

24 MAR 1994
3/30/94

MEETING LOG
DIRECTORATE FOR ENGINEERING SCIENCES

SUBJECT: Meeting with National Propane Gas Association
PLACE: East West Towers, Bethesda, MD
MEETING DATE: 3/4/94

LOG ENTRY SOURCE: Donald W. Switzer *DWS 81*

ENTRY DATE: 3/22/94

COMMISSION ATTENDEES:

Don Switzer	ES
Bill Menza	HS
Bob Franklin	EC
Larry Hershman	CA
Bill Rowe	EP
Joe Fandey	ES

NON-COMMISSION ATTENDEES:

Bruce Swiecicki	NPGA
Bill Butterbaugh	NPGA

MEETING SUMMARY:

The National Propane Gas Association (NPGA) is the trade association for the LP-gas distribution industry. NPGA requested this meeting to introduce their new Vice President of Technical Services, Bruce J. Swiecicki, P.E. A number of technical issues were also discussed, as summarized below.

SECTION 504 F of the ICBO Uniform Building Code

Several years ago, NPGA proposed to International Council of Building Officials (ICBO) that the Uniform Building Code (UBC) be amended to allow below grade residential LP-gas installation when a fuel gas detector was also installed. CPSC staff sent ICBO a letter asking that any decision on this issue be delayed, pending completion of a EPI contract study investigating the relative hazard of above grade versus below grade and natural gas versus LP-gas installations. NPGA's proposal was defeated.

At this meeting NPGA asked if staff still maintained its position in opposition to below grade installations. I responded that although the EPI contractor was unable to collect the needed data, and the contract failed to produce results, the staff continues to have reservations about amending the UBC to allow below grade LP-gas installations. NPGA requested that CPSC staff write a letter to ICBO explaining that the information we hoped

to gather was not available, and that ICBO should not delay consideration of the topic pending information from CPSC. I told NPGA staff that we would consider such a letter. I also asked that NPGA provide any information they have on the accident rates for below grade installation versus above grade installations. They responded that their data were, like ours, sparse, and that statistically valid data most likely are not available. They asked if we would accept data from the two major insurance companies that provide coverage to the LP-gas industry. CPSC staff responded that we would examine that information if available. Staff expressed a willingness to revisit the issue, provided data are supplied, and, based on that data, would reexamine our position.

CYLINDER FILLING

NPGA asked CPSC's support in responding to a possible change in the Model Weights and Measures Code. Exchange programs where consumers return empty twenty-pound LP-gas cylinders for full ones are becoming increasingly popular and widespread. NPGA asserts that this improves the safety of the distribution system because the twenty-pound cylinders are much more likely to be filled correctly when filled by properly trained personnel, as is the case in the exchange programs. CPSC staff has long been concerned about the level of training of employees at "Mom and Pop" operations.

The problem is that weights and measures personnel want each container sold in an exchange program to be labeled as to the amount of gas in the cylinder, the price per gallon, and the total price. This is because there is some variation in the volume of containers, and in container tare weight. Therefore, there is some variation in the amount of gas in the containers, and the weights and measures groups are concerned that consumers are being gouged because the gas is sold by container, at a fixed price. NPGA is concerned that if each container must be individually marked, the exchange programs will become uneconomical, and will be discontinued. NPGA is asking for CPSC support in pointing out the possible negative safety implications of requiring container markings. Staff proposed a possible compromise wherein the marketer would mark the container to contain some minimum amount of fuel less than the lowest possible amount of fuel in the container, and to charge the consumer on that basis. NPGA staff agreed to include this concept in their discussions with marketers and the weights and measures personnel. Staff will examine the issue, and take action as needed.

GAS GRILL CONNECTIONS

CPSC staff asked what position NPGA has taken on the Prest-O-Lite (POL) fitting versus Quick Disconnect (QD) fitting issue. NPGA staff responded that their membership is split on the relative merit of the POL versus the QD. The Association is

supportive of connectors having the safety attribute of over temperature protection, excess flow limitation, and leak protection. The Association has not taken a position on the issue of removing the POL as an option in the gas grill standard. Staff explained that the possibility of the use of old cylinders without the leak protection attribute (to prevent gas flow until a positive seal is achieved) is an important issue to the Commission staff. NPGA estimated more than 40,000,000 twenty-pound cylinders are currently in consumer hands. A number of possible options were briefly discussed, including retrofitting all existing cylinder when they are refilled, and the use of adapters. CPSC staff asked that our concern be relayed to the Association membership. It will be discussed at the Technology and Standards Committee meeting March 14 -16, 1994, which staff is scheduled to attend.

SULFUR COMPOSITION IN LP-GAS

NPGA has asked staff's assistance in responding to a proposed EPA requirement to limit the amount of sulfur present in LP-gas. At present there are industry specifications on the amount of corrosive sulfur (hydrogen sulfide) in LP-gas to prevent corrosion of the fuel system (and appliances by the production of corrosive combustion products). This specification does not include the sulfur included in the odorant. EPA apparently has established a target maximum for sulfur based on the industry standard, but is including the odorant in the total sulfur. NPGA reports that this action will force curtailment of the methods used to combat odorant fade permanently installed residential containers. (In new containers, or containers that have been open to the atmosphere, the LP-gas is over-odorized to make up for odorant lost because of sorption to the container walls.) CPSC staff asked for supporting information, and responded that it would examine the issue and take the appropriate action.

cc: Colin Church
Elizabeth Leland