Introduction

Contra Costa Hazardous Materials Programs (CCHMP) conducted a comprehensive audit/inspection of the policies, and procedures developed by The Dow Chemical Company (Dow Chemical) located at 901 Loveridge Road in Pittsburg. This audit, conducted in the fall of 2015, was performed to assess compliance with the California Accidental Release Prevention (CalARP) Program. The CalARP program requires the development of prevention programs such as maintenance, operating procedures, contractor safety, personnel training, incident investigations, and understanding hazards at the plant. The inspection also examines the management systems in place to implement these programs and the plant’s emergency response program to make sure that the plant is prepared to respond to an emergency involving a hazardous chemical.

During a comprehensive CalARP audit for a facility like Dow Chemical, CCHMP reviews individual safety programs through answering up to 227 questions. The CCHMP 2015 CalARP audit at Dow Chemical resulted in 7 corrective actions for Dow Chemical to implement, and roughly 21 other items that are not required, but may assist in accident prevention.

Based on our audit/inspection, many of the prevention programs generally met the regulatory requirements. Select prevention programs are identified to need improvement in order to meet the regulatory requirements. Identified below are some notable issues found, both good and bad.

Notable Items:

- **Management:** The facility has a robust management system in place to oversee compliance with various regulatory programs, including CalARP.
- **Changes in Process and Equipment:** A management of change process is in place. However, health and safety evaluations for changes to a covered process need to be documented.
- **Contractor Safety:** A contractor review process is in place. However, a system needs to be developed to verify that the contract owner is providing qualified personnel to do work onsite.
- **Training:** A training program has been developed for operations and maintenance personnel.
- **Hazard Analysis:** Documentation of all decisions made to implement or not implement PHA recommendations, including justification for not implementing any of the recommendations, needs to be retained.
- **Operating Procedures:** Written operating procedures have been developed for the covered processes and provide clear instructions for safely conducting operations. PPE grids for operating procedures need to be reviewed annually to certify that they are current and accurate.

Additional Information

To review the complete safety audit report, visit the Pittsburg Library at 80 Power Avenue, Pittsburg, CA 94565 or call 925-335-3200 for an appointment to view the report at CCHMP’s office located at 4585 Pacheco Blvd., Martinez, CA, 94553.

For more information, questions, or comments regarding this facility or audit, please send an email to ARPTeam@hsd.eccounty.us