U.S. DEPARTMENT OF TRANSPORTATION

PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION (PHMSA)

OFFICE OF PIPELINE SAFETY

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GAS PIPELINE ADVISORY COMMITTEE (GPAC)

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MEETING

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WEDNESDAY

JUNE 1, 2016

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The Advisory Committee met in the Gallery Ballroom, Hilton Arlington, 950 North Stafford Street, Arlington, Virginia, at 1:00 p.m., Paula A. Gant, Chair, presiding.

PRESENT

PAULA A. GANT, U.S. Department of Energy; Chair
CHERYL F. CAMPBELL, Xcel Energy
J. ANDREW DRAKE, Spectra Energy Transmission
SUSAN L. FLECK, Maintenance & Construction National Grid
ROBERT KIPP, Common Ground Alliance
ROBERT W. HILL, Brookings County (SD) Zoning & Drainage
RICHARD F. PEVARSKI, Virginia Utility Protection Services
RICHARD R. WORSINGER, City of Rocky Mount, North Carolina

STAFF PRESENT

MARIE THERESE DOMINGUEZ, PHMSA Administrator

ALAN MAYBERRY, Designated Federal Official

JOHN GALE

MAX KIEBA

SAYLER PALABRICA

CAMERON SATTERTHWAITE

ROBERT SMITH

MELANIE STEVENS

T-A-B-L-E O-F C-O-N-T-E-N-T-S

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P-R-O-C-E-E-D-I-N-G-S

(1:01 p.m.)

MR. MAYBERRY: All right. Good afternoon. My name is Alan Mayberry. I'm the Acting Associate Administrator for Pipeline Safety. It's a pleasure to welcome you all to our Gas Pipeline Advisory Committee meeting today.

The Gas Pipeline Advisory Committee is a statutorily mandated advisory committee that advises PHMSA on proposed safety policies for natural gas pipelines.

The committee was established under the Federal Advisory Committee Act, or FACA. And under FACA, I will serve as the Designated Federal Official today. And chairing today's meeting is Dr. Paula Gant from the Department of Energy.

And I will turn it over to Paula in a moment. Before that I thought I'd go over a few housekeeping issues.

It's good to see everyone today. I

would like to say that, you know, the last person in this position, as you well know, was Jeff Wiese. I spoke with him a little while ago, and he certainly sends his regards.

He speaks of this committee as his, really his fondest memory of his days at PHMSA. So it's a very effective committee, a very important committee. So he certainly misses working with all of you.

Of course, I today have that opportunity to work with you. And I must say, although this is the first time I've done this, I do look forward to working with you while I'm acting in this position. So, you know, today might be a little touch and go, because I am new. But we'll kind of learn this thing together.

So, with that, I will just go through I guess some safety things here. First, regarding if we have an evacuation, we have two ways to get out of this room: the way you came in, and down the stairs, across, to my left.

And then, to my right, if you go out

those doors that you see over there to the right, it leads down to a stairwell that's a different exit from over here. And that stairwell goes to the outside. So those are two ways to leave the building here, in case of an emergency.

I'd like to also take this opportunity to introduce PHMSA staff. As I said, I'm Alan Mayberry, the Acting Associate Administrator for Pipeline Safety. And we'll just, if people from PHMSA would announce their names and affiliation, or department, that would be great. So, start with Sayler.

MR. PALABRICA: I'm Sayler Palabrica. I'm in OPS, Standards and Rulemaking.

MR. GALE: John Gale, OPS, Director of Standards and Rulemaking.

MR. SATTERTHWAITE: Cameron Satterthwaite, Standards and Rulemaking.

MR. KIEBA: Max Kieba, Pipeline Engineering and Research.

MS. STEVENS: Melanie Stevens, Office of the Chief Counsel.

MS. WHITE: Nancy White, Senior Policy Advisor.

(Off microphone introductions.)

MR. MAYBERRY: And then we'll go through introductions of the Committee present here. Starting, we'll go right here. Andy?

MEMBER DRAKE: Andrew Drake with Spectra Energy, representing industry for the gas pipeline group.

MEMBER HILL: I'm Robert Hill, Brookings County, South Dakota, representing the public.

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount, North Carolina, representing industry.

MEMBER KIPP: Bob Kipp, Common Ground Alliance.

MEMBER PEVARSKI: Rick Pevarski, Virginia 811, representing the public.

MEMBER CAMPBELL: Cheryl Campbell, Xcel Energy, representing the industry.

MEMBER FLECK: Sue Fleck, National

Grid, representing the industry.

MR. MAYBERRY: Okay. Thank you very much. You all should have your agenda today. Today is the Gas Advisory Committee Meeting. Like I have mentioned, we'll go today until 4:30.

We have two items, one on the voting protocol that should go fairly quickly upfront. And then the main feature presentation will be on the plastic pipe rule that we'll be seeking the committee's guidance on.

You'll notice on the agenda that there is -- we made sure to insert the part about the public discussion. So at the end of the committee discussion we intend to open it up for public comments at that point. And we will do everything we can to get you out of here at 4:30 p.m. today. And, you know, run it as efficiently as possible.

Tomorrow, as you know, we'll have the joint committee meeting, and the Gas and Liquid Advisory Committees. And tomorrow we start at 8:30, and then we'll go until it's over. But

I'll tell you, my call is, let's end it at 4:30.

I know it's a pretty meaty discussion on a couple of rules there. Or one main rule that has a variety of topics in it related to OQ, instant notification, a number of other items. But it should be a nice robust discussion on that tomorrow as well.

And there will be a vote tomorrow as well. A vote today on the gas, on the plastic pipe rule. And a vote tomorrow on that miscellaneous, I sort of call it the miscellaneous rule still.

And then tomorrow another major feature will be just the briefing on the gas transmission rule. So, we'll do that toward the end of the day.

And then finally, on Friday, we have the Liquid Advisory Committee meeting that will be here as well. We have kind of a light agenda for the Liquid Committee. There are no items to vote on. But we do have a number of briefings that cover everything from stakeholder

engagement, re-authorization, oil spill response plans, and the like. So, the Gas Committee members are certainly welcome to stick around for that as well.

A little bit about just, you know, decorum and behavior. I don't think I need to remind you. But, you know, certainly as we proceed we are, you know, it is a Federal Advisory Committee meeting. And we're just asked to preserve order and decorum, you know. So, let's just be civil. And sort of, you know, make sure that we maintain a sense of professionalism as we discuss issues that I know, having been in the industry for, gosh, over 34 years, it can become quite interesting with the emotion that can build up on some issues. But I ask that we maintain that sense of civility.

And with that, John, have I covered about everything? I think I have upfront.

It's a pleasure for me to turn it over to the esteemed Dr. Paula Gant, who will chair today's meeting. Paula.

CHAIR GANT: Thanks, Alan. Well, that's a pretty big charge to remain esteemed, and to end this meeting at 4:30 But I'll do my best. And knowing that you've all be admonished to behave yourselves, with this rowdy crew. I'm looking over at the side of the table particularly. So, but I'll be watching over here as well.

A couple of things to just note for the record. I appreciate the time that you all are taking to be here. I recognize the significant commitment of time and energy to travel that it takes.

I personally am here because I have been impressed with the value of the dialogue that has been built up around this table over a number of years, and what I think it contributes to the public in more quality rulemakings coming out.

And that value arises from people like you coming to this table and listening intently, and contributing robustly, so that the policy

that is made by the Department is better -- the public is better served by it.

So, thank you for what you do, and for the opportunity to be a part of this. I think it's an important investment that we're all making. And I think that Jeff left behind a good legacy in that regard. And it's nice to be able to contribute to Alan's efforts.

On some housekeeping notes. The meeting will be recorded. A transcript will be produced for the record. The transcript and all the presentations will be made available on PHMSA's website, and on the eGov docket at www.regulations.gov. The docket number for this meeting is PHMSA-2016-0032.

A reminder to everyone in the audience, as well, to please mute your phones and other electronic devices so that we are not disturbed. And I'll ask everyone who speaks today to make sure that you introduce yourself and your affiliation so that your comments can be acknowledged in the official transcript. And

also for others in the audience who may not be familiar with you.

If you have a question or a comment, please set your tent card up on its side, and I'll do my best to pay attention to that around this very big table.

Per the rules for the Committee, a quorum is established if the majority of the members are in attendance. And we do have a quorum here today. So that will provide for the voting that needs to take place today.

So, those are our opening bits of guidance. Alan has gone through the agenda. And we will get rolling with one more comment from Alan, as well as -- is there any comment or observation or question that members of the Committee would like to put forward before we get rolling on the agenda?

Okay. And as Alan noted, at the end of each section I'll be turning to the public and providing an opportunity for public comment on each of these items before we go to a vote.

MR. MAYBERRY: Thanks, Paula. One more item. And I didn't cover it on the agenda, but tomorrow both combined groups will be addressed by Marie Therese Dominguez, the PHMSA Administrator. She will also be here today. She'll be here somewhat after -- definitely after the start. But at the appropriate time, when she shows up, she'd like to say hello and a few words.

So when Marie Therese, the Administrator, shows up, we'll have a few words from her tomorrow, or today. Tomorrow she will, you know, give wide-ranging remarks covering, you know, where we are with re-authorization, probably a bit on PHMSA 2021, related to a reorganization effort we have underway in developing our strategic plan.

And, you know, with that, I just might add, there is a lot going on at PHMSA now. Not, you know -- of course, we know a lot of the rules that you're familiar with, from the gas transmission rule that we'll be talking about

tomorrow, hazardous liquid rule, a variety of other rulemakings.

But we are steadily working toward a direct final rule -- or interim final rule, I beg your pardon, on underground storage. And so, that will be coming. That's something we're not really presenting to the committees. But if you have any questions as we go forward, I'd be glad to discuss that. But that's kind of a big issue that's in play right now.

Other issues, like LNG, we had a public meeting last week. So we're looking to develop a rulemaking on that as we go forward. But that's kind of a quick smattering of some of the -- a couple of things that are going on that make life interesting at PHMSA these days. But anyway, with that I'll turn it back to the Chair. Thank you.

CHAIR GANT: Thanks, Alan. So, we're going to turn to our first agenda item, which will be having Cameron Satterthwaite. Kind of got that right? Okay. I'll have it right by the

end of the day. Thank you, Cameron. And he's going to walk us through the voting protocol.

MR. SATTERTHWAITE: All right. Getting started. And just for the record, I'd like to give a nod to Cheryl Whetsel. She was unable to join us today, but she's okay. She wishes she was here. Of course, a lot of you all have seen a lot of the emails that she's sent. She's done an awesome job, as she always does, behind the scenes and, you know, doing what she does.

This presentation is basically a presentation to kind of talk about the voting process. And we'll go right on in.

Of course, the vote at hand right now is on the plastic pipe rule that was published on May 21st of last year. Tomorrow, of course, will be the OQ rule. And I'm going to read to you all a little bit.

Of course, when a decision or recommendation of the Committee is required, the Committee Chair will request a motion for a vote.

So, basically, as we do this presentation today, Max Kieba is going to do a presentation. He's going to present an issue. He's going to give background on that issue. He's going to share some of the comments that we received on that issue.

And after we step past that, there's going to be some notes as far as where PHMSA stands on a couple of issues and some of our recommendations. And at that point there will be a Committee discussion. And then at that point we'll also have the public's input.

And then if you all want to move forward with the vote, then there will be a vote that can take place. That's what we have there. It says, any member, including the Committee Chair, may make a motion for a vote.

A quorum, of course, is required for a vote, which is established. A majority of the current members of the Committee must be present at a meeting to perform the Committee's statutory duties. And I think we're at that point.

This is some of the language, Committee action. Members consider each proposed rule and the Draft Regulatory Evaluation. The motion should include language from the statute, 49 US Code 60115, to indicate the appropriate committee has carried out its responsibilities.

Motions must originate from, and be seconded by, members of the appropriate committee. Today should be basic, because there's only one committee voting. But when we move to two committees we'll have two motions. And that will be lots of fun. There will be a lot of motion. Okay. Never mind.

Measures impacting both gas and hazardous liquid pipelines must be voted on separately by each committee. And this is some sample language. If you were to agree, if the committees were to agree on it, then this is the language that we would use.

Where you see Technical Pipeline Safety, a lot of times we'll just go with the Liquid Pipeline Advisory Committee or the Gas

Pipeline Advisory Committee.

But for the sake of it, "the Technical Pipeline Safety Standards Committee finds that the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost-effective, and practicable." So that's if you were to agree with what the proposal was, as proposed.

If you were not to be in agreement, then this is the language that would be used. The Technical Pipeline Safety Standards committee finds that the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are not, or cannot be made technically feasible, reasonable, cost-effective, and practicable.

And this is the third option. And this is if you were to propose a change. And this is what we've seen a lot in a lot of our meetings.

And basically the language here would go, "the Technical Pipeline Standards Safety

Committee finds that the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost effective, and practicable if the following amendments are made."

And that generally would be followed by a list of the amendments agreed upon by the committee, or a reference to a slide in which changes were discussed.

Sometimes, you know, this language right here might be tweaked a little bit if we're voting on a specific issue. So we'll say, the proposed rule regarding bubble gum and scotch tape. So, you know, we'll insert that, and then we'll put in the amendment after that.

And of course, the verbatim, this meeting transcript serves as the Committee report, unless another document is provided by membership. But the transcript that is generated, we have a court reporter here. And everything is being recorded. And all the transcript will be placed in the docket for the

public record. And that will serve as the report from this Committee.

And that's all I have. Are there any questions? I mean, later on we'll also bring up the slides with the appropriate language, as we get into the votes. Okay. That's all.

CHAIR GANT: Thanks, Cameron. Any questions from the Committee on the vote? Okay, great.

We'll move to Agenda Item Number 2, which is a briefing on the proposed rulemaking on pipeline safety with regard to plastic pipe. Max Kieba is going to give this presentation.

MR. SATTERTHWAITE: I'm going to do a little intro for Max going in. Are we on? Or I guess we're trying to figure out what's up with the speakers.

Okay. One second. All right. There we are. Okay. We're going to just jump right into the presentation. I'm Cameron Satterthwaite, Office of Pipeline Safety, Standards and Rulemaking. Myself and Max Kieba

will be giving this presentation.

I'm just going to do the opening. And Max Kieba, who's our subject matter expert representing the team will be taking on the rest of the presentation.

This Notice of Proposed Rulemaking was published on May 21st, 2015. The Federal Register citation is there. The comment period closed July 31st of last year. We received comments from 39 entities, including operators, trade associations, manufacturers, private citizens, consultants, government entities -- we're going to work through this. Give him a second to --

(Technical difficulties.)

MR. SATTERTHWAITE: All right. Okay. And the pipeline service company. Okay. Much better.

The focus on this rulemaking is gas. That's why we're staying in Part 192. And this is only a Gas Pipeline Advisory Committee meeting.

Of course, the impacted areas, the transmission, distribution, gathering lines. And of course, plastic pipe. The rationale for the rule, a lot of this was based on staff recommendations. We received several petitions from the folks listed here.

And here's a listing of the issues. And we kind of broke it out this way. We have tracking and traceability, design factor for polyethylene, the expanded use of PA-11, incorporation of PA-12, risers, fittings. Some issues on plastic pipe installation, repairs, and some general provisions.

The way that this presentation is structured, we're going to go over pretty much each issue. And when we get down to the end, that's where we'll move on to other areas.

Now I'm going to give it over to Max, and we'll start, jump right in with tracking and traceability.

MR. KIEBA: Thanks, Cameron. Thank you, Chair. Thank you, Committee. Once again,

I'm Max Kieba with our Engineering and Research group. I'm also the plastic pipe team lead. And it is truly a team. In addition to Cameron and all his folks on the rulemaking staff, our technical folks include -- I want to acknowledge Vinnie Holohan, Engineering and Research, Harold Winnie, our Central Region, also one of our inspectors, and on some of our standard committees.

Bryan Kichler is with our Training and Qualifications Division in Oklahoma City. So he helps train a lot of our federal and state inspectors, particularly in this area. And then Chris McLaren you met already here, with our state programs group and our DIMP coordinator.

So the old adage, I guess, if you like what see, you know, compliment the team. If you don't like what you see, well, complain to me, or I guess Alan. So that's it.

So yeah, let's get started. Tracking and traceability I think it's fair to say was the lion's share of the comments we got. But going

into this rule, the primary issue that we saw were not all operators were having consistent data to identify systemic issues.

