



**Testimony by
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Good afternoon,

My name is Darya Minovi, and I'm a policy analyst at the Center for Progressive Reform. Following my colleague David, I'd like to share three additional recommendations from our policy brief, Preventing Double Disasters.

First, EPA must expand community-level emergency response planning and communications capacity.

Fenceline communities, first responders, and workers do not have adequate access to information about the chemicals and hazards at local facilities. The CSB and U.S. Fire Administration have both emphasized the need for first responders to have access to this information, yet, as highlighted by the GAO, lack of data sharing continues to be a major threat to safety during chemical disasters.

RMP facilities must be required to report critical information, such as hazard reduction and elimination assessments, and facility plans, to EPA, and this information must be accessible to those who need it. Facilities should also be required to include updated and publicly available information on chemical hazards in their RMP plans. And finally, EPA should require facilities to undertake emergency response exercises on clear, regular, and enforceable timetables in collaboration with first responders.

Second, we must formally engage workers and their representatives in facility preparedness and response planning.

RMP reforms must include greater engagement of workers and their representatives, both in RMP plan development and in trainings related to incident prevention, response, and investigation. Emergency exercises should include information and procedures tailored to the natural disaster risks at a given facility. For example, while the emergency response plan at the Arkema facility in Crosby, Texas included preparatory action for severe weather, the plan did not identify the possibility of flooding that could lead to loss of power, despite several past instances of flooding at the facility.

In coordination with OSHA, EPA should also develop resources for RMP facility workers on climate and natural disaster risks and how they impact chemical disaster processes and worker health and safety. Workers also need mechanisms to anonymously report safety hazards and near-miss incidents with anti-retaliation protections.



Finally, EPA must require facilities to conduct real-time fenceline monitoring, share data with the public, and provide timely community alerts.

Lack of monitoring data and outdated alert systems can contribute to delayed response and harm during a disaster. For example, following the 2012 fire at the Chevron refinery in Richmond, California, the county's Community Warning System came hours after the fire began, which contributed to many residents being unnecessarily exposed to toxic pollutants.

EPA must require RMP facilities to install and maintain real-time fenceline air monitors, particularly for facilities with past incident records and the greatest hazards. Data and response actions should be accessible to the public online, and in the event of a disaster, EPA should ensure there are prompt, multilingual community alerts.

As the climate crisis worsens, the risk of natech incidents will only increase. With coordinated planning, data transparency, and swift response, EPA can ensure that fenceline communities, first responders, and workers don't bear the cost.

Thank you for your time.