

U.S. DEPARTMENT OF TRANSPORTATION

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PIPELINE AND HAZARDOUS MATERIALS
SAFETY ADMINISTRATION

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GAS PIPELINE ADVISORY COMMITTEE MEETING

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FRIDAY
DECEMBER 15, 2017

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The Advisory Committee met in the Galleria Ballroom, Hilton Arlington, 950 North Stafford Street, Arlington, Virginia at 8:30 a.m., David W. Danner, Chair, presiding.

GAS PIPELINE ADVISORY COMMITTEE MEMBERS PRESENT
HON. DAVID W. DANNER, Chair; Washington Utilities
and Transportation Commission
STEPHEN E. ALLEN, Indiana Utility Regulatory
Commission
RONALD A. BRADLEY, PECO Energy
MARK BROWNSTEIN, Environmental Defense Fund
HON. DIANE BURMAN, New York State Public Service
Commission*
CHERYL F. CAMPBELL, Xcel Energy Incorporated
ANDREW J. DRAKE, Enbridge Gas Transmission
SARA ROLLET GOSMAN, Pipeline Safety Trust;
University of Arkansas School of Law
ROBERT W. HILL, Brookings County Zoning and
Drainage, South Dakota
RICHARD F. PEVARSKI, Virginia Utility Protection
Services LLC/Virginia 811
TERRY TURPIN, Federal Energy Regulatory
Commission

RICHARD H. WORSINGER, Public Utilities, City of
Rocky Mount, North Carolina
CHAD J. ZAMARIN, Williams Companies

PHMSA STAFF PRESENT

ALAN MAYBERRY, Associate Administrator for
Pipeline Safety; Designated Federal Official
ELOISE CASTILLO, Economist
AMAL DERIA, Attorney Advisor
JOHN GALE, Director, Office of Standards and
Rulemaking
ROBERT JAGGER, Office of Standards and Rulemaking
KENNETH LEE, Director, Engineering and Research
JANICE MORGAN
CHRIS McLAREN, Transportation Specialist
JANICE MORGAN
SAYLER PALABRICA, Office of Standards and
Rulemaking
JAMES PATES, Assistant Chief Counsel for Pipeline
Safety
DRUE PEARCE, Deputy Administrator
CAMERON SATTERTHWAITE, Office of Standards and
Rulemaking
CHERYL WHETSEL, Advisory Committee Manager

ALSO PRESENT

TOM BUBENIK, DNV GL
CORINNE BYRNES, National Grid
THOMAS EAGAR, Sc.D., P.E., MIT
RICK KIVELA, Enbridge

ERIN KURILLA, American Public Gas Association

C.J. OSMAN, INGAA

LEE REYNOLDS, NiSource

C-O-N-T-E-N-T-S

Call to Order. 4

Opening Remarks. 7

Briefing: NPRM

Safety of Gas Transmission and Gathering

Pipelines (cont.). 10

Adjourn. 174

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

2 (8:35 a.m.)

3 CHAIRMAN DANNER: All right. Good
4 morning, everybody. We'll get started and called
5 to order. This is day 2 of the Gas Advisory
6 Committee.

7 And I am Dave Danner. I'm Chair of
8 the Washington Utilities and Transportation
9 Commission. And I will be chairing this
10 morning's meeting as well.

11 This meeting is being recorded. So,
12 just a reminder, speak into the microphone, both
13 for the transcript, and for the benefit of
14 Commissioner Diane Burman of New York, who had
15 joined us on the telephone. Good morning, Diane.

16 MEMBER BURMAN: Good morning. Thank
17 you.

18 CHAIRMAN DANNER: And again, this is

19 --

20 MEMBER BURMAN: Thank you very much.

21 CHAIRMAN DANNER: Thank you. The
22 transcript and presentations will be available on

1 the PHMSA website. It's Meeting number 127 on
2 the eGov docket at www.regulations.gov. And the
3 docket number for this meeting is PHMSA-2016-
4 0136.

5 So, without further ado let's get back
6 into the agenda. Yesterday we closed with
7 discussion of three of the six methods that were
8 listed there. I think yesterday we did pressure
9 testing, pipe replacement, and alternative
10 technology.

11 So, today we can start with the
12 discussion of pressure reduction. And then we
13 can get into ECA and small diameter. So, let me,
14 I'd like to open the floor if there are any
15 comments on those.

16 We have taken public comment on the
17 methods already. So, take your time. So, what's
18 that?

19 CHAIRMAN DANNER: Pressure reduction.
20 Yes. Methods.

21 All right. You need to prime the pump
22 a bit to get the conversations going. All right.

1 We have a tent card up already. So, Andy.

2 MEMBER DRAKE: I thought I'd just do
3 some entertainment here while we get the slide
4 up. You know, yesterday we were hurrying to
5 close yesterday. And I just want to make a
6 couple of comments about particularly the and
7 clause that was going into some of these sections
8 about the small diameter pipes.

9 I think we really need to be
10 thoughtful about that. When we get below 30
11 percent SMYS the discussions that we've had
12 historically in the Code was not eight inches and
13 30 percent. It was 30 percent, because of the
14 leak-rupture threshold.

15 And I don't know exactly why we
16 introduced the eight inch pipe. But I'd like to
17 vet that out a little bit more deliberately. I
18 really think that just as a flyer I don't
19 understand.

20 The reason that was put into place at
21 30 percent was because of the pre-disposition to
22 leak. And that testing wasn't going to help

1 identify manufacturing issues that would grow to
2 failure, or construction issues that would
3 service as a failure at that stress level.

4 And I don't want us, I just want us to
5 be very clear why we're doing what we're doing.
6 Because the eight inches is not in the
7 Congressional mandate. It's not in the basis of
8 the Code. And I don't understand its technical
9 basis.

10 So, I just wanted to put that out
11 there. We didn't really cover that yesterday in
12 the discussion on the small pipes.

13 CHAIRMAN DANNER: All right. Alan.

14 MR. MAYBERRY: This all goes in the
15 category of reflecting on yesterday. From our
16 perspective, you know, we're looking for input on
17 that. And I think we, Steve did cover the
18 methodology for how that was determined.

19 But there, you know, we'd like input,
20 you know, on that. So, if there's another way,
21 either just go straight with 30, if that's the
22 proposal. Or, you know, we're really looking for

1 feedback on that.

2 MR. GALE: Can I also recommend,
3 Chairman, that, you know, that is what we're
4 going to discuss under Method 5, which is the
5 small diameter PIR. Can we just possibly just
6 table that for now, if that's acceptable?

7 CHAIRMAN DANNER: Sure. That makes
8 sense. All right. Chad.

9 MEMBER ZAMARIN: I'll wait until the
10 Method 5 discussion.

11 CHAIRMAN DANNER: Okay.

12 MEMBER ZAMARIN: Thanks.

13 CHAIRMAN DANNER: All right. So, I
14 guess right now we're going to focus on pressure
15 reduction. Any comments from the Members? All
16 right. Ready to move on? All right. Nothing on
17 that --

18 CHAIRMAN DANNER: Nothing on that
19 subject. ECA? Okay. Andy.

20 MEMBER DRAKE: Okay. I'll, I think
21 there was a brief comment that came up yesterday
22 about ECA. And I think it's worth noting. And

1 that, it may go back to some of Sarah's
2 conversations yesterday about data.

3 If, you know, the assumption of
4 fracture toughness at five and one foot pound is
5 very, very conservative. And I think operators
6 will have other data and other means of
7 collecting more conservative numbers.

8 And I really think numbers -- Someone
9 said something of 13 and four. Those are also
10 very conservative, but a little more practicable.
11 I'd at least like some discussion around what,
12 how can we use 607, or some other way of creating
13 caveats to use more practical fracture mechanic
14 numbers?

15 Because that, those numbers are just
16 going to basically create an unacceptable ECA on
17 most pipes if you don't have the absolute
18 numbers. So, there has to be some way for us to
19 use alternative criteria that we have that's
20 conservative, to fill in that blank.

21 And I just want to put that out there.
22 I think those numbers at 13 and four are a little

1 more practical, and certainly very conservative.

2 CHAIRMAN DANNER: All right. Steve,
3 do you want to respond to that?

4 MR. NANNEY: All right. Yes. We were
5 planning to do that.

6 CHAIRMAN DANNER: Okay. All right.
7 Moving right along then I think now we can talk
8 about small diameter. Chad, you want to put your
9 card up again and talk about small diameter PR?

10 MEMBER ZAMARIN: Thanks. Chad Zamarin
11 with Williams. You know, I did recall Steve's
12 presentation on the diameter and the grade. I
13 actually may have misinterpreted it as meaning
14 there was an or.

15 Because he presented that at smaller
16 diameters, even at higher pressures, that they
17 would have relatively small PIRs. And so, you
18 know, I think it works as an or.

19 But, you know, and I think that's what
20 the technical basis would support, that both at a
21 low stress you have a very low likelihood of
22 incident that would cause significant harm. And

1 even at smaller diameter, even at higher pressure
2 you have a very small PIR that would not lead to
3 likely impact.

4 And so, that's how I interpreted it.
5 I may have misinterpreted it. When I read the
6 language it does look like an and. But, you
7 know, I would, I was comfortable with it if it
8 was an or. And maybe we just need to talk
9 through that. Thank you.

10 CHAIRMAN DANNER: So, it does sound
11 like you're inviting some clarification. Anybody
12 from PHMSA like to respond? Okay.

13 MR. NANNEY: All right. Yes. I
14 believe it, Thad, I mean, Chad, I'm sorry. I
15 believe it was a and. And I will consider an or,
16 like -- And we'll go back and look at that.

17 MEMBER ZAMARIN: Thank you.

18 CHAIRMAN DANNER: Okay. Steve.

19 MEMBER ALLEN: Steve Allen, IURC.
20 Just to kind of chime in on that. I think from a
21 small operator perspective, and a state regulator
22 perspective, I think an and would be awfully

1 difficult for the smaller operators. And awfully
2 difficult for us to enforce. I think or is
3 probably more appropriate.

4 MR. GALE: I just need to clarify
5 something for the Committee. If you make that an
6 or you're going to expand that applicability to
7 above 30 percent SMYS. And I don't know if
8 that's your intention.

9 MEMBER ALLEN: Could you say that once
10 again?

11 MR. GALE: If you change that and to
12 an or you're expanding the applicability of that
13 method to above 30 percent SMYS. And I don't
14 know if that's your intention.

15 I'm sorry, Cheryl. What I was talking
16 about was actually in the reg sec itself, and the
17 three conditions of the applicability in Method
18 5. We're pulling it up right now.

19 CHAIRMAN DANNER: Can you make that a
20 little bigger for the benefit of some of us old
21 guys? Not that old.

22 MR. GALE: Can we just put it up

1 there? It was my read that it would actually
2 expand the applicability. And I believe we're
3 trying to limit that applicability to below 30
4 percent SMYS. As long as that's the intention.

5 CHAIRMAN DANNER: All right. Andy.

6 MEMBER DRAKE: Andy Drake with
7 Enbridge. I think this section in particular, I
8 think we may need to -- We promised not to get
9 into wordsmithing, right?

10 But the or/and thing I think we need
11 to, maybe a little bit more separate discussion,
12 right. I think you're right. We only expand it.
13 But I do think there's a combination there that's
14 a problem.

15 My comment actually becomes that
16 somehow these very low risk pipes have become
17 probably encumbered with as many obligations in
18 this section as anything. They've got a lot of
19 and, and, ands here, things they have to do.

20 And I would really encourage PHMSA to
21 look at, many of these things are integrity
22 management issues. We're going to do ECDA.

1 We're going to do IDCA. We're going to do leak
2 detection. Those are all integrity management
3 efforts that have to be saddled to pipes outside
4 of the MAOP confirmation.

5 We can, again, we've had this
6 conversation again. And it just of is a
7 different design flaw. So, you know, we're kind
8 of working our way through the document as we go.

9 But this particular section really
10 illustrates that point quite a bit. That you've
11 got a lot of integrity management issues tied up
12 in here about how to confirm their MAOP. And
13 that's not, I don't think that's what you really
14 need.

15 You're going to get the integrity
16 management discussions separately, when you talk
17 about how to manage threats for 30 percent pipes
18 in integrity management.

19 CHAIRMAN DANNER: Okay. Alan.

20 MR. MAYBERRY: I was just going to
21 say, I know words like or/and matter. So, we get
22 what you mean.

1 CHAIRMAN DANNER: All right. And,
2 Steve.

3 MR. NANNEY: All right. Yes. Steve,
4 Andy, Chad, we understand what you're asking. We
5 will look at it. Again, as a, yesterday as we
6 stated, on the other conditions that we need to
7 look at under this particular Method, we had a
8 number of things, as Andy alluded to, listed.

9 Please go back and, you know, we would
10 appreciate on the docket anything there that you
11 think are more important than others that we
12 should consider going forward. And I think we
13 had talked about that yesterday.

14 MEMBER DRAKE: To be clear, especially
15 to my friends across the table here, I'm not
16 advocating to get rid of ECA, ICDAs. I'm asking
17 it to move to an integrity management section.
18 Not to be eliminated. It just doesn't belong
19 here.

20 CHAIRMAN DANNER: Okay. Sarah.

21 MEMBER GOSMAN: Okay. So, a couple of
22 thoughts. I mean, I think my interest in keeping

1 these pipelines in this system, right, and
2 working through how we actually get to integrity
3 once we're in the system. So, back to this
4 applicability question.

5 I think part of that is that I was
6 looking through my slides to see what the mileage
7 is on these types of pipes. But my memory at
8 least is we're not looking at a large mileage
9 here, in terms of the pipes that we're talking
10 about right now. But I'd love clarification on
11 that.

12 And then, I think, I've been thinking
13 about this distinction between integrity
14 management and these types of, what the National
15 Academy of Science's Performance Based Regulation
16 Report would call sort of micro means types of
17 approaches.

18 And I think the thing about integrity
19 management is that unless we put something very
20 specific in the rules, what we're doing is, we're
21 moving towards less specificity, right, more
22 flexibility. But less of a sense of what this

1 actual method is going to mean.

2 And I keep going back to this issue
3 that we still don't address things like Class 3
4 and 4 outside HCAs. So, that's a concern of
5 mine.

6 You know, I want to make the point
7 that we actually, just in terms of this whole
8 piece of the puzzle, NTSB actually said, just get
9 rid of the grandfather clause. And we aren't
10 there, even with the proposed rule.

11 CHAIRMAN DANNER: All right. Thank
12 you. Chad.

13 MEMBER ZAMARIN: Thank you. Chad
14 Zamarin, Williams. I think the Con Ed comments
15 yesterday were appropriate. I also heard this
16 morning from someone at Washington Gas and Light
17 that, you know, costs to replace pipe in urban
18 areas, you know, can exceed \$3,000 dollars per
19 diameter inch mile.

20 I mean, it is very expensive to
21 replace pipe these days. You know, we have, when
22 the Code was written most of our transmission

1 pipe was in very rural areas. Today many of it,
2 especially the low stress pipe, is in very urban
3 areas.

4 And it just, I continue to say it just
5 doesn't make sense to me to be spending, you
6 know, the most expensive dollars on the areas
7 where they give the least public safety benefit.
8 And these are low pressure lines that we
9 demonstrated though, you know, decades of
10 research, don't have the propensity for
11 significant failure.

12 I do think Steve's presentation
13 yesterday showed that those were, even at
14 extremely high pressures that wouldn't be, low
15 stress lines have very, very small potential
16 impact radius.

17 When you look at the types of
18 pressures we're talking about, at less than 30
19 percent SYMS, they're very low pressure lines
20 that would have, you know, de minimis potential
21 impact radius.

22 So, my point is, almost irrespective

1 of the amount of mileage, it just seems like a
2 disservice to be putting resources into
3 investments that don't really contribute to
4 increased safety. So, I continue to advocate for
5 this section not being in this portion of the
6 Code.

7 And following the Congressional
8 mandate, and moving it to a filter, just as the
9 Congressional mandate did on applicability in
10 192.624 A. I think that's where it would be most
11 appropriate.

12 I think that's where the Congressional
13 mandate, you know, frankly mandated that it
14 should be. That this should apply to greater
15 than 30 percent SMYS. And that was done for a
16 very good reason. And I think when we start
17 creeping beyond that, we aren't doing a great
18 service to public safety. Thank you.

19 MEMBER DRAKE: Mark.

20 MEMBER BROWNSTEIN: So, let me take a
21 step back. Let me just ask the basic question.
22 What's the purpose of this section, the MAOP

1 section, writ large?

2 CHAIRMAN DANNER: Steve.

3 MR. NANNEY: Well, the purpose of
4 Method 5 is what you're talking about?

5 MEMBER BROWNSTEIN: No. I'm talking
6 about just 192.624. What are we trying to do
7 here?

8 MR. NANNEY: Well, it's Methods as far
9 as MAOP determinations that you can use as far as
10 determining your MAOP, or confirming that it's
11 safe to operate at that MAOP.

12 MEMBER BROWNSTEIN: Okay. And just
13 for us civilians here, MAOP, again, just to
14 remind me.

15 MR. NANNEY: Maximum allowable
16 operating pressure. So, whatever the maximum
17 pressure that the pipeline can operate. It's
18 doing inspections, pressure tests. Whether it's
19 a pressure test, an ILI, in line inspection,
20 replacing the pipe, or the other methodologies
21 that we've got here. Doing those to confirm that
22 your pipeline is safe at that operating pressure.

1 MEMBER BROWNSTEIN: Okay. And so, the
2 problem that we're trying to solve, as I
3 understand it is that we have a certain amount of
4 pipeline in the United States for which we don't
5 actually know what maximum operating pressure is.
6 And this is a set of provisions that are designed
7 to help us get those answers. Is that right?

8 MR. NANNEY: Yes. It is where records
9 are, have been lost, or have never been done, as
10 far as pressure testing the pipes, and confirming
11 the pipe wall thickness, grade, the things we
12 were talking about yesterday.

13 MEMBER BROWNSTEIN: So, it seems to me
14 that that's a very useful thing to do, right, to
15 have some understanding as to what the maximum
16 operating pressure is for pipe operating in the
17 United States. Okay.

18 And then, what we're trying to do is
19 come up with common sense methodologies to be
20 able to do that. Okay. And you're providing a
21 number of different ways to do that tailored to
22 the size of the pipe, and the expected impact

1 area if there were a failure. Correct?

2 MR. NANNEY: That's correct.

3 MEMBER BROWNSTEIN: Okay. So, it
4 seems to me that, right, in that context --
5 Because, you know, part of what I was getting a
6 little confused in is that yes, absolutely, we
7 want to make sure that we have provisions to make
8 sure that once pipe is in place, and we know what
9 the maximum operating pressure is, that we have
10 procedures in place to maintain integrity over
11 time, integrity management, SMS. That's all
12 great stuff. Okay.

