

INSIGHTS

Round Three: EPA's Latest Changes to the RMP Program – Initial Insights on Next Steps

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On March 1, 2024, EPA released the pre-publication final rule that makes a number of changes to the federal Risk Management Plan (RMP) program. The changes impact the scope of the Process Hazard Analysis (PHA), add third-party compliance audits and new employee participation requirements, and expand RMP program information sharing with the public and local emergency responders, among other requirements.

Bracewell environment, lands and resources team members Steven Cook and Whit Swift discussed the key elements of the final rule, EPA's justifications for the new requirements, and how the changes will impact companies subject to the RMP program.