TITLE

MANAGEMENT SYSTEM AND IMPLEMENTATION PLAN CHEMICAL ACCIDENT PREVENTION PROGRAM (CAPP) FOR THE MERCURY STORAGE AND TRANSFER PROGRAM AT THE HAWTHORNE ARMY DEPOT (HWAD)

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APPROVAL SIGNATURES

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CONCURRED 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: 2014.09.16 10:00:40 -04'00'	MANAGER DLA STRATEGIC MATERIALS SAFETY	DATE 9/2014
CONCURRED 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: 2014.09.16 10:07:07 -04'00'	MANAGER DLA STRATEGIC MATERIALS FACILITY	DATE 9/2014
APPROVED BY	GEORGE GRAM, GENERAL MANAGER SOC	DATE 9/2014
APPROVED BY	REPRESENTATIVE HWAD GOVERNMENT STAFF	DATE 9/2014
APPROVED BY HARDER.CHARLES.1229070270 Digitally signed by HARDER.CHARLES.1229070270 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=DLA, cn=HARDER.CHARLES.1229070270 Date: 2014.09.16 10:13:46 -04'00'	PROJECT MANAGER DLA STRATEGIC MATERIALS	DATE 9/2014

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

REVISION HISTORY

REV	CHANGE DESCRIPTION	AUTHOR	DATE
10	Removed all hyper links and some fonts to Arial size 10. Moved signature sheet and revision history to the front of the document. Updated signatory authority to reflect current required signatures. Changed "Receipt and Storage of Mercury" to "Mercury Storage and Transfer Program" throughout the document. Section 2.3. CAPP Organization was updated to reflect current organizational changes. The spacing in the document has been changed to match the QP format and the titles within the document were put in nested tables. The changes to the Mercury Storage and Transfer Program were implemented throughout the document to comply and support the CAPP requirements. Updated duties and responsibilities of DLA Strategic Materials personnel.	Robert Mathias, SOC FES/ Renee Little BOP's Secretary	9/2014

THIS DOCUMENT WILL BE REVIEWED AT LEAST ANNUALLY TO ENSURE ITS SUITABILITY

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REVISION HISTORY

REV	CHANGE DESCRIPTION	AUTHOR	DATE
9	Deleted, Environmental from Director of Safety; deleted, "Existing Mercury Storage Program documentation (procedures, plans, records, etc.) and any new documentation issued by the CAPP Team will be reviewed by DLA Strategic Materials or its contractors. After comment resolution by HWAD, CAPP documents will be distributed to Mercury Storage Program staff per the Employee Participation Procedure for review and comment before being issued in final for management review and approval. Employee participation will be documented per CAPP requirements. After HWAD management approval, CAPP documents will be submitted to NDEP. The exception to this process is the Contractor Program which has already been approved by NDEP." From section 3.1; changed, "developed" to "maintained" in section 3.1; deleted, ***3.5 NDEP CAPP Regulatory Crosswalk*** Regulatory Crosswalks (tabular summary by CAPP Element) were developed and used as tools to facilitate CAPP implementation at HWAD. This crosswalk lists APP-specific regulatory requirements by NDEP Element and then lists the SOC documents where each requirement is specified / covered within a HWAD plan or procedure. This detailed documentation serves to demonstrate the level of implementation across HWAD and was used during implementation to identify gaps during the implementation process. It can also be used to facilitate future self-assessments of the level of CAPP compliance per the Compliance Audit Program. Development of crosswalks is/was not required by NDEP's regulations. As such, the crosswalks do not have to be updated / maintained by HWAD. A copy of each CAPP Element Regulatory Crosswalk is available for review in the HWAD Mercury Storage Program Technical Library as a reference as to how the HWAD CAPP was initially designed and constructed. ***3.6 Implementation of CAPP*** The basic steps and the timing involved in implementing CAPP requirements are outlined below: NDEP Notification of CAPP Activity Reporting Form (NAC 459.95323) – due 10 days after a determination was made or an action is taken related to highly hazardous substances or explosives at a facility – Completed January 3, 2008 (see Appendix 2). For future registrations see the NDEP website for online annual reporting: http://ndep.nv.gov/CAPPTrack/. Copies of submitted information are maintained and available through the SOC Environmental Services Manager. Permit to construct: Not applicable per NDEP. Submittal of HWAD's certified CAPP Program documents for NDEP review and approval. NDEP on-site implementation audit and approval. HWAD conducts Pre-Startup Safety Review and implements any corrective actions. NDEP review of PSSR results/corrections and issuance of approval letter to HWAD approving mercury shipments commence to HWAD. Mercury shipments begin. Management of Change – constant. Training – constant. Mechanical Integrity – constant. Employee Participation – constant. Contractor Program – constant. Emergency Operations Plan – constant. Submittal of information to NDEP – when requested, information must be certified and submitted by the responsible official: the SOC General Manager and/or the HWAD Commander. Change in Ownership or Operator: due within 14 days of change in ownership or operator. Annual Certification: The SOC General Manager will certify annually in writing that the HWAD operating procedures are current and accurate, in compliance with NAC 459.95416. Annual Facility Registration: on or before June 21, information must be certified by responsible official. Annual Facility Fees: on or before July 1, except for 1st and 2nd fiscal (NDEP/state) years after commencement of CAPP. Compliance Verification Audit: certified at least every 3 years (36 months). Pre-Startup Safety Reviews: required for a facility modification that is significant enough to require a	Y. Downs	3/2013

