

TGPL/Comm/2020-21/005

May 11, 2020

To,  
The Secretary,  
Petroleum and Natural Gas Regulatory Board (“PNGRB/ Board”),  
1<sup>st</sup> Floor, World Trade Centre,  
Babar Road, New Delhi — 110001

Sub.: Comments on Amendments in the PNGRB ((Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) Regulations, 2010.

Ref.: 1) Public Notices dated 17.02.2020 and 12.03.2020  
2) Amendments in the PNGRB ((Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) Regulations, 2010  
3) PNGRB (Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) Amendment Regulations, 2020.

Dear Madam,

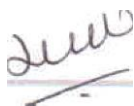
This is with reference to the abovementioned Public Notices web-hosted by Honourable Board seeking views from stakeholders on the proposed amendments in the PNGRB (Codes of Practices for Emergency Response and Disaster Management Plan (ERDMI<sup>o</sup>)) Regulations, 2010.

In this regard, we would like to submit the views of Torrent Gas Private Limited (TGPL) as under for the kind consideration of Hon’ble Board.

1. Amendments in the PNGRB (Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) Regulations, 2010

1.1 Sr. No. 9. Clause No. 3 d) of Proposed Amendment:

The Hon’ble Board may consider addition of LPG Storage facilities including LPG Plants along with Natural gas storage facilities including LNG terminals.



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1.3 can be executed by the Board and the Director. GAS

- a) "the Hon'ble Board may consider simplifying MSDS format for understanding of the common people.
- b) Provision for antidote of chemicals may be considered for addition in the MSDS format.

1.4 Annexure -2: Emergency Response Plan during Projects Construction

- a) The Hon'ble Board may consider providing a comprehensive list of Statutory requirements related to CGD projects as there is an ambiguity about the applicability of these requirements.
- b) Fire protection system (Active and Passive) should be specifically mentioned for CGD business as it is very difficult to persuade the State Fire authorities or any other authorities on this subject.

1.5 Annexure-3: Typical Mock Drill Reorganization Format

- a) The Hon'ble Board may consider providing business specific mock drill formats i.e. different formats for Natural Gas Pipelines, Petroleum and Petroleum Product Pipelines and CGD Network etc. For example, Headcount part is practically very difficult in city if there is any problem in MDPE/ CNC Station.
- b) The Hon'ble Board may ensure that list of emergency equipment with owners address and contact details should be available in District Disaster Centre for immediate utilisation in case of requirement.

2. PNGRB (Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) Amendment Regulations, 2020.

2.1 Regulation 24.2

The proposed amendment at Regulation 24.2 provides that an entity shall submit the enquiry committee report of all major incidents to the Board within 30 days of the incident. We would like to humbly submit that the Hon'ble Board may consider modifying the same to 'within 60 days' as most of the times there will be a need to perform chemical analysis of the failed materials which takes considerable time besides other factors.

2.2 Regulation 24.3

The Hon'ble Board may consider addition of 'Series of Explosions / blasts resulting in Catastrophe' in the list of major incidents to be investigated by an

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enquiry committee constituted by the Board as well as modifying the sub-clause b as “Fires involving fatality or/and Property Damage exceeding Rs. 25 lakhs or/ and evacuation of more than 25 Persons”.

### 2.3 Regulation 24.4

The Hon’ble Board may consider deletion of addition of sub-clause d i.e. fixing responsibility in the terms of reference for enquiry committee for incident investigation as it may lead to hiding of information and tampering of evidences etc affecting the investigation.

### 2.4 Regulation 24.5

In light of explanations provided in Sr. No. 2.1 above, the Board may like to accordingly reword Regulation 24.5 as below:

“The enquiry committee shall submit the preliminary report within 15 days and final report to the Board within 60 days of constitution.

## 3. General Comments.

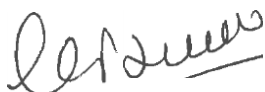
3.1 The Hon’ble Board may clarify the implementation schedule for ERDMP for new Geographical Areas (GAs). Further, it is suggested that there may be some time gap between the implementation and certification/validation etc.

3.2 It is suggested that the requirements specified in PNGRB ERDMP Regulations may be brought in sync with the requirements of OISD / Other local authorities requirements to avoid conflicts, for example OISD standards require Fire Hydrant system to be in place for CGD entities whereas ERDMP regulation is silent on the same.

We trust the Hon’ble Board finds our views helpful in framing the regulations and would be happy to provide any further clarifications should they be required by Hon’ble Board.

Thanking you.

For Torrent Gas Private Limited



Utkarsh Bhatt

Vice President (Commercial)