



Bruce J. Swiecicki, PE
Vice President, Technical
And Regulatory Services

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Mr. Don Onwiler
National Conference on
Weights and Measures

Re: LPG-24.1, LPG-24.2, OTH-24.1

Don,

Please allow make available this additional explanation for the proposals I submitted to modify Handbook 44, including LPG-24.1, LPG-24.2 and OTH-24.1.

You and your members are no doubt aware that at the NCWM Annual Meeting in Norfolk, LPG-23.1 was relegated to Informational Status. U-Haul International was very disappointed in the outcome and has decided not to participate in this continuing effort for the time being. However, since NPGA represents about 2,500 member companies, several of which are affected by the regulations contained in Handbook 44, we are continuing to search for practical solutions that meet the objectives of both NPGA members and the NCWM.

To that end, I decided it might be best to let LPG-23.1 remain as is (since I wasn't even sure how to pursue continued development of that proposal in its current status and the August 15 deadline was quickly approaching). Since the new proposals would accomplish the same goal as was the intent of LPG-23.1 and that proposal appears to be "dead in the water," I would not oppose a movement to withdraw LPG-23.1.

The three proposals I submitted during the 2024 cycle should accomplish the goal we are trying to achieve, which is to acknowledge that new and modern LPG retail electronic dispensers used to fill modern vehicle fuel tanks will continue to be in compliance with the requirements of Handbook 44. Older mechanical retail dispensers that do not have electronic controls and fill mostly cylinders and occasionally older vehicles (of those, most are of the fleet type and not in retail service) would be allowed to continue in use without the difficulty and expense of retrofitting automatic setback technology.

To accomplish this goal, perhaps the best place to start is with the definition of “liquefied petroleum gas retail motor-fuel device” as modified in OTH-24.1. The key to these modifications is in the “Note,” which precisely defines the characteristics of the device. These are electronic devices that will no doubt meet the requirements for zero setback in Handbook 44. The safety features provided by the Type K15 nozzle are now required by NFPA 58-2024 for dispensers, although the K15 fill valve has been required to be installed on all “over-the-road” vehicles since 2017.

One concern expressed by members of the NCWM and NIST pertained to the retrofit rate of older vehicles that do not use the K15 connection. Members of NPGA who are involved in the business continue to inform me that there is a high rate of retrofitting vehicles with the K15 safety fill valve, which further supports the notion that LP-gas sold as retail motor-fuel will increasingly be dispensed into vehicles that have the K15 fill valve connection.

Proposal LPG-24.1 is simply an effort to correlate the term used in Appendix D with all the instances where that device is referred to in the requirements for LPG retail motor-fuel dispensing. LPG-24.2 is also an effort to correlate S.2.5.1 and S.2.5.2 with the terminology used in Appendix D for LPG retail motor-fuel dispensers. One aspect of the proposal would be to make S.2.5.1 retroactive. That was an effort to resolve some concerns expressed during the meeting in Norfolk regarding the discrepancy of dates with the non-retroactivity clause in S.2.5.2. In retrospect, I’m not sure that the change is even needed. I would not be opposed to recommendations to remove that part of the proposal and stay with the non-retroactivity date currently in Handbook 44.

In conclusion, I’m hopeful that the NCWM will support OTH-24.1, LPG-24.1 and LPG-24.2. I really appreciate the opportunity to provide more information and hopefully clarify these proposals. Please let me know if you need any additional information.

Sincerely,

