

	QUALITY PLAN SYSTEM LEVEL PROCEDURE ISO 9001:2008 SOC NEVADA LLC	DOCUMENT NO.
		QP.EMS.HG.0011
	TITLE	REV. 8
EMPLOYEE PARTICIPATION- STANDARD PROCEDURE FOR THE MERCURY STORAGE AND TRANSFER PROGRAM TO COMPLY WITH THE NDEP- CAPP		PAGE 1 OF 6

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APPROVAL SIGNATURES		
PREPARED/REVIEWED BY:	<i>Karli Wilbur</i>	DATE 5/19/16
	KARLI WILBUR SOC DCA, BASE OPERATIONS	
PREPARED/REVIEWED BY:	<i>Kristi Lamell-Schilling</i>	DATE 5/17/16
	KRISTI LAMELL-SCHILLING, SOC ASSISTANT MANAGER ENVIRONMENTAL SERVICES	
REVIEWED & APPROVED BY:	<i>David Larsen</i>	DATE 5/19/16
	DAVID LARSEN, DIRECTOR SOC BASE OPERATIONS	
REVIEWED & APPROVED BY:	<i>Tom Erickson</i>	DATE 5/17/16
	TOM ERICKSON, MANAGER SOC ENVIRONMENTAL SERVICES	
REVIEWED & APPROVED BY:	<i>Rob Mathias</i>	DATE 6/13/16
	ROB MATHIAS, MANAGER DLA STRATEGIC MATERIALS FACILITY	
REVIEWED & APPROVED BY:	<i>Charles R. King</i>	DATE 6/27/16
	CHARLES KING, REPRESENTATIVE HWAD GOVERNMENT STAFF	
<input type="checkbox"/> INITIAL RELEASE <input type="checkbox"/> REVIEW, NO REVISION REQUIRED <input checked="" type="checkbox"/> REVIEW - REVISION REQUIRED (SEE HISTORY BELOW)		

REVISION HISTORY			
REV	CHANGE DESCRIPTION	AUTHOR	DATE
8	Updated signatory authority to reflect current required signatures. Took out column for Hawthorne Site Supervisor as Rob Mathias will be reviewing and signing.	Cody Burke/Karli Wilbur	05/2016
7	Change description Crosswalk Between NDEP CAPP Review Comments (dated 2014-12-09, 2015-01-30 and 2015-02-26) and Mercury Storage and Transfer Program Document Contents March 10, 2015	Burton Packard and Renee Rodriguez	03/2015
6	Reformatted document to comply with the QMS standard 9001. Changed wording document throughout to state Mercury Storage and Transfer Program. Added DLA personnel responsibilities of the CAPP Training Program procedure. Added administrative changes to the signature block. All Tier 1 documents are available on the G-drive: G:\Intranet\Environmental\environmental_programs\air\CAPP from Intranet	Robert Mathias, SOC FES/ Renee Little BOP's Secretary	09/2014
5	Added Approval Signatures to this document. Added the following to the Approval Signatures, "By reviewing and approving this procedure, the approver understands and will comply with the state procedure. Your signature is proof that training has been provided. The approver also understands that he/she may withhold their signature if he/she has questions about the content and may contact SOC Environmental Services to resolve questions." MOC	Yvonne Downs, SOC Env/ Rob Mathias, SOC FES/ Cheri Bryant, SOC Security/ Melissa Waggoner, SOC QA/ Jason Cardenas, SOC HR/ Nancy Rutherford, SOC HR/ Wayne Larson, SOC Safety/ Julie Moss, SOC Maintenance/ Mark Jackson, SOC Eng	06/14/11

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	#0051 Meeting held 05-25-11/Added Safety Office Mgr, QA Mgr, & HR Mgr to signature lines and updated personnel titles. Updated personnel titles/ Commander would like HWAD Representative to sign documents.	Leanne Cornell, SOC HR/ Suzy Berry, SOC QA/ Via email – Teresa McNally, SOC Traffic/ Herman Millsap, DLA/ Tom Erickson, Dir	
4	Name change from DZHC to SOC. Added Performance Management Support Group Director to signature line and changed Base Operations to Installation Site Support Services. Added Business Management Director to signature line.	Yvonne Downs, Env Svcs	01/19/1 1
3	Added, "(Intranet)" to those references and supporting documents where the current version of these documents can be found on the intranet and placed bullets on the reference documents.	Yvonne Downs, Env Svcs/ Herman Millsap, DLA/ Sandra Carroll, Tetra Tech	09/23/1 0
2	Initial Entry	Yvonne Downs, EMS Rep & Mgr DZHC Env Svcs/ Tom Fitzgerald, Mgr Eng/ Jason Aviles, Eng Svcs/ Mike Rolland, Eng Svcs/ Carlos Isom, Base Ops/ Ryan Keuhey, Base Ops/ Rob Mathias, FES Chief/ Tim Rutherford, FES/ Dave Womack, FES/ Dave Musselman, Mgr F&U/ Hugh Qualls, Dir BOD/ Steve Wilson, Base Ops/ Melissa Waggoner, QA/ Tad Williams, Env Svcs/ Herman Millsap, DLA Rep/ Sandra Carroll, Tetra Tech	04/20/1 0

REFERENCE DOCUMENTS	
DOCUMENT NUMBER	DOCUMENT TITLE

DOCUMENTS REFERENCED IN THIS PROCEDURE ARE APPLICABLE TO THE EXTENT SPECIFIED HEREIN.

