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Circular Letter PV-2013-1

Effective Date: September 25, 2013

Subject: Oil Field Recovery Heater Safety Valves

To: All Inspection Agencies and Boiler Owners

There has been some confusion concerning how to maintain the safety valves installed on oil field recovery heaters. This circular letter will attempt to provide clarity on how to comply with the requirements of the California Code of Regulation Title 8 (CCR T8).

Oil field recovery heaters are boilers defined in CCR T8 Subchapter 2 Section 753 as "A forced-circulation, once-through, water tube steam generator, used only in oil field thermal recovery operations, having no fired pressure parts larger than 4-inch pipe size and no other pressure part larger than 6-inch pipe size." CCR T8 Subchapter 2 Section 761 requires these boilers to have a safety valve constructed, stamped and installed in accordance with the ASME Code.

CCR T8 Subchapter 14 Section 6552(i) requires that "Each pressure relief device in service shall have a serial or identification number stamped upon it and, in addition, a metal plate or tag shall be attached showing the pressure setting and the date the device was installed in service. A permanent and progressive record showing the serial or identification number, the location, the pressure setting, the date of installation in service, and the date of testing shall be maintained at the plant or field office where the pressure relieving device is located or at the supervising office."

What this means to owners and inspectors of oil field recovery heaters is that each boiler shall have safety valves installed with a "V" stamped nameplate in accordance with ASME Section I. If the ASME nameplate is lost or illegible, a duplicate nameplate may be installed in accordance with an appropriate national standard (e.g. the National Board Inspection Code) or the manufacturer's instructions. A safety valve that cannot be identified in a manner to allow a duplicate nameplate to be installed shall not be put in service.

The safety valves shall be tested by a company capable of verifying that the valve opens at the set pressure. This testing shall be documented and maintained in accordance with Section 6552(i).

Please contact our office if you have any questions.

Sincerely,

Donald C. Cook
Principal Safety Engineer