

This section is intended to remind handlers of Anhydrous Ammonia that new regulations can require changes in the firm's Risk Management Programs. Once the new ANSI Standard is published by the Compressed Gas Association, OSHA and EPA have general duty clauses in place that essentially require the handlers of Anhydrous Ammonia to comply with the most current standard that regulates the type of operation the firm has.

What are possible effects on RMPs due to new ANSI Standards?

If there has ever been a repair to the storage tank or nurse tanks (if nurse tank wall is penetrated) you must have documentation that it was done by a R-certified welder and inspected by an authorized inspection agency.

If a storage tank is put into service it must have a fully legible data plate, a ASME data report, (build sheet), or be tested according to National Board Inspection Code, NBIC. This is still unresolved in the proposed new standard. If the storage tank is being used now and has no data plate or build sheet it will be taken out of service in 2030.

Written standard operating procedures (SOPs) are already required for a Risk Management Program. However details in operation should not be overlooked by using "generic" formats. The SOPs should be readily available upon inspection.

Note that according to the new standard, once adopted, you will no longer have to have 2 full face respirators and canisters if you comply according to an OSHA 1910.38, Emergency Action Plan. However according to OSHA 1910.111 you are required to have them. You cannot use them unless you comply according to OSHA 1910.134, (fit testing etc.) If you have the face mask on hand be prepared to state why.

The location of a new site must be 100 ft. from the railway, (same as 1999 standard). The distances chart has been cleaned up and hopefully easier to read. This should not affect your RMP unless it is a new site.

Piers, or saddles, should extend over at least one third of the circumference of the shell. The word shall has been changed to should. **Caution**, if the original plans for the site show the piers at 1/3, or the storage tank requires piers covering 1/3 of the tank, the piers must be constructed as such.

Pipe testing; after assembly, piping shall be tested and proved to be free of leaks at a pressure specified by ASME B-31.3. This covers not only new assembly but if repairs or replacement is done to the piping it must be tested. This means hydrostatic valve, pump replacement, or flex connection replacement calls for testing. Documentation is the only way to prove testing was done.

Underground piping shall be evaluated at a minimum of every 5 years to ensure leak tightness. Documentation.

The new standard does not require moving the emergency shut off valve so that it is between the tank and the pump. Iowa will amend this section, requiring an emergency shut off valve as close to the opening of the tank as possible. It is unsure if any emergency shut offs will still be required after the pump as they have been.

In correlation with the last statement, bulkheads are required to assure proper breakaway where the connections, (transport or mobile container), are made. Not a new requirement but it is often ignored.

Shut off valves on storage tank openings, (meaning both liquid and vapor), shall be closed and protected by suitable means against tampering when installation is unattended. Examples of suitable means could include valve locks, remote surveillance, security systems, fencing, lighting motion detectors, alarms, or chemical additives that render anhydrous

ammonia unusable or undesirable for illicit use. One means of protection is usually not adequate and multiple means of protection may be needed.

A legible sign shall be displayed on the premises at which a storage system is located, so as to be readily visible to emergency personnel, with lettering not less than 2 inches in height, stating the following:

- the phrase "EMERGENCY INFORMATION"
- the name of the facility
- the name or title of at least 2 responsible persons
- the area code and telephone numbers of each person listed, and
- the phrase "the 911 address is", and the appropriate 911 address.

RMP maintenance requires recording keeping and inspections documentation. The new standards state that if a nurse tank does not have a legible data plate then it must be certified according to DOT regulation. Therefore document all nurse tank information and have it available even if the data plate is legible.

The General Duty Clause requires that the facilities and the RMP be based on the most current standards. If Iowa is slow in adopting the new ANSI Standards it does not mean that the firm does not have to comply with the most current standard.

The hazard review as well as compliance audit will have to be updated to reflect any change that the new ANSI Standard brings.

Other changes that may be reason to update your RMP

If you are a farmer storing over 10,000 lbs. of Anhydrous Ammonia that is for your own use you are exempt from creating a Risk Management Plan. If you are a corporation or partnership, you must have a RMP.

Any change in the piping, valves, or plumbing that changes your process or operating procedure may not require a change in your submission but does call for updating your Risk Management Program.

You must revise and update your RMP every 5 years.

If the quantity of NH_3 you store goes over the threshold of 10,000lbs. Once you reach the threshold you must have a RMP submitted.

If the process has changed. Within 6 months of a change that requires a revised hazard review.

Within 6 months of a change that requires a revised offsite consequence analysis. If the distance to endpoint increases or decreases by a factor of 2 or more.

The RMP for the site must be de-registered within 6 months if the site is no longer subject to having a RMP.

A correction to your RMP submission is required

If an accidental release from a covered process results in death, injury, or significant injury on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage it must be included in the five-year accident history.

A correction to the RMP must be made within one month of any change in the emergency contact information.

If there is any question on the requirements of a RMP you may refer to 40 CFR 68.