



September 19, 2022

Ms. Teresa B. Payne, Administrator,
Office of Manufactured Housing Programs,
Office of Housing,
Department of Housing and Urban Development,
451 7th Street SW, Washington, DC 20410

Submission via [regulations.gov](https://www.regulations.gov)

Re: Office of Department of Housing and Urban Development Notice of Proposed Rulemaking for Manufactured Home and Construction and Safety Standards, 24 CFR Parts 3280, 3282, 3285 and 3286 [Docket Number FR-6233-P-01]

Dear Ms. Payne:

The American Gas Association ("AGA"), appreciates the opportunity to provide comments in response to the Department of Housing and Urban Development's ("HUD") Notification of Proposed Rulemaking ("NOPR")¹ for proposed changes to the Manufactured Home Construction and Safety Standards.

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 77 million residential, commercial, and industrial natural gas customers in the U.S., of which 95 percent — more than 73 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one-third of the United States' energy needs.

A. Update of Referenced Industry Safety Standards

The NOPR would propose updating existing reference standards for appliances and components used in the construction of manufactured homes that, although more current than existing

¹ *Manufactured Home Construction and Safety Standards*, 87 Fed Reg. 43114 (July 19, 2022).

referenced standards, do not reflect the most current edition of these standards. Mandating the use of appliances and components that meet outdated standards puts a burden on the manufacturers to maintain outdated equipment, and does not allow manufactured homes owners the opportunity to have the most current products installed. AGA recommends that HUD consider a review of the standards and update the references to most current edition of the standards. Specifically, AGA recommends the following standards and codes for gas-fired appliances and accessories, including controls and tubing, be considered:

J. Revisions to Standards Incorporated by Reference (Reference Standards)

12	U	<u>CSA/ANSI LC 1 • CSA 6.26</u>	<u>CSA Group</u>	Fuel Gas Piping Systems Using Corrugated Stainless Steel Tubing	2014 <u>2019</u>	(g)(8)	3280.705(b)
13	U	<u>CSA/ANSI Z1.1 • CSA 1.1</u>	<u>CSA Group</u>	Household cooking gas appliances	2016 <u>2019</u>	(g)(9)	3280.703(a)(13)
14	U	<u>ANSI Z21.5.1 • CSA 7.1</u>	<u>CSA Group</u>	Gas Clothes Dryers - Volume 1, Type 1 Clothes Dryers	2015 <u>2017</u>	(g)(11)	3280.703(a)(15), 3280.707(d)
15	U	<u>CSA/ANSI Z21.10.1 • CSA 4.1</u>	<u>CSA Group</u>	Gas water heaters, volume I, storage water heaters with input ratings of 75,000 Btu per hour or less	2014 <u>2019</u>	(g)(11)	3280.703(a)(15), 3280.707(d)
16	U	<u>CSA/ANSI Z21.10.3 • CSA 4.3</u>	<u>CSA Group</u>	Gas Water Heaters - Volume III, Storage Water Heaters With Input Ratings Above 75,000 Btu Per Hour	2014 <u>2019</u>	(g)(12)	3280.703(a)(8)

