, equipment and technology of your plant. It is collected from many places inside and outside your company: research and development, engineering, operations, and also suppliers of raw materials, process technology, and equipment. As an operator or maintenance person, your first exposure to the PSI may have been at a Process Hazard Analysis (PHA). The PSI was that stack of drawings, manuals, documents, and books that provided information to the PHA team. PSI is also frequently used in Management of Change (MOC) reviews. It is important to understand the existing system so you can evaluate the consequences of proposed changes. For example, a new valve must meet the specifications for the pipe where it is installed. That means the valve, gaskets, bolts, and other components all need to be correct. How do you know? Verify them according to the piping specifications in the PSI from the plant engineering design.

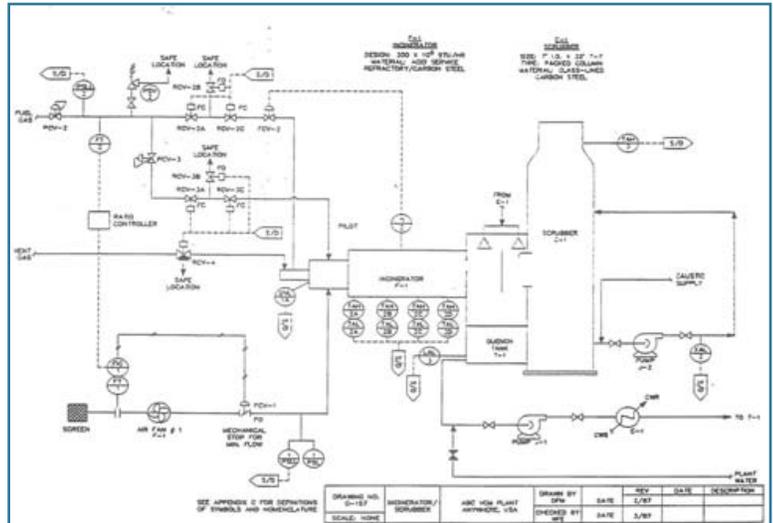
Some other important examples of PSI include piping and instrumentation drawings (1), hazardous area classification drawings (2), and the reports from process hazard analyses (3), management of change reviews, incident investigations, personal protective equipment requirements, operating and maintenance procedures, and others.

### What can you do?

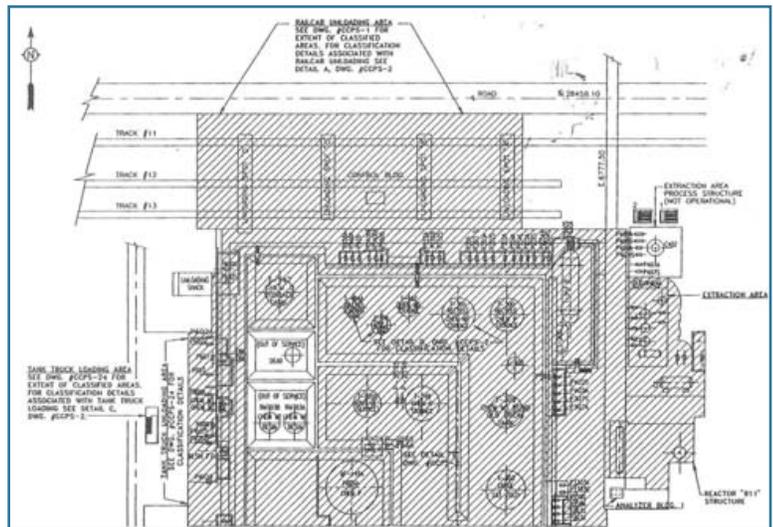
PSI is essential to safe plant operation and maintenance, but it is valuable only if it is correct, up to date, and used. **And you must know where to find it!** Here are some examples of things you can do to ensure that the PSI for your plant is correct, and we are sure you can think of many other examples:

- If asked to go into the plant and update piping drawings, take that job seriously.

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1. A piping and instrumentation drawing (P&ID)



2. A hazardous area classification drawing

PHID No: E-230  
 Revision: D  
 Meeting Date: 9/5/90  
 Team: Mr. Smart, Mr. Associate, Ms. Piper, Mr. Stedman, Mr. Voit (all from the ABC Anywhere Plant)

Item Number	Deviation	Cause <sup>a</sup>	Consequences	safeguards	Actions
1.0 LINE – AIR SUPPLY LINE TO INCINERATOR (INTENTION: SUPPLY 15,000 SCFM OF AIR TO INCINERATOR AT AMBIENT TEMPERATURE AND 3 IN. WC)					
1.1	No flow	1 – Air fan #1 fails off 2 – FCV-1 fails closed 3 – PT-1 fails – high signal 4 – ST-3 fails – low signal	A – Incinerator shuts down. Possible release out the recovery stack. Potential incinerator explosion if shutdown interlocks fail	1 – Redundant fan on standby with support A – Low-low air pressure (PSLL-1) shutdown interlock 1.1.1.4.6 – Multiple indicators	1 2

3. Part of the documentation of a Process Hazard Analysis (PHA) study

**RMP/PSM Document Management***continued from Page 3*

A valve not shown on the drawing may be the difference in preventing a spill – you can't close it if you don't know it is there!

- If you find that an operation is normally done differently from the written operating procedure, tell your supervisor, so that either the procedure is modified, or the operation is done as required by existing procedures.
- If you find an error on a drawing, tell your supervisor or plant engineer so it can be corrected.
- If you are trying to use a drawing and there are too many corrections, tell your supervisor an engineer that the corrections make the drawing confusing, and a new drawing is needed.
- Remember that control system documentation is part of the PSI and must be updated when changes are made.

**Plan to attend the FREE EPA Risk Management Training Day in your area**

# RISK MANAGEMENT PROGRAM (RMP) Training

**Eugene, Oregon - March 17, 2011**

**Boise, Idaho - May 16, 2011**

**Seattle, Washington - Coming Fall 2011**

Additional information can be found on EPA Region 10's RMP Website: [Training Information](#)

**Where Do I Go For More Information?**

<http://www.epa.gov/emergencies/rmp> will be updated as new information becomes available.

EPA maintains numerous listservs to keep the public, state and local officials, and industry up to date, including several that pertain to emergency management. You can sign up for our list serve to receive periodic updates: [https://lists.epa.gov/read/all\\_forums/subscribe?name=callcenter\\_oswer](https://lists.epa.gov/read/all_forums/subscribe?name=callcenter_oswer)

EPA Region 10 RMP Coordinator:  
Javier Morales 206-553-1255

EPA Region 10 RMP Website:  
<http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/rmp>

**Superfund, TRI, EPCRA, RMP & Oil Information Center**

The Information Center can also answer questions related to Clean Air Act section 112(r) and RMP reporting requirements.

(800) 424-9346 or TDD (800) 553-7672  
(703) 412-9810 or TDD (703) 412-3323 in the Washington, D.C. area

Normal Hours of Operation:

Monday - Thursday 10:00 a.m.

- 3:00 p.m. Eastern Time

Extended Hours of Operation

(May, June, and July):

Monday - Friday 9:00 a.m. -

5:00 p.m. Eastern Time

Closed Federal Holidays

<http://www.epa.gov/superfund/contacts/infocenter/>

**Risk Management Program (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@epa.cdx.net](mailto:RMPRC@epa.cdx.net) (e-mail)

This newsletter provides information on the EPA Risk Management Program, EPCRA, SPCC/FRP 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.