



OFFSHORE OPERATORS COMMITTEE

February 20, 2002

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, VA 20170

Attention: Rules Processing Team (RPT)

30 CFR 250
66 FR 66848; December 27, 2001
Document Incorporated by Reference
American Petroleum Institute
API 510

Gentlemen:

The Offshore Operations Committee (OOC) appreciates the opportunity to provide written comments on the proposed rulemaking to incorporate by reference the Eighth Edition of the American Petroleum Institute's API 510 "Pressure Vessel Inspection Code: Maintenance Inspection, Rating, Repair and Alteration" into Minerals Management Service (MMS) regulations.

The OOC is a trade organization of 110 members and associates that represents virtually all of the oil and gas production in the Gulf of Mexico (GOM). OOC comments are made without prejudice to any member's right to have or express different or opposing views.

The OOC commends the MMS for incorporating industry standards into its offshore operating regulations to improve safety on the OCS. API 510 covers maintenance inspection, repair, alteration, and re-rating procedures for pressure vessels used by the petroleum and chemical process industries. All sections of API 510, **except for Section 6**, are applicable to pressure vessels in Exploration and Production (E&P) service. Accordingly, the OOC recommends that the MMS incorporate API RP 510, excluding **Section 6**, into the regulations.

Additionally, Section 8 of API 510, which sets for inspection rules for E&P pressure vessels, includes a requirement that conflicts with existing MMS regulations. Therefore, OOC recommends that **paragraph 8.5** also be excluded from incorporation into the MMS regulations. This paragraph addresses safety-relief device testing, including inspection testing, repairs, and associated documentation. The procedures outlined therein are not consistent with the applicable requirements in 30 CFR 250.804(a)(2) and 250.806(a). Paragraph 8.5 (by reference to paragraph 6.6) details standards for quality control documentation and the establishment of test intervals determined by the performance of the devices and recommends that the intervals not exceed 5 years unless experience indicates that a longer interval is acceptable. However, 30 CFR 250.804(a)(2) requires that pressure relief valves be tested at least once every 12 months. Also, 30 CFR 250.806(a) outlines MMS quality assurance requirements for safety and pollution prevention equipment and does not include requirements for pressure relief valves.

Therefore, OOC recommends that the text in the proposed rule referenced as 30 CFR 250.803(b)(1) should be changed to only incorporate **Sections 1, 2, 3, 4, 5, 7 and 8(omitting paragraph 8.5)**. Also, 30 CFR 250.803(b)(1)(i) should be limited to the design and installation of pressure relief valves in accordance with the applicable provisions of the ASME Boiler and Pressure Vessel Code, omitting any reference to API RP 510. In addition, the MMS should consider similar changes to the applicable sections of **Subpart P**.

As stated in the preamble to the rulemaking, MMS is proposing to incorporate API 510 to clarify requirements on pressure vessel operations, inspections, repairs and maintenance of pressure vessels in service on the OCS, since the ASME Code presently included in the MMS regulations does not address maintenance inspections, repair, and alterations of pressure vessels after the vessels are placed into service. The OOC comments are intended to keep the rulemaking focused on E&P pressure vessels, and provide consistency with existing MMS regulations.

If you have any questions or need additional information regarding these comments, contact the undersigned at 504-561-2427 or Steve Brooks at 504-561-4753.

Yours truly,

Allen J. Verret
Executive Director

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