



Review and Evaluation of Blasting Analysis International (BAI) Report

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1 Introduction

1.1 Review and Evaluation

ENVIRON has been retained by Perdue AgriBusiness (“Perdue”) to review and evaluate a report prepared by Blasting Analysis International¹ (“BAI report”) regarding the potential explosion hazard posed by a proposed soybean plant in Conoy Township, Lancaster County, Pennsylvania. Results of that review and evaluation are presented here. Relevant excerpts from cited references (see footnotes) are reproduced in the attachment to this review and evaluation.

1.2 Proposed Soybean Plant

Perdue is planning to construct a Soybean Facility in Conoy Township, Lancaster County, Pennsylvania. The facility will be located approximately nineteen miles southeast of Harrisburg (Figure 1), adjacent to the Lancaster County Solid Waste Management Authority’s Waste-to-Energy Facility near Bainbridge (Figure 2). The preliminary site plan of the proposed plant is shown in Figure 3.

The facility will process approximately 17.5 million bushels of soybeans annually to produce soybean meal, soybean hulls, and soybean oil. The soybean meal will be used as an animal feed ingredient. The soybean oil, which is not combustible, will be sold to others for further processing. No fuel will be produced by the facility.

The proposed site is in an area that is zoned Industrial (see *Conoy Township Zoning Map* [Conoy Township 2010]), and a soybean processing facility is a permitted use in the zone (see *Official Zoning Ordinance, Conoy Township* [Conoy Township 1992, as amended]). The Conoy Township Zoning Hearing Board has approved a height variance for the proposed facility, and the Lancaster County Planning Commission conditionally approved the final subdivision and land development plan.

The facility will comply with all environmental and safety regulations and will meet all state and federal emission standards. The facility’s design, construction, and operation will comply with current U.S. Occupational Safety and Health Administration (OSHA), National Fire Protection Association (NFPA), and Pennsylvania Code safety and operational requirements.

Typical of such facilities, soybean oil will be extracted using hexane as the solvent. Annual emissions of hexane will be in compliance with the U.S. Environmental Protection Agency’s (USEPA) *40 CFR Part 63, Subpart GGGG, National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production*.

¹ BAI. 2012. “Serious Safety Concerns Regarding Perdue’s Proposed Grain and Oilseed, LLC – Soybean Processing Plant, Conoy Township.” Letter to Gina Mariani, Chair of Conoy Township Board of Supervisors, from R. Frank Chiappetta, BAI. Blasting Analysis International, Allentown, Pennsylvania. September 7.

1.3 Description of ENVIRON

ENVIRON is a scientific consulting firm specializing in environmental matters, with offices throughout the U.S. and overseas. Founded in 1982, ENVIRON has nearly 1,400 employees, operating in eighty-nine offices in eighteen countries.

Since its founding thirty years ago, ENVIRON has earned an international reputation for combining technical expertise and practical experience in assessing health and environmental risks.

Among its many areas of service, ENVIRON has provided Process Safety and Risk Management Services to numerous industry sectors. Projects have spanned the operational needs of multinational companies, including:

- Process safety management (PSM) program evaluation and improvement;
- Risk management planning, including preparing USEPA Risk Management Plans (RMPs);
- Process and job hazard analysis;
- PSM training;
- EHS compliance and management systems audits, including PSM and RMP audits;
- EHS management systems support (development, training, implementation, auditing);
- Auditor skills training (compliance and management systems);
- Compliance management tool development (e.g., compliance certification tools);
- Environmental permitting assistance and compliance services; a special emphasis in Title V, PSD, NSR/NNSR permitting and air regulatory compliance as well as RCRA, wastewater, and stormwater permitting and compliance;
- Investigation and remediation planning to mitigate environmental and public health concerns from the manufacturing and processing of chemicals and crude oil and the releases of products and byproducts into the natural environment;
- Complex litigation and regulatory support;
- Merger & acquisition audits, including PSM and RMP focus areas; and
- Technology assessments.

