Implementing a DAHS for Compliance with the Refinery Sector Rule

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Acknowledgements

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Agenda

❑ Purpose

❑ Infrastructure

❑ Integration

❑ Configuration

❑ Verification

❑ Implementation

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Purpose

Raw Data

Compliance Data

CMS Operating Data

?
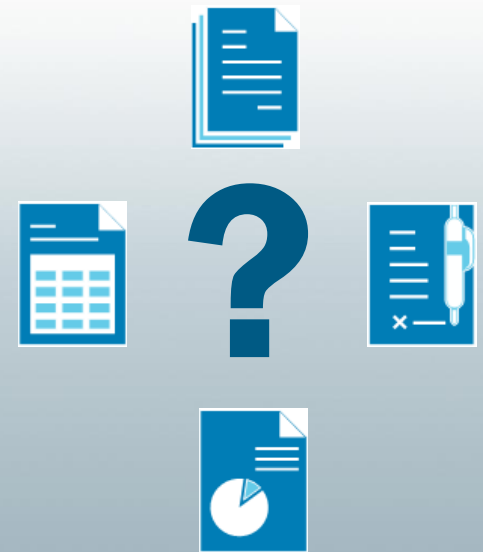
Source: Environmental Systems Corporation 4C Workshop Presentation

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Ideal Configuration

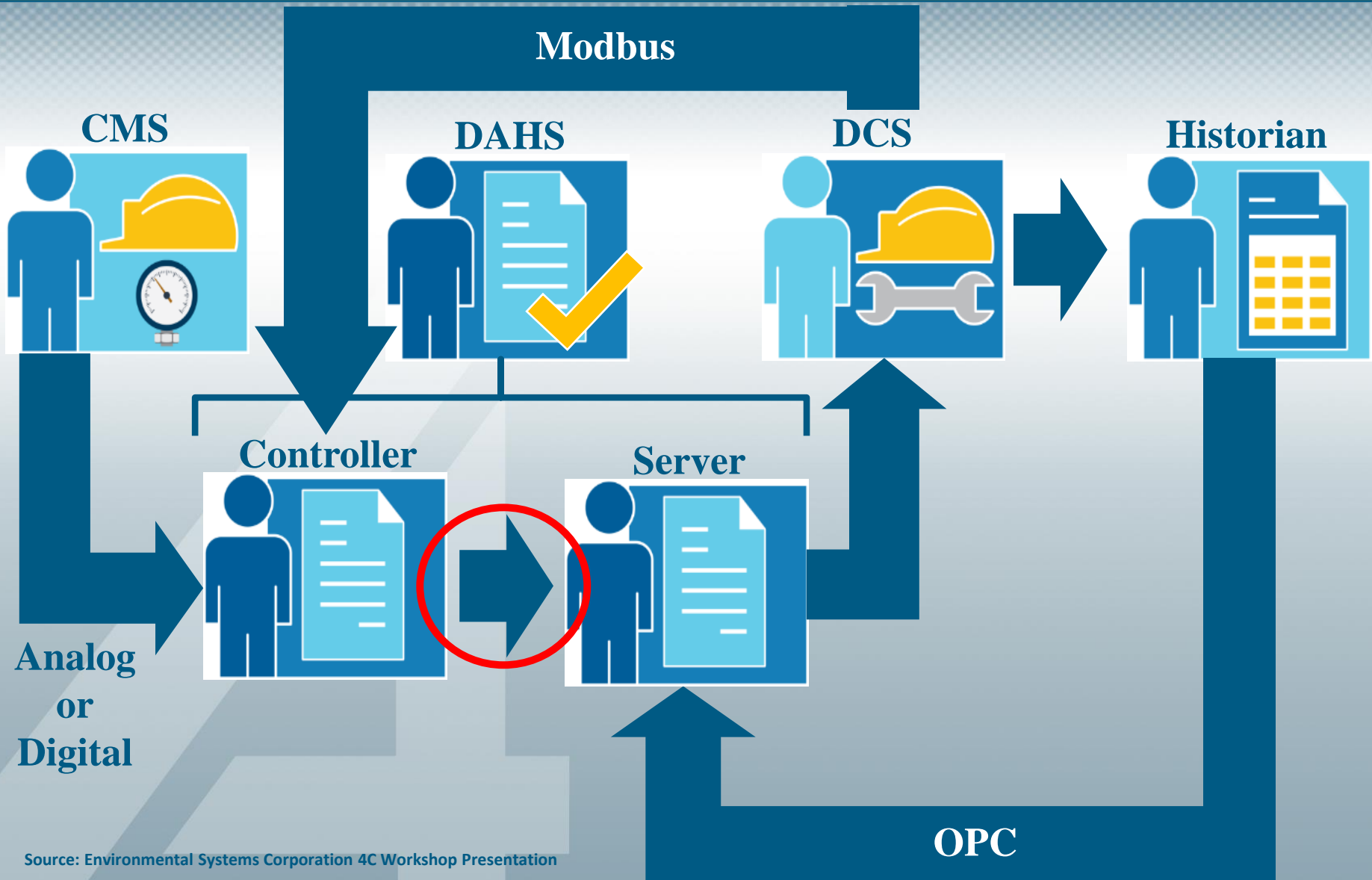**Spreadsheets** **Historian** **DCS** **DAHS** **CMS**

Infrastructure

The hardware, software, and security platforms that may limit or enhance the DAHS.

❑ Infrastructure:
- ❑ IT Security (Firewalls)
- ❑ Data Transfer (wires, fiberoptic, etc.)
- ❑ Data Communication Protocols

Integration

The ultimate use of the DAHS at a facility as part of the compliance solution.

❑ Integration:
   ❑ Infrastructure Limitations
   ❑ Process Controls
   ❑ Operations/Instrumentation
   ❑ Alarms/Notifications
   ❑ Reporting

Configuration

The process for interpreting the regulatory requirements in order to build a DAHS-based compliance approach.

❑ Configuration:

    ❑ Regulatory Requirements

        • Validation, calculation, averaging, quality assurance actives, operational status, etc.

    ❑ Documentation

    ❑ Reporting Database Structure

Configuration

❑ Regulatory Interpretations

    ❑ Newly Applicable

        • 40 CFR Part 63 Subpart CC

        • 40 CFR Part 63 Subpart UUU

    ❑ Existing

        • 40 CFR Part 60 Subpart Ja

Verification

The process by which the DAHS will be evaluated for correctness and completeness.

- Verification:
    - Data Analysis
    - Alarm/Notification Review
    - Report Review

Implementation

The process for implementing and delegating the use of the DAHS.

❑ Implementation:

   ❑ Training (or Re-training)

   ❑ DAHS Roll-out

      • Manageable Pieces

      • Achievable Schedules

Conclusion

- Infrastructure

- Integration

- Configuration

- Verification

- Implementation

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Questions?

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