

#### THE NONFRIGID SIDE OF CALARP

W-A1 March 26, 2025

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### **AGENDA**

 California Accidental Release Program (CalARP) Overview

Industries Subject to CalARP



#### **OBJECTIVES**

 There is more to CalARP than Anhydrous Ammonia

Introduction to other CalARP facilities



### **CALARP OVERVIEW**

 The purpose: To prevent accidental releases of Regulated Substances (RS), and to minimize the damage if releases do occur



#### **CALARP OVERVIEW**

 Facilities which handle, manufacture, use, or store any RS above threshold quantities (TQ).

Risk Management Plan (RMP) required



# RS: Any substance, unless otherwise indicated, listed in Section 5130.6 TQ: Quantity specified for a RS pursuant to Section 5130.6

Chemical Name	CAS Number	Table 1 TQs in (lbs)	Table 2 <sup>2</sup> TQs in (lbs)	Table 3 TQs in (lbs)
Acetaldehyde	75-07-0		10,000	
Acetone cyanohydrin <sup>3</sup>	75-86-5			1,000
Acetone thiosemicarbazide	1752-30-3			1,000/10,000 4
Acetylene [Ethyne]	74-86-2		10,000	
Acrolein [2-Propenal]	107-02-8	5,000		500
Acrylamide	79-06-1			1,000/10,000 4
Acrylonitrile [2-Propenenitrile]	107-13-1	20,000		10,000
Acrylyl chloride [2-Propenoyl chloride]	814-68-6	5,000		100
Aldicarb	116-06-3			100/10,000 4
Aldrin	309-00-2			500/10,000 4
Allyl alcohol [2-Propen-l-ol]	107-18-6	15,000		1,000
Allylamine [2-Propen-l-amine]	107-11-9	10,000		500
Aluminum phosphide <sup>5</sup>	20859-73-8			500
Aminopterin	54-62-6			500/10,000 4
Amiton oxalate	3734-97-2			100/10,000 4
Ammonia (conc 1% or greater) <sup>6</sup>	7664-41-7			500
Ammonia (anhydrous) <sup>6</sup>	7664-41-7	10,000		500
Ammonia (conc 20% or greater) <sup>6</sup>	7664-41-7	20,000		
Ammonium hydroxide (ammonia conc 1% or greater) <sup>6</sup>	1336-21-6			500
Ammonium hydroxide (ammonia conc 20% or greater) <sup>6</sup>	1336-21-6	20,000		



#### **CALARP OVERVIEW**

 CalARP Program Levels

RMP Requirements

COMP	PARISON OF PRO	GRAM REQUIR	EMENTS	
Program 1	Program 2	Program 3	Program 4	
Executive Summary 5073.3	Executive Summary 5073.3	Executive Summary 5073.3	Executive Summary 5073.3	
Worst-case release analysis 5080.3	Worst-case release analysis 5080.3	Worst-case release analysis 5080.3	Worst-case release analysis 5080.3	
	Alternative release analysis 5080.4	Alternative release analysis 5080.4	Alternative release analysis 5080.4	
5-year accident history 5080.9	5-year accident history 5080.9	5-year accident history 5080.9	5-year accident history 5080.9	
	Document management system 5050.6	Document management system 5050.6	Document management system 5110.16	
	Preventi	on Program		
Certify no additional steps needed	Safety Information 5090.1	Process Safety Information 5100.1	In addition to all Program Lev 3 prevention elements, the following are required for Program Level 4	
	Hazard Review 5090.2	Process Hazard Analysis 5100.2		
	Operating Procedures 5090.3	Operating Procedures 5100.3	Safeguard Protection Analysis—for Potential Major Incident 5110.5	
	Training 5090.4	Training 5100.4	Hierarchy of Hazard Control Analysis 5110.16	
	Maintenance 5090.5	Mechanical Integrity 5100.5	Process Safety Culture Assessment 5110.17	
	Compliance Audit 5090.6	Compliance Audit 5100.8	Human Factors Program 5110.18	
	Incident Investigation 5090.7	Incident Investigation 5100.9	Accidental Release Preventio Program Management System 5110.19	
		Management of Change 5100.6	Access_to documents and Information 5110.20	
		Pre Startup Review 5100.7		
		Employee Participation 5100.10		
		Hot Work Permit 5100.11		
		Contractors 5100.12		
	Emergency R	esponse Program		
Coordinate with local emergency responders	Develop a plan and program (if applicable) and coordinate with local emergency responders	Develop a plan and program(if applicable) and coordinate with local emergency responders	Develop a plan and program ( applicable) and coordinate wi local emergency responders	

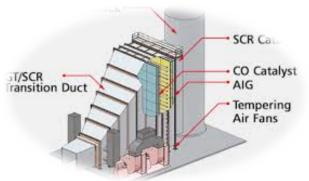






## OTHER CALARP INDUSTRIES



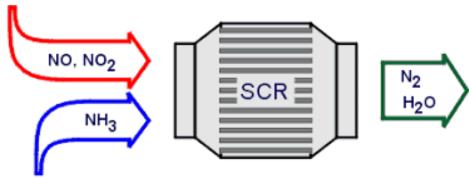














- Chemicals of Concern:
  - Ammonia<sup>5</sup> (CAS # 7664-41-7)
  - Concentrations vary:
    - 19.5 % most common **WHY?**

• 5 - ...The listing of ammonia includes anhydrous and aqueous forms of ammonia pursuant to Section 25532(i)(2).