13 But that speaks to me, that says to me
14 though that we still have a first order question,
15 which is what's the maximum operating pressure on
16 the pipes? Right? So, okay.

17 So, you know, I'm confused why then
18 we're getting so hung up. I mean, on these
19 particular methodologies. Because I'm not
20 hearing necessarily, I wasn't hearing necessarily
21 that the methodologies are, you know,
22 impracticable, or difficult, or too expensive.

1 What I was hearing is that in fact
2 much of this activity should just simply be put
3 into, you know, what I'll call process management
4 provisions.

5 And it sort of struck me that maybe
6 we're losing sight of what we're trying to do
7 with this set of provisions here, which is get
8 some fundamental answers that I think any common
9 sense person would expect we'd have answers to,
10 right.

11 So, I'm a little lost as to what the
12 real issue is here with these provisions.

13 CHAIRMAN DANNER: All right. Alan.

14 MR. MAYBERRY: I'm really trying to --
15 We're attempting to thread the needle. Because
16 if you look at the, take the NTSB recommendations
17 for instance. It says, eliminate the grandfather
18 clause. So, that's the full universe of what's
19 out there.

20 You have our gas transmission rule
21 that addresses the grandfather clause, which gets
22 almost the whole thing, or a good bit of it. It

1 introduces a new term, MCA that probably sums it
2 to where you're getting the riskiest stuff out
3 there.

4 And then you have the mandate that
5 specifies, address it in Class 3 and 4 and HCA.
6 So, a further subset of the full universe of
7 what's out there that has its own documented --

8 It wouldn't be that you don't know the
9 MAOP. It's just whether in some cases perhaps
10 that's the case. But in most cases it's a record
11 keeping issue.

12 So, I think --

13 CHAIRMAN DANNER: Alan, please speak
14 into the microphone.

15 MR. MAYBERRY: The challenge here, or
16 the discussion is about, you know, if you look at
17 what happened on the PG&E incident, that involved
18 a line that had a higher stress level.

19 And certainly, you know, I think we
20 all agree that lines like that, and what was, we
21 now know about that is risky, is the riskiest.
22 But when you look at the full universe of

1 transmission, it goes from 20 percent up above,
2 you know, up to 72 percent.

3 There's a varying risk in what you're
4 dealing with. Certainly, you know, and there's
5 been discussion of the leak rupture boundary
6 that, right around 30 percent and above, where
7 you go from where, you know, on the issue of the
8 pipeline would be a leak versus a rupture.

9 And that's what specified in the Code.
10 So, really a lot of the debate is, you know,
11 really applying some level of risk, a sliding
12 scale to what you're really concerned about, to
13 address the issue of record keeping in
14 establishing MAOP.

15 And so, the discussion here is well,
16 you know, below 30, or at least the point being
17 made is less, and that's what in the mandate.
18 Maybe we should be less concerned about that, and
19 really focus on the area that, you know, it's the
20 type of pipe that we dealt with in California,
21 and other, you know, types of issues, ruptures
22 we've had out there.

1 MEMBER BROWNSTEIN: So, if I can ask
2 a clarifying question, Mr. Chairman?

3 CHAIRMAN DANNER: Yes, you can.

4 MEMBER BROWNSTEIN: Is it that below
5 30 percent there's a small probability, or maybe
6 no probability of rupture? Or is it that below
7 that pressure a rupture that would occur would be
8 unlikely to be sort of catastrophic, on the order
9 of a San Bruno event? I'm just trying to
10 understand which, how we're thinking about this.

11 MR. MAYBERRY: Well, there have been
12 ruptures below 30. But you can't really
13 characterize from this. It can certainly be
14 smaller. But I can't really characterize it
15 would be less impactful. Because you just don't
16 know. But --

17 MEMBER BROWNSTEIN: So, you're saying
18 --

19 MR. MAYBERRY: It depends on the
20 number.

21 MEMBER BROWNSTEIN: So, we're saying
22 that the, that there's a low probability of

1 rupture --

2 MR. MAYBERRY: Much lower.

3 MEMBER BROWNSTEIN: -- below those
4 pressures? Is that right?

5 MR. MAYBERRY: It has happened, but
6 lower.

7 MEMBER BROWNSTEIN: Okay. But you
8 could have a situation where pipe is leaking, you
9 know --

10 MR. MAYBERRY: They tend to, there's
11 tends to be --

12 MEMBER BROWNSTEIN: Because of the --

13 MR. MAYBERRY: -- because of the
14 rupture or leak --

15 MEMBER BROWNSTEIN: -- rupture.

16 MR. MAYBERRY: -- below that point,
17 yes.

18 MEMBER BROWNSTEIN: Okay.

19 MR. MAYBERRY: Do you want to add
20 anything to that statement?

21 MR. NANNEY: Okay. Just to add
22 something, at our next meeting, on the 104

1 incidents that we have up, we will break out how
2 many were below 30 percent.

3 I probably know the answer now. But
4 I want to look at it before I just throw a number
5 out to the group, and everything. But we'll get
6 back to the group at the next meeting.

7 And it's just like Alan said, one is,
8 it's a lot smaller increment of the ruptures, the
9 leaks are that. Plus, when you look at eight
10 inch and smaller, the smaller diameter pipe, the
11 volume just is not there to create the same type
12 of problems, as if you've got a 20 inch, or 24 or
13 30 inch volume. I mean it's many times more
14 volume, even at the same pressure, with the
15 bigger diameters.

16 MR. MAYBERRY: If I might, I have one
17 other point. It hasn't been mentioned yet. But
18 maybe implied. But we, and our challenge in
19 threading the needle is applying the cost benefit
20 that we must apply in our rulemaking.

21 So, certainly if we had gone the full
22 extent of the full universe of grandfathered

1 pipelines, we just couldn't have passed cost
2 benefits.

3 So, and certainly we're hearing of
4 challenges to whether our economic analysis on,
5 you know, even what we proposed. So, we're
6 trying to find that sweet spot that --

7 Because NTSB does not have a mandate
8 to only put out recommendations that are cost
9 beneficial. Their concern is, you know, what
10 they think is right.

11 But when it comes to really, okay,
12 let's put this into policy, that's where we,
13 that's where it really becomes a challenge. And
14 it's not so easy as, well, this would be the
15 right thing to do. But we have competing
16 interests. And certainly cost is a major one
17 that we need to consider --

18 MEMBER BROWNSTEIN: Yes.

19 MR. MAYBERRY: -- you know, as we look
20 to making sure that the costs that we are putting
21 on the regulated industry is really being put to
22 the most effective use to --

1 MEMBER BROWNSTEIN: I certainly do
2 appreciate that. I would note though that the
3 next incident that does occur, right, the NTSB
4 recommendations will be sitting out there. And
5 the judge, right, the measure of effectiveness
6 will be, how far did PHMSA go in implementing
7 those recommendations?

8 And I can guarantee that the
9 representatives of those communities will want to
10 know that you did everything possible. And so,
11 we better make sure that we get this right.
12 That's all.

13 MR. MAYBERRY: Yes. And I like to
14 think that, you know, and this is incredibly
15 great conversation. I think it does point to the
16 due diligence that our staff has exercised in
17 really researching this issue, to really find
18 that right balance. So, but totally appreciate
19 that.

20 CHAIRMAN DANNER: All right. John.

21 MR. GALE: John Gale, PHMSA. I think
22 it's important to point out something regarding

1 the 30 percent SMYS issue, and the statutory
2 mandate.

3 What you have on the screen here on
4 Slide 40 and 41 are the two different provisions
5 that are contained in the statute relative to
6 this mandate. And they correspond to the
7 different applicability paragraph within 624.

8 This is not talking about the first
9 applicability, which was the in-service
10 incidents, but to one, bad records. And it's,
11 the applicability is Class 3 and 4, and all HCAs.
12 And then untested pipe, which is the third
13 applicability statement.

14 It is correct that under the third
15 applicability statement it mentions 30 percent
16 SMYS. But I want the Committee to note that
17 under the second one, on Slide 40 there, there is
18 no mention of below 30 percent SMYS, or above 30
19 percent SMYS.

20 So, if we were to adopt a requirement
21 that accepted below 30 percent SMYS that would
22 not be in accordance with that mandate.

1 CHAIRMAN DANNER: All right. Andy.

2 MEMBER DRAKE: That's a great point
3 actually. Getting ready to make that. To
4 Sarah's point earlier, I think when we look at
5 this, to make the determination about 30 percent
6 is about records, which is about, what that
7 section's about.

8 You have to have records to even
9 determine where you are on this scale, which
10 kicks you back to 607, which is one of the
11 questions you're asking. So, that's important.

12 I think 30 percent, this is a great
13 conversation. It really is. And I agree with
14 Mark. We need to get this right. Why are we
15 doing whatever we're doing? Better have good
16 logic that holds up.

17 I think Steve's right. There's a good
18 report from Kiefner & Associates that
19 particularly vetted out what family of events
20 have happened below 30 percent. The vast
21 majority of that was outside force. You know,
22 you have other things loading on the pipe that

1 caused them to rupture. I think we'll find that
2 when we get to that.

3 I think the other, there's very few
4 when you start to differentiate down to that.
5 But I think there's a handful that were
6 corrosion. And they were very extensive
7 corrosion. That should have been caught with
8 ECDA or other protocols, which is why I think
9 they're advocating for these low stress pipes to
10 do those technologies.

11 And I'm just advocating for those
12 technologies. Put them in IM, because that's
13 where they belong. And that's sustainable beyond
14 just doing integrity, or beyond doing your MAOP
15 confirmations.

16 I think the thing that I heard, that
17 caught my ear, and I can appreciate it. This is
18 hugely complex with say, or intricate may be a
19 better word. And how these mechanics work is
20 important for us to understand.

21 But what we're talking about is all
22 pipes and HCAs, Class 3, Class 4, and MCAs, which

1 we haven't even gotten to MCAs yet, are subject
2 to this filter, in the discussion that we're
3 having on this table. And that doesn't mean
4 that's exclusive. That's just the most logical
5 place to start.

6 When we did integrity management so
7 many years ago we started HCAs. It was never
8 written that that would be the end. It was just
9 a start. And we're sort of at the second charge
10 here. So, now we're going to have HCAs, Class 3,
11 4, and MCAs in this discussion.

12 And when, I appreciate that we're not
13 getting rid of the grandfather clause completely.
14 I don't know how to actually do that. I think
15 that was a discussion we had a year ago.

16 What we are doing, and we're trying to
17 be very deliberate about it is, eliminate the
18 clauses that create the risk, which is about
19 untested pipes, and pipes without documentation.

20 And so, I hear what you're saying.
21 Yes, you're right. We're not eliminating it.
22 But we are eliminating the clauses that create

1 the risk, which is appropriate.

2 And we want to be very deliberate.
3 Are we being effective in that, which is this
4 conversation we're having right here, which is a
5 great conversation. And I think we should create
6 a lot of transparency on this, because this has
7 to be sustainable and practical, which is your
8 sweet spot.

9 CHAIRMAN DANNER: All right. Chad.

10 MEMBER ZAMARIN: Chad Zamarin,
11 Williams. One thing I want to go back to is,
12 when we talk about cost benefit I do think that
13 this will be an area that if we don't get it
14 right is going to be heavily challenged.

15 I think that the, you asked about
16 practical. I think the message is that the
17 requirements that are being proposed for less
18 than 30 percent SMYS are not practical. And that
19 it would drive operators to pipe replacement,
20 that is --

21 And the problem with that is we're
22 talking about the least amount of risk with the

1 heaviest amount of cost. I mean, this is where
2 there is de minimis risk.

3 You know, I was in the meetings that
4 led to why the legislation was written the way it
5 was. And it was to ensure that we were putting
6 the resources towards preventing the next
7 catastrophic accident. And it was recognized
8 that that would be done by focusing on pipeline
9 greater than 30 percent SMYS.

10 And the sad challenge is that if we
11 open it up to everything we actually shift the
12 heaviest cost burden to the least safety benefit.
13 And that's just not I think a good way to craft
14 this regulation. I think we need to stick with
15 the intent of the mandate.

16 And I understand NTSB's, you know,
17 recommendations. But I also think NTSB wants us
18 to focus on investing the resources that we have
19 in the areas that will have the greatest impact
20 on reducing risk.

21 And so, I continue to promote us
22 thinking hard about, you know, creeping beyond

1 the Congressional mandate. Because I just don't
2 think the benefit is there.

3 CHAIRMAN DANNER: So, maybe -- All
4 right. So, I'm sorry. Cheryl.

5 MEMBER CAMPBELL: Yes. I want to ask,
6 Steve, when you bring that split back I would ask
7 that we bring the split on the root cause as
8 well, so that we can, you know, we can see what
9 the cause was.

10 My recollection of the report was, as
11 Andy's, is that they were not manufacturing or
12 construction issues. They were more, you know,
13 the outside force or corrosion, things of that
14 nature.

15 If needed, I think maybe we provide
16 some clarity, right, in the integrity management
17 section about, you know, dealing with some of
18 those types of issues, right, in these lower
19 stress pipelines.

20 I do think that a rupture in these
21 pipelines is very, very rare, of the type that
22 we're talking about. So, I mean, I would just

1 add my voice to the choir about that.

2 And then, I wanted to make sure I
3 understood. Because, I mean, I think what we're
4 talking about here is, operators believe that
5 they know what the MAOP is on their pipes, or
6 they would not be operating them at that
7 pressure, right?

8 And for those where we might have some
9 gaps in records, or were grandfathered -- I don't
10 know if I like that term or not. But, I mean, it
11 is the term we all use. I believe what we're
12 talking about here is reconfirming that MAOP. Is
13 that correct?

14 MR. NANNEY: It's confirming or
15 reconfirming.

16 MEMBER CAMPBELL: Confirming or
17 reconfirming.

18 MR. NANNEY: And let me say, I have
19 seen operators, at least one operator that had,
20 that did not know what their MAOPs, of an entire
21 system.

22 MEMBER CAMPBELL: I'm sure that's

1 true. I'm sure you have, Steve. That's why
2 we're here. That's exactly right. So, yes. I
3 just wanted to be clear about that. Because to
4 me that's what we're talking about here is, if
5 you've got these pipelines, right, we're talking
6 about reconfirming where you're at.

7 And either finding ways, right, to
8 fill those record gaps, or finding a way to
9 reconfirm the speed limit, if you will, right,
10 that we're going to go at on these pipelines.
11 So, that's all I've got, Mr. Chair.

12 CHAIRMAN DANNER: Thank you. Sarah,
13 and then Mark.

14 MEMBER GOSMAN: So, one thing I want
15 to bring up, I'm glad that John brought up the
16 different statutory mandates. Because I think
17 that's important in understanding this 30 percent
18 SMYS issue.

19 And then, the other thing that I want
20 to talk about is the fact that we have a catch
21 all alternative methods provision here. So, I
22 think it might be really helpful to work out what

1 that particular low SMYS methodology might be.

2 But we also have a rule that is
3 designed so that if that's too onerous, or it
4 doesn't match the particular set of issues that
5 operator has, they can go to PHMSA and put in the
6 alternative.

7 And I think that's a really critical
8 part of this rule. And it's really critical as
9 it gets to cost. Because with that kind of
10 provision you avoid the situation in which there
11 are high costs across the board. Because they're
12 not specific to the particular operator.

13 CHAIRMAN DANNER: All right. Mark.

14 MEMBER BROWNSTEIN: So, just an
15 observation, and then a question. You know, I
16 take Cheryl's point. But by the same token, just
17 because a company is doing something doesn't mean
18 that they know, okay.

19 I used to do environmental compliance
20 for a utility. And so, whenever the operating
21 guys came back to me and said that they believed
22 something, right, my radar always, you know, my

1 light always went off, right.

2 A lot of tribal folklore in the
3 business. And I think what this provision is
4 designed to do is sort of get away from tribal
5 folklore, and get some real data on the table,
6 which serves everyone's interest. So, and I
7 don't get the sense that anyone's disagreeing
8 with that.

9 I want to unpack this because, you
10 know, we heard from the public comment yesterday
11 that as a consequence of some of these, this
12 provision, you know, some companies would be sort
13 of forced to just simply replace pipe. And that
14 would be very costly, particularly in populated
15 areas where it's difficult to excavate and do
16 that work.

17 I'm just trying to understand what the
18 relationship is between doing this kind of
19 testing on the one hand, and the concern that if
20 they were required to do this they simply
21 wouldn't replace pipe.

22 I don't quite, I just don't understand

1 that. And maybe I'm misunderstanding the nature
2 of the comment that we heard. But I'd like to
3 better understand that.

4 CHAIRMAN DANNER: Are you --

5 MEMBER BROWNSTEIN: Yes. So --

6 CHAIRMAN DANNER: Is that directed at

7 --

8 MEMBER BROWNSTEIN: There seems to be,
9 I mean, we could ask the person from Con Ed. But
10 it seems to be that you all understand what she
11 was talking about. So, I just want to better
12 understand from, what that's all about.

13 CHAIRMAN DANNER: All right. Cheryl.

14 MEMBER CAMPBELL: Yes. I'm happy to
15 provide a little information about that.

16 Frankly, we have replaced some pipe, right, as
17 opposed to trying to do the testing that PHMSA
18 has in the proposed regulations.

19 And what you end up with is, it
20 depends, frankly, it depends on each unique
21 situation. So, some of them might be a single
22 line feed into a remote area.

1 So, you can't just take a line out for
2 a couple of weeks to do MAOP hydrostatic testing.
3 Because you have no way to maintain service to
4 those customers. And, you know, I have a lot of
5 mountain communities. You can't just shut a
6 mountain community off for two weeks, right.

7 And if you find something on the
8 pipeline while you do that testing, let's say you
9 blow it out and you've got to do some repair
10 work. You're down for even longer. So,
11 sometimes you can maintain service, sometimes you
12 cannot. So, it just depends on the situation.

13 Other times, by the time you cut in
14 valves, and prepare the line for testing, because
15 you have to cut out a lot of obstructions and
16 stuff, so you can dry it appropriately, et
17 cetera, you've spent more money than it would
18 have cost you to replace it.

19 So, it's, you know, you try to do the
20 cost benefit on each individual segment, and
21 determine if you think you can test it. Or, and
22 sometimes it depends on its vintage, right, and

1 how old it is, and what kinds of construction
2 issues you think you might have in those areas.
3 Sometimes it's just more cost effective for our
4 customers to replace those lines, rather than try
5 to do a test on them.

