

MANAGEMENT SYSTEM

Revision History

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

Purpose

This document outlines the management system in place at this facility to oversee the implementation of the PSM/CalARP Program elements. The management system has been developed to assure that the program elements are in place, in use, and effective.

Overall Responsible Person

The General Manager, Operations has overall responsibility for the development, implementation, and integration of the PSM/CalARP Program for this facility. Inland Star Distribution Centers, Inc. has delegated adequate authority, time, and resources to the General Manager, Operations to ensure that the program can be managed appropriately.

Division of Responsibilities

The General Manager, Operations is assisted by other personnel in the development and implementation of the PSM/CalARP Program. Each section within the program is listed in Table 1, along with assignment to appropriate personnel for ensuring implementation and a summary of responsibilities. Attachment A contains the organizational chart which defines the lines of authority among these individuals.

TABLE 1: Assignment of PSM/CalARP Program Implementation

PSM/RMP/CalARP Program Section	Assignment to Personnel	Summary of Responsibilities
Overall Program	General Manager, Operations	<ul style="list-style-type: none"> Overall development, implementation, and integration of the PSM/CalARP Program.
Process Safety Information	General Manager, Operations	<ul style="list-style-type: none"> Maintains current PSI documentation. Ensures PSI documentation is updated prior to implementing a changes to inventory.
Process Hazard Analysis	Director of EHS ³	<ul style="list-style-type: none"> Ensures PHA is revalidated every five years. Reviews and updates the PHA if there is a change to the process. Ensures initial PHA is performed on a new chemical prior to exceeding PSM or CalARP thresholds. Ensures all PHA recommendations are addressed in a timely manner (within 2.5 years of performing the PHA). Retains all PHA reports and resolutions to recommendations for the life of the process.
Operating Procedures	General Manager, Operations	<ul style="list-style-type: none"> Ensures there are written policies/procedures for the handling of hazardous chemicals. Ensures policies/procedures are available to employees performing the procedures. Reviews and updates policies/procedures to reflect actual practices, process changes, etc. Develops new written procedures as needed. Certifies all SOPs on an annual basis.
Training	Director of EHS ³	<ul style="list-style-type: none"> Ensures employees involved in handling hazardous chemicals are trained in the policies/procedures applicable to their duties. Provides refresher training every three years and when there are changes to the policies/procedures. Documents training and retains training records.

PSM/RMP/CalARP Program Section	Assignment to Personnel	Summary of Responsibilities
Contractors	Director of EHS ³ General Manager, Operations Senior Executive Vice President	<ul style="list-style-type: none"> • Obtains and evaluates contractor's safety performance and programs prior to hire. • Obtains training records to assure contract employee has necessary qualifications to perform the requested tasks. • Informs contractor of onsite hazards, emergency notification and evacuation procedures, site entrance and exit procedures, and site safety policies. • Evaluates contractor performance on a periodic basis.
Pre-Startup Safety Review (PSSR) & Management of Change (MOC)	Director of EHS ³ General Manager, Operations	<ul style="list-style-type: none"> • Determines if the planned modification is a change or replacement in kind. • Initiates and oversees the completion of MOC forms. • Ensures applicable PSM and CalARP documentation are updated to reflect changes. • Assures PHA is conducted if needed and recommendations are completed prior to startup of the modified process. • Trains employees on changes and on updated procedures. • Completes the PSSR form prior to startup of the modified process.
Mechanical Integrity	General Manager, Operations	<ul style="list-style-type: none"> • Ensures routine maintenance inspections and testing are performed on process equipment and associated safety systems. • Ensures there are written procedures for maintaining the process equipment and associated safety systems, and they are available to employees and contractors performing the procedures. • Ensures any system deficiencies are dealt with in a timely and sound manner. • Documents all maintenance performed and retains all records. • Performs corrective actions to address any deficiencies.

