

EPA data show that a small number of facilities are responsible for the majority of accidents

- There are 12,542 facilities covered under RMP.
- Between 2004-2013, 1,008 (8.0%) of those facilities reported at least one RMP-reportable accident.
- Those 1,008 facilities reported a total of 1,517 accidents during that time.
- Of the 1,517 accidents, about half (48%) came from 224 facilities, i.e., 1.8% of the total number of facilities in the program.
- 92% of facilities covered under RMP had no accidents between 2004-2013.

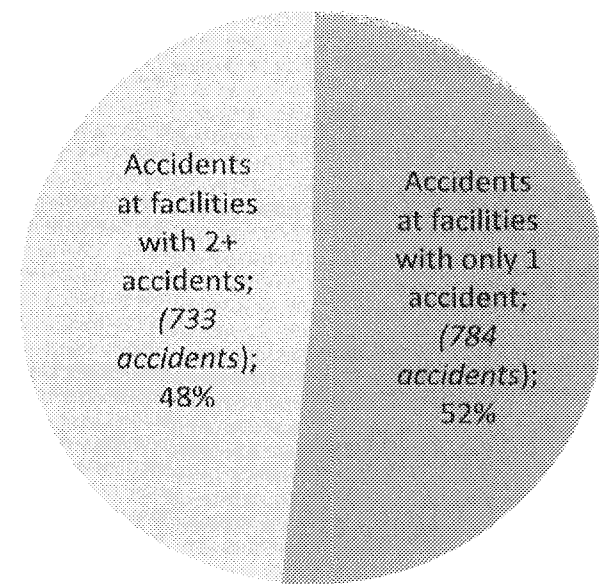
More than 90% of All RMP Facilities Had No RMP-Reportable Accidents

	Number of Facilities	% of Total Number of Facilities in RMP
Facilities with 1 or more accidents		
1 accident	784	6.2%
2 or more accidents	<u>224</u>	<u>1.8%</u>
Total facilities with accidents	1,008	8.0%
Facilities with no accidents	<u>11,534</u>	<u>92.0%</u>
Facilities in RMP	<u>12,542</u>	<u>100.0%</u>

Nearly half of all accidents occurred at 224 facilities

All Facilities with Accidents

A	B	
Number of facilities	Number accidents per facility	Number of accidents (A x B)
784	1	784
125	2	250
46	3	138
18	4	72
8	5	40
12	6	72
3	7	21
2	8	16
3	9	27
1	10	10
1	11	11
1	13	13
1	14	14
2	15	30
<u>1</u>	<u>19</u>	<u>19</u>
Total	1,008	n/a



EPA data show that few facilities are responsible for the majority of accidents at chemical facilities.

- There are 1,465 chemical manufacturing (NAICS 325) facilities are covered under RMP.
- Between 2004-2013, 258 (17.6%) of those facilities reported at least one RMP-reportable accident. Those 258 facilities reported a total of 530 accidents during that time.
- Of the 530 accidents, the majority (70%) came from just 99 facilities, i.e., 6.8% of the total number of chemical facilities in the program.
- 82.4% of chemical facilities covered under RMP had no accidents between 2004-2013.

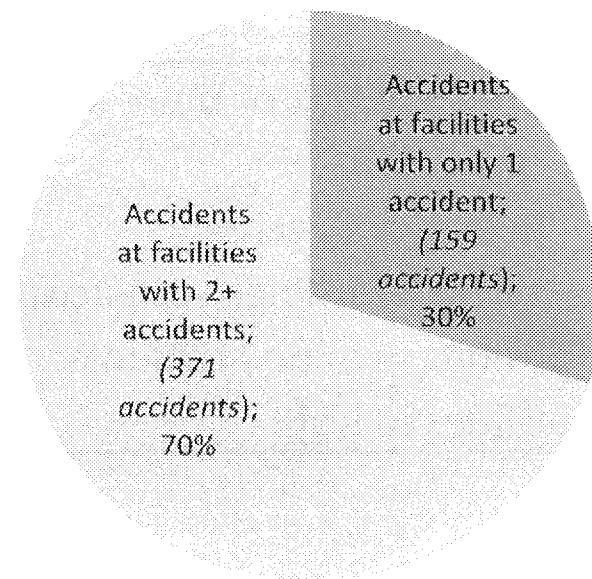
More than 80% of Chemical Manufacturing (NAICS 325) Facilities Had No RMP-Reportable Accidents

