

# MECHANICAL INTEGRITY

## Revision History

Rev. #	Description of Change	Date	Revised By
0	Initial Issue	July 2016	PSM RMP Solutions

## Purpose

The purpose of this mechanical integrity program is to ensure that the handling and storage of regulated chemicals and associated safety systems are maintained properly. This program is geared towards preventing an accidental release of a chemical and minimizing the consequences if a release does occur. The emphasis of this program is on preventive and predictive maintenance rather than *breakdown* maintenance.

This document summarizes how Inland Star Distribution Centers, Inc. complies with the mechanical integrity requirements for the storage of hazardous chemicals.

## Responsibilities

The General Manager, Operations is responsible for the following activities:

- Ensuring there are written procedures to maintain the equipment and associated safety systems.
- Ensuring the routine maintenance inspections are completed.
- Responding to all employee observations and notifications concerning faulty containers/storage in a timely manner.

## Components of the Mechanical Integrity Plan

### Scope

Inland Star Distribution Centers, Inc. has established this mechanical integrity plan for all equipment and system components that contain a hazardous chemical, plus those key support or utility systems and equipment which are considered critical to the safe storage of hazardous chemicals.

### Training Program

There is no maintenance required for the storage of hazardous chemical storage containers. However, Associates periodically evaluate all areas of the warehouse via walkthroughs noting any package/storage failures. Refer to the Training section of this PSM/CalARP Program for information on the training provided to the Associates.

### Written Inspection Procedures

There are designated Associates for each area within the warehouse. It is the Associate's responsibility to routinely walk their respective area noting any variances in chemical inventory, assess for damage, and inspection of overall cleanliness. In the event a discrepancy is found, immediate action is taken.

### Maintenance and Inspection Tasks

There is no maintenance required on hazardous chemical storage containers, therefore, procedures are not applicable. However, Associates periodically evaluate all areas of the warehouse via walkthroughs noting any package/storage failures. In addition, a "RECEIVED Damage/WHSE Damage" form is completed either initially upon arriving at the facility or while in storage in the event damage is noted. See the facility "Receiving Process" and "Damaged Inventory Process" written policies.

### Procedures for Addressing Equipment Deficiencies

In the event any deficiencies in the storage of hazardous chemicals are identified during system walkthroughs, during scheduled maintenance and inspection tasks, or during a review of the mechanical integrity program should be corrected before further use unless alternate safety measures are implemented before continued operation of the equipment in question.

When a deficiency is discovered, a record describing the deficiency and the measures taken to correct the deficiency is documented on the "RECEIVED Damage/WHSE Damage" form.

### Quality Assurance Program

See the corporate policy "Inventory Control Policy" which is maintained by the Director of EHS<sup>3</sup>.

### Spare Parts – Not Applicable