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FAQ: Can “Movable” Equipment receive a CSA B149.3 Field Approval?

ANSWER: Yes it can.

Neither the CSA B149 Codes nor the provincial gas and electrical regulations currently address the “deployment time” of appliances or what happens with an appliance after it has been installed.

The assumption is that once an appliance is properly installed by a qualified and licensed installer (ie. gas fitter and electrician), field inspected, and found safe to operate, then it will remain safe as long as the owner of such appliance operates and maintains it according to the manufacturer's instructions. It is ultimately the owner's responsibility to make sure the appliance remains safe after the field inspection and into the future.

This assumption is mirrored by the permitting regulations, which require each appliance to have a physical address or land location specified on the permit application. The location is then used to determine the appropriate local authority having jurisdiction (AHJ) and where to purchase gas and electrical permits. There is currently no provision in the permitting regulation to deal with appliances that change locations. There is only a general statement that once an appliance is moved it must be re-inspected and re-permitted for its new location. This is based on the assumption of a stationary appliance that is moved to a new site.

So what happens if an appliance does not have a permanent location and no fixed address to put on a permit? One day it is in one municipality the next day in another because that is in the nature of its application. In many cases such “movable” appliances are mounted on a trailer or a skid, and clearly designed for “mobility”.

Following are examples of “movable” appliances

- Propane fired road repaving machine
- Road marking unit
- Gravel drier used for road construction
- Asphalt mixing machine
- Ground thawing unit
- Snow melting heater
- Grain dryer
- Thermal soil conditioner

- Portable heat treatment system
- Refractory curing burner
- Portable incinerator
- Line heater for well testing
- Temporary oil storage tank
- Temporary water tank (clean or produced water)
- Fracking water heater

The underlying intent of both gas and electrical codes and provincial regulation is safety. It is therefore safety that must be ensured when dealing with “movable” appliances.

FIELD APPROVALS

ENEFEN’s approach to “movable” appliances is based on the following:

- 1) Determine the nature of the gas appliance installation:
 - a) If the purpose of the appliance installation is of a temporary and predictable nature and less than or equal to 6 months in duration, after which the appliance is moved to a different location, the appliance is considered “movable”.
For example: fracking water heater used on location during the fracking procedure, then moved with the rest of fracking equipment to another location.
 - b) If the purpose of the appliance installation is of permanent and unpredictable nature or more than 6 months in duration, the appliance is considered to be “stationary”.
For example: oil storage tank connected to a well “until the well is exhausted” is unpredictable and therefore considered a “stationary” application.
 - c) If an appliance is used “seasonally” in a fixed location but moved for storage during off-season, it is considered to be of “stationary” nature.
 - d) If an appliance is used “seasonally” in several locations and moved for storage during off-season, it is considered to be of “movable” nature.
- 2) If an appliance is “movable” additional safety requirements include:
 - a) Procedure to safely disconnect and dismantle the appliance from its current location
 - b) Procedure to safely move/transport the appliance to a new location
 - c) Procedure to safely reassemble, reconnect and re-commission the appliance in its new location
 - d) A record (log book) of all moves including the dates, locations, and names and signatures of personnel involved in the move

- e) Signed and dated commissioning / combustion report of each move which includes a signed statement that the appliance was installed on the new site within the limits of its original field approval.
For example: if the appliance was approved only for use with clean water and natural gas, it cannot be used with any other liquid or fuel.
- f) ENEFEN field approval / rating plate shows “Movable” (skid mounted) or “Mobile” (trailer mounted) under the location.
- 3) If appliance is “stationary” (permanent), then the standard ENEFEN field approval process is used and the approval is valid for the life of the appliance (unless of course such appliance is altered or relocated). ENEFEN field approval / rating plate shows the physical location of such appliance.
- 4) If a “stationary” (permanent) appliance is moved to a new location but its application is identical to the previously approved application, ENEFEN offers a simplified field approval process. The client will provide photos of the installation to confirm it is the same and provide a new combustion report, but no field inspection from ENEFEN is required. A new ENEFEN field approval project number, report, and rating plate with new approval number and new location will be issued once this process is completed.
- 5) If a “stationary” (permanent) appliance is moved to a new location but its application has changed, the original approval is void and must be redone. A new ENEFEN field approval project number, field inspection, report, and rating plate with new approval number and new location will be issued as per the standard process.

PERMITS

- 1) Installation permits are subject to the regulations of the local AHJ (Authority Having Jurisdiction) and only apply to the piping and wiring upstream of the appliance disconnect devices (ie. fuel gas manual shut-off valve and electrical disconnect device on the appliance). Piping and wiring downstream of these disconnect devices are part of the appliance itself and are included in the ENEFEN field approval and are exempt from the provincial permits.
- 2) In most areas of Alberta, with the exception of some jurisdictions, there must be a gas and electrical installation permits obtained for the “stationary” appliance from a local Accredited Municipality. In non-accredited municipalities these permits must be obtained from Alberta Municipal Affairs.
- 3) For “movable” appliances, including rental equipment, gas and electrical permits must be obtained from the area where the appliance is normally stored and maintained between deployments (ie. rental company storage yard) even though there is no piping and wiring upstream of the disconnect devices to inspect.
- 4) More information about permits can be found on the Alberta Municipal Affairs website http://www.municipalaffairs.alberta.ca/cp_permit_information