GPTC
Guide for Gas Transmission and Distribution Piping Systems

Marti Marek
GPTC Chair
• History
  – The Gas Piping Technology Committee
    • Formed late 1960s
    • OPS developing performance-based regulations
    • OPS looking for “best practices”
    • Gas Piping Standards Committee
    • First “Guide” published same year as regulations, 1970

“Guide for Gas Transmission and Distribution Piping Systems”
• Who is GPTC?

  – Gas Industry
     Distribution
     Transmission
     Manufacturing

  – Gas Industry Regulators
     State
     Federal

  - NTSB

  - General Interest
Who is GPTC?
• Who is GPTC?
  – American National Standards Institute accredited – GPTC Z380 committee
    • Consensus process
    • Technically based
    • Independent
    • Members represent their profession
What does GPTC do?

- Writes guidance for complying with Parts 191 & 192 (the “Guide”)
- Petitions PHMSA for Code changes
- Comments on Notices of Proposed Rulemaking
• About the Guide
  – “How to” guidance
  – Advisory – does not restrict other methods of compliance
  – Recognizes system and operator diversity
• Today’s topics
  – Beginning sections
  – How guidance is created
  – Guide structure
  – Editorial conventions
  – Things to look out for
  – I want something changed
• Contents
  – Quick reference for changes
  192.383 Excess flow valve installation
Preface Caution!

- Guide material may not be adequate under all conditions
- Should not restrict operator from using other methods to comply
- Does not ensure that operator is automatically in compliance
- Some states have additional requirements
• History

• Forward
  – Interpretations/revisions to the Guide
  – Interpretations/revisions to the Regulations

• PHMSA Letter
• Disclaimers
• Editorial Conventions
• GPTC Membership List
• Historical Reconstruction
• Historical Record of Amendments
## HISTORICAL RECONSTRUCTION OF PART 191

<table>
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<tr>
<th>Part 191 Section</th>
<th>Effective Date of Original Version if other than 2/09/70</th>
<th>Amendments (if any)</th>
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### HISTORICAL RECORD OF AMENDMENTS TO PART 191

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<th>Amdt 191-</th>
<th>Subject</th>
<th>Vol FR Pg#</th>
<th>Published Date</th>
<th>Docket or RIN No.</th>
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<td>(OPS-2)</td>
<td>Leak Reporting Requirements</td>
<td>35 FR 317</td>
<td>01/08/70</td>
<td>OPS-2</td>
<td>02/09/70</td>
<td>Original Issue</td>
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<td>Leak Reporting Requirements</td>
<td>36 FR 7507</td>
<td>04/21/71</td>
<td>OPS-2</td>
<td>04/20/71</td>
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<td>Elimination of Annual Report Requirement for Small LPG Distribution Systems</td>
<td>37 FR 1172</td>
<td>01/26/72</td>
<td>OPS-17</td>
<td>01/26/72</td>
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• How guidance is created
  – Transaction initiated in response to
    • Rulemaking
    • NTSB reports
    • Member request
    • Public request
    • PHMSA/NAPSR request
• How guidance is created
  – Transaction assigned to a task group
  – Organized in broad categories
    • Damage Prevention & Emergency Response
    • Plastics
    • Design
    • O&M/Operator Qualification
    • IMP/Corrosion
• How guidance is created
  – Task Group creates ad hoc group
    • Writes draft
  – Task Group approves
  – Three Divisions review and approve
    • Distribution
    • Transmission
    • Manufacturing
  – Main Body letter ballot
  – Public Comment
• Guide structure
  – Code language
  – Historical Amendment list
  – Guide material

  – Appendices
    • 191 – 7
    • 192 – 26
• Appendices
  – Guide Material Appendix G-192-X
  – GMA G-192-X
  – X does not designate Code section
    • DIMP GMA G-192-8
    • Gas leakage guidelines GMA G-192-11
  – Check Table of Contents
• Editorial conventions
  – “Includes” does not limit any list to the items presented
  – “Includes” means “includes but not limited to”
  – A list is not intended to set a minimum requirement
  – “Should” means not mandatory
  – “Required” means the Code says you must
• Editorial conventions
  – No guide material necessary
    • The regulation is self-explanatory
  – No guide material available at present
    • Hasn’t been developed or
    • Not determined yet if needed
  – This guide material is under review following Amendment XXX
    • Currently reviewing
• Things to look out for
  – “Cautionary Notes” e.g. Subpart N
    “Guide material in Subpart N is written specifically for the Regulations as adopted in Amendments 192-85, 192-90 and 192-100. Operators are advised that provisions in the Pipeline Safety Act of 2002 and Office of Pipeline Safety protocols for inspection need to be considered in their compliance with operator qualification.”
• Things to look out for
  – “Cautionary Notes” e.g. Subpart N
  – Latest revision may be out of date
• I want something changed
  – Regulations – write PHMSA
  – Guidance – write GPTC
  – See the Forward for contact info
• Where are we now?
  – DIMP Guidance published and available
  – www.AGA.org (Publications)
    • DIMP Appendix $49
    • Entire Guide $430
• GPTC
  – Meets three times a year
  – Always looking for knowledgeable members
  – Welcomes visitors

• Next meeting
  – July 12 – 13, Washington DC
City Center
Questions?