

2020 Pipeline Safety Conference – Q&A Session

PHMSA Summary & Performance Based Regulations – Chris McLaren, PHMSA

Questions:

1. Can you ask Chris if there will be formal training for state inspectors on the MegaRule I requirements?
2. Is the stay of RIN-1 still in effect until Dec 2020? This was issued in April due to the covid-19.

Answers:

1. There is a public meeting that has files posted <https://primis.phmsa.dot.gov/meetings/MtgHome.mtg?mtg=146>, and Chris Hoidal (chris.hoidal@dot.gov) can be contacted to provide additional support. Some presentations have been done by PHMSA. I know that he and Steve Nanney were going to do something for Ohio, and that meeting would be a good one to participate in – contact Pete Chase. Also, Louisiana State Seminar had a contractor provide insights, and Steven Giambrone (LADNR) could be contacted for those files and insights.
2. The stay was issued to support implementation issues that were occurring and provide additional time for these actions to occur. I am not aware of the basis or reasons provided. Chris Hoidal (chris.hoidal@dot.gov) is the Implementation Team Lead for the Gas Rule.

Annual Data Report – Chris Whiteash, PA PUC

Question:

1. Do you have normalized data for these companies, such as leak per mile or leak per service, for better comparison between companies?

Answer:

1. Yes, Pipeline Safety has normalized data for better comparison between companies. More specifically for each company, Pipeline Safety has leaks per mile of main as well as leaks per total amount of services. All Pipeline Safety data/information/graphs are considered for display during the Annual Data Report presentation, however, the final presentation is passed through numerous iterations in order to optimize message-content, time-constraints, and an objective/impartial display of the natural gas distribution operators. With regards to leaks, the final presentation focused on the notion that the leaks were being repaired at a rate consistent with the rate the leaks were occurring. Please contact the local Pipeline Safety Supervisor who serves your area should you wish to explore this subject further.

PA PUC Damage Prevention – Terri Cooper-Smith & Kasha Schreffler, PA PUC

Questions:

1. If Kasha doesn't specifically mention, what is the monetary amount of violations given out to date (not necessarily received)?
2. Is there a plan for the DPC to get more current with the AVRs? Currently, AVRs that are reviewed are a year old.

Answers:

1. The total amount of fines levied to date is \$1,234,025.
2. Yes, MIS is still improving our case management system, and we have approval to hire a fifth investigator.

NTSB Recommendations from Silver Spring, MD Incident – Bob Biggard & Sunil Patel, PA PUC

Questions:

1. Where does PA stand on using a ventless regulator, such as the Pietro Fiorentini (PF) regulators, Washington Gas uses, where clearance cannot be met?
2. Need to read the Washington Gas response. They do not believe it was a disconnected vent and reg failure. Washington Gas believes it occurred on customer side of meters, similar to recent incident in Baltimore. Inspection and protection of customer piping is important!
3. Would the use of a thermally activated shut off valve (Teco Fire Bag fitting) at the head of service allow for deviation of any of the meter set location restrictions.

Answers:

1. If referring to Pietro Fiorentini, if the device functions as a service regulator, it must meet the requirements of 192.197, & 199.
2. From past experience with several NTSB investigations, it is presumed that WG had operating personnel as representatives on NTSB's investigative team and had input into the investigation, findings and conclusions. Given that, the investigative team published the final report, which is the basis for the presentation.
3. That type of device would seem suitable for beyond the meter applications; however, it can not circumvent the minimum requirements per code.