

# RMP Emergency Planning and Response Exercises



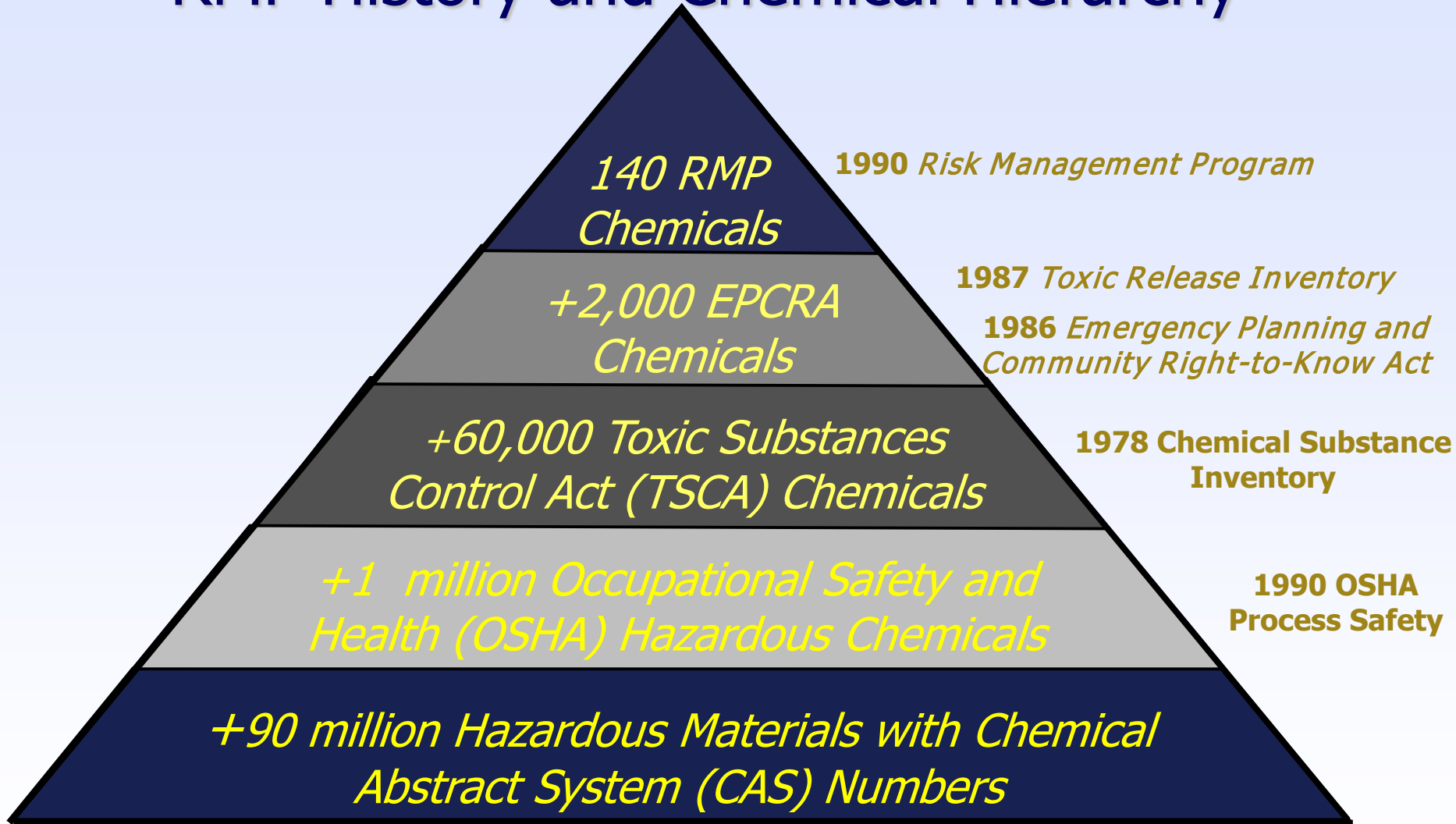
Sarah Robison

RMP Coordinator

North Carolina Division of Emergency  
Management



