To,
The Secretary,
Petroleum and Natural Gas Regulatory Board (‘‘PNGRB/ Board’’),
1st Floor, World Trade Centre,
Babar Road, New Delhi — 110001


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

Dear Madam,

This is with reference to the abovementioned Public Notices web-hosted by Honourable Board seeking views from stakeholders on the proposed in amendments in the PNGRB (Codes of Practices for Emergency Response and Disaster Management Plan (ERDMP)) 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.
1.3 "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 Reporting 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.


2.1 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
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 Rule 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 Rule 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:

4"he 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

[Signature]
Utkarsh Bhatt
Vice President (Commercial)