APPROVAL SIGNATURES

PREPARED/REVIEWED BY:	RENEE RODRIGUEZ, DCA BASE OPERATIONS	DATE 3/12/15
PREPARED/REVIEWED BY:	BURTON PACKARD, ASSISTANT MANAGER ENVIRONMENTAL	DATE 3/11/15
REVIEWED & APPROVED BY:	HUGH QUALLS, DIRECTOR BASE OPERATIONS	DATE 3/11/15
REVIEWED & APPROVED BY:	TOM ERICKSON, MANAGER ENVIRONMENTAL SERVICES	DATE 3/11/15
REVIEWED & APPROVED BY: BOYNTON.JASON.D.1228903430 Digitally signed by BOYNTON.JASON.D.1228903430 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=DLA, cn=BOYNTON.JASON.D.1228903430 Date: 2015.03.13 10:23:15 -04'00'	JASON BOYNTON, DEFENSE LOGISTICS AGENCY PROGRAM MANAGER	DATE
REVIEWED & APPROVED BY:	GARY AMUNSON, DLA HAWTHORNE SITE SUPERVISOR	DATE 3/11/15
REVIEWED & APPROVED BY:	CHUCK KING, HWAD GOVERNMENT ENVIRONMENTAL	DATE 3/12/15

[ ] INITIAL RELEASE | [ ] REVIEW NO REVISION REQUIRED | [ ] REVIEW - REVISION REQUIRED (SEE HISTORY BELOW)

REVISION HISTORY

REV	CHANGE DESCRIPTION	AUTHOR	DATE
6	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
5	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\CAPP**	Robert Mathias, SOC FES/ Renee Little BOP's Secretary	09/2014
4	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	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	06/14/11

	SOC Environmental Services to resolve questions." MOC #0051 Meeting held 05-25-11 Added Biz Mgmt Office Dir & M&L Dir to signature lines and updated personnel titles. Added "SOC" to SOC titles within document (i.e. "SOC" Supervisors are responsible for…) Updated personnel titles. Commander would like HWAD Representative to sign documents.	Jackson, SOC Eng Leanne Cornell, SOC HR/ Suzy Berry, SOC QA/ Via email – Teresa McNally, SOC Traffic/ Herman Millsap, DLA / Tom Erickson, PMSG Dir	
3	Name change from DZHC to SOC. Added Performance Management Support Group Director to signature line and changed Base Operations to Installation Site Support Services in the signature line.	Yvonne Downs, Env Svcs	01/19/11
2	Initial Upload	Yvonne Downs, EMS Rep & Mgr of Env Svcs/ Suzanne Berry, QA Mgr/ Rob Mathias, Chief FES/ Teresa McNally, Storage Planning Supervisor/ Jason Aviles, Eng Svcs/ Herman Millsap, DLA Rep/ Sandra Carroll, Tetra Tech ORNL Team	04/20/10
1	Employee Participation	All employees who are affected by Mercury Process. For a list of participants please see the sign-in sheet for the training that was provided.	03/17/10

REFERENCE DOCUMENTS	
DOCUMENT NUMBER	**DOCUMENT TITLE**
ISO 14001	Environmental Management System
ISO 18001	Occupational Health & Safety Program
ISO 9001	Quality Management System
459.95416	Nevada Administrative Codes

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

1. PURPOSE

The purpose of the Standard Operating Procedure (SOP) Program is to implement a system for the development, maintenance, approval, and control of documents issued for the Mercury Storage and Transfer Program. This SOP Program defines responsibilities and steps for creating, approving, reviewing, distributing, and maintaining documents issued for the storage Mercury Storage and Transfer Program at Hawthorne Army Depot (HWAD). This program applies to Tier 1 and Tier 2 documents issued for the Mercury Storage and Transfer Program, including internal operating procedures (IOP), standard operating procedures (SOP), operating procedures (OP), safe work practices (SWP), plans and reports per the HWAD Management System and Implementation Plan under the Chemical Accident Prevention Program (CAPP).

