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From: Jeff Nelson <jnelson@nelsonpropane.com>
Sent: Friday, November 15, 2019 1:57 PM
To: Rules Coordinator
Subject: New LP Gas Safety Rules

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Below are the comments I have formulated for each of the proposed rules I oppose.

1.OPPOSED. LP Gas Safety Rule 9.10 (d) Employee-Level Examinations. The Railroad Commission proposed to add **container delivery unit drivers to be required to take the bobtail examination.**

Say "No" to the requirement that container/cylinder delivery drivers be required to have a certification and sit for the bobtail exam. Container delivery does not fall within the scope of the RRC, and job functions do not match a bobtail driver. There is simply no transfer of propane and not necessary to provide the safety education for this process.

2.OPPOSED. LP Gas Safety Rule 9.140. Uniform Protection Standards.

Say "No" to RRC requiring additional crash protection for 20 lb cylinder and forklift cylinder storage. The National Propane Gas Association funded extensive testing to determine adequate levels of protection. As a result of the testing, NFPA 58 adopted updated rules confirming locked ventilated cages serves as adequate protection and no further protection is needed. This simply overreach on rules that are already safe.

3.OPPOSED. The RRC's adoption of the **section 6.29.3.3 of the NFPA 58 2017** requiring a **fire safety analysis.**

Say "No" to the new requirement of having to have a fire safety analysis. Preserve this exception to NFPA 58 we've had since 2001. The requirement is redundant and not needed! This does not provide any additional level of safety.

4.OPPOSED.LP Gas Safety Rule 9.2 Definitions. Say" No" to the deletion of the definition of "repair to container," and **SUPPORT "Yes"** to adding the definition of maintenance, so it is not classified as repair. Follow the DOT definition. Repairing a container and maintaining a container are two different processes.

5.SUPPORT. LP Gas Safety Rule 9.134 Connecting Container to piping.

Say "Yes" TPGA's proposal to remove the pressure test requirement, and require a leak check instead. The amount of pressure delivered to a piping system is not based on a safety requirement. It needs to be a lead test.

6.OPPOSED. LP Gas Safety Rule 9.311 Special Exceptions for Agricultural. Say

"No" eliminating the use of ceiling trusses in chicken houses to hang piping because of the corrosive nature of the environment on the floor of the chicken house.

7.SUPPORT. NFPA 58 9.6.2.2. Transportation of Containers. Say "Yes" to

adopting this section this will ensure the public has rules they must follow while transporting propane.

8.OPPOSED. NFPA 58, Chapter 15. Operations & Maintenance.

SAY "No" to the Railroad Commission is proposing adoption of chapter 15 which would require an Operation & Maintenance (O & M) manual for storage over 10,000 lbs. (2,380 gallons); The RRC has created an exception stating the requirement pertains to 10,000 gallons or greater. TPGA strongly suggests say no, an O & M manual should be a business decision and not the RRC's. Again there is no additional level of safety provided by this manual.

Sincerely,

Jeff Nelson
CEO
Nelson Propane Gas, Inc.