

Meeting Questions and Answers:

Subject: Webinar: New PHMSA Gas Distribution Annual Report and Mechanical Fitting Failure Report

Start Time: Wednesday, January 12, 2011 1:30:00 PM GMT-5:0

Q&A #1. Kristen **Asked:** Are excavation damages to mechanical fittings to be counted on this form? Are only below-ground fittings to be considered?

PHMSA Response (MIKE): Yes, reporting should include excavation damage and applies to both above-ground and below ground fittings.

Q&A #2. William **Asked:** Will the state programs be given access to the data from the annual reports that are submitted electronically? If so, when, and in what format?

PHMSA Response (Sara): For now, the States can access the reports via the Pipeline Data Mart in mid April in either PDF or Excel. However, operators can download a draft or submitted report in PDF or Excel and email it to the States.

Q&A #3. Leo **Asked:** Has PHMSA received OMB approval of the annual report for for distribution yet? If not, when do you expect such approval? If you don't get approval before the March 15 due date, should distribution companies use the old form?

PHMSA Response (Roger): PHMSA has received OMB approval. Reports are due March 15.

Q&A #4. Roy **Asked:** when will there be a form to report mech failures for entire year (ref. to part F)?

PHMSA Response (Sara): The mechanical fitting failure report form is available now at <https://portal.phmsa.dot.gov/pipeline> or from the <https://opsweb.phmsa.dot.gov/cfdocs/opsapps/pipes/main.cfm>

Q&A #5. Michael Asked: How are we defining 'hazardous' in part c?

PHMSA RESPONSE (MIKE): The definition for hazardous leaks was based on GPTC guidance and discussed in the DIMP final rule along with the instructions for the annual report. A “hazardous leak” means a leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous. A “hazardous leak” which occurs aboveground or belowground is a leak and must be reported.

Q&A #6. eric Asked: Will there be a online video of this presentaton posted later?

PHMSA Response (Sara): Yes, it will be accessible at <http://phmsa.dot.gov/pipeline/library> Due to the requirement to add close caption it takes time to get posted but is available now.

Q&A #7. Dan Asked: what about clamps over existing leaks

PHMSA RESPONSE (MIKE): Clamps, we are not considering them as Mechanical fittings for reporting purposes. We are only focusing on compression type fittings.

Q&A #8. Daniel Asked: For EFV info. Does the system number reflect what was installed in 2010 or total in system including previous years?

PHMSA RESPONSE (MIKE): We are asking for 2 numbers regarding EFVs. The first number is for the total number of EFVs installed for the calendar year on single family residences. The second number is for an estimate of the total number of EFVs installed in the entire system up until the end of the reported calendar year.

Q&A #9. Joe Asked: Are loose bolts on a fitting considered a failure?

PHMSA RESPONSE (MIKE): No. Loose bolts are not considered leaks/failures.

FOLLOW-UP

Joe Changes Question To: Are loose bolts on a fitting resulting in a leak considered a failure? **Mike,** No. Instruction for Forms clearly indicate that loose bolts or threads that

can be re-tightened or greased, etc. are not considered coupling failures resulting in leaks that need reporting. However, if the material or design is defective and bolts, nut, or threads can Not be tightened to prevent leak then it is a defective fitting and it should be reported.

Q&A #10. eric Asked: Will there be a online video of this presentation posted later?

PHMSA Response (Sara): Yes, due to the requirement to add close caption it takes some time to get posted. It will be available at <http://phmsa.dot.gov/pipeline/library>

Q&A #11. Tyler Asked: Please define failure with respect to mechanical fitting failure.

PHMSA RESPONSE (MIKE): Failures apply to leaks through the seam, body, or via pull outs. They can be results of construction defects, installation defects, design defect, material defects. More details are found in question 15 for the form.

FOLLOW-UP:

Tyler Changes Question To: Please define failure with respect to mechanical fitting failure. **Mike** Failure in coupling or pipes joining the coupling results in a hazardous leak as defined in the DIMP rule.

Q&A #12. Paul Asked: Are corrosion leaks on couplings considered as compression coupling failures?

