BEFORE THE
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.

Notice of Proposed Rulemaking Pipeline Safety: Plastic Pipe Rule	}	Docket No. PHMSA-2014-0098

COMMENTS OF THE AMERICAN GAS ASSOCIATION
TO PHMSA NOTICE OF PROPOSED RULEMAKING: PLASTIC PIPE RULE

Founded in 1918, the American Gas Association (AGA) represents more than 200 local energy companies that deliver clean natural gas throughout the United States. Today, more than 68 million residential, commercial and industrial customers across the nation receive their reliable, affordable supplies of natural gas from AGA members—and natural gas meets almost a quarter of America's energy needs.

I. General Comments

AGA appreciates the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) published on May 21, 2015 (80 FR 29263). AGA supports many of the proposed changes found within the proposed rule. However, AGA requests that PHMSA remove Tracking & Traceability from the Plastic Pipe Rule. Due to the complexity and potential magnitude on the industry that the Tracking & Traceability requirements may have, AGA believes discussions and cost-benefit analyses associated with this topic will inhibit progression of the remainder of the rule. The proposed rule contains many elements of positive impact to the industry and pipeline safety, which, AGA would like to see implemented. In the next section of the comments AGA provides detailed remarks on the full NPRM. Within the specific comments AGA has outlined areas where further clarification is necessary or provides slight modifications to PHMSA proposals for the thoughtful advancement of pipeline safety.

II. Specific Comments

A. Tracking & Traceability

AGA understands PHMSA's attempt to codify material Tracking & Traceability within the natural gas industry, however research on and the implementation of this initiative remains in its infancy. The total impact of completing system-wide Tracking & Traceability on pipe and components is not fully understood and should be further explored prior to codifying the requirement. Due to the significance and potential cost of implementation, AGA encourages PHMSA to remove it from the Plastic Pipe Rule. The Tracking & Traceability requirements for

plastic pipe and components should be evaluated with the intent that the same system modifications and processes could also be utilized by operators for all material types. AGA believes addressing Tracking & Traceability independently for each material type is short sighted and will cause the industry to spend additional resources without added benefits.

The ability for gas operators to perform Tracking & Traceability is dependent upon process integration across multiple company functions. The necessary initiatives to create and implement Tracking & Traceability Programs (TTP) are not limited to just pipeline system installations or maintenance checks. Instead, installation and maintenance activities provide the final outcome only after a long list of actions has first been accomplished. TTP's require the integration of administrative departments, including product estimating, procurement, materials warehousing, information technology, and training. Within each of these functions numerous activities are required, such as contract creation, receipt of material, detailed information system planning, detailed employee training, and much more. This wide breath of impacted activities and departments exemplifies the necessity for a separate rulemaking and a phased approach to implementation.

Even after robust TTPs have been developed, the Traceability aspect of PHMSA's proposed regulation will require numerous Geospatial Information System (GIS) enhancements for a majority of the industry. It is unclear in the proposed rule if PHMSA's final intent is for operators to have the capability to locate specific pipe components to a high degree of accuracy within their systems. In order to accomplish this, operators will need to implement advanced GIS systems for their distribution piping systems, thus furthering the significance of this rulemaking.

Table 1 outlines three examples from AGA member companies that display the high level of significance that this rule will have on operators. The table summarizes the current status of an operating company's ability to achieve Tracking & Traceability on plastic pipe and components, the additional actions needed to meet PHMSA's proposal and the estimated cost to make those changes. It is apparent each one of these operators has taken actions prior to the release of the proposed rule; however, they would still have to expedite their initiatives to invest further in order to fully comply with PHMSA's proposed regulatory changes. In all of these situations the need to invest is substantial and should be phased in over several years.

