

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

Manufactured Home Construction)	
and Safety Standards)	FR-6149-P-01
Proposed Rule)	RIN 2503-AJ49

**COMMENTS OF THE
AMERICAN GAS ASSOCIATION
March 31, 2020**

The American Gas Association (AGA), founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 75 million residential, commercial and industrial natural gas customers in the U.S., of which 95 percent — more than 71 million customers — receive their gas from AGA members. Today, natural gas meets more than 30 percent of the United States' energy needs.

AGA has participated in previous rulemakings of the Department and serves as a long-standing member of standards technical committees germane to the proposed rule, including ASHRAE Standing Standard Project Committee (SSPC) 62.2, which is responsible for ASHRAE Standards 62.2, “Ventilation and Acceptable Indoor Air Quality in Low-Rise Residential Buildings,” and UL Standards Technical Panel (STP) 2034, which is responsible for UL Standard 2034, “Standard for Single and Multiple Station Carbon Monoxide Alarms. AGA was also a key proponent of development of NFPA Standard 720, “Standard for Installation Carbon Monoxide (CO) Detection and Warning Equipment” and was a participant in the Fire Protection Research Foundation project that provided the technical basis for Standard 720. AGA has been a long-standing participant in carbon monoxide (CO) issues with the U. S. Consumer Product Safety Commission (CPSC) and reviewer and user of CPSC CO incident data.

AGA finds that the proposed rule’s coverage of CO alarm requirements would be insufficient under the new §3280.211 in protecting occupants of manufactured housing because of its limited coverage. All manufactured housing should have CO alarms and not limited to homes with fuel-fired appliances, designs for installing attached garages, or designs for installation over basements. According to data from CPSC for non-fire related CO fatalities through 2015 (the most recent data, which was published in December 2018):¹

- “There were 103 incidents resulting in an estimated 175 unintentional non-fire CO poisoning deaths associated with the use of consumer products under the CPSC’s jurisdiction.”
- “Twenty percent of the 103 incidents involved multiple deaths, including an incident in which eight members of a family died while using a generator as a power source.”

¹Hnatov, M. “Non-Fire Carbon Monoxide Deaths Associated with the Use of Consumer Products 2015 Annual Estimates,” U. S. Consumer Product Safety Commission, December 2018.

- “Engine-Driven Tools (EDTs) were associated with more than half of non-fire CO poisoning deaths. This category includes generators. An estimated 94 deaths (54 percent) were associated with EDTs alone while an estimated 98 deaths (56 percent) were associated with EDTs, including multiple-product incidents in which at least one of the products was an EDT. Ninety of the estimated 98 deaths involved generators.”

These are the top three observations of CPSC for annual CO fatalities as of the 2018 report. Over the past 20 years, the cited products (generators and EDTs) represent the only categories of CO source fatalities that are growing in frequency. Yet the new §3280.211 requirements would provide no direct protection from occupants of manufactured homes except where coincident housing-related factors of installed fuel-fired appliances, designs for installing attached garages, or designs for installation over basements were relevant. Furthermore, the §3280.211 requirements would not protect occupants where other sources such as use of portable heating appliances or from misuse of charcoal grills indoors (both reflected in CO incident data) following completion of manufactured housing installation and commissioning. Indeed, occupants of “all-electric” homes may be particularly vulnerable during periods of electrical outage.

While the new §3280.211 would be consistent with occupancy-related installation requirements of International Residential Code Section R315, AGA has long argued that these requirements, too, provide insufficient coverage of occupants. HUD should not make this mistake in its manufactured housing requirements.

Respectfully submitted,

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