

## Process Safety Management of Highly Hazardous & Explosive Chemicals



**Mechanical Integrity**  
**What Does it Actually Mean?**

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**Remember...**

**Maintain System Integrity**  
**Protect the People**

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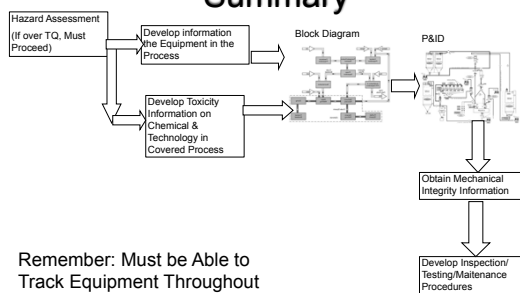
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## The Mechanical Integrity Process Summary



Remember: Must be Able to  
Track Equipment Throughout  
the Entire Program

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## Why Mechanical Integrity?

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### Why Follow Mechanical Integrity Requirements:

Current OSHA NEP Inspection Results - Citations Issues

- 100 Citations - Operating Procedures
- **94 Citations - Mechanical Integrity**
- 86 Citations - Process Safety Information
- 40 Citations - Management of Change

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### Bhopal gas leak (India), 1984



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## Bhopal gas leak (India), 1984

The Bhopal disaster is considered **the worst disaster** in modern history.

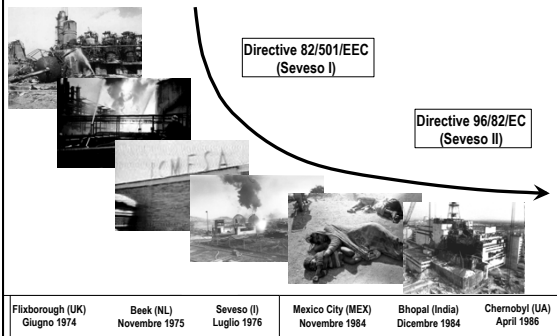
On the night of December 2, 1984, at the **Union Carbide Pesticide Plant** in Bhopal, water entered a tank containing 42 tons of methyl isocyanate (MIC) causing a **leak of gas** and other chemicals.

MIC is an hazardous chemical element, highly reactive, in particular with water.

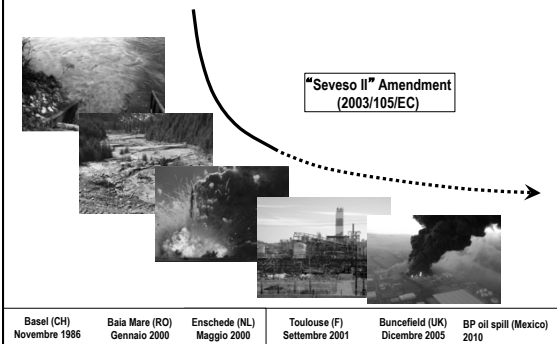
A **gas cloud** was formed, and since it was denser than the surrounding air. It stayed close to the ground, causing the injuries of hundreds of thousands of people.

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## World Wide Accidents



## World Wide Accidents



## Mechanical Integrity

### 1910.119(j)

**Application.** Paragraphs (j)(2) through (j)(6) of this section apply to the following process equipment:

Pressure vessels and storage tanks, Piping systems (including piping components such as valves), Relief and vent systems and devices, Emergency shutdown systems, Controls (including monitoring devices and sensors, alarms, and interlocks) and pumps

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## Mechanical Integrity

### 1910.119(j)

**Application.** Paragraphs (j)(2) through (j)(6) of this section apply to the following process equipment: Pressure vessels and storage tanks, Piping systems (including piping components such as valves), Relief and vent systems and devices, Emergency shutdown systems, Controls (including monitoring devices and sensors, alarms, and interlocks) and pumps

**Written procedures.** The employer shall establish and implement written procedures to maintain the on-going integrity of process equipment.

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## Mechanical Integrity

### 1910.119(j)

**Inspections:** Inspections and tests shall be performed on process equipment. Inspection and testing procedures shall follow recognized and generally accepted good engineering practices.

**Quality Assurance:** In the construction of new plants and equipment, the employer shall assure that equipment as it is fabricated is suitable for the process application for which they will be used. Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.

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## Mechanical Integrity

Equipment information should be obtained including the following:

- Piping system components include any mechanical device that is installed in-line in the piping system and is exposed to PSM-covered materials inside the piping e.g., filters, strainers, flanges, gasket materials, valves of all kinds and mechanical portions of instrumentation.
- Pressure vessels that are not registered vessels and are operated at less than 15 psig should also be included in the MI program if they contain PSM-covered materials.
- Heat exchangers are either pressure vessels or components in a piping system and therefore should be part of the MI program if they cool or heat PSM-covered materials.
- Relief and vents systems and devices include all components that are used to control pressure e.g., relief valves, rupture disks, conservation vents, vent systems, vacuum breakers and flares.

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## Mechanical Integrity

- Controls also include mechanical systems or devices that are intended to terminate or regulate exothermic reactions, pressure transients or other types of process safety scenarios, or to mitigate the results of such a scenario, e.g., a water curtain or quench system. Controls might also include local instrumentation to help operators handle abnormal conditions. The 2004 version of ISA Standard S84.01 recognizes manual actions as valid components of safety instrumented functions (SIFs).
- Pumps include all rotating machinery containing or exposed to PSM-covered materials, e.g., pumps, compressors, fans, blowers and agitators. It would also include any non-rotating machinery, such as an eductor, that is used to move PSM-covered fluids.

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## Mechanical Integrity

- However, you also should seriously consider adding to the MI program other equipment types that impact process safety. Examples include:
  - employee alarm systems;
  - structural and civil systems (including foundations, anchor bolts, supports, pipe hangers, pipe bridges, etc.) that support the weight or movement of equipment otherwise included in the MI program;
  - key utility or service systems or components for equipment included in the PSM program, including electrical power, air, steam, nitrogen/inerting, cooling water, refrigeration/chilling, explosion suppression, quenching, etc., where the utility failure could contribute to a process safety scenario or prevent properly a covered process release scenario.

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## Mechanical Integrity

- It's not just the OSHA Standard - There's More
- OSHA Compliance Directive on PSM - Clarifies how OSHA will apply the law
- Over 275 OSHA Letters of Interpretation - These are letters that OSHA issues to clarify how the standard will apply based on questions they receive
- Incorporated by reference standards in 1910.6 including ANSI, ASTM, CGA, NFPA and other codes specifically stated in the standard
- Governing Codes - More up to date codes with more requirements than just the incorporated by reference standards above including: ANSI, ASTM, CGA, NFPA, AISC and many others
- Recognized And Generally Accepted Good Engineering Practice" (RAGAGEP)
- Best practices such as Center for Chemical Process Safety (CCPS)
- The Employer has developed the MI program to comply with all of these.

