

Risk Group Update — You are a DHS “High Risk” Facility...Now What?

The Department of Homeland Security's (DHS) implementation of the Chemical Facility Anti-terrorism Standards (CFATS), published June 2007, entered its second stage with the June 23, 2008 launch of the secure online Security Vulnerability Assessment (SVA) tool. The first stage, as many of you possessing a chemical of interest at or above the screening threshold quantity (STQ) recall was the completion of the consequence assessment known as a Top-Screen. Many facilities that completed the Top-Screen were not subject to further regulation under the CFATS by DHS. Appendix A and the Top-Screen allowed DHS to make preliminary determinations about whether facilities present a high level of security risk. Only select facilities notified in writing by the Department of Homeland Security are required to complete and submit the Chemical Security Assessment Tool (CSAT) SVA. Facilities that receive a Department of Homeland Security initial determination letter are considered high-risk and preliminary Tier 1, 2, 3, or 4, based on an analysis of the Top-Screen questionnaire they submitted to the Department.

If you received a letter from the Department of Homeland Security with an initial determination of “high risk”, and you are required to complete a Security Vulnerability Assessment (CSAT SVA), you may have some questions. The

following paragraphs will provide information on how to go about completing this requirement.

Step 1 – Become a “CVI Authorized User”.

CVI stands for Chemical-Terrorism Vulnerability Information and refers to the information protection requirements and procedures established by the CFATS rule to protect sensitive information. All information entered into the CSAT SVA is CVI, and any information DHS prepares and shares with a facility are CVI and are to be marked accordingly, therefore, every CSAT user must be a CVI authorized user. The training course that is required to accomplish this task can be accessed at:

http://www.dhs.gov/xprevprot/programs/gc_1185556876884.shtm

You cannot complete Step 2 until you complete Step 1.

Step 2 – Complete the CSAT SVA.

The initial notification letter sent to the facility from DHS will contain instructions for accessing the CSAT SVA tool. The same user access roles that were assigned for the Top-Screen are retained for the preparation of the SVA. You will be prompted for your user name and password upon initial access of the CSAT SVA tool.

The process of completing the CSAT SVA will be a process of logical data

collection in the following order:

1. Basic facility identification information.
2. Information about chemicals that a facility possesses.
3. Information about assets at the facility that involve chemicals of interest identified by DHS in the notification letter.
4. Data on the vulnerability and consequentiality of attacks on the assets. This is done by locating the assets on an interactive map and requiring that the user apply DHS attack scenarios or define attack scenarios of its own to run against its assets.
5. Information on relevant cyber systems that may affect the security of identified assets.

The above process is accompanied with instructions at each step and similar to the Top Screen process regarding navigation through the process. There are instructions for the CSAT Security Vulnerability Assessment available in PDF format on:

http://www.dhs.gov/xprevprot/programs/gc_1169501486179.shtm

If you have any questions or require any assistance, feel free to call Lesley Evans at 760-744-9611 ext. 118 anytime. ✓

California Greenhouse Gas (GHG) Regulatory Update

California will reduce its statewide greenhouse gas (GHG) emissions to 1990 levels by the year 2020. To achieve this goal, the California Air Resources Board released the Climate Change Draft Scoping Plan on June 26th. Key elements of the plan include:

- Energy efficiency programs
- Renewable energy
- Existing laws and policies
- Targeted fees to fund implementation
- California cap and trade program

The cap and trade program will cover 85 percent of the state's emissions and will be developed in conjunction with the Western Climate Initiative (WCI), a regional carbon market comprised of seven states and three Canadian provinces. Capped sectors include:

- Electricity
- Large industrial sources
- Transportation fuels (by 2020)
- Commercial and residential natural gas (by 2020)

The cap begins in 2012 and declines to meet the mandated 2020 emission levels. For further information please visit <http://www.arb.ca.gov/cc/cc.htm> or contact Mr. Greg Hauser at (760) 744-9611 x106. ✓

TRACER ES&T IS HIRING

We are looking for highly motivated engineers and scientists with interests and skills in air quality analysis, risk assessment, and process safety. We have positions for senior and entry level personnel at all our office locations.