Table 1: Example Tracking & Traceability Improvements and Associated Costs

Company	Current Tracking & Traceability Status	Projected Modifications Needed	Estimated Cost
A	Recently implemented work management and mobile data solutions at a cost of $20M. These solutions provide the foundation to support the collection, storage and utilization of tracking and traceability data.	Project modifications include the conflation of GIS mapping system, purchase of ruggedized barcode scanners with Bluetooth capability and sub meter GIS accuracy, IT programing changes, testing and training Additional increase in annual operating costs include barcode scanner replacement, IT support, data collections and data management	Implementation Cost: $ 11.375M Annual Increase: $2.85 M
B	Completed GIS Mapping conflation exercise to enable accurate Traceability data entry.	Purchase of Hardware (ruggedized barcode scanners) and implementation, programming and training of necessary IT Systems. Increased annual costs including barcode scanner replacements, IT support and data management.	Implementation Cost: $ 18.75 M Annual Increase: $3.25 M
C	Implemented GIS Mapping for Distribution System.	Implement Data and Document Management Systems, including Construction & Mapping. Purchase Hardware (data storage, GPS, barcode readers, software, etc.) Increased annual costs including hardware replacements, materials management personnel and technical support for enterprise systems and engineering.	Implementation Cost: $9.4M Annual Increase: $4.1M

AGA would also like to encourage PHMSA to align the material traceability attributes listed in the proposed §192.3: *Traceability,* with the information currently captured per ASTM F2897-11a: *Standard Specification for Tracking and Traceability Coding System of Natural Gas Components (Pipe, Tubing, Fittings, Valves and Appurtenances)*. The plastic pipe and component manufacturing industry has taken steps to include all the information suggested by ASTM F2897-11a into an advanced barcoding system. Any variations from these standards will require plastic pipe and component manufacturers to modify their existing barcode systems and will require operators to modify their barcode readers or information gathering systems. AGA also discourages PHMSA from requiring items such as pressure rating and temperature rating in the required Traceability information. These ratings are already linked to the lot information and do not need to be called out separately. The separate capture and storage of the ratings and the information used to determine those ratings is unnecessary and duplicative in nature. The differences between ASTM F2897-11a and the attributes contained in PHMSA's proposal are outlined in Table 2.

Table 2: PHMSA Proposal vs. ASTM F2897-11a for Traceability

PHMSA Proposal	ASTM F2897-11a
	Manufacturer
Location of Manufacture	
Production	
Lot Information	Lot Information
	Production Date
Material	Material
Type	Type
Size	Size
Pressure Rating	
Temperature Rating	
Model	

AGA is also concerned that the barcoding requirements will prohibit competitive business practices, due to some manufacturers having not implemented pipe and component data tracking capabilities. Even when all United States manufacturers adhere to the national standard, ASTM F2897-11a, many of the international vendors that companies utilize will not have incorporated this standard into their processes. AGA cautions PHMSA that codifying such a requirement may impede competitive business.

AGA does not support the specific requirement within §192.63(e)(3) that all markings be permanent. The intent of the marking on the plastic pipe or component is to aid in the capture of Traceability data. Once the data has been captured and stored, AGA believes the marking on the pipeline is unnecessary. Therefore, when PHMSA moves forward with Tracking & Traceability, AGA suggests that PHMSA modify their proposal to require markings remain legible

and visible up to twenty years. AGA believes it is unnecessary for the Traceability information to be legible and visible after the pipe or component has been installed. AGA recommends the following modified language for §192.63(e)(3).

> §192.63(e)(3) - All markings on plastic pipelines prescribed in the specification and paragraph (e)(2) shall be legible and visible in accordance with the listed specification for at least twenty years. Records of markings prescribed in the specification and paragraph (e)(2) shall be maintained for the life of the pipe per requirements of §§192.321(k) and 192.375(d).

In order to not delay the remainder of the Plastic Pipe Rule, AGA encourages PHMSA to separate out this part of the rulemaking and address it in an independent proposed rule. When Tracking & Traceability moves forward, AGA would like to encourage PHMSA to evaluate a phased approach to compliance for §192.321(k) and §192.375(d), and subsequent requirements for all pipeline materials.

