Update

FUELS UPDATE EDITION

Issue 1
2012

IN THIS ISSUE

Message from the Director

By **John Marshall,** BA, CIGC, Director of Fuels Safety Program

As seasons change throughout the year so too do our activities. Now that spring has sprung and summer is at our doorstep there is a resurgence of activities as excavation, landscaping and construction kick back into high gear.

With that said, this is as good a time as any to keep in mind the importance of excavation safety – and particularly so as pipeline damages were the leading cause of occurrence inspections last year.

And, while, thankfully, there were no fatalities or injuries associated with these incidents last year, the damages to infrastructure are costly and may impact public safety. In an effort to better understand the root causes of pipeline damages, the Technical Standards and Safety Authority (TSSA) introduced an enhanced strike inspection documentation process in fiscal year 2010/2011 which allows for specific reasons for pipeline strikes to be analyzed and addressed. Since this process has been in place, analysis indicates that 68.68% of strikes are due to improper excavation practices. Therefore, we must all continue our due diligence when it comes to excavation and pipeline safety. While we may all have our own individual roles, public safety is a shared responsibility.

Clearly, obtaining locates is the first vital step in proper excavating practices.

From industry's perspective this means taking into account and adhering to the prescribed requirements as set out in the *Technical Standards and Safety Act, 2000,* the *Electricity Act, 1998*, the *Occupational Health and Safety Act*, and applicable regulations in the *Guideline for Excavation in the Vicinity of Utility Lines.* Of paramount significance and something that cannot be stressed enough is the importance of obtaining locates. Prior to excavation, the person responsible for the work must request a locate through Ontario One Call or the utility, and request a locate of utility lines in the areas where excavation will be taking place. The Excavator must receive the locate prior to commencing any excavation. For those circumstances where an area is not serviced by Ontario One Call – as not all utilities belong to Ontario One Call – the local municipality must be contacted for information on utilities in that area and then the utility must be contacted directly for locate requests. Be prepared and ready to provide relevant information describing the location where the work will take place, the expected time when the work will begin, the scope and nature of the work, the expected duration, the name, address and telephone number of the Excavator and the name of the Excavator's site representative.

Clearly, obtaining locates is the first vital step in proper excavating practices. Recognizing the importance of this, TSSA has and will continue to support the Ontario Regional Common Ground Alliance (ORCGA) – an organization promoting efficient and effective damage prevention for Ontario's vital underground infrastructure – in a number of initiatives including the implementation for one call legislation, to further reduce pipeline damages and enhance public safety. Currently, requesting a locate may require calling as many as 13 companies in order to obtain all the locates. Mandatory legislation requiring everyone to belong to a one call system with only one number to call will result in less chance that people will not call and/or something will get missed.

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LIQUEFIED NATURAL GAS AS A FUEL FOR TRANSPORTATION IN CANADA AND USA

By Oscar Alonso, P.Eng., Engineering Specialist, Fuels Safety Program

Liquefied natural gas (LNG) has been used in pilot projects with buses and trucks in Ontario for a limited time. These projects demonstrate that LNG is a viable alternative, although certain technical and practical challenges arise. LNG needs to be stored in tanks that look similar to propane storage tanks in filling plants but, as LNG needs to be maintained at a temperature of approximately -160 °C (-260 °F), the tanks and components used must be made of special materials, capable of handling cryogenic fluids. These tanks are double walled and thermally insulated by vacuuming the space between the inner and outer tank. Additionally, there is only one plant in Ontario that produces LNG and one in Québec, which are the closest to the areas where LNG is needed.

As of now, there hasn't been much action taken to expand the use of LNG as a transportation fuel; however, the picture is changing in North America. New and abundant sources of natural gas in the U.S. are generating changes in energy policies that will have an effect all across the region, particularly in Ontario. Wells drilled through the Marcellus Shale formation that occurs in the subsurface of Ohio, West Virginia, Pennsylvania, New York and small areas of Maryland, Kentucky, Tennessee and Virginia have increased the known reserves of natural gas. At the rate of U.S. consumption in 2010, that may be enough natural gas to supply the market for over 100 years.

