

Planning for 2019



Happy New Year!

As we begin the first full week of 2019, many of you will be planning for the year to come. Below are some key items to consider when planning for the year ahead.

Tier II Submittals

Tier II submittals for 2018 are due by March 1st, 2019. You should have received a reminder email from the state regarding the updated software and requirements for the submittal. If you haven't received such an email, you can find the [state reporting requirements](#) on EPA's website. Make sure to review the requirements for submitting to the State Emergency Response Commission (SERC), Local Emergency Preparedness Committee (LEPC), and the local fire department. Also ensure to prepare the chemical inventory, the current Safety Data Sheets, and site map showing the locations of the chemicals (as necessary).

Note: Facilities located in California satisfy the Tier II requirement through the Hazardous Materials Business Plan (HMBP) Program. The HMBP is submitted to the local regulating agency, the Certified Unified Program Agency (CUPA). This submittal is made electronically through the California Environmental Reporting System (CERS) or the local portal managed by the CUPA. In addition to the chemical inventory and site maps, the HMBP must include information on your facility's emergency plan and training program. Ensure to verify the deadline for submitting the HMBP as some CUPA's require the submittals on a schedule different from the March 1st federal Tier II deadline.

PSM and RMP Compliance

First and foremost, verify the due dates of your Five Year Revalidation and Three Year Compliance Audits. If they are due within 2019 and the proper arrangements are not already underway, begin planning now. Review scheduling and ensure you will have the necessary resources (internal and if necessary external) available.

In addition, review the regularly occurring items within your program:

- Planned changes or expansions.
- Training records.
- Contractor documentation.
- Regular preventative maintenance and five year mechanical integrity inspections.
- Operating procedures review and annual certification.
- Evacuation drills and coordinating with emergency responders.
- Review of Emergency Action Plan / Emergency Response Plan.
- Status of recommendations from previous audits, PHA's, etc.

[California Office](#)
27525 Puerta Real, Suite 100-468
Mission Viejo, CA 92691

Phone/Fax: (949) 207-3397
www.psmrmpsolutions.com

[Washington Office](#)
16625 Redmond Way, Suite M5
Redmond, WA 98052

Planning for 2019



We at PSM RMP Solutions strive to keep you informed of what is happening within the industry through our continued involvement with IIAR and RETA, as well as participation in chemical safety days throughout the year. We will continue to keep you informed of regulatory updates and changes as they become effective. Should you have any questions please feel free to reach out to us. We wish you all a safe and successful 2019.

California Office
27525 Puerta Real, Suite 100-468
Mission Viejo, CA 92691

Phone/Fax: (949) 207-3397
www.psmrmpsolutions.com

Washington Office
16625 Redmond Way, Suite M5
Redmond, WA 98052