
**American Fuel & Petrochemical Manufacturers' Public Statement on
EPA's Proposed Rule *Accidental Release Prevention
Requirements: Risk Management Programs Under the
Clean Air Act; Common Sense Approach to Chemical
Accident Prevention*, 91 Fed. Reg. 8970 (Feb. 24, 2026)**

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People assume “*regulatory reform*” means doing less. Today’s proposal shows it can mean doing better.

EPA’s RMP proposal is not about weakening safety—it’s about strengthening it by focusing on what actually works. This rule recognizes that effective chemical safety comes from alignment, clarity, and proven systems.

EPA deserves credit for taking a data-driven look at how the RMP functions in practice and recalibrating the program where improvements are needed.

This rule represents a long overdue realignment of EPA’s RMP with OSHA’s PSM standard, consistent with Congress’s direction that the two programs be coordinated and not duplicative. When RMP and PSM are aligned, facilities can operate an integrated prevention system that protects workers inside the fence line and communities outside it.

Take STAA. EPA appropriately proposes to retain STAA where it is most effective - for new facilities and newly constructed processes, when design decisions are still flexible. The proposal rescinds mandatory STAA requirements for existing facilities, where risks are already comprehensively evaluated through PHAs, incident investigations, and management-of-change processes. That is not a retreat from safety - it is a recognition that mature facilities already apply layered, risk-based systems designed to protect employees, neighbors, and first responders.

Similarly, EPA correctly acknowledges that automatic third-party audit mandates - untethered from actual performance issues -can divert attention from real risks. By refocusing these audits on circumstances where there is a demonstrated need, and relying on targeted enforcement where problems exist, the Agency strengthens accountability while ensuring that resources remain focused on preventing incidents that could affect workers and surrounding communities.

By rescinding provisions that expanded documentation and historical gap analysis obligations beyond OSHA's PSM framework, EPA restores clarity and consistency. Let me be clear - Facilities remain fully responsible for ensuring safe design, operation, and maintenance of equipment—but the rule appropriately avoids converting RMP into a retrospective design review exercise.

Across these examples, the theme is consistent: this proposal removes requirements that did not demonstrably improve safety, while preserving - and reinforcing - the core elements that do. Robust hazard analyses, mechanical integrity, employee involvement, emergency preparedness, and coordination with local responders remain the backbone of the program.

In short, this proposal is not a rollback. It is a course correction grounded in experience, evidence, and statutory intent. It strengthens chemical safety by focusing regulatory attention where it belongs - on managing real risk, not managing paperwork.

This is what smart; effective regulatory reform looks like.

Thank you.