

Legacy Equipment Management Systems

This notice applies to site specific uncertified gas-fired process equipment in the Alberta Oil and Gas Industry installed prior to July 2013.

Section 3 of the Gas Code Regulation (AR 111/2010) states:

3(1) No person shall manufacture, install, sell or offer for sale any equipment related to gas systems for use in Alberta unless the equipment has been

- (a) Tested and certified by a certification body accredited by the Standards Council of Canada, or
- (b) Inspected and accepted by a certification body accredited by the Standards Council of Canada, and the equipment bears evidence of having been accepted in a manner authorized by the certification body.

The above clause is varied in **VAR-GAS-01-13** to include the following:

- (c) inspected and accepted by an inspection body accredited by the Standards Council of Canada, and the equipment bears evidence of having been accepted in a manner authorized by the inspection body, or
- (d) inspected and accepted by a Professional Engineer and;
 - the gas-fired process equipment bears a permanent rating plate compliant with CSA B149.3-10, supported with a stamped engineering report including the design and safety characteristics, as well as, a review of installation, commissioning and start-up records of the equipment;
 - the designs of the Professional Engineer shall be signed, sealed/stamped, dated and conform to the Gas Code Regulation, including the CSA B149.1-10, B149.2-10, B149.3-10 Codes, and the guidelines as described in Gas Safety Information Bulletin Standata G-02-13.

Section 5 of the Gas Code Regulation (AR 111/2010) states:

5) CSA Standard B149.1-10, Natural gas and propane installation code, published in January, 2010 by the Canadian Standards Association is declared in force with the variations specified in Schedule 1.

Section 6 of the Gas Code Regulation (AR 111/2010) states:

6) CSA Standard B149.2-10, Propane storage and handling code, published in January, 2010 by the Canadian Standards Association, is declared in force with the variations specified in Schedule 2.

The “Notice of Expiration of VAR GAS 05-05” notified the industry that as of January 1, 2015, all appliances and equipment utilizing gas as a fuel in the oil and gas industry shall be certified or approved as required by section 3 of the Gas Code Regulation.

Given the large inventory of equipment for some Oil and Gas Industry Operating Companies, it is recognized that bringing all equipment into compliance with the existing Gas Code Regulation may not be possible within the proposed timeframe. As an alternative, compliance to the following Legacy Equipment Management System (LEMS) is an acceptable alternative to the January 1, 2015 compliance date:

- 1) The Operating Company shall provide an inventory of all gas-fired equipment to the Chief Plumbing & Gas Administrator and make available to the local Authority having Jurisdiction (AHJ). This inventory shall contain gas-fired equipment installed for which no standard existed at the time of installation. This inventory shall be submitted prior to January 1, 2015.
- 2) Any gas-fired equipment installed under a previous Variance (VAR-GAS-04-04 or VAR-GAS-05-05) or under the current oil and gas Variance shall be deemed compliant provided an engineering documentation package is available that provides evidence of compliance and the equipment is equipped with a compliant rating plate.
- 3) The upgrading of existing gas-fired equipment for which no standard exists will be designed, installed and monitored under a LEMS initiated by the Operating Companies as a means to ensure compliance with the applicable Codes. Refer to Safety Tips for Gas Fired Appliances and Equipment.
- 4) The inventory shall be kept current for all gas-fired equipment used only for process applications in petroleum refineries, petrochemical plants and upstream oil and gas sites for which no standard exists and is not in compliance with the Gas Code Regulations. This inventory shall be updated then submitted to the Alberta Municipal Affairs Chief Plumbing & Gas Administrator on an annual basis.
- 5) The Operating Companies shall provide to the Chief Plumbing & Gas Administrator, an annual report showing compliance progress of this inventory. This report shall be submitted at the same time as the annual submission of the updated inventory of non-compliant equipment;
- 6) Each Operating Company, as part of its LEMS, shall conduct a risk assessment process in order to categorize the installed inventory of non-certified equipment ensuring that the equipment locations posing the greatest risk to the general public and to operating personnel are addressed as early as possible;
- 7) As the non-certified equipment is upgraded, the equipment shall be inspected for compliance to the codes in effect as stated in the current regulations;
- 8) Any gas-fired equipment associated with Petroleum Refineries and Chemical Plants that was installed prior to September 1, 2010 did not require a permit. Each Owner/Operator is responsible to ensure the installations will provide an acceptable level of safety and the correct operation of this equipment. Any alterations, extension, or additions to this equipment shall require a permit, and third party inspection if required as defined in the current regulations. Maintenance to existing equipment (both certified and uncertified) does not require a permit.

This information bulletin does not make or imply any assurance or guarantee with respect to life expectancy, durability or performance of equipment and materials.

To ensure that this information bulletin is reviewed for ongoing relevancy and necessity, with the option that it may be reissued in its present or amended form following a review, this informational bulletin will expire January 1, 2020.