

Views/Comments Received on Draft PNGRB (Technical Standards and Specifications including Safety Standards for LPG Storage, Handling and Bottling Facilities) Regulations, 2018

S No.	Clause No.	Original Clause	Views/Comment	Sub-Committee Recommendations
1		<p>3. Scope</p> <p>(1) Requirements of these regulations shall apply to all existing and new LPG Storage, Handling and Bottling Facilities excluding process units at refineries, gas processing plants. For LPG pipelines and its associated facilities, the PNGRB (Technical Standards and Specifications including Safety Standards for Petroleum and Petroleum Products Pipelines) Regulations, 2016 shall be referred.</p>	<p><u>Aegis Logistics:</u></p> <p>To Modify: Requirement of these regulations shall apply only to dedicated new LPG storage handling and bottling facilities. This doesn't cover LPG facilities which are part of Isolated storage terminals which are also handling petroleum and non petroleum products.</p>	<p>Retain the existing clause.</p>
2		<p>6. The standard.</p> <p>(2) Technical standards and specifications including safety standards (hereinafter referred to as standards) for capacity up-to 100 MT and maximum bottling of 20 MT per day on design, layout, storage, loading / unloading, operation LPG storage, handling and bottling are specified in Schedule – 2. Further, schedule – 2 also specifies the additional minimum safety requirements on design, layout, storage, loading / unloading, operation at LPG installations having Bulk Storage (a) exceeding 100 MT but limited to 300 MT for aboveground storage and also for (b) 450 MT in mounded or in combination of aboveground and mounded storage of LPG or total bottling quantity exceeding 20MT but limited to 50 MT per shift of 8 hrs. For LPG Storage, Handling and Bottling Facilities exceeding either of the above limits, Schedule – 1 shall be applicable.</p>	<p><u>RIL:</u></p> <p>To Modify: The Permissible maximum bottling capacity with additional Safety requirement has been secified as 35MT per shift of 8 hrs but the Scope of Schedule 2 under clause 1.0 specifies that total bottling quantity not exceeding 50 MT per shift. of 8 hrs.</p> <p>The Number "35MT" should be corrected to "50 MT".</p>	<p>The correction of 35 MT to 50 MT is to be incorportaed in line with revised OISD standard.</p>

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3		<p>7. Compliance to these regulations</p> <p>(3) If an entity has laid, built, constructed, under construction or expanded the LPG facilities based on some other standard or is not meeting the requirements specified in these Regulations, the entity shall carry out a detailed Quantitative Risk Analysis (QRA) of its infrastructure. The entity shall thereafter take approval from its highest decision making body or its Board for non-conformities and mitigation measures. The entity's Board approval along with the compliance report, mitigation measures and implementation schedule shall be submitted to PNGRB within six months from the date of notification of these Regulations.</p>	<p><u>RIL:</u></p> <p>To Modify: If an entity has laid, build, constructed, under construction or expanded the LPG Installation based on some, other standard or is not meeting the requirements specified in these Regulations, the entity shall carry out a detailed Quantitative Risk Analysis (QRA) of its infrastructure and for non-conformities shall take suitable mitigation measures.</p> <p><u>BPCL</u></p> <p>To Modify: The Regulation should not be applicable to existing LPG plant LPG facilities. However, this clause will be applicable only facilities under construction or proposed for expansion and new facilities .</p>	Retain the existing clause.
4		<p>8. Default and Consequences.</p> <p>(2) In case of any deviation or shortfall in compliance to these Regulations, the entity shall be given time limit for rectification of such deviation, shortfall, default and in case of non-compliance, the entity shall be liable for any penal action under the provisions of the Act or termination of operation.</p>	<p><u>RIL:</u></p> <p>To be Omitted: Cause should not be part of the technical standard as it is covered in the Act.</p>	Retain the existing clause.
5		<p>9. Requirements under other statutes</p> <p>It shall be necessary to comply with all statutory rules, regulations and Acts in force as applicable and requisite approvals shall be obtained from the relevant competent authorities for LPG Storage, Handling and Bottling Facilities.</p>	<p><u>RIL:</u></p> <p>To be Omitted: This technical standard should limit dealing with statutes covered under PNGRB Act.</p>	Retain the existing clause.

