



**Desert View Power Inc.
RMP/ PSM Program Level 3**

TRIENNIAL COMPLIANCE AUDIT

Performed December 9, 2021

Performed By:

Ryan Bray, Senior Technical Consultant

For:

Desert View Power Inc. – Mecca Facility
Anhydrous Ammonia System

| Revision | Date | Description |
|----------|-------------------|---------------|
| 0.0 | February 28, 2022 | Initial Issue |
| | | |
| | | |



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1.0 ABOUT THIS STUDY

The Environmental Protection Agency's (EPA's) Risk Management Plan (RMP) and Occupational Safety and Health Administration's (OSHA's) Process Safety Management (PSM) programs require that facilities containing more than listed chemical threshold quantities implement steps and procedures to prevent the potential for accidental releases. As part of the requirements of these programs, facilities must complete a Triennial Compliance Audit. The Compliance Audit is meant to verify that the implemented programs, including procedures, training, and practices, are being adequately used and applied at the facility. This also includes verification of personnel awareness of program requirements and completeness of documentation and records. The ***Desert View Power Inc. – Biomass Power Generation plant (Desert View)*** is regulated by the RMP/PSM/CalARP Program for their Ammonia Injection System.

1.1 OBJECTIVES

The primary objective of the Compliance Audit is to review the RMP/PSM Program 3 documentation and implementation in order to:

- comply with applicable portions of the RMP/PSM Program 3 regulations;
- identify deficiencies in program documentation or implementation;
- suggest methods or improvements that might be implemented to assist the facility with addressing documentation requirements and implementing appropriately.

1.2 ANALYSIS SCOPE

The Compliance Audit considers all documentation and RMP/PSM program information related to the regulated process. The Compliance Audit includes a review/inspection of existing documentation, policies and procedures, and supporting records to determine RMP/PSM Program 3 implementation for the facility. Personnel interviews were performed, as necessary, to assist in verifying that documentation and records provided were accurate. In addition, personnel interviews demonstrate the awareness and participation of the facility's personnel.

The audit covers the following key RMP/PSM Program 3 Prevention Program Elements:

- General Requirements
- Process Safety Information (PSI)
- Process Hazard Analysis (PHA)

- Operating Procedures (OP)
- Mechanical Integrity (MI)
- Training (TRN)
- Compliance Audits (CA)
- Management of Change (MOC)
- Pre-Startup Safety (PSSR)
- Incident Investigation (II)
- Employee Participation (EP)
- Hot Work Permit (HWP)
- Contractors (CON)
- Emergency Response Plan (ERP) Applicability

If deficiencies were found during the comprehensive review of the RMP/PSM documentation, recommendations were developed to correct the current deficiency and develop a solution to improve the program so that future, similar deficiencies can be prevented.

2.0 REFERENCES

The following is a list of references to applicable regulations used in the scope of the Triennial Compliance Audit.

- Code of Federal Regulations, Title 29, Part 1910, Subpart H, Section 1910.119 [29 CFR §1910.119] – “Process Safety Management of Highly Hazardous Chemicals.”
- Code of Federal Regulations, Part 68, Subpart D, Sections 68.1 to 68.220 and Appendix A [40 CFR §68.1 – 68.220 and Appendix A] – “Chemical Accident Prevention Provisions” and “Table of Toxic Endpoints.”

3.0 REQUIREMENTS

Per RMP/PSM regulations, this Compliance Audit will help satisfy the following regulatory requirements.

- The owner or operator shall certify that they have evaluated compliance with the provisions of this article at least every three years to verify that the procedures and practices developed under the chapter are adequate and are being followed.
- The compliance audits shall be conducted by at least one person knowledgeable in the process.
- A report of the findings of the audit shall be developed.
- The owner, operator, employer shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.
- The owner or operator shall retain the two (2) most compliance audit reports.

4.0 COMPLIANCE AUDIT PROTOCOL

The following sections outline the Triennial Compliance Audit protocol used to conduct and document the Compliance Audit.

4.1 COMPLIANCE AUDIT PROCEDURES

The Compliance Audit at **Desert Power** was conducted in the three (3) phases summarized below.

Phase 1: Remote documentation review

An off-site, remote documentation review was conducted. The review included audit/inspection of documentation provided prior to the site visit in order to streamline the on-site audit and provide the auditor with some background of the facility's documentation.

Phase 2: On-site review of facility's records and personnel interviews

The on-site review of facility documentation occurred on December 9, 2021. A review/inspection of documentation, policies and procedures, and supporting records was completed to determine whether the RMP/PSM Program 3 implementation at the facility was consistent with the regulatory requirements. Furthermore, locations and availability of documentation to facility personnel was

also evaluated. Personnel interviews were completed, as necessary, to verify that documentation and records provided were accurate. Personnel were also interviewed to determine their knowledge and understanding of the RMP/PSM Program 3 requirements.

Phase 2: Finalization of Compliance Audit report

A draft of the Audit Findings was completed. The report indicates the team members and documents reviewed (and where the documents are located on-site), the personnel involved and any observations made. The comments also include a brief description of how each regulatory requirement was met. Any items found to be deficient were noted as a recommendation in the report. Prior to the Compliance Audit Report finalization, the recommendations in the Compliance Audit Report were reviewed and any comments or questions on the recommendations were answered. The intent was to review program deficiencies and to allow key individuals involved in the maintenance and implementation of the RMP/PSM program the opportunity to develop strategies for preventing future deficiencies and improving the overall programs.

Attachment A provides a copy of the worksheets that were used to log the findings of the Audit. The final recommendations are assigned by the facility to individuals responsible for follow-up and closure along with a target completion date. A list of the recommendations is included in Attachment B.

4.2 PARTICIPANTS

The following table identifies the Team Members that were involved in the Compliance Audit.

| NAME | TITLE | COMPANY |
|----------------|----------------------------------|-------------------------------|
| Ryan Bray | Technical Consultant, Auditor | Risk Management Professionals |
| Kevin Lawrence | Plant Manager | Desert View Power, Inc. |
| Louie Lopez | Controls/Supervisor | Desert View Power, Inc. |

4.3 DOCUMENTS REVIEWED

The following documents within **Desert View's** RMP/PSM Program 3 Compliance Audit documentation were requested and reviewed during the course of the audit:

- Safety Data Sheets (SDS)
- Piping and Instrumentation Diagrams (P&IDs)
- RMP Submittals / Hazard Assessments
- Previous Compliance Audit reports / OSHA Consultation reports
- Previous Process Hazard Analysis (PHA) reports
- Employee Participation procedures
- Hot Work Permit and Confined Space procedures
- Operating Procedures
- Training Documents / Records
- Maintenance Records including work orders
- Incident Investigation reports
- Management of Change forms
- Emergency Action Plan

5.0 RECOMMENDATIONS

Where RMP/PSM Program 3 documentation, records, or implementation were not readily available or demonstrated during the course of the Compliance Audit, a recommendation was made on actions to be taken to correct the deficiencies. A list of the recommendations can be found in Attachment B.

In order to close a recommendation the facility has to take action to meet the requirements of the stated recommendation. As part of the recommendation tracking, a brief summary on how and when the recommendation was closed, along with any supporting documentation should be documented in the recommendation tracking program. In addition, appropriate personnel should verify that the recommendation has been completed. As a best practice when addressing recommendations, not only should the immediate deficiency be closed (such as developing a missing procedure and completing a specific training interval), but also the root cause of the breakdown in the RMP/PSM Program that led to the deficiency should also be addressed.

6.0 COMPLIANCE AUDIT WORKSHEETS

During the course of the Compliance Audit, a worksheet was used to identify the demonstrated compliance of each RMP/PSM Program 3 element. In addition, comments were made on specifically how the Audit Team determined the requirement was met. These worksheets act as a roadmap to locate specific documentation and records. A copy of the Compliance Audit worksheets can be found in Attachment A.

ATTACHMENT A
COMPLIANCE AUDIT WORKSHEETS

**PSM/CALOSHA/RMP/CALARP PROGRAM 3
TRIENNIAL COMPLIANCE AUDIT WORKSHEETS**

| | |
|--|--|
| Compliance Audit Date(s) (actual dates the audit was conducted): | December 9, 2021 |
| Compliance Audit Report Date (date final audit report was prepared): | February 28, 2022 |
| Site Name & Address: | Desert View Power, Inc. – Biomass Power Generation Plant 62300 Gene Welmas Dr., Mecca, California 92254 |
| Processes reviewed during the audit: | Ammonia Injection System |
| Auditor | Ryan Bray, Senior Technical Consultant Risk Management Professionals |
| Audit Team Member(s) knowledgeable in the process: | Kevin Lawrence, Plant Manager Desert View Power, Inc. – Biomass Power Generation Plant |
| Other Audit Team Members: | Louie Lopez, Controls/Supervisor Desert View Power, Inc. – Biomass Power Generation Plant |

The following pages contain checklists that assure the procedures followed at the facility meet all applicable regulatory requirements. If a regulatory requirement is either not part of the facility's written procedures or not implemented, a recommendation should be made. The recommendation is an action that can be taken by the facility to correct the deficiency. Once the Compliance Audit is completed, the recommendations should be moved to the Action Tracking Log in order to track their progress and ensure that they are addressed.

| APPLICABILITY (APP) | | | | | |
|---------------------|--|---|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| APP-01 | CalARP 19CCR 2735.4 (a) | Does the stationary source have in a process more than a threshold quantity of a regulated substance as determined under T19 CCR §2770.2 and §2770.5? | Y | According to the Covered Process section of the Risk Management Plan (RMP) binder, the injection system contains a maximum intended inventory of approximately 54,120 pounds (lbs.) of anhydrous ammonia, which exceeds the CalARP threshold quantity. | |
| APP-02 | EPA 40CFR 68.10 (d) OSHA 29CFR 1910.119 (a) CalARP 19CCR 2735.4 (e)(2) CalIOSHA 8CCR 5189 (b) | Is the covered process subject to OSHA or Cal OSHA PSM standards? (29 CFR 1910.119 and T8 CCR §5189). | Y | According to the Covered Process section of the Risk Management Plan (RMP) binder, the injection system contains a maximum intended inventory of approximately 54,120 lbs. of anhydrous ammonia, which is above the Cal/OSHA and OSHA PSM threshold quantity. | |
| APP-03 | EPA 40CFR 68.10 (a) | Does the stationary source have in a process more than a threshold quantity of a regulated substance as determined under §68.115? | Y | According to the Covered Process section of the Risk Management Plan (RMP) binder, the injection system contains a maximum intended inventory of approximately 54,120 lbs. of anhydrous ammonia, which is above the EPA RMP threshold quantity | |

| MANAGEMENT (MGMT) | | | | | |
|-------------------|--|--|-----------------|--|---|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| MGMT-01 | EPA 40CFR 68.15 (a) CalARP 19CCR 2735.6 (a) | The owner, operator, or employer of a stationary source with processes subject to Program 2 or Program 3 shall develop a management system to oversee the implementation of the risk management program elements. | Y | According to the EPA RMP Submittal, the Safety Supervisor, Kit Blessing, has overall responsibility of the RMP Program. He is supported by the Plant Manager, Kevin Lawrence. | 2021.DVP.CA.001: update the entries assigning RMP responsibilities to Kit Blessing to the new Safety Supervisor. |
| MGMT-02 | EPA 40CFR 68.15 (b) CalARP 19CCR 2735.6 (b) | The owner, operator, or employer shall assign a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements. | Y | At the time of this report, Kit Blessing retired from the Safety Supervisory position. However, he is still support operations part-time. As such, he is still support Kevin Lawrence with RMP program items on an as-needed basis. At the time of this report, the role of Safety Supervisor was empty. Kevin Lawrence, currently, assumed full responsibility of the RMP Program. | |
| MGMT-03 | EPA 40CFR 68.15 (c) CalARP 19CCR 2735.6 (c) | When responsibility for implementing individual requirements of this part is assigned to persons other than the person identified under the regulations laid out in MGMT-02, the names or positions of these people shall be documented, and the lines of authority defined through an organization chart or similar document. | Y | The Management Section of the RMP Program Road Map contains an organization chart and outlines the responsibilities for the Safety Supervisor and Plant Manager. | |

HAZARD ASSESSMENT (HA)

NOTE: Per the Compliance Audit regulations, the Hazard Assessment Section is not part of the Prevention Program elements and is not required to be reviewed in the triennial Compliance Audit. The facility has willingly chosen to review the Hazard Assessment Section.

| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|-------|--|---|-----------------|--|-----------------|
| HA-01 | EPA 40CFR 68.22 CalARP 19CCR 2750.2 | The correct parameters shall be used in the Worst Case Scenario analysis as follows. | | | |
| | | Toxic Endpoints - those shown in Appendix A (EPA) or as defined in §2750.2 (CalARP) | Y | The Toxic Endpoints are denoted under Section 4.3 Table 5 Worst-Case Scenario Results Summary of the Hazard Assessment. | |
| | | Flammables: A) Explosion: an overpressure of 1 psi B) Radiant heat/exposure time: 5 kw/m² for 40 sec. C) Lower flammability limit: as provided in NFPA documents or other generally recognized sources. | NA | Ammonia is not classified as a flammable substance. The Worst-Case Release Scenario Dispersion Modeling Parameters located in Section 4.2; the Hazard Assessment denotes the following. <ul style="list-style-type: none">Windspeed of 1.5 meters per second (m/s).Stability Class as F.Ambient Temperature: 77 FHumidity of 50%.The height of release as ground level.The surface roughness as rural. | |
| | | Wind Speed - 1.5 m/s | Y | The modeling software RMP*Comp calculates the buoyancy internally, and therefore is not an output | |
| | | Stability Class - "F" NOTE: if the stationary source can demonstrate (written verification) that local meteorological data shows different values at all times during the three previous years, they may use the alternate meteorological conditions. | Y | | |
| | | Ambient Temperature – highest daily maximum temperature in previous three years or 25° C if EPA's RMP Guidance for Off-site Consequence Analysis or RMP*Comp is used. | Y | | |
| | | Humidity - average humidity for the site or 50% if EPA's RMP Guidance for Off-site Consequence Analysis is used. | Y | | |

