



# At a Glance

## Why We Did This Review

While conducting work as part of an Office of Inspector General evaluation of a U.S. territory's implementation of its delegated Clean Air Act programs, we obtained and analyzed data on imports of hazardous substances to the United States. We obtained this data to help us determine whether facilities may have hazardous substances onsite in amounts that would require them to prepare risk management plans (RMPs) under the Clean Air Act Section 112(r) risk management program.

The work performed and disclosed in this report does not constitute an Office of Inspector General evaluation conducted in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States.

### **This report addresses the following EPA theme:**

- *Taking action on toxics and chemical safety.*

**For further information, contact our public affairs office at (202) 566-2391.**

**The full report is at:**  
[www.epa.gov/oig/reports/2014/20140428-14-N-0239.pdf](http://www.epa.gov/oig/reports/2014/20140428-14-N-0239.pdf)

## ***Chemical Import Data May Help EPA Identify Facilities That Need to File or Update Risk Management Plans***

### **What We Found**

Import data showed large shipments of anhydrous ammonia and chlorine to ports and facilities across the United States for which facilities may need to prepare an RMP or revise their RMPs. We identified four types of situations that could indicate facilities need to prepare or revise RMPs to reflect large amounts of regulated chemicals, as follows:

- Imports of chemicals above the reporting threshold to facilities with no RMP.
- Return shipments of large empty containers to facilities with no RMP.
- Imports of chemicals in amounts greater than the amount reported in the facility's RMP.
- Large shipments of regulated chemicals for which consignee information was not available.

**Given the potential public harm if an accidental release were to occur at a facility using or storing substances at or above threshold levels, the U.S. Environmental Protection Agency may want to use chemical import data to help determine whether facilities have a sufficient RMP in place.**

Additional analyses and/or onsite inspections are needed to determine whether the facilities described above are complying with risk management program requirements. Because of the sensitive nature of the information we developed, we will provide the agency with our detailed analyses separately from this report.

If facilities subject to the risk management program are not preparing RMPs, they may not be taking adequate measures to prevent accidents or mitigate the consequences of such accidents to the public. Further, without a plan detailing the chemicals located onsite and the risks associated with those chemicals, first responders may not have the information necessary to safely and effectively respond to a chemical accident.

We make no formal recommendations, but we encourage the agency to use the information we developed to determine whether the facilities we identified need to prepare or revise RMPs. We also encourage the agency to assess whether it should develop procedures for using import and export data as a method for identifying potential RMP non-filers.