

Shades of LDAR Gra/ey Report

(With LDAR Celebrity Respondents Answers)

Notice: None of this material is intended to apply to your specific LDAR situation or requirements and should not be used as a substitute for the professional advice otherwise available to you.

Set 1: The Raw Score were everyone's response was weighted equally.

Set 2: The Score adjusted by the level of confidence multiplied by the respondent's assessment of their LDAR authority.

①②③④⑤⑥: The number of celebrity respondents that selected this answer.

★: A respondent indicated that we were considering the wrong question OR an even better answer is available. This is the fun stuff! Stay Tuned.

#	Question	Answer	Set 1 %	Set 2 %	Celebrity Respondents
1.	How do you spell the word for the color that falls midway one the spectrum between white and black?	With an 'a'	47	38	①
		With an 'e'	53	62	⑤
2.	Can you monitor anything other than a valve installed upside-down with an extension probe?	Yes	24	23	
		No	13	11	
		Only with and articulable probe end.	63	66	⑥
3.	In Method 21, relating to Precisions Calibration, what does "3-month interval" mean?	Every 90 Days	11	12	① ★
		Every Calendar month	49	41	
		A period of time lasting from any day of the first month to one less than the same-numbered day of the fourth month (e.g. January 14 to April 13). This could be 89-92 days.	40	47	⑤
4.	The valve has to pass for 2 consecutive months before going on quarterly frequency. It passes in January. You cannot monitor it in February. It passes in March. Which is true?	March is the second of the two consecutive months.	25	25	② ★
		March is the first month of the two consecutive months.	75	75	③

5.	Which of the following is true of a double-block?	If there are two valves, at the end of the line it is a double-block and therefore not an OEL.	29	27	
		It is a double-block ONLY IF the second valve is situated far enough BELOW the first one to ensure full drainage and there is no inverted bend or trap in the piping between the two valves.	71	73	⑥
6.	If an NDE component leaks above 500, what do you do?	Nothing.	4	1	
		I have no idea.	43	24	
		Remove the NDE designation and treat the component like a normal component.	53	75	⑤
7.	How soon do you have to perform the first ReTest on a Texas RegV leak?	I am not from Texas and don't care.	24	24	
		By the 5th day.	55	49	②
		You can do it after the 5th day.	21	27	④
8.	Can you monitor a DTM at the annual frequency if you are using an extension probe while standing on the ground?	Yes	44	42	② ★
		No	56	58	③
9.	You monitor your annual components in December of 2015. How many months do you have to wait before can you monitor them again? (0 means January, 12 means December)	0	19	10	
		1	5	8	
		2	3	1	
		3	14	15	①
		4	22	33	④
		5	3	1	
		6	16	15	
		7	0	0	
		8	0	0	
		9	3	1	
		10	0	0	
		11	0	0	
		12	16	16	①
10.	Tag 17 leaks. You Attempt a repair and ReTest it. This results in a higher PPM that busts another leak. Does the Attempt and ReTest that you just performed satisfy the First Attempt and First ReTest for this new leak?	Yes	39	49	⑥
		No	61	51	

11.	Monthly pump leaks on Jan 28. It is repaired and passes a ReTest on Feb 2. Does this passing ReTest satisfy the monthly requirement for February?	Yes	32	27	
		No	68	73	6
12.	When it comes to removing a leaker tag, which is true?	This is really simple for us. I have no idea why we are even talking about it.	49	47	3 ★
		Our situation is somewhat complicated. I am pretty sure that we are doing it right.	30	39	2
		I have no idea of what we are doing or no confidence that we are doing it the best way.	21	14	
13.	When do you not have to repair a leak?	You always have to repair a leak.	42	30	
		Certain pumps at certain PPMs are leaks that do not require a repair.	58	70	6 ★
14.	If you bypass and purge a leaking component which is true?	That is not an attempted repair. You still have to “repair” and ReTest it.	42	47	5
		You can consider this a repair but you have to ‘monitor’ the open pipe to get a real ReTest.	23	22	1
		You can consider this a repair and you don’t have to ReTest something that is not connected.	35	31	
15.	If you remove a leaking component from service (gone, purged, out of here), can you close the leak?	Yes	78	77	4 ★
		No	22	23	2 ★
16.	What should happen to an iced-over component that needs to be monitored?	The ice must be cleared away so that the component can be monitored.	48	44	1
		Consider it Temporarily Unavailable. Do not monitor and make a note in the database.	19	17	
		Technician should just do the best he can. Monitor around the seams of the ice.	14	19	2
		Tech should do (3) and the Inspection Record should document an M21 Variance = Iced over.	19	20	3
17.	Is the Initial monitoring requirement triggered by the date the Component becomes active in the database or the date that a specific piece of equipment is installed at a component site?	When the component is made active in the database.	28	19	3 ★
		Anytime a new piece of equipment is installed at any component site.	72	81	3