HAZARD ASSESSMENT (HA)

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| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|-------|--|--|-----------------|--|-----------------|
| | | Height of Release - 0 feet (ground level) | Y | | |
| | | Surface Roughness - urban or rural, whichever is appropriate | Y | | |
| | | Buoyancy of Gas - dense or neutral, whichever is appropriate. | NA | | |
| | | Temperature of Released Substance – highest daily maximum temperature in the previous three years or at process temperature, boiling point for gases liquefied by refrigeration [T19 CCR §2750.3]. | Y | | |
| HA-02 | EPA 40CFR 68.39 CalARP 19CCR 2750.8 | The stationary source shall maintain the following records regarding Worst Case Scenario(s): | | | |
| | | A description of the vessel or pipeline and substance selected as worst case | Y | A detailed description of the vessel is denoted in Appendix A of the Hazard Assessment. | |
| | | Assumptions and parameters used | Y | The modeling assumptions and parameters used are located within Section 5.2 of the Hazard Assessment. | |
| | | The rationale for selection | Y | The rational for selection is found in Section 5.1 of the Hazard Assessment. | |
| | | Estimated quantity released, release rate, and duration of release | Y | The quantity released, release rate and duration of release is located in Appendix A of the Hazard Assessment. | |
| | | Methodology, including model used to determine distance to endpoints | Y | The methodology and model (RMP*Comp) used to determine distance endpoints is found under Table 4 of the Hazard Assessment. | |

HAZARD ASSESSMENT (HA)

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| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|-------|--|--|-----------------|--|-----------------|
| | | Data used to estimate population and environmental receptors | Y | MARPLOT, in conjunction with Google Earth/Yahoo Local was used to estimate the population, sensitive and environmental receptors, and is located in Section 6.3 of the Hazard Assessment. | |
| HA-03 | EPA 40CFR 68.28 (a) CalARP 19CCR 2750.4 (a) | The owner or operator shall identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes. | Y | One alternative release scenario was performed for the covered process and is located within Section 6 of the Hazard Assessment. | |
| HA-04 | EPA 40CFR 68.28 (b)(1) CalARP 19CCR 2750.4 (b)(1) | The Alternative Release Scenario(s) shall represent a scenario more likely than the worst case scenario release that could occur at the stationary source. | Y | The alternative scenario considered a seal leak within the system which is considered more likely than a full release of contents of the main storage vessel. | |
| HA-05 | EPA 40CFR 68.28 (c) CalARP 19CCR 2750.4 (c) | The correct parameters shall be used in the Alternative Release Scenario(s) analysis: | | | |
| | | Toxic Endpoints - those shown in Appendix A as defined in §2750.2. | Y | The Toxic Endpoints are denoted under Section 6.2 Table 6 Worst-Case Scenario Results Summary of the Hazard Assessment. | |
| | | Flammable Endpoints – vary according to the scenario studied: A) Explosion: an overpressure of 1 psi B) Radiant heat/exposure time: 5 kw/sq. m for 40 sec. C) Lower flammability limit: as provided in NFPA documents or other generally recognized sources. | NA | Ammonia is not classified as a flammable substance. The Worst-Case Release Scenario Dispersion Modeling Parameters located in Section 6.2; the Hazard Assessment denotes the following. | |

HAZARD ASSESSMENT (HA)

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| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|-----|-----------------------|---|-----------------|--|-----------------|
| | | Wind Speed - 3 m/s | Y | <ul style="list-style-type: none"> Windspeed of 3 meters per second (m/s). Stability Class as D. Ambient Temperature: 77 F Humidity of 50%. The height of release as determined by the scenario. The surface roughness as rural. <p>The modeling software RMP*Comp calculates the buoyancy internal, and therefore is not an output.</p> | |
| | | Stability Class - "D" | Y | | |
| | | Ambient Temperature – conservative temperature depending on the release scenario (consistent with meteorological conditions that could exist at the time of a release or could be affected by a release, e.g., slightly elevated temperature associated with a pooling liquid release or slightly lower temperature associated with an evaporating pressurized gas release) | Y | | |
| | | Humidity - typical ambient humidity measured at the stationary source or at a local meteorological station | Y | | |
| | | Height of Release - actual height of the release | Y | | |
| | | Surface Roughness - urban or rural, whichever is appropriate | Y | | |
| | | Buoyancy of Gas - dense or neutral, whichever is appropriate | NA | | |
| | | Temperature of Released Substance - process or ambient, whichever is appropriate for the scenario. [T19 CCR §2750.2 and Section 4.6, CalARP Program Guidance Document] | Y | | |

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| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|-------|--|---|-----------------|---|-----------------|
| HA-06 | EPA 40CFR 68.28 (d)(e) CalARP 19CCR 2750.4 (d)(e) | The following other sources shall be considered in selecting Alternative Release Scenario(s): | | | |
| | | The five-year accident history | Y | According to Section 6.1 of the Hazard Assessment, the selection process for the Alternative Release Scenario considered the following. <ul style="list-style-type: none">Past incident and near misses.Consequences considered in the unit.Process Hazard Analysis. Additionally, an operator response to detect and isolate the leak was taken credit as active mitigation. | |
| | | Failure scenarios identified in the PHA | Y | | |
| | | Mitigation effectiveness | Y | | |
| HA-07 | EPA 40CFR 68.39 CalARP 19CCR 2750.8 | The stationary source shall maintain the following records regarding Alternative Release Scenario(s): | | | |
| | | A description of the vessel or pipeline and substance selected as the alternative case. | Y | A detailed description of the seal leak is denoted in Appendix B of the Hazard Assessment. | |
| | | Assumptions and parameters used. | Y | The modeling assumptions and parameters used are located within Section 6.2 of the Hazard Assessment | |
| | | The rationale for selection | Y | The rationale for selection is found in Section 6.1 of the Hazard Assessment | |
| | | Estimated quantity released, release rate, and duration of release | Y | The quantity released, release rate and duration of release is located in Appendix B of the Hazard Assessment. | |
| | | Methodology, including model used to determine distance to endpoints | Y | The methodology and model (RMP*Comp) used to determine distance endpoints is found under Section 6.1 of the Hazard Assessment. | |

HAZARD ASSESSMENT (HA)

NOTE: Per the Compliance Audit regulations, the Hazard Assessment Section is not part of the Prevention Program elements and is not required to be reviewed in the triennial Compliance Audit. The facility has willingly chosen to review the Hazard Assessment Section.

| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|-------|--|--|-----------------|---|---|
| | | Data used to estimate population and environmental receptors | Y | MARPLOT, in conjunction with Google Earth/Yahoo Local was used to estimate the population, sensitive and environmental receptors, and is located in Section 7.3 of the Hazard Assessment. | |
| HA-08 | EPA 40CFR 68.36 (a) CalARP 19CCR 2750.7 (a) | The stationary source shall review and update the Off-site Consequence Analysis(es) at least once every five years. | Y | The Off-Site Consequence Analysis was last updated in October 2019. | |
| HA-09 | EPA 40CFR 68.30 CalARP 19CCR 2750.5 | Off-site Impacts – Population: | | | |
| | | The owner or operator shall estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in §68.22(a) and Section 2750.2(a) of CalARP. | Y | The Hazard Assessment includes a vulnerability zone map and a population estimate as part of the Appendixes A and B for the worst case and alternative case scenario, respectively. | 2021.DVP.CA.002: Update the estimated impact population in Table 8 of the Hazard Assessment and round to nearest two significant digits. |
| | | Population shall include residential population. The presence of institutions (schools, hospitals, prisons), parks and recreational areas, and major commercial, office, and industrial buildings shall be noted in the RMP. | Y | The offsite sensitive receptors are denoted in Section 7.3 Table 10 “Summary of Offsite Population Receptors” | |
| | | The owner or operator may use the most recent Census data, or other updated information, to estimate the population potentially affected. | Y | According to Section 7.1 the population was estimated using 2010 census tract data with the MARPLOT software. | |

HAZARD ASSESSMENT (HA)

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| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|-------|---|---|-----------------|---|-----------------|
| | | Population shall be estimated to two significant digits. | P | Table 8 demonstrates the projected population that would be impacted by the WCS. However, the projection is not estimated to two significant digits. The ARS did not have an estimated impact on the population. | |
| HA-10 | EPA 40CFR 68.33 CalARP 19CCCR 2750.7 | Off-site Impacts - Environment | | | |
| | | The owner or operator shall list in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in §68.22(a) and Section 2750.2(a) of CalARP. | Y | The Hazard Assessment includes a vulnerability zone map and a population estimate as part of Appendixes A and B for the worst case and alternative case scenario, respectively. The environmental receptors are denoted in Section 7.3, Table 10. | |
| HA-11 | EPA 40CFR 68.36 (b) CalARP 19CCCR 2750.7 (b) | If changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to endpoint by a factor of two or more, the stationary source shall: | | | |
| | | Complete a revised analysis within six months of the change | NA | No changes have been reported by the facility. | |
| | | Submit a revised RMP | NA | | |
| HA-12 | EPA 40CFR 68.42 (a) CalARP 19CCCR 2750.9 (a) | The stationary source shall include in the five-year accident history all accidental releases from covered processes that resulted in one or more of the following: | | | |
| | | On-site or off-site deaths | NA | According to Kevin Lawrence and Louie Lopez during onsite interviews, there have been no reportable accidental releases of ammonia for the ammonia injection system that resulted in one or more of the cases depicted in EPA | |
| | | On-site or off-site injuries | NA | | |
| | | Significant on-site property damage | NA | | |

HAZARD ASSESSMENT (HA)

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| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations | |
|-------|--|--|-----------------|---|-----------------|--|
| | | Property damage off-site | NA | 40CFR 68.42 (a) and CalARP 19CCR 2750.9 (a). | | |
| | | Evacuations | NA | | | |
| | | Sheltering-in-place | NA | | | |
| | | Environmental damage | NA | | | |
| HA-13 | EPA 40CFR 68.42 (b) CalARP 19CCR 2750.9 (b) | For each accidental release included in the history, the stationary source shall record the following: | | | | |
| | | Date, time and approximate duration of the release | NA | According to Kevin Lawrence and Louie Lopez during onsite interviews, there have been no reportable accidental releases of ammonia for the ammonia injection system within the past five years. | | |
| | | Regulated substance(s) released | NA | | | |
| | | Estimated quantity released in pounds | NA | | | |
| | | Five- or six-digit NAICS code that most closely responds to the process | NA | | | |
| | | Type of release event and its source | NA | | | |
| | | Weather conditions, if known | NA | | | |
| | | On-site impacts | NA | | | |
| | | Known off-site impacts | NA | | | |
| | | Initiating event and contributing factors, if known | NA | | | |
| | | Whether off-site responders were notified, if known | NA | | | |

HAZARD ASSESSMENT (HA)

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| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|-----|-----------------------|--|-----------------|----------|-----------------|
| | | Operational or process changes that resulted from investigation of the release | NA | | |

SUBMITTAL (SUB)

NOTE: Per the Compliance Audit regulations, the Submittal Section is not part of the Prevention Program elements and is not required to be reviewed in the triennial Compliance Audit. The facility has willingly chosen to review the Submittal Section.

| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|--------|---|--|-----------------|---|-----------------|
| SUB-01 | EPA 40CFR 68.155 CalARP 19CCR 2745.3 | The owner or operator shall provide in the RMP, for all Program levels, an executive summary that includes a brief description of the following elements: | | | |
| | | The accidental release prevention and emergency response policies at the stationary source; | Y | All applicable fields were discussed in the 2020 EPA RMP submittals which was maintained under the Submittal tab in the RMP binder. | |
| | | The stationary source and regulated substances handled; | Y | | |
| | | The general accidental release prevention program and chemical-specific prevention steps; | Y | | |
| | | The five-year accident history; | Y | | |
| | | The emergency response program; and | Y | | |
| | | Planned changes to improve safety. CalARP: This section of the executive summary should list or review the findings of the hazard review or process hazard analysis, including those that need correction. This part of the RMP should best be used to satisfy the requirements of 2760.2(e) for Program 3, regarding what was identified as needing improvement and setting a schedule for getting it done. | Y | | |

SUBMITTAL (SUB)

NOTE: Per the Compliance Audit regulations, the Submittal Section is not part of the Prevention Program elements and is not required to be reviewed in the triennial Compliance Audit. The facility has willingly chosen to review the Submittal Section.

| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|--------|---|---|-----------------|---|-----------------|
| SUB-02 | EPA 40CFR 68.165 CalARP 19CCR 2745.4 | The owner or operator shall submit all necessary Off-site Consequences Data as part of 2745.4 or 68.165 | | | |
| | | One worst-case release scenario for each toxic and flammable substance above the threshold quantity. | Y | All applicable fields were discussed in the 2020 EPA RMP submittals which was maintained under the Submittal tab in the RMP binder. | |
| | | One alternative release scenario for each toxic and flammable substance above the threshold quantity. | Y | | |
| | | Chemical name; | Y | | |
| | | Percentage weight of the chemical in a liquid mixture (toxics only); | Y | | |
| | | Physical state (toxics only); | Y | | |
| | | Basis of results; | Y | | |
| | | Scenario (explosion, fire, toxic gas release, or liquid spill and evaporation); | Y | | |
| | | Quantity released in pounds; | Y | | |
| | | Release rate; | Y | | |
| | | Release duration; | Y | | |
| | | Wind speed and atmospheric stability class (toxics only); | Y | | |
| | | Topography (toxics only); | Y | | |
| | | Distance to endpoint; | Y | | |