The Marcellus natural gas field, closer to Ontario than the Alberta fields, will have an impact on natural gas transportation in Canada. Ontario would increasingly receive gas from the north-eastern states as the cost of transportation will be significantly less.

This new situation will make natural gas and particularly LNG more attractive as a fuel for transportation. The infrastructure to supply LNG to trucks (or other vehicles) will require the installation of LNG refuelling stations along "corridors" or highway systems like the 401/20, between Montréal and Windsor. These refuelling stations would need to be located in areas of low density population and a risk and safety management plan would need to be developed, similar to the one applicable to propane filling plants.

Vehicles need special fuel tanks to store LNG on board, as well as components that can safely handle the low temperature liquid up to the vapourizer. Components downstream of the vapourizer are of the same type as those used for compressed natural gas (CNG).

One of the present problems with which we are confronted is the lack of specific code requirements to design and approve LNG refuelling stations, though there are codes for large liquefaction and storage of LNG. In order to deal with these issues, TSSA's Fuels Safety Program is working with Canadian Standards Association (CSA), Canadian and U.S. agencies and other stakeholders to include requirements for LNG refuelling stations as part of the CSA Z276 Standard. In the meantime, TSSA's Fuels Safety Program has approved one LNG refuelling station in Mississauga within a truck transportation facility to initially refuel a fleet of 80 trucks. The facility and the trucks are operational since January 2012.

FUEL OIL DISTRIBUTOR INSPECTIONS

By Raphael Sumabat, P.Eng., Engineer Specialist, Fuels Safety Program

Back in June 2001, Ontario Regulation 213/01, Fuel Oil, was passed requiring fuel oil distributors be satisfied that all fuel oil related equipment to which they supply fuel oil is compliant with the requirements outlined in the regulation. This legal requirement was put in place to best assure continued safe operation and use of fuel oil equipment in Ontario.

There are no exemptions for distributor inspections. All installations must be inspected at least once every ten years by a certified technician registered with TSSA – this includes residential dwellings, hospitals, industrial facilities, power plants, water treatment facilities, water pumping stations, farms and greenhouse operations, etc.

As fuel distributors complete their periodic inspections of all installations, distributors are reminded to pay particular attention to the following.

Unregistered Underground Tanks

All underground (buried) fuel oil tanks are required to have a registration number from TSSA. Underground fuel oil tanks were required to be upgraded by October 1, 2009. Fuel cannot be supplied to unregistered underground fuel oil tanks.

Generators are Appliances

Diesel generators are classified as appliances under the Fuel Oil regulation and all generator installations must be inspected for compliance with the code and regulations. While generators are exempt from certification, the installation including the tank system must comply with the code.

Unapproved Appliances

Inspections must verify that all appliances that consume fuel at an installation are approved. The appliance as an assembly, or as a 'whole', must be certified – it is not sufficient that the burner alone is certified (e.g, CSA or ULC certified). This includes appliances such as furnaces, heaters or dual fuel boilers where fuel oil is used as a back-up at large boiler plants.

For more information on distributor inspections, visit the Fuels Safety section on TSSA's website at http://www.tssa.org/regulated/fuels.

GENERATOR SYSTEMS

By Raphael Sumabat, P.Eng., Engineer Specialist, Fuels Safety Program

Proper and safe installation procedures are critical elements in the overall safety of operating equipment. And when it comes to installation requirements for generator systems they are treated no different than other appliances such as boilers and furnaces. In other words, generator installations must meet all the requirements of the CSA-B139ON-06, *Ontario Installation Code for Oil Burning Equipment*, including the fuel supply system, the combustion, air, ventilation and the exhaust/vent system.