This review and evaluation of the BAI report was conducted by a team with experience in engineering, industrial hygiene, air dispersion modeling, accidental release analysis, risk management planning, and health risk assessment. The team was led by Mr. Stan Hayes. Mr. Hayes is an ENVIRON Principal, with more than 35 years of experience in environmental science and engineering. One of his primary areas of expertise is the evaluation of air-related

environmental impacts of emissions from industrial and other facilities. He has performed numerous assessments of the impact on air quality and public health of a wide range of such facilities, including vegetable oil processing plants (e.g., soybean, corn, cottonseed, peanut), petroleum refineries, power plants, airports, aerospace manufacturing, and other operations.

He is the primary author of more than sixty scientific papers and presentations and several hundred technical reports on air-related subjects. He is a member and the current chair of the Advisory Council of the Bay Area Air Quality Management District. He is a Fellow of the Air & Waste Management Association.

Mr. Hayes earned an MS in Aeronautics & Astronautics and a BS in Mechanical Engineering from Stanford University.

More information about ENVIRON and Mr. Hayes is available at www.vironcorp.com.

2 Evaluation of BAI Report

2.1 Cited Incidents Are Not Representative of Proposed Soybean Plant And Are Misleading

The BAI report expressed “serious concerns” about the potential effect of an accidental explosion of hexane at the proposed Perdue soybean plant. In support of these concerns, the report cited what it characterized as examples of “explosions in the manufacturing of soybean oil using hexane.” The cited examples are misleading or not representative as follows.

Certain of the examples cited by the BAI report do not involve soybean plants. In particular:

- The explosion in Mexico, which the BAI report states resulted in “200 dead,” occurred twenty years ago in 1992 in Guadalajara and has been reported^{2,3,4} as caused by gasoline leaking from a pipeline into sewers.
- The hexane explosion in South Africa⁵ occurred thirteen years ago in 1999 at a paprika oil facility in a high-density commercial area in Brits, located in the Bojanala Region of the North West Province.
- The explosion in Italy⁶ occurred six years ago in 2006 at an olive oil factory in Perugia, where “sparks from soldering work on a silo [by maintenance workers] led to the first explosion...a second silo...of olive oil also exploded.”

Because the facilities in these three examples were located outside the U.S. and likely were constructed some years ago, it is reasonable to conclude that their design, operation, and maintenance did not incorporate current 2012 U.S. safety standards, which are specifically designed to avoid such accidents.

The BAI report cites other examples “in which hexane was implicated.” Some of these examples are incidents that occurred during equipment maintenance, while the plant was shut down, and not during operation. Others involved incidents away from the production area. In particular:

- The explosion in Brazil⁷ occurred when workers “were cleaning the tank.”
- The explosion in Arkansas⁸ occurred when workers “were repairing an empty tank used to process soybean oil.”

² “1992 Guadalajara explosions.” Wikipedia. Downloaded September 18, 2012.

³ “Guadalajara gas explosion disaster.” The Energy Library. Downloaded September 21, 2012.

⁴ “Guadalajara Sewer Explosion due to Corrosion.” Corrosion Doctors. Downloaded October 8, 2012.

⁵ “Explosion claims second life in South Africa.” Associated Press Worldstream. July 12, 1999.

⁶ “Four dead in explosion at Italian olive oil factory.” Dpa German Press Agency. November 28, 2006.

⁷ “Three Killed in Brazilian Soybean Oil Plant Explosion.” Xinhua News Agency. March 23, 2009.

⁸ “Arkansas Plant Explosion Kills Worker.” Associated Press. May 16, 2006.

- The plant in Iowa⁹ "was shut down for routine cleaning and maintenance."
- The fire in Minnesota¹⁰ was limited to an "area involved exclusively with the storage of and loading out of finished soybean oil and soy biodiesel" and the "involved area was well away from production facilities."
- The explosion in Canada¹¹ occurred in a canola and soybean processing plant "after a small explosion and fire in a conveyor belt... after plant workers restarted the processing system after a power outage."