So, we've had DIMP since 2009, 2010 or so. Part of that is material and location. But we just saw that folks just weren't quite getting it. And maybe part of it is we weren't providing effective guidance.

So, and another issue we see out there is, when incidents do happen, it's really difficult to find out either where else that fitting or the pipe, or whoever fused that joint, where else they were working that given day.

We've seen some incidents, I could at least point back to Rancho Cordova in 2008, where there was a piece of plastic that went in between two joints that wasn't even a gas pipe, it was yellow. But then when we asked the operator, "where else was that crew working?" they couldn't give us an answer.

More recently, East Harlem. A lot of folks probably know that one. But some fusion

qualification issues, again, where else this issue was occurring. So we definitely have a history of incidents where this has occurred.

And I also want to point, we're trying to follow a lot of the latest standards going into play. So, since 2012, most of the ASTM standards applying to these different materials have worked into this tracking and traceability standard we'll talk about here.

And I would say, up to now, I think PHMSA should take some of the blame, right? We were at 1987 and the '99 version of 2513 for the longest time. Finally, last year, we got to 2009. Now we're trying to at least get up to the 2012 version for a lot of these. And we're still three years behind.

But we're trying to get up more current with the latest standards. It's something we keep hearing. So this is one of the initiatives to try to get there.

So, our proposal as part of this is to maintain tracking and traceability information,

as defined in 193.2. We'll talk about some comments we got on the definitions. And also to be consistent with the definitions and requirements in the applicable standards.

So, just to take a step back, I wanted to, for those that are newer to plastic pipe, just explain how pipe is generally marked today. I put 2513-09a up there just because it's the current version that's incorporated by reference. But this particular section hasn't really changed much for a number of years. And this is still pretty much in the latest standard.

So, on your print line, and I have some examples here if anyone wants to see it. We have a few pictures up later as well. But you have a number of information on that print line: pipe size, manufacturer, et cetera.

There's an example at the bottom. But you'll see, like in this example, it strings along an entire length of pipeline. Typically, you know, two to three feet distance. It depends. But that's where it's gone

traditionally.

So what happened? So, in the '12 version. And, again, this is the version that's proposed. This is 2513. But again, this is a PE-only standard right now. But in this rule we also propose the '12 versions of PA-11, PA-12, and many others.

So, in the '12 version it incorporated 2897, this tracking and traceability standard, which incorporated a lot of the same information from the print line into a 16-digit code, alphanumeric code. And up on the slides, out of those 16 digits you have two that are component manufacturer.

Probably the meat of what you're going to get is in that manufacturer's lot code. That's going to talk a lot about what the material is, perhaps the temperature codes that were traditionally on your print line, and other aspects of the manufacturing process.

And then, yes, there's a material component type, size, et cetera. I provide an

example at the bottom there. That's in the standard itself.

But out of that 16-digit, if you're looking at it straight, you're not going to know what that means. But it can correlate to an, in this case, an inch-and-a-half IPS PE2708 material.

So just to give you an idea, again, transitioning from the longer print line into a shorter format. So that's one part of the 2897.

The other part we got on this rule was the whole permanency of these markings. So in the standard itself, and this is right out of 2513, we pointed to the standard for the permanence. And at least for pipe it gives some definition or explanation of what permanence is.

Effectively, it can only be removed by physically removing part of the pipe wall. So traditionally, they've used an indent-type printing that protrudes through part of the wall. And yes, there's some ink that goes onto it.

Over time, maybe that ink will go

away. But you can still see that indentation. So that's the permanent aspect for, at least, again, in the standard itself.

And then, at the bottom there, people seem to forget this part. But there is a part in there that calls for a records piece for the manufacturer that must maintain such records for 50 years or the service life of the pipe. Why I'm bringing this up is because this also is tied into a NAPSA resolution that we got for making markings permanent.

Now, on the fitting side it should be acknowledged that, yes, fittings do not have that permanent language. It's really difficult to indent printing on fittings themselves. Right now that's all that we have in the standards for fittings. Just that it should be marked on the body of the hub.

It does have that 50-year design life for the records piece, again, just on the manufacturer. Nothing in there about what the operator is supposed to do. And then it does

have a note that it only applies to fusion fittings, not mechanical fittings.

So that's some of the comments we got in, as well. We had this permanent word that was tied to the standard. And it is a little bit different on pipe versus fittings, at least what can be done.

So, this next set of slides. One, I want to acknowledge AGA had a tracking and traceability workshop. You can go to that public link. And these next set of slides are actually going to be from the Plastic Pipe Institute.

Randy Knapp is actually here. So I want to acknowledge Randy for a lot of these slides. But to me, I think that this helps explain at least where the industry is currently going for marking, and maybe some of the challenges that are coming up, particularly with this permit aspect.

So, again, one of the most common methods are the indented printing. It is abrasure resistant. Most would agree it would

follow -- it would satisfy the permanency.

But it's not well-suited to that barcode. So that 2897, you see an example there. And again, I have examples here. But you have that 16-digit at the bottom. And then you have the barcode right up top. It's not very well-suited for barcode to do that indent printing. And it's also difficult to manage. So you see, any time a date changes, you're changing at least two digits, sometimes three digits here.

Here's another version that's probably the most commercialized method. It's ink jet. And here polyamide requires some surface treatment as well. And then it has to adapt to varying conditions, sizes, and line speeds.

I think we're losing the mic again.

Okay. Laser. So some folks are doing laser etching now. It's still being investigated. It has a small footprint. It does protrude a little bit into that wall, to an extent.

It is more capital intensive. So when

we bring up the question on costs, it is a little more capital intensive on the manufacturing side. Some can argue, does that really go to the operator, and ultimately the customer? But it is more capital intensive on the manufacturing side.

Some are also doing this UV-cured ink. It adds a process step. Adhesion can be an issue. So, again, the permanence or durability of that marking. It does have faster dryer times.

Labels. You'll probably see labels more common on fittings. And I have just one example here where typically you'll put a label on a fitting. Some are starting to do an RFID. I would say that's a newer technology. It's difficult to implement on pipe.

But, again, this is just acknowledgment that the industry has gone in a number of directions to try different options.

So, for smaller footprints, if you just don't have physical space. I mean, I provided one example which is actually a pretty,

relatively large-sized fitting in the grand scheme of things. But you can imagine your EFVs or others are, get much smaller size type fittings.

So typically for those it's really difficult to get it onto the actual fitting itself. So typically they'll put some kind of tag. But I think most will agree, it probably doesn't take all that much to rip off this tag. So is that permanent or not? Those kind of things.

Here is just an example, again, the same fitting I have here. So at the top left of there, and this is a fitting. The top left is pretty much your standard print line through the years. At the bottom is your bar code and your 16-digit. And you also see a QR code. Multiple ways to put it on a label. So that's just what's been happening from a manufacturing process.

So, here are the comments we got in. We did get a number of comments that were overall support. A few comments we got were suggesting

to drop it entirely. The concern there was to pursue a separate tracking and traceability rulemaking for all material types, not just plastic.

A few of the commenters did claim that they felt the requirements would be economically significant. And that's from the overall tracking and traceability part.

For the permanence part, we got comments that markings -- when the industry and the standards transitioned into this barcode, this 2897 tracking and traceability, the intent at the time, or overall, those markings are primarily to help capture that information at installation.

Some inspectors would probably argue with that point to an extent, whereas, you know, down the road, if you have an incident, or you dig up the ditch, you want to find out something about the pipe. And if you don't have the records somewhere, what do you rely on? You rely on what's printed on that pipe.

Others on the permanence suggested that permanent records of markings could potentially be considered equivalent to permanent physical markings. So they provided some alternative language. Instead of using the word "permanent," perhaps markings must be "legible, visible, and/or readable."

Some did throw out numbers on, hard numbers on -- we had some that suggested we just put out a number of 20 years, versus some generic permanent. Others just said, up until the time of installation.

So the thought there is the manufacturers are required to at least make sure that either the printing on the pipe or the fitting lasts up until the time of installation, when the operator can put it in the ground, somehow capture that information, and from there transition it into whatever data capturing and analysis mechanism that the operators use.

A few did comment that it's potentially burdensome to small public operators.

That's on the permanent piece.

For F2897 itself, versus the definitions we proposed in 192-3, we had a number of comments that noted some differences between the two. So we got comments to redefine tracking and traceability only to what's required in that standard. And if there are any additions that PHMSA feel is needed, follow the standard development process.

From an overall timeline, the general feeling from a lot of the commenters was, if we can't drop this entirely, pursue a separate rulemaking. There was a suggestion to recommend some kind of phase-in approach. We got implementation timing ranging from two to five years total.

So, on behalf of at least the staff, some possible recommendations, or possible changes. Definitely for the definition itself, to revise the definition to more closely match what's in F2897. I think Cameron has a link there of some examples.

On the permanence expectations, one approach is to just defer to the listed specifications for pipe. And then somehow we have to do something for fittings themselves.

And for fittings, must be present and recorded at the time of installation. Or, again, we have to figure out, does pipe have different language, or fittings have different language.

And then, for a compliance timeline, the staff felt it is reasonable. Even though a number of manufacturers are already doing something that has the 16-digit code on it, a number just aren't there yet, partly because they're not required to do it. Certainly not from the regulations.

There might be some operators that require it in their purchase orders. But there's just a number of manufacturers that just aren't there yet.

So, from a compliance timeline, one thought is to allow marking requirements, delay the implementation for one year, just to give

manufacturers some time to figure out the marking piece.

For the recordkeeping, for the operators, give the operators two years before the recordkeeping requirement would be required. And certainly, as part of that, we got some comments that perhaps we can do some task group meetings in between.

Alan, do we continue on? Okay. Would you like to say something? Okay. I'm just making sure. If anyone doesn't know, here is our Administrator.

CHAIR GANT: I was going to let you finish, Max. But it would be very appropriate to welcome Administrator Dominguez here. She was able to stop by to say hello. She's going to join us for an extended period tomorrow. Administrator, would you like to share any thoughts with the group today?

MS. DOMINGUEZ: I'll just say a quick hello. And it's nice to see all the Advisory Committee members. Thank you all for your

participation. And thank you all in the audience. We greatly appreciate your participation as well.

As you noted, Paula, I will be here tomorrow with the joint committee meeting. I look forward to sharing some comments then, at that point in time. But just came in to sit in for a portion of the discussion this afternoon. So, thank you.

And a welcome to Alan as he leads these advisory committees over the course of the next couple of days. So, thank you.

MR. KIEBA: All right. So I think, if I'm not mistaken -- yes. So, as Cameron said, we thought it would be helpful to break this up into chunks.

So, the first piece is tracking and traceability. So, here's the proposal from the staff for some options. And then I guess I defer to Cameron where we go from here.

I think Cameron has an example of at least some language for the definition. I don't

know if we have language for some possible changes of the permanence language based on comments. But I defer to Cameron to take it from here.

CHAIR GANT: If we could, before we go to some of Cameron's suggestions, take any questions or comments or suggestions from Committee members? If you'll raise your tent or your hands? Ms. Fleck.

MEMBER FLECK: Thank you. Susan Fleck with National Grid, and obviously representing the Gas Committee. I think most of the concerns that local gas distribution companies have, have been mentioned by Max. But I think it bears some reinforcement.

And first off, I think it's important for us to note -- well, for me to note, that we are fully in support of the concept of tracking and traceability. We think it's the right thing to do. And I think there's very few people who would argue that it's not important to know where specific assets are and to be able to find them

in the event that something happens.

And with that said, though, I think it's a little premature to be putting a rule this comprehensive in place in such a short timeframe. It just feels like it's a lot to get done in short period of time. It feels like a more significant rulemaking. Because of this, companies like National Grid, we're putting in 500 miles of pipe a year, actually just in replacement. Probably more like 600 miles a year.

And just the sheer volume of information that has to be tracked and traced, to me, tells us we're going to have to build new systems. We're going to have to build new procedures. We're going to have to hire people. We're going to have to train people. And the timeframe to get that all in place seems a little bit short.

So, my suggestion would be to pull tracking and traceability out to potentially give the plastic -- you know, get the plastic pipe

rule passed and work on that until we get some of the issues understood a little bit better.

So that's where I'm going to start. And I have some other issues. But I'll stop there for now.

MR. KIEBA: Can I respond, or at least, I don't know if you -- the process to go through. I guess with the plastic pipe team, I guess we were confused on this whole, "it's going to cost more, it's going to be more intensive."

To be quite honest, I think part of that was maybe some folks were thinking we're requiring everyone to GPS/GIS everything, maybe have barcode readers. And that certainly wasn't the intent of this rule.

Because you have to imagine, even some of your municipals, you're lucky if they have a computer, let alone, they're not going to have barcode readers. So the thought was, at a minimum, they could at least record that 16-digit number, even if it has to be the paper copies. And somehow they use that as their normal record

keeping, what they already do for print lines.

So, I guess we were just confused on that aspect, on where operators think it's intensive. I mean, I get it. If you're adding anything into your already comprehensive data capturing mechanism. But again, I think that was where we were confused on the whole cost and, you know, the intense burden of this.

CHAIR GANT: Alan.

MR. MAYBERRY: Okay. Thanks, Sue. I was curious. You had mentioned the timeframe. Did you mention that with the concern over the time of implementation? Was that where you were coming from, as far as how it -- I guess you'd mentioned timeframe.

MEMBER FLECK: Yeah, having it fully up to speed in two years, to me, the recordkeeping requirement seems, I wouldn't say impossible, but highly unlikely.

For us, every one of our systems, because we don't do anything on paper really anymore. Maybe in some of our smaller areas. We

do it in systems, because that's what our regulators expect. And our systems would have to be updated.

And I don't know if you're ever updated a system like SAP. And it doesn't happen in a year. It takes multiple years, and many millions of dollars. Because it's reaching back to a lot of other systems. It's way more complicated than it seems. It doesn't -- I just don't think it's doable in two years for a company like National Grid. And I don't think I can keep it on paper. I really don't --

MR. KIEBA: How about five years? Because that was one of the proposals, is eventually phased implementation up to five years.

MEMBER FLECK: I don't know. I'd love to hear some other input from somebody other than me. But it just feels like -- I just know if I go back to my IT department and say, "you have to update all our work management systems and include this," they're going to laugh me out of

the room if I say it has to be done in two years. I'm sure of that.

CHAIR GANT: Thanks. Rich, and then over to Cheryl.

MEMBER WORSINGER: Hi. Rich Worsinger, City of Rocky Mount. I echo Sue's position on this. We also support this, feel it has a lot of merit, and agree with Sue's comments.

Would like to add another one to it, though. We would like to see this made its own rulemaking and set up to include steel pipe. There's value to track steel pipe also. So we'd like to not only see it apply to plastic, but be expanded to include steel.

We also have concerns about cost. There's a lot of American Public Gas Association's small members who do not have a way to track this. And having it on paper, if you had a looseleaf book full of papers, I don't know that that's going to help you easily find something.

I think that if we can slow down a little bit on this also, it can allow some of the various vendors out there that could develop something. I don't know, Sue, that many of our companies use SAP. But hopefully somebody can develop a poor man's way of tracking this.

CHAIR GANT: Thanks, Rich. Cheryl.

MEMBER CAMPBELL: I agree that I am fully supportive of tracking and traceability, having been on the wrong side of this, looking for equipment. So I'm 100 percent in agreement.

Regarding the timeline, I agree with Sue. Two years, I mean, we're right in the middle right now of installing SAP. Unfortunately, I'm also right in the middle of upgrading of my GIS. I've been working on both of those for three years. And GIS goes live in ten days. And we're more than a little nervous about that. And that's an upgrade, right? But we have been working on it for quite some time.

To Sue's point, all these systems are so interrelated it's very, very difficult to

bring them all along at the same time. And it takes a lot of thought and a lot of planning.

So, frankly, I think five years would be a -- I think it's doable in a five-year timeframe. Companies can start working on it, get it built into their technology plans.

I mean, we have a technology plan and a timeline, and this is when we're going different things. And it allows us to very thoughtfully bring everything aligned together. It also gives us plenty of time to work on procedures, training our people in the field. You know, there's a long list of things that have to change when we do this.

Having said all that, I also agree with Rich that I'd like to see it expanded beyond plastic. This is not just a plastic pipe problem with tracking and traceability. I think it's something that we should be thoughtful about, beyond just our plastic infrastructure.

MR. KIEBA: Yes, and that's a good point. And if it hasn't been -- we used to have

a slide. But for anyone that aren't familiar with that 2897 standard, it actually is a standard for both plastic and metallic, other components.

