



# IIAR Publications as RAGAGEP for Ammonia Refrigeration Systems

Session Code TU-A3

March 25, 2024

Tommy Rios, Process Safety Engineer

27th California Unified Program  
Annual Training Conference  
March 24-27, 2025



# Introduction



# PSM RAGAGEP References

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- **Title 29 §1910.119(d)(3)(ii) Process Safety Information**
  - The employer shall document that equipment complies with [recognized and generally accepted good engineering practices](#).
- **Title 29 §1910.119(j)(4)(ii) Mechanical Integrity**
  - Inspection and testing procedures shall follow [recognized and generally accepted good engineering practices](#).
- **Title 29 §1910.119(j)(4)(iii) Mechanical Integrity**
  - 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.

# RAGAGEP Citations

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Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.119(d)(3)(ii): The employer did not document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP's).

A. The employer failed to document compliance with **RAGAGEP, such as IIAR Bulletin 114** "Identification of Ammonia Refrigeration Piping and System Components" Section 4.1 "Piping Markers" and Section 5.0 (a-d) "Marker Location", March 2014, as the employer failed to mark and/or label ammonia refrigeration equipment, including:

B. Failure to document compliance with **RAGAGEP, such as IIAR Bulletin 110** "Guidelines for: Start-up, Inspection and Maintenance of Ammonia Mechanical Refrigerating Systems" Section 6.6 Valves and Sensing Devices Subsection 6.6.1 Shut-off Valves, as the employer failed to change out ammonia refrigeration system safety relief valves prior to their 5 year due dates from the date of installation,

# IIAR Bulletins – Historical RAGAGEP

Bulletin No. 114 March 2014

*Guidelines for:*

Identification of  
Ammonia Refrigeration  
Piping and  
System Components

International Institute of  
Ammonia Refrigeration  
**iiar**

Bulletin No. 109 10/97

*Guidelines for:*

IIAR Minimum  
Safety Criteria for  
a Safe Ammonia  
Refrigeration  
System

International Institute of  
Ammonia Refrigeration  
**iiar**

Bulletin No. 110 3/93

*Guidelines for:*

Start-up, Inspection  
and Maintenance of  
Ammonia Mechanical  
Refrigerating Systems

International Institute of  
Ammonia Refrigeration  
**iiar**

# IIAR Literature - Bulletins

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- IIAR Bulletin No. 110 §6.4.2 [emphasis mine]:
- *The system should be checked regularly for the presence of non-condensable gases which should be purged as necessary from the receiver(s) and/or condenser(s), preferably into a noncondensable gas remover or purger but alternatively into water. Where an automatic purger is fitted, its correct operation should be monitored. If there is a large accumulation of noncondensable gases the reason should be investigated and the cause should be corrected.*

# Ammonia Refrigeration Code Organizations

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# IIAR and Model Codes

- **2018 IFC §605.1.2 Ammonia refrigeration.**  
Refrigeration systems using ammonia refrigerant and the buildings in which such systems are installed shall comply with **IIAR-2** for system design and installation and **IIAR-7** for operating procedures. Decommissioning of ammonia refrigeration systems shall comply with **IIAR-8**.
- **2018 NFPA 1 §53.1.3 Reference Codes and Standards.**  
Refrigeration systems shall be in accordance with ASHRAE 15 and the mechanical code. Refrigeration systems using ammonia as a refrigerant shall also comply with **ANSI/IIAR 2**, Standard for Equipment, Design and Installation of Closed-Circuit Ammonia Mechanical Refrigerating Systems.





# IIAR and Model Codes

- **2018 UMC §1102.2 Ammonia Refrigeration Systems.** Refrigeration systems using ammonia as the refrigerant shall comply with **IIAR 2**, **IIAR 3**, **IIAR 4** and **IIAR 5**. and shall not be required to comply with this chapter.
- **2021 IMC §1101.1.2 Ammonia refrigerant.** Refrigeration systems using ammonia as the refrigerant shall comply with **IIAR 2**, **IIAR 3**, **IIAR 4** and **IIAR 5**. and shall not be required to comply with this chapter.

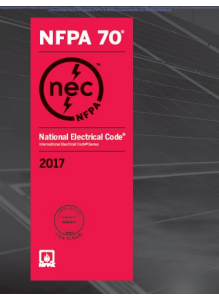
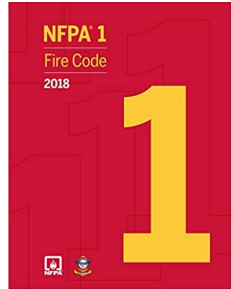


# IIAR and Model Codes

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- **ANSI/ASHRAE 15-2019 §2.3** This standard shall not apply to refrigeration systems using ammonia (R-717) as the refrigerant.
  - **Informative Note:** See [ANSI/IIAR 2](#) for systems using ammonia (R-717).

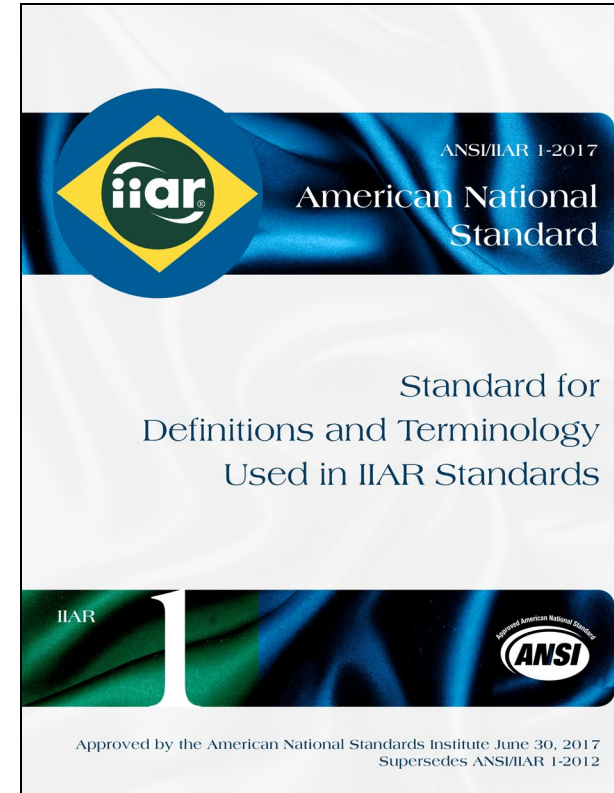
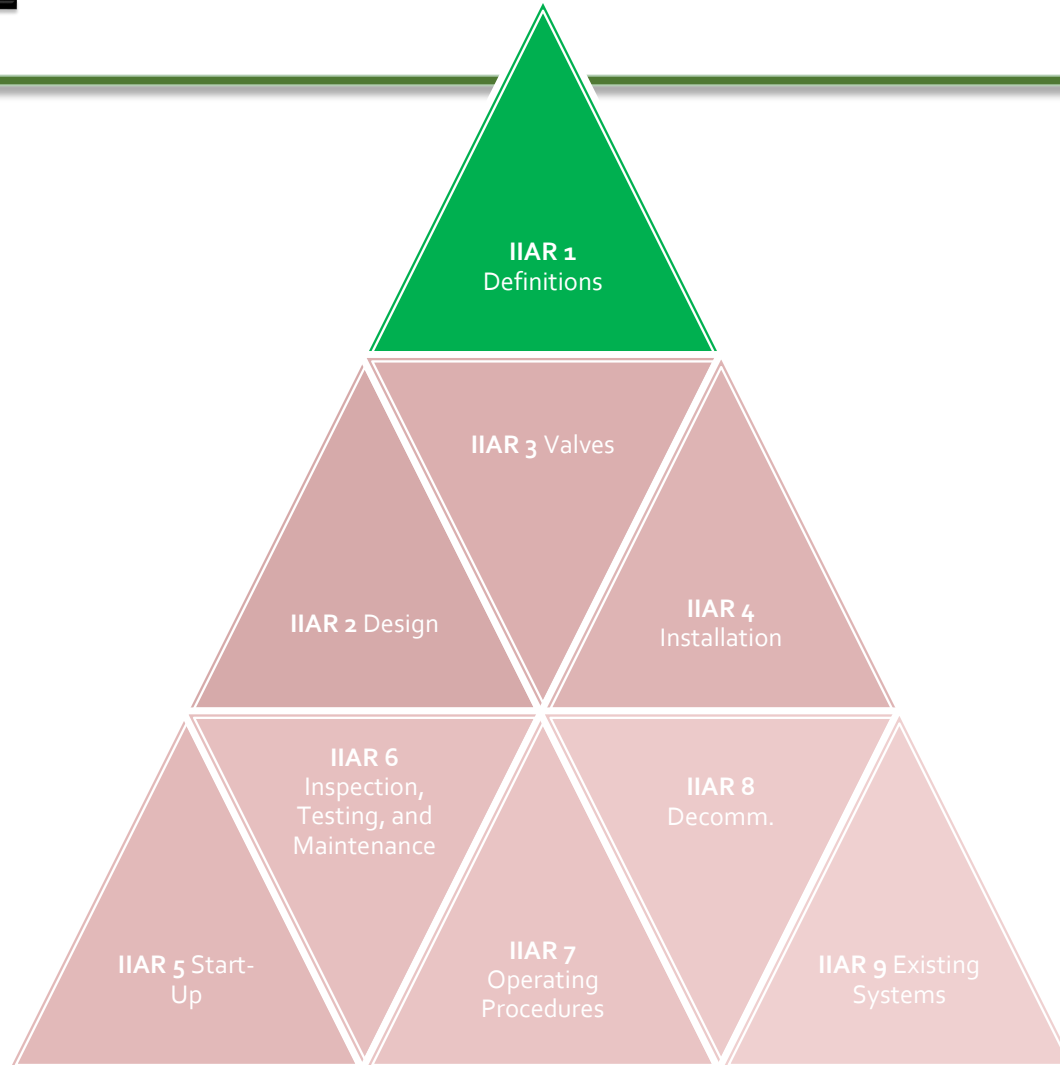




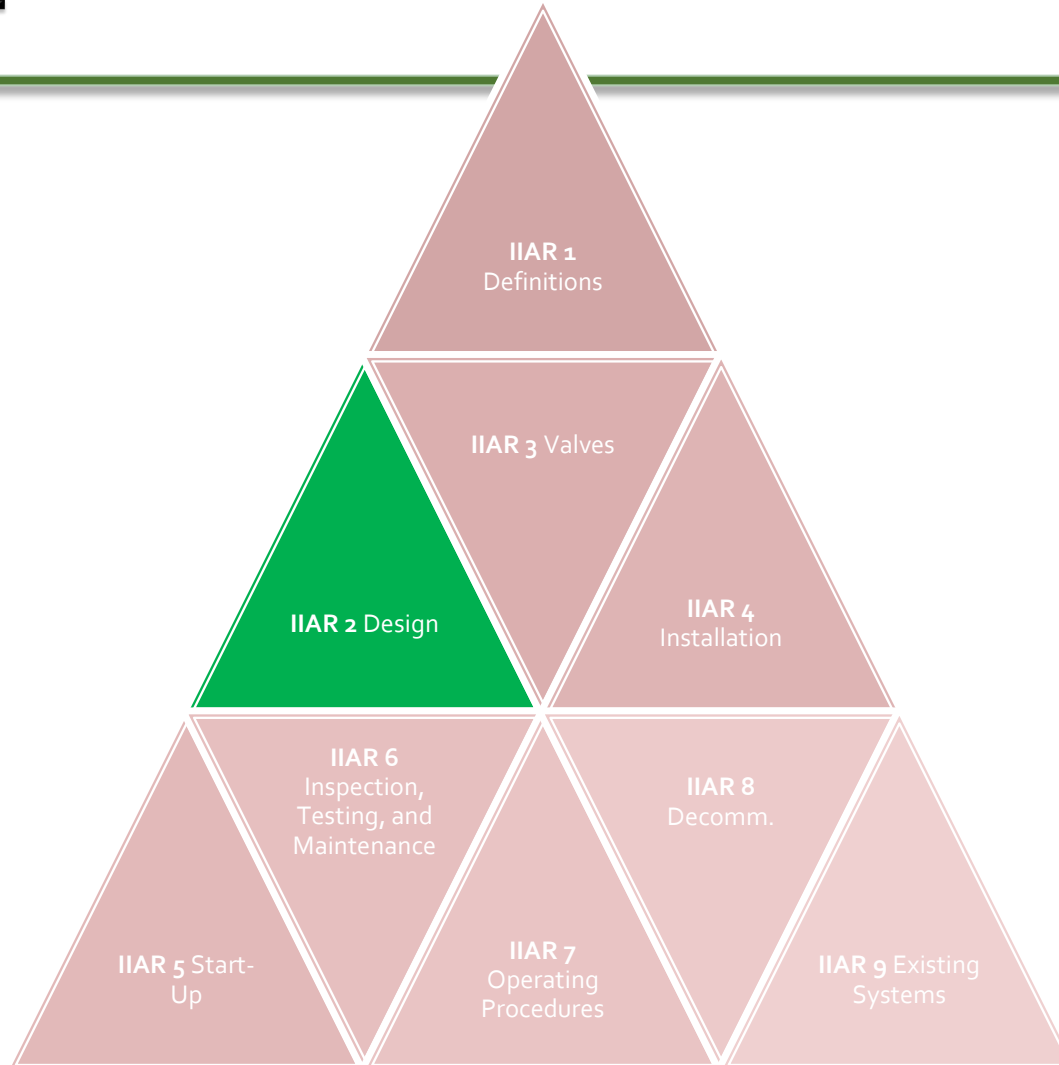
27th California Unified Program  
Annual Training Conference  
March 24-27, 2025



# IIAR 1



# IIAR 2



# IIAR Standard 2

- ANSI/IIAR 2 Standard for Safe Design of Closed-Circuit Ammonia Refrigeration Systems