6 CHAIRMAN DANNER: All right. Chad.

7 MEMBER ZAMARIN: Thanks. Chad
8 Zamarin, Williams. I also want to point out,
9 because I don't want it to be heard that this is
10 a do nothing approach.

11 When we were working on this we
12 committed on the interstate side of the industry
13 to addressing all pipe, even outside of HCAs, by
14 2030. One of the reasons, and the majority of
15 that, 90 percent by 2020.

16 One of the reasons why we in the
17 interstate side said that is because in
18 particular for low stress pipelines, low flow
19 pipelines, it's very hard to use advanced
20 technologies to do alternative assessments.

21 You can't put an in line inspection
22 tool in most of these lines. Most of them are

1 not piggable, or they don't have enough flow to
2 move a tool through the line.

3 So, what you end up with is, remember,
4 this is the very lowest risk pipe in the
5 inventory. And we're talking about reducing the
6 pressure of the pipe.

7 We're talking about requiring an
8 external direct assessment, which is a series of
9 surveys and analyses that must be done above the
10 ground and around the pipe.

11 We're talking about doing an internal
12 corrosion direct assessment, which is an analysis
13 of the pipe in many different fashions, to
14 determine whether or not it could have the
15 potential for internal corrosion.

16 We're talking about developing and
17 implementing procedures for non-destructive
18 testing, for examinations and assessments for
19 cracks and crack like defects.

20 We're talking about monthly patrols at
21 intervals not to exceed 45 days, weekly patrols
22 in Class 3 areas. We're talking about instrument

1 and leak surveys. These are ands. You have to
2 do all of these things.

3 And I'm just telling you as an
4 operator, you're going to look at that, and
5 you're going to say, that is incredibly difficult
6 to do on these lower stress lines.

7 And so, when we were working as a
8 community on what makes sense for the legislation
9 we always said, look, we get it. We want to get
10 everything covered. But we've got to start with
11 the things that make the most impact.

12 And we've also got to recognize that
13 as you start dealing with smaller diameter, lower
14 stress, and unpiggable pipelines, that we
15 continue to work on technology that will make it
16 more feasible to do that at a cost effective
17 manner. And so, that was, I just want to make
18 clear that was the goal at the time that we did
19 this.

20 And so, but I think, when I read this
21 I was pretty shocked. If you look at the other
22 sections, we kind of loaded the most onerous

1 requirements on the least risky segments, that
2 are the most difficult to assess. So, I just
3 think we need to rethink that.

4 CHAIRMAN DANNER: All right. Andy,
5 and then Steve.

6 MEMBER DRAKE: This is Andy Drake with
7 Enbridge. I think that's a very good point. The
8 thing that strikes me, and we talked about this
9 yesterday, was what we call DIM, Distribution
10 Integrity Management.

11 There are, I brought that up on
12 purpose, because I think it actually interlocks
13 with this conversation pretty intensively. That
14 we deliberated over this when we did gas
15 transmission integrity management, and
16 distribution integrity management.

17 Because this leak rupture threshold,
18 which isn't a sharp line, it's a grey area where
19 you decidedly start to get away from the capacity
20 kind of rupture, is a big deal. It's, what
21 threats, how do threats manifest themselves?

22 It's different as you move across that

1 regime. So, construction and manufacturing
2 threats become much less of an issue. Outside
3 force, third party damage, other things become
4 more relevant.

5 And how do you confine them is also
6 different. Most of these low pressure pipes
7 don't have enough driving force to move a pig.
8 So, that's good, the fact, that's good to know.

9 And the fact that they're predisposed
10 to leak, rather than fail, gives us a different
11 tool to use. We ramp up one of our leak
12 detections that we would run.

13 I think the thing that's relevant
14 here, that I learned as we were going through the
15 distribution integrity management rules some
16 years ago was, the histogram of distribution of
17 mileage. If we look at where these pipes are,
18 these are pipes in residential areas. They're
19 down in, you know, urban areas.

20 They are not prone to failure. But
21 there's lots of them, lots and lots of them. So,
22 if we don't get this right, we can suck a lot of

1 pipes into this requirement, where there's not a
2 lot of value. And I think that's what we were
3 hearing yesterday.

4 You know, there's thousands and
5 thousands of miles that large diameter pipes.
6 There's hundreds of thousands of miles of small
7 diameter pipe. So, understanding the threats
8 that they create is important. And not just
9 trying to throw everybody in the same bucket.
10 The threats don't manifest themselves, and the
11 tools don't work the same.

12 So, understanding that differentiation
13 is a big deal, especially as you start to
14 encumber the small diameter pipes, because of the
15 number that's involved in it.

16 And I think that's kind of what I'm
17 hearing from the audience is, if we're not
18 careful, and they draw this line into the small
19 diameter pipes, that we just drew a lot of pipe,
20 and a lot of energy into this discussion, where
21 there's not a threat. And I think that's really
22 why this conversation is so important, to make

1 sure we understand how that manifests itself.

2 CHAIRMAN DANNER: All right. Steve.

3 MEMBER ALLEN: Steve Allen. And yes,
4 I think Chad verbalized what I was trying to say
5 earlier about, as a state regulator it would be
6 easier to enforce an or, rather than an and.

7 It does get back to kind of resources,
8 I think, for the, say the small privately owned
9 LDCs. You know, there could be a pretty
10 significant amount of effort that goes into
11 complying with this rule. And perhaps not enough
12 customers to spread those costs over.

13 And likewise, with the municipal
14 operators. While most of those are not under
15 state jurisdiction for establishing rates, they
16 have the same problem. They have to go their
17 Town Councils and try to come up with, you know,
18 the tax to go ahead and, or the rates to go ahead
19 and pay for that. And there's going to be a lot
20 of pushback.

21 And as such, you know, it's going to
22 be difficult to enforce for, you know, some of

1 the state regulators, state pipeline safety
2 regulators. And I just wanted to thank Chad for
3 saying what I wanted to say in the first place.

4 CHAIRMAN DANNER: All right. Thank
5 you. Ron.

6 MEMBER BRADLEY: Ron Bradley, PECO.
7 So, just weighing into the conversation as well.
8 I think is a really interesting and a good
9 conversation about this subject, specifically the
10 smaller SMYS kind of pipe, the pipe closer to 30
11 percent and lower.

12 The question that came up, I think you
13 heard the public comment about Con Ed were, or
14 companies that may have to replace a lot of pipe.
15 It's good that there are alternatives. That's
16 the first thing, and I would like to say that.

17 It's good to see some opportunities
18 for just sort of picking something that will work
19 to help us confirm MAOP where we didn't have good
20 records.

21 And I do understand that there's got
22 to be a company out there, or two, that really,

1 really don't know what the MAOP. But I know, I
2 believe most of us have a knowledge of it. And
3 when some of this pipe when in place, you know,
4 just over the years just didn't do a good job of
5 maintaining records.

6 Today we're in a place where a lot of
7 our records are automated, go into databases.
8 We're at a whole different place today in this
9 kind of technology era.

10 But in a world where we had to move
11 records from building to building, place to
12 place, I think some of those records got lost.
13 That's obviously what I believe happened.

14 Now, in the case of why would I have
15 to, if put against these parameters, replace a
16 section of pipe? It could be that it is feeding
17 specifically to a large customer. And either I
18 have to work sometime to take that customer off
19 line. Or maybe I can find a way to leverage my
20 right of way, and put pipe in. It could be that.

21 I think these are all case by case.
22 And I do not believe the first thing that we

1 would do, or many companies would do would just
2 be invest the capital into installing the new
3 infrastructure.

4 I think you'd want to figure out what
5 you have in your infrastructure with some of
6 these other alternatives. But there are cases
7 where I could see where the best alternative
8 would be just to put in pipe, and replace it.

9 CHAIRMAN DANNER: All right. John,
10 and then Sarah.

11 MR. GALE: Thank you, Mr. Chairman.
12 John Gale again, PHMSA. Another nuance to point
13 out on the applicability of these provisions.
14 And that's the issue of the MCAs. Not that I'm
15 looking to get into the definition of MCAs. That
16 will be at a later time.

17 But if you notice that the
18 applicability of MCAs only comes into place in
19 two areas. And it does not come into play under
20 the area of bad records. And that's to be
21 consistent with the mandate.

22 So, it's a little bit of this nuance,

1 part of this rule. But we did bring in the
2 concept of the MCAs. But we only apply it to the
3 "grandfather pipe".

4 And we only apply it to the area of
5 history of failures attributable to defects and
6 incidents. So, in the area of lack of pressure
7 test records, it's only HCAs, Class 3s and 4s,
8 which is consistent with the mandate.

9 Now, you still have the ability to
10 come up with a method that's less onerous than
11 things like pressure test, et cetera. But to be,
12 to cover the mandate we would be obligated to
13 come up with a method to address those pipes.

14 MEMBER GOSMAN: So, I'd like to know,
15 do we have stats on the mileage and number of
16 operators that are going to be affected by this
17 set of pipelines that we're talking about right
18 now?

19 MR. GALE: If I, on the slide to your
20 left, Sarah, there at the bottom you see we
21 estimate that approximately 8,089 miles of gas
22 transmission pipe would be subject to 624. The

1 breakout, if I recall, if roughly 3,000 miles or
2 so of grandfather pipe.

3 MEMBER GOSMAN: And then, about how
4 many is 20 to 30 percent SMYS?

5 MR. GALE: I think our preliminary
6 estimation is less than 1,000. Might be close to
7 500 miles right now. We're still working on that
8 number. But I think that's --

9 MEMBER GOSMAN: Okay. So, I think
10 that's a really important number here. Again,
11 thinking about cost. And do you have a sense of
12 how many operators are going to be impacted?

13 And I don't want to minimize the
14 impact on specific operators, right. But when we
15 think about cost benefit analysis, and
16 particularly what we're trying to do is, you
17 know, sort of look broadly at costs, and compare
18 them broadly against benefits.

19 MR. GALE: Yes. I don't have that
20 number right now, Sarah. We'll see if we can
21 work on that.

22 MEMBER GOSMAN: Okay. And then, I

1 think I'd be, I'm interested. I see a lot, like
2 just in terms of numbers, right, and a lot of
3 requirements on this particular number 5 Method.

4 But I'm not sure where the cost, the
5 concern about cost is coming from. If there's a
6 particular, and is it the patrols, right? Is it
7 the fact, I mean, when I read this, I, you know,
8 there's -- Yes. So, I'll leave it there.

9 I'd love to hear more about, you know,
10 if you could identify the particular areas that
11 are of concern. So, maybe we could focus on
12 those, rather than a sort of general discussion
13 of cost.

14 CHAIRMAN DANNER: All right. Ron, and
15 then Chad. Ron.

16 MEMBER BRADLEY: My comment, Ron
17 Bradley from PECO. My comment was specifically
18 about, you know, some companies may have the
19 decision to replace, right.

20 So, in all cases with transmission
21 there are Code requirements around preventative
22 maintenance we have to do. And I think that

1 happens regardless of whether it's new or an
2 existing pipe that we reconfirm or confirm the
3 MAOP for.

4 So, I don't see a big issue with cost.
5 We're going to have to do leak survey at a
6 routine cycle. We're going to have to do circuit
7 patrols, or line patrols at a routine cycle.

8 We're going to have to apply cathodic
9 protection effectively at a routine cycle, and do
10 all the checks on reactive fires and test
11 stations. All of that stays. I don't see that
12 changing.

13 I just think that there are times
14 where if it's unpiggable we're going to have to
15 do some work. We're going to have do some
16 capital work. We're going to have to install
17 launchers. We're going to have to -- I don't
18 think those are issues. I think you build those
19 into your work plan.

20 And you make your, you build a
21 transition plan. And you move yourself to a
22 place where you do have piggable lines, and you

1 do have the right kind of technology to do
2 disruptive or non-disruptive tests to collect the
3 information you need. I don't think I have an
4 issue with that.

5 MEMBER ZAMARIN: Chad Zamarin,
6 Williams. Having worked at a company that had
7 quite a bit, I'm not there now, but had quite a
8 bit of low stress pipe, I will tell you that much
9 of it is in areas where it's very difficult to
10 excavate. It's under concrete roads or
11 sidewalks.

12 So, the idea of performing external
13 corrosion direct assessment, internal corrosion
14 direct assessment, digging up the pipe to do non-
15 destructive testing, or destructive testing, you
16 know, is very challenging.

17 And frankly, I think those are the two
18 methods that are the, that we're kind of relying
19 on the most for, you know, this segment. And,
20 you know, the mileage may seem like it's not a
21 big number.

22 But if you just extrapolate some of

1 what heard, you know, 500 of pipe, we can be
2 talking about \$5 billion dollars of investment.
3 Do we want to invest \$5 billion dollars to solve
4 a problem that really doesn't exist? I mean, I
5 think putting that \$5 billion dollars towards the
6 areas that are greater risk is a lot more
7 important.

8 And you just start, and the problem
9 with, you know, these areas is, the more of these
10 things we tack on, you start loading, you know,
11 investment into areas that aren't really
12 attacking the greatest risks. So, it's real
13 money. And it's, and I think we want to make
14 sure the money is getting the most benefit.

15 I would also is, and this isn't maybe
16 proscriptive. But the Code serves as kind of a
17 beacon for how we operate outside of just the
18 proscriptive regulatory areas, the applicable
19 areas.

20 So, typically when we write, you know,
21 when things like this become Code, they become a
22 standard that is referenced for how we manage

1 things outside of HCAs, outside of, you know,
2 Class 3 and 4 areas.

3 And so, you know, we look to the Code
4 for being a, you know, smart approach to
5 balancing the risk, and the issues on a pipeline
6 with the requirements of what you should do.

7 And I just again worry that we're kind
8 of shifting practices to an area of very low risk
9 that are high cost. And I think we're, you know,
10 we're causing some concern.

11 I do want to address one thing. And
12 we heard some talk about not having MAOPs known
13 on pipelines. That would be a compliance
14 violation with existing regulations.

15 We have to have MAOP established on
16 every pipeline by current Code, either through a
17 documented grandfathering of the pipe, we've
18 heard about that process in the late '60s, or
19 through traceable, verifiable, and complete
20 records for pressure tests that have been
21 performed in accordance with Subpart J.

22 So, we're not, I mean, there may be

1 operators out there that we've seen that don't
2 know their MAOPs. They would be in violation of
3 current regulatory Code.

4 So, this is about, the intent of this
5 requirement was for those pipelines that have
6 their pressures established, their MAOPs
7 established or grandfathering through that late
8 '60s process, which I'll tell you is a, you have
9 to have a documented process that, and we have
10 records that date back to the '60s that show the
11 pressure, you know, charting and documentation
12 that was done to establish those MAOPs. We're
13 talking about reconfirming MAOPs on those
14 pipelines.

15 So, I know we're worried about, you
16 know, some of the circumstances that we've talked
17 about. But the Code requires a known and
18 documented MAOP for every pipeline today. I
19 think we're totally comfortable with every
20 pipeline has to have records that reliable and
21 verified.

22 And I will tell you, you know, we've

1 been working since San Bruno to go out and verify
2 all of our records on both, you know,
3 grandfathered and pressure tested pipe. But I
4 just wanted to make that point. Thank you.

5 CHAIRMAN DANNER: All right. So,
6 Rich.

7 MEMBER WORSINGER: Rich Worsinger,
8 Rocky Mount Public Utilities. I think we're
9 missing something. And it really was brought up
10 yesterday, comments of the public.

11 That we're taking the smallest
12 diameter pipelines here, the ones with the least
13 risk, and we're requiring additional, we're
14 requiring more actions on that than we are on the
15 larger diameter, those operating over 30 percent
16 SMYS.

17 And my suggestion here is, instead of
18 making it an and, make it an or. It's either the
19 ten percent pressure reduction, or those other
20 methods. Not the and. I mean, I just, I'm kind
21 of confused. I know, Steve, this is something
22 you guys are going to go back and look at.

1 But why requiring more actions on, as
2 you pointed out, the potential impact risk of
3 these, because they are smaller diameter, the
4 volume of gas if they were to rupture is much
5 less. So, I'm just, I think that's something we
6 have to go look at.

7 CHAIRMAN DANNER: All right. Andy.

8 MEMBER DRAKE: Andy Drake with
9 Enbridge. I want to try to provide some clarity
10 about my comment earlier about mileage. I think
11 that's relevant here.

12 I do think that you're asking how many
13 miles are exposed to this. And the comment
14 earlier about the disproportionate amount of
15 small diameter miles is mostly a concern about
16 what miles are exposed to these filters that
17 we're talking about?

18 It's not that 100,000 miles would come
19 into the rule. It's just that there's a big pool
20 of pipes there. So, as we move the criteria
21 around, more, there's a flash volatility to that
22 big volume, big pool that could come into this

1 rule.

2 I don't know the basis for the numbers
3 that PHMSA's showing up there. I've seen some
4 different numbers. I'd like to see that. I
5 think that's fair for you, as well. It sounds
6 like we share that interest in understanding the
7 breakdown.

8 But you asked, you know, what was
9 driving some of that? And I'm kind of projecting
10 a little bit from some of the comments from the
11 audience, based on that understanding of how big
12 that pool is. That if the filter moves around
13 it's, you're, a lot of things can end up in
14 there.

15 But I do think it does come back, as
16 Chad said, it comes back to risk. What is it
17 that we're trying to manage here? And an
18 understanding, what is the threat that those
19 pipes create? And how do we manage that threat,
20 which drives back to DIM.

21 They still need to define their MAOP.
22 They still need to have records, which is a new

1 obligation for them. If they define that they're
2 below 30 percent SMYS we know that there are
3 certain threats that start to wane. Okay.
4 That's what this is trying to deal with.

5 And they still have to go through
6 integrity management, DIM, even as we adjust it
7 here. So, I think it's really important that we
8 keep that clarity as we walk through this
9 discussion, or we end up putting I think
10 unintended consequences. We put a lot of energy
11 into places that's not doing anything.

12 It sounds good. But I think they're
13 still obligated to know their MAOP. They're
14 still obligated to have data to make that
15 prediction. They're still obligated to manage
16 the asset, which is what we're trying to get them
17 to do.

18 And the big pipes, which is where the
19 rupture threat is, aren't in that class. That's
20 primarily where the concern is. So, I think it's
21 worthwhile to get some more of the numbers to get
22 clarity about that. But I still think it comes

1 back to understanding how these things link
2 together to solve a problem.

3 CHAIRMAN DANNER: All right. So, at
4 this point I think that everybody, I think a
5 number of views have been expressed. I think
6 we've had a very good conversation. And I don't
7 know that, I don't see this conversation driving
8 towards a particular consensus.

