THIS IS THE EXCERPT FROM THE DRAFT MECHANICAL FITTNG FINAL RULE THAT WILL DISCUSS THE CHANGES TO THE GAS DISTRIBUTION ANNUAL REPORT AND THE NEW MECHANICAL FITTING FAILURE FORM.

PRA

In response to the comments received from the 60-day PRA notice contained in the DIMP final rule, PHMSA made a number of revisions to the Gas Distribution Annual Report. To maintain transparency and gather further input, PHMSA published a 30-day notice (June 28, 2010; 75 FR 36615) to seek additional comments on the revised Gas Distribution Annual Report. PHMSA received eight comments which have been reviewed and responded to as follows.

Section of Form	Comment	PHMSA Response/Resulting Action
General	Standardize information collection terminology used for both Incident and Annual Report Forms.	PR1. This will be addressed during the information collection renewal process that occurs every three years.
Part A. Operator Information Question 6. (Commodity Transported)	Instructions are unclear as to how operators with multiple gases should respond.	PR2. This question has been removed.
Part C. Total Leaks and Hazardous Leaks Eliminated/Repaired During Year	There is no specific entry for collecting mechanical fitting leaks eliminated/repaired during the year in Part C. Since failure data on such fittings is collected in Part F, it would make sense to collect data specifically on them in	PR3. PHMSA is moving Part F to a separate form and therefore, will not make the suggested revision.

	Part C.	
	Modify form instructions for Part C to have all mechanical fitting failures included in "Material and Welds" as stated in 192.1007(b). Remove from "Equipment."	PR4. PHMSA is moving Part F to a separate form and therefore, will not make the suggested revision.
	For aboveground leaks, clarify the instructions to state that operators should only report hazardous aboveground leaks (the preponderance of aboveground leaks are trivial and represent no threat to the public.)	PR5. PHMSA disagrees. PHMSA maintains that, based on the intent of recent guidance, all aboveground leaks should be reported unless the leak is a non-hazardous leak that can eliminated by lubrication, adjustment, or tightening.

Part E. EFV Data	Operators should simply report all EFVs installed on the distribution system, not just on Single Family Residences. (No records to distinguish commercial and residential.)	PR6. As detailed in DIMP, PHMSA will require each operator, on an annual basis, to report the number of EFVs installed during the year on service lines serving single-family residences. PHMSA has included another block to allow for companies to estimate the total number of EFVs installed in their system.
	The instructions should expressly state that operators can estimate the number of EFVs in service.	PR7. PHMSA will allow for estimates on the total number of EFVs in the system.
	The option regarding reporting single-family or single-family branch services is confusing	PR8. PHMSA agrees and has removed this provision.

	and holds no value. (Should be removed.)	
	This is a significant change from what was originally proposed, which was to report the number of EFVs that the operator installed during the year, which was easy to capture. Plus no discussion as to why this change was made.	PR9. PHMSA is requiring primarily the number of EFVs installed per § 192.383 for the year. PHMSA is also requiring operators to estimate the total number of EFVs installed in their system.
	It is not a problem identifying EFVs added to system for the year (w/no distinction to type).	PR10. See PR7 and PR9.

	Will successive annual reports require a cumulative total number of EFVs installed or only the number installed for the calendar year reporting period? If cumulative, from what date forward?	PR11. See above. PHMSA is requesting CY 2010 data based on installation pursuant to § 192.383(b). PHMSA is also requesting operators to provide an estimated total number of EFVs installed in a system.
Part F. Mechanical Fitting Failure Data (THIS INFORMATION WILL BE PLACED ON THE NEW MECHANICAL FITTING FAILURE FORM)	Form a stakeholders group to review the results and decide if the information request should sunset after the three-year OMB approval. Information in Part F is comprehensive and duplicative to other data collection efforts.	PR12. PHMSA will first seek to use the notice and comment process. However, PHMSA will continue to consider such actions for future revisions.
	A major problem is the enormous expansion of the data. Mechanical fittings encompass an almost infinite universe of fittings. PHMSA's federal register notice provides no explanation or justification for the expansion of the data request. Expanding the reporting scope increases reporting requirements by several orders of magnitude. There is no information in this OMB approval request regarding the paperwork burden for the great expansion in the data request. (Replace "mechanical fittings" with "compression couplings.")	PR13. PHMSA is not expanding the reporting scope. Based on DIMP we are only looking for failures that result in a hazardous leak on "compression style" fittings (e.g. stab, nut follower, bolted.).
	The "other" category following stab, nut follower,	PR14. PHMSA wants to confirm that there are no

