

The background of the slide is a photograph of an industrial facility, possibly a refinery or chemical plant, featuring large storage tanks, distillation columns, and piping. The scene is captured during the "blue hour" of twilight, with a soft, dim light. A semi-transparent white rectangular box is overlaid on the center of the image, containing the text "To learn from past problems...".

Five-Year Accident History

To learn from past problems...



Overview

- The 5-year accident history covers certain releases
 - The release must be from a **covered process** and involve a **regulated substance** held above its threshold quantity in the process
 - The release must have caused at least one of the on-site or offsite effects shown in the following table (40 CFR 68.42(a))

On-site	Off-site
✓ Deaths	✓ Deaths
✓ Injuries	✓ Injuries
✓ Significant property damage	✓ Evacuations
	✓ Sheltering in place
	✓ Property damage
	✓ Environmental damage



Five-Year Accident History



- Report only accidents involving listed substances
 - ▣ If a person falls off a walkway due to a spill, it counts
- No reportable quantity (RQ)
 - ▣ If release causes items mentioned on previous slide, it must be reported



Required Data

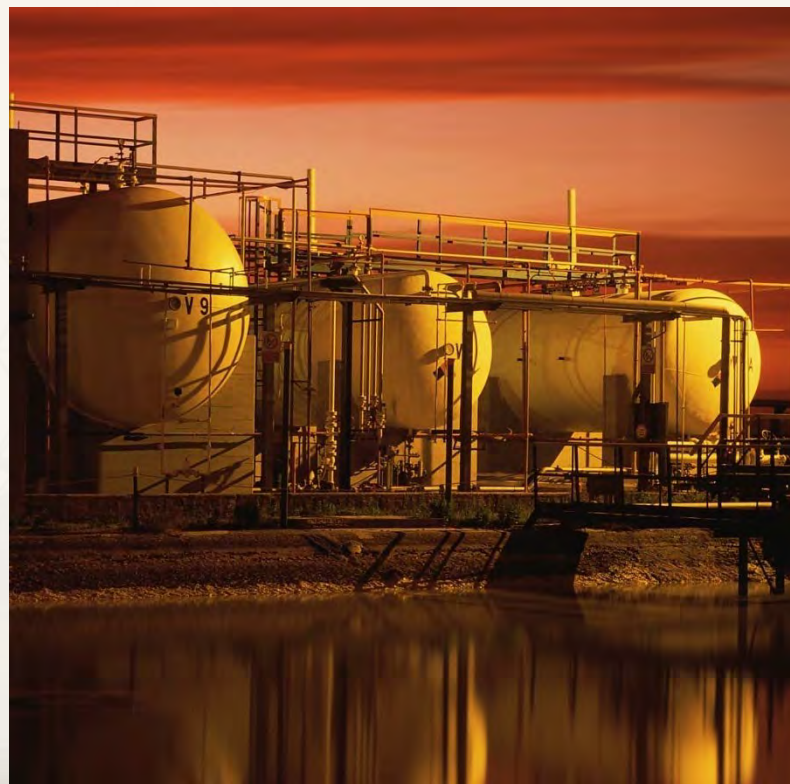
- Required data includes
 - Date
 - Time
 - Release duration
 - Chemical(s)
 - Quantity released
 - Release event
 - Gas release
 - Liquid spill/evaporation
 - Fire
 - Explosion
 - Uncontrolled/runaway reaction





Required Data

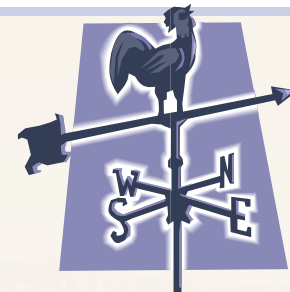
- Release source
 - Storage vessel
 - Piping
 - Process vessel
 - Transfer hose
 - Valve
 - Pump
 - Joint
 - Other





Required Data

- Weather conditions
 - Wind speed and direction
 - Temperature
 - Stability class
 - Precipitation present
 - Unknown





Required Data

- On-site impacts
- Known offsite impacts
- Initiating event
- Contributing factors
- Whether offsite responders were notified
- Changes introduced as a result of the accident





Required Information—RMP Executive Summary

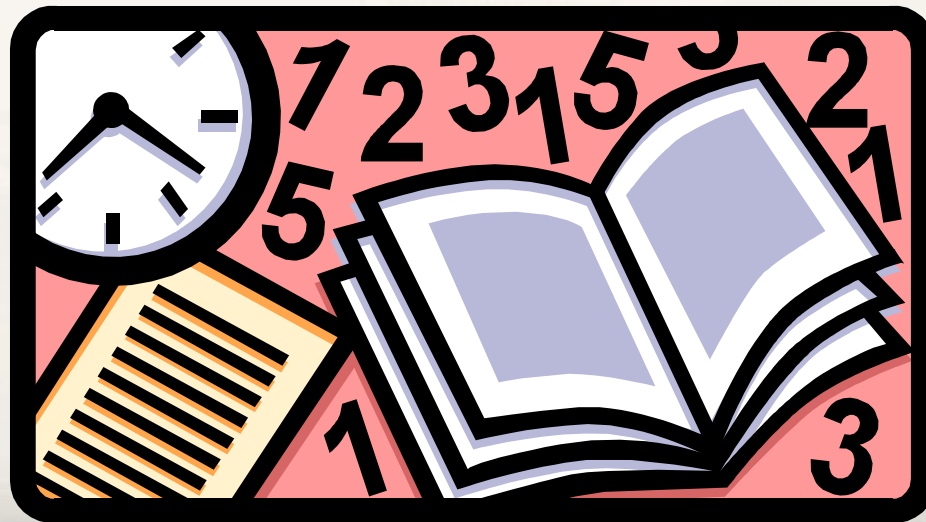
- Brief description of the five-year accident history (40 CFR 68.155(d))





Timeframe Requirements for Reporting

- When an RMP is first submitted
- When an RMP is updated
- Within 6 months of an accident





Common Deficiencies

- Failure to report
 - Accidents with amounts below the CERCLA/EPCRA RQs
 - Triggers that require reporting (in accident history)
 - Accidents requiring more than first aid (when person was sent to a hospital just for “observation” or “preventative medicine”)
 - Offsite data (“do not know accurate number”)



Common Deficiencies

- Failure to update the RMP within 6 months to include
 - ▣ An updated brief description in the executive summary
 - ▣ Section 6 information



Additional Thoughts

- Not all accidents in Section 6 may trigger an incident investigation (and vice versa)
- If an accident occurs which changes the program level from 1 to 2 or 3, facility has 6 months to establish the new program level and resubmit the RMP
- Consider adding EPCRA/CERCLA reportable events to the RMP executive summary