

December 2, 2008

TO: Missouri Natural Gas Operators

SUBJECT: Winter Icing and Other Situations that May Adversely Affect Pressure-Regulating and/or Relieving Equipment

In the past, Missouri has experienced some natural gas incidents, as well as, non-reportable incidents that involved an over-pressure condition of downstream fuel line piping that was caused by the accumulation of ice on residential service regulator equipment. The purpose of this letter is to remind all Missouri Natural Gas Operators to be aware of possible situations or scenarios that may be conducive to ice build-up on pressure regulating and relieving equipment during the winter months.

Some of the commonalities of these natural gas incidents involved a roof overhang that was directly above a natural gas meter set and no guttering was attached to the overhang to carry the water away, or the gutter was blocked with leaves and debris. Also, the majority of the gas meters had service regulators in which the breather vent screen assembly was positioned above the top of the meter casing (middle-mount or angle-style regulator). One of the non-reportable incidents involved an outside dryer vent that was located behind a gas meter. Lint from the dryer vent had blocked a portion of the regulator's breather vent screen area and acted as a wick that gathered moisture when freezing precipitation occurred. Another commonality was that significant amounts of precipitation and below-freezing temperatures over a period of several days contributed to the icing problem.

The Staff is asking that all operators discuss and review this possible safety issue with Service Department personnel and Meter Readers that typically see natural gas meter set installations. If an operator has experienced any type of pressure regulating and/or pressure relieving problem that was attributed to ice build-up, that has either caused a gas outage, or an over-pressure condition of the downstream fuel line piping, investigation of these types of equipment failures would be required by 4 CSR 240-40.030(12)(L) in order to minimize the possibility of a recurrence. Measures might include moving the natural gas meter set to a more favorable location or providing some type of regulator shield/cover to divert the water in an effort to prevent the formation of ice directly on the service regulator and/or pressure relieving device.

Sincerely,

RRL; GW

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