29 October 2010

To: Interested Parties

Subject: Standards Council Decision (Final): D#10-23
Standards Council Agenda Item: SC#10-10-16
Date of Decision*: 29 October 2010
New Project: NFPA 56, Standard on Gas Process Safety

Dear Interested Parties:

At its meeting of 19-20 October 2010, the Standards Council considered the request to start a new project on the above referenced matter.

Attached is the final decision of the Standards Council on this matter.

Sincerely,

Amy Beasley Cronin
Secretary, NFPA Standards Council


*NOTE: Participants in NFPA’s codes and standards making process should know that limited review of this decision may be sought from the NFPA Board of Directors. For the rules describing the available review and the method for petitioning the Board for review, please consult section 1-7 of the NFPA Regulations Governing Committee Projects and the NFPA Regulations Governing Petitions to the Board of Directors from Decisions of the Standards Council. Notice of the intent to file such a petition must be submitted to the Clerk of the Board of Directors within 15 calendar days of the Date of Decision noted in the subject line of this letter.
At the Standards Council's August, 2010, meeting, the Council reviewed a report from NFPA staff concerning potential standards activities that might be undertaken in response to urgent safety recommendations issued by the U.S. Chemical Safety Board (CSB) regarding two serious explosion incidents.

As background, the CSB investigated two explosions in the past year in an industrial plant and at a nearly completed power plant. Though the explosions occurred in different industries, the practice of venting natural gas through piping and then releasing the gas into the atmosphere without proper control of the discharged flammable vapors has linked these two fatal incidents. At the conclusion of each of the investigations, the CSB issued urgent safety recommendations to various parties, including NFPA.

NFPA standards have already addressed one of these incidents, the ConAgra incident, through the issuance of a Tentative Interim Amendment to NFPA 54, National Fuel Gas Code, that addresses the issue of gas purging. The second incident, the Kleen Energy incident, involved “gas blowing,” a process for cleaning gas piping during the commissioning of new power plants. The report presented to the Council at its August meeting identified and discussed options available to the NFPA to address such fuel gas piping cleaning operations. One option was to expand the scope of NFPA 54 to address fuel gas piping cleaning. The second option was to address this subject as part of the overall subject of gas process safety by establishing a new technical committee to develop a new standard on gas process safety. The Council directed that a notice be published seeking input and comment on these options for the Council's consideration at its October, 2010, meeting (See Minute Item 10-8-38).

The Council has now reviewed and considered the entire record available to it including written input received in response to the public notice and a presentation at its October meeting from Manuel R. Gomez, Dr. P.H., MS, CIH, Director of Recommendations, U.S. Chemical Safety and Hazard Investigation Board (CSB). Based on this review, the Council has concluded that the best and most comprehensive approach to developing standards relating to gas blowing and more generally to gas process safety would be to establish a new technical committee to develop a new standard on gas process safety. The Council believes that this more general approach will help ensure that the subject of gas process safety receives more focused, consistent and comprehensive attention within the NFPA standards development process. This new standard, once developed, would be available for reference by other relevant NFPA standards as well as by the standards of
other organizations and regulatory bodies. In the Council's view, the CSB investigations and the record as a whole supports the conclusion that a standard for safety in gas process operations could serve to mitigate and help to avoid future holes in the regulatory safety net identified by the CSB in its criticism of the present patchwork of voluntary consensus standards and government regulation.

Accordingly, the Council has voted to establish a new NFPA Technical Committee to develop a new Standard on Gas Process Safety specifically dedicated to addressing safe practices associated with the array of gas process activities, including cleaning of gas piping, enriching the concentration within gas piping during commissioning (charging the line), and discharge of gas already in the system during gas purging or maintenance. The Council is directing staff to publish a call for committee members, and to solicit membership interest from stakeholders. The Council will review the proposed start-up roster and any proposed committee and standard scopes at its March, 2011, meeting. Given the importance and timeliness of this project, the Council may also, at that time, consider steps that might be taken to expedite the development of this standard.