SUBMITTAL (SUB)

NOTE: Per the Compliance Audit regulations, the Submittal Section is not part of the Prevention Program elements and is not required to be reviewed in the triennial Compliance Audit. The facility has willingly chosen to review the Submittal Section.

| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|--------|---|---|-----------------|---|-----------------|
| | | Public and environmental receptors within the distance; | Y | | |
| | | Passive mitigation considered; and | Y | | |
| | | Active mitigation considered (alternative releases only) | Y | | |
| SUB-03 | EPA 40CFR 68.168 CalARP 19CCR 2745.5 | The owner or operator shall submit as part of the RMP the information required by Section 2750.9(b) on each accident covered by Section 2750.9(a) or 68.42(b) See HA-12 and HA-13 . | NA | According to Kevin Lawrence and Louie Lopez during onsite interviews, there have been no reportable accidental releases of ammonia for the ammonia injection system within the past five years. | |
| SUB-04 | EPA 40CFR 68.180 (a) CalARP 19CCR 2745.8 (a) | All applicable Emergency Response Program Components are listed. | | | |
| | | Do you have a written emergency response plan? | Y | All applicable fields were discussed in the 2020 EPA RMP Submittal, which was maintained under the Submittal tab in the RMP binder. | |
| | | Does the plan include specific actions to be taken in response to an accidental release of a regulated substance? | Y | | |
| | | Does the plan include procedures for informing the public and local agencies responsible for responding to accidental releases? | Y | | |
| | | Does the plan include information on emergency health care? | Y | | |
| | | The date of the most recent review or update of the emergency response plan; | Y | | |

SUBMITTAL (SUB)

NOTE: Per the Compliance Audit regulations, the Submittal Section is not part of the Prevention Program elements and is not required to be reviewed in the triennial Compliance Audit. The facility has willingly chosen to review the Submittal Section.

| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
|--------|---|---|-----------------|---|-----------------|
| | | The date of the most recent emergency response training for employees. | Y | | |
| SUB-05 | EPA 40CFR 68.180 (b) CalARP 19CCR 2745.8 (b) | The owner or operator shall provide the name and telephone number of the local agency with which emergency response activities and the emergency response plan is coordinated. | Y | All applicable fields were discussed in the 2020 EPA RMP Submittal, which was maintained under the Submittal tab in the RMP binder. | |
| SUB-06 | EPA 40CFR 68.180 (c) CalARP 19CCR 2745.8 (c) | The owner or operator shall list other Federal or state emergency plan requirements to which the stationary source is subject. | Y | All applicable fields were discussed in the 2020 EPA RMP Submittal, which was maintained under the Submittal tab in the RMP binder. | |
| SUB-07 | EPA 40CFR 68.185 CalARP 19CCR 2745.9 | The owner or operator shall submit in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete. | Y | All applicable fields were discussed in the 2020 EPA RMP Submittal, which was maintained under the Submittal tab in the RMP binder. | |

| PROCESS SAFETY INFORMATION (PSI) | | | | | |
|----------------------------------|--|--|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| PSI-01 | EPA 40 CFR 68.65 (a) OSHA 29 CFR 1910.119 (d) CalOSHA 8 CCR 5189 (d) CalARP 19 CCR 2760.1 (a) | <p>The owner, operator, or employer shall complete a compilation of written process safety information before conducting any process hazard analysis (PHA) required by the standard. This process safety information shall include information pertaining to the hazards of the highly hazardous chemicals used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process.</p> <p>CalOSHA also requires that the employer shall provide for employee participation in this process. Copies of this safety information shall be made accessible and communicated to employees involved in the processes.</p> | Y | <p>The Process Safety Information (PSI) documentation can be found within the CalARP/RMP/PSM Binder. The PSI documentation includes information pertaining to the hazards of the regulated substance as well as information regarding the technology and equipment used in the process. Please refer to individual regulatory references/requirements detailed below.</p> <p>PSI information is available at any time for employees. Information can be requested from the Facilities & Safety Officer at the facility. This was confirmed during onsite interviews with Kevin Lawrence and Louie Lopez.</p> | |
| PSI-02 | EPA 40 CFR 68.65 (b) OSHA 29 CFR 1910.119 (d)(1) CalOSHA 8 CCR 5189 (d)(1) CalARP 19 CCR 2760.1 (b) | <p>Information pertaining to the hazards of the regulated substances in the process shall consist of at least the following:</p> <p>Note: Safety Data Sheets meeting the requirements of 29 CFR 1910.1200(g) may be used to comply with this requirement to the extent they contain the information required by this subparagraph.</p> | | | |
| | | Toxicity information; | Y | <p>RMP/PSM Binder in the PSI Section on page 2, and it addresses:</p> <ul style="list-style-type: none"> • Toxicity information; • Permissible exposure limits; • Physical data; • Reactivity data; • Corrosivity data; • Thermal and chemical stability data; and | |
| | | Permissible exposure limits; | Y | | |
| | | Physical data; | Y | | |
| | | Reactivity data; | Y | | |
| | | Corrosivity data; | Y | | |

| PROCESS SAFETY INFORMATION (PSI) | | | | | |
|----------------------------------|---|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | Thermal and chemical stability data; and | Y | <ul style="list-style-type: none">Hazardous effects of inadvertent mixing/incompatible mixtures of different materials that could foreseeably occur. In addition, the PSI section includes an anhydrous ammonia Safety Data Sheet (SDS). | |
| | | Hazardous effects of inadvertent mixing of different materials that could foreseeably occur. | Y | | |
| PSI-03 | EPA 40 CFR 68.65 (c) OSHA 29 CFR 1910.119 (d)(2) Cal/OSHA 8 CCR 5189 (d)(2) CalARP 19 CCR 2760.1 (c) | Information concerning the technology of the process shall include at least the following: Note: Where the original technical information no longer exists, such information may be developed in conjunction with the process hazard analysis in sufficient detail to support the analysis. Cal OSHA: For processes for which data is unavailable, the information concerning the technology of the process may be developed from a process hazard analysis conducted in accordance with 8CCR 5189 Subsection (e). | | | |
| | | A block flow diagram or simplified process flow diagram; | Y | The facility maintains a basic plant diagram which includes the Ammonia (SNCR) system. The diagram is kept on the server and in the Plant Managers office. | |
| | | Process chemistry; | Y | A description of the process chemistry is included in Subsection 5.1 of the PSI section of the RMP binder. | |
| | | Maximum intended inventory; | Y | Maximum intended inventory for the ammonia system can be found in Subsection 5.2 of the PSI section of the RMP binder. | |
| | | Safe upper and lower limits for process variables such as temperatures, pressures, flows, levels, and/or compositions; and, | Y | Considerations for Safe Upper and Lower limits and be found in Subsection 5.3 of the PSI section of the RMP binder. Specific information can be found in the equipment manuals for each piece of equipment. | |
| | | An evaluation of the consequences of deviations; including those affecting the safety and health of the employees. | Y | An evaluation of the consequences of deviations can be found in Subsection 5.3 of the PSI section of the RMP binder. Specific information can be | |

| PROCESS SAFETY INFORMATION (PSI) | | | | | |
|----------------------------------|--|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | | | found in the equipment manuals for each piece of equipment. | |
| PSI-04 | EPA 40 CFR 68.65 (d) OSHA 29 CFR 1910.119 (d)(3) CalOSHA 8 CCR 5189 (d)(3) CalARP 19 CCR 2760.1 (d) | Information concerning the equipment of the process shall include at least the following: | | | |
| | | Materials of construction; | Y | Specifics on the materials of construction were not present in the Plan. However, the Plan states the equipment was designed and installed according to ASME unfired pressure vessel code, and applicable portions of ANSI B31, ANSI K61.1 and California Title 8, Subchapter 1, Article 4 which includes guidance for materials of construction. | |
| | | Piping and instrument diagrams (P&ID's); | Y | The Piping and Instrument Diagrams (P&IDs) are located in Appendix A of the RMP binder. | |
| | | Electrical classification; | Y | Electrical classification is documented in Section 6.3 of the PSI tab in the RMP binder. | |
| | | Relief system design and design basis; | Y | The PSI section states, "Pressure relief valves are located on the ammonia storage tank and set at 265 pounds per square inch (psig). Excess flow valves are also installed at pertinent parts of the system for additional safeguarding" which meets this requirement. | |
| | | Ventilation system design; | NA | The ammonia tank is located outdoors and would release into the atmosphere. No ventilation system is applicable. | |
| | | Design codes and standards employed; Cal OSHA: Design codes employed including design conditions and operating limits | Y | A list of design codes and standards employed for the Ammonia Injection System is available in Section 6.2 of the PSI section of the RMP binder. | |

| PROCESS SAFETY INFORMATION (PSI) | | | | | |
|----------------------------------|-----------------------|--|-----------------|--|---|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | Material and energy balances for processes built after June 21, 1999 (May 26, 1992 for OSHA and September 1, 1992 for Cal OSHA) | NA | The P&IDs indicate the facility was built circa 1990 and therefore this element does not apply. | |
| | | Safety systems (e.g. interlocks, detection or suppression systems). Cal OSHA additionally requires Electrical supply and distribution systems | Y | Safety systems are detailed in Section 6.3 of the PSI section of the RMP binder. The section considers fire alarms, deluge sprinkler systems, gas sensors, and fire extinguishers, as well as includes a list of alarm set points and triggers. | |
| | | The owner, operator, or employer shall document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP). | P | There is a certification statement at the beginning of the PSI tab in the RMP binder stating that: "The owner/operator certifies that the system is designed in compliance with recognized and generally accepted good engineering practices and is designed to address industry specific design codes and standards." This section was not signed. | 2021.DVP.CA.003: Review the PSI information for accuracy and sign the certification statement. |
| | | For existing equipment designed and constructed in accordance with codes, standards, or practices that are no longer in general use, the owner, operator, or employer shall determine and document that the equipment is designed, maintained, inspected, tested, and operating in a safe manner. Cal OSHA: The employer shall document that the equipment complies <u>with the criteria established above in accordance</u> with recognized and generally accepted good engineering practices. 0 | P | There is a certification statement at the beginning of the PSI tab in the CalARP/RMP/PSM binder stating that: "The owner/operator certifies that the system is designed in compliance with recognized and generally accepted good engineering practices and is designed to address industry specific design codes and standards. The system complies with OSHA PSM and RMP requirements, The system is designed to address industry specific design codes and standards." Upon review of this section, the certification statement was unsigned. | See recommendation 2021.DVP.CA.003 |

| PROCESS HAZARD ANALYSIS (PHA) | | | | | |
|-------------------------------|--|--|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| PHA-01 | EPA 40CFR 68.67 (a) OSHA 29CFR 1910.119 (e)(1) CalARP 19CCR 2760.2 (a) | <p>The owner, operator, or employer shall perform an initial process hazard analysis (hazard evaluation) on processes covered by this standard. The process hazard analysis shall be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process. Employers shall determine and document the priority order for conducting process hazard analyses based on a rationale which includes such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process.</p> <p>CalARP: The PHA shall be conducted as soon as possible during the development of the CalARP Program, but not later than the date of submittal of the RMP. Notwithstanding Section (c) below, PHAs completed to comply with Section 5189 of Title 8 of CCR are acceptable as initial PHAs. These PHAs shall be updated and revalidated, based on their completion date.</p> | Y | The 2019 PHA for the Ammonia Injection System was performed on October 22, 2019 and can be found in the RMP/PSM/CalARP binder. All other PHA reports can be found on the server and in the Plant Manager's office. | |

| PROCESS HAZARD ANALYSIS (PHA) | | | | | |
|-------------------------------|--|---|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| PHA-02 | EPA 40CFR 68.67 (b) OSHA 29CFR 1910.119 (e)(2) CalOSHA 8CCR 5189 (e)(1) CalARP 19CCR 2760.2 (b) | <p>The owner, operator, or employer shall use one or more of the following methodologies that are appropriate to determine and evaluate the hazards of the process being analyzed:</p> <p>A) What-If; B) Checklist; C) What-If/Checklist; D) Hazard and Operability Study (HAZOP); E) Failure Mode and Effects Analysis (FMEA); F) Fault Tree Analysis; or G) An appropriate equivalent methodology.</p> <p>CalARP: The owner or operator shall work closely with the AAs in deciding which PHA methodology is best suited to determine the hazards of the process being analyzed.</p> | Y | <p>The 2019 PHA conducted at the facility utilized a combination of the Hazard and Operability Study (HAZOP) and What-If/Checklist methodology.</p> <p>According to the onsite interview with Kevin Lawrence, the local AA is always invited to the PHA Study. If unable to attend, the local AA is provided with the dates of the study and the methodology applied in the study</p> | |
| PHA-03 | EPA 40CFR 68.67 (c) OSHA 29CFR 1910.119 (e)(3) CalOSHA 8CCR 5189 (e)(2) CalARP 19CCR 2760.2 (c) | The process hazard analysis shall address: | | | |
| | | The hazards of the process; | Y | <p>Hazards of the process are described throughout the Consequences/Hazards Section of the reviewed PHA worksheets. The possible effects on safety and health are evaluated in the PHA and risk ranked according to severity and likelihood. Releases of regulated substances are evaluated in the facility Hazard Assessment, which is revalidated every five-years or as required by the Management of Change (MOC) process.</p> | |

