Press Release

NFPA 58 COMMITTEE ISSUES MAJOR CHANGE FOR LPG FACILITY HOSE REQUIREMENTS

That new Passive Device requirement, promulgated by the National Fire Protection Association (NFPA) adoption process, is incorporated in the new edition of NFPA 58 for 2014, currently under development and aligns an existing Department of Transportation (DOT) rule that requires such automatic shut-off controls on mobile plat- forms such as transports, aimed at preventing volume releases of propane in the event of a hose separation due to a pull-away or failure of the hose itself or its components.

Where a facility hose is used at a LP-Gas bulk plant or industrial plant to transfer LP-Gas liquid from a cargo tank vehicle in non-metered service to a bulk plant or industrial plant, the facility hose or the facility shall be equipped with an emergency discharge control system that provides a means to shut down the flow of LP-Gas caused by the complete separation of the facility hose within 20 seconds and without the need for human intervention. The intent of the emergency discharge control system is to prevent the discharge of product in the event of a complete hose separation. Compliance with the requirement for emergency discharge control can be accomplished using a mechanical, pneumatic, or electronic device or any combination thereof. The committee modified the language to recognize alternatives to using the hose as the only means to comply.

“We believe that all hoses used in hazardous applications where damage to the environment, risk to personnel and surrounding communities and excessive liability abound, should have a passive capability to shut off the flow of product in the case of hose separation. This is but another step towards reaching this vision. Our customers are always trying to improve safety which is why they use GPSS, we believe it is our responsibility to ensure that this additional commitment is recognized by the regulatory agencies and that our customers are rewarded for their safer facilities and environments.”

About GPSS USA LLC

Global Passive Safety Systems is formed to take the next steps by providing, on a geographical basis, reliable, readily deployable and cost effective improvements in industrial safety. As the name declares we are a Global Company that is based upon the extensive experience of its founders and joint venture partners and believes that significant and measurable enhancements to industrial safety are achieved with deployment of “passive devices”. The essence of our mission is to increase the safety of all operations and facilities through the deployment of systems such as the "GPSS " and others.

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58-67 Log #44 Final Action: Reject
(6.18.2.6(3))

Submitter: Robert S. Blackwell, Independent Propale Co.
Comment on Proposal No: 58-111
Recommendation: Reject proposal 58-111 and reconsider in the 2017 cycle of NFPA 58.
Substantiation: 1. Proposal 58-111 is an impractical attempt to protect against a complete hose separation and neglects other hazards of the transfer connection such as failures of truck piping, failures of stanchion piping and failures of ACME fittings.

2. Nothing in 58-111 or the current code requires a pullaway to break the riser on the stanchion instead of the hose, the ACME fitting on the riser, the ACME fitting on the truck, or the truck piping. NFPA-58 para. 6.12.8 simply says " … so that any break resulting from a pull will occur on the hose or swivel-type piping side of the connection while retaining intact the valves and piping on the plant side of the connection." This text would mean that an unidentified part on the hose side should break before the stanchion is uprooted. Therefore a hose may remain intact while an uncontrolled discharge comes from piping that broke on the truck or the stanchion. A SmartHose® would not help this situation at all.

3. 58-111 leaves marketers who have facility hoses with two options:

a. Install Smart Hoses® on their facilities.

b. Remove the facility hoses and rely on the Smart Hose® carried on transports per DOT regulations or other truck systems that comply. This option would require the marketer to keep his ESVs in the check-valve mode, install check valves or rig his ESVs so that a hose separation would close them. This option would conflict with any low emissions requirement in the future.

4. 58-111 leaves marketers governed by the South Coast Air Quality Management District (SCAQMD) in Southern California with only one practical option. (See SCAQMD's Rule #1177, which is likely to be adopted statewide in the future and then possibly by other states.)

a. The practical option is to install Smart Hoses® on their facilities, or;

b. The impractical option is to rely on the Smart Hose® or other truck systems that comply with DOT regulations and are installed on transports. Whatever hose is carried on transports would need to be carried with propane inside to avoid venting. Such hoses would seem to need valves on both ends and hydrostatic valves as well.

This single practical choice of a patented and proprietary component seems inconsistent with NFPA's philosophy.