# Overview

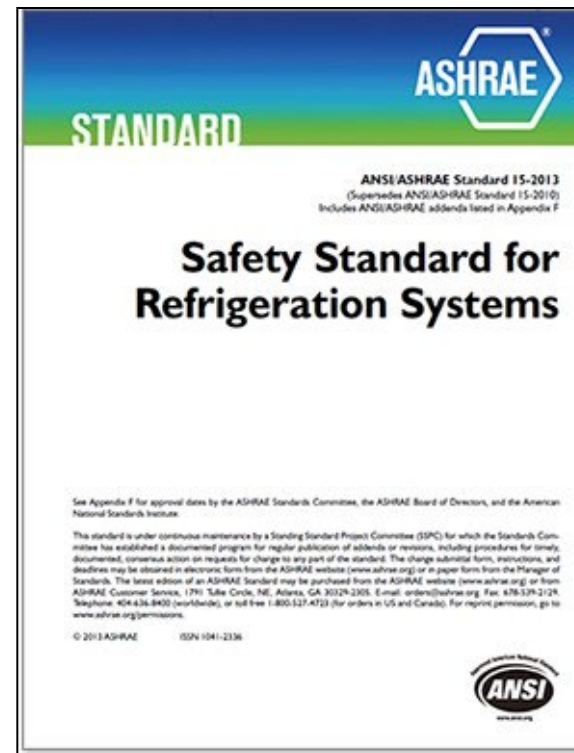
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- **Part 1** – General (Chapters 1-3)
- **Part 2** – Design and Installation Considerations (Chapters 4-7)
- **Part 3** – Equipment (Chapters 8-17)
- **Part 4** – Appendices (Appendix A – Appendix N)

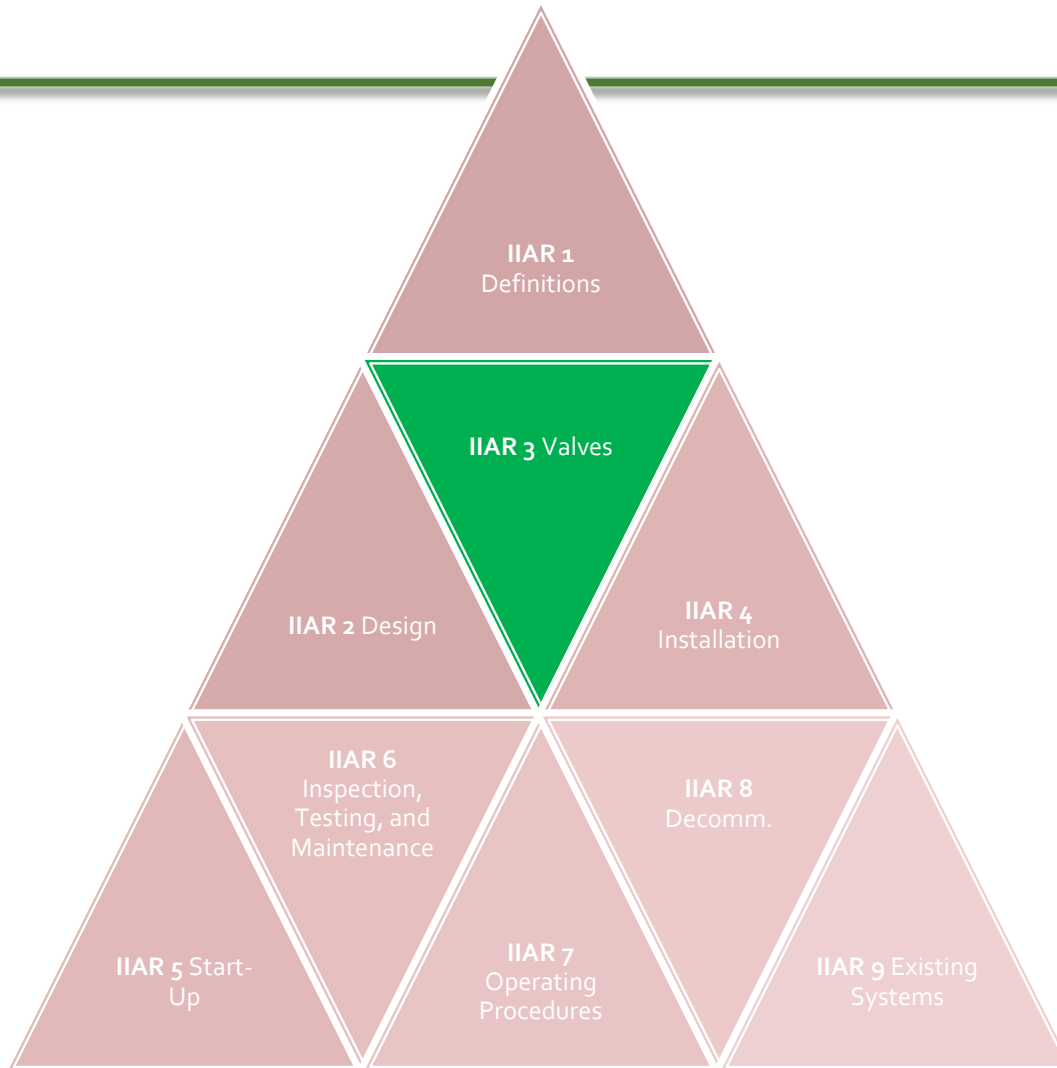




# IIAR 2 vs. ASHRAE 15

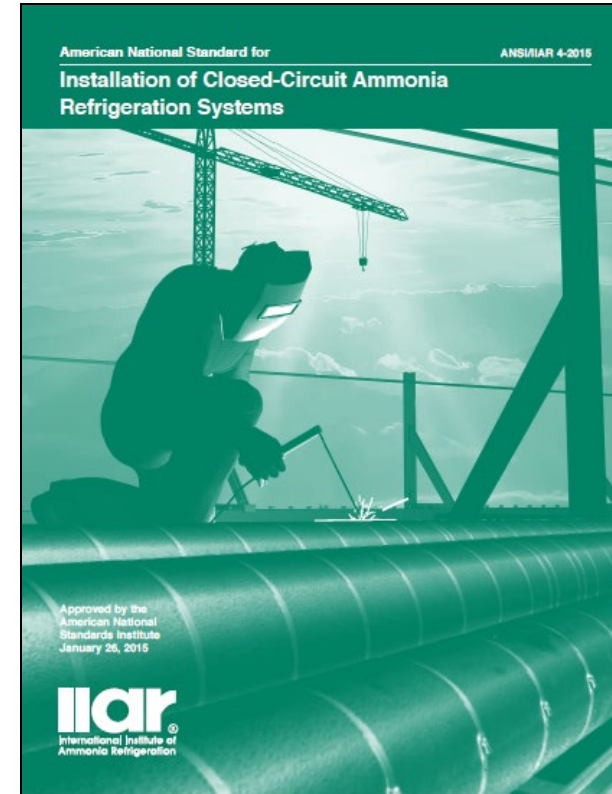
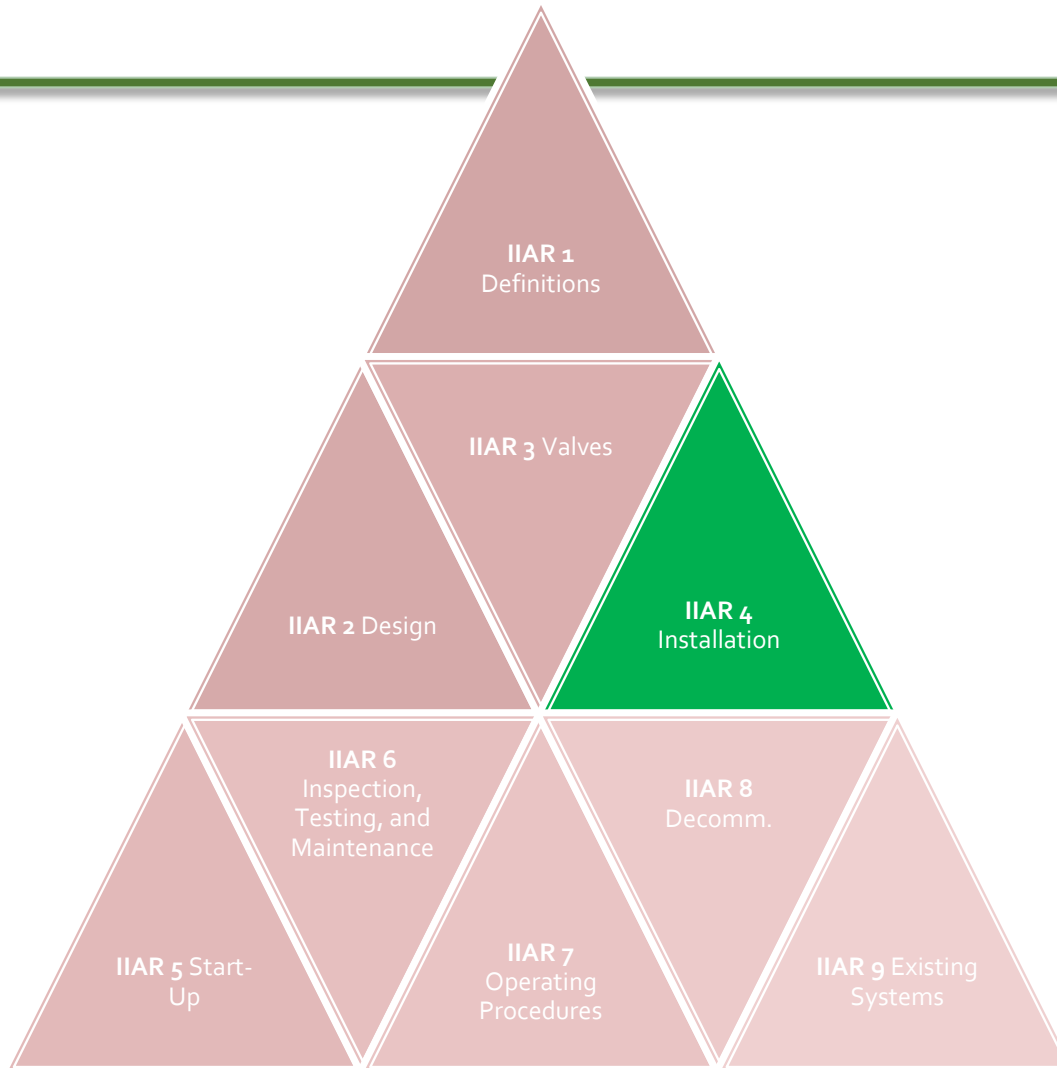


# IIAR 3





# IIAR 4



|           | <b>Compressors</b>            |                | <b>LP Side Components Including Vessels, Heat Exchangers, Evaporators, Pumps &amp; Piping</b> | <b>Hot Gas Defrost Evaporators &amp; Piping</b> | <b>HP Side Components Including Valves, Sensing Devices, Heat Exchangers, Condensers, Pumps &amp; Piping</b> |                           |
|-----------|-------------------------------|----------------|---|---|--|---------------------------|
|           | <i>LP Side &amp; Boosters</i> | <i>HP Side</i> |   |   | <i>Water-cooled Systems</i>  | <i>Air-cooled Systems</i> |
| Psig      | 250                           | 300            | 250   | 250   | 250  | 300                       |
| kPa gauge | 1724                          | 2069           | 1724  | 1724  | 1724   | 2069                      |

# IIAR 5



▼ Category 1 - Pre-Charging: To be completed before ammonia is brought onsite

Delete

Category # 1

Category Name Pre-Charging: To be completed before ammonia is brought onsite

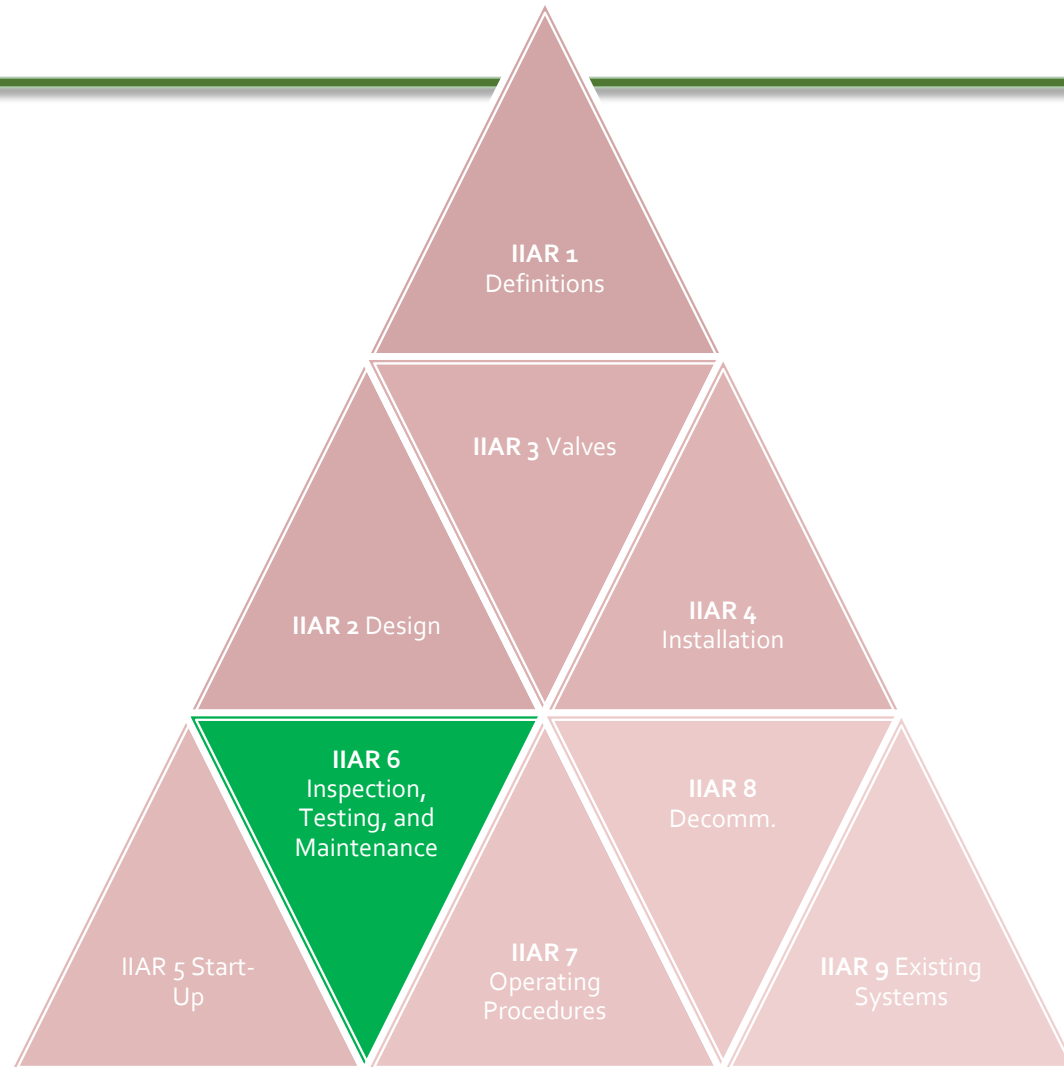
Add new question

Toggle Unanswered

Show Questions

- |                          |   |     |    |     |
|--------------------------|---|-----|----|-----|
| <input type="checkbox"/> | 1. Has a startup team been organized to perform the startup of the new system or additions/modifications to an existing system? [ANSI/IIAR 5-2019 §5.1]         | YES | NO | N/A |
| <input type="checkbox"/> | 2. Has a startup plan been prepared? [ANSI/IIAR 5-2019 §5.2]  | YES | NO | N/A |
| <input type="checkbox"/> | 3. Has all system documentation from the planning, design, and installation phases of the project been assembled and readily available? [ANSI/IIAR 5-2019 §5.3] | YES | NO | N/A |
| <input type="checkbox"/> | 4. For new facilities, has a Hazard Review or Process Hazard Analysis been performed? [ANSI/IIAR 5-2019 §5.4.1-5.4.2, 5.11.4]                                   | YES | NO | N/A |
| <input type="checkbox"/> | 5. Have all Hazard Review or Process Hazard Analysis recommendations requiring closure prior to start-up been resolved? [ANSI/IIAR 5-2019 §5.4.1]               | YES | NO | N/A |

