



U.S. CONSUMER PRODUCT SAFETY COMMISSION
5 Research Place, Rockville, MD 20850

March 11, 2020

Secretary, NFPA Standards Council
National Fire Protection Association
1 Batterymarch Park
Quincy, Massachusetts 02169-7471

Re: NFPA 58-2020, TIA 1483

Dear Secretary:

U.S. Consumer Product Safety Commission (CPSC) staff has been actively participating in the development of safety requirements for consumer LP-gas appliances. CPSC staff¹ is aware of the proposed Tentative Interim Amendment (TIA) 1483 associated with NFPA 58-2020, *Liquefied Petroleum Gas Code*, Section 7.2.2.7, which requires that the face seal of CGA 791 and CGA 793 connections be examined for defects by qualified operating personnel before filling the cylinder. The submitter of the TIA proposes removing section 7.2.2.7 and provided the following statement as to why:

The new standard 7.2.2.7 is vague as to determination of "Defects" which may constitute the identification of imperfections or abnormalities that impairs quality, function, or utility, by definition, which can be interpreted to include proper material composition as well as assembly and design which are not visible. If 7.2.2.7(A) is impossible to fulfill it is likewise impossible to enforce. The intent of 7.2.2.7 is paramount in the prevention of accidents but must be properly defined and stated. It should be removed and a Task Group formed to establish proper procedure and methodology.

CPSC staff is concerned that removing Section 7.2.2.7 will have a negative impact on the safety of cylinder usage because it is important that defects are detected and it is not likely that the consumer is knowledgeable in identifying the impairments of face seal. It is more appropriate that the inspection be executed by the qualified operating personnel who fill the cylinder, as currently required. Section 7.2.2.7 should not be removed, however CPSC staff could support forming a working group to revise the wording of the section for future consideration.

¹ The views or opinions expressed in this letter are solely those of the staff, and these views do not necessarily represent those of the Commission.



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Sincerely,

A handwritten signature in black ink, appearing to read "A. Ayers", is written over a light gray circular background.

Scott Ayers
Voluntary Standards Specialist
sayers@cpsc.gov

Cc: Patricia Edwards, CPSC Voluntary Standards Coordinator