



Manufacturer of Flexible Metal Hose and Gas Piping Products

Written Testimony on HB 1052 – Senate Finance Committee

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 the following revisions and modifications for your review and acceptance:

On Page 2, line 14, insert a new (B) and move existing language to (C):

(B) WHERE CORRUGATED STAINLESS-STEEL TUBING (CSST) IS INSTALLED, ONLY CSST WITH AN ARC-RESISTANT JACKET LISTED IN ACCORDANCE WITH ANSI LC-1/CSA 6.26 MAY BE USED IN:

The suggested amendment will ensure that CSST used going forward will meet or exceed accepted industry standards for arc-resistance as set by the American National Standards Institute, Inc. (ANSI) and the CSA Group (Canadian Standards Association). The amendment will clarify the language in the House passed bill that references non-arc resistant CSST without defining the term. As written, the House bill would require the installer and the local Authority having jurisdiction to determine what is sufficient arc resistance. Section 5.16 of LC-1 provides the test and acceptance criteria for arc resistant CSST.

Omega Flex supports HB1052 with the adoption of the suggested amendment.

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