



May 11, 2020

To
The Secretary,
Petroleum & Natural Gas Regulatory Board,
1st Floor, World Trade Centre,
Babar Road,
New Delhi – 110001

Subject : Comments on Draft amendments on "PNGRB (Technical Standards and Specifications including Safety Standards for Retail Outlets dispensing Petroleum, Auto LPG and CNG) Regulations, 2018".

Ref. : PNGRB Public Notice dated 17.02.2020, 02.03.2020, 01.05.2020 and 05.05.2020 regarding the abovementioned amendments

Dear Madam,

With reference to the abovementioned subject and referred public notices of PNGRB, comments on the draft regulations are enclosed herewith as **Annexure 1**.

This is for your favorable consideration please.

Yours sincerely,
For Adani Gas Ltd.

K. D. Rawal
(Authorized Signatory)



Encl: As above

Adani Gas Limited
Heritage Building, 8th floor,
Ashram Road, Usmanpura,
Ahmedabad-380014
Gujarat, India
CIN: U40100GJ2005PLC046553

Tel +91 79 2754 1988
Fax +91 79 2754 2988
info@adani.com
www.adani.com

Registered Office: Adani House, Nr Mithakhali Circle, Navrangpura, Ahmedabad 380 009, Gujarat, India

Clause-wise Comments on the Draft Regulations on Technical Standards and Specifications including Safety Standards for Retail Outlets dispensing Petroleum, Auto LPG and CNG, Regulations 2018

General comments:

1. Some of the proposed clauses conflict with extant PESO regulations which will lead to further land use issues for existing CGD operators.
2. As per the guidelines for authorization by MOPNG for the Bulk and Retail marketing, the authorized entity is required to create at least one new generation alternate fuels like CNG / LNG.
3. It is also submitted that the proposed rules will make LNG / LCNG plot very big which are very difficult to develop. Further, due to this requirement, the use of current plots for multi fuels (HSD & MS) along with LNG / LCNG will become a further challenge.

Clause Specific Comments:

1. Regulation 7 – Compliance to these Regulations:

Comments:

- Board has proposed that entity should appoint one of its directors, within 90 days of these regulations coming into force, to be responsible for compliance to these regulations.
- It is submitted that almost all the authorized entities have an internal control system and suitable governance framework in place commensurate with its size and complexity of its operations.
- Therefore, instead of appointing one of the directors as proposed, it is suggested that PNGRB may consider to include appointment of a senior management personnel designated as person responsible for the compliance of these regulations or appointment of a KMP as defined under Companies Act or one of the Director as may be decided by the Board of Company.

Given below are comments on the Schedule 4

2. Clause 1.0 – Scope:

Comments:

- It does not cover the certification or fitness requirements of vehicles.

- It is requested to clarify under in which standard it will be covered.

3. Clause 3.0 – Storage Installations and Handling

Comments:

- Table 3-Point no. 4 – Please clarify the requirement of CNG Cascade (For LCNG Station). The safety distance as per Table I A of Gas Cylinders Rules, 2016 from edge of the dyke. The cascade shall be segregated from LNG facility by providing concrete wall up to the height of the cascade.
- 3.0(6) – Please clarify the Distance of odorization unit from vessel.
- 3.0(6) – It is suggested to incorporate the safety precautions need to be taken for odorization unit and safety measures related storage of methyl mercaptan.
- 3.0(16) – Please clarify electrical earthing should be individual or in grid. Further, please clarify earthing for instrument as required.

4. Clause 4.0 - LNG Storage Vessel - General design requirements

Comments:

- 4.0 (1) (a) – It is requested to clarify for the physical property of the soil, what are the parameters for checking the physical property of the soil.

5. Clause 5.0 – Fitments

Comments:

- 5.0 (3) – Please clarify what will be the arrangement for drainage of SRV to prevent accumulation of water.

6. Clause 7.0 – Piping System

Comments:

- 7.0 (5) – Please clarify how will we be taken tapping for thermal relief valve.

7. Clause 10.0 – Tank Vehicle Unloading Facilities

Comments:

- The following safety precaution can be mentioned on during unloading
 - The provision for earthing during unloading of vehicles.

- Specific SOP is required for LNG process & always available at installation.
- The arrangement if there is spillage of LNG i.e. spill kit & sand bucket etc.
- The requirement of special PPEs for LNG unloading process.
- The requirement of personal earth monitor for operator during unloading of vehicles.
- The requirement of Spark arrestor & wheel chock in the vehicles.

8. Clause 12.0 - Fire Protection Facilities

Comments:

- 12.0 – Please clarify the Number of gas detector & flame detector is required for one installation.

