



Safety Codes Council

MINUTES OF THE SECOND GAS SUB-COUNCIL MEETING OF 2017

DATE: May 25, 2017

TIME: 9:00 a.m. to 2:15 p.m.

LOCATION: Radisson Hotel, Edmonton

PRESENT: **Sub-Council Members**

Glen Aspen, Chair	Alberta Prov. Pipe Trades Assoc.
Simon Jolly	Mechanical Contractors Assoc.
Jason Helfrich	Canadian Propane Assoc.
Chuck Lemke	Sheet Metal Contractors Assoc.
Nathan Lesage	Small Provincial Gas Distribution Business
James Maddocks	Professional Engineers
Marcel Mandin	Vehicle Conversion Business
Verne Quiring	Manufacturer or Supplier Business
Jeff Skeith (until 12 noon)	Federation of Alberta Gas Co-ops
Blaine Smetaniuk	Major Gas Distribution Business
Mike Turek	Alberta Mechanical Officials Society
Denis Turgeon	Training Institutes

Safety Codes Council
Gerald Baron

Alberta Municipal Affairs
Sidney Manning, Claude Valliere, Harry Li, Kristopher Schmaltz, Iain Ilich

ABSENT: Bradley Gaida

GUESTS: Geoff Kutz, Pressure Equipment Sub-Council; Randy Saunders, NOVA Chemicals

RECORDER: Sandi Orr

2017 MEETINGS: September 21 – Edmonton

1. Meeting Opening

The meeting was called to order by the Chair at 8:56 a.m. and a round table introduction was held.

1.1. Agenda Adoption

The following item was added to the agenda:

- 4.6. – Temporary Heat

Jeff Skeith / Vern Quiring moved to adopt the agenda, as amended; CARRIED

1.2. Previous Minutes

1.2.1. Adoption of February 2, 2017 Minutes

Chuck Lemke / Jason Helfrich moved to adopt the minutes of February 2, 2017, as circulated; CARRIED

2. Matters for Decision [Motion Needed]

2.1. Appointments

It was reported that the Gas Sub-Council matrix policy recommendation was approved by the Board to allow for both a Calgary and Edmonton representative.

The Council was asked to follow up with Edmonton and Calgary to reaffirm their nominees.

[Council Administration]

3. Review Matters Arising / Action List

Date	Action	Responsible	Status/Update
Sep 15, 2016	Review and confirm Terms of Reference for all Working Groups	Karch	In progress
Sep 15, 2016	Working Group Review added to agenda	Karch	Completed, removed from action list
Sep 15, 2016	Chief Administrator will work with CSA on what can be shared RE code change proposals	Manning / Valliere	In progress
Sep 15, 2016	Members encouraged to review latest draft of Combination Heating STANDATA UPDATE: Glen Aspen volunteered to serve on Joint Working Group	All	In progress
Sep 15, 2016	Chief Administrator will work with BSC/L. Girard/D. Reinhart on Building Openings STANDATA UPDATE: Discussion will need to be held once new representatives from large municipalities are appointed	Manning	In progress
Sep 15, 2016	Update Edmonton and Calgary on recent nominees considering the potential to add a seat to have concurrent representation of both cities.	Karch	In progress

Sep 15, 2016	Clarification needed in Safe Temp Propane Heat materials about vapourizers relative to province-wide variance recently issued	Karch/Whiteman	Completed, removed from action list
Sep 15, 2016	IGAC Report – public document will be circulated to members	Manning	In progress
Sep 15, 2016	Add Direct Fired Process Air Heater STANDATA to the portal for review at Feb. meeting	Manning	On agenda under STANDATAs
Sep 15, 2016	Bring forward proposal for review by AMA and ASCA regarding potential exemption that could be included in the permit regulation. UPDATE: Letters of support from other utilities have been sent to AMA.	Skeith	In progress

A brief update was provided on the excessive work to create the three-column documents for all the CSA Standards. Clarification was provided regarding the update of the CSA-B109-14 – Natural gas for vehicles installation code to add LNG within the current version. It was noted that the last SCO update training does not have these code changes and they will need to be added in the next code update training.

4. Matters for Discussion

4.1. Permit Regulation Review

Kristopher Schmaltz was welcomed to the meeting and provided a presentation on the Permit Regulation Review:

- Expiry has been extended to January 2019
- This is the initial consultation to gather feedback on principals and potential changes that may be needed to the Permit Regulation
- Beginning with defining what a permit is and what it is not
- Overview was provided of the scope and principles
- Scope of the review
 - Reviewing the policy objectives of the regulation
 - Identifying issues, challenges and gaps
 - Identifying solutions through policy, amendments or other adjustments to the safety system
 - Reviewing technical requirements for each discipline

The following questions were asked:

1. Issues or challenges with the Permit Regulation?
2. Are we requiring permits for the right things?
3. Are we permitting too many things or not enough?
4. When should permits be required or not be required?
5. What is the value / benefit of permits?