#### Ammonia

– CalARP TQ = 500 lbs (any concentration)

– Federal RMP = 10,000 lbs (< 20% by wt)</p>

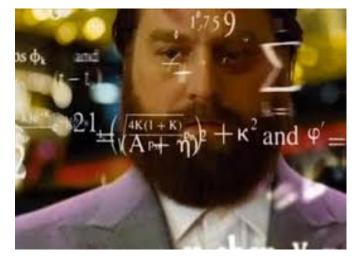
— OSHA PSM = 10,000 lbs (< 44% by wt)</p>



- Aqueous Ammonia = Ammonia<sub>anhydrous</sub> + H<sub>2</sub>O
  - **19.5%** NH<sub>3</sub> +**80.5%** H<sub>2</sub>O
    - = 100% solution

Does 500 gallons = 500 pounds?

- Wt of NH3 = 5.15 lb/gal
- Wt of  $H_2O = 8.34 \text{ lb/gal}$



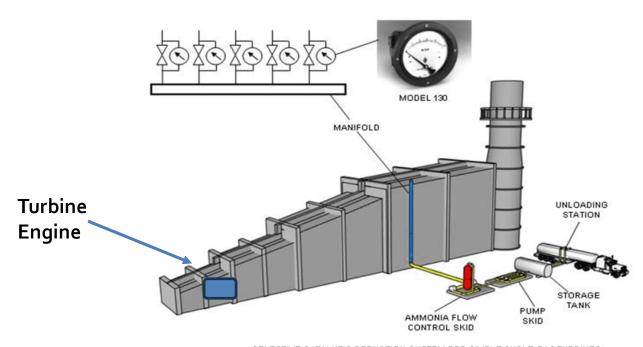
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## ex - 19.5% Aqua Ammonia in 12k gal Tank

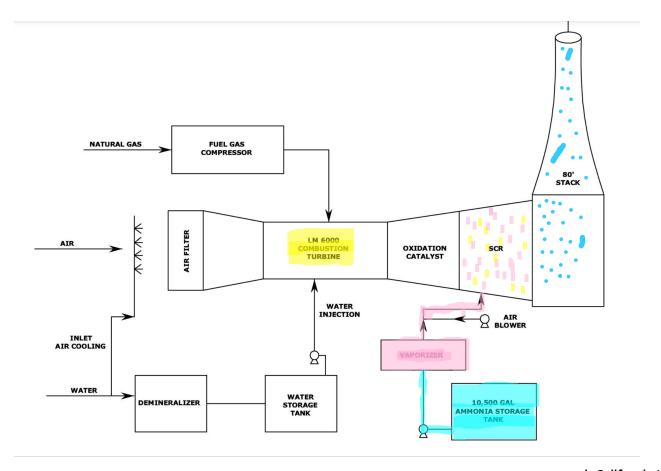
7.71 lbs/gal X 12,000 gal = 92,520 lbs 19.5% Aqua Ammonia 92,520 lbs X19.5% = **18,041 lbs NH3** 





SELECTIVE CATALYTIC REDUCTION SYSTEM FOR SIMPLE CYCLE GAS TURBINES



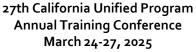




• Equipment - Tanks









#### Ammonia sensors







Shut off's/Audio-Visual



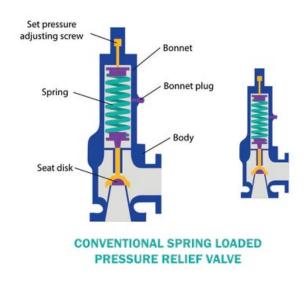


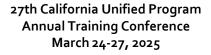
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Pressure Relief









Other Safety Equipment





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## WATER TREATMENT/DISINFECTION