9. Clause 14.0 – LNG or LCNG Dispensing

Comments:

- 14.0(1) – Please clarify further details about damage protection of dispensing unit, safety guard, height of dispensing unit etc.
- 14.0(3) – Please clarify further about illumination level for installation & IP-65 rated electrical lighting.

10. Clause 16.0 – Road Transportation

Comments:

- 16.0 (c) (9) – please clarify what will be the height of vent pipe.

11. Clause 17.0 – Competence Assessment and Assurance

Comments:

- 17.3 – Please specify requirement of any third party certification of safety training for driver & operators.

12. Clause 18.0 – Emergency Plan and Procedure

Comments:

- 18.0 – For frostbite / cold burn related first aid kit arrangement can be added.

13. Clause 20.0 – Safety Inspections/ Audit

Comments:

- 20.0 – Please clarify the competency requirement for authorized person. Can he/she be from the operating company or required to be approved 3rd party by PNGRB?
- 20.0 – Please clarify yearly inspection can be done internally competent person or by third party.
- 20.0 – Details of schedule 1 is missing the document.

14. Other Clarification

Comments:

- Please clarify if any requirement for HAZOP study & QRA study for the installation as required for other CNG and CGS.
- The requirement of Windssock in the installation can be added.
- Installation Commissioning & construction related guidelines can also be added as pre-startup safety review point of view.

15. Table 1 – Distances from Impound Wall and Property Line:

Comments:

- Provisions of the table conflicts with PESO SMPV Rules, as SMPV Rules allows 8 m from impoundment wall for up to 56.8 m³ Storage tank.
- Also, the following note conflicts with Table-1 of the SMPV Rules. Table -1 of SMPV provides distances based on the capacity of the individual tank (largest tank/vessel) and not on the aggregate capacity of multiple tanks installed in the LNG Station.

"NOTE: If the aggregate water capacity of a multiple container installation is 1.9 m³ or greater, the minimum distance must comply with the appropriate portion of this table, applying the capacity rather than the capacity per container, If more than one installation is made, each installation must be separated from any other installation by at least 7.6 m. Do not apply minimum distances between adjacent containers to such installation."

- If this needs to be applied, then the entity will need to leave 30 M safety distance between the boundary/fence line and the dyke wall for all stations where there will be provision kept for 300 KL (100 kl x 2 + 1 for future expansion) capacity.
- If PNGRB wants to restrict the size of LCNG stations which would be beneficial to all entities, PNGRB they should limit to 1060 m³ storage as per SMPV Rules.

16. Table 4 – Minimum Distances (Sl. No. A.1):

Comments:

- The table specifies inter distance of 6 m between Auto LNG / LCNG Dispenser & Property line while OISD 179 in Table II, it is 4 m between CNG dispenser and property line.
- It should be 4 m for both CNG (LCNG) and LNG Dispensers.

17. Table 4 – Minimum Distances (Sl. No. B.1):

Comments:

- The table specifies inter distance of 9 m between MS/HSD fill point / Vent and Auto LNG/ LCNG Dispenser while OISD 179 in Table II, it is 4 m (min 3 m) between CNG Dispenser and MS/HSD fill point/ Vent.
- It should be 4 m for both CNG (LCNG) and LNG Dispensers.

18. Foot note of Table-4:

Comments:

- The foot note is reproduced as follows for ready reference.
"NOTE: NON FUELING FACILITIES AT LNG OR LCNG STATIONS - Non fueling facilities like small convenience stores, service station, ATM, PCO, whenever provided, shall be beyond safety distance mentioned in this schedule. In addition a minimum distance of 10 meter from the LNG/LCNG dispensers shall be maintained. The accessibility to such non fuelling facilities shall not be through operational area. While providing such facilities, factors like degree of congestion in the premises, easy entry and exit of the vehicle coming for refueling and easy maneuverability of LNG road tanker while moving out of the premises in the event of emergency shall also be taken into consideration".
- It is submitted that these guidelines virtually will not allow any co-location with existing MS/HSD/CNG dispensing stations in the country and will discourage commercial activities on the LCNG stations.



- In our view this will greatly impact the economic viability of LNG as commercial vehicle fuel.
- Hence, it is suggested to remove the proposed foot note.

Adani Gas Limited
Heritage Building, 8th floor,
Ashram Road, Usmanpura,
Ahmedabad-380014
Gujarat, India
CIN: U40100GJ2005PLC046553

Tel +91 79 2754 1988
Fax +91 79 2754 2988
info@adani.com
www.adani.com

Registered Office: Adani House, Nr Mithakhali Circle, Navrangpura, Ahmedabad 380 009, Gujarat, India