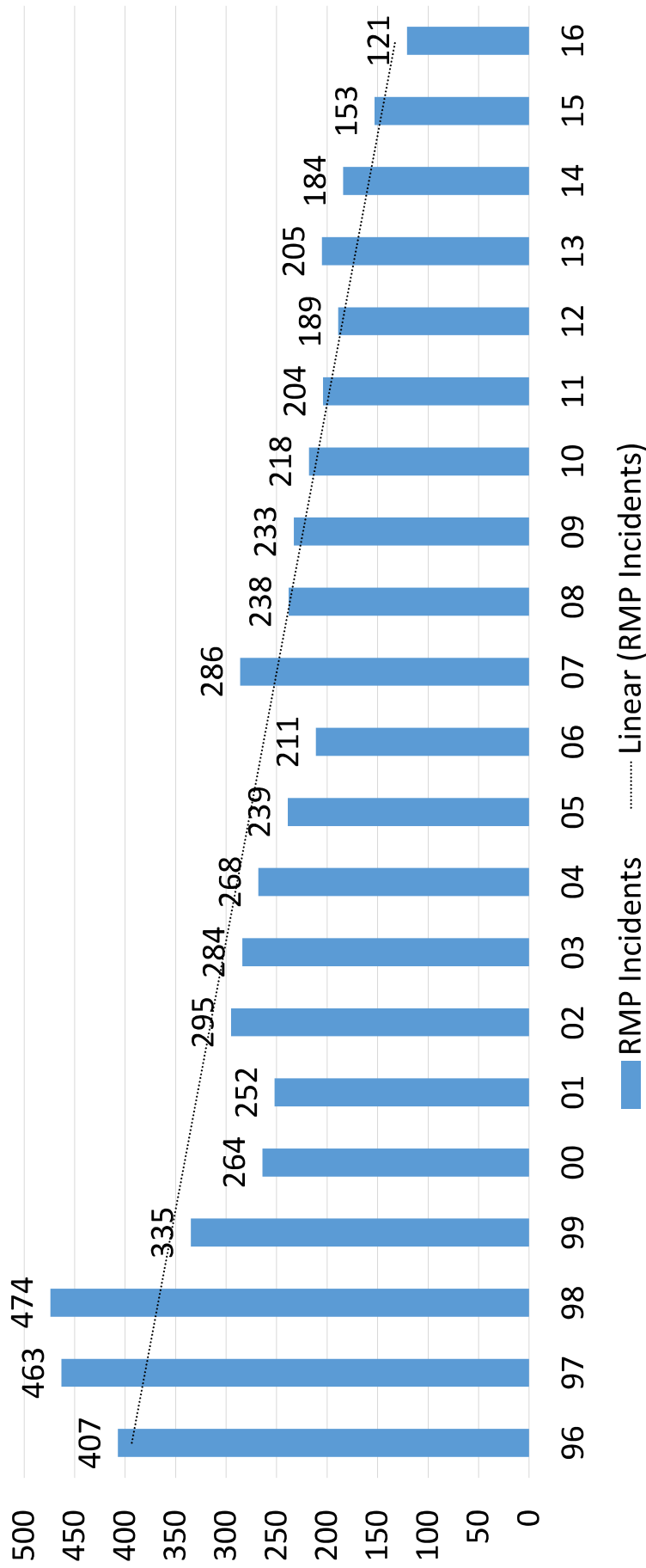


Figure 1. Historic Trend of RMP Incidents from 1996-2016 (67% decrease)



Source: EPA

National Compliance Initiative (NCI): Reducing Accidental Releases at Industrial and Chemical Facilities FY2020-2030

- EPA (OECA) reached out to ACC in 2018 to Partner on the NCI for Chemical Manufacturing
- Purpose is to help reduce risk to human health and safety and the environment from accidental chemical releases
- Focus on data to direct efforts and make the biggest impact
- NCI extended for three years, FY2020 - 2023