After the development of industry standards, such as ASTM F2897-11a, and the incorporation of those into code, operators will still have a significant amount of preparation work to complete prior to having the ability to comply with the new regulation. Ideally a Task Group comprising of pipe and component manufacturers, industry, and federal and state regulators could help guide the implementation of Tracking & Traceability over the next several years. To begin the conversation, AGA proposes PHMSA provide a timeline for compliance, starting first with ensuring appropriate processes are in place for data transfer and capture. Then, in Phase B, allow for a period of time where operators begin to capture Traceability data. Simultaneously, in Phase C, operators will be ramping up any modifications to their systems necessary to Track the data in their systems of record, such as Geospatial Information Systems (GIS). Table 3 outlines AGA's proposed phased approach for the implementation of Tracking & Traceability on pipe and components. The phase approach over several years would also allow companies to appropriately spread the cost to comply over several budgeting cycles.

Table 3: AGA's Proposed Phase Approach to Tracking & Traceability

Phase	Implementation	Effective Date
A	Develop process to capture traceability information on pipe & components	Effective Date of Rule + 1 year
B	Begin barcoding Traceability information on pipe, valves and fittings	Effective Date of Rule + 3 years
C	Begin Tracking location of information on pipe, valves and fittings	Effective Date of Rule + 5 years

B. Design Factor of PE

AGA thanks PHMSA for addressing AGA's petition for an increased design factor for Polyethylene (PE) Pipe in this Proposed Rule. Although AGA's original petition didn't directly address pipe larger than 12-inch diameter, AGA encourages PHMSA to evaluate including larger pipe diameters in the code language and table referenced in §192.121(c)(2)(iii) and (iv) respectively. In recent years operators are starting to install larger diameter PE pipe, specifically 16-inch diameter pipe. AGA suggests PHMSA modify the code language and table referenced to include the pipe sizes incorporated in ASTM D2513-14. See below and Table 4 for AGA's suggested edits.

§192.121(c)(2)

(iii) The pipe has nominal size (IPS or CTS) of 24 inches or less; and

(iv) The wall thickness for a given outside diameter is not less than that listed in the following table:

Table 4: AGA Proposed Minimum Wall Thickness for PE Pipe

Pipe size (inches)	Minimum wall thickness (inches)	Corresponding DR (values)
½" CTS …..	0.090	7
¾" CTS …..	0.090	9.7
½" IPS ……	0.090	9.3
¾" IPS ……	0.095	11
1" IPS …….	0.120	11
1 ¼" IPS …	0.151	11
1 ½" IPS …	0.173	11
2" …….	0.216	11
3" ……	0.259	13.5
4" ……	0.265	17
6" ……	0.315	21
8" …….	0.411	21
10" …….	0.512	21
12" …….	0.607	21
16" …….	0.762[1]	21
18" ……..	0.857[1]	21
20" ……	0.952[1]	21
22" ……	1.048[1]	21
24" ……	1.143[1]	21

AGA also encourages PHMSA to allow the use of the increased design factor for certain existing pipe. When the American Society for Testing and Materials (ASTM) issued ASTM D2513-08B in 2008, the new pipe material designation codes of PE2708 and PE4710 were introduced. AGA

[1] ASTM D2513-14. *Standard Specification for Polyethylene (PE) Gas Pressure Pipe, Tubing and Fittings.* Table 4 – Wall Thicknesses and Tolerances for Plastic Pipe, Inches. July 2014.

believes that the new design factor should be allowable for pipe of these designations. The manufacturing process has remained consistent; therefore no reason exists as to why operators could not utilize the increased design factor for pipe manufactured prior to the effective date, consistent with the recognized standards.

C. Expanded Use of PA -11

AGA supports the expanded use of Polyamide-11. AGA encourages PHMSA to expand the table found in §192.121(d)(2)(iv) to include ¾-inch diameter pipe. The same minimum wall thickness and corresponding DR value can be utilized for PE and PA-11 pipe. AGA recommends that the table be modified as shown in Table 5.

