



State of Utah

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## Utah Department of Public Safety

JESS L. ANDERSON  
*Commissioner*

### Utah State Fire Marshal

COY D. PORTER  
*State Fire Marshal*

November 20, 2018

Utah Public Service Commission  
160 East 300 South  
Salt Lake City, UT 84111

Dear Commissioners,

Following the passage of HB 422 in the 2018 legislative session, it came to our attention that there is no plan in place to handle the decommissioning of consumer-owned propane tanks if the natural gas infrastructure expands. We are also concerned about the evacuation of propane from those tanks, both above and below ground during the decommissioning process.

There is good reason for our concern. Several years ago, the natural gas industry expanded into Richfield, Utah, and an underground propane tank was abandoned. During a future parking lot expansion, the abandoned tank was hit by construction equipment, which put the construction workers on the site in danger because they did not realize a propane tank had been abandoned under the site. Luckily, a former propane company employee was able to identify the tank and assist in resolving the resulting leak, thereby resolving a potentially dangerous situation.

The 2015 International Fire Code (IFC), as adopted by the State of Utah, requires the removal of tanks placed permanently out of service:

IFC Section 6110.2 Permanently out of service. LP-gas containers to be placed permanently out of service shall be removed from the site.

The Liquefied Petroleum Gas code, NFPA 58 is the state adopted standard that outlines the storage of these containers once they have been placed out of service:

NFPA 58 Section 6.3.2 ASME containers of 4,000 gal (15.2 m<sup>3</sup>) or less that have been removed from service but that contain LP-Gas shall be stored outside of buildings in accordance with either (1) or (2):

(1) Containers shall be located either at a bulk plant or in an approved area.

(2) Containers not complying with (1) shall comply with the following:

(a) Containers shall be located in a manner that will minimize exposure to physical damage.

(b) Containers shall be oriented so that the pressure relief valve remains in communication with the vapor space.

(c) Containers shall not be located on roofs of buildings.

(d) Valve outlets on ASME containers shall be plugged or capped.

(e) Where screw-on-type caps or collars are utilized on ASME containers, they shall be in place whenever this type of container is stored regardless of the fill level of the container.

(f) The location of ASME containers shall comply with the "Aboveground Containers" column and the "Between Containers" column of Table 6.4.1.1 with respect to important buildings and lines of adjoining property that can be built upon.

(g) Where the provisions of (f) are impractical, alternative storage locations for containers shall be approved by the authority having jurisdiction.

The reason behind these requirements relates to fire safety and the hazards present when removing a tank from service. Not only can the tank still contain propane and therefore present a fire and a tampering hazard, the very process of emptying the tank involves a bulk propane truck to be sent to the site with trained drivers having the necessary tools, skills and techniques to perform the operation safely.

We request the Utah Public Service Commission take steps to enforce these requirements that assign responsibility to the natural gas utility for safely removing these consumer owned tanks from the site.

We thank you for your attention to this issue and are eager to work with you to develop a plan to adequately respond to this hazard.

Sincerely,

*Coy D. Porter*