



CHEMICAL EMERGENCY PREVENTION & PLANNING

Newsletter



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US EPA Region 10

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CHEMICAL EMERGENCY PREVENTION & PLANNING Newsletter

US EPA Region 10,
OCE, OCE-084
1200 6th Avenue, Suite 900
Seattle, Washington 98101

206.553.1255
Fax: 206.553.0124

[R10 RMP Webpage](#)

Newsletter Contacts:
For **RMP**: Javier Morales at
morales.javier@epa.gov

For **SPCC/FRP**: AK: Matt Carr at
carr.matthew@epa.gov

WA OR ID: Michael Sibley at
sibley.michael@epa.gov

For **EPCRA**: Suzanne Powers at
powers.suzanne@epa.gov

For free **Subscription**:
morales.javier@epa.gov

Editor's note: It has been my pleasure to edit the CEPP Newsletter for the past five years. Before moving on I want to take this opportunity to thank all who contribute to the process, especially those facilities that submitted their ideas for "Best Practices."

EPA'S Region 10 Risk Management team will continue to produce the newsletter bringing you ideas to help improve your safety program.

-- **Stephanie Allen, Risk Management Specialist, EPA Region 10**

Manage Temporary Changes!

Use your Management of Change process for "temporary" changes!

([Process Safety Beacon](#) 10/2012)

A filter on the suction of a pump frequently plugged. Because of this, the pressure needed to be monitored, both in the field and at the control panel. To minimize installation time for a pressure transmitter, it was decided to install a tap on the existing connection for the local pressure gauge and connect a pressure transmitter to this tap. Because of the rush and the temporary nature of the change, it was decided to use tubing for the change. The installation, though accepted as a temporary installation, did not follow appropriate design codes or engineering standards, and no management of change review was done. Approximately three years later, the tubing ruptured and combustible material at a temperature of 360° C leaked to the atmosphere. The leaking material ignited and started a major fire which destroyed the plant.



pendulum. Tubing does not have adequate mechanical strength to withstand vibration and to support instrumentation, such as the pressure transmitter.

Why did it happen?

- The temporary installation did not follow appropriate engineering design standards.
- The piping and the temporary installation were subject to vibration caused by the pump.
- The pressure gauge installed at the end of the tubing acted as a
- After the cause of the plugging filters on the suction pipe of the pump was eliminated, the temporary installation and the pressure transmitter were not needed, but were never removed.
- As a "temporary" installation, the pressure gauge may not have received attention, inspection, and maintenance, particularly after it was no longer needed. It may just have been forgotten!

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Manage Temporary Changes!

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What can you do?

- Follow your plant's Management of Change procedure for all modifications of piping, equipment, and procedures.
- Remember that temporary modifications require the same thorough analysis as permanent changes.
- Never make changes to piping or equipment without review by qualified experts to assure that the change follows engineering standards and good practice.
- Follow recommendations from the manufacturer of your equipment.

- If "temporary" modifications are made to a plant, they should have an "expiration date", and be removed before that date. You should do another management of change review for removal of the temporary installation. Don't let a temporary change become permanent without review!
- If you see equipment in your plant which is no longer used or needed, suggest that it be removed!

To read more on Management of Change: [Nov 2011 CEPP](#)

Why You Need a Crisis Communication Plan:

([Gatekeeper Newsletter](#) 10/1/12)

Being prepared means you should already have a plan that addresses crisis communication. Why? Companies that isolate themselves in times of crisis will be blamed by a distrustful public. Companies that openly and honestly deal with the press and the community are apt to receive fair coverage resulting in improved public perception and trust --even in the face of problems.

What's In the Plan?

A crisis communications plan should outline the steps that ensure an adequate facility response to the press and the community at large in the event of an accident. Adequate planning provides the essential foundation upon which successful crisis communication is built. The crisis communications plan should address:

- Company policy on public communication
- Company background document
- Spokesperson and duties
- Media contacts development
- Interview policy

Practicing crisis planning for a chemical emergency is 95 percent of the game. Effective on-the-scene crisis communications depends on the preplanning: the choice of a spokesperson, the ability to follow the plan, and ability to perform well during interviews and press conferences.

Practice the Plan

Ok so you've got your plan together but without practice, attempts at crisis communication are often unsuccessful. Without a plan, the chances of success diminish. Planning alone is not enough. The plan must

be practiced. Written exercises and simulations are both excellent training tools to ensure that the plan works, that the thinking among management officials is sound and consistent, and that interviews will be conducted successfully.