In those instances where a generator installation is discovered to be non-compliant with the installation code, it is vitally important that appropriate action be taken to address the non-compliance (issue). Specifically, contractors, certificate holders and fuel distributors must follow the requirements outlined in sections 22-26 of Ontario Regulation 213/01, Fuel Oil, for "unacceptable conditions". These requirements include: written identification of the non-compliance; time specified for correction; notice to the user, operator and distributor; and termination of the fuel supply if not corrected within the specified time frame.

It is also important to note and keep in mind the following requirements/ information associated with three main areas of non-compliance that TSSA has identified during the course of its inspection activities.

1. Unapproved Components

Section 3.1.1 of CSA-B139ON-06 requires components used in an installation to be certified. This includes tanks, filters, and valves.

If a certified component is not available in the market, a variance may be requested. TSSA will review the variance application for unapproved equipment to verify if it is certified in the U.S. or if a professional engineer has assessed the component for the suitability of its installation.

2. Combustion Air Dampers are not Interlocked with the Generator

Section 4.4.1.5 of CSA-B139ON-06 requires combustion air dampers to be interlocked with the generator. The "interlock" is often misinterpreted. Under section 4.4.15, "interlock" means that the generator cannot run until the damper has been proven (normally by a switch) to be open. It does not mean that the damper will open when the generator is called to run. The damper must open before the generator starts.

TSSA is prepared to consider variances from this requirement provided the damper is spring loaded, so it will open even if the damper motor fails or loses power, and that the damper is connected to an alarm that will alert the generator operators if the damper fails to fully open in 15 seconds.

3. Unapproved Generator Exhaust Systems

Generator exhaust systems must meet the same requirements for venting combustion products as other types of appliances. The exhaust system is required to be a certified vent system specifically certified for generator exhaust or a vent system that has been engineered to meet the requirements of the Ontario Building Code, which references NFPA 211. Schedule 40 steel pipe, which has been used in many installations, may not meet the requirements of the Ontario Building Code depending on the installation, and the maximum generator exhaust temperature. Particular attention must be paid to meeting clearances from combustibles as fires have occurred from unapproved installations.

For more information on fuel distributor inspections visit the Fuels Safety section of TSSA's website, http://www.tssa.org/regulated/fuels/default.asp.

PROPANE LICENSING PROCESS - 2012

By Solomon Ko, P.Eng., Senior Engineer, Fuels Safety Engineering

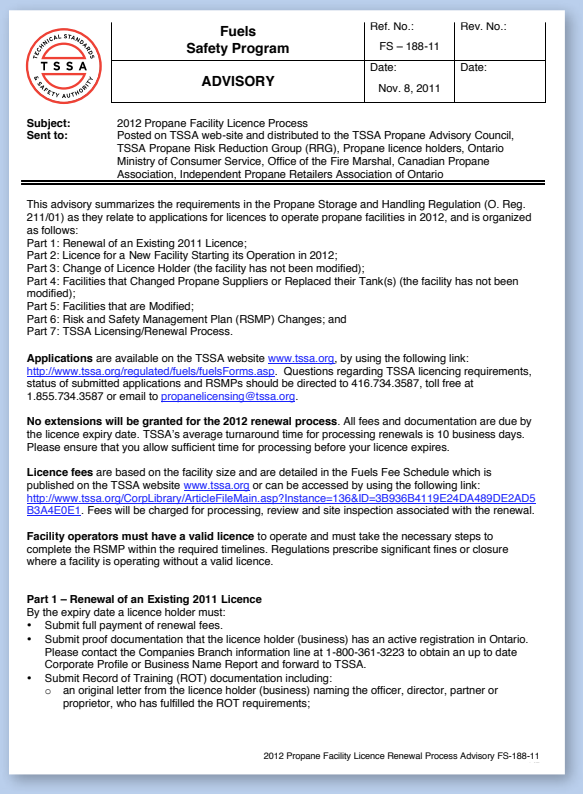
From the time the Government of Ontario introduced amendments to Ontario's Propane and Storage Handling Regulation, industry has been working hard to meet the new requirements including the mandatory submission of a Risk Safety Management Plan (RSMP) as a pre-requisite for licensing of propane filling plants and refill centers.

