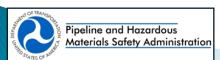
WELCOME

LARGE EFV TEAM

MIKE ISRANI

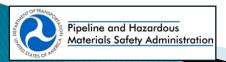
SENIOR TECHNICAL ADVISOR MANAGER: NATIONAL STANDARDS PHMSA

June 23, 2009



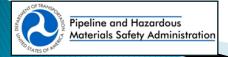
WHY ARE WE HERE?

- Consider NTSB Recommendation P-01-2
 - > Forum for stakeholder views
 - Share current EFV technology
 - Identify customers that will be affected
 - > Review incidents subject to mitigation
 - Review EFV utilization data
 - Discuss performance standards for large EFVs



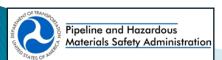
ORGANIZATIONS REPRESENTED

- Pipeline Regulatory Agencies
 - > PHMSA OPS
 - > NAPSR



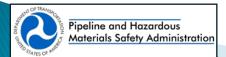
ORGANIZATIONS REPRESENTED

- Public and Municipal Utilities
 - > AGA
 - > APGA
- Vendors
 - > UMAC
 - > Dresser
 - > RW Lyall & Company



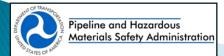
AGENDA OVERVIEW

MIKE ISRANI PHMSA



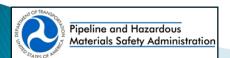
BACKGROUND

MIKE ISRANI PHMSA



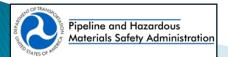
BACKGROUND

- ▶ PHMSA's role
 - Assure that pipelines are safe, reliable, and responsive to environmental issues
- ▶ This team's role
 - Provide input to inform PHMSA's response to NTSB Recommendation P-01-2



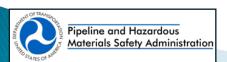
BACKGROUND

- PHMSA's approach
 - > Assure opportunity for input from stakeholders
 - > Data driven
 - > Cost effective



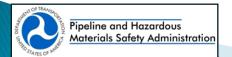
PHMSA'S OBJECTIVES FOR TODAY'S MEETING

- Receive input from participating stakeholders
- Identify
 - ➤ Technical issues applicable to EFVs in services other than single unit residences
 - Issues that would need to be addressed in EFV performance standards
 - Additional data that would better inform the approach for addressing P-01-2



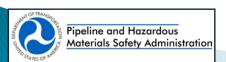
EFV REGULATIONS PRIOR TO PIPES ACT OF 2006

- Rules effective February 3, 1999 regulated EFVs installed on single unit residence service lines
 - > 49 CFR 192.381 Performance Criteria
 - > 49 CFR 192.383 EFV customer notification



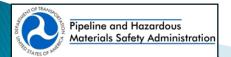
EFV INSTALLATIONS PRIOR TO PIPES ACT OF 2006

- ▶ EFVs installed on 7% of respondent services
- ▶ 40% of gas operators had zero EFV installations
- ▶ 69% of operators installed EFV only if requested by customer
- < 2% of customers requested EFV installation</p>
- Within individual states gas operators had dissimilar installation policies



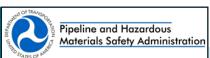
PIPES ACT OF 2006

Section 9 mandated that PHMSA require EFV installation on new and replacement single family residential service lines operating at ≥10 psig continuously throughout the year



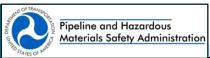
PIPES ACT OF 2006

- LPG and master meter operators excluded
- Exceptions to the rule: EFV not required
 - ➤ If operator has prior experience with gas contaminants that would cause EFV to malfunction
 - If EFV would result in loss of service or interfere with maintenance activities
 - If EFV meeting performance standards not commercially available



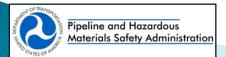
IMPLEMENTATION OF PIPES ACT of 2006

- Advisory Bulletin ADB-08-04
 - Advised gas distribution operators that EFV mandate went into effect June 1, 2008
- NPRM for DIMP
 - Proposed repeal of 49 CFR 192.383, EFV notification requirement
 - Proposed 49 CFR Section 192.1011 which documents EFV requirements of PIPES Act
 - Requires operators of natural gas service lines to report annually the number of EFVs installed



