

RETA Chapter Meeting Schedule

ALABAMA

BIRMINGHAM
2nd Thursday

ARIZONA

PHOENIX
4th Thursday; 6 pm
SOUTHWEST
2nd Thursday; 6 pm

ARKANSAS

NORTHWEST ARKANSAS
2nd Thursday; 6 pm

CALIFORNIA

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

DELAWARE

DELMARVA
3rd Tuesday; 6:30 pm

FLORIDA

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

GEORGIA

ATLANTA
2nd Tuesday; 6:30 pm
No meeting in June or July

IDAHO

TREASURE VALLEY
3rd Tuesday

ILLINOIS

CHICAGO
2nd Wednesday; 5:30 pm

INDIANA

FT. WAYNE
2nd Thursday; 5:30 pm

KANSAS

GOLDEN PLAINS
To be determined

MINNESOTA

NORTHERN PLAINS
3rd 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
1st 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
2nd Monday; 5 pm

NEW YORK

WESTERN NEW YORK
3rd Tuesday; 6 pm

OREGON

WILL H. KNOX
2nd Tuesday

OKLAHOMA

TULSA
2nd Tuesday; 6:30 pm

PENNSYLVANIA

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

TEXAS

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

VIRGINIA

OLD DOMINION
To be determined

WASHINGTON

CONNELL
2nd Thursday; 6 pm
TRI CITIES
2nd Thursday; 6 pm
PUGET SOUND
2nd Wednesday; 6 pm

WISCONSIN

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