



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
25063 CENTER RIDGE ROAD
WESTLAKE, OHIO 44145**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
NASA Glenn Research Center – Plum Brook Station, Sandusky, Ohio

FROM: Danny Nguyen, Risk Management Program (RMP) Inspector
WECAB, Multimedia Section

THRU: Mr. Brooke Furio, Section Supervisor
WECAB, Multimedia Section

TO: File

BASIC INFORMATION

Facility Name: NASA Glenn Research Center – Plum Brook Station

Facility Location: 6100 Columbus Avenue, Sandusky, Ohio, 44870

Date of Inspection: August 8, 2023

EPA Inspector(s):

1. Danny Nguyen, RMP Inspector, USEPA Region 5

Other Attendees:

1. Dawn Trovato, RMP Inspector, Ohio EPA
2. Justin Parrett, RMP Inspector-In-Training, Ohio EPA
3. Christie Myers, Environmental Management Office Chief, NASA
4. Lisa Ramsey, Environmental Programs Manager, NASA
5. Stanley Tam, Waste Water Program Manager, NASA
6. Allen Turner, Emergency Response Coordinator, NASA
7. Eric Vinborg, Emergency Response Coordinator, NASA
8. Aaron Walker, NASA
9. Paul Petro, Waste Management, Leidos

Contact Email Address: christie.myers@nasa.gov

Purpose of Inspection: Compliance with the prevention of accidental release provisions found in Section 112(r) of the Clean Air Act (CAA), 42 U.S.C. §§7414(r)

Facility Name: NASA Glen Research Center, Plum Brook Station
Facility Location: 6100 Columbus Avenue, Sandusky, Ohio, 44870
Date of Inspection: August 8, 2023

Facility Type: Aeronautics and Space Research and Technology

Regulations Central to Inspection: The Chemical Accident Prevention Provisions at 40 C.F.R. Part 68

Arrival Time: 9:00 AM (August 8, 2023)

Departure Time: 4:10 PM (August 8, 2023)

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from NASA Glen Research Center (GRC) – Plum Brook Station’s (PBS’s) representatives unless otherwise noted.

Process Description:

NASA GRC – PBS (official name is now NASA GRC – Neil Armstrong Test Facility (ATF)) is a remote campus of the Glenn Research Center. Situated on 6,700 acres in Sandusky, Ohio, it is home to some of the world’s largest and most capable space simulation test facilities, where ground tests are conducted for the U.S. and international space and aeronautics communities (information obtained via public website).

NASA GRC – ATF’s Risk Management Program (RMP) process is in the In-Space Propulsion Facility (ISP) facility, formerly known as the Spacecraft Propulsion Research Facility (B–2). The ISP is the world’s only facility capable of testing full-scale upper stage launch vehicles and rocket engines under simulated space conditions and conducting altitude hot fire. The engine or vehicle can be exposed for indefinite periods to low ambient pressures, low-background temperatures, and dynamic solar heating, simulating the environment the hardware will encounter during orbital or interplanetary travel (information obtained via public website).

The RMP process chemical used to support testing of launch vehicles in the ISP is liquid hydrogen. Storage and use of hydrogen is based on NASA’s test schedule and would only be stored on-site to support active test. The hydrogen would be brought in via tanker truck to the outside 33,300-gallon storage tank V-203. The liquid hydrogen is then piped into the ISP to

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support testing. In the ISP testbed, there is an additional 15,600 dump tank (V-201) that can store and collect excess liquid hydrogen from launch vehicle tests. However, due to NASA's launch vehicle testing schedule, hydrogen has not been stored on-site since February 2020. The next proposed test with the use of hydrogen would be in 2026.

NASA GRC – ATF reports as a Program Level 1 process.

Data Collected and Observations:

The following observations were made during the records review process:

Off Site Consequence Analysis (OCA):

- The amount released for the worst case analysis was reported in the RMP submittal as 30,600 (supposed to be reported in pounds) which does not match the amount of 19,500 (in pounds) used in the RMP Comp calculation of the distance to endpoint.
- The distance to end point did not use a data source with most updated information to estimate population, public receptors, and environmental receptors affected.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

Tour observations:

- Hydrogen piping from the outside hydrogen storage tank (V-203) into the ISP building did not have identification of chemical contents and direction of flow.