In an effort to assist the over 1,200 propane sites that needed to have this completed within 2011, licence holders were granted a grace period of 120 days, after the licence expiry date, thus allowing them more time to complete the RSMP and accomplish the required tasks.

With the initial round of renewals in 2011 almost behind us, and with most licence holders having completed the required RSMP, the majority of renewals should become routine from this point forward. Should there be any changes at an existing site or new sites that require modification or completion of a new RSMP, most of the current licence holders are now familiar with the process and requirements, and have the resources to perform the task. Even for new applicants, there are now resources on the market that have experience with the RSMP preparation to assist them in completing the process.

In view of this, it is important to note that effective January 1, 2012, the grace period of 120 days, after licence expiry date, will no longer exist. All licences must be renewed before the expiry date and must comply with all licensing requirements including the RSMP review and in accordance with the applicable scenario such as Level 1 or 2 RSMP, modifications, new application, etc.

Remember, it is illegal to operate a propane filling plant or refill centre without a valid licence. To ensure that the filling plant or refill centre has a valid licence, operators should apply for the licence renewal well before the expiry date, thereby avoiding any potential of having the licence lapse.



	Fuels Safety Program	Ref. No.: FS – 188-11	Rev. No.:
TSSA	ADVISORY	Date: Nov. 8, 2011	Date:

Subject: 2012 Propane Facility Licence Process
Sent to: Posted on TSSA web-site and distributed to the TSSA Propane Advisory Council, TSSA Propane Risk Reduction Group (RRG), Propane licence holders, Ontario Ministry of Consumer Service, Office of the Fire Marshal, Canadian Propane Association, Independent Propane Retailers Association of Ontario

This advisory summarizes the requirements in the Propane Storage and Handling Regulation (O. Reg. 211/01) as they relate to applications for licences to operate propane facilities in 2012, and is organized as follows:
Part 1: Renewal of an Existing 2011 Licence;
Part 2: Licence for a New Facility Starting its Operation in 2012;
Part 3: Change of Licence Holder (the facility has not been modified);
Part 4: Facilities that Changed Propane Suppliers or Replaced their Tank(s) (the facility has not been modified);
Part 5: Facilities that are Modified;
Part 6: Risk and Safety Management Plan (RSMP) Changes; and
Part 7: TSSA Licensing/Renewal Process.

Applications are available on the TSSA website www.tssa.org, by using the following link: http://www.tssa.org/regulated/fuels/fuelsForms.asp. Questions regarding TSSA licencing requirements, status of submitted applications and RSMPs should be directed to 416.734.3587, toll free at 1.855.734.3587 or email to propanelicensing@tssa.org.

No extensions will be granted for the 2012 renewal process. All fees and documentation are due by the licence expiry date. TSSA's average turnaround time for processing renewals is 10 business days. Please ensure that you allow sufficient time for processing before your licence expires.

Licence fees are based on the facility size and are detailed in the Fuels Fee Schedule which is published on the TSSA website www.tssa.org or can be accessed by using the following link: http://www.tssa.org/CorpLibrary/ArticleFileMain.asp?Instance=136&ID=3B936B4119E24DA489DE2AD5B3A4E0E1. Fees will be charged for processing, review and site inspection associated with the renewal.

Facility operators must have a valid licence to operate and must take the necessary steps to complete the RSMP within the required timelines. Regulations prescribe significant fines or closure where a facility is operating without a valid licence.

