





- ANPRM Advance Notice of Proposed Rulemaking
 - Used to gather information (non-mandatory)
- NPRM Notice of Proposed Rulemaking
 - Almost always required Defines intent and scope
- SNPRM Supplemental Notice of Proposed Rulemaking



- FR Final Rule
 - Implementation date, 30 90 days depending on significance of regulation
- DFR Direct Final Rule
 - Used for non-controversial issues



- Alert Notices a notice of a situation of immediate safety concern
- Advisory Bulletins an advisory not of immediate safety concern
 - matters that have potential to become safety or environmental risks



Post Accident Drug and Alcohol Testing

- Recommendation in the NTSB San Bruno final report
- Conduct post-accident drug and alcohol testing of all potentially involved personnel despite uncertainty of the circumstances of the accident



- Covered employees include:
 - Operator and contractor employees performing operations, maintenance, or emergency response functions
 - Emergency responders, pressure control technicians, temp employees, and control room operators

ADB - 2012 - 02 February 23, 2012

- Review and update as necessary, plans and procedures governing post-accident drug and alcohol testing, and train personnel
- §§ 199.105, 199.225(a), 199.221, 199.103(a) and 199.223
 - Performance cannot be completely discounted as contributing factor
 - Two hour window, or maintain file while not done



ADB - 2012 - 0303 March 6, 2012

Driscopipe 8000 - High Density Polyethylene Pipe

- Advising operators using Driscopipe 8000 of the potential for material degradation
 - Contact manufacturer for updates
 - Determine if their systems susceptible to degradation
 - PHMSA cannot provide specific guidance on how to address issue
 - Conservative approach to discovery and repair of systems



ADB - 2012 - 05 March 23, 2012

Cast Iron Pipe Supplementary

- Update of two prior Alert Notices (ALN-91-02; October 11, 1991 and ALN-92-02; June 26, 1992) covering the continued use of cast iron pipe in natural gas distribution pipeline systems.
- Remind operators that these alert notices remain relevant



Pipeline Damage Prevention Programs

 Establish criteria and procedures for determining the adequacy of state pipeline excavation damage prevention law enforcement programs

Comments under review NPRM being developed



Verification of Records Establishing MAOP and MOP

- For all pipeline segments, assure that all MAOP and MOP are supported by records that are:
 - Traceable records
 - Verifiable records
 - Complete records



ADB - 2012 - 07 June 9, 2012

Mechanical Fitting Failure Reports

- •§192.1009 requires operators of all gas distribution pipeline facilities to report the failure of any mechanical fitting that results in a hazardous leak on a Mechanical Fitting Failure Report Form (PHMSA F 7100.1-2)
- •Report is required for all failures regardless of the material composition, type, manufacturer, or size of the fitting.



ADB - 2012 - 07 June 9, 2012

Mechanical Fitting Failure Reports

- Part C, Question 15 (Apparent Cause of Leak) on forms has two potential options for a failure from incorrect installation of the mechanical fitting.
 - "Material or Welds/Fusions" with a subcategory of "Construction/Installation Defect."
 - "Incorrect Operation."



ADB - 2012 - 07 June 9, 2012

Mechanical Fitting Failure Reports

- PHMSA prefers that failures resulting from an installation defect be reported using "Incorrect Operation" as the apparent cause.
- It is PHMSA's intent to capture failure data under the "Material or Welds/Fusions" leak cause category that is specific to manufacturer, fabrication, material, and design defects
- Added unique identifier for each report

ADB 2012 - 08 July 31, 2012 Inspection/Protection of Pipeline Facilities after Railway Accidents

- Reminder to inspect and protect pipeline facilities following railroad accidents that occur in ROWs.
- Encourage as part of public awareness to inform rail operators and emergency response officials of the benefits of 811 to notify underground utilities of incidents in their vicinity



Communication during emergency situations

 NTSB recommendation that operators ensure control room operators immediately and directly notify the appropriate public safety access point (PSAP) when a possible rupture or other pipeline problem is indicated



Communication during emergency situations

- Reminder to maintain informed relationship
- Call all appropriate PSAP's with indications of a pipeline emergency
- Immediate contact and conversation will facilitate timely, effected, and coordinated response.



