



RISK MANAGEMENT PLAN
SAFETY & EMERGENCY
RESPONSE CAPABILITIES





WHAT IS THE RISK MANAGEMENT PROGRAM?



What is RMP?

In June 1996, the Environmental Protection Agency (EPA) issued a new regulation called the Risk Management Program (RMP) rule. This regulation covers approximately 70,000 facilities in the United States that use, make, or store certain amounts of regulated chemicals. Each facility was required to make risk management information available to the EPA by June 1999 for use by local emergency responders, federal and state officials, and the public.

What is the Objective of RMP?

To reduce potential risks to the public by promoting the emergency preparedness of plants and their surrounding communities. The rule meets this purpose through three steps.

First, the RMP rule requires the identification of potential risks and encourages actions that reduce them. Second, the rule requires that plants have emergency response plans in place in case of an emergency. Finally, RMP requires that information about a plant's risk and emergency planning be submitted to the EPA. This data can then be used by the public and local emergency responders to better understand what emergencies could possibly happen and how they need to be prepared.

Reduce potential risks to the public by promoting the emergency preparedness of plants.





HOW ARE THE RISKS IDENTIFIED?



How is Brenntag Responding to RMP?

The three elements in the RMP rule are hazard assessment, emergency response program, and a release prevention program. Brenntag has been using these methods for many years and has now incorporated them into our RMP plan. In fact, while preparing our RMP plans, we took a closer look at our operations to make them even safer. Our goal in all of these efforts will continue to be preventing chemical emergencies.

How Are RMP Risks Identified?

When we talk about "risk management," we're talking specifically about:

- The hazards of the chemicals we repackage or store at our facilities,
- The possibility of these chemicals being released in an accident,

- The consequences of an accidental release of chemicals.

These risks are evaluated through accident scenarios that identify the potential offsite impacts of chemical releases. The EPA has specified two types of accident scenarios that companies must evaluate. The "worst-case" scenario is the hypothetical chemical release which could have the biggest impact on the surrounding community.

EPA hopes the "worst-case" scenarios will open up a dialogue between the community and the plant management which will improve emergency response capabilities. In reality, it is extremely unlikely that a "worst case" accident would ever occur because of

Hazard Assessment, emergency response program, and a release prevention program.





HOW DOES BRENNTAG MANAGE THE RISKS?



the plant's accident prevention programs. EPA also requires companies to identify "alternative" accident scenarios. These scenarios are more realistic than the "worst-case" scenarios and take into account our safety systems and our emergency response capabilities. These scenarios are more useful for emergency planning and response.

How Does Brenntag Manage This Risk?

At Brenntag, risk management is an integral part of our operations, from design and construction, through packaging and storage, to maintenance and training. At Brenntag...

- We have processes in place to ensure that we comply with federal, state and local regulations - as well as our own health, safety, and environmental standards.
- We provide the necessary resources -

people, equipment, and money - to eliminate or reduce hazards, thus preventing incidents from occurring in the first place.

- We have emergency response plans in place at all of our facilities.
- We have emergency response teams trained, equipped, and ready at all of our facilities.
- We help train local emergency responders in our communities.
- We routinely evaluate and improve our performance in these areas.

Risk management is an integral part of our operations.