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Compliance Group Update - Recent Changes in California Air Quality Rules

Air quality in California is regulated by the California Air Resources Board at the state level and various air districts at the local level. The following summarizes the Southern California air quality rules that changed between approximately April and July 2008. Tracer ES&T offers a comprehensive set of permitting services including New Source Review (NSR), RECLAIM, Title V, air quality impact assessments, and air toxic risk assessments. If you need assistance with air quality permits, please contact Mr. Greg Hauser at (760) 744-9611 x106.

Antelope Valley Air Quality Management District (AVAQMD)

(<http://www.avaqmd.ca.gov/>)

No changes.

Bay Area Air Quality Management District (BAAQMD)

(<http://www.baaqmd.gov/>)

Regulation 1 - General Provisions and Definitions (Amended 7/9/08)

Regulation 3 - Fees (Amended 5/21/08 and 7/30/08)

Regulation 5 - Open Burning (Amended 7/9/08)

Regulation 6 - Particulate Matter and Visible Emissions, Rule 3 - Wood Burning Devices (Adopted 7/9/08)

Regulation 9 - Inorganic Gaseous Pollutants, Rule 7 - Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional and Commercial Boilers, Steam Generators and Process Heaters (Amended 7/30/08) Manual of Procedures, Volume I, Part 5: Boiler, Steam Generator and Process Heater Tuning Procedure (Amended 7/30/08)

Imperial County Air Pollution Control District (ICAPCD)

(<http://www.arb.ca.gov/drdb/imp/cur.htm>)

No changes.

Kern County Air Pollution Control District (KCAPCD)

(<http://www.arb.ca.gov/drdb/ker/cur.htm>)

No changes.

Mojave Desert Air Quality Management District (MDAQMD)

(http://www.mdaqmd.ca.gov/rules_plans/rule-toc.htm)

No changes.

San Diego Air Pollution Control District (SDAPCD)

(<http://www.sdapcd.org/rules/rules/rr.html>)

Rule 40 - Permits and Other Fees (Amended 7/23/08 & Effective 7/1/08)

Rule 61.4 - Transfer of Volatile Organic Compounds into Vehicle Fuel Tanks (Amended 3/26/08)

Rule 61.4.1 - Transfer of Gasoline from Stationary Underground Storage Tanks into Vehicle Fuel Tanks (Revised 3/26/08)

Rule 67.21 - Adhesive Material Application Operations (Amended 5/14/08 & Effective 11/14/08)

San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD)

(http://www.valleyair.org/rules/rules_recently_adopted.htm)

Rule 7070 - Perchloroethylene from Dry Cleaning Operations (Amended 5/15/08)

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San Luis Obispo County Air Pollution Control District (SLOAPCD)

(<http://www.arb.ca.gov/drdb/slo/cur.htm>)

- Rule 302 - Schedule of Fees (Amended 7/23/08)
- Rule 307.1 - Alternative Fees for Air Toxic Emissions Inventory (Amended 5/2/08)
- Rule 308 - On-Road Motor Vehicle Mitigation Options Fees (Amended 5/2/08)
- Rule 309 - Fees for Regulation XVI (Amended 5/2/08)

Santa Barbara County Air Pollution Control District (SBCAPCD)

(<http://www.sbcapcd.org/rules/rulesnew.htm>)

- Rule 102 - Definitions (Revised 6/19/08)
- Rule 201 - Permits Required (Revised 6/19/08)
- Rule 202 - Exemptions to Rule 201 (Revised 6/29/08)
- Rule 210 & Rule 213 - Fee Adjustments (Revised 7/1/08)
- Rule 333 - Control of Emissions from Reciprocating Internal Combustion Engines (Revised 6/19/08)
- Rule 339 - Motor Vehicle and Mobile Equipment Coating Operations (Revised 6/19/08 & Effective 1/1/09)

