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From: rrcwebcontact@gmail.com
Sent: Friday, November 8, 2019 8:01 AM
To: Rules Coordinator
Subject: Comment Form for Proposed Rulemakings

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Comments Form for Proposed Rulemakings

Date Submitted

Friday, November 8, 2019 2:01:11 PM

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Amend Chapter 9--HB 2714 (2019), NFPA updates, and other clarifications

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The Texas Association of Campground Owners is pleased to support proposed Amendment changes and clarifications to Chapter 9 regarding LP Gas Safety Rules. About half of our Association Members sell propane in their campgrounds and our industry interacts with many visitors from out of State where the LP Gas Safety Rules are less stringent and the changes and clarification will make it easier for us to explain to those guests why we take the steps we do to sell them propane. We have comments on the subchapters as listed below.

The clarification in Subchapter §9.1 (d) that changes in the Gas Safety Rules will not be retroactive unless noted and any installation of a LP system shall meet the code has our support.

The retention of the four year continuing education as noted in Subchapter §9.2 (14); Subchapter §9.52 (4) (b) and in the noted exceptions that the Commission did not adopt NFPA 58 §4 in its entirety will greatly reduce the cost of our members who would have to send employees on a more frequent and generally overnight stay to attend continuing education classes. We support the retention of four years for continuing education.

In relation to Subchapter §9.51 (c) (2) (b) (f) we were pleased to find the Commission was willing to develop a combined test in DOT cylinder filling and Motor/Mobile fuel for employee applicants that need both certificates as in our parks guests may have either cylinders or ASME tanks on their vehicles.

The changes in Subchapter §9.140 on System Protection Requirements will reduce the confusion from the previous wording on protection requirements. We had hoped to see vertical protection (bollards) alone as specified in §9.140 (d) (1) as an acceptable protection requirement alone and not require the horizontal guard railing as specified in §9.140 (d) (2) as a requirement on all installations. Many dispensers in our parks are located away from major highways and streets and the chance of high-speed collisions are slight, and the horizontal protection will add very little to the strength of the vertical protection (bollards). We feel that the horizontal requirement should be added on a case by case basis.

The Association was happy to be part of the discussion and given the chance to input changes that we felt would benefit our industry when the Commission started to review updates to the Chapter. Since that time we have invited the Commission to participate in our Trade Show and hold classes for our members in procedures and practices and those classes have been well attended and beneficial and we look forward to continuing classes at our meetings. Once the changes in the chapter are finalized we will note the changes in our newsletter to communicate the changes to our members.