Greater St Louis Area

EPA RMP (Risk Management Program) Communication Rollout Work Group

BACKGROUND:

Under EPA regulations, all owners and operators of facilities have a general duty to identify hazards that may result from accidental releases; to design and maintain safe facilities; and to minimize the consequences of releases when they occur. In support of this general duty, a Risk Management Program (RMP) is required of owners/operators whose facilities use or produce certain hazardous materials Ñ including 77 acutely toxic chemicals, 63 flammable gasses and volatile flammable liquids, and some high explosive substances Ñ at or above EPA-specified threshold levels. RMPs for covered processes must be submitted to a central location, and be made available to the public, and to local and state planning agencies. It is expected that the local LEPCs will be asked by the public to assure that these events can be properly managed and the impact to the community properly minimized.

The facility (or Òstationary sourceÓ in EPA parlance) must describe its prevention and emergency response approach; its regulated substances; both its worst-case release scenario(s) and alternative release scenario(s), including any administrative controls applied to limit the release quantity; its general prevention program and chemical-specific prevention steps; its five year accident history; its emergency response program; and planned changes to improve safety.

The intent of the rule is "...for the *local community to understand its risk* from chemical accidents and to help them *work with sources using these chemicals to reduce* such risks..." ". . . designed principally *to support a dialogue* between the source and the community on release prevention, and not to serve as the sole or primary basis for local emergency planning." EPA in preamble to the Rule.

Meeting objective:

To establish an agreement among interested parties representing the Greater St. Louis Area on the:

- merits of a coordinated planning and rollout effort of the RMP in the Greater St Louis Area;
- potentially interested parties;
- roles and responsibilities of interested parties;
- scope and strawmodel for the effort;
- strategy for obtaining buy-in from interested parties;
- roles, responsibilities and agenda for 11/10 and 11/20 organizational meetings.

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PROPOSAL :

Under the auspices of the Safety Council of Greater St Louis, a 501c(3) public safety organization covering the greater metropolitan St Louis area, coordinate the communications of RMP throughout the greater St Louis Area. Sponsors of the communications process will be the: LEPCs of St Louis City, St Louis County, St Clair County, and Madison County and the RCGA and the DCSIL

The Safety Council is an old line community 501c3 service organization located in downtown St. Louis. Activities of the Council fall into four major categories; Community/Home Safety and Health; Traffic Safety programs; Children Safety; Occupational Safety and Health.

Work plan:

Identify parties
Sell value of coordinated effort
Understand roles and responsibilities
Develop RMP Communications Rollout Steering Team
Secure communications/coordination resource - secure funds for support
Develop communications plan - obtain buy-in
Execute
Follow-up / feedback

Strawmodel - communications plan

Safety Council - umbrella
LEPC and Business interest - sponsorship
Steering Team - interested parties
Outside consultant - leader and coordinator

Communications:

Employees - Company discussions and printed materials
Labor Unions - Company discussions and printed materials
Contract Employees - Company discussions and printed materials
LEPC/Emergency Responders - Company discussions and printed materials
CAPs - Company discussions and printed materials
Elected Officials/State & Local - LEPC discussions and printed materials
Hospitals/Schools - LEPC discussions
Media - LEPC discussions
Near Neighbors - General company - site open house

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RMP Communication Challenges

Develop messages
Prevention
Emergency Response

Build credibility

RMP Communications Team Work Process

Mission statement
Prepare Plan and time line
Determine Communication needs and methods of delivering to stakeholders and audiences, e.g. .....small face to face
Use existing community outreach channels
Determine timing for RMP communication

RMP WORKING OBJECTIVES

Proactive, Broad, Open , Honest, Understandable Communications
Minimize Apprehension
Prevention & Protection Commitment
Community, local Industry , local Government -- dialogue
Industry, Citizens, Government -- Safety Partnership

RMP COMMUNICATIONS
KEY MESSAGES

Risk Reduction & Prevention
Emergency Preparedness & Response
Models are Tools , Not Probability Predictions
Everyone has a Role in Community Safety
Not New--- (Industry)-Accident Prevention, Responsible Care, CAER, PSM
(Parish)--DEP, LEPC, Mutual Aid
On-Going Dialogue
Openness, Trust, Proactive
Safety Partnership in the Community

RMP Communication Best Practices

RMP should be an extension of existing community outreach efforts
Involve a broad range of stakeholders
Working together with other area companies is essential to present unified message
Consider 3rd party consultants for validating technical results
Align with credible 3rd parties- LEPC, CAP, DEP, etc.....
Communicate to employees first

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Accomplishments We have Already Seen

Technical assistance with OCA, etc.
Emergency Response Sub Team:
Review of Emergency plans, Gap analysis
Recommendations, Implementation,
LEPC / EOC / DEP Coordination
Positive Impact and involvement of community members
Communication Tools and strategies
Ongoing Safety Partnership- between Industry, citizens, government

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