# IIAR 6



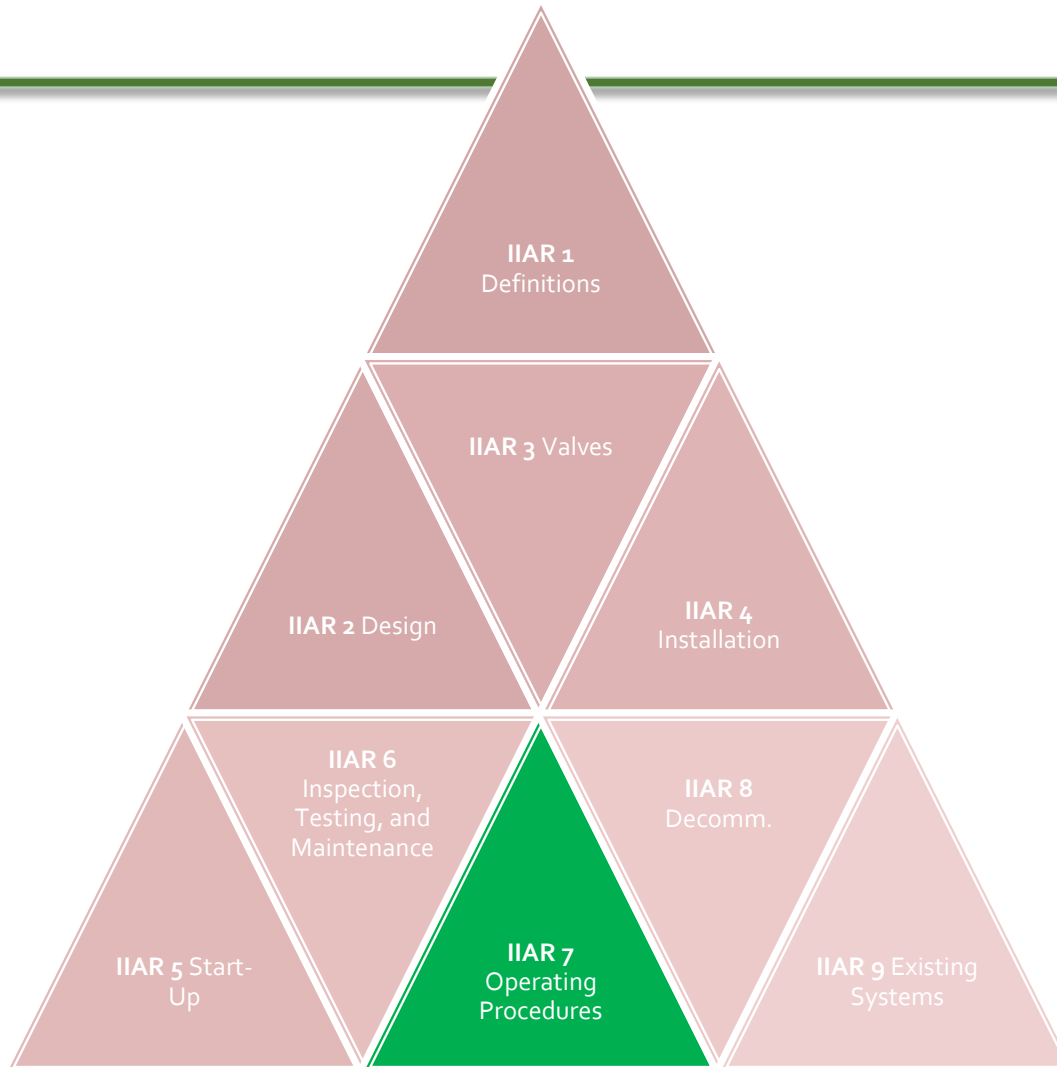




# Frequencies

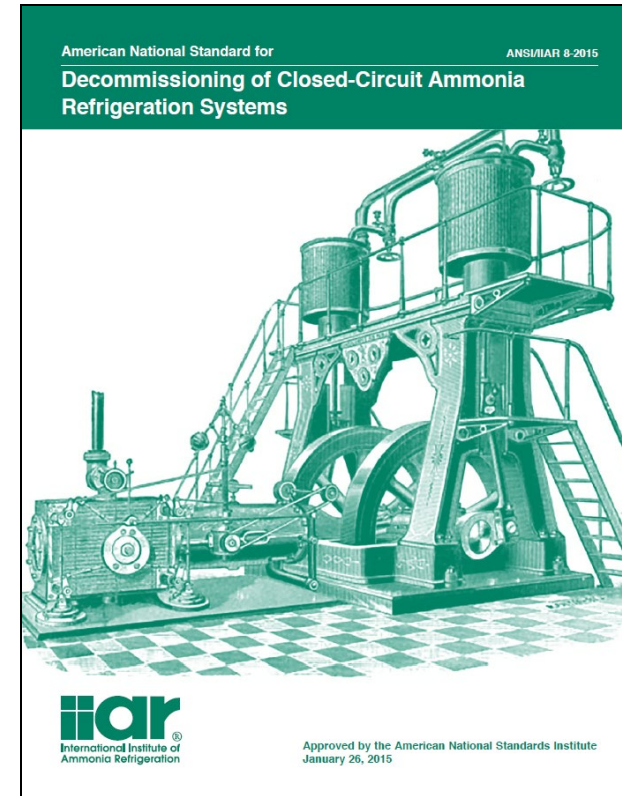
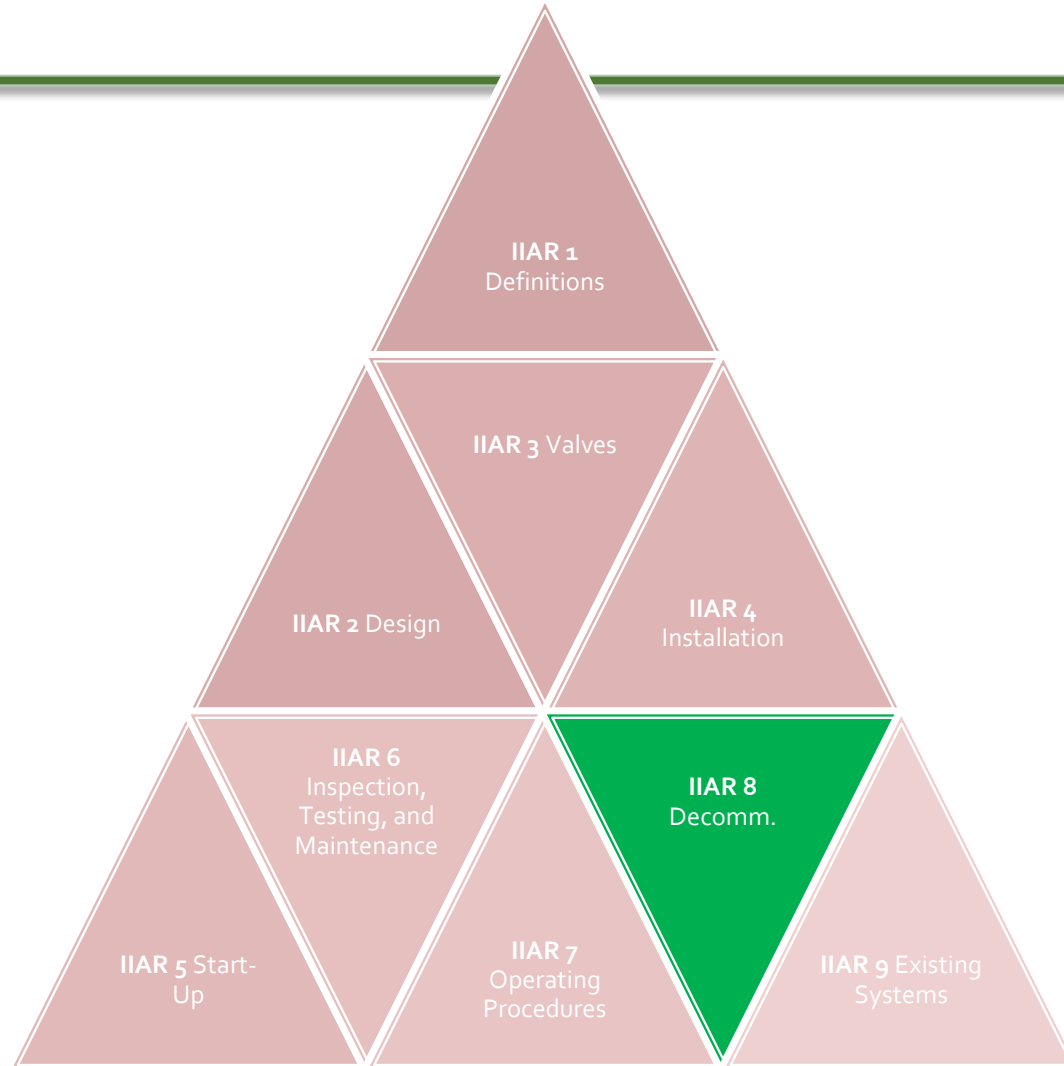
- D – Daily
- W – Weekly
- M – Monthly
- Q – Quarterly
- S – Semiannual
- A – Annual
- B - Biennial,
- 3 - Three Years
- 5 - Five Years
- 10 - Ten Years
- WA - Where Applicable
- NA - Not Applicable
- NR - Not Required

# IIAR 7





# IIAR 8



▼ Category 1 - Preparation

Delete

Category # 1

Category Name Preparation

Add new question

Toggle Unanswered

Show Questions

+

1. Has the reason or reasons that the system or parts there-of are to be decommissioned been clearly stated and found adequate? [ANSI/IIAR 8-2015 §5.1.1.1]

YES

NO

N/A

+

2. Has a competent person been designated for coordination of all decommissioning activities? [ANSI/IIAR 8-2015 §5.1.1.2]

YES

NO

N/A

+

3. Has an initial plan been developed for the decommissioning activities? [ANSI/IIAR 8-2015 §5.1.1]

YES

NO

N/A

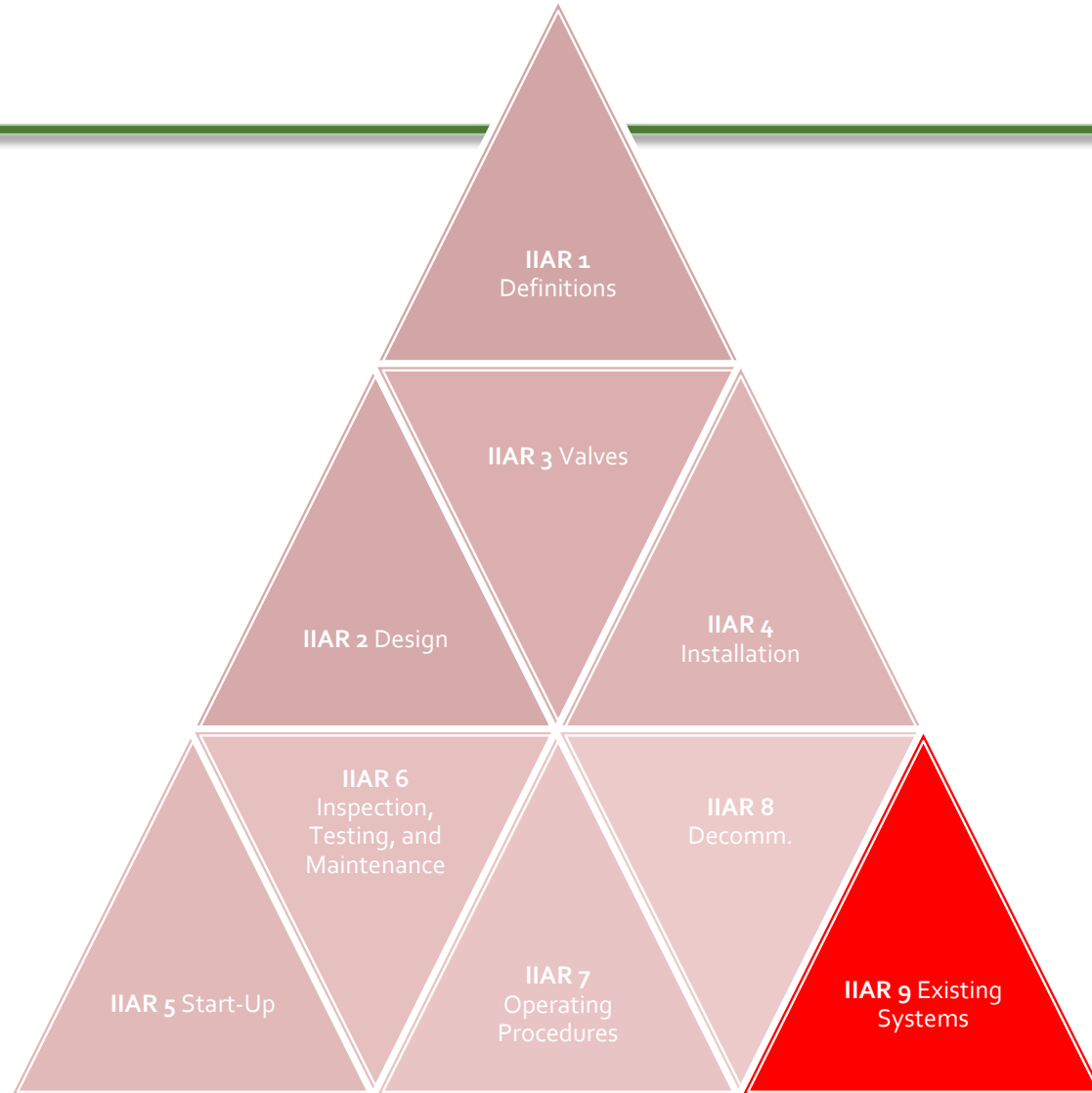
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4. Have documents relevant to the decommissioning activities been obtained and made available to all necessary personnel involved in decommissioning? [ANSI/IIAR 8-2015 §5.2.1]

YES

NO

N/A



# Grandfathering

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## Scenario:

- Cold Storage Facility was built in 1969 in accordance with the 1967 UMC.

