

PSM/RMP/CalARP Services

"We Lay the Groundwork for Success"

Process Safety Management (PSM)

Whether you need to meet a revalidation deadline or want help with on-going compliance requirements, Condor can assist. The federal and state OSHA Process Safety Management (PSM) programs are in many respects quite similar to the federal RMP programs. However, the PSM and RMP hazardous chemical lists are slightly different, so a facility can be covered by RMP but not PSM and vice versa. Both federal and state OSHA requires that a facility have a PSM program in place for covered chemicals, but there is no requirement for registration with either agency.

Chemical Risk Management Plans (RMP)

If you are the owner or operator of an RMP facility, the regulatory agencies require that you fully update and resubmit your plan at least once every 5 years. If certain changes occur at your facility prior to the 5-year anniversary of your plan, you must update and resubmit your plan before those changes are completed, or within specified time periods. The 5-year anniversary date is reset whenever you fully

update and resubmit your RMP plan. The majority of facilities submitted their initial RMP program by the original June 21, 1999 deadline. This means that most programs should have been updated twice by now.

CalARP

Many states have their own chemical risk management requirements that follow the federal RMP program. In California, the regulations are referred to as the California Accidental Release Prevention Program, or CalARP. In Louisiana, the program is referred to as Chemical Accident Prevention Program, or CAP. The names are different, but the requirements are quite similar. If you need or have an RMP, there is a good possibility you also have state requirements to contend with. Often state requirements apply at lower threshold quantities than the federal RMP. Condor's chemical risk management work spans several states, including extensive experience in California. Condor can help with chemical risk management at your facility.

Condor Services

Condor can assist you with the development and resubmittal of your PSM/RMP/CalARP program. Whether you are new to the requirements of these regulatory compliance programs, are a seasoned professional and have been managing PSM/RMP/CalARP compliance at your facility, or somewhere in between, Condor can provide services to help you through this process. Condor can facilitate and document your PHA, develop or revise your offsite consequence analysis, develop prevention program elements, perform compliance audits, perform mechanical

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integrity audits, prepare your written program, and provide electronic submittal files. Local administering agencies (CUPAs) and California OSHA have conducted audits at several facilities with Condor-developed PSM/RMP/CalARP programs. As a result of sound program development by facility staff and Condor, and commitment by the facilities to comply with the regulatory requirements, few corrective action notices or citations have been issued.



An aqua ammonia pump system for selective catalytic reduction at a combustion turbine facility.

Other Cost Benefits

For most organizations, regulatory compliance is simply viewed as a financial cost and required burden. However, detailed review that an PSM/RMP or Mechanical Integrity audit brings to a facility and ammonia system can pay off in efficiency improvements that can save substantial energy costs. Thus, the cost of the regulatory burden can be reduced in two ways: (1) reduced costs in energy savings, and (2) improved programs to comply with regulatory requirements to reduce the manpower necessary to ensure compliance.

Condor Industrial/Environmental Services

- Risk Management Plan (RMP) Development
- California Accidental Release Prevention Program (CalARP)
- Industrial Storm Water Compliance Support and SWPPP
- Process Hazard Analysis (PHA)
- Offsite Consequence Analysis (OCA)
- Environmental Compliance Audits
- Mechanical Integrity Audit (MI Audit)

Condor's President and CEO

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Mr. Job is a Professional Engineer and Certified Professional Environmental Auditor with over 20 years of experience in Environmental Compliance. He has been with Condor for over 25 years and is currently Condor's President and CEO. You may contact Mr. Job at bjob@condorearth.com or directly at (209) 532-0388 ext. 2030.



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