REVISION HISTORY

REV	CHANGE DESCRIPTION	AUTHOR	DATE
	change in the process safety information and that is made after NDEP approval. Process Hazard Analysis Update and Revalidation: required every 5 years after initial PHA is approved". 6. **Contractor Program Requirements Under** NDEP regulations, HWAD must implement a system that ensures subcontractors hired by HWAD in support of the Mercury Storage Program will comply with applicable CAPP requirements. Those requirements are identified below. It is the Contracting Office Representative's responsibility to ensure the subcontractor complies with all applicable CAPP requirements. **NAC 459.95435 Duties of owner or operator concerning contractors; duties of contractors.** (NRS 459.3818, 459.3833) 1. The owner or operator of a facility with a process that is subject to CAPP shall: (a) When selecting a contractor, obtain and evaluate information regarding the safety performance and programs of the contractor; (b) Inform the contractor of known potential fire, explosion or toxic release hazards related to the work of the contractor and to the process on which he is working; (c) Explain to the contractor the applicable provisions of NAC 459.9544 and 459.95442; (d) Develop and implement safe work practices consistent with NAC 459.95416; and (e) Periodically evaluate the performance of the contractor in satisfying the requirements of subsection 2.2. The contractor shall: (a) Ensure that each of his employees who will work on the process is trained in the work practices necessary to perform his job safely; (b) Ensure that each of his employees who will work on the process is instructed in: (1) The known potential fire, explosion or toxic release hazards related to his job and the process on which he is working; and (2) The applicable provisions of the emergency action plan; (c) Document that each of his employees who will work on the process has received and understood the training required pursuant to this subsection; (d) Prepare a record that contains: (1) The identity of the employee; (2) The date of training; and (3) The means used to verify that the employee understood the training; (e) Ensure that each of his employees who works on the process follows the safety rules of the facility, including, without limitation, the safe work practices required pursuant to NAC 459.95416; and (f) Advise the owner or operator of any unique hazards presented by or found during the work of an employee. 3. This section: (a) Applies to contractors who perform maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a process. (b) Does not apply to contractors who provide incidental services that do not influence process safety, including, without limitation, janitorial work, food and drink services, laundry, delivery or other supply services. Updated signature lines		
8	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 #0051 Meeting held 05-25-11 updated titles in the Org Chart. Added CAPP 2011 Registration Form. Commander would like HWAD Representative to sign documents.	Y. Downs	6/2011
7	Name change to SOC from DZHC added SHEQA Director updated CAPP Org Chart	Y. Downs	1/2011
6	Deleted, "No mercury processing will take place in the mercury storage warehouses." From page 1. Changed DLA/DNSC to DLA Strategic Materials. Changed font from 12 to 10 and script from New Times Roman to Tahoma.	Y. Downs	9/2010

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REFERENCE DOCUMENTS	
DOCUMENT NUMBER	DOCUMENT TITLE

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

1 Background

The Mercury Storage Program at Hawthorne Army Depot (HWAD) will involve the receipt and long-term storage of the DLA Strategic Materials inventory of mercury (approximately 4,436 metric tons; 4,890 tons). This mercury will be shipped from three DLA Strategic Materials facilities and will arrive at HWAD, operated by SOC Nevada LLC (SOC), prepackaged for long-term storage. The mercury is contained in three liter flasks, each with a gross weight of approximately 86 pounds. Six flasks are placed inside a 30-gal steel drum with tight fitting lid secured by a locking ring. Five of the 30-gal drums are then placed inside a drip pan and secured with steel banding on a wooden pallet. These palletized drums are in long-term storage at HWAD in a defined storage configuration in 14 warehouses. These warehouses are equipped with carbon dioxide fire suppression systems. Carbon dioxide is an asphyxiant and, as such, is a chemical of concern for the mercury storage operation.

The Mercury Transfer Program at Hawthorne Army Depot (HWAD) involves the transfer of the mercury stockpile stored at Hawthorne Army Depot (HWAD) from 3-liter steel flasks into new 1-metric ton (1-MT) steel containers to prepare the mercury stockpile for long-term storage that may extend beyond 40 years in the future. Transfer activities are to be accomplished within fume hoods inside a modular building with a controlled and monitored atmosphere. This facility is referred to as the Mobile Mercury Transfer System (MMTS) and is installed adjacent to HWAD Building 110-66, one of the 14 buildings where mercury is stored. Ventilation and air filtration equipment in the MMTS limits worker exposure to mercury vapor and prevents its release to the external environment.

Drums containing flasks of mercury are to be delivered on pallets to the MMTS by flatbed truck. Each drum is 30-gallons in size and within it are six flasks and packaging; each flask contains 76 lb of mercury. Five drums are stored on a pallet. After the 1-MT containers are filled with mercury, they are placed inside Building 110-66. After the long-term storage capacity of Building 110-66 is reached, the filled 1-MT containers are transferred in groups to other mercury storage buildings for long-term storage. Completing the Mercury Transfer Program will take about 15 years.

Each 1-MT container is a specially designed and constructed cylinder and it holds the contents of 29 3-liter flasks. Five 30-gallon drums (the contents of one pallet) contain 30 3-liter flasks. A 1-metric ton container has a slightly larger diameter than a 30-gallon drum [20-inch external diameter versus 19¼-inch external diameter (including the rolling hoops)]. After the transfer operations are complete the footprint of the mercury stockpile would be substantially reduced; it is projected that seven of the current 14 buildings will be needed to store the entire stockpile when fully transferred.

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In 1991, the Nevada Legislature passed the Chemical Catastrophe Prevention Act (Senate Bill 641, codified at NRS 459.380 through 459.3874), which required the Nevada Division of Environmental Protection (NDEP) to develop and implement a chemical accident prevention program (CAPP). NDEP subsequently enacted CAPP regulations that established requirements for facilities that have or will have select, highly hazardous substances in quantities above defined thresholds [Nevada Administrative Code (NAC) 459.952 through 459.955, Regulation of Highly Hazardous Substances and Explosives]. The CAPP stresses hazard identification and accident prevention; the intent is to predict what could possibly go wrong and take appropriate measures to minimize the possibility of an accident occurring. Excerpts of the NDEP regulations are provided below. One of the first steps HWAD has undertaken is the development of a CAPP management system (NAC 459.95341) designed to facilitate the implementation of the receipt and long term storage of mercury at HWAD.

