

# Oregon Office of State Fire Marshal

## License and Permits Branch Liquefied Petroleum Gas Program



### NFPA 58 Standards Opinion

**NFPA 58-1.3.1 (2011) states in part: This code shall apply to the operation of all LP-Gas systems, including the following:**

- (1) Containers, piping, and associated equipment, when delivering LP-Gas to a building for use as a fuel gas.**

Date: January 3, 2012

Subject: The application of NFPA 58 to fuel gas piping systems supplying fuel gas to RVs when systems other than those regulated by NFPA 1192 are installed.

Brief History: It is popular for those using an RV as a temporary or permanent residency to utilize propane fuel gas systems other than those factory installed systems regulated by NFPA 1192. In those systems, the Office of State Fire Marshal has allowed the use of hose as a fuel gas distribution component as long as delivery pressures remain 10 psi or less, the gas line is protected against physical damage, and is regularly inspected for integrity.

Research & Advisory Background: It is necessary to use hose in many applications where portable appliances are being used. Hose is not allowed when supplying fuel gas to manufactured homes, residential occupancies, or commercial occupancies. Therefore, it would not be reasonable to allow hose to be used when supplying fuel gas to RVs when systems other than those regulated by NFPA 1192 are being used.

In an attempt to support this position with the interest of safety and consistency, the Office of State Fire Marshal sought a staff opinion from NFPA which follows in part:

*NFPA 58 is applicable to the operation of "all LP-Gas systems" as stated in previous and current editions of the Code, except as noted in section 1.3.2.*

*Section 1.3.2 states that the Code "shall not apply to...the manufacturing requirements for recreational vehicle LP-Gas systems that are addressed in NFPA 1192, Standard on Recreational Vehicles." NFPA 1192 applies to "all new recreational vehicles".*

*Chapter 5 of NFPA 1192 defines the fuel systems and equipment further, limiting the water capacity of containers and requiring propane containers to be installed integral to the recreational vehicle or on the tongue or A-frame of a travel or camping trailer. Therefore any container installed external to a recreational vehicle or larger than 105 lb water capacity is not part of the original manufacture of the recreational vehicle, and is therefore outside the scope of NFPA 1192.*

*Based on this, an external propane tank connected by a field-assembled fuel gas piping system to a recreational vehicle does not meet the threshold to be exempted from the requirements of NFPA 58, the LP-Gas Code, and is therefore subject to all applicable requirements of the LP-Gas Code.*

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*IMPORTANT NOTICE: This correspondence is not a Formal Interpretation issued pursuant to NFPA Regulations. Any opinion expressed is the personal opinion of the author, and does not necessarily represent the official position of the NFPA or its Technical Committees. In addition, this correspondence is neither intended, nor should be relied upon, to provide professional consultation or services.*

**Final Staff Opinion:** The Office of State Fire Marshal concurs with the NFPA staff opinion. Effective immediately fuel gas systems other than those regulated by NFPA 1192 supplying fuel gas to RVs must be installed in accordance with NFPA 58. Hose is prohibited as a fuel gas-piping system component unless approved in accordance with Section 1.5 of NFPA 58 (2011) which follows:

### **1.5 Equivalency**

Nothing in this code is intended to prevent the use of systems, methods, or devices of equivalent or superior quality, strength, fire resistance, effectiveness, durability, and safety over those prescribed by this code.

**1.5.1** Technical documentation shall be submitted to the authority having jurisdiction to demonstrate equivalency.

**1.5.2** The system method, or device shall be approved for the intended purpose by the authority having jurisdiction.

**IMPORTANT NOTE:** The final staff opinion is not retroactive. Systems installed prior to this staff opinion must be in compliance with the previous requirements as references in the “Brief History” of this staff opinion.

Approved by: Anita Phillips

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