

June 12, 2015

IMPORTANT NOTICE:

CALARP REGULATORY UPDATE

The Sacramento County Environmental Management Department (EMD) is the local Certified Unified Program Agency (CUPA) and is responsible as the Administering Agency (AA) for enforcement of the California Accidental Release Prevention (CalARP) Program within Sacramento County. The CalARP Program regulations were recently revised and the revisions took effect starting January 1, 2015. Many of the changes were administrative (e.g. changing California Emergency Management Agency (EMA) to California Office of Emergency Services (OES), defining Cal OES, Cal OSHA, new stationary source, revalidation, etc.). However, some changes were more substantive. Brief descriptions of some of the major changes are listed below.

Code Section	Change
	Developed toxic endpoints for table 3 chemicals and listed the toxic endpoints in Appendix A.
Section 2750.7(a)	Requires the stationary source to “document” the review and update of the offsite consequence analyses.
Program Level 2 Changes	
Section 2755.2(C)	Added the requirement for Program 2 Hazard Review to be performed by a team familiar with the process operations and include at least one employee who has experience and knowledge specific to the process being reviewed.
Section 2755.2(e)	Establishes a timeline for resolutions of problems identified in a hazard review.
Section 2755.2(g)	Revalidation of hazard reviews can only be done once before a new full hazard review is performed.
Section 2755.2(h)	Documentation of the hazard review and associated documents are to be retained for the life of the process.
Section 2755.3(c)	Sets a requirement for developing and updating operating procedures to reflect current practice(s).
Section 2755.4(e)	Requires the documentation of training for employees.
Section 2755.5(a)	Requires that maintenance procedures be written.
Section 2755.5(c)	Changes the requirement where the owner and operator is now responsible and documents to ensure that a contractor has employees trained to perform the maintenance as required by this sections.
Section 2755.6(d)	Sets a timeline when compliance audit findings are to be resolved.
Section 2755.7(d)	Sets a timeline when incident investigation findings are to be resolved.

Program Level 3 Changes	
Section 2760.1(b)(4)	Process safety information must include reactivity data “and compatibility data during handling, use and application at the stationary source.
Section 2760.2(e)	Sets a timeline when process hazard analyses findings are to be resolved.
Section 2760.6(b)(3)	Requires management of change requirements when modifications or development of new operating and maintenance procedures.
Section 2760.6(e)	Requires the updating of written procedures to maintain the ongoing integrity of process equipment.
Section 2760.8(c)	Requires additional information to be included in compliance audits reports, which will be available to the UPA.
Section 2760.8(d)	Sets a timeline when compliance audits findings are to be resolved.
Section 2760.9(e)	Sets a timeline when incident investigations findings are to be resolved.
Section 2760.12(b)(5)	Requires the documentation of the evaluation of the performance of contractors.
Section 2765.1 (b)	Additional requirements for documenting different required actions for Emergency Response Applicability.

If you have any questions regarding the CalARP Program requirements, please contact EMD Specialists Daniel Abellon at (916) 584-4256 or Jeni VanDusen at (916) 591-2633.