



South Carolina Department of Labor, Licensing and Regulation

South Carolina Building Codes Council

P.O. Box 11329 • Columbia, SC 29211
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www.llr.sc.gov/POL/BCC/



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Request for Statewide Code Modification

Jurisdiction or Organization: South Carolina Propane Gas Association

Representative: J. M. Clark, Jr. **Title:** Executive Director

Address: 2 Lehigh Court – Columbia, SC 29223

Phone: 803-865-2284 **E-mail:** scpga@sc.rr.com

Signature:  **Date:** March 31, 2015

Code: International Fuel Gas Code **Edition:** 2015 **Section:** 401.10

Check One: Delete and substitute the following Delete without substitution Add the following Modify the following
Type or print proposed modification. Use additional pages if necessary. Underline New language. Line Through Deleted Language.

401.10 Third-party testing and certification. Piping, tubing and fittings shall comply with the applicable referenced standards, specifications and performance criteria of this code, ~~and shall be identified in accordance with Section 401.9. Piping, tubing and fittings shall either be tested by an approved third party testing agency or certified by an approved third party certification agency.~~ including Section 403 of the IFGC and corresponding sections.

Reason: Unusually Restrictive Impractical Threat to Human Injury or Life Safety
Type or print the reason for the proposed modification. Use additional pages if necessary.

The above modification was submitted and approved for the 2012 IFGC. It is being resubmitted due to two (2) minor word changes by the ICC for the 2015 code. The word changes appear to be of little consequence, but since there was a change by the ICC we understand this necessitates a resubmittal.

The piping industry has never been required to employ a third party to test and certify its products. This requirement was new in the 2012 International Fuel Gas Code and has far ranging impact that wasn't anticipated at the code development hearings. In many cases, there are no certifications or testing requirements to use for flare nuts, tees, pipe nipples, etc. This requirement is extremely onerous to the fuel gas industry and offers very little, if any, protection to the health, welfare, and safety of the public and persons using these materials. Piping, tubing and fittings are fabricated to various materials standards, such as those published by the American Society for Testing and Materials (ASTM) and the American Society of Mechanical Engineers (ASME). All of the material standards are shown in Section 403 of the IFGC.



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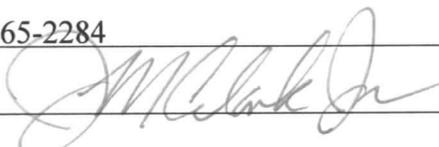
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Signature:  **Date:** March 31, 2015

Code: International Fuel Gas Code **Edition:** 2015 **Section:** 621.4

Check One: Delete and substitute the following Delete without substitution Add the following Modify the following
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621.4 Prohibited locations. Unvented room heaters ~~shall not~~ may be installed within occupancies in Groups A, E and I-, except for residential board and care and health care occupancies as listed in NFPA 54 Section 10.23.3.
The location of unvented room heaters shall comply with Section 303.3.

Reason: Unusually Restrictive Impractical Threat to Human Injury or Life Safety
Type or print the reason for the proposed modification. Use additional pages if necessary.

Unvented room heaters have been installed in the IFGC listed restricted occupancies by the propane industry in South Carolina for 50+ years in accordance with NFPA 54. The oxygen depletion sensors (ODS) and safety pilots on currently manufactured room heaters ensure the heaters' proper operation and eliminate the threat of carbon monoxide. Occupant density and room volume are taken into account when sizing a room heater to ensure proper operation. Unvented room heaters should not pose any greater risk to occupants than vented heaters which are allowed in Occupancy Groups A, E and I. This modification will bring the IFGC in harmony with NFPA 54.