

# Practical Application of EPCRA

LEPC 201 - Beyond the Basics

# Local Officials Guide



## Local Elected and Appointed Officials Guide:

Roles and Resources in Emergency Management

September 2022



FEMA

### Key Message:

equitable and comprehensive disaster preparedness, response and recovery is a civil right

From planning ... to responding and recovering ... senior officials have the responsibility to develop and maintain partnerships with those most affected by disasters.

[S]ervices and activities provided by state and local governments, as well as those provided through third parties ... , must be accessible ...

A “One-Size-Fits-All” approach to emergency management planning ... and information dissemination does not work ....

- Establishing a core planning team with ... representatives from among people with access and functional needs;
- Integrating people with access and functional needs through public outreach in local and regional plans, trainings and exercises;

# The Role of LEPCs

## Collect Risk Information

Tier II Reports

TRI Reports

§303(d)(3) Requests

Risk Management Plans (RMP)

Invite facilities and public to discuss capabilities,  
expectations & plans

# Look at the Data

Download and use CAMEO

Get the RMP reports for facilities in your area.

Tier II information from facilities of interest.

Look at TRI data

Use other State Statutory Authorities

*There should never be a “mystery” facility in your area.*

# EPCRA §303

**EPCRA § 303(d)(3) states, “Upon request from the emergency planning committee, the owner or operator of the facility shall promptly provide information to [the LEPC] necessary for developing and implementing the emergency plan.”**

# Tier II “information”

EPCRA § 312(e)(1) requires the facility to provide Tier II information to an LEPC upon request.

30 days to respond & default “0” threshold

Tier II information includes:

chemical name

an estimate of the maximum and average daily amounts present

a description of the manner of storage

the location at the facility

Not limited to the Tier II form

# **Risk Management Plan (RMP)**

**Clean Air Act of 1990, Section 112(r)**

Chemical accident prevention at facilities for substances that pose the *greatest risk of harm* from accidental releases

## **Toxic Substances**

Thresholds range from 500 to 20,000 pounds

## **Flammable Substances**

Threshold is 10,000 pounds

Emergency planning/response coordination

# HOW PREPARED ARE RMP FACILITIES?

An historical EPA Review showed:

50% had no emergency response capabilities

Their plan was calling “911”