The following hypothetical crisis exercise is an example of a useful and painless training tool. A truck carrying a volatile chemical intermediate that your facility uses in pesticide formulations overturns en route to your facility. Four drums in the shipment are breached. Containment and cleanup are well under way without further mishap when the local newspapers and TV camera crews arrive. The camera person, who, of course, is wearing no protective gear, strays too close to the leaking drums and is overcome by the vapors. He is quickly taken to the hospital, where he is resting comfortably the next day.

Answer these questions:

- How do you deal with the irate TV station manager?
- What do you tell the rest of the media about the mishap?
- How do you address the fears of local parents whose children attend school one-quarter mile away from the accident scene? How could the injury to the camera person have been avoided?
- What would you do differently next time?

This type of exercise, together with emergency response simulations, is invaluable. With practice, you will know better when to activate your plan and increase the chances that you will follow the plan that you worked so diligently to develop.

EPA Settles with Fruit Storage Facility

Region 10 settled with a fruit cold storage facility, Olympic Fruit Company, LLC, (Olympic Fruit), Moxee, Washington, for violation of the Clean Air Act (CAA) § 112(r) risk management program (RMP) requirements. The Region alleged that Olympic Fruit failed to submit their risk management plan to EPA since September 1, 2004 and was in violation of 40 C.F.R. § 68.150. The violation has since been corrected by Olympic Fruit. The facility utilizes more than 10,000 pounds of anhydrous ammonia. Under the terms of the Consent Agreement and Final Order, Olympic Fruit will pay a penalty of \$33,964, and spend at least \$40,659 implementing a Supplemental Environmental Project (SEP) in three parts.

The first part of the SEP requires Olympic Fruit to install ammonia detection sensors in seven (7) roof mounted dog house structures on one of the fruit storage buildings, and five (5) ammonia detection sensors in main relief exit headers. These ammonia detectors connected to the refrigeration system computer control will auto-dial the operators for the early detection of a release of ammonia and allow for a more immediate response and effective response to a release. The second part of the SEP requires Olympic Fruit to install two "king solenoid" valves and the

"Emergency Pressure Control System" (EPCS) in the machine room to improve the integrity of the facility's refrigeration system and significantly reduce the risk of a release of ammonia into the environment and to the surrounding population. The EPCS will prevent an overpressure event at the facility and shutdown the machine room to mitigate an ammonia release from occurring, activate an audible alarm and auto-dial the operators during the event. The two "king solenoid" valves will allow the ammonia liquid supplies from the high pressure receiver to be stopped immediately by pressing the emergency button, if an ammonia release would occur. The third part of the SEP requires Olympic Fruit to purchase a hand held ammonia detector for the East Valley Fire Department that will reduce the risks of exposure to ammonia for emergency responders who are responding to an ammonia release. The implementation of these SEPs will secure significant environmental benefits by improving emergency management to allow a more immediate and effective response in the event of an accidental/inadvertent sudden release of ammonia, and reduce the risk of a release of ammonia into the environment.

Contact: Javier Morales, 206-553-1255.

Where Do I Go For More Information?

RMP Materials EPA's Web site: <http://www.epa.gov/emergencies/content/rmp/index.htm> includes the Risk Management Program rule, Off-Site Consequence Analysis specific guidance and calculator, the list of regulated substances, fact sheets, guidance documents, industry-specific model plans, FAQs, the RMP*eSubmit Users' Manual, and other information.

EPA RMP Region 10

RMP Coordinator: Javier Morales 206-553-1255

EPA Region 10 RMP Website: <http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/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. Contact the RCRA, Superfund, and EPCRA Call Center for your policy, regulatory compliance, and reporting requirements questions.

800-424-9346 Toll Free or TDD 800-553-7672
Monday – Thursday: 10:00 AM – 3:00 PM
Eastern Time Extended Hours of Operation
(May, June and July): Monday – Friday: 9:00 AM – 5:00 PM Eastern Time (Closed Federal Holidays) <http://www.epa.gov/superfund/contacts/infocenter/>

RMP*eSubmit Software Support Contact the RMP Reporting Center for specific software questions about RMP*eSubmit. (703) 227-7650 (phone) Monday – Friday: 8:00 a.m. – 4:30 PM ET. Closed Federal Holidays RMPRC@epacdx.net (e-mail)

LISTSERVS 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 [listserv](http://listserv.epa.gov) to receive periodic updates: https://lists.epa.gov/read/all_forums/subscribe?name=callcenter_oswer

This newsletter provides information on the EPA Risk Management Program, EPCRA, PCC/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, 40 CFR Part 355/370 for EPCRA, and 40 CFR Part 112.2 for SPCC/FRP.

Upcoming Risk Management Training in 2013



Plan to attend the FREE EPA Risk Management Training Day

**RISK MANAGEMENT PROGRAM (RMP) Training
Pocatello, Idaho - April 3, 2013**

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