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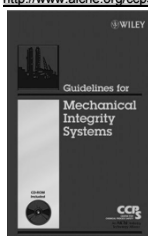
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## Mechanical Integrity & The Center for Chemical Process Safety (CCPS)

<http://www.aiche.org/ccps>




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## Center for Chemical Process Safety (CCPS)

- AIChE established the Center for Chemical Process Safety in 1985 to Focus on Engineering and Management Practices That Help Prevent and Mitigate Catastrophic Process Safety Accidents.



Video: Oklahoma Refinery Fire 2012

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## Mechanical Integrity & CCPS

### The Primary Process Steps

- Selecting Equipment Covered
- Inspection & Testing
- MI Specific Training
- MI Procedure Development
- Quality Assurance
- Equipment Deficiency Management
- Equipment Specific Integrity Programs
- MI Program Development
- Risk Management Tools
- Continuous Improvement of MI Program

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## Mechanical Integrity & CCPS

### CCPS contains provisions for enhanced MI control systems

**New equipment design, fabrication and installation** - During this phase, activities focus on ensuring that new equipment is suitable for its intended service; therefore, many of the activities in this phase are directly related to the QA activities for the early part of the equipment life cycle

**Inspection and testing** - During this phase, activities focus on ensuring the ongoing integrity of equipment or functionality of equipment safeguards for a specified inspection and testing interval

**Preventative Maintenance** - During this phase, activities focus on preventing premature failure of the equipment and its components, and can include performing servicing tasks (e.g., lubrication) and/or inspecting and replacing components that are subject to wear

**Repair** - During this phase, activities focus on responding to equipment failures, and repairing and returning equipment to service in a condition suitable for its intended use

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## MI – The Process You Should Expect to See

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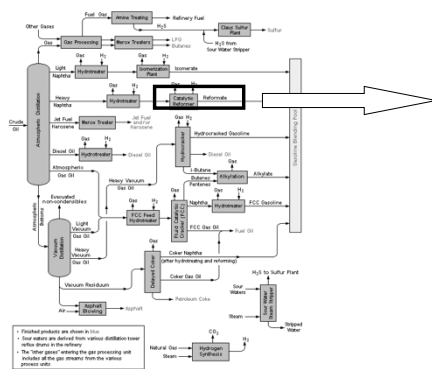
## The Mechanical Integrity Process

- In Order to Maintain System Integrity, We Must Assemble:
- Block Flow Diagrams
- P&ID's
- Mechanical Integrity Information
- Quality Assurance Information

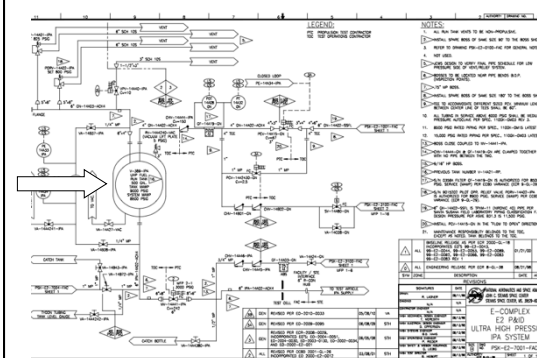
Let's Review The Process...

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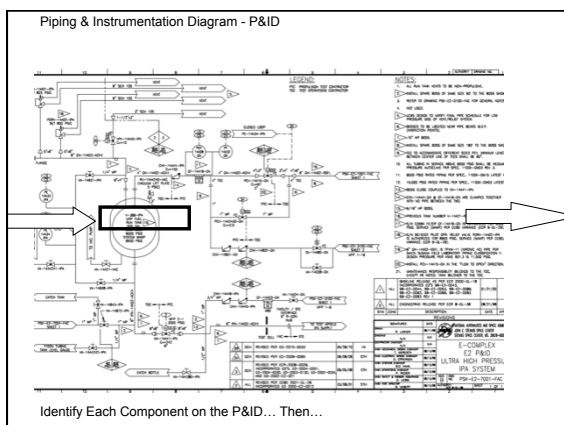
Remember - Block Diagram



Piping & Instrumentation Diagram - P&ID








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## Mechanical Integrity

- Mechanical Integrity information
  - Must be Obtained for Each Component of the Process
  - Must be Marked with Location Numbering System that Follows Form
  - Tracked Throughout the PSM Program
  - Compliance with Good Engineering Practices is Acceptable




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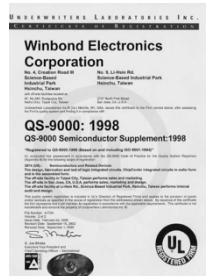
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## Mechanical Integrity

- Mechanical Integrity information Can Be:
  - ASME information for Vessels & Pipes
  - ASTM Specification Sheets
  - ANSI Specification Sheets
  - NFPA 70E Classified Wiring Specification Sheets




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## Design Codes & Mechanical Integrity

- Design Codes Drive Many Times Drive Mechanical Integrity / Inspection & Testing & Quality Assurance




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## Advanced MI You Might Expect to See

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## Mechanical Integrity

Mechanical Integrity Information should be obtained on assets including the following:

- Piping system components including
  - Filters,
  - Strainers
  - Flanges
  - Gasket materials
  - Valves
  - Mechanical portions of instrumentation
- Pressure vessels




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## Mechanical Integrity

Mechanical Integrity Information should be obtained on assets including the following:

- Heat exchangers
- Relief and vents systems such as
  - Relief valves
  - Rupture disks
  - Conservation vents
  - Vent systems
  - Vacuum breakers
  - Flares.
- Reference: ASME, API, NFPA, NBBPVI, ANSI K61,1, FM, UL and ASTM

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## Mechanical Integrity

- Controls also include mechanical systems or devices that are intended to terminate or regulate the covered process
- The 2004 version of ISA Standard S84.01 recognizes manual actions as valid components of safety instrumented functions (SIFs).
- Pumps Include:
  - Pumps of All Types
  - Compressors,
  - Fans
  - Blowers
  - Agitators
  - Eductors




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## Mechanical Integrity

- However, you also should consider adding to the MI program other equipment types that impact process safety. Examples include:

- Employee alarm systems
- Structural and civil systems including
  - Foundations
  - Anchor bolts
  - Pipe hangers & bridges




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## Mechanical Integrity

Continuing Examples Include

■ Key utility or service systems including

- In House Electrical Power
- Air & Steam Systems
- Nitrogen/Inerting Systems,
- Cooling Water
- Refrigeration/Chilling
- explosion suppression
- Electrical Systems - NFPA, IEEE 446, NFPA 111, NFPA 70



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## Mechanical Integrity & CCPS

