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)
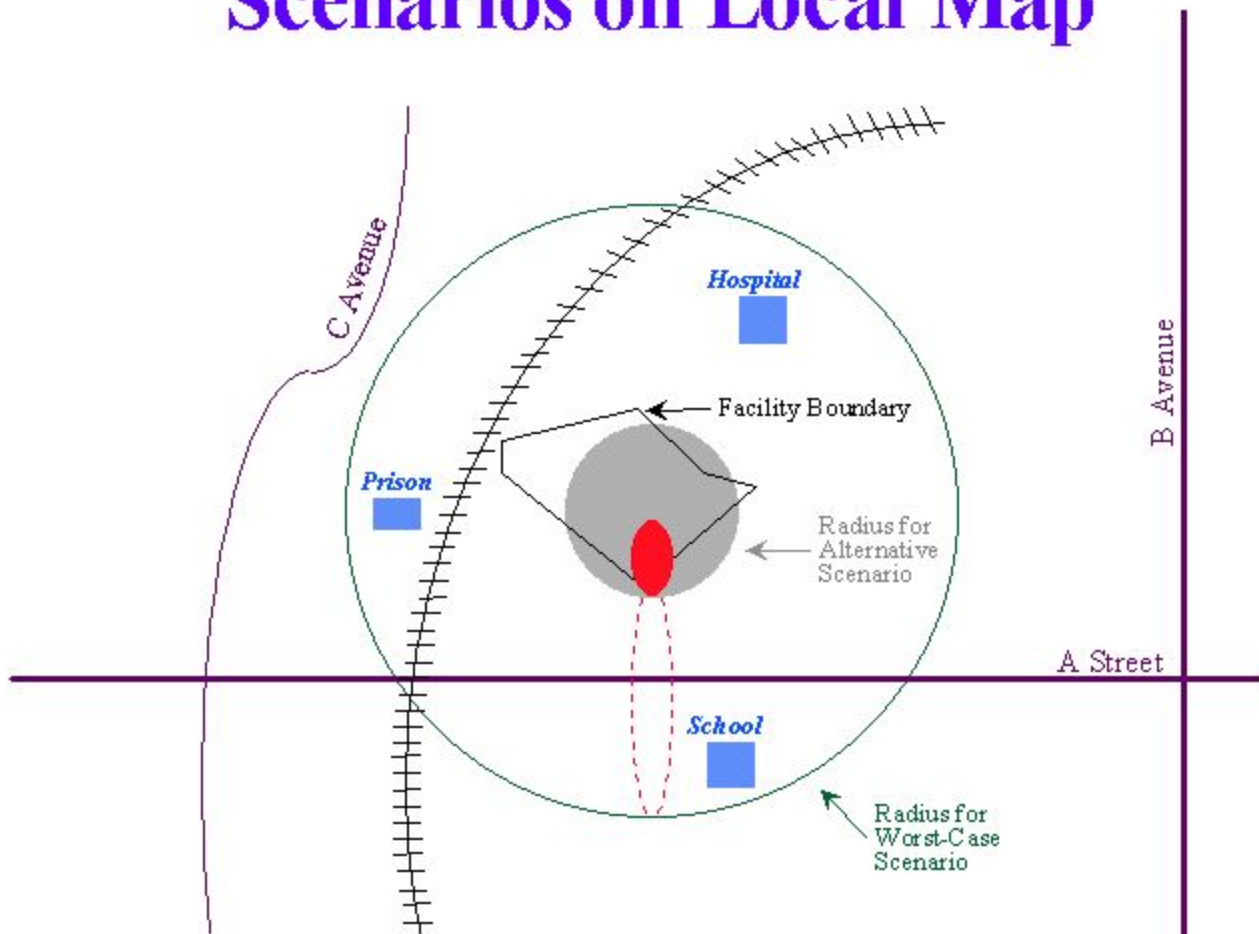 - Environmental Receptors (wildlife refuges, state parks)

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**

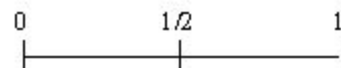➢ **Can Consider Passive Mitigation and Administrative Controls**

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)**

Worst-Case/Alternative Scenarios on Local Map

C Avenue

B Avenue

Hospital

Facility Boundary

Prison

Radius for
Alternative
Scenario

A Street

School

Radius for
Worst-Case
Scenario

Adapted from Model Risk Management Program and Plan for Ammonia Refrigeration, dated May 1996, by Science Applications International Corporation.

0   1/2   1

Typical alternative
scenario contour

Typical worst-case
scenario contour

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