Table 5: AGA Proposed Minimum Wall Thickness for PA-11 Pipe

Pipe size (inches)	Minimum wall thickness (inches)	Corresponding DR (values)
¾" IPS …….	0.095	11
1" IPS …….	0.119	11
1 ¼" IPS …….	0.151	11
1 ½" IPS …….	0.173	11
2" …….	0.216	11
3" …….	0.259	13.5
4" …….	0.333	13.5
6" …….	0.491	13.5

D. Incorporation of PA-12

AGA supports the expanded use of Polyamide-12. AGA encourages PHMSA to expand the table found in §192.121(e)(3) to include ¾-inch diameter pipe. The same minimum wall thickness and corresponding DR value can be utilized for PE and PA-12 pipe. AGA recommends that the table be modified as shown in Table 6.

Table 6: AGA Proposed Minimum Wall Thickness for PA-12 Pipe

Pipe size (inches)	Minimum wall thickness (inches)	Corresponding DR (values)
¾" IPS …….	0.095	11
1" IPS …….	0.119	11
1 ¼" IPS …….	0.151	11
1 ½" IPS …….	0.173	11
2" …….	0.216	11
3" …….	0.259	13.5
4" …….	0.333	13.5
6" …….	0.491	13.5

E. Risers

AGA supports GPTC's petition for the construction of risers that will allow termination of plastic pipe above ground level at the inlet or outlet of regulator and metering stations. AGA suggests that the structural support requirement, especially for service risers, be flexible to other solutions beyond just a 3 foot horizontal base leg. As long as the structural support has been designed in accordance with sound engineering practices and it will meet PHMSA's intent of adequate support to resist lateral movement, it should be allowed. Also, it is AGA's understanding that since the proposed change is within the design section of the code, this requirement is not retroactive and will not apply to risers installed prior to the effective date of the rule.

F. Fittings

AGA supports PHMSA's intent for the proposed changes to §192.455 – *External corrosion control: Buried or submerged pipelines installed after July 31, 1971.* However, in the proposed rule, PHMSA does not address the cost to comply with the proposed regulation. With this change as written, natural gas operators would need to: (1) locate all electrically isolated metal alloy fittings, (2) install cathodic protection, (3) install test stations for monitoring, and (4) develop a comprehensive monitoring program. Each of these tasks will redirect operator resources away from higher risks on the pipeline systems.

AGA does not believe the requirement for cathodic protection and monitoring should be retroactive. Instead operators should only be responsible for installing cathodic protection whenever an isolated metal alloy fitting that requires cathodic protection is exposed during excavation or installed after the effective date of the final rule. There are several mechanical fasteners or compression rings which are made of corrosion resilient alloys and have not had corrosion issues in normal buried applications. AGA believes these fittings should not be considered in the additional requirements for §192.455.

AGA also proposes the requirements for cathodic protection monitoring for these fittings should be on a modified basis from that required in §192.465(a). AGA also encourages PHMSA to explore an allowance for other cathodic protection options, such as anode bed installations with sufficient capacity to ensure the elimination of potential corrosion. AGA would like to recommend the following language for §192.455.

> §192.455 – *External corrosion control: Buried or submerged pipelines installed after July 31, 1971.*
> (a) Except as provided in paragraphs (b), (c), (f), and (g) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following:
> …
> (g) Electrically isolated metal alloy fittings that require cathodic protection and are installed in plastic pipelines after [INSERT EFFECTIVE DATE OF FINAL RULE] not

meeting the criteria contained in paragraph (f) must be cathodically protected and monitored at a minimum of once every tenth year.