I think part of the problem is the metallic folks just haven't been wanting to play ball even close to what the plastic folks are doing. So, I mean, again, I defer to what the committee ultimately decides, and our leadership certainly.

But there's one approach where you could start here for plastic, and potentially expand it for metallic if this is the go-to standard. Otherwise, I don't know where to go from here on realistically when we're going to see another rulemaking down the road.

Another thing worthy of noticing, noting, is on my earlier slides this is integrated in so many of these other standards we're proposing. So I can't see a clear way where you could pull out tracking and traceability and still keep the 2012 version of

all those standards.

That's effectively saying we're back to 09a for a few years. And I don't what you do for PA-11, PA-12, honestly, unless you say, "Okay, go to 2012 except for those." I don't know if that's an approach. But just keep that in mind for an impact standpoint.

CHAIR GANT: Thoughts from the table on the connection between the 2012 standards and the references to this new requirement and how that might be addressed?

MEMBER CAMPBELL: Can you say more -- can you provide a little more information on that, Max? I mean, I'm just trying to wrap my head around it more.

MR. KIEBA: Yeah, if you look at all the PA-11/PA-12 slides, the marking, what I showed you there for 2513, all of them essentially have that same language, maybe slightly different in some of those others.

But, you know, as part of this rule we proposed some 15 to 20 different standards. A

lot of those, you know, we have the suite of the new PA-11/PA-12. Part of that is to finally get rid of '87 and '99 for non-PE plastics.

We want to get rid of that, those older ones. So the thought there was go to the PA-11/PA-12. And, yeah, we started with the 2012 version to try to bring it up to speed. But all those pretty much had the same language on tracking and traceability.

Not to mention, with some of these standards, they have some 20 other applicable standards within them for fittings. And a lot of those are also incorporating tracking and traceability.

So, again, it's just complicated. When you point to a standard and you say you have to follow the standard, but then you have so many pieces on there that talk about this tracking and traceability aspect of it.

CHAIR GANT: Max, could you give us an example of how tracking and traceability is referenced in the standards?

MR. KIEBA: Yes. So I gave you some -- let's go back to this earlier slide. But, again, I'll just use this example from 2513. So here it is.

So, basically it says, in addition to -- so, again, this is, I want to say -- sorry, it's Section 7 of the standard, which, again, this is still the same Section 7 in the 2313-12 version.

But then you have a new section that says, in addition, you have to meet the 2897 aspects. Again, it's very similar in the 12AE-1 version for PE. But it's also very similar in the PA-11/PA-12 standards, and so many other plastic standards.

So, again, the standard points to, in addition to -- and that's one of the reasons, too, you'll see, on the example pipe I have here. What folks always don't know either is -- none of the standards actually require you to put the version number. Most pipe will just show 2513. Except there are some out there that actually, I

think one of these, has 11c on it, because that's the version right before tracking and traceability come into play.

So you might see some that actually print those as 2513-11c, just to make it clear that they don't follow tracking and traceability.

When you got to 2012, that's where tracking and traceability came into play. And typically what happens -- and help me out operators. But typically a lot of operators or manufacturers will say meet the latest standard, in addition to clearly whatever is required in the code.

So it has been intensive, up to now, to go both with a 2012 or later version, or even '11. And at least as of a couple of years ago, always having to go back to 1999 version for 2513 that meets the code.

We're a little closer now between 09a and 12. But I think there's just a big jump we had in '12 that I think is better, and even the -- and the hope is we can get over this hump of

these older standards. And eventually we'll get into a standard update process and we won't just constantly be updating to the latest standard every two years.

But, again, if we don't go to tracking and traceability now, we have to figure out what we're doing for this piece. Does that mean we have to go to 09a?

And I don't even know what it means from a rulemaking part. Because we didn't propose the '11 version, or anything else before '12. So I just don't know what we do from there.

MR. MAYBERRY: Cheryl and Sue and Rich, just from a practical standpoint, I was curious, and really it's just to raise my level of awareness on this. I presume operators are on the committee, the STM Committee, so I imagine there was some level, there was a level of acceptance of the membership on that standard. And certainly, I would also extrapolate, you know, that certain level of implementation as well.

And certainly, you know, some operators are already doing this. A number of operators are already doing this, I would take it.

But what's the main issue? If it's a standard I think that was developed under consensus, what's the -- I mean, as a regulator, I'm left to think, well, if it's an acceptable standard it's really an implementation-type issue, you know, the phased in, the timing that we're looking for. Is that kind of the right way to look at it?

MEMBER CAMPBELL: I think that's correct. I don't think anybody's got a problem with the ASTM standard that I'm aware of. I think it's really just, how do you get from there to implementing it and integrating it into a very already complicated process?

I mean, it sounds easy, right? I'm going to go get a coil of pipe, and I'm going to put it in the ground. And I'm going to record the number. And everything should work great.

But in practice, it's not that straightforward.

MEMBER FLECK: Yeah, I think when you consider all the nits and gnats of how it can -- what we're really asking for here is more time. We're not saying rewrite the rule. We're not saying it is not appropriate.

We all agree, conceptually this is absolutely the right thing to do. We even recommended it should go beyond plastic and should incorporate other materials. So, we're not against that. It's just getting it done.

For me, I'm going to have to rewrite a bunch of codes and standards. They go through a rigorous approval process within the company. I'm going to have to get people re-operator qualified. Because if part of the job of installing pipe is capturing this information and putting it into documentation systems, that becomes part of our Op Qual Program. People have to know what to do and how to do it.

And then we have to, you know, spend the money on the systems, take the time to get

those in place. Then we have to back to all of our -- I have eight different rate plans. I've got to go back to eight different commissions and ask for permission and get funding.

It's just more than a -- we're just saying it's more than a two year program. Maybe for a smaller company it isn't. But for a bigger company, I think it is. So, conceptually we're in agreement. We think we need a little more time to make it happen, I think is where we're all coming from.

MR. KIEBA: So, I guess it goes back to this last point. If we change marking, again, that's what's required of the manufacturers. So give the manufacturers some time.

And what I've been seeing, this is kind of a moving target. So, if we at least figure out, okay, how exactly are we going to mark the pipe? And we can mark it in a year. And then if we change this recordkeeping, a little bit longer, does that seem a feasible approach?

And in the meantime, again, I think some comments we got is, let's form some -- well, we can't call them advisory committees -- committees, technical committees to get together to talk all aspects of how would an inspector see it. I think we should bring who wrote this standard, to say what is the intent of this standard? If there are any issues in the standard, how do we clarify or add some notes, whether it's guidance in a standard, which I prefer to go through the standard process. Or if there's guidance PHMSA needs to come up with, I think we can do that. But I think that's a reasonable approach, too. Kind of in line with what the AGA tracking and traceability workshop did. I think that was really good to bring everyone together to talk about some of these nuances. So that might be one approach.

CHAIR GANT: Rich.

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. A question of Max. I don't quite understand how delaying tracking and

traceability would jeopardize approval of PA-11/PA-12. If you could elaborate on that. And also, just another question related to that. If we're going to expand this from two years to five years, would that delay PA-11/PA-12 until the end of that five-year period?

MR. KIEBA: So, I don't think it would delay the other parts of this code that talks about the -- so for PA-11 going up to six inch and 250. But it would affect the standards you're incorporating by reference.

So, I think PA-11 and PA-12 would still have to follow the '99 version of 2513. Because that had all material types. I don't think you could say you can follow the 2012 version of PA-11/PA-12. So, our intent was to have all the material specs by material.

So, again, because right now you can do PA-11 up to 200 in a code. But they still have to follow the 1999 version of 2513. It's a really antiquated standard. And it's painful for a lot of people, I think, to follow an old

standard with a new one.

So, I think that's part of the -- again, I don't think it will impact going to PA-11 or PA-12. But it would impact the standards you incorporate.

CHAIR GANT: Sue, do you have another question?

MEMBER FLECK: I had a question on marking. But if somebody else has comments on tracking and traceability --

CHAIR GANT: I'm sorry, Andy, I didn't see your card. Andy.

MEMBER DRAKE: Andy Drake, with Spectra Energy. I think what we hear is kind of a building consensus here that this makes sense. And it does make sense. I think tracking and marking makes a lot of sense.

I do think that the timing issue seeming to make sense to me. We don't have any plastic pipe. But I think it does take a lot of time and energy to get these systems ramped up. And you want to do that well to meet the intent

of what you're trying to do, not just create a bunch of paper that you can't access. That doesn't help anybody.

I do think the conversation about extending it to other materials is logical. But I would caution us, or at least be very deliberate to vet out. The scope of this was intended to be plastic pipe. And the manufacturers that were involved in the discussion were plastic pipe manufacturers.

So before we extend it to other manufacturers I think we need to be cautious to extend the conversation to them. Because I can tell you, that's not how we mark steel pipe. I mean, it just isn't how steel manufacturers mark pipe. And we're going to have to be inclusive of them to figure out how to do something that would accommodate how they actually work.

So I'm not opposed to that. I just offer that as a caution. I think if we're going to extend it, I think that's a good thing. We just need to vet it out so that we get the right

audience.

Maybe we stage it, and do plastic and then steel separately, because they're two different sectors that we're --

MR. KIEBA: Yeah, no question either. I think we're all clear. If it would extend to steel, that would have to be a separate rulemaking either way.

It's the question of whether you point to this one as a start, or something completely different. But yeah, no question, we can't make this a steel rule now.

CHAIR GANT: Alan.

MR. MAYBERRY: Yeah, just to reinforce that. I would agree. I think we need to stay with plastic. That's the topic at hand. And you have to start somewhere. Here it's convenient. There's a standard that addresses it. And so, hence the -- I think we stick with that.

Certainly, many of you know we're dealing with the whole subject of recordkeeping related to all pipelines separately through our

Gas Transmission Rule.

But, you know, maybe there's the opportunity down the road, as we go forward, learning from this as well, to apply to other materials.

MR. KIEBA: I'd also like to ask the committee too, this whole notion of permanence, permanency. Is it up to installation? Is that reasonable? Do we need some time past that?

Because I've seen some of these demos of these electronic systems. They don't even work in the hotel rooms, let alone, I imagine, they're not going to work in the field.

So, I've had some operators that say, honestly, I don't trust some of those demos out there. I want to rely what's on the pipe. So, some of them would say, I don't just trust right up to installation. I want a little bit longer past that.

So, again, I ask that question too. Unfortunately our NAPSA rep isn't on the committee right now. But from the whole, where

it started with the NAPSA resolution. But also, kind of again, what Committee members are really seeing now.

Is up to installation reasonable? Do we need some -- personally, I'm not a fan of putting an arbitrary, whether it's 20 years, 50 years. That's meaningless to me. Because we know anything could happen in the field when you install, operate, et cetera.

So, at the same time, I hear the comments that permanent is still very vague, even based on what it is in the standard. So I'd like some -- interested in some input on that.

CHAIR GANT: Sue, and then John.

MEMBER FLECK: That's exactly what I was going to address. So that was a perfect segue. Thank you, Max.

I think up until the time of installation is the right answer. And if it goes a little beyond that, and I expect it will, that's great.

Being held accountable, because you

got to remember, ultimately we end up being held accountable for the code, not the manufacturer. So if the word "permanent" is in there, and the manufacturers don't do a good job, I'm subject to penalty and fine and enforcement actions down the road. And that's not really fair.

So I think up to the time of installation, we can hold ourselves accountable. We will certainly get a little more than that. But permanent is a very scary word for us.

MR. GALE: John Gale, PHMSA. I'd just like to advise the Committee, or just give a recommendation. You know, it's been a difficult time getting some of these rules out over the last few years. Plastic pipe rule was under development for a long time.

So, regarding the issue of maybe pulling back and putting this into a separate rule, or trying to address both materials at the same time, we have also a very heavy rulemaking agenda over the next couple of years, finalizing gas transmission, moving forward on valve and

rupture detection, finalizing hazardous liquid and EFVs.

So it will be very difficult to get this onto the agenda with our resources that we have already dedicated to those rules. So, my recommendation to you would be to try to come to some kind of consensus on this proposal today, be it maybe a delayed time period, or what have you.

Regarding Richard's question earlier, regarding if we were to delay it, would it impact the use of that standard for the other proposals? If we delay the date, no. There should be no impact. But if we were to drop the proposal, as Max was saying, if we were actually looking at pulling back on that proposal and not adopting it at all, then it could have an impact. Thank you.

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. On the permanence of the marking, also, Sue and Cheryl are with large companies that can do the testing on the markings that they get from various manufacturers. They have the resources to do that. And they can see

if in fact they really are permanent.

For small operators, they don't have the resources to take a piece of pipe and test the markings to see whether they are in fact permanent. But we're the ones that the buck stops with us.

So, I like the suggestion of, once the pipe's in the ground, especially if we have the tracing and trackability, we'll know we bought a certain piece of pipe. We know where we put it. At that point we don't need to have that permanent marking on the pipe.

CHAIR GANT: So, I'm hearing a general support for the principal concept here of the importance of tracking and tracing. I'm also hearing what sounds like a consensus around the need that it will take more time than is proposed here to implement the record keeping requirement, that systems and new processes for some companies will need to be developed and put in place, that operator training will need to occur, that this will need to be implemented along with a number

of other requirements.

So, to do that effectively, we'll need a little bit more time. So it seems to me that the proposal on the table is to extend the recordkeeping requirement from two to five years. So that's one suggested change from the Committee.

The second one would be with regard to permanence. Making it at the time of installation. Removing the permanent requirement, and adapting it to show that it is available or visible at the time of installation.

Are there other discrete changes that Committee members would like to suggest based on the discussion that's been put forward already? Or other things that you'd like to raise? John.

MR. GALE: Thank you, Paula. If that is the scope of what the changes are -- and, Paula, thank you for bringing this all together in our conversation -- I think it would be now a good time to maybe open it up for any public comments that we have to see if there's anybody

from the audience that would like to make statements on the record.

CHAIR GANT: Before we do that, Rich?

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. Just one last comment. And I'd hate to see us lose sight of this. But, John, maybe put it in your to do list, that you do at some point -- I know it's real long. Add this to look at, to expand this. And I thought Andy's comments were excellent also. Consider expanding it to steel, but involve the steel pipe manufacturers and those that are large users and installers of steel pipe.

CHAIR GANT: Thanks, Rich.

I'll ask members of the public if you have comments or questions. I believe these mics are live here in the middle of the room. If you could announce yourself and your affiliation, please?

MR. MOIDEL: Yeah, Brian Moidel with Dominion East Ohio Gas. One consideration that you might want to think about is the outdoor

weatherability of plastic pipe. And that's in the ASTM D2513-09a. It's three years for medium density and ten years for high density. So that should be considered in the permanency.

I understand when you install it you have the ten years. So, it almost goes along with the installation date. But that's something that we need to keep in mind, that it's got to last, you know, at least for those timeframes. Because we can have it sitting outside and weathering for that period of time.

CHAIR GANT: Thank you. Any other comments?

MR. ERICKSON: John Erickson with American Public Gas Association. I guess we didn't talk about the first one up there. And one of our comments was that the PHMSA proposal deviated from what was barcoded in the ASTM standard. And I think we'd like to see the final rule limited to just those six fields that can be scanned in in the barcode.

MR. KIEBA: Yeah, I can tell you part

of that one. For instance, we have temperature, things like that. So, part of that was, you do have your CEE code on a print line. But I acknowledge, yes, it's not in the tracking and traceability standard itself. I think to get there you have to get to the lot code number. So our thought was, inherently it's in there somewhere.

But, again, we acknowledge that it's not specifically one of the component IDs. So, I think at some point we might have some language up here that tried to get them more consistent.

MR. MAYBERRY: Okay. I would just ask staff or Max, related to Brian's comment on the standard.

MR. KIEBA: Well, UV in general, I would say the desire of most inspectors is that you're not having it sit out in the sun. Hopefully you're covering it some kind, either inside or a tarp.

Now, granted, I know there's some painful inspectors out there that will ask you,

how can you guarantee, even if you tarp it? But I agree, either way, the UV aspect of it. And I think some manufacturers do look at that, even the ink itself, how long it's going to last for storage stability.

I would say another thing that ASTM is talking about is this whole three, ten years. You can technically go more. But there have been discussions amongst the committee, is there a way that you can put the actual UV exposure numbers somehow in that print line, or somewhere else in your certificate of conformance, of what it really is, even if it, can be technically more than three to ten years?

