

# RETA Chapter Meeting Schedule

## ALABAMA

BIRMINGHAM  
2<sup>nd</sup> Thursday

## ARIZONA

PHOENIX  
4<sup>th</sup> Thursday; 6 pm  
SOUTHWEST  
2<sup>nd</sup> Thursday; 6 pm

## ARKANSAS

NORTHWEST ARKANSAS  
2<sup>nd</sup> Thursday; 6 pm

## CALIFORNIA

BAY AREA  
3<sup>rd</sup> Thursday; bi-monthly;  
6:30 pm  
CALIFORNIA CHAPTER #2  
3<sup>rd</sup> Wednesday; 6 pm  
No meeting in December  
CENTRAL VALLEY  
3<sup>rd</sup> Thursday; 6:30 pm  
INLAND EMPIRE  
3<sup>rd</sup> Tuesday; 6 pm  
KERN  
Last Wednesday; 7 pm  
MONTEREY BAY  
3<sup>rd</sup> Wednesday; 6 pm  
SAN JOAQUIN  
2<sup>nd</sup> Tuesday; 6 pm  
SANTA MARIA  
Not scheduled

## DELAWARE

DELMARVA  
3<sup>rd</sup> Tuesday; 6:30 pm

## FLORIDA

CENTRAL FLORIDA  
3<sup>rd</sup> Thursday; 6:30 pm  
NORTH FLORIDA  
2<sup>nd</sup> Thursday; 6:30 pm  
No meeting in July or October  
SOUTH FLORIDA  
2<sup>nd</sup> Thursday

## GEORGIA

ATLANTA  
2<sup>nd</sup> Tuesday; 6:30 pm  
No meeting in June or July

## IDAHO

TREASURE VALLEY  
3<sup>rd</sup> Tuesday

## ILLINOIS

CHICAGO  
2<sup>nd</sup> Wednesday; 5:30 pm

## INDIANA

FT. WAYNE  
2<sup>nd</sup> Thursday; 5:30 pm

## KANSAS

GOLDEN PLAINS  
To be determined

## MINNESOTA

NORTHERN PLAINS  
3<sup>rd</sup> Thursday; 6 pm

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# PSM/RMP Compliance



## MAXIMUM INTENDED INVENTORY

— Lee Pyle, SCS Tracer Environmental

When preparing your Process Safety Management program (or at this point maintaining your program), please spend a few minutes pondering your *maximum intended inventory*.

Regulated under 29 CFR 1910.119, the Process Safety Management program standard has 14 program elements – one of those elements is Process Safety Information (29 CFR 1910.119 (d)). Within the Process Safety Information (PSI) requirement are several additional requirements of which a facility must review and show compliance. Some of these include the following:

- 1) Information pertaining to the hazards of the regulated material (ammonia).
- 2) Information concerning the technology of the process.
- 3) Information pertaining to the equipment in the regulated process.

Focusing on *information concerning the technology of the process*, specifically item 1910.119(d)(2)(C), would be providing the *maximum intended inventory*. For new installations, this can be a straightforward task –

- Obtain the engineering calculations from the design engineer, and
- Obtain the ammonia delivery vendor receipt for your PSM records.

But should you be reporting the actual ammonia charge or the maximum amount your system could hold if it were full? Most facilities use the amount of ammonia calculated to properly operate the system as their *maximum intended inventory*.

This can be a slightly more challenging task for those with an existing system. If you can't locate the original charge data (engineering calculations, delivery receipt, signage on the door, etc.) a new calculation will need to be completed. This documentation should be maintained with your Process Safety Information report. Include a date and any assumptions along with the calculation.

So we've listed our maximum intended inventory where it is required, in the Process Safety Information report - but is that the only place it is referenced? Unfortunately not! Check it out:

- Process Safety Information – Maximum Intended Inventory
- EPA RMP Submit Item 1.17 – Maximum Intended Inventory
- Hazard Assessment Worst Case Release – Total Charge or Largest Vessel?
- EPA Tier II submittal
- Department of Homeland Security – Top Screen Survey

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# MAXIMUM INTENDED INVENTORY

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Be sure all of your reported *maximum intended inventory* numbers match up.

