

COUNTY OF SACRAMENTO
Environmental Management
Department (EMD)

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EMD is the Certified Unified Program Agency (CUPA) for Sacramento County including its incorporated cities. The Sacramento County CUPA Program is administered by the EMD Environmental Compliance Division.

DISCLAIMER - The information contained in this Compliance Assistance Bulletin is based upon the statutes and regulations and is intended to provide a basic overview to help achieve compliance. This document does not replace or supersede relevant statutes and regulations and is not intended as legal advice. All interested parties should monitor changes to relevant statutes and regulations for updates.

NOTE - Failure to complete any of the steps outlined in 19 CCR Chapter 4.5 may result in enforcement action by the Environmental Management Department (EMD).

FOR MORE INFORMATION

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**COMPLIANCE
ASSISTANCE
BULLETIN**

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CALARP FALL UPDATE



**ENVIRONMENTAL MANAGEMENT
DEPARTMENT (EMD)**

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INTRODUCTION

The purpose of this bulletin is to inform California Accidental Release Prevention (CalARP) Program facilities of requirements that must be met when a facility undergoes a covered process modification or major change.

DEFINITIONS (California Code of Regulations (CCR), Title 19)

Section 2735.3 (v) Major change means introduction of a new process, process equipment, or regulated substance, an alteration of process chemistry that results in any change to safe operating limits, or other alteration that introduces a new hazard.

Section 2735.3 (z) Modified stationary source means a stationary source which has undergone an addition or change which qualifies as a “major change” as defined in (v) of this section.

Section 2745.11 (a) Covered Process Modification means the modification may result in a significant increase in either:

- The amount of regulated substances handled at the stationary source; or
- The risk of handling a regulated substance

REQUIREMENTS FOR COVERED PROCESS MODIFICATIONS

All stationary sources must notify the Environmental Management Department (EMD) in writing at least 5 calendar days before implementing any modifications to a covered process. As part of the modification process the stationary source must do the following:

- Consult with EMD to determine whether the RMP should be revised/ updated
- Establish procedures to manage the proposed modification, which shall be substantially similar to the procedures outlined in Sections 2760.6 and 2760.7 of the CalARP Program regulations
- Notify EMD that the procedures above have been established

REQUIREMENTS FOR MAJOR CHANGES

PROGRAM LEVEL 2 FACILITIES

UPDATE INFORMATION:	<ul style="list-style-type: none">➤ Update the safety information if the major change makes the information inaccurate➤ Update the hazard review whenever a major change in a process takes place➤ Resolve all issues identified in the hazard review before startup of the changed process➤ Consult with EMD on the hazard review methodology
UPDATE OPERATING PROCEDURES IF:	A change in your process alters the steps needed to operate safely
EMPLOYEES AFFECTED BY THE CHANGE MUST:	Be trained on revised operating procedures prior to startup of the changed process

PROGRAM LEVEL 3 FACILITIES

MANAGEMENT OF CHANGE (MOC) PROCEDURES	Must address: <ul style="list-style-type: none">➤ Technical basis for the change➤ Impact on safety and health➤ Modifications to operating procedures➤ Necessary time for the change➤ Authorization requirements for proposed change
UPDATE INFORMATION:	Update Process Safety Information (PSI) when a change covered by MOC procedures results in a change to any PSI
UPDATE OPERATING PROCEDURES IF:	A change covered by MOC procedures results in a change in any operating procedure
EMPLOYEES AFFECTED BY THE CHANGE MUST:	<ul style="list-style-type: none">➤ Be informed of the change before startup➤ Trained in the change before startup
IF PSI IS UPDATED: PRE-STARTUP SAFETY REVIEW (PSSR) PROCEDURES	Must confirm: <ul style="list-style-type: none">➤ Construction/ equipment is in accordance with design specifications➤ Safety, operating, maintenance, and emergency procedures are in place and adequate MOC procedures are complete➤ Training of employees has been completed