South Coast Air Quality Management District (SCAQMD)

(<http://www.aqmd.gov/rules/recentrules.html>)

- Rule 301 - Permitting and Associated Fees (Amended 5/2/08)
- Rule 303 - Hearing Board Fees (Amended 5/2/08)
- Rule 304 - Equipment, Materials, and Ambient Air Analyses (Amended 5/2/08)
- Rule 304.1 - Analyses Fees (Amended 5/2/08)
- Rule 306 - Plan Fees (Amended 5/2/08)
- Rule 311 - Air Quality Investment Program Fees (Amended 5/2/08)
- Rule 313 - Authority to Adjust Fees and Due Dates (Amended 5/2/08)
- Rule 314 - Fees for Architectural Coatings (Adopted 6/6/08)
- Regulation IX - Standards of Performance for New Stationary Sources (Amended 4/4/08)
- Regulation X - National Emission Standards for Hazardous Air Pollutants (Amended 4/4/08)
- Rule 1149 - Storage Tank and Pipeline Cleaning and Degassing (Amended 5/2/08)
- Rule 1158 - Storage, Handling, and Transport of Coke, Coal and Sulfur (Amended 7/11/08)
- Rule 1186 - PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations (Amended 7/11/08)
- Rule 1186.1 - Less Polluting Sweepers (Amended 6/6/08)
- Rule 1196 - Clean On-Road Heavy Duty Public Fleet Vehicles (Amended 6/6/08)
- Rule 1610 - Old Vehicle Scrapping (Amended 7/11/08)
- Rule 2249 - Control of Nitrogen Emissions from Off-Road Diesel Vehicles (Adopted 5/2/08)

Ventura County Air Pollution Control District (VCAPCD)

(<http://www.arb.ca.gov/drdb/ven/cur.htm>)

- Rule 23 - Exemptions from Permits (Revised 4/8/08)
- Rule 42 - Permit Fees (Revised 4/8/08)
- Rule 44 - Exemption Evaluation Fee (Revised 4/8/08)
- Rule 74-12 - Surface Coating of Metal Parts and Products (Revised 4/8/08)
- Rule 74-29 - Soil Decontamination Operations (Revised 4/8/08 & Effective 7/1/08) ✓

Upcoming Events...



free

PSM / RMP / CalARP Workshops

It's time to make your reservation for Tracer ES&T's PSM/RMP/CalARP Workshop, on September 10, 2008 at the Holiday Inn Select in La Mirada, CA. Join us for coffee at 8:00 a.m.

Tracer ES&T will address PSM/RMP/CalARP related topics such as 5-year revals, audits, training, etc. Our training is geared to help safety/plant managers, ammonia refrigeration operators, and chief engineers.



Conference is from 9:00 a.m. — 3:00 p.m., September 10, 2008
Lunch is provided
Holiday Inn Select, 14299 Firestone Blvd., La Mirada, CA

Contact Lee Pyle or Jeanna Emmons at Tracer ES&T (760-744-9611) for more information and to make your reservation. Space is limited.

Refrigerating Engineers & Technicians Association (RETA) 2008 National Convention

September 23-26
Hershey, Pennsylvania

Program Highlights from Tracer ES&T:

"You've Chosen Your Maintenance Contractor; Now What Do You Do?"

(Lee Pyle, Robert DeVillez)

and

"5-Year Revalidations"

(Lee Pyle)

For more convention information log onto RETA's web site at:
<http://www.reta.com/convention/2008/index.htm>



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Tracer ES&T Anniversaries

Some of the Tracer ES&T staff have been together through several name changes: Tracer Technologies, Team Environmental Services, and now, Tracer ES&T. Our staff is the foundation for this company and we appreciate their effort and dedication.

11 Years	Dan Vossler	(10/16/97)
6 Years	Jose DeLeon	(09/04/02)
4 Years	John Fox	(09/20/04)
2 Years	Kim Wolfe	(10/02/06)
1 Year	Britany MacFarlane	(09/17/07)