2.2 Safety Measures At Proposed Soybean Plant Are Not Considered

The BAI report does not address the safety measures that will be incorporated in the design, operation, and maintenance of Perdue's proposed soybean plant. In the last of the remaining examples cited by BAI, the incident was attributed to a failure to implement practices recommended by the NFPA. In particular:

- The explosion in Indiana occurred when, according to a mechanical engineering expert,¹² the plant "failed to implement certain practices prescribed by the National Fire Protection Association."

This will not be the case for the proposed plant, which will be designed, operated, and maintained specifically to comply with NFPA requirements, which include safety measures intended to address circumstances in the examples cited in the BAI report.

With a membership of more than 70,000 individuals worldwide, NFPA is an internationally recognized and cited authority on fire, electrical, and building safety. NFPA "develops, publishes, and disseminates more than 300 consensus codes and standards intended to minimize the possibility and effects of fire and other risks."

These include NFPA 36, "Standard for Solvent Extraction Plants,"¹³ and NFPA 30, "Flammable and Combustible Liquids Code."¹⁴ Due to copyright restrictions, NFPA 30 and NFPA 36 cannot be reproduced here, but are available online at www.nfpa.org. The proposed soybean plant will be built in accordance with both NFPA 36 and NFPA 30.

⁹ "Explosion rocks Iowa plant; eight people hurt." Associated Press. August 30, 2003.

¹⁰ "No explosion at soybean plant." Local News. Jackson County Pilot. May 26, 2009.

¹¹ "Incident News Summary: January 2 – February 20, 2002." AcuSafe Incident Archives, February 2002 Newsletter.

¹² "Agee v. Central Soya Co., Inc., No. 49A04-9611-CV-471, Court of Appeals of Indiana, June 10, 1998." Accessed September 17, 2012.

¹³ "NFPA 36, Standard for Solvent Extraction Plants, 2009 Edition." National Fire Protection Association, Quincy, Massachusetts. December 2008.

¹⁴ "NFPA 30, Flammable and Combustible Liquids Code, 2012 Edition." National Fire Protection Association, Quincy, Massachusetts. June 2011.

Specific safety features of NFPA 36, "Standard for Solvent Extraction Plants," include:

- Establishment of a restricted area within 50 feet of the extraction process within which sources of ignition and powered vehicles are prohibited
- Establishment of a controlled area between 50 and 100 feet from the extraction process
- Requirements for repairs in restricted and controlled areas
- Measures to prevent vapors from migrating beyond the controlled or restricted areas
- Control of sources of ignition and minimum setback distances from process areas
- Measures to address static and stray electrical currents
- Separation of the extraction area and storage of flammable liquids
- Minimum separation distances for solvent storage tanks from the extraction area, property lines, and any important buildings
- Procedures for safe transfer of solvents
- Requirements for the design, construction, installation, and testing of storage tanks in accordance with NFPA 30, "Flammable and Combustible Liquids Code"
- Requirement for installation of any explosion prevention systems
- Requirements for fire-resistive or noncombustible construction of the extraction process
- Specifications for fire protection equipment
- Fire protection measures that include a water spray, deluge, or foam-water system
- Specifications for lightning protection systems
- Emergency procedure requirements
- Requirements for safety during maintenance, including strict rules to prevent sources of ignition during operation and to purge flammable vapors safely during shutdown.