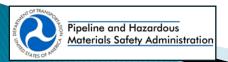
NTSB RECOMMENDATION P-01-2

MIKE ISRANI PHMSA

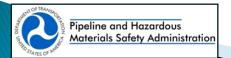


NATIONAL TRANSPORTATION SAFETY BOARD

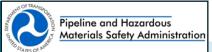
The National Transportation Safety Board investigates serious pipeline accidents, including those that occur on gas distribution systems. To improve gas distribution safety, NTSB has recommended the use of EFVs in all new construction and replacement gas distribution service lines.



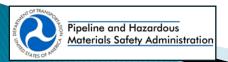
- NTSB advocated use of EFVs on
 - Service lines to schools and other buildings in which large numbers of people gather
 - > New and renewed residential service lines



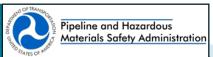
- ▶ 1990's
 - ➤ Use of EFVs on 1990 NTSB list of *Most Wanted*Safety Improvements
 - September 26, 1990 NTSB Recommendation P-90-12 issued. Required installation of EFVs on new and renewed single family residential services where conditions permitted
 - ➤ September 28, 1995 NTSB closed P-90-12 with designation *Closed-Unacceptable Action*



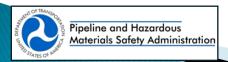
- ▶ 1990's
 - March 6, 1996 2 recommendations issued
 - P-96-2 to RSPA All gas customers should be notified that EFV available if conditions permitted
 - P-96-3 to US Governors Gas distribution operators required to install EFVs in all new or replaced services where conditions permitted



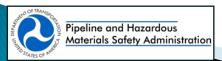
- ▶ 1990's February 3, 1998 RSPA issued EFV final rule
 - ➤ Mandated installation of EFVs on new or replaced single family residence services expected to operate continuously at ≥10 psig or
 - Notification to single family residence customers of benefits and availability of EFV with installation provided if customer paid



- ▶ 1990's
 - October 6, 1998 NTSB closed P-96-2 with designation *Closed-Unacceptable Action*
- ▶ 2000's
 - May 3, 2000 NTSB removed EFV recommendations from Most Wanted List
 - ➤ October 3, 2000 NTSB closed P-96-3 with designation Closed-Acceptable Alternate Action

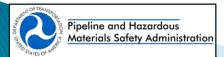


- ▶ 2000's
 - June 22, 2001
 - NTSB issued Recommendation P-01-2
 - PHMSA should require operators to install EFVs on all new and replacement service lines
 - All customer classifications with suitable gas service conditions included



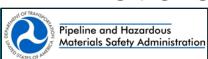
BACKGROUND DATA

MIKE ISRANI PHMSA

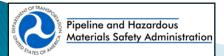


DATA ANALYSIS GOALS

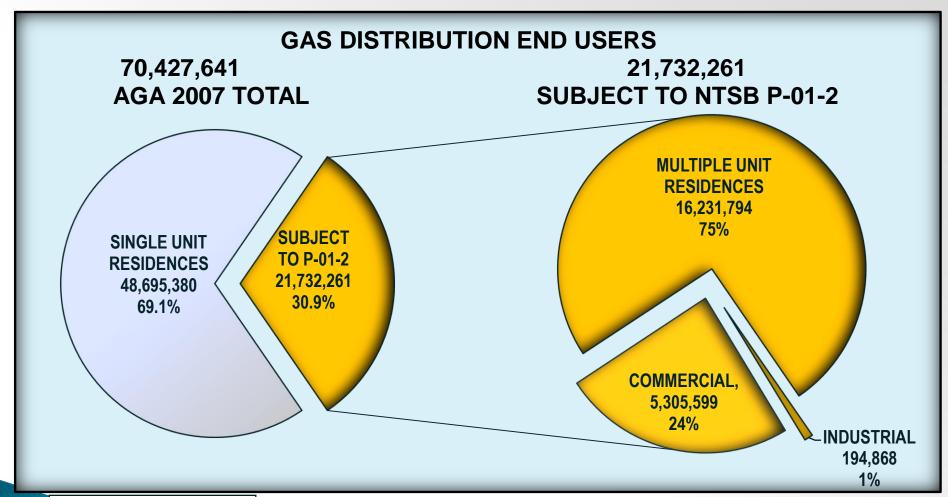
- Identify the in-place service line population subject to NTSB P-01-2
- Identify incidents that could have been mitigated by EFVs
- Review NRRI survey of EFV utilization
 - How many EFVs are being installed?
 - > Are EFVs mitigating incidents?
 - > Are there performance issues?
 - > What are the costs?