	and bolted couplings should be deleted since they are the only type of compression type fittings.	other types of compression type coupling in use. Therefore, PHMSA is retaining the "other" category with a slight revision to change "other" to "Other Compression Type Fitting."
	Delete the line beginning with "Was the Failure a Result of" and the associated subcategories.	PR15. PHMSA has deleted the line beginning with "Was the Failure a Result of" and revised the associated subcategories.
	Delete "Pull Out" as a choice for "Location of Leak."	PR16. PHMSA is keeping the "Pull Out" as a choice for "Location of the Leak" and revising "Location of Leak" to "How did the leak occur."
	Rather than use the bullet outline ("►", "♦") throughout Part F, use a numbered outline format so that the subsections of Part F can be clearly referenced if questions arise.	PR17. PHMSA is creating a new form for Part F with an outlined form.
	The form should allow "Unavailable" to be entered under "Year Installed," "Year Manufactured," and "If Year Unknown, Provide Decade Installed:" This option is provided for in the instructions for the bulleted items after this section.	PR18. PHMSA is revising the instructions to allow for "Unavailable."
	Part F of the form would be reproduced for each separate	PR19. In addition to separating out Part F onto

	event where failure of a compression fitting results in a hazardous leak. PHMSA should provide that the (electronic) form have an index or tracking number to identify separate events within the calendar year (such as 20XX-XXX). Such a mechanism is important, not only to distinguish between reports compiled during the year, but also in the case where information is later determined to require a supplemental report to be filed.	its own form, PHMSA will create a unique identifier for each report.
	The section titled “Location of Leak” should be relabeled “Type of Failure” with the existing choices: “Leak Through Seal,” “Leak Through Body,” or “Pull Out.”	PR20. PHMSA revised the section title from “Location of Leak” to “How did the leak occur” to identify the visual evidence of the leak.
	The subsection “Was the Failure a Result of…” should have a choice of “Unknown” or “Other” since the cause may never be known.	PR21. PHMSA is deleting that subsection.
	Operators should be able to file Part F throughout the year	PR22. Operators will be able to file the new form for Mechanical Fitting failures throughout the year.
	Under "Location of Leak" replace "Pull Out" with "Leak at Separation of Pipe and Coupling." (more appropriate and in line with other	PR23. PHMSA has revised the Location of Leak section as detailed above.

	descriptions.)	
	Annual report should only contain summary data	PR24. Part F is now on its own form.

Regs Text from Mech Fitting Rule

PART 191

A new § 191.12 is added to read as follows:

§ 191.12 Distribution Systems: Mechanical Fitting Failure Reports

Each mechanical fitting failure, as required by § 192.1009, must be submitted on a Mechanical Fitting Failure Report Form PHMSA F 7100.1-2. An operator must submit a mechanical fitting failure report for each mechanical fitting failure that occurs within a calendar year not later than March 15 of the following year (for example, all mechanical failure reports for calendar year 2011 must be submitted no later than March 15, 2012). Alternatively, an operator may elect to submit its reports throughout the year. In addition, an operator must also report this information to the state pipeline safety authority if a state exercises jurisdiction over the operator's pipeline.

PART 192

Section 192.1009 is revised to read as follows:

§ 192.1009 What must an operator report when a mechanical fitting fails?

(a) Except as provided in paragraph (b) of this section, each operator of a distribution pipeline system must submit a report on each mechanical fitting failure, excluding any failure that results only in a nonhazardous leak, on a Department of Transportation Form PHMSA F 7100.1-2. The report(s) must be submitted in accordance with § 191.12.

(b) The mechanical fitting failure reporting requirements in paragraph (a) do not apply to the following:

(1) Master meter operators;

(2) Small LPG operator as defined in § 192.1001; or

(3) LNG facilities.