Mercury (elemental, Chemical Abstracts Registry No. 7439-97-6) is one of the hazardous chemicals regulated by the NDEP under CAPP. The CAPP threshold for mercury is 200,000 lbs. The 14 mercury storage warehouses at HWAD each would store greater than 200,000 lbs after all the mercury is received.

1.1 Excerpts from the NDEP Regulations

NAC 459.95332 Duties of owner or operator of facility. (NRS 459.3818, 459.3833) The owner or operator of a facility that has a process which is subject to CAPP shall:

1. Register annually with the Division pursuant to NAC 459.95348, 459.9535 and 459.95354;
2. Pay the annual fees pursuant to NAC 459.95334 if the facility contains one or more processes and does not have explosives manufacturing operations;...
3. Develop a management plan system pursuance to NAC 459.95341;

NAC 459.95341 Management system; implementation plan. (NRS 459.3818, 459.3833) **The owner or operator of a facility with a process that is subject to CAPP shall develop:**

1. A management system to oversee the implementation of all program requirements and
   (a) Assign a qualified person to have overall responsibility for the development, implementation and integration of the requirements of CAPP; or
   (b) Create a team with overall responsibility for the development, implementation, and integration of the requirements of CAPP. The owner or operator shall document:
      (1) The names of the persons who are members of the team; and
      (2) The relevant lines of authority for the team by means of an organization chart or similar document.
2. An implementation plan that covers each element of the prevention program and each element of the Emergency Response Program. The implementation plan must also define how each requirement of each such element will be implemented at the facility and must provide a system that requires all information and documentation be controlled in a manner which ensures that the current information and documentation is in circulation and in use.

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1.2 CAPP Elements

The NDEP regulations, guidance, and program checklists recognize the following 14 program elements:

I. *Facility & Substance Information* (facility name, location, contact information, organization, substance information, etc.)
II. *Process Safety Information* (processes/equipment involved with the chemicals of concern, safety information, etc.)
III. *Process Hazard Analysis* [(PHA) assessment of process hazards, consequences, engineering and administrative controls, human factors, external factors]
IV. *Standard Operating Procedures Program* (startup, safety, day to day operations, Lockout/Tagout, hot work permits, etc.)
V. *Training Program* (initial and refresher training based on position/job assignment on: process overview, procedures, safety and health hazards, emergency operations, management of change program)
VI. *Mechanical Integrity* (equipment and preventive maintenance, frequency of maintenance, quality assurance, training)
VII. *Management of Change* (process for evaluating the need for and consequences of changes to the program and documenting the decisions/changes made)
VIII. *Pre-Startup Safety Review* (verification of procedures, process hazard analysis, management of change)
IX. *Verification of Compliance Audit* (self-assessment every three years and documentation of the level of compliance with CAPP requirements, followed by implementation of corrective actions, if needed, for any deficiencies identified)
X. *Incident Investigation* (process of identifying causes of incidents and implementation of steps to prevent similar events from occurring by implementing corrective actions)
XI. *Employee Participation* (system to ensure affected employees are kept informed about the facility's CAPP program and can provide feedback)
XII. *Contractor Program* (assigns facility and contractor responsibilities for meeting program requirements)
XIII. A. *Emergency Action Plan* (reporting procedures, evacuation procedures, facility alarm systems, etc.)
B. *Emergency Response Plan* (hazardous materials response program including training, critique of response and follow-up, response plan coordination, etc.)

SOC & DLA Strategic Materials are implementing a CAPP compliance program using twelve procedures or program documents to meet the applicable CAPP requirements for the Mercury Storage and Transfer Program. Those procedures/program documents include:

- This Management System and Implementation Plan covering overall CAPP management and implementation/schedule, Element I: Facility and Substance Information and Element XII: Contractor Program.
- A Process Safety Information Procedure and supporting documentation for Element II.
- A Process Hazard Analysis Procedure and its supporting documentation (PHA Reports, PHA Addendums) for Element III.
- A Standard Operating Procedure Program, and its supporting operating procedures and safe work practices for Element IV.
- An SOC and DLA Strategic Materials Training Plan for the Mercury Storage and Transfer Program and

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supporting training modules for Element V.

- A Mechanical Integrity Procedure and its supporting operating procedures for Element VI.
- A Management of Change Standard Procedure with associated reporting forms for Element VII.
- A Pre-Startup Safety Review (PSSR) Procedure and supporting checklists for Element VIII.
- A Compliance Audit Program with associated reporting forms for Element IX.
- An Incident Investigation Standard Procedure with associated reporting forms for Element X.
- An Employee Participation Procedure for Element XI.
- The HWAD Emergency Operations Plan for Elements XIII A and B.

Element XII (Contractor Program) has been approved by NDEP previously and is based on existing HWAD contracting systems and documentation. Contractor Program requirements under CAPP are summarized Section 6 as found in the CAPP checklists.

2 HWAD Management System for CAPP

2.1 *Roles/Responsibilities for CAPP Integration and Implementation*

Both the HWAD Commander, General Manager of SOC (the Operating Contractor at HWAD), and DLA Strategic Materials are administratively responsible for the site-wide integration of the HWAD Mercury Storage and Transfer Program and for ensuring compliance with CAPP regulations. The SOC General Manager is responsible for day-to-day operations at HWAD, including the Mercury Storage and Transfer Program. The SOC General Manager has multiple years of experience in management of HWAD, or similar, operations including implementation of environmental, safety, health and quality assurance programs and, as such, is qualified to manage the CAPP for HWAD.

Key SOC, DLA Strategic Materials and HWAD government staff members identified below are assigned responsibilities for the development, implementation, and integration of the CAPP requirements into the HWAD environmental management system. Each has been specifically appointed to their job and CAPP-assigned role based on a combination of experience and education and are qualified to manage their assigned roles/responsibilities for the Mercury Storage and Transfer Program under CAPP.