5. The current proposal will not put an end to the issues, such as the items mentioned above and partial hose ruptures. One would expect other proposals will deal with these same hoses piecemeal instead of systemically.

6. Safety is a blend of proper procedures, policies and equipment. 58-111 has an emphasis on equipment and too little on procedures and policies. Without procedures and policies and their oversight, no code would be followed and unapproved equipment would be commonplace.

7. Since the SmartHose® docket appeared to be stuck in TS&S's 1750 task force, another docket was opened to avoid the need for 1750. The new docket (1772) requires clear notice to all parties that a plant not fit for service should not be operated. Docket 1772 resulted in proposal 58-165, which was accepted by this NFPA committee. It requires plant owners to lock out plants that are unsuitable, which would also lockout dangerous facility hoses.

8. In both the Sanford and Tacoma accidents numerous parties, such as marketers, transport operators, AHJs, insurance carriers, plant owners and CETP could have had procedures in place to prevent both accidents. For example, marketers like me could be asking their contract transporters for evidence of training.

9. The proposal appearing in NFPA's ROP did not come from NPGA. NPGA's TS&S Committee has worked on a docket with a similar title but it has not yet considered a very long list of issues. Its work should be complete for the next revision cycle of NFPA-58.

Committee Meeting Action: Reject
Committee Statement: The committee expanded the language in 58-68 (Log #31) to recognize alternatives to the use of the hose to comply with the requirement. The committee recognizes that the action on 58-68 (Log #31) will not address all possible events that can occur during unloading of cargo tank vehicles in non-metered service.

58-68 Log #31 Final Action: Accept in Principle
(6.18.2.6(3) and A.6.18.2.6(3))

Submitter: Bruce J. Swiecicki, National Propane Gas Association / Rep. NPGA Technology, Standards and Safety Committee
Comment on Proposal No: 58-111
Recommendation: Revise NFPA 58 Proposal 58-111 by deleting existing 6.18.2.6(3) and A.6.18.2.6(3) and substituting the following:
6.18.2.6(3) A facility hose used at a LP-Gas bulk plant or industrial plant to transfer LP-Gas liquid from a cargo tank vehicle in non-metered service to a bulk plant or industrial plant, shall be equipped with emergency discharge control that provides a means to shut down the flow of an unintentional release of LP-Gas caused by the complete separation of the facility hose within 20 seconds and without the need for human intervention.
A.6.18.2.6(3) The intent of the emergency discharge control device is to prevent the discharge of product in the event of a complete hose separation. Compliance with the requirement for emergency discharge control can be accomplished using a mechanical, pneumatic, or electronic device or any combination thereof.
Substantiation: The actions taken by the NFPA Technical Committee on 58-111 established a new requirement in NFPA 58 to provide automatic protection for bulk plant and industrial plant facility hoses used to unload cargo tank vehicles greater than 3,500 gallons in non-metered service.
This comment intends to clarify the intent of the requirement, which is derived from the federal regulations contained in 49 CFR Part 173. In 6.18.2.6 (3), the term “passive shut off device” has been replaced by “without the need for human intervention” to more clearly describe the performance attribute that is required. In addition, we are proposing to define “facility hose” to remove any ambiguity from that term.
Committee Meeting Action: Accept in Principle
Revise NFPA 58 Proposal 58-111 by deleting existing 6.18.2.6(3) and A.6.18.2.6(3) and substituting the following:
6.18.2.6(3) Where a facility hose is used at a LP-Gas bulk plant or industrial plant to transfer LP-Gas liquid from a cargo tank vehicle in non-metered service to a bulk plant or industrial plant, the facility hose or the facility shall be equipped with an emergency discharge control system that provides a means to shut down the flow of LP-Gas caused by the complete separation of the facility hose within 20 seconds and without the need for human intervention.
A.6.18.2.6(3) The intent of the emergency discharge control system is to prevent the discharge of product in the event of a complete hose separation. Compliance with the requirement for emergency discharge control can be accomplished using a mechanical, pneumatic, or electronic device or any combination thereof.
Committee Statement: The committee modified the language to recognize alternatives to using the hose as the only means to comply.