

Chlorine handlers: Is your RMP ready?

Risk Management Planning is a requirement under the Clean Air Act, section 112(r)(7). The objectives of 112(r) are as follows:

- To prevent or minimize accidental releases of hazardous substances that can affect both the environment and public health, and
- To foster relations between industry and the public to improve emergency response and accident prevention.

The ruling applies to all businesses which have more than a threshold quantity of a regulated substance in a process at their facility, including storage. As a chlorine handler, you will have to file a risk management plan (RMP) with the EPA by June 21, 1999, to be in compliance if you use, process, handle or store more than 2,500 pounds of chlorine.

A risk management plan is comprised of four key elements:

- A management system, which implements the RMP
- A hazard assessment, which includes a historic analysis and evaluation of hazards,
- A prevention program, which states operating procedures and prevention measures, and
- An emergency response program, which details duties of employees and responders.

The detail that goes into each of these elements is dependent upon you, the facility. Most chlorine handlers in the state will fall under either Program 1 or Program 2 status of 112(r). If your facility is involved in the production of chlorine (SIC code 2812), then you will fall under Program 3 status. The program you fall under is dependent upon your potential impact on surrounding communities and your past environmental track

record. Regardless, if you're subject to 112(r), you will have to analyze worst-case release scenarios for your respective facilities, document any serious accidental releases from your facilities over the last five years, and have coordinated emergency response with your local emergency planning committee, or LEPC.

To evaluate whether an accident has the potential to affect others beyond your facility's boundaries, the EPA developed the *RMP Off-site Consequence Analysis (OCA) Guidance* (EPA, 1996), a publication comprised of simple calculations and look-up tables. This guidance document can be found on the Internet at <http://www.epa.gov/swercepp/tech.html>, or can be obtained by calling 800-424-9346 and talking with a representative. RMP*Comp, a computerized version of the above document, or other computer models can also be used in the evaluation of case scenarios.

There has been some question as to what qualifies as a public receptor. As a general guideline, any location that is freely accessible to the public and where the public could potentially be exposed, is considered a public receptor. A public receptor is thus defined to include either permanent or temporary residences, including work or other areas where people congregate. Examples of temporary residences include the following:

- Recreational lakes, rivers and grounds
- Ball fields
- Churches

Transportation routes are not included. A road that travels next to your facility is not a public receptor since its primary purpose is transportation. Remember, however, that under the general duty clause of the rule, some form of emergency response should be included for any heavily traveled road. Your own facility will not count as a public receptor as long as your grounds do not contain a region that is openly accessible to and used by the public. If any receptors fall within the worst-case boundaries, then EPA requires that the number of people affected be estimated and identified. The LandView II or III systems,



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which utilize 1990 U.S. Census data, are used for such a task. Assistance with population estimates for communities or counties in Kansas can also be obtained by calling the Division of Budget at 785-296-2436.

Environmental receptors, which include national and state parks, monuments, wildlife preserves and federal wilderness areas, can be determined from a local area U.S. Geological Survey Topographic map (7.5 minute-15 minute), which can be obtained at many libraries or by writing to:

Distribution Branch of the USGS
P.O. Box 25286
Denver Federal Center
Denver, CO 90225
303-236-7477

Additional assistance can be obtained by calling the National Cartographic Information Center at 303-202-4200. Software programs, such as LandView, also provide this information and can be obtained by calling the Census Bureau at 301-457-4100 or visiting <http://www.epa.gov/ceppo/tools.html>.

And if you have questions about your...

■ EPA facility identification number

- If covered by RCRA, your ID will be your RCRIS Handler ID.
- If covered by CERCLA, your ID will be your CERCLIS Facility ID.
- If not covered by RCRA or CERCLA, but under TSCA, your ID will be your PADS ID.
- You can access your ID at:
http://www.epa.gov/enviro/html/fii/fii_query.html.

■ Facility Dun and Bradstreet number

- These numbers can be obtained by calling 800-234-3867.

■ Facility latitude and longitude

- Coordinates can be estimated by using a USGS topographic map.
- EPA form R has an appendix that outlines how to determine coordinates and instruction booklets can be ordered by calling the EPCRA hotline at 800-424-9346.

■ Your coverage under other federal or state emergency plan requirements

- For OSHA 1910.138, OSHA's emergency action plan, call 202-260-0154.
- For OSHA 1910.120, HAZWOPER plan, call 202-260-0154.
- For RCRA regulations, call 800-424-9346.
- For Clean Water Act regulations and SPCC plans, call 202-260-5700.

■ Your electronic submission of your RMP

- The EPCRA Hotline can help answer specific questions, 800-424-9346.
- The submitting software, *RMP Submit*, is being made available. Submittals can be received after Jan. 4, 1999.
- A hardcopy outline of the RMP electronic submission form is available by calling the Kansas Small Business Environmental Assistance Program at 1-800-578-8898. The outline lists contacts who can answer commonly asked questions regarding RMPs.

Although it may seem like a lot, many of the ideas and requirements of 112(r) are covered under other standards and acts, and hence your facility may already be in compliance with many of the key issues of the rule. For example, if you are already in compliance with OSHA's Process Safety Management Program (PSM), most likely you are already complying with many of the prevention program requirements and will have to do only a little more to satisfy 112(r). Additionally, many facilities already have emergency response plans in place. Do remember, however, that OSHA standards are primarily concerned about worker safety, while plans drafted for 112(r) must also consider the safety of the public and the environment.

Remember, the purpose of a risk management plan is not only to be of use to local emergency planning committees, but also to help prevent accidents from occurring in the first place.

For additional information, you can contact the EPA Chemical Emergency Preparedness and Prevention Office (CEPPO) Internet site at <http://www.epa.gov/swercepp/>, or contact the Kansas Small Business Environmental Assistance Program (SBEAP) for technical assistance at Kansas State University at 800-578-8898.



The Small Business Environmental Assistance Program's (SBEAP) mission is to help Kansas small businesses comply with clean air regulations. SBEAP operates through a consortium of the University of Kansas, Kansas State University and Wichita State University. This fact sheet was published by Kansas State University's Pollution Prevention Institute. For more information, call 800-578-8898 or send e-mail to SBEAP@ksu.edu. The University of Kansas, Kansas State University and Wichita State University are EEO/AA providers.