

PROJECT PROFILE / **FERRELLGAS RISK MANAGEMENT PLANS**

PREPARING TO MANAGE ACCIDENTAL RELEASE RISKS

Gas stations and propane retail locations are exempt from the EPA's Risk Management Plan (RMP) regulations. But as Ferrellgas expanded operations, it needed to develop RMP programs for the large tank farms where its fuels were distributed to tankers. We are helping the company establish and document the necessary procedures.



PROCESS SAFETY MANAGEMENT PROCEDURES ADAPTED TO FILL NEED

The client needed to develop an RMP program across multiple sites to achieve compliance with EPA regulations.

Ferrellgas is a nationwide propane supplier. Its small propane tanks and facilities for refilling them are not subject to Risk Management Plan (RMP) regulations from the U.S. Environmental Protection Agency. However, the company has numerous locations across the country where railcars bring in fuel and offload it to large tank farms, where tankers collect it for wider distribution. Those sites are not exempt from RMP regulations.

As Ferrellgas explored expansion plans, it recognized that it needed to develop an RMP program for those sites to protect against environmental liability for spills or serious accidents. We were asked to help develop that program.

We have performed off-site consequence analyses, studied impact distance, and helped prepare procedures and a written risk management plan. We adapted some

Process Safety Management (PSM) procedures from the company's Blue Rhino subsidiary to develop appropriate procedures for Ferrellgas. Additionally, the team is providing training and helping develop piping and instrumentation drawings (P&ID) for some sites.

Under the RMP program, the EPA allow each firm to determine its RMP site level (on a scale of 1 to 3, with varying standards). Compliance audits are performed every three years. We have helped Ferrellgas prepare for inspection. When the EPA determined that a site originally classified as level 2 was actually level 3, we helped update the RMP to avoid penalties.

We are continuing to develop RMPs for several sites, with the process becoming increasingly efficient as we build on lessons from previous sites.



PROJECT STATS

CLIENT
Ferrellgas

LOCATION
Multiple sites

COMPLETION DATE
Ongoing

\$210K
TOTAL PROJECT COST

SITES IN
4
STATES TO DATE

18
RMP/PSM SERVICE
TYPES PROVIDED