The following feedback was provided:

- Questioned regarding the difference between a Permit and a Permit Application
- The Act already identifies responsibility being the owner but the Permit should be affirmation of accountability
- Expectation that a permit includes timely inspection
- Individual has paid money for the permit, what have they purchased – e.g. paying for

- inspection services in advance
- Potential education piece for homeowners of the requirement to call for an inspection when the work is finished
- Perhaps Permit Regulation should identify what is needed to obtain a permit
- New Home Warranty Program has created some consequential challenges relative to permits
- Permitting requirements should be considered for:
 - HVAC equipment for AC only require an electrical permit
 - Heavy industrial well sites
 - Venting should always require a permit, particularly for replacement of space heating appliances (e.g. going from metal to plastic venting is a design change)
 - Seasonal permit for temporary heat, lots of confusion and inconsistency across Alberta for permits
- Challenges with appliance replacements
- No assurance that there is compliance if there is no inspection
- No assurance that the qualified person pulling the permit that the work is being done by a qualified person (e.g. one person pulling thousands of permits for a company)

Members were asked to provide any additional feedback to AMA (kristopher.schmaltz@gov.ab.ca). [All]

4.2. Commentary on Gas Code Requirements for Large Industrial Fired Heaters

Geoff Kutz, PESC and Randy Saunders, NOVA Chemicals were welcomed to the meeting and provided a presentation on the Alberta Variance Expiration Discussion.

An overview was provided on NOVA Chemicals Joffre history, the types of equipment in use, the processes developed to improve safety for fired equipment and their own fired equipment engineering standard based on industry best practices.

An overview was provided of their experience and challenges with the CSA B149.3 Code and the province-wide variance because the code is not aligned to 24/7 integrated process facilities with highly trained operators and the code does not recognize hazards associated with tripping equipment off-line. The code partially recognizes the IEC61511 standard but does not recognize use of this standard in place of prescriptive code requirements.

Relative to the Variance, there were challenges with Professional Engineer Approval. Engineers were reluctant to approve due to perceived liability and this resulted in defaulting to third party experts. There is a need for significant fired equipment and code expertise to manage equipment/program and ensure ongoing code compliance.

An overview was provided of the benefits of the variance which allows to build programs and processes, the use of IEC 61511 standard and that it reinforces owner accountability for safe design and operation.

An overview was provided of NOVA's experience with Inspection and Certification bodies on three projects underway and some of the challenges that are being faced because not all Inspection Bodies have the necessary experience with fired equipment. Although many have experience with evaluating complex equipment, none have that experience with pyrolysis furnaces. This creates a reluctance for accepting any deviations from the code.

An overview was provided of the uncertainties including the consistency and qualification of inspectors, code interpretations and conflicts, and code deviations. Examples of deviations were provided. Issues that needs to be resolved are to document a clearly defined level of authority for IB's and CBs in the field approval of fired equipment for code interpretations, deviations, process for resolution of disagreements, process for alterations, consistency of inspectors, and the authority of a new CB/IB over equipment approved by another (e.g. IB/CB no longer in business, etc.), the allowance for the use of EC61511 and jurisdictional issues in Owner/User Facilities STANDATA G-03-11-ABSA.

An overview of NOVA's current path forward was provided.

The floor was opened for questions and the following noted:

- There was understanding of the concern regarding inconsistencies of IB/CB, but this same thing occurs with Safety Codes Officers too
- Regarding the concern about Variances needing to be proved for safety equivalency if a new IB/CB, it was clarified that once a variance has been approved it remains in place unless changes have been made
- Regarding issues with CSA B149.3, there are differences of opinion in the technical committee regarding prescriptive requirements vs. performance requirements
- Good questions are being asked

It was questioned regarding whether the presentation could be shared with AMA and/or the Council so that the questions and concerns could be reviewed. [Saunders / Kutz]

The Gas Administrator indicated that he would be willing to answer questions/concerns to provide clarity for industry. [Manning]

4.3. STANDATA Draft review

It was reported that another Certification Body is now certified and the STANDATA will be updated and republished.

4.3.1. Direct Fired Air Heater STANDATA

The draft Direct Fired Air Heater STANDATA was shown on screen. An overview was provided of the changes added recently and the rationale for the changes.

A copy of the draft Direct Fired Air Heater STANDATA will be placed in the portal for all members to review. [Manning]

Members to provide feedback to the Gas Administrator prior to the September 2017 meeting [All]

4.3.2. Mobile/Temporary Cooking Equipment

The draft Mobile/Temporary Cooking Equipment STANDATA was included in the portal and reviewed.