RECORDS REVIEW

The following records were provided by the Facility representatives electronically to USEPA prior to the inspection and are filed on a secure One Drive folder provided by EPA Inspector Danny Nguyen under the folder "NASA Plum Brook Station":

RMP_Comp_US EPA.pdf
Erie 2019 Evaluations.pdf
Local Emergency Planning Committee Members.docx
Erie Concurrence 2019 objs 2, 3, 8, 11.pdf
5.22.19_Exercise LEPC & NASA.pptx
Enclosure7_ReferenceStandards_StoringHydrogen.pdf
Enclosure6_Photos_HydrogenSystemGauges.pdf

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Enclosure5_Photos_ConcretePiersRepairs_HydrogenDewar.pdf
Enclosure4_Letter_DescriptionOfStructuralInspection.pdf
Enclosure3_SikaQuick1000_ProductDataSheet.pdf
Enclosure2_Sikadur52_ProductDataSheet.pdf
Enclosure1_StatementOfWork_V203HydrogenDewar_CrackRepair.pdf
letter_Virtual CAA Section 112(r) RMP Inspection of the ISP Hydrogen System.pdf

The following records were provided by the Facility representatives electronically to USEPA after the inspection and are filed on a secure One Drive folder provided by EPA Inspector Danny Nguyen under the folder “NASA Plum Brook Station\8 Aug 2023 On-Site Inspection”:

CRT-09-0573 Rev. 9-29-22.pdf
CRT-11-0754 Rev. 11-18-21.pdf
DW0087 (V-201).pdf
DW0142 (V-203).pdf
HydrogenLabel1.JPG
HydrogenLabel2.jpeg
HydrogenLabel3.jpeg
HydrogenLabel4.JPG
LEPC Agenda 08.16.23.docx
NASA .3 mile.png
NASA Building Descriptions.docx
RAC-09-0573 Rev. 09-29-22.pdf
RAC-11-0754 (B2 V-203 Dewar).pdf
GRC-ATF RCRA Plan return receipts of certified - page 1.pdf
GRC-ATF RCRA Plan return receipts of certified - page 2.pdf
NASA GRC-ATF RCRA ICP to Regulators.docx
Sign in Sheet 08.16.23 - LEPC.pdf

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Concerns:

- All observations identified above in the records review section.
- Hydrogen piping from the outside hydrogen storage tank (V-203) into the ISP building did not have identification of chemical contents and direction of flow.

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Post Inspection Communication:

- 8/8/23 Email: Ms. Lisa Ramsey provided exercise presentation with NASA and the LEPC in May 2019.
- 8/17/23 Email: Ms. Lisa Ramsey provided engineering certification documentation on the outside hydrogen storage tank (V-203).
- 8/17/23 Email: Ms. Lisa Ramsey provided documentation on the V-203 and V-201 storage tanks.
- 8/22/23 Email: Ms. Lisa Ramsey provided photograph of MARPLOT for the OCA.
- 8/23/23 Email: Ms. Lisa Ramsey provided coordination documentation of the August 16, 2023 meeting with the Erie LEPC.
- 8/31/23 Email: Ms. Lisa Ramsey provided photographs of new labels placed on the hydrogen pipes into the ISP.

DIGITAL SIGNATURES

Report Author: DANNY NGUYEN Digitally signed by DANNY NGUYEN
Date: 2023.10.05 15:13:49 -04'00'

Section Supervisor: BROOKE FURIO Digitally signed by BROOKE FURIO
Date: 2023.10.05 15:59:09 -04'00'

Appendices and Attachments

1. Appendix A: Photo Log

Facility Name: NASA Glen Research Center, Plum Brook Station
Facility Location: 6100 Columbus Avenue, Sandusky, Ohio, 44870
Date of Inspection: August 8, 2023

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Danny Nguyen	2. Archival Record Location: <i>OneDrive/Desktop/Multi Media Section/112(r)/Inspections/JCI Jones Inc/Photos</i>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	DSCN0438.JPG	8/8/23 11:17 AM Eastern	Overview of V-203 Outside Hydrogen Storage Tank
2	DSCN0439.JPG	8/8/23 11:36 AM Eastern	Overview of Testing Chamber in ISP
3	DSCN0440.JPG	8/8/23 11:36 AM Eastern	Overview of Testing Chamber in ISP

