

**SB175: Public Safety – Corrugated Stainless Steel Tubing for Fuel Gas Piping Systems – Requirements and Prohibitions**

**Sponsors: Senators Karen Lewis Young, Benjamin Brooks**

**Hearing: Environment & Transportation Committee, March 25, 2025, 1:00PM**

**Position: FAVORABLE**

**Testimony on Behalf of Omega Flex, Inc.**

Omega Flex, Inc. (OmegaFlex) was established in 1975 and is a leading innovator and a U.S. based manufacturer of flexible metal hose and piping products. Typical applications for its products include flexible piping for fuel gases in residential and commercial construction, semi rigid piping for liquid fuels for automotive, marina and back-up generation, flexible tubing for medical gases in healthcare facilities, and flexible hoses for various industrial applications requiring a high degree of flexibility with the ability to carry corrosive substances at cryogenic or very high temperatures.

Corrugated Stainless Steel Tubing (CSST) is a flexible gas piping system that was developed in Japan in the 1980's as a superior alternative to black iron pipe, which has failed with deadly consequences during earthquakes and other natural disasters. CSST began being used in the United States in the 1990's and is now used throughout North America with over 1.5 billion feet installed.

SB175 includes two amendments that are not a part of the companion HB222 which was passed by this Committee.

- 1.) The first amendment is on Page 2, Lines 8 and 20 and replaces the words “non-arc resistant” with “non-conductive” jacketed corrugated stainless-steel tubing.

The purpose of this revision is to replace the use of the term “non-arc-resistant jacketed” which is in the underlying law passed in 2022. The original intent of the 2022 language was to prohibit the use of yellow jacketed CSST. However, both yellow and black jacketed CSST have some level of arc resistance as shown by several technical studies.

Yellow jacketed CSST is dielectric (or an electric insulator) with an arc resistance strength ranging between 25,000 -40,000 volts.

Black jacketed CSST has an arc resistance strength of 50,000+ volts and higher and is designed to conduct the energy while dissipating it as it moves through the cross section of the jacket. Yellow jacketed CSST does not have conductive properties. The EEE amendment will clearly designate the prohibition of yellow jacketed CSST in Maryland.

The 2022 legislation also created a conflict between legislative language and the MD Plumbing Code. The 2022 language creates an erroneous perception that yellow jacketed CSST is prohibited, which it is not since yellow jacketed CSST has arc resistant to some degree. The 2022 legislation makes no reference to any governing standards or minimum level of arc resistance required.

- 2.) The second amendment is on Page 3, Lines 4 and 8 and makes the Department of Labor the lead entity for the Study with consultation from the State Fire Marshal. This reverses the order as passed by the House.

The purpose of this revision is to place a neutral arbiter in the lead position for the Study. Professional organizations representing the fire community have been active proponents for the adoption of more restrictive language which would only allow CSST meeting the LC-1027 testing criteria. The Maryland Chapter of the International Association of Fire Marshals has submitted written testimony in support of LC-1027. Additionally, the National Association of State Fire Marshals as well as the Office of the State Fire Marshal of Maryland have publicly supported efforts to implement LC-1027.

Below is a table highlighting the difference between yellow and black jacketed CSST.

|                      | Howard County Incident CSST Involved July 23, 2018 | Frederick County Incident CSST Involved August 11, 2021 | Level of Arc Resistance | Conductive Property |
|----------------------|--|---|-------------------------|---------------------|
| Yellow Jacketed CSST | YES  | YES   | YES<br>25,000 Volts     | NO                  |
| Black Jacketed CSST  | NO   | NO  | YES<br>50,000+ Volts    | YES                 |

Omega Flex, Inc. requests your support for a **FAVORABLE** report for SB175 as passed by the Senate.

*For questions or additional information, please contact Jamie Gregory at [jgregory@lhstrategy.com](mailto:jgregory@lhstrategy.com) or 202-841-3567.*