NCI Focus Analysis of RMP Database

- NAICS 325 Chemical Manufacturing
- Eight most recent fiscal years of data (Oct 2014 – May 2022)
- **390** unique incidents at **174** unique facilities
 - **188** incidents were “severe” (death, injury, hospitalization, or medical treatment)
 - **172** incidents were “not severe” (env. impact, property damage, shelter-in-place)
- **64** of **1650** (3.9%) facilities had multiple incidents
 - These facilities accounted for 250 of the 360 incidents (69%)
 - These facilities accounted for 64 of the 188 severe incidents (34%)

Number of Incidents by Year (Chemical Industry)

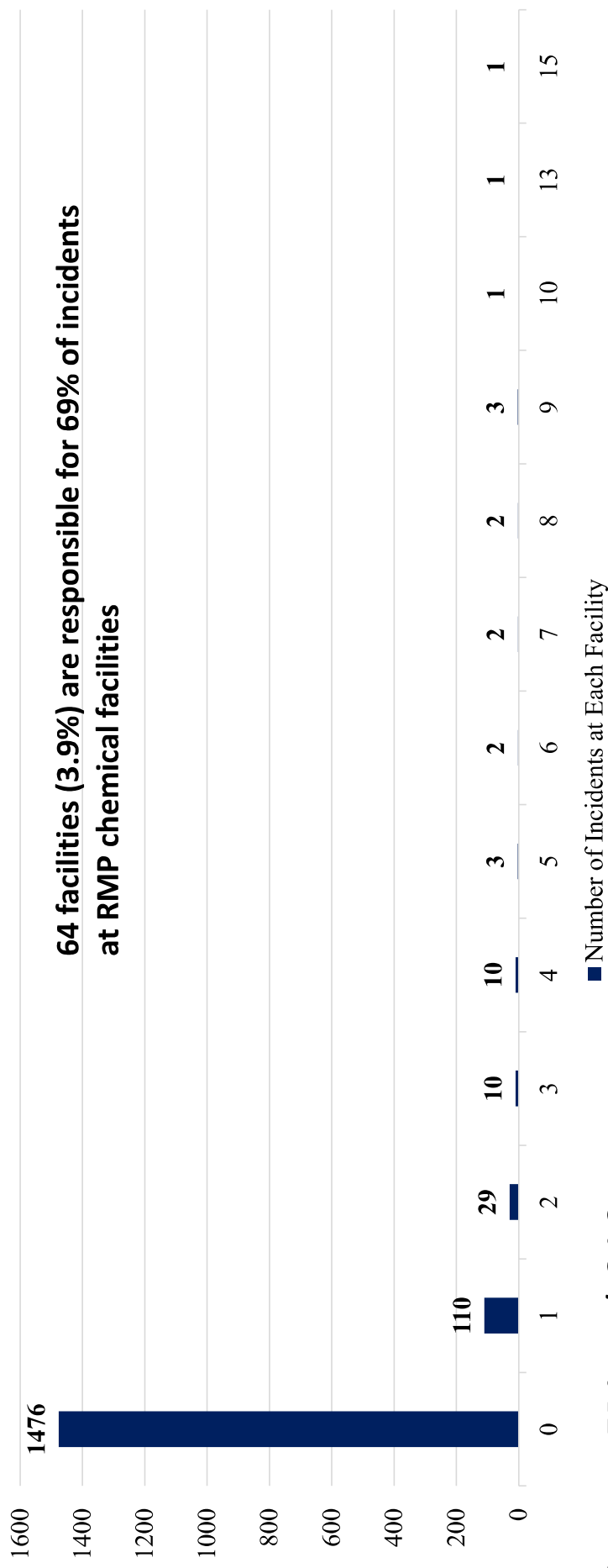
NAICS 325 Facilities



Source: EPA

Reportable incidents are rare and concentrated

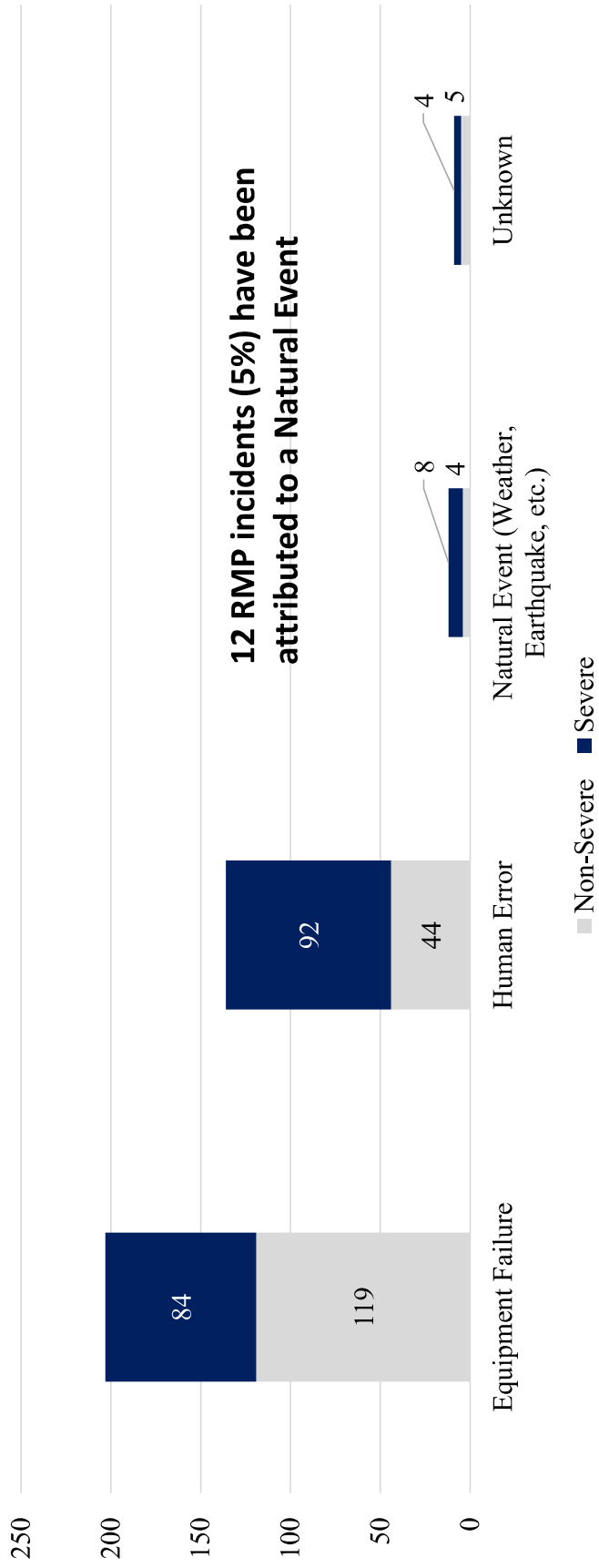
NAICS 325 Facilities



Source: EPA and GAO

Initiating Event (Chemical Industry)

NAICS 325 Facilities



Source: EPA

Costs attributed to the 2017 RMP Proposed Rulemaking

Cost Elements	Total Undiscounted	Total Discounted (3%)	Total Discounted (7%)	Annualized (3%)	Annualized (7%)
Rule Familiarization	(\$34.7)	(\$33.7)	\$32.4	(\$3.9)	(\$4.6)
Third-Party Audits	(\$98.4)	(\$83.6)	(\$69.1)	(\$9.8)	(\$9.8)
Incident Root Cause Analysis	(\$18.1)	(\$15.4)	(\$12.7)	(\$1.8)	(\$1.8)
STAA	(\$700.2)	(\$597.3)	(\$491.8)	(\$70.0)	(\$70.0)
Information Disclosure	(\$30.5)	(\$26.0)	(\$21.4)	(\$3.1)	(\$3.1)
Public Meetings	(\$2.8)	(\$2.4)	(\$2.0)	(\$0.28)	(\$0.28)
Total Avoided Cost*	(\$884.8)	(\$758.8)	(\$629.5)	(\$89.0)	(\$89.6)

Source: EPA (2019) Regulatory Impact Assessment