Ongoing maintenance – how do we continue to defend our *maximum intended inventory* when we get a delivery of ammonia? Some facilities receive deliveries of ammonia annually (some more, some less).

One hurdle we have in this industry is that many regulators really don't understand how your system operates. By not completely understanding how our systems operate, regulators tend to put us (operators) on the defensive right from the very start of the audit. It's not intentional, it's just the nature of a regulatory inspection – they come in, ask questions that we think are obvious and our conclusion is that we think they are trying to trick us!

So, what's the answer to the million dollar question of how not to get put on the defensive during a regulatory inspection? Be prepared. By this, yes, I mean documentation.

One method to defending your *maximum intended inventory* would be to maintain an ammonia delivery log. The delivery log can include a variety of information including but not limited to:

- Delivery Date
- Ammonia Supplier
- Operator Name
- Safety Checklist
  - o Documentation regarding refrigerant grade.
  - o Location of nearest eyewash/safety shower.
  - o Location of truck safeties.
- Initial Ammonia Level
- Final Ammonia Level
- Amount of Ammonia Delivered
- Explanation/Reason for Delivery\*
- Sign-Off Upon Completion (Driver/Operator)

*\*If adding ammonia due to fugitive losses or accidental release: include the reason for the loss, amount lost, who calculated the loss, and refer to the specific incident. If adding ammonia due to system expansion: indicate the contractor assisting with the expansion and the calculated amount to be added.*

Included in the *Explanation/Reason for Delivery* could be a Yes/No question: Does this addition change the *maximum intended inventory*? If yes, then you will need to reference the aforementioned list to see what other documentation needs to be updated. If no, you now have defensible documentation in your PSM program when the inspector asks – why did you purchase 2,000 pounds of ammonia last year.

Thanks to **Steven Shaub** for calling with a compliance question which sparked the idea for this article.

## RETA Chapter Meeting Schedule

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### N/S CAROLINA

CAROLINAS  
1<sup>st</sup> Thursday; time varies  
No meeting in June, July or August  
GREATER RALEIGH (NC)  
No meeting in June, July or August

### NEBRASKA

OMAHA  
To be determined

### NEVADA

SOUTHERN NEVADA  
2<sup>nd</sup> Monday; 5 pm

### NEW YORK

WESTERN NEW YORK  
3<sup>rd</sup> Tuesday; 6 pm

### OREGON

WILL H. KNOX  
2<sup>nd</sup> Tuesday

### OKLAHOMA

TULSA  
2<sup>nd</sup> Tuesday; 6:30 pm

### PENNSYLVANIA

NORTHEASTERN (NEPA)  
4<sup>th</sup> Thursday; 6 pm  
SOUTHEASTERN (SEPA)  
2<sup>nd</sup> Tuesday; 6:30 pm  
No meeting in June, July or August  
PHILADELPHIA  
3<sup>rd</sup> Thursday; 6 pm  
No meeting in June, July or August

### TEXAS

HIGH PLAINS  
3<sup>rd</sup> Tuesday; 7 pm  
DALLAS/FT. WORTH  
3<sup>rd</sup> Thursday; 7 pm  
HOUSTON  
4<sup>th</sup> Thursday; 6:30 pm  
No meeting in July, November or December

### VIRGINIA

OLD DOMINION  
To be determined

### WASHINGTON

CONNELL  
2<sup>nd</sup> Thursday; 6 pm  
TRI CITIES  
2<sup>nd</sup> Thursday; 6 pm  
PUGET SOUND  
2<sup>nd</sup> Wednesday; 6 pm

### WISCONSIN

MADISON  
2<sup>nd</sup> Wednesday; 6 pm  
No meeting in June, July or August  
MILWAUKEE  
2<sup>nd</sup> Thursday; 6 pm  
No meeting in June, July or August