Part 1 – Renewal of an Existing 2011 Licence
By the expiry date a licence holder must:
- Submit full payment of renewal fees.
- Submit proof documentation that the licence holder (business) has an active registration in Ontario. Please contact the Companies Branch information line at 1-800-361-3223 to obtain an up to date Corporate Profile or Business Name Report and forward to TSSA.
- Submit Record of Training (ROT) documentation including:
  - an original letter from the licence holder (business) naming the officer, director, partner or proprietor, who has fulfilled the ROT requirements;

2012 Propane Facility Licence Renewal Process Advisory FS-188-11

For details on the 2012 licensing process, please refer to Advisory FS-188-11 (dated Nov. 8, 2011) on TSSA's website, www.tssa.org. For enquiries, please contact our Licensing Department at propane licensing@tssa.org or call (416) 734-3587/toll-free 1-855-734-3587.

ENVIRONMENTAL SERVICES UPDATE

By Stephen Hoyle, P.Geo., Senior Environmental Specialist, Fuels Safety Program

Environmental Services Team

TSSA is pleased to announce and welcome two new members to its Environmental Services team – Sridhar (Sri) Sangaraju and Tara Smith. With industry relevant experience and expertise, Sri and Tara will further assist TSSA in delivering important programs that address specific fuels storage and issue needs including:

- management of environmental initiatives for fuel handling sites in Ontario;
- variance applications for abandonment of underground storage tanks in place; and
- variance applications for re-use of single wall underground storage tanks.

TSSA and Source Water Protection in Ontario

TSSA has been actively involved and supportive of the Ministry of the Environment's (MOE) Source Water Protection (SWP) program/plans to date.

The SWP program was initiated in 2000 to protect drinking water resources in local Ontario communities. Specifically, Ontario's Clean Water Act requires that local communities – through local Source Protection Committees – develop SWP plans in order to protect their local sources of drinking water.

Currently, there are nineteen SWP committees across the province working on plans. Protecting our water resources is everyone's responsibility – as such, broad consultation throughout the development of the source protection plans is important and involves municipalities, conservation authorities, property owners, farmers, industry, businesses, community groups, public health officials and First Nations.

The plans are intended to identify existing or potential threats and risks to local drinking water sources and develop strategies to reduce or eliminate these risks. As fuel storage/use has been identified as one of the threats that may pose significant risk to ground water resources, TSSA remains committed to working cooperatively with the province's Source Protection Committees to ensure they are fully informed about TSSA's roles and responsibilities with regard to fuels.

APPLYING FOR A VARIANCE? HERE'S WHAT YOU NEED TO KNOW…

By Richard Huggins, P.Eng., Engineer, Fuels Safety Program

Thinking of applying for a variance? If so, here are some important things you need to know and keep in mind.

Recently, TSSA revised its application forms to specify/individualize the owner, invoicee and technical contact. Applicants should ensure that all parties are properly identified as this assists in streamlining communications between TSSA and the appropriate party.

Special attention also needs to be given to two of the simplest yet extremely important parts of the application form: identifying the actual code that is not being met; and a description of the situation. Specifically, the "code/section" areas must be completed in order to process the application. And, the "description" section must clearly outline why you cannot meet the code requirements, and how you will provide equivalent safety. Whether it is cost, lack of available certified parts, odd process requirements etc., you must clearly explain on the application form itself or through a supporting letter/documentation why the code requirements cannot be met. Ultimately, you must ensure that your submission has enough information to explain to the variance committee what code section you are not meeting, why you are not meeting it, and why the installation is still safe.

A variance from regulations and adopted safety codes and standards may be granted where other methods are used to ensure fuel safety. These variances allow flexibility for the designer to use designs that do not strictly comply with current regulations but are determined to not reduce the level of safety. So do keep in mind that, amongst other factors, a decision to grant a variance is contingent upon safety not being compromised, therefore it is critical that this information be provided and clearly stipulated.

Upon receipt of a completed application, TSSA's variance committee, comprised of engineers and inspectors, will review the request and provide its recommendation to the Director of the Fuels Safety Program, who makes the ultimate decision for granting variances.