18.	Which data should a frequent leaker assessment (for today) be based on?	All the leak records on any given component.	43	44	①
		Only the leak records associated with the actual piece of equipment that is installed as of today.	57	56	⑤
19.	If a technician suggests a data edit, the manager approves it and the site administrator processes it into the database, who should the database say "made" the change?	The Technician	19	19	①
		The Supervisor	28	32	④
		The Site Administrator	14	11	
		Each one should be recorded for the role that they played (Suggestor, Approver, and Processor).	39	38	①
20.	If you are over the x% limit for DTM levels in a certain unit, and you move 13 valves to quarterly monitoring, which is true?	They are no longer DTMs.	67	62	④
		They really are still DTMs.	33	38	②
21.	On February 1, you realized that you missed monitoring the pump in January. What should you do?	Schedule it for a Late monitoring event (for January) as soon as possible and monitor it again, later, for February.	78	73	④
		Forget about January. Just monitor February routinely.	11	17	②
		Monitor it for February as quickly as you can but don't do a late monitor event for January.	11	10	
22.	A Monthly/Month/Quarterly component leaks on a Quarterly month but the leak is for a regulation other than the one that created the MMQ specification. What do you do?	A leak is a leak. We have to go back to the Month/Month phase.	37	33	②
		The leak was not on the relevant Rule. We do not have to go back to the Month/Month phase.	63	67	④
23.	If you have a nonVOC in the same line with a VOC and you have different rules for monitoring, can the result of using one detector type be applied to the other compound?	Yes	36	32	② ★
		No	64	68	④
24.	When are you required to take two background readings for a specific inspection?	You are not. Never.	69	69	⑤
		Certain NDE specifications require this but nobody really does it.	14	11	
		If we could do, we would, when we needed to.	17	20	①

25.	How long should you monitor a tap hole?	Tap Holes are not allowed.	42	41	④ ★
		10 Seconds	29	22	
		It depends on the diameter of the component. The bigger it is the longer you have to monitor.	29	37	②
26.	You should confirm your drift measurements as a percentage of what value?	The PPM of the calibration gas you used that morning.	23	24	①
		The PPM of the confirmation reading you got when you tested your analyzer against the calibration gas value.	77	76	⑤ ★
27.	If you have decided that the Tech should sample for 60 seconds and then dwell at the highest deflection for 20 seconds and the tech identifies more than one deflection, which is true?	She should perform the 20-second dwell at every deflection point.	38	31	① ★
		She should perform the 20-second dwell at only the point of the highest deflection.	62	69	⑤
28.	Is “bumping” a pump (cycling off and on) a legitimate repair Attempt?	Yes	54	66	⑤
		No	46	34	①
29.	Is cleaning a component a legitimate repair Attempt?	Yes	92	89	⑤
		No	8	11	①
30.	A plug is screwed into a valve end. What is it?	A Threaded Connector that is a Plug.	68	70	⑤ ★
		Just an emission seam off the valve.	32	30	
31.	How should you manage UTM components that are only safe when the associated equipment is out of service?	Mark them as UTM. Attach a monitoring plan. You don’t have to do anything else.	49	53	③ ★
		Mark them as UTM and record with the component when the out-of-service events occur to demonstrate that you are paying attention to their status.	48	41	①
		Adopt a surrogate technique such as OGI, bench testing or pressure testing the component during the out of service period.	3	6	①
32.	How do you process AVO events on lube oils, refrigerants and heat transfer fluids?	They are not in VOC service, ignore them.	25	34	③ ★
		Track and repair but otherwise don’t bother with them.	50	63	①
		Treat these like real leaks. Process, repair and report them.	25	3	
33.	What is a check valve?	A valve	0	0	② ★
		A connector	75	66	② ★
		A valve that might have different frequency and emission parameters but it is still a valve.	25	34	①