So, but no question. I think, either way, whatever the answer is, I think you would -- I think both inspectors would be asking, how can you prove it will at least last until the time of installation? Even your worst case scenario, if it's out there baking in the sun. And you've got to assume worst case scenarios in areas of Arizona versus other parts of the country.

Because the UV limits, I think most of us know, and there's even a note in the standard. It is based on artificial weathering, based on some lab testing. But I think it even has a caution in there to be aware of where you are in the country and different parts might have more UV exposure.

CHAIR GANT: So, on this question of weathering, and the fading of the label, I'll ask folks around the table if you have any observations or concerns on this.

It strikes me that if you're requirement is to have the label, the information visible at the time of installation, then it would be a contractual matter with you and your supplier to ensure that the labeling would survive whatever storage you were going to be putting it in. Is there a different wrinkle on that, Cheryl?

MEMBER CAMPBELL: Cheryl Campbell, Xcel Energy. Yes. The short answer is, yes. But, I mean, ultimately, it's my responsibility,

right, to install a pipe appropriately.

MEMBER FLECK: That's right.

MEMBER CAMPBELL: Sue said it earlier, right? It's not the manufacturer. I get it. So, I mean, if I send a crew out to install pipe, and they grab a coil of pipe and they can't read the markings, guess what, we shouldn't be installing it.

So, we get that. And, you know, that's between me and the manufacturer. Do I send it back for re-grind? You know, what do I do? But, yeah, that's between me and them.

CHAIR GANT: Last call for questions from the public.

MS. FARAG: Alicia Farag, LocusView Solutions. We're a technology provider. And we developed some technology specifically for capturing tracking and traceability information. And we've been working with operators for several years to do pilot projects and phased implementations of this technology.

And I would just like to re-emphasize

the point of the level of complexity involved in implementing this type of system, from the work practices in the field to the integration in the back office.

To do it right, it really is a multi-year process. And especially for some of the larger operators, there's a lot of implications on back end systems.

And just capturing it on paper, I mean, yeah, sure you could do that. But if you really want to do it right, and put it in a system of record that allows it to be easily accessible when you do need to retrieve it, there is a lot of moving parts involved in that. And again, it is really a multi-year process to get that type of thing done.

CHAIR GANT: Okay. I think we're ready to move to a roll call and vote.

MR. GALE: Yeah, just real quick, Paula, what we're going to do is put a slide on the screen that can help the members get to a motion, and possibly a vote, if they so please.

MR. KIEBA: And I think what I heard is, even if -- so, extend it to five years. But I think that second bullet is still take out that "permanent." But I think what I heard was readable, is readable. At installation, or until installation. Is that what I heard? You got that, Cam? Okay. Yeah, legible.

I did hear a comment asking at some point -- well, I don't know if we need to see it now, but in the final rule, the whole lining up the definition of tracking and traceability in the rule versus the standard. But I think we have that somewhere else.

CHAIR GANT: So, these are the two changes that we've discussed. And the other recommendation to look at extending this to steel pipe will be captured on the record separately.

MR. KIEBA: I would ask, this compliance, is that still just the recordkeeping compliance?

CHAIR GANT: Yes.

MR. KIEBA: Okay. So everyone's still

okay with the marking for one year -- Okay. So this is recordkeeping compliance is extended. Okay. Just to make sure we're clear on what we're --

CHAIR GANT: Okay. So, I'd ask if there are committee members who would like to put forth -- Rich.

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. I would also add that we limit the items to the six that are listed in the ASTM: the manufacturer production date, lot information, size, material, and type.

MR. KIEBA: Can you get to that one, Cam? One second. We're just trying to find out if somewhere in these slides we might have that wording. I would say the definition in 192.3 is limited to the categories in 2897. Yes.

CHAIR GANT: So, the categories on Slide 7. Does that capture it, Rich?

MEMBER WORSINGER: I think it does.

MR. KIEBA: I think we need the traceability definition. Because there's two

different definitions. One is the tracking definition, one is the traceability. But I think we're talking the traceability, yes.

Because I hope everyone's clear, for the tracking definition we did add the person that made the joint, which isn't anywhere. But I got the sense everyone kind of agreed with that one anyway. But we didn't get many comments on that part. But the traceability definition is the one that talks about 2897.

CHAIR GANT: On Slide 7, it doesn't make that distinction. But you're saying it does make it in the rule?

MR. KIEBA: Yes, yes.

CHAIR GANT: I just want to make sure this addresses Rich's concern.

MR. KIEBA: Cam, can we go back two slides? One of our slides had a hyperlink at the top there. I think that would help. The second bullet. Can we click on that? There you go.

So, on the left is I think what was proposed. Yeah, so that one on the left is what

was proposed in the NPRM. You'll see it has pressure rating, temperature rating. On the right is a little more aligned to I believe what's in the standard, particularly in the red area.

And if anyone needs it, I actually have the standard itself. So if anyone, you know, wants to look at it.

MEMBER WORSINGER: I think that looks correct.

CHAIR GANT: Okay. So can we go back to the potential motion, the language for the motion?

MEMBER HILL: Madam Chair, I'm ready to make the motion.

CHAIR GANT: Okay. Excellent. Can we go back to the slide with the language for the motion, please?

Mr. Hill, would you like to make this motion?

MEMBER HILL: Yes. Madam Chair, the Technical Pipeline Safety Standards Committee

finds that, related to tracking and traceability, the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost-effective, and practicable if the following changes are made.

Number 1, record keeping compliance is extended from two to five years.

Number 2, the marking is legible until installed.

Number 3, the traceability definitions in 192.3 is limited to the categories in the standard (F-2897), and a list of amendments agreed upon by the committee.

CHAIR GANT: Thank you.

MEMBER HILL: You're welcome.

CHAIR GANT: Cameron, ready for the vote?

MR. SATTERTHWAITE: We need a second.

CHAIR GANT: And I would ask, is there a second for this motion?

MEMBER FLECK: I'll second.

MR. SATTERTHWAITE: All right. We're going to do a roll call. And we'll start right off. Paula Gant.

CHAIR GANT: In favor.

MR. SATTERTHWAITE: Cheryl Campbell.

MEMBER CAMPBELL: Agree.

MR. SATTERTHWAITE: Andy Drake.

MEMBER DRAKE: In favor.

MR. SATTERTHWAITE: Sue Fleck.

MEMBER FLECK: I agree.

MR. SATTERTHWAITE: Rich Worsinger.

MEMBER WORSINGER: In favor.

MR. SATTERTHWAITE: Bob Hill.

MEMBER HILL: In favor.

MR. SATTERTHWAITE: Bob Kipp.

MEMBER KIPP: Agreed.

MR. SATTERTHWAITE: Rich Pevarski.

MEMBER PEVARSKI: Agreed.

CHAIR GANT: Well, it looks like we have a tie between the in favors and the agrees. I think that means the motion passes. Okay.

So, in other good news, as Chair I'm

going to exercise the prerogative to call for a break. So we're going to take a ten-minute break.

MR. MAYBERRY: Sounds good.

CHAIR GANT: Excellent. Thank you. We'll reconvene in ten minutes, at 2:30. Thank you all.

(Whereupon, the above-entitled matter went off the record at 2:18 p.m. and resumed at 2:31 p.m.)

CHAIR GANT: We have the second act of plastic pipe up on our agenda for the afternoon. So I'll turn it back over to Max to keep walking us through the details.

MR. KIEBA: Yeah, and our current pace, we're only here for another six hours. But no, I think the next few will be, I hope, a little easier. So the next is this is where we kind of lumped in the different categories on design factor, bringing in PE to the .4 design factor extending PA-11 and then bringing in PA-12.

And again, I just put on the equation here, because a lot of people kind of forget how plastic pipe is designed, or maybe have steelheads out there that are used to steel. But here's what you do for plastic. Still Barlow's formula.

I would say the big thing is that S value where steel is certainly used to an X52 or something. For plastic, it goes to an HDB, hydrostatic design basis reading based on PPI listing.

Where this is important is we have one comment you'll see later. But, so, you can interpolate it based on 73, 100, or 120, or 140, sorry. We did a couple comments on bumping that up to 180, because there are some plastics, some people traditionally are used to plastic can only go to 140, but there are some newer materials today that can go up to 180.

And then at the bottom you have the design factor there. Traditionally it's been 0.31. PA-11 in a code now can go to 0.4 on 200.

But as part of these proposals -- yeah, so I'll start with PE here. The design factor for PE, that's the AGA petition based on some technical work by GTI to raise the maximum design factor for new and replaced PE from .32 to .40.

The pressure limitation would still remain at 125 in their section E. So it would still have an ultimate cap at 125. In a proposal, the diameter limitation remains at 12-inch if you want to go to 125, but you'll see later we did get some comments to raise it to at least 24-inch.

And we do still retain the .32 if for whatever reason, you know, some operators just don't want to go to .40 or they want to still stick with the .32, there is still a section in the proposal which you still do for the .32. Essentially, just retaining that for the pipe up to the effective date of the rule.

For PA-11, so, we proposed to raise the pressure from 200 to 250, and raise the

diameter limitation, what's currently four-inch, up to six inches.

For PA-12, essentially bringing into the code hasn't been up to now, but it will follow essentially the same limits as PA-11: .4, maximum pressure of 250 psi, and maximum diameter of six-inch.

So comments we got in, overall there was broad support for all material revisions. We did get a number of comments, and honestly this was just an oversight. But we need to add sizes for one-inch CTS.

For those that aren't familiar with plastic, IPS is iron pipe size. CTS is copper tubing size. Right around one-inch is where they kind of crossover. So there were a number of comments to add that. And also IPS smaller than one inch, particularly for PA-11, PA-12. So that's one we agreed to, certainly.

For PE, we got comments to raise the maximum diameter. This is kind of a nuance of the standards themselves. So there's a table in

the standard, particularly in the '12 version, that still says what's commercially available.

Up to now, it's only been 12-inch. But in the '14 version, which is a later version than what's proposed, it does go up to 24-inch. And I acknowledge out there, there's a number of folks particularly trying to rehab a lot of your larger diameter cast iron and others, they are trying to install some larger diameters above 12 inch.

There was a request that the new design factor apply retroactively. There was one entity, it was a non-PE entity, that opposed what they called a less conservative design factor in 2513. We did get some comments to relax the 125 psi limitation.

So, from a design standpoint, it is based on essentially your standard dimension ratio. It is a pretty conservative value still if you consider, for instance, most common pipes are 11 standard dimension ratio.

If you go down to a lower value, which

is thicker wall pipe, you can design it up to 150, possibly close to 200 even for PE. But having said that, the reason that was put in place in the code was to provide a more conservative value.

I think we're losing mic again. How are we doing? Okay? I guess I would ask can the court reporter hear me okay or do we need the mic to be working? Okay. So I'll just talk louder.

So, for PA-11, allow the design based on an HDB at 180F instead of up to 140, and then also permit the use of this particular designation code. So, for those that are used to PE, you might get a PE2406, et cetera. They're based on resin.

On the polyamide side, you'll see a designation code that looks like this. So there was a request, comment, to allow that for 250 psi. I would say for that one there's an issue there because that 32312, once you correlate it down, that correlates 2 at 200. You can only go to the 316 for the 250.

So we're still allowing both versions for 200, but 250, from a design standpoint, you can only go to the 316. And I think most of the PA-11 manufacturers would probably say they're not even manufacturing that 312 anymore. They're going with the newer version.

For PA-12, we got comments, some editorial revisions, particularly around that table. And then yes, they gave us a comment just to specify the material designation code there.

So just some possible recommendation and changes is revise the tables for clarity and to add one-inch CTS and IPS below one-inch. And also include the material designation codes.

So I think the big one here, to me, and I'd like some input from the Committee, is particularly that first one, I guess, is around the 24-inch. I acknowledge it's commercially available in the code. It's just kind of a nuance that the standard, at least currently, doesn't cover it.

There is kind of an annex that talks

about larger. So if we go to the '12 version, we are pretty close to the '14. So you know, there's a possibility having said that, the way the rule went out it did not promote or it did not propose the 24-inch limitation.

So I guess it's a question from a process standpoint if we can just randomly go up to 24-inch if that wasn't what was proposed.

I think at some point we are going to have to talk about that 125 that's kind of coming up with some gathering operations that right now are operating above 125 and still PE. They are limited to that.

PE-11 you could still go up to 200, right now, 250. So I think at some point we have to look at that 125. But, again, since it's what's proposed in the rule itself, in the NPRM, I don't think we can go there for at least the final rule, other than maybe an acknowledgment that we'll look at it in the future.

CHAIR GANT: Comments or questions from Committee members? Cheryl and then Andy.

MEMBER CAMPBELL: Cheryl Campbell, Xcel Energy. Question. I understand what you're saying about process, I think, Max. I'll just characterize it with that. But I mean, I'm presuming that the pipe meets all the other criteria. So I'm having a hard time thinking why would we exclude it.

Is there a way to -- and we're back to the comment you made earlier about how do you incorporate sort of routine standard updates, right, without having to go through a rulemaking process when these things come out? Because, you know, it seems like if it's there and it meets the criteria and it's safe, how do we get that kind of stuff incorporated easily?

MR. KIEBA: Yeah, this is where I would ask John and his group, because what was proposed, as part of this we did merge the 121 and 123 together. So, design and limitation is there.

But for PE, we have for PE produced after the effective date of .40 may be used. If

the design pressure's limited to 125, the material designation code is a 2708 or 4710. And yes, we still have a three that the pipe has a nominal size of 12 inches or less.

So I guess I'd ask John that question of, if we really want to go to 24-inch, how do we get that resolved?

MR. MAYBERRY: John, also want to clarify that it wasn't in the proposed rule. So, you know, a lot of times when we change something to that extent, it may require another notice and comment before that.

MR. GALE: We haven't proposed that. We would have to definitely look at the possibility that it would have to go through notice and comment again. But I mean, we should try to write the regulations, if there are ways -- we're always looking at ways to not always require regulatory changes, to be as flexible as possible when it's appropriate. But if it's something we haven't addressed, we probably have to go through a reg change.

CHAIR GANT: Andy?

MEMBER DRAKE: Andy Drake with Spectra Energy. Max, I have a question. It's in regards to the same question that Cheryl had, and that is, when you look at 2513-14, does it specifically support pipe beyond 14 inches?

MR. KIEBA: Yes.

MEMBER DRAKE: So inside the scope of that standard goes beyond?

MR. KIEBA: Yes. Yeah, what 2513 has is a number of tables that say here's what's commercially available, here's the different minimum wall thickness you have, et cetera. Even at the 12 version, they did not have a full on minimum wall thickness table for 12-inch, or sorry, above 12-inch. In the 14 version, they have incorporated that.

MEMBER DRAKE: Okay. So I just guess I got confused for a second. It sounded like you felt this -- you were differentiating above 14-inch was not well covered in the standard. Is that --

MR. KIEBA: It's covered in the standard. Here's a nuance where this is one of our parts of our code where we, for some reason, for plastic, we do have clear limits on the table of 12-inch and here's your minimum wall thickness, particularly if you want to go to the .40 versus saying, you know, just go to the standard for your minimum wall thickness for larger sizes.

It's just kind of the way the code has been written. But, again, from a technical standpoint, I acknowledge the current standards have a higher version -- or sorry, a larger limit.

The problem is what we proposed was the 12 version that doesn't have that. So now there's a suggestion to go to a newer version. And I think that's more of a nuance across the board.

I would say we got a number of comments that say, hey, you should go to the 14 version of this and other later versions of this,

and I think that's a nuance that we would just, we would have to do that in a standard update rule later. We just can't do it in the context of this rule.

MEMBER DRAKE: Okay, so some sort of Robert's Rules of Order. What your proposal was based on was 12?

MR. KIEBA: Right.

MEMBER DRAKE: And now a new standard has come out that recognizes beyond 14 and up to 24-inch. But the original proposal did not use that version.

MR. KIEBA: Right.

MEMBER DRAKE: Okay. Well, incorporating later versions is really not about a significant event. I mean, that doesn't even require rulemaking actually. That's an incorporation of a new standard.

MR. KIEBA: And it could be possible. I don't know, I'd have to talk to leadership. But, you know, is this a case where we can do a save enforcement or something for the time being.

I don't know.

You know, I know we've done that with, like, the 5L when it went to different versions and some manufacturers were manufacturing to the new version that wasn't in the code. But again, I would defer to our leadership in rulemaking on those process aspects.

Officially, now what you would have to do, you'd have to apply for a state waiver or a special permit, which is always painful for anyone. I would hope not to have to go that route, but I don't know.