U.M.C. STANDARD 15-1-67

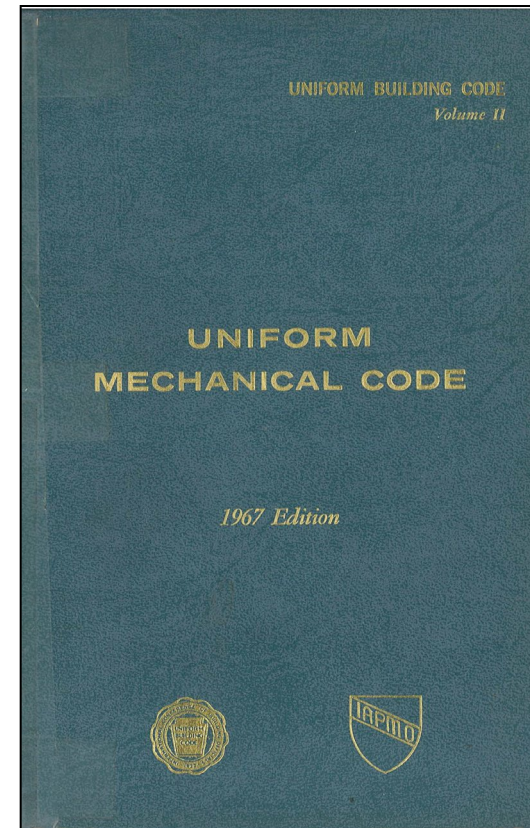
UNIFORM MECHANICAL CODE

UNIFORM MECHANICAL CODE STANDARD NO. 15-1-67

MECHANICAL REFRIGERATION

Based on Standard B9.1-1964 of the United States of America Standards Institute

See Section 1501, Uniform Mechanical Code

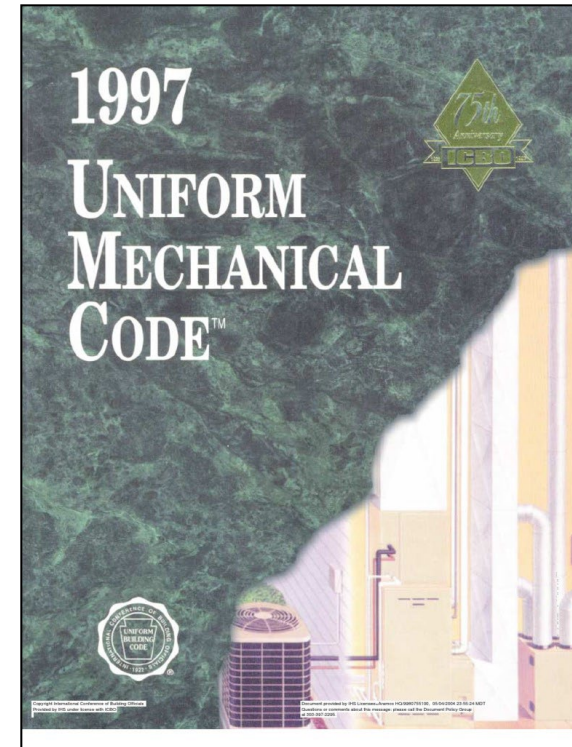


# Grandfathering

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## Scenario:

- In 1998, modifications were made to the machinery room
  - New compressor installed
  - AHJ required ventilation and detection to be upgraded
  - All changes performed in accordance with 1997 UMC

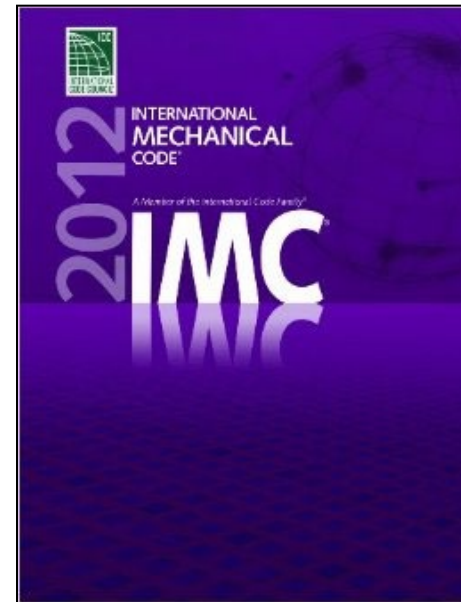




# Grandfathering

## Scenario:

- In 2014, facility hired a contractor to construct a new cold storage room
  - No machinery room modifications required
  - New room must comply with 2012 IMC and ANSI/IIAR 2-2008 Addendum B
  - Facility elected to upgrade detection for entire facility to comply with 2012 IMC



# Poll Question 2

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- In the example given, which RAGAGEP is applicable at the facility?
  - 1967 UMC
  - 1997 UMC
  - 2012 IMC and ANSI/IIAR 2-2008 Addendum B
  - All of the above

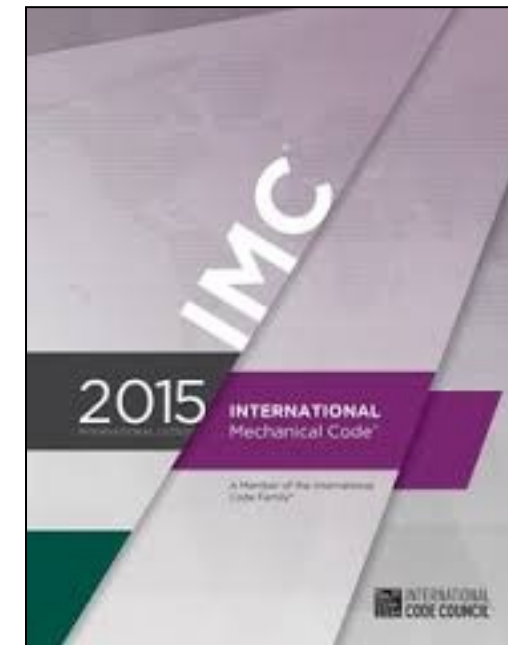
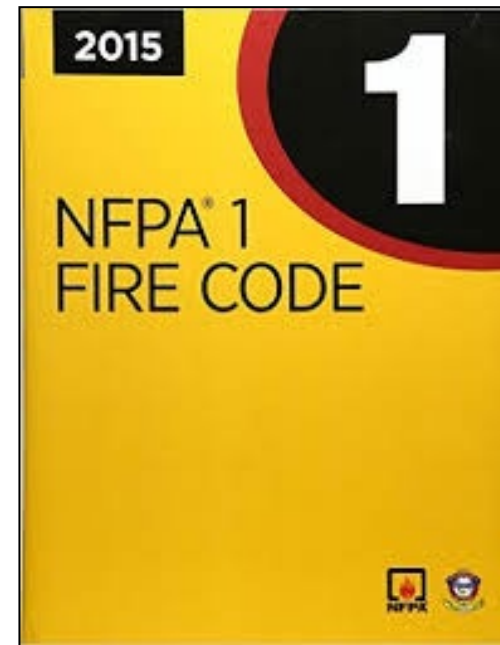
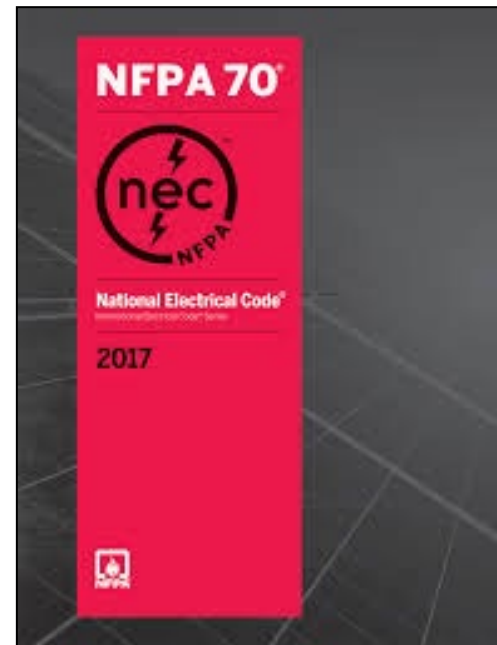
# Grandfathering

- What RAGAGEP is applicable at the facility?



# Consideration of New RAGAGEPs

When a new code/standard is released, what do I do?



The image shows an industrial ammonia refrigeration system. It features a complex network of yellow and red pipes with various valves and gauges. The system is mounted on a multi-level steel structure with railings. A large green coil of hose is visible on the lower level. The background shows a clear blue sky and some industrial buildings in the distance.

# ANSI/IIAR 9-2020

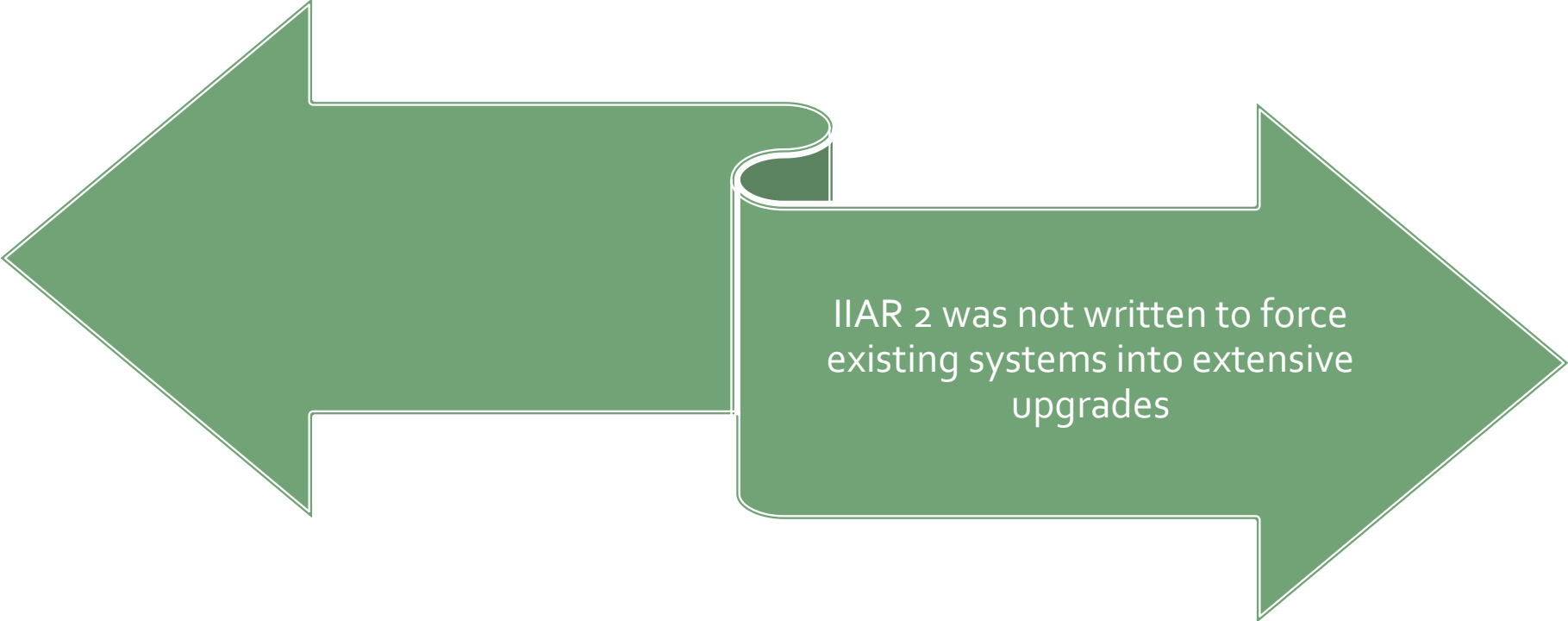
Standard for Minimum System Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems

