

CalARP Checklist Summary of Violations – Program Level 3 Facilities

This is an inspection element checklist of common types of violations of Federal, State, or local laws and regulations. For specific details about your inspection, refer to your Notice to Comply (NTC).

CERS VIOLATION NUMBER	AUTHORITY	DESCRIPTION
General		
Permit		
AP098	SCC 6.96.030	Has an active permit for CalARP covered process(es)
General Applicability		
Q096	19 CCR 4.5 2735.4(a)(1)	Complied with CalARP provisions when having a RS in a process listed in Table 1/2
Q097	19 CCR 4.5 2735.4(a)(2)	Complied with CalARP provisions when having a RS in a process listed in Table 3
Q098	19 CCR 4.5 2735.4(a)(3)	Complied with CalARP provisions when having a RS in a process listed in Table 1/2 and 3
Coordination		
Q099	19 CCR 4.5 2735.5(a)	Closely coordinated with the CUPA to implement the CalARP requirements
Management System		
Q102	19 CCR 4.5 2735.6(a)	Developed a management system to oversee the implementation of the risk management program elements
Q103	19 CCR 4.5 2735.6(b)	Assigned a qualified person or position who has the overall responsibility for the RMP elements
Q104	19 CCR 4.5 2735.6(c)	Documented the names or positions and lines of authority through an organization chart or document
RMP Components and Submission		
RMP Submission		
Q106	19 CCR 4.5 2735.5(b)(1), 2745.1(a)	Submitted a RMP which includes all requirements in Section 2745.3 through 2745.9
Q107	19 CCR 4.5 2745.1(b)(1), 2745.1(b)(2)	Submitted the RMP information required by the USEPA to the USEPA
Q108	19 CCR 4.5 2745.1(c)	Submitted the RMP information required by the USEPA to the CUPA
Q112	19 CCR 4.5 2745.1(d)	Submitted a RMP to the CUPA prior to the date a RS is in a process above the threshold quantity
Q110	19 CCR 4.5 2745.1(h)	Excluded classified information from the RMP
RMP Certification		
Q111	19 CCR 4.5 2745.2(a)	Ensured that the RMP is certified complete by a qualified person and the owner or operator
Q114	19 CCR 4.5 2745.9(b)	Submitted in the RMP the certification statement provided in Section 2745.9(b)
RMP Updates		
Q118	19 CCR 4.5 2745.10(a)	Revised, updated, and submitted the RMP to the USEPA and CUPA per timelines in Section 2745.10(a)
Q121	19 CCR 4.5 2745.10(b)	Revised, updated, and submitted the RMP to the CUPA per timelines in Section 2745.10(b)
Q115	19 CCR 4.5 2745.10(c)	Submitted a de-registration to the USEPA and CUPA within six months of the RS removal
Q116	19 CCR 4.5 2745.10(d)	Submitted a de-registration to the CUPA within six months of the RS removal
Q117	19 CCR 4.5 2745.10(f)	Contacted the CUPA within 30 days of a change of owner or operator to update the registration