	Number of Facilities	% of Total Number of Facilities in RMP
<hr/>		
Facilities with 1 or more accidents		
1 accident	159	10.8%
2 or more accidents	<u>99</u>	<u>6.8%</u>
Total facilities with accidents	258	17.6%
Facilities with no accidents	<u>1,207</u>	<u>82.4%</u>
Facilities in RMP	<u>1,465</u>	100.0%

The majority of accidents were at a handful (6.8%) of chemical facilities

Chemical Manufacturing (NAICS 325) Facilities with Accidents

	A	B	
	Number of facilities	Number accidents per facility	Number of accidents (A x B)
	159	1	159
	45	2	90
	24	3	72
	9	4	36
	5	5	25
	7	6	42
	1	7	7
	1	8	8
	2	9	18
	1	11	11
	1	14	14
	2	15	30
	<u>1</u>	<u>18</u>	<u>18</u>
Total	258	n/a	530



Notes and Sources

- This analysis expands on the data in Table 1-Accident Frequencies for RMP Facilities by Industrial Grouping, 2004-2013 in the Technical Background Document for Notice of Proposed Rulemaking: Risk Management Programs Under the Clean Air Act, Section 112(r)(7) (January 27, 2016).
- Using the 10-year accident database provided by EPA, ACC tabulated the number of unique facilities that were involved in accidents and found that **a minority of facilities had a reportable accident over the 10-year period.**
- Consistent with EPA, this analysis includes only RMP reportable accidents (accidents with onsite or offsite impacts). The database provided by EPA included “voluntary submissions” of accidents with neither onsite nor offsite impacts, but these incidents are not included in the counts of RMP accidents.

RMP 10 Year Accident Data Results (2004-2013)

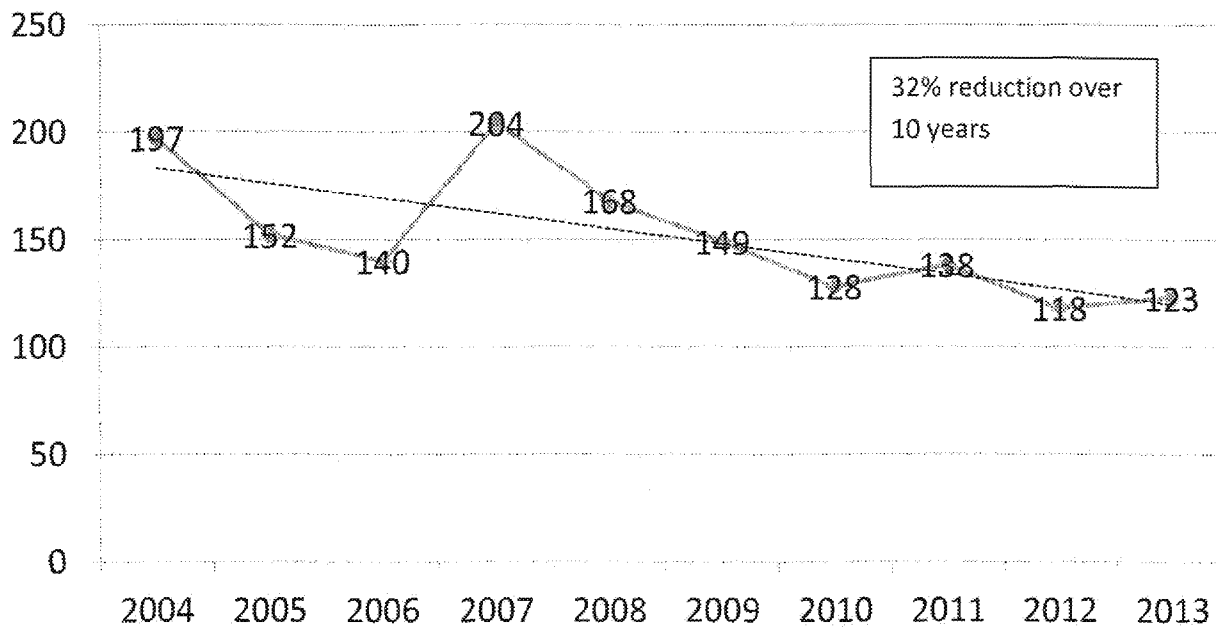
A.) Number of Accidents with RMP-Reportable Impacts

Includes: Onsite Deaths-Workers/Contractors, Onsite Deaths- Public Responders, Onsite Deaths-Public, Injuries-Workers/Contractors, Injuries-Public Responders, Injuries-Public, Onsite Property Damage, Offsite Deaths, Offsite Hospitalizations, Offsite-Other Medical Treatments.