Specific safety features of NFPA 30, "Flammable and Combustible Liquids Code," include:

- Minimum separation distances between aboveground storage tanks and property lines, public ways, and important buildings
- Requirements for fire-resistant tanks to limit temperature rise and prevent release of liquid, failure of the primary tank, failure of the supporting structure, or impairment of venting
- Minimum shell-to-shell spacing of aboveground storage tanks

- Measures for emergency relief venting for fire exposure for aboveground tanks
- Requirements for pressure-relieving devices
- Requirements for fire and explosion prevention and risk control
- Measures for detection and alarm systems and procedures, including notification of fire or emergency personnel and the available public
- Measures for fire protection and fire suppression systems
- Requirements for inspection and maintenance of fire protection equipment
- Measures to ensure that electrical systems and wiring will not constitute a source of ignition for any ignitable vapor that might be present during operation or because of a spill
- Requirements for measures to prevent ignition of flammable vapors
- Measures to address static electricity
- Requirements for emergency planning and training.

These and other measures implemented in the design, operation, and maintenance of the proposed plant (e.g., double-walled solvent storage tanks) are intended specifically to address and relieve concerns such as those expressed by the BAI report.

In addition, hexane is subject to emergency planning and reporting requirements under the federal Emergency Planning and Community Right to Know Act (EPCRA) and the Pennsylvania Hazardous Material Emergency Planning and Response Act (Act 165). The proposed soybean plant will be required to file a report, site plan, and a hexane material safety data sheet (MSDS) with the Pennsylvania Department of Labor and Industry, the Local Emergency Planning Committee (LEPC) of Lancaster County, and the local fire department. Preparation of an Onsite Emergency Response Plan and coordination with the fire department is also standard business practice.

2.3 Cited Lehigh Valley Case Is Not Relevant To Proposed Soybean Plant

The BAI report describes a “case history of damages, injuries and deaths caused by a massive chemical explosion.” The incident described in the BAI report involved an explosion of a hydroxylamine plant in the Lehigh Valley of Pennsylvania in 1999. While acknowledging that “hexane is not the same as hydroxylamine,” the BAI report assumes that the Lehigh Valley explosion is “very similar” to a hypothetical hexane explosion at the proposed soybean plant.

This is not a valid assumption. The Lehigh Valley explosion cited in the BAI report is not relevant to, nor is it representative of, a hexane incident at the proposed soybean plant, should

such an incident occur. According to the case study report prepared by the U.S. Chemical Safety Board (USCSB):¹⁵

- The explosion did not involve hexane, but rather was caused by hydroxylamine, an oxygenated derivative of ammonia.
- With properties very different than hexane, hydroxylamine is a chemical that the USCSB stated:
 - “[H]as long been recognized as an unstable chemical and explosive when concentrated at high temperatures”
 - Is “thermally unstable”
 - “Decomposes at room temperature or in hot water”
 - “Explodes in air when heated above 70°C”
 - “Ignites on contact with copper (II) sulfate, metals, and oxidants (e.g., chlorine)”
 - “May ignite spontaneously in air if a large surface area is exposed.”

Hexane has none of these properties.

The Lehigh Valley explosion did not occur at a soybean plant.

- Instead, the explosion occurred at a facility that was distilling an aqueous solution of hydroxylamine and potassium sulfate.
- It occurred after the distillation process shut down, when hydroxylamine in a process tank and associated piping explosively decomposed due to high concentration and temperature.
- It occurred during the first batch processed at a new plant.
- The Lehigh Valley facility was cited by OSHA with several “willful and serious citations,” and the president was indicted for “alleged criminal violations.”

The USCSB¹⁶ has completed investigations of more than sixty chemical accidents since 1998, and a number of additional accidents are currently under investigation.

- None of the USCSB investigations listed on its website as completed or current involves a soybean plant.

¹⁵ “The Explosion at Concept Sciences: Hazards of Hydroxylamine.” Case Study No. 1999-13-C-PA. U.S. Chemical Safety and Hazard Investigation Board. Washington, DC. March 2002.

¹⁶ U.S. Chemical Safety Board, accessed through homepage at www.csb.gov, September 17, 2012.

2.4 “Unsafe” Separation Distances Were Not Calculated Correctly

The BAI report concludes that a number of “main points of public concern” are located at “unsafe” distances from hexane storage tanks at the proposed soybean plant. The report also concludes that the two hexane storage tanks at the plant will be located too close to one another.

