

HB222: Public Safety – Corrugated Stainless-Steel Tubing for Fuel Gas Piping Systems – Requirements and Prohibitions.

Environment & Transportation Committee – January 28, 2025

Sponsor: Delegate Dana Stein

Position: UNFAVORABLE

Testimony on behalf of Omega Flex, Inc.

- HB222 as introduced will require that only corrugated stainless steel tubing that meets the LC-1027 standard or attains 36 Coulombs resistance may be used in new construction or renovated properties.
- LC-1027 is a testing criterion that was created for one patented product, FlashShield made by Titeflex Corporation, Gastite division. FlashShield is the only CSST product on the market that meets the LC-1027 criteria because the listing criteria was written based only on its capabilities. If this legislation passes, FlashShield will be the only product available in Maryland.
- Recognized Atmospheric Physicist Michael Stringfellow, an expert in lightening and grounding, stated in his 2017 report, *Critical Review of LC-1027 Listing Criteria for Multi-Layer Conductive, Jacketed Corrugated Stainless-Steel Tubing*, “the LC-1027 listing appears to have chosen test criteria to suit the particular product for which it was developed.”
- Since 2014, the gas industry has studied LC-1027 as a replacement standard for arc resistant CSST and it was considered by both the CSA Group as an alternate national standard and by the National Fire Protection Association for recognition in the national fuel gas code. Both times LC-1027 was rejected.
- The LC-1027 testing criteria has been discussed and considered in communities and legislatures across the country. No jurisdiction in the country has implemented LC-1027.

Legislative History

- During the 2022 MGA Session, HB1052 was adopted and signed into law that states “non-arc resistant jacketed corrugated stainless-steel tubing may not be used” in new construction or renovated property.
- The Senate Finance Committee considered an amendment to add LC-1027 and decided not to include it.
- The 2022 Joint Chairmen’s Report requested a report from the Public Service Commission concerning the potential creation of a consumer website to educate the public about potential safety risks of improperly installed yellow CSST as well as consumer protections such as replacement, signage to alert first responders of its presence, and the need for proper grounding or bonding of the piping.
- During the 2024 Session, HB503 was introduced to again attempt to require CSST to meet the LC-1027 threshold in Maryland. The HRP Subcommittee discussed the bill during multiple work sessions and ultimately did not move the bill forward.
- For the 2025 Session, HB222 has been introduced that would again attempt to directly implement LC-1027 or indirectly by requiring 36 Coulombs of resistance.
- Either way, this is an attempt to circumvent the development requirements of national consensus standards and codes by recognized Standards Development Organizations and if passed will reduce safety by weakening that process.

For any questions or more information regarding Omega Flex’s position, please contact Jamie Gregory at jgregory@lhstrategy.com or 202-841-3567.