

## IMPORTANT NOTIFICATION – Managers should read this!

To All Anhydrous Ammonia (NH<sub>3</sub>) Distributors – October 4, 2010

The MDA will be performing NH<sub>3</sub> equipment and storage facility inspections this fall at many facilities throughout the state. Sites that have not been inspected for several years and sites with a history of violations will be inspected as a priority. Some of you may already have received a pre-inspection notification letter this spring.

You can minimize or avoid enforcement for equipment and storage facilities that are out of compliance by following the *MDA's NH<sub>3</sub> Service Status Policy*. Using the *MDA's NH<sub>3</sub> Service Status Policy* is entirely voluntary; however, **the MDA strongly recommends that you use the policy.**

**Tag** “Out of Service” tanks and equipment. The MDA recommends using durable tags for attachment to the equipment and storage facility that is “out of service. Here is an EXAMPLE of an “Out of Service” tag:

### NH<sub>3</sub> OUT OF SERVICE TAG

**Facility/Owner:**

**Date:**

**Equipment ID:**

**Authorized By:**

**Do Not Fill, Use, Or Remove This Tag Until NH<sub>3</sub> Equipment Or  
Storage Facility Is In Full Compliance.**

### OUT OF SERVICE Categories

***“Out of Service” Category – Use for NH<sub>3</sub> Equipment Only***

[Less than 10% product in tank, toolbars pressure relieved, hoses removed, tagged, and valves locked out]

***“Zero Product/Pressure” Category – Use for Both NH<sub>3</sub> Equipment & Storage Facilities***

[0 pressure/0 product, hosing, break-away coupling devices, and cold-flow unit, etc. removed]

**Be aware that tanks in either OUT OF SERVICE category must not be used to store NH<sub>3</sub>.**

**For more information:** Review the fact sheet on the other side of this notification.

## Anhydrous Ammonia Service Status Policy



On July 15, 2007 the MDA initiated two changes that will significantly impact NH<sub>3</sub> handling or storage facilities. First, MDA has increased enforcement response to violations found during inspections. Second, MDA has established three "Service Status" categories as a fair and reasonable policy for determining compliance status of NH<sub>3</sub> equipment and storage systems.

### In Service Status

Equipment and storage systems in this category are subject to full inspection and enforcement by the MDA. Equipment and storage systems In Service must always be in full compliance.

### Out of Service Status

Equipment (i.e. applicator/nurse tanks and toolbars) in this category is taken out of service in order to correct any non-compliance or for non-use/off-season placement and is subject to limited inspection and enforcement based on the following conditions:

1. This service status must be established prior to an MDA inspection;
2. Tanks must be at a liquid level of less than 10% and in adequate condition to safely hold product;
3. Tagged: Information accurate/complete/legible, listing;
  - **Out of Service Tag:**
    - firm/person owning equipment;
    - date taken out of service;
    - identification of equipment;
    - authorized name (printed) & signature.
4. Locked out valves must be secured with cable ties (i.e. metal, plastic, etc.);
5. Emptying/removal of withdrawal hose;
6. Toolbars must be emptied, pressure relieved, and the removal of non-compliant break-away coupling device/ double swivel;
7. The following items must always be in compliance:
  - Welded tank alterations/repairs, and dents (1/2+inch deep) must be examined and documented by qualified firms/persons;
  - Tank nameplate or equivalent must be legible;
  - Pressure relief valves:
    - Adequate condition with rain caps; and
    - Within the 5 year service life as verified by installation records;
  - Fittings, hosing, connections, piping, and valves/ bleeder valves meet code requirements; and
  - Hydrostats in adequate condition, with rain caps.
8. All violations corrected and tag and lock outs removed before equipment is placed back into service.

### Zero Product/Pressure

Status Equipment and storage systems in this category are normally not subject to inspection and enforcement by the MDA under the following conditions:

1. This service status must be established prior to an MDA inspection;
2. NH<sub>3</sub>/vapor pressure must be completely removed;
3. Emptying/removal of all hosing; and
4. Remove toolbars items consisting of:
  - a. Pull-away coupler/double swivel, and

- b. Cold-flow, heat exchange, heat transfer units.

**When Service Status Policy Does Not Apply**

The Service Status Policy does not apply when NH<sub>3</sub> equipment or storage system is involved in a complaint or incident. For more information, contact Ed Kaiser at [ed.kaiser@state.mn.us](mailto:ed.kaiser@state.mn.us).