PSM/RMP/CalARP Program Section	Assignment to Personnel	Summary of Responsibilities
Hot Work Permit	General Manager, Operations	<ul style="list-style-type: none"> • Completes hot work permit prior to performing hot work. • Ensures employees performing hot work and fire watch activities are trained on the hot work permit procedure. • If using a contractor, see Contractors above.
Incident Investigation	Director of EHS ³	<ul style="list-style-type: none"> • Conducts incident investigation on all releases and near misses. • Initiates incident investigation no later than 48 hours following the incident. • Ensures recommendations resulting from the investigation are addressed in a timely manner (within 1.5 years of completing the incident or 2 years after the date of the incident, whichever is earlier). • Reviews incident investigation findings with affected employees and contractors. • Retains incident investigation reports for five years.
Emergency Planning & Response	Director of EHS ³	<ul style="list-style-type: none"> • Ensures there is a site-specific Emergency Action Plan. • Reviews and updates the EAP annually. • Coordinates emergency response activities with responding agency (fire department, hazmat response agency, etc.). • Trains employees on their EAP responsibilities and ensures training is documented. • Conducts annual drills and evaluates the effectiveness of the drill.
Compliance Audits	Director of EHS ³	<ul style="list-style-type: none"> • Ensures compliance audit is performed every three years. • Ensures all audit recommendations are addressed in a timely manner (within 1.5 years of conducting the audit). • Retains the two most recent audit reports, along with the resolutions to the recommendations.

PSM/RMP/CalARP Program Section	Assignment to Personnel	Summary of Responsibilities
Employee Participation	Director of EHS ³ General Manager, Operations	<ul style="list-style-type: none"> • Involves employees in PSM/CalARP-related activities, such as PHA studies, annual review of SOPs, compliance audits, etc. • Provides employees access to the PHA and all other PSM/CalARP documentation. • Ensures all employees are provided with chemical awareness safety training and are made aware of their right to access the PSM/CalARP documentation.
Hazard Assessment <i>(Includes Offsite Consequence Analysis and Five Year Accident History)</i>	Director of EHS ³	<ul style="list-style-type: none"> • Updates the Hazard Assessment every five years. • Reviews and updates the Hazard Assessment if there are process changes that affect the results of the worst case and alternative release scenarios.
Seismic Assessment	Director of EHS ³	<ul style="list-style-type: none"> • Ensures Seismic Assessment is performed on new/modified hazardous chemicals. • Ensures Seismic Assessment is revalidated every five years. • Ensures all recommendations are addressed in a timely manner. • Retains all Seismic Assessment reports and resolutions to all recommendations for the life of the process.
CUPA Risk Management Plan <i>(Includes Five Year Accident History)</i>	Director of EHS ³	<ul style="list-style-type: none"> • Responsible for preparing and submitting the RMP to Los Angeles County Fire Department. • Updates and re-submits the RMP every five years. • Corrects and re-submits the RMP within 30 days of a change in the facility's emergency contact. • Updates/revise and re-submits the RMP based on the criteria listed below.

Recordkeeping & Update Requirements

Prevention Programs & Technical Studies

The recordkeeping and update requirements for each PSM/CalARP Program element are summarized in Table 2. Unless otherwise specified in the table, records supporting the implementation of the program will be retained for at least five years.

TABLE 2 PSM/CalARP Program Recordkeeping & Update Requirements

PSM/CalARP Program Section	Recordkeeping and/or Update Frequency
Process Safety Information	<ul style="list-style-type: none"> Update if a major change occurs that makes the information inaccurate. PSI should be updated prior to implementing the change.
Process Hazard Analysis	<ul style="list-style-type: none"> Perform initially prior to introduction of a new chemical. Revalidate every five years. Review and update prior to introduction of a new chemical. Retain all studies, including the resolutions to all recommendations, for the life of the process. See PSM/CalARP Program Recommendations below.
Operating Procedures	<ul style="list-style-type: none"> Update as necessary to reflect current practice or whenever the tasks or steps are found to be inadequate or inaccurate. Update if there are changes to regulated chemical inventory. Procedures should be updated prior to needing their use. Certify procedures annually. Retain completed certification forms for at least five years.
Training	<ul style="list-style-type: none"> Provide training initially and every three years thereafter. Provide training in any new or updated procedures prior to needing to use the procedures.
Contractors	<ul style="list-style-type: none"> Obtain and review contractor safety programs and training prior to hire. Evaluate contractor performance at project completion (for one-time use contractors) or annually (for ongoing contractors).
Management of Change & Pre-Startup Safety Review	<ul style="list-style-type: none"> Complete forms prior to implementing the change.
Mechanical Integrity	<ul style="list-style-type: none"> Perform periodic visual inspections.
Hot Work Permit	<ul style="list-style-type: none"> Complete permit prior to performing hot work.
Incident Investigations	<ul style="list-style-type: none"> Initiate investigation within 48 hours of the incident. See PSM/CalARP Program Recommendations below.
Emergency Planning and Response	<ul style="list-style-type: none"> Review EAP annually and update as necessary. Provide training and conduct drills annually.

