



THE CHLORINE INSTITUTE

1300 Wilson Boulevard, Suite 525, Arlington, VA 22209

Phone: 703-894-4140 Fax: 703-894-4130

www.chlorineinstitute.org

U. S. Environmental Protection Agency,
Office of Land and Emergency Management
1200 Pennsylvania Avenue NW.
Mail Code 5104A
Washington, DC 20460

May 19, 2017

RE: Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act;
Further Delay of Effective Date, Docket Number: [EPA-HQ-OEM-2015-0725](#)

Dear Sir or Madam:

The Chlorine Institute ("CI" or the "Institute") is a 190 member, not-for-profit trade association of chlor-alkali producers worldwide, as well as packagers, distributors, users, and suppliers. The Institute's North American Producer members account for more than 93 percent of the total chlorine production capacity of the U.S., Canada, and Mexico. The Institute's mission chemicals, namely chlorine, sodium hydroxide and potassium hydroxide, and hydrogen chloride, are used throughout the U.S. economy and are paramount to the protection of public health.

With reference to the public comment period for the Risk Management Program ("RMP") rule, The Chlorine Institute supports the delay of implementation date until February 19, 2019.

Delaying the implementation date would allow EPA to continue its solicitation process on particular aspects of the rule, which EPA stated in the proposed delay notice is the next step. CI welcomes the opportunity and intends to submit comments.

Furthermore, with this delay, the current RMP rule still stands. Through compliance, training, development of best practices in safe handling and other voluntary efforts, CI supports regulations that reduce chemical releases. The best practices and chemical release prevention management systems in place at CI member facilities are extensive, often spanning across different locations throughout the U.S. in one organization. Considering EPA has announced it will continue to evaluate the rule, and given the ongoing litigation of the rule, it is not wise to require already-regulated facilities to adapt to a new rule, just to change the requirements shortly thereafter.

Thank you for the opportunity to comment on this rule and for your careful attention.

Best Regards,

Robyn Brooks
Senior Director - Health, Environment, Safety and Security