PHMSA
Regulatory Updates

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US DOT PHMSA Office of Pipeline Safety
APGA SIF Operations Conference
Wednesday, March 4th 8:50-9:40 AM

Topics Areas for Discussion

- Advisory Bulletin Updates
  - Overview of the 2014 ADBs
  - Quick overview of some 2013 ADBs
- Latest Rules and regulations Updates
- Information Collection Activities
- … And some other Miscellaneous information

Advisory Bulletins (ADB)

http://www.phmsa.dot.gov/pipeline/regs/advisory-bulletin

List of 2014 Advisory Bulletins

- Advisory Bulletins (ADB)
- 2014-05 - Guidance for Meaningful Metrics
- 2014-04 - Guidance for Pipeline Flow Reversals, Product Changes and Conversion to Service
- 2014-03 - Notification(s) required prior to certain construction-related events
- 2014-02 - Lessons Learned from the Marshall, Michigan, Release
- 2014-01 - Guidelines for the Preparation of Part 194 On-shore Oil Spill Response Plans

ADB – 2014-05

Pipeline Safety: Guidance for Meaningful Metrics

PHMSA has noticed …

- Senior Management responsibilities
  - Addressing deficiencies in the program
  - Continuous Improvement of the IM program
- Root cause analysis of Incidents reveal:
  - Management systems and Organizational program deficiencies contribute to pipeline accidents
- Weakness in using Meaningful Metrics

ADB – 2014-05

- Operators need an established method to measure program effectiveness – DIMP provides methodology
- PHMSA developed guidance on the elements and characteristics of a mature program evaluation process that uses meaningful metrics
- Major topic areas addressed in the guidance document include:
  - Establishing Safety Performance Goals
  - Identifying Required Metrics
  - Selecting Additional Meaningful Metrics
  - Metric Monitoring and Data Collection
  - Program Evaluation Using Metrics

ADB-2014-04

Guidance for Pipeline Flow Reversals, Product Changes and Conversion to Service

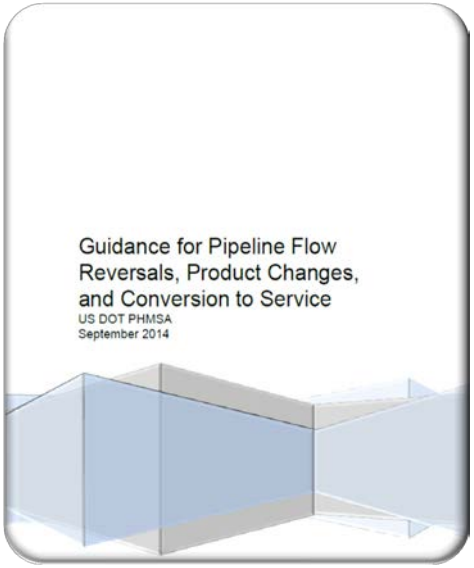
- Alert operators of hazardous liquid and gas transmission pipelines of the potential significant impact flow reversals, product changes and conversion to service may have on the integrity of a pipeline
- Failures on natural gas transmission and hazardous liquid pipelines have occurred after these operational changes.
- This advisory bulletin describes specific notification requirements and general operating and maintenance (O&M) and integrity management actions regarding flow reversals, product changes and conversion to service.

ADB-2014-04

- Operators should take additional actions when these operational changes are made including:
  - The submission of a comprehensive written plan to the appropriate PHMSA regional office regarding these changes prior to implementation.
- Two recent pipeline failures occurred on hazardous liquid pipelines where the flow had been reversed.
- In one instance, Pressure and flow monitoring equipment had not been changed to account for the reversed flow.

ADB-2014-04

- The document addresses flow reversals, product changes and conversion to service individually. The document is located at: http://phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Pipeline/Regulations/GORRPCCS.pdf



ADB-2014-03

- Notification(s) required prior to certain construction-related events - 10 or more miles OR costs $10 million or more.
- Operators to provide the required construction-related notification(s) not later than 60 days. Prior to:
  - Material purchasing and manufacturing;
  - right-of-way acquisition;
  - Construction equipment move-in activities;
  - Onsite or offsite fabrications;
  - or right-of-way clearing, grading and ditching.