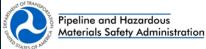


IDENTIFICATION OF IN-PLACE GAS SERVICES SUBJECT TO NTSB RECOMMENDATION P-01-2

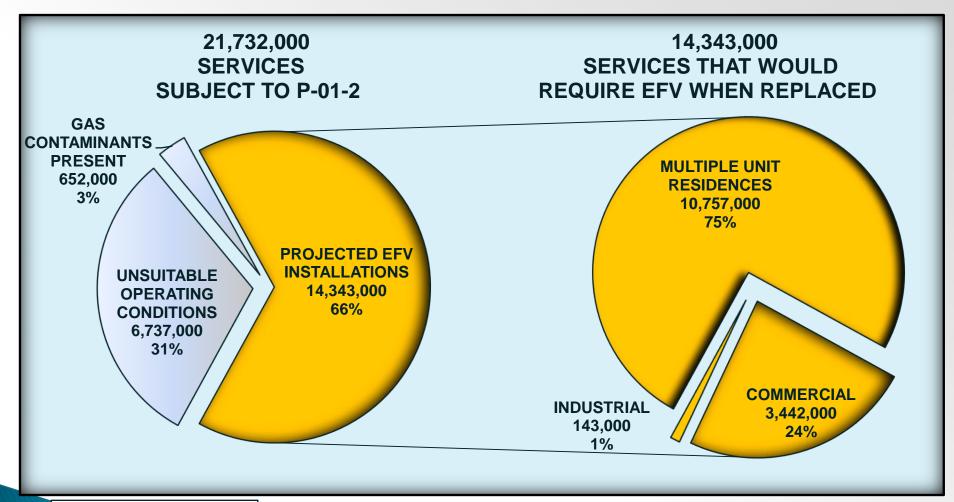


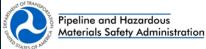
IN PLACE GAS SERVICES SUBJECT TO NTSB RECOMMENDATION