# RMP History and Chemical Hierarchy



# Threshold Quantity (TQ)

**As listed in §68.130  
as specified in  
§68.115:**

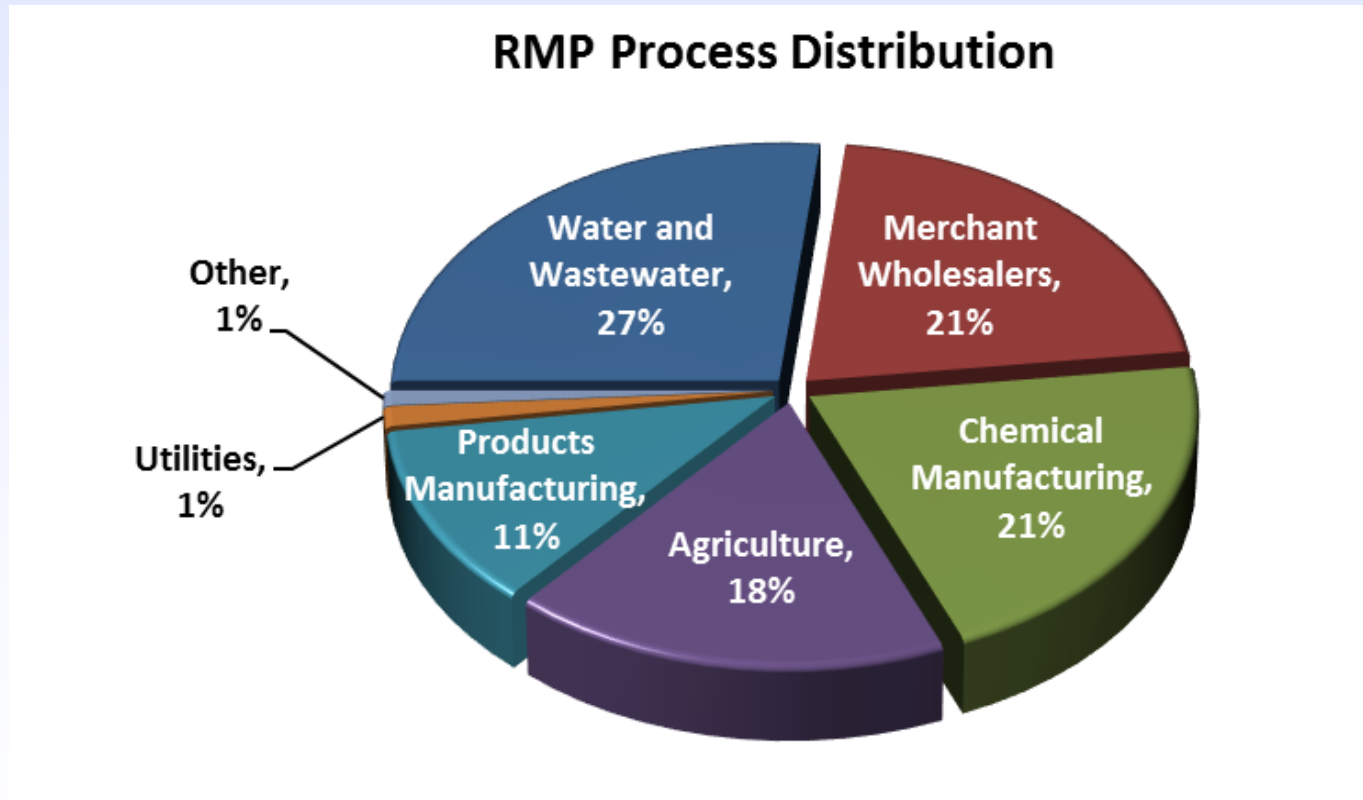
**The greater the  
hazard the lower  
the TQ**

