

Kellie Martinec

From: Brent Wilkerson <brentw@squibbtaylor.com>
Sent: Monday, November 18, 2019 9:58 AM
To: Rules Coordinator
Subject: Amend Chapter 9--HB 2714, NFPA Updates

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I am submitting my comments and I also request my email address remains confidential.

1. OPPOSES to LP Gas Safety Rule 9.10 (d) Employee-Level Examinations.
2. OPPOSED to LP Gas Safety Rule 9.140. Uniform Protection Standards.
4. OPPOSED to Proposed revisions to LP Gas Safety Rule 9.308 Installation of Piping/Bonding Requirements
The Texas 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. OPPOSED to the RRC's adoption of the section 6.29.3.3 of the NFPA 58 2017 requiring a fire safety analysis
6. OPPOSED to the LP Gas Safety Rule 9.2 Definitions. No to the deletion of the definition of repair to container, and I do SUPPORT a Yes to adding the definition of maintenance, so it is not classified as repair. Follow the DOT definition.
7. SUPPORT the LP Gas Safety Rule 9.126 Appurtenances & Equipment and 9.143 Piping & Valve Protection for Stationary Installations. Yes to also request that the Commission allow for an electric or pneumatic actuator.
8. OPPOSED to the LP Gas Safety Rule 9.143 (d) Piping & Valve Protection for Stationary Installations.
9. SUPPORT the LP Gas Safety Rule 9.134 Connecting Container to piping and yes to the TPGA's proposal to remove the pressure test requirement, and require a leak check instead.
10. OPPOSED to the LP Gas Safety Rule 9.311 Special Exceptions for Agricultural. No to 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 the NFPA 58 6.10.2.3. Pressure Regulators. By removing the grandfather exception for single stage regulators over 100,000 BTU's to the two-stage system is safer.
12. SUPPORT the NFPA 58 8.3.1(a)(b) Storage within Buildings. Yes to adopting this section as published, which sets limits to what size tank can be stored inside buildings and I say No 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 the NFPA 58 9.6.2.2. Transportation of Containers. Yes to adopting this section this will ensure the public has rules they must follow while transporting propane.
14. OPPOSED the NFPA 58, Chapter 15. Operations & Maintenance Manual since most are redundant to existing rules.

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Regards,

Brent Wilkerson

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