



Risk Management Plan (RMP) Program Fee Guidance

Fee Information

Facilities subject to the Risk Management Plan (RMP) Program are required to pay an annual fee to Ohio EPA. The fee for each facility is a \$50 registration fee together with any of the following applicable fees:

- (1.) \$65 for propane if propane is the only RMP regulated substance at the facility over the threshold quantity;
- (2.) \$65 if a covered process includes anhydrous ammonia that is sold for use as an agricultural nutrient and is onsite over the threshold quantity. If the anhydrous ammonia is used or sold for use other than as an agricultural nutrient, then the fee assessed will be \$200. For example, if your facility sells anhydrous ammonia as an agricultural nutrient but also uses it in the production of nitric acid, the fee would be \$200 for that substance;
- (3.) \$200 for each RMP regulated substance over the threshold quantity.

Facilities that meet the definition of a “small business” (independently owned and operated with less than 100 full-time employees) are exempt from fees. If you are not sure whether your facility meets this definition, call the Small Business Assistance Program at (614)644-4830.

Flammable Mixtures

If the subject process has a flammable mixture, each regulated flammable component of that mixture listed in the RMP is considered a regulated substance. However, if a flammable component in the mixture is less than 1% by weight, then this regulated substance will not be included in the fee. For example, if a flammable mixture contains both methane and hydrogen, and methane is in the process at less than 1% by weight, a fee will only be assessed for hydrogen.

Fee Due Dates

For the year 1999, fees were due to Ohio EPA Division of Air Pollution Control (DAPC), along with RMP submission, January 3, 2000. This deadline was only for facilities which were required to submit their RMP to U.S. EPA by June 21, 1999, as fees are assessed for regulated substances listed in that plan.

Beginning in 2000, fees are based on regulated substances listed in the latest RMP and will be due by September 1 of the current year. Therefore, facilities that became subject to the RMP requirements subsequent to June 21, 1999, will not be required to pay fees until the next billing cycle (September 1, 2000). Fees for 2001 will be based on substances listed in the RMP in the timeframe

of September 2, 2000 through September 1, 2001 and so on. Invoices will be mailed to facilities in August. If a facility removes a regulated substance but does not revise their RMP before September 1 of that year, the facility will owe a fee for that regulated substance.

Example 1:

A facility that has 2000 pounds of chlorine onsite has decided to increase their inventory by adding another 1-ton cylinder in July 2000. Since both of these cylinders will be side-by-side, it is considered one process and the facility is now subject to the RMP regulation. This facility will not owe a fee until September 1, 2000.

Example 2:

A facility that has 15,000 pounds of anhydrous ammonia has lowered their inventory to below 10,000 pounds (below threshold quantity). However, although the facility physically removed the substance on August 1, 2000, a revised RMP (or withdrawal of RMP) was not submitted until October 2000. This facility will owe a fee on September 1, 2000 for anhydrous ammonia.

Summary of Fee Due Dates

Date	Based on . . .
January 3, 2000	Regulated substances listed in RMP required to be submitted to U.S. EPA by June 21, 1999. If a facility was required to submit an RMP to U.S. EPA by this date but did not meet the deadline, the facility will still be required to pay fees to Ohio EPA for this RMP. However, if a facility was not required to submit a plan by the June 21, 1999 deadline, then a fee is not required for 1999.
September 1, 2000	Regulated substances listed in RMP as of September 1, 2000. If a facility removes a regulated substance and revises their RMP before September 1, 2000, the facility will not be required to pay a fee for that substance.
September 1, 2001	Regulated substances listed in RMP as of September 1, 2001. If a facility removes a regulated substance and revises their RMP before September 1, 2001, the facility will not be required to pay a fee for that substance.
