



NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES

RESOLUTION

Central Region
State of Kansas
Resolution 2009-2 AC-1

Action Category 1

Urging PHMSA/OPS to Improve Reporting of Plastic Material Failure Data

WHEREAS: Plastic piping represents approximately 50% of installed distribution mains.

WHEREAS: The Plastic Pipe Database Committee (PPDC) was initiated as a joint Government/industry effort to create a database of in-service plastic piping material failures with the objective of identifying possible trends in the performance of these materials.

WHEREAS: The American Gas Association agreed to coordinate and maintain the PPDC database.

WHEREAS: The PPDC does not offer any guidance on what event constitutes a failure in natural gas piping.

WHEREAS: Participation by industry in the data collection effort is voluntary with the understanding that the data will not identify the operator associated with the failure.

WHEREAS: The PPDC analysis indicates the participating volunteers operate 77% of the installed plastic mains and 83% of the installed plastic services.

WHEREAS: While the stated goal of the PPDC is to create a national database of information related to the in-service performance of plastic piping materials, it is the collective experience of NAPSR and PHMSA members of the PPDC that not all data from known significant failures of plastic pipe or plastic pipe appurtenances, (e.g., risers, mechanical couplings, mechanical tees, steel-to-plastic transition fittings), are included in the PPDC database.

WHEREAS: Anonymous data submission does not provide regulators with a means of assessing the effectiveness of the voluntary data collection effort.

WHEREAS: The Gas Piping Technology Committee guide for gas transmission and distribution integrity management identifies incident and leak history, surveillance records and maintenance history as sources of data for evaluating existing and potential threats.

WHEREAS: The proposed DIMP regulation will require the operator to determine and implement measures designed to reduce the risks from failure by addressing the likelihood of failure associated with each threat.

WHEREAS: The preamble included in the DIMP NPRM notes that: "PHMSA believes changes to the PPDC process could significantly improve operator insight into the risks associated with plastic distribution pipelines. In particular, more data of better quality and improved availability of results from PPDC data analysis could help inform operators of potential integrity issues related to their plastic pipe."

THEREFORE BE IT RESOLVED THAT:

1. NAPSRS requests that PHMSA and AGA encourage the PPDC to clarify to its members that reportable in-service failures of plastic piping or components should include those failures that occur in the pipe body any appurtenances connected directly to the plastic pipe such as risers and mechanical couplings;
2. NAPSRS requests that PHMSA and AGA encourage the PPDC to publish the names of the companies that participate in the data collection effort while continuing to maintain the anonymity of the operator associated with each failure reported; and
3. PHMSA issue an interpretation that an unintentional release of gas from an operating pipeline facility is considered to be a failure of that facility.

Adopted September 17, 2009