

**Senate Bill 175 – Public Safety – Fuel Gas Piping Systems and Corrugated Stainless Steel Tubing – Prohibitions and Study****Position: Favorable with Amendment**

On behalf of Ward Manufacturing, the manufacturer of WardflexMAX corrugated stainless steel tubing (CSST), **we request a favorable report on SB 175** with an amendment to include a manufacturers' representatives. As introduced, SB 175 proposed to mandate one manufacturer's proprietary product listing criteria (ICC ES PMG LC1027) in place of the national consensus standard (CSA ANSI LC 1:2023) for CSST.

CSST became a standard product in the building industry as an earthquake resistant alternative to the more common black iron pipe used at the time. The LC 1 standard was developed to ensure strict testing and performance requirements for arc-resistant CSST jackets to provide a high degree of resistance to electrical arcing caused by lightning. This is why the National Fuel Gas Code and the International Fuel Gas Code only recognize the use of CSST in accordance with the LC 1 standard.

ASC prefers the language in the House passed version of SB 175 which adds manufacturers of the fuel gas piping to the study. However, ASC supports the Senate language which directs the Department of Labor -- which is the Agency housing the Maryland Building Codes Administration -- to conduct the study of CSST in conjunction with the State Fire Marshal. The House legislation directed the State Fire Marshall to conduct the study even though the LC 1 standard is a building code standard.

Importantly, the Department of Labor has not taken a position on the legislation while the professional organizations representing Fire Marshals have advocated for the LC-1027 standard. The Department of Labor is a neutral party with important expertise in this matter and should conduct the study with collaboration from the Fire Marshal.

Respectfully submitted,

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**Amendment to Senate Bill 175  
(Third Reader)**

On page 3, line 33, strike “and”

On page 4, strike line 1 and insert:

“(iii) manufacturers of fuel gas piping systems and corrugated stainless steel tubing; and  
(iv) any other necessary subject matter experts.”