



CaIARP /RMP DEFICIENCIES

Presented by:

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Management Program

- ✖ Facility assigned a qualified person to implement the RMP, yet the mentioned person has no clue about the RMP requirements.
- ✖ Certification was not signed by a qualified person.
- ✖ Processes are not correctly identified.
- ✖ Registration information are not complete and accurate.



Process Safety Information

- P&ID out of date
- No relief or ventilation system design basis.
- Material of Construction is missing.
- Detection, monitoring & safeguards claimed actually don't exist.
- Maximum intended inventory of vessels and system are not documented accurately.
- Current material safety data sheets for the process chemicals are not available onsite.

Emergency Response Plan

✖ The plan does not address the following:

- escape procedures and routes
- preferred means to report emergencies
- alarm system(s)
- chemical releases
- Training

For responding facility, it does not address:

- coordination with outside parties
- personnel roles
- site security and control
- PPE and emergency equipment, readily accessible and properly maintained
- emergency medical treatment and first aid

Process Hazardous Analysis

- ❌ PSI was not up to date, and available during PHA.
- ❌ All process components were not addressed in the PHA.
- ❌ Recommendation made during the PHA not being addressed.
- ❌ No document showing that the PHA recommendations have been addressed and resolved in a timely matter.
- ❌ No written schedule of when correction actions will be completed for the remaining items.
- ❌ They did not address the external events in the PHA (e.g. sabotage, terrorism, and theft).



Standard Operating Procedures

- ✘ SOPs are not accurate, not complete and does not address all issues.
- ✘ The annual review of written operating procedures and certification that procedures are current and accurate is not done.
- ✘ Consequences of deviation from normal operating limits and steps required to correct or avoid deviations not being addressed.



TRAINING

- ✘ Refresher training is not provided at least every three years.
- ✘ No documentation that training was given on SOPs, operating limits, safety systems, emergency procedures, safe work practices, etc.
- ✘ No documentation on means used to verify that the employees understood the training.

Mechanical Integrity or Maintenance Program

- ✘ Procedures for performing maintenance on all process equipment/components are not addressed.
- ✘ Pressure Relief Valves are not replaced every 5 years.
- ✘ Tests or inspection not being performed or documented.
- ✘ Incomplete work orders.
- ✘ No compliance audits done.

Compliance Audits

- ✖ Audits are not conducted every 3-years and there is no established system to promptly address findings and recommendations.
- ✖ There is no written schedule of when these actions are to be completed.
- ✖ Recommendations have not been resolved in a timely manner.
- ✖ Resolutions have not been documented.



Management of Change

- ✘ Process information was not updated prior to change (e.g. P&IDs)
- ✘ Operating procedures, maintenance practices, and training were not updated prior to change.



Covered Process Modification

- ✘ Facility failed to notify the AA in writing of the owner/operator's intend to modify the SS at least 5 days before implementing the modification.
- ✘ Facility failed to establish procedures to manage the modification.
- ✘ Facility failed to revise appropriate documents.



Contractor's Program

- ✘ Program not being followed.
- ✘ Contract employers' safety performance and programs not been evaluated and documented.
- ✘ Contract employees not been periodically audited.

CalARP Enforcement

- ✂ Penalties:
- ✂ \$2,000/day for violation of the CalARP program.
- ✂ \$25,000/day for knowingly violating the CalARP program.
- ✂ After reasonable notice of the violation by the AA, the SS owner/operator faces misdemeanor or imprisonment in County jail for one year if violation resulted in, or significantly contributed to, an emergency, including fire.