SACRAMENTO COUNTY

ENVIRONMENTAL MANAGEMENT
PROTECTING PUBLIC HEALTH AND THE ENVIRONMENT

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RISK MANAGEMENT PLAN GUIDANCE DOCUMENT
COUNTY OF SACRAMENTO PROGRAM LEVEL 3 FACILITIES

Purpose

An RMP is required when a regulated substance is used at a facility in excess of the California Accidental Release Prevention (CalARP) program threshold quantity. An RMP must be completed and submitted to the Sacramento County Environmental Management Department, the Administering Agency for the CalARP Program, in accordance with the California Health and Safety Code, Division 20, Chapter 6.95, Article 2 and the California Code of Regulations (CCR) Title 19 Division 2, Chapter 4.5, Articles 1 through 11.

Regulation

19 CCR 2735.5 requires the owner or operator of a stationary source to closely coordinate with the Administering Agency to implement the requirements of this chapter and to determine the appropriate level of documentation required for an RMP to comply with Sections 2745.3 through 2745.9 of 19 CCR Division 2, Chapter 4.5. This guidance describes the documentation required by the Sacramento County Environmental Management Department for the RMP to comply with Sections 2745.3 through 2745.9.

Process

Upon submission of an RMP (new RMP or 5-Year RMP Update), and after the initial review (referred to as a completeness check) of the RMP, EMD notifies the facility if any deficiencies are present. The facility has 60 days to respond and correct the deficiencies. Once the deficiencies are corrected, EMD issues an acceptance letter and posts a public notice on our website indicating that the RMP is complete. Once posted, EMD will make the RMP available at our office for public review and comment for 45 days. EMD will conduct a final review (referred to as an evaluation review) of the RMP in which public comments are considered and the facility may be required to make technical revisions to the RMP.

Format

Submit the RMP electronically as a single digital pdf file. You may send the RMP as an email attachment to rmpsubmittal@saccounty.net. If the file is over 15 megabytes send an email to rmpsubmittal@saccounty.net requesting access to the Sacramento County secure cloud storage.

Additional Information

For additional information regarding the CalARP Program or the RMP submittal process, please call our office at (916) 875-8550.

March 2021

RMP Required Information/Outline:

Executive Summary (Section 2745.3)

Include a BRIEF description of the six required elements that must be addressed in the Executive Summary, as specified in Section 2745.3. Do not include information protected by the federal Patriot Acts or other federal or state laws that protect information that may be important to terrorists. Please note that as of June 28, 2004, release scenarios are no longer included in the Executive Summary.

Include descriptions of:

- Accidental release prevention and emergency response policies at the stationary source.
- Stationary source and regulated substances handled (presented in a paragraph or as bullets):
    - Primary activities (e.g., manufacturer of polyethylene, pulp mill, chlorine wholesaler)
    - Processes subject to regulation
    - Quantities handled or stored
    - Use of regulated substances (e.g., chlorine used to produce bleach, treat wastewater, repackage for sale)
    - Major pieces of equipment involved in the covered process
    - Monitoring and detection equipment in each covered process
    - Emergency shutoffs, cutouts, and mitigation equipment in each covered process
    - Program levels for the processes and the reason why level chosen
- General accidental release prevention program and chemical-specific prevention steps. For example, you may state that you are in compliance with the OSHA PSM rule and the CalARP regulations. You may want to highlight general or specific steps that you believe are keys to your prevention program. These steps may be either engineering controls (e.g., backup systems) or administrative controls (e.g., improved maintenance or training).
- Five-year accident history (e.g., we have had five accidental releases of chlorine in the past five years. The largest release was 1,500 pounds. Nobody offsite was injured, but several houses were evacuated as a precautionary measure during the October 25, 2010, and May 1, 2011, releases).
- Emergency response program (e.g., source has an emergency response plan, that has been coordinated with the community plan. State whether your facility complies with 2765.1 or 2765.2, etc.)

- Summarize planned changes to improve safety (e.g. Process Hazard Analysis/ Compliance Audit/Incident Investigation, etc.)

Offsite Consequence Analysis (Section 2745.4)

- Dispersion Modeling: Provide a brief description of the air-modeling dispersion method used.
- Describe the worst-case scenario (WCS) in which the entire contents of the vessel or pipe are released. Complete the Hazard Assessment Worst Case Scenario Table attached to identify the following:
    - Regulated substance being assessed in the scenario
    - Physical state of the regulated substance
    - Model being used to evaluate the scenario
    - Quantity of the regulated substance that is being released
    - Release rate and release duration
    - Wind speed and atmospheric class
    - Distance to the endpoint
    - Type of topography
    - Public and environmental receptors within the distance
    - Estimate of the population potentially affected
    - Source of the population estimate (use most recently available census data)
    - Passive mitigation measures considered
    - Passive and administrative controls that would limit the quantity of regulated substance that could be released
- Printouts of the performed dispersion model must be included in the appendix.
- Site maps describing the impact area of the Worst Case Scenario release. Draw the distance to the endpoint from the facility as the radius of a circle showing distance to endpoint in all directions from the facility.
- Alternative Case – Provide an Alternative Case Scenario per regulated substance in a process. Complete the Hazard Assessment Alternative Case Scenario Table attached to identify the following:
    - Regulated substance being assessed in the scenario
    - Physical state of the regulated substance
    - Model being used to evaluate the scenario
    - Quantity of the regulated substance that is being released