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6		<p>10. Miscellaneous</p> <p>(2) The Board may at any time effect appropriate modifications in these Regulations.</p>	<p><u>RIL:</u></p> <p>To Modify: Modifications in regulations shall be applicable on post facto basis.</p>	Retain the existing clause.
7	1.3 (v)	<p>The following aspects shall be considered while establishing layout of LPG storage vessels. Bullets or spheres are used for above ground storage of LPG.</p> <p>v. Storage vessels shall be laid out in single row in each group.</p>	<p><u>BPCL:</u></p> <p>The MSV not covered in this clause.</p>	The existing 1.3 clause " The following aspects shall be considered while establishing layout of LPG storage vessels. Bullets or spheres are used for above ground storage of LPG." to be modified as "The following aspects shall be considered while establishing layout of above ground LPG storage vessels. Bullets or spheres are used for above ground storage of LPG."
8	1.3 (v) & 2.2.2 (xiii)	<p>1.3 (v.) Storage vessels shall be laid out in single row in each group.</p> <p>2.2.2 (xiii.) Where more than one row is installed the adjacent ends of the vessel in each row shall be separated by not less than 3 meter.</p>	<p><u>BPCL:</u></p> <p>Both Cluase are contradicting to each other. Hence clarity need to be taken.</p>	Retain the existing clause.
9	1.4.1 (v)	<p>In case of mounded vessels, a kerb wall of appropriate height and size and designed to contain the LPG spillage from pipeline manifold and to direct it to a safe location at appropriate distance shall be provided.</p>	<p><u>BPCL:</u></p> <p>This arrangement to be provided for Pipeline manifold of MSV's and should not be applicable to mounded vessels.</p>	Retain the existing clause.
10	1.5.10	<p>LPG tank truck parking area (Bulk/ Packed) shall be located in a secured area with entry/ exit gates. Parking area shall be provided with adequate no. of hydrants / monitors to provide firefighting coverage for entire parking area from all sides. Parking area's entry / exit gates and the parking area shall be under real time visual supervision (security guard/ CCTV cameras). Proper slotting/ marking shall be done for safe parking of bulk and packed lorries in parking area.</p>	<p><u>HPCL:</u></p> <p>To Modify: LPG tank truck parking (Bulk/ Packed) shall be located in a secured area with entry exit gates. Parking area shall be provided with adequate no. of hydrants/ monitors to cover the entire parking area.</p> <p><u>BPCL:</u> LPG tank truck parking area (Bulk/ Packed) shall be located in a secured area with entry/ exit gates. Parking area shall be provided with adequate no. of hydrants / monitors to provide firefighting coverage for entire parking area . Parking area's entry /exit gates and the parking area shall be under real time visual supervision (security guard/ CCTV cameras) . Proper slotting/ marking shall be done for safe parking of bulk and packed lorries in parking area .</p>	Retain the existing clause.

