



RETA Ohio General Meeting Minutes

August 9, 2013

In Attendance:

Chris Cost

Doug Staker

Chad Rader

Scott Price

Chuck Black

Ed Fritsch

Dale Stewart

John Pilkington

Tim Burton

Jeff Sutton

General Meeting Notes:

No bank account yet – national waiting to fund us – Need a Treasurer. Need to review Ohio & At Large List and request transfers.

Presenters: Chuck Black, Nestle PTC & Tim Burton, Sutton & Associates

Topics: PHA Overview & RMP Filing Review

Technical Meeting:

First Topic: PHA Overview

3 Types:

- **What If**
- **What If – Checklist**
- **Hazwhopper – Utilized by Petrochem**

By Chuck Black, Nestle PTC

Meeting Notes:

PHAs must be outsourced to a 3rd party. Nestle works with a knowledgeable PHA auditor. “What If – Checklist” – type we always use. Is considered to be an industry standard.

PHA Team – facility personnel and an outside consultant are able to take a fresh look at things. They see things that we walk by every day.

Do not avoid completing recommendations if the same recommendation is made by two audits in a row 0 that is a wilful violation.

Some safety controls may be good – review again to see if going one step further is a good idea.

“Double Jeopardy” our interpretation is making a remedy may stop a problem from happening this way but it may also...

How do you handle operator error? Take a realistic point of view on how your team of operators could benefit from installed safeguards to make them customized.

Consequences “what if” questions should also include any previous incidents that have occurred at the facility or similar facilities so that preventative solutions can be considered.

Study work sheets – one resolution for a recommended action items is lack of data. Lack of data is not well received during EPA audits.

SOLs have to include consequences of deviations. Now you need another column that tells the operator corrective actions to consequences of deviation.

(Need to send Chuck a thank you letter)

Second Topic:

RMP

By Tim Burton, Project Manager at Sutton & Associates

Meeting Notes:

RMP

- Is based on “on-site” and “off-site”
- Is your facility stationary – yes
- Does your facility contain a regulated substance – NH3 is regulated, yes
- Do you have threshold quantity – 10,000 lbs or more

PSM

- Do you have chemical
- Do you have threshold
 - Then yes, you need PSM

RMP

- Program 1 – easiest due to rural location – accident free
- Program 2 – middle ground – rare
- Program 3 – most of us – most strict.

See flow chart

WCS – normal operating level of HPR over ten minutes release. The endpoint for NH3 is 200ppm after the release has traveled downwind per standard data.

2009 RMP e-submit

For off-site consequences

- Does Ohio EPA recommend Marplot vs Aloha vs ?
- Do they prefer any?

See updates – corrections and deregistrations chart.

WCS is HPR

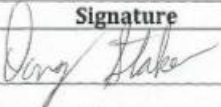

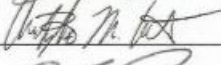
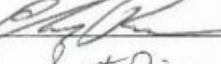
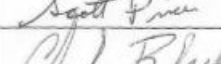

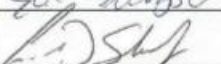
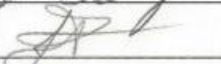
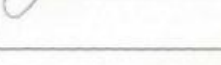
EPA would like alternative release scenario. Carry the endpoint to offsite.

Executive Summary is lengthy and often holds outdated information due to least amount of updates.

Everybody's RMP is available online rtk.

Homeland Security looks at info on RMP to classify. Have you filed CFATS?

Sign-in Sheet
RETA Ohio General Meeting
August 9, 2013

	Name	Signature	Company	Phone	Email
1.	Doug Staker		New Bakery Co.	819-5930 ext 11	DougStaker@NewBakeryCo.com
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8.	DALE STEWART		NEW BAKERY CO.	740 588-5863	DALE_STEWART@NEWBAKERYCO.COM
9.	John Pilkington		Sutton	512 8575	
10.					
11.					
12.					
13.					