Maryland Department of Labor

&

Office of the State Fire Marshal

Fuel Gas Piping Systems and Corrugated Stainless Steel Tubing Study

Interim Report
December 1, 2025

Maryland
DEPARTMENT OF LABOR

MSAR# 16381
December 1, 2025

Governor Wes Moore
Maryland State House
100 State Circle
Annapolis, MD 21401

Senator Brian Feldman
Chair, Senate Committee on Education,
Energy, and the Environment
Miller Senate Office Building, 2 West Wing
11 Bladen Street
Annapolis, MD 21401

The Honorable Bill Ferguson
Maryland Senate, President
100 State Circle, H-107
Annapolis, Maryland 21401

Delegate Marc Korman
Chair, House Environment and
Transportation Committee
Lowe House Office Building, Room 251
6 Bladen Street
Annapolis, MD 21401

The Honorable Joseline A. Peña-Melnyk
Maryland House of Delegates, Speaker
100 State Circle, H-101
Annapolis, Maryland 21401

Dear Governor Moore, President Ferguson, Speaker Peña-Melnyk, Senator Feldman, and Delegate Korman:

We are pleased to provide this interim report on the Fuel Gas Piping Systems and Corrugated Stainless Steel Tubing Study as required by Ch.'s 384 & 385 Acts of 2025 (HB222 & SB 175).

The legislation requires the Maryland Department of Labor and the Office of State Fire Marshal to issue an interim report to the Legislative Policy Committee in accordance with § 2–1257 of the State Government Article.

The interim report is attached for your review and consideration. Should you have questions or comments regarding the report, please contact Andrew Fulginiti, Director of Legislative Affairs, at andrew.fulginiti@maryland.gov or (443) 401-5129 or Catherine Kelly, Director, Government Affairs Unit, Maryland State Police, at catherinea.kelly@maryland.gov or (410) 260-610.

Sincerely,

Portia Wu
Secretary, Maryland Department of Labor

Colonel Michael A. Jackson
Acting Superintendent, Maryland State Police

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Executive Summary

During the 2025 session of the Maryland General Assembly (MGA), House Bill 222 and Senate Bill 175 were passed into law and signed by Governor Wes Moore as Chapters 384 and 385, Acts of 2025. The two identical bills, among other provisions, directed the Maryland Department of Labor (MD Labor) and the Office of the State Fire Marshal (OSFM) to conduct a study and propose recommendations related to preventing fire hazards associated with commonly used fuel gas piping systems, including gas piping and corrugated stainless steel tubing (CSST), in residential and commercial buildings.

At the time of the writing of this interim report, MD Labor and the OSFM have performed initial technical research on the various elements as prescribed and met with all but one of the organizations required by Chapters 384 and 385, Acts of 2025. The final report in this study is due on September 1, 2026, and will contain detailed recommendations and best practices aimed at preventing fire hazards associated with fuel gas piping, including CSST. However, the study leads have identified early on that maintaining proper bonding of CSST in accordance with manufacturers' specifications and Maryland Building Performance Standards is essential to reducing fire hazards associated with lightning strikes resulting in CSST failure.

Section 1: Study Requirements

The mandated study requires the following actions from MD Labor and OSFM:

- Studying and comparing the fire hazard risks of different types of fuel gas piping systems, including gas piping and corrugated stainless steel tubing;
- Studying the likelihood of fuel gas piping systems, including gas piping and corrugated stainless steel tubing, causing a fire in a residential or commercial building following a direct or indirect lightning strike;
- Analyzing the effectiveness of existing standards and requirements in the State related to fuel gas piping systems, including gas piping and corrugated stainless steel tubing, and identifying areas for improvement;
- Analyzing and identifying the best practices for state and local legislative, regulatory, and building code standards for fuel gas piping systems, including gas piping and corrugated stainless steel tubing;
- Identifying potential legislative or regulatory changes in the State to prevent or minimize the fire hazards associated with fuel gas piping systems, including gas piping and corrugated stainless steel tubing, § 12–206 of the Public Safety Article, and § 19–108 of the Business Regulation Article;
- Determining what industry standards or requirements are necessary to prevent or minimize the fire hazards associated with fuel gas piping systems, including gas piping and corrugated stainless steel tubing;
- Determining what standards or requirements are necessary, if any, to address aggravating factors that may reasonably contribute to the failure or malfunctioning of fuel

gas piping systems, including gas piping and corrugated stainless steel tubing, and create a fire hazard, such as improper installation or grounding;
- Assessing the prevalence of non–arc–resistant jacketed corrugated stainless steel tubing in residential and commercial buildings and its potential fire hazards; and
- Assessing the feasibility of implementing the standards and requirements identified in this study.

In carrying out the study, MD Labor and the OSFM are required to consult with the State Fire Prevention Commission, local jurisdictions that are responsible for residential and commercial gas fitting inspections, and manufacturers of all fuel gas piping systems and CSST.

The following sections are intended to provide an update on the current progress of the study.

Section 2: Study Progress

Study Timeline

The study requirements became effective July 1, 2025, with this interim report due December 1, 2025, and a final report due September 1, 2026.

Despite limited resources and staffing, the Maryland Department of Labor and the Office of the State Fire Marshal have made strong progress on the Fuel Gas Piping Systems and CSST Study. In addition to technical research and collaboration, the Departments have been jointly engaging with the stakeholders required by Ch.'s 384 & 385 Acts of 2025, including local government entities responsible for residential or commercial gas fitting inspections, manufacturers of fuel gas piping systems and corrugated stainless steel tubing, and a brief update to the State Fire Prevention Commission was provided. Additionally, the study members met with members of the State Plumbing Board in coordination with the Division of Occupational and Professional Licensing.

In addition to independent research from study leads and internal departmental meetings, the following dates track research meetings held jointly by MD Labor & OSFM:

July 23, 2025: MD Labor and OSFM held a joint kick-off meeting on July 23rd, 2025

August 12, 2025: Members of the Maryland Board of Plumbing

August 25, 2025: Manufacturers of fuel gas piping and CSST, representatives from the Maryland Board of Plumbing, and two local code officials. CSST manufacturers, including Pro-Flex, OmegaFlex (TracPipe), WARDflex, and Home-Flex.

October 17, 2025: Local jurisdictions responsible for residential and commercial gas fitting inspections, including representatives from Howard, Frederick, and Baltimore counties as well as leadership from the Maryland Building Codes Officials, a professional organization comprised of over 350 county and municipal code enforcement officials from across Maryland.

October 28, 2025: Fuel gas piping manufacturer Gastite, which manufactures CSST products for Canada and the United States, including “Flashshield+”, which is a patented product that is manufactured to meet its own LC1027 evaluation standard

Section 3: Initial Findings

Early findings in this study have demonstrated that proper and continuous bonding of CSST in accordance with the manufacturer’s specifications and Maryland Building Performance Standards is vital in reducing fire hazards associated with CSST failure.

Section 4: Next Steps

Between the submission of this interim report and the submission of the final report on September 1, 2026, the study leads plan to reconvene relevant and required stakeholders and conduct further research. There will be a concentrated focus on indirect and direct lightning strikes and their effects on fuel gas piping systems and CSST, including scientifically backed data regarding lightning strikes. The study leads will source this data from academic and governmental institutions.