



DIRECTOR'S CORNER



Two issues that are commanding some attention at the national scene as well as at meetings are the upcoming EPA RMP resubmittal cycle and the reactive chemical issue. As you know, the RMPlan is due for the 5-year resubmittal to EPA on June 21, 2004. The EPA has published a fact sheet providing “generic” guidance on this resubmittal.

A complexity about this 2004 resubmittal is that the amendments proposed to the RMP in September 2003 have been finalized. These amendments have direct implication on the information to be included in the 2004 resubmittal. Specifically, the amendments:

- Require a correction to reportable information on chemical accidents be added to the RMP within six months of the date of the accident.
- Require that changes to emergency contact information be corrected within one month.
- Remove the requirement to include a brief description of the off-site consequence analysis in the RMP executive summary.
- Adds three RMP data elements.
- Expands the RMP*Submit format of the list of possible accident causes to include uncontrolled chemical reactions.

Once the June 21, 2004 anniversary for the RMPlan resubmittal is complete, the various regions of EPA are planning to begin auditing the RMPlans.

Discussions and activity related to the reactive chemical issue continues at meetings and conferences. Several organizations have joined together to establish the Reactive Chemical Hazard Alliance. The Mary Kay O'Connor Process Safety Center joined the Occupational Safety and Health Administration, the U.S. Environmental

Protection Agency, the American Chemistry Council, the Center for Chemical Process Safety, the Chlorine Institute, Inc., the National Association of Chemical Distributors; and the Synthetic Organic Chemical Manufacturers Association in establishing the alliance. Through this Alliance, the Signatories aim to (1) increase awareness of the need to identify and manage CRH among those who manufacture, distribute, use and store chemicals; (2) provide chemical reactivity hazards management information, methods and tools to a variety of audiences in meaningful and useful forms to those audiences; and (3) gain experience in the use of methods and tools to continuously improve identification and management of Chemical Reactive Hazards.

At the same time, work also continues on the Reactivity Management Roundtable (RMR). The RMR is an affiliation of organizations with the mission of cooperatively assimilating, implementing, maintaining, and updating best practices for managing chemical reactivity.

The 20th anniversary of Bhopal is coming up in December. The Center is working with the Indian Institute of Technology at Kanpur to sponsor a conference on the anniversary. I personally believe that the legacy of Bhopal has led to much progress in process safety and risk management. However, I also feel that we have a lot more to do as well. Has all that has resulted from the legacy of Bhopal reduced the frequency and severity of incidents? How can we answer this question? As we move into more and more globalization and other complexities what are the challenges we must address? Some of these challenges are wide-spread dissemination and sharing of lessons learned, risk migration because of globalization, changing workforce, and breakthroughs in emerging areas in process safety.

M. Sam Mannan
Spring 2004