TABLE 9-11  
Summary of Commonly Used NFPA Codes for Fire Protection Systems

| Fire Protection Systems            | NFPA Code                            |  |
|------------------------------------|--------------------------------------|--|
|                                    | Design and Installation Requirements | Inspection, Test, and Maintenance Requirements |
| Fire detection and alarm systems   | NFPA 72                              | NFPA 72  |
| Automatic sprinkler systems        | NFPA 13                              | NFPA 25  |
| Water spray systems                | NFPA 15                              | NFPA 25  |
| Foam-water sprinkler systems       | NFPA 16                              | —  |
| Foam systems                       | NFPA 11                              | NFPA 25  |
| Standpipe and hose systems         | NFPA 14                              | NFPA 25 and ISO                                |
| Fire pumps                         | NFPA 20                              | NFPA 25  |
| Water supply systems               | NFPA 22 and 24                       | NFPA 25  |
| Fire hydrants                      | NFPA 24                              | NFPA 25  |
| Portable fire extinguishers        | NFPA 10                              | NFPA 10  |
| Fire doors and dampers             | NFPA 80 and ISA                      | —  |
| Foam systems                       | NFPA 11A                             | NFPA 11A                                       |
| Carbon dioxide systems             | NFPA 12                              | NFPA 12  |
| Clean agent systems                | NFPA 2001                            | NFPA 2001                                      |
| Dry chemical extinguishing systems | NFPA 17                              | NFPA 17  |
| Buildings and structures           | NFPA 101                             | NFPA 101                                       |

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## Mechanical Integrity

■ Additional Examples of Mechanical Integrity Information

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[illegible][illegible]

**Georg Fisher Type 360 Ball Check Valve – Engineering Specification**

**1.0 Summary**  
The product specified in this document is for Type 360 Ball Check Valve from Georg Fischer.

**2.0 Specification and Certifications**  
The valve is to meet ASTM standards for PVC and CPVC materials. Polypropylene and PVDF versions shall be FDA CFR 21 177.1520 and USP 25 Class VI (physiological non-toxic) compliant. Polypropylene 360 valves will be in accordance with EN ISO 15494 specification. PVDF 360 valves will be in accordance with ISO 10951 specification.

**2.1 Pressure/Temperature**  
The 360 Ball Check valves are rated for:  
232 PSI for PVC and CPVC socket at 72°F  
150 PSI for PVC and CPVC threaded at 72°F  
150 PSI for PP at 72°F  
232 PSI for PVDF fusion at 72°F  
150 PSI for PVDF threaded at 72°F

**2.2 Materials**  
The 360 valve body shall be constructed of PVC, CPVC, Polypropylene, or PVDF. All seals shall be made of FPM or EPDM.

**2.3 Function**  
Ball check valves 3/8" through 2" shall be of true union design. Body interior shall have molded ribs to serve as a cage and ball guide to assure proper seating. Valve may be equipped with a screen to create a foot valve. Seat carrier shall have left-hand threads to prevent possible unscrewing when threaded end connector is installed on the pipe.

**4.0 Approved Manufacturer**  
Approved manufacturer is Georg Fischer with no equal.

[illegible][illegible]

# HAYNES<sup>®</sup>

CORROSION-RESISTANT ALLOYS

## FABRICATION OF HASTELLOY<sup>®</sup> CORROSION-RESISTANT ALLOYS

General Guidelines for  
Welding, Brazeing, Hot and  
Cold Working, Heat Treating,  
Pickling and Finishing

|                           |    |
|---------------------------|----|
| Contents                  | 2  |
| Introduction              | 2  |
| Welding                   | 3  |
| General and Health        | 11 |
| Corrosion                 | 12 |
| Welding                   | 13 |
| Forming                   | 14 |
| Hot Working               | 15 |
| Cold Working              | 16 |
| Heat Treating (I)         | 17 |
| Heat Treating (II)        | 18 |
| Cleaning and Pickling     | 19 |
| Anodizing and Passivation | 20 |
| Chemical Composition      | 21 |
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| Available Forms           | 24 |
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11-0000

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## WELDING

### General Welding

The welding characteristics of the IN625/690 corrosion-resistant alloys are similar in many ways to those of the austenitic stainless steels and present no special welding problems. Common techniques and procedures are followed.

As a way of achieving quality production welds, development and qualification of welding procedure specifications is suggested. Such procedures are usually required for code fabrication, and should take into account parameters such as, but not limited to, base and filler materials, welding process, joint design, electrode characteristics, preheat/interpass control, and postweld heat treatment requirements.

Any modern welding power supply with adequate output and controls may be used with the common fusion welding processes. Careful welding technique is controlled in the low to moderate range. While service loads are not recommended, stringer bead welding techniques, with some electroslag/air carbon arc gouging, are preferred.

In general, nickel-based alloys will exhibit both sluggish wetting and mobile penetration characteristics. Therefore, care must be used with respect to joint design and weld bead placement to ensure that sound welds with proper weld bead form are achieved. The nickel-based alloys have a tendency to form cracks, the grinding of starts and stops is recommended.

Cleanliness is considered an important aspect of welding of the corrosion-resistant nickel-based alloys. Contamination by grease, oil, ammonia products, salt, sulfur, and other welding joint elements can result in severe cracking problems.

It is recommended that welding be performed on base materials that are in the solution annealed condition. Materials with > 7% carbon (over 0.07% C) should be solution annealed before welding. The welding of materials with large amounts of residual cold work can lead to cracking in the weld metal and/or the weld heat affected zone. Welding processes that are commonly used with the corrosion-resistant alloys are shown in Table 1.

In addition to these common air welding processes, other welding processes such as plasma arc welding, resistance spot welding, laser beam welding, electron beam welding, and submerged arc welding can be used. Because of the possibility of hot cracking, postweld solution is extremely important when using the submerged arc welding process to weld nickel-based alloys. Consult Hughes International for welding parameter and service recommendations.

The plasma arc cutting process is commonly used to cut alloy plate into desired shapes and proper weld angles.

The use of oxyacetylene welding and cutting is not recommended because of carbon pick-up from the flame.

TABLE 1

| Process                    | American Welding Society Designation | Common Designation         |
|----------------------------|--------------------------------------|----------------------------|
| Gas Tungsten Arc Welding   | TIG                                  | TIG                        |
| Shielded Metal Arc Welding | GTAW                                 | TIG                        |
| Gas Metal Arc Welding      | GMW                                  | MIG                        |
| Shielded Metal Arc Welding | GMW                                  | Stick or Covered Electrode |

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The fabrication techniques are considered design known and require no special tools, equipment, or highly trained personnel. Figure 9A shows the general configuration of the corrosion-resistant alloy air carbon arc gouging alternative (Figure 9B, below) may be applied to some joints. This method is generally used in the chemical process industry.

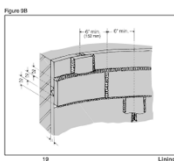
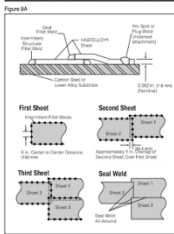
Key points to consider during fabrication include:

- 1. Lay out the installation pattern in advance.
- 2. Develop welding parameters and maintain in advance.
- 3. Perform weld in dry environment.
- 4. Protect sensitive surface as necessary.
- 5. Bluntly chamfer sheets to the substrate.
- 6. Seal weld all around.
- 7. Inspect and test welds for leak tight condition.
- 8. Sign condition.
- 9. Repair any detectable areas as necessary.