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11	1.5.11	<p>Parking area shall be adequate for parking of bulk lorries & packed lorries so as to avoid parking of the bulk/packed trucks on the plant approach road. Parking area shall be adequate to accommodate (minimum) following requirements of the plant: -</p> <p>a. Bulk lorries required for 8 hours of maximum rated capacity of the plant bottling. b. In case of bulk loading location, bulk lorries required for 8 hours of maximum rated bulk loading capacity of the plant. c. Packed lorries required for 4 hours of maximum rated capacity of the plant bottling.</p> <p>The requirement of parking area can be optimized based on the fleet management system, however the bulk or packed lorries shall not be parked near the vicinity of the plant.</p>	<p>HPCL:</p> <p>To Modify: Parking area shall be adequate to accommodate (minimum) following requirements of the Plant:- (a) Bulk Lorries required for 8 hours of maximum rated capacity of the plant bottling. (b) In case of bulk loading location bulk lorries required for 8 hours of maximum rated bulk loading capacity of the plant. (c) Packed lorries required for 4 hours of maximum rated capacity of the plant bottling.</p>	<p>The clause can be modified as under : Parking area shall be adequate for parking of bulk lorries & packed lorries so as to avoid parking of the bulk/packed trucks on the plant approach road. Parking area shall be adequate to accommodate (minimum) following requirements of the plant: -</p> <p>a. Bulk lorries required for 8 hours of maximum rated capacity of the plant bottling. b. In case of bulk loading location, bulk lorries required for 8 hours of maximum rated bulk loading capacity of the plant. c. Packed lorries required for 4 hours of maximum rated capacity of the plant bottling.</p> <p>The requirement of parking area can be optimized based on the fleet management system, however the bulk or packed lorries shall not be parked near the vicinity of the plant.</p>
12	1.6.3	<p>Separate sheds for filled cylinders storage, valve changing and degassing shall be provided. Degassing unit can also be provided in valve change shed, however closed loop vent pipe arrangement shall be provided for venting out the gas released during water filling at a height not less than 1.5 m above the eaves of the shed.</p>	<p>HPCL:</p> <p>To Modify: Separate sheds for filling of cylinders, for filled cylinders storage, for valve changing and degassing shall be provided. Valve changing unit without evacuation can be provided in the filling shed itself. Vapour extraction and GMS have been recommended to be provided at the degassing point.</p> <p>BPCL: Separate sheds for filled cylinders storage, offline valve changing and degassing shall be provided. Degassing unit can also be provided in valve change shed, however closed loop vent pipe arrangement shall be provided for venting out the gas released during water filling at a height not less than 1.5 m above the eaves of the shed.</p>	<p>Add the requirement of GMS in the degassing / valve changing shed.</p>
13	1.6.12	<p>All steps forming part of the escape routes shall be minimum 1.2 M with treads 30 cms (minimum) and maximum rise of 15 cms.</p>	<p>BPCL:</p> <p>All steps forming part of the escape routes shall be minimum 1.2 M with treads 30 Cms (minimum) and maximum rise of 15 Cms.</p>	<p>To modify the clause as under :All steps forming part of the escape routes shall be minimum 1.2 M with treads 30 Cms (minimum) and maximum rise of 15 Cms.</p>

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14	1.7.4	In case provision for green belt is made, the same shall be segregated from hazardous area by 1 M high wall / chain link fencing. Alternatively, it shall be treated as a part of hazardous area.	BPCL: Hazardous and Non-Hazardous area to be segregated by 1M high wall/chain link fencing . (Green belt area segregation is not applicable , however green area is being provided as per norms)	Retain the existing clause.
15	2.2.2 (ii)	Mounded vessel(s) shall be placed on a firm foundation and installed so as to prevent movement or floatation. The sub-soil water, rainwater or any other surface water should not be allowed to percolate in to the mound. The foundation should be constructed such that in the longitudinal direction of a vessel slope of at least 1:200 is maintained to facilitate draining of the vessel. Reference may be made to attached Drawing-1 and Drawing-2.	BPCL: Drawing not found.	Drawing to be attached
16	2.2.3 (v)	Nozzles for two independent level indicators, a high level switch, two safety relief valves, pressure gauge and a manhole shall be provided on top.	BPCL: Nozzles for two independent level indicators, a high level switch, two safety relief valves, pressure gauge and two manholes shall be provided on top.	Retain the existing clause.
17	2.4 (iv)	All carousels including electronic ones & leak detectors shall be of the type approved by PESO.	BPCL: All carousels including electronic ones & leak detectors shall have type approval by PESO.	Modify the clause :All carousels including electronic ones & leak detectors shall have type approval by PESO.
18	2.7 (iii)	iii. Compressor shall be provided with the following features as a minimum : <ul style="list-style-type: none"> - Pressure gauges in suction and discharge. - Temperature gauge in discharge - Discharge safety valve and a vent valve, their outlets leading to flare/ safe height outside the shed. - Low Suction Pressure Trip - Suction strainer - High Discharge Pressure Trip - High Temperature Trip - Low cooling water pressure/flow trip - Check valve in discharge - A discharge to suction recycle valve for achieving capacity turndown during startup. 	BPCL: To be Added: Low Cooling water flow switch - Trip	Modify and add the Low Cooling water flow switch - Trip