The BAI report’s conclusions are based on a misinterpretation of BAI’s principal reference,¹⁷ a table published by the Institute of Makers of Explosives (IME) that recommends minimum safe separation distances from inhabited buildings, public highways, and passenger railways for storage of various “explosive materials” (which the table defines to mean “explosives, blasting agents and detonators”).

Explanatory note 2 to the IME table defines the term “explosives” to mean “any chemical compound, mixture, or device, the primary purpose of which is to function by explosion.” The table references a list of explosives published by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) of the Department of Justice.¹⁸

Contrary to the BAI report’s assumption, hexane is not an IME “explosive material.”

- Hexane does not have as its primary purpose to “function by explosion.”
- Hexane is not listed on the ATF’s list of explosives.

As a result, the IME table used by the BAI report to conclude that hexane tanks will be at “unsafe” distances from one another and from residences and other nearby points does not apply to hexane.

It follows, therefore, that minimum separation distances in the BAI report are not correctly calculated.

In any event, the final plant design and site plan will ensure that the plant meets all NFPA 30 and NFPA 36 requirements for minimum separation distances from property lines, public roadways, and major buildings, as well as NFPA requirements for minimum shell-to-shell spacing between tanks. For reference, the preliminary site plan in Figure 3 is designed to meet those requirements.

Compliance with NFPA requirements constitutes compliance with Pennsylvania’s requirements for design, construction, and installation of aboveground storage tanks at Subchapter F of 25 Pa. Code Ch. 245. In particular, 25 Pa. Code § 245.521 (performance standards for aboveground storage tanks) specifies that tanks must meet or exceed “recognized industry association codes of practice” and that “[n]ationally-recognized codes and standards shall be used in conjunction with manufacturer’s specifications to comply with this subchapter.” NFPA is

¹⁷ “The American Table of Distances.” Safety Library Publication 2. Institute of Makers of Explosives (IME), Washington, DC. June 1991 (incorporates changes through October 2011).

¹⁸ “Notice of list of explosive materials.” 76 FR 64974. U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Washington, DC. October 19, 2011.

specifically listed in 25 Pa. Code § 245.504(a)(8) as one of the “[n]ationally-recognized associations” referenced throughout Subchapter F.

2.5 Hexane Is Not A Listed Substance In Accidental Release Prevention Programs

The BAI report states that hexane is “highly explosive,” and facilities using it have “suffered from catastrophic explosions.” This is not consistent with the provisions of chemical accident prevention programs designed to identify hazards, prevent accidents, and provide for emergency response and training.

For example, the federal Clean Air Act requires that the USEPA adopt regulations and guidance for chemical accident prevention at facilities using “extremely hazardous substances.” The Risk Management Plan (RMP) Rule adopted by USEPA requires companies that use certain flammable and toxic substances to develop a Risk Management Program, which includes (a) hazard assessment, (b) accident prevention program, and (c) emergency response program. The RMP regulation includes a List of Regulated Substances¹⁹ that lists toxic and flammable substances that are subject to the federal Accidental Release Prevention Program.

Similarly, any facility that stores or uses a “highly hazardous chemical” must comply with process safety management (PSM) standard adopted by the U.S. Occupational Safety and Health Administration (OSHA). That standard requires²⁰ a process hazard analysis (PHA), “written operation procedures, employee training and participation, pre-startup safety reviews, evaluation of the mechanical integrity of critical equipment, contractor requirements, and written procedures for managing change,” as well as a number of additional requirements. The PSM standard includes a list of covered chemicals.

Hexane is not a listed substance under USEPA’s RMP program.

Hexane is not a listed chemical under OSHA’s PSM program.²¹

Hexane is not listed by the nearby State of New Jersey as a substance subject to its Toxic Catastrophe Prevention Act Program.²²

Hexane is not listed by the State of California as a substance subject to its accidental release prevention program (CalARP).²³

¹⁹ 40 CFR § 68.130, “List of substances.” U.S. Environmental Protection Agency, Washington, DC.