G. Plastic Pipe Installation

G1. Installation by Trenchless Excavation

AGA supports the intent of PHMSA's proposed definition for a Weak Link, but would like to provide suggested modifications. As currently written, PHMSA suggests that a Weak Link must be a specific device, such as a pull head with sheer pins. However, it is a common practice in industry for operators to utilize a plastic pipe in a smaller diameter sized pipe that is designed to fail before the carrier material yields as a Weak Link. AGA believes if means are taken to ensure that the pipe is not damaged and there are sound engineering practices behind the use of the tool, it should be acceptable in practice.

AGA only supports the requirement for Weak Links in trenchless installations on mains but not on small diameter service lines (i.e. 1- ¼ inch IPS and smaller), as the construction techniques for small diameter service lines are not compatible with the use. In order to determine if there is a need for use of Weak Links on small diameter service lines, a detailed analysis should be performed on damages to small diameter service lines due to excess pulling that were installed through a trenchless installation method where no Weak Link was utilized. In the event that no such damages have been experienced, AGA believes there is no justification in the requirement for the use of a Weak Links on small diameter service lines.

AGA would also like to suggest modified language for §192.329(a) and §192.376(a). As currently proposed both sections indicate that it is the natural gas operator's responsibility to identify the existence of all underground facilities and accurately locate those facilities. AGA believes this is a shared responsibility for all underground utilities. If the utility is not known to the pipeline or service installer due to a lack of response to One-call or due to One-call enforcement exemptions, the operator will make every attempt to locate any facilities themselves. If an underground facility remains unknown to the operator, it negates the operator's ability to proactively ensure sufficient clearance. As currently proposed, PHMSA does not differentiate existing underground facilities and structures from those that are installed after the natural gas pipeline installation. The lack of this differentiation leaves regulatory uncertainty, therefore AGA suggests the following modified code language.

> §192.329(a) and §192.376(a) - Each operator shall ensure that the path of the excavation will provide sufficient clearance for installation and maintenance activities from other known underground utilities and/or structures at the time of installation.

G3. Qualifying Joining Procedures and G4. Qualifying Persons to Make Joints

As currently proposed in §192.281(c), PHMSA solely supports the utilization of industry standard ASTM F2620-12: *Standard Practice for Heat Fusion Joining of Polyethylene Pipe and Fittings.* This standard was qualified based on internal pipe pressures with a 0.4 Design Factor. Therefore, AGA supports the use of this single standard only for saddle fusion joint procedures, due to the fact that this is the only fusion type that is utilized on gas lines with live gas or internal pressure. However, butt and socket fusion procedures should not be restricted to ASTM F2620-12. Operators develop their procedures using a variety of resources including Plastic Pipe Institute's standard Pipe Joining Procedures, manufacturers qualified joining procedures or their own internal company qualified procedures. An example of where proven company procedures may differ from ASTM F2620-12 is in heater surface temperature ranges. Many operators have historically successfully utilized heater surface temperatures that differ from ASTM F2620-12. In many cases operators have qualified their procedures and fusers with these proven temperatures. By changing the requirement, operators would then have to requalify new procedures, modify specifications and requalify all fusers in order to accommodate the new standard. AGA believes that these proven procedures are appropriate for pipe joining, and §192.281(c) should be modified as follows:

> §192.281(c) *Heat Fusion Joints* – Each saddle fusion joint on a plastic pipe and/ or component must comply with ASTM F2620-12. Each socket or butt fusion joint on a plastic pipe and/or component must comply with a qualified fusion procedure and the following:

AGA disagrees with PHMSA's proposed language in §192.281(c)(2). Some industry operators perform socket fusion joints up to 2-inches and in specific situations may do so up to 4-inches. AGA believes there is no technical justification for the 1¼ - inch limit. AGA proposes the following modified language:

> §192.281(c)(2) - A socket heat-fusion joint equal to or less than 4 inches must be joined by a device that heats the mating surfaces of the pipe and/or component, uniformly and simultaneously, to establish the same temperature. The device used must be the same device specified in the operator's joining procedure for socket fusion. A socket heat-fusion joint may not be joined on a pipe/and or component greater than 4 inches.

