



Manufacturer of Flexible Metal Hose and Gas Piping Products

Written Testimony in Support of HB 1052

My name is Robert Torbin and I am the Director of Codes and Standards for Omega Flex Inc. of Exton, PA. Omega Flex is a manufacturer of corrugated stainless steel tubing products including its TracPipe CounterStrike CSST. I am also the Chair of the CSA LC-1 Technical Subcommittee which is responsible for developing and maintaining the listing standard for CSST. I am a Registered Professional Engineer in the Commonwealth of Massachusetts where I have been practicing engineering for 50 years. I speak in support of HB 1052 but with modifications.

CSST has been commercially sold in the United States for over 30 years with more than 1.5 billion feet installed. It is listed to the national consensus standard CSA LC-1 by three different third-party agencies included CSA Group, the ICC Evaluation Services and the IAPMO Uniform Evaluation Services. Modifications to this standard were made in 2014 that recognizes a special function jacket that is highly resistant to electrical arcing induced by lightning strikes. The inclusion of this arc-resistant jacket as part of the listed CSST system is optional, and some CSST manufacturers do not offer this feature.

The proposed and amended verbiage in the bill describing the permissible type of CSST is confusing and easily misconstrued by a knowledgeable installer. All CSST jackets (both the standard yellow and the newer black jackets) have some level of arc resistance. All CSST can be made more resilient against electrical arcing by simply bonding the tubing to the electrical grounding system. It is, therefore, important that the language in House Bill 1052 accurately reflects the intent of the author and the standard to avoid any misunderstanding or confusion within the installer and inspection communities.

I respectfully offer that following revisions and modifications for your review and acceptance:

(3) CSST means corrugated stainless steel tubing

(B) This section applies to residential and commercial buildings that use gas piping systems not subject to 49 CFR 192.

(C) When installing CSST, only CSST with an arc-resistance jacket listed in accordance with Section 5.16 of CSA LC-1-2019 shall be used in the new construction of a customer-owned natural or propane gas piping system in a new residential or commercial building.

(D) Any modification greater than 50% of the total square footage of the structure that results in the replacement of an existing gas line or addition of a new gas line to the existing system must be in compliance with Item C above when installing CSST

(E) All other CSST requirements of the Maryland State Plumbing and Gasfitting Code shall remain unchanged.

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