

TGPL/Comm/2020-21/006

May 11, 2020

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

Sub.: Comments on Amendments in the PNGRB (Technical Standards and Specifications including Safety Standards for Retail Outlets dispensing Petroleum, Auto LPG and CNG), Regulations 2018.

Ref.: 1) Public Notice dated 17.02.2020
2) Amendments in the PNGRB (Technical Standards and Specifications including Safety Standards for Retail Outlets dispensing Petroleum, Auto LPG and CNG), Regulations 2018

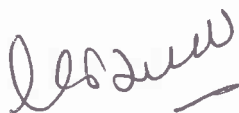
Dear Madam,

This is with reference to above mentioned Public Notice web-hosted by Honourable Board seeking views from stakeholders on the proposed in amendment in T4S Regulations for Retail Outlets dispensing Petroleum, Auto LPG and CNG.

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. Annexure-A - Amendments in the PNGRB (Technical Standards and Specifications including Safety Standards for Retail Outlets dispensing Petroleum, Auto LPG and CNG), Regulations 2018

The Clause (i) of the proposed amendment provides that the Board of the entity shall appoint one of its Directors for ensuring compliance to the T4S Regulations for Retail Outlets dispensing Petroleum, Auto LPG and CNG. We would like to humbly submit that Hon’ble Board may consider allowing one of the Key Management Personnel’s (KMP’s) for the same instead of a Director.



2. Annexure-I - Schedule 4: Storage, Handling and Dispensing at LNG/LCNG Dispensing Stations

2.1 Clause (2) - Definitions

It is requested that the Board may consider providing definition of Water Capacity and specifying minimum vapour capacity for the sake of clarity.

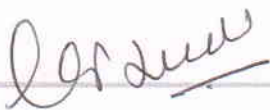
2.2 Clause (3.1) - Table 1 - Distances from Impound Wall and Property Line

The Hon'ble Board may consider providing definition of Water Capacity and specifying minimum vapour capacity for the sake of clarity.

- a. There is a typo error in Serial Numbers i.e. no. 4 and 5 are missing; this may be corrected.
- b. The water capacity of the largest vessel (m³) and Minimum distance from edge of impoundment or vessel drainage system to property line is varying with the Static and Mobile Pressure Vessels (Unfired) (Amendment) Rules, 2018. Example: The water capacity of the largest vessel (m³) in the range of >7.6 but < 63 the distance from impoundment is 7.6 Mtrs where as SMPV rule table 1, for the Water Capacity of the vessel (m³) in the range of 7.6 but not above 56.8 is 8 Mtrs. The Board may consider providing uniform table for the sake of clarity
- c. Minimum distance from edge of impoundment is water capacity of largest vessel(m³) and is in contradiction with the Note mentioned in below table1 i.e. "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". For example, if we have to install 2 vessels of 56.8m³, 15 m of minimum distance to me maintained but description mentions the distance from largest vessel. The Board may consider providing clarity in the matter.

2.3 Clause (3.1) - Table 2 - Minimum Distance Between Vessel and Dyke Wall

The Board may consider aligning Water capacity of vessel (m³) description in Table 1 with Table 2 for the sake of clarity.



2.4 Clause (3.1) - Table 4 - The minimum distance between various facilities at LNG, LCNG dispensing stations

- a. The Inter Distance / Norm for Sr. No. B.5 - LNG/LCNG and MS/ HSD Dispenser and Sr. No. B.8 - MS/HSD fill point/ Vent and Auto LNG/LCNG Dispenser is distance is 6 Meters and 9 Meters respectively which should be same for Dispensers. Also, as per OISD 179 the distances for dispensers is 4 Meters. The Board may consider modifying the same suitably.
- b. The Hon'ble Board may also consider revising minimum distance of Non-Fuelling facility is from the LNG/LCNG dispensers to 9 meters instead of 10 meters for the sake of clarity.

2.5 Clause 4(b)(3) – Relief valves

The size of relief valve provided seems to be large. It is suggested that instead of using such large vapour relief valve a combination of smaller dia liquid relief valve and vapour relief valve may be more appropriate and safer. The Board may consider revising subject clause appropriately.

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)