G6. Installation of Plastic Pipe

For many years plastic pipeline operators have used the *PPI Handbook for PE Pipe* for construction guidance. In Chapter 7 – *Underground installation of PE pipe,* it is recommended that "the material and compaction requirements for the final backfill should reflect sound engineering practices and satisfy local ordinances and sidewalk, road building or other applicable regulations."

AGA supports sound construction installation practices that ensure the adequate support of plastic pipe. However, AGA does not support the additional backfill requirements found in §192.321(i)(2) and §192.386(c)(2). In both cases PHMSA proposes the additional requirement that backfill "be properly compacted underneath, along the sides, and for predetermined depth above the pipe." This code language is very ambiguous and will require additional clarification prior to the industry understanding the compliance burden. By choosing to require proper "compaction" versus "support," PHMSA will inadvertently require the industry to quantify the level of compaction above, around and on top of each plastic pipe main and service installation. The industry will find it necessary to determine what a "proper" level of compaction is in each of those scenarios. Compaction levels can differ greatly depending upon jurisdictional requirements from permitting agencies, soil type and conditions and whether the installation is occurring in undisturbed ground or in a previously disturbed area.

Instead, AGA suggests PHMSA modify the regulation to directly address the risks to the pipeline. If the code language is intended to prevent ring deflection or sheering stresses, operators will be able to determine what construction practices are necessary to achieve those goals. AGA suggests the following modified language for §192.321(i) and §192.386(c).

> Plastic Pipe that is being installed in a trench must comply with the following:
> (1) Backfill material in contact or close proximity to the pipe must not contain materials that could be detrimental to the pipe, such as rocks of a size exceeding those established through sound engineering practices.
> (2) Where there is potential for ring deflection or shear stresses on the pipeline due to anticipated loads, the pipeline must be properly installed with support.

G8. Equipment Maintenance; Plastic Pipe Joining

AGA does not support the prescriptive proposed language in §192.756 and believes the requirements as suggested are a large burden on operators. Instead, AGA requests that PHMSA limit the code requirements to §192.756(a). By doing so, the regulation will then place the ownership on the operator to determine appropriate internal programs to maintain necessary equipment maintenance records. Each operator should have an equipment maintenance program that meets equipment manufacturer's recommended practices or written standards.

AGA also reminds PHMSA that their requirements are specific to equipment calibration, however depending on the type of fusion being performed, the machine may not need any calibration and instead may only need inspections for proper maintenance.

H. Repairs

H1. Repair of Plastic Pipe

AGA disagrees with PHMSA's decision to demarcate scratches and gouges greater than 10% in §192.311: *Repair of Plastic Pipe,* as an imperfection that needs repair or removal. AGA notes that the rule of thumb of 10% of wall thickness is currently utilized by operators and is referenced in AGA's Plastic Pipe Manual. However, it is considered to be a conservative methodology adopted to ensure that the scratch or gouge is not greater than 20%, which is the industry recommendation from manufacturers and industry organizations. In 1999 several individuals from the Southwest Research Institute, University of Pennsylvania and the Gas Research Institute (GRI) presented a paper at the 16th International Plastic Pipe Fuel Gas Symposium in New Orleans, LA, titled "*Experimental Determination of Allowable Crack Depths in Polyethylene Pipes Subjected to Internal Pressure Loading.*[2]" This paper was summarized with the following conclusion:

> *None of the samples that possessed initial flaws that were 10 percent of the pipe wall thickness in depth failed during the simulated 350-year service history at nominally [140 psig] pressure and [68°F]…*
>
> *Moreover, the data for PE-B, PE-C, and PE-D pipes show that service lines are at least 350 years for nominally 30 percent initial cracks and for the latter two materials at least 250 years for nominally 50 percent cracks. For these materials and pipe sizes, the 10 percent rule of thumb is very conservative.*

The industry research utilized for the presentation is found in the paper "*Service Performance of PE Pipes Containing Surface Notches Subjected to Internal Pressures."* [3] by GRI.

