



Career Fire Fighters Association of Frederick County, MD Inc.

International Association of Fire Fighters Local 3666

Affiliated with:

Maryland State Professional Fire Fighters Association and The Central Maryland Labor Council / AFL-CIO



March 16, 2022

Dear Chairman Barve,

I write as the President of the Career Firefighters Association of Frederick County, Maryland - Frederick County's public employee organization that represents the over 500 men and women employed with the Frederick County Division of Fire and Rescue. We are grateful that your Committee has stepped forward to address the danger related to yellow CSST. The deadly combination of yellow CSST and lightning strikes are attributed to the fires that led to the Line of Duty Deaths for Nathan Flynn in Howard County and our own Josh Laird in Frederick County. HB1052 - Public Safety – Gas Piping Systems – Construction Requirements (Flynn and Laird Act) was a step in the right direction as introduced and we are grateful to our sponsors, Delegate Holmes and Stein.

However, **we are voicing our opposition to the last minute amendment language** offered by Mr. Gregory, representing Omega Flex, and industry representatives that seek to preserve the status quo and their market share. This language, in effect, “guts the bill”. This language was ostensibly provided for the first time on Wednesday, March 16th and had not previously been shared with us.

The amendment prescribes that the product be “listed”. This means that it is a product that has met the testing standards of ANSI LC-1 which is a “standard” created when corrugated stainless steel tubing, or “yellow CSST” came into the market. As Mr. Gregory offered in the Subcommittee, this standard deals with bending angles, corrosion and other factors. Notably, these factors are all unrelated to the problem we are trying to fix which is safety related to electricity/lightning. In fact, the standard offered by Mr. Gregory was actually crafted by the industry. Mr. Gregory also referenced the Canadian Standards Association or “CSA”. This is the Canadian equivalent of Underwriters Laboratories and less stringent.

In practical terms, adding “listed” releases the manufacturers from liability, as all of these CSST products are “listed” under their proffered standard.

Our research has shown that Omega Flex no longer even sells this product.

Public safety personnel are at the front lines of the current health crisis, constantly exposed to contagion in ways few others are. We also, however, face exposure to carcinogens and other toxic substances that lead us to have unique healthcare needs. Now, we must advocate for additional consumer protections as this dangerous material is revealed. Line of duty deaths are painful reminders of the sacrifice our members have made for the safety of Marylanders and we truly appreciate your work on this important issue.



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We are proud to serve every day and in advance, thank you for taking the time to share this with your colleagues as you consider industry amendments to HB1052 before the full Committee. Please contact me or Katie Nash (Katie@fiastroconsulting.com/301.524.9142) with any questions.

Respectfully Yours,

Stephen Jones
President of Local 3666, Frederick County Career Firefighters

Cc: Members of the Environment and Transportation Committee
Mr. Matt Mickler
Maryland Professional Firefighters Association
County Executive Jan Gardner
Frederick County Division of Fire and Rescue Services Chief Tom Coe
Career Fire Fighters Association of Frederick County, MD IAFF Local 3666 Executive Board