2. ACRONYMS AND DEFINITIONS

- **ADMINISTRATIVE CHANGE** – Any clerical change to a document or data that do not impact its basic intent (e.g., grammatical, template formatting, typographical fixes, etc.).
- **AUTHOR** – Person designated to create or revise a document.
- **CAPP** – Chemical Accident Prevention Program – Nevada Administrative Code 459.952 ff.
- **CERTIFY** – Annual verification of accuracy and completeness required for CAPP operating procedures.
- **DOCUMENT** – Procedure, work instruction, plan, manual or associated form that is used to (1) control the processes that affect the Mercury Storage and Transfer Program or (2) meet CAPP requirements.
- **EMPLOYEE PARTICIPATION** – includes (1) consult with affected Mercury Storage and Transfer Program employees (including contractors when appropriate) and their representatives about the development and implementation of Mercury Storage and Transfer Program documents issued in compliance with CAPP (such consultation may include pilot test/walk through of operating procedures) and (2) provide access to the Mercury Storage and Transfer Program documents.
- **EMS (ISO 14001)** - Environmental Management System – The part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy. Referred to as management system in this document, this applies to Tier 1 documents related to CAPP and defined below.
- **IOP** – Internal Operating Procedure
- **INTRANET** – Takes the place of the official document register for all ISO 14001:2004 documentation.
- **ISO** – International Organization for Standardization
- **OHSAS (18001)** – Safety Management System
- **OP** - Operating procedures
- **QMS (ISO 9001)** – Quality Management System – Administered by QMS (ISO 9001)
- **SOC** – SOC Nevada LLC
- **SOP** - Standard operating procedures
- **SWP** - Safe work practices
- **TIER 1** – Administrative level documents, plans or procedures that outline programmatic requirements and/or are the guide to meeting specific requirements of a CAPP element or an administrative requirement; administered by EMS (ISO 14001)
- **TIER 2** – Operational level procedures or plans that provide instructions to a department, division or specific staff to perform the work to implement a Tier 1 document.

3. REGULATORY REQUIREMENTS

This procedure is required by the Nevada Division of Environmental Protection (NDEP) CAPP under Nevada Administrative Code (NAC) 459.95416. Specifically, the Mercury Storage and Transfer Program must comply with:

NAC 459.95416 Operating procedures. (NRS 459.3818, 459.3833)

1. The owner or operator of a facility with a process that is subject to CAPP shall develop and implement written operating procedures for that process which:
   (a) Are consistent with the process safety information developed pursuant to NAC 459.95412; and
   (b) Provide clear instructions for safely conducting such a process.

IT IS THE USERS RESPONSIBILITY TO ENSURE, PRIOR TO USE, THE REVISION OF THIS DOCUMENT IS THE LATEST AVAILABLE. CHECK THE MASTER LIST, IF UNSURE OF DOCUMENT STATUS, PRIOR TO USE. DOWNLOADED, PRINTED OR COPIED DOCUMENTS, UNLESS SUPPLIED AND SO INDICATED BY A DCA AS BEING A CONTROLLED DOCUMENT, ARE UNCONTROLLED

3. REGULATORY REQUIREMENTS (CONTINUED)

2. The operating procedures must include:
   (a) Steps for each operating phase, including, without limitation, steps for:
      (1) The initial start-up;
      (2) Normal operations;
      (3) Temporary operations;
      (4) An emergency shutdown, including, without limitation, a description of the conditions under which an emergency shutdown is required and the assignment of responsibility for a shutdown to a qualified operator;
      (5) Emergency operations;
      (6) A normal shutdown; and
      (7) Start-up following a turnaround or an emergency shutdown.
   (b) Operating limits, including, without limitation:
      (1) The consequences of a deviation; and
      (2) The steps required to correct or avoid a deviation.
   (c) Safety and health considerations, including, without limitation:
      (1) The properties of, and hazards presented by, the chemicals used in the process;
      (2) The precautions that is necessary to prevent exposure, including, without limitation, engineering controls, administrative controls and personal protective equipment;
      (3) Control measures to be taken if physical contact or airborne exposure occurs;
      (4) Quality control for raw materials;
      (5) Control of hazardous chemical inventory levels; and
      (6) Any special or unique hazards.
   (d) A description of the safety systems and their functions.

3. The owner or operator shall:
   (a) Ensure that the operating procedures are readily accessible to employees who work in or maintain an applicable process;
   (b) Review the operating procedures as often as necessary to ensure that they reflect current operating practice, including, without limitation, any change to a process that may result from a change in process chemicals, technology or equipment;
   (c) Certify annually that the operating procedures are current and accurate; and
   (d) Develop and implement safe work practices for employees and contractors to provide for the control of:
      (1) Hazards during a lockout or tagout;
      (2) Hazards during a confined space entry;
      (3) Hazards while opening the equipment or piping associated with a process;
      (4) Entrance into the facility by maintenance, contractor, laboratory or other support personnel; and
      (5) Any other hazards that may be encountered.