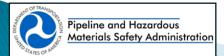


IN PLACE GAS SERVICES SUBJECT TO NTSB RECOMMENDATION



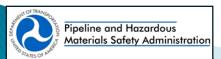


INCIDENT CANDIDATES FOR EFV MITIGATION

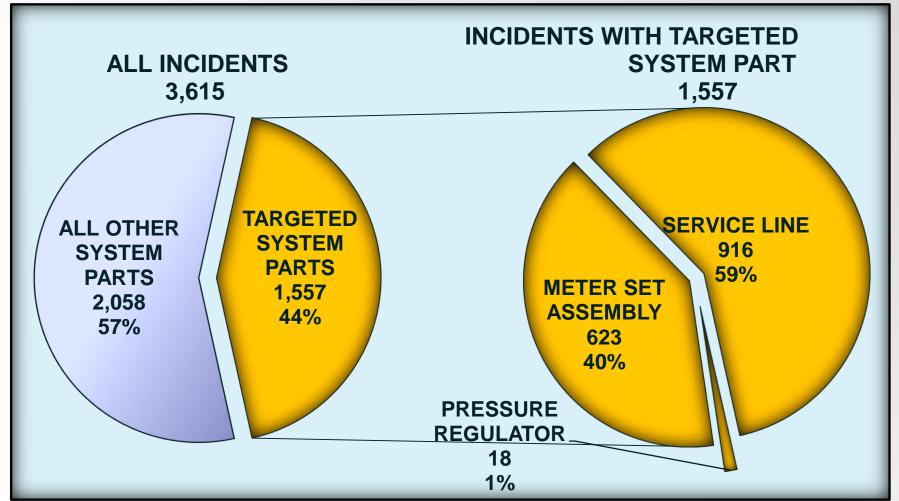


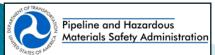
INCIDENT CANDIDATES FOR EFV MITIGATION

- Applied **filters** to 1984-2009 data in PHMSA gas distribution incident database. Identified incidents that occurred on lines meeting the following criteria:
 - Targeted system parts
 Service line, meter assembly set, pressure regulator
 - Targeted cause
 Excavation damage, natural force, or outside force
 - Targeted system pressure
 5 ≤ P < 10 psig, or P ≥ 10 psig</p>
 - Non-single family residential service Commercial, industrial, multi-family residential

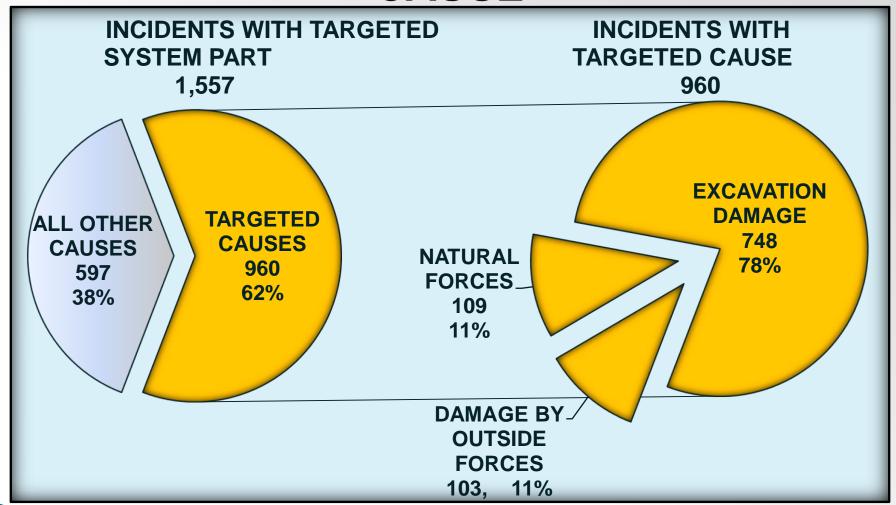


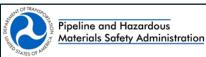
IDENTIFICATION OF CANDIDATE INCIDENTS SYSTEM PART



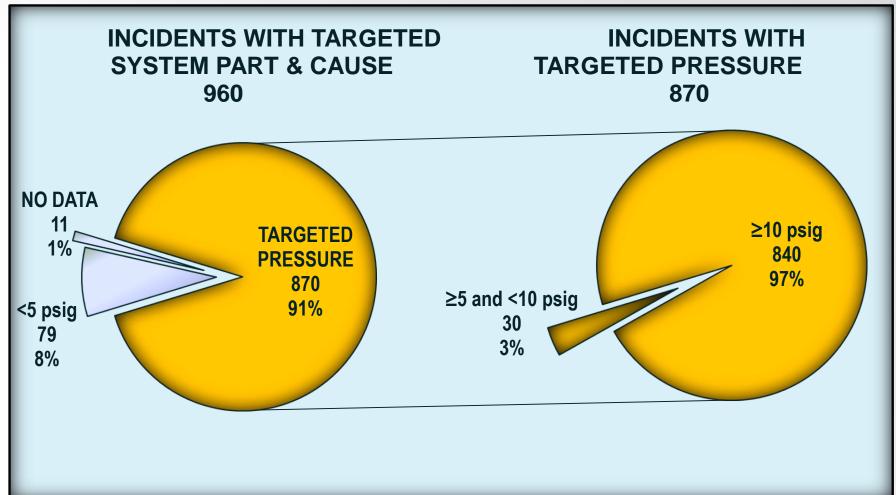


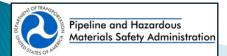
IDENTIFICATION OF CANDIDATE INCIDENTS CAUSE



