



Summary Feedback

Boilers and Pressure Vessels (BPV) Code Adoption Document (CAD) 2018 Consultations

Section	Comment Submitted	Action
5.3(ii).	Is it possible to have a 90-day payment schedule for the COI fee included in the CAD?	This is an operational issue that cannot be addressed via a CAD amendment. A note is included advising owners and insurers to schedule inspection at least 90 days ahead of the COI expiry date, to enable them to meet the 30-day regulatory requirements for submitting the ROI to TSSA
4.1	What about shop inspection elsewhere e.g. U.S.A? Proposal to include the words “in Ontario” so the section can read as follows: “The inspection of a boiler, pressure vessel (shop inspection) or piping (piping inspection) shall be conducted by a TSSA inspector at any stage of its manufacture or installation in Ontario , as per the Code Adoption Document sections 1, 2 and 3.	Shop inspection requirements inside and outside of Canada are specified in section 1.13 It is implicit that TSSA’s jurisdictional authority is in Ontario and TSSA’s legal has advised against this inclusion citing this as a redundant addition that may cause confusion in interpretation
5.4.1	Suggested deletions to have the section read as follows: Upon conducting the periodic inspection as required in 5.2, above, the insurer shall issue to the owner or operator an inspection report which shall include the information listed in 5.4.2, below. The inspection report shall state whether the inspection passed or failed. For those inspections that failed, the inspection report shall contain all instructions for the owner or operator for repairs or corrective actions required. The National Board violation category/categories shall also be identified.	Feedback considered and incorporated. Statement deleted since the regulation does not prescribe a format for the inspection report, other than require that it be issued by the insurer to the owner after a periodic inspection
5.4.2(xii).	Inspection – Clarity regarding whether a COI can be issued based on a conditional pass.	There is no provision for a conditional COI in the regulation. TSSA recognizes this unique issue and is developing guidelines for issuing conditional passes and follow-up procedures. TSSA will communicate to insurers and owners/operators when these guidelines are ready
5.5.1	Notification of change to insurer? Suggestion to add a note to clarify the role of “Lead” insurer.	Feedback considered but not incorporated. The regulatory responsibility of notification of change falls on the insurer who is licensed to conduct boiler and machinery inspection. Adding a “lead insurer” terminology in the CAD is contrary to the regulation and may cause confusion.
9.2	Attestation – Asking insurers to provide information detailed in 9.2 is considered repetitive given that they are already submitting information through the ROI. Remove and leave as a certification statement that all information submitted throughout the year is “true”.	Feedback considered and incorporated. Section revised to a simple attestation statement.



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9.2	Do the insurer audits apply to reinsurers? Add note to clarify.	Audits apply to all reinsurers licensed to inspect pressure vessels
1.3	<p><i>The for Authorized Inspection Agency (AIA) is not only for the new constructions, but also for the in-service inspections. TSSA is not the only AIA authorized to perform inspections in Ontario. The B51-14 definition for Authorized Inspection Agency (AIA) should therefore stand, or the CAD version be modified to read as follows:</i></p> <p>Authorized inspection agency — the inspection agency authorized by the <u>Technical Standards and Safety Authority</u> to perform inspections required under the Act and in the province of Ontario is the Technical Standards and Safety Authority.</p>	Feedback considered but will not be incorporated since it is out of scope for the current CAD amendment. The CAD amendments are non-code, and this will be considered for the next CAD amendment when updates are made to the CSA B51 code.
5.4.2	Suggestion to delete all the items listed as information required for the ROI and list them in a separate document referenced in the CAD	Feedback considered but not incorporated since this is a requirement under section 10(6) of O. Reg. 220/01. – “The Record of Inspection will be prepared in a form and manner set out in the code adoption document”.
5.5.1(a)	A possible typographic error where “Boiler Removal Form” is referenced as opposed to “Boiler and Pressure Vessel Removal Form”.	Current naming convention of “Boiler Removal Form” will be retained until next CAD amendment.

Prepared by TSSA’s Stakeholder Relations Team

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