

Don't Let Your Safe Operating Limits Leave You S-O-L (Out of Luck)

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Abstract

Collection and Utilization of process safety metrics is an important tool for driving improved safety. Tier 3 leading indicators (challenges to safety system) indicate failures of process safety management systems and highlight areas that should be improved to prevent a more serious event. Safe Operating Limit (SOL) exceedances are a commonly used Tier 3 leading indicator. Surprisingly, there are many different approaches used in industry to calculate safe operating limits and to apply them. This inconsistency potentially diminishes the usefulness of SOL exceedances as an effective indicator.

This paper discusses current industry practices around the determination and application of safe operating limits as established by a recent benchmark survey of over 150 safety practitioners from around the world. Areas explored in the survey of SOLs include; methodology for calculating, how / where information is stored, how / when established values are reviewed and audited, usage as a Process Safety Management Leading indicator, integration with operations (training, documentation), identification and tracking of when exceedances have occurred, and actions taken on exceedance. Key results and conclusions will be presented as well as recommendations on where industry should focus on improvement.

1 Introduction

Determination and documentation of Safe Operating Limits (SOLs), the limits beyond which would be considered upset conditions, is required per the OSHA Process Safety Management (PSM) Regulation 1910.119. SOLs and associated consequences of deviation that could occur if these limits were violated are considered part of the Process Safety Information (PSI) [1]. Exceeding Safe Operating Limits are considered a Tier 3 Process Safety Management Leading Indicator per API RP-754 [2]. SOLs are typically documented in operating procedures and should be well known and understood by the operations team, including how to respond to

prevent the potential consequence (the consequence of deviation). SOL values should be firmly established to support HAZOP analysis and evaluation of process changes as part of management of change (MOC).

Despite the broad applicability across industry, the determination and application of SOLs often varies from company to company. An industry benchmark study was conducted amongst 152 functional safety practitioners from around the world. The survey respondents were asked both multiple choice and short answer questions.

2 Notation

API	American Petroleum Institute			
CCPS	Center for Chemical Process Safety			
DCS	Distributed Control System			
ISA	International Society of Automation			
I/O	Input/Output			
IPL	Independent Protection Layers			
KPI	Key Performance Indicator			
LOPA	Layer of Protection Analysis			
LOPC	Loss of Primary Containment			
MAWP / MAWT	Maximum Allowable Working Pressure / Temperature			
MOC	Management of Change			
OSHA	Occupational Safety & Health Administration			
PHA	Process Hazard Analysis			
PRV	Pressure Relief Valve			
PSI	Process Safety Information			
PST	Process Safety Time			
RT	Response Time			
SIS	Safety Instrumented System			
SOL	Safe Operating Limit			

3 What are Safe Operating Limits and Why Are they Important

Although the requirement to determine and document Safe Operating Limits is defined in OSHA PSM, there is no prescriptive instruction provided. This leaves the definition and methodology for determination open to interpretation. Industry guidelines are often inconsistent and

contradictory in methodology and terminology. Following are the definitions for SOL from CCPS, ISA, and API industry guidelines.

Safe Operating Limit (SOL) - Limits established for critical process parameters, such as temperature, pressure, level, flow, or concentration, based on a combination of equipment design limits and the dynamics of the process [3,4].

Safe Operating Limit (SOL) – A value for a critical operating parameter (e.g., low/high pressure, level, temperature, pH, composition, and flow) that defines the equipment or process unit safe operating envelope beyond which a process will not intentionally be operated due to the risk of imminent catastrophic equipment failure or loss of containment. Operational or mechanical corrective action ceases and immediate predetermined actions are taken at these critical operating parameter values in order to bring equipment and process units to a safe state [5].

Safe Operating Limit (SOL) – value for a critical operating parameter outside of the normal operating limits defining a threshold of abnormal process condition beyond which predetermined actions are taken in order to avoid a hazardous event and return the process to a safe state.

NOTE 1: The definition of "safe state" can be different for different protection layers, such as returning the process to the normal operating limits or safely shutting down the equipment.

NOTE 2: Exceeding a safe operating limit is indicative of an abnormal operating condition.

NOTE 3: The IPL setpoint can coincide with a SOL in some cases [6].