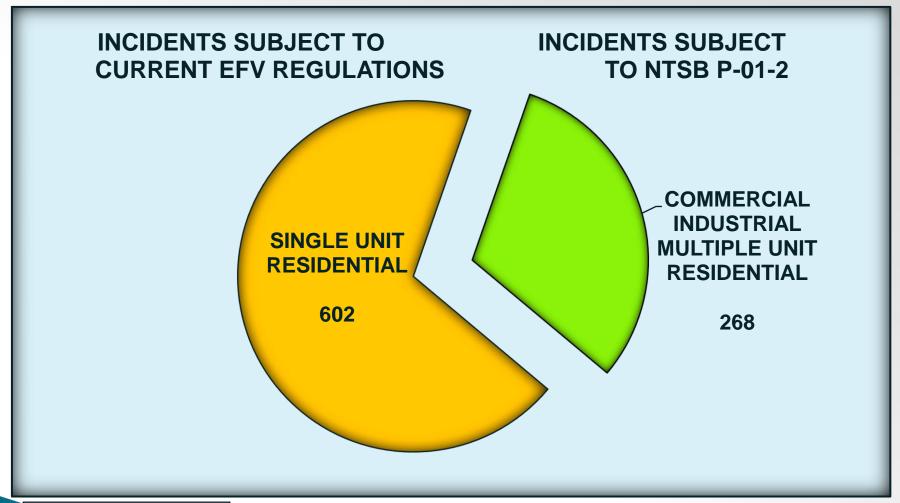


IDENTIFICATION OF CANDIDATE INCIDENTS LINE PRESSURE

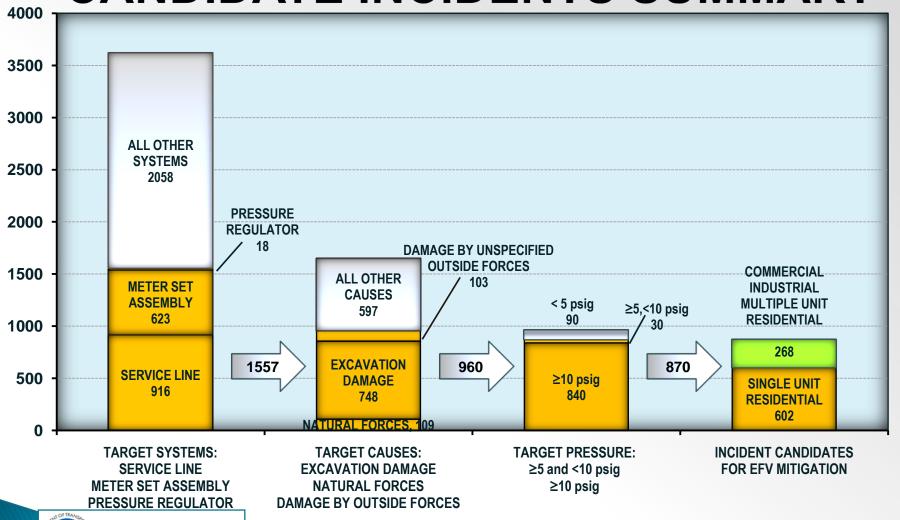




EFV MITIGATION CANDIDATE INCIDENTS



EFV MITIGATION CANDIDATE INCIDENTS SUMMARY

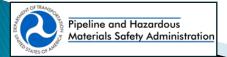


Pipeline and Hazardous

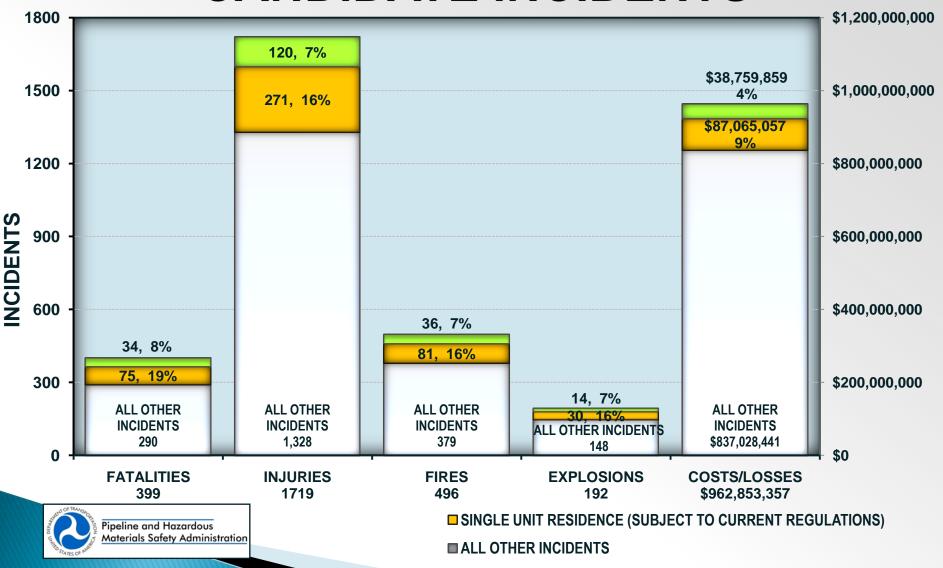
Materials Safety Administration

CANDIDATE INCIDENTS CONSEQUENCES