The SOC Environmental Services and Mercury Storage and Transfer Program Managers are responsible for technical integration, development, implementation, and management of the CAPP requirements that apply to the HWAD Mercury and Transfer Program. SOC is responsible for fee payments and development of the CAPP Management Plan. The SOC Environmental Services Manager is responsible for Facility and Substance Information, Standard Operating Procedure, Employee Participation, Mechanical Integrity and Management of Change.

The Administrative Contracting Officer (ACO) Special Staff (Environmental), DLA Strategic Materials Project Manager and SOC Environmental Services Manager at HWAD are the technical leads for negotiations with regulators and submittal of Facility and Substance Information under CAPP. SOC Environmental Services Manager will implement the Pre-Startup Safety Review; technical responsibility for the Pre-Startup Safety Review of the Mercury Storage and Transfer Program is assigned to the DLA Strategic Materials Safety Manager. The Verification of Compliance Audit will also be implemented by the SOC Environmental Services Manager with

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support from ACO staff and Defense Logistics Agency DLA Strategic Materials staff.

The SOC Fire & Emergency Services Chief is responsible for the implementation and management of Incident Investigations (shared responsibility with SOC Safety Manager), the Emergency Response Plan and emergency actions.

The SOC Safety Manager and SOC Environmental Services Manager are responsible for and will jointly implement the Process Safety Information and Process Hazard Analysis. The SOC Safety Manager will also support the SOC Environmental Services Manager during implementation of the Pre-Startup Safety Review.

The SOC Contracts & Procurement and Safety Managers are responsible for implementing the Contractor Program. The SOC Safety Manager and the DLA Strategic Materials Safety Manager are responsible for evaluating the safety programs implemented by contractors, ensuring safe work practices are implemented by contractors, and ensuring training of contractor staff is provided and documented.

The SOC Environmental Services Manager and Human Resources Manager are responsible for the Employee Training, including development and issuance of the CAPP Training Plan and overseeing the design, implementation and tracking of generic and overview training modules that are required by the CAPP regulations. However, the actual design, implementation and tracking of functional or departmental specific training may be delegated to other Managers based on the scope, coverage and audience of the specific training.

Responsibility for the development and implementation of departmental procedures required by CAPP is assigned based on the scope of a given procedure. Responsibilities for procedures and plans are listed in Appendix 1. For example, the SOC QA Manager is responsible for developing and implementing QA driven, CAPP required procedures.

The HWAD CAPP team (Section 2.2) is jointly responsible for (1) identifying all operating scenarios through thorough review of the Process Safety Information and Process Hazard Analysis and (2) ensuring that all appropriate procedures have been developed. The Team (below) is responsible for the development and/or implementation of the Mercury Storage and Transfer Program and for working jointly to meet the CAPP requirements to obtain NDEP approval of the Mercury Storage and Transfer Program. HWAD Team members (comprised of SOC staff and HWAD ACO Staff & DLA Strategic Materials) will be responsible for ensuring day-to-day compliance with CAPP regulations after NDEP has approved the Mercury Storage Program.

2.2 *CAPP Team*

SOC: Base Operation's Director; Environmental Services Manager; Engineering Services; Equipment & Utilities Manager; Fire and Emergency Services Chief; Safety Manager; Business Management; Human Resources Manager & Training.
HWAD ACO: Environmental Coordinator or designee; Facilities Management Specialist; Environmental Protection Specialist; Safety and Occupational Health Specialist
DLA Strategic Materials[1]: Mercury Project Manager, Safety Manager, and Mobile Mercury Transfer System Facility Manager

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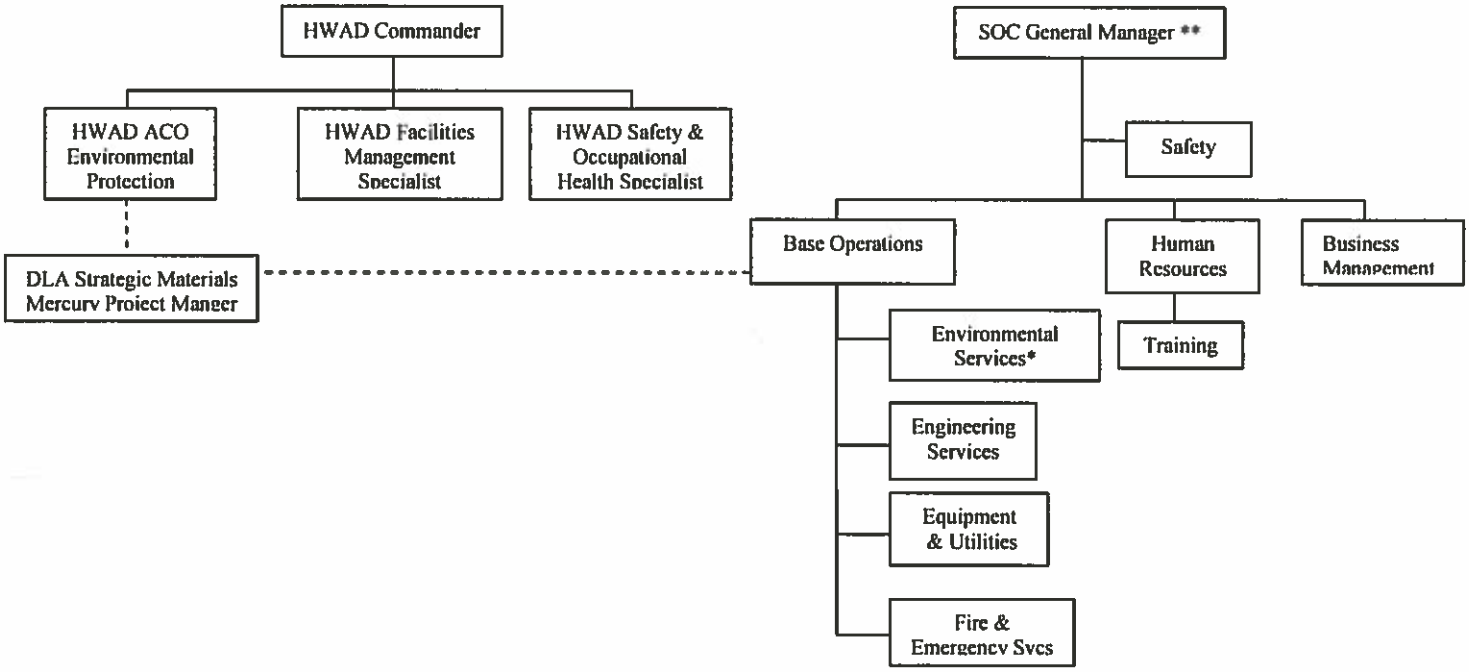
2.3. CAPP Organization

Refer to Figure 1 for the relevant lines of authority for the CAPP Team at HWAD.