One of the important features of this fabrication technique is the lack of concern with substrate solution of the weld metal during seal welding. As shown in Figure 9A, air carbon arc gouging is a dry fabrication technique. Additionally, this technique reduces the possibility of manufacturing errors such as, but not limited to, improper heat flow with the substrate and to repair concern about damage due to erosion.

There are several areas where shop formed parts can save time and effort. Edge and corner rounding can be placed.

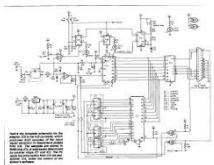
### GENERAL WELDING AND LAYOUT CONFIGURATION



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## Mechanical Integrity

- The Documentation can be voluminous
- Digital Storage and Management is Recommended
- Tracking Systems must be in Place



## Mechanical Integrity

### ■ Consider Using Technology. Most MI Programs Can Perform the Following:

- Identification and list of all covered equipment, including piping circuits
- Completed data sheets and a populated data base for each item
- Criticality rating with probability and consequence of failure for each item
- Documented visual inspections with inspection sketches or AutoCAD Drawings
- Field verified and red-lined P&IDIs
- Corrosion study to establish failure mechanisms
- Process study to identify process systems and conditions for consequence analysis
- Inspection and test plans based on equipment type, failure modes, and Criticality Rating
- Inspection and testing according to the equipment plan
- Deficiency reports identifying conditions that do not meet the acceptance criteria Recommendation Tracking
- Updated equipment plans identifying future inspection and testing requirements

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## Inspection & Testing

### 1910.119(j)(4)

Inspections and tests shall be performed on process equipment. Inspection and testing procedures shall follow recognized and generally accepted good engineering practices. The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience. The employer shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

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## Inspection & Testing

### ■ Inspection & Testing Activities Must Conform to the Requirements of the Applicable Code such as:

- ASME
- ANSI
- ASTM
- NFPA
- CGA
- And Any Other Applicable Codes

|  |  |
|--|--|
| <p>1. The purpose of this section is to establish the minimum requirements for the inspection and testing of process equipment. The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience. The employer shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.</p> |  |
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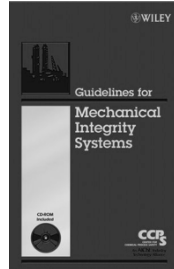
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## Inspection & Testing & CCPS

- The CCPS Book Contains Many Tables that are Useful in the Performance of Design, Inspection & Testing
- Let's Review Some of these Tables...



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## Mechanical Integrity & CCPS

| Issuing Organization | Number                   | Document Title  | Application  |
|----------------------|--------------------------|---|--|
| API                  | API 510                  | Pressure Vessel Inspection Code: Mechanical Inspection, Repair, Alteration, and Retesting | Covers the mechanical inspection, repair, alteration, and retesting procedures for pressure vessels  |
| API                  | Recommended Practice 575 | Inspection of Pressure Vessels  | Covers the inspection of pressure vessels  |
| API                  | API 576                  | Design and Construction of Heat Exchangers for Service Refinery Services                  | Defines the minimum requirements for the mechanical design, material selection, inspection, repair, testing, and preparation for shipment of shell and tube heat exchangers                    |
| ASME                 | ASME Code, Section VIII  | ASME Rules and Pressure Vessel Code (PVC), Unified Pressure Vessels                       | Provides requirements applicable to the design, fabrication, inspection, testing, and certification of pressure vessels operating at or below internal or external pressures exceeding 15 psig |
| MBPS                 | National Board           | National Board Inspection Code  | Provides rules and guidelines for the inspection of boilers, pressure vessels, piping, and pressure-retaining parts and for the repair of them   |

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## Mechanical Integrity & CCPS

| Issuing Organization | Number  | Document Title  | Application   |
|----------------------|---------|---|---|
| API                  | API 650 | Inspection, Repair, Alteration, and Retesting of Atmospheric and Low-pressure Storage Tanks   | Covers the inspection, repair, alteration, and retesting of atmospheric and low-pressure storage tanks designed to operate at pressures from atmospheric to 15 psig   |
| API                  | 651     | Design and Construction of Large, Welded, Low-pressure Carbon Steel Atmospheric Storage Tanks | Covers the design and construction of large, welded, low-pressure carbon steel atmospheric storage tanks, including fabrication rules that take a single welded side of construction. Applies to tanks with pressures at their design levels of not more than 15 psig |
| API                  | 652     | Insulated Steel Tanks for Oil Storage   | Covers the mechanical, fabrication, erection, and testing requirements for atmospheric, vertical, cylindrical storage tanks with single or double steel storage shells. Applies to tanks with internal pressures approximating atmospheric pressure                   |
| API                  | 653     | Tank Inspection, Repair, Alteration, and Retesting  | Covers the inspection, repair, alteration, and reconstruction of steel atmospheric storage tanks  |

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## Mechanical Integrity & CCPS

| TABLE 9-3<br>RAGAGEPs for Process Piping |               |  |   |
|--|---------------|--|---|
| Issuing Organization                     | Document      |  | Application   |
|  | Number        | Title  |   |
| AIChE                                    | ANSI/ISA 88.1 | 88.1-1 Process Piping  | Provides requirements for materials and components, design, fabrication, assembly, installation, maintenance, inspection, and testing of piping.  |
| API                                      | API 570       | Piping Inspection Code: Inspection, Repair, Alteration, and Testing of in-Service Piping Systems | Provides provisions for the inspection, repair, alteration, and testing of in-service piping that has been in service.  |
| API                                      | API 574       | Inspection Practices for Piping System Components  | Covers inspection practices for piping, tubing, valves (not including control valves), and flanges. This document is a supplement to ANSI/API 570.  |
| MSRP                                     | MS-23         | National Board Inspection Code   | Provides rules and guidelines for in-service inspection of ducts, pipelines, vessels, piping, and PFRs. Also provides rules for the repair, alteration, and testing of pressure-retaining items and for the repair of PFRs. |

