RECENT EVENTS AND THE ROAD TO REAUTHORIZATION
Contact Information

Wayne St. Germain
Pipeline Safety Specialist
PHMSA Training and Qualifications
405-954-8575
Wayne.stgermain@dot.gov
Personal Electronic Device Related Distractions

- Remind owners and operators pipeline facilities of the increased risks associated with the use of personal electronic devices (PEDs) by individuals performing operations and maintenance activities on a pipeline facility.

- Recommend that operators integrate into their written procedures for operations and maintenance appropriate controls regarding use of PEDs, and provide guidance and training about the risks associated with PEDs.
Reauthorization

- PIPES 2006
- Scheduled reauthorization in 2010

THEN..........................
• Reauthorizations hearings
  – Eight hearings
    • 5 in 2010
    • 3 in 2011
  – Data requests
2010 Incidents

Third Party Damage

- Cleburne and Darrouzett, Texas 6/10
- Thompson, Georgia 7/10
Lessons Learned

- Damage Prevention and locating
- Line Marking
- Public Awareness
Liquid Accidents

- Marshall, MI 6/10
- Red Butte Creek, UT 6/10, 11/10
- Chicago, IL 9/10
Marshall, MI

- Reporting
- IM
- CRM
- Emergency Response
- Waiting NTSB report
Red Butte Creek, UT

- Damage Prevention and One Call
- Electrical isolation
- Patrolling and Leak Detection
Red Butte Creek, UT

- Second Release
Red Butte Creek, UT

- O&M procedures – particularly during cold weather
- Leak detection
- Valve inspection and maintenance
Two-inch diameter hole was found in the bottom of the pipe directly above a water main that passes perpendicular to the pipe.

Two holes were found in the top of the water main.

Fault Current issue.
San Bruno  September 2010
San Bruno
Emergency Preparedness Communications

— Operators need to share emergency response plans with emergency responders to ensure prompt, effective, and coordinated response to emergencies involving a pipeline facility

— Requirement of both emergency response and public awareness
Establishing MAOP/MOP using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention and Mitigation

- Reminding operators to perform detailed risk analyses that integrate accurate data and information from their system, especially when calculating MAOP, and utilizing risk analyses in the identification of appropriate assessments, and preventative and mitigative measures.
NTSB Report – San Bruno
September, 2011

- Secretary of Transportation – 4
- PHMSA – 13
- Governor of California – 1
- California PUC – 2
- PG&E – 8
- AGA and INGAA – 1

Far reaching in breadth and depth
Final Report provided recommendations to PHMSA

- Provide system-specific information to the emergency response agencies, including pipe diameter, operating pressure, product transported, and potential impact radius.
- Ensure control room operators immediately and directly notify the 911 emergency call center(s)
Require all operators equip their supervisory control and data acquisition systems with tools to assist in recognizing and pinpointing the location of leaks, including line breaks.

Amend §192.935(c) to directly require that automatic shutoff valves or remote control valves in HCAs and class 3 and 4 locations.
• Amend §§ 199.105 and 199.225 to eliminate operator discretion with regard to testing of covered employees. Require D&A testing of each employee whose performance either contributed to the accident or cannot be completely discounted as a contributing factor to the accident.
– Require that all natural gas transmission pipelines be configured so as to accommodate in-line inspection tools, with priority given to older pipelines.

– Delete grandfather clause (§192.619(c)) and require all pre-1970 gas transmission lines to be hydrotested.
• Revise integrity management inspection protocol to
  (1) incorporate a review of meaningful metrics;
  (2) require auditors to verify that the operator has a
       procedure in place for ensuring the completeness
       and accuracy of underlying information;
  (3) require auditors to review all reported IM
       performance measures and compare the leak,
       failure, and incident measures to the operator's
       risk model; and
  (4) require setting performance goals for pipeline
       operators at each audit and follow up on those
       goals at subsequent audits.
• Develop and implement standards for IM and other performance-based safety programs that require operators of all types of pipeline systems to regularly assess the effectiveness of their programs using clear and meaningful metrics, and to identify and then correct deficiencies; and make those metrics available in a centralized database.
Work with state public utility commissions to (1) implement oversight programs that employ meaningful metrics to assess the effectiveness of their oversight programs and make those metrics available in a centralized database, and (2) identify and then correct deficiencies in those programs.
Final Rule
Amdt.192-114
August 11, 2010