| PROCESS HAZARD ANALYSIS (PHA) | | | | | |
|-------------------------------|-----------------------|---|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | The identification of any previous incident which had a likely potential for catastrophic consequences in the workplace; | Y | Previous incidents at the facility were discussed during the general checklist/node portion of the PHA. It was noted that there have not been any reportable releases within the five (5) years prior to the PHA. | |
| | | Engineering and administrative controls applicable to the hazards and their interrelationships such as appropriate application of detection methodologies to provide early warning of releases. (Acceptable detection methods might include process monitoring and control instrumentation with alarms, and detection hardware such as hydrocarbon sensors.); | Y | Engineering and administrative controls were discussed and denoted as safeguards during the most recent PHA in 2019. | |
| | | Consequences of failure of engineering and administrative controls; | Y | Based on a review of the 2019 PHA worksheets, consequences of failure of engineering and administrative controls were implicitly discussed during the PHA. | |
| | | Facility siting; | Y | Based on a review of the 2019 PHA worksheets, facility siting issues were discussed in the "Facility Siting – Checklist" node. | |
| | | Human factors; and | Y | Based on a review of the 2019 PHA worksheets, human factors issues were discussed in the "Human Factors– Checklist" node. | |
| | | A qualitative evaluation of a range of the possible safety and health effects of failure of controls on employees in the workplace. | Y | Based on a review of the 2019 PHA worksheets, a qualitative risk ranking matrix was applied to scenarios of concern developed during the most recent PHAs. | |

| PROCESS HAZARD ANALYSIS (PHA) | | | | | |
|-------------------------------|--|---|-----------------|---|--|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | CalARP: The PHA shall include the consideration of external events, including seismic events, if applicable. PHAs completed for other programs where external events were not considered shall be updated to include external events. | Y | Based on a review of the 2019 PHA worksheets, external events were discussed in the "What-If/Checklist for External Events" node. | |
| PHA-05 | EPA 40CFR 68.67 (d) OSHA 29CFR 1910.119 (e)(4) CalOSHA 8CCR 5189 (e)(3) CalARP 19CCR 2760.2 (d) | The process hazard analysis shall be performed by a team with expertise in engineering and process operations, and the team shall include at least one employee who has experience and knowledge specific to the process being evaluated. The team shall also include one member knowledgeable in the specific process hazard analysis methodology being used. | Y | The 2019 PHA was conducted with personnel representing engineering as well as operation of the process in use at the facilities. The names and expertise are noted in the 2019 PHA report. | |
| PHA-06 | EPA 40CFR 68.67 (e) OSHA 29CFR 1910.119 (e)(5) CalOSHA 8CCR 5189 (e)(4) CalARP 19CCR 2760.2 (e) | The owner, operator, or employer shall establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. | P | <p>The Safety Supervisor or designee keeps track of all the recommendations at the facility. PHA recommendations are tracked using a PHA Recommendation Tracking form that is completed with each PHA. A copy of the Action Tracking Log is located in Appendix B of the 2019 PHA.</p> <p>The 2019 PHA contained one recommendation to update the P&IDs to re-designate "snappy joe." The P&IDs available during this audit contained the hand-written re-designations. It is unclear whether the re-designation were made electronically to the master file.</p> | 2021.DVP.CA.004 Ensure the re-designations are made electronically on the master P&ID file. |

| PROCESS HAZARD ANALYSIS (PHA) | | | | | |
|-------------------------------|--|--|-----------------|--|--|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | CalARP: Complete these actions on a timetable agreed upon with the AA, or within two and one half (2.5) years of performing the PHA, or the next planned turnaround, for those items that require a turnaround; document the final resolution taken to address each recommendation and actual completion date; and communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. <i>The above timelines shall not apply to any process hazard analysis completed prior to January 1, 2015.</i> | | | |
| PHA-07 | EPA 40CFR 68.67 (f) OSHA 29CFR 1910.119 (e)(6) CalOSHA 8CCR 5189 (e)(5) CalARP 19CCR 2760.2 (f) | At least every five (5) years, the process hazard analysis shall be updated and revalidated, by a team meeting the requirements in OSHA 29CFR 1910.119(e)(4), to assure that the process hazard analysis is consistent with the current process. CalARP: Notwithstanding Section (c), updated and revalidated PHA[s] completed to comply with Section 5189 of Title 8 of CCR are acceptable to meet the requirements of this section. | P | There has only been one (1) PHA update at Desert View Power, Inc. since the 1991 HAZOP Study. The PHA update was conducted on October 22, 2019. The next PHA is due on or before October 22, 2024. | 2021.DVP.CA.005: Develop a mechanism to ensure PHAs are completed every five (5) years. |
| PHA-08 | EPA 40CFR 68.67 (g) | The owner, operator, or employer shall retain PHAs and updates or revalidations for each process covered by this section, as well as the documented resolution of | Y | The Safety Supervisor or designee keeps track of all PHA documentation for the facility. Currently, the position of Safety Supervisor is empty and the PHA documentation is managed by the Plant | |

| PROCESS HAZARD ANALYSIS (PHA) | | | | | |
|-------------------------------|---|--|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | OSHA 29CFR 1910.119 (e)(7) CalOSHA 8CCR 5189 (e)(6) CalARP 19CCR 2760.2 (g) | recommendations described in OSHA 29CFR 1910.119 (e)(5), for the life of the process. | | Manager. PHA documentation is kept on the server and in the Plant Manager's office. | |
| PHA-09 | CalOSHA 8CCR 5189 (e)(7) | Upon request of any worker or any labor union representative of any worker in the area, the employer shall provide or make available a copy of the employer's RMP. | Y | The RMP, including PHA documentation, is available on the company server and hardcopies are available upon request to the Plant Manager. | |

| OPERATING PROCEDURES (OP) | | | | | | |
|---------------------------|--|--|-----------------|---|-----------------|--|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations | |
| OP-01 | EPA 40CFR 68.69 (a) OSHA 29CFR 1910.119 (f)(1) CalOSHA 8CCR 5189 (f)(1) CalARP 19CCR 2760.3 (a) | The owner, operator or employer shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements. | Y | Operating Instructions (OIs) are developed and use on-site to provide instruction on operations and specific procedures during system operations. During an onsite interview with Louie Lopez, it was confirmed personnel are knowledgeable of and follow written procedures. | | |
| | | Steps for each operating phase: | | | | |
| | | Initial startup; | Y | OI-46A, "Thermal Denox" and OI-46B, "Ammonia Unloading" contain directions for the following. <ul style="list-style-type: none">Initial start-upNormal operationsTemporary operationsEmergency ShutdownEmergency operationsNormal shutdownStartup following turnaround/e-shutdown It is assumed that the listed OIs are representative of other OIs required under the same regulations and requirements. | | |
| | | Normal operations; | Y | | | |
| | | Temporary operations; | Y | | | |
| | | Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner. | Y | | | |
| | | Emergency operations; | Y | | | |
| | | Normal shutdown; and, | Y | | | |
| | | Startup following a turnaround, or after an emergency/partial shutdown. | Y | | | |
| | | Operating limits: | | | | |
| | | Consequences of deviation; and | Y | OI-46A, "Thermal Denox" and OI-46B, | | |

| OPERATING PROCEDURES (OP) | | | | | |
|---------------------------|--|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | Steps required to correct or avoid deviation. | Y | “Ammonia Unloading” contain operating limits including consequences of deviation and the steps required to correct or avoid deviation. It is assumed that the listed OIs are representative of other OIs required under the same regulations and requirements. | |
| | | Safety and health considerations: | | | |
| | | Properties of, and hazards presented by, the chemicals used in the process; | Y | OI-46A, “Thermal Denox” and OI-46B, “Ammonia Unloading” contain all the required safety and health considerations. It is assumed that the listed OIs are representative of other OIs required under the same regulations and requirements. | |
| | | Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment; | Y | | |
| | | Control measures to be taken if physical contact or airborne exposure occurs; | Y | | |
| | | Quality control for raw materials and control of hazardous chemical inventory levels; and, | Y | | |
| | | Any special or unique hazards. | Y | | |
| | | Safety systems and their functions. | Y | | |
| OP-02 | EPA 40CFR 68.69 (b) OSHA 29CFR 1910.119 (f)(2) Cal OSHA 8CCR 5189 (f)(2) | Operating procedures shall be readily accessible to employees who work in or maintain a process. | Y | Operating procedures are readily accessible to personnel onsite in the control room. | |

| OPERATING PROCEDURES (OP) | | | | | |
|---------------------------|---|---|-----------------|---|--|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | CalARP 19CCR 2760.3 (b) | | | | |
| OP-03 | EPA 40CFR 68.69 (c) OSHA 29CFR 1910.119 (f)(3) Cal OSHA 8CCR 5189 (f)(3) CalARP 19CCR 2760.3 (c) | The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to facilities. The owner, operator or employer shall certify annually that these operating procedures are current and accurate. | Y | Operating procedures are updated when any change in the process requires new or revised operating procedures. They are certified annually that they are current and accurate. Confirmation of certification was provided verbally by Kevin Lawrence and Louie Lopez during onsite interviews. Documentation of review was not available at the time of this audit. There have been no recent changes to the system to verify documentation of procedure updates. However, the system to update procedures is in place. | 2021.DVP.CA.006: Ensure annual certification of operating procedure review is documented. |
| OP-04 | EPA 40CFR 68.69 (d) OSHA 29CFR 1910.119 (f)(4) CalOSHA 8CCR 5189 (f)(4) CalARP 19CCR 2760.3 (d) | The owner, operator or employer shall develop and implement safe work practices to provide for the control of hazards during operations such as: A) Lockout/tag out B) Confined space entry; C) Opening process equipment or piping; and D) Control over entrance into a stationary source (facilities) by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees. | Y | Associated safety procedures, such as lockout/tagout, hot work and procedures for the control over entrance into a facility by maintenance, contractor, or other support personnel, are in place. | |

| TRAINING (TRN) | | | | | |
|----------------|--|---|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| TRN-01 | EPA 40CFR 68.71 (a) OSHA 29CFR 1910.119 (g)(1) CalOSHA 8CCR 5189 (g)(1) CalARP 19CCR 2760.4 (a) | Initial training: | Y | <p>All employees at Desert View Power receive some level of training as it relates to the regulated substances and process. More details on the training program policies and requirements are located in the Injury and Illness Prevention Plan (IIPP) and the Safety Manual. Those employees that are involved with the day-to-day operation and maintenance of the regulated process receive training on Operating Procedures applicable to their job.</p> <p>All employees are required to review the Safety Manual. Regardless of whether employees' interface with the process or not, they receive general awareness training.</p> <p>Additionally, copies of Ammonia Awareness training comprehension exams and signed statements that employees have reviewed the Safety Manual will stand as record of the training employees receive.</p> <p>GPI Learning records (from GPI Learning Plus, an inline training platform) were included as part of this audit demonstrated completed online training for multiple topics including confined space awareness, understanding P&IDs, respirator training (basic), Valves/Traps/Piping exam, as well as other topics. In addition, records included a mechanism for tracking refresher training dates.</p> | |
| | | <p>Each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, shall be trained in an overview of the process and in the operating procedures as specified in 19CCR 2760.3, OSHA 29CFR 1910.119 (f) and §68.69/paragraph (f) of this section. The training shall include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.</p> <p>In lieu of initial training for those employees already involved in operating a process on May 26, 1992 an employer may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures.</p> <p>Note: June 21, 1999 in CalARP</p> | | | |

| TRAINING (TRN) | | | | | |
|-----------------|---|---|-----------------|--|---|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | | | According to onsite interviews with Kevin Lawrence and Louie Lopez, Ammonia Awareness and SCR specific training is provided in-person and therefore not included in the GPI learning records. | |
| ZZZq2wsZ r4r | EPA 40CFR 68.71 (b) OSHA 29CFR 1910.119 (g)(2) Cal OSHA 8CCR 5189 (g)(2) CalARP 19CCR 2760.4 (b) | Refresher training: | | | |
| | | Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The employer, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training. | Y | GPI learning records were included as part of this audit demonstrated completed online training for multiple topics including confined space awareness, understanding P&IDs, respirator training (basic), Valves/Traps/Piping exam, as well as other topics. In addition, records included a separate column highlighting refresher training dates. The column served as a tracking mechanism. | |
| TRN-03 | EPA 40CFR 68.71 (c) OSHA 29CFR 1910.119 (g)(3) Cal OSHA 8CCR 5189 (g)(3) CalARP 19CCR 2760.4 (c) | <u>Training documentation:</u> The owner, operator or employer shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The owner or operator shall prepare and maintain records that contain: | | | |
| | | The identity of the employee; | Y | During normal circumstances, records of operator training are the responsibility of the Safety Supervisor and will be maintained for at least three years. Training records are kept in the Safety Supervisor's office. At the time of this report, the Safety Supervisor position was vacant and the responsibility. | 2021.DVP.CA.007: Ensure training records for the ammonia system are maintained and complete. |
| | | The date of training; and | Y | | |
| | | The means used to verify that the employee understood the training. | Y | | |
| | | Cal OSHA: Signatures of the persons administering the training. | P | Only examples of online training were present during the audit. Training records may have been available, but in the absence of a Safety Supervisor, were not readily available. | |

| TRAINING (TRN) | | | | | |
|----------------|---------------------------|---|-----------------|--|----------------------------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| TRN-04 | Cal OSHA 8CCR 5189 (g)(4) | Testing procedures shall be established by each employer to ensure competency in job skill levels and safe and healthy work practices | P | Only examples of online training were present during the audit. Training records may have been available, but in the absence of a Safety Supervisor, were not readily available. | See 2021.DVP.CA.007 above |