**77 Toxic chemicals  
63 Flammables**

**112(r) Regulated Substances  
Toxics List**

Chemical Name	CAS No.	TQ (lbs)
Acrolein .....	107-02-8	5,000
Acrylonitrile .....	107-13-1	20,000
Acrylyl chloride .....	814-68-6	5,000
Allyl alcohol .....	107-18-6	15,000
Allylamine .....	107-11-9	10,000
Ammonia (anhydrous).....	7664-41-7	10,000
Ammonia (conc 20% or greater) .....	7664-41-7	20,000
Arsenous trichloride .....	7784-34-1	15,000
Arsine .....	7784-42-1	1,000
Boron trichloride .....	10294-34-5	5,000
Boron trifluoride .....	7637-07-2	5,000
Boron trifluoride .....	353-42-4	15,000
compound with methylether (1:1)		
Bromine.....	7726-95-6	10,000
Carbon disulfide .....	75-15-0	20,000
Chlorine.....	7782-50-5	2,500
Chlorine dioxide .....	10049-04-4	1,000
Chloroform .....	67-66-3	20,000
Chloromethyl ether .....	542-88-1	1,000
Chloromethyl methyl ether .....	107-30-2	5,000
Crotonaldehyde .....	4170-30-3	20,000
Crotonaldehyde (E).....	123-73-9	20,000
Cyanogen chloride .....	506-77-4	10,000
Cyclohexylamine .....	108-91-8	15,000
Diborane.....	19287-45-7	2,500
Dimethyldichlorosilane .....	75-78-5	5,000
1,1-Dimethylhydrazine .....	57-14-7	15,000

# BREAKDOWN OF RMP FACILITIES IN NORTH CAROLINA (280 FACILITIES)





# RMP Incident Trends

## RMP 10-Year Accident History (EPA 2017):

- 90% Facilities have no accidents
- 6% have 1 accident
- 2% have 2+ accidents
- 1/2 reportable accidents are from less than 2% of RMP facilities nationwide



ConAgra National Gas Explosion and Ammonia Release, June 2009  
Garner, NC

## *Preventing Incidents - Better Than Responding*

# December 19, 2019 RMP Reconsideration Final Rule Compliance

Activity to Complete	Due Date
<b>Develop Emergency Response Program</b> - Chemical, Quantity, Resource and Capabilities	Within three years of owner or operator determining that facility is subject to the provisions
<b>Annual Coordination Requirements</b> -Updates to Community ERP	Facilities shall coordinate response needs with local emergency planning and response organizations annually and more frequently if necessary.
<b>Develop exercise plans and schedules –</b> facility ER staff, contractors	<b>December 19, 2023</b> Frequency determined by coordination with facility and local emergency response officials
<b>Conduct first annual notification exercise</b>	<b>December 19, 2024</b> Notification exercises. At least once each calendar year, the owner or operator of a facility with any Program 2 or Program 3 process shall conduct an exercise of the facility’s emergency response notification mechanisms
<b>Conduct first field exercise</b> -simulated accidental release	According to the exercise schedule established by the owner or operator in coordination with local response agencies
<b>Conduct first tabletop exercise</b> -simulated accidental release	<b>December 21, 2026</b> Frequency at minimum every 3 years



# Emergency Response Coordination

## What Must Facilities Provide?

Provide the local emergency planning and response organizations:

- The facility emergency response plan or emergency action plan;
- Updated emergency contact information; and
- Other information necessary for developing and implementing the local emergency response plan
- Responding Facilities (own hazmat team) – Establishing schedules and plans for field and tabletop exercises

# RMP Reports and Emergency Response

- Available in E-Plan
- Under Facility Search select RMP (by EPA)

## Search Functions

### Facility Search

**Filing Type**

Submission TAB

Tier2

TRI

Emergency Plan


RMP (by Tier2 User)

RMP (by EPA)

Facility Information	Contact Information	Chemical Inventory EPCRA 304 Report	Additional Information**	StateFields
----------------------	---------------------	-------------------------------------	--------------------------	-------------

## Facility Documents

- I have submitted a site plan.
- I have attached a description of dikes and other safeguard measures.
- I have attached a list of site coordinate abbreviations.