RMP Program Level 1 Process Checklist

General Facility Information

Facility Name:	NASA Glenn Research Center (GRC)-Neil A. Armstrong Test Facility (ATF)- Plum Brook Station (PBS)		
Mailing Address (Street, City, State, Zip):	21000 Brookpark Road, Cleveland, Ohio, 44135		
Physical Address (Street, City, State, Zip):	6100 Columbus Avenue, Sandusky, Ohio, 44870		
Latitude/Longitude: (Source)	41.359167; -82.641667		
County:	Erie		
RMP Number/ FRS Number:	1000 0024 1348		
Facility Contact (Name, Title):	Ms. Christie Myers, Environmental Management Office Chief, NASA		
Facility Contact Phone No:	(216) 433-8874	Facility Contact Email:	christie.myers@nasa.gov
Reported NAICS Code(s):	92711 Space Research and Technology		

Inspection Information

Inspection Begin Date:	August 8, 2023	Inspection End Date:	August 8, 2023
Arrival Time:	9:00AM	Departure Time:	4:10PM
Lead Inspector	Name:	Organization:	Phone No./Email:
	Mr. Danny Nguyen	USEPA Region 5	(440) 250-1709 nguyen.danny@epa.gov
Participating Inspectors	Ms. Dawn Trovato	Ohio EPA	(614) 728-1346 dawn.trovato@epa.ohio.gov
	Mr. Justin Parrett	Ohio EPA	(937) 360-7291 justin.parrett@epa.ohio.gov

Subpart A-General [68.10-15]

General requirements followed and implemented as in 40 CFR 68.10-15?

Comments:

General: Applicability [68.10]

- | | |
|--|---|
| 1. Has the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115, complied with the requirements of this part no later than the latest of the following dates [68.10(a)]:

☐ June 21, 1999? [68.10(a)(1)];

☐ Three years after the date on which a regulated substance is first listed under §68.130? [68.10(a)(2)];

☐ The date on which a regulated substance is first present above a threshold quantity in a process? [68.10(a)(3)]; or

☐ For any revisions to this part, the effective date of the final rule that revises this part? [68.10(a)(4)] | ☒ Y ☐ N ☐ N/A |
| 2. Has the owner or operator complied with the public meeting requirement in §68.210(b) within 90 days of any RMP reportable accident at the stationary source with known offsite impacts specified in §68.42(a), that occurs after March 15, 2021? [68.10(e)] (See Item 2 of Subpart H) | ☐ Y ☐ N ☒ N/A |
| 3. <u>After December 19, 2024</u> , has the owner or operator submitted/updated a risk management plan to report a public meeting after an RMP reportable accident under §68.160(b)(21)? [68.10(f)(1)]? | ☐ Y ☐ N ☒ N/A |
| 4. For the past five years prior to the submission of a RMP, the Program 1 process(es) has not had an accidental release resulting in offsite: death, injury, or response or restoration activities for an exposure of an environmental receptor? [68.10(g)(1)] | ☒ Y ☐ N ☐ N/A |
| 5. Is nearest public receptor beyond the distance to the toxic or flammable endpoint as defined in 40 CFR 68.22(a) for the Program 1 process(es)? [68.10(g)(2)] | ☒ Y ☐ N ☐ N/A |
| 6. Have emergency response procedures been coordinated between the stationary source and local emergency planning and response organization? [68.10(g)(3)] | ☒ Y ☐ N ☐ N/A |

General: General Requirements [68.12]

- | | |
|---|---|
| 7. Has the owner or operator of a stationary source with a process eligible for Program 1: [68.12(b)]

☒ Analyzed the worst-case release scenario for the process(es), as provided in §68.25?