9 And I'm wondering, Alan, I should ask
10 your advice on this. Should we table this
11 discussion right now, and move on? Or do you
12 want to keep going for another hour?

13 MR. MAYBERRY: Well, I don't have a
14 flight to catch, so I'm good. No. I would
15 suggest we table it. We were just site boring
16 here a second ago. And, yes, I've mentioned
17 maybe if we could get a proposal.

18 I would table it now. And then, if
19 between now and the next meeting if some
20 suggestion of an alternative approach, if you
21 guys could consider that, we'd look to bring it
22 back, post it to the docket. And we'll consider

1 that.

2 I mean, we've heard a lot of comments
3 here. We'll consider it as well. But I would
4 just suggest that if we could get an alternative
5 suggestion to, you know, bring it back.

6 MR. MAYBERRY: Well, just --

7 CHAIRMAN DANNER: Okay. Andy, and
8 then Mark.

9 MEMBER DRAKE: Andy Drake. I think
10 one thought I'd throw out there as we button this
11 up, and just a thought that kind of struck me as
12 we're looking at this.

13 With all the energy you're putting
14 into 624, is it appropriate to consider leaving,
15 you know, making more changes to 619? I think
16 624 actually deals with this issue.

17 And I think you may be in a place
18 where you can leave 619 alone, because you're
19 dealing with the problem here. And I just throw
20 that thought out, because I think that,
21 recognizing the obvious, how much energy you're
22 putting into 624.

1 CHAIRMAN DANNER: Mark.

2 MEMBER BROWNSTEIN: Well, I just
3 wanted to observe, I mean, there were some
4 factual issues, there's some facts that we wanted
5 to get out on the table.

6 I don't, people can propose whatever
7 they want. But for me, you know, there's some
8 threshold issues that we want to better
9 understand. And then, it makes it easier to
10 evaluate this, or any proposal anyone puts
11 forward.

12 So, I don't think it's a matter of
13 just simply coming up with, you know, alternative
14 proposed language. It's, there's some, right,
15 there's some questions that have been asked. And
16 those answers are important to then understanding
17 how to best proceed. That's all.

18 CHAIRMAN DANNER: Okay. But I think
19 that those questions are on the record, unless
20 you think there's, there are factual questions
21 that have not been asked. Okay. Alan.

22 MR. MAYBERRY: Well, I was just, we'll

1 bring, yes, I mean, we'll bring back, I think we
2 have some data to bring back on the leak rupture
3 boundaries. So, we'll bring that. I think that
4 will help inform.

5 But, you know, that's a data point.
6 But in addition to that, if there's a suggestion,
7 you know, we're all ears in the meantime. But
8 we'll consider it at the group, next meeting.

9 CHAIRMAN DANNER: All right. Steve,
10 last word.

11 MR. NANNEY: This is Steve, okay.
12 There's --

13 CHAIRMAN DANNER: Yes.

14 MR. NANNEY: Just one thing. And to
15 help clarify. Is if you go and you look at
16 Method 5, and I, and then, and there's been a lot
17 of conversation about putting it into integrity
18 management or not.

19 And the reason, when we were looking
20 at this originally, we didn't put it in integrity
21 management is, we weren't trying to expand
22 integrity management.

1 Because if we put it in there, number
2 one, there would have been a lot of Class 3 and
3 4, and even HCAs that were originally not in HCA,
4 that would have been put in there.

5 And if you go look at the methods that
6 we're talking about, if you look at the external
7 corrosion direct assessment, that is integrity
8 management. When you can't run an in line
9 inspection, you can't pressure test. All these
10 things that we are talking about, that cost a lot
11 of extra money, this is alternative measures when
12 you can't do all of that.

13 And then, like the internal corrosion
14 direct assessment is when you do have wet gas,
15 and you have situations to where you're going to
16 have internal corrosion.

17 And at the end of the lines, hopefully
18 these are lines that have dry gas. And it's
19 going to the, very close to going to the
20 customer. And hopefully that's going to be very
21 minimal. So, really what this is, is
22 those type, direct assessment, indirect

1 assessment methodologies that's already in
2 integrity management.

3 And then, as far as if you look at the
4 wording in there for cracking, and those type
5 things, is if you have reason to believe you've
6 got those issues, you do something about it. And
7 that's exactly for those threats, what you would
8 do under integrity management.

9 And then, the one that I'm hearing,
10 and I think PHMSA, prior meetings have said, we
11 would be opening to listening. And everything
12 would be on patrols, and those types.

13 It's like I think what Mark said
14 earlier, is that the number of those or some
15 things like that. And then, the thing there,
16 when we originally wrote it is, we said, well,
17 this is in Class 3 and 4.

18 There's going to be a lot of one
19 calls. You're going to be out there anyway,
20 probably every day. Is, what can we do to make
21 sure it's being checked?

22 Now, whether it should be weekly, or

1 monthly, or quarterly, you know, that's something
2 I think, you know, we would definitely want to
3 hear, see input.

4 And why, and then, if you go back and
5 look, if you do the ECDA methodology, one of
6 Sarah's concerns has been on material
7 documentation. But when you go do ECDA you'll
8 have to do what has been her concern on verifying
9 your material. So, it all wraps in. What we've
10 put in there had wrapped in.

11 And like Alan said, and we've all,
12 we're open to listening to different ideas, and
13 trying to get the best result. But I just wanted
14 to give everybody an idea of how we came up with
15 that. And again, we're all open to listening,
16 getting better ideas down. So --

17 CHAIRMAN DANNER: All right.

18 MR. NANNEY: And anyway, before we
19 took a break I just wanted to get that out.

20 CHAIRMAN DANNER: Yes. Thank you. I
21 don't know that we're near break yet. The, but
22 there were a number of factual questions that

1 were put forward. And I hope that you'll be able
2 to get some information, and share it with the
3 Committee members before we gather again.

4 Okay. So, the next item is fracture
5 mechanics. Are we ready to move on? You want a
6 break?

7 CHAIRMAN DANNER: Let's take a vote.
8 Who wants a break right now?

9 (Laughter)

10 CHAIRMAN DANNER: All right. All
11 right, everybody. Ten minutes, come back.

12 (Whereupon, the above-entitled matter
13 went off the record at 9:45 a.m. and resumed at
14 9:59 a.m.)

15 CHAIRMAN DANNER: Okay, are we back on
16 the record. All right, Sara.

17 MEMBER GOSMAN: So I really think this
18 was a great discussion. I just don't want to
19 lose track of the issues around material
20 documentation and process, and the provisions as
21 we go through each of these methods how that's
22 going to apply.

1 So I think that we're going to come
2 back after we've had some more data and talk
3 about these sets of issues. But I just want to
4 make sure, I'm sorry to sound like a broken
5 record here, but just make sure that we continue
6 to have that discussion, because it's, yes, it's
7 a critical discussion for me.

8 CHAIRMAN DANNER: Okay. Excellent
9 point, thank you. Chad.

10 MEMBER ZAMARIN: Chad Zamarin,
11 Williams. I just wonder if maybe before the next
12 meeting we could have a, I know we talked about a
13 flow chart and I think that's difficult to do for
14 the whole code, but maybe if we can map how 624
15 and the various sections tie to 607 and make sure
16 that we're comfortable that we've got it wired
17 the right way. I think that would be helpful for
18 the next meeting. Thank you.

19 CHAIRMAN DANNER: All right. Thank
20 you. And, Andy.

21 MEMBER DRAKE: I'd like to second
22 Sara's comment. I really think that this, it is

1 very intricate what we're going through and
2 helping could be very clear, flow charts would be
3 good, but helping to be clear what kind of
4 information we need that cues us back to 607
5 here, from MAOP.

6 I mean, we were talking about it.
7 It's just deliberate in here. So I think that
8 would be, I think that's important for that
9 clarity.

10 CHAIRMAN DANNER: All right. Thank
11 you. Any other comments? All right. So we're
12 moving on now to fracture mechanics, Item Number
13 3. And I would like to turn to the folks behind
14 me, see if there's any public comments regarding
15 fracture mechanics.

16 MS. KURILLA: Hi, Erin Kurilla, APGA.
17 Actually, I'm not making comment on fracture
18 mechanics, but just want to make a quick comment
19 to get it on the record because it's not listed
20 as one of the public comment sections up there.
21 It pertains to 619(e) that was included in the
22 slide deck. And John brought it up on the side.

1 We, the industry, appreciate some
2 simplification of 619(e). However, I kind of
3 have a multi-folded comment here where I actually
4 agree with Andy's earlier comment, that I don't
5 actually think it's necessary to include 619(e)
6 in the code. Really all it does is point
7 operators to requirement in 624. I think if you
8 are applicable to 624, you have to do 624. You
9 don't really need a code section to point you
10 there.

11 Furthermore, I think that the word
12 notwithstanding is actually incorrect. And I'm
13 smiling because people who know me best know that
14 I get really obsessed with this word.
15 Notwithstanding means, in spite of. So I read it
16 and I'm not a lawyer, but I pretend to be one
17 sometimes, that it actually says in spite of all
18 the requirements in A through D you should do
19 624.

20 So I think that's the wrong word. And
21 I will offer written comments after the meeting,
22 but I believe the best way to actually resolve

1 all of this is in 619(a), to actually simply
2 state that you are to set your MAOP via one of
3 the 619 methods or via 624. So, just want to get
4 that on the record and will file written comments
5 to that effect. Thank you.

6 CHAIRMAN DANNER: All right. Thank
7 you very much. All right, no other comments?
8 All right. Let's, any discussion by the Members?
9 Okay. Moving onto item Number 4, which is, help
10 me out.

11 MR. GALE: We have no comments on
12 fracture mechanics?

13 CHAIRMAN DANNER: No.

14 MR. GALE: Okay. Well then we could
15 actually move on to discuss of the strengthening
16 IM assessments, which was our next item on our
17 agenda. But the sick house here to my right is
18 trying to debate who has the voice that can talk
19 to us.

20 CHAIRMAN DANNER: I'm sorry, I didn't
21 hear that.

22 MR. GALE: Yes, the sick ones to my

1 right is trying to figure out who has the voice
2 who can talk to us right now.

3 CHAIRMAN DANNER: Okay. Okay. All
4 right, so item Number 3, strength of assessment
5 requirements.

6 MEMBER ALLEN: The slide number is
7 sitting different than mine.

8 Whoops. I'm controlling one, but not
9 the others.

10 Okay just to, the other items we've
11 got on the agenda for today as far as we can get.
12 Number 1 would be 192.493, industry standards for
13 ILI. And there's three standards there we will
14 go through. 192.921(a) again, expand assessment
15 methods allowed throughout. 192.923(b) and 927
16 is internal corrosion direct assessment. 923(c)
17 and 929 is stress corrosion cracking DA.

18 Appendix F is guided wave ultra-
19 sonics. And as we had stated earlier, that is
20 trying to put into the code in Appendix F the
21 requirements that's the 18 points that we've been
22 using for ten years now for operators on the gas

1 side and the liquid side coming into PHMSA to be
2 able to use like for case crossings and things
3 like that.

4 And one thing only, on the guided way
5 that was the criteria we came up there was based
6 upon a research project we had. We worked with
7 industry to come up with the 18 points that are,
8 and to my knowledge there hasn't been an incident
9 or an issue from using a guided wave the past ten
10 years that it has been employed.

11 And then the last is 192.150, passage
12 of internal inspection devices. We'll go through
13 that. Well my control won't work. Okay.

14 The first item we'll go through in the
15 strengthening standards would be the issue or the
16 item to go through is the current regulations are
17 solid on a number of issues of the impact the
18 quality of effectiveness of ILI.

19 And based upon input that we've got
20 from industry and others is we're looking at
21 incorporating by reference three industry
22 standards, API standard 1163 for inland

1 inspection systems qualification.

2 Also ANSI/ASNT for ILI-PQ, inline
3 inspection personnel qualification and
4 certification. And also NACE SP 0102 for inline
5 inspection of pipelines.

6 We propose to also to clarify that
7 operators must consider uncertainties in reported
8 results in identifying and characterizing
9 anomalies in 921(a)1, and to limit the use of
10 direct assessment only the segments that cannot
11 be inspected by inline inspection tools in
12 921(a)6. And the basis for this was a petition
13 for rulemaking submitted by NACE in 2009.

14 Our next slide we'll go back through
15 for these proposed changes. Comments that we got
16 on record, this is a summary of them. Many
17 commenters supported the proposed changes.
18 Commenters suggested that the rule should
19 reference the latest versions of the standards,
20 which we agree.

21 And again, PHMSA agrees that the most
22 recent versions of the standard should be

1 referenced. And we would handle that upon if it
2 is agreed upon and voted upon to include these.

3 Recommendations of the standards
4 should not be requirements, and PHMSA believes
5 the recommendations in these standards are
6 important to realize the safety benefit of the
7 standards.

8 Also, a comment we got was that
9 inclusion of a ASNT ILI-PQ standard applies to
10 employees of ILI service providers. And the
11 comment was it is unnecessary to incorporate it
12 by reference since API 1163 requires that
13 providers of in-line inspection services ensure
14 that their employees are qualified according to
15 ASNT ILI-PQ.

16 And PHMSA's comment on that was
17 according to API 1163, the three reference
18 standards have been developed to enable service
19 providers and pipeline operators to provide
20 rigorous processes that will be consistent to
21 qualify the equipment, people, processes, and
22 software that's utilized in ILI inspection.

1 The next item, or comment we got was
2 exclude requirements contained in API 1163 which
3 is the inline inspection systems qualification
4 standard, Section 11, quality management system.
5 And again, PHMSA believes that the required
6 conformance with the quality standards will
7 enhance pipeline plan safety.

8 Can you get the other slide to move?
9 Something's happened. You're leaving it there?
10 Okay.

11 The next comment that we got was ILI
12 vendors may not be able to meet the 90 percent
13 tool tolerance specified in the referenced
14 standards. And our comment there was that the
15 referenced standards are consensus industry
16 standards. And PHMSA agrees that the industry
17 committee that developed this standard, that the
18 tool performance standards are needed and
19 achievable.

20 Also another comment we got was to
21 relocate 493 requirements to a different subpart.
22 And you can see the subparts there that are

1 listed. Give me one second, I've got to get a
2 cough drop.

3 I'll finish it.

4 I think we need a doctor.

5 (Laughter.)

6 MEMBER ALLEN: And I think Drue's come
7 in and sit over here by me, and she's gotten it
8 also. So, anyway PHMSA believes that 493 is an
9 appropriate place for this requirement, since ILI
10 would be required for both HCAs and non-HCA pipe
11 segments.

12 Also, a comment we got was to restore
13 the reference to B31.8S in 192.921. And PHMSA
14 comment there is that we believe that the
15 industry standards in 493 are better than B31.8S
16 for this. And also we note that currently
17 921(a)1 only requires that operators follow
18 B31.8S, Section 6.2 in selecting the appropriate
19 ILI tools and does not address how the assessment
20 is performed.

21 MEMBER ZAMARIN: Another Commenter
22 stated that in 192.921(a)1, acknowledged that

1 some of the listed activities to verify tool
2 performance were typically performed after
3 anomalies are characterized.

4 PHMSA commented that we do not intend
5 the language in 921(a)1 be interpreted outside
6 the usual practices for performing the listed
7 activities as outlined in standards incorporated
8 by reference in the new 943 at 493.

9 A commenter disagreed with adding
10 explicit requirements for a no objection letter
11 for notifications of using other technology. And
12 PHMSA comments that as we have in previously,
13 that the no objection letter in responses to
14 other technology notifications is the usual
15 existing practice that has been implemented, what
16 we consider, very successfully since the
17 inception of the integrity management rule.

18 Thank you, Mr. Chairman.

19 CHAIRMAN DANNER: All right, thank you
20 very much. So now let's take public comment on
21 industry standards for ILI. Go ahead, sir.

22 MR. REYNOLDS: Good morning. My name

1 is Lee Reynolds. I'm with NiSource. We're
2 primarily a distribution company, but we do own
3 and operate approximately a thousand miles in
4 transmission line in seven states.

5 In regards to the consensus standards,
6 or the incorporation by reference in PHMSA in
7 its, I believe it's a change in its practice on
8 previously incorporating, especially new ones, of
9 consensus standards into the regulations.

10 Previously it had been that you shall follow the
11 recommendation, I'm sorry, follow the
12 requirements.

13 This go around in the last year or so,
14 especially with the gas transmission storage rule
15 as well as in this particular rule, is now
16 codifying that to incorporate that the operators
17 are to required to follow the shall statements as
18 well as the recommendations, which is concern
19 because I'm probably one of quite a number of
20 folks in the room that are working on the various
21 consensus standards organizations such as NACE,
22 ASME, and others. And these typically standards

1 are international standards as well.

2 The concern on these, my concern
3 specifically, is in regards to with PHMSA moving
4 towards now incorporating into the federal code
5 the should statements, my concern is is that for
6 those who participate on the consensus standards,
7 will there be an effort that may be to those
8 folks really, really strongly think about how
9 much should statements now should be incorporated
10 or placed in those consensus standards. Probably
11 in concerns of that those eventually will be, you
12 know, incorporated into the US Code.

13 So I think we may find there may be
14 some concerns around limiting then maybe the
15 effectiveness of these consensus standards on a
16 path forward basis. For example, in regards to
17 the API, the three documents that NACE, the ASNT
18 and the API documents, the three for specifically
19 for 192.493 that's being proposed, if you tally
20 up there's 234 shall statements. So those will
21 be and I think industry overall are in agreement
22 that those would be incorporated as must be

1 required.

2 But historically the should statements
3 is left to the operator what makes sense, you
4 know, for their operations. In that case, for
5 these three documents there's a total of 231
6 should statements.

7 So that is a concern now, especially
8 dealing with our contractors, because these
9 standards are meant to provide those flexibility
10 of the shoulds based on certain situations that
11 are applicable to their systems.

12 Also from an industry perspective,
13 it's not clear on how PHMSA it will be treating
14 the may statements. In these three documents
15 there's 179 may statements. So would PHMSA be
16 considering those to also be considered
17 recommendations. Thus, we shall follow those.

18 So I urge the Members of the GPAC
19 Committee strongly consider the path forward on
20 incorporating the, you know, the mandates of all
21 the recommended statements in these consensus
22 standards.

1 Again, primarily is the concern is
2 that we will start to see maybe really people
3 thinking at the table when their writing these,
4 around placing those should statements on a path
5 forward basis into these consensus standards.