PHMSA RESPONSE (MIKE): Yes, if the corrosion resulted in a leak through the body of the mechanical fitting.

Q&A #13. Jerome Asked: Will the distribution incident reporting instructions be updated to eliminate the reporting of fire first?

PHMSA Response (Roger): PHMSA will issue new instructions that reflect the recent change. Operators now report “fire first” type of events only when \$50,000 damage happens to the operator’s facilities.

Q&A #14. Ben **Asked:** Should we consider anodeless risers (which has a manufactured compression between plastic/steel) as a mechanical fitting?

PHMSA RESPONSE (MIKE): Yes, under Item # 4 under Part C.

Q&A #15. David **Asked:** Is data import "all or nothing" or can you selectively import.

PHMSA Response (Sara): Currently there is not an option to import your data. If the volume of mechanical fitting failures is high, PHMSA will implement a mechanism to allow operators to upload information rather than completing a form for each failure.

Q&A #16. Gert **Asked:** Once an individual is registered and uses the portal, how is their access removed in the future if that individual no longer needs the portal access?

Q&A #17. William **Asked:** Are flanges considered mechanical fittings for the purpose of reporting? **Mike:** Flanges by themselves are not mechanical fittings per say, but if flanges are part of a compression type fitting (e.g. bolted mechanical fittings have flanges and also have elastomers or other compression material), then yes, its failure is to be reported.

Q&A #18. Pam **Asked:** Can an OPID have multiple User IDs?

PHMSA Response (Sara): Yes, one OPID may be associated with several user IDs, and one user ID can be associated to several OPIDs. However, the registration process is based on an individual, so each individual will need to register and associate that OPID to their user ID.

Q&A #19. Steven **Asked:** are we reporting failed fittings for any class of failure or just emergencies. (Steve Lipka - NSG) **Mike:** Only those that result in a hazardous leak

as defined in the rule. GPTC guidance defines hazardous leaks as Category 1 (or grade A) leaks.

Q&A #20. Dave **Asked:** Can you create multiple users for a single OPID?

PHMSA Response (Sara): One OPID may be associated with several user IDs; however, the registration process is based on an individual, so each individual will need to register and associate that OPID to their user ID.

Q&A #21. Mark **Asked:** Are mechanical failure reports also submitted via Turbo Tax method? This could be cumbersome if many failures. Will you offer upload of form?

PHMSA Response (Sara): Currently there is not an option to import your data. If the volume of mechanical fitting failures is high, PHMSA will implement a mechanism to allow operators to upload information rather than completing a form for each failure.

Q&A #22. Brian **Asked:** Does the Portal timeout after a certain amount of time of inactivity.

PHMSA Response (Sara): Yes, the portal will timeout after 45 minutes of inactivity. If you need to come back to the application, please save the report you were working on. You can finish that report by going under the “Saved Reports” section under “View Reports”.

Q&A #23. Ray **Asked:** Are thread fittings included

PHMSA RESPONSE (MIKE): If you are referring to all mechanical threaded fitting with no elastomers or compression material in it then it is not covered. But Nut follower type fittings have threads, as well as elastomers, and those fittings are covered.

Q&A #24. Paulette **Asked:** Is it possible to print the pages you just walked us thru?

PHMSA Response (Sara): A complete guide to register to the portal and how to complete a Gas Distribution Annual report is available at <https://portal.phmsa.dot.gov/pipeline>

Q&A #25. Mary **Asked:** I had no audio for this presentation, can you schedule it again?

PHMSA Response (Sara): No, but the video is available at <http://phmsa.dot.gov/pipeline/library>

Q&A #26. Brian **Asked:** Can more than one person from an operator register? For example, if one person submits the annual report and one submits the mechanical fitting failure?

PHMSA Response (Sara): One OPID may be associated with several user IDs; however, the registration process is based on an individual, so each individual will need to register and associate that OPID to their user ID. Then anyone from an operator can submit any report necessary. One user can even start a report, save it, and another user can finish it by finding it under the Saved Reports section and modifying the draft report.

Q&A #27. Brian **Asked:** Can mechanical ftgs be downloaded from excel spreadsheets into your system or do they have to be inputted individually?