Year	Total
2004	197
2005	152
2006	140
2007	204
2008	168
2009	149
2010	128
2011	138
2012	118
2013	123
Total	1,517

Number of Reported Accidents with Impact

Number of Accidents

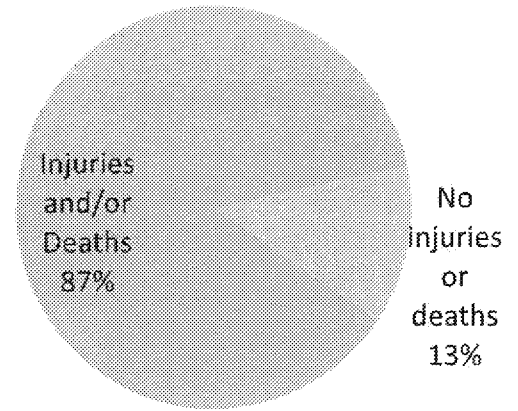


B.) RMP Impact Accidents with Injuries and/or Deaths

Includes: Onsite Deaths-Workers/Contractors, Onsite Deaths- Public Responders, Onsite Deaths-Public, Injuries-Workers/Contractors, Injuries-Public Responders, Injuries-Public, Onsite Property Damage, Offsite Deaths.

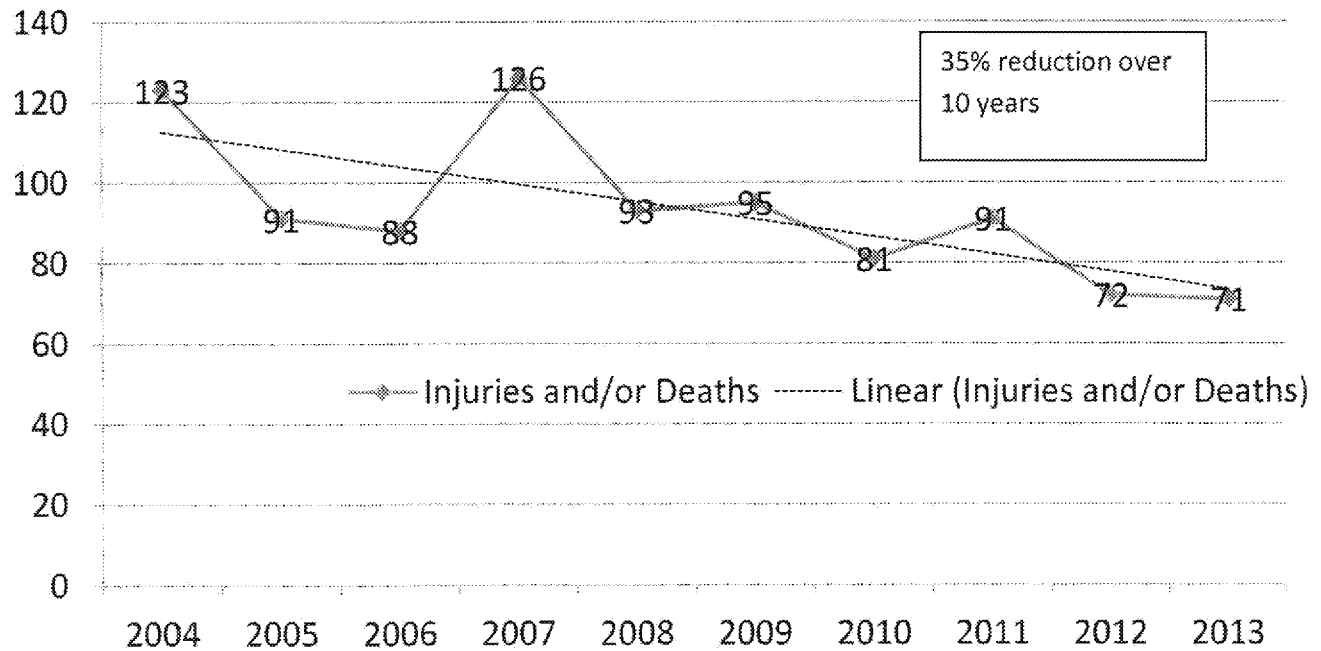
Not included: medical treatments or offsite hospitalizations