- Release rate and release duration
- Wind speed and atmospheric class
- Distance to the endpoint
- Type of topography
- Public and environmental receptors within the distance
- Estimate of the population potentially affected
- Source of the population estimate (use most recently available census data)
- Passive mitigation measures considered
- Active mitigation considered

5-Year Accident History (Section 2745.5)

In the 5-Year Accident History, identify and discuss reportable releases of regulated substance within the past five years. Identify the causes of the releases and corrective actions taken to prevent future occurrences. If any release would be identified as an accident per Title 19 of the CalARP regulations, answer the questions in Section 2750.9(a) and 2750.9(b) within this section.

Prevention Program & Emergency Response Program Components (Sections 2745.7 & 2745.8)

Complete the Program Level 3 Prevention Program Data Elements Table attachment.

Prevention Program Summary (Article 6)

Discuss each component of the Prevention Program. The RMP Prevention Program section must provide a summary of each program element per section. Note that the summaries provided are intended to represent actual onsite practices. The RMP will be evaluated to determine if the description provided is an actual program description.

- Process Safety Information (PSI) – Summarize the PSI program element, what information has been compiled (hazards of the chemical, process and equipment), and how it is maintained. Include a Safety Data Sheet (SDS) of the regulated substance in an appendix.

- Process Hazard Analysis (PHA) - Describe the PHA program element and the results of the most recent PHA:
  - Describe PHA methodology upon which this RMP was based
  - Describe how revalidations of the hazard review are completed and how they are documented.
  - External events analysis information, including:

        - Describe human caused and natural-caused external events considered
        - Magnitude or scope of external events considered
    - Operating Procedures – Summarize the facility's operating procedures program element.
    - Training – Summarize the training program element conducted at the facility.
    - Mechanical Integrity Program (MIP) – Summarize the Mechanical Integrity program element.
    - Management of Change (MOC) – Summarize the MOC program element including a description of MOC process.
    - Pre-Startup Safety Review (PSSR) – Summarize the PSSR program element including the PSSR process or include the PSSR procedure.
    - Compliance Audit (CA) – Summarize the Compliance Audit program element. Include some detail of how the compliance audit is documented and how recommendations for changes are tracked by the facility.
    - Incident Investigation – Summarize the Incident Investigation program element including:
        - Incidents that require investigation
        - Procedure for investigating an incident and who conducts the investigation
    - Employee Participation – Summarize the Employee Participation program element including a discussion of how the facility consults and involves employees in the conduct and implementation of the RMP and its elements.
    - Hot Work Permit – Summarize the Hot Work Permit program element.
    - Contractors – Summarize the Contractor program element including:
        - Owner or operator responsibilities; include information on how the owner/operator evaluates contractor safety performance and programs.
        - Contract owner or operator responsibilities; include information on how the owner/operator assures contractors are trained in the work practices necessary to safely perform his or her job.

CalARP Emergency Response Program (Article 7)

Summarize the Emergency Response program at the facility. Identify the level of response intended by employees at the site. Discuss coordination actions with the local response agencies.

Registration (Section 2740.1)

CalARP Registration

Provide a CalARP registration form for all regulated substances onsite in a process from Tables 1, 2 or 3. Include the CalARP registration in an appendix.

Federal Registration

A federal registration form should be submitted as part of the federal submittal packet if applicable. You must also provide a copy of your federal registration to EMD. Note that the Federal and CalARP registration requirements differ. Include the federal registration in an appendix.

RMP Certification (Section 2745.9(b))

Include in the RMP a single certification by the owner/operator that "to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete."

Appendices

The following items are necessary for adequate review of the plan:

- Offsite Consequence Analysis data
- CalARP Registration
- Federal RMP Submittal
- SDS copy for each regulated substance considered in the RMP

RMP Format

- You must submit the RMP as a single file in a digital pdf file format.
- Do not add security or a password to the file.
- Provide a Table of Contents.
- Provide a revisions page to track changes to the RMP/RMP documents.
- Email the RMP to rmpsubmittal@saccounty.net.
- If the file is over 15 megabytes, email rmpsubmittal@saccounty.net to request access to the Sacramento County secure cloud storage where you will be able to upload the RMP

3/18/2021 JV

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