PHMSA Response (Sara): Currently there is not an option to upload your data. If the volume of mechanical fitting failures is high, PHMSA will implement a mechanism to allow operators to upload information rather than completing a form for each failure.

Q&A #28. Tom **Asked:** If someone else submitted the annual transmission report last year, will I be able to auto-populate portions of the annual transmission report for this year, or will I have to start from scratch?

PHMSA Response (Sara): Gas Transmission Annual Reports cannot be pre-populated with 2009 information due to the change in reporting requirements. In the out years, gas transmission reports can be pre-populated with previous year data regardless of who submitted that report.

Q&A #29. Steven **Changes Question To:** are we reporting failed fittings for any class of failure or just emergencies. (Steve Lipka - NSG) **Mike:** Failures that result in a hazardous leak as defined in the rule. GPTC guidance defines hazardous leaks as Category 1 (or grade A) leaks.

Q&A #30.

Q&A #31. William **Asked:** RE: The Mechanical Fitting reporting. The report page for this reporting can only accomodate one record at a time, if I'm not mistaken. What will be due in March, 2012? PHMSA will already have all of the data, provided it is submitted throughout the year.

PHMSA Response (Sara): Yes, each failure is reported separately to PHMSA. An operator has until 3/15/2012 to report all failures that occurred in 2011. If you have reported all failures that occurred in 2011 prior to 3/15/2012, then nothing is due on 3/15/2012.

Q&A #32. Ben **Asked:** Would we need to report Normax fittings? These fittings have a rubber compression with no gripper used on low pressure Cast Iron and Steel.

PHMSA RESPONSE (MIKE): Yes. If it does not fall under Nut Follower, Bolted or Stab type mechanical fittings, place it under "Other Compression Types."

Q&A #33. Connors **Changes Question To:** We would like some clarification on how to fill out the Leaks section. Specifically what consitiutes a Hazardous leak? Are these to be included as subset of the Total Leaks?

PHMSA RESPONSE (MIKE) and Roger: Basically, "Hazardous Leak" is defined in the instructions. "Hazardous Leaks" are subsets of "Total Leaks" and should be included in the count for "Total Leaks".

Q&A #34. Tim **Asked:** For agents assisting multiple operators, you stated that we would have to create a username and password for each, but then you stated that once logged in that those assisting multiple operators would be able to select the operator from a pick list. Did I understand this correctly or will someone assisting multiple operators create the one username and password?

PHMSA Response (Sara): The registration process is based on an individual, so you will create a user ID and then can associate as many OP IDs as needed to your account. This can be done during the registration process by entering the OPID and associated ODES PIN, then clicking "Add Another OPID" or after the registration process. Once you log into the portal, go to account management and you will be able to add OPIDs to your user ID.

Q&A #35. Danny **Asked:** Early on you mentioned that the performance measures and EFVs installed are to be reported by 3/15/2011. Are these supposed to be reported on the Annual Report? And is that submittal date extended to June 15, 2011?

PHMSA RESPONSE (MIKE). The performance measures and EFV information should be reported in the Gas Distribution Annual report that is to be submitted by March 15, 2011.

Q&A #36. Richard **Asked:** Could there be a way to upload data, especially for the mechanical fittings, instead of manually entering the report information. If we use a grass-roots method to collect the data, our computer systems could format the data to map into the DOT database. Thanks.

PHMSA Response (Sara): Currently there is not an option to upload your data. If the volume of mechanical fitting failures is high, PHMSA will implement a mechanism to allow operators to upload information rather than completing a form for each failure.

Q&A #37. Aleksandr **Asked:** Please clarify general reporting for performance measure. Is it related to excess flow valves?

PHMSA RESPONSE (MIKE): Excess Flow Valve information is not a performance measure. We will use this to track any impacts between the increased number of EFVs and incidents.

Q&A #38. Gary **Asked:** Are all failures of mechanical fittings to be reported, i.e., only hazardous (Class 1) leaks or all class of leaks?

