

Kellie Martinec

From: Todd Dorris <todd@roadrunner-energy.com>
Sent: Monday, November 18, 2019 8:58 AM
To: Rules Coordinator
Subject: Comments - LP Gas Safety Rules

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To Whom It May Concern –

The following are my comments on the proposed Railroad Commission of Texas adoption of rules related to LP Gas Safety:

1.OPPOSE

LP Gas Safety Rule 9.10 (d) Employee-Level Examinations.

The Railroad Commission's proposed rule to add container delivery unit drivers being required to take the bobtail examination.

Container delivery does not fall within the scope of the RRC, and job functions do not match a bobtail driver.

2.OPPOSE

LP Gas Safety Rule 9.140. (additional) Uniform Protection Standards.

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.

3.SUPPORT

The Texas Propane Gas Association's request the RRC to clarify the use of bollards in other installations requiring crash protection.

4.OPPOSE

Proposed revisions to LP Gas Safety Rule 9.308 Installation of Piping would require you to ensure the bonding requirements of NFPA 54 7.12.2 were met when connecting to or supplying a new piping system with corrugated stainless-steel tubing (CSST).

Opposed to certifying electrical work was done properly. The RRC does not train and certify any level of electrical work. Texas law does not allow an individual that is not

licensed as an electrician to conduct those services. To verify electrical work was performed correctly is outside the scope of knowledge and training.

5.OPPOSE

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

Preserve this exception to NFPA 58 we've had since 2001. The requirement is redundant and not needed!

6.OPPOSE

LP Gas Safety Rule 9.2 Definitions

Oppose the deletion of the definition of "repair to container," and support adding the definition of maintenance, so it is not classified as repair. Follow the DOT definition.

7.SUPPORT

LP Gas Safety Rule 9.126 Appurtenances & Equipment and 9.143 Piping & Valve Protection for Stationary Installations.

Support the request that the Commission allow for an "electronic" pneumatic actuator.

8.SUPPORT

LP Gas Safety Rule 9.143 (d)

Piping & Valve Protection for Stationary Installations.

The rule intends to provide a breakaway point, but the rule is outdated. Support adding additional choices: engineered safety breakaway coupler.

9.SUPPORT

LP Gas Safety Rule 9.134

Connecting Container to piping.

Support the Texas Propane Gas Association's proposal to remove the pressure test requirement and require a leak check instead.

10.OPPOSE

LP Gas Safety Rule 9.311 Special Exceptions for Agricultural.

Oppose 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.

11.SUPPORT

NFPA 58 6.10.2.3.

Pressure Regulators

Support removing the grandfather exception for single stage regulators over 100,000 BTU's. The two-stage system is safer.

12.SUPPORT

NFPA 58 8.3.1(a)(b)

Storage within Buildings

Support adopting this section as published, which sets limits to what size tank can be stored inside buildings.

Opposed to the RRC's proposed exception not to adopt this section. Without this section, it is my understanding, any size propane storage tank can be stored *inside* a business, hotel, dorm, apartment, daycare, educational, or healthcare building.

13.SUPPORT

NFPA 58 9.6.2.2.

Transportation of Containers

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

14.OPPOSE

NFPA 58, Chapter 15.

Operations & Maintenance.

Oppose the Railroad Commission's proposal in the adoption of chapter 15 which would require an Operation & Maintenance (O & M) manual for storage over 10,000 lbs. The RRC has created an exception stating the requirement pertains to 10,000 gallons or greater.

I am opposed - an O & M manual should be a business decision and not the RRC's.

Thank you for your time and consideration.

Sincerely,

Todd G. Dorris

Roadrunner Energy, Inc.
2621 East Main
Uvalde, Texas 78801

Office (830) 278-2915
todd@roadrunner-energy.com