## Mechanical Integrity & CCPS

| TABLE 9-4<br>RAGAGEPs for Pressure-Relieving Devices |                                |   |   |
|--|--------------------------------|---|---|
| Issuing Organization                                 | Document                       |   | Application   |
|  | Number                         | Title   |   |
| AIChE/ASME   | ANSI/ASME 88.3                 | 88.3-1 Process Piping   | Provides requirements for materials and components, design, fabrication, assembly, installation, maintenance, inspection, and testing of piping.  |
| API  | API 510                        | Pressure Vessel Inspection Code: Materials, Inspection, Repair, and Alteration                        | Covers the materials, inspection, repair, alteration, and testing practices for pressure vessels used by the petroleum and chemical process industries. Also covers inspection and testing of pressure relief devices.  |
| API  | API 520                        | Sizing, Selection, and Installation of Pressure-Relieving Devices in Refineries, Part 1: Installation | Covers the sizing, selection, and installation of pressure relief devices for equipment that has a maximum allowable working pressure of 15.0 psig or greater.  |
| API  | API 521                        | Inspection of Pressure-Relieving Devices  | Provides the inspection and repair practices for additional pressure-relieving devices, including pressure safety valves (PSVs), pilot-operated PFRs, rupture disks, and self-closing pressure-relief valves.   |
| ASME   | ASME B84.1<br>Code, Section IV | ASME B84.1 Code, Section IV   | Provides requirements for the materials of construction and the inspection of pressure, electric, and mechanical boilers, as well as high-temperature water tubes used in electric power.   |
| ASME   | ASME B84.1<br>Code, Section IV | ASME B84.1 Code, Section IV   | Provides requirements for design, fabrication, inspection, and testing of steam generating boilers, and of water tubes intended for the transport service that are directly fired by oil, gas, electricity, or coal. It also covers methods of checking safety valves and safety relief valves. |
| ASME   | ASME B84.1<br>Code, Section IV | ASME B84.1 Code, Section IV   | Provides requirements applicable to the design, fabrication, inspection, testing, and certification of pressure vessels operating under the stress of internal pressure, external pressure, or vacuum. It also covers methods of checking safety valves and safety relief valves.               |
| MSRP   | MS-23                          | National Board Inspection Code  | Provides rules and guidelines for in-service inspection of ducts, pipelines, vessels, piping, and PFRs. Also provides rules for the repair, alteration, and testing of pressure-retaining items and for the repair of PFRs.   |

## Mechanical Integrity & CCPS

| TABLE 9-5<br>RAGAGEPs for Instrumentation and Controls   |                                   |  |   |
|--|-----------------------------------|--|---|
| Issuing Organization                                     | Document                          |  | Application   |
|  | Number                            | Title  |   |
| API  | API 501                           | Process Measurement Instrumentation  | Provides provisions for the installation of the more generally used measuring and control instruments and related components.   |
| API  | API 504                           | Process Instrumentation and Control  | Covers general requirements for instrumentation for the detection, specification, installation, and testing of process instrumentation and control systems.   |
| API  | API 505                           | Process Instrumentation  | Addresses the associated systems, installation, and maintenance of analysis.  |
| ASME   | ASME 19.1                         | Control and Safety Devices for Hazardously Fired Boilers   | Covers requirements for the assembly, maintenance, and operation of control and safety devices installed on automatically fired boilers that are fired with gas, oil, gas, or electricity, subject to certain service limitations and exceptions. |
| International<br>Electrotechnical<br>Commission<br>(IEC) | IEC 61508-3                       | Functional safety: at risk of electrical/electronic programmable electronic safety-related systems | Part 3 of the standard is to set safety life cycle activities for systems containing electronic and/or programmable electronic components that are used in safety-related functions.  |
| ISA  | ISA 800.02                        | Application of SIS for the Process Industries  | Provides a safety life cycle and requirements for design, installation, and maintenance of SIS.   |
| ISA  | ISA 800.02-03<br>Part 1 through 3 | Safety Instrumented Functions (SIF): Safety Integrity Level (SIL) Evaluation Methodology           | This series covers the different evaluation techniques that can be used to determine if a specific SIL design satisfies the SIL requirements defined in the SIL.  |
| ISA  | ISA 800.02-03                     | Verification of Emergency Shutdown (ESD) Systems and Control for the Control of Process Safety     | Provides general requirements for determining safety critical ESDs and controls, and for verifying the installed instrumentation.   |
| MSRP   | MSPA-23                           | Boiler and Combustion Systems Insulation Code  | Covers the materials, maintenance, inspection, testing, and safety in the installation of combustion system insulation.   |

[illegible][illegible]

- Comply with all Manufacturer's Requirements if Acceptable To the Process
- If Not, Support Your Selected Requirements by:
  - Engineering Analysis
  - Risk Based Inspection Process
  - RAGAGEP
  - FMEA



- **Must be Documented**
- **CCPS Recommends Documentation of the Following:**
  - Equipment Identifier
  - Date Inspection Performed
  - Description of Task Performed
  - Results of the Test or Inspection
  - Fitness for Service Evaluation
  - Any Parts or Materials Used
  - Qualification or Certification Records for Performing Tasks
  - Identified Deficiencies
  - Remaining Life Calculations
  - Recommendations on Next Due Date of Inspection or Testing

[illegible]

# Inspection & Testing & CCPS

- All Inspections & Testing Must Be:
  - Documented
  - Completed in the Required Time Frame in Order to Maintain Integrity
  - Tracked to Completion

INSTRUMENT CALIBRATION PROGRAM TEST REPORT

TEST NO. 100  
TEST NAME: ANALYZER  
TEST RESULT: 10.00  
TEST UNIT: VOLTAGE

TESTER: J. L. HARRIS  
DATE: 10/10/68

TEST RESULTS:

