



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460  
Mail Code 5104

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

June 1, 2015

Mr. Chris Jahn  
President  
The Fertilizer Institute  
425 Third Street, SW, Suite 950  
Washington, DC 20024

Dear Mr. Jahn,

The EPA Office of Emergency Management (OEM) is pleased to have worked with The Fertilizer Institute (TFI) on its recent update to the *myRMP* suite of guidance materials, which provide information about compliance with the EPA Risk Management Program tailored to ammonia fertilizer facilities. OEM appreciates TFI's decision to involve EPA in the update of these materials and to continue to make them available to the regulated community and members of the public. During the update process, we reviewed the *myRMP* materials, provided our comments regarding the requirements of the Risk Management Program and worked with TFI to address our comments and concerns.

In addition to a comprehensive update to existing *myRMP* guidance materials, the recent update provides a new interactive hazard review approach for RMP-regulated facilities in the ammonia fertilizer industry, and incorporates additional new materials for fertilizer facilities subject to RMP Program 3 requirements. EPA believes these improvements have enhanced an already very useful set of regulatory guidance materials, and will continue to make the *myRMP* materials a viable compliance resource for the regulated community.

As we noted with the original version of these materials, while the statutory provisions and EPA regulations described in the updated *myRMP* materials describe legally binding requirements, the discussion and advice contained therein do not replace the legal requirements. Users of the *myRMP* materials should also recognize that their approaches for compliance may need to differ from those described in the *myRMP* materials to account for any special circumstances present at their source. OEM acknowledges that TFI has made every effort to ensure the accuracy of the discussion in these materials; however, the obligations of the regulated community are ultimately determined by statutes, regulations, or other legally binding requirements. Therefore, in the event of a conflict between the *myRMP* materials and such requirements, users should follow the legal requirements. To resolve any questions about the requirements of the Risk Management Program, users should refer to the Clean Air Act and EPA's regulations or contact a Risk Management Program implementing agency (i.e., local, State, EPA Region, or EPA Headquarters official) and may also want to consult with counsel. Persons with questions about the *myRMP* materials should contact TFI, who is the author of these materials.

The TFI *myRMP* guidance materials provide practical advice, insights, and guidelines for clearer understanding of the Risk Management Program and its implementation, particularly as applied to facilities in the ammonia fertilizer industry. OEM believes that these materials outline an approach to compliance that will be very helpful to many fertilizer facilities covered by the Risk Management Program.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. Craig Matthiessen", with a long horizontal flourish extending to the right.

R. Craig Matthiessen

Director

Regulations Implementation Division

Office of Emergency Management