

Presentation



- How to Develop, Use, and Apply System Entry/Line Break/SOP's During Component Repair.
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In English



What needs to be completed prior to,
during, and at the completion of
a Task that requires opening up a
hazardous chemical process for repair or
maintenance.

Our Three Goals for this Talk



- 1. To distinguish between a System SOP and a line break Task.
- 2. To discuss what the procedure for a line break Task may involve.
- 3. To simulate a line break Task

What to and what not to do!



S.O.P.'S and Line Break or
System Entry - So Who's Idea
Was This Anyway?

In the Beginning



- PSM

- My simple summary statement of the entire PSM regulation.....To Minimize the potential for any uncontrolled or unwanted hazardous chemical release, thereby minimizing the risk to employees and the public.

29 CFR 1910-119(f) CCR Title 19 Section
2760.3 Title 8 5189(f)
Standard Operating Procedures

- Federal - OSHA
- State - California Emergency Management Agency - enforced through CUPA under CalARP
- Dates back to military operations
- Internet search of term "SOP" in 2002 nets 334,537 hits. In 2012 search has 93,100,000 hits yes, that's 93 million
- OSHA cites heavily in this area
- Tied to the next regulation in both codes is "training"

So, What's an SOP?

Dictionary Definition -

Uniformly followed procedure: a procedure that is usually followed when carrying out a particular operation or dealing with a particular situation.



What's Required in the Training Component?



- Anyone not certified and employed in their current position on June 21, 1999, working on or around the ammonia refrigeration system
- Initial training
- Refresher training - includes those in place 6/21/99
- Operating procedures, if you don't have them; your probably not training on them
- Certification of training

Regulators Definition

Written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address certain other conditions



Should a Procedure Be Written for Every Situation That Might Arise?

- Compressors/condensers
- Pressure vessels & piping
- Purgers/pumps/chillers
- Valves - relief, control, S/O
Expansion, regulating
- Alarm systems
- Filter systems



No! Impossible!!!!

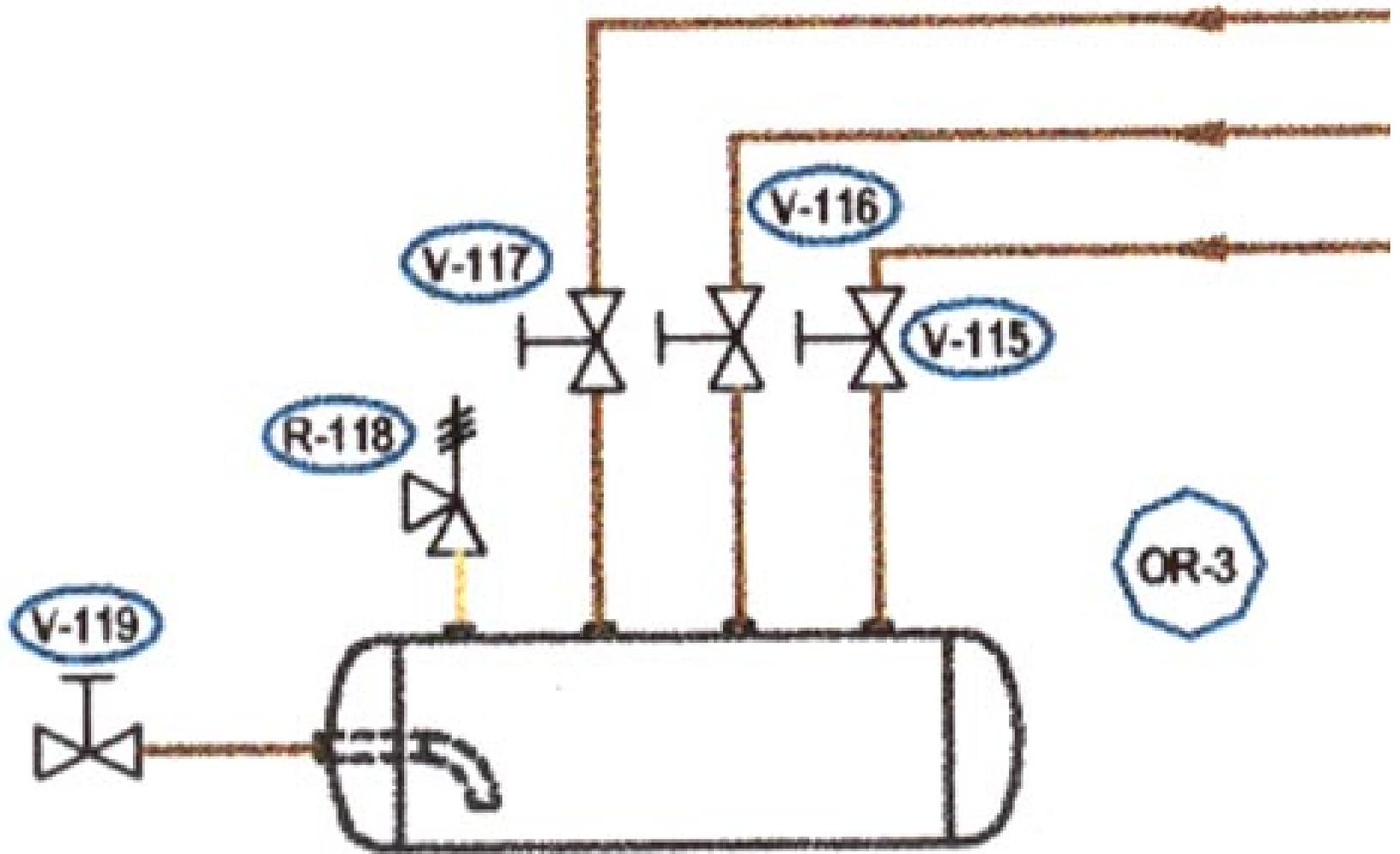


We use line break or system entry and write the steps out prior to performing a maintenance task or repair.

Knowing the Priorities



- During what task do most accidents involving NH₃ take place?
- What would be second?
- Common sense
- Think about it!
- Don't waste time and paper!
- Make something that you will use



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Line Break Task Steps



1. ID specific Task.
2. Get "In House" Permit.
3. Fill out and review permit with necessary plant personnel, including the written steps to perform this specific task.

Suggestions for Written Steps



-ID Proper PPE

(goggles, gloves APR, etc.)

-ID necessary Tools,

(fans, hoses, water, etc., etc.)

-Notify others Task is being done

Suggestions for Written Steps



- Zone off area

- Communicate during procedure

- Have a second (or third) helper on site during entire task.

Questions & Answers



Thank You for
being here!

