

From: [Sara Lyons](#)
To: [Ashley Horton](#)
Subject: FW: [EXTERNAL] RE: GPTC Question - Basis of leak classification and action criteria (Jackson MS - PLD24FR003)
Date: Tuesday, September 24, 2024 10:40:08 AM

FYI

From: Escobar, Luis [REDACTED]
Sent: Tuesday, September 24, 2024 10:14 AM
To: Sara Lyons [REDACTED]; Lu, Andrew [REDACTED]
Cc: Elena Bozhko [REDACTED]; Chichester, Alan [REDACTED]; Seto, Manson [REDACTED]
Subject: RE: [EXTERNAL] RE: GPTC Question - Basis of leak classification and action criteria (Jackson MS - PLD24FR003)

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Sara,

Circling back now that my out of office, in-person meetings have concluded. I've heard back from multiple long-time GPTC members who were able to search their personal and company libraries.

Findings:

Guide Material Appendices G-192-11 & 11A go back to before 1990. A search of the ANSI B31.8 archives found the leak classification tables appearing in the 1982 edition under Appendix M, potentially for the first time (see attachments). It's possible that they were in the previous edition (1975), but the records that far back are a little patchy.

Please let me know if that suffices or if you'd still like me to arrange a Teams meeting with everyone. I think the earliest we could schedule one is the week of October 15th since I have UL standards meetings next week and then we have our AGA Technical Committee meetings the following week.

Thank you,
Luis

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Luis Escobar | Director, Energy Standards

[American Gas Association](#)

400 N. Capitol St., NW | Washington, DC | 20001

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

From: Sara Lyons [REDACTED]
Sent: Friday, September 6, 2024 4:27 PM
To: Escobar, Luis [REDACTED]; Lu, Andrew [REDACTED]
Cc: Elena Bozhko [REDACTED]; Chichester, Alan [REDACTED]; Seto, Manson [REDACTED]
Subject: RE: [EXTERNAL] RE: GPTC Question - Basis of leak classification and action criteria (Jackson MS - PLD24FR003)

Hi Luis,

Thank you for following up on this question. If they are able to find the reference, email would be great. If your long-term members have context to add that would warrant a meeting, perhaps we can find a time that works for everyone in a few weeks?

I appreciate your assistance with this.

-Sara

From: Escobar, Luis [REDACTED]
Sent: Friday, September 6, 2024 3:37 PM
To: Sara Lyons [REDACTED]; Lu, Andrew [REDACTED]
Cc: Elena Bozhko [REDACTED]; Chichester, Alan [REDACTED]; Seto, Manson [REDACTED]
Subject: RE: [EXTERNAL] RE: GPTC Question - Basis of leak classification and action criteria (Jackson MS - PLD24FR003)

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Sara,

I've been spoken with some of our long-term members and it appears that the leak classification tables have been in the Guide since at least the early 1980s. A couple of our members have some information on the source from before that and have let me know they'll be able to dig it up over the weekend.

Let me know if you would prefer to hop on a call with them or if me emailing you what they

come up with will suffice.

Thank you,
Luis

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Luis Escobar | Director, Energy Standards

[American Gas Association](#)

400 N. Capitol St., NW | Washington, DC | 20001

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From: Escobar, Luis [REDACTED]

Sent: Thursday, September 5, 2024 10:08 AM

To: Sara Lyons [REDACTED]; Lu, Andrew [REDACTED]

Cc: Elena Bozhko [REDACTED]; Chichester, Alan [REDACTED]; Seto, Manson [REDACTED]

Subject: RE: [EXTERNAL] RE: GPTC Question - Basis of leak classification and action criteria (Jackson MS - PLD24FR003)

Hello Sara,

The Leak Guidance portion of the GPTC has been revised since the 2018 edition. Please use the attached document which is the most recent version (2022 edition of the Guide with Addendum 4 incorporated).

As for the basis for the guidance, I reached out to our leadership to get some background information. The guidance has been in the Guide for at least 20 years. They've given me some current members and alumni who may be able to help with information from before then. I've reached out to them to see if they can shed any light on it.

Would you like for me to try to organize a call with you and our members who may have more knowledge about this?

Thank you,
Luis

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Luis Escobar | Director, Energy Standards

[American Gas Association](#)

400 N. Capitol St., NW | Washington, DC | 20001

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From: Sara Lyons [REDACTED]
Sent: Wednesday, August 28, 2024 11:17 AM
To: Lu, Andrew [REDACTED]
Cc: Elena Bozhko [REDACTED]; Chichester, Alan [REDACTED]; Seto, Manson [REDACTED]; Escobar, Luis [REDACTED]
Subject: [EXTERNAL] RE: GPTC Question - Basis of leak classification and action criteria (Jackson MS - PLD24FR003)

Thanks Andrew and all.

Understand about the copyright and we'll go through our normal process for that, if needed. We're actually interested in the basis for the information contained in the GPTC guide table, specific to leak classification and action criteria. Perhaps it would be best to discuss that request with Luis?

Best,
-Sara

From: Lu, Andrew [REDACTED]
Sent: Wednesday, August 28, 2024 11:10 AM
To: Sara Lyons [REDACTED]
Cc: Elena Bozhko [REDACTED]; Chichester, Alan [REDACTED]; Seto, Manson [REDACTED]; Escobar, Luis [REDACTED]
Subject: RE: GPTC Question - Basis of leak classification and action criteria (Jackson MS - PLD24FR003)

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Hi Sara.

Attached is the information you're seeking from the GPTC Guide. While we're obviously happy to share any information from GPTC with the NTSB, please keep in mind that the guidance is actually considered "proprietary" because GPTC sells its Guide Material in order to cover its operating costs. So if NTSB intends to incorporate some of the attached information in an accident investigation, or some other report, it would be best if you received permission from the GPTC first.

I have copied Luis Escobar on this email for two reasons: 1) Luis – please verify the version I have attached is still the **most Current version** since it is from the 2018 guide. (I don't know if anything has been revised in the 2023 version which I don't have access to); and 2) For his awareness, as the GPTC Administrator. Any request for incorporation of this information should be sent to Luis and not me. A reminder that GPTC is an independent group and is not an AGA committee... we are only the secretariat.

Thanks all.

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Andrew Lu | Vice President, Safety, Operations & Engineering

[American Gas Association](#)

400 N. Capitol St., NW | Washington, DC | 20001

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From: Sara Lyons [REDACTED]

To: Lu, Andrew [REDACTED]

Cc: Elena Bozhko [REDACTED]

Subject: [EXTERNAL] GPTC Question - Basis of leak classification and action criteria (Jackson MS - PLD24FR003)

Good morning, Andrew,

I'd like to request background information on the Leak Classification and Action Criteria in the GPTC guide on a relatively short turnaround for our ongoing investigation in Jackson, MS. Can you point me to the best person to request this information from?

Thank you,
-Sara

Sara Lyons, P.E., Chief, Pipeline Investigations Branch
Office of Railroad, Pipeline and Hazardous Materials Investigations
National Transportation Safety Board
490 L'Enfant Plaza East, SW, Washington, DC 20594