| MECHANICAL INTEGRITY (MI) | | | | | |
|---------------------------|---|---|-----------------|--|---|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| MI-01 | EPA 40CFR 68.73 (a) OSHA 29CFR 1910.119 (j)(1) CalARP 19CCR 2760.5 (a) | <u>Application.</u> Paragraphs (j)(2) through (j)(6) (OSHA 29 CFR 1910.119) and paragraphs (b) through (f) (EPA RMP) of this section apply to the following process equipment: E) Pressure vessels and storage tanks; F) Piping systems (including piping components such as valves); G) Relief and vent systems and devices; H) Emergency shutdown systems; I) Controls (including monitoring devices and sensors, alarms, and interlocks) and Pumps. J) CalARP: Compressors and their drivers | | | |
| MI-02 | EPA 40CFR 68.73 (b) OSHA 29CFR 1910.119 (j)(2) Cal OSHA 8CCR 5189 (j)(1) CalARP 19CCR 2760.5 (b) | Written procedures: | | | |
| | | The owner, operator, or employer shall establish and implement written procedures to maintain the on-going integrity of process equipment. | Y | Preventive maintenance and inspection procedures are in the Mechanical Integrity section of the RMP binder. Process equipment includes the Ammonia Storage Tank, Ammonia Vaporizer, piping system, relief and vent system/devices, emergency shutdown systems, and controls. Work orders are organized through spreadsheets that allow staff to track open/close maintenance and inspection tasks. A copy of the open work order list was reviewed as part of this audit and included records of maintenance / inspection tasks generated between August and December 2021. | |
| | | Cal OSHA: Procedures shall include a method: for allowing employees to identify and report potentially faulty or unsafe equipment; and | P | Based on feedback from Kevin Lawrence in an onsite interview, the facility has an "open-door" policy and employees can bring concerns to their supervisors or directly to the Plan Manager for review, either verbally or in writing. | 2021.DVP.CA.008: Consider including a short description of company policy for hazardous working environmental conditions in the MI section of the MI binder. |

| MECHANICAL INTEGRITY (MI) | | | | | |
|---------------------------|--|--|-----------------|---|---|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | | | Although the procedure is in place, the open/door policy is not mentioned in the RMP binder. | |
| | | Cal OSHA: To record their observations and suggestions in writing. | P | Based on feedback from onsite interviews, the facility has an "open-door" policy and employees can bring concerns to their supervisors or directly to the Plan Manager for review; either verbally or in writing. Although the procedure is in place, the policy is not mentioned in the RMP binder. | See Recommendation 2021.DVP.CA.008 Above |
| | | Cal OSHA: The employer shall respond regarding the disposition of the employee's concerns contained in the report(s) in a timely manner. | P | Based on feedback from onsite interviews, the facility has an "open-door" policy and employees can bring concerns to their supervisors or directly to the Plan Manager for review; either verbally or in writing. Although the procedure is in place, the policy is not mentioned in the RMP binder. | See Recommendation 2021.DVP.CA.008 Above |
| | | Cal OSHA: The employer shall provide employees and their representatives access to the information. | Y | Based on feedback from onsite interviews, the facility has an "open-door" policy which allows for any process information to be shared with all staff. | |
| MI-03 | EPA 40CFR 68.73 (c) OSHA 29CFR 1910.119 (j)(3) CalARP 19CCR 2760.5 (c) | Training for process maintenance activities: | | | |
| | | The owner, operator, or employer shall train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner. | Y | Based on feedback from an onsite interview with Louie Lopez, on-the-job training is provided after hire and as needed. New-hire training can last approximately two (2) weeks or until management is confident in the competency of the new staff. The GPI Training Records which were reviewed as part of this audit contained | |

| MECHANICAL INTEGRITY (MI) | | | | | |
|---------------------------|--|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | | | some relevant topics which verified that training is occurring. | |
| MI-04 | EPA 40CFR 68.73 (d) OSHA 29CFR 1910.119 (j)(4) CalOSHA 8CCR 5189 (j)(2) CalARP 19CCR 2760.5 (d) | Inspection and testing: | | | |
| | | Inspections and tests shall be performed on process equipment. | Y | According to the MI tab in the RMP binder, a monthly work order (WO) is generated by the Maintenance Coordinator and distributed among the assigned operators/ technicians. As they are completed, the assigned technician verifies the WO is completed, logs in, and closes out the WO in the system. Completed maintenance records are filed electronically in the current maintenance system. As part of the preventative maintenance (PM) Plan of the Ammonia Injection System, the facility operators conduct daily inspections. These are maintained in the office for a year. After a year, records are maintained in the Archive Room. | |
| | | Inspection and testing procedures shall follow recognized and generally accepted good engineering practices (RAGAGEP). | Y | | |
| | | The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience. | Y | | |
| | | The owner, operator, or employer shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test. | Y | Ammonia related tasks within the log have been highlighted in the document for easy track. Chemical holding tanks are inspected at least quarterly by the chemical provider, AirGas. Inspection reports include date of the inspection / test, name of the inspector, equipment identification, the inspection items analyzed, and results of the inspection/test. More details on Mechanical Integrity Inspections are included in Section 4.0 of this section. Inspection records are maintained in the company's maintenance program and | |

| MECHANICAL INTEGRITY (MI) | | | | | |
|---------------------------|--|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | | | certificates with the responsible department supervisor. As part of this audit, a list of open work orders was provided to demonstrate ongoing scheduled maintenance/inspection tasks | |
| MI-05 | EPA 40CFR 68.73 (e) OSHA 29CFR 1910.119 (j)(5) CalOSHA 8CCR 5189 (j)(3) CalARP 19CCR 2760.5 (e) | Equipment deficiencies: | | | |
| | | The owner, operator, or employer shall correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information) before further use or in a safe and timely manner when necessary means are taken to assure safe operation. | Y | Procedures for the Management of Change (AI-05) document how the facility addresses equipment deficiencies in a safe and timely manner. | |
| MI-06 | EPA 40CFR 68.73 (f) OSHA 29CFR 1910.119 (j)(6) CalOSHA 8CCR 5189 (j)(4) CalARP 19CCR 2760.5 (f) | Quality assurance: | | | |
| | | In the construction of new plants and equipment, the owner or operator shall assure that equipment as it is fabricated is suitable for the process application for which they will be used. | Y | The facility was constructed 1990-1991. A summary of equipment replacement is located in Section 5.0, of the MI tab. If necessary and prior to placing new or modified equipment into service, a Pre-Startup Safety Review (PSSR) will be performed in accordance with the facility's PSSR procedure. | |
| | | Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions. | Y | Maintenance spare parts are purchased per equipment specifications, vendor parts lists, or previous purchase order. | |
| | | The owner, operator or employer shall assure that maintenance materials, spare parts and equipment are suitable for the process application for which they will be used. | Y | Any changes in equipment or materials of construction that may become necessary go through the facility's MOC procedure. | |

| MANAGEMENT OF CHANGE (MOC) | | | | | |
|----------------------------|--|---|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| MOC-01 | EPA 40CFR 68.75 (a) OSHA 29CFR 1910.119 (I)(1) CalOSHA 8CCR 5189 (I)(1) CalARP 19CCR 2760.6 (a) | The owner, operator, employer shall establish and implement written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, equipment, and procedures; and, changes to stationary sources that affect a covered process. | Y | The RMP binder contains a written MOC Procedure that addresses process chemical, technology, equipment, procedures, and changes to the facility that affect the chemical storage processes is in-place. The written MOC procedure is AI-05, “Management of Change” revised 7/3/2019 by KPC. This Administrative Instruction provides a systematic approach for initiating, authorizing, and implementing modifications to the facility systems and operational processes. | |
| MOC-02 | EPA 40CFR 68.75 (b) OSHA 29CFR 1910.119 (I)(2) CalOSHA 8CCR 5189 (I)(2) CalARP 19CCR 2760.6 (b) | The procedures shall assure that the following considerations are addressed prior to any change: | | | |
| | | The technical basis for the proposed change; | Y | The MOC form used by the facility is located in Appendix A of AI-05 and includes: <ul style="list-style-type: none"> Technical information basis for the proposed change; Impact of change on safety and health; Modifications to operating procedures; Necessary time period for the change; and, Authorization requirements for the proposed change. | |
| | | Impact of change on safety and health; | Y | | |
| | | Modifications to operating procedures; | Y | | |
| | | CalARP: Modifications to and/or development of new operating and maintenance procedures; | | | |
| | | Necessary time period for the change; and, | Y | | |
| | | Authorization requirements for the proposed change. | Y | The Safety Supervisor or his designee is responsible for organizing and monitoring the status of MOCs and will complete the MOC record for the project close-out. Completed MOC forms are located in the Control Room. At the time of this report, the Safety Supervisor role was vacant so the Plant Manager had responsibility for MOC procedures. However, | |

| MANAGEMENT OF CHANGE (MOC) | | | | | |
|----------------------------|--|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | | | since there had been no changes at the facility, no MOC forms were available for review. | |
| MOC-03 | EPA 40CFR 68.75 (c) OSHA 29CFR 1910.119 (I)(3) CalOSHA 8CCR 5189 (I)(3) CalARP 19CCR 2760.6 (c) | Employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process shall be informed of, and trained in, the change prior to start-up of the process or affected part of the process. | Y | The MOC Procedure/Forms complies with the requirement and includes sections to ensure training is completed. A PSSR form is in place and it is part of the MOC documentation. AI-05, "Management of Change (MOC)" includes provisions to inform employees of changes, whose job tasks are working around the covered process. | |
| MOC-04 | EPA 40CFR 68.75 (d) OSHA 29CFR 1910.119 (I)(4) CalOSHA 8CCR 5189 (I)(4) CalARP 19CCR 2760.6 (d) | If a change covered by this paragraph (Management of Change requirements) results in a change in the process safety information, such information shall be updated accordingly. | Y | The RMP binder states any documentation update requirements are determined and tracked per MOC procedure and it includes the PSI. Since there had been no changes at the facility, no MOC forms were available for review and no documentation upgrade to check. This item could not be verified by this audit, but the procedure is in place. | |
| MOC-05 | EPA 40CFR 68.75 (e) OSHA 29CFR 1910.119 (I)(5) CalOSHA 8CCR 5189 (I)(5) CalARP 19CCR 2760.6 (e) | If a change covered by this paragraph (Management of Change requirements) results in a change in the operating procedures, such procedures or practices shall be updated accordingly. CalARP: If a change covered by this section results in a change in the operating procedures or practices required by Section 2760.3 (operating procedures), and/or results in a change in the written procedures to maintain the | Y | The RMP binder states any documentation update requirements are determined and tracked per MOC procedure and it includes the PSI. Since there had been no changes at the facility, no MOC forms were available for review and no documentation upgrade to check. This item could not be verified by this audit, but the procedure is in place. | |

| MANAGEMENT OF CHANGE (MOC) | | | | | |
|----------------------------|-----------------------|---|-----------------|----------|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | ongoing integrity of process equipment required by Section 2760.5 (mechanical integrity), such procedures or practices shall be updated prior to start-up of the process. | | | |

| PRE-STARTUP SAFETY REVIEW (PSSR) | | | | | |
|----------------------------------|--|--|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| PSSR-01 | EPA 40CFR 68.77 (a) OSHA 29CFR 1910.119 (i)(1) CalOSHA 8CCR 5189 (i)(1) CalARP 19CCR 2760.7 (a) | The owner, operator, or employer shall perform a pre-startup safety review for new facilities and for modified facilities when the modification is significant enough to require a change in the process safety information. | Y | The PSSR procedure is located in Attachment A behind the PSSR tab of the RMP binder and is part of the MOC procedure. | |
| PSSR-02 | EPA 40CFR 68.77 (b) OSHA 29CFR 1910.119 (i)(2) CalOSHA 8CCR 5189 (i)(2) CalARP 19CCR 2760.7 (b) | The pre-startup safety review shall confirm that prior to the introduction of regulated substances to a process: CalARP: The pre-startup safety review shall confirm, as a verification check, independent of the management of change process, that prior to the introduction of regulated substances to a process: | | | |
| | | Construction and equipment is in accordance with design specifications; | Y | The Safety Supervisor or his designee is responsible for organizing and monitoring status of the PSSR's as well as completing MOC's. | |
| | | Safety, operating, maintenance, and emergency procedures are in place and are adequate; | Y | This will also include the PSSR forms. At the time of this report, the Safety Supervisor role is vacant, so the Plant Manager has acting responsibility for PSSR procedures. | |
| | | For new stationary sources, a process hazard analysis has been performed and recommendations have been resolved or implemented before startup; and modified stationary sources meet the requirements contained in management of change, OSHA 29CFR 1910.119 (i) and EPA 40 CFR §68.75. | Y | There were not changes at the facility that would trigger the need for a PSSR, so there were no completed forms available for this audit. Completed forms would be located in the Safety Supervisor's office and include the following. | |
| | | Training of each employee involved in operating a process has been completed. | Y | <ul style="list-style-type: none"> If construction and equipment is in accordance with design specifications. If safety, operating, maintenance, and emergency procedure are in place and adequate. | |

| PRE-STARTUP SAFETY REVIEW (PSSR) | | | | | |
|----------------------------------|--------------------------|---|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | | | <ul style="list-style-type: none">• If a PHA has been performed and recommendation have been resolved or implemented before startup.• If training of each employee involved in operating a process has been completed. | |
| PSSR-03 | CalOSHA 8CCR 5189 (i)(3) | The pre- startup safety review shall involve employees with expertise in process operations and engineering. The employees will be selected based upon their experience and understanding of the process systems being evaluated. | Y | The PSSR form included in Attachment A of the PSSR tab requires a representative from Operations/Maintenance to sign off before startup. This report assumes that individual would be knowledgeable in the process. | |