17	U	ANSI Z21.15 • <u>CSA 9.1</u>	<u>CSA Group</u>	Manually operated gas valves for appliances, appliance connector valves and hose-end valves	2009(R2019)	(g)(13)	3280.703(c)(4), 3280.705 (c) and (l)
18	U	<u>CSA/ANSI</u> Z21.19 • <u>CSA 1.4</u>	<u>CSA Group</u>	Refrigerators using gas fuel	2014 <u>2019</u>	(g)(14)	3280.703(a)(14)
19	U	ANSI Z21.20	<u>CSA Group</u>	Automatic gas ignition systems and components	2014	(g)(15)	3280.703(d)(9)
20	U	<u>CSA/ANSI</u> Z21.21 • <u>CSA 6.5</u>	<u>CSA Group</u>	Automatic gas valves for gas appliances	2012 <u>2019</u>	(g)(16)	3280.703(d)(10)
21	U	<u>CSA/ANSI</u> Z21.23 • <u>CSA 6.6</u>	<u>CSA Group</u>	Gas appliance thermostats	2000 <u>2022</u>	(g)(20)	3280.703(d)(11)
22	U	<u>CSA/ANSI</u> Z21.24 • <u>CSA 6.10</u>	<u>CSA Group</u>	Connectors for gas appliances	2006 <u>2022</u>	(g)(19)	3280.703(c)(3)
23	U	<u>ANSI</u> Z21.40.1 • <u>CSA 2.91</u>	<u>CSA Group</u>	Gas fired heat activated air conditioning and heat pump appliances	1996	(g)(20)	3280.703(a)(9), 3280.703(a)
24	U	<u>CSA/ANSI</u> Z21.47 • <u>CSA 2.3</u>	<u>CSA Group</u>	Gas-fired central furnaces	2012 <u>2021</u>	(g)(21)	3280.703(a)(10)
25	U	ANSI Z21.75 • <u>CSA 6.27</u>	<u>CSA Group</u>	Connectors for outdoor gas appliances and manufactured homes	2007 <u>2016</u>	(g)(22)	3280.703(a)(11)
65	U	<u>NFPA</u> <u>54/ANSI</u> <u>Z223.1</u>	National Fire	National Fuel Gas Code	2015 <u>2021</u>	(bb)(3)	3280.703(d)(14)

			protection Association				
66	U	<u>NFPA 58</u>	National Fire protection Association	Standard for the Storage and Handling of Liquefied Petroleum Gases	2014 <u>2020</u>	(bb)(4)	3280.703(d)(16)

III. Incorporation by Reference

12. CSA/ANSI LC 1-2019 • CSA 6.26-2019-2014, *Fuel Gas Piping Systems Using Corrugated Stainless Steel Tubing*. The proposed rule would update ANSI/IAS LC 1–1997. This standard provides the general applicable requirements for the installation of natural and propane gas piping systems using corrugated stainless steel tubing in residential, commercial, or industrial buildings. This includes requirements for the installation of corrugated stainless steel piping systems in which portions of the piping are exposed to the outdoors as required to make connections to outdoor gas meters or to outdoor gas appliances, which are attached to, mounted on, or located near the building structure. This standard is available through HUD’s online reading room.

13. CSA/ANSI Z21.1-2019 • CSA 1.1-2019–2016, *Household Cooking Gas Appliances*. The proposed rule would update ANSI Z21.1–2000. This standard specifies guidelines for the newly produced household cooking gas appliances constructed entirely of new, unused parts and materials. These appliances may be floor-supported or built-in. This standard is available through HUD’s online reading room.

14. ANSI Z21.5.1-2017 • CSA 7.12-2017–2015, *Gas Clothes Dryers Volume 1, Type 1 Clothes Dryers*. The proposed rule would update ANSI Z21.51.1–1999, Gas Clothes Dryers Volume 1, Type 1 Clothes Dryers, with Addendum z21.5.1a–1999. This standard specifies guidelines for newly produced Type 1 clothes dryers constructed entirely of new, unused parts and materials for use with natural gas, manufactured gas, mixed gas, propane gas, LP gas-air mixtures, and for mobile home installation. This standard is available through HUD’s online reading room.

15. CSA/ANSI Z21.10.1-2019 • CSA 4.1-2019–2014, *Gas Water Heaters Volume 1, Storage Water Heaters with Input Ratings of 75,000 BTU per Hour or Less*. The proposed rule would update ANSI Z21.10.1–1998, Gas Water Heaters—Volume 1, Storage Water Heaters with Input Ratings of 75,000 BTU per hour or Less, with Addendum Z21.10.1a–2000. This standard specifies guidelines for newly produced, automatic storage water heaters having input ratings of 75,000 Btu/hr (21,980 W) or less, hereinafter referred to as water heaters or appliances, constructed entirely of new, unused parts and materials. This standard is available through HUD’s online reading room.

16. CSA/ANSI Z21.10.3-2019 • CSA 4.3-2019–2014 *Gas-fired Water Heaters Volume 3, Storage Water Heaters with Input Ratings Above 75,000 BTU per Hour, Circulating and Instantaneous*.

