

IOCL Comments on “The Petroleum and Natural Gas Regulatory Board (Technical Standards and Specifications including Safety Standards for Retail Outlets dispensing Petroleum, Auto LPG, CNG, LNG and LCNG) Regulations, 2018” are as below:

S. No	Clause No.	IOCL Comments		
		Proposed Clause	Whether acceptable or not	Remarks
1	Annexure-A (iii)	Modify the short title of the Regulations as “the Petroleum and Natural Gas Regulatory Board (Technical Standards and Specifications including Safety Standards for Retail Outlets dispensing Petroleum, Auto LPG, CNG, LNG and LCNG).	Acceptable with change	The short title shall be termed as “The Petroleum and Natural Gas Regulatory Board (Technical Standards and Specifications including Safety Standards for Retail Outlets dispensing Petroleum, Auto LPG, CNG, LNG and LCNG) Regulations, 2018”
2	1.0	This technical standard and specifications including safety standards lays down the minimum requirements in design, operation, inspection, maintenance, training, and consumer safety at Retail Outlets dispensing LNG/LCNG with above ground LNG storage. It does not cover the certification or fitness requirements of vehicles.	Acceptable with change	Storage and transportation should be added in part of the clause. The part of clause shall be written as “This technical standard and specifications including safety standards lays down the minimum requirements in design, storage, transportation, operation, inspection, maintenance, training, consumer safety at Retail Outlets dispensing LNG/LCNG with above ground LNG storage. It does not cover the certification or fitness requirements of vehicles.”
3	Clause 3.0	Sub Clause No. under the clause	Correction required	1. The sub clause numbering is not correct. Proper numbering to be done.
4	3.1 (1) (a) table 1		Correction Required	1. The Sr. No. under table are not correct and S. NO. 4 & 5 are missing in table. 2. Some text is hidden in the third column for existing Sr. No. 9.
5	3.1 (1) (a) table 1 and note, below table 1	Notes : 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.	Not Acceptable	This Regulation in not in line with SMPV Rules 2016. To be reviewed, to avoid confusion.
6	Table 2	1. The heading of Column under column 3 read as “Inner edge of the dyke wall and outer shell of the storage vessel or D/2 (whichever is higher)”. The heading is not clear.	Need to be rephrased	1. The heading should be rephrased as “Distance between Inner edge of the dyke wall and outer shell of the storage vessel (As per below or D/2 of vessel (whichever is higher))

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		2. Sr. No. 5 and 6 under table 2.		2. The letter “D” is not defined in the regulation. Should be defined to avoid confusion. 3. It appears that division into Sr. No. 5. and 6 is not required. S. NO. 5 can provide details for category “Above 114.0 but not above 379.0, as the distance norms are same.
7	Table -3	Column 3 of S. NO. 2 of the table states “Min. 4.0 m and min 9.0 m from the adjoining property. The fill point shall also observe minimum 9.0 meter safety distance to the adjoining property.”	Not acceptable and need to be modified	1. The content is not clear and probably need to be rephrased as “Min 4 meter” , 2. Distances of truck unloading platform to other facilities should be provided separately to avoid confusion.
8	After table-3	The above facilities can be either standalone or co-located. The minimum distance between dispenser, fill point, impounding/ dyke wall, vent etc. shall be as per Table -4 below:	Need to be corrected	The clause is not connected to the above table/text. Clause “the above facilities” does not clarify which facilities.
9	Clause 3.1 (9)	The height of the impoundment wall shall be adequate to contain spillage of LNG. Dyke wall height should be between 0.6 meter to 1 meter from the dyke floor level.	Not acceptable	In contradiction to SMPV regulation clause No. Schedule IV A (6). Which states “The height of the impoundment wall shall be adequate to contain spillage of any LNG. A minimum height of 1 m. is recommended for the impoundment/dyke wall.” To be reviewed.
10	Clause 3.0 para after sub clause (23)	Typical layouts of auto LNG / LCNG Station with provision of mobile cascade filling and PNG and auto LNG / LCNG dispensing Station co-located with Petroleum (MS, HSD) Retail outlet provided in Figure – I and Figure – II respectively.	Acceptable with correction	Sentence need to be rephrased to properly connect the sentence to the two figures, Figure-i and Figure –II.
11	6.0	Pump and compressor employed in LNG source shall be provided with a pressure relieving device on the discharge to limit the pressure to the maximum safe working pressure of the casing and downstream pipings and equipment.	Acceptable, Addition suggested	Tripping of compressor in case of high values as suggested by OEM is to be included.
12	14.0 (B)(1)(a)	The dispenser shall be protected damage due to vehicle collision.	Acceptable with change	Word from to be added and sentence to be rephrased as “The dispenser shall be protected from damage due to vehicle collision.”
13	14.0(B)	B(1) (b) and (c)	Not acceptable and to be removed	B(1)(b) and (c) are covered under B (3)
14	15.0	Operation, Maintenance and Training	Phrase “and	The training is covered separately under Clause 17.0 “

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			training” to be removed	Competence Assessment and Assurance” and not covered in this clause
15	16 (F)	Subclauses (1) to (5)	Acceptable with correction	<ol style="list-style-type: none"> 1. The Subclauses are not clear and there is lot of repetition, creating confusion about number of valves required and also about means of their control. 2. The Subclauses may be suitably rephrased, clearly indicating the number and type of valves required, their position with respect to vehicle and means of control and closure.
16	17.0	Competence Assessment and Assurance	Acceptable with correction	The word ‘CNG’ to be changed to ‘LNG/CNG’ in entire clause.
17	17.0	Sr. NO. of sub clause after sub clause 17.4	Correction is required	The sub clause should be numbered as 17.5
18	Figure I	Figure I	Typical Layout of Auto LNG/LCNG station on co-located MS/HSD RO.	<ol style="list-style-type: none"> 1. The minimum distance (s) mentioned in table of figure 1 to be in line with minimum distances mentioned in table of clause 3.1 (1) (a). 2. Capacity of tank mentioned is also not as per the proposed regulations, need to be corrected.
19		LNG ISO Tank Container		PESO is amending the definition of Pressure vessel to allow ISO Tank containers for LNG. PNGRB should also add the suitable changes to allow ISO tank containers for multimodal transportation and Storage.