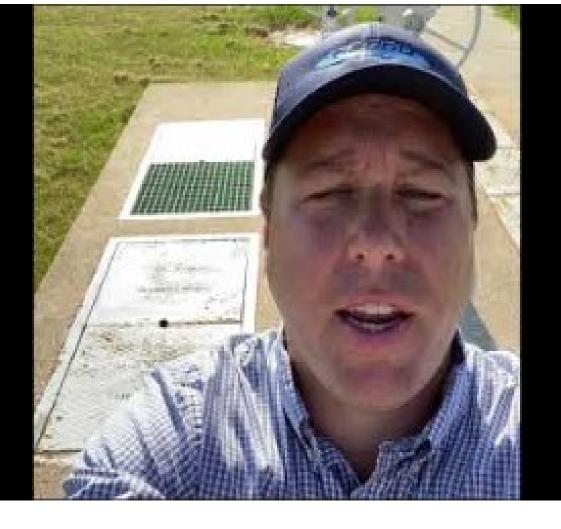
## WATER TREATMENT/DISINFECTION

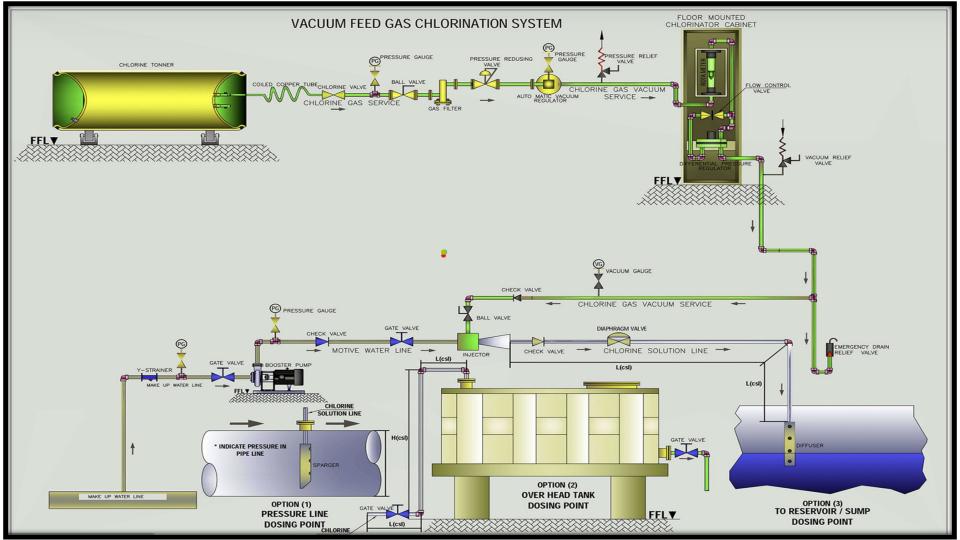
Regulated Substances:

- Chlorine (CAS # 7782-50-5)
  - TQ = 100 lbs

- **Ammonia** (CAS # 7664-41-7)
  - Used to create chloramines

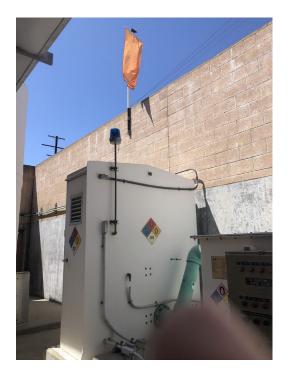


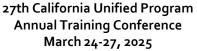




### CHLORINE CONTAINMENT



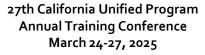










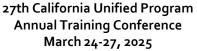




## **CHLORINE CONTAINMENT**







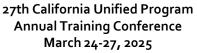


















# **EQUIPMENT-safety system**

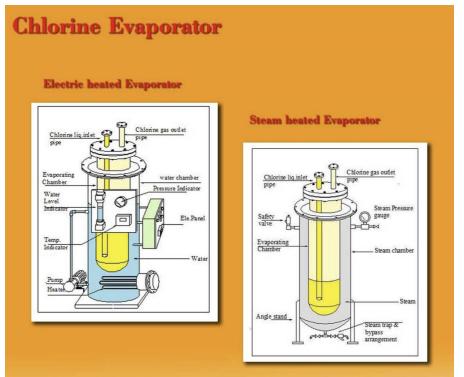


Valve Actuator Systems





## **EQUIPMENT-Evaporators**

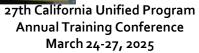




## **EQUIPMENT-Chlorinator**

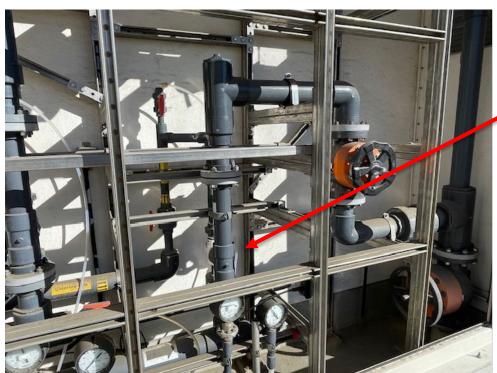








## **EQUIPMENT-Ejectors**



**Ejector location** 



## Safety Systems – Chlorine Sensors







# **METAL FINISHING-Plating Shops**





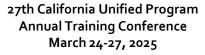


#### METAL FINISHING – Common Chemicals

# **TABLE 3** chemicals Program Level 1

- Sodium Cyanide (CAS #143-33-9)
  - TQ 100 lbs 4
- Potassium Cyanide (CAS #151-50-8)
  - TQ 100 lbs 4
- Cadmium Oxide (CAS #1306-19-0)
  - TQ 100/10,000 lbs <sup>3</sup>







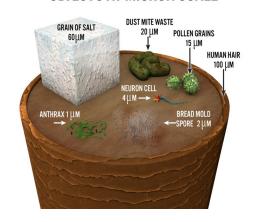
#### METAL FINISHING – Common Chemicals

#### Table 3 Footnotes:

These extremely hazardous substances are solids. The lesser quantity listed applies only if in powdered form and with a particle size of less than 100 microns; or if handled in solution or in molten form; or the substance has an NFPA rating for reactivity of 2, 3, or 4.