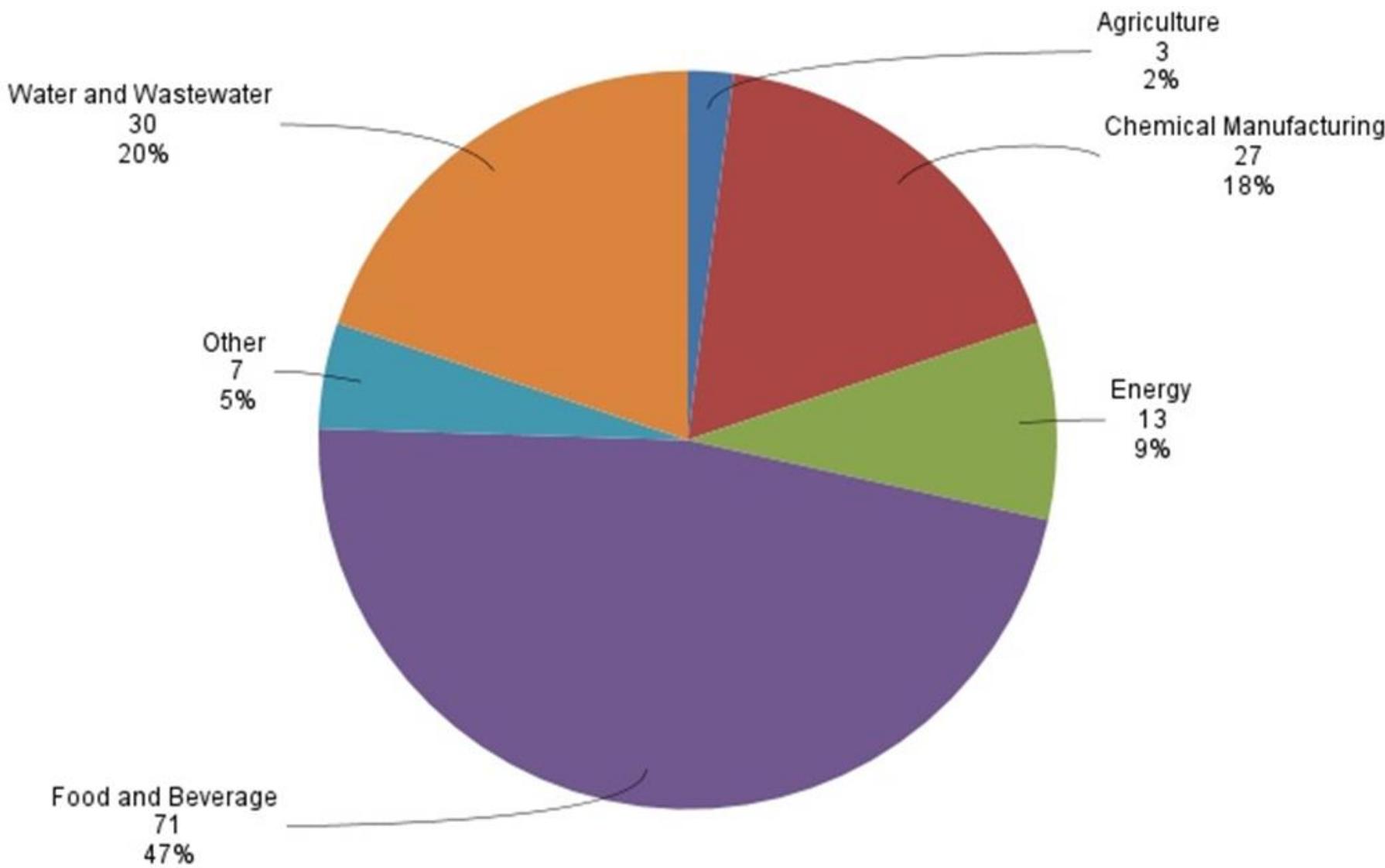
Most indicated in their RMP that they had a plan and had coordinated – “magical thinking” they think that a Tier II is coordination

The issue for LEP Cs is what “action” will these facilities take?

The regulations require coordination and cooperation

ASTM standard E3241–20 defines what’s expected

## Arkansas State Facilities by Industry



Current (Active) Facilities: 149

Data displayed is accurate as of 12:00 AM (EST) Monday, November 03, 2025

## Arkansas State Facilities by Top Chemicals

### Arkansas State Top 10 Flammable Chemicals by Quantity

Chemical Name	Quantity (tons)	Active Facilities*	Processes
Propane	8,588	7	13
Flammable Mixture	6,563	4	13
Ethyl ether [Ethane, 1,1'-oxybis-]	4,000	1	8
Butane	1,635	6	12
Pentane	691	2	9
Trifluorochloroethylene [Ethene, chlorotrifluoro-]	625	1	5
Propylene [1-Propene]	525	2	2
Isobutane [Propane, 2-methyl]	483	3	5
Vinylidene chloride [Ethene, 1,1-dichloro-]	210	1	7
Acetaldehyde	205	2	5

\*A facility may report more than one process and be included in the counts for more than one chemical.

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## Arkansas State Facilities by Top Chemicals

