

Lepore, Theresa (DPS)

From: McCarthy, Jean (DPS) on behalf of DPSinfo (DPS)
Sent: Monday, August 31, 2015 11:33 AM
To: Lepore, Theresa (DPS)
Subject: FW: EO562

Jean McCarthy
Executive Assistant
Department of Public Safety
1 Ashburton Place, Room 1301
Boston, MA 02108
617-826-5210

-----Original Message-----

From: _____
Sent: Monday, August 31, 2015 8:32 AM
To: DPSinfo (DPS)
Subject: EO562

To Whom It May Concern,

I'm responding to Executive Order 562:

My name is Frank Zarrella and I have over thirty years combined experience regarding the safe and reliable operation of power generating plants and inspection of pressure vessels. Also, I once served with the Department of Public Safety as a "commissioned" District Engineering Inspector under past Commissioner Joseph Lally. I currently work as a Boiler Inspector for an insurance company.

The following comment regards existing Massachusetts law / regulations to which should be considered for regulation promulgation or changes to statute and to which I speak of from thorough knowledge of such code / regulations.

1)Promulgating the existing DPS draft of CMR 522: Agency - "Board of Boiler Rules":

For over four years the rewrite of this regulation has been delayed and needs to be definitively promulgated so as to allow both the owner / user of pressure vessels as well as inspectional agencies to have definitive guidelines to safely operate and inspect said devices.

2)Statutory change to MGL 146: Inspection of Boilers / Pressure Vessels:
Section 45A: Necessity of Inspection

This section should exempt any air conditioning unit with over 20 tons cooling capacity which is in an "unoccupied" space as defined in existing code.

Examples of an "unoccupied space" are roof-tops or parking-lots as such installation locations are not covered and are exempt in ASHRAE Standard-15 "American Society of Heating, Refrigeration, and Air Conditioning Code of installation.

"ASHRAE Standard-15" has already been accepted, in its entirety, by the Mass. Board of Boiler Rules many years ago.

An outdoor unit would pose no immediate threat to public safety and should be exempt from annual inspection.

3) Statutory Change to MGL 146: Inspection of Boilers / Pressure Vessels, License of Fireman / Engineers - Section: Definitions

Language added to include defining Gas Turbo-Generators also known as "CTG's" combustion turbo-generators which are the predominant prime-mover in electrical power generating industry today, but were not in use when the statute was written decades ago.

Already in statute is the requirement regarding having duly licensed operators be available to monitor high-pressure steam driven turbines and steam engines.

Currently, no qualification license is required to operate a gas-turbine and as a gas turbine is essentially a "jet-engine" bolted to the ground, allowing the high revolution giants to be operated unmanned can put public safety at risk.

4) Statutory change to MGL 146: Inspection of Boilers / Pressure Vessels, License of Fireman / Engineers - Section 46: Ascertainment of Horsepower

Language added "heat-engines" would suffice to cover this category using "manufacturer's rated shaft horsepower" as the determinant factor for determining horsepower of gas turbo-generators.

Should you have any additional questions regarding my comments or require proof of my knowledge, background, or vocation; please do not hesitate to contact me.

Respectfully Submitted;

Frank Zarrella