File Name	File Category	Description	Upload Date or Index	Download
100000228336.pdf	RMPDoc	RMP Report for epa_facilityid= 100000228336	1415065	



# RMP Report ER Information

- RMP Reports nine sections, ER information in:
- **Section 1:** LEPC, Process Chemical description, type of facility
- **Section 2-5:** Worst and Alternative Case for Toxics and Flammables includes modeling information and description of public impacts
- **Section 6:** Accident history description
- **Section 9:** Emergency Response capabilities
- **Executive Summary:** May include description of the chemical process, emergency response capabilities, etc.

# RMP Response Status: Is it Correct?

- Many facilities indicate yes to having emergency response plans
- When reviewing plans is the facility actually equipped to respond to the chemical release?

## —Written Emergency Response (ER) Plan—

Community Plan (Is facility included in written community emergency response plan?):

Facility Plan (Does facility have its own written emergency response plan?):

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Healthcare (Does facility's ER plan include information on emergency health care?):

## —Emergency Response Review—

Review Date (Date of most recent review or update of facility's ER plan):

## —Emergency Response Training—

Training Date (Date of the most recent ER training for facility's employees):

# Utilizing E-Plan for Responses

## Tier II Submittals

- Annual Tier II submittals may include planning tools
- Emergency plans, facility maps with hazmat location, water supply and safe zones, chemical mitigation descriptions, ER equipment, process diagrams and SDSs
- Local responders and LEPCs may request facilities to upload documents in E-Plan

