

**STATE OF OREGON
BUILDING CODES DIVISION**

STATEWIDE INTERPRETATION

No. C202 (G2403)

(Revised version of IR 93-79)

OREGON MECHANICAL SPECIALTY CODE

SUBJECT: “Point of Delivery” – Liquefied Petroleum Gas

CODE SECTION: *Oregon Mechanical Specialty Code (OMSC)*, Section C202, Definitions and *Oregon Residential Specialty Code (ORSC)*, Section G2403, General Definitions.

CODE EDITION: 2004 (and 2007) *OMSC* and 2005 *ORSC*.

DATE: Revised October 1, 2006

QUESTION: What is the demarcation point concerning the regulatory authority for liquefied petroleum gas (LPG) systems in residential, multi-family, commercial and/or industrial construction?

ANSWER: The demarcation point, as it pertains to regulatory authority between the State Fire Marshals Office and Building Codes Division is the “**Point of Delivery**”, which is defined in the *OMSC* and the *ORSC* as the first stage regulator.

There are typically two, and possibly three regulatory authorities involved in the installation of an LPG system.

1. State Fire Marshal Office (SFM) (which includes an *Exempt Jurisdiction).
2. Building Codes Division (BCD) or a local jurisdiction charged with enforcement of the state adopted mechanical codes.
3. Oregon Public Utility Commission (PUC)

The SFM* regulates the installation and placement of LPG tanks, and all associated piping up to and including the systems first stage regulator. The SFM* has the statutory authority (ORS 480.420) to issue permits, conduct inspections and to regulate these installations using appropriate codes and standards, which in this case is the Oregon Fire Code, NFPA 58 and NFPA 54. The SFM’s office also regulates the licensing of LP installers under ORS 480.432.

BCD staff or local jurisdictions shall issue permits and conduct inspections for all work installed after the first stage regulator. Depending on occupancy classification, this work may be regulated under the *OMSC* or the *ORSC*. NFPA 54 may be used as an alternate to the prescriptive **testing** requirements found in the code.

In addition, systems supplying 10 or more customers are subject to federal laws which are regulated through the Oregon Public Utilities Commission.

* An exempt jurisdiction is a local fire department that has formally been exempted from statutes, rules and regulations administered by the State Fire Marshal, based on the local fire departments adoption of adequate regulations generally conforming to state and national standards concerning fire prevention. See ORS 476.030(3)