To learn from past problems...
The 5-year accident history covers certain releases:

- The release must be from a **covered process** and involve a **regulated substance** held above its threshold quantity in the process.

- The release must have caused at least one of the on-site or offsite effects shown in the following table (40 CFR 68.42(a)):

<table>
<thead>
<tr>
<th>On-site</th>
<th>Off-site</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Deaths</td>
<td>✓ Deaths</td>
</tr>
<tr>
<td>✓ Injuries</td>
<td>✓ Injuries</td>
</tr>
<tr>
<td>✓ Significant property damage</td>
<td>✓ Evacuations</td>
</tr>
<tr>
<td></td>
<td>✓ Sheltering in place</td>
</tr>
<tr>
<td></td>
<td>✓ Property damage</td>
</tr>
<tr>
<td></td>
<td>✓ Environmental damage</td>
</tr>
</tbody>
</table>
Five-Year Accident History

- Report only accidents involving listed substances
  - If a person falls off a walkway due to a spill, it counts
- No reportable quantity (RQ)
  - If release causes items mentioned on previous slide, it must be reported
Required Data

- Required data includes
  - Date
  - Time
  - Release duration
  - Chemical(s)
  - Quantity released
  - Release event
    - Gas release
    - Liquid spill/evaporation
    - Fire
    - Explosion
    - Uncontrolled/runaway reaction
Required Data

- Release source
  - Storage vessel
  - Piping
  - Process vessel
  - Transfer hose
  - Valve
  - Pump
  - Joint
  - Other

Five-Year Accident History 5/7/2013
Required Data

- Weather conditions
  - Wind speed and direction
  - Temperature
  - Stability class
  - Precipitation present
  - Unknown
Required Data

- On-site impacts
- Known offsite impacts
- Initiating event
- Contributing factors
- Whether offsite responders were notified
- Changes introduced as a result of the accident

Five-Year Accident History
Brief description of the five-year accident history
(40 CFR 68.155(d))
Timeframe Requirements for Reporting

- When an RMP is first submitted
- When an RMP is updated
- Within 6 months of an accident
**5-Year Accident History**

OSHA's Form 300 (Rev. 01/2004)

Log of Work-Related Injuries and Illnesses

**Attention:** This form contains information related to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

<table>
<thead>
<tr>
<th>Identify the person</th>
<th>Describe the case</th>
<th>Classify the case</th>
<th>Remain at Work</th>
<th>Enter the number of days the injured or ill worker was</th>
<th>Check the 'Injury' column or choose one type of Illness</th>
</tr>
</thead>
<tbody>
<tr>
<td>(A) Case no.</td>
<td>(B) Employer's name</td>
<td>(C) Job title (e.g., Worker)</td>
<td>(D) Date of injury or onset of illness</td>
<td>Where the event occurred (i.e., Leading done work)</td>
<td>Describe injury or illness, parts of body affected, and objective evidence of injury or illness (e.g., Scratch injury from contact with tool)</td>
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</table>

**Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspect of this data collection, contact: U.S. Department of Labor, OSHA, Office of Employment Analysis, Room N3444, 200 Constitution Avenue NW, Washington, DC 20210. Do not send the completed forms to this office.**

**Year 20______**

**U.S. Department of Labor**
Occupational Safety and Health Administration

**Form approved OMB no. 1218-0039**

**Data Elements**

City __________________ State ________
Common Deficiencies

- Failure to report
  - Accidents with amounts below the CERCLA/EPCRA RQs
  - Triggers that require reporting (in accident history)
  - Accidents requiring more than first aid (when person was sent to a hospital just for “observation” or “preventative medicine”)
  - Offsite data (“do not know accurate number”)
Common Deficiencies

- Failure to update the RMP within 6 months to include:
  - An updated brief description in the executive summary
  - Section 6 information
Additional Thoughts

- Not all accidents in Section 6 may trigger an incident investigation (and vice versa).
- If an accident occurs which changes the program level from 1 to 2 or 3, facility has 6 months to establish the new program level and resubmit the RMP.
- Consider adding EPCRA/CERCLA reportable events to the RMP executive summary.