☒ Document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in §68.22(a)? and

☐ Submitted in the RMP the worst-case release scenario as provided in §68.165? [68.12(b)(1)] | ☒ Y ☐ N ☐ N/A |
| 8. Has the owner or operator of a stationary source with a process eligible for Program 1: [68.12(b)]

☒ Complete the five-year accident history for the process? and

☒ Submitted it in the RMP as provided in §68.168? [68.12(b)(2)] | ☒ Y ☐ N ☐ N/A |
| 9. Has the owner or operator of a stationary source with a process eligible for Program 1 ensured that response actions have been coordinated with local emergency planning and response agencies? [68.12(b)(3)] | ☒ Y ☐ N ☐ N/A |

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10. Has the owner or operator of a stationary source with a process eligible for Program 1 certified in the RMP the following: [68.12(b)]

☒ Y ☐ N ☐ N/A

“Based on the criteria in 40 CFR 68.10, the distance to the specified endpoint for the worst-case accidental release scenario for the following process(es) is less than the distance to the nearest public receptor: [list process(es)]. Within the past five years, the process(es) has (have) had no accidental release that caused offsite impacts provided in the risk management program rule (40 CFR 68.10(g)(1)). No additional measures are necessary to prevent offsite impacts from accidental releases. In the event of fire, explosion, or a release of a regulated substance from the process(es), entry within the distance to the specified endpoints may pose a danger to public emergency responders. Therefore, public emergency responders should not enter this area except as arranged with the emergency contact indicated in the RMP. The undersigned certifies that, to the best of my knowledge, information, and belief, formed after reasonable inquiry, the information submitted is true, accurate, and complete. [Signature, title, date signed].” ? [68.12(b)(4)]

General: Management [68.15]

Has the owner or operator:

11. Assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements? [68.15(b)]

☒ Y ☐ N ☐ N/A

12. Documented other persons responsible for implementing individual requirements of the risk management program and defined the lines of authority through an organization chart or similar document? [68.15(c)]

☒ Y ☐ N ☐ N/A**Subpart B-Hazard Assessment-Worst-Case Scenario [40 CFR 68.20-42]**

Does the RMP include one worst-case scenario for each Program 1 process as provided in 40 CFR 68.25?

Comments:

Hazard Assessment: Offsite consequence analysis parameters [68.22]

1. Used the following endpoints for offsite consequence analysis for a worst-case scenario: [68.22(a)]

☒ Y ☐ N ☐ N/A

☐ For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)]

☒ For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)]; or

☐ For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m² for 40 seconds? [68.22(a)(2)(ii)]

☐ For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)]

2. Used appropriate wind speeds and stability classes for the release analysis? [68.22(b)]

☒ Y ☐ N ☐ N/A

3. Used appropriate ambient temperature and humidity values for the release analysis? [68.22(c)]

☒ Y ☐ N ☐ N/A

4. Used appropriate values for the height of the release for the release analysis? [68.22(d)]

☒ Y ☐ N ☐ N/A

5. Used appropriate surface roughness values for the release analysis? [68.22(e)]

☒ Y ☐ N ☐ N/A

6. Do tables and models, used for dispersion analysis of toxic substances, appropriately account for dense or neutrally buoyant gases? [68.22(f)]

☐ Y ☐ N ☒ N/A

7. Were liquids, other than gases liquefied by refrigeration only, considered to be released at the highest daily maximum temperature, based on data for the previous three years appropriate for a stationary source, or at process temperature, whichever is higher? [68.22(g)]

☒ Y ☐ N ☐ N/A

Hazard Assessment: Worst-case release scenario analysis [68.25]

