

BPVR Decommissioning Directive: What We Heard

Introduction

From January 12 through February 3, 2024, Technical Safety BC engaged with BPVR clients (owners, licensed contractors, and permit/certificate holders) on a proposed directive which aimed to address the following:

1. Specify decommissioning requirements for regulated products under the Power Engineers, Boiler, Pressure Vessel, and Refrigeration Safety Regulation.
2. Define the responsibilities of owners and licensed contractors in connection with regulated products and decommissioning activities.

Summary of Responses

Participants responded to an online survey and discussion forum asking about their level of support in the drafted BPVR decommissioning directive. The comments below summarize the feedback received.

Are you supportive of Technical Safety BC defining roles and responsibilities as they relate to the decommissioning of regulated equipment?

100% in support of the directive in defining the roles and responsibilities related to the decommissioning of regulated equipment.

Does the proposed directive clearly address the roles and responsibilities associated with the decommissioning of regulated equipment in your industry group?

SURVEY RESULTS
80.6% found the proposed directive clear

19.4% had questions about the directive.

Some participants found that the directive lacks clarity in terms of the following:

- definitions (licensed contractor, alteration),
- criteria (appropriateness of class of license/certificate of qualification),
- responsibilities of owner-operator when they are separate entities,
- scope of work,
- worker safety,
- risk assessment
- replacement in kind repairs, when does regulated work counts as an alteration,
- how to go about the update of ESA manuals and its impact on other owner-operators,
- and design registration requirements for removal or replacement as CSA B51 requires regulatory review for all alteration.

Outreach and Participation

We notified 23,000 BPVR clients and various associations by email. In total, 40 participants provided feedback during the consultation period.

Method	Participants
Survey	31
Forum	6
Email	3

Does the proposed directive clearly address the roles and responsibilities associated with the decommissioning of regulated equipment in your industry group?

SURVEY RESULTS
64.5% believe no further improvement is needed

35.5% seek further clarification on decommissioning

Participants suggested key improvements to the directive, emphasizing the need for further clarification. Their recommendations include:

- refining the definitions for unservicable water boilers and decommissioning,
- clarifying whether an immediate mandatory submission of FRM1539 upon decommissioning is required,
- defining roles (who are qualified) for NH3 hazard removal, ensuring that only certified operators run equipment,
- adding the role of Chief Engineers as one of those who can make decommissioning decisions (when and how),
- providing hazard awareness training,
- introducing standardized decommissioning forms (Form 1359),
- implementing detailed work procedures in the Contract Awarding Process,
- expanding asset statuses in the Bulk Loading Operating Permit tool,
- establishing minimum inspection requirements,
- maintaining comprehensive equipment records (history of plan/ equipment) that would help simplify inspection,
- and consider introducing a "final decommissioning permit/certificate" or Form 1539 for confirmation (keeping a copy with the permits and posting of this form/certificate).

Do these clarified requirements pose challenges for you as an equipment owner, business owner, or qualified individual, etc.?

SURVEY RESULTS
93.5% reported no issues with clarified requirements,

6.5% had expressed some concerns

Some participants anticipate challenges with the directive, including:

- issues related to Hazard Assessment,
- alignment of the ESA manual with the directive's definition of alteration,
- and concerns about potential misinterpretations and conflicting processes, particularly concerning the Bulk Loading Operating Permit tool.

Participants recommends the following:

- alignment between Technical Safety BC and industry groups to address the challenges.
- further clarification and improvement of the directive

Forum Discussion

Do these clarified requirements pose challenges for you as an equipment owner, business owner, or qualified individual, etc.?

While most contributors expect no problems in complying with the directive:

- need for more explicit guidelines and timelines for the various ways of taking equipment out of service, including maintenance, future use, and decommissioning

Do these clarified requirements pose challenges for you as an equipment owner, business owner, or qualified individual, etc.?

Most contributors do not think there will be problems with the process. Although there were some expressed concerns:

- directive seems to suggest getting rid of unserviceable vessels, which could cause misinterpretation as these vessels could still have a future use.

Next Steps

Following the closing of the digital engagement on this Directive, we will review and consider the feedback we receive. We will communicate to all clients to provide an update regarding effective dates for the BPVR industry on the outcomes and the effective date of any changes.