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Sent: Friday, November 15, 2019 2:38 PM
To: Rules Coordinator
Subject: Proposed LP Gas Safety Rules

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1. LP Gas Safety Rule 9.10 (d); I am opposed to the requirement to require a cylinder driver to take the Bobtail driver exams. A container driver is not the same as a bobtail driver. The job requires different exams.
2. LP Gas Safety Rule 9.14; Uniform Protection Standards: I am opposed requiring additional protection for cylinder storage. Testing has confirmed that what is in place is adequate protection.
3. Suport: Yes to TPGA requesting clarifications on the use of bollards.
4. LP Gas Safety Rule 9.308: Opposed, we are not licensed to do electrical work or to govern their industry.
5. NFPA 58 6.29.3.3 Opposed, we had the ruling since 2001 this would be redundant.
6. LP Gas Safety Rule 9.2 NO to the deletion "repair" to cylinder and YES to "maintain". We need to be consist in definitions across agencies.
7. LP Gas Safety Rule 9.126 YES to the allowance of "electronic" pneumatic actuator.
8. LP Gas Safety Rule 9.143 YES to choices of engineered safety breakaway couplers.
9. LP Gas Safety Rule 9.134 YES to remove pressure test requirement and only require a leak check instead.
10. LP Gas Safety Rule 9.311 NO ceiling trusses in chicken house it is a corrosive situation.
11. NFPA 58 6.10.2.3 I Support the use of a two stage system.
12. NFPA 58 8.3.1 Yes to adoption as published to the set limits for indoor cylinder storage. NO would mean any size would be allowed indoors.
13. NFPA 58 9.6.2.2 Yes to adopt this section public safety in transporting cylinders ensures everyone's safety.
14. NFPA 58 Chapter NO to an Operations & Maintenance Manuel this should be more of a business decision not the RRC.

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