Otherwise, a 10,000-pound threshold applies. The exemption ... handled at partial pressures below 10 mm Hg does not apply to these substances.

#### **OBJECTS AT MICRON SCALE**





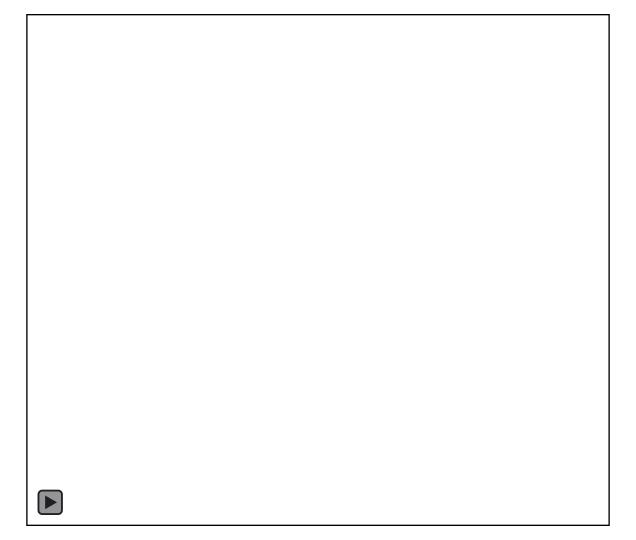
### Powder Flakes Briquets











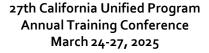
#### METAL FINISHING – Common Chemicals

#### Table 4 Footnotes:

<sup>4</sup> These extremely hazardous substances are **reactive solids**. The exemption ... are handled at partial pressures below 10 mm Hg does not apply to these substances.

Name	Sodium cyanide
Appearance	Color less and odor less
Chemical Formula	NaCN
CAS No.	143-33-9
Chemical Structure	NFPA
Na — C≡N	4 0







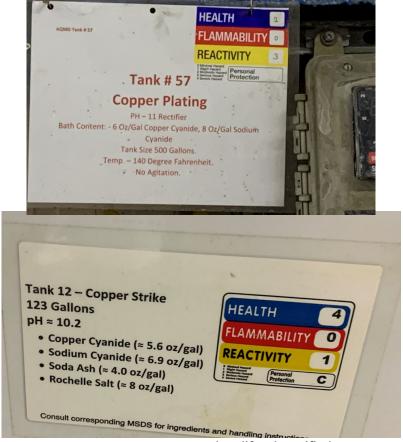






500 gal X 8 oz/gal X 1 lb/16 oz= 250 lbs NaCN

123 gal X 6.9 oz/gal X 1 lb/16 oz= 53 lbs NaCN



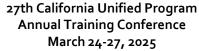




Table 6-1
Evaluation of Maximum Quantity of Listed Substances On-Site

Process	Listed Substance	Largest Vessel/ Container	Maximum Quantity Stored (lbs)	Subject to Federal RMP	Subject to CalARP
Storage (CdO powder)	Cadmium oxide	55 pounds	. 83	No	No
Storage (KCN briquettes)	Potassium cyanide	110 pounds	330	No	Yes
Storage (NaCN briquettes)	Sodium cyanide	110 pounds	770	No	Yes
Open process tanks (B-4, B-6, B-7, B-8)	Cadmium oxide	181 gallons	136	No	Yes
Open process tanks (AG-12, AG-13, AG-14, AG-15)	Potassium cyanide	181 gallons	748	No	Yes
Open process tanks (B-4, B-6, B-7, B-8, B-12, B-13, CJ-2, CJ- 3, CJ-6, CJ-7)	Sodium cyanide	162 gallons	1,238	No	Yes

<sup>(</sup>a) Threshold quantity for cadmium oxide, potassium cyanide, and sodium cyanide is 100 lbs.

Threshold quantity for cadmium oxide is 100 lbs for powdered forms in a particle size of less than 100 microns. Otherwise, 10,000 lbs threshold applies.

