High Volume Excess Flow Valve Stakeholder Team Meeting Minutes

Date: June 23, 2009

Location: Crystal City Marriott, Crystal City, VA

Participants: Ralph Graeser, Pennsylvania Public Service Commission
Bruce Benson, Connecticut Department of Public Utility Control
Robert Henry, Arkansas Public Service Commission
John McGowan, UMAC
Dan Manion, Dresser Industries
Mike Zampogna, Dresser Industries
Greg Goble, RW Lyall & Co.
Philip Bennett, AGA
John Erickson, APGA
Bruce Paskett, NW Natural
Donald Lee Reynolds, NiSource
Jonathan Skolnik (Jack Faucett Associates)
Keith Coyle (PHMSA)
John Gale (PHMSA)
Mike Israni (PHMSA)
Steve Stout (Cycla Corp.)
John Gawronski (Cycla Corp.)
Veronica Fitzgerald (Cycla Corp.)

NOTE: Representatives of the National Transportation Safety Board (NTSB), the National Association of State Fire Marshalls (NASFM), and first responder organizations were unable to attend this stakeholder meeting. DOT will provide future opportunities for these organizations to provide their input and perspective and will actively solicit their views.

Purpose: Gather information and discuss issues concerning the use of excess flow valves (EFVs) on service lines for multi-family dwellings, commercial buildings, and industrial facilities, (i.e., those service lines supplying customers other than single family residences (SFR)).

Agenda: See Appendix A

Background:
In 2001, the National Transportation Safety Board (NTSB) issued a recommendation (P-01-2) that DOT should:

> *Require that excess flow valves be installed in all new and renewed gas service lines, regardless of a customer's classification, when the operating conditions are compatible with readily available valves.*

Since 2001, much has been accomplished to implement this recommendation for single family residential service. Use of EFVs in SFR applications have been mandated by Congress in the PIPES Act of 2006. DOT is in the process of codifying this requirement in the DIMP rulemaking, which is anticipated to be promulgated in 2009.
However, the use of EFVs in non-SFR applications presents unique challenges. DOT is now addressing the feasibility of requiring EFVs in other service classifications (in addition to SFR). The first step is to fully understand the difficulties, issues, costs, and risks associated with the use of EFVs in non-SFR applications. This stakeholder meeting is the first step in soliciting such input.

Presentations:
Various stakeholders presented prepared remarks which included their perspective on the use of excess flow valves in non-SFR applications. The following persons shared their perspective. The slides/materials presented are posted online at http://primis.phmsa.dot.gov/hvefv/index.htm .

Regulatory Background and Data Analysis
Mike Israni (PHMSA)

NAPSR Perspective
Ralph Graeser, Pennsylvania Public Service Commission

EFV Manufacturer's Perspective
John McGowan, UMAC
Dan Manion, Dresser Industries
Greg Goble, RW Lyall & Co.

Industry Perspective
Philip Bennett, AGA
John Erickson, APGA
Bruce Paskett, NW Natural
Donald Lee Reynolds, NiSource

Discussion:
The task team discussed, in general terms, the background and history of this issue, technical feasibility, potential issues, costs, and other considerations which should be accounted for in dealing with this issue.

Conclusions:
The most important messages communicated to DOT by the stakeholder team were:

1. EFVs are currently commercially available to handle loads larger than typical single family home, up to approximately 5,500 SCFH.
2. The KEY ISSUE is the dynamic nature of customer load changes over time, which could result in the need to change EFV in the future. If the EFVs are "right sized" for current load, future load

growth could result in spurious EFV closure under non-accident loads, causing interruption in service and requiring that the EFVs be replaced. Such replacement could be costly and introduces its own risks and safety hazards due to the excavation and (potentially) line replacement. If, however, the EFVs are oversized in anticipation of load growth, they might not be effective (might not close) in case of a line break.

3. DOT should consider that recent initiatives such as DIMP and damage prevention legislation should reduce number of incidents for which EFV mitigation would be effective.
4. A number of potential unintended consequences in applying EFVs in non-SFR applications should be carefully considered (e.g., mandatory EFV driving operators to install larger lines in anticipation of future load increases, which increases cost and could increase consequences of accidents)
5. It is premature to attempt an industry-wide survey related to non-single family EFV. The industry simply does not have enough experience and data to provide meaningful survey data. Industry should be allowed time to implement DIMP and gain experience with considering EFVs to reduce risk in case-by-case situations before a survey is undertaken.
6. Participants did not know of any foreign country having regulations mandating large volume EFVs or having used them.
7. Existing standards require that EFV have a maximum inlet pressure of at least 125 psig.

APPENDIX A

Large Excess Flow Valve Team Meeting
Agenda
June 23, 2009

Tuesday, June 23		
8:30 am	*Welcome and Introduction*	Mike Israni, *PHMSA*
8:45 am	*History: NTSB EFV Recommendations*	Mike Israni, *PHMSA*
9:00 am	*Background Data* • *Gas Service Subject to P-01-2* • *Incident Data* • *NRRI Survey Data*	Mike Israni, *PHMSA*
10:00 am	*Break*	
10:15 pm	*EFV Manufacturer's Perspective*	John McGowan, *UMAC* Dan Manion, *Dresser* Greg Goble, *RW Lyall & Co.*
11:00 pm	*Industry Perspective*	Phil Bennett, AGA John Erickson, *APGA* Bruce Paskett, *NW Natural* Donald Lee Reynolds, *NiSource*
Noon	*Lunch*	
1:15 pm	*Discussion Session:* • *Technical Challenges*	[Moderator] Mike Israni, *PHMSA*
2:15 pm	*Discussion Session:* • *Performance Standards*	[Moderator] Mike Israni, *PHMSA*
3:00 pm	*Break*	
3:15 pm	*Discussion Session:* • *Performance Metrics and Data*	[Moderator] Mike Israni, *PHMSA*
4:00 pm	*Discussion Session:* • *Cost of Implementation*	[Moderator] Mike Israni, *PHMSA*
4:45 pm	*Summary and Next Steps*	Mike Israni, *PHMSA*
5:00 pm	*Adjourn*	