

Year in Review



To stay abreast of industry and regulatory issues, we at PSM RMP Solutions continually look for opportunities to learn firsthand. Throughout this first half of the year we have been both sponsoring and attending various events throughout the west coast:

- ◆ January, Seattle/Tacoma Chemical Safety Day
- ◆ February, Central Valley Chemical Safety Day
- ◆ March, Las Vegas Chemical Safety Day
- ◆ March, International Institute of Ammonia Refrigeration Conference
- ◆ April, RETA LA/IE Ammonia Safety Day
- ◆ May, Salinas Valley Safety Day

Additionally, we have participated in several speaking engagements to help end users stay informed of regulatory changes and pass on our knowledge and experience with audits and inspections. We also have several more planned for the second half of the year.

- ◆ February, RETA Monterey Bay Chapter Monthly Meeting
- ◆ February, RETA Monterey Bay Chapter Workshop
- ◆ May, Fresno County CalARP Training

In order to support and lead within the ammonia refrigeration industry, each of us are volunteering our time and effort:

- ◆ IIAR Compliance Guidelines Committee, program development
- ◆ IIAR Standards Committee, member participation
- ◆ RETA National Education Committee, PSM Guidance Document Re-Write
- ◆ RETA Inland Empire Chapter, Los Angeles Chapter, and Puget Sound Chapter Board Members

Recently, our team member, Jeanna Emmons, attended a public hearing on EPA's Proposed RMP Reconsideration Rule. The hearing was held on June 14, 2018, at EPA's headquarters in Washington DC. In general, the Reconsideration Rule seeks to rescind and modify several sections of the Final RMP Amendments Rule (published back in January 2017) before it becomes effective in February 2019. The purpose of the hearing was to provide interested parties the opportunity to present data, views, or arguments concerning the proposed rule.

The hearing consisted of those representing industry and fence line communities. There were approximately 50 pre-registered speakers, and several additional speakers registered onsite on the day of the hearing.

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The speakers spoke to a revolving panel consisting of four EPA personnel. Three of the four panel members were a combination of EPA scientists, chemical engineers, and/or personnel from the Office of Emergency Management. The fourth panel member was the general counsel for the EPA. The speakers were given five minutes to present their arguments. The panel asked explanatory questions if needed, however, a debate on facts was not the intent of the meeting.

In summary, industry overwhelmingly supported the EPA's proposal to rescind several items within the RMP Amendments Rule, including third party audits. On the other hand, those representing fence line communities were against any changes that would soften the regulatory burden on industry.

For those interested, there is still time to submit comments, please visit [regulations.gov](https://www.regulations.gov). Public comments must be submitted on or before July 30, 2018. For additional information on the Proposed RMP Reconsideration Rule, see [EPA's website](#).

All arguments, comments, and supporting data submitted online or presented at the public hearing will be reviewed and evaluated by EPA after the comment period closes. EPA may make additional changes to the proposed rule based on the information received. We will keep you updated as EPA works towards publishing the final rule.

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