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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF FIRE SERVICES
RICHARD W. MILLER
STATE FIRE MARSHAL

MIKE ZIMMER
DIRECTOR

April 21, 2015

Mr. Dean Rivest
Vice President and General Manager
Industrial Division
OmegaFlex, Incorporated
451 Creamery Way
Exton, Pennsylvania 19341-2509

Dear Mr. Rivest:

SUBJECT: Request for Approval of the OmegaFlex, Inc., DoubleTrac for Use as Piping Components of Aboveground Storage Tank (AST) Systems in Michigan

This letter is in response to your March 26, 2015, correspondence requesting approval of the OmegaFlex, Inc., DoubleTrac piping system for use as an aboveground piping component of storage tank systems in Michigan.

Technical staff of the Michigan Department of Licensing and Regulatory Affairs (LARA), Bureau of Fire Services (BFS), Storage Tank Division (STD), reviewed the documentation submitted including third-party testing results following 16,000 hours of accelerated ultraviolet aging to simulate use in aboveground storage tank systems.

The BFS-STD adopted National Fire Protection Association (NFPA) Pamphlet 30, 2012 Edition October 14, 2014, as Part 1 of the Michigan Flammable/Combustible Liquids (FL/CL) Rules. Part 1 of the FL/CL Rules, Chapter 27, indicates that the design, fabrication, assembly, test, and inspection of piping systems must be suitable for the working pressures and structural stresses to be encountered by the piping system. In addition the section requires compliance with applicable sections of ASME B31, *Code for Pressure Piping*, and the provisions of Chapter 27.

Furthermore, Section 27.4 of the FL/CL Rules allows low melting point materials, such as plastics, to be used underground within the pressure and temperature limitations of ASME B31, *Code for Pressure Piping*. The section goes on to allow these materials to be used outdoors aboveground, provided they are designed and built in accordance with recognized standards, are compatible with the liquids being handled and meet one of the following conditions:

- They are resistant to damage by fire.
- They are located so that any leakage resulting from failure will not expose persons, important buildings, or structures.
- They are located where leakage can be controlled by operation of one or more accessible, remotely located valves.


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The review indicates OmegaFlex, Inc., DoubleTrac piping system is built to recognized Underwriters Laboratory UL 971A Standard. Therefore, when the OmegaFlex, Inc., DoubleTrac piping system is installed with compatible liquids and meets one of the indicated conditions, it can be used aboveground.

The LARA and BFS-STD, reserves the right to withdraw this recognition or to disapprove any plans for the utilization of the OmegaFlex, Inc., DoubleTrac piping system in Michigan if any of the above conditions of approval are not complied with, or if the utilization of the OmegaFlex, Inc., DoubleTrac piping system results in any adverse impact on public health and the environment.

If additional clarification is needed, please contact Marcia Poxson, Engineer Specialist, at 517-373-3290, or poxsonm@michigan.gov.

Regards,



Richard W. Miller
State Fire Marshal

cc: Marcia Poxson, LARA
Hazardous Materials Storage Inspectors, LARA