²⁰ “OSHA Fact Sheet, PSM of Highly Hazardous Chemicals.” U.S. Department of Labor, Occupational Safety and Health Administration, Washington, DC.

²¹ “OSHA List of Highly Hazardous Chemicals, Toxics and Reactives.” Standard Number 1919.119 App. A. U.S. Department of Labor, Occupational Safety and Health Administration, Washington, DC.

²² “Title 7, Chapter 31, Toxic Catastrophe Prevention Act Program, Subchapter 6, Extraordinarily Hazardous Substances.” New Jersey Administrative Code.

²³ “Article 8, Regulated Substances for Accidental Release Prevention, Chapter 4.5, California Accidental Release Prevention (CalARP) Program.” California Code of Regulations, Title 19, Public Safety, Division 2, Office of Emergency Services.

3 Summary

ENVIRON has reviewed and evaluated the BAI report regarding the potential explosion hazard posed by Perdue's proposed soybean plant in Conoy Township, Lancaster County, Pennsylvania. Results of that review and evaluation are summarized as follows:

- The explosion incidents cited as examples in the BAI report are misleading and not representative of Perdue's proposed soybean plant.
- Safety measures that will be incorporated at the proposed soybean plant are not considered by the BAI report.
- The Lehigh Valley explosion case cited by the BAI report is not relevant to the proposed soybean plant.
- The BAI report's conclusion that separation distances between hexane tanks at the proposed soybean plant and nearby points are "unsafe" is based on incorrect calculations.
- Hexane tank specifications, location, separation distances, and shell-to-shell spacing at the proposed plant will comply with NFPA safety requirements.
- Hexane is not a listed substance in accidental release prevention programs.

For the above reasons, we conclude that the BAI report is materially misleading and inaccurate, and thus is unreliable.

