

Risk Management Plan Changes

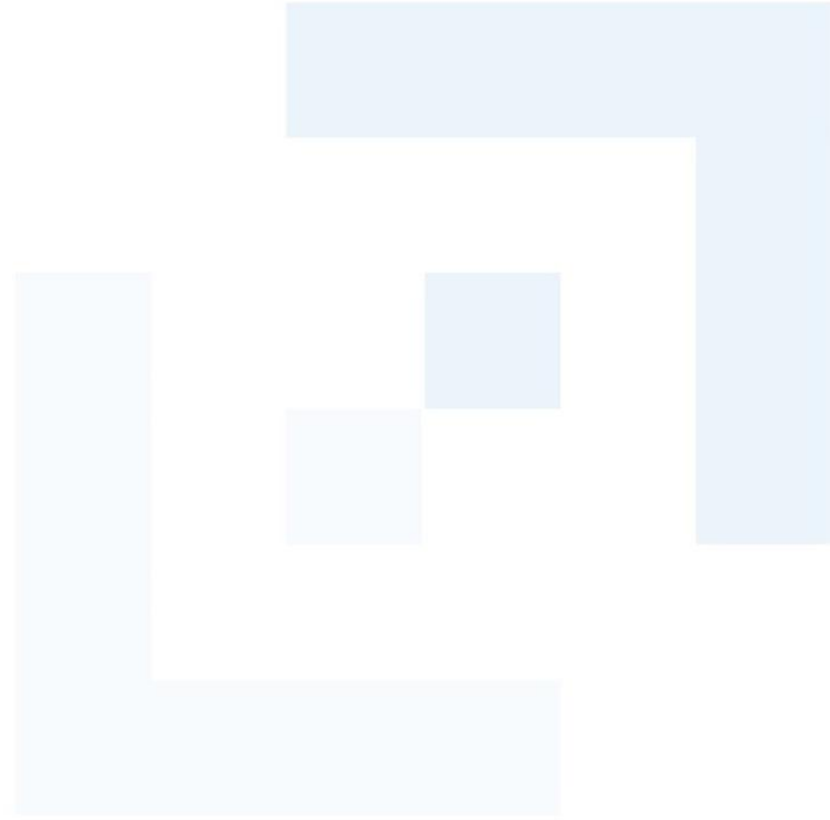
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Here we go again.



Rounds 1 and 2 of the RMP Updates

- 2017 RMP Amendments Final Rule
 - New requirements for accident prevention
 - New requirements on public notification / information sharing
 - New audit requirements
- Most new requirements never went into effect
- 2019 RMP Reconsideration Final Rule
 - Rescinded or Modified most of the 2017 rule
 - Followed three petitions for reconsideration

Current Round: EPA's Safer Communities by Chemical Accident Prevention Proposed Rule

- Winning the Name Game
- Proposed rule followed listening sessions and open comment session in 2021
- Proposed rule issued August 31, 2022
- Comment period closed October 31, 2022
- EPA plans new rule for August 2023
- Proposed rule brings back MUCH of what 2019 reconsideration rescinded along with additional requirements

What is in the new rule?

Prevention Program – Planning

- Natural Hazards and Power Loss
- Facility Siting
- Safer Technologies and Alternatives Analysis

Prevention Program – Incident Response

- Root Cause Analysis
- Third-party compliance audits
- Employee participation

Emergency Response

- Community Notification of RMP Accidents
- Emergency Response Exercises

Information Availability

- Enhanced information availability
- Requirement to provide chemical hazard information upon request to residents living within 6 miles of the facility

Other components

- Regulatory edits addressing PSM, RAGAGEP, recordkeeping
- Phased implementation
 - Earliest components 3 years after effective date

Questions?