# Standard 9

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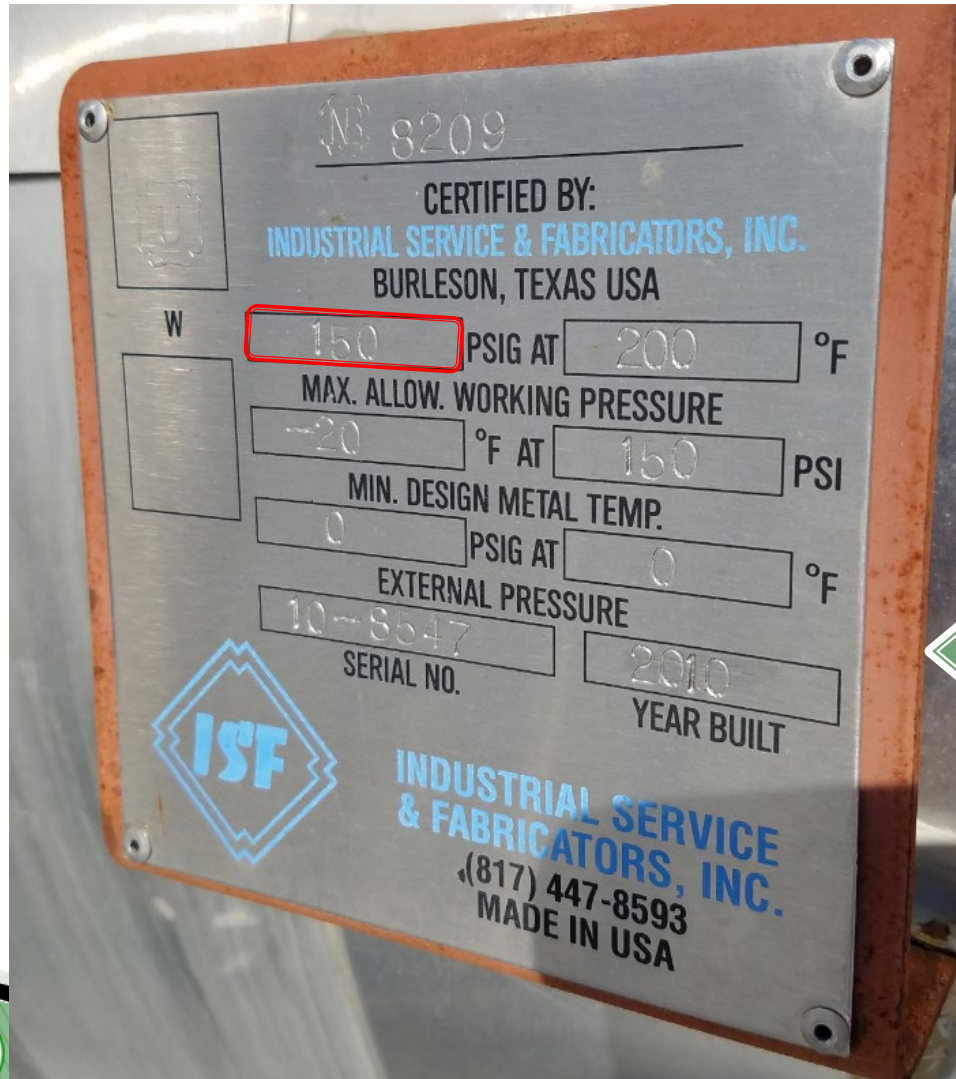


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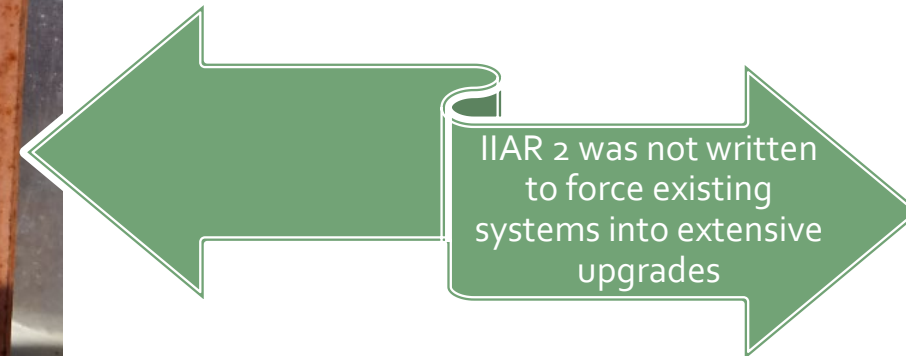


IIAR 2 was not written to force existing systems into extensive upgrades

# ANSI/IIAR 2-2014 Addendum A §5.5.3(1)



- 1. **Low-pressure side:** 10°F (5.6°C) higher than the 1% ambient dry-bulb temperature for the installation location or 114.6°F (45.9°C), whichever is greater. **The minimum design pressure shall be 250 psig** (1,724 kPa).



IIAR 2 was not written to force existing systems into extensive upgrades



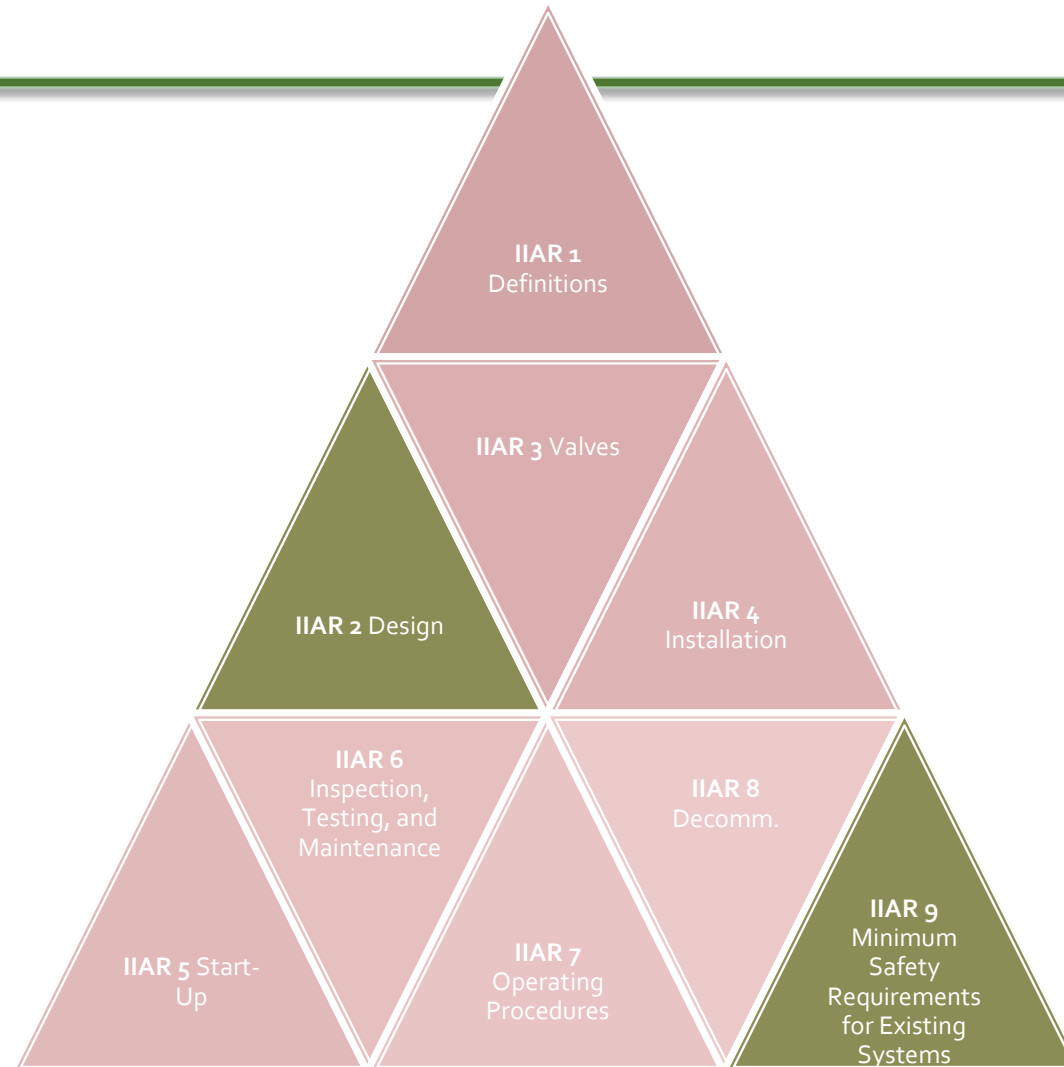
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Existing systems have risks that could impact employees and the community at large

IIAR 2 was not written to force existing systems into extensive upgrades

# Standard 9

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# IIAR 9

## Normative Chapters

## Informative Appendices

1 – Purpose

2 – Definitions

3 – References

4 – Equipment and System  
Documentation

5 – Inspection, Testing, and Maintenance

6 – System and Equipment Operation

7 – Minimum System Safety  
Requirements Applicable to All Systems

8 – Minimum System Safety Evaluation  
Methodology

A – Explanatory Materials

B – Equipment/System Component  
Documentation

C – Additional Equipment/System  
Component Documentation

D – Machinery Room Signs

E – Example of a Minimum System Safety  
Evaluation

F – References and Sources of References

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The image shows an industrial facility with a complex network of yellow and red pipes. A large, grey, rectangular structure is the central focus, surrounded by a brown steel framework with walkways and railings. A yellow label with the text 'EC2' is visible on the grey structure. The background shows a clear blue sky and some distant industrial buildings.

# ANSI/IIAR 9-2020

Chapters 1-6

# IIAR 9

## Normative Chapters

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# Chapter 1: Purpose

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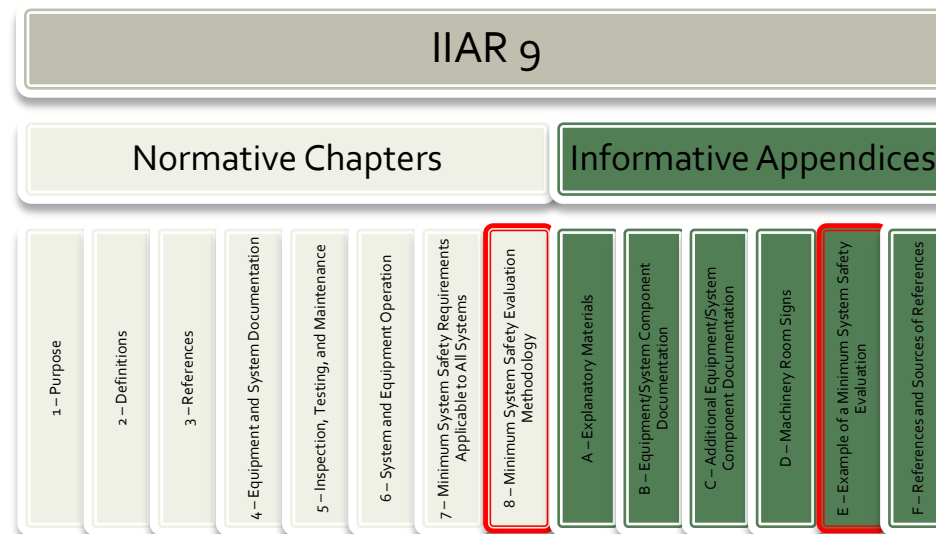
- §1.1 Purpose
  - §1.1.1 This standard provides the minimum safety requirements for existing closed-circuit ammonia refrigeration systems.



# Chapter 1: Scope

## ➤ §1.2 Scope

- §1.2.1 This standard provides a method to determine if existing stationary closed-circuit refrigeration systems using ammonia as a refrigerant comply with minimum system safety requirements.



# Chapter 1: Scope

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- §1.2 Scope
  - §1.2.2 This standard provides a method for existing stationary closed-circuit refrigeration systems using ammonia as a refrigerant to determine and document that existing equipment designed and constructed in accordance with codes, standards, or practices that are no longer in general use is inspected, tested, maintained, and operating in a safe manner.
  - ***1910.119(d)(3)(iii) For existing equipment designed and constructed in accordance with codes, standards, or practices that are no longer in general use, the employer shall determine and document that the equipment is designed, maintained, inspected, tested, and operating in a safe manner.***

# Chapter 1: Scope

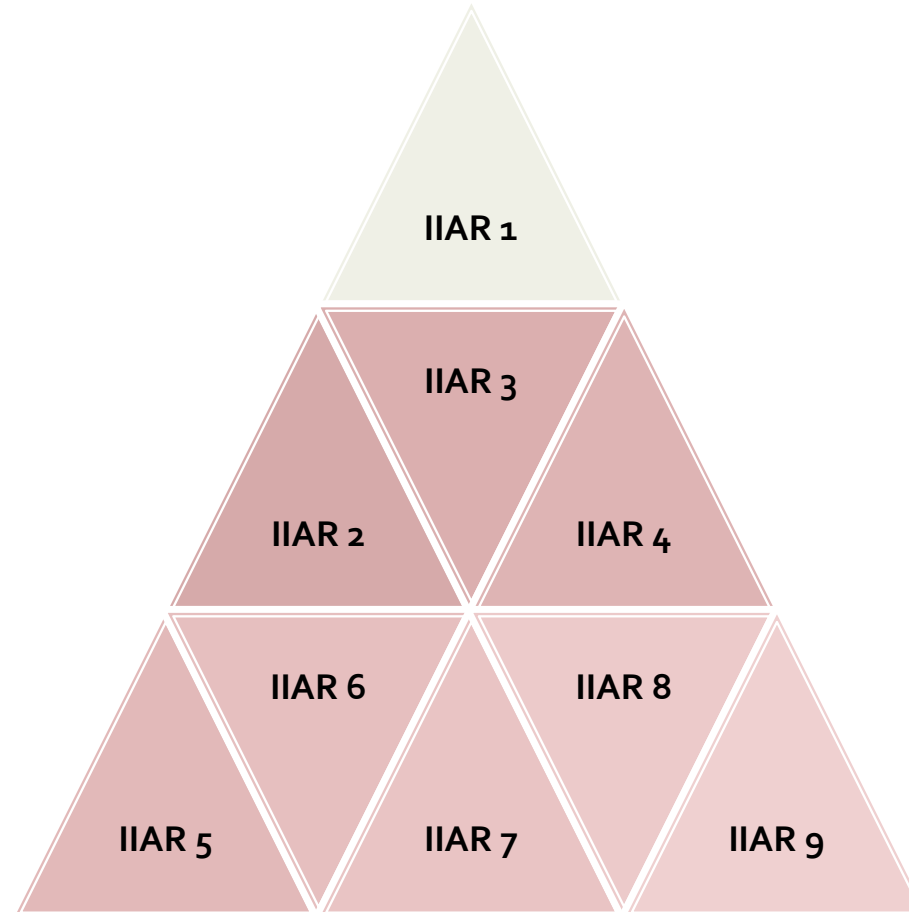
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- §1.2 Scope
  - §1.2.3 This standard does not apply to non-industrial occupancies and ammonia absorption systems.