Figure 1 below provides a means to visualize Safe Operating Limits as applied to API-RP 754, where SOL exceedances are defined as a Tier 3 Process Safety Performance leading indicator.

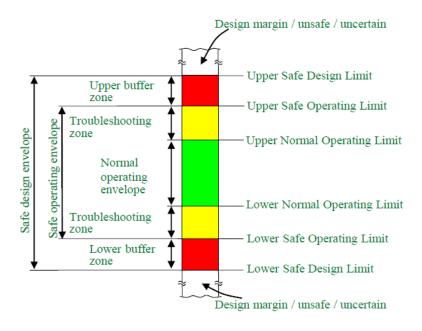


Figure 1. Safe Operating Limits [7]

Safe Operating Limits represent the point beyond which troubleshooting ends and predetermined action occurs to return the process to a known safe state. Pre-determined actions may range from manually executed operating procedures to a fully automated safety instrumented system [8]. Operating outside the Safe Operating Limits results in a higher probability of Loss of Primary Containment [7].

Consolidating key aspects of the definitions above yields the following elements for discussion of safe operating limits. Safe operating limits:

- Are values of critical operating parameters (e.g., low/high pressure, level, temperature, pH, composition, and flow) outside of the normal operating limits.
- Are established based on a combination of equipment design limits and the dynamics of the process.
- Define the equipment or process unit safe operating envelope beyond which a process will not intentionally be operated due to the risk of imminent catastrophic equipment failure or loss of containment.
- Represent the point at which troubleshooting ceases and immediate predetermined actions are taken in order to bring equipment and process units to a safe state. Predetermined actions may range from manually executed operating procedures to a fully automated safety instrumented system.

4 Survey Demographics

Over 150 functional safety practitioners from around the world participated in the survey. The table below shows the major countries that were represented.

Table 1.	Top 1	Respond	lents	by (Countr	y
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#	Country	% of Respondents
1	United States	30.9%
2	Canada	6.6%
2	India	6.6%
2	United Kingdom	6.6%
5	Australia	4.6%
6	Netherlands	4.0%
7	Brazil	2.6%
7	Germany	2.6%
	Other	25.3%

Respondents were asked whether their site / company has one or more processes that are covered by the OSHA PSM regulation (CFR 1910.119) or equivalent regulation (e.g., COMAH, Seveso III). As shown in Figure 2 below, 57% answered Yes.

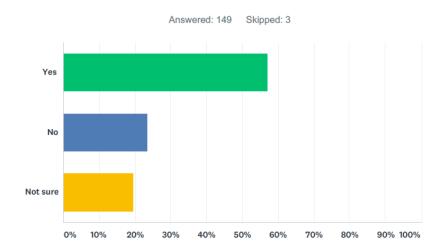


Figure 2. Respondents having processes covered by a Process Safety Regulation

5 Survey Results

Operational Limits

The survey respondents were asked what types of operational limits were used or defined in their companies. Figure 3 shows that 84.3% of the respondents define Safe Operating Limits (or equivalent) at their company. Almost as many (75.6%) define process control operating limits, such as normal operating limits. Some respondents indicated that they define separate and distinct environmental limits for emissions and effluent.

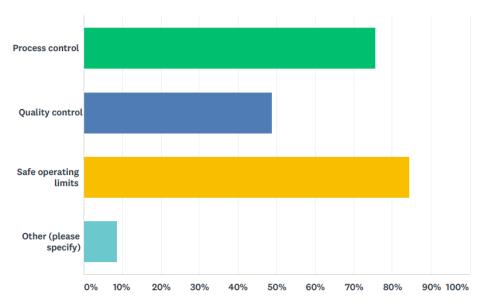


Figure 3. Types of Operational Limits that are Defined

Key Information for Establishing Safe Operating Limits

Respondents were asked what information was most important to establishing Safe Operating Limits. As shown in Figure 4, the most popular answer (but not the majority) was "Design Constraints" at 38%. Almost as many respondents (36.4%) answered "Safety Instrumented System trip points and relief valve settings"; while another 15% answered "Normal operating limit". None of the respondents selected "Mechanical Integrity Limit" as the most important information.