1. PURPOSE

To provide employees who support the Mercury Storage and Transfer Program the opportunity to participate in Environmental, Health and Safety processes as required by the Nevada Division of Environmental Protection's (NDEP) Chemical Accident Prevention Program (CAPP). Chemicals of concern are mercury and carbon dioxide in the Mercury Storage and Transfer Program.

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2. ACRONYMS

- **ACO** – Administrative Contracting Officer
- **CAPP** - Chemical Accident Prevention Program
- **EMS** – Environmental Management System
- **FES** - Fire & Emergency Services
- **HWAD** - Hawthorne Army Depot
- **IOP** - Internal Operating Procedures
- **ISO** - International Organization for Standardization
- **JSA** - Job Safety Analysis
- **MOC** - Management of Change
- **NAC** – Nevada Administrative Code
- **NDEP** - Nevada Division of Environmental Protection
- **NRS** – Nevada Revised Statutes
- **OHSAS** - Occupational Health & Safety Assessment Series
- **PHA** - Process Hazard Analysis
- **PSI** - Process Safety Information
- **PSSR** - Pre-Startup Safety Review
- **QC** – Quality Control
- **QMP** - Quality Management Plan
- **QP** – Quality Procedure
- **SOC** – SOC Nevada LLC
- **SOP** – Standard Operating Procedure, including Quality Procedures (QP), Internal Operating Procedures (IOP), Standard Procedures (SP), Quality Management Plans (QMP), permits and letters of instruction
- **SP** - Standard Procedure
- **MMTS**- Mobile Mercury Transfer System

3. REGULATORY REQUIREMENTS

Regulatory requirements for employee participation under CAPP are in the Nevada Administrative Code (NAC):

NAC 459.95431 Employee participation. (NRS 459.3818, 459.3833) The owner or operator of a facility with a process that is subject to CAPP shall:

1. Develop a written plan of action regarding the implementation of the employee participation required by this section;
2. Consult with employees and their representatives about:
 - (a) Conducting and developing process hazard analyses; and
 - (b) Developing and implementing the other requirements of NAC 459.95412 to 459.95442, inclusive; and
3. Provide to employees and their representatives access to process hazard analyses and other information which is developed pursuant to NAC 459.95412 to 459.95442, inclusive.

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4. PARTICIPATION

1. General site awareness training of the mercury storage and transfer operation has been/will be provided to all employees and other site personnel who are involved in the Mercury Storage and Transfer Program. All HWAD employees involved in the Mercury Storage and Transfer Program, including government staff, SOC Nevada LLC (SOC) staff and subcontractors, can (a) access the Mercury Storage and Transfer Program documentation including procedures, plans, and/or reports on the G-drive (G:\Intranet\Environmental\environmental_programs\air\CAPP from Intranet), (b) access all supporting Safety, Health, or Environment documentation via the G-drive (G:\Intranet\Environmental\environmental_programs\air\CAPP from Intranet), and (c) request and obtain printed copies of the supporting CAPP documents from the SOC Environmental Services Manager or designee. Supporting documentation that is available to employees includes:
 - Management System and Implementation Plan, Chemical Accident Prevention Program for the Hawthorne Army Depot Mercury Storage and Transfer Program
 - Process Safety Information (PSI) Procedure and supporting documents
 - Process Hazard Analysis (PHA) Procedure, PHA reports and supporting documents
 - Standard Operating Procedure (SOP) Program and supporting operating procedures
 - Training Plan for the Mercury Storage and Transfer Program
 - Mechanical Integrity Procedure and supporting operating procedures
 - Management of Change (MOC) Standard Procedure
 - Pre-Startup Safety Review (PSSR) Procedure and supporting documents
 - Compliance Audit Program
 - Incident Investigation Standard Procedure
 - Safety Hot Work Permit
 - Employee Participation Procedure
 - Contractor Program
 - HWAD Emergency Operations Plan (including Emergency Response and Actions)
 - Lockout/Tagout Procedure
 - As-Built Drawings
 - Mobile Mercury Transfer System Operating Procedures

2. The SOC Environmental Services Manager and the DLA Strategic Materials Mercury Program Manager are responsible for developing and maintaining the Employee Participation program. The managers who signed this document will be called upon as needed to participate in ensuring that the Employee Participation program is current and represents all the activities occurring and workers employed in the Mercury Storage and Transfer Program.