Chemical Inventory EPCRA 304 Report

Additional Information

### Facility Documents

No uploaded document

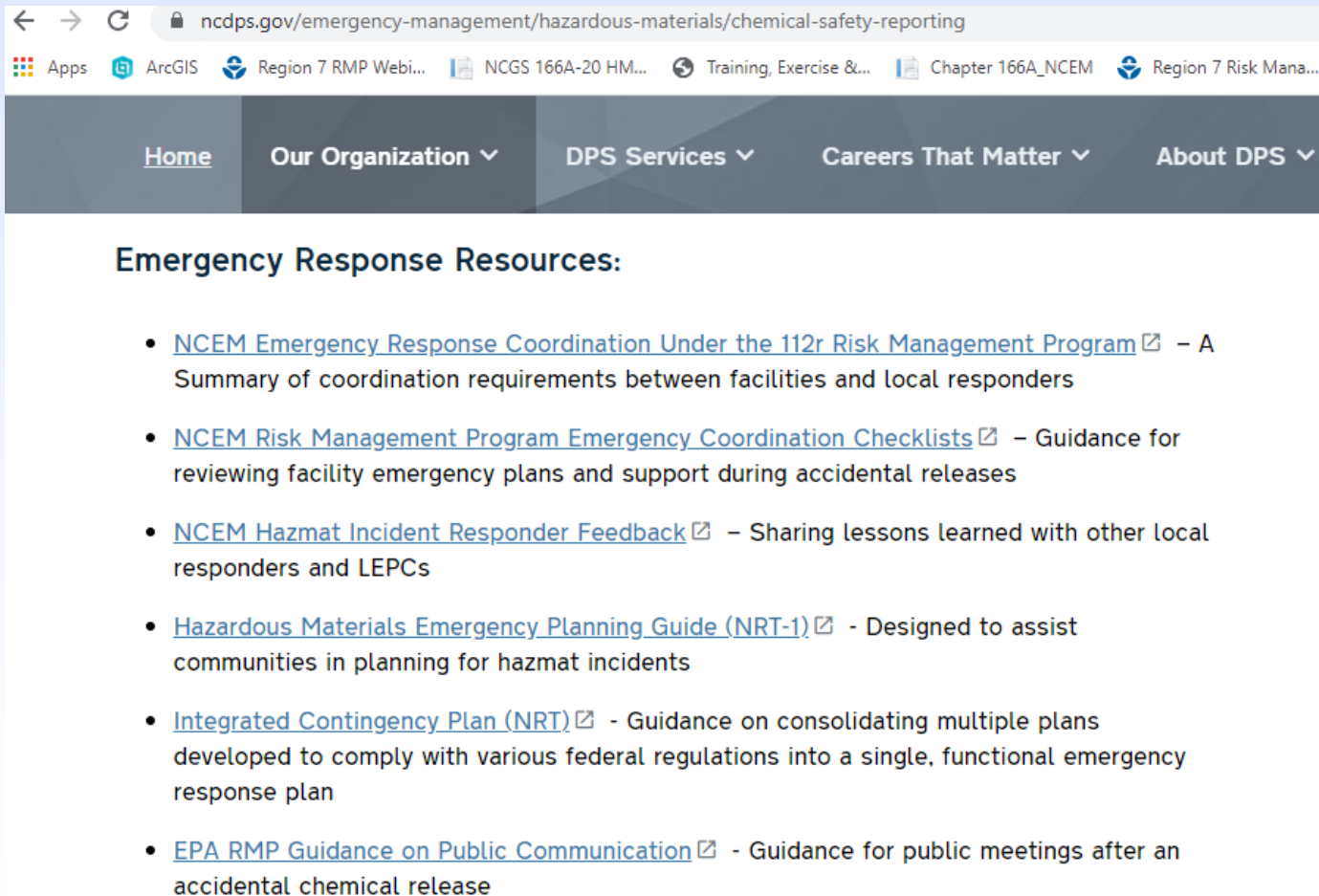
### Emergency Plan

No uploaded document

### Hazard Analysis

No uploaded document

# Emergency Response Plan Guidance



The screenshot shows a web browser window with the URL [ncdps.gov/emergency-management/hazardous-materials/chemical-safety-reporting](https://ncdps.gov/emergency-management/hazardous-materials/chemical-safety-reporting). The browser's address bar and tabs are visible. Below the browser window is a navigation menu with the following items: Home, Our Organization, DPS Services, Careers That Matter, and About DPS. The main content area is titled "Emergency Response Resources:" and contains a list of six links, each with an external link icon:

- [NCEM Emergency Response Coordination Under the 112r Risk Management Program](#) - A Summary of coordination requirements between facilities and local responders
- [NCEM Risk Management Program Emergency Coordination Checklists](#) - Guidance for reviewing facility emergency plans and support during accidental releases
- [NCEM Hazmat Incident Responder Feedback](#) - Sharing lessons learned with other local responders and LEPCs
- [Hazardous Materials Emergency Planning Guide \(NRT-1\)](#) - Designed to assist communities in planning for hazmat incidents
- [Integrated Contingency Plan \(NRT\)](#) - Guidance on consolidating multiple plans developed to comply with various federal regulations into a single, functional emergency response plan
- [EPA RMP Guidance on Public Communication](#) - Guidance for public meetings after an accidental chemical release

# POC's for HAZMAT, Tier II or RMP Questions

Sarah Robison

Hazardous Materials Coordinator-RMP

Josh Langdon

Hazardous Materials Coordinator-Tier II

Cole Owen

Assistant State Hazardous Materials Manager

*EMAIL:*

[HAZMAT@NCDPS.gov](mailto:HAZMAT@NCDPS.gov)

## POC for Regulatory Compliance Questions

Mike Reid

112(r) Program

Coordinator NC DAQ

919-707-8443

*EMAIL:*

[mike.reid@ncdenr.gov](mailto:mike.reid@ncdenr.gov)