

# Audit Summary

## CCWD City of Brentwood WTP Oakley, California

### Accident History:

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

## Introduction

Contra Costa Health Services Hazardous Materials Programs (CCHSHMP) conducted a comprehensive audit/inspection of the policies, and procedures developed by CCWD City of Brentwood WTP (COBWTP) located at 3760 Neroly Road in Oakley. This audit, conducted in the summer of 2018, 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 the CalARP audit for a facility like COBWTP, CCHSHMP reviews individual safety programs through answering up to 110 questions. The CCHSHMP 2018 CalARP audit at COBWTP resulted in 6 corrective actions for COBWTP to implement, and 7 other suggestions that are not required by regulations but may assist in improving accident prevention.

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

## Notable Items:

- **Self-Audit:** At the time of the audit, the two most recent compliance audits were dated 2012 and 2015. There was no compliance audit conducted to meet the 3-year audit requirement and an action item was issued to complete a compliance audit as soon as possible.
- **Maintenance:** Overall, the preventive maintenance program associated with the ammonia system is well organized. However, consistent documentation of maintenance activities is an area of improvement to ensure maintenance information is complete.
- **Hazard Review:** At the time of the audit, COBWTP's most recent hazard review was completed in 2013 and was reviewed in the previous CalARP audit. A five-year revalidation of the hazard review was not completed on time and an action item was issued to complete the revalidation as soon as possible.
- **Management:** Per interview with management personnel at COBWTP, there has been significant turnover in personnel related to the CalARP program. As such, several prevention program element requirements (specifically the compliance audit and hazard review) were overlooked during the change in personnel.



## Additional Information

To review the complete safety audit report, visit the Oakley Library at 1050 Neroly Road, Oakley, CA 94561 or call 925-335-3200 for an appointment to view the report at CCHMP's offices

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)