ADB-2014-03

191.22(c) Changes. Each operator of a gas pipeline, gas pipeline facility, LNG plant or LNG facility must notify PHMSA electronically through the National Registry of Pipeline and LNG Operators at http://opsweb.phmsa.dot.gov of certain events.

(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:

(i) Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs $10 million or more. If 60 day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;

(ii) Construction of 10 or more miles of a new pipeline; or

(iii) Construction of a new LNG plant or LNG facility.

ADB-2014-02

- Lessons Learned from the Marshall, Michigan, Release.
- NTSB Recommendations from Enbridge Marshall, MI (2012) accident included a finding of probable cause - The rupture and prolonged release were made possible by pervasive organizational failures
- NTSB identified specific deficiencies in three of Enbridge programs:
  - Deficient integrity management procedures
  - Inadequate training of control center personnel
  - Insufficient public awareness and education

ADB-2014-02 - Summary

Pipeline owners and operators are encouraged to:

- Review IM programs for deficiencies and take corrective action
- Consider training control room staff as teams to recognize and respond to emergencies or unexpected conditions.
- Review the effectiveness of their public awareness programs and whether local emergency response teams are adequately prepared to identify and respond to early indications of ruptures.
- Review NTSB recommendations that the NTSB provides to pipeline operators following incident investigations.
- Operators should proactively implement these improvements to their pipeline safety programs

ADB-2013-04

- Recall of Leak Repair Clamps due to Defective Seal
- TDW has deemed its LRCs defective due to the seal contained in every clamp not maintaining adequate pressure causing the clamp to fail.

ADB-2013-04

PHMSA advises hazardous liquid and natural gas pipeline operators to take the following measures:

- TDW asks all customers to stop using the TDW LRCs.
- Return it to TDW and follow up with TDW's recall procedures for the LRC.
- Verify records to determine if a TDW LRC is installed.
- Stop using the TDW LRC immediately.
- TDW Web site: http://www.tdwilliamson.com/Pages/Leak-Repair-Clamp.aspx
- TDW phone number: (800) 828-1988

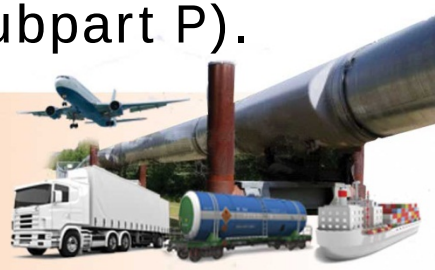
ADB-2013-03

- Reminding owners and operators of liquefied petroleum gas (LPG) and utility liquefied petroleum gas (utility LP-Gas) plants that although they must follow ANSI/NFPA standards 58 or 59, they must also follow certain sections and requirements of Part 192.
- When ANSI/NFPA 58 or 59 (2004) does not address a specific subject, then a conflict has not occurred and the operator must follow Part 192 requirements.

ADB-2013-03

Part 192 covers areas that are not addressed in ANSI/NFPA 58 or 59 (2004). These areas include:

- Inspection requirements for distribution mains (192.305 and 192.307).
- Backfill requirements for installing pipe in a ditch (192.319).
- Underground pipe clearance requirements (192.325).
- Valve requirements for service lines (192.363 and 192.365).
- Continuing surveillance (192.613).
- Public awareness (except for small LP-gas systems) (192.614).
- Operator qualification (except for small utility LP-Gas systems) (Subpart N).
- Distribution Pipeline Integrity Management (Subpart P).



ADB-2013-02

- PHMSA is issuing this advisory bulletin to all owners and operators of gas and hazardous liquid pipelines to communicate the potential for damage to pipeline facilities caused by severe flooding.