I would say, again, from just the technical perspective, again, yes, there's commercially available, much larger, heck ,there's people manufacturing pipe that's, you know, five foot in diameter, five foot wall thickness. So much larger even than we're used to.

MR. MAYBERRY: Yeah, also just a comment. In conversing with John, we would have to go through another standards update

rulemaking, it looks like. Even though it's an updated version, we're dealing with a -- you know, the version we have is what we noticed. But it would be a standards update rule, which would be, they do go quicker.

This is what we have today, but, you know, perhaps the Committee could potentially recommend that we move forward to consider an update to the standard.

MEMBER WORSINGER: That adds something else to John's to-do list.

CHAIR GANT: Apparently that's our task here today. So the concept is that in considering this aspect of the rule, the Committee would request that a standards update rulemaking occur referencing 2513-14, correct?

MEMBER DRAKE: I think what the proposal is that we are voting on the proposal that you put before us, which is 14. Which is really 12, right? And then we would have to approve that and then make a recommendation that you consider 14 as a separate action. Is that

right?

MR. MAYBERRY: It would be a separate comment, a request, a homework assignment by Rich to John to follow up from that. But yes, we need to vote with what we have here today. It's the earlier version.

MEMBER CAMPBELL: Then I make a motion to vote.

CHAIR GANT: Hold on just a second. Just want to make sure there aren't any other issues that the Committee wants to raise. And I want to open it quickly for public comment. Okay. Comment, Sue?

MEMBER FLECK: Quick clarification. On the first point, we did fix that, the smaller diameter?

MR. KIEBA: Yes, yes. We are fixing that.

MEMBER FLECK: Great, thank you. That was Sue Fleck, National Grid.

MR. KIEBA: And the one-inch CTS, we're putting that in the table, as well. Yes.

CHAIR GANT: Comments from members of the public? Please announce yourself.

MS. KURILLA: Sure. Hi, Erin Kurilla, AGA. Just looking at the proposed rule, it seems like you did not specifically incorporate the standard by reference, but instead pulled the table out of the 12 standard and copy and pasted it in.

So I don't think it's just as simple as updating the incorporation by reference. So that's a nuance that I don't think would just get addressed by a standards update rulemaking.

And then the other issue that wasn't addressed is your -- it's the bullet on retroactivity. So, as written in the proposed rule, only PE pipe manufactured after the effective date of the rule would be allowed for the new design standard.

But AGA's comments suggested that really any pipe that meets that standard, regardless of the date of manufacture, should be allowed.

MR. KNAPP: Yes, hi. Randy Knapp with the Plastics Pipe Institute. And I just wanted to make a comment on the D2513-12 version. Max is correct, it does not include minimum wall thickness in the tables. But it is intended to apply through all sizes of that standard, which is up through 24-inch. So all the requirements, including the marking requirements, do apply up through 24-inch.

That table was, I guess, inadvertently left out in that version where the minimum wall thickness. But everything else in there is exactly the same. So even adopting it, and if going up to 24-inch, those requirements would still be in place.

But again, that minimum wall thickness. So I think it can cover it. Of course, the preference would be to have a later version, but I think that could work too.

MR. KIEBA: Yeah, just a couple of points. Erin is correct. Instead of just IBRing, what you would have to do is also look at

the updates to this portion. But I think that can be done, yeah.

The retroactivity part, that's a little tough because this is officially in a non-retroactive sub-part design. So just written in this part of the code, it wouldn't apply retroactively. I guess we'd have to look at how we would apply that if all other things considered.

Really, the pipe doesn't care, right, from a design standpoint, when our rules become effective. But we do from politics' side. So, look at that for another example of a potential permit site waiver, but I don't know.

CHAIR GANT: Okay, Cheryl?

MEMBER CAMPBELL: That's exactly what I was going to say, Max, is the pipe doesn't care, right? I mean, as long as the pipe meets those standards, if there's a way to do that to allow it to be -- but I hear you, you don't necessarily want to put something retroactive in the design section of the code.

So if there's a way to do that, then that makes perfectly logical sense to me.

MR. KIEBA: We kind of did this with rework when rework came out. And we had an FAQ out there that said if you can justify, demonstrate you're still meeting the 09a, even if it was used before the effective date. So we've looked at that in other areas. I think this is where we would have to go back certainly to the agency and certainly legal and others to see what we can and can't do, given it's in a non-retroactive sub-part.

MR. GALE: John Gale from PHMSA again. And also we'd have to look at the fact that we didn't propose it. I mean, we're not saying we can't do it, but it would be a difficult thing to actually adopt the final rule stage without providing public full opportunity to comment.

CHAIR GANT: So maybe it could be recorded as a request from the Committee that staff explore as options?

MR. GALE: That we explore, yes.

CHAIR GANT: Okay. Cameron, can you put the text up on the -- the vote text up on the screen, please? And once we have a chance to look at it, I would ask for a motion from the floor.

MR. SATTERTHWAITE: Am I missing anything? Or just add in the --

MR. KIEBA: It's the slide before that talks --

CHAIR GANT: The PHMSA recommendations you're referring to regard the one-inch CTS.

MR. SATTERTHWAITE: Got that.

MR. KIEBA: The one-inch CTS, being clear on the materials designation, particularly for PA-12.

MR. SATTERTHWAITE: Anything else?

CHAIR GANT: Does the Committee want to reflect the request that the staff look at the updated standard and explore options there? I think it's important that that's recorded in the vote.

MR. MAYBERRY: And the retroactivity

issue.

MR. SATTERTHWAITE: What was that, 14?

CHAIR GANT: Yes. It's harder to type when everyone's watching.

(Laughter.)

MR. KIEBA: Research the retroactivity of .40 design factor for PE. You just might want to add .40 design factor.

CHAIR GANT: Thanks, Cameron. I would note that the text on the slide is an abbreviated version of a more complete text that will be reflected in the record as provided by the court reporter reflecting the conversation here and recommendations of the Committee and comments raised by the public.

Given that, I'd ask for a motion, for someone to offer a motion.

MEMBER FLECK: Sue Fleck with National Grid.

The Technical Pipeline Safety Standards Committee finds that PE-/PA-11 and PA-12, the proposed rule as published in the Federal

Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost-effective, and practicable if the following changes are made.

PHMSA recommendations are incorporated.

PHMSA consider the later standard ASTM-D2513-14, and PHMSA research the retroactivity of the design factor for PE with a .40 design factor.

MR. SATTERTHWAITE: Okay. I'm just going to run through the names. If you agree, you can say aye. If you don't, you can say nay. And if you want to abstain, you can say abstain.

All right, Paula Gant?

CHAIR GANT: Aye.

MR. SATTERTHWAITE: Cheryl Campbell?

MEMBER CAMPBELL: Aye.

MR. SATTERTHWAITE: Andy Drake?

MEMBER DRAKE: Aye.

MR. SATTERTHWAITE: Sue Fleck?

MEMBER FLECK: Aye.

MR. SATTERTHWAITE: Rich Worsinger?

MEMBER WORSINGER: Aye.

MR. SATTERTHWAITE: Chad Zamarin? Oh, he's not here. Bob Hill?

MEMBER HILL: Aye.

MR. SATTERTHWAITE: Bob Kipp?

MEMBER KIPP: Aye.

MR. SATTERTHWAITE: Richard Pevarski?

MEMBER PEVARSKI: Aye.

MR. SATTERTHWAITE: All right, then it's unanimous. Okay.

MR. KIEBA: Moving on. We're doing better on time. I've got to say, though, this is great for me because, heck, rework was fun, talking that for a long time. But this is the longest we've ever talked about plastic, so this is great.

All right. Okay, risers. So, up until now, we do not have a section on risers. GPTC did petition us to permit, and there's another nuance of the code where we don't allow for plastic pipe to be installed above ground.

So GPTC did petition us to permit aboveground, encased plastic pipe for particularly metering and regulator stations.

So in the proposal, we propose to require, we added a section 204 for requirements for design and construction of plastic risers. We're proposing to incorporate this ASTM F1973 for factory assembled anode-less risers. And this applies to all material types.

Overall comments we got were broad support of at least having a section on risers. We did have specific issues and concerns, particularly we had this prescriptive three-inch base leg language. There was a request to define what we meant by rigid and permit flex risers in certain applications.

There was a number of commenters that pointed out we did not incorporate a standard for field-assembled risers. So the whole nuance of would they be allowed or not, or do they have to meet an elicit specification where every other parts that say it has to meet it?

There was also request to clarify that risers besides anode-less are allowed.

So the possible changes, from the staff's perspective, certainly eliminate that three-inch base leg requirement.

We would still have the rigid in there. Generally speaking, from the technical staff's opinion, it is important to have something rigid, particularly at these metering and regulator settings, particularly when you're out in the field where, for those that know, when you're near a house, typically you'll have a bracket or something that supports it.

When you're out in the field, there's not a whole lot you can do. Some people you ask to put a stake in the ground and support it that way. I guess it's a big question if that's acceptable enough with all the soil subsidence you might have and other changes.

So the general feeling of the staff was to keep the rigid part of it but still have some performance language that it should be

adequate to provide support. I guess it's possible you could have a flex riser if it's properly supported. But based on how the language is written, you would have to still justify how it's rigid supported.

We also suggested to, yes, specify that only factory-assembled risers meet that specification. So, field-assembled, basically they have to meet the more general requirements of the language.

And, Cam, if you can go to that link, I think we have some alternative language. So how it would apply, (a) applies to all, shall be tested to ensure safe performance, other anticipated external/internal loads.

(B), we are adding in clarification that factory assembled anode-less risers shall be designed and tested in accordance with F1973.

And we are modifying or proposing to modify (c) to say all risers used to connect regulator stations to plastic mains must be rigid and designed to provide adequate support and

resist lateral movement.

And we still have that sentence, "anode-less risers used in accordance with this paragraph must have a rigid riser casing." So the way that's written, again, at least (b), says yes, if you have a factory assembled riser, you have to meet 1973.

It's kind of silent on what you do with field assembled, but the intent is, hey, if you can justify it as safe, can handle those anticipated external loads, it may be acceptable. So that was the intent of how these changes were, but certainly open it to thoughts from others.

CHAIR GANT: Comments from Committee members? Sue?

MEMBER FLECK: Sue Fleck, National Grid. I think I only had one question other than the ones that you covered, and thank you for covering the issues that we had some concerns about.

There's a concern that this might be considered retroactive. Is it intended to be

retroactive or is it intended for risers installed after the date that the code goes in effect?

MR. KIEBA: Yes, it is intended. Everything in this rule is intended to apply for new and replace going forward. So there might be some other parts that might be in a retroactive subpart, but we'll make sure we try to clarify the language to say "for anything installed after X" would meet this. So, yeah.

CHAIR GANT: Any other comments by Committee members? Okay. I would ask to turn to the public, ask for any questions from the public, or comments? Okay.

Could we move to the text for a motion please, Cameron?

I've heard from Committee members that you would like to have clarification that this is intended to apply on X date forward, that it's not retroactive.

Also, do you want to reflect the issues that PHMSA staff have acknowledged have

been raised in comments and they seek to address, or they intend to address? Anything else that should be added?

Okay, then, considering that the motion will reflect the language, the recommendations discussed here by PHMSA staff on the intended changes, and noted here on the slide, could I ask for a motion from a Committee member? Cheryl?

MEMBER CAMPBELL: Cheryl Campbell, Xcel Energy.

The Technical Pipeline Safety Standards Committee finds that related to risers the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost-effective, and practicable if the following changes are made.

PHMSA clarifies that these provisions are not retroactive, and incorporate PHMSA recommendations.

CHAIR GANT: Thank you, Cheryl. Is

there a second?

MEMBER PEVARSKI: Second.

CHAIR GANT: Thank you, Rich. Cameron, over to you for the vote.

MR. SATTERTHWAITE: All right. I'm going to do the roll call. Remember, aye, nay, abstain. Paula Gant?

CHAIR GANT: Aye.

MR. SATTERTHWAITE: Cheryl Campbell?

MEMBER CAMPBELL: Aye.

MR. SATTERTHWAITE: Andy Drake?

MEMBER DRAKE: Aye.

MR. SATTERTHWAITE: Sue Fleck?

MEMBER FLECK: Aye.

MR. SATTERTHWAITE: Rich Worsinger?

MEMBER WORSINGER: Aye.

MR. SATTERTHWAITE: Bob Hill?

MEMBER HILL: Aye.

MR. SATTERTHWAITE: Bob Kipp?

MEMBER KIPP: Aye.

MR. SATTERTHWAITE: Richard Pevarski?

MEMBER PEVARSKI: Aye.

MR. SATTERTHWAITE: It is unanimous.

CHAIR GANT: Okay, great. Moving right along to fittings, back to Max.

MR. KIEBA: Okay, fittings. So the primary part of issues we've seen through advisory bulletins, a number of other issues where the fittings or joints have pulled out, particularly soil subsidence or other issues.

So the proposal was all mechanical fittings must be Category 1. So for those that aren't familiar with the standard, that's the most stringent category that provides seal plus resistance. There is another category that provides seal only. And there's a third category that also provides seal and resistance, but based on thermal changes of essentially the soil. So this Category 1 would be the most stringent category.

Overall for comments, we did get broad support. There were also some concerns with retroactivity. And on the fittings part in here was we talked about if there's a metallic

fitting, it has to be cathodically protected and monitored.

So I think we already talked about the retroactivity part. There's no part of this rule that's intended to be retroactive. So we will clarify that.

For cathodic protection, we got a number of comments here of either they felt monitoring was too intensive based on what 455 requires. So there were comments to require monitoring every ten years rather than ten percent of the system each year. Do not require it for monitoring of isolated metal fittings.

And there were cost concerns if you applied it to every -- and you can just imagine how many of these metallic fittings might be out there. Do you really have to cathodically protect and monitor every single one like you do, you know, a full-on steel system?

We did get some opposition on -- some suggested that we requested that these requirements only apply to distribution systems.

We did get some requests to -- some comments that requested revising to allow Category 2 or 3 on larger diameter lines, particularly in cases where there might not be a Category 1 joint available.

Possible changes, from the staff's perspective, there's a couple avenues we can go, or based on comments received. Some removed the proposed 192.455(g) completely, or at least from the aspect of what's required for plastic.

There is a note here that current regulations do require cathodic protection and monitoring for isolated fittings that don't meet the conditions in 455(f).

Cameron, is this a link to some alternate language? Okay. Can you go there?

So a couple comments we got in, if you look at (g), it's either remove that completely. A couple other comments we got just say "must be cathodically protected" and remove the monitoring piece.

So what you typically do on a fitting

aspect, you probably put an anode in there based on however long that anode would last. So you know, typically they might be 20, 30 years. So you know at some point you have to change the anode, but you don't have to do the full on monitoring aspect.

I don't know if we open that for Committee comments at this point for corrosion. I would say on the whole comment on Category 1, if it's not commercially available, from a technical staff standpoint, there are other methods out there that you can form a joint.

So I don't think just because something's not commercially available that means you have a less safe category, in our opinion. You should be able to go with some other avenue, whether it's fusing or something else.

There's multiple options out there that you could still have a strong joint even if it's not a Category 1. So I think there are strong feelings on the staff standpoint that it should be Category 1 still across the board.

And if there's not something commercially available, maybe the vendors need to come up with something that is, but we still feel strongly, there's been too many issues with fittings pulling out for whatever reason that we, don't feel that should happen anymore.

CHAIR GANT: Comments from Committee members? Rich?

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. We support the proposed changes, with the exception for the monitoring of cathodic protection. We suggest that just be dropped. We just think this would be very costly with minimal benefit. We're not aware that there's been ever any failures of these due to corrosion.

MR. KIEBA: So would you -- sorry. Cameron, can you pull up the (g) again? So is your comment to leave (g) in but delete monitored in accordance with this section in 465?

MEMBER WORSINGER: I would say leave (g) in, say that they're cathodically protected

but not monitored. You know, typical practice is you put an anode on it and anodes last decades, especially when you've got such a small piece of steel in the ground.

MR. KIEBA: So that's one avenue. And I think we also got just remove this (g) completely, I think, other comments.

CHAIR GANT: Other comments from Committee members on leaving (g) in and altering it to remove "monitored"? Or removing (g) altogether. Cheryl?

MEMBER CAMPBELL: Cheryl Campbell, Xcel Energy. So I'm just going to kind of throw this out there. Right, it's never good when you just start talking, but I'm going to do it, because Andy, Rich, I mean, some of the other folks in the room, Sue and Max, your team, you guys can throw rocks.

