

Mr. Ed Ferrero
Acting Boiler Safety Manager
B.C. Safety Authority
April 30, 2008

Since I met with you on Jan. 3, 2008 to review previously documented issues, the B.C.I.P.E. Legislation Committee has met to prioritize concerns we have with the Power Engineer, Boiler, Pressure Vessel and Refrigeration Safety Regulation. The following are our main concerns.

In our document of concerns with the new regulation presented to Malcolm Bishop in 2004, we made it clear that Section 19 (b) (iii) should be changed to say, " for a period of at least 18 months in the operation, design, construction, repair or maintenance of equipment to which this regulation applies **and is reviewed by a Safety Officer**, and have successfully completed..." It is important to us that the experience of the individual applying be scrutinized and the scrutiny be accounted for.

We first mentioned Section 38 (1) in our 2004 list of concerns and subsequently the Safety Authority has moved in the opposite direction from our suggestion. We asked for a change to allow the applicant to monitor a boiler in a plant named in the certificate; however, in the Proposed Amendments to the Regulation, the Safety Authority is opening it up to a boiler in any boiler plant that has been registered as a general supervision or risk assessed status plant. This is unacceptable. A boiler safety awareness certificate cannot be used to allow an individual to monitor any number of boiler plants. This is particularly true when it is the Safety Authority's intention to eliminate the ceiling on special plants in Sections 55 and 56, which we are vehemently opposed to. In total, this is a clear erosion of safety.

We mentioned in our 2004 concerns that Section 46 (5) should be removed simply because it further confuses the issue of refrigeration plant capacity. A better effort is required to clarify refrigeration plant capacity.

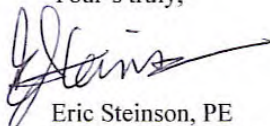
The proposed change to Section 60 in the Proposed Amendments gives much too much power to the Safety Manager. Every effort must be made to review proposed changes to the regulation with all affected parties before they take place.

Deleting Sections 76 and 79 of the Regulation is not acceptable to us. For example, we believe the section on Recovery Boilers is an important regulation governing these very dangerous boilers. We feel strongly that this section must remain intact. We don't see how the BCSA can assume that owners will follow BLRBAC recommendations on their own volition. Regulations are required to ensure compliance.

We do not believe that Section 86 is redundant. Boilers are operated throughout this province with the current PEBPVRs Regulation close at hand. The General Regulation and Act are not consulted nearly as often.

Please give our priority concerns your serious consideration.

Your's truly,



Eric Steinson, PE
Chair, Legislation Committee
Institute of Power Engineers
Vancouver Branch