



Risk Management Plan General Duty Clause

Your Responsibilities

Can an accidental release of a hazardous substance from your facility potentially harm the public or the environment? If so, your facility is probably subject to the Clean Air Act Amendment (CAAA) Section 112(r)(1) General Duty Clause (GDC) requirements of the Risk Management Program. **Note:** Non-compliance with the GDC carries penalties of up to \$27,000 per day for each violation (CAAA Section 113(b)).

Mostardi Platt Environmental can help

MPE can help you protect your company by assisting with all aspects of Risk Management Plan (RMP) preparations. We can help determine if your facilities are subject to 40 CFR 68, and generate all elements of an RMP, including:

- Perform Hazard Assessment of the storage/process
- Model accidental release (Offsite Consequence Analysis)
- Define offsite impacts
- Create Prevention Program
- Design Emergency Response Program
- Prepare RMP Submittal for the USEPA

Ongoing Requirements

- Every three years: you must perform an RMP Compliance Audit
- Every five years: you must update your RMP (or, within six months after a revised Hazard Review, Offsite Consequence Analysis or Program designation)
- At least once every five years: you must update your RMP Hazard Review



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Clean Air Act Amendment 112 (r)(1) Risk Management Planning Requirements



Full-service
solutions that work
for business.



Mostardi Platt Environmental Risk Management Plan

Innovative ways to meet requirements

Mostardi Platt Environmental (MPE) understands the Risk Management Plan (RMP) from your point of view. We can help you meet the regulations, and we have often succeeded in eliminating or significantly reducing major RMP requirements. MPE's innovative, practical approach puts our clients first.

We also understand the need to avoid redundancy. If required, MPE environmental and safety professionals can develop an OSHA Process Safety Management (PSM) program concurrently with the RMP.

Reduce the regulatory burden and costs

Avoid regulatory complications and compliance costs by planning ahead with MPE. Strategizing with MPE at the *initial* design stage of new processes can result in significant regulatory compliance cost savings. Let us perform a preliminary regulatory and risk analysis (including air dispersion modeling). Then we will present you with the options for reducing your facility's regulatory burden.

Contact MPE for detailed information

Visit our Web site or contact us for more details on the RMP or OSHA PSM rules. MPE can help you protect your company.



About the Risk Management Plan rule

Communication and responsibility

Many people died in the catastrophic 1984 chemical release in Bhopal, India. This accident raised global awareness of the need to prevent toxic and flammable substance releases. To protect Americans from similar incidents, the Emergency Planning and Community Right-to-Know Act (EPCRA), also known as Title III of Superfund Amendments and Reauthorization Act (SARA), was passed in 1986. Communities must now develop emergency response plans using information shared by companies. The RMP rule complements and supports EPCRA by obligating industry to prevent accidents, operate safely, and manage hazardous chemicals in a safe and responsible way.

Which chemicals are regulated?

Generally the list includes toxic liquids, toxic gases, water solutions of toxic substances, flammable liquids, and flammable gases. The most common chemical substances in manufacturing facilities include ammonia, chlorine, ethylene, hydrochloric acid, hydrofluoric acid, hydrogen, isopentane, methane, nitric acid, pentane, propane, propylene, sulfur dioxide, sulfur trioxide and vinyl chloride. Facilities that use or store any hazardous substance, regardless of quantity, that could adversely affect the community or environment are subject to the requirements of the GDC. Visit our Web site for a full list of regulated substances and their threshold quantities.

Which facilities must comply?

Facilities that have more than a threshold level of any listed 77 toxic or 63 flammable substances must comply. MPE can help your company protect itself by determining your specific compliance requirements and documenting the review process and findings — even when no RMP is submitted.

Levels of obligation

Facilities that must submit RMPs have varying compliance obligations based on the types of substances contained in processes, historical offsite releases and the actual impact of historic releases on the community and/or environment. MPE can help you determine if your facilities are subject to the RMP rule, and at which level.

Program 1

These facilities exceed a listed threshold, but have no history of offsite releases resulting in death, injury or environmental impact, and have a modeled toxic or flammable endpoint distance that's less than the distance to any public receptor.

Program 2 and 3

These facilities store more than a listed threshold. They also store a listed substance with a toxic or flammable endpoint distance that can potentially impact public or environmental receptors.

Program 3

The process is already subject to OSHA PSM, or the process falls within one of the following NAICS codes:

NAICS Code	Description
32211	Pulp mills
32411	Petroleum
32511	Petrochemical manufacturing
325181	Alkalies and chlorine manufacturing
325188	All other basic inorganic chemical manufacturing
325192	Cyclic crude and intermediate manufacturing
325199	All other basic organic chemical manufacturing
325211	Plastics material and resin manufacturing
325311	Nitrogenous fertilizer manufacturing
32532	Pesticide and agricultural chemical manufacturing



How can we help you? Call Mostardi Platt Environmental today.

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