So when I think about integrity management, right, and I think about knowing my system and dealing with the risks appropriately, I mean, it feels like if I have an area where the

soil is such that I have some corrosion issues, then maybe I should be putting an anode in there and potentially checking on it every once in a while to make sure that I'm protected.

Otherwise, if I don't have a soil type that's going to create an issue for me when you've got an isolated metal fitting like this, it feels like the requirement shouldn't be there.

So is there something that we could do using the principals of integrity management to say, hey, you should know your system and you should understand what you're dealing with and install and monitor as appropriate?

Again, I'm just kind of throwing that out there.

MR. MAYBERRY: From my perspective, it's kind of hard to imagine to allow, you know, a fitting to be installed that's protected, but that you're basically allowing it to go to failure without understanding at what point would that happen. You don't know unless you have an idea of the soil resistivity and the tendency to

cause corrosion or induce corrosion. So I don't know, just something to think about.

At what point would it, you know, could it potentially down the road become an issue? And how do you get comfort that it's been installed and it will remain protected for the life of it, the usable life? You know, just how do you control that? Just a thought.

CHAIR GANT: Andy?

MEMBER DRAKE: Andy Drake with Spectra Energy. I would have to agree with that. I think it seems a little bit incredulous that we would drop (g) completely and we would bury a metal object in the dirt and not protect it.

And I don't hear anybody espousing that. At least not at this table anyway. But I agree that if we could define some criteria, that would help us understand appropriate places where we didn't have to put it in there.

I think at some point, if we err, err on the side of inclusion. And I think at some place we have to just decide, is the juice worth

the squeeze? You know, are we going to come up with something that's a very onerous requirement, that takes a lot of energy, to save putting in anodes that are not significantly expensive.

But that's not really my call. I think it's just a question as to -- it's just really a question that we need to answer as we go through this process, is it worthwhile to try to do that and can we do it?

But I think that just saying "as appropriate" will not be clear enough to be practiced consistently. And we've seen that historically. And I think, just as kind of a caution, if we get into that place, we're probably better to err back on over-installing just for the point of consistency.

MR. KIEBA: I think it's fair to say, I mean, again, this particular (g) applies to electrodes are by design supposed to be isolated from others. But I agree. Put any metal in the ground, it's going to find a way to corrode. So without having something, I agree we need

something. I just don't know if it's this something.

MEMBER FLECK: Sue Fleck, National Grid. I agree with that.

Is it not working? It's on. Nobody's on.

(Technical difficulties.)

MEMBER FLECK: It's been a long day already. I think we should say it must be cathodically protected. I'm just not comfortable with the monitoring part, because that's additional record keeping and all that.

So I figured we would strike -- and I think that's what Rich said -- we strike "and monitor," then I'm more comfortable, because I believe, most cases, 99.9 percent of the time, we're cathodically protecting every piece of metal that goes in the ground.

CHAIR GANT: Any other comments from Committee members? I'll turn to the public and ask for comments.

MS. SAMES: Christina Sames, AGA. To

get to Cheryl's point, maybe a suggestion to stop after "cathodically protected." So remove the monitoring, and possibly put something "as appropriate" according to integrity management, distribution integrity management principles. Something along those lines I think would be a way to get there. Or as appropriate.

CHAIR GANT: I'll ask Cameron to put the draft recommendation up on the screen and ask Committee members if they have any final thoughts as we do that.

(Pause.)

MR. KIEBA: I think specifically the recommendations still have that monitored. So what I heard was stop it at "cathodically protected" as the proposed language.

So it would essentially be what's proposed for G, but stops, period. That's one version, after cathodically protected. Then I heard, from the public, do we need "as appropriate" or not?

CHAIR GANT: Can you write it up there

Cameron? And then we'll ask the Committee to take a look at it.

(Pause.)

CHAIR GANT: So delete the comma after "protected" and delete the rest of the sentence?

MR. KIEBA: I heard a period or "as appropriate." So let's start deleting everything after the "and monitor." So the question is, do you just have a period or "protected as appropriate"?

MEMBER CAMPBELL: I think, I mean, I agree with what you're saying. If you're going to put the metal in the ground, it needs to be protected, right. I guess the issue is, now we're trying to push the whole industry --

CHAIR GANT: Can you speak up since the mic's not working?

MEMBER CAMBPELL: Normally I don't get asked to speak up, Paula, but absolutely I can speak up. If you've got an active soil, right, if it's soil where you can have active corrosion, then, yeah, I mean, you should be checking it and

monitoring it more frequently.

If you have an area that doesn't, that's not active, then there's nothing wrong with betting an anode in because it's probably going to outlast the line that it's installed on.

So I mean, I think that's the idea that Christina and others are trying to get at, is you don't want to just say don't do anything. You want to encourage -- I would think you would want to encourage operators to set up the right program.

MR. MAYBERRY: I would agree, it's hard to say put it in and don't worry about it. I mean, the words coming to my mind, address cathodic protection as deemed necessary by the operator's integrity management plan, something along those lines.

MEMBER CAMPBELL: I like that, the operator's integrity management plan.

CHAIR GANT: That would apply to the monitoring piece, not the protection. So it would be comma after protected, and monitored as

appropriate in accordance with the operator's integrity management plan.

MEMBER CAMPBELL: That makes sense. Andy, I'm looking at you.

CHAIR GANT: Or maintained?

MEMBER CAMPBELL: Maintained? I like that better.

MEMBER DRAKE: I think that makes more sense.

CHAIR GANT: So we're saying in accordance with the operator's integrity management plan, we don't need "as appropriate."

MEMBER CAMPBELL: Correct.

CHAIR GANT: Must be cathodically protected and maintained in accordance with the operator's integrity management plan.

MEMBER CAMPBELL: I like that.

MR. MAYBERRY: You know, just thinking outloud, maintain brings up operation and maintenance.

CHAIR GANT: Well, but the idea is that the responsibility is to maintain it. How

do you ensure that it's maintained, whatever, monitoring or other activity you might engage in to maintain the integrity.

MEMBER FLECK: Sue, National Grid. So that gets to whether you bury it and you know it lasts 30 years and you replace it in 30 years, or you bury it, to Cheryl's point, and you know it's in wet, corrosive soil, so you actually put in a test station and monitor it every year to keep an eye on it. But that's been the point and that would be an operator's choice and an operator's responsibility.

CHAIR GANT: Okay, thank you. Any further comments from the Committee before we get to a motion?

Cameron, could you paste that text into the motion, please?

Do we need a comma after protected?

MEMBER FLECK: Protection choice is also part of your integrity.

CHAIR GANT: Can I have a motion? Would you like to make the motion? I've got to

get you out of here at 4:30.

MEMBER FLECK: Oh, this doesn't work.

The Technical Pipeline Safety Standards Committee finds that, related to fittings, the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost-effective, and practicable if the following changes are made.

PHMSA recommendations are incorporated except for the provision regarding the removal of Paragraph G.

Revise Paragraph G as follows. G, electrically isolated metal alloy fittings in plastic pipelines under this section not meeting the criteria contained in Paragraph F must be cathodically protected and maintained in accordance with the operator's integrity management plan.

MEMBER PEVARSKI: Second.

CHAIR GANT: So Sue made a motion and Rich seconded. Okay, thank you. Cameron?

MR. SATTERTHWAITE: All right. Aye, nay, or abstain. I'm going to do the roll call. Paula Gant.

CHAIR GANT: Aye.

MR. SATTERTHWAITE: Cheryl Campbell?

MEMBER CAMPBELL: Aye.

MR. SATTERTHWAITE: Andy Drake?

MEMBER DRAKE: Aye.

MR. SATTERTHWAITE: Sue Fleck?

MEMBER FLECK: Aye.

MR. SATTERTHWAITE: Rich Worsinger?

MEMBER WORSINGER: Aye.

MR. SATTERTHWAITE: Bob Hill?

MEMBER HILL: Aye.

MR. SATTERTHWAITE: Bob Kipp?

MEMBER KIPP: Aye.

MR. SATTERTHWAITE: Richard Pevarski?

MEMBER PEVARSKI: Aye.

MR. SATTERTHWAITE: It's unanimous.

CHAIR GANT: Thank you, sir. Max, back to you to walk us through the plastic pipe installation aspects.

MR. KIEBA: All right, plastic pipe installation. The number covered in this proposal for trenchless excavation, joint plastic pipe, qualifying joiners -- sorry, qualifying joint procedures, qualifying persons to make the joints, bends, general installation, service line connections, and maintenance.

We'll go through the list, but I think it's fair to say we got a number of comments, most on trenchless excavation and maintenance.

So, for installation by trenchless excavation, the proposal was to require backfit installations near underground structures. We also have a proposal for requirements to use a weak link during pull-through.

For joining plastic pipe, mechanical fittings must be in the list of specification. I mentioned the enclosed number of standards for mechanical fittings.

We had language, the proposed language clarification, particularly on the use of solvent cements, to make it clear that it's restricted

only to PVC pipe. I think everyone knows that, but the proposal doesn't clearly say that.

And as part of that, too, we point to a specific ASTM standard that is incorporated in 2513, but this is the solvent you need to use, because what we've seen is sometimes maybe some of your folks working out there, maybe plumbers working on the customer service side, something else, might go to Home Depot and find some solvent that might not be the appropriate one to use. So we just then clarified what solvent you have to actually use for PVC. And this clarification that heat fusion requirements apply to both.

Overall, for trenchless, overall general support. We did get some comments that it exempt services below one and a quarter inch IPS if it's supported by incident history.

For weak link device, overall support of the intent, but there was a request for flexibility in the definition of a device, primarily, using other methods. For instance, if

you don't have an actual, physical device, the weak link, for instance, methods for using a less strong plastic pipe which might pull through, that that method allowed too as the device or method.

Some were opposed entirely and recommended holding a working group or some even said a workshop. Frankly, I don't think this is something we need to spend money to have a workshop for, but there were comments regarding to that.

For overall safety enhancements, requiring operators to verify that the pipe is undamaged after pull through. Some did suggest we require use of tracer wire, which, again, it's a common, very common use. But again, the code does not explicitly say that.

We require positive identification of underground structures. So even take the proposal in the code to actually refer to positive identification. And I will say, there should be some acknowledgment, this does get

tricky, particularly in some places where you may not be required to mark every single sewer line.

On underground structures, the concerns in general, there was feelings the operator should only be responsible for providing clearance from known structures at the time of installation.

There were some suggestions to have a list of compliance actions that should be provided, or drop this provision entirely. There was a suggestion just written cross-bore performance procedures should be sufficient.

Okay, that's overall (g)(1). We'll go to staff organizations later, because we kind of patched this all together.

(G)(4), joining plastic pipe, the comments should overall support. We did get comments in the NPRM. We proposed a limitation of an inch and a quarter for socket fusions and we got some comments, primarily from the APGA that did say a number of their members are using socket fusion above inch and a quarter, up to

four inch in diameter in some cases. And they felt it was not economically better alternatives in other options.

We got some requests for clarification to specify. So from a fusion procedures standpoint, we propose to point to this ASTM F2620 kind of as a baseline guide versus the generic language found in the code. But that standard, it should be acknowledged, only applies to PE.

As part of that too, there were some comments we got on, for instance, an operator might be using something that deviates slightly from 2620. In some cases, it might be more stringent, and would that still be allowed or are you still cornered into this 2620?

There were questions on whether joining requirements apply to joints in factory assembled guises as well.

So other parts of the installation are joining procedures. Our proposal was to incorporate by reference current standards for

PE, PA-11 and 12. And again, qualifying persons to make the joints, suggestions suggested ASTM F2620-12 is an option for maybe operators, again, to raise that minimum bar in the joining procedures.

For bends, the minimum bend radius as specified by the manufacturer.

For installation, we did have a proposal in there to revise the minimum wall thickness to 0.90, and that was kind of intended with the moves to 0.40.

But it was pointed out by some commenters that we do have other parts of the code that are still at 0.062. I think the staff did agree with that. We don't want to certainly conflict with that other pipe standards still under the other design factors.

A proposal to revise requirements for protection of plastic pipe inserted in metal casings or on bridges, we did propose backfill requirements. We also proposed to permit above ground termination of certain gas mains for

service lines. Again, we proposed the category one joints across the board, particularly in the service line connections to mains.

For equipment maintenance, plastic pipe joining, we proposed minimum maintenance and calibration requirements for drilling equipment. And we have nuances in there on what's required for equipment calibration.

Okay, so, comments we got in for qualifying persons to make the joints, there was a feeling that if you require 2620 as the sole go-to, it would require re-qualification of approved procedures.

Backfill requirements were opposed by several commenters, particularly the more prescriptive requirements we have in there and also some of the language in there.

Overall, there was support for the intent of recordkeeping for equipment maintenance, but there was a feeling those requirements were too prescriptive and burdensome, particularly all the recordkeeping

you have to have. And this is everything from calibrating your equipment, fusing, joining, and other aspects.

So, the staff recommendation for trenchless excavation, just to clarify expectations, I think Cameron has a link there to some proposals. I don't know if we want to go step-by-step.

So here's the thoughts from the technical staff based on the comments received. Each operator shall take practicable steps to provide sufficient clearance for installation and maintenance activities from other underground utilities and/or structures at the time of installation.

To be quite honest, we had concerns with this whole "known" because we thought that would be too much of a loophole where an operator can say, "Oh, we didn't know there was another structure." I know that's not the intent, and I know it's an issue. But from a rulemaking or a, sorry, code aspect, unfortunately I can see, and

some more staff could see, that there is a potential for someone to try to argue that. If the Committee feels strongly that we should have that "known," again, we're willing to accept that.

So I think that's trenchless, at least this whole -- so I don't know. This is the part where you can either take it step-by-step or we can go through the whole thing.

CHAIR GANT: Okay. I'd like to go through all of them, if that's okay.

MR. KIEBA: Okay. So, weak link, we did agree, device or method. So we agreed, you know, the requirements should be performance-based.

We agreed to remove socket fusion diameter restrictions entirely, because, you know, we thought inch and a quarter, because that was what we felt where other operators were going, but I don't even know if 4-inch is the right number, so we just -- we suggested to remove it entirely.

And, essentially, you are going to refer to whatever the standard says, so that's what number should be available. So the staff agreed with those comments.

Dropping enhanced backfill requirements. So looking at the code, there is other parts of the code that do talk about backfill, so the staff's thought is to just drop those backfill requirements entirely and still make it clear that you have to comply with those other sections.

Cameron, do you want to look at -- sorry. I'm talking about this, but do you want to look at the remove socket fusion first just so people can see the language?

Oh, so this isn't the modified language. So, how it would read is, the socket fusion joint must be joined by a device, et cetera. And we would delete that last sentence.

Backfill requirements. Is this what's proposed or the new --

MR. SATTERTHWAITE: That was what was

proposed.

MR. KIEBA: Oh, okay. Do we have slides on the modified? Because we went back and forth about some -- I'm sorry, some states had this comment about deleting the rocks and size, so we removed this entirely.

So this is what's proposed? Okay. So here we got some across the board, some folks thought it was onerous, particularly -- yeah, I'm looking at the calibration part. I think it's mostly back to maintaining records for the life of the pipeline.

We got comments from, is it reasonable to do life on the pipeline for others? And would it be more reasonable to do between inspection cycles or based upon the manufacture recommendation? For instance, if the manufacturer suggests you calibrate it every next period that's what you do versus keeping all these records for the entire life of the pipeline.

And some had concerns on all the

equipment we listed out, particularly everything from fusion equipment, et cetera.

So I guess this is also where we kind of need Committee input on, is this reasonable, should we just delete (c) and (d)? Do we have the comments that came in? I feel like we had some comments on deleting some of those paragraphs.

CHAIR GANT: So while you are thinking about that, let's go back up the top and open it up for Committee comments, questions on trenchless excavation and the suggested clarification of expectations.

Cheryl?

MEMBER CAMPBELL: Cheryl Campbell, Xcel Energy. So I understand what you are saying, Max, that it's easy to kind of help make that and I'm just looking for a solution to that.

Because I think -- I'm not a lawyer, I don't want to be a lawyer, I know we have some in the room with us -- is there something behind take practicable steps, you know, from a legal

standpoint that suggest that, yeah, you've taken those steps necessary to determine that. And does that give us all a level of comfort that you actually did -- you know, you don't want to use the term "best efforts," and I understand that's got a very serious legal connotation to it. But do you know what I mean? Does that "take practicable steps" have enough information behind it from a legal standpoint to get us to where we're comfortable that operators are going to give it a good try?

