

---

## **Illinois Fertilizer & Chemical Association**

---

P.O. Box 1326, Bloomington, Illinois 61702-1326 • Telephone: 309.827.2774 • Fax: 309.827.2779 • www.ifca.com

### **RISK MANAGEMENT PROGRAM GUIDANCE FOR AG RETAIL FACILITIES**

New for this year's RMP update is the option to submit electronically to USEPA rather than mailing a computer disk with the information. IFCA encourages using the on-line RMP eSubmit computer program for submission because once you create a username and password to access the site, your RMP information will be readily available. Our industry is in store for some strict regulatory compliance and expensive fines for non-compliance with federal regulatory requirements such as the RMP.

Filing of the RMP with USEPA only satisfies a portion of the requirements in order to be in compliance with this regulation. The RMP audits in 2004 and 2005 were just a preview of things to come within the next few years. USEPA emphasizes that you must maintain a copy of the Risk Management Plan along with the Risk Management Program and it must be kept on file at **each** anhydrous ammonia storage location. If the NH<sub>3</sub> storage facility is two miles from the main office, the RMP must be kept on file at the storage facility, not the main office.

#### **Required Elements of RMP & Justifying Your Data**

In order for a facility to accurately enter data into the RMP program, it is essential to have in place a Risk Management Program at each anhydrous ammonia storage location. The risk management program helps define and gather certain data that will be entered into the risk management plan database. Most importantly, the person responsible for completing the RMP at the facility must be able to explain and defend to USEPA how you came up with the information in your RMP. Failure to do so can result in substantial penalty. For example:

1. Population estimates, worst case and alternate case scenarios, amount of product stored, equipment maintenance & inspection, employee training, emergency response information, equipment failure, and natural disaster information must all be gathered and used to help enter data in the RMP computer program.
2. How did you come up with the worse case scenario or alternate case scenario and determine the distance to endpoint an anhydrous ammonia cloud will travel based on computer modules? Did you use a computer program called RMP COMP or did you use the DEGADIS model developed by The Fertilizer Institute (TFI)? How did you determine the population to be impacted by an anhydrous ammonia release? Did you use a plat book, conduct your own door to door census or did you use Land View V, a program developed to accurately determine populations within a designated radius using the 2000 U.S. Census Bureau information? IFCA recommends using Land View V.
3. How did you determine the latitude and longitude of your facility?
4. Does your facility have a current maintenance manual? A maintenance manual consists of equipment specifications for each piece of equipment used in the transfer and storage of anhydrous ammonia. The average maintenance or mechanical integrity manual is about 200-300 pages.
5. Does your company have standard operating procedures (SOP's) for NH<sub>3</sub> transfer, start up and emergency shutdown? Have you reviewed your standard operating procedures with your employees and documented the review?
6. Have your employees that transfer, transport or work around NH<sub>3</sub> received proper training certified as a competent attendant as well as being trained in proper emergency response procedures?
7. As part of the Risk Management Program, each ammonia facility is required to complete a Hazard Review once every five years. If you submitted your RMP for the first time in June of 1999, then you should have completed a total of three hazard reviews.
8. As part of the Risk Management Program, each ammonia facility is required to complete a Compliance Audit once every three years. If you submitted your RMP in June of 1999, then you should have completed a total of three compliance audits.
9. Is there a chain of command in place for who is responsible for the Risk Management Program? This can be one person or possibly three or four different people?