

Cal ARP TAG Meeting October 12, 2016

Dennis Karidis sent out a CalARP Program Level 1, 2, & 3 checklists and asked for comments or questions.

Ruben Williams sent a public review procedure along with other supporting documents.

- Ruben looked at county and federal review processes.
- Ruben had their county counsel review their process.

Industry specific checklists – No updates

General Duty Clause Authority

- Alice Reynolds with Cal EPA was looking into it
- Jack received a reply that the OES council will not assist a request from the CalARP TAG
- Kay Laurence advised that USEPA may be able to assist with interpretation.
- Advised to speak with Jim Bohan with CalEPA.

Proposed Legislation

- Increase penalties for CalARP.
 - Fed EPA offered to send their policy in regards to penalties.
 - Get rid of the knowingly and have it at \$25,000.

Petition Process

- Being reviewed by OEHHA

Seismic Assessments Guidance

- Many CUPA ask facilities to use the guidance document to fulfill the seismic requirement.

What is an Audit?

- A Guidance document will be developed
- Look at Contra Costa's Audit

Training Plan

- The group discussed developing a boiler plate training plan with guidelines on curriculum for new CalARP inspectors
- OES is tasked by the new regulations to develop training curriculum for Program Level 1-2, 2-3, & 4.
 - CSTI will likely develop the training
- UP training framework is available and should be looked at

New Action Items

- none

Refinery task force update

- New regulations likely to take effect in July

USEPA Update

- Executive order 13650 implementation
- Looking to assist states and fill gaps in training
- IIAR will do monthly webinars orientated towards inspectors.
- RMP rulemaking training being offered by the FEDS.
- Last leg of the Fed OSHA training will be centered on refineries and will still go over many of RMP items.
- Increased presence at the CUPA conference.

Upcoming trainings

- Chemical Safety Day in Turlock November 10, 2016.
- Kern County
 - 1 day CalARP training by Resource Compliance (November 14th)
 - 2 day Hazardous Waste Training by NES (November 15th & 16th)

CUPA Conference

- Track A is CalARP and BP
 - Draft schedule was sent out by Dennis Karidis

Codes and Standards Project

- Dennis Karidis has been working with the company IHS Markit on a package that would be available to all CUPA and funded through the CUPA Forum Board Trust
- Ms. Cassie Maloney with IHF was on the phone call
 - Been in the standards business for 50 years
 - Service multiple industries and regulatory agencies
 - Provide information for journals and ebooks
 - Rolled out a new platform called engineering workbench
 - Search functions allow for natural language questions

Joel discussed inspection Excella/Decade checklists

- He will find out if they plan to update the checklists

Solids modeling

- Consider training on solids modeling

Open Forum

- Consider adjusting the CUPA Conference TAG meeting time to fall within normal work hours
- PHA administration and engineering controls being used to close recommendations
- HCL and 37% federal

- Studies on aqua ammonia waste water generated when ammonia is bubbled through water

Next Meeting on 12/14/2016