

**EPN Testimony on EPA's Proposal,  
Accidental Release Prevention Requirements:  
Risk Management Programs Under the Clean Air Act;  
Common Sense Approach to Chemical Accident Prevention**

EPA-HQ-OLEM-2025-0313

March 10, 2026

Good afternoon.

My name is Marc Boom. I'm the Senior Director of Public Affairs at the Environmental Protection Network and I am commenting on behalf of our volunteers -- more than 750 former EPA staff -- in opposition to EPA's proposal to roll back key safety improvements to the Risk Management Program.

Many of our members helped design, implement, and enforce programs like RMP, so we understand both the intent of these protections and the consequences when they fail.

**By weakening these safety measures, the agency is making a policy judgment that the current level of chemical accidents is acceptable.**

But the data tells a different story.

RMP facilities report dozens of serious accidents —sometimes exceeding one hundred -- every year.

Communities that have experienced disasters like the release of toxic hydrogen sulfide in Deer Park, Texas, or the ethylene oxide explosion in Plaquemine, Louisiana, would likely disagree that the current level of safety is sufficient.

The 2024 improvements were developed after years of experience from EPA inspectors who identified gaps in how facilities analyze hazards and prevent catastrophic accidents, along with recommendations from the US Chemical Safety Board and GAO.

One improvement required the highest-risk facilities to conduct safer technology and alternatives analyses—looking at whether dangerous hazards can be reduced or eliminated by using safer processes or chemicals.

For example, many refineries still use extremely dangerous hydrofluoric acid in alkylation units. Yet, safer alternatives already exist, including newer ionic liquid processes now being deployed at Chevron's Salt Lake City refinery.

But this proposal would eliminate this requirement for existing facilities—where most of today's risk exists.

EPA's proposal appears motivated by concerns about reducing burden—but only for companies. It values reducing regulatory burden while assigning no value to preventing the costs and risks of chemical disasters for surrounding communities.

This proposal does not reduce the burden of chemical accidents—it simply shifts that burden onto victims.

Anyone who has seen the aftermath of these incidents understands the enormous effort required for emergency response, evacuations, cleanup, medical care, and community recovery—burdens far greater than the cost of prevention. These accidents already cost the public over \$500 million each year.

The rule also removes requirements to evaluate natural hazards like flooding, hurricanes and wildfires, as well as power loss incidents.

After Hurricane Ida, power, water, and steam losses at Shell Chemical's East Site in Norco, Louisiana, caused the release of hydrogen sulfide, benzene, butadiene, and other toxics into the surrounding community. With climate change driving more extreme weather and one-third of RMP facilities in areas vulnerable to climate impacts, planning for these hazards should be basic risk management.

EPA's mission remains to protect human health and the environment. Rolling back these protections means accepting today's level of chemical accidents as normal.

For workers, first responders, and the millions who live near RMP facilities, we should be reducing those risks—not accepting them.

I urge EPA to withdraw this proposal and maintain the stronger protections adopted in the 2024 rule.

Thank you for the opportunity to comment.