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# CalARP Program 2 Fees

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#### **California Accidental Release Prevention Program**

- Program aims to prevent catastrophic accidental releases of highly toxic or flammable chemicals.
   Regulated facilities must have prevention programs in place
- Operators that handle specific quantities of regulated hazardous materials must submit a risk management plan to the CUPA under the CalARP Program.



### **Fee Timeline**

- August 13, 2024, Board approved fees and directed CCH to do a feasibility study
- Request to come back in 90 days and present options to reduce Program 2 fees
- This presentation shows the results of the study



### **Adopted Fees**

California Accidental Release Prevention (CalARP) Program	Annual Permit Fee*
Industrial Safety Ordinance	
Program 3/ISO Facility (ISO only fee)	\$ 61,555
Program 4/ISO Facility (ISO only fee)	\$ 59,412
CalARP Program	
Program 1	\$ 7,273
Program 2	\$ 14,948
Program 3	\$ 66,991
Program 3/ISO Facility (CUPA only fee)	\$ 41,037
Program 4/ISO Facility (CUPA only fee)	\$ 89,118
CalARP Risk Factor Analysis Fee	To be calculated using existing MCEI



#### **Proposed Options**

AIM: To continue to support the farming industry in CCC while ensuring a high level of compliance to prevent accidental releases is maintained. This will be done by reallocating CCH's inspection focus which will result in lower fees.

1) Alternate staff perform inspection

2) Third party consultant perform Inspection

3) Reallocate inspection focus



#### **Non-Feasible Options**

Alternate Staff Inspect

Potential union implications

Fee study sets hourly rate same for all staff

Would pull from other inspection work

Consultant Inspect

Potential conflict of interest

No cost savings

Requires internal review and training



**Recommended Option** 

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## Reallocate Inspection Focus



Lowered Fee

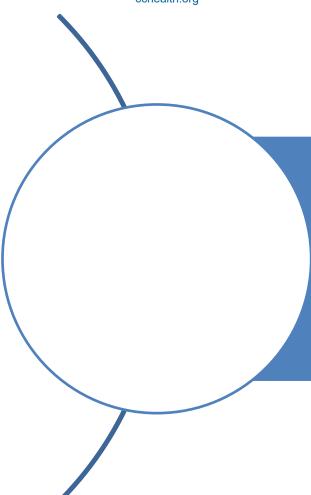
\$9,308 vs \$14,948 (approved by Board)



Reduction of 38%



#### **Reallocation of Inspection Focus**



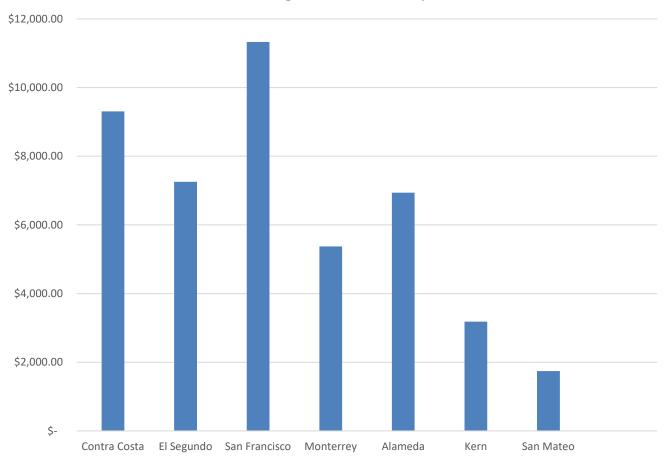
CCH has developed a system to reallocate time spent on Program 2 facility inspections, and will do the following:

- Streamline Subject Matter Expert interviews through development and use of a questionnaire
- Send document request ahead of time to maximize efficiency of inspection time
- Revise audit protocol to incorporate abridged templates for use



## Annual Fee Comparison (CCH Proposed Program 2 Fees vs. Other CUPAS)

#### Cost for Program 2 Facilities by CUPA



- Comparison is of total fees.
  - (base fees, RMP review, inspection)
- Contra Costa has only one fee which covers all.
- Chose varied cross section of counties to compare against
  - Similarly sized,
     neighboring, similar
     industry
- Fresno hourly rate is \$134/hr. total cost not available.





- Allows the Hazmat Program to remain fiscally independent of the general fund.
- Reallocating inspection focus for Program 2 will allow current engineering staffing capacity to inspect new ISO tank terminals.
- No interruption of service to Program 2 facilities



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