



RISK MANAGEMENT PROGRAM (RMP)

The United States Environmental Protection Agency (EPA) created a regulation called Risk Management Program as an amendment to the Clean Air Act. This document describes the program, also known as RMP, the information it will make public and how members of the Safety Council of Greater St. Louis RMP Work Group are involved.

WHAT IS RMP?

The Risk Management Program, or RMP, rule requires facilities with certain quantities of chemicals and other regulated substances on a specific EPA list to disclose certain information. Those facilities will make publicly available their emergency response programs, which include plans to prevent and minimize the effect of incidents. The initiative also provides an opportunity for a dialogue between these facilities and the general public.

A HISTORICAL PERSPECTIVE

In recent decades, public interest in chemicals and other materials used in manufacturing and processing has grown. In response, Congress in 1990 passed amendments to the Clean Air Act. One of those amendments set up the Risk Management Program. This rule builds on earlier regulations dating back to 1985. One of the first programs, the Emergency Planning and Community Right-To-Know Act, or EPCRA, focused on locations and quantities of stored materials, along with emergency response procedures. A second regulation was the Process Safety Management, or PSM, rule administered by the federal Occupational Safety and Health Administration (OSHA), which sets and monitors workplace safety standards. PSM is aimed at minimizing risks through proper operation, maintenance and modification of chemical handling equipment. The Risk Management Program expands the elements of PSM and encourages facilities to share their RMP program with the public.

WHAT ARE THE RMP REQUIREMENTS?

The Risk Management Program rule applies to facilities that manufacture, process, use or store EPA-listed materials in quantities that exceed levels specified in the regulation. RMP applies only to stationary, or non-moving, process equipment—such as mechanical process equipment, storage vessels and warehouses. Sites with certain quantities of these materials must implement a program to prevent incidents and write a document, or risk management plan, to communicate potential risks and to explain safety plans in the event of a potential incident.

The reports will include:

- Quantities of eligible materials on site
- Safety management goals
- Current safety management procedures
- An analysis of potential risk

The RMP rule also asks sites to determine both "worst case" and "alternative case" scenarios related to potential incidents. These scenarios take into account potential quantities released, weather, wind direction and wind speed. The worst case scenarios assume all safety systems fail and there is no emergency response. It is important to note that these scenarios are highly unlikely.

The deadline for submitting risk management plans to the EPA is June 21, 1999.

GREATER ST. LOUIS RMP WORK GROUP

Facilities representing a variety of industries joined with public emergency responders and others in the metropolitan area to form the Safety Council of Greater St. Louis RMP Work Group. Participants are from the city of St. Louis, the Missouri counties of St. Charles and St. Louis and the Illinois counties of Madison and St. Clair and represent the thousands of RMP-eligible facilities nationwide. Because of the quantity and type of materials they have on site, some members of the Work Group are required to develop and make publicly available risk management plans. Other members are not required to submit such plans, but are doing so because they have a "general duty" to participate in a public dialogue about the issue.