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19	2.14.4 (iii)	Electrical equipment including for lighting system shall conform to hazardous area classification and be selected in accordance with IS:5571. These shall be tested by agencies such as CIMFR, ERTL, CPRI or independent test laboratory of country of origin for such equipment. Indigenous Flameproof equipment shall comply with relevant BIS standard as per requirements of statutory authorities. All equipment used in hazardous area shall have PESO approval.	BPCL: To Modify: These shall be tested by agencies such as CIMFR, ERTL, CPRI or independent test laboratory of country of origin for such equipment. Indigenous Flameproof equipment shall comply with relevant BIS standard as per requirements of statutory authorities. All equipment used in hazardous area shall have PESO approval.	Modify the clause as under : Electrical equipment including for lighting system shall conform to hazardous area classification and be selected in accordance with IS:5571. These shall be tested by agencies such as CIMFR, ERTL, CPRI or independent test laboratory of country of origin for such equipment. Indigenous Flameproof equipment shall comply with relevant BIS standard as per requirements of statutory authorities. All equipment used in hazardous area shall have PESO approval.
20	2.16 (ii)	Protection against Static discharges.	BPCL: Protection against Static charges only to be considered .	Retain the existing clause.
21	2.16 (iii)	Electrical equipment fencing (e.g. transformer yard etc.)	BPCL: Electrical equipment fencing (e.g. transformer yard etc.)	Retain the existing clause.
22	2.16 (ix)	An independent earthing network shall be provided for lightning protection.	BPCL: An independent earthing network shall be provided for lightning protection and this shall not be connected with the main earthing network .	Retain the existing clause.
23	3.3.8 b (iii)	IEFCV shall be examined for its proper operation along with SRV, once a year by competent person.	BPCL: IEFCV shall be examined for its proper operation along with SRV, once a year by competent person.	Retain the existing clause.
24	3.3.8 c	The functional parts of EFCV of pressure gauge shall remain within its coupling. In addition, the pressure gauge if not provided in recessed cup shall be adequately protected with a shroud.	BPCL: The pressure gauge should be Provided with isolation valve with lock open arrangement.	Modify the clause as under : The functional parts of EFCV of pressure gauge shall remain within its coupling. In addition, the pressure gauge should be provided with isolation valve with lock open arrangement.

