

INSIGHTS

## Here We Go Again: EPA's Proposed Changes to the RMP Program

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On August 31, 2022, EPA published a proposed rule that would make a number of key changes to the federal Risk Management Plan (RMP) program. The proposed changes would impact the scope of the Process Hazard Analysis (PHA), third-party compliance audits, employee participation requirements, and information sharing with the public and local emergency responders, among other requirements. The proposal would bring back to the program, with some tweaks, a number of changes that EPA had adopted in the final days of the Obama administration that never became effective and were subsequently rescinded as part of a 2018-2019 reconsideration proceeding. The public comment period on the proposed rule ends on October 31, 2022.

Join Bracewell ELR team members [Steven Cook](#) and [Whit Swift](#) as they discuss key elements of the proposed rule and how the changes, if adopted, will impact companies subject to the RMP program.