CHAIR GANT: Rich?

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. Yeah, my concern is, again, with that "known." I don't think you are going to find bigger advocates for the "one number to call" more than those in the natural gas industry.

We take every effort to find out what's in the path of where we are going to dig because we want others to do the same thing. There is nothing that upsets me more than when my

guys hit something that they should have known was there.

With that being said, there are things out there we don't know what is there. There are people who do not participate in One Call, they are exempt from it, and then there's others that there is just unknown stuff out there.

We don't have a practical way to do that unless we hand dig the entire way. There's just -- there's no practical way to determine if there is something out there where we are going to be digging.

That's why One Call was created, to get those who operate underground systems to properly mark their facilities. So I would request that "from other known underground utilities," but for "known" be put in there, recognizing that we work to comply with the One Call.

CHAIR GANT: Sue?

MEMBER FLECK: Sue Fleck, National Grid. You actually made a compelling argument

there. I'm not sure mine is anymore, but I'll say what I intended to.

I was going to say maybe what you want to do is add "take practicable steps to identify and provide," you know, the rest of it can stay the same.

So what you're basically then saying is you're not expected to know everything. There could be some buried swimming pool, who knows, something underground, but you are responsible to try your best to find and fix the stuff that's there. So I'm just throwing that out as an option.

MEMBER PEVARSKI: I would agree with Sue. And, Rich -- Rick Pevarski, Virginia 811. I would not agree with Rich. I would like to see, to not have the "known" in and included in the language.

Too often, you know, because sewer laterals, water laterals, if something doesn't get located within the correct amount of time,

technically they are not known, but there are still procedures and processes you could do to recognize that they are there and avoid them.

And you have the cross-bores, there are sewer laterals, that are unmarked and there are procedures that an installer could do to make sure that they are not going through that.

The same thing with water. We had an incident in Virginia not too long ago where it was an unmarked water lateral and it got nicked, the gas line got installed, and the pressure from the minor hole did actually put a hole in the plastic lining and it ignited, and there was an incident from that.

And that was an unknown water line, but the installer could have seen that new water was going through that and been looking for that, did a sweep with their own pipe horns and located it.

CHAIR GANT: Any other comments? Rich?

MEMBER WORSINGER: Rich Worsinger,

City of Rocky Mount. Just a follow up to Rick's comments, and I can give you a couple of recent examples.

We know who in our territories participates and marks out their facilities and who does not. The neighboring town from where I am in Rocky Mount, we have a gas system there, I won't call them by name, you can look on a map and figure out who it is, but they don't mark out. They don't participate in One Call, so we've got to call them directly to mark out their facilities. And we do that.

We also know when we are going down the street that each house has got a water line to it and each house has a sewer line to it. And if it's not marked, we know that we've got to get up with the water company that's responsible for that area to mark that sewer line and mark that water line.

Most recently we had a gas line being installed in the development I happen to live in. And in that development there is a golf course,

and that golf course has its own watering system that draws water from a lake.

Well, the contractor we hired knew that, and before he started he contacted the golf course and said, "please mark out the water line," and they did.

I think you're going to find that industry does what we need to. We're going to be responsible if we hit it, but then also to be, you know, dinged for being not in compliance, also, if we hit something that somebody didn't mark out -- I think we need to come up with another word there.

CHAIR GANT: So it seems like we're getting to a new level of understanding in this text. The "taking practicable steps" modifies everything that comes after it and to me after, with the two examples that you just shared and how you approach it operators are taking the practicable steps to understand what is there.

MEMBER WORSINGER: Yes.

CHAIR GANT: So it seems like that

modifies everything that comes after it. And so the practical steps might eliminate the need to have "known," if you read it from start to finish, as an acknowledgment as that you are taking those practical steps to provide sufficient clearance for installation and maintenance activities from underground utilities.

Then, if you took those practical steps, and it still wasn't apparent there were underground utilities that you've interacted with, you can still be covered, correct?

MEMBER FLECK: It seems like it, yes. I think so, yes.

CHAIR GANT: While the Committee considers that, I'd like to ask for comments from the public on this point.

MEMBER FLECK: Just speak up, Andrew.

MR. LU: Andrew Lu, American Gas Association. So, I appreciate the discussion. I'm a little bit curious to know what sufficient clearance actually suggests. There are a lot of

industry standards that are out there, including CGA as a best practice, which delineates what that clearance would be.

And it just seems like to codify something like this is a really big deal. I agree with Rich completely. You're basically holding the utility, the gas utility, accountable for knowing where everything else is underground, not just the utilities, but structures in there as well, old abandoned things. You'd basically have to do an open excavation to show that you are in compliance with that.

MEMBER KIPP: Yeah, just to piggyback onto what Andrew said. There was an explosion in South Riding in the '90s, and it was a gas line in the same common trench as an electric line. And the electric line had been damaged somehow during installation and it arced and melted the gas piping.

It leaked into a house in South Riding, not too far from here. I think that a couple people were killed and their house was

destroyed, and that's where you came up with the best practice and said 12 inches would be your separation. So there is a best practice on some of those gas lines.

However, related to that point, we should -- practicable steps -- and practicable steps, you know, obey the One Call laws, call 8-1-1, maybe put some words in there, because, yes, I believe that 90 percent of the people do the right thing, but I think you'd want to make sure that the other 10 percent that might not.

MR. KIEBA: Yeah, and I'll just jump in. I mean the practicable steps, I think this is an area where be careful what you ask for. I don't think you want PHMSA to identify that for you, because we've had those issues where PHMSA said "here is what you need to do."

I disagree respectfully with the comment about the trench. There are technologies out there. In my former R&D life I actually was designing a system that could go in the ground and see other utilities.

Granted, it's complicated, whether it's smooth or not. So it's technically possible, but there are a number of options. And I agree, there's a number of standards out there, guidance, let's look at what those are doing.

I know CGA does some great stuff, the State of Minnesota, some other operators are very open. And Southwest Gas is one great example, some of their sewer lateral inspection programs. So let's look at all those.

But this an area where, again, I'd be careful of PHMSA identifying. This might be an area where we get a task group together or maybe provide some guidance.

One other thing is I am on this state PHMSA plastic pipe working group, but what we did was states, and it's out there on the DIMP website. It just gives some ideas of what some operators have done, but, again, it's not -- just giving you ideas.

This might be an area, you know, you get a task group together, but you don't want

PHMSA to identify for you.

Sufficient clearance is another area where, yes, there is no clear -- I know some states are doing what's the separation requirement, and it's 12-inch in some cases. Yes, especially if you have transmission in other areas unless you can prove, you know, to keep it under code.

Again, I think this is one area you don't want PHMSA telling you what that clearance is. I mean, at a minimum, yeah, when you are doing that first bore hole in, you want that clearance, but when you come back -- again, you don't want PHMSA to identify what those are.

MEMBER KIPP: Yes, just the 12 inches of radial separation issue was to satisfy requirements from NTSB that we provide data back to NTSB, and that's how that came about.

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. Is the word we want there "practical" or "practicable?" Right now that says -- we read "practical," but it says

"practicable." Now, I'm an engineer, not an English major.

MR. MAYBERRY: This is Alan Mayberry. You know, I'm still trying to grasp that practicable, you know, we use that a lot in rulemaking. You know, whatever works, and, of course, it's not defined, so it's subject to the guidance we develop. So, you know, you can say positive steps, but, you know, practicable seems like, well, do it if it's practicable, but, you know, there might be some discretionary area there.

So something like be proactive to determine how to take positive action, positive steps to consider, you know, clearance. I mean, I think, you know, it's not perfect, how do we get it as close to perfection as we can?

When you're trenchless excavation you need to consider the clearance. You need to know what you are working with and you need to know your equipment and you need to know, you know, the practicable steps and to look for what's out

there and to look for obstructions and take action.

So, you know, does practicable get us there or should it be proactive or take action?

MR. KIEBA: And just for consideration, another commenter did just say this changes completely, this saying you must have cross-bore procedures, but I don't even know if that -- you know, that's almost too generic, right, so --

MEMBER WORSINGER: Rich Worsinger, Rocky Mount. Question, PHMSA: what is it specifically you are looking for us to do? Is it to not only call the various locate services in each state, depending where we are, but also to have a knowledge of our system and the knowledge of those who are in our area who don't participate?

I mean, I could tell you, the thing that we do hit the most are septic systems that have been abandoned. And the homeowner doesn't know they are there because, you know, the septic

system was abandoned 30 years ago, they're now tied into water and sewer, water and sewer is marked, and we hit a septic sometimes, and the people don't have a knowledge of it.

MR. MAYBERRY: Yes, I think we would look to -- you know, Bob mentioned best practices developed by CGA that give a framework.

MEMBER KIPP: Yeah, Bob Kipp, CGA. Just one more comment on abandoned facilities. New Mexico will examine all of their gas distribution damages, and New Mexico is not a big state, but we looked at every single damage and 32 percent of their gas distribution damages were due to abandoned facilities. There are a lot of abandoned facilities, and it's not just gas facilities, it's septic tanks, it's water, all sorts of things.

So it's critical, I think, that you look at all the best practices.

MR. KIEBA: And I'll just say the no-brainers: the real intent is let's stop those cross-bores, right? We have all this guidance

out there and we still have cross-bores incidents where gas is melting the sewer and, again, a homeowner thinks they got a sewer backup, next thing you know there is gas in your house and that goes boom.

I mean that's what's happening still. It's like, so how do we fix it? So if nothing else, we need something in the code to make it clear: let's fix it. How we get there, I don't know.

CHAIR GANT: So what I am hearing from PHMSA staff is the intention being to avoid cross-bores. What I am hearing from the Committee is there is some concern that what should be referenced upfront is the best practice, or some reference to industry practice in some way, but we don't seem to be coalescing around any language to that effect.

MR. KIEBA: This might an idea where GPTC can look at it. I know we don't directly reference GPTC. But if GPTC can take it on, CGA, or any others who might be able to put an FAQ out

there, just say, hey, here is some guidance out there, and that gives you an indication of here is the leading ones and basically say that's what you have to follow. That might be an avenue.

MR. MAYBERRY: I guess the only thing I could add would be to get something around as to say relevant -- you know, practicable steps using relevant use of the practices, or the practices to prevent damage. Using relevant practices.

Again, it's difficult, because, you know, we're not defining this, we're trying to get enough clarity here and then supplement this with guidance.

CHAIR GANT: So I think that brings to a point that it appears we have a difference of opinion on the Committee between wanting specificity versus leaving it more general, because the more specific that we get the more it begins to look like a rendition of a standard or practices already in place or codified elsewhere.

So, thoughts from the Committee in

response to how to address that?

Is it possible that we're coming to a language here, or to a couple of observations back to PHMSA staff? Rich?

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. I think adding Alan's modification there provides me more comfort that -- and I'd be comfortable then striking that "known" before underground utilities.

That this is -- we're not going to be held accountable for the unknown facilities out there as long as we take practicable steps using relevant practices.

CHAIR GANT: Observations from other Committee members? Sue?

MEMBER FLECK: Sue Fleck, National Grid. I'm more comfortable with that language. I think, to Max's point, where we were more interested in a cross-bore than an active utility, because that's where you have -- (Audio interference) -- than an abandoned septic system or something like that where you're not going to

really, you know, get hit by somebody running a Roto-Rooter through there.

I could go either way. I prefer having "known" in there because you are saying "known utilities." It's kind of forcing you to go and figure it out, but I think, yes, I am comfortable with the changed language that we have a little bit of flexibility.

We just have to think about how our regulators will inspect us against this code and will they feel that, you know, relevant to this is okay.

CHAIR GANT: Okay. So for now, let's use this as a placeholder on the motion text, and let's move to weak link.

MR. KIEBA: I think I got a lot of nodding heads here if we just say device or method. I think that fixes it. And I think I got nodding heads if we just remove the inch and a quarter restriction entirely.

And, yes, backfill, do we want to just drop that entirely? I think that's the feeling.

MEMBER FLECK: Yeah, it's already covered.

MR. KIEBA: Let's go to equipment maintenance, because -- yeah, pull that up for me. Here was one where, if I recall, someone help me out that commented, but I feel like we got comments to just limit it to (a) and delete everything else, (b) through (d).

I think (c) and (d) are the ones that had the most scrutiny, but -- so essentially the first part would be essentially what is required. I am hearing a yes?

MEMBER FLECK: Yes.

MR. KIEBA: Okay. So I'd like thoughts from the Committee, if anyone is concerned if we just delete (b) through (d). Anyone have concerns if we just leave it as the first paragraph?

CHAIR GANT: Rich?

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. I agree, leave (a) in there and strike (b), (c), and (d).

MEMBER FLECK: Agree.

CHAIR GANT: All right. I'd like to ask for comments from the public on these four proposed changes.

(Pause.)

CHAIR GANT: No one wants to step up to the microphone that doesn't work?

(Laughter.)

CHAIR GANT: Okay, great. With that, could we see that on the draft recommendation text, please?

MR. SATTERTHWAITE: I'm going to copy this information real quick and bring it to the vote slide.

CHAIR GANT: Great. Sue?

MEMBER FLECK: Sue Fleck, National Grid. While Cameron is doing that, can I ask one clarifying thing? And I think, Max, this was in your opening comments. The ASTM F2620 is an option, it's not the only?

MR. KIEBA: Right.

MEMBER FLECK: Okay.

MR. KIEBA: And I think the intent would be, first, yes, we clarify it's PE only, but the thought is, you know, F2620 --

MEMBER FLECK: Got it.

MR. KIEBA: So, clearly, if a manufacturer -- or, sorry, an operator was doing something that's more stringent, they would demonstrate how it might deviate, but that's in there.

MEMBER FLECK: Thank you.

CHAIR GANT: Okay. While Cameron is practicing his tremendous typing skills in front of all us, I would like to ask Committee members to consider the motion, the draft motion text, and ask for a motion.

MEMBER CAMPBELL: Okay, all right, I'll give it a shot, Paula.

CHAIR GANT: Go for it.

MEMBER CAMPBELL: Okay. Cheryl Campbell, Xcel Energy.

The Technical Pipeline Safety Standards Committee finds that related to plastic

pipe installation, the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost-effective, and practicable if the following changes are made.

Trenchless excavation, clarify the expectations as per the PHMSA recommendation.

Weak link, change to device or method, remove socket fusion diameter restrictions, drop enhanced backfill requirements. Operators would still have to comply with the existing requirements in Section 192.319(b) and 192.361(b).

In equipment maintenance, delete 192.756, Paragraphs (b) through (d).

MEMBER HILL: I'll second that.

CHAIR GANT: Excellent. We have a motion and a second. Moving on to repairs.

MR. SATTERTHWAITE: With that, your aye, nay, or abstain. Let's do a quick roll call. Paula Gant?

CHAIR GANT: Aye.

MR. SATTERTHWAITE: Cheryl Campbell?
MEMBER CAMPBELL: Aye.
MR. SATTERTHWAITE: Andy Drake?
MEMBER DRAKE: Aye.
MR. SATTERTHWAITE: Sue Fleck?
MEMBER FLECK: Aye.
MR. SATTERTHWAITE: Rich Worsinger?
MEMBER WORSINGER: Aye.
MR. SATTERTHWAITE: Bob Hill?
MEMBER HILL: Aye.
MR. SATTERTHWAITE: Bob Kipp?
MEMBER KIPP: Aye.
MR. SATTERTHWAITE: Richard Pevarski?
MEMBER PEVARSKI: Aye.
MR. SATTERTHWAITE: It's unanimous.
CHAIR GANT: Excellent. Now moving on to repairs.
MR. KIEBA: Repairs. We felt these were relatively non-controversial. Well, I would say we -- I'm sorry. I think in the effort of deleting some slides we deleted some content.
I would say the one part of repair

somewhere in the code or the provision we had the 10 percent repair criteria. I would say we did get some comments whether that was appropriate, if, you know, should it be 20 percent, should we remove that completely based on, particularly, some newer materials.

On prohibition, yes, another piece on this on prohibiting permanent use of temporary leak repair clamps. So this is an issue we have seen where, you know, if there is an incident someone might put on a leak clamp to stop the flow, next thing you know that thing stays in the ground and they never come back to repair it.

I know most operators do, but there is a couple that we have seen not, so we have a proposed part in the code that just says they are not allowed for permanent -- or, sorry, temporary repair.