Figures

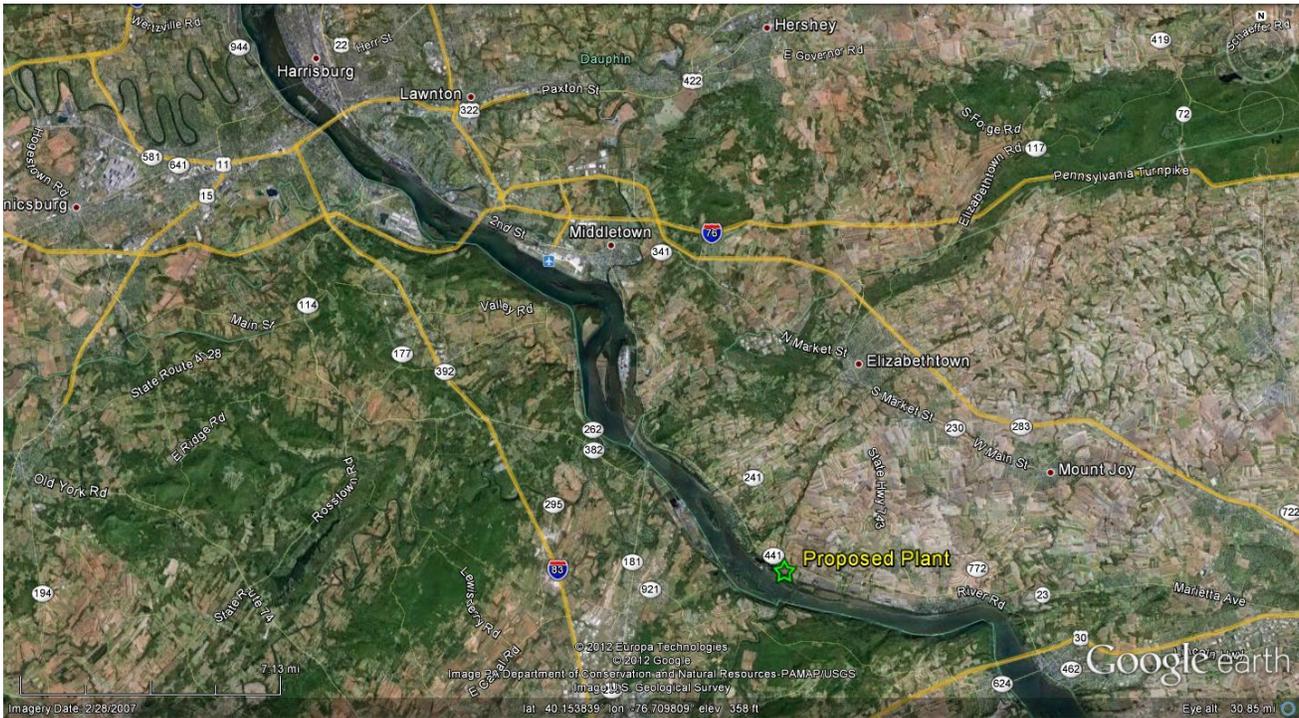


Figure 1. Regional view showing location of proposed facility



Figure 2. Vicinity view showing location of proposed facility

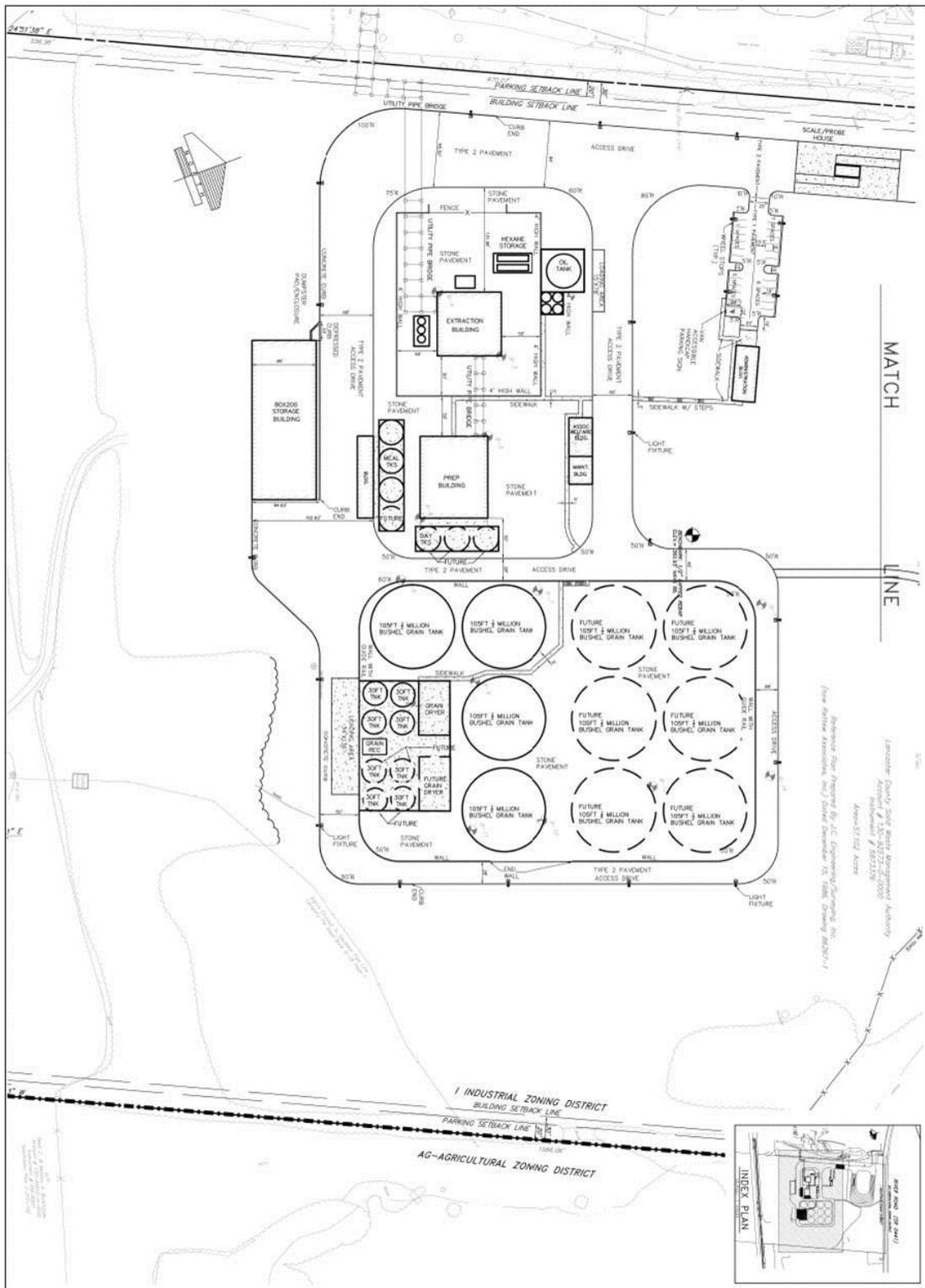


Figure 3. Preliminary site plan of proposed facility

Attachment

Excerpts from Selected References

- ² “1992 Guadalajara explosions.” Wikipedia. Downloaded September 18, 2012.
- ³ “Guadalajara gas explosion disaster.” The Energy Library. Downloaded September 21, 2012.
- ⁴ “Guadalajara Sewer Explosion due to Corrosion.” Corrosion Doctors. Downloaded October 8, 2012.
- ⁵ “Explosion claims second life in South Africa.” Associated Press Worldstream. July 12, 1999.
- ⁶ “Four dead in explosion at Italian olive oil factory.” Dpa German Press Agency. November 28, 2006.
- ⁷ “Three Killed in Brazilian Soybean Oil Plant Explosion.” Xinhua News Agency. March 23, 2009.
- ⁸ “Arkansas Plant Explosion Kills Worker.” Associated Press. May 16, 2006.
- ⁹ “Explosion rocks Iowa plant; eight people hurt.” Associated Press. August 30, 2003.
- ¹⁰ “No explosion at soybean plant.” Local News. Jackson County Pilot. May 26, 2009.
- ¹¹ “Incident News Summary: January 2 – February 20, 2002.” AcuSafe Incident Archives, February 2002 Newsletter.
