



## MEETING LOG

**SUBJECT:** Meeting with Anneliese Wiltfang to discuss her research associated with propane equipment safety and any possible relevance to CPSC's NPR on proposed carbon monoxide safety requirements for gas furnaces and boilers

**FY 25 OP PLAN ENTRY:** Gas Appliances - CO Sensors

**DATE OF MEETING:** 11/18/2024

**LOCATION OF MEETING:** Virtual

**CPSC STAFF FILING MEETING LOG:** Ronald A. Jordan

**FILING DATE:** 11/22/2024

**CPSC ATTENDEE(S):**

Ronald Jordan, ESMC

David DiMatteo, OGC

Bret Griffin, ECON

Andrei Komarov, HS

John Topping, EPI

Tim Smith, ESHF

**NON-CPSC ATTENDEE(S):**

Anneliese Wiltfang, Pressure Testing Solutions (PTS) LLC


**Summary of Meeting:**

Ms. Wiltfang requested the meeting to discuss research she's conducted on the conditions of residential propane tanks and the pressure regulators on the tanks, and how those conditions might cause or contribute to possible hazards associated with the handling and usage of propane, including carbon monoxide production. She provided her research to CPSC staff in advance of the meeting.

The research consisted of anecdotal social media posts of propane-filling technicians' observations about the conditions of propane tanks and regulators during their duties refilling propane tanks. These posts included photographs that documented the condition of the equipment. In addition to fire and explosion hazards, Ms. Wiltfang believed her research indicated that the propane tank and regulator issues also contributed to incomplete combustion and CO production by gas furnaces and boilers. Ms. Wiltfang asked why CPSC did not consider gas leaks to be a cause of CO poisoning in the NPR for gas furnaces and boilers. Staff responded that CPSC based their data analysis used for the NPR on information reported in CO poisoning incident investigations involving gas furnaces and boilers and that these incidents are associated with appliances that




had been in operation and that CO is produced during combustion of gas.


Ms. Wiltfang stated that older tanks and outdated regulators depicted in the photographs were sources of fuel flow issues that could lead to incomplete combustion and the production of CO. She also stated that overfilling propane tanks could lead to excessive pressures and overfiring or flame quenching of the gas appliance. She stated that a heating, cooling, plumbing and electric  website (website name not provided) exists that includes articles and literature reviews and that this source promoted proper maintenance to prevent propane tanks and regulators from falling into disrepair. According to Ms. Wiltfang, Appendix C of NFPA 58 states that regulators placed in service prior to 1995 are to be replaced with newer regulators immediately.

In summary, Ms. Wiltfang expressed concerns about the following:

- the condition of propane tanks and regulators currently out in the field.
- the lack of leak testing on these propane tanks and regulators.
- the lack of reliability of tank pressure gauges, which might lead to tanks being overfilled.
- the lack of maintenance on existing propane tanks and regulators.
- improper installation locations for propane tanks; and
- that propane delivery techs tend to fill propane tanks, regardless of the above conditions.

Ms. Wiltfang proposed that the NPR consider these conditions, and for propane delivery companies to conduct gas leak checks on products in the field. She also stated that a 2018 NFPA report “Early Warning” emphasizes that gas leak calls by fire departments had increased. She stated that mandating leak checks of propane tanks and regulators would help address the occurrence of incomplete combustion and resultant CO

Staff informed Ms. Wiltfang that this anecdotal information, although concerning, was out-of-scope for the proposed rulemaking. Staff also suggested that some of the inspection, testing, and enforcement issues raised might be more appropriately addressed by the National Propane Gas Association (NPGA), the Department of Transportation, or state and local regulators who have jurisdiction over the propane tank and regulator conditions cited in Ms. Wiltfang’s research. 

 The meeting adjourned at 2:20 pm est.