Mike Turek / Verne Quiring moved to support the publishing of the Mobile/Temporary Cooking Equipment Joint STANDATA; CARRIED

4.4. Review of Working Groups

The working group members were reviewed and reaffirmed as follows:

STANDARD	WORKING GROUP MEMBERS (<u>Chair</u>)
CSA-B149.1-15 – Natural gas and propane installation code	<u>Verne Quiring</u> Jeff Skeith; Mike Turek; Denis Turgeon; Simon Jolly;
CSA-B149.2-15 – Propane storage and handling code	<u>Jason Helfrich</u> Jeff Skeith; Mike Turek; Verne Quiring; Denis Turgeon
CSA-B149.3-15 – Code for the field approval of fuel-related components on appliances and equipment	<u>Verne Quiring</u> Glen Aspen; Denis Turgeon; James Maddocks
CSA-B149.5-15 – Installation code for propane fuel systems and tanks on highway vehicles	<u>Marcel Mandin</u> Jason Helfrich; Nathan Lesage (AMA – Perry Wager)
CSA-B108-14 – Natural gas fuelling stations installation code	<u>Nathan Lesage</u> Marcel Mandin; Blaine Smetaniuk or designate
CSA-B109-14 – Natural gas for vehicles installation code	<u>Marcel Mandin</u> Nathan Lesage; Blaine Smetaniuk or designate

The CSA-Z276-11 or 15 – Liquefied natural gas (LNG) Working Group was disbanded as this is now under the jurisdiction of Alberta Energy.

The Third-party Certification Working Group was disbanded. It was suggested that any further discussion regarding this morning's presentation be considered a new agenda item.

An update was provided regarding the new code adoption process.

An additional meeting room will be arranged for the next meeting to allow for private working group discussions. [Council Administration]

4.5. Updates from March 7 TCC Meeting

The Chair provided a brief overview of the topics on the agenda at the last Technical Coordinating Committee meeting:

- Builder Licensing Consultation
- PESC Chair raised the issue regarding the expired variance
- Combination Heating STANDATA

4.6. Temporary Heat

It was reported that the Heating Refrigeration Air Conditioning Institute (HRAI) has published a document regarding the use of furnaces for temporary heat. The following statement will be included with all gas furnaces from every manufacturer:

- Gas furnace manufactured on or after May 1, 2017 are not permitted to be used in Canada for heating of buildings or structures under construction.

The industry is getting different interpretations from various authorities having jurisdiction. Some AHJs are saying they will enforce and others will not. This is causing issues with industry and organizations like the Homebuilders Association. It was questioned what the issue is and clarified that the primary issue is drywall dust. The challenge is that there is limited viable options available for temporary heat.

From an inspection perspective, it is out of the control of the gas inspector if the furnace is connected and used after the inspection. It is believed that this is more a warranty issue.

It was explained that when appliances are certified, they are tested for a particular use. If an appliance states that it is not for use during construction, it is because they are not being evaluated under those conditions. Some builders are wanting to install a furnace specifically for temporary heat and then replace with a new heater for warranty purposes. But this would not be allowed if the furnace cannot be used.

It was noted that future homeowner basement development will also be affected. An SCO would accept it as an installation of an appliance. If the appliance is in use, manufacturer's instructions can be enforced by the SCO. The SCO should be demanding the appliance be removed and replaced to ensure due diligence. It was further emphasized that ultimately it is the responsibility of the owner.

It was also noted that if a builder is consistently using an appliance that is not for use during construction, administrative penalties may be a means of ensuring compliance.

After the meeting in June, a Tip Sheet or STANDATA will likely be drafted and is being proposed to include the definition of substantial completion for residential construction and clarification regarding SCO inspections. It is hoped that the approach will be relatively consistent across Canada.

It was further clarified that the installer can lock-off the appliance and not unlock it until construction is complete.

5. Other Business and Meeting Finalization

5.1 Other Business

A round table discussion was held. Members were reminded of the working group meetings being held after the meeting was concluded. All sub-council members were invited.

5.2 2017 Meetings

The next meeting was reconfirmed for Thursday, September 21, 2016 in Edmonton at 9:00 a.m.

5.3. Meeting Adjournment

Denis Turgeon / Verne Quiring moved that the meeting be adjourned; CARRIED

The meeting was adjourned at 2:15 p.m.

--- NEW ACTION ITEMS ---

2.1. Appointments

The Council was asked to follow up with Edmonton and Calgary to reaffirm their nominees.
[Council Administration]

4.1. Permit Regulation Review

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The Gas Administrator will answer the questions/concerns to provide clarity for industry. [Manning]

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A copy of the draft Direct Fired Air Heater STANDATA will be placed in the portal for all members to review.
[Manning]

Members to provide feedback to the Gas Administrator prior to the September 2017 meeting [All]

4.4. Review of Working Groups

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[Council Administration]

--- MOTIONS ---

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