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25	5.2	<p>BULK HANDLING FOR MOVEMENT BY RAIL</p> <p>LPG is moved in Tank Wagons by the Railways. These wagons are designed by RDSO and are fitted with various devices for safe transportation and operations. The loading facilities are similar as for tank truck loading while unloading of LPG from tank wagons shall be done with the help of compressor. The compressor is used to create a differential pressure between the receiving and discharging vessels by withdrawing vapors from the receiving vessel and forcing it at high pressure into the discharging vessel thereby establishing a smooth flow. The content of the tank wagons at loading locations can be ascertained by weighment on weigh bridge or alternatively by, mass flow meters. The content of the wagons at unloading locations can be taken as per the stock transfer document or Product dispatch note received from the loading locations or by weightment on weigh bridge etc.”</p>	<p>BPCL:</p> <p>"The content of tank wagons can be ascertained by weighment on weigh bridge before and after emptying or, alternatively, mass flow meters can be used."</p> <p>To be replced with:</p> <p>The content of the tank wagons at loading locations can be ascertained by weighment on weigh bridge or alternatively by, mass flow meters. The content of the wagons at unloading locations can be taken as per the stock transfer document or Product dispatch note received from the loading locations.</p>	<p>Modify the clause as under : BULK HANDLING FOR MOVEMENT BY RAIL</p> <p>LPG is moved in Tank Wagons by the Railways. These wagons are designed by RDSO and are fitted with various devices for safe transportation and operations. The loading facilities are similar as for tank truck loading while unloading of LPG from tank wagons shall be done with the help of compressor. The compressor is used to create a differential pressure between the receiving and discharging vessels by withdrawing vapors from the receiving vessel and forcing it at high pressure into the discharging vessel thereby establishing a smooth flow. The content of the tank wagons at loading locations can be ascertained by weighment on weigh bridge or alternatively by, mass flow meters. The content of the wagons at unloading locations can be taken as per the stock transfer document or Product dispatch note received from the loading locations or by weightment on weigh bridge etc.”</p>
26	11.3 b.	<p>As there is no storage of cylinders in the loading/unloading fingers, spray system can be taken as separate zone within independent deluge valve to optimize the fire water requirement.</p>	<p>BPCL:</p> <p>As there is no storage of cylinders in the loading/ unloading fingers, spray system can be taken as separate zone with independent deluge valve to optimize the fire water requirement .</p>	<p>Retain the existing clause.</p>
27	11.14.3 vi)	<p>Each pump shall be checked & tested for its performance once in six months by operating required nos. of hydrant/monitors depending upon the capacity of the pump to verify the discharge pressure, flow and motor load are in conformity with the design parameters. Alternatively, the recirculation method can be employed.</p>	<p>HPCL:</p> <p>Clause to be omitted.</p>	

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28	Schedule-2 4.0 iii	The maximum filling in single shift shall not exceed 50 MT	BPCL: "The maximum filling in single shift shall not exceed 35 MT." To be replced with: "The maximum filling in single shift shall not exceed 50 MT."	Modify the clause to limit maximum filling to 50 MT.
29	Schedule-3	Schedule -3 Design, Layout, Operation & Maintenance of Refrigerated LPG Storage 2.0 SCOPE This standard lays down the minimum safety requirements for Design, Layout, Operation & Maintenance of Refrigerated LPG Storage facilities. The facilities at port and the associated cross-country pipelines are not part of the scope of the present standard. This standard does not cover the buried / semi buried refrigerated LPG storage facilities. The requirements of Schedule 1 shall be applicable after the point LPG is no longer in Refrigerated State.	RIL: To Clarify: Since Provision under schedule 3 like "5.0 Terminal Layout" & "7.5 Fire protection System for LPG terminals" etc are specific to Standalone LPG storage Terminals. Scope under clause 1.0 should clarify that the Refrigerated LPG storage located inside the Refinery or petrochemical plant are excluded from the Scope.	Modify the scope to exclude these requirements for refinery or petrochemical plant scope as these would be defined in refinery / gas processing plant stoarge if these are part of process units. However, offsite storage in Refinery / petrochemical plant should eb guided by these stipulations.
30	Schedule-3 4.4 (i)	An auto-refrigeration system comprising of positive displacement compressors, LPG condenser and liquid receiver is provided to maintain refrigerated LPG tank pressure. The auto-refrigeration system compensates for heat gain in the tank, headers and in tank pump heat.	BPCL: The terminology of "Auto refrigeration system" should be replaced with "vapour recovery system" for the compressor systems.	Modify the clause with vapour recovery system for auto referigeration system
31	Schedule-3 6.1		BPCL: To be Added: Condensation of vapours in annular space and its removal methodology.	No change
32	Schedule-3 6.6		BPCL: Closed blow down system shall be provided in process units.	No change
33	Schedule-3		BPCL: Proper pressure balancing of inner and outer tank to be considered in the Design.	No change

