R.W. Lyall
& Company, Inc.
Gas Piping Products

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Reference: Docket No. PHMSA-2014-0098

To Whom It May Concern:

R.W. Lyall (Lyall) is a leading manufacturer of Risers, Transitions, Plastic Mechanical Fittings and PE Ball Valves serving the natural Gas Distribution market for over 40 years. Lyall supplies product to over 200 customers in the U.S.A., Canada & Mexico.

Lyall appreciates the opportunity to comment on this Notice of Proposed Rulemaking (NPRM) and supports PHMSA's efforts to promote enhancements to pipeline safety afforded by the advancement in materials, technologies and practices.

Specific Comments:

1) Tracking and Traceability

Lyall recognizes the benefits a standardized format for the transfer of pedigree information for critical gas pressure components has on the timely and efficient mitigation of any issue that may arise within the natural gas distribution infrastructure. Lyall participated with a cross section of industry stakeholders, working closely during the development of the architecture and syntax for the 16-character identifier standardized in ASTM F2897. Lyall has marked its gas pressure carrying components with the ASTM F2897 identifier since January of 2012. The 16-character identifier is comprised of six (6) sections or 'words' of varying length encoded to provide specific information about the component that can be recorded at the time of installation. These six (6) sections are:

Component manufacturer
Component manufacturer's lot code
Component production date
Component material
Component type
Component size
In addition to these sections there is a one character Index for the base-62 code.

The recorded 16-character identifier linked to component location at the time of installation becomes a permanent record and when parsed for specific attributes allows tracking and comparison with other assets in the system. Likewise, when the identifier is parsed, additional detailed information is traceable from the component Mfg.'s Lot Code through the Component Manufacturer.

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On page 29272 of the NPRM [§ 192.3] Definitions; PHMSA proposes a definition for traceability that goes beyond requiring the data that is provided within ASTM F2897-11a and requires Location of manufacture, Production (It is unclear what is meant by this), Pressure rating, Temperature rating and potentially Grade and Model of the pipe and components. Requiring the addition of this information, which is not included in ASTM F2897-11a, nullifies the efforts to provide a standardized identifier and may impede the progress of tracking and traceability within the gas distribution system. Lyall proposes that PHMSA align any traceability requirements with ASTM F2897 and limit the information to the six (6) sections included in the specification. Lyall proposes the following language:

> *Traceability Information* means data that is provided within ASTM F2897-11a (incorporated by reference, see § 192.7) and includes Component manufacturer, Component manufacturer's lot code, Component production date, Component material, Component type, Component size.

Due to the architecture changes necessary within the data systems needed by the operators to gather and record the 16-character code per ASTM F2897-11a that will cause significant impact on operators in addition to the time needed for implementation, Lyall recommends that PHMSA provide for an adequate transition period for implementation of the requirements in this section.

On page 29273 of the NPRM [§ 192.63(e) (2) & (3)] Marking of Materials, PHMSA establishes that pipe and components must be marked in accordance with ASTM F2897 in addition to the listed specification and that all markings prescribed in the listed specification and in ASTM F2897 shall be legible, visible and permanent. Lyall recognizes the intent of the rule change is to require affixing the marking information in such a way that it is present on the pipe or component at the time of installation, it is readable and that capturing and recording of the required component traceability data is possible. Lyall's concern is that the use of the word 'permanent' without additional qualifiers would make compliance with this section impossible. Lyall proposes that PHMSA modify the language as follows:

> § 192.63(e)(3) - All markings on plastic pipelines prescribed in the listed specification and paragraph (e)(2) shall be legible and visible and marked in accordance with the listed specification. 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).

2) Risers

On page 29274 of the NPRM [§ 192.204(c)] Risers, PHMSA includes a requirement that "all risers connected to plastic mains and used on regulator stations must be rigid and have a minimum 3 ft. horizontal leg designed to provide adequate support and resist lateral movement. Lyall's concern is that this prescriptive language requiring 3 ft. horizontal leg is ambiguous and would unduly restrict the use of properly supported and installed large (>2 IPS) straight casing anodeless risers. Lyall has been making anodeless risers for more

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than 40 years and makes many configurations that have straight casings with 90° fused PE horizontal legs supported by brackets and stakes so that the plastic does not support external loads.

In 2014, the GPTC filed a petition for PHMSA to allow aboveground, encased plastic pipe (anodeless riser) for regulator and meter stations. Lyall proposes that PHMSA adopt performance-based language as follows:

> § 192.204 (c) – All risers connected to plastic main and used on regulator and metering stations must provide:
> (1) The above-ground level part of the plastic is protected against deterioration and external damage.
> (2) The plastic pipe is not used to support external loads.
> (3) The Riser design shall be tested and accepted in accordance with ASTM F1973 (incorporated by reference, see § 192.7.

On page 29274 of the NPRM [§192.204(b)] states: “risers shall be designed and tested in accordance with ASTM F1973”. This restricts risers to “factory assembled” risers and excludes risers that are “field assembled” and manufactured to ASTM F2509 - Standard Specification for Field-assembled Anodeless Riser Kits for Use on Outside Diameter Controlled Polyethylene Gas Distribution Pipe and Tubing. Lyall recommends that PHMSA modify the language as follows:

> §192.204(b)] - Risers shall be designed and tested in accordance with a listed specification (see § 192.7).
>
> Lyall also recommends that PHMSA add ASTM F2509 to the list of documents incorporated by reference in § 192.7.

3) General Requirements

On page 29274 of the NPRM [§ 192.143(c)] – General requirements, PHMSA states: “Each plastic component of a pipeline must be able to withstand operating pressures and other anticipated loads in accordance with a listed specification.” It appears that all plastic components will need a listed specification to use them. PHMSA is now referencing ASME B16.40 in §192.7 to satisfy requirements proposed in this NPRM [page 29274, §192.145(f)] but ASTM F2138 - Standard Specification for Excess Flow Valves for Natural Gas Service is not listed in §192.7 or included in this NPRM. EFV’s are currently required by code in §192.381 and ‘must be manufactured and tested by the manufacturer according to an industry specification, or the manufacturer’s written specification’ but not necessarily a listed specification. Lyall proposes that PHMSA modify the language in any one of the two proposals that follow:

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§192.143(c) - Except for Excess Flow Valves (§ 192.381, § 192.383), each plastic component of a pipeline must be able to withstand operating pressures and other anticipated loads in accordance with a listed specification.

Or

§192.143(c) - Each plastic component of a pipeline must be able to withstand operating pressures and other anticipated loads in accordance with a listed specification.
And
Add ASTM F2138 to the list of documents incorporated by reference in § 192.7

Sincerely,

R.W. Lyall & Company

Greg Goble
Director – New Technologies and Compliance

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