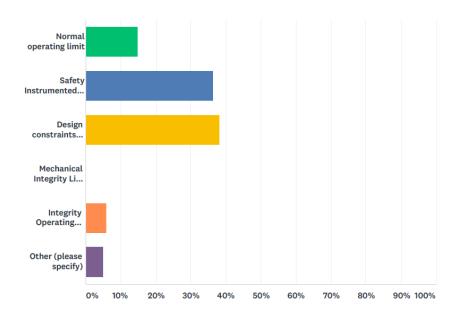


Figure 4. Important Information for Establishing Safe Operating Limits

Based on the definitions provided earlier, the expected answer to this question was "Design Constraints (Maximum allowable working pressure)". Strictly speaking, the Safe Operating Limit is not a function of the SIS setpoint; it is a function of the process hazard and the normal operating limit [6].

Free form input different from the multiple choice answers could also be entered. Responses of note included the following:

- A combination of following factors:
 - Mechanical integrity (maximum and minimum pressures and temperatures, effects of corrosion and erosion, effects of vibration, fatigue and differential thermal expansion, safety factors in design.
 - Process specific safety requirements
 - o Response time and integrity of protective systems
 - Response time and preparedness of personnel to abnormal situations and human limitations
 - Systematic risk assessment with respect to safety, environment and asset/production loss.

- Process safety time which depends on the relevant design constraints (not just pressure) and on the dynamic behavior of the process.
- In our systems, the process media for a specific parameter e.g. pressure, or temp. has different layers as below:
 - Never Exceed (Low/ High)
 - Safe Operating Limit (Low/ High)
 - Interlock Levels (Low/ High)
 - o Alarm Levels (Low/ High)
 - Operating Range (Low/ High)

The Process for Establishing Safe Operating Limits

As a follow up to the previous question, respondents were asked to describe, at a high level, the process for defining SOLs. Responses of note included the following:

• Mechanical design

- Maximum Allowable Over Pressure is the determination for most safe operating limits in the facility
- Safe Operating Limit are defined by taking into consideration the design constraints (design values) of the operating equipment. Based on the metallurgy and other factors the mechanical integrity values are determined. The safe operating limits are then defined at these mechanical integrity values
- Based on mechanical design limits, process design limits for safe operation, response time and reliability limitations of protective systems/measures and systematic risk assessment.
- o Limit is set at 90% of equipment's MAWP and/or Temperature.
- The safe operating limits are usually below the maximum allowable working limits.

• Process consideration

- Safe Operating Limits are governed by the process design requirements. As per the intended process, Safe operating limits are defined and then mechanical design limits are identified.
- o process flow in & out from the equipment in question and the time required to get to high level (alert level), generally it is 5-10% of the higher limit
- o as per the normal operating values of the process flow diagrams and material and heat balances
- The process dynamic analysis is used to set limits based on inventories, flowrates, pressures, temperatures, flow or pressure relief capacity, design safety margin, etc.
- o For high level, threshhold value is the level at which entrainement can take place is given by the Process engineer which is configured as SIS set point. Safe operating limit: Depending on the volume and time taken to reach the SIS level from a high level alarm is generated Example: 40-55% safe operating level and 75% is SIS set level. margin of 20% approximately has process safety time of 30 minutes
- Process and mechanical consideration

- o It's a combination of equipment design constraints and process technology information; the more restrictive of the two becomes the SOL
- o Inferred from equipment design limits or process simulation and defined such that safety systems can respond fast enough if the process exceeds the SOL.
- Safe operating limits are defined based on RBI (Risk based inspection), design and operational constraints.
- During the plant design (plant subject of a project) Safe Operating Limits are established to avoid: damages to equipment with consequence of injuries, loss of containment and loss of production mainly
- o Safety margin applied to materials and process values
- We apply a safety factor on Design limits. This factor is based on mechanical integrity and operational constraints
- o Process engineering defines safe operating limits based upon equipment design, system capacity, static/dynamic operating conditions.
- A range outside of the normal operating limits beyond which LOPC or other serious process safety events can occur (runaway reactions, etc.). SOLs still provide a buffer between the boundary of the SOLs and the equipment limits (MAWP, etc.) to provide response time in the process shutdown before a catastrophic loss of containment should occur.
- Safe operating limits is defined as limits based on flow, temperature, pressure, and levels in accordance with the mechanical equipment and process conditions.
- Set to match (e.g. interlock trip, relief set point)
 - In many cases, it is not available or assumed to be equal to the interlock / relief valve settings.
 - o Currently SOLs are the design constraints or process safety time.

