

Kellie Martinec

From: Matt Peterson <bbpropane72@gmail.com>
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To: Rules Coordinator
Subject: propose LP gas safety rules

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My comments concerning the proposed LP gas safety rules are as follows:

1. Oppose Rule 9.10(d) - A container delivery unit driver is not the same as a bobtail driver and should not be subject to the same examination.
2. Oppose Rule 9.140 requiring additional crash protection for 20# cylinder and forklift cylinder storage.
3. Support that the RRC clarify the use of bollards in other installations requiring crash protection.
4. Oppose proposed revisions to Rule 9.308 that would require ensuring the bonding requirements of NFPA 54 7.12.2 were met. Oppose to certifying electrical work has been done properly.
5. Oppose section 6.29.3.3 of the NFPA 58 2017 requiring a fire safety analysis.
6. Oppose Rule 9.2 to the deletion of the definition of repair to container and support to adding the definition of maintenance, so it is not classified as repair.
7. Support Rule 9.126 Appurtenances & Equipment and 9.143 Piping and Valve Protection for Stationary Installations. Support that the Commission allow for an electronic pneumatic actuator.
8. Support Rule 9.143(d) to adding additional choices for engineered safety breakaway coupler.
9. Support Rule 9.134 to remove the pressure test requirement and require a leak check.
10. Oppose Rule 9.311 to eliminating the use of ceiling trusses in chicken houses to hang piping.
11. Support NFPA 58 6.10.2.3 to remove the grandfather exception for single stage regulators over 100,000 BTU's.
12. Support NFPA 58 3.3.1(a)(b) to adopt this section as published but do not support proposed exception not to adopt this section so that any size cylinder can be stored in a building of any kind.
13. Support NFPA 58 9.6.2.2 to adopt this section that will ensure the public has rules to follow while transporting propane.
14. Oppose adoption of Chapter 15 of NFPA 58 requiring and O & M manual for storage over 10,000 lbs. This is a business owners decision not the RRC.

*Matt Peterson
Buster Brown Propane*