3. Employee participation for the mercury program workers includes the development and implementation of documents supporting the Mercury Storage and Transfer Program. Affected CAPP elements include the PSI, PHA, PSSR, Training, Mechanical Integrity, MOC, Compliance Audits, Incident Investigation, Contractor Program, Emergency Response Program, Employee Participation, SOPs including Safety Hot Work Permit Procedure, Lockout/Tagout Procedure, IOPs and SPs.

4. All HWAD and DLA Strategic Materials employees performing work related to the Mercury Storage and Transfer Program and their representatives have been/will be consulted throughout the process of developing the PHA

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4. PARTICIPATION (CONTINUED)

and other documents supporting the CAPP (see the list of documents in Item 3). During the annual review of the Mercury

Storage and Transfer Program, DLA Strategic Materials, and annual refresher training, the SOC Environmental Services Manager and DLA Strategic Materials Mercury Program Manager will invite all HWAD and DLA Strategic Materials employees associated with the Program to participate in the review and revision of the CAPP elements. The SOC Environmental Services Manager or designee will document all participation.

5. All communications regarding Safety, Health and Environment follow the appropriate management system requirements as detailed in ISO 14001 for Environmental Management Systems, ISO 9001 for Quality and OHSAS 18001 for Safety and Health. Each of these ISO/OHSAS programs can be found on the G-drive (G:\Intranet\Environmental\environmental_programs\air\CAPP from Intranet) and are also on file in the SOC Environmental Services Office, SOC Quality Assurance Office, and SOC Safety Office. DLA Strategic Materials employees may access HWAD-specific Safety, Health and Environmental information through the "IAmTheKey" website. The respective manager for each of these programs is responsible for ensuring that program information is available as cited in paragraph 1 of the Participation Section of this procedure.
 - (a) The ISO 14001 Communications Standard Procedure states in part:

"All personnel are responsible for reporting EMS shortcomings, deficiencies and incidents to their Environmental Services, Manager, Director or appropriate Supervisory person. If the Supervisory person is not available, employees should report directly to the SOC Environmental Staff,"
6. All employees will follow the Environmental Policy for SOC and the HWAD.
7. This document will be reviewed and signed off annually. The level of compliance with this Employee Participation Procedure will be evaluated every three years during the Compliance Verification Audit with emphasis on documentation of consultations conducted.
8. The SOC Environmental Services Manager and DLA Strategic Materials Mercury Program Manager are responsible for managing the Employee Participation Procedure within the Mercury Storage and Transfer Program. However, responsibilities for consultation with employees and documentation of those consultations are shared by the SOC Environmental Services Manager and other managers, as found on the approval signatures listed below, depending on the specific CAPP element affected.
9. The integration of the CAPP requirements is the responsibility of the SOC General Manager.
10. The Approval Signatures and Document Change History are found on the Employee Participation Procedure and other documents supporting the CAPP requirements (i.e., PSI, PHA, SOP including Safety Hot Work Permit Procedure, Lockout/Tagout Procedure, training, mechanical integrity, MOC, PSSR, compliance audit, incident investigation, contractor program, emergency response, etc.) to record who participated and who is responsible for approval. The changes making up the latest revision are documented in the revision history section. It is the responsibility of management and workers to ensure that all documents are current. Check the document revision history; advise management if existing conditions do not accurately reflect document content. Each worker is responsible to ensure that the document being followed is the current version.

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5. RECORDS

Records documenting employee participation, such as comments/concerns on CAPP documents (see item 1 under Participation of this procedure), reports of deficiencies or incidents, etc. will be maintained for five years by the affected manager.

6. REFERENCES AND SUPPORTING DOCUMENTS

- ISO 14001 Environmental Management Control of Standard Procedures and Documents (G-drive)
- OHSAS 18001 Quality Control of Standard Procedures and Documents (G-drive)
- ISO 9001 Control of Standard Procedures and Documents (G-drive)
- SOC Environmental Policy
- Management System and Implementation Plan, Chemical Accident Prevention Program for the Hawthorne Army Depot Mercury Storage and Transfer Program
- Process Safety Information (PSI) Procedure and supporting documents
- Process Hazard Analysis (PHA) Procedure, PHA reports and supporting documents
- Standard Operating Procedure (SOP) Program and supporting operating procedures
- Training Plan for the Mercury Storage and Transfer Program
- Mechanical Integrity Procedure and supporting operating procedures
- Management of Change (MOC) Standard Procedure
- Pre-Startup Safety Review (PSSR) Procedure and supporting documents
- Compliance Audit Program
- Incident Investigation Procedure
- Safety Hot Work Permit Procedure SOC.OHS.SP.0002 Chapter 10
- Lockout/Tagout Procedure SOC.OHS.SP.0002 Chapter 21
- Contractor Program (for information consult SOC Contract Administration and Purchasing)
- HWAD Emergency Operations Plan (including Emergency Response and Actions)

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