RMP and PSM in California



Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

California Industry Regulations

Trinity serves a broad cross-section of industries with Process Safety Management (PSM) and Risk Management Program (RMP) support. With a dedicated team of California EHS regulation specialists, Trinity provides expertise in all required elements of CalARP, RMP, and PSM. We deliver comprehensive and efficient solutions that are custom-tailored to a facility's individual need.

In California, the applicability and overlap between federal and state programs can create confusion for many companies striving to comply in a more restrictive regulatory landscape. We understand how the pieces fit together across the different programs and work with clients in all highly hazardous industries to ensure their CalARP/RMP/PSM programs meet every necessary standard.

California industries are subject to one or more of the following federal and state risk management and process safety management requirements:

- Federal Standards or Programs
 - U.S. Occupational Safety and Health Administration (OSHA) Process Safety Management (PSM) of Highly Hazardous Chemicals Standard, 29 CFR 1910.119
 - U.S. Environmental Protection Agency (EPA) Risk Management Program (RMP), 40 CFR Part 68
 - OSHA general duty obligations (aka, "General Duty Clause" or GDC), Section 654 of Title 29 of the United States Code
 - EPA "General Duty Clause," Clean Air Act Section 112(r)(1)
- State Standards or Programs
 - California Occupational Safety and Health Administration (Cal/OSHA) PSM of Acutely Hazardous Materials Standard, CCR Title 8, Section 5189
 - California Office of Emergency Services (Cal OES) California Accidental Release Prevention (CalARP) Program, CCR Title 19, Sections 2735.1 – 2785.1
 - California "General Duty Clause," California Health & Safety Code Section 25531.2(b)



Our CalARP/RMP/PSM Services

- Jurisdictional Boundaries We can determine if your facility is CalARP, RMP, and/or PSM covered and to what extent the coverage applies.
- Process Safety Information (PSI) We implement proven methods to ensure and maintain the accuracy and consistency of PSI.
- **PHA and Risk Assessment** Our team facilitates a variety of Process Hazard Analysis methodologies and other comprehensive risk studies.
- Mechanical Integrity We provide full support for implementing and executing a comprehensive and accurate fixed equipment Mechanical Integrity and Inspection program.
- **Software Solutions** We deliver custom software applications that can replace or improve your current solutions and help you meet CalARP/RMP/PSM objectives.
- Custom CalARP/RMP/PSM Training We can present standard or customized training to your employees remotely or in-person to ensure a successful implementation of your CalARP/RMP/PSM programs.
- Off-site Consequence Analysis (OCA) and On-site Best
 Practices Modeling We develop, update, and review OCA
 modeling to meet CalARP and RMP requirements and best
 practice reviews. These modeling studies can be used to evaluate
 toxic releases and fire/explosion scenarios, including building
 damage assessment.
- Risk Management Plan We assist clients in preparing and submit Risk Management Plan initial submissions, corrections, and resubmissions to local Certified Unified Program Agency (CUPA) and EPA via the EPA RMP*eSubmit database.

- Management of Change (MOC) We can assist you to implement, steward, and audit MOC processes to ensure long-term maintainability and success.
- Pressure Relief Systems We provide pressure relief system services that satisfy Cal/OSHA rules as well as federal regulations.
 We offer engineering design, analysis and revalidation, flare and disposal system evaluations, process simulations, onsite or remote engineering support, and third-party audits.
- Pre-Startup Safety Review (PSSR) We facilitate and support PSSRs, including redlining as-built PSI, procedures, and ensuring proper completion and documentation.
- **Compliance Audits** We provide support in conducting, developing, and/or implementing successful compliance audit programs, as required by applicable programs.
- Incident Investigation We facilitate investigation methodologies, including Root Cause Analysis, Fault-tree, and Five Why.
- Contractors We help develop programs that ensure contractors stay informed and have input into CalARP/RMP/PSM programs.
- Emergency Response We develop, prepare, and implement strategies to manage highly hazardous chemical releases effectively and safely. We develop Emergency Action or Emergency Response Plans specific to the actions your employees will take in response to releases.
- **Employee Participation** We develop programs that lay the foundation for enhanced employee involvement and input into CalARP/RMP/PSM programs.
- Hot Work Permit We develop and audit Hot Work programs to ensure compliance.
- Trade Secrets We address trade secret requirements for PSM-covered processes and provide appropriate Confidential Business Information (CBI) protection in Risk Management Plan updates.

Working with Trinity in California

Trinity's experienced team delivers high value results for CalARP/RMP/PSM projects. Our clients enjoy the following unique benefits when they choose Trinity:

- Extensive experience with CalARP/RMP/PSM programs.
 Trinity has a well-developed business line surrounding our CalARP/RMP/PSM services to meet the growing and changing needs of our clients.
- Quality results and products delivered by experts. Trinity is one
 of very few environmental consulting firms in the U.S. with ISO
 9001 certified consulting practices. We take pride in developing a
 long-lasting strategic partnership with our clients and ensuring
 high-quality services are delivered.
- Significant California regulatory knowledge and experience.
 Trinity knows and understands the history of the CAA/
 EPCRA, CalARP/RMP/PSM, CUPA and California districts, and applicable accompanying local regulations and requirements.
 Our knowledge of local regulations and experience in their

- application across local and national clients allows us to quickly respond to the services needed and challenges imposed by regulations.
- 4. **Experienced training options for various industries.** Trinity facilitates a national PSM/RMP course multiple times a year. Additionally, our California-specific courses and education events cover a wide variety of air quality and risk management/process safety-related topics, including CalARP/RMP/PSM programs. As desired by clients, we also offer custom courses/training to industry clients, tailoring the course content to match the specific site's requirements and operations. Our educational team is experienced in providing in-person or remote sessions.
- 5. Effective and efficient team. Trinity's team of CalARP/RMP/ PSM experts provide experience in a range of related industries, subject matter, agency negotiation, and with significant experience in performing similar types of work. They work together seamlessly to provide the best results for our clients.

Trinity Can Help

Whatever your challenge, Trinity has the experience and insights to provide intelligent solutions to optimize your health and safety programs, consistent with the CalARP/RMP/PSM requirements. Our knowledge and expertise across a wide range of related issues make us an excellent partner for addressing the CalARP/RMP/PSM requirements.

ISO 9001:2015 certified at our corporate office in Dallas, Texas

CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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