

Summary of Comments -Periodic Update of Standards NPRM - December 11, 2009

Issue Categories	Primary Comments	Options for consideration
<p>1. Proposal to adopt, partially adopt, or not to adopt the latest edition of technical standard:</p> <p>a. NFPA 58 & 59 b. NFPA 59A c. ASTM D2513 d. LNGFIRE3 e. API Stds. updated since FR Notice/title changes f. Request to post standards on the web</p>	<p>a. PHMSA could simply exclude Small LP-Gas Systems section in NFPA 58. NFPA 59 2008 reduced confusing language, reorganized and expanded use of extracts vs. references.</p> <p>b. NFPA 59A references 70 other standards; most superseded or removed since the 2001. New editions do not consider how previous sections were internally cross-referenced. 59A references different version of ASME BPVC than are IBR in 193.</p> <p>c. 2007 allows longer outdoor storage time for PE pipe and requests Stay of Enforcement if not IBR. Delete reference to ASTM D2513 1987 as the 1999 restored the temperature marking requirement.</p> <p>d. PHMSA should reevaluate LNGFIRE3 model.</p> <p>e. Some newer editions released since NPRM and API corrected other titles.</p> <p>f. Request PHMSA post the standards on their web site.</p>	<p>a1.1. No change to current 2004 ed. reference to NFPA 58 and 59.</p> <p>a1.2. Address NFPA standards by a separate rulemaking along with primacy issue.</p> <p>or</p> <p>a2. Option as determined by TAC.</p> <p>b. PHMSA awaits 59A committee resolving the outstanding issues and address synchronization of standards IBR in 193 with those in NFPA 59A.</p> <p>c. PHMSA awaits resolution of on going discussion on these issues at the ASTM D2513 committee.</p> <p>d. Keep as is. The change solely references the new title of same model.</p> <p>e. Standards updated after the NPRM could not be IBR, except for title changes.</p> <p>f. Posting standards on web site would be in violation of copyright laws.</p>
<p>2. Proposal to change 192.11(c) to give primacies to Part 192 over NFPA 58 & 59.</p>	<ul style="list-style-type: none"> • Proposed change is substantive, need technical justification. • NFPA 59 covers petroleum gas utility plant safety. Part 192 is not appropriate for the design, construction, maintenance, and operations of process systems. • Physical properties of LPG are not compatible with the regulations for natural gas systems. Allowing NFPA 58 and 59 to control permits the differences to be addressed efficiently. • Examples of items adversely affected: <ul style="list-style-type: none"> ○ Frequency of relief valve inspection ○ Piping under NFPA 59 requires ASME B31.3 while Part 192 requires ASME B31.8. ○ Smaller systems will have to install regulators in a series where today they use one. ○ Operate LPG PE piping at 60 psig instead of 30 psig. 	<p>(1) PHMSA could address the subject of NFPA 58 and 59 primacies over Part 192 under a separate rulemaking, or</p> <p>(2) Have NFPA 58, 59 take primacy over certain sections and Part 192 over the remaining sections, or</p> <p>(3) Option as determined by TAC.</p>
<p>3. Request to clarify the reason for the proposed change to §192.557(c).</p>	<ul style="list-style-type: none"> • May misinform the true purpose of the proposed change. • The requirements of §192.553(d) would not be counteracted; additional code sections would need to be amended. • Longstanding application of the rule would be altered. 	<ul style="list-style-type: none"> • PHMSA could remove the proposed change to §192.557(c) from the final rule and consider this GPTC petition in a separate action. • Have GPTC re-petition with additional section changes or • Consider this action in conjunction with State - Industry Regulatory Review Committee II (SIRRC II) recommendations. <p>or</p> <p>Option as determined by TAC.</p>