As proposed the language for §192.311(a) also implies that new technologies designed to address scratches and gouges in PE pipe, such as electrofusion fitting repair sleeves, would not be allowable due to the fact that PHMSA requires a repair.

AGA suggests only requiring a modified §192.311(a), which requires the removal of imperfections or damages, and removing §192.311(b) from proposed pipeline safety code language. This would allow operators to follow manufacturer recommendations and make conservative determinations on the imperfections or damages that should be removed or repaired. AGA suggests the following modification to §192.311(a):

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[2] D.A. McKee, C.H. Popelar, C.J. Kuhlman, N. Brown and M.M. Mamoun. *Experimental Determination of Allowable Crack Depths in Polyethylene Pipes Subjected to Internal Pressure Loading.* 1999 International Plastic Pipe Symposium.

[3] D.A. McKee, C.H. Popelar and C.J. Kulhman. *Service Performance of Polyethylene Pipes Containing Surface Notches Subjected to Internal Pressure.* Gas Research Institute. June 2000.

§192.311(a) Each imperfection or damage that would impair the serviceability of plastic pipe must be repaired with a suitable electrofusion sleeve or the damaged pipe must be replaced.

H2. Leak Repair Clamps

AGA would like clarification on whether the additional regulation §192.720 - *Distribution systems: Leak repair,* within Subpart M – *Maintenance,* is intended to be retroactive in nature. While AGA understands PHMSA's desire to ensure that companies are following manufacturer's recommendations to not utilize mechanical leak repair clamps as permanent repair methods, AGA does not believe it is PHMSA's intent to require operators to find and locate all existing leak repair clamps already installed on plastic pipe in their system.

AGA supports a regulation encouraging operators to remove any existing mechanical leak repair clamps not meant for permanent repairs, as they are discovered in the system. However, AGA also cautions PHMSA that regulations as currently proposed may impair new technology to enter the market place. AGA suggest PHMSA modify §192.720 to require compliance after the effective date of the Final Rule and to limit the requirement to mechanical leak repair clamps. AGA suggests the following language.

§192.720 – *Distribution systems: Leak repair*

(1) Except as provided in paragraph (a) a mechanical leak repair clamp may not be used as a permanent repair method for plastic pipe after [INSERT EFFECTIVE DATE OF FINAL RULE].
   (a) Mechanical leak repair clamps must be tested and qualified for permanent repair.
(2) Upon discovery, any leak repair clamp not intended for permanent repair must be removed.

I. General Provisions

I3. Storage

AGA requests additional background information on PHMSA's addition of §192.67. AGA is under the impression that this new requirement is due to the adoption of ASTM D2513-09a and the extension of outdoor storage ability.

I7. Valves

To ensure no confusion about the need for operators to find and replace existing valves not meeting the proposed language in §192.145(f), AGA suggests the following modified language:

§192.145(f) – Newly installed plastic valves must meet the minimum requirements stipulated in a listed specification. A valve may not be used under operating conditions

that exceed the applicable pressure and temperature ratings contained in those requirements.

III. Conclusions

In general, AGA supports most of the plastic pipe regulation updates as proposed. There are a few sections throughout the Proposed Rule where AGA encourages PHMSA to reevaluate the technical justifications. In some cases, AGA has provided suggested modifications to the regulatory language.

AGA supports the intent and concepts behind the Tracking & Traceability of pipe and components. However, AGA urges PHMSA to remove this section of the proposal from the final rulemakings. The challenges for implementation remain numerous and uncertain and can therefore not be considered non-significant at this time. Removing this portion of the proposed rule would allow PHMSA to move forward on the remainder of the items found within the Plastic Pipe Rule. The separation would also allow PHMSA to work with the appropriate stakeholders to continue the progressive conversations pertaining to Tracking & Traceability.

AGA appreciates the opportunity to comment on this proposed rule.

Respectfully submitted,

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