6 Thank you for the opportunity for the
7 comment.

8 CHAIRMAN DANNER: Thank you. Others
9 who wish to address this topic?

10 MR. KIVELA: Hello, Rick Kivela with
11 Enbridge. I wanted to express a concern that was
12 raised yesterday about a --

13 CHAIRMAN DANNER: I'm sorry, could you
14 speak more closely to the microphone?

15 MR. KIVELA: Yes. I wanted to express
16 a concern that was expressed yesterday as well
17 about the limitation on using direct assessment
18 to non-piggable lines. When it comes to stress
19 corrosion cracking direct assessment as was
20 commented yesterday, it's a very valid tool for
21 screening lines that have never experienced
22 stress corrosion cracking before, but they are

1 susceptible to that threat.

2 So I would encourage PHMSA to consider
3 the use of SCCDA to still be a valid assessment
4 method. This is especially concerning given the
5 advisory bulletin that PHMSA issued earlier this
6 year on deactivation of threats.

7 In that advisory, it stated that the
8 threat of SCC should always be considered active,
9 even though that would cover pipelines that
10 consensus standards have identified as not having
11 the SCC threats.

12 So given the proposed requirement in
13 the rule and that advisory bulletin, operators
14 would be forced to run SCC ILI tools in lines
15 where the threat doesn't even exist. Thank you.

16 CHAIRMAN DANNER: All right, thank
17 you.

18 MR. OSMAN: Good afternoon. C.J.
19 Osman from INGAA. Couple of comments related to
20 the use of ILI here. I just want to make sure
21 that in looking at this rule, PHMSA allows
22 operators to select a tool appropriate to

1 evaluate the specific threats to the pipeline
2 that are of concern.

3 And specifically, PHMSA is proposing
4 that the ILI tools that are used to comply with
5 192.921(a) be capable of detecting material,
6 cracking, crack like defects, hard spots of
7 cracking, as well as corrosion, deformation of
8 mechanical damage.

9 This is really a comment related to
10 just drafting, but words do matter. The way that
11 a propose regulatory language is drafted, it can
12 be implied that an operator must utilize an ILI
13 tool or a series of tools that are capable of
14 detecting all of these threats in all situations.

15 Currently, operators select ILI tools
16 to identify the specific threats that are of
17 concern for the segment, for the specific
18 segments in question. So I want to make sure
19 that is retained and discussed by the GPAC.

20 Additionally, PHMSA is proposing in
21 this section that persons qualified by knowledge,
22 training and experience, must be used to analyze

1 the data from the ILI tool. Of course, data must
2 be reviewed by knowledgeable individuals.

3 However, we're a little concerned that
4 PHMSA's proposed language under 921(a) here is
5 duplicative and confusing in light of existing OQ
6 requirements in IM under 192.915, as well as a
7 proposed revisions to 192.423 that are also being
8 discussed in this section.

9 So I just want to make sure there's
10 clarity there and there's one qualification
11 requirement and not different requirements in
12 different places. So thank you.

13 CHAIRMAN DANNER: All right, thank
14 you.

15 MS. BYRNES: Good morning. I'm
16 Corinne Byrnes from National Grid. I have a
17 comment relating to limiting the use of ECDA as
18 an assessment tool to only those pipelines that
19 don't, that are not ILI capable.

20 I spent about 13 years of my career in
21 National Grid performing and overseeing ECDA
22 assessments throughout our territories.

1 I believe a lot of this recommendation
2 comes from the NTSB gas transmission pipeline
3 safety study which stated that unlike ILI and
4 pressure tests in which the integrity of the
5 entire pipeline segment is examined, direct
6 assessment methods, including external corrosion
7 direct assessment, internal corrosion direct
8 assessment, and stress corrosion cracking direct
9 assessment, says only the integrity of selected
10 pipe areas where the operator suspects a problem.

11 Therefore, direct assessment provides
12 information only about the threats that the
13 operator is specifically looking for and
14 locations where the threats are suspected. And
15 it also states choosing to use direct assessment
16 for a pipeline segment therefore requires
17 justification for assigning of very high risk to
18 corrosion threats.

19 As we know, this is really not
20 entirely true. ECDA, in particular, is a four
21 step process which can be and is typically done
22 over an entire pipeline segment, not a specific

1 area.

2 ECDA is a four step process which
3 includes pre-assessment using knowledge about the
4 pipeline and the history of the pipeline,
5 historical data, feasibility, survey records,
6 indirect inspections using highly accurate and
7 sensitive inspection tools to do an overland
8 inspection of the entire segment. Direct
9 examination of locations where you suspect that
10 there may be an indication.

11 And this to me is the step that the
12 NTSB report was calling out. And I think there
13 may have been a misunderstanding about how this
14 tool is used.

15 And then a post-assessment, which
16 includes analysis of data collected to assess the
17 effectiveness of ECDA and to determine
18 reassessment intervals. So I request that the
19 Committee review that section under 192.921(a).

20 CHAIRMAN DANNER: Go ahead, sir.

21 MR. BUBENIK: My name is Tom Bubenik
22 at DNV GL. I wanted to comment on one of the

1 slides that talked about the confidence interval
2 for inline inspection tools at a target value of
3 90 percent.

4 Ninety percent is an aspirational
5 goal. It's one that many of the tools that are
6 out there today would not meet. Some would, but
7 many would not. I think you've already got in
8 the planed regulations the requirement to take
9 into account the tolerance on the inspection
10 tools, and I would encourage the Committee to
11 maintain that, taking into account the tolerance,
12 but to loosen the requirement for 90 percent
13 confidence.

14 CHAIRMAN DANNER: All right, thank
15 you. Any other comments? Okay, I'll turn to the
16 Committee. Any discussion on industry standards
17 for ILI? All right, Andy?

18 MEMBER DRAKE: Andy Drake with
19 Enbridge. I think we heard some good comments
20 from the public. Particular couple that
21 resonated with me was on slide 118 you were
22 talking about can't use DA on piggable segments.

1 I do think the SCCDA issue needs to be
2 deliberately considered on how to create caveat
3 for that.

4 The SCCDA in my opinion is working
5 more reliably than in my inspection tools on DA
6 for gas pipelines. And I think in combination, I
7 think Rick mentioned that in combination with the
8 advisory bulletin we got, we must consider SCC
9 active everywhere. We know that's not right.
10 And we need to create the technical caveats and
11 criteria around when SCC is active, which is very
12 clearly recognized in industry standards.

13 So the bulletin kind of throws
14 everything into the pot, and that's not helpful.
15 We're doing now what we would be required to do
16 SCC investigations on pipe that we just put in
17 yesterday without the pipe coded pipe. That's
18 not constructive. And so I think we need to just
19 dial that in a little bit.

20 I do appreciate the comment about 90
21 percent tolerances. I just think we need to be
22 deliberate with that, which you know not all

1 tools are at 90 percent on all threats.

2 And so I think we need to be a little
3 bit more careful as we marshal a broad sweeping
4 threshold of tolerance for all tools. But in
5 general, very supportive of this direction that
6 we're going. I think the standards are a good
7 step for us.

8 CHAIRMAN DANNER: All right, thank
9 you. Sara?

10 MEMBER GOSMAN: Sara Gosman. So on
11 this set of issues, I just want to make the point
12 that whenever we consider these standards, we
13 need to think about whether the public has access
14 to them.

15 And so in just reviewing this, I note
16 that the API standard that we're talking about,
17 1163, is available on the web site for \$131.00.
18 And the ANSI standard for 48 for non-members.
19 The NACE standard is available to the public in
20 their reading room.

21 And I think I'd like to make a process
22 point that, you know, if we're going to be

1 considering standards like this for adoption in
2 the rules, it's not just the adopted standards
3 that matter for public understanding of
4 rulemaking, it's the proposed ones.

5 In fact, I would argue that maybe it's
6 more important because that's the set of issues
7 where the public comments. And I think it's
8 critical that we have those available.

9 And then as to the question of
10 requirements versus should, so I think this
11 points out a difficulty in adopting these kinds
12 of standards. That is they're really not written
13 as enforceable standards in the way that a
14 regulator would write them.

15 So in terms of how we might address
16 that, I think the thing to do would be to go to
17 the standard and individually decide on the
18 provisions that are important to the safety goal
19 instead of adopting it wholesale including terms
20 like should, because even when you say these are
21 requirements in the regulation, when you go up to
22 the text of the standard and it says should, I

1 think it's just confusing as a regulatory matter.
2 Thanks.

3 CHAIRMAN DANNER: Thank you. And I
4 had a question about that too. It's really a
5 legal question. Can you incorporate by reference
6 a standard that is not publically accessible
7 except at costs? Would that meet the
8 requirements of administrative law? So I would
9 pause at that question.

10 Okay, Cheryl and then Chad.

11 MEMBER CAMPBELL: Thank you, Mr.
12 Chair. I wanted to make a comment about the use
13 of direct assessment and having done, and I'm
14 just going to state publicly that I tend to have
15 a preference for ILI for a variety of reasons,
16 but recognize its limitations as well as the
17 limitations of DA.

18 So I think my comment is really more
19 around encouraging us to not necessarily take
20 tools out of the toolbox, but maybe provide
21 clarity where needed around when those different
22 tools might be applicable or pointing people,

1 right, in the direction on how to evaluate that.

2 I think it's, you know I've been
3 through a lot. My company has been ILLing since
4 2008, and I spent more time at an interstate
5 pipeline prior to that where that is what we did
6 regularly. It's interesting the things I've seen
7 throughout my career, right, where we found and
8 not found with the different tools.

9 So they have continued to improve. I
10 have seen it happen more rapidly in the last five
11 or ten years, which gratifies me greatly. But,
12 you know, I'd like to have more tools in the
13 toolbox, right, with maybe some standards or some
14 help for operators to understand when the right
15 tool should be used as opposed to removing a tool
16 from the toolbox.

17 AS to SCC and SCCDA, I agree having
18 seen some interesting readouts from use of those
19 tools that suggest that I have cracks that are an
20 inch wide in my pipelines when clearly I did not.
21 You know we got a ways to go on that.

22 And again I appreciate how quickly the

1 technology is moving forward, but, you know, the
2 assumption that it's active everywhere is a
3 difficult one for operators to deal with on a
4 regular basis.

5 So you know, I think we have to find
6 an interesting balance. We need to allow the
7 technology to move forward. We've also got to be
8 clear about operators not missing those threats,
9 right? And not forgetting about certain threats
10 on certain pipelines.

11 So I think it's a tough balance to
12 write in code, Alan. I really do. I get the
13 challenge, but again would encourage us to have a
14 broad view of the tools in the toolbox.

15 CHAIRMAN DANNER: Chad.

16 MEMBER ZAMARIN: Chad Zamarin with
17 Williams. I think my only comment is I would ask
18 that we look at adopting the no objection letter
19 language that we approved in 192.607 in this
20 section as well. Thank you.

21 CHAIRMAN DANNER: All right. Mark?

22 MEMBER BROWNSTEIN: So the questions

1 with regard to adopting the standards by
2 reference has got me thinking a little bit. What
3 happens, just as a factual matter, what happens
4 when an underlying standard that's being
5 referenced is changed by that body?

6 So for example, we were you know
7 referencing a certain API standard or for that
8 matter an ASME or whatever, what happen when that
9 standard is changed?

10 CHAIRMAN DANNER: So I can tell you at
11 the state level, you do incorporation by
12 reference at a regular period. So you're
13 constantly updating. So on an annual basis we
14 have a rule making for incorporation by
15 reference.

16 So if we are referencing a CFR and
17 that CFR changes, we have adopted the new CFR on
18 an ongoing basis. But I'll turn it over to John
19 and John can address that for PHMSA.

20 MR. GALE: Sure, sure. Thank you.
21 John Gale, PHMSA. Mark, what we do is we adopt a
22 very specific addition. We adopted, for example,

1 addition five for a given standard. We can't
2 just adopt a standard and any subsequent
3 additions. We're not allowed to do that per
4 federal registration requirements.

5 So if there's a revision, we have to
6 go through another rule making exercise and
7 propose and then adopt it. I'm going to real
8 quick, I'd like to discuss real quick the
9 availability issue because we have a requirement
10 under Section --

11 I'm sorry. Regarding availability, we
12 have a requirement actually in our statute under
13 Section 24 of the 2011 Act to make statements
14 available to the public for free. And we do that
15 when, ever since the institution of that
16 requirement.

17 We either make it available on the
18 internet. We make it available through what we
19 call a take-it take-it program where you can call
20 us up and get access. We work with the SDOs to
21 make most of these available. And in some cases,
22 if we have to, we'll get copies.

1 But we do, when we publish rules at
2 the proposal and at the final rule stage, try to
3 make them available, or make them available to
4 the public for free of charge.

5 MEMBER BROWNSTEIN: Okay, thank you.

6 CHAIRMAN DANNER: So let me follow up
7 on that because I think this morning we were
8 referencing particular standards. My guess is
9 Sara went on the internet to try to find them and
10 what came up was you could have it for \$85. How
11 does the public know that it can get around that
12 \$85 charge by going directly to you?

13 What kind of outreach, because I don't
14 think that the standard setting organizations are
15 letting people know that because they like the
16 \$85.

17 MR. GALE: Sure. Again, John Gale
18 again, PHMSA. Actually in the rule, you know
19 we'll actually have a section now in the rules
20 that, an IBR document and we'll talk about
21 availability. And on our web site we talk about
22 availability and where folks can get to that

1 information and try to point and direct them to
2 that information.

3 CHAIRMAN DANNER: Okay. Sara.

4 MEMBER GOSMAN: So yes, and I think
5 I'm very glad that the Pipeline Safety Act has a
6 provision in there that requires standard setting
7 organizations to make these standards available
8 once they're adopted.

9 But the issue here is that this is
10 still in proposal. And so as far as I, I mean I
11 went on the PHMSA web site. I looked at your
12 list. Your list is of the, of IBR. And it
13 doesn't include these proposed ones.

14 So I think that that is an issue that
15 perhaps isn't dealt with in the statute. I
16 completely take your point that, you know,
17 somebody could individually contact you and get a
18 piece of paper. I just think that's not really
19 how the public sort of engages with these types
20 of processes anymore.

21 And if they can't find it online,
22 they're probably not going to be able to find it.

1 And I thank that's, just as a matter, I mean,
2 this is an ongoing issue in the administrative
3 law community about whether, you know there is
4 fair public notice and comment as it relates to
5 standards that are not publicly available.

6 But at the very least, I think, you
7 know, if the standard setting organization knows
8 that their standard is about to be adopted,
9 that's a good thing for them to have it adopted.

10 They should make those available to
11 the public for notice and comment. And it
12 shouldn't just be the public comment period, you
13 know, of the 30 days because we're still
14 discussing this particular rule. It should be
15 through this process as well.

16 MR. GALE: And thank you.

17 CHAIRMAN DANNER: John?

18 MR. GALE: Yes, John Gale again,
19 PHMSA. Thank you again for that information.
20 We're committed to making those standards
21 available, not just after the final rule, but
22 also at the proposal stage so the public does

1 have the information they need to effectively
2 comment on those rulemakings.

3 So I guarantee you, I'm going to
4 personally check into availability of those
5 standards regarding this rule and at the proposed
6 rule stage. And if it wasn't available, we're
7 going to try to make them available as quickly as
8 possible.

9 CHAIRMAN DANNER: All right. Alan?

10 MR. MAYBERRY: Just to reinforce that
11 point. Yes, we'll take a look at that. I think
12 that's very important, especially as we're in the
13 proposal stage.

14 Just a general comment, taking a step
15 back on what we're trying to accomplish here
16 though. Related to EDCA and the different DAS,
17 you know, really what lead us here, here again is
18 an accident where an operator used or relied on
19 ECDA where they probably should, they should have
20 relied on something else. And that's really what
21 we're after.

22 You've got to use the right tool in

1 the right location. Our goal here is not to
2 limit the ability to use the best tools. So
3 we've heard comments, we've gotten comments on
4 the docket as well and we'll take that up for
5 consideration as we come back, you know, with
6 something to vote on here.

7 CHAIRMAN DANNER: All right. Thank
8 you. John your card is still up. Are you?
9 Okay. All right. I see no further cards up.
10 Are we ready to move on to 921(a)? All right.

11 Expand assessment methods allowed for
12 IM. Are there any public comments on this
13 provision? Oh, are we going to have a briefing
14 on? We're done with ILI for now. Is there --

15 MR. MCLAREN: Excellent. Within the
16 strengthening assessment requirements, the second
17 item is to expand assessment methods allowed for
18 integrity management in 192.921(a), 506 and
19 Appendix F. The issue is the current regulations
20 are silent on the use of certain integrity
21 assessment methods that are acceptable assessment
22 methods.

1 PHMSA proposed in the MPRM to add the
2 following methods as allowable assessment
3 methods, spike hydrostatic pressure test,
4 excavation and in situ direct examination, guided
5 wave ultrasonic testing conducted as described in
6 Appendix F, and the limit the use of direct
7 assessment to lines that are not piggable.

8 The basis is that the operator should
9 be able to take credit for integrity assessments
10 conducted using methods that are not explicitly
11 listed in the current rule without the need for
12 submitting a notification.

13 One commenter proposed that language
14 under 921(a)1, which is to require persons
15 qualified by knowledge, training, and experience
16 analyzed ILI data, is duplicative and confusing
17 in light of existing of operator qualification
18 regulations under IM 192.915, as we've heard
19 commented also here today.

20 And PHMSA agrees that the language in
21 921 regarding qualification of persons is
22 duplicative with existing code requirements in

1 915(b) and proposes to withdraw this duplicative
2 language.

3 Another commenter requested that
4 clarity on apply one or more of the following
5 methods for each threat to which the covered
6 segments is susceptible. At least one assessment
7 may be required for each threat. Current
8 proposal would virtually mandate the assessment
9 of all nine threats.

10 Clarify that every ILI assessment does
11 not require crack tool, and that tools are driven
12 to be identified or driven by the identified
13 threats under 921(a)1 and 937(c)1. PHMSA's
14 response is that the list of allowed methods in
15 921 does not drive with which methods must be
16 used in any particular circumstance.

17 Selection of assessment methods is
18 identified as part of the operator's threat
19 assessment. If the pipeline is not susceptible
20 to a particular threat, then the operator is not
21 required to conduct an integrity assessment for
22 that threat. The proposed rule would not change

1 that approach.

2 Another commenter stated that PHMSA's
3 proposing to add requirement on the detection of
4 anomalies which many ILI tools cannot meet. For
5 example, hard spots, environmentally assisted
6 cracking, and girth wells.

7 PHMSA's response is that the existing
8 regulations already require an integrity
9 assessment for all threats to which the pipe is
10 susceptible. There is at least one integrity
11 assessment method considered suitable for any
12 threat, and that is hydro testing.

