

**From:** Kristy Mastromichalis <[kmastromichalis@cganet.com](mailto:kmastromichalis@cganet.com)>  
**Sent:** Friday, January 17, 2020 9:35 AM  
**To:** PSA Department <[PSA@ansi.org](mailto:PSA@ansi.org)>  
**Cc:** Kristy Mastromichalis <[kmastromichalis@cganet.com](mailto:kmastromichalis@cganet.com)>  
**Subject:** CGA Comments on Proposed Revision to the ANSI Essential Requirements: Due process Requirements for American National Standards

January 17, 2020

Executive Standards Council (ExSC)  
American National Standards Institute (ANSI)  
25 West 43rd Street  
4<sup>th</sup> Floor  
New York, NY 10036  
*Submitted via [psa@ansi.org](mailto:psa@ansi.org)*

RE: Proposed Revision to the *ANSI Essential Requirements: Due process Requirements for American National Standards*

Dear Members of Executive Standards Council (ExSC):

The Compressed Gas Association (CGA), founded in 1913, is dedicated to the development and promotion of safety standards and safe practices in the industrial, medical, and food gases industry. CGA represents more than 130 member companies in all facets of the industry – manufacturers, distributors, suppliers, and transporters of gases, cryogenic liquids, and related products and services. Through a committee system, CGA develops technical specifications, safety standards including five American National Standards, and training and educational materials, and works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations and standards.

The purpose of this letter is to provide comments on proposed revision to the *ANSI Essential Requirements: Due process Requirements for American National Standards* on the following proposed change under “2.3 Balance”, Lines 47-49:

*A “General Interest” category, if one is offered, should include only those whose business or other interests are not covered by a discretely defined interest category, or those who represent multiple interest categories.*

More specifically, CGA has concerns regarding the phrase “or those who represent multiple interest categories” and CGA suggests that this phrase be deleted from this proposed change or specifically clarify whether persons who represent multiple interest categories can elect to represent one of those categories, or are required to be classified as general interest.

CGA limits consensus body participants to one interest category. If a membership application is received from an individual with more than one interest category selected, CGA contacts the submitter to allow them to determine which interest category is the *most appropriate*. As written, this proposed text may be interpreted that self-selection of a single interest category is no longer an option and a person/business who represents multiple interest categories may be categorized as general interest regardless of any other appropriate interest categories.

CGA believes that this change may result in many Standards Development Organizations (SDOs) not being able to achieve balance. For example, CGA is currently revising CGA H-5, *Standard for Bulk Hydrogen Supply Systems (an American National Standard)*. Overall, there are 12 voters represented in the following interest categories:

- Producers (producers and distributors of gas and liquid hydrogen);
- User (industrial customers and others who use hydrogen in its varied applications);
- General interest (U.S. Department of Energy, universities, national laboratories);
- Other ([SDOs]); and
- Equipment suppliers (manufacturers of equipment used in hydrogen storage and dispensing).

If the persons/companies who could potentially represent multiple interest categories were no longer allowed to select the most appropriate category, at least 5 out of the 12 voting members would be changed to general interest and balance would be lost. Achieving balance can be a time-consuming challenge for many SDOs and this change may make it impossible for those developing safety-related standards.

CGA appreciates the opportunity to provide comments and looks forward to the availability of the revised *Essential Requirements*. If you have any questions, please contact me at 703-788-2728 or via email [kmastromichalis@cganet.com](mailto:kmastromichalis@cganet.com).

Sincerely,



**Kristy L. Mastromichalis**  
Committee Project Manager  
Compressed Gas Association, Inc.  
14501 George Carter Way, Suite 103  
Chantilly, VA 20151  
703-788-2728 - phone  
703-961-1831 – fax  
[kmastromichalis@cganet.com](mailto:kmastromichalis@cganet.com)