HWAD Mercury Storage Program
CAPP Organization Chart



*Technical Lead for the HWAD CAPP Implementation
**Administrative Lead for the HWAD CAPP Integration

2.4 Roles/Responsibilities Post-Implementation

Additional SOC & DLA Strategic Materials specific roles and responsibilities are defined in each of the procedures/plans established for the CAPP elements. Oak Ridge National Laboratories (ORNL) and Tetra Tech provide technical support for program implementation but are not involved in day-to-day operations or post-implementation activities, unless contracted to do so.

3. HWAD CAPP Implementation Plan

3.1 *Procedure/Plan development/review/submittal process*

Existing Mercury Storage Program documentation (procedures, plans, records, etc.) and any new documentation

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issued by the CAPP Team will be reviewed by DLA Strategic Materials and its contractors. After comment resolution by HWAD, CAPP documents will be distributed to Mercury Storage and Transfer Program staff per the Employee Participation Procedure for review and comment before being issued in final for management review and approval. Employee participation will be documented per CAPP requirements. After HWAD management approval, CAPP documents will be submitted to NDEP. The exception to this process is the Contractor Program has already been approved by NDEP.

Plans and procedures maintained for each CAPP element will be written in compliance with the applicable CAPP regulations and will reflect the clarifying information in the CAPP guidance documents (checklists, data forms) issued by NDEP. HWAD procedures may also reflect best management practices as implemented by industry, military, or internationally accepted standards. Program level plans and procedures written to meet CAPP requirements will be designated as Tier 1 (administrative level); operating level procedures or plans written to comply with CAPP Program level documents will be designated as Tier 2, operational level documents (procedures or plans) (See Appendix 1), and supporting documentation will be designated as Tier 3. For CAPP purposes, HWAD recognizes:

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 CAPP requirement. Examples of CAPP-specific Tier 1 documents addressing elements include: Incident Investigation Standard Procedure, Management of Change Standard Procedure, Employee Participation Procedure, Pre-Startup Safety Review Procedure and Standard Operating Procedure Program. Other administrative or programmatic level documents include this Management System and Implementation Plan. In most cases, a new CAPP-specific procedure or plan has been issued to incorporate the Mercury Storage and Transfer Program (refer to Appendix 1). There are two exceptions where existing Tier 1 documents are being retained: the HWAD Emergency Operations Plan and Annex B and C for the Element XIII A & B Emergency Response and Emergency Action Plan, and HWAD Contractor Program documents for the Element XII Contractor Program. The Emergency Operations Plan (and the supporting Annex B and C) has been modified to meet CAPP requirements; whereas the existing HWAD Contractor Program documentation has been approved by NDEP.

Tier 2 – Operational level procedures or plans that guide/offer instructions to a department or division or to specific staff to do the work to implement a Tier 1 document (plan or procedure). The Tier 2 documents would normally be referenced within/linked to the Tier 1 document. Examples of Tier 2 documents include: Safety Hot Work Permit Procedure, Elemental Mercury Receipt and Storage Standard Operating Procedure, Mercury Monitoring and Response, and Refrigeration and Maintenance Plan. In some cases, a CAPP-specific procedure or plan has been issued; whereas in other cases, an existing operating procedure or plan has been modified or at least reviewed to ensure it meets CAPP requirements. Refer to Appendix 1 for the Tier 2 documents that support a specific Tier 1 document. A Tier 2 document may support more than one Tier 1 document, so in some cases, Tier 2 titles are not repeated.

Tier 3 – Documents that support or are referenced in the Mercury Storage and Transfer Program documents (either Tier 1 or 2). These may be in the form of reports, HWAD policies, or other HWAD administrative level procedures, such as QA Management System procedures (e.g., QA Control of Documents Standard Procedure), Environmental Management System procedures (e.g., EMS Control of Documents Standard Procedure) or Safety procedures or manuals. Examples of Tier 3 documents

include, but are not limited to technical memorandum reports such as those issued by Oak Ridge National Laboratory for DLA Strategic Materials, etc. These documents serve to supplement, support, or guide the content of the Tier 1 or Tier 2 documents.

3.2 *Document Control*

As Mercury Storage and Transfer Program documentation (plans, procedures, or associated checklists) are issued, they will be controlled using the Standard Operating Procedure Program for the Mercury Storage and Transfer Program and the applicable management system document control procedure (e.g., International Organization for Standardization (ISO) 14001 Control of Documents Standard Procedure for environmentally driven documents, the ISO 9001 Control of Documents Standard Procedure for quality driven documents or the Occupational Health and Safety Assessment Series (OHSAS) 18001 Control of Documents Standard Procedure for safety driven documents, as applicable). Because HWAD's Tier 1 documents for the Mercury Storage and Transfer Program are CAPP and environmentally driven, all Tier 1 documents are jointly controlled under the Standard Operating Procedure Program and the ISO 14001 Control of Documents Standard Procedure. On the other hand, HWAD's Tier 2 documents are generally either QA driven or Safety driven. QA driven Tier 2 procedures are jointly controlled under the Standard Operating Procedure Program and the ISO 9001 Control of Documents Standard Procedure; Safety driven Tier 2 procedures are jointly controlled under the Standard Operating Procedure Program and the OHSAS 18001 Control of Documents Standard Procedure.