RMP Corrections		
Q124	19 CCR 4.5 2745.10.5(a)	Corrected and submitted the data required in the RMP under sections 2745.5, 2745.6(j), and 2745.7(l)
Q119	19 CCR 4.5 2745.10.5(b)	Corrected and submitted the emergency contact information in the RMP within one month of any change
Covered Process Modification		
Q120	19 CCR 4.5 2745.11(a)(1)	Notified the CUPA in writing at least five calendar days before implementing any modifications
Q122	19 CCR 4.5 2745.11(a)(2)	Notified the CUPA within 48 hours after the modification where prenotification is not reasonable
Certificate of Occupancy		
Q123	19 CCR 4.5 2745.12	Complied with Government Code Section 65850.2(b) prior to issuance of a certificate of occupancy
RMP Review		
Q125	19 CCR 4.5 2745.2(b)(1)	Corrected deficiencies within 60 calendar days from receipt of the notification of RMP deficiencies
Registration		
Q126	19 CCR 4.5 2735.5(b)(2)	Included a registration in the RMP that reflects all covered processes
Q127	19 CCR 4.5 2740.1(a)	Completed the registration information and submitted it with the RMP to the USEPA and the CUPA
Q128	19 CCR 4.5 2740.1(b)	Completed the registration information and submitted it with the RMP to the CUPA
Q129	19 CCR 4.5 2740.1(c)	Submitted a registration with a certification of accuracy to the CUPA prior to submittal of the RMP
Q130	19 CCR 4.5 2740.1(d)	Included the data required in Section 2740.1 (d)(1) through (d)(20) in the registration
Hazard Assessment		
General Applicability		
Q133	19 CCR 4.5 2750.1	Conducted a hazard assessment that complies with Sections 2750.2 through 2750.9
Other Requirements		
Recordkeeping		
Q134	19 CCR 4.5 2775.1	Maintained records supporting the implementation of CalARP for five years unless otherwise provided
Q135	19 CCR 4.5 2785.1(a)	Coordinated with CUPA to ensure appropriate technical standards are applied to implement CalARP
Q136	19 CCR 4.5 2785.1(b)	Requested assistance from the CUPA when necessary to address compliance/safety issues with CalARP
Emergency Response Program		
Emergency Response Applicability		
Q137	19 CCR 4.5 2765.1(b)	Stationary source whose employees will not respond to releases met all applicable requirements
Emergency Response - Responding		
Q143	19 CCR 4.5 2765.2(a)	Developed and implemented an emergency response program according to Section 2765.2(a)
Q147	19 CCR 4.5 2765.2(b)	Coordinated the ERP with the community ERP
Q150	19 CCR 4.5 2765.2(c)	Provided LEPC or ER officials information for developing and implementing the community ERP
Program 3 Prevention Program		
Process Safety Information (PSI)		
Q188	19 CCR 4.5 2760.1(a)(b)	Compiled and maintained up-to-date written PSI pertaining to the hazards of the RS in the process
Q189	19 CCR 4.5 2760.1(a)(c)	Compiled and maintained up-to-date written PSI concerning the technology of the process
Q193	19 CCR 4.5 2760.1(a)(d)(1)	Compiled and maintained up-to-date written PSI pertaining to the equipment in the process
Q186	19 CCR 4.5 2760.1(d)(2)	Documented that equipment complies with recognized and generally accepted good engineering practices
Q187	19 CCR 4.5 2760.1(d)(3)	Documented that equipment is designed, maintained, inspected, tested, and operating in a safe manner