4. RESPONSIBILITIES

SOC General Manager, HWAD Commander, and DLA Project Manager are Responsible For:

- Reviewing and approving HWAD Mercury Storage and Transfer Program Tier 1 (programmatic level) procedures, plans and/or required reports and annually certifying accuracy and completeness of CAPP operating procedures.
- Ensuring affected staff has the opportunity to participate in the development or review of documents

Management Representatives for QMS (ISO 9001), EMS (ISO 14001), OHSAS (18001) and DLA Safety Manager are Responsible For:

- Preparing, monitoring, maintaining, and submitting documentation for approval.
- Preparing, ensuring review of, approval and maintenance of procedures.
- Preparing, ensuring review of, approval and maintenance of Mercury Storage and Transfer Program procedures (including employee participation), plans or reports; and contacting the Environmental Services Manager with proposed changes to prompt the evaluation for Management of Change.
- Maintaining records documenting employee participation for CAPP-issued documents for five years.

SOC Manager of Environmental Services is Responsible For:

- Ensuring that the current revisions of all Tier 1 documents are in the EMS/ISO 14001 system.
- Maintaining the current revision of all Tier 2 documents.

SOC and DLA Strategic Materials Supervisors Are Responsible For:

- Assigning Management Representatives to prepare/review the existing and/or new CAPP documents.

SOC / DLA Strategic Materials Employees and Supervisors Are Responsible For:

- Ensuring the document being used is the latest revision available, when appropriate. Each Tier 1 and all Tier 2 documents formatted in accordance with the SOC Quality Plan contain the following statement: It is the user's responsibility to ensure, prior to use, the revision of this document is the latest available. Check the master list, if unsure of document status, prior to use. Downloaded, printed or copied document, unless supplied and so indicated by a DCA as being a controlled document are uncontrolled. Each MMTS Operating Procedure contains the following statement:

  NOTE: Hard copies of this document may not be the current version. Refer to the "IAmTheKey" to verify the current version."

- Maintaining document legibility, including its identification.
- Following the procedures in such documents.
- Verifying that Mercury Storage and Transfer Program documents provide clear instruction to the affected employees/operators; if instruction is not clear, then they submit comments to the author through their Chain of Command.

5. PROCEDURE FOR DEVELOPMENT, MAINTENANCE AND CONTROL OF DOCUMENTS

Document Creation and Approval

- Documents will be created to establish, maintain, and ensure compliance with CAPP requirements for the Mercury Storage and Transfer Program. In addition to those documents required by the CAPP regulations (NAC 459.952 and following) for the Mercury Storage and Transfer Program, each organization shall determine which documentation (e.g., QPs, IOPs, and plans etc.) is required to support CAPP. To ensure compliance with CAPP, managers must consider all appropriate operating scenarios and ensure appropriate procedures are developed. Each organization shall appoint a knowledgeable and responsible employee who has received training in CAPP requirements to author and maintain required and necessary documentation. Refer to the Training Plan for the Mercury Storage and Transfer Program.

- The need for a document should be considered carefully before creating a document. If the requirements are adequately addressed in another document, or can be incorporated into an existing document without adversely affecting the process or the effectiveness of the Mercury Storage and Transfer Program, there is no need to create additional documents.

- The author shall ensure that the proper format (e.g., QP, IOP, SWP, etc.) for the document is used. Additionally, the author shall ensure that:
  - Documents provide clear instruction.
  - Titles are assigned that do not conflict with other documents.
  - The title is duly noted on the document.
  - The latest revision number (or date) is noted on the document in the appropriate block.
  - CAPP operating procedures and safe work practices comply with NAC 459.95416 and that CAPP system level documents (1) define how each requirement of each CAPP element will be implemented and (2) follow the EMS (ISO 14001) system to control Tier 1 documents to ensure information is current.
  - Tier 2 documents, including MMTS Operating Procedures, will have the latest revision number noted on the document in the appropriate block and will follow the EMS document control system to ensure information is current.
  - The Tier 2 document author's name (a first initial and last name is acceptable) is listed and the date of the revision is effective.
  - The changes making up the latest revision are documented in the revision history section.

- The author shall complete all other applicable sections of the document addressing all applicable (environment, safety and/or health) requirements.

- When completed, the author shall:
  - Sign and date the document in the Prepared or Reviewed By block of the APPROVAL SIGNATURES section;
  - Distribute the draft Mercury Storage and Transfer Program document for employee review/comment; and
  - Resolve those comments, if necessary, prior to issuing that document for approval.

Note: The employee review is intended to ensure/verify that the document provides clear instruction to the affected employees and gain their input (refer to the Employee Participation Procedure).

5. PROCEDURE FOR DEVELOPMENT, MAINTENANCE AND CONTROL OF DOCUMENTS (CONTINUED)

- The document reviewer/approver shall review the document to ensure all applicable requirements are addressed.

- When a document fails to address all requirements and/or employee feedback is issued – Return the document to the author, with comments for further development. Repeat this process until the document is found to be satisfactory. When complete, the author forwards the document for final approval/signature.