While use of this integrated system introduces some variability[2] in the appearance of CAPP Tier 2 documents and/or variability in the level of administrative controls applied to Tier 2 documents, the intent of CAPP will be met.

Proposed changes to the Mercury Storage and Transfer Program or its associated carbon dioxide (CO_2) fire suppression system will be subject to management of change review in order to ensure that changes that could affect health or safety are evaluated to minimize risks associated with such changes.

3.3. *SOC Integration of CAPP with International Management Systems*

SOC has three registered (approved) management systems in place at this time: International Organization for Standardization (ISO) 9001 for Quality Management Systems, ISO 14001 for Environmental Management Systems, and Occupational Health and Safety Assessment Series (OHSAS) 18001 (Safety). Each of these management systems contains five core elements. These five elements can be generally compared to specific CAPP Elements that serve similar purposes:

CAPP Element	Management System Core Elements
IV. Standard Operating Procedure	Control of Documents
IX. Verification of Compliance Audit	Internal Audits
I-XIII. All CAPP Elements	Control of Records
VI. Mechanical Integrity	Control of Nonconforming Product

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XIII. Emergency Response and Emergency Action Plans; III. Process Hazard Analysis; VI. Mechanical Integrity	Corrective Action and Preventive Action

Where applicable, these management systems have been integrated into the Mercury Storage and Transfer Program documents (Tier 1 or Tier 2). While specific ISO or OHSAS requirements for these common elements may differ from the parallel CAPP requirements, the core elements still support or enhance the intent of CAPP. If/when these requirements overlap, the most stringent requirement will apply. SOC has implemented these systems to interface as needed to maintain compliance with CAPP requirements. Chapter One, Section 5.5 of the SOC Quality Manual addresses the ISO and OHSAS inter-relationship as well.

3.4 Records/Recordkeeping

CAPP required records include the following. Some must meet CAPP defined time-frames for retention. In some instances, CAPP has mandated a record be kept but has not specified a timeframe for record retention. However, the minimum retention requirement, when not otherwise specified by the CAPP regulations, is five years to support revalidation of the PHA and future Incident Investigations. However, longer record retention schedules may be used.

Notification of CAPP activity (reports of regulatory agencies and annual registration) – correspondence and associated completed forms. Retain for a minimum of five years.

Process Hazard Analysis – Five year update and revalidation, retain for the life of the process.
Training – Names, dates, syllabus (content) and test results or verification of understanding. Retain records for a minimum of five years.

Procedures – Development (employee participation), implementation and document control records. Retain for a minimum of five years.

Management of Change – Review and approval documentation. Retain for a minimum of five years.

Emergency Response – Meeting records documenting the review of the HWAD Emergency Operations Plan by other responders and responding agencies and after incident critiques. Retain for a minimum of five years.

Mechanical Integrity – Inspection, testing, and maintenance records (names, dates, results) for regulated equipment. Retain for a minimum of five years.

Incident Investigation – Five year retention for these reports.
Compliance Validation Audit – Retain two most recent reports (maximum six year retention).

4. HWAD CAPP Training Plan

The CAPP Training Plan for the Mercury Storage and Transfer Program addresses initial and refresher training

and recordkeeping requirements. An overview training module (classroom or web-based) covers the basic content to meet CAPP requirements; whereas the other training modules are based on operating procedures and may be required readings or on the job modules. Trainers/authors for the overview module will be knowledgeable of the CAPP requirements, and trainers/authors for procedure based training will be knowledgeable of the systems the procedures are written to cover. Refer to the CAPP Training Plan for additional details.

5. Facility and Substance Information (Element I)

To comply with NDEP requirements, HWAD notified NDEP of its intent to store mercury at CAPP-regulated levels on January 3, 2008 (Appendix 2). The following excerpts address the NDEP requirements concerning those annual notifications:

NAC 459.95348 Excerpts of General requirements. (NRS 459.3818, 459.3822, 459.3832, 459.3833)

1. The owner or operator shall:
   (a) Complete annually a single registration form covering all processes subject to CAPP;
   (b) Submit the annual registration pursuant to subsection 6 to the Division on or before June 21 of each year; and
   (c) Certify the annual registration pursuant to NAC 459.95337.
2. The registration must reflect the maximum quantity of all highly hazardous substances...on-site between June 1 of the previous year and May 31 of the current year.
3. Except as otherwise provided in this subsection, before starting a new process, the owner or operator shall submit a registration form covering all the processes subject to CAPP, including the new process, at least 90 days before introducing the highly hazardous substance...into the facility. An owner or operator does not need to submit a registration form pursuant to this subsection to include a new process in his registration if the owner or operator has submitted an application for a permit to construct for the new process pursuant to NAC 459.953451.
4. If a facility is or becomes subject to the provisions of subparagraph (2) of paragraph (a) of subsection 1 of NAC 459.95323, the owner or operator shall submit the registration pursuant to subsection 6 not later than 90 days after the provisions of subparagraph (2) of paragraph (a) of subsection 1 of NAC 459.95323 take effect.
5. If the State Environmental Commission amends a threshold quantity or mixture concentration of a substance or adds a new substance to the table of highly hazardous substances set forth in subsection 1 of NAC 459.9533 and a facility has a process that uses the new substance or that uses the substance in an amount that exceeds the amended threshold quantity or mixture of concentration, the owner or operator shall, not later than 90 days after the effective date of the regulation which contains the addition or amendment, submit to the Division registration for the process in accordance with subsection 6.
6. A complete registration consists of:
   (a) Information about the facility as set forth in NAC 459.9535;
   (b) A summary of the accident history in accordance with NAC 459.95354;
   (c) The status of any recommendation of the process hazard analysis developed pursuant to subsection 8 of NAC 459.95414 that was unresolved when the registration for the previous year was submitted;
   (d) Such other information that may be required by the Division; and
   (e) Certification as set forth in NAC 459.95337.