Year	Injuries or Deaths	No Injuries or Deaths	Total
2004	123	74	197
2005	91	61	152
2006	88	52	140
2007	126	78	204
2008	93	75	168
2009	95	54	149
2010	81	47	128
2011	91	47	138
2012	72	46	118
2013	71	52	123
Total	931	586	1,517



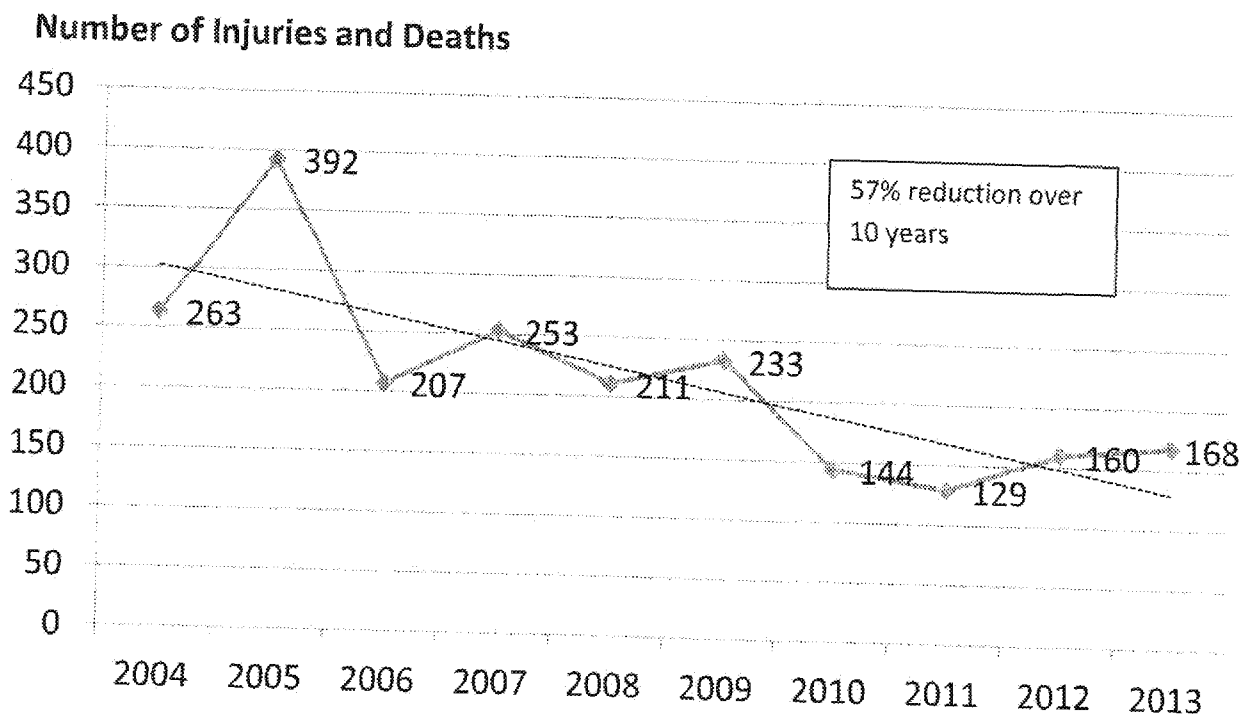
Accidents with Impacts: Injuries and/or Deaths

Number of Accidents



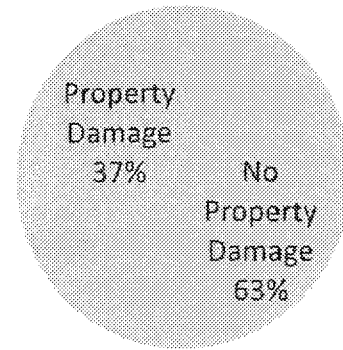
C) Number of Injuries and/or Deaths per year