- ¹² “Agee v. Central Soya Co., Inc., No. 49A04-9611-CV-471, Court of Appeals of Indiana, June 10, 1998.” Accessed September 17, 2012.
- ¹⁵ “The Explosion at Concept Sciences: Hazards of Hydroxylamine.” Case Study No. 1999-13-C-PA. U.S. Chemical Safety and Hazard Investigation Board. Washington, DC. March 2002.
- ¹⁷ “The American Table of Distances.” Safety Library Publication 2. Institute of Makers of Explosives (IME), Washington, DC. June 1991 (incorporates changes through October 2011).
- ¹⁸ “Notice of list of explosive materials.” 76 FR 64974. U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Washington, DC. October 19, 2011.
- ¹⁹ 40 CFR § 68.130, “List of substances.” U.S. Environmental Protection Agency, Washington, DC.
- ²¹ “OSHA List of Highly Hazardous Chemicals, Toxics and Reactives.” Standard Number 1919.119 App. A. U.S. Department of Labor, Occupational Safety and Health Administration, Washington, DC.
- ²² “Title 7, Chapter 31, Toxic Catastrophe Prevention Act Program, Subchapter 6, Extraordinarily Hazardous Substances.” New Jersey Administrative Code.
- ²³ “Article 8, Regulated Substances for Accidental Release Prevention, Chapter 4.5, California Accidental Release Prevention (CalARP) Program.” California Code of Regulations, Title 19, Public Safety, Division 2, Office of Emergency Services.