NAC 459.9535 Annual registration: Information concerning facility. (NRS 459.3818, 459.3822, 459.3833) Information about the facility on the annual registration form must include:

1. The name, street, city, county, state, zip code, latitude and longitude of the facility, the method for obtaining the latitude and longitude, and a description of the location that the latitude and longitude represent.
2. The Dun & Bradstreet number for the facility.
3. The name and Dun & Bradstreet number of any parent corporation.
4. The name, telephone number and mailing address of the owner or operator.
5. The name and title of the person with overall responsibility for the implementation of CAPP.
6. The name, title, telephone number during normal business hours and telephone number that is available 24 hours per day of an emergency contact.
7. For each process:
   (a) The name and Chemical Abstracts Services number of each substance.
   (b) The maximum quantity of each substance on-site between June 1 of the previous year and May 31 of the current year. For a new process, the owner or operator shall include in its annual registration form information about the maximum inventory they expect to have on-site through the following May 31.
   (c) The North American Industry Classification System code that is applicable to the process.
8. The identifier assigned by the United States Environmental Protection Agency, if any, to the facility.
9. The number of full-time employees at the facility.
10. Whether the facility is subject to 29 CFR § 1910.119.
11. Whether the facility is subject to 40 CFR Part 355.
12. Whether the facility has an operating permit pursuant to 40 CFR Part 70 and, if applicable, the permit number.
13. The date of the last safety inspection of the facility by a federal, state or local governmental agency and the identity of the inspecting entity.

NAC 459.95354 Annual registration: Accident history of facility. (NRS 459.3818, 459.3822, 459.3833) An annual registration must include an accident history of the facility for the period starting on June 1 of the previous year and ending on May 31 of the current year. The accident history of the facility must:

1. Any unanticipated or unusual event at the facility that resulted in the release, including, without limitation, any accidental releases, of any highly hazardous substance or explosive; and
2. The efforts undertaken by the owner and operator of the facility to assess the reasons and develop a remedy for the release or accidental release of the substance.

The NDEP requires submittal of these CAPP registrations by June 21st of each year. The CAPP Annual Registration is submitted on-line through CAPP Track; however, facilities must print, certify, and mail a paper copy of the completed registration form.

5.1 Facility and Substance Information Implementation and Control

The SOC Environmental Services Manager with the assistance of the DLA Strategic Materials Safety Manager will be responsible for issuing the annual registration (online and paper copy) to cover the Mercury Storage and Transfer Program and for ensuring its accuracy and completeness. The registration package will include

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information on accident history, the latest organizational chart, and any open process hazard analysis recommendations. The registration will also address/petition for confidentiality (see NAC 459.95523) of the HWAD information (or portions of the information) as necessary. Any request for confidentiality will document any prior NDEP acceptance of confidentiality of HWAD information. The registration will be approved and certified by the SOC General Manager and HWAD Commander prior to submittal. The completed registration package (paper copy) will be maintained for a minimum of five years.

5.2 Notification and Annual Registration Records

The completed registration package (paper copy) will be maintained for a minimum of five years. The registration will include a copy of the certified transmittal letter, the NDEP annual registration form and any supporting documents (information on confidentiality, accident history or process hazard analysis recommendations).

6 Contractor Program Requirements

Under NDEP regulations, HWAD must implement a system that ensures subcontractors hired by HWAD in support of the Mercury Storage and Transfer Program will comply with applicable CAPP requirements. Those requirements are identified below. It is the Contracting Office Representative's responsibility to ensure the subcontractor complies with all applicable CAPP requirements. DLA Strategic Materials is an independent government entity operating under the HWAD CAPP Mercury Storage and Transfer Program; contractors hired by DLA Strategic Materials must comply with applicable CAPP requirements.

NAC 459.95435 Duties of owner or operator concerning contractors; duties of contractors. (NRS 459.3818, 459.3833)

1. The owner or operator of a facility with a process that is subject to C.A.P.P. shall:

(a) When selecting a contractor, obtain and evaluate information regarding the safety performance and programs of the contractor;

(b) Inform the contractor of known potential fire, explosion or toxic release hazards related to the work of the contractor and to the process on which he or she is working;

(c) Explain to the contractor the applicable provisions of NAC 459.9544 and 459.95442;

(d) Develop and implement safe work practices consistent with NAC 459.95416; and

(e) Periodically evaluate the performance of the contractor in satisfying the requirements of subsection 2.

2. The contractor shall:

(a) Ensure that each of the contractor's employees who will work on the process is trained in the work practices necessary to perform his or her job safely;

(b) Ensure that each of the contractor's employees who will work on the process is instructed in:

(1) The known potential fire, explosion or toxic release hazards related to his or her job and the process on which he or she is working; and

(2) The applicable provisions of the emergency action plan;

(c) Document that each of the contractor's employees who will work on the process has received and understood the training required pursuant to this subsection;

(d) Prepare a record that contains:

(1) The identity of the employee;

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(2) The date of training; and

(3) The means used to verify that the employee understood the training;

(e) Ensure that each of the contractor's employees who works on the process follows the safety rules of the facility, including, without limitation, the safe work practices required pursuant to NAC 459.95416; and

(f) Advise the owner or operator of any unique hazards presented by or found during the work of an employee.

3. This section:

(a) Applies to contractors who perform maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a process.

(b) Does not apply to contractors who provide incidental services that do not influence process safety, including, without limitation, janitorial work, food and drink services, laundry, delivery or other supply services.

