



How To Be Ready For An EPCRA/CAA 112r Inspection



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EPCRA § 304 / CERCLA § 103 In California



- EPCRA §304 / CERCLA §103 : Immediately report accidental releases of listed.
- Keep copies of information
 - Who made the call;
 - What time you called;
 - Who you talked to;
 - What information you provided;
 - Report number;
 - Release Reporting Form/Checklist.
- Send follow-up letter as required, within 7 days





Clean Air Act Amendments Accidental Release Prevention 1990



- Process Safety Management Standard – PSM (1992)
- Risk Management Program Regulation and General Duty Clause (1994-1996)
- U.S. Chemical Safety and Hazard Investigation Board – CSB (1998)

RMP CAA 112(r)(7)

GDC CAA 112(r)(1)



CAA RMP and GDC Law says.....



- Owners & operators have a general duty to:
 - Identify hazards associated with potential accidental release,
 - Design & maintain safe facility, and
 - Minimize consequences of accidental releases.

- RMP → list of chemicals/quantities
- GDC → no list, quantities or NAICS codes





Document Your Management Program



- Process safety information
- Process hazard analysis
- Operating procedures
- Training
- Mechanical integrity
- Management of change
- Pre-startup review
- Compliance audits
- Incident Investigations
- Employee participation
- Hot work permit
- Contractor management





Process Safety Info & Maintenance History

P & ID

Materials of construction

Test Results

Design limits





Follow-up on Recommendations



- Assign responsibility and target for completion, track!
 - ✓ PHA,
 - ✓ Compliance Audit,
 - ✓ Incident Investigations, and
 - ✓ MOC recommendations.



Emergency Response Planning



- Responding facility
- Non-responding facility
- Training, equipment maintenance
- COORDINATION with First Responders and Community....
- Exercised?





Success Defined

No accidents!



No injuries!

No Enforcement!