Table 6-2
Summary of Open Process Tanks Containing Regulated Substances

Tank Number	Tank Name	Tank Volume (gal)	Regulated Substance	Regulated Substance Quantity (lbs)
AG-12	Silver Flash #1	181	Potassium cyanide	170
AG-13	Silver Flash #2	181	Potassium cyanide	170
AG-14	Silver Plate #1	181	Potassium cyanide	204
AG-15	Silver Plate #2	181	Potassium cyanide	204
		101	Cadmium oxide	34
B-4	Cadmium Plating	181	Sodium cyanide	119
	Cadmium Plating	101	Cadmium oxide	34
B-6		181	Sodium cyanide	63
	sequentia povide to	107 - 103 130 250 2	Cadmium oxide	34
B-7	Cadmium Plating	181	Sodium cyanide	63
		101	Cadmium oxide	34
B-8	Cadmium Plating	181	Sodium cyanide	119
B-12	Copper Plate	181	Sodium cyanide	113
B-13	Copper Plate	181	Sodium cyanide	113
CJ-2	Cadmium/Copper Strip	162	Sodium cyanide	162
CJ-3	Cadmium/Copper Strip	162	Sodium cyanide	162
CJ-6	Silver Strip	162	Sodium cyanide	162
CJ-7	Silver Strip	162	Sodium cyanide	162









#### Safe storage



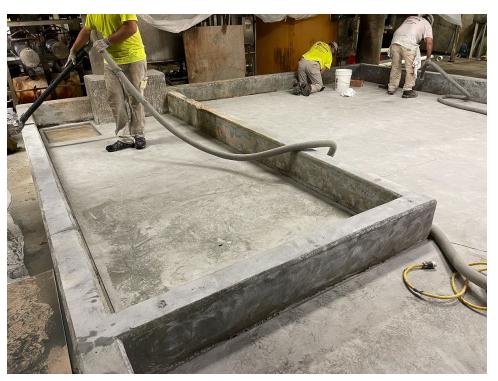




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Containment



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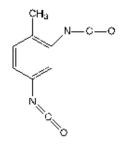
#### **TOLUENE DIISOCYANATE - TDI**

TDI is used as a chemical intermediate to produce polyurethane foams, elastomers, coatings, sealants, adhesives, etc.





#### **TOLUENE DIISOCYANATE - TDI**

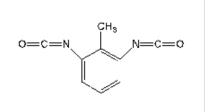


2-4 TDI<sup>8</sup>

CalARPTQ: 500 lbs

Fed TQ: 10,000 lbs

CAS # 584-84-9



2-6 TDI8

CalARPTQ: 100 lbs

Fed TQ: 10,000 lbs

CAS # 91-08-7

<sup>8</sup> - The 10 mmhg exemption does not apply



CAS#: RTECS#: IDLH: Formula: Toluene-2,4-diisocyanate 584-84-9 CH<sub>3</sub>C<sub>6</sub>H<sub>3</sub>(NCO)<sub>2</sub> CZ6300000 Ca [2.5 ppm] Conversion: 1 ppm =  $7.13 \text{ mg/m}^3$ **DOT**: 2078 156 Synonyms/Trade Names: TDI: 2,4-TDI: 2,4-Toluene diisocyanate **Exposure Limits:** Measurement Methods NIOSH REL: Ca (see Table 1): See Appendix A NIOSH 2535, 5521, 5522, 5525 OSHA 18, 33, 42 **OSHA PEL†:** C 0.02 ppm (0.14 mg/m<sup>3</sup>) Physical Description: Colorless to pale-yellow solid or liquid (above 71°F) with a sharp, pungent odor.

Chemical & Physical Properties: Personal Protection/Sanitation MW: 174.2 (see Table 2): (see Tables 3 and 4):

**BP**: 484°F Sol: Insoluble FI.P: 260°F IP: ?

Sp.Gr: 1.22

VP(77°F): 0.01 mmHa

MLT: 71°F **UEL:** 9.5%

LEL: 0.9%

Class IIIB Combustible Liquid

Skin: Prevent skin contact Eyes: Prevent eye contact Wash skin: When contam/Daily Remove: When wet or contam

Change: Daily Provide: Eyewash Quick drench **Respirator Recommendations** 

NIOSH ¥: ScbaF:Pd,Pp/SaF:Pd,Pp:AScba

Escape: GmFOv/ScbaE

Incompatibilities and Reactivities: Strong oxidizers, water, acids, bases & amines (may cause foam & spatter); alcohols [Note: Reacts slowly with water to form carbon dioxide and polyureas.]

Diamond	Hazard	Value	Description
1	Health	3	Can cause serious or permanent injury.
3 2	Flammability	1	Must be preheated before ignition can occur.
	Instability	2	Readily undergoes violent chemical changes at elevated temperatures and pressures.