| TEST NO. | TEST NAME                      | TEST RESULT | TEST UNIT |
|----------|--------------------------------|-------------|-----------|
| 1        | VOLTAGE                        | 10.00       | V         |
| 2        | CURRENT                        | 0.00        | A         |
| 3        | RESISTANCE                     | 1.00        | Ω         |
| 4        | TEMPERATURE                    | 25.00       | °C        |
| 5        | WATTAGE                        | 0.00        | W         |
| 6        | POWER                          | 0.00        | W         |
| 7        | ENERGY                         | 0.00        | J         |
| 8        | FORCE                          | 0.00        | N         |
| 9        | STRESS                         | 0.00        | MPa       |
| 10       | STRAIN                         | 0.00        | %         |
| 11       | DISPLACEMENT                   | 0.00        | m         |
| 12       | VELOCITY                       | 0.00        | m/s       |
| 13       | ACCELERATION                   | 0.00        | m/s²      |
| 14       | TIME                           | 0.00        | s         |
| 15       | ANGLE                          | 0.00        | °         |
| 16       | ROTATION                       | 0.00        | °/s       |
| 17       | TORQUE                         | 0.00        | N·m       |
| 18       | MOMENT                         | 0.00        | N·m       |
| 19       | IMPULSE                        | 0.00        | N·s       |
| 20       | SHOCK                          | 0.00        | m/s²      |
| 21       | VIBRATION                      | 0.00        | m/s²      |
| 22       | NOISE                          | 0.00        | dB        |
| 23       | EMISSION                       | 0.00        | W/m²      |
| 24       | ABSORPTION                     | 0.00        | W/m²      |
| 25       | REFLECTANCE                    | 0.00        | %         |
| 26       | TRANSMITTANCE                  | 0.00        | %         |
| 27       | SCATTERING                     | 0.00        | %         |
| 28       | DIFFUSION                      | 0.00        | %         |
| 29       | CONDUCTION                     | 0.00        | W/m·K     |
| 30       | CONVECTION                     | 0.00        | W/m²·K    |
| 31       | RADIATION                      | 0.00        | W/m²·K⁴   |
| 32       | HEAT FLUX                      | 0.00        | W/m²      |
| 33       | HEAT CONDUCTIVITY              | 0.00        | W/m·K     |
| 34       | HEAT CAPACITY                  | 0.00        | J/kg·K    |
| 35       | HEAT EXPANSION                 | 0.00        | 1/K       |
| 36       | HEAT CONTRACTION               | 0.00        | 1/K       |
| 37       | HEAT STABILITY                 | 0.00        | 1/K       |
| 38       | HEAT SENSITIVITY               | 0.00        | 1/K       |
| 39       | HEAT RESISTANCE                | 0.00        | K/W       |
| 40       | HEAT CONDUCTANCE               | 0.00        | W/K       |
| 41       | HEAT EFFICIENCY                | 0.00        | %         |
| 42       | HEAT LOSS                      | 0.00        | W         |
| 43       | HEAT GAIN                      | 0.00        | W         |
| 44       | HEAT BALANCE                   | 0.00        | W         |
| 45       | HEAT FLUX DENSITY              | 0.00        | W/m²      |
| 46       | HEAT FLUX VECTOR               | 0.00        | W/m²      |
| 47       | HEAT FLUX SCALAR               | 0.00        | W/m²      |
| 48       | HEAT FLUX TENSOR               | 0.00        | W/m²      |
| 49       | HEAT FLUX MATRIX               | 0.00        | W/m²      |
| 50       | HEAT FLUX VECTOR FIELD         | 0.00        | W/m²      |
| 51       | HEAT FLUX SCALAR FIELD         | 0.00        | W/m²      |
| 52       | HEAT FLUX TENSOR FIELD         | 0.00        | W/m²      |
| 53       | HEAT FLUX MATRIX FIELD         | 0.00        | W/m²      |
| 54       | HEAT FLUX VECTOR FIELD DENSITY | 0.00        | W/m²      |
| 55       | HEAT FLUX SCALAR FIELD DENSITY | 0.00        | W/m²      |
| 56       | HEAT FLUX TENSOR FIELD DENSITY | 0.00        | W/m²      |
| 57       | HEAT FLUX MATRIX FIELD DENSITY | 0.00        | W/m²      |
| 58       | HEAT FLUX VECTOR FIELD VECTOR  | 0.00        | W/m²      |
| 59       | HEAT FLUX SCALAR FIELD SCALAR  | 0.00        | W/m²      |
| 60       | HEAT FLUX TENSOR FIELD TENSOR  | 0.00        | W/m²      |
| 61       | HEAT FLUX MATRIX FIELD MATRIX  | 0.00        | W/m²      |
| 62       | HEAT FLUX VECTOR FIELD MATRIX  | 0.00        | W/m²      |
| 63       | HEAT FLUX SCALAR FIELD MATRIX  | 0.00        | W/m²      |
| 64       | HEAT FLUX TENSOR FIELD MATRIX  | 0.00        | W/m²      |
| 65       | HEAT FLUX MATRIX FIELD MATRIX  | 0.00        | W/m²      |
| 66       | HEAT FLUX VECTOR FIELD MATRIX  | 0.00        | W/m²      |
| 67       | HEAT FLUX SCALAR FIELD MATRIX  | 0.00        | W/m²      |
| 68       | HEAT FLUX TENSOR FIELD MATRIX  | 0.00        | W/m²      |
| 69       | HEAT FLUX MATRIX FIELD MATRIX  | 0.00        | W/m²      |
| 70       | HEAT FLUX VECTOR FIELD MATRIX  | 0.00        | W/m²      |
| 71       | HEAT FLUX SCALAR FIELD MATRIX  | 0.00        | W/m²      |
| 72       | HEAT FLUX TENSOR FIELD MATRIX  | 0.00        | W/m²      |
| 73       | HEAT FLUX MATRIX FIELD MATRIX  | 0.00        | W/m²      |
| 74       | HEAT FLUX VECTOR FIELD MATRIX  | 0.00        | W/m²      |
| 75       | HEAT FLUX SCALAR FIELD MATRIX  | 0.00        | W/m²      |
| 76       | HEAT FLUX TENSOR FIELD MATRIX  | 0.00        | W/m²      |
| 77       | HEAT FLUX MATRIX FIELD MATRIX  | 0.00        | W/m²      |
| 78       | HEAT FLUX VECTOR FIELD MATRIX  | 0.00        | W/m²      |
| 79       | HEAT FLUX SCALAR FIELD MATRIX  | 0.00        | W/m²      |
| 80       | HEAT FLUX TENSOR FIELD MATRIX  | 0.00        | W/m²      |
| 81       | HEAT FLUX MATRIX FIELD MATRIX  | 0.00        | W/m²      |
| 82       | HEAT FLUX VECTOR FIELD MATRIX  | 0.00        | W/m²      |
| 83       | HEAT FLUX SCALAR FIELD MATRIX  | 0.00        | W/m²      |
| 84       | HEAT FLUX TENSOR FIELD MATRIX  | 0.00        | W/m²      |
| 85       | HEAT FLUX MATRIX FIELD MATRIX  | 0.00        | W/m²      |
| 86       | HEAT FLUX VECTOR FIELD MATRIX  | 0.00        |           |

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## Quality Assurance

1910.119(j)(6)

In the construction of new plants and equipment, the employer shall assure that equipment as it is fabricated is suitable for the process application for which they will be used. Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions. The employer shall assure that maintenance materials, spare parts and equipment are suitable for the process application for which they will be used.

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## Quality Assurance & Code Compliance

- The Design, Installation Procedures, Repairs, and Temporary Repairs Must Conform to the Requirements of the Applicable Code such as:
  - ASME
  - ANSI
  - ASTM
  - NFPA
  - CGA
  - Any Other Applicable Codes

**De Dietrich** 

DE DIETRICH S.A., 10070 RUE DE LA CHAUSSEE DE WATTEVILLE, 13000 MARSEILLE, FRANCE  
TELEPHONE: 01 42 20 00 00 FAX: 01 42 20 00 01

November 15, 2000

**CUSTOMER:** MALLINCKRODT INCORPORATED  
1000 Campus Drive  
Bridgewater, NJ 08807  
Attn: John Nemes

**P.O. #** : 810000  
**U.S. #** : 810000  
**DATE** : 11/15/00  
**DATE, BILLING** : 11/15/00  
**INVOICE TYPE** : REGULAR  
**TERMS** : Net 30

**Package Description:**

|   |                                  |
|---|----------------------------------|
| 1 | ABBE France (1 and 3-4)          |
| 2 | ABBE France (1 and 3-4)          |
| 3 | Stomaphys (1 Europe and 8 Stamp) |
| 4 | Q-C (Chen Impression Reagents)   |

These are the estimated quantities of this cover page appearing amongst these items. Confirmation and correct use is the customer's duty.