ADB-2013-02

1. Evaluate the accessibility of pipeline facilities that may be in jeopardy, such as valve settings, which are needed to isolate water crossings or other sections of a pipeline.

2. Extend regulator vents and relief stacks above the level of anticipated flooding, as appropriate.

3. Coordinate with emergency and spill responders on pipeline location and condition. Provide maps and other relevant information to such responders.

4. Coordinate with other pipeline operators in the flood area and establish emergency response centers to act as a liaison for pipeline problems and solutions.

ADB-2013-02

5. Deploy personnel so that they will be in position to take emergency actions, such as shut down, isolation, or containment.

6. Determine if facilities that are normally above ground (e.g., valves, regulators, relief sets, etc.) have become submerged and are in danger of being struck by vessels or debris and, if possible, mark such facilities with an appropriate buoy and Coast Guard approval.

7. Perform frequent patrols, including appropriate overflights, to evaluate right-of-way conditions at water crossings during flooding and after waters subside. Determine if flooding has exposed or undermined pipelines as a result of new river channels cut by the flooding or by erosion or scouring.

ADB-2013-02

8. Perform surveys to determine the depth of cover over pipelines and the condition of any exposed pipelines, such as those crossing scour holes. Where appropriate, surveys of underwater pipe should include the use of visual inspection by divers or instrumented detection. Information gathered by these surveys should be shared with affected landowners. Agricultural agencies may help to inform farmers of the potential hazard from reduced cover over pipelines.

9. Ensure that line markers are still in place or replaced in a timely manner. Notify contractors, highway departments, and others involved in post-flood restoration activities of the presence of pipelines and the risks posed by reduced cover.

ADB-2013-02

- 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 PHMSA regional office or state pipeline safety authority before returning the line to service, increasing its operating pressure, or otherwise changing its operating status.
- Furthermore, reporting a Safety Related Condition as prescribed in Sec. Sec. 191.23 and 195.55 may also be required.

ADB-2013-01 NRC Notification

- Operators are required to provide telephonic reports of pipeline incidents and accidents to the National Response Center (NRC) promptly (within 1 hour), accurately, and fully communicate the estimated extent of the damages.
- PHMSA is issuing this advisory bulletin to notify, as required by the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011,
- The agency will issue a proposed rule to revise telephonic reporting regulations to establish specific time limits for telephonic or electronic notice of accidents and incidents involving pipeline facilities to the NRC.

Rule Making Process

The following rules are in one of the following stages:

- Advanced Notice of Rulemaking (NPRM)
- NPRM
- Final Rule
- Information Collection Activities

Safety of Gas Transmission and Gathering Lines

NPRM moved past PHMSA - ANPRM Published 8/25/2011

- Expansion of IM requirements beyond HCA's
  - Repair criteria for both HCA and non-HCA areas
- Assessment methods
- Corrosion control
- Gas gathering
- Integrity Verification Process – Pipe of Concern
  - Grandfather pipe
  - Pipe with inadequate records
  - Legacy pipe
  - Pipe tested below 1.1 MAOP