#### TDI

# Large Volumes



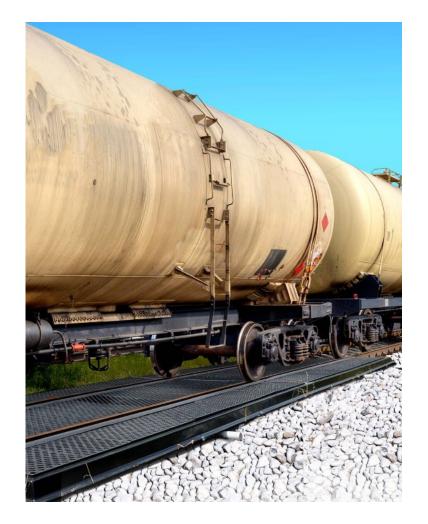


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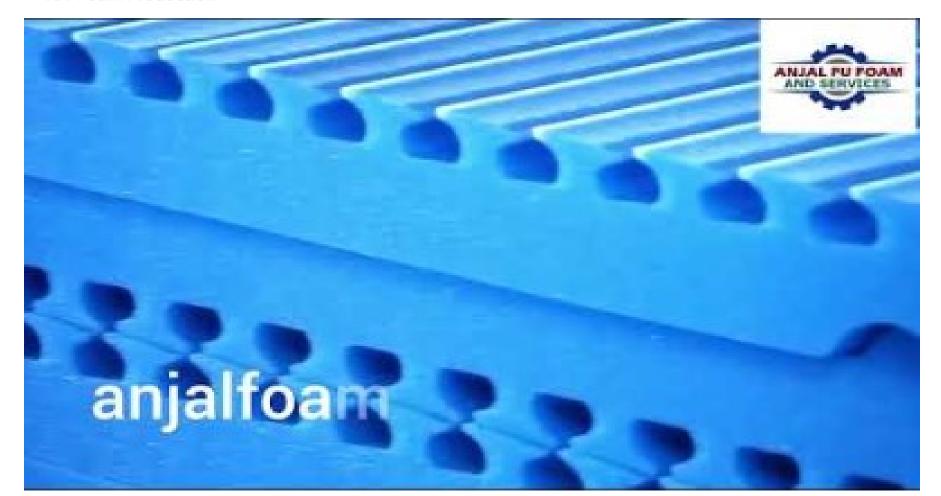
### TDI

• Spill Containment





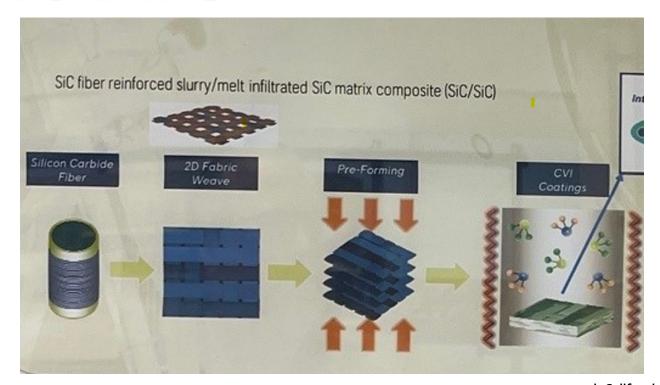
**TDI-Foam Production** 



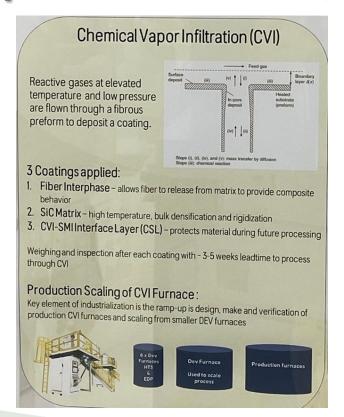
- Methyltrichlorosilane (MTS) CAS # 556-64-9
  - TQ 500 pounds
- Boron Trichloride CAS# 10294-34-5
  - TQ 500 pounds
- Anhydrous Ammonia
  - TQ 500 pounds



#### **PRE-FORMING**















**GAS INLET TUBING** 

HIGH TEMP OVEN

**GAS EXHAUST** 

**GAS SENSORS** 



#### CHEMICAL STORAGE

- Multiple chemicals/RSs
- Potentially multiple covered processes.
- RAGAGEP stems from fire code
  - Must have good safety program
  - ER Plan



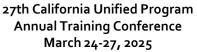




#### **CHEMICAL STORAGE**



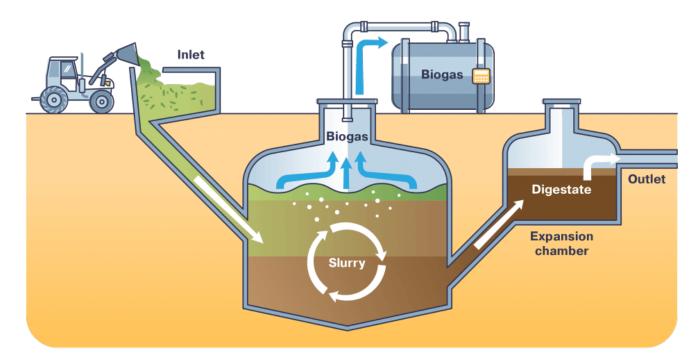






# Biogas

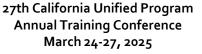
#### **Anaerobic digestion**















Full Displayed Formula of Propane:

H H H H-C-C-C-H

Full Displayed Formula of Butane:

H H H H H-C-C-C-C-H

Full Displayed Formula of Pentane:

H H H H H

Full Displayed Formula of Hexane:

H H H H H H-C-C-C-C-C-C-C-I Skeletal Formula of Propane:



Skeletal Formula of Butane:



Skeletal Formula of Pentane



Skeletal Formula of Hexane:





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- NO RS called NGLs??
- NGLs = Propane (74-98-6) Butane (106-97-8) Pentane (109-66-0)
- Table 2 = 10,000 pounds

#### Table a Flammable

Table 2 - Flammable
Isobutane [Propane, 2-methyl]
Isopentane [Butane, 2-methyl-]
Isoprene [1,3-Butadinene, 2-methyl-]
Isopropylamine [2-Propanamine]
Isopropyl chloride [Propane, 2-chloro-]
Methane
Methylamine [Methanamine]
3-Methyl-1-butene
2-Methyl-1-butene
Methyl ether [Methane, oxybis-]
Methyl formate [Formic acid, methyl ester]
2-Methylpropene [1-Propene, 2-methyl-]
1,3-Pentadinene
Pentane
1-Pentene
2-Pentene, (E)-
2-Pentene, (Z)-
Propadiene [1,2-Propadiene]
Propane
Propylene [1-Propene]
Propyne [1-Propyne]

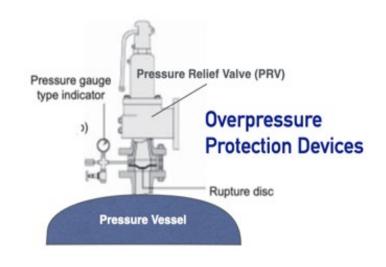








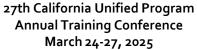
- PRV Maintenance
- Vessel level switches/gauges
  - Clean from gunk
- Daily visual checks





- Compressor Maintenance
  - Oil change
  - Oil level check
  - Clean oil float

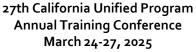






 AQMD inspects pipe to ensure no weeping in all pipe breaks/valves

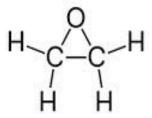






### STERILIZATION – Ethylene Oxide

- Ethylene Oxide = ETO = EO
  - CalARPTQ: 1,000 lbs
  - Fed TQ: 10,000 lbs
  - CAS # 75-21-8







#### **ETO - Containers**









# Medical Sterilization – Ethylene Oxide







### INK/DEVELOPER – HYDROQUINONE6

- CalARPTQ: 500 / 10,0003 lbs

- Fed TQ: 10,000 lbs

- CAS # 123-31-9

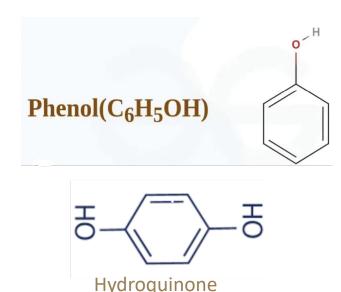
— <sup>6</sup> - Hydroquinone is exempt in crystalline form.





### **INK/DEVELOPER - HYDROQUINONE**

 Throughout film history, the supply of pure PHENOLS has come from byproducts of the petrochemical industry.











#### Material Safety Data Sheet Hydroquinone MSDS

#### Section 1: Chemical Product and Company Identification

Product Name: Hydroquinone
Catalog Codes: SLH1351, SLH2197

CAS#: 123-31-9

RTECS: MX3500000

TSCA: TSCA 8(b) inventory: Hydroquinone

CI#: Not applicable.

Synonym: 1,4-Benzenediol

Chemical Name: 1,4-Dihydroxybenzene
Chemical Formula: C6H4(OH)2

Contact Information:

Sciencelab.com, Inc. 14025 Smith Rd. Houston, Texas 77396

US Sales: 1-800-901-7247 International Sales: 1-281-441-4400 Order Online: ScienceLab.com

CHEMTREC (24HR Emergency Telephone), call:

1-800-424-9300

International CHEMTREC, call: 1-703-527-3887

For non-emergency assistance, call: 1-281-441-4400

#### Section 2: Composition and Information on Ingredients

#### Composition:

Name	CAS#	% by Weight
Hydroguinono	122 21 0	100

Toxicological Data on Ingredients: Hydroquinone: ORAL (LD50): Acute: 320 mg/kg [Rat.]. DERMAL (LD50): Acute: 5970 mg/kg [Mammal].

#### Section 3: Hazards Identification

Potential Acute Health Effects: Hazardous in case of skin contact (irritant, permeator), of eye contact (irritant), of ingestion, of inhalation.

#### Potential Chronic Health Effects:

CARCINOGENIC EFFECTS: Not available. MUTAGENIC EFFECTS: Not available. TERATOGENIC EFFECTS: Not available. DEVELOPMENTAL TOXICITY: Not available. The substance is toxic to lungs, the nervous system, mucous membranes. Repeated or prolonged exposure to the substance can produce target organs damage.

