

# Audit Summary

K2 Pure Solutions  
Pittsburg, California

## Accident History:

The facility has not had an incident related to the regulated CalARP materials in the last five years.

## Introduction

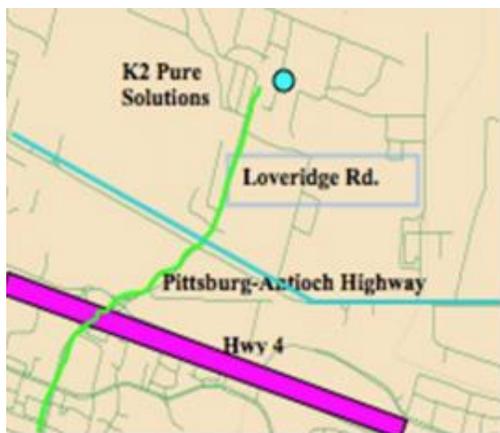
Contra Costa Hazardous Materials Programs (CCHMP) conducted a comprehensive audit/inspection of the policies, and procedures developed by K2 Pure Solutions, Inc. (K2 Pure) located at 950 Loveridge Road, Pittsburg. This audit, conducted in the fall of 2015, was performed to assess compliance with the California Accidental Release Prevention (CalARP) Program. The CalARP program requires the development of prevention programs such as maintenance, operating procedures, contractor safety, personnel training, incident investigations, and understanding hazards at the plant. The inspection also examines the management systems in place to implement these programs and the plant's emergency response program to make sure that the plant is prepared to respond to an emergency involving a hazardous chemical.

During a comprehensive CalARP audit for a facility like K2 Pure, CCHMP reviews individual safety programs through answering up to 235 questions. The CCHMP 2015 CalARP audit at K2 Pure resulted in 25 corrective actions for K2 Pure to implement, and roughly 39 other items that are not required, but may assist in accident prevention.

*Based on our audit/inspection, many of the prevention programs generally meet the regulatory requirements. Select prevention programs are identified to need improvement in order to meet the regulatory requirements. Identified below are some notable issues found, both good and bad.*

## Notable Items:

- **Changes in Process and Equipment:** An effective system to track and manage changes to a process, for both permanent and temporary changes, needs to be in place. The system needs to document and address necessary training for personnel and modifications to relevant procedures. A process to verify that changes are being managed, independent of the MOC process, needs to be developed.
- **Emergency Response:** The facility has policies with regards to inspecting, testing, and maintaining emergency response equipment, but requires implementation.
- **Maintenance:** The majority of maintenance procedures require finalization and implementation; piping and instrumentation inspection/testing need to be conducted and documented in a timely manner.
- **Process/Equipment Safety Information:** Information related to maximum intended inventory and safety systems need to be updated accordingly.
- **Hazard Analysis:** The analysis conducted did not include elements to address source siting and human factors, hazard analysis recommendations need to be accurately documented



## Additional Information

To review the complete safety audit report, visit the Pittsburg Public Library at 80 Power Ave. Pittsburg, CA, 94565, or call 925-335-3200 for an appointment to view the report at CCHMP's office, which is located at 4585 Pacheco Blvd., Suite 100, Martinez, CA, 94553.

For more information, questions, or comments regarding this facility or audit, please send an email to [ARPTeam@hsd.cccounty.us](mailto:ARPTeam@hsd.cccounty.us)