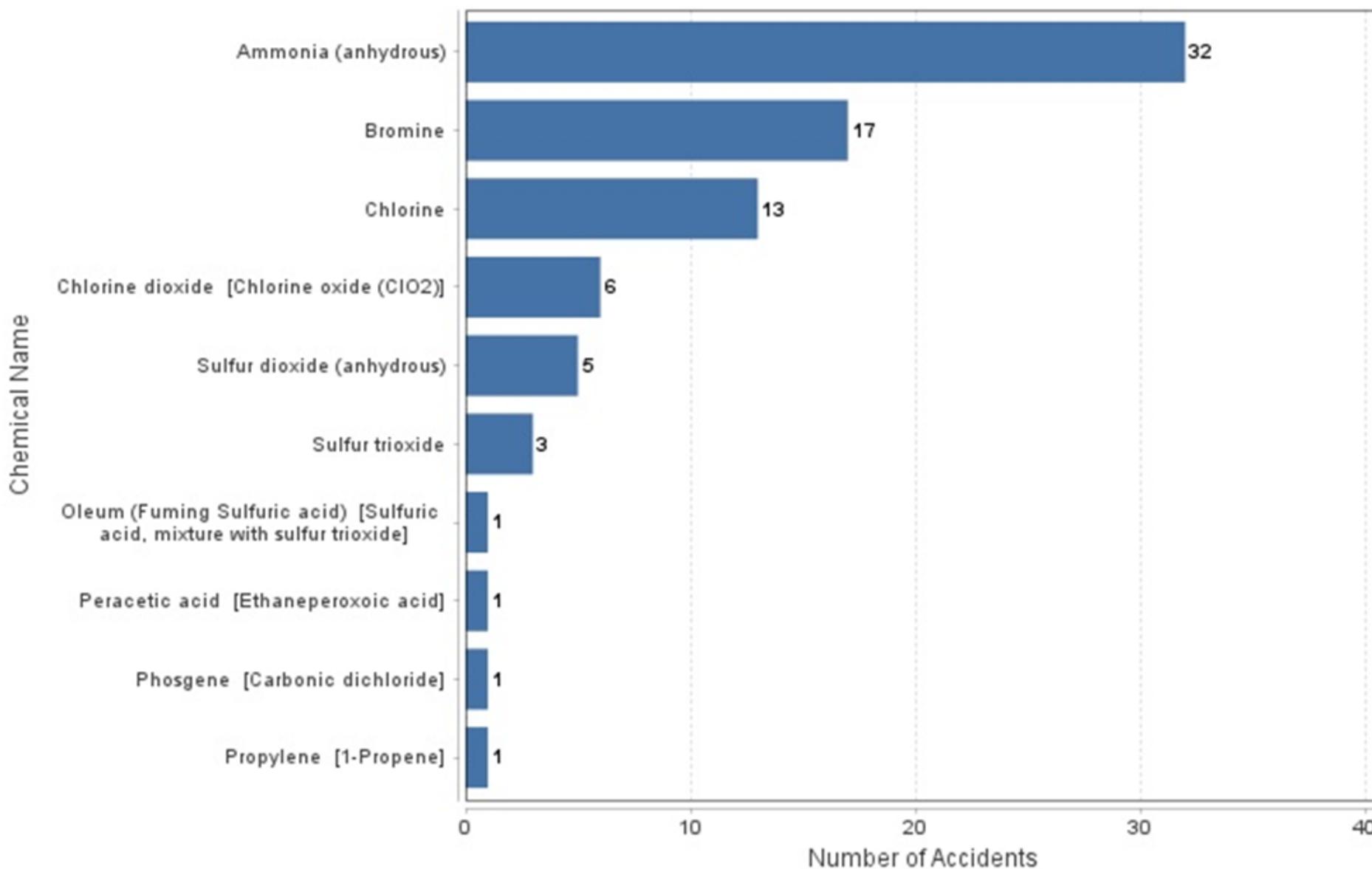
### Arkansas State Top 10 Toxic Chemicals by Quantity

Chemical Name	Quantity (tons)	Active Facilities <sup>*</sup>	Processes
Ammonia (anhydrous)	32,989	83	89
Chlorine	8,162	44	56
Bromine	6,275	9	19
Formaldehyde (solution)	1,507	4	14
Oleum (Fuming Sulfuric acid) [Sulfuric acid, mixture with sulfur trioxide]	643	4	5
Toluene diisocyanate (unspecified isomer) [Benzene, 1,3-diisocyanatomethyl-]	490	2	9
Epichlorohydrin [Oxirane, (chloromethyl)-]	425	2	9
Sulfur trioxide	422	2	2
Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]	410	3	10
Chloroform [Methane, trichloro-]	405	1	9

<sup>\*</sup>A facility may report more than one process and be included in the counts for more than one chemical.

