

Kellie Martinec

From: Larry Baty <larry@servisgas.com>
Sent: Friday, November 15, 2019 9:53 AM
To: Rules Coordinator
Cc: jmason@txpropane.com
Subject: Proposed rule changes

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9.10(d) Oppose this rule change, cylinder drivers perform no lp gas activities requiring testing as a bobtail driver.

9.140 Oppose this rule change, testing has already been performed to cages and they do not need protection.

Yes to this addition, 4 inch bollards should be accepted as acceptable crash protection.

9.308 Referring to CSST, we as propane dealers are not qualified to perform these inspections, they should be performed by licensed electricians.

6.29.3.3 Opposed to Fire Safety Analysis, we use forms 500 and 501 as well as Tier 2 reporting to notify everyone of our installations.

9.2 Definition of tank repair should not be removed but definition of maintenance should be added to clarify what we can do to tanks as maintenance not repairs by manufacturers.

9.126, 9.143 Support allowing electronic ESV as an option.

9.143(d) Support allowing engineered breakaway coupling as an option.

9.134 Support replacing wordage of pressure test with leakage test.

9.311 Oppose removing trusses as support for piping in chicken houses.

6.10.2.3 Support removing grandfather clause referring to single stage regulators, they should be outlawed.

8.3.1(a)(b) Support rule as stated, no to exception as proposed.

9.6.22 Support leaving in place DOT rules referring to public transporting tanks and cylinders.

Chapter 15 Opposed We do not need O & P manuals, these should be left to company policies.

Larry Baty
972-771-8654
www.servisgas.com



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