So now we're on (i), a number of general provisions. I would say plastic pipe material is probably the biggest one there and that's where we prohibited the use -- the use of -- so we

proposed to prohibit the use of PVC pipe in components for new pipelines. And this was kind of following an industry trend for a couple of decades to just stop using PVC.

It should be noted, we still have a fair amount in the ground, and I think I pulled up the numbers and it's, as of at least 2014, we do have 11,000 and change miles of mains still out there for PVC. We still have 131,000 services.

We did propose to incorporate F20817 maintenance standard, but we proposed it to apply to components only.

So for material parts we had some suggestions for minor clarifications for component design standards. We did get some comments to adopt more recent editions of standards, and I think we had that discussion earlier, we just can't do that in the context of this rule.

We certainly have them all listed and I think whenever it's appropriate at the next

standard update rule we'll look at that.

There were suggestions to clarify that the simple generic storing and handling procedures developed by third party are acceptable.

Restriction on PVC pipe, overall there was support, but there was one trade association that was strongly opposed to it. And I would say there was one operator that did give us some good scenarios where there are low-risk applications, such as vent piping, where they are using PVC. So it's a good point. It's technically part of the system. Does that mean they can't use it for vent piping anymore?

We also got comments to exempt EFVs as part of the listed specifications, because we just have the EFV rule, and I don't even think it's final yet, but it was noted that we did not incorporate the EFV standard specifically.

So I would suggest let's talk about PVC because that's the bigger one. I would say, from a staff perspective, we have considered a

couple angles.

One is just removing it completely, the whole prohibition of the 192.59 materials, and just let DIMP work it out. And I think that's probably the easiest scenario.

Another option, potentially from the comments, if people feel strongly we should take it out, and maybe perhaps say something like "except for PVC used for repairs or non-risk applications such as vent piping."

Do we have any of that modified language in there?

MR. SATTERTHWAITE: No.

MR. KIEBA: Okay. So we went back and forth on that, but I think, obviously, the easiest one is let's just take out (e) completely, but unless someone feels strongly then we still need something in the code to address PVC. Or, yeah, discuss the use of certain low-risk applications.

So, again, do you want to add language to talk about low-risk or are you just deleting

(e) completely?

And I think the staff agreed, let's exempt EFVs, because we are still having the EFV rule, let's not conflict with that. I think most people will probably agree with that one.

So we'll have the language, right, except for the EFVs. Except for EFVs a valve must be a listed specification, but that's where the staff was going with that. That's it.

CHAIR GANT: Questions, comments, from Committee members? Rich?

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. Can we go back and just kind of go through these in order?

MR. KIEBA: Sure.

MEMBER WORSINGER: I believe the repair criteria was 10 percent with what was being proposed. I believe PHMSA already requires that each imperfection or damage that would impair the serviceability of the plastic pipe must be repaired or removed. PHMSA has not offered technical support when 10 percent of the

wall thickness is the cut-off and above which the serviceability of the plastic pipe is impaired.

Twenty percent is the industry recommendation for manufacturers and industry organizations. In addition, the only industry research available on scratch or gouge is that from a plastic pipe investigated scratches and gouges up to 30 percent wall thickness.

MR. KIEBA: Yeah, I have it here. The proposal was in 192.311, Repair Plastic Pipes. So (a) says "each imperfection or damage that would impair the serviceability of plastic pipe must be repaired or removed," that was (a).

I think the concern was the (b) part that says "all scratches or gouges exceeding 10 percent of the wall thickness of pipe and/or component shall be repaired or removed."

So I think we've got a number of comments. Probably the easiest one is just delete (b) completely, or do we want to go to 20 percent, you know, what we do?

You know, if we just leave (a) in

there, do we need to push what that number is?

CHAIR GANT: Is there comments from Committee members on removal of (b)?

MEMBER FLECK: Sue Fleck, National Grid. I recommend removing (b) because I think it's within our decision to kind of -- getting back to the issue between integrity management programs and everything.

We may choose to replace a 5 percent scratch, and, you know, if you work in 10 percent you're saying to us we're not going to look at anything below that.

I think it's incumbent upon the operator to understand their risks and to take the appropriate steps. I don't think (b) is necessary, I really don't. I think (a) puts the onus on us and we could be held accountable. I'd remove (b).

MR. KIEBA: So essentially that wouldn't change anything, because the code right now, let's be clear, that there is no changes then to this part, so we'd just leave the code as

it is.

CHAIR GANT: By removing like the (b) from the -- okay.

MR. KIEBA: Yes.

CHAIR GANT: Okay. Are there other comments on repairs or other general provisions?

MEMBER CAMPBELL: Max, Cheryl Campbell, Xcel Energy. Is there a reason that PHMSA might propose (b) with a 10 percent rule? I mean, what's behind it?

MR. KIEBA: Honestly, just trying to follow what the general guidance has been. I think most of our technical staff would agree that 10 percent was based on more vintage piping, and so even the studies that were done on the 10 percent. So I think the intent would just follow what the guidance has been through the years, particularly in cases where operators aren't doing anything for scratches or gouges.

I know it's not these operators in our room here, it's the ones out there that -- but that was the intent. But I think we'd agree, you

know, that it could be 20 percent, it could be more, so --

MEMBER CAMPBELL: Okay. I would agree with just removing (b).

CHAIR GANT: Okay. Rich?

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount. I just want to comment on the leak clamps.

I'm in agreement that leak clamps should not be used for permanent repair. I had a concern though that this was added to Subpart M. Subpart M, I believe, is one that is retroactive.

MR. KIEBA: It is.

MEMBER WORSINGER: And I have a concern that where these clamps had been used, not all operators have records of where they used them, and we would not want this applied retroactively.

MR. KIEBA: Yeah, I think we have already said we intend those rules not to apply retroactively, so we would have to add something or anything after the effective date of rule.

CHAIR GANT: Okay. Any other comments on general provisions or repairs? Sue?

MEMBER FLECK: No more comments on that, but -- this is Sue Fleck, National Grid. But what I think the recommendation should be, is there a way to look in the future for some kind of repair clamps or do some research on that to see if there is something that could potentially be used in the future? Because the concept isn't a bad one, there is just no leak repair clamps out there that really can be buried and left there forever. But the concept is a good one.

If we could have something that you could mechanically put on a pipe and repair it forever and bury it, that would be a good tool to have in the toolbox.

So it might be nice to figure out how we could get something like that for in the future.

MR. KIEBA: Yeah, and some people pointed to, for instance, electrofusion jointing or electrofusion fittings, could they be applied

both as reinforcement, as a leak repair, and I think that's reasonable to look at.

MR. MAYBERRY: Just a point on that, Sue, I think, or, Paul, years ago there was some work done on that, on repair clamps, and a prototype was built, but I'm not sure if it was actually ever commercially used or sold.

MEMBER FLECK: It would be nice to have. It would be nice to have, I think.

CHAIR GANT: Okay. I don't see any other comments from the Committee. Andy?

MEMBER DRAKE: This is Andy Drake with Spectra Energy. In fact, I think this kind of recognizes the opposite. I mean, I appreciate the fact that we're trying to provide discretion to the operators to repair what seems to make sense.

The fact that there doesn't seem to be a standard of what the correct criteria is seems like an obvious opportunity. If there is no clear understanding from the technical guidance, you know, 10 percent or any other number, then

it's incumbent on this group to make some recommendation to try to fill in that space.

I recommend we do some research to define what is appropriate repair criteria, because you're never going to get consistency if there is no technical standard of any kind.

So I don't even know what appropriate means. There isn't any guidance to an operator, is what I am hearing, which seems like a clear opportunity from us, you know.

MR. KIEBA: No, you're right.

MEMBER DRAKE: And your point about repair clamps, I mean, I think there's a recognition here that needs to be made through PHMSA to marshal whatever it needs to do to research to try to find the appropriate repair criteria to clarify that.

If the 10 percent is not technically validated, well, what is appropriate?

MR. KIEBA: Yeah. And this is where you might, you know, ask if EPI or others, I know they have the plastic pipe manuals and what not.

But I think if EPI or others could go that direction, I know there is a leak repair clamp standard out there. That design should be out for revision soon. That's another opportunity for the standards, at least on a clamp size. I guess, yeah, it's a question whether we have to put something in the code now to push them along further.

MEMBER DRAKE: It just seemed like an opportunity. And I agree, we need to fill in the space so that we can do some kind of work and understand what is appropriate criteria.

MR. MAYBERRY: This is where I'll put a plug in for our R&D forum which meets every two years, and it's collaborative process where we get input from stakeholders.

MEMBER KIPP: Yes, I agree with Andy. When you look at a permanent use of repair clamps, the only clamp used is for 35 years, it's not permanent.

CHAIR GANT: Before I move to comments from the public, any other comments from

Committee members?

From the public?

MS. SAMES: Christina Sames, AGA. Just on the proposal, I want to make sure that we capture the non-retroactive provisions that was discussed.

CHAIR GANT: Okay. Moving to the draft text for a motion, I'd like to ask Committee members to consider making that motion. I'll give us a few seconds to review this. Rich, do you have a question?

MEMBER WORSINGER: No, I was going to make a motion.

CHAIR GANT: Oh, awesome.

MEMBER WORSINGER: Rich Worsinger, City of Rocky Mount.

The Technical Pipeline Safety Standards Committee finds that related to the section titled "Repairs and General Provisions" the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost-effective,

and practicable if the following changes are made.

Clarify that provisions regarding leak clamps are not retroactive.

Remove 192.311(b). However, the Committee should support research for development of industry-wide standards for repair criteria. PHMSA should research use of permanent leak repair clamps.

MEMBER KIPP: I'll second that.

CHAIR GANT: Excellent. Cameron, over to you.

MR. SATTERTHWAITE: All right, we'll start through the roll call. Of course, you know, your aye, nay, abstain. Paula Gant?

CHAIR GANT: Aye.

MR. SATTERTHWAITE: Cheryl Campbell?

MEMBER CAMPBELL: Aye.

MR. SATTERTHWAITE: Andy Drake?

MEMBER DRAKE: Aye.

MR. SATTERTHWAITE: Sue Fleck?

MEMBER FLECK: Aye.

MR. SATTERTHWAITE: Richard Worsinger.

MEMBER WORSINGER: Aye.

MR. SATTERTHWAITE: Bob Hill?

MEMBER HILL: Aye.

MR. SATTERTHWAITE: Bob Kipp?

MEMBER KIPP: Aye.

MR. SATTERTHWAITE: Richard Pevarski?

MEMBER PEVARSKI: Aye.

MR. SATTERTHWAITE: It's unanimous.

CHAIR GANT: Okay.

MR. GALE: Thanks, Paula. We have one slide to make sure we captured all that. We have one final motion to be heard from the Committee. We have one final slide. We wanted make sure we captured everything accordingly. If we could get a motion we would appreciate it, Madam Chair.

MEMBER HILL: The Technical Pipelines Safety Standards Committee finds that the proposed rule as published in the Federal Register and the Draft Regulatory Evaluation are technically feasible, reasonable, cost-effective, and practicable if the amendments agreed upon

during this meeting are made.

MEMBER WORSINGER: Second.

CHAIR GANT: Seconded,, excellent, okay.

MR. SATTERTHWAITE: Okay, we'll do a quick roll call. Aye, nay, abstain. Paula Gant?

CHAIR GANT: Aye.

MR. SATTERTHWAITE: Cheryl Campbell?

MEMBER CAMPBELL: Aye.

MR. SATTERTHWAITE: Andy Drake?

MEMBER DRAKE: Aye.

MR. SATTERTHWAITE: Sue Fleck?

MEMBER FLECK: Aye.

MR. SATTERTHWAITE: Richard Worsinger?

MEMBER WORSINGER: Aye.

MR. SATTERTHWAITE: Bob Hill?

MEMBER HILL: Aye.

MR. SATTERTHWAITE: Bob Kipp?

MEMBER KIPP: Aye.

MR. SATTERTHWAITE: Richard Pevarski?

MEMBER PEVARSKI: Aye.

MR. SATTERTHWAITE: It's unanimous.

CHAIR GANT: Excellent, thank you.

Okay, our final item on the agenda for this afternoon is to receive a briefing from Robert Smith on the National Academy of Sciences study on rulemaking.

MR. SMITH: Yes. Well, thanks, Paula and Alan and the Committee, for the opportunity to give you a summary of the study.

I'm Robert Smith, I am just the Project Manager on this particular one. At the time, Jeff Wiese was the subject matter expert and really providing, you know, the kind of time in on this study. I know it's now going to be Alan, so he's got some shoes to fill with that role.

Let me begin to try to attempt to convey why Jeff Wiese wanted to do this study. As you may know, he commonly hires contractors for produced knowledge, general knowledge, whether it be the Academy or any other means.

And sometimes, as you know, we deal with many stakeholders and so it's important if

we want to pursue an activity or an agenda, we'd like to see, you know, how can we raise up the knowledge level of everybody so we're working for a more common reference point.

That's been done time and time again over the years for our office, whether it be integrity management, whether it be in damage prevention, research, and everything else, so we are just kind of following that type of approach.

So really what this study is, you know, we've done a lot with the Academy over the years, many of those have been congressionally-mandated. This is not a congressionally-mandated study. It's a 21-month study awarded last September, and it goes to May of 2017. So we still have some time in it.

This is, you know, a National Academy of Sciences study which follows their procedures and protocols. They've spent a number of months just organizing the committee. They've had one public meeting so far and there will be several more as they begin to hear from subject matter

experts.

So what's the study going to do? Well, it's going to look abroad, look domestically, look at other industries, and really kind of understanding advantages and disadvantages of utilizing descriptive versus performance-based regulation.

Trying to understand where there is more opportunity to expand upon performance regulation and try to understand where there are constraints preventing the expansion of that.

The committee, as shown on the handout, and I'm sorry there is now a slides for this, but the Committee made up a subject matter --

MR. GALE: Sorry, Bob, we provided handouts on that.

MR. SMITH: Oh, okay. And I think everything is going to be put on the docket afterwards, as I recall, so this should be for everybody in the public as well.

The Committee is made up of a lot of

different subject matter experts. We're going to have subject matter experts from all the trade organizations I do believe, so thank you for all the pipeline trade organizations, the liquid, gas transmission and distributions, both public and private, are participating with the study, I do believe.

Some of us will be presenting at the next meeting on the 12th. You can go look at the website for that information and you'll see all these meetings.

There are some meetings that are public and some meetings are internal. We're going to be hearing from other modes of transportation, offshore versus onshore.

We have Brian Salerno, the Director of BSEE, the Bureau of Safety and Environmental Enforcement, also participating. So, once again, it's kind of early in its stages, there is a few more meetings to go, and we'd love to have the committee here to present more detail perhaps at the next Advisory Committee meeting.

And, with that, that's really all I can say right now.

CHAIR GANT: Thanks, Robert. I will just say that I know when Jeff was speaking about this with Director Salerno, that we had some conversations about this, and I think this is an important exercise to get us the beyond this sort of eternal conversation we are in which technology meets regulation and how those regulations keep up with technology and innovation and as advances in operational practice.

And then we talk about that being a performance-based regulation, but we don't have a robust discussion about how do you develop that in an effective way to ensure the regulatory outcomes you want.

And this was a way to develop a richer conversation about how we develop performance-based regulation. So I encourage people to participate in this. Alan?

MR. MAYBERRY: I would just like to

add that, yeah, this is a very important study.

You know, we found, and certainly it's an area of common interest between PHMSA and our federal partners, and BSEE and Brian Salerno is extremely invested in this, as well as our Canadian partners at the National Energy Board, who also is involved.

As Bob said, it's in the early stages, but I think you'll find, and we found, and perhaps you have noticed, too, that, you know, the aftermath of some of the high consequence, low probability events, we've begun to question the efficacy of performance-based regulations.

As you know, our code is a set of interdependent standards really of performance-based regulations and prescriptive regulations, and in the aftermath oftentimes there is a call for more prescription.

So the purpose of this study, among other things, is just to look at performance-based regulations, and we have a very credible source, I might add, in the National Academy. So,

stay tuned.

CHAIR GANT: Thank you, Alan. Any items that Committee members would like to put on the table before we adjourn?

Are there any instructions for us for tomorrow morning? No yelling tonight, we want you to have strong voices tomorrow in case the mics don't work. We'll see you bright and early tomorrow. Thanks, everyone.

(Whereupon, the above-entitled matter went off the record at 4:27 p.m.)

A

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This is to certify that the foregoing transcript

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Before: US DOT

Date: 06-01-16

Place: Arlington, VA

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

Neal R. Gross

Court Reporter