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34			<p><u>Aegis Logistics</u></p> <p>To Modify: a) Revise the separation distances between facilities as given in SMPV 2016 (tables 3, 4A and 4B of SMPV 2016). b) Separation distance between facilities and under ground / mounded storage to be given separately as per SMPV 2016 as included in SMPV 2016 Table 3</p> <p>To Omit: Regulation Sr. No. 7 since PESO is already monitoring</p>	Retain the existing clauses

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35			<p><u>Aegis Logistics</u></p> <p>To be omitted: Following clauses which are not in SMPV 2016 / GCR 2016 (were left to the discretion of the designers/operator) should not be added in proposed PNGRB rules</p> <p>Schedule 1A</p> <ul style="list-style-type: none"> i) 1.4.1 ii) 1.4.3 iii) 1.5.3 iv) 1.5.9 v) 1.5.10 vi) 1.5.11 vii) 1.6 viii) 1.7.2 ix) 1.7.4 x) 2.2.4. iv xi) 2.2.4. vii xii) 2.3.1. i xiii) 2.3.1. iii xiv) 2.3.1. iv xv) 2.3.1. vi xvi) 2.3.1.vii xvii) 2.3.2. i. b xviii) 2.3.2. ii xix) 2.3.3. ii xx) 2.4. vi xxi) 2.5.2. ii xxii) 2.6 xxiii) 2.7 xxiv) 2.12 	Retain the existing clauses

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36			<p><u>Aegis Logistics</u></p> <p>To be revised: Following schedule shall be revised based on SMPV Rules 2016 i) Schedule 1A- Design and Layout ii) Schedule 1H- Fire Protection Facilities</p> <p>To Omitted: Following Schedules should be deleted i) Schedule 3 ii) Schedule 4</p>	

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37			<p><u>PESO:</u></p> <p>The following Clause are not in conformity with the provisions specified in SMPV(U) Rules, 2016:</p> <ul style="list-style-type: none"> a. Clause 2(h)- for compressed gas b. Schedule-1A –clause 1.4.1. iv- for spillage diversion area c. 1.4.5- for safety distance between two groups of vessels d. Table II e. Schedule -1B-clause 3.3.8.a.i-for safety relief valve <p>The Clause 2(s) pertaining to hazardous area is for petroleum/ flammable liquids whereas the subject draft document is for LPG.</p> <p>The Clause 3.6, 3.6.2, 5.2.2 of Schedule 1B pertains to Petroleum products, petroleum class ‘A’ whereas the document is for LPG.</p> <p>Regulations name to be replaced with:</p> <ul style="list-style-type: none"> a. Static and Mobile Pressure Vessels (Unfired) Rules, 1981 replced with Static and Mobile Pressure Vessels (Unfired) Rules, 2016 b. Gas Cylinders Rules, 2004 replaced with Gas Cylinders Rules, 2016 c. Petroleum Rules, 1976 e replaced with Petroleum Rules, 2002 d. Transportation of LPG by road is regulated by PESO under SMPV(U) Rules, 2016 and not under Petroleum Rules as mentioned in Schedule-1B Clause 3. 	Retain the existing clauses