Should a variance be granted, a formal letter, signed by the Director, will be issued. This letter will detail the address of the installation, the equipment involved, and the exact code section(s) involved. It will also list any extra safety devices and/or procedures that are required as a condition of the variance such as a TSSA field inspection, and a requirement to post a letter at or near the appliance itself. Please ensure you read your variance letter carefully for precise details and specific information regarding these requirements.

FIELD APPROVALS UPDATE

By Fedja Drndarevic, P. Eng., Senior Engineer, Fuels Safety Program

As a part of its regulatory role, TSSA conducts field approvals of appliances, equipment and installations. This program was developed to accommodate the need for approval of appliances that are custom-made, built on site or in limited numbers not conducive to certification by designated certification agencies. This program is not intended to circumvent the usual certification of appliances, equipment and components by Standards Council of Canada accredited testing organizations.

Outlined below are some of the latest developments in this area.

Revised Application Forms

Recently, the Application for Field Approval of Appliances or Equipment, and Application for a Variance/Deviation were revised to specify: the owner of the appliance or equipment; the invoice; the location address; and the technical contact for a particular application. With the introduction of the revised forms, TSSA will also treat the owner of the appliance, equipment or installation as the person/organization who undertakes the legal obligations and who becomes the owner of the file and its content.

For more information on the Field Approval process and/or to download the forms, please visit the Fuels section of our website at www.tssa.org.

It is important to note that the owner of the appliance, equipment or installation as identified on the application form undertakes the legal obligations and is ultimately responsible for the file and its contents. In other words, although supporting materials such as drawings, calculations, schematics etc. are submitted by a contractor or a consultant, TSSA now regards the owner of the appliance or equipment as the owner of all relevant documentation.

New Field Approval Code – Coming in 2012

A new edition of the Field Approval Code will be released later this year. As the exact timing of a release is yet to be determined, here is a preview of some important changes that are under consideration for the upcoming new edition of the code:

- adoption of the latest editions of the CSA B149.3 Code for the Field Approval of Fuel-Related Components on Appliances and Equipment with amendments, the NFPA 85 Boiler and Combustion Systems Hazards Code with amendments and the NFPA 86 Standard for Ovens and Furnaces with amendments;
- change in requirements on the type and number of safety shut-off gas valves used for a particular firing rate range – for both single and multiple burners appliances;
- introduction of requirements for linkage less fuel/air ratio controllers;
- replacement of term “relief valves” with “overpressure protection devices” to allow use of monitoring regulators and overpressure cut-off devices; and
- updating the method for determining solvent safety ventilation rate for class A continuous process ovens as per the NFPA 86.

Once released, the new edition of the Field Approval Code will be available online at www.tssa.org.

WHAT'S NEW IN ENGINEERING

By Zenon Fraczkowski, P. Eng., Engineering Manager, Fuels Safety Program

In an effort to improve efficiencies and provide enhanced engineering services, we recently reorganized our team into key functional areas, each of which is spearheaded by one individual and supported by a complement of engineers and technicians. This new structure will allow for more focused project management, handling and control and, ultimately, enhanced customer relationship management.

- Field Approvals: Fedja Drndarevic , P.Eng.
- Liquid Fuels: Ann-Marie Barker, P. Eng. ;
- Pipelines: Oscar Alonso, P. Eng.;
- Propane: Solomn Ko, P. Eng.;
- Fuel Oil: Raphael Sumabat, P. Eng.;
- Environmental Compliance: Stephen Hoyle, P. Geo.;
- Variances: Richard Huggins, P. Eng. and
- Digester and Bio Gas: Marvin Evans.

From a regulatory perspective, we are planning to roll out code adoption documents in the upcoming months that will address new code requirements and/or changes, including the latest from Canadian Standards Association (CSA) and National Fire Protection Association (NFPA). In doing so we anticipate seeing a reduction and/or elimination of some of the regional and trans-border differences and eliminate the need for at least some of the variances and directors orders we now have in place.