This proposed rule would add this standard for incorporation by reference. This standard specifies guidelines for newly produced, large automatic storage water heaters having input ratings about 75,000 Btu/hr (21,980 W), instantaneous water heaters, and circulating water heaters including booster water heaters, constructed entirely of new, unused parts and materials. This standard is available through HUD's online reading room.

17. *ANSI Z21.15-2009(R2019) • CSA 9.1-2009(R2019), Manually Operated Gas Valves for Appliances, Appliance Connector Valves and Hose End Valves.* The proposed rule would update ANSI Z21.15–1997. This standard applies to manually operated gas valves not exceeding 4 inch (102 mm) pipe size, and pilot shut-off devices. This standard is available through HUD's online reading room.

18. *CSA/ANSI Z21.19-2019 • CSA 1.4-2019–2014, Refrigerators Using Gas Fuel.* The proposed rule would update ANSI Z21.19–1990, with Addendum ANSI Z21 19a–1992 and ANSI Z21 19b–1995. This standard specifies guidelines for gas-fired refrigerators having refrigerated spaces for storage of foods, storage of foods and making ice, storage of frozen foods and making ice, or storage of foods and the storage of frozen foods and making ice. The standard applies to newly produced refrigerators constructed entirely of new, unused parts and materials. This standard is available through HUD's online reading room.

19. *ANSI Z21.20–2014, Automatic Gas Ignitions Systems and Components.* This proposed rule would update ANSI Z21.20 with Addendum Z21.20a–2000. This standard specifies guidelines for newly produced automatic gas ignition systems and components constructed entirely of new, unused parts and materials. This standard is available through HUD's online reading room.

20. *CSA/ANSI Z21.21-2019 • CSA 6.5-2019–2012, Automatic Valves for Gas Appliances.* This proposed rule would update ANZI Z21.21–2000. This standard specifies guidelines for newly produced automatic valves constructed entirely of new, unused parts and materials. These valves may be individual automatic valves or valves utilized as parts of automatic gas ignition systems. The standard also applies to commercial/ industrial safety shutoff valves, also referred to as C/I valves. This standard is available through HUD's online reading room.

21. *CSA/ANSI Z21.23-2022 • CSA 6.6-2022–2000 (R2005), Gas Appliance Thermostats with ANSI Z21.23a–2003 (Addenda 1) and ANSI 21.23b–2005 (Addenda 2).* This proposed rule would update ANSI Z21.23–1993. This standard specifies guidelines for newly produced gas appliance thermostats of the integral gas valve type having a maximum operating gas pressure of 1/2 psi (3.5 kPa) or electric type. This standard is available through HUD's online reading room.

22. *CSA/ANSI Z21.24-2022 • CSA 6.10-2022 2006 (R2011), Connectors for Gas Appliances.* This proposed rule would update ANSI Z21.24–1997/CGA 6.10–M97, Connectors for Gas Appliances, and remove the reference to the Compressed Gas Association. This standard specifies guidelines for newly produced gas appliance connectors constructed entirely of new unused parts and materials, having nominal internal diameters of 1/4, 3/8, 1/2, 5/8, 3/4 and 1 inch, and having fittings at both ends provided with taper pipe threads for connection to a gas appliance

and to house piping. Guidelines cover assembled appliance connectors not exceeding a nominal length of six (6) feet (1.83 meters). Connectors listed under this standard are intended for use with gas appliances that are not frequently moved after installation. This standard is available through HUD's online reading room.

23. *ANSI Z21.40.1–1996(R2022) • CSA 2.91-1996(R2022), Gas Fired, Heat Activated Air Conditioning and Heat Pump Appliances*. This proposed rule would correct the title of this standard from ANSI Z21.40.1–1996/ CGA 2.91–M96, Gas-Fired, Heat Activated Air Conditioning and Heat Pump Appliances, to remove the reference to the Compressed Gas Association. This standard has already been approved for incorporation by reference for §§ 3280.703 and 3280.714(a) by the Director of the Office of the Federal Register and is unchanged. This standard is available through HUD's online reading room.