#### Section 4: First Aid Measures

#### Eye Contac

Check for and remove any contact lenses. Immediately flush eyes with running water for at least 15 minutes, keeping eyelids open. Cold water may be used. Do not use an eye ointment. Seek medical attention.



#### INK/DEVELOPER - HYDROQUINONE

Developing Agent	Common Film Developer	Developer Effect
	Common film developer	Developer type
Hydroquinone	DD-X, HC-110 (Ilfotec HC), D-76 (ID-11), Ilfosol 3 (Ilford Simplicity), Dektol, D-96, DF-96 Monobath, TMax developer, PQ Universal developer, Microphen, Bromophen	Full speed developing agent.



#### SKINCARE - HYDROQUINONE





### Semi conductor manufacturing

Arsine gas





### Semi conductor manufacturing



#### Phosphine (PH<sub>3</sub>)

PH<sub>3</sub> is a toxic and flammable gas. It can be used for solar cells, polysilicon, N-type doping process of GaAs diodes, as well as CVD (Chemical Vapor Deposition) process, epitaxy, and ion implantation or diffusion.

#### General Information

	Phosphine (PH <sub>3</sub> )		CAS Num	ber	7803-51-2		
Grade	99.9997%		Formula V	Veight	34.0		
Grade-99.9997 vol.% r	min						
Gas Phase Impurity	N <sub>2</sub>	H <sub>2</sub> O	02	CO2	co	Mathane	
Maximum Concentration	<1 ppmv <1 ppmv		<0.1 ppmv <0.1 ppmv		<0.1 ppmv <0.1 ppmv		

#### Technical Information

Major Hazards	Toxic and flammable	Odor	Fishy odor and pungent odor
Flammable Limits	LFL=1.6% (est.), UFL=98%	Boiling Point @ 1atm	-87.7°C
Exposure Limit	TLV-twa=0.3 ppm	Specific Volume @ 21°C	0.709 l/g



#### **List of List**

#### Where's Wally?



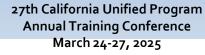
ps://en.wikipedia.org/wiki/Where%27s\_Wally%3F

#### **AGENDA**

	А	В	С	D	E	F	G	Н	1	J	K	L	М	N
1	EPCRA, CERCLA, CAA 1	12(r), and CW/	A 311 Consolidated L	ist of List fo	or Specific (	Chemicals v	vith CAS Numb	bers						
2	THE FOLLOWING LIST SH	HOULD BE US	ED FOR REFEREN	CE ONLY.	COMPLIAN	CE INFORM	MATION CAN E	BE FOUND	IN 40 CFR	PART 3	02 AND TABI	E 302.4		
		CAS												
		Number/		CAA		CIAVA		FDCDA						
		313 Category		CAA 112(r)(7)	CERCLA	CWA 311(j)(5)	EPCRA 302	EPCRA 304 EHS	EPCRA	DCDA	CAS Sort	NAMEIND	5190 App	
3	NAME -	Codes -	Comptox 🔻	TQ -	HS R( -	HS T( ▼	EHS TPC		313 TF ▼	_	_	EX 🔻	3103 App	
348	Chlorendic acid	115-28-6	DTXSID2020268						313		115286	CHLOREN	DIC ACID	
349	Chlorfenvinfos	470-90-6	DTXSID7034250				500	500			470906	CHLORFE	NVINFOS	
350	Chlorimuron-ethyl	90982-32-4	DTXSID0023955						313		90982324	CHLORIM	JRON ETHY	<b>Y</b> L
351	Chlorinated Benzenes	N.A.	DTXSID201034315		&						0	CHLORINA	ATED BENZ	ENES
352	Chlorinated Ethanes	N.A.	DTXSID3028479		&						0	CHLORINA	ATED ETHA	NES
353	Chlorinated Naphthalene	N.A.	DTXSID60103485		&						0	CHLORINA	ATED NAPH	ITHALE
354	Chlorinated Phenols	N084	DTXSID201336737		&				313		1	CHLORINA	ATED PHEN	IOLS
355	Chlorine (5)	7782-50-5	DTXSID1020273	2,500	10	10,000	100	10	313		7782505	CHLORINE	1500	
356	Chlorine dioxide	10049-04-4	DTXSID5023958	1,000					313		10049044	CHLORINE	1000	
357	Chlorine monoxide	7791-21-1	DTXSID50893909	10,000							7791211	CHLORINE	EMONOXIDE	Ξ
358	Chlorine oxide	7791-21-1	DTXSID50893909	10,000							7791211	CHLORINE	OXIDE	
359	Chlorine oxide (CIO2)	10049-04-4	DTXSID5023958	1,000					X		10049044		OXIDE (CL	O2)
												Chlorine		
360	Chlorine Pentrafluoride	13637-63-3									13637633	Pentrafluo ride	1000	

CERS

is your friend!







# Any Questions?

