

## **Anhydrous Ammonia Industry Tank Testing Survey**

CAAR | June 2016

Information will be gathered regarding two concerns to be discussed at the June 16-17, 2016, CSA B620 Committee Meeting:

## 1. Increased testing frequency under the pending B622-14 for non-spec tanks is both unnecessary and damaging to nurse tanks.

- a) Regarding the argument that <u>increased testing frequency is unnecessary</u>, CAAR is gathering information about tank failures, including:
  - Total number of tanks in the fleet, and the average number of times the tanks have been hydrotested over what period;
  - If available, what proportion of the fleet is tanks with a volume over 10,000 L;
  - The number of tank failures, either during hydrotesting or in service;
  - Specifics about each failure, including reason for failure and details about the tank such as make, capacity, and year of manufacture;
  - A history of date(s) on which the failed tank has been tested;
  - The time span between tank failure and last test date if the failure did not occur during testing;
  - Any history of damage to the tank (i.e. involved in a previous accident) that failed.
- b) Regarding the argument that <u>increased testing frequency is damaging to tanks</u>, as well as expert opinion on whether there is a need for increased testing frequency, CAAR is also asking:
  - How will hydrotesting every 3 years vs. every 5 years impact the integrity of a tank?
  - Is increased hydrotesting necessary? Why or why not?
  - Is increased external visual inspection from 2 or 3 years to annual necessary? Why or why not?
  - What is the cost per tank for conducting hydrotesting every 5 years? And visual inspection every 3 years?
  - How would that cost change if the frequency is increased to 3 years for hydrotesting and annual for visual inspection?

## 2. Phasing out non-spec (ASME spec) and TC51 spec tanks will significantly impact the ammonia industry.

CAAR is seeking to understand the impact of this change, which would currently leave TC331 as the only remaining spec, asking:

- How will this change impact the cost of replacing non-spec or TC51 tanks with TC331 tanks?
- How will it impact the function of the ammonia industry? (i.e. can TC331 effectively replace non-spec or TC51 tanks for field application?)
- Do you see any safety concerns with moving to TC331 TDUs from TC51 or ASME tanks?

## 3. Would your company be willing to file your Out of Service reports and details of any future tank failures with CAAR going forward, to re-establish a repository of tank testing results?

Please contact Delaney Ross Burtnack at CAAR if you have information to share at 204-989-9303 or delaney@caar.org.