Updates to Referenced Technical Standards and Miscellaneous Edits

- Updated some incorporated by reference documents
- Moved and added definitions
- Changes to Subpart F – Joining by other than Welding
- Transmission repair procedures IM clarifications
Updates to Pipeline and LNG Reporting Requirements

- Incident definition
- IM reporting requirements
- Operator ID numbers
Fairport Harbor, January, 2011

- Multiple Fires
- No injuries
Village of Fairport Harbor

- A series of fires that occurred in the Village of Fairport Harbor, Ohio on January 24, 2011 beginning at approximately 6:37 a.m. Eleven homes were severely damaged,

- 150 homes required appliance repair or replacement resulting from what was identified as a major gas leak. Thirteen local fire departments responded; estimated property damage of the incident was nearly $1,300,000. Operator provided telephone notice of the incident to the chief of gas pipeline safety, at approximately 9:30 a.m. on January 24, 2011.
Fairport Harbor

- Double regulator failure off high pressure transmission line
- Additional inspections
- Add relief valve to setting
Allentown, PA 2-11
ADB - 2012 – 05
Cast Iron Pipe (Supplementary Advisory Bulletin)

• Advising to owners and operators of natural gas cast iron distribution pipelines and state pipeline safety representatives

• update of two prior Alert Notices (ALN-91-02; 10/11/91 & ALN-92-02; 6/26/92)
ADB - 2012 – 05
Cast Iron Pipe (Supplementary Advisory Bulletin)

• urges owners and operators to conduct a comprehensive review of their cast iron distribution pipelines and replacement programs and accelerate pipeline repair, rehabilitation and replacement of high-risk pipelines
ADB - 2012 – 05
Cast Iron Pipe (Supplementary Advisory Bulletin)

• requests state agencies to consider enhancements to cast iron replacement plans and programs
• alerts owners and operators of the pipeline safety requirements for the investigation of failures.
ADB - 2012 – 05
Cast Iron Pipe (Supplementary Advisory Bulletin)

• Also gives as information the latest survey and reporting requirements of cast iron pipelines required by the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011
Allentown, PA 2-11
Liquid Accidents

- Yellowstone River, Montana
  7/11
• **ADB-11-02, February 3, 2011**
  – Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

• **ADB-11-04, July 27, 2011**
  – Potential Damage to Pipeline Facilities Caused by Severe Flooding

• **ADB-11-05, September 1, 2011**
  – Potential for Damage to Pipeline Facilities Cause by Hurricanes
Cupertino, CA  8-11
Aldyl “A”

- Had $2 million put in rate base to study Aldyl “A” in 2009
- Never conducted the Study.
- Had several Failures on Aldyl “A” piping system.
- Keys to DIMP?
Seattle, WA  9-11
Common theme of all four pipe failures

• A separate metallic facility intersected in close proximity to each gas service at each point of failure.
  – All gas services were in close proximity but in no case were touching the intersecting facility.
    – One copper water line
    – One steel water line
    – One below ground oil tank vent line
    – One ductile iron sewer pipe
Safety of Gas Transmission Pipelines

- Requesting comments regarding some changes to Integrity Management (IM) requirements, including
  - adding more prescriptive language
  - other issues related to system integrity should be addressed by strengthening or expanding non-IM requirements
Safety of Gas Transmission Pipelines

- Requesting comments regarding some changes to Integrity Management (IM) requirements, including:
  - HCA definitions
  - ILI requirements
  - Modifying repair criteria
  - Proscriptive requirements for data integration
Safety of Gas Transmission Pipelines

- Requesting comments regarding some changes to Integrity Management (IM) requirements, including
  - Requirements for automatic valves
  - Corrosion control
- Due January 20, 2012
• Expanding the Use of Excess Flow Valves in Gas Distribution Systems to Applications Other Than Single-Family Residences
  - Practicable to implement?
  - Cost factors
  - Use of technical standards and guidance for EFVs

• Comments due March 19, 2012
Miscellaneous Changes to Pipeline Safety Regulations

- National Pipeline Mapping System
- Welding and Welding Operator Definitions
  - Welding and welding operator procedures, qualifications and weld inspection and testing
- Plastic pipe qualifications (15 months)
- Construction inspection by person not involved in construction
Miscellaneous Changes to Pipeline Safety Regulations

- Changes to Subpart J, testing requirements
- Clarification of lateral for odorization requirements
- Alternate MAOP changes

• Comments due by March 6, 2012
The Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011

• Signed January 3, 2012
• Funds programs of the Pipeline and Hazardous Materials Safety Administration (PHMSA) through fiscal year 2015.
• Addresses National Transportation Safety Board recommendations resulting from recent pipeline incidents
Reauthorization

Pipeline Safety, Regulatory Certainty and Job Creation Act (January 3, 2012)

- Doubles maximum fines for safety violations
- New standards for remote closure valves
- Two to three year period to study impact of new regulations regarding leak detection and expansion of HCA’s among others.
Reauthorization

- **Fines**
  - Maximums increased to $200,000 and $2,000,000.