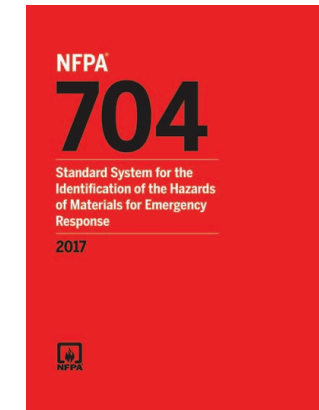
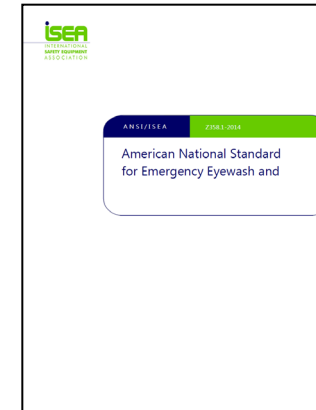
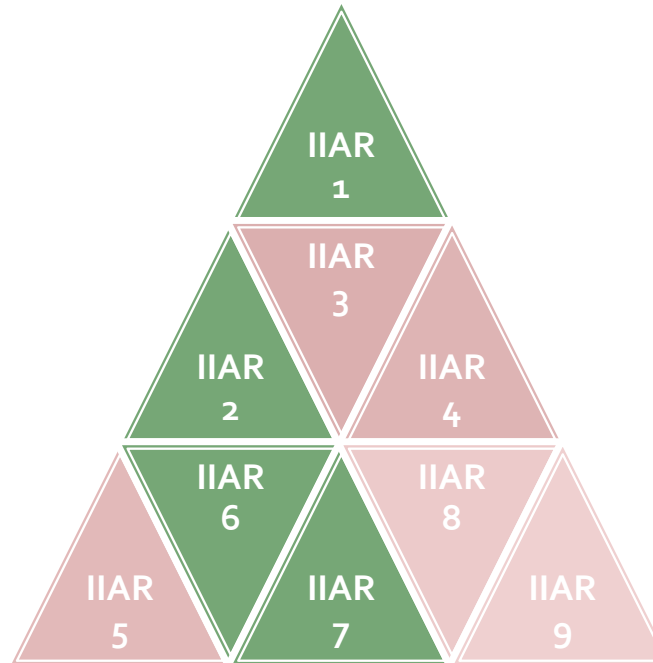
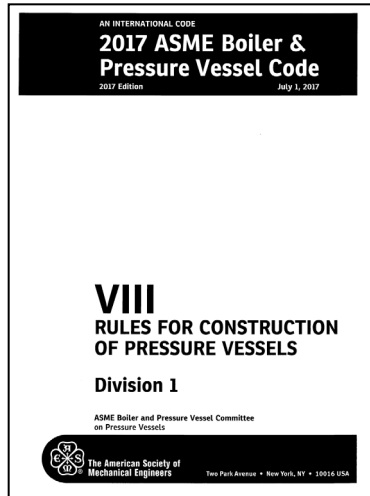


# Chapter 2: Definitions

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# Chapter 3: Normative References



# IIAR 9

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E – Example of a Minimum System Safety  
Evaluation

F – References and Sources of References

# Appendix F: References and Sources of References

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- F.1 Informative References
  - F.1.1 Environmental Protection Agency (EPA): EPA Alert 550-F-1999, August 2001.
  - F.1.2 American National Standards Institute: ANSI Z535.2 (2011), American National Standard for Environmental and Facility Safety Signs.
- F.2 Sources of References
  - F.2.1 American National Standards Institute (ANSI)  
11 West 42nd Street  
New York, NY 10036, USA  
[www.ansi.org](http://www.ansi.org)
  - F.2.2 International Institute of Ammonia Refrigeration (IIAR)  
1001 North Fairfax Street  
Suite 503  
Alexandria, VA 22314, USA  
[www.iiar.org](http://www.iiar.org)
  - F.2.3 Occupational Safety and Health Administration (OSHA)  
United States Department of Labor  
Washington, DC 20210, USA  
[www.osha.gov](http://www.osha.gov)  
[www.dol.gov](http://www.dol.gov)  
[www.osha.gov/tdc](http://www.osha.gov/tdc)
  - F.2.4 United States Environmental Protection Agency (EPA)  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460, USA  
[www.epa.gov](http://www.epa.gov)

# IIAR 9

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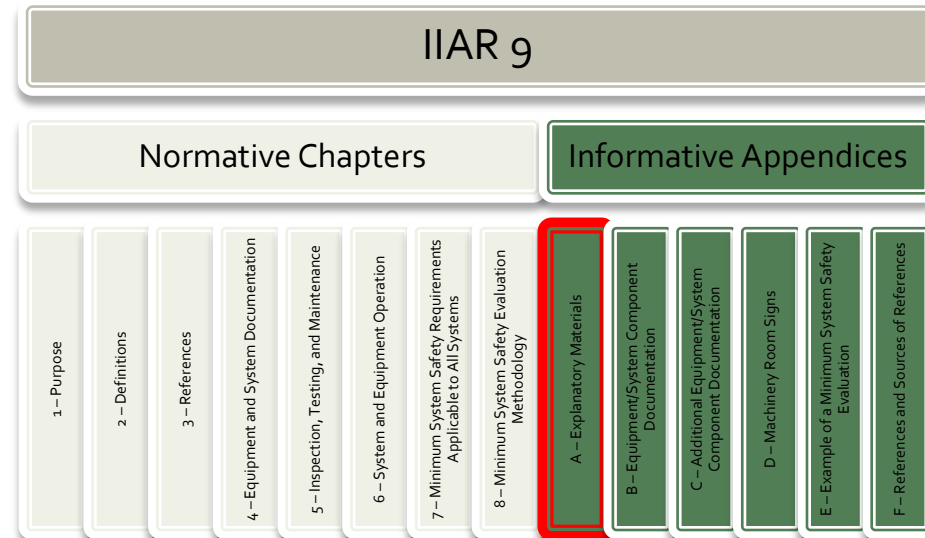
F – References and Sources of References



# Chapter 4: Equipment and System Components Documentation

§4.1 The following equipment documentation and system component documentation shall be obtained and on-file at the facility.

- §4.1.1 \* Manufacturer Data Report(s)
- §4.1.2 \* Materials of Construction
- §4.1.3 \* Manufacturer Documentation for System Components



# Appendix A: Explanatory Material

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- A.4.1.2 Materials of construction refers specifically to the documentation showing that the equipment and materials used in the construction of an ammonia refrigeration system are suitable for ammonia refrigerant at the corresponding temperature and pressure that the components will be subjected to. The materials of construction for equipment in the ammonia refrigeration system could be documented utilizing the following items:
  - equipment specifications;
  - design specifications;
  - equipment,
  - valve and instrument tables;
  - equipment drawings;
  - manufacturer manuals; etc.

Appendix C provides a listing of additional equipment/system component documentation that is not required by this standard to be obtained to demonstrate compliance; however, this information could be beneficial in the development of the Preventative Maintenance program and/or the Standard Operating Procedures.

# Appendix A: Explanatory Material

---

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## Appendix C: Additional Equipment/System Component Documentation

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This appendix is not part of this standard. It is merely informative and does not contain requirement necessary for conformance to the standard. It has not been processed according to the ANSI requirements for the standard and may contain material that has not been subject to public review or a consensus process.

The purpose of this informative appendix is to provide a listing of additional equipment system component documentation that is not required by this standard to be obtained to demonstrate compliance with minimum system safety requirements. The documentation listed within this informative appendix could be beneficial in the development of the Preventative Maintenance Program and Standard Operating Procedures. There may be situations where the information below is not available (i.e. natural disaster; manufacturer out of business, etc.) for these situations, it is recommended that the steps taken to obtain this information be documented.

## Appendix C: Additional Equipment/System Component Documentation

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➤ **C.1 Compressor**

- C.1.1 Certified/Dimensional Drawing(s) for:
  - C.1.1.1 Oil separator, and
  - C.1.1.2 Oil cooler (if applicable).
- C.1.2 General arrangement/dimensional drawing(s) for compressor packages.
- C.1.3 Design pressure and temperature.
- C.1.4 Equipment ratings.
- C.1.5 Operating parameters.
- C.1.6 Alarm parameters (default and cutout).
- C.1.7 Installation, Operation, Service, and Maintenance Manual(s).

➤ **C.2 Condenser**

- C.2.1 Design pressure and temperature
- C.2.2 Equipment ratings.
- C.2.3 Operating parameters.
- C.2.4 Manufacturer dimensional drawing(s).
- C.2.5 Installation, Operation, Service, and Maintenance Manual(s).

➤ **C.3 Evaporators**

- C.3.1 Design pressure and temperature.
- C.3.2 Equipment ratings.
- C.3.3 Operating parameters.
- C.3.4 Manufacturer dimensional drawing(s).
- C.3.5 Installation, Operation, Service, and Maintenance Manual(s).

➤ **C.4 Auto Purger**

- C.4.1 Design pressure and temperature.
- C.4.2 Equipment ratings.
- C.4.3 Operating parameters.
- C.4.4 Manufacturer dimensional drawing(s).
- C.4.5 Installation, Operation, Service, and Maintenance Manual(s).

➤ **C.5 Pump**

- C.5.1 Design pressure and temperature.
- C.5.2 Equipment ratings.
- C.5.3 Operating parameters.
- C.5.4 Manufacturer dimensional drawing(s).
- C.5.5 Pump curve(s).
- C.5.6 Installation, Operation, Service, and Maintenance Manual(s).

➤ **C.6 Pressure Vessel**

- C.6.1 Certified/Dimensional Drawing(s).

➤ **C.7 Heat Exchanger**

- C.7.1 Manufacturer performance and design basis.
- C.7.2 Manufacturer dimensional drawing(s).
- C.7.3 Installation, Operation, Service, and Maintenance Manual(s).

➤ **C.8 Piping**

- C.8.1 Mill Test Report(s) – piping manufacturer's test certificate.
- C.8.2 Pressure testing report(s).

➤ **C.9 Instrumentation and Controls**

- C.9.1 Controls description(s).

➤ **C.10 Ammonia Detection**

- C.10.1 Controller Installation, Operation, Service, and Maintenance Manual.
- C.10.2 Sensor Installation, Operation, Service, and Maintenance Manual.
- C.10.3 Portable Gas Detection Operation, Service, and Maintenance Manual.
- C.10.4 Electrical Drawings.
- C.10.5 Layout Drawings

➤ **C.11 Machinery Room Ventilation**

- C.11.1 Exhaust Ventilation Fan(s).
  - C.11.1.1 Fan curve(s).
  - C.11.1.2 Fan performance data.
  - C.11.1.3 Installation, Operation, Service, and Maintenance Manual(s).
- C.11.2 Intake Ventilation Fan(s).
  - C.11.2.1 Fan curve(s).
  - C.11.2.2 Fan performance data.
  - C.11.2.3 Installation, Operation, Service, and Maintenance Manual(s).
- C.11.3 Intake Louver(s).
  - C.11.3.1 Installation, Operation, Service, and Maintenance Manual(s).
- C.11.4 Layout Drawings.
- C.11.5 Electrical Drawings.
- C.11.6 Ventilation Manual Control Switch – Installation, Operation, Service, and Maintenance Manual(s).

- C.11.7 Ventilation System Failure Device – Installation, Operation, Service, and Maintenance Manual(s).

➤ **C.12 Emergency Alarms**

- C.12.1 Emergency Shut-down Switch(s).
  - C.12.1.1 Installation, Operation, Service, and Maintenance Manual(s).
- C.12.2 Audible Alarm(s).
  - C.12.2.1 Installation, Operation, Service, and Maintenance Manual(s).
- C.12.3 Visual Alarm(s).
  - C.12.3.1 Installation, Operation, Service, and Maintenance Manual(s).