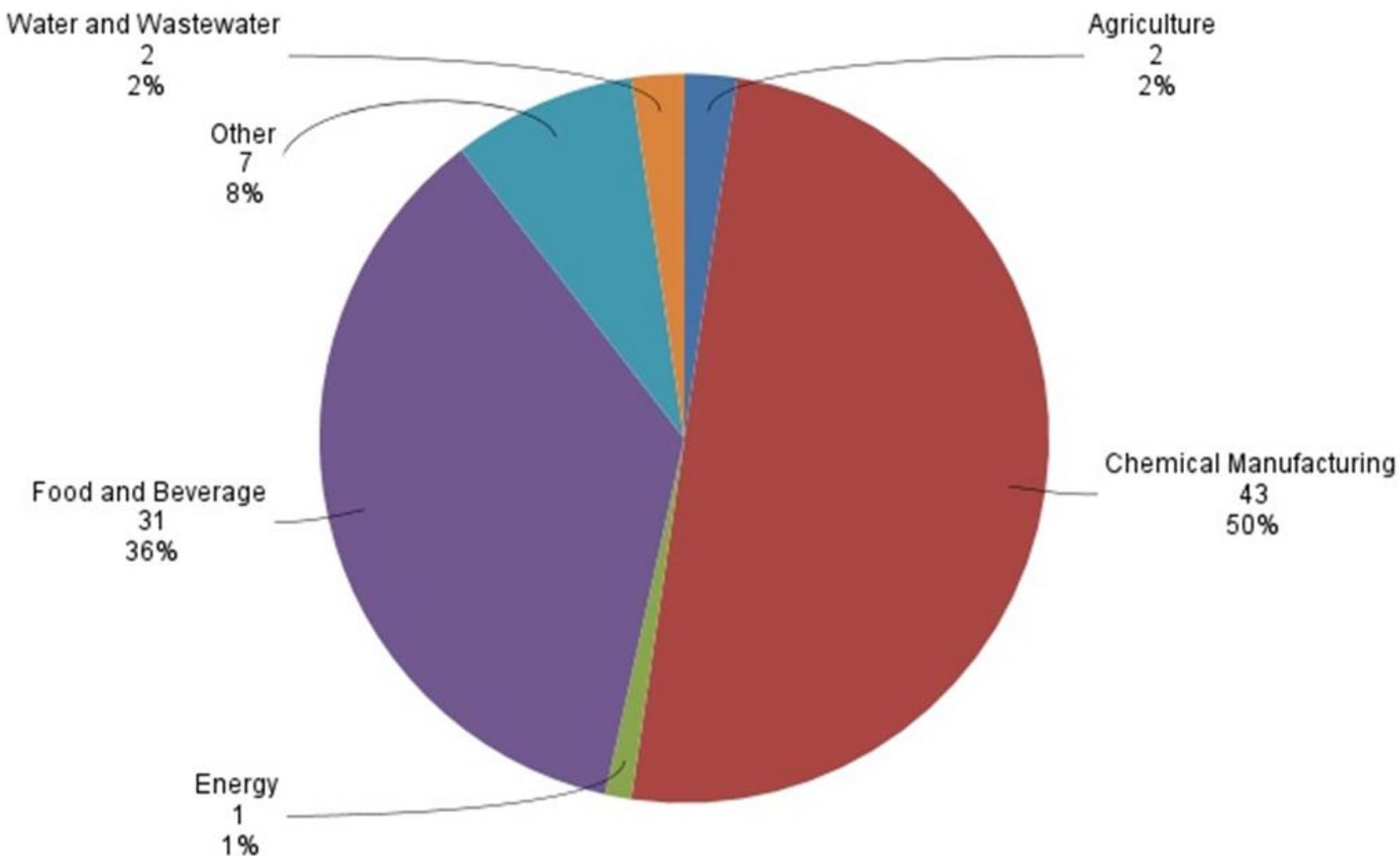
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## Arkansas State Accident History by Chemical Years 2008 to 2023



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## Arkansas State Accident History by Industry Years 2008 to 2023



Total Accidents: 86

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**Let me know if you want to be on the NASTTPO email list or want documents.**