

DEPARTMENT OF INDUSTRIAL RELATIONS
Division of Occupational Safety & Health
Pressure Vessel Unit
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Circular Letter PV-2007-1

Effective Date June 1, 2007

Subject: LP-Gas Systems in California

To: All Parties Involved in the Supply, Transportation, Delivery, Storage, and Handling of LP-Gas in Places of Employment

The State of California Division of Occupational Safety and Health (Division) exercises jurisdiction over and administers regulations for the design, construction, and installation of LP-Gas containers, including the storage and handling of LP-Gas. It is the intent of this circular letter to explain the Divisions' regulatory relationship with the LP-Gas industry for installations in places of employment.

Various sections of the California Code of Regulations Title 8 provide the rules and regulations for the use of LP-Gas. Section 450 has incorporated by reference the National Fire Protection Code (NFPA) 58, LP-Gas Code, 1998 Edition. NFPA 58 is supplemented by rules and regulations found in Title 8 Sections 470 through 494. Installations in places of employment are required to comply with both NFPA 58 and Title 8. This circular letter will attempt to clarify the additional Title 8 regulations.

The Division is an authority having jurisdiction. The employer is required to obtain written acceptance from the Division prior to installation for the following:

- An LP-Gas container installation of greater than 2000 gallons.
- Mounded or underground containers.
- Skid or trap tanks to be used more than 180 days at one location.
- Transportation tanks, or other tanks mounted on wheels, shall not be used in lieu of storage or skid tanks without acceptance of the Division. This acceptance is for temporary use only and shall not exceed 180 days.
- The use of un-odorized LP-Gas.

Permits to operate LP-Gas in a place of employment are issued by the Division after an inspection has been performed by a Division or an appropriate insurance company qualified inspector. The permits are issued as follows:

- A three (3) year permit is issued for dispensing, trap, and skid tanks.
- A five (5) year permit is issued for transportation, mobile fuel, and storage tanks.
- Permits are valid for a specific tank at a specific location. If the tank is replaced, the permit is invalid.



- It is intended that failure to maintain the installation in compliance with these orders shall be justification to void the permit and require reinspection.
- Permits are invalid if alterations are made that affect the safety of the installation or if the tank has suffered mechanical or fire damage.
- No person shall fill an LP-Gas tank unless the tank has a posted valid permit to operate.

LP-Gas tanks are sometimes used for products other than LP-Gas (e.g. anhydrous ammonia). When the tank is switched back to LP-Gas service, an internal inspection by a Division or qualified insurance inspector shall be performed prior to the issuance of a permit to operate.

Any welded repairs made to an LP-Gas container shall be performed in accordance with the National Board Inspection Code (NBIC) by a National Board 'R' stamp holder or applicable American Society of Mechanical Engineers (ASME) stamp holder. Welded repairs shall be authorized by a Division or a qualified insurance inspector.

Copies of Title 8 Chapter 4 Subchapter 1 Unfired Pressure Vessel Safety Orders may be obtained through Barclays Law Publishers at (800) 888-3600 or on the internet at <http://www.dir.ca.gov/Title8/sub1.html> . NFPA 58 may be obtained by calling NFPA at (800) 344-3555.

Feel free to contact any of our inspectors concerning the requirements of Title 8. We prefer to discuss any issues you might have prior to installation to minimize having a location not be in compliance.

Sincerely,

Original signed by Donald C. Cook

Donald C. Cook
Principal Safety Engineer