The adoption of CSA B149.1-2010 under Gaseous Fuels Code Adoption Document (CAD), the CSA B149.2-2010 under Propane Storage and Handling CAD, CSA B149.3-2010 under the Field Approvals CAD, CSA Z662-2011 for Pipelines and CSA B149.6-11 for Digester and Bio Gas Installations, is anticipated for late summer or fall of 2012. So stay tuned for more information – alternately, if you are not already subscribed to our website, www.tssa.org, you may want to consider doing so to receive automatic updates on this and other important fuels safety information.

In an effort to improve our services and regulatory practices, we are continuing to make the most of our resources by integrating proven risk-management principles into our operations and applying a risk-informed approach to the evolution of our safety regulations and codes. Our goal is to move away from the reactive mode where an incident today will be used to support a code change two years later. We want to be in a more predictive position instead of waiting for an appliance to fail, we use risk, statistical and loss analysis to predict failures and avoid them by developing appropriate maintenance, inspection or replacement schedules. We are running two pilot programs involving fuel oil storage and transmission to develop and test this approach further. Once these are completed we hope to use a similar approach in other areas we are involved in.

NEW APPRENTICESHIP PROGRAM – GAS TECHNICIAN

A new apprenticeship program for Gas Technicians (636G) is now in place with the Ministry of Training, Colleges and University (MTCU).

As a prerequisite for registration, a potential Gas Technician apprentice must have successfully completed a TSSA Fuels Safety Workshop and be issued a Gas Technician in Training (G2-T) certificate or already hold a Gas Technician 3 (G3) certificate.

Upon successful completion of the apprenticeship training a Certificate of Apprenticeship (C of A) will be issued by MTCU. The C of A holder may then apply to TSSA for examination and certification as a Gas Technician 2.

As a holder of a G2 certificate you may install, inspect, alter, purge, activate, repair, service or remove gas-fired equipment that has an input of 400,000 BTUH or less and the equipment and accessories essential to its operation.

To learn more about the apprenticeship program or to arrange a meeting with an Employment and Training Consultant, contact a MTCU apprenticeship office. For a location nearest you, visit MTCU's website at http://www.findhelp.ca/mtcu/appoff.html.

MESSAGE FROM THE DIRECTOR

(continued from the front cover)

As pipeline strikes are the most prevalent incidents, accounting for approximately half of the reported incidents, we at TSSA are continuing aggressive enforcement of pipeline damage activities. This includes ensuring we have sufficient and well trained resources. As such, TSSA's Fuels Safety Program has dedicated two damage prevention inspectors in the Greater Toronto Area – the location where most of the damages occur – in an effort to further promote public safety and improve compliance. Furthermore, we also continue to conduct safety presentations and 'dig safe days' to audit excavation sites across the province. Through these 'dig safe days' our inspection team blitzes excavation sites to gauge the level of compliance and provide safety awareness information, where necessary.

Whether through independent or joint efforts, each of our actions contributes greatly to pipeline safety. With that said, let us all continue to put our best foot forward and avoid the consequences of an incident by continuing to excavate and ultimately dig-up the best possible strategies and solutions for safe digging practices.

As always, I welcome your feedback on how effectively we meet our commitments and responsibilities. TSSA appreciates the ongoing work by the fuels industry including the input from the various fuels Advisory Councils. We look forward to ongoing cooperation from all parties as we work together to promote safe operation and maintenance of fuel burning equipment and surroundings – after all, safety is our business!

For valuable fuels safety information, including tips, downloads and related links, visit our new and improved website, **www.safetyinfo.ca**

TSSA Update

FUELS UPDATE EDITION

We welcome your comments and story ideas for future editions of this newsletter. Please contact:

TSSA UPDATE (Fuels Edition)

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