Using Meaningful Metrics in Conducting Integrity Management Program Evaluations

 Remind operators of gas transmission and hazardous liquid pipeline facilities of their responsibilities, under Federal integrity management regulations, to perform evaluations of their integrity management programs using meaningful performance metrics.



Integrity Management Program Evaluations

- Effective performance evaluation includes:
 - Well defined scope, objectives and frequency of evaluation
 - Clear performance goals and objectives to measure the effectiveness of key integrity activities
 - Clear assignment of responsibility for implementation



December 5, 2012 Letter

Director, Office of Secretary of Transportation, Office of Drug and Alcohol Policy and Compliance Department of Transportation

State initiatives have no bearing on the Department of Transportation's regulated drug testing program. The Department of Transportation's Drug and Alcohol Testing Regulation – 49 CFR Part 40 – does not authorize the use of Schedule I drugs, including marijuana, for any reason



ADB 2012 -11 December 21, 2012

Reporting of Exceedances of Maximum Allowable Operating Pressure

Gas Transmission Operators

Pipeline Safety, Regulatory Certainty and Job Creation Act of 2011, Section 23(a)

If pipeline pressure exceeds MAOP plus the build-up allowed for operation of pressure-limiting or control devices, the owner or operator must report the exceedance to PHMSA on or before the fifth day following the date on which the exceedance occurs.

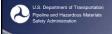


Telephonic Notification Time Limit to National Response Center (NRC)

Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 Section 9 requires PHMSA to require a specific time limit for telephonic or electronic reporting of pipeline accidents and incidents.

ADB 2013 -01 January 30, 2013 Telephonic Notification Time Limit to National Response Center (NRC)

- Operators should contact the NRC
 - Within one hour of confirmed discovery of a pipeline incident
 - File additional telephonic reports if there are significant changes in the number of fatalities or injuries, product release estimates or the extent of damages.



ADB-2013-0220 July 12, 2013

Potential for Damage to Pipeline Facilities Caused by Severe Flooding

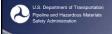
- Continuing surveillance requirements §192.613
- •Severe flooding can adversely affect the safe operation of a pipeline.
- Direct resources in a manner that will enable determination of the potential effects of flooding
- Urged to take actions to prevent and mitigate damage to pipeline facilities and ensure public and environmental safety in areas affected by flooding



ADB-2013-62203 July 12, 2013

Potential for Damage to Pipeline Facilities Caused by Severe Flooding

- •If a pipeline has suffered damage, is shut-in, or is being operated at a reduced pressure as a precautionary measure due to flooding, the operator should advise the appropriate pipeline safety authority before returning the line to service, increasing its operating pressure, or otherwise changing its operating status.
- •A Safety Related Condition as prescribed in §§ 191.23 and 195.55 may also be required.



ADB-2013-6323 July 18, 2013

Reminder of Requirements for Utility LP-Gas and LPG Pipeline Systems

Remind owners/operators of liquefied petroleum gas (LPG) and utility liquefied petroleum gas (utility LP-Gas) plants that although they must follow the American National Standards Institute/National Fire Protection Association (ANSI/NFPA) standards 58 or 59, they must also follow certain sections and requirements of Part 192.



ADB-2013-8323 October 31, 2013

Reminder of Requirements for Utility LP-Gas and LPG Pipeline Systems

Updated bulletin with application section of Part 192 an operator needs to follow, particularly because ANSI/NFPA 58 and 59 do not specifically address these parts.

Construction, Valves, Operations, OQ and DIMP



Notice of Proposed Rulemaking August 1, 2013

Public comment on applying Class locations and IMP requirements beyond HCAs

Add class locations
Eliminate class locations and design factors
Testing of transmission pipelines

Repairs of transmission pipeline

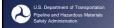
Comments under review



Notice of Proposed Rulemaking August 16, 2013

Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments

Updating 21 editions of currently referenced standards in Parts 192, 193, and 195
Adding two new standards
Changing IBR from table to list
Miscellaneous edits to address changes



Notice of Proposed Rulemaking August 16, 2013

Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments

New standard API RP 5LT – Recommended Practice for Truck Transportation of Line Pipe (first edition)

New Standard ASTM D 2513-09a except for Section 4.2 which addresses reworked material



