

Safety Audit Summary

Chemtrade West Richmond Facility

525 Castro Street, Richmond

Introduction

Contra Costa Health Services Hazardous Materials Program (CCHMP) conducted a comprehensive audit/inspection of the safety programs, policies, and procedures developed by the Chemtrade West Richmond Facility, located at 525 Castro Street, Richmond. This safety audit, conducted in the fall of 2020, was performed to assess compliance with the California Accidental Release Prevention (CalARP) Program and the more comprehensive City of Richmond's Industrial Safety Ordinance (RISO) Safety Program. The prevention programs address maintenance, operating procedures, contractor safety, personnel training, incident investigations and understanding hazards at the plant. The inspection also examines the adequacy of the management systems in place to implement these programs and the plant's emergency response program to verify the plant ability and preparedness to respond to a hazardous chemical emergency.

The audit verified that Chemtrade has addressed City of Richmond's specific requirements for managing additional safety programs beyond those already required under State and Federal regulations. These additional safety programs include:

- Effectively managing organizational changes at the plant so there is minimal impact to emergency response and operations;
- Conducting detailed incident investigations to correct safety programs or management system that contributed to the incident instead of assigning blame to an employee in order to prevent similar incidents from occurring in the future;
- Reviewing the plant's operations and physical layouts for signs of hidden problems that could lead to possible significant incidents. Identifying these signs and correcting them are the primary purposes of the RISO's Human Factors Program;
- Assessing ways to improve new and existing equipment/processes to make them safer to run and to reduce the impact of the hazards in case of an incident.

During a comprehensive safety audit, CCHMP reviews safety programs through answering up to 497 questions. The CCHMP 2020 safety audit at Chemtrade resulted in 51 corrective actions for Chemtrade to implement and 33 other items that are not required but may assist in accident prevention. Identified below is a summary of some of the issues found, both good and bad, within the various safety programs. For ease of presentation, the safety programs have been grouped into three broad topics: management systems, process/equipment issues, and the City of Richmond's ISO requirements.

Management System

- *Oversite/Communication:* Chemtrade needs to allocate sufficient time and resources for the different Safety Program elements especially when it comes to tracking action items.
- *Compliance audit:* Chemtrade needs to make sure that action items are tracked to completion and meet the required timeline.

Process/Equipment Issues

- *Mechanical Integrity:* Preventive maintenance inspection and testing is performed that is consistent with the plant policies.
- *Operating Procedures:* Procedures need to be certified properly annually.
- *Process Hazards Analysis:* Chemtrade needs to track action items to completion and address inherently safer systems (ISS) as part of the PHA review/revalidation process.
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- The process for managing changes in the organization needs to include all departments
- The inherently safety systems program needs to be improved.

Next Steps

The results of the entire safety audit are available for review at the Richmond libraries and at the Hazardous Materials Program Office. (See information below).

Additional Information

For more information, logon to the Hazardous Materials Programs website: <http://www.cchealth.org/groups/hazmat/>. The complete safety audit report is at the Richmond Public Library, 325 Civic Center Plaza, or Point Richmond Public Library, 135 Washington Ave., Richmond, or call 925-655-3200 for an appointment to view the report at CCHMP's offices.

Industrial Safety Ordinance (RISO) Requirements

- Chemtrade needs to review job descriptions to identify gaps in coverage of process safety programs
- Chemtrade needs to conduct procedural PHAs on procedures that are identified as high risk activities.
- Chemtrade also needs to improve the use of human factors checklists, including for PHAs and management of organizational change.



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