EFV Expansion beyond Single Family Residences

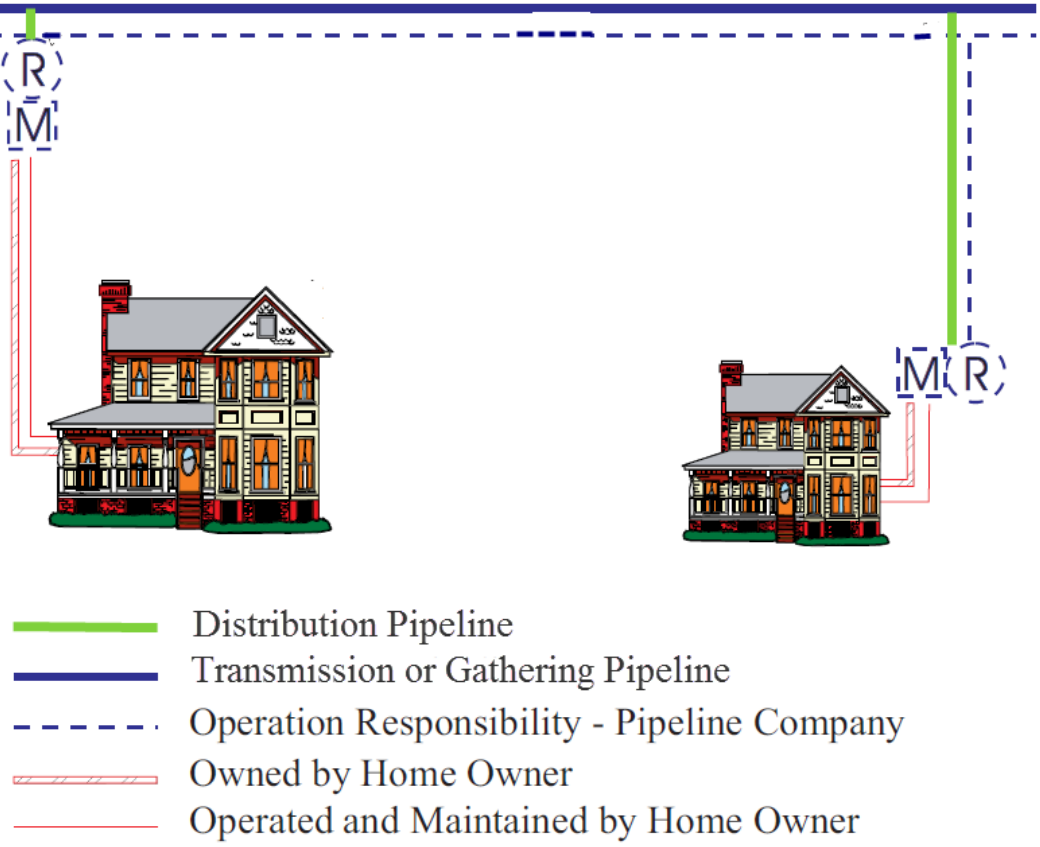
NPRM moved past DOT - ANPRM published 11/25/2011

- Rule will propose to require EFVs for:
  - branched service lines serving more than one single family residence
  - multi-family residential dwellings
  - commercial buildings

Operator Qualification, Cost Recovery and Other Pipeline Safety Proposed Changes

NPRM moved past PHMSA

- This rule will address issues related to:
  - Operator Qualification for new construction
  - Incident Reporting
  - Cost Recovery
  - Assessment methods for HL lines (NACE petition)
  - Renewal process for special permits
  - API 1104 and in-service welding
  - Includes Farm Taps



Farm Taps

- Do the facilities meet the definition of Gathering? No.
- Do they meet the definition of transmission? No.
- If No to both,

Then the facilities are distribution.

The “farm tap” is pipeline upstream of the outlet of the customer meter or connection to the customer piping, whichever is further downstream, and is responsibility of the operator. The pipeline downstream of this point is the responsibility of the customer. Some States require the operator to maintain certain portions of customer owned pipeline. The pipeline maintained by the operator must be in compliance with 49 Part 192.

Treatment of Farm Taps in DIMP

From 192.3 Definitions:

- "Gathering Line means a pipeline that transports gas from a current production facility to a transmission line or main."
- "Transmission line means a pipeline, other than a gathering line, that: (1) transports gas from a gathering line or storage facility to a gas distribution center, storage facility, or large volume customer that is not down-stream from a gas distribution center; (2) operates at a hoop stress of 20 percent or more of SMYS; or (3) transports gas within a storage field."

We have discussed the treatment of farm taps in DIMP FAQ C.3.7 (issued 08/02/2010) and in the 4 DIMP Webinars.

