

Audit Summary

USS POSCO Industries

Pittsburg, California

Accident History:

The facility has not had an incident related to the regulated CalARP materials in the last five years.

Introduction

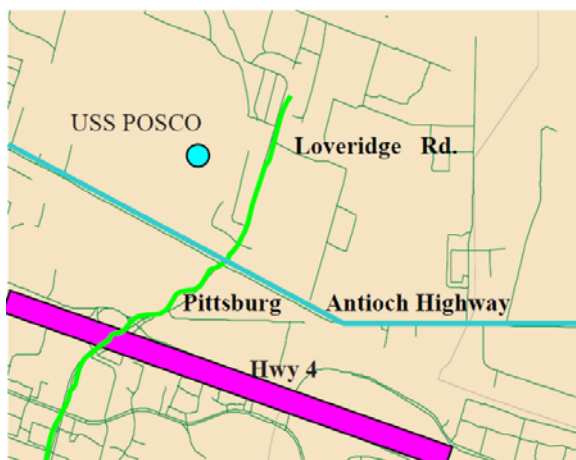
Contra Costa Hazardous Materials Programs (CCHMP) conducted a comprehensive audit/inspection of the policies, and procedures developed by USS POSCO Industries (USS POSCO) located at 900 Loveridge Road in Pittsburg. This audit, conducted in the fall of 2017, was performed to assess compliance with the 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 USS POSCO, CCHMP reviews individual safety programs through answering up to 235 questions. The CCHMP 2017 CalARP audit at USS POSCO resulted in 21 corrective actions for USS POSCO to implement, and roughly 30 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:** A management system is in place. However, management follow-up on several CalARP Program elements needs improvement and the most significant issues include PHA revalidation actions, internal and CalARP compliance audit actions and training.
- **Changes in Process and Equipment:** All process and equipment changes need to include tracking what needs to be completed and documented and employees involved need to be informed of and trained in the change on a timely basis.
- **Self-Audit:** Self-audits have not been completed every three years as required. The facility also needs to document actual completion dates of resolutions.
- **Contractor Safety:** The facility developed a process to request and review contractor safety programs prior to hiring them and developed a process to periodically document their review of them in the field or conduct office audits.
- **Process/Equipment Safety Information:** The facility needs to update the piping specifications to include testing and inspection requirements, flange gasket material, pressure-temperature ratings, joint connection, and thickness.
- **Operating Procedures:** The facility needs to consistently include safety and health considerations in their operating procedures and annually certify that procedures are current and accurate, and the consequences of deviation and steps required to correct or avoid deviating set operating limits are clearly discussed in the Ammonia System SOP.



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.

For more information, questions, or comments regarding this facility or audit, please send an email to hazmat.arpteam@cchealth.org