Storing Official Record of Safe Operating Limits

Respondents were asked about the location for the official repository of SOL information. Figure 5 shows that the results ranged from 32% for a "Documentation System", to 30% for the "Unit Operating Procedure" to 18% for a "Spreadsheet". The main documentation systems mentioned included Documentum, SAP, Dymenzions, and MS Sharepoint. Other responses included P&IDs, Equipment & Piping data sheets, SRS, and SIF datasheets.

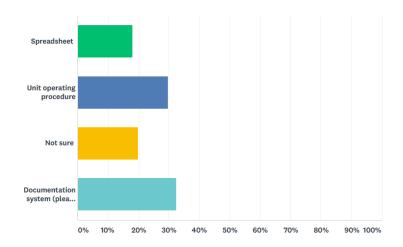


Figure 5 – Storage Location for Safe Operating Limits

Periodic Review of Safe Operating Limits

Figure 6 shows that 62.5% of respondents answered that Safe Operating Limits were reviewed periodically.

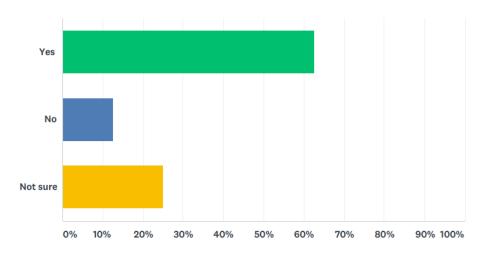


Figure 6 – Periodic Review of Safe Operating Limits

Using Process History to Validate Safe Operating Limits

When respondents were asked whether they review process history from a data historian to validate safe operating limits, 54.8% responded that they do. As shown in Figure 7, 45% said that they did not, with 24% responding that although they do not, they would like to be able to do this. Providing industry practitioners with the ability to review SOLs against actual operating envelopes (and other design limits) appears to be an area that could be improved.

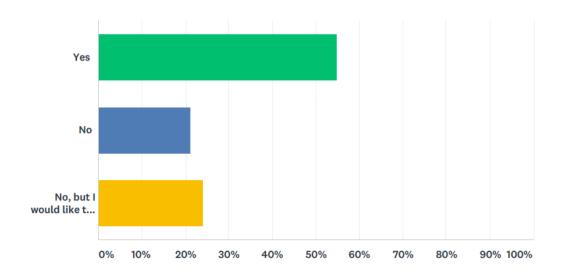


Figure 7 – Use of Process History to Validate Safe Operating Limits

Actions Taken When a Safe Operating Limit is exceeded

Respondents were asked what actions were taken when a Safe Operating Limit was exceeded. Following are some of the notable responses:

- Alarm, event recording, incident investigation, project revision (during project startup)
- root cause failure analysis
- Investigation and if change is required the Management Of Change procedure must be followed.
- An alarm is generated and automatic protective actions, if any, are initiated. Manual response is based on standard operating procedures for the plant. Alarms are generally prioritized based on an alarm rationalisation study to focus attention of operators on the most important issues.
- Our clients have formal procedures for incident investigation. All trips are investigated.
 Alarm frequency and duration are also monitored and investigated if too high. We have challenged some of our clients who have misunderstood the basis of the limits and raised change orders to increase limits when the first action should have been to review the cause of frequent alarms.
- Alarm then Trip
- depends on the client; however, part of clients unfortunately do not treat activation of SIFs or PRV as a potential catastrophic incident. Reset-carry-on because "nothing happend"
- Alarms are set before SOL. SOL point is usually when a trip occurs. Depending on severity, incident investigation may occur.
- initially alarm generated, if followed by an automated shutdown (SIS) a formal incident investigation is conducted.
- Actions as defined in operating procedures of equipment/plant are normally undertaken

• An investigation is done why it has occurred and depending on the outcome e.g.