13 A commenter supported a spike hydro
14 test only for time definite cracking threat, such
15 as stress corrosion cracking. The requirement
16 for spike hydrostatic testing for materials and
17 constructural related defects should be deleted.
18 A pressure test to 1.25 MAOP for class one and
19 two and 1.5 MAOP for three and four is adequate
20 to address those threats.

21 PHMSA's response is that the notation
22 in proposed 921(a)3 about spike hydro test being

1 suitable for crack defects does not require spike
2 hydrostatic test in any situation. Rather, it
3 merely communicates the situation where spike
4 hydro test would be suitable such as any crack
5 defect has the potential for growth during
6 pressure testing.

7 Spike hydro testing is an integrity
8 assessment method for any crack or crack-like
9 threat, and the rule would not require a spike
10 hydrostatic testing exclusively to assess
11 cracking threats.

12 Another commenter recommended striking
13 the language in 921(a)7 regarding the no
14 objection letter. Concerns with efficient timely
15 reviews or allow an operator to proceed with the
16 new technology if a no objection letter as
17 noticed to PHMSA is not received within 45 days
18 prior to the plan to use the other technology.

19 PHMSA commented again that the
20 issuance that the note objection letters is
21 consistent with the longstanding practice for
22 notifications under integrity management.

1 An industry commenter objected to
2 restricting direct assessments to only non-
3 piggable line segments. However, CPUC, the
4 California Public Utility Commission, commented
5 that direct assessment must always be
6 supplemented with other methods such as inline
7 inspection or pressure test.

8 Further, NTSB urged PHMSA to ensure
9 the regulations that result from this NPRM
10 address all elements contained in safety
11 recommendations P15-18, 20, and 21 regarding
12 upgrading lines to be piggable and prohibit
13 direct assessment.

14 PHMSA responds that removing the
15 restrictions on the use of direct assessment only
16 if the line is not piggable would not be
17 responsive to the intent of the NTSB
18 recommendation. Direct assessment should be
19 considered only when better methods are
20 impracticable.

21 PHMSA supports the NTSB goal of
22 increasing the percentage of lines that are

1 piggable and minimizing the use of direct
2 assessment, but believes a mandatory prohibition
3 on the use of DA would not be cost effective.

4 Thank you, Mr. Chairman.

5 CHAIRMAN DANNER: All right, thank
6 you. Now I will entertain public comments. Are
7 there any commenters on this section?

8 MS. KURILLA: Hi, Erin Kurilla, APGA.
9 I just want to make a comment on that last slide
10 concerning direct assessment. It's the
11 industry's position that, and I'm kind of
12 reiterating a couple of the other public comments
13 from the last session, is that DA is an excellent
14 tool when identifying the threat of corrosion on
15 a pipeline.

16 The concern that you see trying to be
17 summarized by the public, written comments, is
18 around the language that PHMSA used in 192.921,
19 and also 710 when we get to the other assessments
20 outside of HCAs, is that the operator is required
21 to eliminate the possibility of using any other
22 assessment method, and pressure testing is always

1 an assessment method.

2 And so each and every time an operator
3 wants to use DAS specifically to find corrosion,
4 they would have to prove that pressure testing is
5 impracticable. And that just puts an odd burden
6 on an operator to prove their use of a great tool
7 to identify a specific threat. I don't think
8 that's the intent, and I like the last bullet
9 from PHMSA.

10 But, just want to put that on the
11 record. That I think we agree with PHMSA's
12 intent, but just are little concerned with the
13 code language. Thanks.

14 CHAIRMAN DANNER: All right, thank
15 you.

16 MR. OSMAN: C.J. Osman from INGAA.
17 Just two quick comments, first one related to
18 192.506, methodology for spike testing. We
19 recommend that the spike test pressure be
20 conducted to a minimum of a hundred percent SMYS
21 as opposed to 105 percent of SMYS as currently
22 proposed.

1 There has been, as was mentioned in
2 previous days, there's been several opportunities
3 for research on this topic that have validated
4 100 percent minimum SMYS requirement.

5 Dropping the minimum SMYS percentage
6 from 105 percent to 100 percent, while the
7 minimum impact on the margin, but will
8 drastically reduce the likelihood of pipe damage
9 during the spike test and increase the mileage
10 that could be included in a single test,
11 therefore increasing the effectiveness of that
12 tool.

13 Also in this section, PHMSA should
14 specifically address time dependent cracking as
15 the threat managed by spike testing, such as
16 stress corrosion cracking.

17 And then separately on Appendix F with
18 respect to the use of guided wave, current
19 industry practice employs the longitude in the
20 signal only as a spot check to the exposed areas
21 where there is a collar is installed as opposed
22 to in all cases.

1 PHMSA has proposed procedures that
2 would require both the torsional and longitudinal
3 in the signal to be used, and that could inhibit
4 the use of guided wave. Also, PHMSA has
5 prohibited the use of guided wave on shorted
6 casings. We think the GPAC should discuss that
7 because there's value in using guided wave on
8 shorted casings. So, thank you.

9 CHAIRMAN DANNER: All right, thank
10 you. Other comments? It appears not. Could we
11 open the Committee conversation? Andy?

12 MEMBER DRAKE: Andy Drake with
13 Enbridge. I think a couple of comments that
14 resonated with me. First of all, this is very
15 good section. I don't have a lot of comments
16 here. I think just maybe some fine tuning.

17 We've certainly had a carpet bombing
18 of discussion around spike testing. Not to
19 continue that, but I think that it's relevant to,
20 and we talked a little bit about this yesterday,
21 be cautious about a required 105 percent hydro-
22 test. I think that you're looking for effective

1 separation, if the operating stress is lower than
2 72 or some percent, you're going to get the
3 separation.

4 You do have to deal with things like
5 elevation in the real world, so you deal with the
6 hydrostatic head. If we don't, 105 percent is
7 going to be above any test that this material has
8 ever seen. So that's an effective test. A
9 hundred percent is also going to be above
10 anything these pipes have seen.

11 It just starts to create a little bit
12 more practical solution. I would encourage PHMSA
13 to look at how do you create some caveats to
14 consider that separation and then deal with
15 elevation a little bit more practically.

16 I would also caution unintended
17 consequence. A whole time of 30 minutes. I know
18 you need to stabilize a test to make sure you
19 haven't happen to have any significant pressure
20 problem, like a leak or a rupture. But the last
21 thing you want to do is hold that pressure for
22 very long, because what ends up happening is you

1 start growing sub-critical time dependent defect,
2 or time independent defects, or time dependent
3 defects.

4 And that's not what you want. You
5 don't want to grow the sub-critical cracks.
6 That's where you actually create all these things
7 of making this situation actually worse. So you
8 want to grow them, get them out of there quickly
9 and then drop the pressure down.

10 I think there's other studies that are
11 out there. I know Tom Bubenik's out there from
12 the corner, him and, but ten minutes is a little
13 bit more of an industry standard. It really is
14 just trying to avoid an unintended consequence.

15 So I'd just encourage trying to look
16 at that. I think there's been a lot of research
17 done on that and I think that would be actually
18 quite constructive.

19 And the comment about guided wave UT
20 is relevant. That tool is actually very
21 important in our tool belt right now to deal with
22 unpiggable segments, and we need to be able to

1 look inside road crossings and things with this
2 tool.

3 Not having that has resulted in a
4 large number of special permit technical
5 application requests. And PHMSA, I know you guys
6 are aware of that. You certainly have that in
7 your inbox quite a bit.

8 But key to make that technology
9 practical is look at all those waivers and
10 technical applications that have been made over
11 the last couple of years and try to incorporate
12 them into the standard as best as possible and
13 make this really practical, not just a perfection
14 exercise because you're going, what if you do
15 that we're going to end up with more technical
16 waivers being submitted because we can't follow
17 the standard. So I think that's just a pragmatic
18 comment.

19 CHAIRMAN DANNER: All right. Sara?

20 MEMBER GOSMAN: Sorry. I wonder if
21 PHMSA could address two issues that I've heard
22 that I'd just like more information on. One is

1 the issue of spike testing as it relates to
2 damage to pipelines in the 105 percent. And then
3 the other is the issue is whether there are
4 benefits to direct assessment when there are
5 piggable lines.

6 CHAIRMAN DANNER: Okay. So we're
7 holding our list of questions. So, Chad?

8 MEMBER ZAMARIN: Well, I can help also
9 with that maybe. But my one suggestion on this
10 section is 192.921(a)3 on spike testing. You
11 might want to consider, like you did with guided
12 wave, just keeping it as a reference to 192.506.

13 I think the, I get a little concerned
14 with the kind of implication of kind of listing
15 all these potential threats that are trying to be
16 addressed. And when you read 506, I think it
17 does a good job of talking about time dependent
18 threats being, you know, something that stress
19 corrosion cracking is typically used to manage.

20 So I just think it might make better
21 sense not to kind of do that in two different
22 places and potentially send mixed messages.

1 Maybe just building on what Andy described, there
2 are two kind of practical issues with spike
3 testing. And he said it but just to provide some
4 context.

5 There is an upper limit at which you
6 would want to test the pipeline. You don't want
7 to go very far beyond yield because you can enter
8 plastic deformation, which is permanent damage to
9 the pipe. So what you're doing is you're going
10 to above the specified yield of the pipe, but you
11 have to make sure you don't go beyond its actual
12 deformation point. You don't want to expand the
13 pipe. You don't want to cause damage to the
14 pipe.

15 So what we do is we set a minimum test
16 pressure, and then we basically have to design
17 the length of the test section to ensure that the
18 lowest elevation point, because of the head
19 pressure of water, it's going to see a higher
20 pressure. So you need to make sure that the
21 lowest elevation point doesn't witness a pressure
22 that's too high.

1 So you're setting the whole test
2 section for a minimum test pressure, which will
3 be experienced at the highest elevation point,
4 and then you're designing the length of your test
5 section to ensure that you don't exceed some
6 upper bound at the low elevation point.

7 And what that means is when that limit
8 is narrow, so if 110 percent is your max and 105
9 is your minimum, you only have a five percent
10 band within which to design a test section. And
11 what that means is, you need more test sections.

12 You have to cut up your pipe more
13 frequently, you have to deal with water
14 management, you have to dispose of more water.
15 If you have a larger band, you can have a longer
16 test section because you have a larger variation
17 due to elevation of the pipes.

18 So that's why it is important. We do
19 worry that by going to 105 percent as a lower
20 bound, you really can't change the upper bound.
21 We typically try to keep the upper bound, you
22 know, at around 110 percent. It significantly

1 limits the amount of flexibility you have for
2 test section length. So you'll end up cutting up
3 your pipeline into multiple test sections.

4 I hope that makes sense. Typically,
5 100 percent is a commonly used approach. But I
6 think Andy's point also is, if a pipeline is
7 operating at 40 percent SMYS, I'm not sure it's
8 valuable to take it all the way up to 100 percent
9 SMYS. I mean you can, on a 72 percent SMYS pipe,
10 you're you know that's typically how we design
11 it.

12 But I don't want to over complicate
13 this section, but you might want to leave some
14 flexibility. The goal is to achieve a
15 sufficiently high enough pressure to expose
16 defects, get off that pressure quickly because
17 what Andy described is you don't want to grow the
18 smaller defects that aren't failing at that
19 pressure, because that's why it's a spike test.
20 You want to go to a high pressure for a short
21 duration.

22 If there's anything that would fail at

1 that pressure, have it fail and identify it. But
2 you want to get off that pressure as quickly as
3 possible because you don't want smaller defects
4 being exposed at a high pressure for a long time
5 and starting to grow.

6 So that's the theory behind spike
7 testing. So the two issues of trying to create
8 as much of a window as possible to better design
9 test sections and then not spend a lot of time at
10 that higher pressure.

11 And you know get off that higher
12 pressure back down to, what we then do is go down
13 to the standard eight hour test where, you know,
14 we monitor for leaks and for other, you know,
15 other potential issues on the pipe. I hope that
16 helps.

17 CHAIRMAN DANNER: All right. Andy?

18 MEMBER DRAKE: Thanks, Chad. That was
19 great. That's kind of frightening that you have
20 two metallurgists just sitting next to each
21 other, but you know. But I think it's a great
22 question. It's been something that's been

1 deliberated over a lot, a long time.

2 I'm a big fan of high pressure testing
3 and setting a big margin. I just think that
4 becomes a practical limit, especially when you
5 deal with elevation. It becomes literally so
6 tight a band because you're up against the
7 absolute strength of the pipe.

8 I have no ability to deal with
9 elevation change, which makes it impractical. I
10 can't do that. So I think that's part of it.
11 The other piece is the spike test. I know a lot
12 of people have heard about this. Why is the
13 spike test.

14 There's a family of defects that you
15 look at that will fail time independent. So as
16 you bring the pressure up, they just fail it out
17 anytime. They go right to failure.

18 The ones that you want to watch, which
19 is why you don't stay up there, is there's a
20 whole other series of sub-critical defects that
21 grow but stop. But when you de-pressure, the
22 front end of that crack collapses and that little

1 tough spot that stopped the crack is now gone.

2 So when you bring it back up in
3 operating pressure, it now can start moving again
4 at a lower pressure which is called the pressure
5 reversal. And that's what we're trying to manage
6 here because when you're dealing with cracks
7 there's a whole family of them out there. Big
8 ones, little ones.

9 And that's why you don't want to hold
10 it up at that pressure. You want to get away
11 from that pressure as quickly as possible to
12 avoid the unintended consequence of these little
13 ones growing and stopping, but now they're just
14 bigger than they were before.

15 And that literally is the mechanics of
16 the test. And so both of those things together
17 create the concern about creating a problem, an
18 inadvertent problem damaging the pipe. People
19 said damaging the pipe during the test. That's
20 explicitly why that test was designed to do that.

21 CHAIRMAN DANNER: Okay. So, let's
22 see, there's a slide up there. Shows where the

1 105 comes from. One of the questions that I had
2 is there's a slide 131, or it's 131 in my book,
3 it's different up there. But it says that DA
4 should only be considered when better methods are
5 impracticable.

6 And the question I had is what kind of
7 showing does an operator have to make that other
8 methods are impracticable before they can start
9 DA? What kind of record keeping, or what kind of
10 burden of proof do they have?

11 And I see Steve's card is up. So I
12 don't know if you want to answer that one or if
13 you want to answer the one before.

14 All right, go right ahead.

15 Just don't lose sight of the one I
16 asked.

17 MEMBER ALLEN: Bobby, put 59 back. I
18 just wanted to give a little comment there. Is
19 this slide again, well hold on until we get it
20 up, is this slide here shows and number one, if
21 you've got cracking issues in weld seams and you
22 look at the red line, the 105 percent in, and if

1 you go on over you'll see a number that's a 0.8
2 and a 1.0. And you know your normal 90 percent
3 or 1.25 test would be right in between the eight
4 and the one.

5 And the point is, is if you had a test
6 there, that test is not going to be high enough
7 to effectively test for most of the defects you
8 would see in low frequency ERW. And the key is,
9 is what is that sweet spot. Sometimes, and the
10 reason at the time we selected to come out and
11 with the 105, if you look, it covers the majority
12 of the issues.

13 Now realizing, like we had said
14 yesterday, is depending upon the type defects
15 threats you're looking at, we would expect, and
16 what Chad or Andy or a combination of both would
17 say, in the 100 percent or 1.39 times MAOP or
18 1.5, you know, I think we all discussed all of
19 those yesterday, would be the flip side because
20 if you got pipe that's operating at 50 percent
21 SMYS, there's really no reason to bring it up to
22 100 percent or 105.

1 So what we would do is go back and
2 adjust that language to take care of those
3 different type parameters. As far as, switching,
4 as far as the time interval, I've seen research
5 anywhere from ten minutes, fifteen minutes to an
6 hour.

7 The latest that we got on the low
8 frequency ERW is that there's not much difference
9 in the 15 minutes to an hour, or the 30 minutes
10 to an hour, but the key part is whether any of
11 those that need to be stabilized before it
12 starts.

13 So I wouldn't agree with three minutes
14 or five minutes or something like that. But
15 we're arguing around the edges or we're talking
16 about the edges. We're not very far apart is my
17 point on what everybody's saying.

18 So, and like we said yesterday, we'll
19 go back and look at this and when we come to the
20 next meeting, we'll do just like we've done at
21 the other meetings and propose something.

22 CHAIRMAN DANNER: All right, thank

1 you. Any other cards up? Sara?

2 MEMBER GOSMAN: So in looking at 506,
3 there's an alternative technology or alternative
4 technical evaluation process. So I'm just
5 wondering if some of the concerns that have been
6 raised here can be evaluated through that
7 process, if that was the purpose of that or there
8 was another reason for that?

9 CHAIRMAN DANNER: Yes, Steve?

10 MEMBER ALLEN: We've tried in most of
11 these areas is it's like the congressional
12 mandate and also NTSB, is to be open to other
13 technology. It's just to give the avenue that we
14 don't have to go through a special permit type
15 process.

16 That if an operator, if a service
17 provider comes to an operator with a better
18 methodology for us to be able to review it, and
19 timely get back to the operator. So that's why
20 that's in there.

21 CHAIRMAN DANNER: Go ahead. Sara?

22 MEMBER GOSMAN: Okay, so just to

1 follow up on that. It seems to me that there
2 might be some technical issues that need to be
3 worked through in the language.

4 But to me, what this provision looks
5 like is exactly what I would hope, which is a set
6 of requirements that would work, hopefully, in
7 most situations and then a catch all provision
8 that says if it doesn't work, come to PHMSA, give
9 us your information. And if we have a problem
10 with it, we'll object. So I think that's a good
11 system.

12 CHAIRMAN DANNER: All right, Steve?

13 MEMBER ALLEN: And we're doing that
14 as we'd said yesterday, in other areas like using
15 the emap tools in inline inspections. There's
16 been several operators to come to us that we were
17 through or have worked through using those on
18 their systems.

19 And methodology is what I, what it
20 allows us to do and it's similar to what we did
21 on guided wave UT, we actually go through that
22 process and get what we're going to put in the

1 code or proposed to be going into the code later
2 based upon going through working through the
3 issues individually with each operator based upon
4 their threats and how they plan to use the
5 technology.

6 CHAIRMAN DANNER: Okay. Other
7 comments on this topic? Sara?

8 MEMBER GOSMAN: The other question I
9 had related to direct assessment was that, again
10 I heard, if I understood the public comment
11 correctly, there was an issue around whether we
12 should be using direct assessment in pigtable
13 lines or not because of some benefits. So I just
14 wondered if PHMSA or anybody else here could
15 address that issue for the record.