- Breakdown of all distribution incidents in PHMSA incident database for each of the following:
 - > Fatalities
 - > Injuries
 - > Fires
 - > Explosions
 - > Costs/Losses



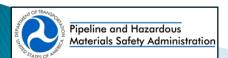
CONSEQUENCES CANDIDATE INCIDENTS



NATIONAL REGULATORY RESEARCH INSTITUTE

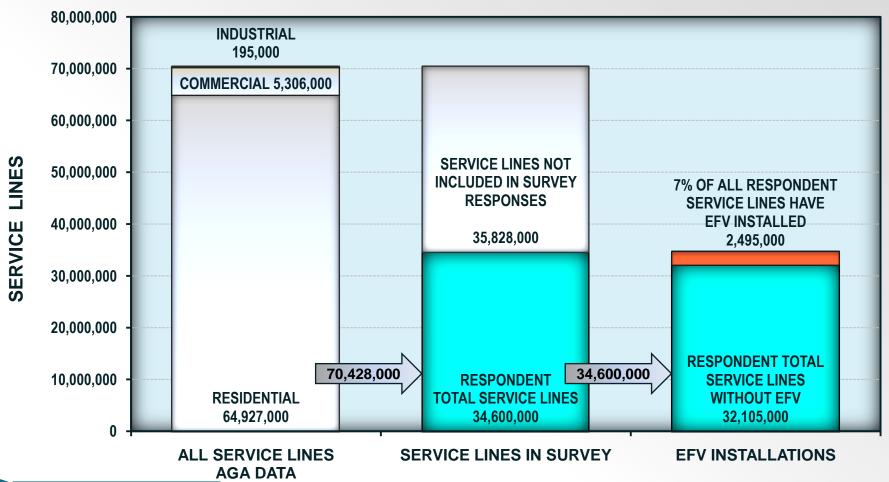
SURVEY ON EXCESS FLOW VALVES INSTALLATIONS, COST, OPERATING PERFORMANCE, AND GAS OPERATOR POLICY