Notice of Proposed Rulemaking August 16, 2013

Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments

Not incorporating by reference:

- API RP 1162 Public Awareness (2nd edition)
- API Standard 653 Tank Inspection (4th edition), but leaving as 3rd edition



Notice of Proposed Rulemaking August 16, 2013

Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments

Removing §192.283(a)(1)(i) referring to Paragraph 8.9 of ASTM D2513-99 Reference in error



Notice of Proposed Rulemaking August 16, 2013

Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments

Removing §199.111 because of conflict bewteen Part 199 and 49 CFR Part 40 Adequately covered by 49 CFR Part 40

Comments by October 15, 2013



ADB-2013 0420 August 28, 2013

Recall of Leak Repair Clamps due to Defective Seal

T.D. Williamson issued recall on June 17, 2013 for Leak Repair Clamp (LRC)

Covers all LRCs of any pressure class or size Manufactured between 9/2002 and 8/2012 Range in size from 2" to 48"

ANSI Pressure Classes of 150, 300, 400, 600, and 900

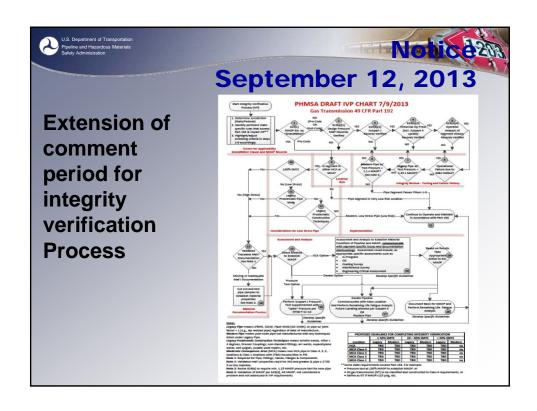


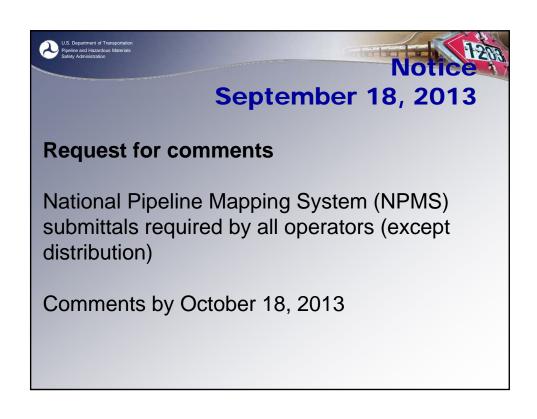
ADB-2011-04203 August 28, 2013

Recall of Leak Repair Clamps due to Defective Seal

T.D. Williamson conducted study to identify problem, determine repair options, and evaluate fitness of existing LRCs.

Stop using TDW LRCs and contact TDW immediately







Changes to 49 CFR 190 - Pipeline Safety Programs

- Increases in both civil and criminal penalties (\$200,000)
- Investigations, response options, hearings, addresses and contact information,
- Other administrative procedures

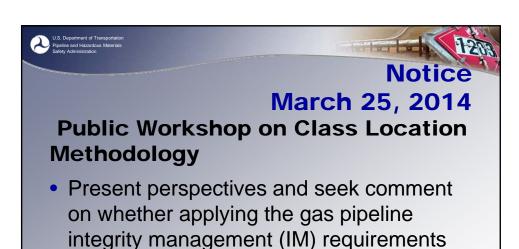


Random drug rate to remain at 25% for calendar year 2014

- 2012 positive drug test rate was <1%
- Reminder to submit information through PHMSA portal



- Review and update oil spill response plans and contracts to ensure availability of necessary response resources to a worst case discharge if more than one significant incident were to occur simultaneously.
- Review response times
- Carefully consider each incorporated document used in plan



beyond high consequence areas would

mitigate the need for class location

requirements



 Comments on proposed revision of two forms, PHMSA F 1000.1--OPID Assignment Request and PHMSA F 1000.2--Operator Registry Notification