16 CHAIRMAN DANNER: Cheryl, do you want
17 to address that or --

18 MEMBER CAMPBELL: Sure, I can provide
19 a little bit of insight on that. ILI tools are
20 really great at a point in time. So, you know,
21 when you run the tool, here's what the health
22 looks like of that asset.

1 DA is really good at external
2 corrosion, for instance and it can give you some
3 insight and some guidance into where you might be
4 developing the corrosion problem whereas the ILI
5 might not be able to tell you, you know, where
6 that might happen in the future.

7 So it's a little more forward looking
8 in that respect as opposed to a point in time.
9 So the way we view them is at times very
10 complimentary, depending on what the threat is
11 for our asset.

12 So they can be used, and I have
13 frequently used them on the same pipeline. So
14 it's, you know I keep going back to it depends on
15 the threat, right? The right tools and the tool
16 box for the threat. But I am also sensitive to
17 Alan's comment about, you know, making sure
18 you're using the right tool and you've evaluated
19 the right threats for that asset.

20 And that's why I made my earlier
21 comment about providing some guidance about when
22 to use different kinds of tools for different

1 kinds of threats.

2 CHAIRMAN DANNER: Any other comments
3 on this topic? All right, Alan.

4 MR. MAYBERRY: Did you say, yes, from
5 my perspective ECDA is a good tool for if you're
6 looking for corrosion, but it's not a good tool
7 if you're looking, if you have a seams threat.
8 And it's kind of what put us here is that issue
9 there. In particular, you need to consider your
10 threats before you rely on --

11 CHAIRMAN DANNER: You had to speak
12 into the microphone, so. All right. I think
13 that's all on this topic. Are we ready to move
14 onto ICDA?

15 All right. Go forth.

16 MR. MAYBERRY: Got it. Okay. Topic
17 C of strength and assessment requirements deals
18 with internal corrosion direct assessment in
19 192.923(b) and 927. The issue is that the
20 current regulations are silent on a number of
21 issues that impact the quality and effectiveness
22 of internal corrosion direct assessments.

1 PHMSA proposes to incorporate NACE SP
2 0206 by reference and supplement the NACE
3 standard to address issues observed by PHMSA.
4 The basis for this was a petition for rulemaking
5 submitted by NACE International dated February
6 11, 2009.

7 For the MPR in comments on this, one
8 recommendation was that the standards should not
9 be mandatory. PHMSA says that recommendations in
10 the standard are items operators should do and
11 PHMSA seeks to codify that expectation as
12 applicable.

13 Another commenter said that to
14 include, that PHMSA should include reference to
15 ASME B31.8S Section 6.4 in referencing Appendix
16 B2. PHMSA responds that the ASME B31.8S is
17 currently referenced in 192.927, but the NACE SP
18 0206 is a more comprehensive standard.

19 And PHMSA believes incorporating the
20 NACE standard will provide improved and more
21 consistent internal corrosion direct assessment
22 results.

1 A commenter recommended that all
2 proposed language be deleted and that an ICDA be
3 conducted in accordance with NACE SP 0206. The
4 version approved in 2006 with only those
5 additional items that are currently contained in
6 192.927. PHMSA proposes to supplement the NACE
7 standard with additional requirements to address
8 specific issues that could adversely affect ICDA
9 results.

10 Commenter recommended removing the proposed
11 requirements to notify PHMSA 100 days before
12 performing ICDA and clarify what is required in
13 the notification.

14 PHMSA comments that for internal
15 corrosion direct assessment, notification is only
16 required for systems with electrolytes. Since
17 the NACE standard only applies to dry gas system,
18 notification in a procedural review is important
19 to assure appropriate controls are in place when
20 ICDA is applied to dry gas systems that contain
21 electrolytes.

22 And this would be another technology

1 notification in accordance with 192.921(a)4 or
2 192.937(c)(4) and the contents of such
3 notifications would be the same as currently
4 required for other technology notifications.

5 Commenter recommended removing the
6 second half of Paragraph C related to ICDA region
7 identification. Commented that using descriptive
8 wording requiring NACE SP 0206, defined DG-ICDA
9 Regions prohibits operators from using additional
10 criteria specific to the operator.

11 And PHMSA comments that the
12 supplemental language on ICDA Region is intended
13 to insure that each HCA within an ICDA Region as
14 defined in the NACE standard has an integrity
15 assessment performed.

16 A Commenter commented supporting the
17 use of pipeline specific data, but stated there
18 are many cases where conservative assumptions
19 could be applied to certain list critical data
20 elements. Also recommend that proposed language
21 about the model validation be deleted and current
22 192.927(c)(4)(ii) language be restored.

1 PHMSA responds that model validation
2 and data validation are important aspects of a
3 quality integrity assessment. Thank you, Mr.
4 Chairman.

5 CHAIRMAN DANNER: All right. Now
6 we'll open it up to public comments. Do we have
7 any public comments on ICDA? Apparently we do.
8 Go ahead, sir.

9 DR. EAGAR: My name is Tom Eager. I'm
10 a faculty member at MIT, one of the last people
11 at MIT who teaches structural materials and
12 doesn't study DNA.

13 One of my concerns as I read these
14 reports is I'm seeing Charpy values of one, two,
15 and three, and it seems to me that PHMSA should
16 request a second significant digit when they
17 report values that low. Anyone who studies
18 pressures knows that when you read a gauge you
19 don't read within the bottom five percent or
20 above 95 percent because the gauge doesn't read
21 accurately.

22 If someone tells me the Charpy value

1 is 2.2, then I don't know if that's one-half or
2 two and a half. And that's a pretty big
3 difference. If I'm going to be doing integrity
4 assessments and calculations based on the
5 measured values, I should measure them more
6 precisely. It's not hard to do, you just need to
7 use a smaller machine.

8 You don't use a machine the size of my
9 desk, you use a desktop impact tester. And those
10 are commercially available. And if we know we
11 have toughnesses, or fracture energies of this
12 value, that's what we should be using. We're
13 using the wrong machine.

14 Having said that, we're also not
15 necessarily in these models using the right
16 parameter. The correct parameter back 110 years
17 ago was the Charpy value. That's all we had.

18 Since 1950 when George Irwin developed
19 fractured mechanics at Naval Research Laboratory,
20 we've known that we should be measuring a
21 fractured toughness. And we should do all that
22 we can to start putting things in terms of not

1 Charpy values, but fractured toughness values.

2 Technology has improved over the last
3 60 years. NASA learned about fractured toughness
4 in the 1960s when they had some failures of
5 rocket motor cases. The civil engineers learned
6 about fracture energy with the Northridge
7 earthquake in the early 1990s.

8 It's time for the oil and gas industry
9 to learn about fracture toughness rather than
10 Charpy values. Let's move into the 21st Century.

11 CHAIRMAN DANNER: All right, thank
12 you, sir. Anyone else who wish to comment on
13 this item? Okay. Committee Members, discussion
14 on ICDA? All right, I'm seeing none. We can go
15 on to SCCDA.

16 MEMBER DRAKE: Thank you, Mr.
17 Chairman and the Committee. The fourth topic
18 under strengthened assessment requirements
19 regards stress corrosion cracking duressed
20 assessment within 192.923(c) and 192.929. The
21 issue is that current regulations is silent on a
22 number of issues that impact the quality and

1 effectiveness of SCCDA integrity assessments.

2 PHMSA proposes to incorporate NACE SP
3 0204 by reference and supplement the NACE
4 standard to address issues observed by PHMSA.
5 Petition from rulemaking were submitted by NACE
6 International dated February 11, 2009 as this is
7 the basis for this modification.

8 On to the MPRM comments. One
9 commenter stated the NACE recommendation should
10 not be mandatory. PHMSA's response is that
11 recommendations in the standards are items
12 operators should do and PHMSA seeks to codify
13 that expectation as applicable.

14 Commenter also stated to include
15 reference to ASME B31-8S, Appendix A3 for
16 susceptibility criteria. PHMSA responds that the
17 B31-8S is currently referenced in 192.929, but
18 the NACE SP 0204 is a much more comprehensive
19 standards and PHMSA believes incorporating the
20 NACE standard will provide improved and more
21 consistent SCCDA results.

22 A commenter recommended the proposed

1 language be deleted in SCCDA be conducted per
2 NACE 0204 with only those additional items
3 currently in 192.929, but PHMSA should not exceed
4 those established industry standards. For
5 example, the proposed rule would require a
6 minimum of two above ground surveys and three
7 direct examinations.

8 These additional requirements do not
9 account for operators to utilize other sources of
10 information, such as ILI runs to complement their
11 SCCDA results. PHMSA responds and proposes to
12 supplement NACE with additional requirements to
13 address specific issues that could adversely
14 affect SCCDA results. Operators that desire to
15 deviate from assessment requirements could submit
16 another technology notification to PHMSA.

17 Commenter commented requesting that
18 PHMSA provide technical guidance and
19 clarification. PHMSA responds that we will
20 communicate additional guidance as needed during
21 the rule implementation.

22 Commenter recommended the requirements

1 of SCCDA specify the assessments are required to
2 be conducted in an area that is most likely to be
3 subject to SCC such as within a compressor
4 station discharge regardless of HCA designation.

5 PHMSA responds that integrity
6 assessments must address high consequence areas.
7 PHMSA will consider how to structure the rule to
8 apply results to non-HCAs from non-HCAs to high
9 consequence areas.

10 Commenter recommended that the NACE SP
11 0204 rather than the NACE RP 0204 was the
12 appropriate nomenclature to use and should have
13 been made the standard rather than a recommended
14 practice. And PHMSA agrees and the number of the
15 standard will be corrected.

16 Commenter stated the requirements for
17 the spike hydrotesting requirements are covered
18 within the proposed 192.506(e) and there is no
19 need to repeat these requirements in
20 192.929(d)(4)(ii). And PHMSA concurs that the
21 spike hydrotest requirements are redundant to the
22 proposed 506(e) and will replace it with a

1 reference to 506(e).

2 Commenter stated that when calculating
3 remaining strength until such a time that the
4 requirement within 192.607 have been met or if
5 the segment under evaluation is not subject to
6 the requirements of 192.607, supportable found
7 engineering judgment should be allowed.

8 And PHMSA concurs and agrees to
9 address the gap pertaining to failure pressure
10 calculations when data is not available. Thank
11 you, Mr. Chairman.

12 CHAIRMAN DANNER: All right, thank
13 you. We'll now take public comments on SCCDA.
14 Do we have any public comments?

15 Apparently, we do not. Any Committee
16 discussion on this topic? All right. I think
17 we're ready to move on to guided wave ultrasonic
18 inspection.

19 MEMBER DRAKE: Thank you, Mr.
20 Chairman. The fifth topic around strength and
21 assessment requirements regards the use of guided
22 wave ultrasonic inspection as outlined in

1 Appendix F. The issue is that the current
2 regulations do not acknowledge guided wave
3 ultrasonic inspection, and operators are
4 currently required to submit a notification to
5 PHMSA to use guided wave ultrasonic inspection.

6 PHMSA proposes to explicitly allow guided
7 wave ultrasonic inspection in the list of
8 integrity assessment methods, and codify current
9 guidelines operators use for submitting guided
10 wave ultrasonic procedures PHMSA review in the
11 proposed Appendix F or the 18 points.

12 The basis is after many years of
13 successful application of guided waive technology
14 for integrity assessments, notifications are no
15 longer necessary in PHMSA's opinion.

16 A commenter stated that there are
17 technologies other than the GUL Wavemaker G3 and
18 G4 which should not be excluded. PHMSA's
19 response is we don't intend to preclude the use
20 of other equipment software providers besides
21 Guided Ultrasonics Limited and specified in the
22 proposed rule that operators may use equivalent

1 equipment and software with equivalent
2 capabilities and sensitivities.

3 Commenter said that the requirements
4 of both torsional and longitudinal wave modes in
5 all situations introduces unnecessary complexity
6 into the guided wave ultrasonic data
7 interpretation process. Specifically, torsional
8 wave mode is the primary wave made when utilizing
9 GWUT. Longitudinal wave mode may be used as an
10 optional secondary mode.

11 And used GWUT monitoring with a target
12 of 0.5 to 0.1 percent cross sectional area with
13 pipes up to 36 inches in outer diameter
14 complimented with a leak monitoring system at the
15 same location.

16 PHMSA's response is that the proposed
17 rule allows operators to submit notification to
18 propose different technical requirements other
19 than those specified in Appendix F.

20 A commenter stated that numerous
21 technical specification comments and suggestions
22 that there were, to delete several provisions of

1 Appendix F. PHMSA responded the existing
2 guidelines proposed to be codified in Appendix F
3 have been successfully used since the start of
4 integrity management and have evolved since then
5 into the certain text that we use. Thank you,
6 Mr. Chairman.

7 CHAIRMAN DANNER: Thank you very much.
8 Now let's take public comment on guided wave
9 ultrasonic inspection. Do we have any public
10 comments on this section?

11 Okay, we have no public comment on
12 this issue. Now committee discussion, Andy.

13 MEMBER DRAKE: Very briefly. We made
14 several comments a few minutes ago when guided
15 wave came up previously. Those comments apply
16 here as well.

17 I think the lessons learned through
18 all those waivers just need to be applied in
19 developing the standard which is exactly what
20 your comments said. So I just wanted to
21 appreciate that and kind of connect the comment
22 that we made prior into this section as well.

1 CHAIRMAN DANNER: All right. So
2 noted. Any other discussion on this issue? All
3 right. Let's proceed then to -- oh, I'm sorry.
4 Chad I didn't see your flag.

5 MEMBER ZAMARIN: Thanks. Chad
6 Zamarin, Williams. I'm like the no objection
7 process guy. It's just a little bit of a
8 different set of language that was used here. It
9 refers to two different sections of the code. I
10 wonder if that's necessary.

11 And 921(a)(7) we've already talked
12 about, but 937(c)(7) looks like it has different
13 language, don't know if that's intentional or
14 necessary. Just might be something worth looking
15 at between now and the next meeting. Thank you.

16 CHAIRMAN DANNER: All right, thank
17 you. Any other comment on this issue? All
18 right. Then let's move on to the next issue,
19 passage of internal inspection devices. So,
20 staff briefing.

21 MEMBER DRAKE: Making great progress
22 today. Thank you, Mr. Chairman. On the sixth

1 topic, the passage of internal inspection devices
2 in 192.150. The issues is the PG accident or
3 incident at San Bruno, highlighted the weakness
4 of direct assessment which is commonly used for
5 impiggable pipelines.

6 PHMSA proposed to the existing 192.150
7 requires that each new gas transmission line or
8 each replacement of line pipe valve fitting or
9 other line component in a transmission line must
10 be designed and constructed to accommodate the
11 passage of ILI devices.

12 PHMSA proposed to establish minimum
13 technical standards for this process by
14 incorporating NACE SP 0102, Section 7 by
15 reference. The basis for this are NTSB
16 recommendations P-11, 17 from San Bruno and then
17 P-15, 18 and 20 from the gas IM safety study
18 which recommended that PHMSA require all natural
19 gas transmission pipelines be configured so as to
20 accommodate ILI tools with priority given to
21 older lines, older pipelines.

22 A commenter recommended that PHMSA

1 revise the proposed regulatory language to allow
2 operators to consider the best practices and NACE
3 standard practice and implement those practices
4 that are determined to be beneficial.

5 NACE standard SP 0102 should be a
6 guidance document. Recommendations should not be
7 mandatory. PHMSA believes that all the
8 recommendations in the NACE standard are
9 beneficial to achieve the desired safety goal.

10 Another commenter commented that
11 adding new exception to 192.150(b) such as a
12 replacement of line pipe or component need not be
13 designed or constructed to allow the passage of
14 ILI devices. If the inside of the pipeline is so
15 obstructed by condensates or other solid material
16 it cannot be removed, that it is very unlikely
17 that the pipeline could ever accommodate the
18 passage of an ILI device.

19 PHMSA's response is that the purpose
20 of the rule is to upgrade pipelines to be
21 piggable whenever components or pipe segments are
22 replaced. Prior to conducting ILI, the pipeline

1 is cleaned of liquids and solids in preparation
2 for the running of smart or intelligent ILI
3 tools. Thank you, Mr. Chairman.

4 CHAIRMAN DANNER: All right. Let's
5 see if there's any public comment with regard to
6 the passage of internal inspection devices.

7 MS. KURILLA: Hi, Erin Kurilla, APGA.
8 The second to last slide that where a commenter
9 made the point that SP 0102 is largely a list of
10 best practices made me pause, and I just want the
11 Committee to stop and think about that before we
12 kind of fly through this section.

13 I personally am not super familiar
14 with 0102, but if it is, in fact, is a list of
15 best practices, by codifying both the
16 recommendations and the requirements of documents
17 that meant to be a best practices document, it's
18 kind of odd.

19 And I just think maybe I'd encourage
20 the Committee to take a closer -- I don't know if
21 we're going to move to vote today, but if we are,
22 to take a little bit closer look at what 0102 is

1 before we say for all new or rehabilitated, I
2 guess, transmissions pipelines that we require a
3 list of best practices during the construction of
4 those.

5 I just want to make us stop and think
6 about that before we truck forward.

7 CHAIRMAN DANNER: All right, thank
8 you. Other comments on this section? Committee
9 discussion? Chad.

10 MEMBER ZAMARIN: Thanks. Chad
11 Zamarin, Williams. I really like this section,
12 but I do want to just make one comment. If we
13 could go to the very first slide that introduced
14 this.

15 I just want to note that, and I think
16 Alan actually said this correctly. I think we
17 need to be careful that we don't believe that the
18 PG&E accident highlighted weakness in direct
19 assessment. I think what it highlighted was the
20 incorrect identification of threats to the
21 pipeline based on bad data.

22 You know, I don't think anyone would

1 claim that external corrosion direct assessment
2 was a tool that would be appropriate for a seam
3 defect. So I don't think it was a failure in the
4 tool, it was picking the wrong tool for the
5 threat.

6 So there's a lot of discussion about
7 the, you know, the quality and validity of
8 external corrosion direct assessment, structural
9 corrosion direct assessment, internal corrosion
10 direct assessment.

11 I just think we've got to be clear
12 that, I have no issue saying they're not good
13 tools for seam threats. But I do think we need
14 to be careful that we don't imply that that was
15 an issue of the tool being the problem. That was
16 an issue of picking the wrong tool for the
17 problem. Thank you.

18 CHAIRMAN DANNER: All right, thank
19 you. Any other comment on this issue? Okay.

20 So we have come to the end of our
21 agenda for today.

22 The question we have now is whether

1 we, are there any of these issues that we feel
2 that we have enough consensus that we could move
3 forward on, clear the deck so that we can have a
4 more focused discussion at the next meeting? And
5 I turn it over to Alan for a little guidance on
6 that.

