

BOILER SAFETY INTERPRETATION/TECHNICAL LETTER BSI19

## **MEMORANDUM**

- TO: All Authorized Inspection Agencies & Supervisors
- **FROM:** Fred P. Barton, Director/Chief Inspector Boiler Safety Compliance Program
- **SUBJECT:** Issues for 2003
- **DATE:** February 4, 2003

The year 2003 promises to be another year of challenges for the Department of Labor and Industry. Electronic reporting is an accomplished fact for a small group of inspection companies. The dedicated Boiler staff has been entering all data from other companies into our data bank via the Internet. This past year there has been a huge learning experience related to the Internet for most Inspectors and the Boiler staff.

Following is a summary of issues that you should be aware of. Please convey this information to all Inspectors performing certificate inspections in Virginia:

A. Overdue Inspections

Due to limited resources, (Boiler Safety's annual budget was reduced 22%) Commonwealth Boiler Inspectors are now focusing mostly on unregistered boilers and pressure vessels. We may no longer visit owners with lapsed Certificates and give them 30-day notices. Instead, we will rely on the "delinquent letter" to remind owners of their obligations and start the 30-day compliance window that way. The number of overdue inspections appears to have risen significantly over the past year. We do expect that inspection companies will take strong action on the overdue lists that will be mailed out shortly.

B. Inspection Reports

Last spring, all Inspectors were given instructions and examples of information required to be entered on First Inspection Reports (BPV-5s). I have had an opportunity to review many inspection reports (past and present) and have been disappointed at the disparities amongst information in our files and the data reported. Inspectors should double check the information they are gathering and what is reported. I'm reminded of the old saying about entering computer data

"garbage in – garbage out". Please remember that all the information in our database is gleaned from inspection reports. Thus, each Inspector's thorough and accurate submittal is vital for the continued success of data we supply each company once a year.

Please also be reminded that our Boiler Rules stipulate that an external inspection occurs when the item is in operation. I expect all Inspectors will witness the testing of safety valves in all cases and will witness the testing of low water cut-offs whenever possible. In order for the Boiler staff to complete data for our revised database it will be mandatory effective May 1, 2003 that all inspectors verify what is tested under "conditions" of both First Inspection Reports (BPV-5s) and renewal (BPV-6s) Inspection Reports.

Each report shall include information under "conditions" as follows:

- a. Safety/Relief Valve tested (Yes or No)
- b. Low water cut-off tested, as applicable (Yes, No or NA)
- c. Item not in use.
- d. Safety/Relief Valve relieving capacity

Reports without this information will be returned.

C. Fuel Trains

The Safety and Health Codes Board has approved the adoption of certain parts of CSD-1-1998, effective March 1, 2003. After March 1, CSD-1-1998 is mandatory and no longer a "guide" for all boilers constructed and installed after that date. It is not retroactive to existing boilers except for moving second hand or used boilers.

Boiler Inspectors will be expected to enforce Parts CG, CW and only CF330 and CF530 of Part CF on new high and low pressure boilers after March 1, 2003. Manual resets will be required on the second low water cut-off of all steam boilers. Virginia Building officials will continue to enforce the other paragraphs of combustion side control (CF) such as vents.

- D. There will be a meeting this spring of all supervisors/managers of inspection companies performing certificate inspections in Virginia. The purpose of the meeting will be to discuss:
  - a. Overdue inspections
  - b. Inspection Reports
  - c. Electronic Reporting

Every effort will be made to schedule the meeting in conjunction with the spring Virginia Boiler and Pressure Vessel Inspectors Association meeting in April to minimize in travel costs. Please let me know if there are any subjects that you wish to be discussed. The Commissioner or Deputy Commissioner will attend this very important meeting. Again, please pass along the above information to all of your Inspectors with Virginia identification cards.

Finally, I want to acknowledge and thank all Inspectors, Supervisors, and staffs for their hard work during this difficult past year. Despite the challenges, I have been continually impressed with the continued cooperation and helpfulness of all involved in the universal effort to ensure public safety.

FPB/fs