As of June 1999, approximately 66,000 regulated facilities are required to submit a risk management plan to the EPA. This paper will discuss two ramifications of this ruling: first, an overview of a six-course program designed to assist small businesses in meeting this goal, and second, an approach to identifying the “chemical users”, versus chemical manufacturers, that this EPA regulation impacts.

In 1995, the Center for Chemical Process Safety (CCPS) a division of the American Institute of Chemical Engineers, undertook to provide small manufacturers and users of chemicals with a practical training course which would help them establish process safety programs. This is needed to satisfy the EPA Risk Management Program and the OSHA Process Safety Management Rule. This effort was partially funded by EPA, and relied upon the experience of small manufacturers. It also enjoyed the enthusiastic support of Florida’s State Emergency Response Committee (SERC). CCPS developed a six session instructional program and tested it, employing delivery techniques in four states. The program and the results, which were provided to more than 1,500 small business operators and regulators, will be reviewed.

As Mannan, O’Connor, and West opined in a recent paper entitled Accident History Database: An Opportunity, there are vast differences in the types of facilities that comprise the 66,000 facilities impacted by this requirement, with about half of these facilities not being classified as chemical manufacturers. This paper will also discuss an approach to identifying and increasing the awareness of those facilities that are not classified as chemical manufacturing plants.