



10/24/19

**Clean Air Council's Statement to the Office of Management and Business
Regarding the Proposed Rollback of the Chemical Disaster Rule**

Clean Air Council is a nonprofit environmental and health organization with thousands of members across Pennsylvania and the Mid-Atlantic. We are headquartered in Philadelphia, Pennsylvania, and have been working to protect everyone's right to clean air and healthy environment for over fifty years. Clean Air Council's home city of Philadelphia is also home to numerous industries that are regulated under the Chemical Disaster Rule, and our local communities, especially the low income communities situated closest to most of the industry, rely on the Rule's protections.

The proposed rollback of the Chemical Disaster Rule is particularly relevant right now to Clean Air Council and communities we advocate for because of the recent explosion at the Philadelphia Energy Solutions Refinery (PES). Just last week, the U.S. Chemical Safety and Hazard Investigation Board released its findings that over 600,000 pounds of toxic chemicals were released during the explosions, including 5,000 pounds of deadly hydrofluoric acid (HF). Our city narrowly missed catastrophe.

For Clean Air Council, this is not an abstraction. Our members, our employees, heard the 4:00 AM explosions. We saw the massive plumes of smoke. Had the cloud of HF stayed closer to the ground instead of being lofted into the atmosphere, we could have been in its impact zone. But for the training and fast action of a PES employee who deinventoried the majority of the HF, and the quick coordination with the Philadelphia Fire Department, countless lives of Philadelphia residents and workers, including Clean Air Council members and employees, could have been lost.

The proposed rollback of the Chemical Disaster Rule would result in *less* training and *less* coordination with local first responders. Our communities simply cannot afford that. The rollback would eliminate the requirement that industry consider safer alternatives to dangerous chemicals like HF. Especially in light of the near miss at PES, ignoring safer alternatives is flirting with disaster. We need more, not less, focus on prevention. PES and other industries have been cited for numerous violations over the years and yet explosions, fires, and releases keep happening. Enforcement is crucial, but is not enough. Clean Air Council urges the OMB to advise EPA not to undo critical protections of the Chemical Disaster Rule.