- instrument failure, real process failure, decisions is made how to prevent that in the future.
- Alarm generated when a safe operating limit is exceeded. KPI system to capture the number of critical alarms generated are recorded as Lagging indicators in Process Safety KPI
- Process review will be carried out and alarm setting reviewed and process incident will also be reviewed. Result of the review will be analysed and measures put in place to forestall reoccurrence. This will be documented and cascaded to relevant persons
- "Near miss" event recorded and possibly investigated.

85% of respondents also reported that Safe Operating Limit exceedances needed to be reported to management.

Frequency of Exceeding Safe Operating Limits

Respondents were asked how often they thought their site experienced an exceedance of an SOL. As shown in Figure 8, the majority (60.9%) indicated that exceedances occur once per year or less. 32% of the respondents indicated that exceedances occur once per month or more frequently.

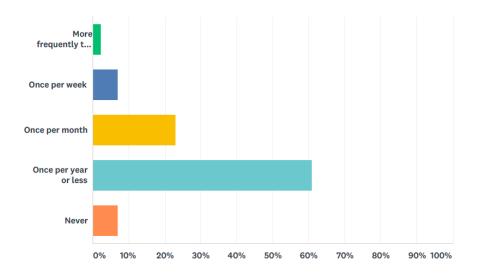


Figure 8. Frequency for Exceeding Safe Operating Limits

Use of SOL Exceedances as Process Safety Leading Indicators

The survey asked whether SOL exceedances were counted as Process Safety Leading Indicators. Figure 9. shows that 62.9% indicated "Yes", while 21.4% responded that they were "Not sure". It seems notable that such a large percentage of the respondents (21.4%) were not sure; this indicates a potential area where companies can improve in the communication of their Process Safety Management plans.

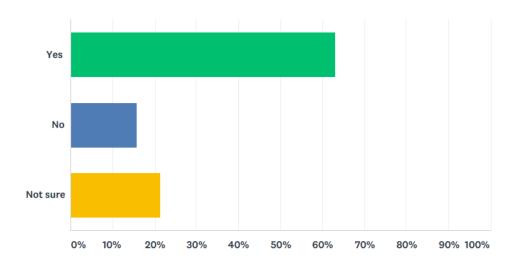


Figure 9 – Counting SOL Exceedances as Leading Indicators

According to ANSI / API-RP 754 "Process Safety Performance Indicators or the Refining and Chemical Industries" and as shown in the figure below, performance indicators are divided into four Tiers.

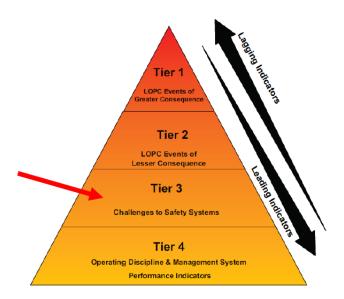


Figure 10 – Process Safety Leading and Lagging Indicators (4 Tier Structure) [7]

SOL Exceedances are one of four recommended Tier 3 Leading Indicators.

- Safe Operating Limit Exceedances
- Demands on Safety Systems
- Primary Containment Inspection of Testing Results Outside Acceptable Limits
- De minimis LOPC Events [7,8]

For each valid SOL exceedance, the following information should be measured and reported:

- peak value,
- duration of exceedance, and
- description of the initiating cause.

Frequent and/or prolonged SOL exceedances should be investigated to determine the initiating cause and the barrier failure [7].

Operator Training and Awareness of Safe Operating Limits

Respondents were asked whether their operators are trained and made aware of the Safe Operating Limits for the process units they monitor and control. The majority of respondents (82.6%) answered "Yes", while 3.3% answered "No" and 14.1% were "Not Sure".

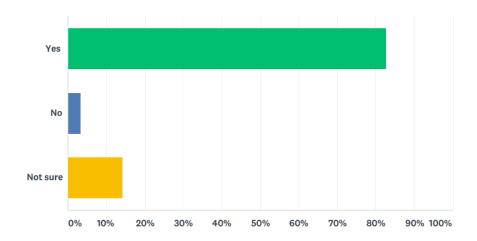


Figure 11 – Operator Training / Awareness of Safe Operating Limits

Per the OSHA PSM regulation, operating procedures are required to document (safe) operating limits, consequences of deviation, and the steps required to correct or avoid deviation; therefore, it should be expected that 100% of operators are trained and aware of relevant safe operating limits. SOL-related alarms will likely be some of the highest priority alarms in the system; operators should be trained to understand their importance [3]. This might be a relevant learning that industry can get better at ensuring operators are trained on the Safe Operating Limits for their areas of responsibility. Additional recommendations on how to optimize operator response to SOL-related alarms can be found in previous works [9,10].