PHMSA RESPONSE (MIKE): Only Class 1 (or Grade A) leaks (defined as hazardous leaks) should be reported for Mechanical Fitting Failures. Other leaks not related to mechanical fittings reported on annual report forms under total leaks as operators has been doing in the past.

Additional Info (PHMSA): Several questions (Mel) were asked in response to whether or not reporting was required for only Grade 1 Leaks relative to Mechanical Fitting Failures.

Response: same as above #38

Q&A #39. National Fuel Gas **Asked:** Why does Leak Cause "Material or Welds" in the Annual Report Instructions not include "Fusions" like it does in the Mechanical Fitting Reporting Instructions?

PHMSA RESPONSE (MIKE): There are terminology differences between the Annual Report and the Mechanical Fitting Failure reporting that we will look to resolve in the future.

Q&A #40. Mary **Asked:** Will you present a Livemeeting for the transmission (Hazardous Liquid or Carbon Dioxide Systems) annual reports?

PHMSA Response (Roger): PHMSA will conduct a Webinar on the revised transmission annual report on March 31, 2011, and we'll have a similar one by summer for the hazardous liquid annual report.

Q&A #41. Lori **Asked:** Can you repeat the email address to request copies of the new reports?

PHMSA Response (Roger): Reports may be obtained at informationresourcesmanager@phmsa.dot.gov.

Q&A #42. Owen **Asked:** For Hazardous, Grade 1 leak certainly applies, what about Grade 2? **Mike:** Failures other than hazardous leaks (or per GPTC - Class 1 leaks) are Not required to be reported on mechanical fittings.

Q&A #43. Michael **Changes Question To:** Will MAOP info be required on annual gas or mechanical fittings reports? **Mike:** Not required in the mechanical fittings report.

Q&A #44. Robert **Changes Question To:** Hi, I joined a bit late, sorry if this question has already been discussed - what performance measures must be reported on the new form? **Mike:** same as required in the DIMP final rule: Number of hazardous leaks by cause; Total leaks by cause; number of excavation damages; number of excavation tickets; Total number of EFVs on single family homes (during year and estimated existing in the system)

Q&A #45. John **Asked:** For a mechanical fitting that leaks because of an excavation damage, let's say it was pulled apart and not the fault of the fitting, what should we use for the "Failure a Result of"?

PHMSA RESPONSE (MIKE): Please refer to the instruction to the form. There are options under "Cause of Leak" portion of the form. **It should be reported under Excavation damage.**

Q&A #46. John **Changes Question To:** For a mechanical fitting that leaks because of an excavation damage, let's say it was pulled apart and not the fault of the fitting, what should we use for the "Failure a Result of"?

PHMSA RESPONSE (MIKE): As mentioned earlier, under "Cause of Leak" we have a section for Excavation Damage with sub categories that should be used as specified in the instructions.

Q&A #47. Ben **Asked:** When exactly are we to start collecting mechanical fitting failure data?

PHMSA Response (Sara): Failures that occur in 2011 should be reported to PHMSA by 3/15/2012.

Q&A #48. Leo **Asked:** For mechanical fittings, are you only interested in those types of fittings that join two pieces of pipe in the linear axis? What about bolt on service tees which also provide a compression type seal?

PHMSA RESPONSE (MIKE): We are including all types of compression type mechanical fittings (including linear and non-linear). All of my questions are based on the information that is available now. States may have additional requirements since this is new information collection.

Q&A #49. Brian **Asked:** After a mechanical fitting failure form has been submitted, can it be retracted or corrected?

PHMSA Response (Sara): Any form submitted to PHMSA cannot be retracted, but it can be corrected by creating a supplemental report. This is done by logging into the PHMSA

Portal, locating the submitted report under Submitted Reports, which is under the View Report section. Once the record is located, select it, then click on “Create Supplemental” below the list of reports (near the bottom of the screen).

Q&A #50. Dave **Changes Question To:** In Part G (% of Unaccounted for Gas)- why are we reporting from June to June and not by calendar year?

PHMSA Response (Roger): Unaccounted for gas has always been collected from that time period, based on feedback RSPA had in the early 70’s that most companies were on a fiscal year basis for which that date would best accommodate having annual sales information available.