8. Has the owner or operator determined the worst-case release quantity to be the greater of the following: [68.25(b)]	☒ Y ☐ N ☐ N/A
☒ If released from a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity? [68.25(b)(1)]	
☐ If released from a pipe, the greatest amount held in the pipe, taking into account administrative controls that limit the maximum quantity? [68.25(b)(2)]	
9.a. Has the owner or operator for <u>toxic substances</u> that are <u>normally gases</u> at <u>ambient temperature</u> and handled as a <u>gas or liquid under pressure</u> :	
9.a.(1) Assumed the total quantity in the vessel or pipe would be released as a gas over 10 minutes? [68.25(c)(1)]	☐ Y ☐ N ☒ N/A
9.a.(2) Assumed that, in the absence of passive mitigation systems, the release rate would be the total quantity divided by 10? [68.25(c)(1)]	☐ Y ☐ N ☒ N/A
9.b. Has the owner or operator for <u>toxic gases</u> that are handled as <u>refrigerated liquids at ambient pressure</u> :	
9.b.(1) Assumed the substance would be released as a gas in 10 minutes, if not contained by passive mitigation systems or if the contained pool would have a depth of 1 cm or less? [68.25(c)(2)(i)]	☐ Y ☐ N ☒ N/A
9.b.(2) If released substance would be contained by passive mitigation systems in a pool with a depth > 1 cm;	☐ Y ☐ N ☒ N/A
☐ Assumed the quantity in the vessel or pipe (as determined per 68.25(b)) would be spilled instantaneously to form a liquid pool? [68.25(c)(2)(ii)]	
☐ Calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d)? [68.25(c)(2)(ii)]	
9.c. Has the owner or operator for <u>toxic substances</u> that are <u>normally liquids at ambient temperature</u> :	
9.c.(1) Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool? [68.25(d)(1)]	☐ Y ☐ N ☒ N/A
9.c.(2) Determined the surface area of the pool by assuming that the liquid spreads to 1 cm deep, if there is no passive mitigation system in place that would serve to contain the spill and limit the surface area, or if passive mitigation is in place, was the surface area of the contained liquid used to calculate the volatilization rate? [68.25(d)(1)(i)]	☐ Y ☐ N ☒ N/A
9.c.(3) Taken into account the actual surface characteristics, if the release would occur onto a surface that is not paved or smooth? [68.25(d)(1)(ii)]	☐ Y ☐ N ☒ N/A
9.c.(4) Determined the volatilization rate by accounting for the highest daily maximum temperature in the past three years, the temperature of the substance in the vessel, and the concentration of the substance if the liquid spilled is a mixture or solution? [68.25(d)(2)]	☐ Y ☐ N ☒ N/A
9.c.(5) Determined the rate of release to air from the volatilization rate of the liquid pool? [68.25(d)(3)]	☐ Y ☐ N ☒ N/A
9.c.(6) Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(d)(3)]	☐ Y ☐ N ☒ N/A
What modeling technique did the owner or operator use? [68.25(g)] <u>RMP Comp</u>	

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Facility Name: NASA Glenn Research Cent

 9.d. Has the owner or operator for flammable gases:

9.d.(1) Assumed the quantity in a vessel(s) of flammable gas held as a gas or liquid under pressure is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(1)]	☐ Y ☐ N ☒ N/A
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9.d.(2) For gas handled as refrigerated liquid that is not contained by passive mitigation systems, assumed the total quantity in a vessel(s) of refrigerated liquid is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(2)(i)]	☐ Y ☐ N ☒ N/A
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9.d.(3) For gas handled as refrigerated liquid released to a contained area, assumed the quantity volatilized in 10 minutes results in a vapor cloud? [68.25(e)(2)(ii)]	☐ Y ☐ N ☒ N/A
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9.d.(3) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(e)]	☐ Y ☐ N ☒ N/A
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 9.e. Has the owner or operator for flammable liquids:

9.e.(1) Assumed the entire quantity in the vessel or pipe, taking into account administrative controls that limit the maximum quantity, would be spilled instantaneously to form a liquid pool? [68.25(f)(1)]	☒ Y ☐ N ☐ N/A
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9.e.(2) For liquids at temperatures below their atmospheric boiling point, calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d) and assumed that the quantity which becomes vapor in the first 10 minutes is involved in the vapor cloud explosion? [68.25(f)(1)-(2)]	☒ Y ☐ N ☐ N/A
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9.e.(3) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(f)]	☒ Y ☐ N ☐ N/A
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10. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.25(g)]	☒ Y ☐ N ☐ N/A
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11. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(g)]	☒ Y ☐ N ☐ N/A
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What modeling technique did the owner or operator use? [68.25(g)] RMP Comp

12. Ensured that the passive mitigation system, if considered, is capable of withstanding the release event triggering the scenario and will still function as intended? [68.25(h)]	☒ Y ☐ N ☐ N/A
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13. Considered also the following factors in selecting the worst-case release scenarios: [68.25(i)]	☒ Y ☐ N ☐ N/A
☐ Smaller quantities handled at higher process temperature or pressure? [68.25(i)(1)]	
☐ Proximity to the boundary of the stationary source? [68.25(i)(2)]	

