



Central Valley Chemical Safety Day (2009)

RMP/CalARP/PSM/IIPP/HMBP Periodic Submittal Requirements

- Ward Scheitrum, Britz, Inc.



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NH3 Requirements by Quantity (Sample)

Ammonia Qty	Regulation	Filed with	Inspected by	Ag exemption / Note
Any Amount	Accidental Release Reporting (CA)	Reported to OES	N/A	No
>200 cf (sometimes any amount CA)	Hazardous Materials Business Plan	CUPA or Ag Commission	CUPA or Ag Commission	Some chemicals
> 100 lb (Federal)	EPCRA Accidental Release Reporting	Reported to NRC	N/A	No
> 500 lb (CA)	CalARP Risk Management Plan (RMP)	CUPA if requested	CUPA	No
> 500 lb (Federal)	EPCRA Tier 2	LEPC (outside CA)	N/A	No
> 1000 lb	DOT Transportation BIT Inspection (CA)	CHP	CHP	No
>7500 lb	Chemical Vulnerability Assessment	Homeland Security	Homeland Security	No
>10,000 lb (Federal)	ARP (RMP)	RMP Reporting Center	CUPA/EPA	No
>10,000 lb (CA and Federal)	Process Safety Management (PSM)	N/A	Federal and/or State OSHA	No



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RMP Periodic Submittal Requirements

Every five (5) years or when a significant change occurs

Examples of *significant change* include increasing or decreasing the distance to the toxic endpoint by a factor of two or more, adding a new regulated chemical to a process, or doubling the quantity of a chemical in a process.

- * Most facilities submitted their initial RMPs by the original **June 21, 1999** deadline.
- * EPA additional requirements made it necessary for all RMPs to be modified and resubmitted by **June 2004**.
- * The next 5-year anniversary will be coming up in **June of 2009**.



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RMP Periodic Submittal Requirements

RMP Updates

Time-Frame...	Update Trigger
Within 5 years	After initial submission
Within 5 years	Of most recent update (i.e. every 5 years)
Within 3 years	After a substance is first listed in regulation
Same day	As a new chemical above the TQ is added to an existing process
Same day	As a chemical above the TQ is present in a new process
Within 6 months	Of a modification that requires PHA or hazard review
Within 6 months	Of a modification that requires a revised OCA
Within 6 months	Of a modification that alters the Program level

Key:

PHA= Process Hazard Analysis

OCA= Offsite Consequence Analysis

Registration Updates (Section 2745.10(c)(d)(f))

Time-Frame...	Update Trigger	Update Submitted to:
Within 6 months	Of determining facility is no longer subject to CalARP Program	AA and to USEPA for Table 1 or Table 2 facilities
Within 30 days	Of a change in owner/operator	AA

Stationary sources no longer subject to the CalARP Program (subsections (c) and (d), shown in the first row of the table immediately above), shall submit an updated registration known as a “de-registration”.



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RMP Periodic Submittal Requirements

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Environmental Protection and Emergency Response Agency
www.epa.gov/emergencies

CHECKLIST FOR SUBMITTING YOUR RISK MANAGEMENT PLAN (RMP)
March 2009



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CalARP Periodic Submittal Requirements

Every five (5) years or when a significant change occurs

Equivalent to the RMP requirements

(Note: threshold levels are much lower than the RMP)



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CalARP Periodic Submittal Requirements

Covered Process Modification (Section 2745.11)

In accordance with HSC Chapter 6.95, Article 2, Section 25543.2, if a facility intends to modify a process and this modification results in a **significant increase** (compared to the original RMP) in either:

- **the amount of chemical handled in the process; or**
- **the risk of handling a chemical, then the owner or operator shall:**
- **Notify the AA in writing of the facility's intent to modify the stationary source at least five calendar days before implementing any modifications, when possible. Where pre-notification is not reasonably possible, the owner or operator shall provide written notice to the AA no later than 48 hours following the modification.**
- **Consult with the AA to determine whether the RMP should be reviewed and revised.**
- **Establish procedures to manage the proposed modification, which shall be substantially similar to the procedures specified in Sections 2760.6 and 2760.7 of the CalARP Program regulations,**
- **Notify the AA that the procedures above, have been established.**
- **Revise all appropriate documents expeditiously, but no later than 60 days from the date of the facility modification.**



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PSM Periodic Submittal Requirements

No Periodic Submittal Requirements

Maintain documentation in the event of OSHA inspection



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IIPP Periodic Submittal Requirements

No Periodic Submittal Requirements



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HMBP Periodic Submittal Requirements

Every three (3) years or when a significant change occurs

Consult with your local county or CUPA office for more information



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Review Ammonia Refrigeration Maintenance, Inspection, and Documentation Calendar

Review Calendar of Activities



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Any Questions?

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