24. *CSA/ANSI Z21.47-2021 • CSA 2.3-2021–2012, Gas Fired Central Furnaces (Except Direct Vent Systems)*. The proposed rule would update ANSI Z21.47–1990 with Addendum Z21.4a–1990 and Z21.47b– 1992, Gas-Fired Central Furnaces (Except Direct Vent System Central Furnaces). The updated standard contains new and revised requirements for documentation and testing and sets forth basic standards for the safe operation, substantial and durable construction, and acceptable performance of gas-fired central furnaces. This standard has been previously approved for incorporation by reference at 10 CFR 431.75. This standard is available through HUD's online reading room.

25. *ANSI Z21.75-2016 • CSA 6.27-2016–2007, Connectors for Outdoor Gas Appliances and Manufactured Homes*. This proposed rule would add this standard for incorporation by reference. This standard specifies guidelines for newly produced assembled connectors constructed entirely of new, unused parts and materials. This standard is available through HUD's online reading room.

65. *NFPA 54/ANSI Z223.1-2021–2015, National Fuel Gas Code*. The proposed rule would update NFPA 54–2002, National Fuel Gas Code. This standard provides minimum safety requirements for the design and installation of fuel gas piping systems in homes and other buildings. This standard is available through HUD's online reading room.

66. *NFPA 58–20202014, Standard for the Storage and Handling of Liquefied Petroleum Gases*. The proposed rule would update NFPA 58, Liquefied Petroleum Gas Code, 2001 Edition. This standard sets forth the requirements for safe liquified petroleum gas storage, handling, transportation, and use. This standard mitigates risks and ensures safe installations, to prevent failures, leaks, and tampering that could lead to fires and explosions. This standard is available through HUD's online reading room.

Additionally, AGA recommends that CSA Group, the accredited standards development organization for most of the above listed standards, should be included in the resources.

In addition to reviewing these standards on-line, copies of the standards may be obtained from the organization that developed the standard as follows:

ADD

CSA Group

8501 East Pleasant Valley Road

Independence, OH 44131

Website: csagroup.org

§ 3280.4 Incorporation by reference.

ADD

CSA Group

8501 East Pleasant Valley Road

Independence, OH 44131

Website: csagroup.org

B. Heating, Cooling and Fuel Burning Systems

a. Paragraph 3280.709(a)

HUD proposes to revise § 3280.709(a) to remove the language that requires manufacturers to leave appliance manufacturer instructions attached to appliances. AGA appreciates the concern that users of the code may interpret this paragraph to require duplicate set of instructions, the CSA/ANSI standards currently require that these instructions be attached as part of the appliance's certification. Removal of this requirement will cause a conflict with the safety standards and fuel gas installation code requirements.

b. Paragraph 3280.709(g)

HUD proposes to revise § 3280.709(g) to allow any fireplace or wood stove, provided they are listed or certified for their intended purpose, to be installed regardless of the testing and certification requirements specified by the *Standard for Vented Gas Fireplace Heaters*, CSA/ANSI Z21.88-2019 • CSA 2.33-2019. The standard has specific requirements for appliances intended for installation in manufactured and mobile homes, including provisions for converting from natural gas to propane, means to fasten burners to prevent movement during transport, venting, and marking and labeling requirements. Using an appliance not tested and certified for mobile/manufactured homes could be in violation of the listing and certification of the product.

c. Paragraph 3280.707 Heat Producing Appliances

Paragraph 3280.707(d)(2) specifies the method of test to determine energy efficiency compliance for gas-fired water heaters as specified in ANSI Standard Z21.10.1. However, these requirements were removed from the ANSI Z21.10.1 standard more than a decade ago. The

Manufactured Home Construction and Safety Standards should reference the applicable 10 CFR requirements established by the Department of Energy.

C. Conclusion

AGA thanks HUD for the review and consideration of these comments and the requests contained herein. If you have any questions regarding this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. J. Agen", is positioned above a horizontal line.

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