| COMPLIANCE AUDITS (CA) | | | | | |
|------------------------|--|---|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| CA-01 | EPA 40CFR 68.79 (a) OSHA 29CFR 1910.119 (o)(1) CalARP 19CCR 2760.8 (a) | The owner, operator, or employer shall certify that they have evaluated compliance with the provisions of this section at least every three years to verify that procedures and practices developed under this subpart are adequate and are being followed. | Y | The facility conducted its last audit internally on October 8, 2018. The current audit is meant to meet the triennial requirement for evaluation. The onsite portion was completed on December 9, 2021. | |
| CA-02 | EPA 40CFR 68.79 (b) OSHA 29CFR 1910.119 (o)(2) CalARP 19CCR 2760.8 (b) | The compliance audit shall be conducted by at least one person knowledgeable in the process. | Y | The current audit included Kevin Lawrence, Plant Manager, and Louie Lopez, Supervisor, who were knowledgeable in the process. This report was developed separately from the 2018 report and states how regulatory requirements were met. | |
| CA-03 | EPA 40CFR 68.79 (c) OSHA 29CFR 1910.119 (o)(3) CalARP 19CCR 2760.8 (c) | A report of the findings of the audit shall be developed. CalARP: A report of the scope, methods used, results and findings of the audit shall be developed. This report, including results, shall be available for AA review. | Y | A report will be developed to include the findings of the audit, date of the compliance audit, names of person(s) participating in the compliance audit, and date of the report; The report will include a written summary of the scope of the compliance audit, the techniques and methods used in conducting the compliance audit; and documentation that deficiencies have been corrected or a schedule for implementation of corrective actions | |
| CA-04 | EPA 40CFR 68.79 (d) OSHA 29CFR 1910.119 (o)(4) CalARP 19CCR 2760.8 (d) | The owner, operator, employer shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected. CalARP: The owner or operator shall enter into an agreement with the AA on a | Y | All corrective actions have been recorded in the RMP binder maintained on-site. Previous copies of the RMP binder are kept electronically for reference. | |

| COMPLIANCE AUDITS (CA) | | | | | |
|------------------------|--|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | timetable for resolution of these findings. Otherwise these responses shall be completed one and one half (1.5) years after performing the compliance audit, or the next planned turnaround for items requiring a turnaround. These timelines shall not apply to any compliance audit completed prior to January 1, 2015. The owner or operator shall document the actual completion dates when deficiencies were corrected. | | | |
| CA-05 | EPA 40CFR 68.79 (e) OSHA 29CFR 1910.119 (o)(5) CalARP 19CCR 2760.8 (e) | The owner, operator, or employer shall retain the two (2) most recent compliance audit reports. | Y | The Safety Supervisor maintains the two most recent audit reports and response sheets. At the time of this report, the Safety Supervisor role is vacant. This responsibility falls to the Plant Manager until a new Safety Supervisor is hired. | |

| INCIDENT INVESTIGATION (II) | | | | | |
|-----------------------------|--|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| II-01 | EPA 40CFR 68.81 (a) OSHA 29CFR 1910.119 (m)(1) CalOSHA 8CCR 5189 (m)(1) CalARP 19CCR 2760.9 (a) | The owner, operator, or employer shall investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release of a highly hazardous chemical in the workplace. | Y | The II procedures are located in Section VII of the IIPP. | |
| II-02 | EPA 40CFR 68.81 (b) OSHA 29CFR 1910.119 (m)(2) CalOSHA 8CCR 5189 (m)(2) CalARP 19CCR 2760.9 (b) | An incident investigation shall be initiated as promptly as possible, but not later than 48 hours following the incident. | Y | The II procedure states an incident or potential catastrophic event investigation shall be initiated as promptly as possible, but not later than 48 hours following the incident | |
| II-03 | EPA 40CFR 68.81 (c) OSHA 29CFR 1910.119 (m)(3) CalOSHA 8CCR 5189 (m)(3) CalARP 19CCR 2760.9 (c) | An incident investigation team shall be established and consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident. | Y | The II procedure states for any incident investigation, the investigation team shall be established and consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident | |
| II-04 | EPA 40CFR 68.81 (d) OSHA 29CFR 1910.119 (m)(4) | A report shall be prepared at the conclusion of the investigation which includes at a minimum: | | | |
| | | Date of incident; | Y | The II template report includes required fields for the listed elements. The Safety Supervisor is responsible for closing recommendations | |
| | | Date investigation began; | Y | | |

| INCIDENT INVESTIGATION (II) | | | | | |
|-----------------------------|--|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | CalOSHA 8CCR 5189 (m)(4) | A description of the incident; | Y | tracked through the Intelix incident reporting and corrective actions process. As the time of this report, the role of Safety Supervisor is vacant. As such, the responsibility falls to the Plant Manager. Supervisors and managers are trained and familiar with accident/incident investigation techniques. | |
| | CalARP 19CCR 2760.9 (d) | The factors that contributed to the incident; and, | Y | | |
| | | Any recommendations resulting from the investigation. | Y | | |
| II-05 | EPA 40CFR 68.81 (e) OSHA 29CFR 1910.119 (m)(5) CalOSHA 8CCR 5189 (m)(6) CalARP 19CCR 2760.9 (e) | The owner, operator, or employer shall establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented. CalARP: The owner or operator shall enter into an agreement with the AA on a timetable for resolution of these findings and recommendations. Otherwise these resolutions shall be completed no later than one and one half (1.5) years after the completion of the incident investigation, or two (2) years after the date of the incident, whichever is the earlier of the two dates, or the next planned turnaround for those items requiring turnaround. Resolutions and corrective actions with actual completion dates shall be documented. | Y | As stated in the PSSR tab of the RMP binder, all incident or potential catastrophic event report findings and recommendations shall be promptly addressed, and corrective actions shall be documented | |
| II-06 | EPA 40CFR 68.81 (f) | The report shall be reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable. | Y | The II procedure requires all affected personnel whose job tasks are relevant to the incident finding shall have an opportunity to review the II report. | |

| INCIDENT INVESTIGATION (II) | | | | | |
|-----------------------------|--|--|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | OSHA 29CFR 1910.119 (m)(6) CalOSHA 8CCR 5189 (m)(5) CalARP 19CCR 2760.9 (f) | | | | |
| II-07 | EPA 40CFR 68.81 (g) OSHA 29CFR 1910.119 (m)(7) CalOSHA 8CCR 5189 (m)(7) CalARP 19CCR 2760.9 (g) | Incident investigation reports shall be retained for five years. | Y | The procedure for II reports is to maintain them for at least five years. Implementation could not be verified at the time of this report because there have been no incidents to investigate. | |
| II-08 | NA | Incidents are “tracked” in a way that will allow “trends” to be identified that may lead to prevention/risk reduction. This is a beneficial activity for facilities that practice similar “optional” activities. | Y | Based on onsite interviews, records are kept and reviewed to identify trends over time. Although this is a standard practice, there have been no incidence within the last five (5) years so implementation could not be verified. | |

| EMPLOYEE PARTICIPATION (EP) | | | | | |
|-----------------------------|---|---|-----------------|---|---|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| EP-01 | EPA 40CFR 68.83 (a) OSHA 29CFR 1910.119 (c)(1) CalOSHA 8CCR 5189 (p) CalARP 19CCR 2760.10 (a) | The owner, operator, or employer shall develop a written plan of action regarding the implementation of the employee participation required by this paragraph. | Y | The EP procedures are located in Section IV of the IIPP. Employees are encouraged to participate in promoting the safe operation of the plant whenever possible. The IIPP is located in the Safety Supervisor's office. At the time of this report, the role of the Safety Supervisor was vacant. The responsibility for maintaining the IIPP and EP procedures falls to the Plant Manager | |
| EP-02 | EPA 40CFR 68.83 (b) OSHA 29CFR 1910.119 (c)(2) CalOSHA 8CCR 5189 (p)(1) CalARP 19CCR 2760.10 (b) | The owner, operator, or employer shall consult with employees and their representatives on the conduct and development of process hazard analyses and on the development of the other elements of process safety management in this standard. | Y | | |
| EP-03 | EPA 40CFR 68.83 (c) OSHA 29CFR 1910.119 (c)(3) CalOSHA 8CCR 5189 (p)(2) CalARP 19CCR 2760.10 (c) | The owner, operator, or employer shall provide to employees and their representatives access to process hazard analyses and to all other information required to be developed under this standard. | P | The Safety Supervisor is responsible for making RMP\PSM information accessible to all employees. A request for information can be made verbally or in writing to any supervisor. All employees shall be provided time and an area for access. Kevin Lawrence confirmed, during an onsite interview, that all staff have full access to the information on the server and upon request. | 2021.DVP.CA.009: Provide general awareness training on the content and intent of the RMP plan. |

| HOT WORK PERMIT (HWP) | | | | | |
|-----------------------|--|--|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| HWP-01 | EPA 40CFR 68.85 (a) OSHA 29CFR 1910.119 (k)(1) CalOSHA 8CCR 5189 (k)(1) CalARP 19CCR 2760.11 (a) | The owner, operator, or employer shall issue a hot work permit for hot work operations conducted on or near a covered process. | Y | According to the HWP tab, Lock-Out/Tag-Out (LOTO) procedures are established in SM-XII, "Lockout and Tagout Procedures," revised February 6, 2015 by Kit Blessing. Other hot work procedures are outlined in SI-14. | |
| HWP-02 | EPA 40CFR 68.85 (b) OSHA 29CFR 1910.119 (k)(2) Cal OSHA 8CCR 5189 (k)(2) CalARP 19CCR 2760.11 (b) | The permit shall document that the fire prevention and protection requirements in 29 CFR 1910.252(a) and Section 5189 of Title 8 of CCR have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed. The permit shall be kept on file until completion of the hot work operations. | Y | <p>SI-14 documents the fire prevention and protection requirements in 29 CFR §1910.252(a). The "Lockout/Tagout Record Sheet" includes the date of the for the hot work and the equipment on which the work will be performed (or the work to be performed).</p> <p>According to the HWP Tab, The Hot Work Permit log sheet will be completed when a permit is closed and the closed permit is then relocated to the closed section of the Hot Work Permit Book. The Shift Supervisors are responsible for periodically removing the closed permits from the binder and filing them appropriately.</p> <p>Completed permits are kept in the Safety Supervisor's office for twelve (12) months before they are discarded. At the time of this audit, the Safety Supervisor role was vacant. In the absence of a Safety Supervisor, the Plant Manager assumes responsibility.</p> | |

| CONTRACTORS (CON) | | | | | |
|-------------------|---|---|-----------------|---|--|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| CON-01 | EPA 40CFR 68.87 (a) OSHA 29CFR 1910.119 (h)(1) Cal OSHA 8CCR 5189 (h) CalARP 19CCR 2760.12 (a) | <u>Application.</u> This section applies to contractors performing maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. It does not apply to contractors providing incidental services which do not influence process safety, such as janitorial work, food and drink services, laundry, delivery or other supply services. | | | |
| CON-02 | EPA 40CFR 68.87 (b) OSHA 29CFR 1910.119 (h)(2) Cal OSHA 8CCR 5189 (h) CalARP 19CCR 2760.12 (b) | Employer responsibilities: | | | |
| | | The owner, operator, or employer, when selecting a contractor, shall obtain and evaluate information regarding the contract owner or operator's safety performance and programs. | Y | The facility has a contractor program which begins with the initial screening of contractors. Responsibilities are assigned to oversee each aspect of contractor management. The main points of the contractor management program are summarized below. <ul style="list-style-type: none"> Obtain and evaluate information regarding prospective contractor's safety performance and programs. After a contractor has been selected to perform work on or near the covered process, the facility provides information about the site and obtain certain information from the contractor. Contractor employees sign in and sign out each day. The exception to this is when an outage at the facility occurs, and the contractor's supervisor is responsible for tracking personnel presence on-site. | 2021.DVP.CA.010: Consider developing a mechanism to ensure contractor safety is maintained when normal operations is disrupted (i.e. construction) temporarily. |
| | | The owner, operator, or employer shall inform contract employers of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process. | Y | | |
| | | The owner, operator, or employer shall explain to the contract employers the applicable provisions of emergency action plan required by Section OSHA 29 CFR 1910.119 (n). | Y | | |
| | | CalARP: The owner or operator shall explain to the contract owner or operator the applicable provisions of Article 7, Emergency Response Program. | Y | | |

| CONTRACTORS (CON) | | | | | |
|-------------------|-----------------------|---|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | <p>The owner, operator, or employer shall develop and implement safe work practices consistent with OSHA 29 CFR 1910.119 (f)(4), to control the entrance, presence, and exit of the contract owner or operator and contract employees in covered process areas.</p> <p>EPA RMP, §68.69(d): <i>The owner or operator shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; Confined space entry; Opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees.</i></p> | Y | <ul style="list-style-type: none"> Documentation is maintained of orientations, evaluations, and other pertinent information. <p>The Safety Supervisor should perform random interviews of contract employees to verify that they have received the required training and information.</p> <p>It should be noted that, as part of this audit, a representative of RMP was sent to the facility. Upon arrival, there was a lack of contractor screening, as described in the contractor program. However, the facility was undergoing construction and the check-in station was not in service. Additionally, the representative is a safety professional and was onsite for the sole purpose of ensuring Hazardous Materials safety, so it may be assumed they were aware of onsite hazards.</p> | |
| | | <p>The owner, operator, or employer shall periodically evaluate the performance of the contract owner or operator in fulfilling their obligations as specified in paragraph OSHA 29 CFR 1910.119 (h)(3).</p> <p>CalARP: <i>The owner or operator shall periodically evaluate and document the evaluation of the performance of the contract owner or operator in fulfilling their obligations as specified in Section (c), "Contract owner or operator responsibilities".</i></p> | Y | <p>The Safety Supervisor performs random interviews of contract employees to verify that they have received the required training and information.</p> <p>At the time of this report, the Safety Supervisor role is vacant. Until the position is filled, the responsibility for this section falls to the Plant Manager.</p> | |