# IIAR 9

## Normative Chapters

## Informative Appendices

1 – Purpose

2 – Definitions

3 – References

4 – Equipment and System  
Documentation

5 – Inspection, Testing, and Maintenance

6 – System and Equipment Operation

7 – Minimum System Safety  
Requirements Applicable to All Systems

8 – Minimum System Safety Evaluation  
Methodology

A – Explanatory Materials

B – Equipment/System Component  
Documentation

C – Additional Equipment/System  
Component Documentation

D – Machinery Room Signs

E – Example of a Minimum System Safety  
Evaluation

F – References and Sources of References



# Appendix B: Equipment/System Component Documentation

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# Appendix B: Equipment/System Component Documentation

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# Appendix B: Equipment/System Component Documentation

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- 1. Piping and Instrumentation Drawing(s) (P&IDs)
- 2. Block Flow Diagram(s) or Simplified Process Flow Diagram(s)
- 3. Machinery Room Electrical Classification Documentation
- 4. Relief System Design and Design Basis
- 5. Machinery Room Ventilation Design Basis and Calculations
- 6. Material and Energy Balance
- 7. Maximum Intended Inventory
- 8. Safe upper and lower limits for such items as temperature, pressure, and level
- 9. Safety systems such as setpoints, interlocks, and detection
- 10. Safety Data Sheet for Anhydrous Ammonia

# IIAR 9

## Normative Chapters

## Informative Appendices

1 – Purpose

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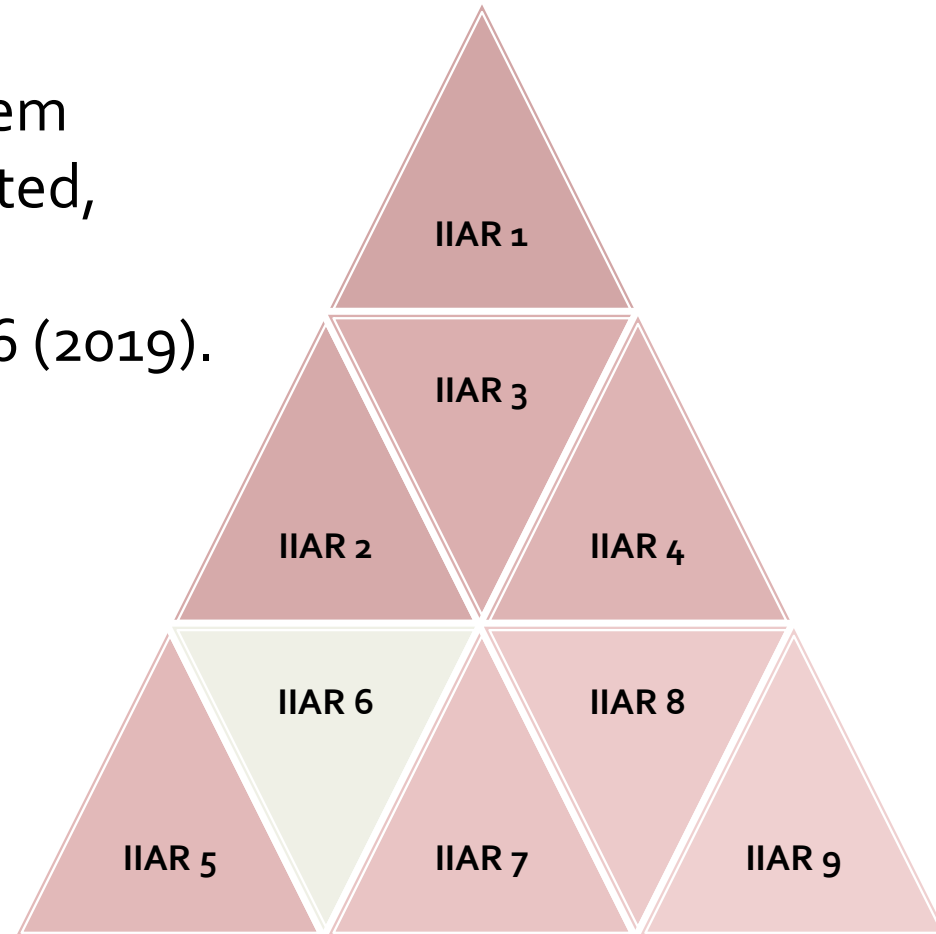
E – Example of a Minimum System Safety  
Evaluation

F – References and Sources of References

# Chapter 5: Inspection, Testing, and Maintenance

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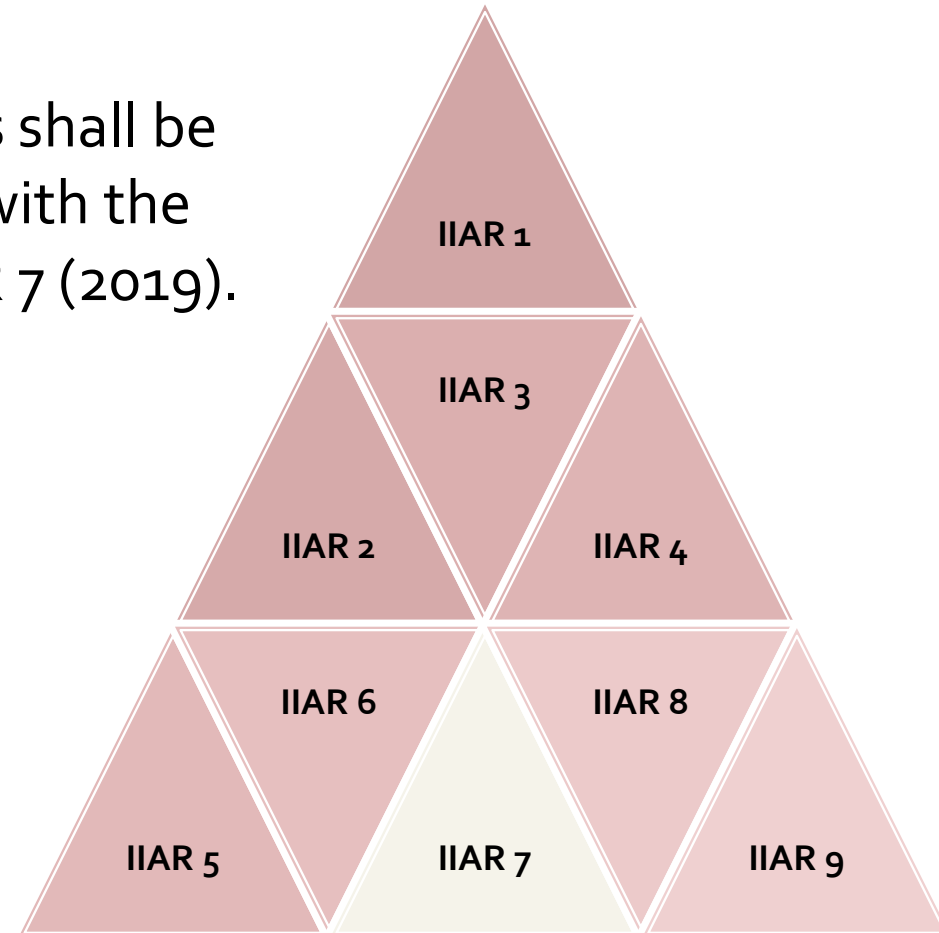
- §5.1 All equipment and system components shall be inspected, tested, and maintained in accordance with ANSI/IIAR 6 (2019).



# Chapter 6: System and Equipment Operation

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- §6.1 Operating procedures shall be developed in accordance with the requirements of ANSI/IIAR 7 (2019).



The image shows an industrial facility with a complex network of yellow and red pipes. A large, grey, rectangular piece of equipment is the central focus, surrounded by a brown steel structure with railings. A yellow label with the text 'EC2' is visible on the equipment. The background shows a clear blue sky and some distant industrial structures.

# ANSI/IIAR 9-2020

## Chapter 8

# IIAR 9

## Normative Chapters

## Informative Appendices

1 – Purpose

2 – Definitions

3 – References

4 – Equipment and System  
Documentation

5 – Inspection, Testing, and Maintenance

6 – System and Equipment Operation

7 – Minimum System Safety  
Requirements Applicable to All Systems

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Methodology

A – Explanatory Materials

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Documentation

C – Additional Equipment/System  
Component Documentation

D – Machinery Room Signs

E – Example of a Minimum System Safety  
Evaluation

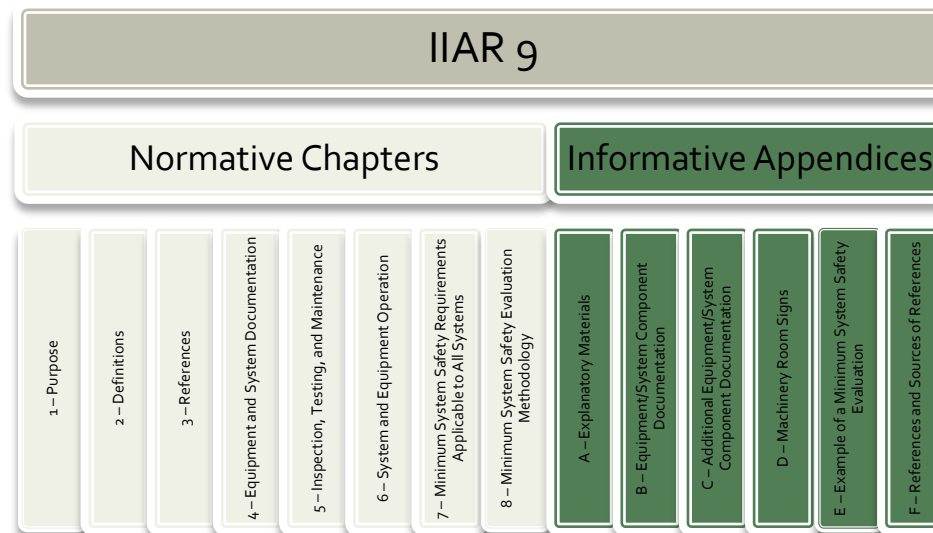
F – References and Sources of References



# Chapter 1: Scope

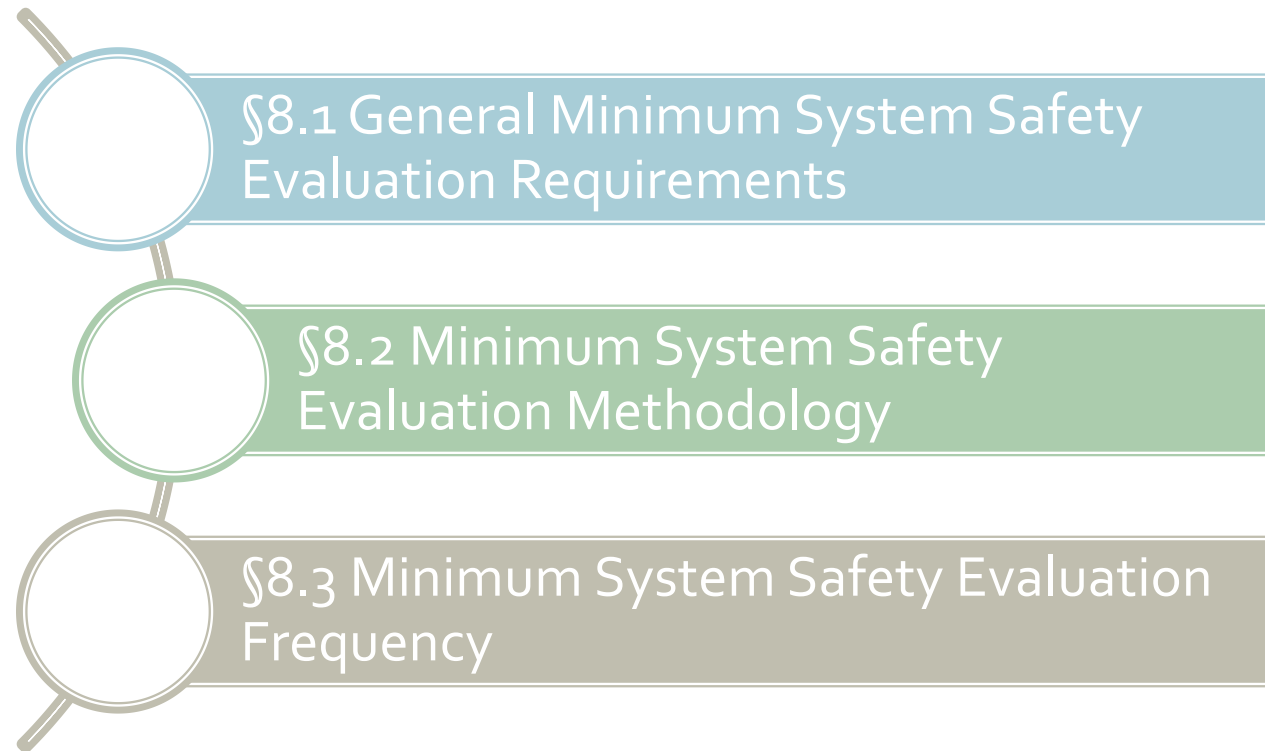
## ➤ §1.2 Scope

- §1.2.1 This standard provides a method to determine if existing stationary closed-circuit refrigeration systems using ammonia as a refrigerant comply with minimum system safety requirements.



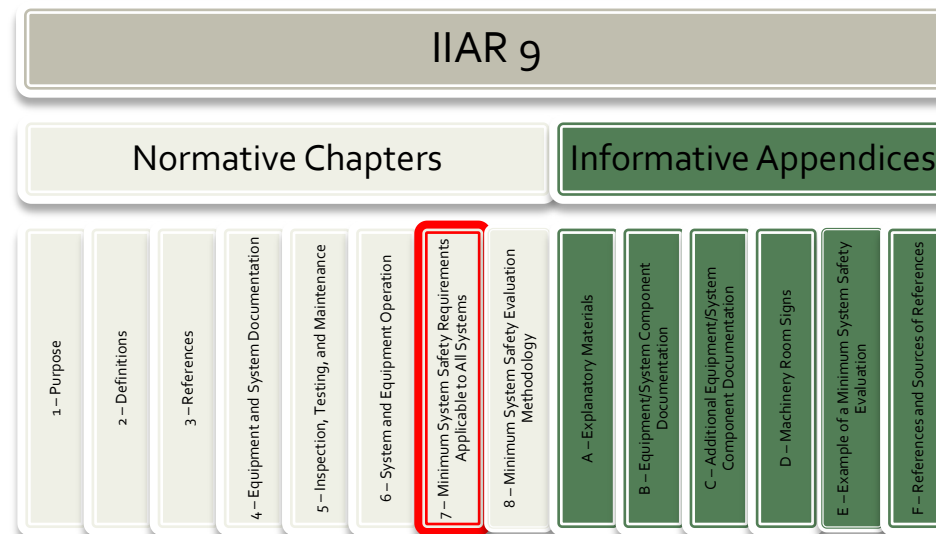
# Chapter 8: Minimum System Safety Evaluation Methodology

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# General MSSE Requirements

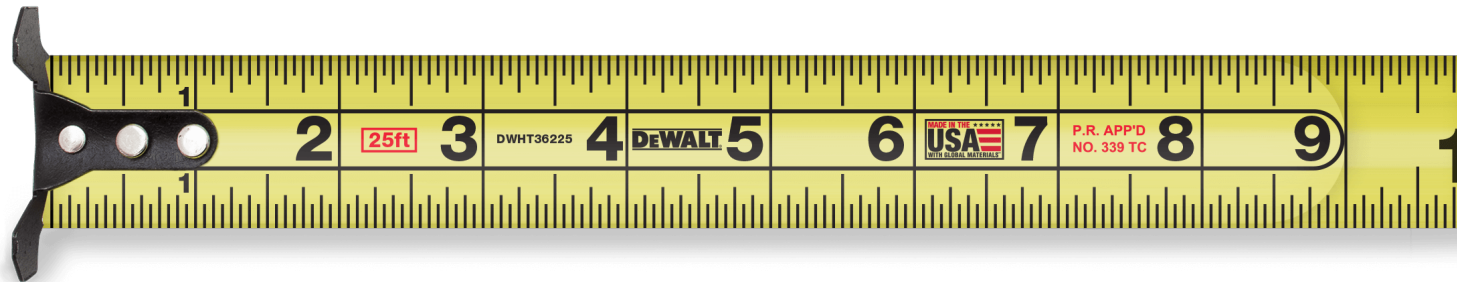
- §8.1.1 The owner or the owner's designated representative shall conduct regular evaluations to document that the ammonia refrigeration system complies with the minimum system safety requirements.