7 MR. MAYBERRY: Yes, I think we're,
8 just based on our perspective how the
9 conversation's gone. It looks like we may have
10 the ability to present to maybe an option of
11 voting on maybe D, E, and F. Let me turn it over
12 to John to kind of carry this.

13 MR. GALE: Yes, if you just give staff
14 just a second, we're trying to get some language
15 right now to possibly get us a vote in D, E, and
16 F, if that's acceptable to the Members. We're
17 putting it together right now.

18 CHAIRMAN DANNER: All right. And
19 while you're doing that, I do want to note that
20 we did have some comment with regard to F about
21 these are being best practices and what is
22 guidance and what is mandatory.

1 MR. MAYBERRY: Chairman Danner, we're
2 about to put up the language. We tried to
3 capture the best we could and as efficiently as
4 we could. We just kind of generalized the
5 comments made by PHMSA staff and also by Member
6 Drake and Member Zamarin.

7 If you note it didn't address right
8 now, at least, the comment made by Ms. Kurilla on
9 one 150. So if we need to make additional
10 changes to this to address that, we're open to
11 those suggestions.

12 CHAIRMAN DANNER: All right.

13 MR. MAYBERRY: This is trying to
14 capture basically the proposals related to area
15 7, was it 7D, 7E, and 7F.

16 CHAIRMAN DANNER: Okay, so why don't
17 we give the Committee Members a minute to read
18 digest this.

19 MEMBER ALLEN: David?

20 CHAIRMAN DANNER: Yes, Steve.

21 MEMBER ALLEN: All right, just to
22 give one bit of clarification on the part of

1 192.150 on ILI surveys. That is Section 7 in
2 that particular portion. If you read the 151
3 language what we said is, in accordance with
4 requirements and recommendations in NACE SP
5 0102, Section 7 and Section 7 is for new
6 construction and it's planning for ILI surveys
7 when you build a new line.

8 It's a list of things that you should
9 consider and it's for planning for ILI surveys
10 when you begin the system design for new
11 pipelines. And it's a list of things, a
12 recommendations that operators should consider
13 and incorporate. It's a lot of may's and should's
14 and things like that in it. So it's not all
15 shall's or anything like that.

16 MEMBER BROWNSTEIN: Well that's -- so
17 if I may, that's exactly I think the question
18 that we're sort of -- so what's the, so at the
19 end of the day, right, what you know what would
20 you want to see, right?

21 Is the issue that you simply want to
22 know that the operator considered these things,

1 or are you suggesting that these criteria that
2 are in this are things that the operator must
3 consider, right, because, that's the ambiguity.
4 I'm just trying to understand what you were
5 thinking.

6 CHAIRMAN DANNER: That the way that
7 we've got it referenced and the way that it's
8 actually written in the standard, it would be for
9 them to consider. It's not mandatory because if
10 you go and look at the standards, there's a bunch
11 of shoulds and may's and --

12 MEMBER BROWNSTEIN: Yes, Yes, Yes.

13 CHAIRMAN DANNER: -- and things like
14 that.

15 MEMBER BROWNSTEIN: Exactly.

16 MR. MAYBERRY: If I may, what we're
17 saying is we're going to address that and pretty
18 much leave the standard as is where the shalls or
19 shall, they will be expected.

20 If it's a should it, they would need
21 to consider it and if it's relevant they would do
22 it, if not they wouldn't. In carrying out our

1 inspections we would look for that as we look at
2 how they implement the standards. So that's, we
3 had a little dustup related to this on
4 underground storage that we're working through.
5 But, you know, we --

6 CHAIRMAN DANNER: Okay. Steve your
7 card is up. Okay, Sara.

8 MEMBER GOSMAN: So just a note as I
9 read through Section 7. What I notice is there
10 are a lot of shoulds and essentially
11 considerations for, for this design. I think
12 that when I read it as a lawyer, it's hard for me
13 to see how this could be ever enforced.

14 Other than through, did you consider
15 this particular issue which may be important, but
16 isn't to me a requirement? So maybe it's about
17 considering the issues in that section.

18 CHAIRMAN DANNER: So are you
19 suggesting in that language be made more
20 prescriptive?

21 MEMBER GOSMAN: I don't think I have
22 the background to make that suggestion. But I

1 guess on the enforceability question, I think it
2 could be clearer in the text if what we're doing
3 here is using this may standard essentially to
4 guide consideration of the issues that that
5 perhaps could be clearer in the text of the
6 proposed rule.

7 CHAIRMAN DANNER: All right. Steve?

8 MEMBER ALLEN: And Sara, just what
9 you said, for them to consider this to get the
10 best practices out there so that when they read
11 the code, they know where to go to look for it.
12 The expectation is that you have to put every
13 item A, B, C, D in there, is to look at the
14 shoulds and the mayas in here and go applicable.

15 Now it would be to make your system
16 piggyback would be, but also in making it piggyback
17 it would give guidance on how you should do that
18 so that later you don't get down the road and
19 find out that it's not piggyback.

20 CHAIRMAN DANNER: Go ahead.

21 MEMBER GOSMAN: So just one last bite.
22 So the text says must be designed and constructed

1 to accommodate the passage of ILI devices in
2 accordance with the requirements and
3 recommendations in Section 7 of the NACE
4 standard.

5 So as I read that, just to be clear
6 here, what we're doing is we're requiring that
7 lines be piggable right through, by ILI. But in
8 terms of the design of those, we're directing
9 operators to Section 7 of this NACE standard in
10 order to be able to consider the issues. Okay.

11 CHAIRMAN DANNER: Okay. And I see a
12 lot of nodding around the room. So it looks like
13 that's how folks are interpreting this, is that
14 right? Okay. It sounds like we have consensus
15 then on these items D, E, and F. Is that the
16 sense? Are we ready to entertain a motion.
17 Sara?

18 MEMBER GOSMAN: Sorry, I just want to,
19 when I read revised 923(c) and 929 according to
20 the recommendations by PHMSA staff at the
21 meeting. Are you talking about the
22 recommendations in your slides?

1 Okay, thank you.

2 CHAIRMAN DANNER: Okay. Andy?

3 MEMBER DRAKE: Is there some, and I
4 don't remember the comment coming out that
5 strongly that ICDA had a list of concerns. Is
6 there a reason why it's not included in this
7 motion?

8 CHAIRMAN DANNER: John?

9 MEMBER DRAKE: I mean, C, D, E, F?

10 MR. GALE: Oh, if the members want to
11 more, we are more than welcome --

12 (Laughter.)

13 MR. GALE: I agree.

14 MEMBER DRAKE: I'm asking --

15 MR. GALE: You give us a second and
16 we'll do it.

17 MEMBER DRAKE: -- because I don't
18 remember a great deal of comments or anything. I
19 think people accept it as it was. I just was
20 curious why it wasn't put in this motion. And
21 I'm happy to make a motion actually, I think.

22 CHAIRMAN DANNER: Oh, I think Chad's

1 the motion guy, so.

2 (Laughter.)

3 MEMBER ZAMARIN: Oh, all right.

4 MEMBER DRAKE: We tag team.

5 MEMBER ZAMARIN: All right.

6 MR. GALE: Just real quick Andy.

7 Would it be appropriate to create a bullet

8 similar to the first one there for IDCA?

9 MEMBER DRAKE: Yes, I think so. Yes.

10 MR. GALE: Okay. All right. By the
11 way, while we're waiting for this to be typed, I
12 would like to thank the PHMSA staff to my left
13 who do a very great job of, under a lot of
14 pressure to get this stuff done and up on the
15 screen the way they do.

16 MEMBER CAMPBELL: I do wonder though,
17 Mr. Chair, if we should make a motion to separate
18 the two meddlers just at the next meeting. Just
19 saying.

20 CHAIRMAN DANNER: Yes, okay. Sara?

21 MEMBER GOSMAN: Also, if we could just
22 clarify what we mean by revised the no objection

1 process as recommended by members at the GPAC
2 meeting. For example, I notice there was a state
3 notification provision in one of the no objection
4 provisions that we looked at.

5 And I don't know, I mean I don't know
6 if that was part of the concern here or not. Or
7 if what we're really just talking about is the
8 put in material, if after a certain amount of
9 time, no objection letter is sent out, then
10 proceed.

11 If that's all we're talking about then
12 that's fine, then I can vote on that, but I'm
13 just, it's the language is unclear to me.

14 CHAIRMAN DANNER: That was my
15 understanding. Is there a need to clarify that
16 language?

17 MR. GALE: No. The way we took it
18 was, it would be very similar to language we
19 developed for the 607 section. That's how I
20 interpret it.

21 MEMBER GOSMAN: Okay, but the state
22 notification provision remains in.

1 CHAIRMAN DANNER: Okay. All right.
2 Andy?

3 MEMBER DRAKE: I'd like to propose a
4 motion.

5 CHAIRMAN DANNER: All right. Wait a
6 minute, Sara's flag is still up. Oh, all right.
7 Now you may proceed.

8 MEMBER DRAKE: I don't want to violate
9 Robert's Rules of Order, but the proposed rule is
10 published in the federal registry in the draft
11 regulatory evaluation with regard to provision of
12 ICDA, SCCDA, requirements of guided wave
13 ultrasonic testing, and the passage of inline
14 inspection devices are technically feasible,
15 reasonable, cost effective and practicable if the
16 following changes are made.

17 Revise 192.923(b) and (c), 192.927 and
18 192.929 according to the recommendations by the
19 PHMSA staff at the meeting per PHMSA slides.
20 Revise the no objection process as recommended by
21 members at the GPAC meeting per the recommended
22 procedure under 192.607 and consideration,

1 considering the other recommendations made
2 regarding made regarding guided wave ultrasonic
3 testing process by Members Drake and Zamarin.

4 MEMBER HILL: Robert Hill, would like
5 to second that motion.

6 CHAIRMAN DANNER: Okay. We have a
7 motion and a second. Is there any additional
8 discussion on the motion? All right then, I'll
9 turn it over to Cameron to take the votes.

10 MR. SATTERTHWAITE: All right. And it
11 goes just straight, jump right into it. The
12 options are aye and nay or abstain. Andy Drake?

13 MEMBER DRAKE: Aye.

14 MR. SATTERTHWAITE: Chad Zamarin?

15 MEMBER ZAMARIN: Aye.

16 MR. SATTERTHWAITE: Cheryl Campbell?

17 MEMBER CAMPBELL: Aye.

18 MR. SATTERTHWAITE: David Danner?

19 CHAIRMAN DANNER: Aye.

20 MR. SATTERTHWAITE: Diane Burman? I
21 don't know if she's with us right now? I'll go
22 onto Mark Brownstein?

1 MEMBER BROWNSTEIN:: Aye.

2 MR. SATTERTHWAITE: Richard Worsinger?

3 MEMBER WORSINGER: Aye.

4 MR. SATTERTHWAITE: Richard Pevarski?

5 MEMBER PEVARSKI: Aye.

6 MR. SATTERTHWAITE: Robert Hill?

7 MEMBER HILL: Aye.

8 MR. SATTERTHWAITE: Ron Bradley?

9 MEMBER BRADLEY: Aye.

10 MR. SATTERTHWAITE: Sara Gosman?

11 MEMBER GOSMAN: Aye.

12 MR. SATTERTHWAITE: Steven Allen?

13 MEMBER ALLEN: Aye.

14 MR. SATTERTHWAITE: Terry Turpin?

15 MEMBER TURPIN: Aye.

16 MR. SATTERTHWAITE: It's unanimous.

17 It passes.

18 MEMBER BURMAN: I'm sorry, I was on

19 mute. I say aye.

20 MR. SATTERTHWAITE: Say again.

21 MEMBER BURMAN: I'm sorry. Aye.

22 MR. SATTERTHWAITE: Okay, thank you.

1 CHAIRMAN DANNER: Now it's unanimous.
2 Thank you, Commissioner Burman.

3 MR. SATTERTHWAITTE: Now it is
4 completely.

5 CHAIRMAN DANNER: Okay. So the motion
6 has passed. Thank you everybody. I'll turn it
7 back over to Alan now. He'll tell us where we go
8 from here.

9 MR. MAYBERRY: Thank you, Mr.
10 Chairman. Wow, what a way to end with a bang
11 here. Awesome. I think we over-achieved, we
12 definitely did, getting that last vote.

13 I just want to thank everyone. I
14 think the conversation is incredible. It's
15 really what, you know, I think part of what makes
16 this country so great and this process so great,
17 the dialogue we're able to have, the different
18 stakeholders on policies that really impact a lot
19 of Americans. So really appreciate that
20 conversation here. I find it very, very
21 invigorating actually.

22 But a couple things. Well, first up I

1 wanted to thank our Deputy Administrator, Drue
2 Pearce for sticking with us here until the very
3 end. Thank you, Drue.

4 And, I wanted to talk a bit about the
5 next steps. We are, as I had mentioned earlier
6 in my remarks about trying to, you know, move
7 with deliberate speed, you know, appropriate
8 speed to get to the end game, which I do find
9 that I see a light at the end of the tunnel.
10 We're making great progress.

11 So were anticipating and I think
12 you've seen a couple of dates out there. Next
13 related to March, we're looking at the 26th
14 through the 28th. Actually, looking at maybe
15 making that a three day meeting. Possibly
16 covering, you know hopefully we can get to a vote
17 on 624 and wrap up. Yes, 624, which you know
18 pretty meaty area that we had discussion on here.

19 And then perhaps on the third day we
20 would stage gathering line. And whether or not
21 that's full there or half day, I mean that can be
22 something we discuss. But I think we need two

1 full days just to close up 624 and maybe a third
2 day to add gathering. And that would be in
3 person. And then followed up by June 12th to the
4 14th as meeting pretty much dedicated to
5 gathering lines.

6 But before that, with the other topics
7 we came up and discussed here today related to
8 enhance assessments and some of the other
9 homework I think that we needed to provide, we
10 would propose a conference call in February time
11 frame to, you know, close the loop on the rest of
12 what we talked about here, but then also to
13 report back to you on some of the data that we
14 need to cover.

15 So I would throw that out to you. I
16 think you've already seen those two dates, but
17 then we were looking at that and another. I'm
18 really hopeful that, perhaps, we could wrap this
19 whole, I mean maybe it's wishful but you know
20 you've got to grasp towards something and think
21 positively in which I am very hopeful right now.
22 I feel pretty good about this that we could

1 possibly wrap up by June. That would be my hope.

2 Lastly, I wanted to thank, you know,
3 PHMSA staff. I know John had just mentioned Bob
4 and Sayler. You guys are phenomenal at the
5 controls over there. I really appreciate your
6 work here.

7 And the rest, Cameron, John, who's
8 kind of the running things from the reg program
9 standpoint. Steve and Chris are main presenters
10 on the rules, thank you so much. And of course
11 Cheryl, our Advisory Committee Manager, who
12 appreciate the effort. Let's give them a round
13 of applause. Takes a lot of work to put these
14 things on. Very much appreciate that.

15 MEMBER ZAMARIN: Hey, Alan?

16 MR. MAYBERRY: Yes.

17 MEMBER ZAMARIN: Can I just echo.
18 This meeting was by far, I think we were better
19 prepared. I don't know if the rest of the group
20 agrees, but the quality of the materials and
21 having them early, I think really helped us move
22 quickly through the meeting. And I just want to

1 commend the staff.

2 I know the team did a tremendous
3 amount of work. But I think one of the reasons
4 why we moved so quickly through these materials
5 was because we had them in advance. So I
6 appreciate the good work that was done in this
7 ready.

8 MR. MAYBERRY: Yes. I appreciate
9 that.

10 MEMBER ZAMARIN: Thank you, Alan.

11 MR. MAYBERRY: Yes, I think we're
12 getting there. We've made a lot of progress on
13 preparing the Committee Members. And, yes, I
14 agree and I've heard a lot of comments. Thanks,
15 Chad, too.

16 You know the feedback on how we could
17 improve things or suggestions either now or just
18 drop us a line. I don't know. Like a, you know
19 again welcome Ron. Ron first meeting here. I
20 appreciate your engagement here as well.

21 MEMBER BRADLEY: I'll come back.

22 MR. MAYBERRY: That's a good sign.

1 MEMBER BRADLEY: Yes. I just, I would
2 like PHMSA to work with the federal government on
3 providing coffee at these meetings.

4 MR. MAYBERRY: We have that on the
5 records. To do that. Thank you, I'll take that
6 into consideration. And then lastly, Cheryl had
7 a couple of housekeeping items and then I'll say
8 one last thing.

9 MEMBER CAMPBELL: Yes, I just wanted
10 to say a couple of things. There we go. I
11 wanted to mention, we did mention a couple of
12 times, you know we wanted some input on several
13 items.

14 So I wanted to say we've had some
15 conversations about where we should put these
16 comments. And we are recommending that you put
17 them both on the meeting page docket as well as
18 the rule making page docket. And we think that
19 way nothing will get lost.

20 Also I wanted to let you know, because
21 I had a couple comments about the rosters not
22 being updated. Our web site is currently under

1 construction or reconstruction, which ever one
2 you want to call it. And we will get those
3 things updated as soon as possible.

4 They are, however, in the package of
5 materials that were provided to the Members and
6 on the current meeting page, Number 127. You
7 have to download the Member Portfolio, as what
8 it's called and the updated rosters will be
9 there.

10 For Members, I did update your current
11 information. Hopefully I caught it all in the
12 midst of everything. And you bios and I will be
13 sending that back out. So if you could just help
14 me with any typos or any errors I might have
15 made, I appreciate it. I hate doing that to you.
16 I know how busy you are, but it's helpful.

17 So again, thank you everyone. Ron,
18 it's really been fun having you. You said you
19 were having a good time, so. Everybody have a
20 nice holiday.

21 MR. MAYBERRY: Lastly, I would just
22 like to thank the public participants. That's

1 been my problem the whole meeting here. Gosh.
2 No I just was thinking, you back behind me who
3 can't hear me for being here.

4 Very much appreciate your involvement
5 here as well and participation. I encourage you
6 to come back as well. With that I bid everyone
7 safe travels, back home. And happy holidays.
8 Take care.

9 CHAIRMAN DANNER: All right. Thank
10 you. Meeting is closed.

11 (Whereupon, the above-entitled matter
12 went off the record at 5:24 p.m.)

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In the matter of: Meeting of the Gas Pipeline
Advisory Committee

Before: Pipeline and Hazardous Materials Safety Admin.

Date: 12-15-17

Place: Arlington, VA

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