Q&A #51. John **Asked:** When will the LNG report be available? Assumed to be in the portal?

PHMSA Response (Sara): The LNG Annual Report will be available in early June via the portal and the LNG Incident report will be available in late May. Links to both forms will be available from the ODES homepage <http://opsweb.phmsa.dot.gov>

Q&A #52. Brian **Asked:** Do we also report mechanical fitting failures on steel pipeline systems?

PHMSA RESPONSE (MIKE): Yes. Failures should be reported on all material types of systems.

Q&A #53. Paul **Asked:** Did we hear you correctly that you can not upload from a company's work management system mechanical failures? It seems that we will have to manually type in the data for each failure. Can we do this on a monthly or quarterly basis?

PHMSA Response (Sara): Currently there is not an option to upload your data. If the volume of mechanical fitting failures is high, PHMSA will implement a mechanism to allow operators to upload information rather than completing a form for each failure. Failures that occur in 2011 may be submitted to PHMSA by 3/15/2012 in any time increment (as they occur, monthly, quarterly, etc).

Q&A #54. Mobeen **Asked:** Can you elaborate on threaded fitting, is a union included as threaded fitting or nut follower, is a elbow classified as threaded fitting, is a meter service valve threaded fitting

PHMSA RESPONSE (MIKE): If the threaded fittings are by itself, purely mechanical without the compression material (such as, elastomers) do not report that. But if it is part of a compression type fitting (e.g. Nut follower type), then it should be reported.

Q&A #55. Art **Changes Question To:** Are Flanged joints included? How about strap-on saddles? stainless steel band sleeves? split sleeves?

PHMSA RESPONSE (MIKE): Only compression type fittings should be reported. Examples in this question are not compression type fittings in our view.

Q&A #56. Ben **Changes Question To:** Do we report each mechanical coupling failure as it occurs or do we aggregate and report at end of year?

PHMSA Response (Sara): Each mechanical fitting failure needs to be reported separately. The report(s) do not need to be received until 3/15/2012, but an operator may file as they occur, monthly, quarterly, etc.

Q&A #57. Dan **Changes Question To:** part c: if you have 10 non hazardous leaks and 1 hazardous leak should the total column be 10 or 11 **Mike:** Assuming you are referring to Part C of [Annual Report Form](#) (Not mechanical fittings failure form) . Then total number should be 11.

Q&A #58. Owen **Asked:** In the past Grade 1 and 2 leaks were reported, are Grade 3 leaks to be reported in total leaks? **Mike:** In total leaks you should include all grades or classes.

Q&A #59. Michael **Changes Question To:** 3-part question...Will MAOP info be required on annual gas or mechanical fittings reports? Please define incorrect operations in part c. For part E, excess flow valve data - does this account for valves installed in 2011 or for existing valves as well? **Mike:** No MAOP info required currently. Incorrect

operations: as defined in the instructions for form F 7100.1-2 (Rev 01/11) as “... leaks resulting from inadequate procedures or safety practices, or failure to follow correct procedures, or other operator error...”

We are asking for 2 numbers regarding EFVs. The first number is for the total number of EFVs installed for the calendar year on single family residences. The second number is for an estimate of the total number of EFVs installed in the entire system up until the end of the reported calendar year.

Q&A #60. Ben **Changes Question To:** Should fitting reports be submitted as they occur or can they be submitted in mass at the end of the year? I assume March 15, 2012 deadline.

PHMSA Response (Sara): Each fitting failure must be submitted individually, but an operator has until 3/15/2012 to report all failures that occurred in 2011.

Q&A #61. Therese **Asked:** Will PHMSA be giving guidance to the States to postpone the Transmission Reporting until June also?

PHMSA Response (Roger): PHMSA will alert states about the PHMSA delay in due date for the gas transmission annual report.

