Here's what you need to know about RMP*Submit

Note: this document is based on the RMP Submit beta test version. The final electronic submittal version may vary somewhat.

RMP*Submit is a computer software program that allows you to submit your risk management plan (RMP) electronically. The program allows for data input but does not have the capability to determine release endpoints, latitude and longitude coordinates or affected populations.

RMP*Submit stems from industrial work group comments that not only wanted RMPs submitted to a central point, but also wanted an electronic submittal and retrieval system for these plans. Motivation for the electronic format was to make the process and plans accessible to the public in an economic and technically feasible manner.

RMP*Submit has 10 sections. The plan begins by providing registration information and ends with an executive summary, whereby the facility owner can put the plan in "his or her own words." An overview of the 10 sections of the submittal program follows.

Note: EPA assumes you will submit your RMP electronically unless you specifically "opt out" for paper.

Section 1. Registration

The first section of the risk management plan to fill out is facility registration. Registration consists of facility identification information available from other sources, including your EPCRA Tier I or II reports and Toxic Release Inventory Form R reports. Registration information must include the following:

- The covered processes being reported
- The process chemicals being reported for each process, and
- North American Industrial Classification System (NAICS) codes for each process

Some specific information necessary also includes, but is not limited to:

- Facility and parent company(ies) name(s)
- Location address, including latitude and longitude
- Owner or operator name, phone, address
- Name and title of person responsible for implementation
- Name, title and phone number of the emergency contact
- 24-hour phone number and extension/pin number
- Local LEPC
- Last safety inspection date and performer
- Process specific information

Overview of off-site consequence analysis

Sections 2 through 5 focus on off-site consequence scenarios. Two classifications of covered chemicals exist — toxic and flammable. One worst-case scenario is applicable to each category of processes. However, for alternative scenarios, one scenario is necessary for each regulated toxic chemical, and one scenario will encompass all flammable substances. Within the program, you will only need to fill out the sections (toxic or flammable) relevant to your facility.

Section 2. Toxics: Worst-case releases

For worst-case releases, most of the modeling parameters are already preset. Release time for the vessel is 10 minutes; wind speed and atmospheric stability class are already specified; and no active mitigation can be considered. However, passive mitigation systems such as dikes, enclosures and buildings can be considered. Endpoint determination is based on the Emergency Response Planning Guideline 2, developed by the American Industrial Hygiene Association. Some of the information required includes the following:

- Chemical name
- Percent weight of chemical in mixture
- Physical state (gas or liquid)
- Results basis
- Quantity released
- Release rate and duration
- Wind speed, atmospheric stability class and topography
- Distance to the endpoint
- Public receptors within distance to endpoints
- Environmental receptors within distance to endpoints

Section 3. Toxics: Alternative releases

All information required in the worse-case scenario is necessary here as well. However, within this section, you are able to enter data more realistic for your site and do not have to use the previously preset endpoint modeling conditions. Additionally, active mitigation

systems, which include flow valve controls, emergency shutdown systems, sprinkler systems and the like, are to be factored in when determining accidental release endpoints.

Section 4. Flammables: Worst-case releases

This section is similar to section 2, with all data requirements being the same. The only difference is that endpoint determination for flammables is the location where, for vapor cloud explosions, the endpoint is 1 psi overpressure. Again, only passive mitigation systems can be considered and the release scenario is predetermined.

Section 5. Flammables: Alternative releases

Again, this is your chance to model a release scenario more realistic for your facility. Remember to include all active mitigation systems at your site.

Section 6. Five-year accident history

Report accidents for listed substances only. If you have had an accident at your site within the last five years, then information related to the accident, including at least the following, must be reported:

- Date and time
- Release duration and quantity released
- Percent weight of toxic chemical in mixture
- Release event and source
- Weather conditions
- On-site and off-site impacts
- Initiating event
- Contributing factors
- Off-site responders notified
- Changes introduced as a result of the accident

Section 7. Prevention program for program 3 processes

All program 3 prevention programs contain at least:

- Chemical name
- Safety information and training
- Hazard review
- Date of last review or revision of operating procedures
- Maintenance
- Management of change
- Compliance audits
- Incident investigation
- Date of most recent change that triggered review/revision of employee participation plans
- Date of last review/revision of hot work permit procedures
- Date of last review/revision of contractor safety procedures
- Date of last evaluation of contractor safety performance

Section 8. Prevention program for program 2 processes

While not requiring as much information as the program 3 prevention plan, program 2 plans must still contain at least the following information:

- Chemical name
- Safety information and training
- Hazard review
- Date of last review or revision of operating procedures
- Maintenance
- Compliance audits
- Incident investigation
- Date of most recent change that triggered review/revision

Section 9. Emergency response program

When developing your emergency response plan, consider the following:

- Is your facility included in the community emergency response (ER) plan?
- Does your facility have a written ER plan?
- Does your ER plan include specific actions to be taken in response to accidental releases of regulated substances?
- Does your ER plan include procedures for informing public and local agencies responding to accidental release?
- Does your ER plan include information on emergency health care?
- The date of the last review, or update, of your ER plan?
- The date of last ER training for your employees?
- With which local agency is your ER plan coordinated?
- Are you subject to other federal or state emergency plan requirements?

Section 10. Executive summary

The executive summary is your chance to explain, in your own words, risks that exist at your facility and steps you have taken to minimize those risks. The executive summary will include the following:

- You accidental release prevention and ER policies
- Description of your facility and substances handled
- Worst-case and alternative release scenarios
- General accidental release prevention program and chemical-specific prevention steps
- Five-year accident history summary
- Mitigation measures and administrative controls implemented
- Emergency response program
- Planned changes to improve safety

For more information on the electronic RMP*Submit, check our Web page at www.engg.ksu.edu/enggext/ppi, or call the Small Business Environmental Assistance Program at 800-578-8898.

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The Small Business Environmental Assistance Program's (SBEAP) mission is to help Kansas small businesses comply with clean air regulations. SBEAP operates through a consortium of the University of Kansas, Kansas State University and Wichita State University. This fact sheet was published by Kansas State University's Pollution Prevention Institute. For more information, call 800-578-8898 or send e-mail to SBEAP@ksu.edu. The University of Kansas, Kansas State University and Wichita State University are EEO/AA providers.