TECH TIP

Bypassing EPA RMP Submittal Snags

Misunderstood EPA RMP Submittal elements, explained! Do not worry, you are not alone. Confusion surrounding the data to be input into the EPA RMP Submittal is all too common, which leads to inaccurate details and errors in the submittal process. Some reporting fields within the submittal are not self-explanatory and require further investigation, which takes time and effort to understand.

Luckily, assembled here is a small, cohesive "cheat sheet" that highlights the most common issues faced when submitting on RMP*eSubmit. With this guide, there is no need to dig through the entire User's Manual to address a frequent question/confusion. Simply take a few minutes to read this TechTip and feel all your submitting stresses drift away.

Correcting Common Errors

Below you will find the most popular errors/inaccuracies experienced during submission.   First, let us address the reporting mistakes that are not detectable by the RMP*eSubmit "Validate" feature:

- Facility and Parent Company Dun and Bradstreet Numbers (DUNS):

    o The Data Universal Numbering System (DUNS) is a nine-digit identification number that allows your facility to be cross-referenced to various business information.

    o If your facility has a DUNS number, it should be available from your treasurer, financial officer, or online search using the "DUNS Number Search" link provided in the "Resources" section at the end of this TechTip. Otherwise, leave this field blank.

    o If your facility does not have a parent company or the parent company does not have a DUNS number, leave this field blank.

- Number of full-time equivalent (FTEs) employees on site:

    o To determine the number of full-time equivalent employees who work at your facility, add together the fractions of full-time work performed by part-time or seasonal employees and round to the nearest whole number. Do not include contract employees. If your facility is unmanned or is only staffed by part-time employees, briefly explain these circumstances in the Executive Summary.

- Last safety inspection performed by an external agency:

    o In this case, an external agency is a regulatory agency (EPA, OSHA, state environmental agency, fire department, etc.), not a contractor.

- Entering the most up to date NAICS Code:

    o The 2012 NAICS codes list was updated in 2017 and implemented in 2019, so it is important to double check that your NAICS code is still accurate between 5-Year submissions.

o For example - Crude Petroleum and Natural Gas Extraction (2012 NAICS Code 211111) were broken into two new codes. These codes are 211120, Crude Petroleum Extraction and 211130, Natural Gas Extraction.

o Refer to the "Resources" section at the end of this TechTip for a comprehensive list of current codes.

• Residential population within distance to endpoint:

o Enter the estimated residential population to two significant digits per 40 CFR 68.30 (e.g., 2,500 people rather than 2,469). Refer to CFR link below.

• Section 9 – Emergency Response:

o If your employees do not respond to releases of regulated substances at your facility, only check the first two boxes (9.1.a and 9.1.b) and fill out the last three (9.7.a, 9.7.b and 9.8) emergency response data elements.

Second, let us address the reporting mistakes that cause an *error* in the RMP*eSubmit program:

• Date of most recent review or revision of operating procedures:

o For EPA RMP Program 3 facilities, the owner or operator shall certify **annually** that these operating procedures are current and accurate (40 CFR 68.69(c)). Therefore, the reported date must be less than a year old.

• Date of most recent compliance audit:

o A compliance audit is required every **three years**. Therefore, the reported date must be less than three years old. Compliance audit information can be found in the EPA RMP regulations within 40 CFR 68.58 for Program 2 facilities and within 40 CFR 68.79 for Program 3 facilities.

• Date of last Process Hazard Analysis (PHA)/Hazard Review (HR) or PHA/HR update:

o A PHA/HR is required every **five years**. Therefore, the reported date must be less than five years old. PHA information can be found in the RMP regulation within 40 CFR 68.67 and HR information can be found within 40 CFR 68.50.

Wait, there is more! Though this list was generated from questions we frequently receive from confused clients during the Submittal process, it is likely you will not find all your answers here. Readers can conveniently find more information on all other submittal issues by referencing the resource links provided below. Furthermore, you can call the RMP Reporting Center line at (703) 227-7650 for any questions regarding the RMP*eSubmit reporting software or the RMP Information Center at (800) 424-9346 for any questions regarding EPA RMP regulations and additional guidance.

Resources

Code of Federal Regulations (CFR)   EPA RMP Reference Manual

2017 NAICS Codes   DUNS Number Search

About the Author:
Ms. Klepacki is a Project Engineer and has supported a variety of activities associated with the California Accidental Release Prevention Program (CalARP), Environmental Protection Agency's Risk Management Plan (EPA's RMP) and Occupational Safety and Health Administration's Process Safety Management (OSHA's PSM) Program. She specializes in Five-Year Updates and Compliance Audits to evaluate accordance with current regulatory standards.