De Dietrich S.A., Inc.  
P.O. Box 2000  
Carpas, China, Texas 75840  
Tel: 409-682-2222 Fax: 409-682-2222

For the signed copy to (Mall) Send Mail: ATTN: Elizabeth

DeDietrich

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## Quality Assurance & CCPS

### ■ CCPS Details that Quality Assurance Activities Exist for All of The Life Cycle Stages of Equipment

- Design/Engineering
- Procurement
- Fabrication
- Receiving
- Storage & Retrieval
- Construction & Installation
- In-Service Repairs, Alterations and Re-Rating
- Temporary Installations & Repairs
- Decommissioning and reuse



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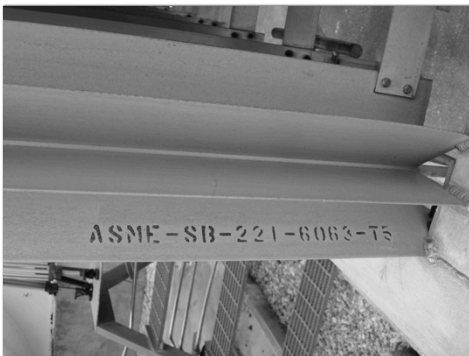
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## Quality Assurance

- Just Like Inspection & Testing
- Comply with all Manufacturer's Requirements if Acceptable To the Process
- If Not, Support Your Selected Requirements by:
  - Engineering Analysis
  - Risk Based Inspection Process
  - RAGAGEP
  - FMEA




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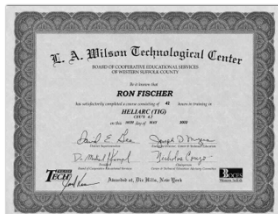
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## Quality Assurance

- For Maintenance Operations, Quality Assurance Might Also Require:
  - Certified Welders
    - In the Process to be Welded
  - AISC Trained Steel Erectors
  - Other Recognized Certifications




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## MI Process & CCPS What We Must Consider

| New Equipment Design, Fabrication, and Installation |             | Inspection and Testing       |             | Preventive Maintenance                    |             | Repair                          |             |
|---|-------------|------------------------------|-------------|---|-------------|---------------------------------|-------------|
| Activity  | Frequency   | Activity                     | Frequency   | Activity                                  | Frequency   | Activity                        | Frequency   |
| <b>Example Activities and Typical Frequencies</b>   |             |                              |             |   |             |                                 |             |
| • Equipment specifications                          | As required | • External visual inspection | As required | • Active testing (e.g., hydrostatic test) | As required | • Equipment repair              | As required |
| • Material specifications                           | As required | • Thickness measurements     | As required | • Leak testing                            | As required | • Active repair (e.g., welding) | As required |
| • Pressure design                                   | As required | • Pressure testing           | As required | • Corrosion monitoring                    | As required | • Replacement of components     | As required |
| • Manufacturing requirements                        | As required | • Leak testing               | As required | • Non-destructive testing                 | As required | • Replacement of components     | As required |
| • Quality assurance                                 | As required | • Corrosion monitoring       | As required | • Active testing (e.g., hydrostatic test) | As required | • Replacement of components     | As required |
| • Installation requirements                         | As required | • Non-destructive testing    | As required | • Leak testing                            | As required | • Replacement of components     | As required |
| • Design approved by vendor                         | As required | • Acceptance testing         | As required | • Corrosion monitoring                    | As required | • Replacement of components     | As required |
| • Design certified by vendor                        | As required | • Acceptance testing         | As required | • Non-destructive testing                 | As required | • Replacement of components     | As required |
| • Equipment certification                           | As required | • Acceptance testing         | As required | • Active testing (e.g., hydrostatic test) | As required | • Replacement of components     | As required |
| • Documentation                                     | As required | • Acceptance testing         | As required | • Leak testing                            | As required | • Replacement of components     | As required |
| • Commissioning                                     | As required | • Acceptance testing         | As required | • Corrosion monitoring                    | As required | • Replacement of components     | As required |
| • Acceptance and                                    | As required | • Acceptance testing         | As required | • Non-destructive testing                 | As required | • Replacement of components     | As required |

## MI Process & CCPS What We Must Consider

**TABLE 9-13 (Continued)**

| New Equipment Design, Fabrication, and Installation  |  | Inspection and Testing  |  | Preventive Maintenance   |  | Repair   |           |
|--|--|---|--|--|--|--|-----------|
| Activity   | Frequency  | Activity  | Frequency  | Activity   | Frequency  | Activity   | Frequency |
| <ul style="list-style-type: none"> <li>Equipment specifications</li> <li>Material specifications</li> <li>Pressure design</li> <li>Manufacturing requirements</li> <li>Quality assurance</li> <li>Installation requirements</li> <li>Design approved by vendor</li> <li>Design certified by vendor</li> <li>Equipment certification</li> <li>Documentation</li> <li>Commissioning</li> <li>Acceptance and</li> </ul> | <ul style="list-style-type: none"> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> </ul> | <ul style="list-style-type: none"> <li>External visual inspection</li> <li>Thickness measurements</li> <li>Pressure testing</li> <li>Leak testing</li> <li>Corrosion monitoring</li> <li>Non-destructive testing</li> <li>Acceptance testing</li> <li>Acceptance testing</li> <li>Acceptance testing</li> <li>Acceptance testing</li> <li>Acceptance testing</li> <li>Acceptance testing</li> <li>Acceptance testing</li> <li>Acceptance testing</li> </ul> | <ul style="list-style-type: none"> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> </ul> | <ul style="list-style-type: none"> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> </ul> | <ul style="list-style-type: none"> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> </ul> | <ul style="list-style-type: none"> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> <li>As required</li> </ul> |           |

## Now...What About Risk Based Mechanical Integrity?

What is It?  
What Should You Expect to See?

## RBMI - Based on API 580/581

- Risk-based approaches for inspection and testing of fixed equipment for mechanical integrity (API 580/581) and for the integrity of Safety Instrumented Systems (ANSI/ISA-84 -IEC 61511 Mod) are well established.
- RBI for pressured fixed equipment is defined by a minimum set of requirements in API RP 580 - Risk-Based Inspection. RP 580 presents the principals and minimum general guidelines for implementing and sustaining an RBI program. Much of the technology in its application is described in API RP 581 - Risk-Based Inspection Technology

Thomas J. Falk P.E. Lloyd's Register Capabilities, Inc.

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## RBMI – Effective PM

An effective PM program should:

- improve plant reliability and plant safety – a shift away from reactive maintenance and the resulting operational issues
- provide a rational basis for the development of PM program activities and their intervals based on RAGAGEP (Recognized and Generally Accepted Good Engineering Practice) or sound engineering and reliability principles
- using a structured logical approach that will provide consistent results create and document appropriate PM strategies for plant equipment with their basis (including targeted damage mechanisms and affected components/parts)
- provide risk-based prioritization with resulting improved effectiveness integrate EHS and economic driven PM activities
- document results and respond to non-conformances found by PM activities via appropriate review, repairs, or as PM program revisions
- track compliance to the PM activities schedule evaluate program results and effectiveness
- collect failure data needed to support and update risk-based PM strategies and equipment selection for replacements and capital projects.

