

PREPARING FOR AN RMP AUDIT: PROBLEM AREAS AT ILLINOIS AG RETAIL FACILITIES

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Why Do Retailers Have Problems Complying With RMP Requirements?

- Attrition
- Submission Required Every 5 years
- Risk Management Plan vs. Risk Management Program
- Risk Management Plan Submitted to USEPA Through CDX (Central Data Exchange) Portal
- Risk Management Program Kept on File at the Ag Retail Facility – Consists of Documentation Required to Comply With RMP Regulation
- Passing the Buck
- MARPLOT

Attrition

- Person Responsible for Submitting the RMP Might be a Different Person Than Last Submission and Not Familiar With the RMP
- If Personnel Have Changed, Where is the Username and Password to Access CDX to Submit the Plan To EPA

5 Year Submission

- Using CDX (Central Data Exchange) and RMP eSubmit Once Every 5 Years to Submit a Risk Management Plan is not Enough to Become Familiar With the Program
- CDX and RMP eSubmit are Not the Easiest Programs to Navigate
- Some People are Simply Not Good With a Computer or Internet

Risk Management Plan

- Worst and Alternative Case Scenarios – RMP Comp or TFI's Degadis Model
- Largest Storage Tank on Site vs. Total Onsite Storage Capacity (Most People Forget to Include NH3 Nurse Tanks)
- Quantity and Size of Storage Tanks as wells as Nurse Tanks Usually Changes From Year to Year Changing Capacity and/or Scenarios as well as the Distance to Endpoint

Risk Management Plan

- Determining Population Within Radius of Distance to Endpoint
- MARPLOT, Plat Book, General Knowledge of the Area
- MARPLOT – Can Be a Difficult Computer Program to Navigate

Risk Management Program

- Risk Management Program Must be Kept on File at the NH₃ Storage Facility
- Standard Operating Procedures (SOP's) Specific to the Facility
- Hazard Review (Completed Every 5 Years)
- Compliance Audit (Completed Every 3 Years)
- Maintenance or Mechanical Integrity Manual for Equipment Used in Storage, Handling, Transfer of Anhydrous Ammonia
- Employee Training Records

Passing The Buck

- Common to put Someone in Charge of the RMP that Knows Nothing about the Regulation, CDX/RMP eSubmit Program or Paperwork Requirements
- Administrative Assistants, Applicators, Sales Personnel, etc....

Passing The Buck

All done filling
nurse tanks dad.



Passing The Buck

Good. Now start working on submitting the Risk Management Plan to EPA.



Passing The Buck

What the heck is a
Risk Management
Plan?



Passing The Buck

Call Uncle Kevin at
IFCA. He will help
you.



Illinois RMP Audit

- May 2014 US EPA Conducted an RMP Audit at an Ag Retail Facility
- Audit lasted approximately 7 hours
- SDS for Anhydrous Ammonia
- Amount of Maximum Intended Inventory of anhydrous ammonia stored on site
- Equipment Specifications (Maintenance Manual) for anhydrous ammonia equipment
- Last 2 hazard reviews including any recommendations and resolutions to recommendations

Illinois RMP Audit

- Site Specific Operating Procedures for the Anhydrous Ammonia System
- Employee Training Records
- Inspection, Testing and Maintenance Schedule for NH₃ Storage Tanks
- Incident Investigations for Last 3 Years (If Applicable)
- Last 2 Compliance Audits

Questions/Comments

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