

Alaska Oil and Gas Association



121 W. Fireweed Lane, Suite 207
Anchorage, Alaska 99503-2035
Phone: (907) 272-1481 Fax: (907) 279-8114
Patrick Bergt, Regulatory and Legal Affairs Manager

January 13, 2020

VIA EMAIL: becky.weimer@alaska.gov

Ms. Becky Weimer
Department of Labor and Workforce Development
Labor Standards and Safety
P.O. Bo 111149
Juneau, AK 99811-1149

December 4, 2019, Notice of Proposed
Changes to Regulations in Title 8 of the
Alaska Administrative Code

Dear Ms. Weimer:

The Alaska Oil and Gas Association (“AOGA”) is a professional trade association whose mission is to foster the long-term viability of the oil and gas industry for the benefit of all Alaskans. AOGA’s membership includes 14 companies representing the industry in Alaska that have state and federal interests, both onshore and offshore.

This letter is provided in response to the Alaska Department of Labor and Workforce Development’s (“DOL”) December 4, 2019 Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development (“Notice”). These comments address only DOL’s proposed amendments to 8 AAC 80.110(c).

AOGA appreciates DOL’s recognition of the need for consistent and universal standards for relief valve performance testing. To that end, AOGA supports DOL’s proposed changes to 8 AAC 80.110(c), which seek to amend existing code and allow operators (with verified and certified testing and inspection programs) pressure valve testing intervals consistent with the national standard.

Under existing regulation, refineries are unnecessarily confined by a 5-year performance testing mandate. Adopting the standard testing intervals as provided for in Pressure Vessel Inspection Code: In-service Inspection, Rating, Repair, and Alteration (API 510), removes the 5-year mandate while enhancing health and safety by requiring adherence to a robust program consistent with national standards.

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Thank you again for seeking input on the proposed amendment. We appreciate DOL's consideration of the comments provided herein.

Sincerely,

A handwritten signature in blue ink, appearing to read 'P. N. Bergt', with a stylized flourish at the end.

PATRICK N. BERGT
Regulatory and Legal Affairs Manager