

Reviewer/Comments From: Mike Sheppard, P. Eng.; Darren Randel, P. Eng. – Aker Solutions Canada

Comment #	Part / Title	Section Title	Section/ subsection (no spaces)	Regulation Provision Text (published in <i>Canada Gazette</i> , Part I)	Comment / Problem Created	Proposed solution/changes
EXAMPLE	1 Management System	Requirements	5(1)(d)	it must foster a culture of safety;	No change needed; agree with this, very important!	N/A
1.	PART 8 Installations, Wells, Pipelines and Vessels	Installations - Gas Release System	127(1) 127(7)	127 (1) An operator must ensure that an installation that includes process tanks, process vessels and piping has a gas release system that has a flaring system , a pressure relief system, a depressurizing system or a cold vent system. Flaring system (7) The operator must ensure that the flaring system and any associated equipment are designed to...	There is no explicit language for closed flare system design safety and performance requirements, reliability expectations, etc. – only open continuous flaring seems implied. Industry is trending towards closed flare systems for resource conservation and environmental protection so this seems to be a gap / missed opportunity that will open operators to having to pursue regulatory clarification for equivalency with jurisdictional authorities.	Consider clear provision for design, operation, safety, and reliability goals for closed flaring systems that only operate during planned or emergency depressurization scenarios but remain closed otherwise.
2.	PART 8 Installations, Wells, Pipelines and Vessels	Installations	NA	N/A – No current causes provided	Legacy regulations contained quantified requirements for maximum radiant heating thresholds for personnel exposure and heating of structural and equipment surfaces – for long term (continuous), short term (planned/emergency flaring), and personnel egress/escape scenarios. Understanding that the proposed regulations are to be broadly goal based, it is not clear what the recommended radiant heating standard(s) are to be considered, Is this now a project-specific, risk-based approach that is proposed and agreed in the CSA, endorsed by the CA and Regulator, or is there still an expectation that certain standard(s) be applied?	Clarification of intent as noted in comments.
3.						

Reviewer/Comments From: Mike Sheppard, P. Eng.; Darren Randel, P. Eng. – Aker Solutions Canada

4.						
5.						