Process Hazard Analysis (PHA)		
Q190	19 CCR 4.5 2760.2(a)	Conducted an initial PHA on the covered processes no later than the date of submittal of the RMP
Q191	19 CCR 4.5 2760.2(a)	Performed a PHA that is appropriate for the complexity of the process
Q192	19 CCR 4.5 2760.2(b)	Worked with the CUPA in deciding which PHA methodology is best to determine the process hazards
Q197	19 CCR 4.5 2760.2(b)	Used one or more methodologies in Section 2760.2 to determine and evaluate the process hazards
Q198	19 CCR 4.5 2760.2(c)	The PHA addressed all requirements in Section 2760.2(c)
Q138	19 CCR 4.5 2760.2(d)	PHA performed by team with expertise, experience, and knowledge in the process and PHA methodology
Q148	19 CCR 4.5 2760.2(e)	The PHA addressed all requirements in Section 2760.2(e)
Q195	19 CCR 4.5 2760.2(f)	Updated and revalidated the PHA every five years after the completion of the initial PHA
Q196	19 CCR 4.5 2760.2(g)	Retained all PHAs, updates/revalidations, and documented resolution of recommendations
Operating Procedures		
Q199	19 CCR 4.5 2760.3(a)	Prepared written operating procedures that provide clear instructions for each covered process
Q200	19 CCR 4.5 2760.3(a)(1)	Developed and implemented written operating procedures that address elements in Section 2760.3(a)(1)
Q201	19 CCR 4.5 2760.3(a)(2)	Developed and implemented written operating procedures that address elements in Section 2760.3(a)(2)
Q202	19 CCR 4.5 2760.3(a)(3)	Developed and implemented written operating procedures that address elements in Section 2760.3(a)(3)
Q203	19 CCR 4.5 2760.3(a)(4)	Developed and implemented written operating procedures that address elements in Section 2760.3(a)(4)
Q204	19 CCR 4.5 2760.3(b)	Operating procedures are readily accessible to employees who work in or maintain a process
Q205	19 CCR 4.5 2760.3(c)	Reviewed operating procedures to assure they reflect current operating practice
Q206	19 CCR 4.5 2760.3(c)	Certified annually that the operating procedures are current and accurate
Q207	19 CCR 4.5 2760.3(d)	Developed and implemented safe work practices to provide control of hazards during operations
Training		
Q210	19 CCR 4.5 2760.4(a)	Trained employees involved in operating a process on requirements in Section 2760.4
Q208	19 CCR 4.5 2760.4(b)	Employees operating a process provided refresher training on operating procedures every three years
Q209	19 CCR 4.5 2760.4(c)	Training records identify the employee, training date, and means to verify training was understood
Mechanical Integrity		
Q211	19 CCR 4.5 2760.5(b)	Established and implemented written procedures to maintain the integrity of process equipment
Q212	19 CCR 4.5 2760.5(c)	Employees conducting mechanical integrity are trained on requirements in Section 2760.5(c)
Q215	19 CCR 4.5 2760.5(d)	Mechanical integrity inspections and testing performed according to Section 2760.5(d)
Q213	19 CCR 4.5 2760.5(e)	Corrected deficiencies in equipment that are outside acceptable limits
Q216	19 CCR 4.5 2760.5(f)	Complied with quality assurance requirements in Section 2760.5(f)
Management of Change (MOC)		
Q214	19 CCR 4.5 2760.6(a)	Established and implemented written procedures to manage changes to a covered process
Q218	19 CCR 4.5 2760.6(b)	MOC procedures address all requirements in Section 2760.6(b)
Q217	19 CCR 4.5 2760.6(c)	Employees involved in operating and maintaining a process are informed and trained in any changes
Q219	19 CCR 4.5 2760.6(d)	Updated PSI when MOC resulted in a change to PSI