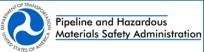
MARCH 2007



NRRI SURVEY

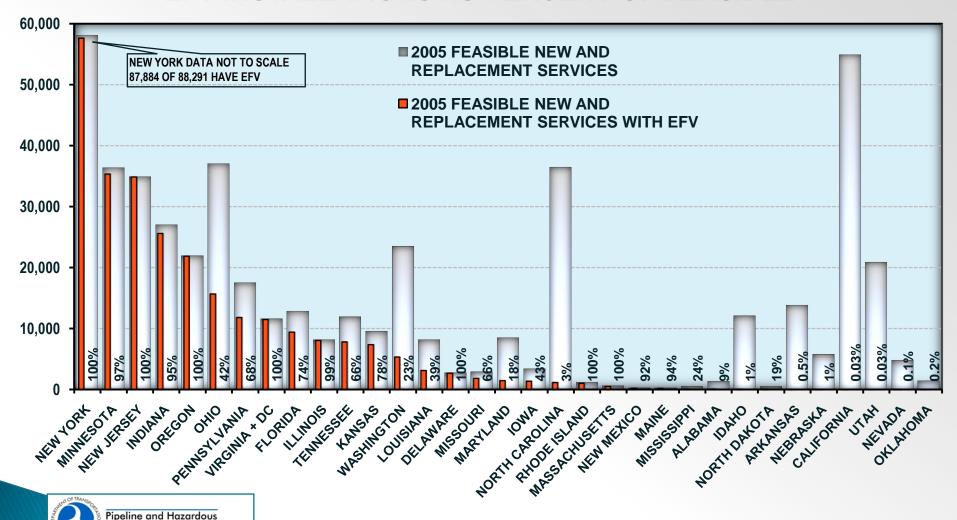
EFV INSTALLATIONS REPORTED FOR 2005





NRRI SURVEY

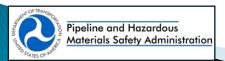
2005 EFV FEASIBLE NEW AND REPLACEMENT SERVICES EFV INSTALLATIONS AS PERCENT OF FEASIBLE



Materials Safety Administration

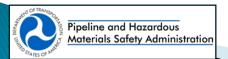
NRRI SURVEY 2005 EFV ACTUATIONS

- Operators reported 1,108 successful gas flow terminations in response to a severe line break
 - > Actuations as % of installed EFVs was .044%
- EFVs seldom close inadvertently
 - > False closures as % of EFVs was 0.0089%
- Failure to close occurred infrequently
 - Of all EFVs on gas lines that ruptured, 2% failed to function properly
 - > Of the 497 respondents, 3 experienced failed closures



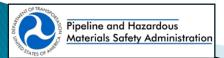
NRRI SURVEY SUMMARY AND CONCLUSIONS

- ▶ Prior to PIPES Act of 2006
 - > EFVs were installed on 7% of service lines
 - > 96% of EFV installed voluntarily by operator
 - > 40% of gas operators had zero EFVs installed
- ▶ In 2005, 1108 successful EFV actuations
- False closures and failures occur infrequently



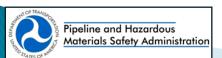
NAPSR PERSPECTIVE

>>> RALPH GRAESER PENNSYLVANIA PSC



EFV MANUFACTURER'S PERSPECTIVE

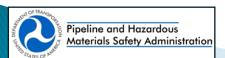
- JOHN McGOWAN UMAC
- DAN MANION DRESSER
- Market Gobberg Gobberg R.W. LYALL & COMPANY



INDUSTRY PERSPECTIVE

PHIL BENNETT
AGA

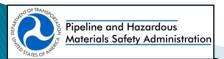
JOHN ERICKSON APGA



INDUSTRY PERSPECTIVE

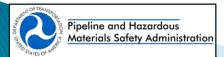
BRUCE PASKETT
NW Natural

DONALD LEE REYNOLDS
NiSource



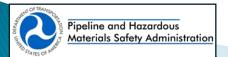
DISCUSSION

MIKE ISRANI PHMSA

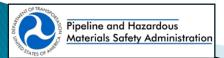


DISCUSSION

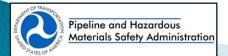
- Topics we have thought about and would like to discuss with you
 - > Technical Challenges
 - > Performance Standards
 - Performance Metrics and Data
 - Cost of Implementation



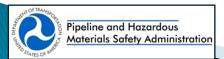
- Gas usage patterns
- Snaploads
- Gas quality
- System configuration
- Temperature ranges
- Pressure ratings
- Other



- On which service types will EFVs be most effective?
 - Multiple unit residential
 - > Commercial
 - > Industrial

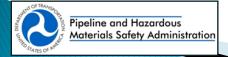


- Design and operation
 - > Line diameter
 - Availability of suitable EFV
 - FFVB or EFVNB
 - Are smart EFVs being developed?
 - Accommodate fluctuating loads
 - Accessibility in case of failure



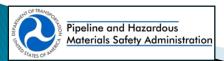
Other Issues?