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38			<p><u>PESO:</u></p> <p>The clause Nos. 1(1), 3, 4, 5, 7 of the subject technical standard pertaining to Application, Scope, Objective and Compliance to these regulations make it mandatory on the entities to obtain approval from PNGRB and also monitoring of compliance by PNGRB which should not be the spirit of any technical standard and specification on safety related issues.</p> <p>The various clauses of the technical standards and specifications of the subject document dealing as regulations including monitoring of compliance by PNGRB, if implemented will result in conflict of Acts & Rules administered by PESO. PESO is responsible for ensuring implementation of the various provisions of Gas Cylinder Rules, 2016, SMPV (U) Rules, 2016, Petroleum Rules, 2002 & MSIHC Rules, 1989 as mentioned above. The stakeholders will also be required to obtain approval from PNGRB for the same installations/facilities as per the said document resulting into duplication of requirements to be complied by the stakeholders defeating the very purpose of Govt. of India initiative of single window system. This may also lead to legal complexity. Duplication/conflicting provisions need to be redressed.</p>	Retain the existinhg clauses
39			<p><u>OISD</u></p> <p>It is observed that OISD Standards cover various topics in much greater details where as the same is not there in T4S. For example, “LPG Tank Trucks: Requirement of safety on design / fabrication and fitting”, “Piping Safety in installation and maintenance of LPG Cylinders Manifold” and “Small LPG Bottling Plants (Design and Fire Protection Facilities)” require in depth detailing in T4S to serve any useful purpose.</p>	Comments considered appropriately in the Regulations

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40			<p>It may be mentioned that “Piping Safety in installation and maintenance of LPG cylinders manifold” has been covered in a single page in the entire T4S which does not do justice to such installation which exists in residential complexes, restaurants and canteens located in malls, hotels, hospitals, nursing homes etc. On the other hand, OISD-STD-162, the document from which one-page T4s has been derived, is meant for enhancing the safety of such installation is a very detailed document being followed by the sector extensively.</p> <p>In PNGRB T4S, heat detection based auto operated Sprinkler System with Deluge Valve has been prescribes manual operated sprinkler system which is dilution of clause 5.9.1 of OISD-GDN-169. It may be mentioned that for small plants, bottling more than 20 MT LPG per day. Latest amended OISD-GDN-169 prescribes heat detection based auto operated sprinkler system with deluge valve based fire protection for not only LPG storage vessels but also for other areas like LPG Sheds, TLD and LPG Pump & Compressor House etc, as there is definite time gap between manual mode and auto mode operation which can prove to be disastrous in case of fire.</p> <p>Receipt of bulk LPG through LPG Pipeline in receiving location has not been covered in T4S. Whereas OISD specifies the regulations to be followed in OISD-STD-214: Cross Country LPG Pipelines.</p>	
41				<p>Modify the clause 1.4.1 iv as under : Spillage diversion area shall be located at a distance where the flames from fire will not impinge on the vessel. This distance shall not be less than 15 m from the nearest vessel . No accumulation of LPG shall be permitted underneath the storage vessel.</p>
42				<p>Modify the clause 5.2.4. (iv) as under : The method adopted to make the wagon free from LPG is to fill the wagon completely with water and allow to overflow for an hour. Pump out the water after 24 hours. Alternatively, steam / inert gas can be used for degassing.</p>

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43	2.12 (ii) (iii)	High level Alarm switch set at 85% with trip and switchover arrangement.	<p><u>IOCL</u></p> <p>On 85% alarm in evacuation vessels, either changeover of evacuation vessel or tripping of LPG vapour compressor should take place.</p> <p>If both tripping and changeover of vessels are provided, then vapour compressor would not start till liquid in first tank comes below 85%. Bringing the liquid below 85% is possible only by switching on the vapour compressor after changing over of the vessels.</p> <p>Therefore, the requirement should be “High level Alarm switch set at 85% with trip or switchover arrangement”</p>	<p>Modify the Clause as Under:</p> <p>High level Alarm switch set at 85% with trip or switchover arrangement.</p>
44	6.8 (i)	Cylinders shall be sealed with PVC seal or Aluminum seal. Seal shall have identification mark of oil company, preferably name of plant and period of filling.	<p><u>IOCL</u></p> <p>Period of filling on seal has no relevance since properties of LPG do not change with time and LPG has no expiry date for usage.</p> <p>Therefore period of filling not required on seals.</p>	<p>Modify the Clause as Under:</p> <p>Cylinders shall be sealed with PVC seal or Aluminum seal and such seal shall have identification mark of oil company and preferably name of plant.</p>