Q220	19 CCR 4.5 2760.6(e)	Updated operating/maintenance procedures or practices prior to startup if MOC resulted in a change
Pre-Startup Safety Review		
Q221	19 CCR 4.5 2760.7(a)	Performed a pre-startup safety review when the modification required a change in the PSI
Q223	19 CCR 4.5 2760.7(b)	Pre-startup safety review addresses requirements in Section 2760.7(b) prior to introduction of a RS
Compliance Audits		
Q222	19 CCR 4.5 2760.8(a)	Certified and evaluated compliance with the provisions of this article at least every three years
Q224	19 CCR 4.5 2760.8(b)	Compliance audit conducted by at least one person knowledgeable in the process
Q225	19 CCR 4.5 2760.8(c)	Developed a report of the scope, methods used, results and findings of the audit
Q226	19 CCR 4.5 2760.8(d)	Promptly determined and documented response to audit findings, including correction of deficiencies
Q227	19 CCR 4.5 2760.8(e)	Retained the two most recent compliance audit reports
Incident Investigations		
Q228	19 CCR 4.5 2760.9(a)	Investigated each incident that resulted or could reasonably have resulted in a catastrophic release
Q229	19 CCR 4.5 2760.9(b)	Initiated incident investigations within 48 hours of the incident
Q230	19 CCR 4.5 2760.9(c)	Incident investigation team consists of a person with knowledge and experience in the process
Q231	19 CCR 4.5 2760.9(d)	Prepared an incident investigation report that includes all requirements in Section 2760.9(d)
Q233	19 CCR 4.5 2760.9(e)	Established a system to promptly address and resolve the investigation findings and recommendations
AP103	19 CCR 4.5 2760.9(e)	Documented resolutions and corrective actions with actual completion dates
Q232	19 CCR 4.5 2760.9(f)	Reviewed the incident investigation report with all affected personnel
Q234	19 CCR 4.5 2760.9(g)	Retained the incident investigation reports for five years
Employee Participation		
Q235	19 CCR 4.5 2760.10(a)	Developed a written plan of action regarding the implementation of employee participation
Q236	19 CCR 4.5 2760.10(b)	Consulted with employees/representatives on conduct and development of the PHA and PSM elements
Q237	19 CCR 4.5 2760.10(c)	Provided employees/representatives with access to the PHA and all other CalARP information
Hot Work Permit		
Q238	19 CCR 4.5 2760.11(a)	Issued a hot work permit for hot work operations conducted on or near a covered process
Q239	19 CCR 4.5 2760.11(b)	Hot work permit documents all requirements in Section 2760.11(b)
Q240	19 CCR 4.5 2760.11(b)	Hot work permit kept on file until completion of the hot work operations
Contractors		
Q241	19 CCR 4.5 2760.12(b)	Complied with all contractor requirements in Section 2760.12(b)
Q242	19 CCR 4.5 2760.12(c)	Evaluated the performance of the contract owner or operator with requirements in Section 2760.12(c)

RETURN TO COMPLIANCE STATEMENT

This *Return To Compliance Statement* must be returned to EMD within 19 days of your facility's inspection for Priority Corrective Action violations and within 35 days for all other violations (unless otherwise noted on the Notice To Comply.) Also include copies of any proof of compliance documents (e.g. photos, copies of manifests/disposal records or receipts, or other original paperwork.)

Compliance Certification

1. I certify that the violations noted on the Notice To Comply (and accompanying inspection checklists) have been corrected in the manner indicated below.
2. I have personally examined any attached documentation submitted as proof of compliance and I believe the information to be true, accurate and complete.
3. I am aware that there are significant penalties for submitting false information and/or for non-compliance with violations noted.
4. I declare under penalty of perjury that the foregoing certification is true and correct.

Executed at: _____, California Date: _____

Facility Name: _____ Facility ID#(FA): _____

Signature: _____ Printed Name: _____

Position/Title: _____

SUMMARY OF VIOLATION COMPLIANCE ACTION

Violation Number	Check Type of Evidence Submitted			Violation Number	Check Type of Evidence Submitted			Violation Number	Check Type of Evidence Submitted		
	Photo	Paperwork	Statement		Photo	Paperwork	Statement		Photo	Paperwork	Statement
AP098	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q135	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q212	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q096	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q136	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q215	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q097	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q137	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q213	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q098	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q143	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q216	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q099	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q147	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q214	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q102	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q150	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q218	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q103	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q188	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q217	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q104	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q189	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q219	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q106	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q193	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q220	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q107	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q186	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q221	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q108	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q187	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q223	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q112	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q190	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q222	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q110	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q191	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q224	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q111	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q192	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q225	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q114	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q197	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q226	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q118	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q198	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q227	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q121	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q138	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q228	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q115	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q148	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q229	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q116	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q195	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q230	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q117	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q196	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q231	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q124	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q199	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q233	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q119	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q200	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AP103	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q120	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q201	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q232	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q122	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q202	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q234	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q123	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q203	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q235	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q125	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q204	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q236	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q126	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q205	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q237	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q127	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q206	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q238	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q128	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q207	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q239	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q129	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q210	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q240	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q130	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q208	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q241	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q133	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q209	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q242	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q134	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Q211	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				