Summary



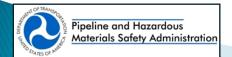
49 CFR 192.381 EFV PERFORMANCE STANDARDS

- Prescribes minimum requirements for
 - > EFVB and EFVNB for single unit residences
 - > Design, qualification, and installation of EFV
 - Locating and marking site of EFV
- Identifies conditions that preclude use of EFV
 - ➤ Inadequate line pressure
 - Contaminants in gas stream
 - > Interference with operation and/or maintenance



EFV PERFORMANCE SPECS

- EFV performance parameters published by manufacturer
 - > UMAC
 - > DRESSER
 - > R.W. LYALL & COMPANY



NATIONAL CONSENSUS STANDARDS

Performance criteria and test methods

> ASTM F 2138 Standard Specification for

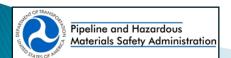
EFVs for Natural Gas Service

> ASTM F 1802 Standard Test Method for

Performance Testing of EFV

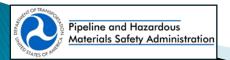
> MSS SP-115 EFV, 11/4 NPS and Smaller, for

Fuel Gas Service



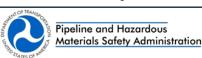
ASTM F 2138 STANDARD SPECIFICATION FOR EFVS FOR NATURAL GAS SERVICE

- EFVB and EFVNB subject to this standard
 - > 1/2" CTS to 2" IPS
 - ➤ Max inlet pressure spec must be ≥125 psig
 - > Temperature range of -20 to 140° F
- Requires
 - Sample tests to establish performance parameters
 - > 100% production testing of all EFVs



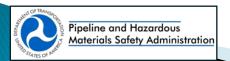
ASTM F 1802 STANDARD TEST METHOD FOR PERFORMANCE TESTING OF EFV

- Residential and small commercial
 - > 1/2" CTS and 11/4" IPS
 - ➤ Pressure rating of ≤ 125 psig
 - > Temperature range of 0° to 100° F
- Performance characteristics tested
 - Flow at trip point
 - Pressure drop across EFV
 - Bypass flow rate of EFVB
 - Leak rate of EFVNB after trip
 - Verification that EFV can be reset
 - Compensation for contaminants in gas



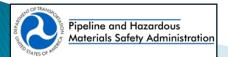
MSS SP-115 EFV, 11/4" NPS AND SMALLER FOR FUEL GAS SERVICE

- Applies to EFVBs and EFVNBs with
 - Minimum design inlet pressure of 5 psig
 - > Temperature range of -20° to 140° F
- Requires 100% production testing
- Incorporates ASTM F 1802 when testing high pressure EFV (≥ 5 psig)
- Requires identification markings on EFV



AMENDMENT OF PERFORMANCE STANDARDS

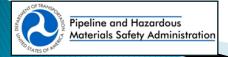
- Revise current standards?
- Develop new standards?
- Other?



AMENDMENT OF PERFORMANCE STANDARDS

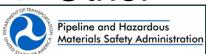
Open forum for discussion

Summary



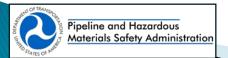
PERFORMANCE METRICS AND DATA

- Is there a need for new survey? e.g. to support a cost benefit analysis.
- Data that survey could capture
 - Number of EFV installations
 - > Service type (residence, commercial, industrial)
 - Line size and pressure
 - > Installation cost
 - Number and circumstances of in-service actuations; false closures; or failures to close
 - > Other



PERFORMANCE METRICS AND DATA

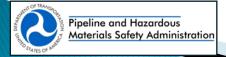
- Incident data
 - > EFV installed on gas line or not?
 - > EFVB or EFVNB?
 - ➤ Did EFV perform as expected?
 - ➤ Did EFV mitigate consequences?
 - > Other



PERFORMANCE METRICS AND DATA DISCUSSION

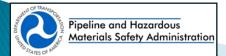
Open forum

Summary



COST OF IMPLEMENTATION

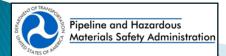
- Cost impact of NTSB recommendation
 - Modification of standard designs
 - Materials and installation
 - > Operations and maintenance
 - > Documentation and reporting
 - > Other



COST OF IMPLEMENTATION

Open forum

Summary



MEETING SUMMARY/NEXT STEPS

MIKE ISRANI PHMSA