  - Records documenting employee participation, such as comments/concerns on CAPP documents (see item 1 under Participation in the Employee Participation Procedure), will be maintained for five years by the author. Refer to the list of CAPP documents (Tier 1 and 2) in the Management System and Implementation Plan for the Mercury Storage and Transfer Program that are subject to this SOP Program.

- When the document is found to be satisfactory, the document approver shall sign and date the document in the Approved By block in the APPROVAL SIGNATURES section and return to the document author.

- The author shall forward the document to the Manager of Environmental Services.

- Documents shall be made available at points of use as required, under the requirements of this procedure, and maintained so that they remain legible and readily identifiable.

Document Review, Certification and Re-Approval

- Active documents (both Tier 1 and Tier 2) are to be reviewed at least annually to ensure continued effectiveness, or more frequently if evidence suggests a procedure may require revision. Proposed revisions to CAPP documents may trigger evaluations per the Management of Change Standard Procedure. A knowledgeable and responsible employee who has received training in the CAPP requirements shall be appointed to review documents and author changes as required. Documents may be reviewed at a greater frequency than annually if needed to maintain effectiveness.

- Document reviews will be conducted at least within 10 months of the most recent review, or more frequently if evidence of need or an MOC occurs. The EMS manager shall maintain the schedule for document reviews."

- The SOPs will be reviewed to determine if they are consistent with current operating practice. Special attention will be given to any changes to the process(s) that may have resulted from changes to equipment, materials or infrastructure.

- Documents shall be reviewed to ensure that the document is still needed, is pertinent, effective and addresses all requirements. If changes are identified during document review, such changes shall be incorporated into the document. However, proposed changes to Mercury Storage and Transfer Program documents must be evaluated per the Management of Change procedure prior to revision.

- Reviewed/revised documents shall be completed, reviewed and re-approved in accordance with this procedure.

5. PROCEDURE FOR DEVELOPMENT, MAINTENANCE AND CONTROL OF DOCUMENTS (CONTINUED)

- The HWAD Commander and the SOC General Manager shall certify the accuracy and completeness of CAPP Tier 1 procedures annually based on the annual review conducted above.

External Documents
Documents from external origin/sources (such as codes, standards, vendor manuals, vendor drawings, etc.) determined by the organization to be necessary for planning and operation of the Mercury Storage and Transfer Program are identified and their distribution controlled to the revision level necessary to comply with contractual and/or operational requirements. Therefore, systems, sub-systems, facilities and equipment built and operated to standards and codes that were in place years earlier may stipulate that a prior version/revision of a document from an external source is the required version for a given situation.

External Document Type	Document Control Determination
Technical Manuals and industry standards	Responsible manager identifies the technical manuals and industry standards that apply to the specific work activity.
External documents used for internal work processes	The author or responsible manager forwards the information to document coordinator for control distribution. If a unique identifier is not identified, one should be added.

Standard Operating Procedure Program Implementation (Tier 1)
- This document is available to Mercury Storage and Transfer Program personnel via the "I Am The Key" website.
- This document is controlled under the ISO 14001 Document Control Standard Procedure and under this procedure.
- Signatures on this document indicate training of personnel is being provided and documented.

Document Audits
Mercury Storage and Transfer Program documents (procedures, plans and reports) including this procedure will be audited under the Compliance Audit Program at a minimum of every three (3) years to evaluate the level of compliance with CAPP. Audits per the ISO 9001:2008 Quality Management System, the ISO 14001:2004 Environmental Management System and the OHSAS 18001 Safety Management System are also conducted at a minimum of every three (3) years.

6. RECORDS

Required records for the SOP Program include employee participation documentation for document review, document change histories, Management of Change documentation when changes are proposed for approved CAPP documents, annual certification of accuracy of procedures, and control of documents (e.g., document revision records). Records shall be maintained for a minimum of five years.

Records created or received as a result of work assignments, work tasks, or office projects performed to operating procedures should be accurate, legible and complete and submitted to the established filing system.

IT IS THE USERS RESPONSIBILITY TO ENSURE, PRIOR TO USE, THE REVISION OF THIS DOCUMENT IS THE LATEST AVAILABLE. CHECK THE MASTER LIST, IF UNSURE OF DOCUMENT STATUS, PRIOR TO USE. DOWNLOADED, PRINTED OR COPIED DOCUMENTS, UNLESS SUPPLIED AND SO INDICATED BY A DCA AS BEING A CONTROLLED DOCUMENT, ARE UNCONTROLLED

7. REFERENCES

- ISO 14001:2004 Environmental Management System – Control of Documents (Intranet)
- Management System and Implementation Plan for Chemical Accident Prevention Program, including Facility and Substance Information
- Management of Change Standard Procedure
- Training Plan for the Mercury Storage and Transfer Program
- Compliance Audit Program
- Employee Participation Procedure