

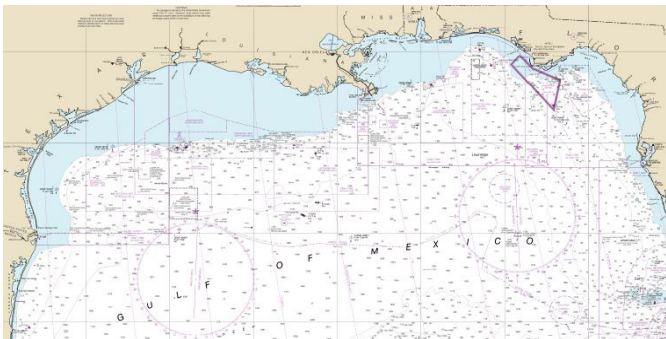
There have been several key changes to 30CFR250 Subpart H regulations that affect offshore facilities design. Our Professional Engineers' familiarity with these changes can make EDG a key ally on your projects.

BSEE rolled out another update to Subpart H on December 27, 2018. This revision took aim at cleaning up difficulties in implementation of the November 6, 2016 update and incorporated by reference newer editions of numerous design standards. EDG personnel engaged with industry and regulators in the rulemaking review and commenting process and is ready to help navigate the new requirements.

General Overview

The revised Subpart H became law on December 27, 2018. In general, the revised Subpart includes the following updates:

- Overhauls the Process Safety System Application (PSSA) requirements in §250.842, including the submittal documents and documentation maintenance;
- Incorporates by reference later editions of API RP 500, API 510/570, and API Spec 6A, among others;
- Removes requirement for SPPE third-party review/certification; adds subsea GLSDVs to SPPE list; and
- Removes requirement for PE stamping of as-built Process Safety System Application drawings.



Items Unchanged from November 2016 Rule

Despite industry comments from organizations such as the OOC (in which EDG actively participates), API, and NOIA, BSEE has maintained several regulations including:



- Listed PSSA documents are required even if they do not currently exist (e.g. for older assets); EDG can help with creation or maintenance of these drawings as needed
- Class I chemical injection systems must be depicted on PSSA documents regardless of chemical volumes
- PSV testing requires confirmation of full main valve un-seating
- Flame Arrestors require visual inspection
- BAST is ill defined

Process System Application Updates

The 2016 revision of §250.842 (PSSA requirements) lacked transparency and imposed difficult-to-implement PE stamping requirements. After two (2) years of industry feedback, BSEE overhauled the section and published a clearer Rule that:

- In keeping with typical industry interpretation, simplifies the two (2) previously required process drawing sets (P&IDs and SAFDs) to a single set of SAFDs including all required information;
- Requires more detailed P&IDs with PSSA submittals for new facilities only;
- Adds a list of design documents that must be “developed and maintained”, including cable tray/conduit routing plans and P&IDs (for existing facilities); and
- Removes requirement to PE stamp as-built design documents; as-builts still required without stamping requirements (certified correct by Company).



EDG Can Help



EDG’s understanding of the latest regulations leads to accurate cost estimates and efficient processes that ultimately result in timely project design compliance and approval. In addition to other first-class capabilities, we have resources available to support you with the following services:

- Hazard Analysis Revalidation per Company Requirements or EDG-developed Lean Revalidation Methodology;
- Facility walk-downs and drawing as-built updates;
- Development of newly required compliance drawings; and
- Interpretation and guidance by engineers well-versed in the latest rulemaking and incorporated standards.

Contact

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