Q&A #62. Richard **Changes Question To:** Could there be a way to upload data, especially for the mechanical fittings, instead of manually entering the report information. If we use a grass-roots method to collect the data, our computer systems could format the data to map into the DOT database. Thanks..... What about other mechanical fittings like bolted saddle tees? **If mechanical fittings (bolted saddle tees) are compression type fittings, yes they need to be reported.**

Q&A #63. John **Changes Question To:** For a mechanical fitting that leaks because of an excavation damage, let's say it was pulled apart and the failure was not the fault of the fitting, what should we use for the "Failure a Result of"? NOTE: NONE of the "Failure a Result of" checkboxes fit with an Excavation Damage. **Mike: leave it under**

excavation damage and answer sub questions under excavation damage whether it occurred during leak discovery or previous to leak discovery.

Q&A #64. Paul Asked: Is a mechanical bell and spigot joint considered a mechanical fitting/compression coupling?

PHMSA RESPONSE (MIKE): There are many designs in bell spigot joints. Most of them are compression type. Yes, you can put them under other compression type fittings. We will add this to our FAQs on the Distribution Website.

Q&A #65. Ben Changes Question To: I understand that the Gas Transmission Report is changing, but not due until June 15, 2011?

PHMSA Response (Roger): That is correct. The delayed date is for the 2010 filing due in 2011 only.

Q&A #66. Robert Asked: If an aboveground installation is struck by a vehicle, is the proper leak cause "outside force", or "excavation"? Excavation definition includes damage by vehicle, outside force does not. Mike: Can be put under either of the two causes.

Q&A #67. John Changes Question To: For a mechanical fitting that leaks because of an excavation damage, let's say it was pulled apart and the failure was not the fault of the fitting, what should we use for the "Failure a Result of"? NOTE: NONE of the "Failure a Result of" checkboxes fit with an Excavation Damage. Should it be left BLANK? Mike: Put under Excavation damage.

Q&A #68. Ben Changes Question To: Need clarification. One report per one mechanical fitting failure? Or can more than one failure be reported per form?

PHMSA Response (Sara): One report must be filed per mechanical fitting failure.

Q&A #69. Richard Asked: Are flange connections considered bolted compression mechanical fittings?

PHMSA RESPONSE (MIKE): Not unless there is some compression type material in there, like elastomers, rubber joints in the fitting. Many bolted couplings do have elastomers or o-rings present.

Q&A #70. Pam Asked: Will PHMSA look at standardizing the categories and definitions across the forms? For example weather & outside forces definitions are not consistent between distribution, transmission and incidents forms.

PHMSA Response (Roger): PHMSA will be making further changes to the gas distribution annual report to better align cause categories there with those on the other annual reports in the near future.

Q&A #71. Ben Changes Question To: Need clarification. Do we report only hazardous (grade 1) leaks on the mechanical fitting failure form? Mike: Yes.

Q&A #72. Gert Changes Question To: Mechanical Fittings - If there is a hazardous leak on a mechanical fitting that can be repaired by lubricating, tightening, etc .. would you still have to fill out a mechanical fitting report for that instance.

PHMSA RESPONSE (MIKE): No. Leaks that can be repaired by lubricating and /or tightening, should not be included.

Q&A #73. Farris Changes Question To: What is definition of federal land? Are post offices or federal court houses or office buildings considered federal land?

PHMSA RESPONSE (MIKE): This is handled in the FAQs on the DIMP website.

Q&A #74. Paul Asked: Is it possible to upload failures related to mechanical fittings via web services

PHMSA Response (Sara): Currently there is not an option to upload your data. If the volume of mechanical fitting failures is high, PHMSA will implement a mechanism to allow operators to upload information rather than completing a form for each failure.

Q&A #75. Roy **Asked:** i thought compression fittings must be removed & tightening is not acceptable???

<State Rule: Texas>

Mike: If it is installed incorrectly and can be easily tightened, greased, etc. to stop leak why not? Unless your state law does not allow.

Q&A #76. Barbara **Asked:** If a compression coupling fails due to 3rd party damage, is that a reportable failure?

PHMSA RESPONSE (MIKE): Yes.

Q&A #77. Mobeen **Changes Question To:** Can multiple users with one opid log on at the same time with the one login

PHMSA Response (Sara): More than one person can access/submit reports for one OPID, but each person should create a unique account and link that OPID to their user ID.