| CONTRACTORS (CON) | | | | | |
|-------------------|---|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| CON-03 | OSHA 29CFR 1910.119 (h)(2) CalOSHA 8CCR 5189 (h)(7) | The owner, operator, or employer shall maintain a contract employee injury and illness log related to the contractor's work in process areas. | Y | All injury and illness records for contractors are prepared and maintained by the Safety Supervisor, who also maintains all contractor forms as part of the contractor management file | |
| CON-04 | EPA 40CFR 68.87 (c) OSHA 29CFR 1910.119 (h)(3) CalOSHA 8CCR 5189 (h)(1) CalARP 19CCR 2760.12 (c) | Contract employer responsibilities: | | | |
| | | The contract employer shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job. | Y | According to the Contractor Tab in the RMP binder the Safety Supervisor or designee conducts periodic inspections of the contractor work areas. These inspections are unscheduled and may include a review of a variety of activities. The Safety Supervisor may review pre-job briefings, toolboxes, certificates/licenses, and inspect PPE, tools, and equipment. Employees may be asked to verify safe work practices of the contractor employees. | |
| | | The contract employer shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan. | Y | | |
| | | The contract employer shall document that each contract employee has received and understood the training required by this section. The contract employer shall prepare a record which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training. | Y | The results of the evaluation and any follow up actions must also be documented. Follow up actions involving corrective actions of work performed must include notification to the contractor employer. All injury and illness records for contractors are prepared and maintained by the Safety Supervisor, who also maintains all contractor forms as part of the contractor management file. | |
| | | The contract employer shall assure that each contract employee follows the safety rules of the stationary source including the safe work practices required by OSHA 29 CFR 1910.119 (f)(4). | Y | | |
| | | The contract employer shall advise the employer of any unique hazards | Y | | |

| CONTRACTORS (CON) | | | | | |
|-------------------|-----------------------|---|-----------------|----------|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | presented by the contract owner or operator's work, or of any hazards found by the contract owner or operator's work. | | | |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|--|--|--------------------|---|-----------------|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| EP&R-01 | OSHA 29CFR 1910.119 (n) CalOSHA 8CCR 5189 (n) | Emergency Response Applicability: | Y | The facility maintains an emergency action plan which is outlined in the following documents. <ul style="list-style-type: none"> SI-10A Emergence Action Plan SI-10B EAP/Ammonia Leak SI-10C EAP/Acid Spill SI-10D Training | |
| | | The owner, operator, or employer shall establish and implement an emergency action plan for the entire plant in accordance with the provisions of 29 CFR 1910.38. In addition, the emergency action plan shall include procedures for handling small releases. Employers covered under this standard may also be subject to the hazardous waste and emergency response provisions contained in 29 CFR 1910.120 (a), (p) and (q). CalOSHA: The employer shall establish an Emergency Action Plan in accordance with the provisions of Section 3220. | | | |
| EP&R-02 | EPA 40CFR 68.90 CalARP 19CCR 2765.1 | (a) Except as provided in Section (b), the owner, operator, or employer of a stationary source with Program 2 and Program 3 processes shall comply with the requirements of Section 2765.2. (b) The owner, operator, or employer of a stationary source whose employees will not respond to accidental releases of regulated substances need not comply with Section 2765.2 provided that they meet the following: A) For stationary sources with any regulated toxic substance held in a process above the threshold quantity, the stationary source is included in the community | Y | Desert View Power, Inc. is nonresponding facility and personnel are trained to evacuate the area and notify personnel of the emergency. | |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|-----------------------|---|--------------------|--|-----------------|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| | | <p>emergency response plan developed under Section 11003 of Title 42 of the United States Code (USC);</p> <p>B) For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the owner or operator has coordinated response actions with the local fire department; and,</p> <p>C) Appropriate mechanisms are in place to notify emergency responders when there is a need for a response.</p> <p>EPA RMP:</p> <p>D) The owner or operator performs the annual emergency response coordination activities required under §68.93; and</p> <p>E) The owner or operator performs the annual notification exercises required under §68.96(a).</p> | | | |
| EP&R-03 | EPA 40CFR 68.93 | The owner or operator of a stationary source shall coordinate response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance. | | | |
| | | Coordination shall occur at least annually, and more frequently if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; | Y | According to the Emergency Preparedness and Response (EP&R) tab of the RMP binder, the facility maintains an open dialogue with Fire Station 40 in Mecca, California. The Safety Supervisor is responsible for ensuring good | |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|-----------------------|--|--------------------|---|--|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| | | and/or in the community emergency response plan. | | communications with local authorities. At the time of this report, the Safety Supervisor role is vacant and the responsibility falls to the Plant Manager until a replacement is hired. | |
| | | Coordination shall include providing to the local emergency planning and response organizations: The stationary source's emergency response plan if one exists; emergency action plan; updated emergency contact information; and other information necessary for developing and implementing the local emergency response plan. For responding stationary sources, coordination shall also include consulting with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under §68.96(b). The owner or operator shall request an opportunity to meet with the local emergency planning committee (or equivalent) and/or local fire department as appropriate to review and discuss those materials. | N | The facility has not provided copies of the Emergency Action Plan (EAP) to local authorities at this time but has coordinated efforts for response. | 2021.DVP.CA.011: Provide copies of the EAP to local authorities. |
| | | The owner or operator shall document coordination with local authorities, include: The names of individuals involved and their contact information (phone number, email address, and organizational affiliations); dates of coordination activities, and nature of coordination activities. | P | SI-10 contains contact information for those individuals and agencies with which the facility coordinates emergency response. However, there are no records of ongoing coordination. | 2021.DVP.CA.012: Consider developing a mechanism to document ongoing coordination efforts with local response agencies. |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|--|---|--------------------|---|-----------------|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| EP&R-04 | EPA 40CFR 68.95 (a) CalARP 19CCR 2765.2 (a) | Emergency Response Program: The owner or operator shall develop and implement an emergency response program for the purpose of protecting public health and the environment. The emergency response program shall include the following: | | | |
| | | An emergency response plan, which shall be maintained at the stationary source and contain at least the following elements: | Y | See comments below. | |
| | | A) Procedures for informing and interfacing with the public and local emergency response agencies about accidental releases, emergency planning, and emergency responses; | Y | SI-10 contains contact information for those individuals and agencies with which the facility coordinates emergency response. | |
| | | B) Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures; and | Y | SB-10D states personnel are trained in First-Aid and CPR. The GPI Learn Training records provided by the facility indicate First-Aid Training is happening at regular intervals. | |
| | | C) Procedures and measures for emergency response after an accidental release of a regulated substance. | Y | SI-10A, SI-10B, and SI-10C include procedure for measures directly following an emergency. | |
| | | Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance | NA | The facility has an EAP and does not have emergency response equipment to maintain onsite. | |
| | | Training for all employees in relevant procedures and relevant aspects of the Incident Command System. | NA | The EP&R section lays out a chain of command during an emergency but, as they are not responders, do not provide training on the use of the Incident Command Systems as described by the National Incident Management System. | |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|---|---|--------------------|---|-----------------|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| | | <p>Procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that the employees are informed of changes.</p> <p>EPA RMP: The owner or operator shall review and update the plan as appropriate based on changes that the stationary source or new information obtained from coordination activities, emergency response exercises, indicant investigations, or other available information, and ensure that employees are informed of the changes.</p> | Y | As stated in the IIPP, the Safety Committee, led by the Safety Supervisor, review the safety procedures on a regular basis. In addition, the IIPP states the RMP/PSM program, which included the EAP, is reviewed annually. | |
| EP&R-05 | <p>EPA 40CFR 68.95 (b)</p> <p>CalARP 19CCR 2765.2 (b)</p> | The program shall include a written plan that complies with other Federal contingency plan regulations or is consistent with the approach in the National Response Team's Integrated Contingency Plan Guidance ("One Plan") and that, among other matters, includes the elements provided in paragraph (a) of this section, shall satisfy the requirements of this section if the owner or operator also complies with paragraph (c) of this section. | NA | The facility has an EAP and meets the requirements as specified above. | |
| EP&R-06 | <p>EPA 40CFR 68.95 (c)</p> <p>CalARP 19CCR 2765.2 (c)</p> | The emergency response plan developed under EP&R-03 shall be coordinated with the community emergency response plan developed under USC Title 42 Section 11003. Upon request of the local emergency planning committee or emergency response officials, the owner or | NA | The facility has an EAP and meets the requirements as specified above. | |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|-----------------------|--|--------------------|--|-----------------|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| | | operator shall promptly provide to the local emergency response officials information necessary for developing and implementing the community emergency response plan. | | | |
| EP&R-07 | EPA 40CFR 68.96 (a) | Notification exercises. At least once each calendar year, the owner or operator of a stationary source with any Program 2 or Program 3 process shall conduct an exercise of the stationary source's emergency response notification mechanisms required under §68.90(b)(3) or §68.95(a)(1)(i), as appropriate, before December 19, 2024 , and annual thereafter. Owners or operators of responding stationary sources may perform the notification exercise as part of the tabletop and field exercises required in paragraph (b) of this section. The owner/operator shall maintain a written record of each notification exercise conducted over the last five years. | NA | This requirement is not yet required, but the facility has been informed of the requirement for annual notification exercises before December 19, 2024 | |
| EP&R-08 | EPA 40CFR 68.96 (b) | Emergency response exercise program. The owner or operator of a stationary source subject to the requirements of §68.95 shall develop and implement an exercise program for its emergency response program, including the plan required under §68.95(a)(1). Exercises shall involve facility emergency response personnel and, as appropriate, emergency response contractors. When planning emergency response field and tabletop exercises, the owner or operator shall coordinate with local public emergency response officials and invite them to participate in the exercise. The emergency response exercise program shall include: | | | |
| | | (1) Emergency response field exercises. The owner or operator shall conduct field exercises involving the simulated accidental release of a regulated substance (i.e., toxic substance release or release of a regulated flammable substance involving a fire | NA | The facility has an EAP and meets the requirements as specified above. | |

EMERGENCY PLANNING AND RESPONSE (EP&R)

| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
|-----|-----------------------|---|--------------------|----------|-----------------|
| | | <p>and/or explosion).</p> <p>i. Frequency. As part of coordination with local emergency response officials required by §68.93, the owner or operator shall consult with these officials to establish an appropriate frequency for field exercises.</p> <p>ii. Scope. Field exercises shall involve tests of the source's emergency response plan, including deployment of emergency response personnel and equipment. Field exercises should include: Tests of procedures to notify the public and the appropriate Federal, state, and local emergency response agencies about an accidental release; tests of procedures and measures for emergency response actions including evacuations and medical treatment; tests of communications systems; mobilization of facility emergency response personnel, including contractors, as appropriate; coordination with local emergency responders;</p> | | | |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|-----------------------|--|--------------------|---|-----------------|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| | | emergency response equipment deployment; and any other action identified in the emergency response program, as appropriate. | | | |
| | | <p>(2) Tabletop exercises: The owner or operator shall conduct a tabletop exercise involving the simulated accidental release of a regulated substance.</p> <p>i. Frequency. As part of coordination with local emergency response officials required by §68.93, the owner or operator shall consult with these officials to establish an appropriate frequency for tabletop exercises, and shall conduct a tabletop exercise before December 21, 2026, and at a minimum of at least once every three years thereafter.</p> <p>ii. Scope. Tabletop exercises shall involve discussions of the source's emergency response plan. The exercise should include discussions of: Procedures to notify the public and the appropriate Federal, state, and local emergency response agencies; procedures and</p> | NA | This requirement is not yet applicable. However, the requirement for coordination with local authorities and to hold a tabletop exercise before December 21, 2026 has been communicated with the facility | |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|-----------------------|---|--------------------|--|-----------------|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| | | measures for emergency response including evacuations and medical treatment; identification of facility emergency response personnel and/or contractors and their responsibilities; coordination with local emergency responders; procedures for emergency response equipment deployment; and any other action identified in the emergency response plan, as appropriate. | | | |
| | | (3) Documentation. The owner or operator shall prepare an evaluation report within 90 days of each field and tabletop exercise. The report should include: A description of the exercise scenario; names and organizations of each participant; and evaluation of the exercise results including lessons learned; recommendations for improvement or revisions to the emergency response exercise program and emergency response program, and a schedule to promptly address and resolve recommendations. | NA | The facility has an EAP and meets the requirements as specified above. | |
| EP&R-09 | EPA 40CFR 68.96 (c) | Alternative means of meeting exercise requirements. The owner or operator may satisfy the requirement to conduct notification, field and/or tabletop exercises through: | | | |
| | | (1) Exercises conducted to meet other | NA | The facility has an EAP and meets the | |

| EMERGENCY PLANNING AND RESPONSE (EP&R) | | | | | |
|--|-------------------------|--|--------------------|--|-----------------|
| ID# | Regulatory References | Requirement | Compliant Y/N/P/NA | Findings | Recommendations |
| | | Federal, state or local exercise requirements, provided the exercise meets the requirements of paragraphs (a) and/or (b) of this section, as appropriate. | | requirements as specified above. | |
| | | (2) Response to an accidental release, provided the response includes the actions indicated in paragraphs (a) and/or (b) of this section, as appropriate. When used to meet field and/or tabletop exercise requirements, the owner or operator shall prepare an after-action report comparable to the exercise evaluation report required in paragraph (b)(3) of this section, within 30 days of the incident. | NA | The facility has an EAP and meets the requirements as specified above. | |
| EP&R-10 | CalARP 19CCR 2765.2 (d) | The owner or operator is not required to meet the business plan requirements if the emergency response plan developed under this section is consistent with the business plan requirements pursuant to Sections 2731 and 2732 of Title 19 of CCR. This does not exempt the owner or operator from requirements which relate to the annual inventory or emergency response planning for hazardous materials which are not regulated substances. | NA | The facility has an EAP and meets the requirements as specified above. | |

