

21st Annual 2019 California CUPA Training Conference

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Posted by CSTC Staff

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CSTC has attended the California CUPA training conference for many years and it has shown to be a great resource for continuing education and enhancement of our programs, clients, staff and the safety culture! With the copious topics and sessions provided during the 4 days of training, there is a lot of information and "take aways." Our focus this year was to attend and engage in the California Accidental Release Prevention Program (Cal/ARP CCR Title 19 D2 Chapter 4.5) presentation sessions. Did you know our very own UPA, Kern County Environmental Health had a scheduled presentation on the Cal/ARP program? This year Jacie Castellon of CSTC attended her first CUPA training after having spent the last year working in our Cal/ARP division here at CSTC. She wanted to share some of her knowledge and notes after one presenter of CUPA made a very broad statement, SAFETY IS EVERYBODY'S BUSINESS.

- — ANY release amount of the regulated substance MUST be reported to your local Unified Program Agency (UPA).
- — Process Hazard Analysis for Program 3 and Hazard Reviews for Program 2 shall be retained for the lifetime of the PROCESS. If a facility is sold, the one assuming the process is still responsible for addressing the recommendations. Recommendations must be addressed within 1.5 years of performing the PHA, or completed on a timetable agreed upon with your local UPA.
- — Ensure your safeguards are current & accurate! Some will document a specific safeguard on their PHA/HR when they are not truly safeguards!
- — Dual Assembly relief valves are required on vessels over 10 cubic feet.
- — CalARP 2760.1(d)(2). The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP) For ammonia refrigeration facilities published consensus documents and RAGAGEP source examples include: IIAR, ASME, and ANSI.
- — It's imperative that your Operating Procedures include: Operating limits, steps to correct deviations, Health & Safety considerations (PPE) as well as safety systems and their functions. The following are the required Program 3 Operating Procedures that shall be developed and implemented: Initial Startup, Normal Operations, Temporary Operations, Emergency Shutdown (including the condition under which ES is required and the assignment of shutdown responsibility), Emergency Operations, Normal Shutdown and Startup following a turnaround or after an emergency shutdown.
- — If you are a responding facility you NEED to be coordinating with your local emergency responders.
- — Your Mechanical Integrity or known for Program 2 facilities as Maintenance Inspections links the primary defense with Safety Systems and should always refer to your Process Safety Information. Mechanical Integrity Inspections should be performed annually.

— I have noted highlights of my learning at the CUPA conference. Of course, many other components and areas must be addressed and documented as part of CalARP and CalPSM.

If you would like to learn more or have us come onsite and evaluate your CalARP or CalPSM program please contact our office at 661.377.8300 and schedule an onsite. Have a great and safe day!

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