(Added to NAC by Environmental Comm'n by R121-98, eff. 5-27-99; A by R137-04, 2-15-2005)

Appendix 1: List of HWAD CAPP Tier 1 and 2 Documents and Assignments

NDEP Element Number	Tier 1 Document Title	Responsible Manager/ Author	Supporting Tier 2 Document Title	Responsible Manager/Author
NA	Management System and Implementation Plan Chemical Accident Prevention Program (CAPP) for the Hawthorne Army Depot (HWAD) Mercury Storage and Transfer Program	SOC Environmental Manager/ DLA Strategic Materials Safety Manager	All other Tier 2 (see below)	Varies (see below)
			HWAD and ACO & DLA Strategic Materials Organizational Charts	HWAD and ACO & DLA Strategic Materials respectively
I	Facility and Substance Information[3]	SOC Environmental Manager/ DLA Strategic Materials Safety Manager		
II	Process Safety Information Procedure	SOC Environmental Manager/ DLA Strategic Materials Safety Manager	Process Safety Information for Mercury Transfer Program	DLA Strategic Materials Safety Manager

III	Process Hazard Analysis Procedure	SOC Environmental Manager/ DLA Strategic Materials Safety Manager SOC Safety	Process Hazard Analysis for Mercury Transfer Program 2010 Supplements to PHA Prior PHA documents for Hg and CO_2	DLA Strategic Materials Safety Manager SOC Environmental Manager SOC Safety
IV	Standard Operating Procedure Program[4]	SOC Environmental Manager	All CAPP Tier 2 Mobile Mercury Transfer System Operating Procedures	DLA Strategic Materials Safety Manager
			Hot Work Permit Chapter 10, Quality Plan (SOC.OHS.SP.0002)	DLA Strategic Materials Safety Manager SOC Safety SOC FES
			Lock out/Tag out Procedures, Chapter 21, (SOC.OHS.SP.0002)	DLA Strategic Materials Safety Manager SOC Safety
V	CAPP Training Plan for the HWAD Mercury Storage and Transfer Program	SOC Environmental Services Manager	Training 2014-MMTS-19 HWAD Master Training Matrix- needs analysis (DOC.QP.HRD.0005)	DLA Strategic Materials Safety Manager SOC Human Resources SOC Environmental Services
			See all CAPP Tier 2 procedures	Varies
			HWAD Master Training Plan DOC.QP.HRD.0005)	SOC HR
VI	Mechanical Integrity Procedure	SOC Environmental Manager with DLA Authorship	Electrician Maintenance Plan (BOP.IOP.EMB.1302)	SOC Electricians

		of MMTS specific procedures	Electrician Technician Mercury Storage (BOP.IOP.EMB.1303)	SOC Electronics
			MAXIMO	Facilities Management (DLA Strategic Materials, Manager
			Refrigeration & Maintenance Plan (BOP.IOP.EMB.1300)	SOC EMD
			Testing, Inspection and Maintenance of CO_2 Fire Suppression System (DPD.IOP.FES.0015)	SOC FES
			Start up/ Shut down and CO_2 Tank Fill/ Refill Procedure (QP.BOP.EMD.1301)	SOC EMD
			Mercury Monitoring & Response Internal Operating Procedure (DPD.IOP.FES.0019)	SOC FES & DLA Strategic Materials Manager
			CO_2 Line Breaking Procedure for Mercury Storage Warehouses (QP.BOP.001)	SOC Director BOP
			110 HG Storage Buildings with CO_2 Suppression Response/ Activation Assistance (DPD.IOP.FES.0017)	SOC FES
			Mercury Storage Site & Stockpile Inspection (SOC.QP.QAD.0002)	SOC FES, DLA Strategic Materials Manager

			Fork Lift Operator Instructions and Preventive Maintenance in Elemental Mercury Storage and Transfer Program	SOC M&L Storage Planning
			See all CAPP Tier 2 procedures	Varies
VII	Management of Change Standard Procedure	Soc Environmental Manager	All CAPP Tier 2 Mobile Mercury Transfer System Operating Procedures	DLA Strategic Materials Safety Manager
VIII	Pre-Startup Safety Review Procedure	SOC Environmental Manager DLA Strategic Materials Safety Manager	All CAPP Tier 2 Mercury Storage and Transfer Program Operating Procedures	SOC Environmental Manager DLA Strategic Materials Safety Manager
IX	Compliance Audit Program	DLA Strategic Materials Safety Manager to technically Lead with SOC environmental Manager, SOC General Manager and ACO Environmental Protection to support and QA		
X	Incident Investigation	SOC FES	All CAPP Tier 2	SOC FES

	Standard Procedure		Mercury Storage and Transfer Program Operating Procedures	SOC Safety DLA Strategic Materials Safety Manager
XI	Employee Participation Procedure	DLA Strategic Materials Safety Manager SOC Environmental Services	All CAPP Tier 2 Mercury Storage and Transfer Program Operating Procedures	Varies
XII	Contractor Program[4]	DLA Strategic Materials Safety Manager SOC Contracts & Procurement SOC Safety	Hazardous Materials and RCRA Contingency Plan	SOC Environmental Services
XIIIA & B	Emergency Operations Plan (DZHC.HWAD.FES.0005), Emergency Operations Plan Annex B, Disaster Preparedness and Emergency Operations Plan Annex C, Emergency Response	SOC FES		

Appendix 2. CAPP Activity Reporting Form – part of facility and substance information

Click on the following:
CAPP 2007 Registration Form
CAPP 2009 Registration Form
CAPP 2010 Registration Form
CAPP 2011 Registration Form
CAPP 2012 Registration Form
HWAD Organizational Chart - note: this Org Chart is not linked to the active & changing Org Chart in 14001
SOC Organization Chart - note: this Org Chart is not linked to the active & changing Org Chart in 14001

[1] Oak Ridge National Laboratory (ORNL) UT-Battelle, LLC and Tetra Tech, Inc. - provided technical support in CAPP development based on mercury, toxicology and hazard analysis expertise.
[2] Examples of variability include: signature pages may differ; procedure format/content may differ, administrative controls on the use of printed copies of procedures may differ, and the use of document numbers verses dating systems may differ.
[3] Included in Management System and Implementation Plan above.
[4] This procedure applies to all the Tier 1 and Tier 2 plans and procedures