- **Automatic / Remote Shut Off Valve**
  - Regulations to require for new (or replaced) transmission lines by 2014.

- **HCA Emergency Response Time**
  - Comptroller General report due by 2013.
Integrity Management

- 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?
Reauthorization

- Leak Detection (Liquids)
  - Evaluation of limitations of current technology.
  - Establish standards for capabilities of leak detection systems?
  - Findings / future rulemaking?
Reauthorization

- Accident and Incident Notification
  - Post discovery, one hour maximum time to notify NRC.

- Study of Transportation of Diluted Bitumen

- Excess Flow Valves
  - NTSB recommendation.
  - Regulations for multi-family dwellings?
Reauthorization

- MAOP Records Verification
  - 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 by mid 2013.
Reauthorization

- Cover Over Buried Pipelines (Liquids)
  - Study of accidents at inland water body crossings.
  - Report due 2013 to include evaluation of depth of cover as a contributing factor.
  - Findings / legislative recommendations?
2013 Budget

• $67 million increase for PHMSA
  – 150 new employees, including 120 new inspectors
Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators

<table>
<thead>
<tr>
<th>ACTION</th>
<th>Submission Expected</th>
</tr>
</thead>
<tbody>
<tr>
<td>OPID requests</td>
<td>Begins February 1, 2012</td>
</tr>
<tr>
<td>OPID validation</td>
<td>June 30, 2012</td>
</tr>
<tr>
<td>60 day before notifications for 1/1/12 – 3/30/12</td>
<td>January 31, 2012</td>
</tr>
<tr>
<td>60 day before notifications after March 30, 2012</td>
<td>60 days prior to commencement</td>
</tr>
<tr>
<td>60 day after notifications</td>
<td>60 days after event</td>
</tr>
</tbody>
</table>
Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators

- updates to ADB- 2012-01
- On January 27, 2012, the Online Data Reporting System (ODES) became functional for requesting a new OPID.
- PHMSA is entering the pdf versions of OPID request forms into ODES and will notify requestors when the OPID has been assigned
• Master meter and small LPG operators established after December 31, 2011, will be required to obtain an OPID in accordance with §191.22
• 5/1/12 PHMSA will allow these MM/LPG operators to request an OPID.
• Requirement to request an OPID continues to **not apply** to master meter and small LPG operators in existence prior to 12/31/11.
On March 27, 2012, operators will be able to complete the OPID validation process online.

How to submit reports to PHMSA are available at [http://opsweb.phmsa.dot.gov](http://opsweb.phmsa.dot.gov)
Notice
January 18, 2012

Notice of Minimum Annual Percentage Rate for Random Drug Testing.

Minimum random drug testing rate for covered employees will remain at 25 percent during calendar year 2012.
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
ADB - 2012 – 02
Post Accident Drug and Alcohol Testing

• 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
Post Accident Drug and Alcohol Testing

- 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
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
The American Petroleum Institute announced it would provide free online public access to a large group of key industry standards, including a broad range of safety standards.

- 160 standards are be available online, and represent almost one-third of all API standards.
- Will include all that are safety-related or have been incorporated into federal regulation.
Should or May

versus

Shall or Must

Incorporated by Reference documents, “should” is “must” unless documented why not practicable/necessary
Enforcement Guidance

Various enforcement guidance is available at:
http://phmsa.dot.gov/foia/e-reading-room

• Includes O&M, OQ, Corrosion, Public Awareness
PHMSA Information Websites

PHMSA Training and Qualification
http://www.phmsa.dot.gov/pipeline/tq

PHMSA Pipeline Safety Regulations
http://www.phmsa.dot.gov/pipeline/tq/regs

PHMSA Rulemaking
http://www.phmsa.dot.gov/pipeline/regs/rulemaking