Making Safe Operating Limit Information Available during PHA, LOPA, and Alarm Rationalization

Respondents were asked whether it would be beneficial to have Safe Operating Limit information available during a PHA / LOPA and during alarm rationalization. Approximately 95% of the respondents answered "Yes" to both of these questions.

This result also introduces an area that could be improved. PHA / LOPA and alarm rationalization tools could potentially be improved to allow Safe Operating Limit information to

be easily entered and then displayed in context as necessary. During alarm rationalization, evaluation of alarm limits for safety alarms or SOL pre-alarms should reference the Safe Operating Limits.

Defining Alarms to Indicate SOL Exceedances

Respondents were asked whether they define alarms in the control system to indicate Safe Operating Limit exceedances. As shown in Figure 12 below, 69.2% of the respondents answered "Yes" to this question. This question probably requires / required additional information. There could be applications where an alarm and operator response is the required action to prevent the consequence of deviation from occurring. If the response to an SOL exceedance is a SIS trip or PRV event, then there might not be an alarm generated (SIS trip takes the process to a safe state and no operator action is needed); thus the essence of the question is whether an alarm is generated for the purpose of capturing the SOL exceedance. Per the definition of an alarm in ANSI/ISA-182.-2016, if no operator action is needed, then the notification would not be considered an alarm [11].

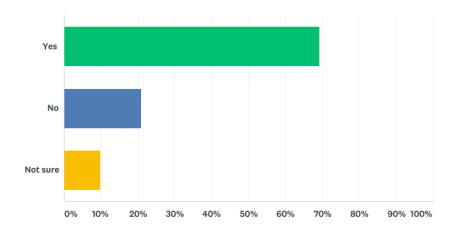


Figure 12 – Defining Alarms to Indicate SOL Exceedances

Recording SOL Exceedances

Respondents were asked whether they keep records of SOL exceedances in a database for the purpose of analyzing performance. As shown in Figure 13, 52.3 % answered "Yes", 31.4% answered "No" and 16.3% answered that they "Plan to in the future". Adding the ability to record and document SOL exceedances for performance analysis is another area where tools could be enhanced to better support PSM practitioners.

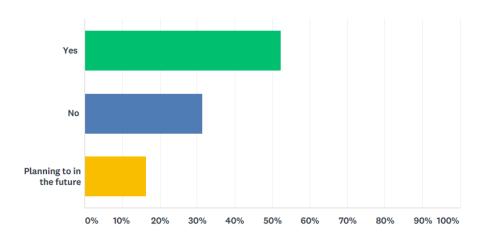


Figure 13 – Recording of SOL Exceedances in Database for Analyzing Performance

6 How are Safe Operating Limits Determined

SOLs, which are typically identified for each hazardous process unit, should meet the following requirements:

- SOLs are established on critical operating parameters only if it is physically possible to exceed the limit and if exceeding the limit could lead to a catastrophic failure of process equipment or loss of containment [5].
- SOLs are set based on a combination of equipment design limits and process dynamics [3] and must consider the process safety time.
- SOLs are determined by identifying design limits of equipment within a system. The most limiting elements will establish the SOLs for the system.
- SOLs are often set by code or by operating experience (particularly when these values were not provided as part of the design documentation).
- The technical basis for the SOL should be documented as part of the PSI package (Process Technology Information).
- Safety and environmental consequences of pressure relief system activation to the atmosphere (relief valve, rupture disc, etc.) should be considered in the determination of SOL settings [5].
- The Safe Operating Limit is not a function of the SIS setpoint; it is a function of the process hazard and the normal operating limit [6].

