Where Can I Get More Information?

If you have access to the Internet, you can get copies of the rule and a wide variety of technical assistance materials at the home page of EPA's Chemical Emergency Preparedness and Prevention Office (http://www.epa.gov/swercepp/).

You also may obtain copies of these materials as well as answers to your specific questions from EPA's hotline at (800) 424-9346 during normal business hours.

The National Association of Chemical Distributors can be reached at:

1525 Wilson Boulevard
Suite 750
Arlington, VA 22209
(703) 527-6223

The full text of the rule can be found in Title 40 of the **Code of Federal Regulations** (40 CFR part 68), which is available at most public libraries.

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Chemical Emergency Preparedness and Prevention Office (CEPPO)
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Washington, DC 20460

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RMP SERIES

EPA's Risk Management Program

How Does It Affect Chemical Distributors?

COVER

Does This Apply to Me?

Under a new EPA chemical accident prevention rule, some chemical distributors will have to implement a risk management program and file a risk management plan (RMP) with EPA by June 21, 1999. If you handle, produce, or store any of the following above the threshold quantities, you are likely to be subject to this rule:

Chemical	Threshold Quantity
Anhydrous ammonia	10,000 pounds
Chlorine	2,500 pounds
Formaldehyde	15,000 pounds
Aqueous hydrochloric acid (concentration 37% or greater)	15,000 pounds
Hydrofluoric acid	1,000 pounds
Nitric acid	1,000 pounds
Propylene oxide	10,000 pounds

Other acutely toxic chemicals have threshold values ranging from 1,000 pounds to 20,000 pounds. Flammable chemicals such as dimethylamine, isopropyl chloride, isopropylamine, and propane each have a threshold quantity of 10,000 pounds. (The use of propane as a fuel is covered by the rule.) If you have other chemicals at your facility, you can get a complete list of substances regulated under this rule and their thresholds from EPA.

What's It All About?

The risk management program rule (also known as Clean Air Act section 112(r), the RMP rule, or part 68) is designed to prevent serious chemical accidents that could affect public health and the environment and to improve the response to any accidents that do occur.

The rule requires covered facilities to develop and to implement an integrated system to identify hazards and manage risks. If you are subject to this rule, you must analyze worst-case releases, document a five-year history of serious accidents, coordinate with local emergency responders, and file a risk management plan with EPA. If your worst-case release could affect the public, you also must analyze more realistic alternative scenarios and develop and implement a prevention program that includes, among other steps, identification of hazards, written operating procedures, training, maintenance, and accident investigation. If your employees respond to accidental releases, you must implement an emergency response program. The RMP you submit to EPA will summarize your program and will have to be made available to the public.

Compliance Tips

The good news is that many chemical distributors already are complying with many of the prevention requirements because these steps are part of the way you operate safely. If you are subject to the OSHA Process Safety Management Standard, you are likely to be in compliance with almost all of the prevention program requirements and may need to take no other steps to satisfy this part of EPA's rule. If you already have an emergency response plan, you are likely to be in compliance with that part of EPA's rule as well.

Besides helping you prevent accidents, the rule can improve the efficiency of your operation by ensuring that your workers are trained in proper procedures and by using preventive maintenance to reduce equipment breakdowns.

EPA is working with the National Association of Chemical Distributors (NACD) to develop a guidance document specifically for chemical distributors that will help you understand the requirements as they relate to your operations. The chemical distributor guidance will make compliance less burdensome by providing industry-specific information and analyses.