Year	Total Number of Injuries and Deaths
2004	263
2005	392
2006	207
2007	253
2008	211
2009	233
2010	144
2011	129
2012	160
2013	168
Total	2,160



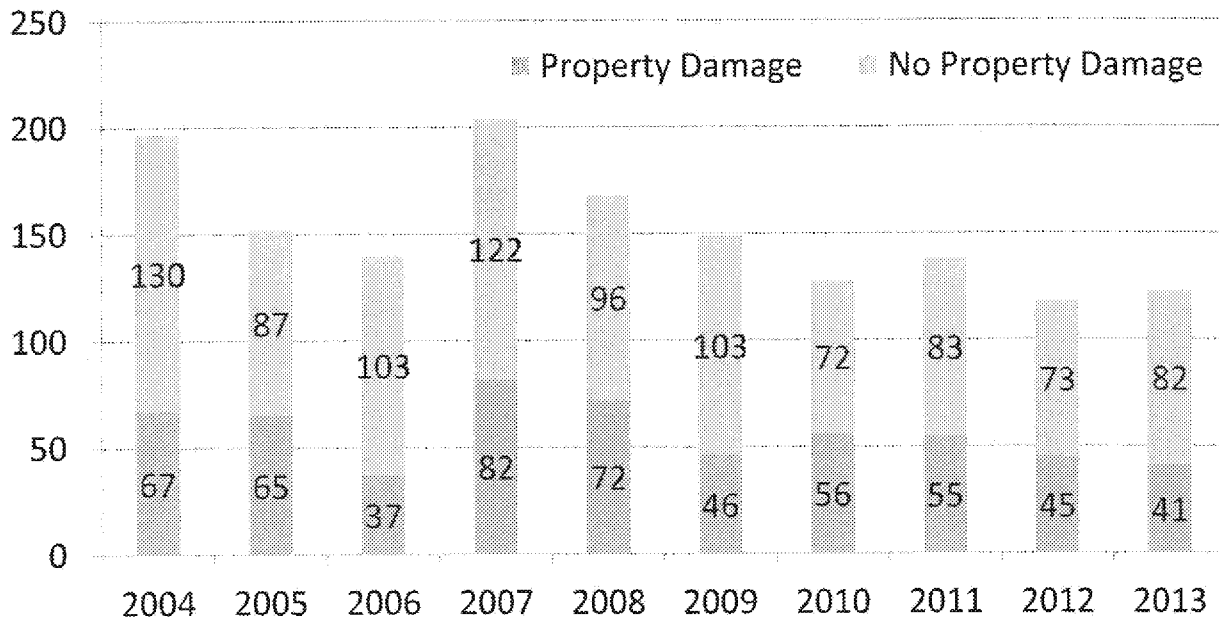
D) Property Damage- On and Offsite

Year	Property Damage	No Property Damage	Total
2004	67	130	197
2005	65	87	152
2006	37	103	140
2007	82	122	204
2008	72	96	168
2009	46	103	149
2010	56	72	128
2011	55	83	138
2012	45	73	118
2013	41	82	123
Total	566	951	1,517



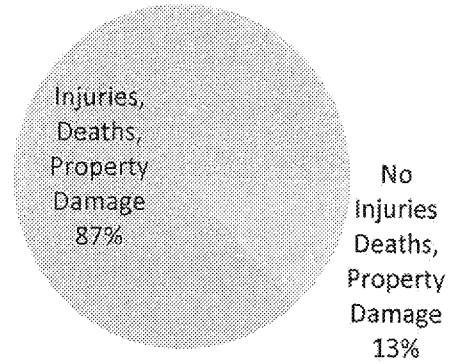
Accidents: Property Damage

Number of Accidents



E) All Accidents with Injuries, Deaths, or Property Damage

Year	Injuries, Deaths, Property Damage	No Injuries, Deaths, Property Damage	Total
2004	170	27	197
2005	135	17	152
2006	116	24	140
2007	181	23	204
2008	144	24	168
2009	122	27	149
2010	117	11	128
2011	129	9	138
2012	105	13	118
2013	103	20	123
Total	1,322	195	1,517



Accidents with Impacts: Injuries, Deaths, and/or Property Damage