PSM/CalARP Program Section	Recordkeeping and/or Update Frequency
Compliance Audits	<ul style="list-style-type: none"> • Perform audit every three years. • Retain the two most recent audit reports, along with the resolutions to the recommendations. • See PSM/CalARP Program Recommendations below.
Hazard Assessment	<ul style="list-style-type: none"> • Conduct initially prior to introduction of a new chemical. • Update every five years. • Update within 6 months of a change that increases or decreases the distance to the toxic endpoint by a factor of two or more.
Seismic Assessment	<ul style="list-style-type: none"> • Conduct initially prior to startup of a new or modified process. • Revalidate study every five years. • See PSM/CalARP Program Recommendations below.
PSM/CalARP Program Recommendations	<ul style="list-style-type: none"> • Resolve recommendations as follows: <ul style="list-style-type: none"> ○ For PHA studies, within 2.5 years of performing the study. ○ For Incident Investigations, within 1.5 years of completing the investigation or 2 years following the incident, whichever is earlier. ○ For Compliance Audits, within 1.5 years of performing the audit. ○ For Seismic Assessments, address and resolve in a timely manner. • Retain documentation / supporting evidence that shows completion of recommendations.

CalARP Risk Management Plan

OES CalARP regulations require Inland Star Distribution Centers, Inc. to either: 1) update and resubmit, or 2) correct the Risk Management Plan based on certain activities. Events triggering an update / resubmission versus a correction are defined below. All updates and corrections must be submitted to Los Angeles County Fire Department within the specified timelines.

Update / Resubmission: A full update of the Risk Management Plan is required based on the following criteria. Resubmission of the plan as a result of items #2-7 will reset the five year submittal deadline.

- 1) At least once every 5 years from the date of its initial submission or most recent update required by items #2-7 below;
- 2) No later than 3 years after a newly regulated substance is first listed by EPA and/or the California OES;
- 3) No later than the date on which a new regulated substance is first present in an already covered process above a threshold quantity;
- 4) No later than the date on which a regulated substance is first present above a threshold quantity in a new process;

- 5) Within 6 months of a change that requires a revised PHA;
- 6) Within 6 months of a change that requires a revised offsite consequence analysis (Hazard Assessment); and
- 7) Within six months of a change that alters the Program Level that applied to any covered process.

Correction: The affected sections of the Risk Management Plan should be revised and corrected based on the criteria listed below. Since a correction is not a full update, submission of the plan will not reset the five year deadline.

- a) New Accident History Information – For any accidental release meeting the Five Year Accident History reporting criteria, Inland Star Distribution Centers, Inc. will submit the required data elements and a revised Executive Summary with respect to that accident within 6 months of the release or by the time the RMP is updated under the full resubmission criteria listed above, whichever is earlier.
- b) Emergency Contact Information – Within one month of any change in the emergency contact information listed in the RMP.

Process Modifications

In the event that Inland Star Distribution Centers, Inc. intends to make a change to the hazardous chemical inventory that may result in a significant increase in either: the amount of hazardous chemical handled at the facility; or the risk of handling the chemical as compared to the amount of risk identified in the RMP, then Inland Star Distribution Centers, Inc. will do the following:

- 1) Notify the CUPA (Los Angeles County Fire Department) in writing of the intent to modify the chemical inventory at least five calendar days before implementing any modifications. As part of the notification process, Inland Star Distribution Centers, Inc. will consult with the CUPA when determining whether the RMP should be reviewed and revised.
- 2) Implement the Management of Change and Pre-Startup Safety Review procedures.
- 3) Revise the appropriate documents, as required in item #1 above, expeditiously, but no later than 60 days from the date of the modification.

De-Registration

In the event that this facility becomes no longer subject to the applicability requirements of the OES CalARP regulations, Inland Star Distribution Centers, Inc. will submit a de-registration to Los Angeles County Fire Department within six months. The de-registration will indicate that the site is no longer covered.

Attachment A: Organization Chart

