

Risk Management Planning Assistance

The Waste Management and Research Center (WMRC) is offering technical assistance to help Illinois businesses and facilities implement the new Risk Management Plan (RMP) requirements.

Many businesses handle propane, chlorine, ammonia, and other chemicals that could pose a risk to the surrounding community if an accident were to occur. As of June 1999, the chemical accident prevention rule from the U.S. Environmental Protection Agency (USEPA) will affect businesses and facilities that use hazardous chemicals.

What is the RMP rule?

The Clean Air Act Section 112(r): Prevention of Accidental Releases, requires companies and facilities to develop a risk management program to prevent accidental releases of certain chemicals from occurring. In addition to development of the RMP, a regular program of activities designed to prevent accidental chemical release should include training employees and inspecting and maintaining equipment.

The type and quantity of chemicals used will determine whether a plan is required. The toxic and flammable chemicals ("regulated substances") covered by this regulation include materials that many business and facilities commonly use and store. If these chemicals are above a certain quantity, development of a risk management program will be required. For example:

| | |
|-----------------|--|
| If you have.... | In excess of.... |
| Propane | 10,000 lbs. (a 2,500 gallon capacity tank) |

| | |
|---------------------|---------------|
| Chlorine | 2,500 pounds |
| Ammonia (anhydrous) | 10,000 pounds |

then you may be subject to these requirements. The regulated substance list identifies 77 toxic and 63 flammable chemicals requiring an RMP if the threshold quantities are exceeded.

Good News: You Already Do Some of This!

Many businesses comply with these requirements as part of their daily routine. The following is a list of programs or activities companies are required to do, but will not have to duplicate:

- ✗ Employee training on operating procedures for equipment
- ✗ Employee training on Material Safety Data Sheets and other OSHA Hazardous Communications requirements
- ✗ Maintenance and inspection of equipment and processes
- ✗ Documentation of equipment specifications

In addition, if you are already subject to the OSHA Process Safety Management Standard, you are likely to be in compliance with almost all of the requirements of the RMP rule.

How to Comply

To comply, businesses and facilities will need to develop a risk management program and prepare and submit a written summary of the program. It should include an executive summary (including planned changes to improve safety), registration of all regulated substances handled, offsite

consequence analysis (worst-case scenarios), a five-year accident history, a prevention program (levels 1, 2 or 3), an emergency response program (coordinated with local emergency responders), and certification by the owner/operator of the information submitted.

In addition to the above, the owner/operator will be required to review and update the RMP routinely, maintain records, make the information available to the public, and be subject to inspections and audits of the RMP.

What Do Companies Have to Do?

To determine if a company or facility is covered by the RMP rule contact WMRC or the USEPA Emergency Planning and RMP Hotline.

Why Am I Required to Do This?

The Risk Management Program rule is intended to prevent serious chemical accidents that could affect public health and the environment and improve the response to accidents that do occur. This new regulation builds upon the Emergency Planning and Community Right-To-Know Act.

Businesses and facilities that have adopted standards for accident prevention have found that the benefits outweigh the initial costs through:

- ✗ Improved operating performance due to better training and safer operations;
- ✗ Avoidance of serious accidents involving evacuation, injury, and even death;
- ✗ Better community and employee relations;
- ✗ Fewer chemical accidents; and
- ✗ Reduction in downtime caused by equipment malfunctions.

Complying with the Risk Management program requirements will put you on the road toward these important benefits. In addition, your risk management plan will help local fire, police, and emergency medical personnel and will be useful to the public in understanding the chemical hazards in their community.

Available Technical Assistance

WMRC will assist Illinois' businesses and facilities by providing general information and assistance at no charge. For those facilities in **RMP Pollution Program 1 and 2**, a \$1000 service fee will include:

- ✗ Providing documentation assistance,
- ✗ Completing offsite consequences and air dispersion modeling,
- ✗ Providing pollution prevention or source reduction assistance,
- ✗ Completing an Executive Summary, and
- ✗ Submitting the RMP to USEPA.

For further information on RMP contact:

WMRC
One East Hazelwood Drive
Champaign, IL 61820
217-333-8940

WMRC — Chicago
Clean Manufacturing Program
1010 Jorie Blvd., Suite 12
Oak Brook, IL 60523
630-472-5028

Other Assistance Available

To find out if the rule applies to your business or facility:

EPA's Emergency Planning and Risk Management Hotline: 800-424-9346

For information, guidance, documents and other electronic resources:

USEPA Chemical Emergency Preparedness and Prevention Office (CEPPO) Internet homepage:
<http://www.epa.gov/ceppo>
