

## Risk Management Program (RMP) Updates Meet Tight Timeline & Simplifies Process

### The Challenge:

Updating a large facility's Risk Management Program (RMP) and submitting documentation to the EPA to meet the 5 year resubmittal deadline is a challenge. Existing documentation needs to be thoroughly reviewed and updated in a short timeframe to meet submittal deadlines. Many sites lack the personnel to perform updates or personnel assigned to perform the updates may lack the knowledge or training to confirm or update inventory calculations. Facilities may also need to meet additional state and local requirements beyond federal RMP which adds to the burden of complexity.

### Client Description

<b>Company</b>	Multiple Major Oil Refineries
<b>Project Location</b>	Multiple US Locations
<b>Industry</b>	Oil & Energy
<b>Annual Revenues</b>	\$20+ Billion
<b>Employees</b>	10,001+ employees
<b>RISK, Inc. Solution</b>	Program Development & Implementation: RMP Update

### The Solution:

RISK, Inc. has worked with several facilities to assist with RMP updates. Key tasks for RMP Updates include:

- Review of the previous RMP, including maximum intended inventory calculations, models and justifications
- Establish a timeline for completion of individual elements to meet compliance deadline
- Coordinate with owners of RMP elements to review and update elements as necessary
- Identify changes from previous RMP – inventory, materials, program levels
- Identify and incorporate local regulatory requirements
- Coordinate with technical groups for verification/validation of previous inventory calculations and offsite consequence scenarios
- Update of inventory calculations and offsite consequence scenarios where necessary
- Formalization and documentation of work process, including assumptions, justifications for program levels, certifications of accuracy
- Update and resubmittal of RMP document based on local regulatory agency review and comments

Our approach varied by site. For sites with personnel available to work on the RMP update tasks, we held an informational meeting (1 to 2 hours) with unit process engineers to review expectations for calculations. We reviewed the instructions for calculations and provided example calculations so that all engineers would use the same approach. During this site visit we also meet with PSM leads and gathered information on the prevention programs. We used an RMP Checklist job aid to track project milestones.

Process engineers were given 2 to 4 weeks to perform the inventory calculations. We reviewed the calculations and related information to confirm that calculations included any modifications or changes in units since the previous RMP and represented the current unit inventory. If inventories had changed, modelling was performed to update offsite consequence scenarios.

One site did not have the staff available to perform the update tasks. They also had over 30 processes and only a 10 week window to submit the documentation. We dedicated two key staff to assist the effort. One staff member was provided open access to documents and personnel to update the documentation on the program elements. The other staff worked with process engineers to review and update all inventory calculations and consequence models for all covered processes. To ensure that the local jurisdiction's latest regulatory requirements were addressed, RISK, Inc.'s staff obtained a recent update to the local guidelines and audited the existing program against those elements.

**The Result:**

The Federal RMP updates were submitted to EPA within the deadline. The submittal document to the local agency was successfully filed to satisfy additional state and local requirements. For the sites with available personnel we prepared a submittal report summarizing RMP information that the site personnel used to input into the RMP eSubmit program.

For the site with limited personnel, the project close-out consisted of organizing all back-up documentation and creating a job aid. The site now has documentation to make subsequent updates faster, easier and better than before, including:

- 1) a documented work process and guidelines to lead them through the next update (job aid) as well as guidance for processes they may add; and
- 2) complete back-up and calculation basis documentation in an updatable and formalized format.