# MSSE Methodology

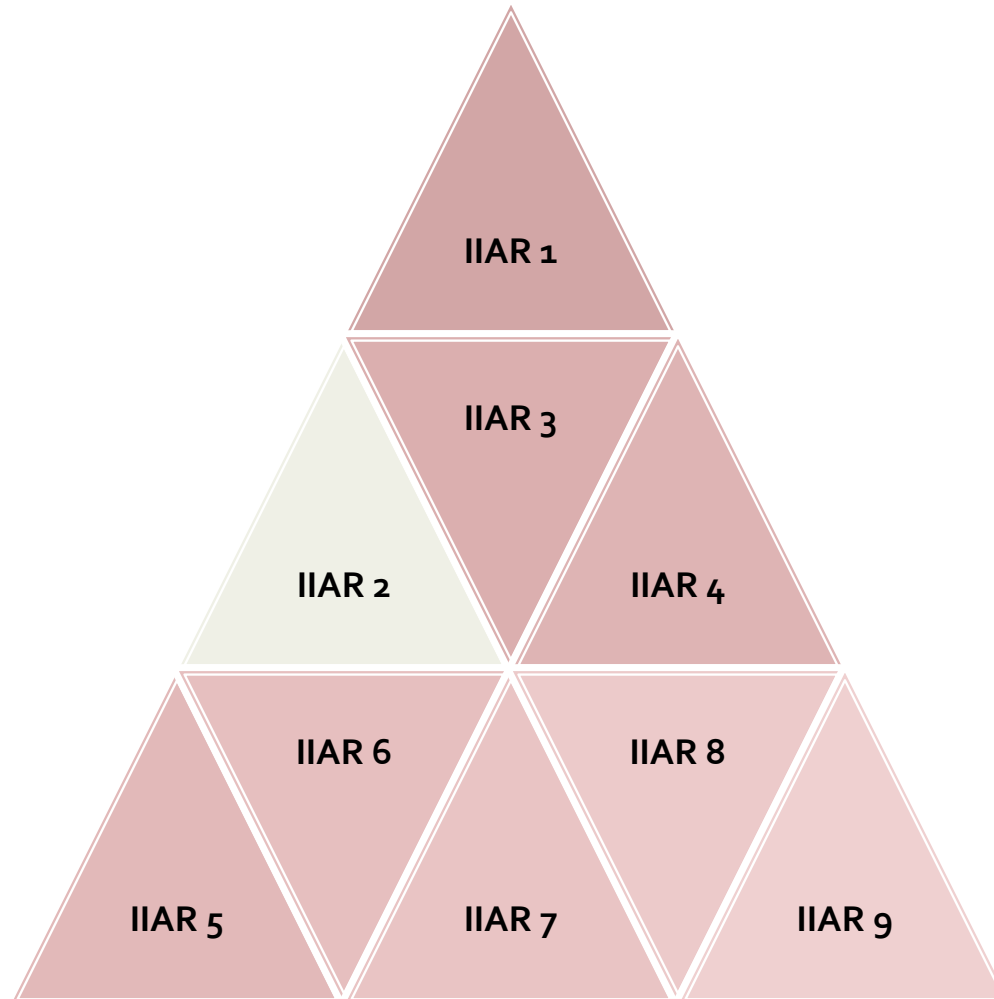
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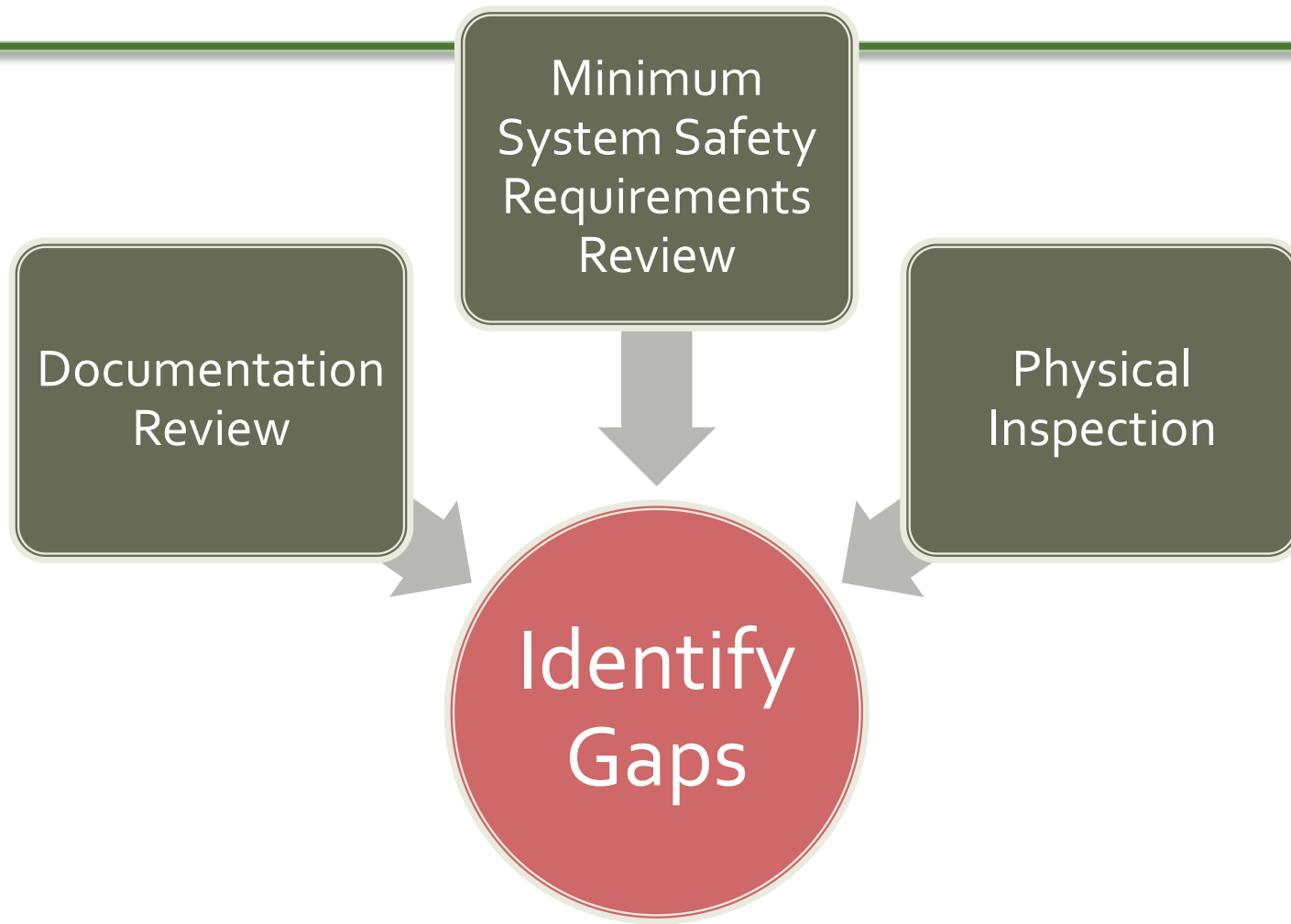
- §8.2.1 Existing ammonia refrigeration system(s) shall be evaluated using the minimum system safety requirements contained within this ANSI/IIAR 9 standard.



# MSSE Methodology

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# MSSE Methodology

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- §8.2.4 The results of the minimum system safety evaluation and the procedures used to identify gaps shall be documented.
- §8.2.5 Documentation shall be provided specifying the action(s) taken to address each of the gap(s) identified during the minimum system safety evaluation using one of the following options:
  - Close the gap
  - Decline to close the gap



# Declining to Close a Gap

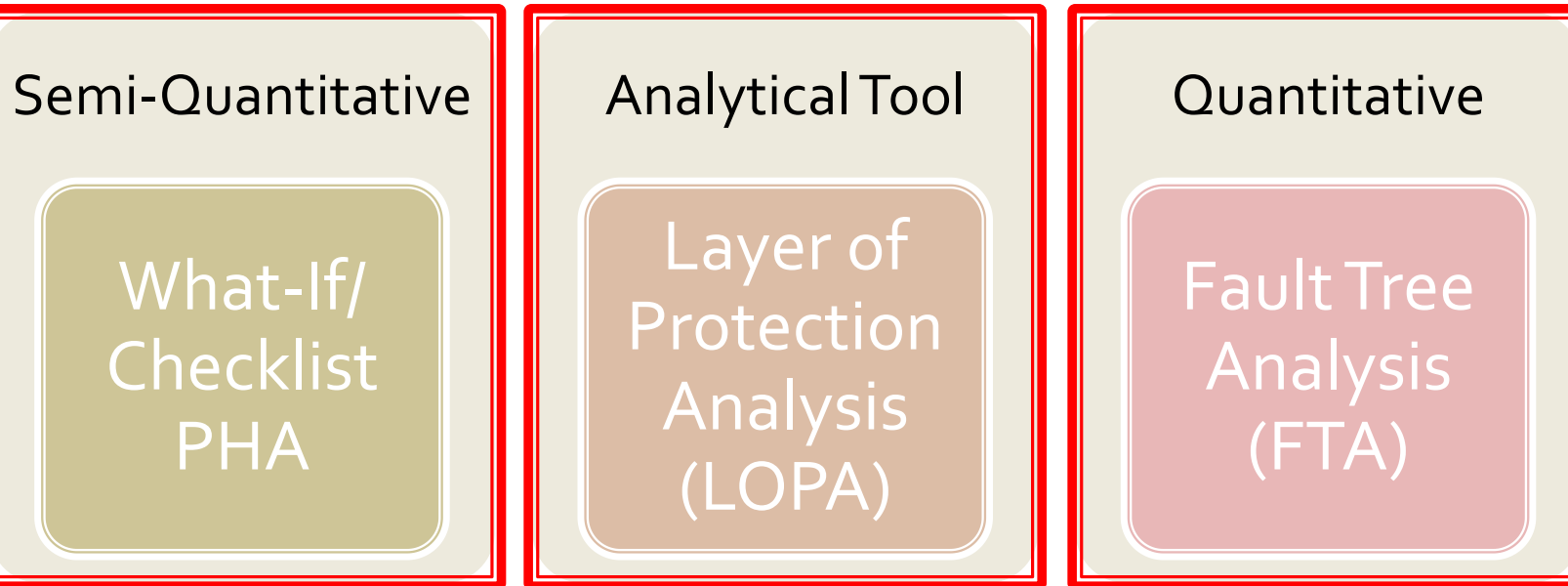
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- When declining to close a gap, justification must be provided using one of the following:
  - 1) A semi-quantitative technique for risk-based ranking.
  - 2) An analytical tool.
  - 3) A quantitative risk analysis.
  - 4) The owner or the owner's designated representative shall obtain a variance from the Authority Having Jurisdiction (AHJ).



# Declining to Close a Gap

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# MSSE Frequency

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- Initial evaluation is required within five years of the date of publication (~March 18, 2020)
- Evaluations must be revalidated at least every five years



# Comparing Chapter 1 and Chapter 8

| Requirement                 | Chapter 1  | Chapter 8  |
|-----------------------------|--|--|
| Initial MSSE                | <p>§1.2.1.1<br/>An initial safety evaluation shall be conducted for each ammonia refrigeration system to ensure that they comply with the safety requirements specified in IIAR 9 within five years from the date of publication of this standard.</p> | <p>§8.3.1<br/>The initial minimum system safety evaluation shall be conducted within five years from the date of publication of this standard.</p> |
| MSSE Revalidation Frequency | <p>§1.2.1.2<br/>The safety evaluations shall be revalidated at least every five (5) years.</p>   | <p>§8.3.2<br/>Minimum system safety evaluations shall be revalidated at least every five years.</p>  |
| MSSE Methodology            | <p>§1.2.1.3<br/>Chapter 8 of this standard describes the methodology which shall be used to conduct the safety evaluations.</p>  | <p>§8.2<br/>Minimum System Safety Evaluation Methodology</p>   |

# Appendix E

| Table E.1  |  |  |   |
|--|--|--|---|
| BSR/IIAR 9-2019 Detection System Requirements  | Existing Machinery Room Ammonia Detection System   | Gaps Identified  | Method Used to Address Gaps   |
| 7.3.12.1 (1):<br>At least one ammonia detector shall be provided in the room or area.  | The machinery room contains two ammonia detectors.   | None   | N/A   |
| 7.3.12.1 (2):<br>The detector shall activate an alarm that reports to a monitored location so that corrective action can be taken.                 | The machinery room ammonia detectors activate alarms at 25 ppm on the facility call-down system. | None   | N/A   |
| 7.3.12.1 (3) (Part 1):<br>Audible and visual alarms shall be provided inside the room for alarm response.  | Audible and visual alarms are provided inside the machinery room.                                | None   | N/A   |
| 7.3.12.1 (3) (Part 2):<br>Additional audible and visual alarms shall be located outside of each entrance to the machinery room for alarm response. | An audible and visual alarm has been provided outside the main entrance to the machinery room.   | There is no audible and visual alarm outside the secondary entrance to the machinery room. | Install an audible and visual alarm outside the secondary entrance to the machinery room. This action item will be tracked in the facility's PSM on-line tracking system. |



# Any Questions?

Peter Thomas, P.E.  
Resource Compliance

559-994-0162

[pthomas@resourcecompliance.com](mailto:pthomas@resourcecompliance.com)

