Policy notes



Amendments to the Regulation allow employers to use engineered restraint systems that offer equal or better protection to workers than the traditional wire and chain models.

Regulations amended for flow piping systems

Following public consultations and hearings, amendments to the Occupational Health and Safety Regulation for oil and gas flow piping systems took effect on August 1, 2017. Here's what you need to know.

Generally, the amendments to Section 23.69 of the Regulation enhance, clarify, update, and / or expand existing regulations on:

- The integrity-assurance program for flow piping
- The selection, installation, operation, and inspection of flow piping systems
- · Engineered restraint systems
- Related issues such as pressure-testing requirements

Who will be affected?

Oil- and gas-sector employers in upstream petroleum, and those running processing operations such as gas plants, refineries, and bulk storage facilities.

What's changing?

Some of the highlights include definitions, restraint systems, and integrity assurance, as noted here. But employers should review Section 23.69 for full details of all the changes.

The definition of flow piping systems

The new definition clarifies the type of flow piping systems that are covered by this section: The requirements apply to temporary or portable above-ground piping systems used to convey liquid or gas under pressure to or from a wellhead. These activities include drill stem testing, swabbing, cementing, well servicing, and stimulation.

Restraint systems

Employers were formerly required to use specific wire-rope safety lines or chains to secure their piping systems. The amendments allow employers to use other engineered restraint systems that offer equal or better protection for workers.

"With the amendments, the Regulation now aligns with practice in the field for the last year and a half," explains Budd Phillips, WorkSafeBC manager, Prevention Field Services.

Each flow piping system needs an engineered restraint system designed and manufactured specifically for that purpose.

"Employers have two options based on the type of pressure the pipe will be under," he says. "Buy from a manufacturer, or have one made and certified by an engineer who will ensure it is adequate for the intended purpose."

Integrity-assurance program

The amendments broaden the scope of the integrity-assurance program, commonly known as an O&M (operations and maintenance) program.

"Employers are now required to implement an effective program regardless of the type of well operation or anchor used," says Phillips. "It's really a non-destructive testing inspectional process."

Employers need to select flow piping systems based on the anticipated operating conditions, install them according to the manufacturer's instructions, and assign a qualified person to administer the program.

Why were these changes made?

Many of the changes to Section 23.69 of the Regulation reflect current practices and / or the use of new technologies and equipment. The amendments aim to ensure flow piping systems are safely operated and properly restrained.

Advancing technologies allow for greater operating pressures of flow piping systems than noted in the former requirements.

In addition, over the last few years, WorkSafeBC has received variance requests to allow other restraint systems. These changes are the result of input from

subject-matter experts including workers, employers, and industry members, as well as from public consultations and hearings held by WorkSafeBC.

The integrity-assurance program formerly focused on high-pressure piping used in wells. It was broadened to encompass all uses of temporary or portable flow piping systems.

Where can I get more information?

Full descriptions of the changes can be found on the Law and Policy pages of worksafebc.com, under "Closed Public Hearings and Consultations."

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Did you know?

Our prevention team is available to consult with organizations to help them maintain healthy and safe workplaces.

WORK SAFE BC



The BCCSA has developed the Silica Control Tool as a resource for the construction industry in BC. The Tool assists employers in conducting appropriate risk assessments and implementing effective controls and safe work practices where RCS dust may be an occupational hazard. The Tool identifies processes that may lead to exposures over the allowable exposure control limit, provides information about how to bring the exposure within the allowable limit, and produces a corresponding Exposure Control Plan (ECP) for the user.

EMPLOYERS' KEY BENEFITS

- Help to ensure the health & safety of workers engaged in RCS dust producing processes.
- Assist in complying with the requirements of the OHS Regulation relating to assessing & controlling RCS dust exposures to below the allowable exposure limit.
- In some situations, eliminate the need for air monitoring tests for planned work processes, which is particularly helpful given that testing can often be challenging on construction sites because of short duration of work, and changing nature of activities.
- Preparation of specific process-based ECP templates that can be tailored for each jobsite.

The BCCSA Silica Control Tool can be a valuable aid to qualified persons in conducting RCS dust risk assessments, selecting and implementing controls and developing ECPs. However, the Tool is NOT a replacement for professional advice or jobsite air monitoring tests as may be needed. Jobsites and construction projects can be highly complex with unique variables and ever changing nature of work. The Tool does not purport to provide a conclusive output for every possible RCS dust producing process. Employers are ultimately responsible for taking whatever steps are needed to ensure that the requirements of the OHS Regulation are met

