

Operations & Maintenance Manuals Requirements

for Bulk Plant Facilities

BY WES SHEPPARD



Safety is the name of the game in the propane industry. Keeping up with regulatory requirements can feel never-ending; that's where tips from safety experts come in. Did you know that if your propane company operates a bulk plant LP gas facility, you are required by the NFPA to have a written Operations and Maintenance Manual? This guiding document holds the key to all safety-related procedures, emergency protocol, and overall maintenance of your facility, its equipment, and its employees. Cross one thing off your compliance checklist by making sure your facility has a proper Operations & Maintenance Manual.

UNDERSTANDING CODE REQUIREMENTS

The National Fire Protection Association (NFPA) 58 Liquefied Petroleum Gas Code requires propane marketers that operate bulk facilities to have a written Operations and Maintenance Manual. This requirement applies to the operations and maintenance of any bulk plant, industrial plant, refrigerated, marine, and pipeline LP gas systems. This is required for all new and existing installations.

Requirements include mandating written procedures for safely completing tasks associated with operations and maintenance, as well as a provision that equipment owners and operators ensure that the procedures are updated, if necessary, whenever a major change occurs prior to startup of a changed system.

A facility's Operations and Maintenance Manual should be available in a common location, so that necessary site information, procedures, and manuals are easily accessible. These may be used by plant personnel (employees and contractors) for reference for support and guidance in emergency situations, plant operations (including startup and shutdown), and all maintenance activities. Record keeping associated with required inspection and maintenance activities should be available as well.

GETTING DOWN TO THE DETAILS

Chapter 14 of NFPA 58 outlines the specifics that dictate a bulk plant's Operations and Maintenance Manual, covering critical procedures for day-to-day operations, equipment maintenance, and more. To put it simply, it comes down to what the title suggests: operations and maintenance.

Operations

Operations cover the scope of any and all propane-related activities that take place in your facility. Every task must have a written procedure, including the "who, what, where, and when" of how each task is completed. These can be derived from your company's Policies and Procedures Manual, but must be expressly written independently in a separate Operations and Maintenance Manual.

Written operations document all daily facility functions, specific to your company's location, size, and services. These written operations procedures are critical from a training perspective. Your Operations and Maintenance Manual is an integral part of onboarding and should be used to train all new employees. The manual also provides guidance for existing employees. All operations training should be documented for company records to maintain compliance with NFPA 58.

Maintenance

The maintenance component of your propane company's Operations and Maintenance Manual guides specific procedures required to maintain the bulk plant facility and all of the equipment within. Just like operations, these maintenance procedures are required to be expressly written in your facility's manual. Some common examples include routine facility inspections, equipment manufacturers' instructions, and equipment maintenance for valves, compressors, pumps, and so on.

Lastly, it is critical for your Operations and Maintenance Manual to be customized to your bulk plant's location. Relevant location-specific details, like fencing or other structural site components, may need to be detailed in your Operations and Maintenance Manual. Operations and Maintenance Manuals should be updated regularly. If your plant hasn't updated its manual in a while, it likely requires a refresh.

TAKING ADVANTAGE OF THE BENEFITS

It is critical for operators of any type of bulk LP gas facility to have an Operations and Maintenance Manual in order to meet NFPA 58 requirements. But, there are several additional advantages that Operations and Maintenance Manuals have to offer propane marketers:

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1. Maintain NFPA 58 compliance

Stay compliant and avoid expensive fines.

2. Meet some OSHA requirements

Elements of your manual can help your company meet OSHA requirements, too.

3. Minimize company risk

Promote a safe working environment and uphold just-in-case emergency protocol.

4. Train your employees

Use your manual to identify training requirements for new employees.

5. Avoid expensive fines and safety hazards

A properly created, maintained, and implemented Operations and Maintenance Manual will protect your company and your employees.

So, how can your company ensure it is meeting critical safety requirements and take advantage of these additional benefits? Make sure your new or existing Operations and Maintenance Manual covers all the bases.

MEETING YOUR REQUIREMENTS

Without an Operations and Maintenance Manual, you could be charged significant fines and are more susceptible to damaging safety hazards. Make sure your existing facilities and any new facilities are outfitted with the proper manual to stay compliant. Having a proper Operations and Maintenance Manual is critical to maintain your bulk plant facility's safety program. It helps promote a safe working environment for your employees and significantly reduces risk for your company.

For more information, contact P3 Propane Safety or Wes Sheppard.

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