



**California Accidental Release Prevention (CalARP) Program  
 Federal Risk Management Plan (RMP) Review Checklist**

Facility Name:

Address:

Program:

CERS ID #:

Review Date(s):

| RMP ELEMENT                                    | REFERENCE        | COMPLIANCE               |                          |                          |
|--|------------------|--------------------------|--------------------------|--------------------------|
| <b>General</b>                                 | <b>Subpart A</b> | Complete                 | Incomplete               | Exempt/NA                |
| General Requirements                           | 68.12            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Management                                     | 68.15            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Hazard Assessment</b>                       | <b>Subpart B</b> |                          |                          |                          |
| Applicability                                  | 68.20            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Offsite Consequence Analysis Parameters        | 68.22            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Worst-Case Release Scenario Analysis           | 68.25            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alternate Release Scenario Analysis            | 68.28            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Defining Offsite Impacts - Population          | 68.30            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Defining Offsite Impacts - Environment         | 68.33            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Review and Update (Hazard Assessment)          | 68.36            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Documentation (Hazard Assessment)              | 68.39            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Five-Year Accident History (Hazard Assessment) | 68.42            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Program 2 Prevention Program</b>            | <b>Subpart C</b> |                          |                          |                          |
| Safety Information                             | 68.48            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Hazard Review                                  | 68.50            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Operating Procedures                           | 68.52            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Training                                       | 68.54            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Maintenance                                    | 68.56            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Compliance Audits                              | 68.58            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Incident Investigation                         | 68.60            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Program 3 Prevention Program</b>            | <b>Subpart D</b> |                          |                          |                          |
| Process Safety Information                     | 68.65            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Process Hazard Analysis                        | 68.67            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Operating Procedures                           | 68.69            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Training                                       | 68.71            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Mechanical Integrity                           | 68.73            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Management of Change                           | 68.75            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pre-Startup Review                             | 68.77            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Compliance Audits                              | 68.79            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Incident Investigation                         | 68.81            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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|---|-------------------------|--------------------------|--------------------------|--------------------------|
| Employee Participation  | 68.83                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Hot Work Permit   | 68.85                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Contractors   | 68.87                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b><u>Emergency Response</u></b>  | <b><u>Subpart E</u></b> |                          |                          |                          |
| Applicability   | 68.90                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Emergency Response Program  | 68.95                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b><u>Regulated Substances for ARP</u></b>                                    | <b><u>Subpart F</u></b> |                          |                          |                          |
| Threshold Determination   | 68.115                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Petition Process  | 68.120                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Exemptions  | 68.125                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b><u>Risk Management Plan</u></b>  | <b><u>Subpart G</u></b> |                          |                          |                          |
| Submission  | 68.150                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Executive Summary   | 68.155                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Release Prevention and Emergency Response Policies                            | 68.155(a)               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Stationary Source and Regulated Substances Handled                            | 68.155(b)               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| General Accidental Release Prevention Program                                 | 68.155(c)               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Five-Year Accident History  | 68.155(d)               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Emergency Response Program  | 68.155(e)               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Planned Changes to Improve Safety   | 68.155(f)               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Registration  | 68.160                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Offsite Consequence Analysis  | 68.165                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Five-Year Accident History  | 68.168                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Prevention Program/Program 2  | 68.170                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Prevention Program/Program 3  | 68.175                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Emergency Response Program  | 68.180                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Certification   | 68.185                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Updates   | 68.190                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b><u>Other Requirements</u></b>  | <b><u>Subpart H</u></b> |                          |                          |                          |
| Record Keeping  | 68.200                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Availability of Information to the Public                                     | 68.210                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Permit Content and Air Permitting Authority or Designated Agency Requirements | 68.215                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Audits  | 68.220                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Review & Audit Summary**

General Review of Document

The RMP was received for compliance with the 5-year resubmission requirement on .

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1. Document Review Checklist

The RMP submitted by \_\_\_\_\_ has been reviewed and found to be complete/incomplete.