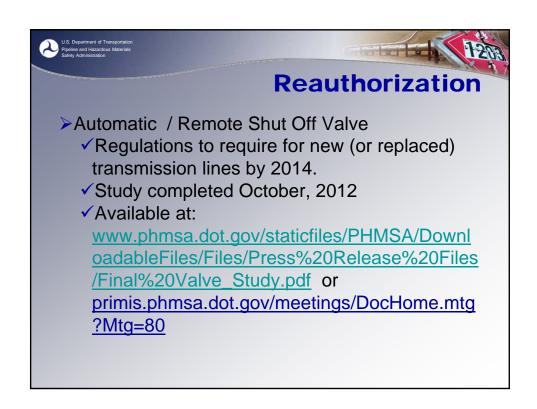


- PHMSA F 1000.2--Operator Registry Notification
 - Revise instruction for clarity
 - -Align commodity choices
 - Adding construction notification choices



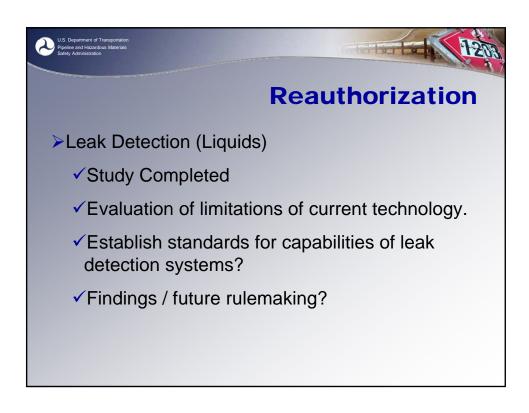


- ✓ Maximums increased to \$200,000 and \$2,000,000. (Final Rule)
- > HCA Emergency Response Time
 - ✓ Comptroller General report due by 2013.



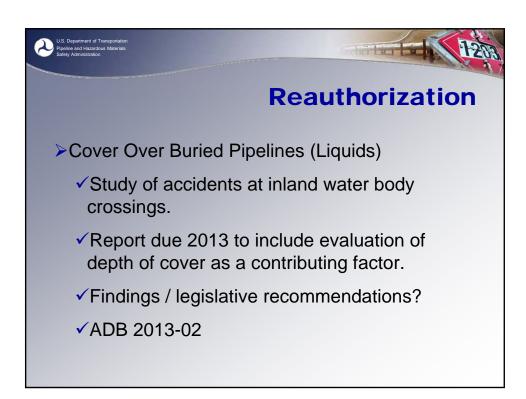


- ➤Integrity Management (ANPRM)
 - ✓ Expanding IMP requirements outside HCA's
 - ✓ Report due 2014 to include evaluation of public safety enhancement, risk reduction and incremental cost factors.
 - √Findings / future rulemaking?





- >Accident and Incident Notification
 - ✓ Post discovery, one hour maximum time to notify NRC. (ADB-2013-01)
- >Study of Transportation of Diluted Bitumen
 - √Report completed
- ➤ Excess Flow Valves
 - √NTSB recommendation.
 - ✓ Regulations for multi-family dwellings?





- MAOP Records Verification (ADB-11-01 and ADB-2012-06)
 - ✓ Complete by mid 2012 for Class 3 & 4 locations and Class 1 & 2 HCA's.
 - ✓ Identify all pipelines with insufficient records by mid 2013.
 - ✓ Regulations for confirmation of material strength of transmission lines located in HCA's



- MAOP exceedances Section 23
 - For gas transmission pipelines, if the MAOP exceeds the build-up allowed for operation of pressure-limiting or control devices, the owner or operator shall report the exceedance to the Secretary and appropriate State authorities on or before the 5th day following the date on which the exceedance occurs. (ADB 2012-11)



Incorporated by Reference (IBR)

- Section 24 of Reauthorization addresses issue of incorporated by reference documents
- Public Meeting Incorporating by Reference consensus standards unless available free of charge to the public on the Internet
 - July 13, 2012



PHMSA negotiated agreements with:

- American Petroleum Institute (API)
- American Gas Association (AGA)
- American society for Testing and Materials (ASTM)
- Gas Technology Institute (GTI)
- Manufacturers Standardization Society of Valves and Fittings Industry, Inc. (MSS)
- NACE
- National Fire Protection Association (NFPA)

Should or May Shell or Must

Incorporated by Reference documents, "should" is "must" unless written justification why not practicable/necessary for safety