34.	If I have a UTM component that I can monitor with an extension probe but have no safe way of repairing it if it is leaking.	Don't monitor it in the first place.	23	25	② ★
		Monitor and record "Unsafe to Repair" if it is leaking.	77	75	③
35.	What do you do if the background PPM in an area is above the leak definition?	Mark all the components as leaking and place on DOR list.	10	10	① ★
		Mark all the components as UTM.	14	17	② ★
		Mark all the components as Temporarily Unavailable and provide a comment to explain.	76	73	②
36.	A leak occurs that is NOT on a covered VOC component, such as pin hole in a piece of piping. What do you do?	Ignore it. It's not covered.	23	19	
		Create a nonCovered Component in the database. Record the leak and process the repair.	77	81	⑥
37.	A clamp or enclosure is installed over a leaking component. What should you do?	Mark the enclosed Component as DeActivated (OOS).	0	0	① ★
		Mark the enclosed Component as Temporarily Unavailable (if you are going to replace it at the next Shutdown).	67	62	① ★
		Place the item on DOR.	29	29	①
		Monitor the enclosure seams as emissions points on the valve. And place it on DOR if it is still leaking.	4	9	①
38.	Should the seams on the enclosure in the above scenario be considered a connector in the database and monitored routinely?	Yes	53	55	① ★
		No	47	45	③
39.	A repaired valve under some rule must be monitored again within 90 days after the repair. What does that mean?	Monitor again on the 90th day.	3	4	① ★
		Monitor again no later than the 90th day. It doesn't matter how quickly you monitor it.	47	44	①
		Monitor again no later than the 90th day but not sooner than X days. (Your X may be different from somebody else's X.)	50	52	④
40.	If an NDE component is found to be leaking (above the relevant leak definition), is it an automatic deviation?	Yes	31	29	
		No	69	71	③
41.	Which of the following is true if an elevated PPM is detected from a POEL with an OELCD in place?	Any PPM above background is an automatic deviation.	6	3	
		Any PPM above the relevant leak definition is an automatic deviation.	17	18	
		As long as the OELCD is in place, it is not a deviation. (But it may be a leak.)	77	79	③

42.	If the repair requires the unit to be cut back to minimum charge rates, does it qualify as technically infeasible to shut down?	Yes	45	40	②
		No	55	60	①
43.	Does the 3% DTM requirement apply to existing NSPS Subpart VV process units that become subject to Refinery MACT even though those units were not previously subject to the 3% limit in Subpart VV?	Yes	46	38	①
		No	54	62	②
44.	On a HON valve leak, when can you remove the leaker tag?	After the first passing ReTest.	31	38	②
		Only after the passing 90-day Delayed ReTest.	69	62	①
45.	On an MMQ (federal component) when can you remove the leaker tag?	After the first passing ReTest.	11	15	①
		After the passing m1 event.	11	9	
		After the passing m2 event.	78	76	②
46.	Considering Emissions Inventories, if the analyzer that was used pegs between 2 published Pegged Emission Rates (PER), which PER should be used?	The lower PER (say, 10,000).	15	14	
		The higher PER (say 50,000).	59	58	②
		A calculated (interpolated) value between the two.	26	28	①
47.	Considering Emissions Inventories, which of the following is most true?	You can and should “look back” to get a reading on an unmonitored component as far back as you need to get a reading.	37	41	③
		You can and should “look back” but you can’t look back more than x quarters.	34	31	
		You can’t “look back” at all.	29	28	
48.	Considering Emissions Inventories, which of the following is most true?	You can (but are not required to) use monitoring results that occur AFTER the end of the calculation period.	38	41	③
		You must use monitoring results that occur AFTER the end of the of the calculation period if they are available.	12	13	
		You may not use monitoring results that occur AFTER the end of the of the calculation period.	50	46	

49.	If a facility can feasibly lower the production rate (without a process unit shutdown) in a unit to repair a feed pump, can that pump be placed on the delay of repair list?	Yes, because lowering production rates is not a factor in determining technical infeasibility.	38	37	③
		No, technical infeasibility includes factors like production	62	63	
50.	Do all insulated valves need to be accessible to monitoring using insulation plugs?	Yes, for HON valve monitoring, according to the Dow ADI dated November 5, 2009.	47	45	②
		No, monitoring at the edge of the insulation is sufficient.	53	55	①