Program Requirements

Program 1
- Hazard Assessment
- Prevention Program
- Coord. ER with Local Authorities
- RMP

Program 2
- Hazard Assessment
- Safety Info
- Hazard Review
- Operating Program Procedures
- Training
- Maint. Program
- Audits
- ER Program
- Mgmt. System
- RMP

Program 3
- PSM Program Plus
  - Hazard Assessment
  - RMP
  - Emergency Response Program

Increasing Burden
Off-Site Consequence Analysis

- Release Scenarios
  - Worst Case
  - Alternative

- Release End Points
  - Toxic
  - Flammables

- Impact Determination (how many)
  - Public Receptors (schools, residences)
  - Environmental Receptors (wildlife refuges, state parks)
Worst-Case Release Scenarios

- Ultraconservative
- Can Use EPA Guidance or Other Accepted Dispersion Model
- Modeling Parameters Set by U.S. EPA.
- Separate Scenarios for Toxics and Flammables
- Can Consider Passive Mitigation and Administrative Controls
Alternative Release Scenarios

- More Realistic
- Uses Site-specific Parameters
- One for Each Regulated Toxic Substance
- One to Represent All Regulated Flammable Substances
- Considers Active and Passive Mitigation Systems
- Scenarios to Consider, Include Those...
  - More Likely Than Worst-case, and
  - Which Will Reach an Endpoint
- Endpoints (Same As Worst-case)
Don’ts

Don’t:

➢ Underestimate
➢ Ignore the Public
➢ Procrastinate

Due June 21, 1999
Do’s

Do:

- Look for ways to exit regulation
- Implement passive mitigation systems and/or administrative controls
- Leverage existing programs/elements
- Carefully craft RMP
- Build public goodwill
- Proactively engage public
- Start now