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From: Larry Rollins <larry.bbpropane@gmail.com>
Sent: Thursday, November 14, 2019 5:08 PM
To: Rules Coordinator
Subject: MY COMMENTS CONCERNING THE PROPOSED LP GAS SAFETY RULES

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1. OPPOSE rule 9.10(d) A container delivery driver does not have the same job duties or responsibilities as a bobtail driver. He or she does not inspect, repair, or do maintenance before filling nor do they transfer or pump LP gas in any container. All of this activity is done or should be done at office or loading dock before the delivery truck is loaded.
2. OPPOSE rule 9.140 requiring additional crash protection for 20# cylinders and forklift cylinders storage racks. A rack or cage is plenty of protection for DOT cylinders.
3. SUPPORT that the RRC clarify the use of bollards in other installations requiring crash protection.
- 4 OPPOSE the 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. This should be the responsibility of the electrician and the inspector how signs off on the electricians work.
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 hte 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 installation.SUPPORT that the RRC 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. A leak check is more efficient and will show the smallest of leaks from the cutoff valve at the tank to the control valve or gas valve on the appliance. Checking all piping including the appliance connectors and in most cases the appliances themselves.
- 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 10,000lbs. This is a business owners decision not the RRC.

Thank you for listening
Larry Rollins Jr
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