

Regulation 5.15, Chemical Accident Prevention Provisions, Version 4, Advanced Notice of Proposed Rulemaking Appendix A: Costs by Rule Provision

February 21, 2020

Note

Costs were calculated using information on RMP facilities in Louisville, below, plus cost information from the RMP Amendments Regulatory Impact Assessment, available at <https://www.regulations.gov/document?D=EPA-HQ-OEM-2015-0725-0734>

PROCESS TYPE	SIZE	PROGRAM LEVEL	NO. OF FACILITIES	FULL TIME EMPLOYEES
Complex	Large	3	1	350
Complex	Medium	3	8	855
Simple	Large	3	3	2022
Simple	Medium	3	4	648
Simple	Medium	2	1	37
Simple	Small	2	2	16

One-Time Costs (Rule Familiarization)

FACILITY TYPE	PROGRAM LEVEL	COST PER FACILITY	NUMBER OF FACILITIES	FREQUENCY	TOTAL ANNUAL COST
Complex	1/2	\$ 400.48	0	One-time	\$ -
	3	\$ 20,554.13	9	One-time	\$ 184,987.17
Simple	All	\$ 308.60	10	One-time	\$ 3,086.00
				Total	\$ 188,073.20

Third Party Audits

FACILITY TYPE	FACILITY SIZE	COST PER FACILITY	NUMBER OF FACILITIES	ANNUAL FREQUENCY	TOTAL ANNUAL COST
Complex	Small	\$ 87,438.00	0	0.012242*	\$ -
	Medium	\$ 92,572.00	8	0.021556	\$ 15,963.60
	Large	\$ 95,537.00	1	0.103171	\$ 9,856.60
Simple	Small	\$ 35,751.00	2	0.003253	\$ 232.58
	Medium	\$ 39,607.00	5	0.009703	\$ 1,921.49
	Large	\$ 41,677.00	3	0.020951	\$ 2,619.56
				Total	\$ 30,593.83

Incident Investigation

(Root Cause Analysis and Near Miss Investigation)

FACILITY TYPE	PROGRAM LEVEL	COST PER FACILITY	NUMBER OF FACILITIES	ANNUAL FREQUENCY*	TOTAL ANNUAL COST
Complex	2	\$ 11,135.00	0	0	\$ -
	3	\$ 11,135.00	9	0.091	\$ 9,153.28
Simple	2	\$ 1,804.00	3	0.006	\$ 33.29
	3	\$ 1,804.00	7	0.028	\$ 354.29
				Total	\$ 9,540.86

Emergency Response Coordination & Notification

COST TYPE	FACILITY TYPE	COST PER FACILITY	NUMBER OF FACILITIES	ANNUAL FREQUENCY	TOTAL ANNUAL COST
Emergency Notification Drills	Complex	\$ 152.00	9	1	\$ 1,368.00
	Simple	\$ 111.00	10	1	\$ 1,110.00
Emergency Response Coordination	Complex	\$ 4,340.00	9	1	\$ 39,060.00
	Simple	\$ 890.00	10	1	\$ 8,900.00
				Total	\$ 50,438.00

Emergency Response Exercises

REQUIREMENT	FACILITY TYPE	FACILITY SIZE	COST PER FACILITY	NUMBER OF FACILITIES	ANNUAL FREQUENCY	TOTAL ANNUAL COST
Field Exercises	Simple	Medium	\$ 14,142.00	2	0.1	\$ 2,828.40
		Large	\$ 19,204.00	2	0.1	\$ 3,840.80
	Complex	Medium	\$ 17,556.00	6	0.1	\$ 10,533.60
		Large	\$ 35,565.00	1	0.1	\$ 3,556.50
Table Top Exercises	Simple	Medium	\$ 6,650.00	2	0.33	\$ 4,389.00
		Large	\$ 12,498.00	2	0.33	\$ 8,248.68
	Complex	Medium	\$ 8,399.00	6	0.33	\$ 16,630.02
		Large	\$ 21,277.00	1	0.33	\$ 7,021.41
					Total	\$ 57,048.41

Safer Technology Alternatives Analysis (STAA)

COST TYPE	FACILITY SIZE	COST PER FACILITY	NUMBER OF FACILITIES	ANNUAL FREQUENCY	TOTAL ANNUAL COST
Initial analysis	Small/ Medium	\$ 9,795.00	8	0.2	\$ 15,672.00
	Large	\$ 56,006.00	1	0.2	\$ 11,201.20
Practicability	Small/ Medium	\$ 27,607.00	8	0.2	\$ 44,171.20
	Large	\$ 1,380,000.00	1	0.2	\$ 276,000.00
				Total	\$ 347,044.40

Public Meetings

FACILITY TYPE	COST PER FACILITY	NUMBER OF FACILITIES	ANNUAL FREQUENCY*	TOTAL ANNUAL COST
Complex	\$ 3,717.00	9	0.042	\$ 1,423.09
Simple	\$ 1,731.00	10	0.007	\$ 131.57
			Total	\$ 1,554.66

Information Availability

	FACILITY SIZE	COST PER FACILITY	NUMBER OF FACILITIES	FREQUENCY	TOTAL COST
Complex	Small	\$ 352.00	0	0.5	\$ -
	Medium	\$ 4,820.00	8	0.5	\$ 19,280.00
	Large	\$ 4,820.00	1	0.5	\$ 2,410.00
Simple	Small	\$ 133.00	2	0.5	\$ 133.00
	Medium	\$ 133.00	5	0.5	\$ 332.50
	Large	\$ 133.00	3	0.5	\$ 199.50
				Total	\$ 22,355.00