Safe Operating Limits in relation to Design Limits

As mentioned in the beginning of the text, one of the main issues with definition and application of safe operating limits is terminology. In Figure 14 below taken from the draft ISA-84 TR4, the Safe Operating Limit for an increasing process variable is shown in relation to the Design Limit, Never Exceed Limit, IPL Setpoint, and Normal Operating Limit. Clear and consistent definition of these other terms is important to be able to understand SOLs.

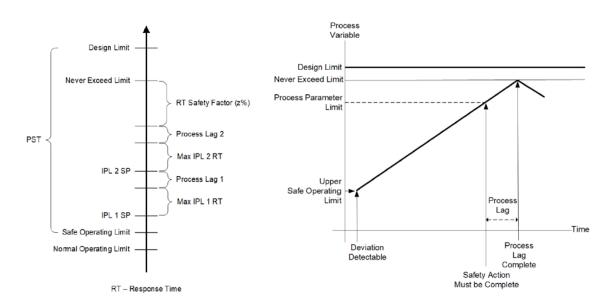


Figure 14 – Safe Operating Limit in relation to Design Limit, Never Exceed Limit, and IPL Setpoints [6]

Design limit (DL): the extreme value of a process variable that protects the asset integrity of the process equipment.

NOTE Factors to be considered in establishing the design limit typically include, but are not limited to: equipment design specification values (e.g., MAWP/MAWT) and standards used for testing the mechanical integrity of the equipment upon manufacture or modification [6].

Never Exceed Limit (NEL): the closest approach value to the design limit, allowing for operational and asset integrity uncertainties.

NOTE 1: These values are sometimes referred to as Safe Upper and Lower Limits.

NOTE 2: Factors to be considered in establishing the never exceed limit typically include, but are not limited to: design limit for the parameter, age of the equipment, severity of the operating environment and internal process, observed trend in condition of the equipment (e.g., results of periodic inspections), and Integrity Operating Windows (IOW) for the process equipment and piping.

NOTE 3: The NEL and the Design Limit can coincide in some cases [6].

The definitions and figures above hopefully provide additional clarity around the definition and application of Safe Operating Limits. For example, it shows that SIS trip points (shown as IPL 1 SP or IPL 2 SP in Figure 14) would typically be set above the Safe Operating Limits, but below the Never Exceed and Design Limits.

One discrepancy that has been discovered in the literature concerns how Safe Operating Limits relate to Never Exceed Limits. In some references, the Never Exceed Limits are shown inside of

the Safe Operating Limits [5]. This disagrees with the portrayal of Never Exceed Limits being outside of the SOLs as shown above in Figure 14 above.

7 Conclusion

Consistent definition and application of Safe Operating Limits is important to maintaining the process safety of hazardous plants and is integral to the following:

- Unit Operating Procedures and Emergency Shutdown Procedures
- Calculation of Tier 3 Process Safety Events (Leading Indicators)
- Management of Change Evaluation of whether a proposed change takes the process conditions outside of its safe operating limits [12]

As shown in this paper, the definition (calculation) of Safe Operating Limits has significant variability. Some of the key takeaways regarding definition of SOLs include:

- When evaluating Design Limits it is important to include the effects of Mechanical Integrity and Integrity Operating Windows in addition to design constraints such as MAWP or MAWT.
- Many practitioners set SOLs based on Design Limits such as MAWP. Some set SOL values equal to MAWP, others include a Safety Factor (e.g., SOL = 0.9 MAWP).
- The rate at which a scenario develops should be considered when setting SOL to assure there is sufficient time to take corrective action and return the process to a safe state.
- Industry would benefit by having more published examples of SOL calculations, such as those shown by Sutton [13].
- Inconsistent terminology makes it difficult to apply SOLs; for example, some references show SOLs falling outside of Never Exceed Limits.

Some of the key takeaways regarding application of SOLs include:

- Industry can improve operator training and visibility to the SOLs in their area of responsibility.
- Significant variability exists in where the official record of SOLs are stored, from unit operating procedure to Excel spreadsheet to Documentation system under access control.
- Industry can improve / provide the ability to compare actual process history from a data historian to safe operating envelopes for validation of the SOL values.
- Use of SOL Exceedances as a Process Safety Management Leading Indicator could / should be increased.
- Use of alarms to help prevent SOL exceedances and to capture SOL exceedances for review could be applied more rigorously.

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