The attached RMP Document Review Checklist is a copy for your records. The checklist is for determining the completeness of the RMP submitted by your facility per the Clean Air Act (CAA) Title I, Part A, Section 112 (r), and the Code of Federal Regulations (CFR), Title 40, Chapter I, Subchapter C, Part 68. For an incomplete RMP, please refer to the Review Summary area of the checklist for incomplete sections and instructions for corrections.

According to the California Code of Regulations (CCR), Section 2745.2(c) the RMP document submitted by \_\_\_\_\_ will be advertised for a formal public review period of 45 days within 15 days of the date of this correspondence. A copy will be held at the San Joaquin County Environmental Health Department located at 1868 E. Hazelton Ave., Stockton California.

2. Review Summary

**NOTICE TO CORRECT THE RMP**

The following deficiencies were noted in the review of the RMP elements for completeness:

Note: All of the other RMP elements which are not required to be submitted for review, but need to be developed and implemented for the RMP, were checked as “complete” and will be reviewed at the facility during the evaluation review inspection. See item #3 below.

Review Process, Article 3, Section 2745.2(b) – The RMP submittal was found to be incomplete. Deficiency Notice - The AA shall review the RMP to determine if all the elements pursuant to Sections 2745.3 through 2745.9 are contained in the document and provide a written notice to the owner or operator of a stationary source of any deficiencies. (1) The owner or operator of the stationary source shall have 60 calendar days from receipt of the notification of RMP deficiencies to make any corrections. An owner or operator of the stationary source may request, in writing, a one-time 30 calendar day extension to correct deficiencies. At the end of the 60 calendar days, and any extension period if applicable, the stationary source shall resubmit the corrected, revised RMP to the AA. Failure to correct deficiencies during the specified time frame shall subject the owner or operator of the stationary source to the penalties specified in Sections 25540 and 25541 of HSC. See Section 25540 listed below.

Notice of Defects, Article 2, Section 25535 – The RMP was found to be incomplete. (a) An owner or operator of a stationary source submitting an RMP pursuant to this article shall submit the RMP to the administering agency after the RMP is certified as complete by a qualified person and the stationary source owner or operator. The administering agency shall review the RMP and may authorize the air pollution control district or air quality management district in which the stationary source is located to conduct a technical review of the RMP. If, after review by the administering agency and technical review, if any, by the air pollution control district or air quality management district, the administering agency

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determines that the stationary source's RMP is deficient in any way, the administering agency shall notify the stationary source of these defects. The stationary source shall submit a corrected RMP within 60 days of the notification of defects, unless granted a one-time extension of no more than 30 days, of the notice to correct the RMP by the administering agency. Failure to fully comply with this notice or the unified program of this section shall be deemed a violation of this article for purposes of Section 25540.

Submit the corrected RMP with the information listed in the notice to correct the RMP above to our office within sixty calendar days of receiving this notice to correct the RMP by

Upon review, all of the deficiencies noted in the review checklist from \_\_\_\_\_ have been corrected in the re-submittal of the RMP, registration, and related documents received on \_\_\_\_\_.

Continue to ensure compliance with implementation of the RMP according to the statutes and regulations for the Federal RMP program.

**According to the California Health and Safety Code (HSC), Section 25535 (a): Failure to fully comply with this notice or the unified program of this section shall be deemed a violation of this article for purposes of Section 25540. HSC Section 25540 states: (a) Any person or stationary source that violates this article shall be civilly or administratively liable to the unified program agency in an amount of not more than two thousand dollars (\$2,000) for each day in which the violation occurs. (b): Any person or stationary source that knowingly violates this article after reasonable notice of the violation shall be civilly or administratively liable to the unified program agency in an amount not to exceed twenty-five thousand dollars (\$25,000) for each day in which the violation occurs.**

3. Evaluation Review

According to the CCR, Section 2745.2(d) an evaluation review will be conducted once the RMP is considered complete and at the end of the formal public review period. The evaluation review will include an onsite inspection and document review of records and data for the RMP program elements that have been developed and implemented. The evaluation review for program 1 or program 2 processes will be completed within 36 months and for program 3 processes completed within 24 months. I will contact the facility to schedule the inspection within the required timeframe.

Certified Unified Program Agency/Administering Agency