| INJURY & ILLNESS PREVENTION PROGRAM (IIPP) | | | | | |
|--|-------------------------|--|-----------------|--|---|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| IIPP-01 | Cal/OSHA 8 CCR 5189 (o) | Injury and Illness Prevention Program. The employer's Injury and Illness Prevention Program required by Section 3203 shall include applicable part(s) of this section. | Y | The facility maintains an IIPP. The 2018 revision was included as part of this audit. | |
| IIPP-02 | Cal/OSHA 7 CCR 3203 (a) | Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program (Program). The Program shall be in writing and, shall, at a minimum: | | | |
| | | Identify the person or persons with authority and responsibility for implementing the Program. | Y | The Safety Coordinator is identified as the person responsible for the IIPP. At this time of this report, the Safety Supervisor (Coordinator) role is vacant so the responsibility falls on the Plant Manager until the role is filled. | 2021.DVP.CA.013: Consider updating the Safety Coordinator role to the Safety Supervisor for consistency. |
| | | Include a system for ensuring that employees comply with safe and healthy work practices. Substantial compliance with this provision includes recognition of employees who follow safe and healthful work practices, training and retraining programs, disciplinary actions, or any other such means that ensures employee compliance with safe and healthful work practices. | Y | According to the employee compliance section of the IIPP, all employees are given new orientation training on the IIPP and provided with refresher training annually. Safety Committee members conduct monthly inspections of working conditions (but can also make observations at any time). Findings are discussed with the Committee Members so improvements can be made. | |
| | | Include a system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal. Substantial compliance with this provision includes meetings, training programs, posting, | Y | Section IV of the IIP encourages employees to submit their safety concerns to the Safety Committee during a safety meeting or in writing. Additionally, safety concerns can be submitted through supervisors. In addition, the facility will provide news and reading materials to employees regarding safety concerns to promote awareness. | |

| INJURY & ILLNESS PREVENTION PROGRAM (IIPP) | | | | | |
|--|-----------------------|---|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | <p>written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means that ensures communication with employees.</p> <p>Exception: Employers having fewer than 10 employees shall be permitted to communicate to and instruct employees orally in general safe work practices with specific instructions with respect to hazards unique to the employees' job assignments as compliance with Subsection (a)(3).</p> | | | |
| | | <p>Include procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards:</p> <p>A) When the Program is first established;</p> <p>Exception: Those employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with previously existing Section 3203.</p> <p>B) Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and</p> | Y | <p>Safety Committee members conduct monthly inspections of working conditions (but can also make observations at any time). Findings are discussed with the Committee Members so improvements can be made.</p> | |

| INJURY & ILLNESS PREVENTION PROGRAM (IIPP) | | | | | |
|--|-----------------------|--|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | C) Whenever the employer is made aware of a new or previously unrecognized hazard. | | | |
| | | Include a procedure to investigate occupational injury or occupational illness. | Y | Section VII Investigations of the IIPP includes procedures to conduct investigations occupations injuries or illnesses and includes all the required elements. | |
| | | Include methods and/or procedures for correcting unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard: A) When observed or discovered; and, B) When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards. | Y | The IIPP states that once an unsafe work practice is observed by or reported to the Safety Committee, the Committee will evaluate and implement safety procedures to eliminate/reduce the risk of occupational illness or injury at the facility. | |
| | | Provide training and instruction: A) When the program is first established; Exception: Employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with the previously existing Accident Prevention Program in Section 3203. B) To all new employees; | Y | Section V Training of the IIPP outlines the training procedures and includes all required elements. | |

| INJURY & ILLNESS PREVENTION PROGRAM (IIPP) | | | | | |
|--|------------------------|--|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | C) To all employees given new job assignments for which training has not previously been received; D) Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard; E) Whenever the employer is made aware of a new or previously unrecognized hazard; and, F) For supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed. | | | |
| IIPP-03 | CalOSHA 7 CCR 3203 (b) | Records of the steps taken to implement and maintain the Program shall include: | | | |
| | | Records of scheduled and periodic inspections required by Subsection (a)(4) to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and action taken to correct the identified unsafe conditions and work practices. These records shall be maintained for at least one (1) year; and Exception: Employers with fewer than 10 employees may elect to maintain the inspection records only until the hazard is corrected. | Y | The IIPP indicated that Inspection records shall be maintained in the company's maintenance program and certificates with the responsible department supervisor. | |
| | | Documentation of safety and health training required by Subsection (a)(7) for | Y | The facility has a training procedure in place. GPI Learning records (from GPI Learning Plus, | |

| INJURY & ILLNESS PREVENTION PROGRAM (IIPP) | | | | | |
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| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | <p>each employee, including employee name or other identifier, training dates, type(s) of training, and training providers. This documentation shall be maintained for at least one (1) year.</p> <p>EXCEPTION NO. 1: Employers with fewer than 10 employees can substantially comply with the documentation provision by maintaining a log of instructions provided to the employee with respect to the hazards unique to the employees' job assignment when first hired or assigned new duties.</p> <p>EXCEPTION NO. 2: Training records of employees who have worked for less than one (1) year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.</p> <p>EXCEPTION NO. 3: For Employers with fewer than 20 employees who are in industries that are not on a designated list of high-hazard industries established by the Department of Industrial Relations (Department) and who have a Workers' Compensation Experience Modification Rate of 1.1 or less, and for any employers with fewer than 20 employees who are in industries on a designated list of low-hazard industries established by the</p> | | <p>an inline training platform) were included as part of this audit demonstrated completed online training for multiple topics including confined space awareness, understanding P&IDs, respirator training (basic), Valves/Traps/Piping exam, as well as other topics. In addition, records included a mechanism for tracking employee, training types, and refresher training dates. Documentation provided only included 2021 training dates. Proof of record maintenance beyond that was not included as part of this audit.</p> | |

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| | | <p>Department, written documentation of the Program may be limited to the following requirements:</p> <p>A) Written documentation of the identity of the person or persons with authority and responsibility for implementing the program as required by Subsection (a)(1).</p> <p>B) Written documentation of scheduled periodic inspections to identify unsafe conditions and work practices as required by Subsection (a)(4).</p> <p>C) Written documentation of training and instruction as required by Subsection (a)(7).</p> <p>EXCEPTION NO. 4: Local governmental entities (any county, city, city and county, or district, or any public or quasi-public corporation or public agency therein, including any public entity, other than a state agency, that is a member of, or created by, a joint powers agreement) are not required to keep records concerning the steps taken to implement and maintain the Program.</p> <p>Note 1: Employers determined by the Division to have historically utilized seasonal or intermittent employees shall be deemed in compliance with respect to the requirements for a written Program if the employer adopts the Model Program</p> | | | |

| INJURY & ILLNESS PREVENTION PROGRAM (IIPP) | | | | | |
|--|------------------------|---|-----------------|---|-----------------|
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| | | <p>prepared by the Division and complies with the requirements set forth therein.</p> <p>Note2: Employers in the construction industry who are required to be licensed under Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code may use records relating to employee training provided to the employer in connection with an occupational safety and health training program approved by the Division, and shall only be required to keep records of those steps taken to implement and maintain the program with respect to hazards specific to the employee's job duties.</p> | | | |
| IIPP-04 | CalOSHA 7 CCR 3203 (c) | Employers who elect to use a labor/management safety and health committee to comply with the communication requirements of Subsection (a)(3) of this section shall be presumed to be in substantial compliance with Subsection (a)(3) if the committee: | | | |
| | | Meets regularly, but not less than quarterly; | Y | The Safety Committee meets monthly according to Section II of the IIPP. | |
| | | Prepares and makes available to the affected employees, written records of the safety and health issues discussed at the committee meetings and, maintained for review by the Division upon request. The committee meeting records shall be maintained for at least one (1) year; | Y | <p>According to Section II of the IIPP, minutes from the Safety Committee meetings will be kept and become a part of the safety program records to be maintain by the Safety Supervisor.</p> <p>Based on onsite interviews with Kevin Lawrence and Louie Lopez, all elements of the safety program are available to employees upon request.</p> | |
| | | Reviews results of the periodic, scheduled worksite inspections; | Y | | |

| INJURY & ILLNESS PREVENTION PROGRAM (IIPP) | | | | | |
|--|---|--|-----------------|--|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| | | Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submits suggestions to management for the prevention of future incidents; | Y | It should be noted that at the time if the report, the Safety Supervisor role is vacant. In the absence of designated safety personnel, the responsibility falls to the Plant Manager. According to Section II of the IIPP, the safety committee is responsible for the following. <ul style="list-style-type: none">• Review of accident investigations.• Review of investigation of reported hazardous conditions.• To provide recommendations and assist in the evaluations of employee suggestions.• To verify abatement action taken by the facility to abate citations issues by the Division. | |
| | | Reviews investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions; | Y | | |
| | | Submits recommendations to assist in the evaluation of employee safety suggestions; and | Y | | |
| | | Upon request from the Division, verifies abatement action taken by the employer to abate citations issued by the Division. | Y | | |
| IIPP-05 | 8 elements from CalOSHA 7 CCR 3203 MODEL INJURY AND ILLNESS PREVENTION PROGRAM | Your Injury and Illness Prevention Program must be a written plan that includes procedures and is put into practice. These elements are required: | | | |
| | | Management commitment/assignment of responsibilities; | Y | Section II of the IIPP lists responsibilities and assignments for the Plan. | |
| | | Safety communications system with employees; | Y | Section IV of the IIP provides details on safety communication protocols. | |
| | | System for assuring employee compliance with safe work practices; | Y | | |

| INJURY & ILLNESS PREVENTION PROGRAM (IIPP) | | | | | |
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| | FOR HIGH HAZARD EMPLOYERS | Scheduled inspections/evaluation system; | Y | Section VII includes guidance for inspections aimed at ensuring compliance with safe work practices. | |
| | | Accident investigation; | Y | Section VII of the IIPP outlines procedures for accident investigation. | |
| | | Procedures for correcting unsafe/unhealthy conditions; | Y | Section VII includes the procedures for correcting unsafe conditions through evaluation by the Safety Committee. | |
| | | Safety and health training and instruction; and | Y | Section V outlines the training requirements for all employees; upon hire and as refresher training. | |
| | | Recordkeeping and documentation | Y | According to Section II of the IIPP, minutes from the Safety Committee meetings will be kept and become a part of the safety program records to be maintain by the Safety Supervisor. | |
| IIPP-06 | CalOSHA 8 CCR 5189 (o)(1) | The scheduled and periodic inspections of facilities covered by this section and required by Section 3203(a)(4) shall be conducted by at least one person knowledgeable in the process. | P | The Safety Committee is made up of personnel who are likely knowledgeable in the process, so this requirement is likely being met. However, it is not discussed in the inspection guidelines. | 2021.DVP.CA.014: Consider adding language to ensure inspection are completed by someone knowledgeable in the process. |

| TRADE SECRETS (TS) | | | | | |
|--------------------|-------------------------|---|-----------------|---|-----------------|
| ID# | Regulatory References | Requirement | Answer Y/N/P/NA | Findings | Recommendations |
| TS-01 | OSHA 29CFR 1910.119 (p) | <p>Employers shall make all information necessary to comply with the section available to those persons responsible for compiling the process safety information (required by paragraph (d) of this section), those assisting in the development of the process hazard analysis (required by paragraph (e) of this section), those responsible for developing the operating procedures (required by paragraph (f) of this section), and those involved in incident investigations (required by paragraph (m) of this section), emergency planning and response (paragraph (n) of this section) and compliance audits (paragraph (o) of this section) without regard to possible trade secret status of such information</p> <p>Nothing in this paragraph shall preclude the employer from requiring the persons to whom the information is made available under paragraph (p)(1) of this section to enter into confidentiality agreements not to disclose the information as set forth in 29 CFR 1910.1200.</p> <p>Subject to the rules and procedures set forth in 29 CFR 1910.1200(i)(1) through 1910.1200(i)(12), employees and their designated representatives shall have access to trade secret information contained within the process hazard</p> | Y | The Trade Secrets tab states no documents currently contained in the PSM files contain trade secret information, and no confidentiality agreements (or other forms) need to be filled out when reading or using this information. | |

| TRADE SECRETS (TS) | | | | | |
|--------------------|-----------------------|---|-----------------|----------|-----------------|
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| | | analysis and other documents required to be developed by this standard. | | | |

ATTACHMENT B
COMPLIANCE AUDIT RECOMMENDATIONS

| 2021 COMPLIANCE AUDIT RECOMMENDATIONS | |
|---------------------------------------|--|
| Action ID | Recommendations |
| 2021.DVP.CA.001 | Update the entries assigning RMP responsibilities to Kit Blessing to the new Safety Supervisor. |
| 2021.DVP.CA.002 | Update the estimated impact population in Table 8 of the Hazard Assessment and round to nearest two significant digits. |
| 2021.DVP.CA.003 | Review the PSI information for accuracy and sign the certification statement. |
| 2021.DVP.CA.004 | Ensure the re-designations are made electronically on the master P&ID file. |
| 2021.DVP.CA.005 | Develop a mechanism to ensure PHAs are completed every five (5) years. |
| 2021.DVP.CA.006 | Ensure annual certification of operating procedure review is documented. |
| 2021.DVP.CA.007 | Ensure training records for the ammonia system are maintained and complete. |
| 2021.DVP.CA.008 | Consider including a short description of company policy for hazardous working environmental conditions in the MI section of the MI binder. |
| 2021.DVP.CA.009 | Provide general awareness training on the content and intent of the RMP plan. |
| 2021.DVP.CA.010 | Consider developing a mechanism to ensure contractor safety is maintained when normal operations is disrupted (i.e. construction) temporarily. |
| 2021.DVP.CA.011 | Provide copies of the EAP to local authorities. |
| 2021.DVP.CA.012 | Consider developing a mechanism to document ongoing coordination efforts with local response agencies. |
| 2021.DVP.CA.013 | Consider updating the Safety Coordinator role to the Safety Supervisor for consistency. |
| 2021.DVP.CA.014 | Consider adding language to ensure inspection are completed by someone knowledgeable in the process. |