Hazard Assessment: Five-year accident history [68.42]

14. Has the owner or operator included all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage? [68.42(a)] Per facility no accidental releases in last 5 years	☐ Y ☐ N ☒ N/A
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15. Has the owner or operator reported the following information for each accidental release: [68.42(b)] ☐ Date, time, and approximate duration of the release? [68.42(b)(1)] ☐ Chemical(s) released? [68.42(b)(2)] ☐ Estimated quantity released in pounds and percentage weight in a mixture (toxics)? [68.42(b)(3)] ☐ NAICS code for the process? [68.42(b)(4)] ☐ The type of release event and its source? [68.42(b)(5)] ☐ Weather conditions (if known)? [68.42(b)(6)] ☐ On-site impacts? [68.42(b)(7)] ☐ Known offsite impacts? [68.42(b)(8)] ☐ Initiating event and contributing factors (if known)? [68.42(b)(9)] ☐ Whether offsite responders were notified (if known)? [68.42(b)(10)] ☐ Operational or process changes that resulted from investigation of the release? [68.42(b)(11)]	☐ Y ☐ N ☒ N/A
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Subpart G-Risk Management Plan [40 CFR 68.150 – 68.195]

Documented a Risk Management Plan as provided in 40 CFR 68.150-68.195?

☐

Comments:

1. Does the single registration form include, for each covered process: [68.160(b)(7)] ☐ The name and CAS number of each regulated substance held above the threshold quantity in the process? ☐ The maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits? ☐ The five- or six-digit NAICS code that most closely corresponds to the process? ☐ The correct program level of the process?	☒ Y ☐ N ☐ N/A
2. Does the registration form include whether a public meeting has been held following an RMP reportable accident, pursuant to §68.210(b)? [68.160(b)(21)]	☐ Y ☐ N ☒ N/A
3. Does the owner or operator provide in the RMP: [68.180(a)] ☐ Name, phone number and email address of local emergency planning and response organizations with which the stationary source last coordinated emergency response efforts, pursuant to §68.10(g)(3) or §68.93? [68.180(a)(1)] ☐ A list of Federal or state emergency plan requirements to which the stationary source is subject? [68.180(a)(3)]	☒ Y ☐ N ☐ N/A
4. Has the owner or operator reviewed and updated the RMP and submitted it to EPA [68.190(a)]? Reason for update: ☐ Five-year update. [68.190(b)(1)] ☐ Within three years of a newly regulated substance listing. [68.190(b)(2)] ☐ At the time a new regulated substance is first present in an already regulated process above threshold quantities. [68.190(b)(3)] ☐ At the time a regulated substance is first present in a new process above threshold quantities. [68.190(b)(4)] ☐ Within six months of a change requiring revised PHA or hazard review. [68.190(b)(5)] ☐ Within six months of a change requiring a revised OCA as provided in 68.36. [68.190(b)(6)] ☐ Within six months of a change that alters the Program level that applies to any covered process. [68.190(b)(7)]	☒ Y ☐ N ☐ N/A

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5. If the owner or operator experienced an accidental release that met the five-year accident history reporting criteria (as described at 68.42) subsequent to April 9, 2004, did the owner or operator submit the information required at 68.168, 68.170(j) and 68.175(l) within six months of the release or by the time the RMP was updated as required at 68.190, whichever is earlier.	☐ Y ☐ N ☐ N/A
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6. If the emergency contact information required at 68.160(b)(6) has changed since June 21, 2004, did the owner or operator submit corrected information within thirty days of the change?	☐ Y ☐ N ☒ N/A
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Subpart H-Other Requirements [40 CFR 68.200 – 68.210]

Implemented Other Requirements as provided in 40 CFR 68.200-68.210?

Comments:

1. Has the owner or operator maintained records supporting the implementation of this part at the stationary source for five years? [68.200]	☒ Y ☐ N ☐ N/A
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2. Did the owner or operator hold a public meeting to provide information required under §68.42(b), no later than 90 days after any RMP reportable accident at the stationary source with any known offsite impact specified in §68.42(a)? [68.210(b)]	☐ Y ☐ N ☒ N/A
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