



# CHLOREP® Contractor Verification U.S. Procedure

Updated: 03/08/18

## **Objectives of the Verification Visit**

Contractor verification visits are a way for the Chlorine Institute (CI or the Institute) and its members to assess the quality of emergency response contractors that respond to chlorine emergencies. The form and structure of these visits are guided by the requirements outlined in CI's CHLOREP Emergency Response Contractor Verification Program Description, as well as the information provided by the contractor in the submitted CHLOREP Emergency Response Contractor Verification Report form.

## **Before the Verification Visit**

**Emergency Response Contractor:** The primary contact person will be asked for an ideal general timeframe to conduct the verification visit. He/She will be provided a blank verification form and their previous verification form (if applicable) at least 4-6 weeks prior to the scheduled verification visit. He/She will be asked to fill in all requested information and provide all requested documentation noted in the form. Submission of the completed package will be requested at least 2 weeks prior to the visit. A copy of the form will be sent to the verification team once received.

**Verification Team:** A verification team will be assembled, consisting of one CI member chlorine producer, one CI member chlorine packager and one Class I railroad representative. CI staff will confirm a date (one day) for the visit based on the contractor's and verification team's availability during the timeframe provided by the contractor. All team members should be present during the visit. A conference call will be scheduled with the team prior to the visit to review the pre-filled paperwork, the program requirements and general agenda/approach for the day.

## **During the Verification Visit**

The verification team has the option to split into groups to complete the verification or the entire group will review all portions of the verification together during the visit. If the team decides to split up, one option is to divide into three groups (Personnel, Equipment, and Incident Response) and verify each item in their assigned section. All other sections would be reviewed as a group. Suggested assignments shown below.

Verification Paperwork Section		Party Responsible for Verification
1	Company Overview	Entire Verification Team
2	Safety Performance, Insurance, and Security	Entire Verification Team
3	Company Capabilities and Sub-Contractor Arrangements	Entire Verification Team
4	Employees, Training, and Medical Surveillance	Personnel Group
5	Transfer Procedures	Equipment Group
6	Emergency Response Experience	Incident Response Group
7	Emergency Response Equipment and Maintenance	Equipment Group
8	Supplemental Information	Entire Verification Team

After each team has completed their verification, the verification team (excluding employees of the company being verified) will discuss all observations, including any gaps, and develop a list of recommended actions to share with the contractor. The verification team and contractor may work together on a corrective action plan, if needed. Attached is a sample agenda for the verification visit that provides an example of how the day could be structured.

### **After the Verification Visit**

CI staff will finalize the verification report to reflect the outcome of the visit, including attaching any additional supporting documents provided during the visit. A draft report and approval letter will be sent to the verification team via email for final review (one week response deadline). Based on their review, the team will determine if any clarification is needed from the contractor or if there are any issues that need to be brought to the EPIT's attention. Otherwise, if the team finds the verification report acceptable, the contractor will be approved. A conference call for this review and discussion will be scheduled only as needed. During this review, CI staff will confirm if the contractor is current with their CI membership dues.

If approved and membership dues have been paid, CI staff will send the contractor the final verification package with a letter stating approval for continued participation in the CHLOREP Contractor Verification Program. If membership dues have not been paid, CI staff will request the dues be paid prior to issuing the approval letter. CI staff will notify CI members of the contractor's verification status and maintain a copy of the documentation on CI's internal electronic storage system. Verification document will be provided to CI members upon request. If recommended actions are identified, the contractor must report in their next annual update the corrective actions that were taken in response to the recommendations.

If issues are identified during the review, CI staff will notify CI's Emergency Preparedness Issue Team (EPIT) of the identified issues. The EPIT will review the issues and develop recommended actions. A warning letter will be sent to the contractor identifying the issues and requesting a corrective action plan, with a defined timeline to resolve the issues, be submitted to CI within



three months. CI staff will follow-up with the contractor and the EPIT will make decisions accordingly based on the contractor's progress. The verification team will be available to work collaboratively with the contractor to develop the corrective-action plan based on findings.

### **Annual Updates**

All verified contractors will be asked to provide an update on any significant changes during the alternative years when a verification visit is not conducted. Level 3 contractors will complete and submit the full verification report in the alternate years. Level 2 contractors will complete and submit an annual update form to identify changes/updates to contact information, team members, training, or response capabilities. If CI staff notices significant changes that could cause concern, the staff will share the update with the EPIT to discuss any concerns and possible need to conduct a more immediate on-site visit.

### **New Applicants**

When an emergency response contractor contacts CI staff with interest in being added to the list of CHLOREP verified contractors, is not a CI member and has never been part of the program before, they must first go through the CI membership approval process. CI staff will provide a response explaining the process and copy CI's Manager of Member Services so he/she may follow-up with the membership application package. Once the contractor submits the membership application, it will be considered by the CI Board of Directors for approval through an email ballot with a specified response deadline (overall process typically takes 4-6 weeks). If approved, the approval will be temporary pending a successful verification.

For U.S. contractors, the CHLOREP verification visit will be coordinated soon after and follow the process described above.

If the contractor is approved for verification, final CI membership approval will also be granted. CI staff will notify the Manager of Member Services so he/she may send the final membership package to the contractor and request membership dues payment. CI staff will also follow the process to send the contractor the approved CHLOREP verification package.

# Sample Verification Visit Agenda

8:00am	<p><b><u>Introductions &amp; Initial Verification</u></b></p> <p>Entire verification team meets on-site at contractor’s location. The day’s schedule is reviewed and the Company Overview, Safety Performance, Insurance and Security sections of the reporting paperwork are verified.</p>
8:30am	<p><b><u>Verification Activities</u></b></p> <p>The team decides if it would like to break-up into three pre-determined sub-groups (Personnel, Equipment, and Incident Response) or have the entire team look at every aspect of the verification together. Contractor’s lead point of contact escorts the team to relevant rooms/areas within their facility to begin verification work.</p>
10:30am	<p><b><u>Verification Team Check-In</u></b></p> <p>If the team split into sub-groups, they will meet (without the contractor) to discuss progress on the verification activities. If one group has too much to cover or another group has too little, the three sub-teams are changed as necessary to complete the verification on time.</p>
11:00am	<p><b>Lunch On-Site</b></p>
11:30am	<p><b><u>Verification Activities Continue</u></b></p> <p>The team or sub-groups continue verification activities.</p>
1:30pm	<p><b><u>Verification Team Discusses Findings</u></b></p> <p>The verification team (without contractor) discusses observations, discrepancies and agrees on points of interest in preparation for the final discussion with the contractor. The team determines if the contractor should be list as a CHLOREP verified contractor, given a warning, or be asked to leave the program.</p>
2:30pm	<p><b><u>Verification Team and Contractor Discusses Findings</u></b></p> <p>The verification team and contractor discuss discrepancies, recommendations and create a plan of resolution.</p>
3:30pm	<p><b>Depart from Site</b></p>