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## RBMI Facts

- Best-in-class distributions are <10% reactive, and ~50% predictive.
- Organizations without focus can exceed 50% in reactive work.
- The transition from Traditional MI to RBMI requires not just a strong PM program, but strong planning and scheduling discipline among other aspects of an asset-management program.

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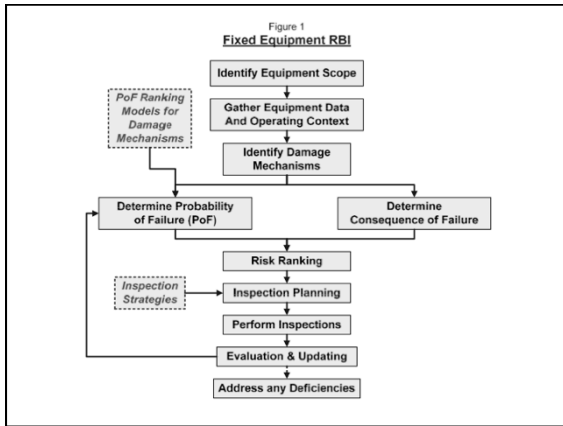
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Sample - RBI Fixed Equipment Inspection Strategy  
Pressure Vessel - Visible External Deterioration  
by External Visual Inspection

|  | Risk Rank                              |  |  |  |
|--|--|--|--|--|
|  | Low                                    | Medium                                 | Medium-High                            | High                                   |
| Minimum External Visual coverage <sup>1</sup>        | 100% External Visual                   | 100% External Visual                   | 100% External Visual                   | 100% External Visual                   |
| Maximum Interval (Yrs.), or ½ remaining life         | 15                                     | 10                                     | 10                                     | 5                                      |
| Maximum Interval allowed by jurisdiction             | Depends on Jurisdictional Requirements | Depends on Jurisdictional Requirements | Depends on Jurisdictional Requirements | Depends on Jurisdictional Requirements |
| Inspection Confidence:<br>Non-insulated<br>Insulated | Very High<br>Medium                    | Very High<br>Medium                    | Very High<br>Medium                    | Very High<br>Medium                    |

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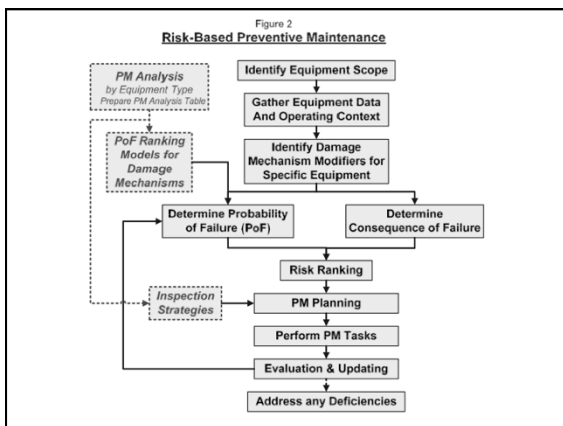
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Simplified PM Analysis Table with Sample Entries

| PM Analysis Table – Centrifugal Pump |                     |                   |                  |                       |   |
|--------------------------------------|---------------------|-------------------|------------------|-----------------------|---|
| Component or Part                    | Damage Mechanism    | Damage Cause      | Consequence Type | Time to Repair (days) | PM Types  |
| Bearing – Antifriction               | Wear                | Normal Wear       | OoS              | 1                     | Vibration Monitoring                                      |
| Bearing – Antifriction               | Wear                | Contamination     | OoS              | 1                     | Oil Analysis<br>Oil Change                                |
| Bearing – Antifriction               | Loss of Lubrication | Oil Leak          | OoS              | 1                     | Operator Rounds   |
| Bearing – Antifriction               | Excessive Vibration | Imbalance         | OoS              | 1                     | Vibration Monitoring                                      |
| Bearing – Antifriction               | Excessive Load      | Operational Error | OoS              | 1                     | Vibration Monitoring                                      |
| Mechanical Seal                      | Wear                | Normal Wear       | LoC              | 1                     | Operator Rounds   |
| Pump Casing                          | Thinning            | Corrosion         | LoC<br>OoS       | 360                   | Internal Inspection<br>Rebuild                            |
| Belt (V belt drive)                  | Wear                | Normal Wear       | OoS              | 0.5                   | UT thickness measuring<br>Inspect & Re-tension<br>Replace |

OoS – Out of Service – not available for use  
LoC – Loss of Containment – Process fluid leakage

PM Strategy - Generalized Listing for Example Only

| Component Types                                       | Damage Mechanism & Component / Part                                | Activity                    | Extent - See Activity Procedure for details                | High       | Med-High | Medium   | Low    |
|---|--|-----------------------------|--|------------|----------|----------|--------|
| Centrifugal Pump                                      | Bearing Failure  | Vibration Monitoring        | Vibration Monitoring of all Components (1)                 | 1 Hour (1) | 1 Month  | 3 Months | N/R    |
| Centrifugal Pump                                      | Coupling Failure<br>Seal Failure etc.                              | Performance Monitoring      | Check actual flow and head developed versus pump curve (2) | 1 Year     | 2 Year   | N/R      | N/R    |
| Centrifugal Pump                                      | Loss of capacity due to internal wear or corrosion                 | Change Oil                  | Change Oil in Sump   | 3 Months   | 6 Months | 1 Year   | 1 Year |
| Centrifugal Pump                                      | Oil contamination, Bearing Failure, Seal Failure                   | Re-grease                   | Inspect and add new grease                                 | 3 Months   | 6 Months | 1 Year   | 1 Year |
| Mechanical Coupling<br>Grease Lubr.<br>Cog Belt Drive | Coupling Failure<br>Belt and/or Sheave failure, High bearing loads | Re-tension or replace belts | Inspect and re-tension or replace belts (3)                | 2 Year     | 5 Year   | N/R      | N/R    |

Notes:  
1) For High Criticality continuous on-line monitoring is recommended  
2) If pumps are run in parallel add Medium criticality pumps at 2 Year's  
3) For High or Med-High Criticality with only turnaround availability for PM - Replace belts at these intervals

## The Possible Results of RBMI

- Reliability of the Process Will Improve
- PM Will Move From Reactive to Predictive
- The best in class have 30 to 50% lower maintenance costs and huge differences in on-stream performance.

## Anatomy of a Disaster What Happens When Mechanical Integrity Is Not Followed

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### BP Texas City

- BP Was Not Following the Requirements of PSM
- System Integrity Was Not Maintained
- Mechanical Integrity Was Not Followed

The Result...

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15 Killed    180 Injured    \$50.6 Million Fine

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## Mechanical Integrity Primary Goal

***"Maintain System Integrity"***



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## Process Safety Management of Highly Hazardous & Explosive Chemicals



Mechanical Integrity  
What Does it Actually Mean?

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