



MATRIX PDM ENGINEERING

Harry C. Parker, PE
Mechanical Supervisor
Matrix PDM Engineering
100 Beecham Drive, Suite 200
Pittsburgh, PA 15205
(412) 894-2270
harryparker@Matrixpdm.com

October 23, 2024

Attn: Mr. Shane Kelley
Director, Standards and Rulemaking Division
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue
SE East Building, 2nd Floor
Washington, DC 20590

Dear Mr. Kelley,

Matrix PDM requests a PHMSA ruling on the following questions we have pertaining to ASME Pressure Vessels and Heat Exchangers, specifically compliance to NFPA 59A (2001) and PHMSA FAQ D5 & D6 when constructing this equipment for an LNG Facility:

- 1) Regarding section 3.4.2 of NFPA 59A (2001) wherein the words "pressure vessels" are used, and section 3.4.3 of NFPA 59A (2001) wherein the words "all heat exchangers" are used, does PHMSA interpret these words to mean literally all pressure vessels and all heat exchangers within the boundary limits of any LNG Facility (under PHMSA Jurisdiction), regardless of pressure vessel or heat exchanger service (NG, Air, N2, etc.) - and regardless of the state of the media contained (gas or liquid)?

- a. As an example, would this also include vessels and heat exchangers purposed as either compressed air receivers, compressed instrument air dryer tower vessels (such as for packaged heatless desiccant instrument air dryer skids), water propylene-glycol expansion tanks, water propylene-glycol air-cooled heat exchangers, gaseous nitrogen storage vessels, or other similar vessels meant for



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purposes of utility, or for inert or non-toxic/ non-hazardous fluid service, and not containing hydrocarbons nor hazardous fluids in any form? (Hazardous Fluids as defined in 49 CFR Part 193)

- b. Or do these requirements apply only to vessels and exchangers in hydrocarbon service or hazardous fluid service? (Hazardous Fluids as defined in 49 CFR Part 193)
- 2) Does PHMSA FAQ DS & D6 and the requirements outlined therein for demonstrating safety equivalency required by section 1.2 of NFPA 59A (2001) apply to literally all pressure vessels and heat exchangers within the boundary limits of an LNG Facility, regardless of pressure vessel or heat exchanger service?
 - a. Or are these requirements limited to vessels and heat exchangers in either hydrocarbon service or hazardous fluid service as per the description given in question (1b) above?
- 3) Does PHMSA fully adopt ASME BPVC Section VIII Division 1 paragraph U-1 Scope as it pertains to which pressure vessels and heat exchangers must be designed, constructed, tested, inspected and stamped according to the rules of this Division versus those that are not considered to be within the scope of this Division?
 - a. If for example we have a vessel that qualifies as exempt per paragraph U-1, does this mean that NFPA 59A (2001) section 1.2 and therefore PHMSA FAQ DS & D6 do not apply?

As standard practice we err on the side of a conservative interpretation of these rules but would nevertheless like to know if we're over-applying FAQ DS and D6 and the requirement for demonstrating safety equivalency. We appreciate your assistance and forthcoming ruling on these matters.

Best regards,


Digital signed by
Harry Parker@matrixpdm.com
DN: cn=Harry Parker@matrixpdm.com
Date: 2024.10.23 14:58:24-04'00'

Harry C. Parker, PE
Mechanical Supervisor

CC: Chad R. Green, PE, Mechanical Chief (Matrix PDM)