PHMSA's position is that since a farm tap is neither a transmission pipeline or a gathering pipeline it is a distribution pipeline

Treatment of Farm Taps in DIMP

- PHMSA continues to meet with Stakeholders as the Farm Tap discussion involves regulated and unregulated production, gathering, transmission, and distribution pipeline operators.
- PHMSA believes that the risk to the public from farm taps is generally low and is considering amending Part 192 to exempt farm taps from the requirements of Part 192, Subpart P - Gas Distribution Pipeline Integrity Management.
- Letter from NAPSR to PHMSA was received requesting farm taps being taken out of DIMP and develop new regulations on over-pressure protection for individual services regulator stations (farm taps).
- Farm Taps will be included in the NPRM Rule titled Operator Qualification (formerly Miscellaneous II Rule) and is scheduled to be issued in mid-2015 .

Plastic Pipe

NPRM to address the following plastic pipe topics will be issued in Spring 2015

- AGA petition to raise design factor from 0.32 to 0.40 for PE pipe
- Enhanced Tracking and traceability
- Authorized use of PA12
- Miscellaneous revisions for PE and PA11 pipelines
- Additional provisions for fittings used on plastic pipe

Excavation Damage Prevention

Final Rule moved past PHMSA - NPRM published 4/2/2012

- Pursuant to the PIPES Act, PHMSA is proposing criteria and procedures for determining whether a state's enforcement of its excavation damage prevention laws is adequate.
- Excavation damage is a leading cause of natural gas and hazardous liquid pipeline failure incidents.
- Better, more effective enforcement of state excavation damage prevention laws is a key to reducing pipeline excavation damage incidents.
- Though all states have a damage prevention program, not all states adequately enforce their state damage prevention laws.

Standards Update

Final Rule- published 1/5/2015

- Major Topics
  - Addresses the set of Incorporated by Reference (IBR) standards throughout PHMSA's part 192, Part 193 and Part 195 code with updated revisions of standards from all standard organization bodies.
  - This Rule impacts 22 of the 60+ standards that we currently IBR.
  - Per recent statute (Section 24, revised) all IBR standards pertaining to PSR must be available for free to the public. (Most SDOs comply)
  - ANSI IBR portal – ibr.ansi.org

Standards Update (continued)

- Effective March 6, 2015, PHMSA amended the Federal pipeline safety regulations to IBR new, updated or reaffirmed editions of the voluntary consensus standards that are applicable to pipelines subject to the requirements of the Federal pipeline safety regulations.
- Of specific interest is revision to PE standard:
  - ASTM D2513–09a—PHMSA incorporates ASTM D2513–09a, ‘‘Standard Specification for Polyethylene (PE) Gas Pressure Pipe, Tubing, and Fittings,’’ except section 4.2, ‘‘Rework Material.’’

Miscellaneous Rulemaking

- NPRM published 11/29/2011
- Final Rule published this week in Federal Register
- Effective date of these amendments is October 1, 2015

Proposals Addressed in Final Rule

1. Responsibility to Conduct Construction Inspections.
2. Leak Surveys for Type B Gathering Lines.
3. Qualifying Plastic Pipe Joiners.
4. Mill Hydrostatic Tests for Pipe to Operate at Alternative MAOP.
5. Regulating the Transportation of Ethanol by Pipeline.
6. Limitation of Indirect Costs in State Grants.
7. Transportation of Pipe.
8. Threading Copper Pipe.
9. Offshore Pipeline Condition Reports.
10. Calculating Pressure Reductions for Hazardous Liquid Pipeline Integrity Anomalies.
11. Testing Components other than Pipe Installed in Low-Pressure Gas Pipelines.
12. Alternative MAOP Notifications.
13. National Pipeline Mapping System.
14. Welders vs. Welding Operators.
15. Components Fabricated by Welding.
16. Odorization of Gas.
17. Editorial Amendments.

Information Collection Activities

- Distribution Annual Report modifications to align leak causes with the Incident Report have initiated
- Other modifications are being discussed and solutions identified for their implementation, and these include:
  - Easier data input fields for mileages and services
  - Definition of the type of operator
  - Definition of the commodity transported.
  - New material category to gather information on the amount of cast iron that has been lined (e.g., cured in place liners).

DIMP Enforcement Guidance

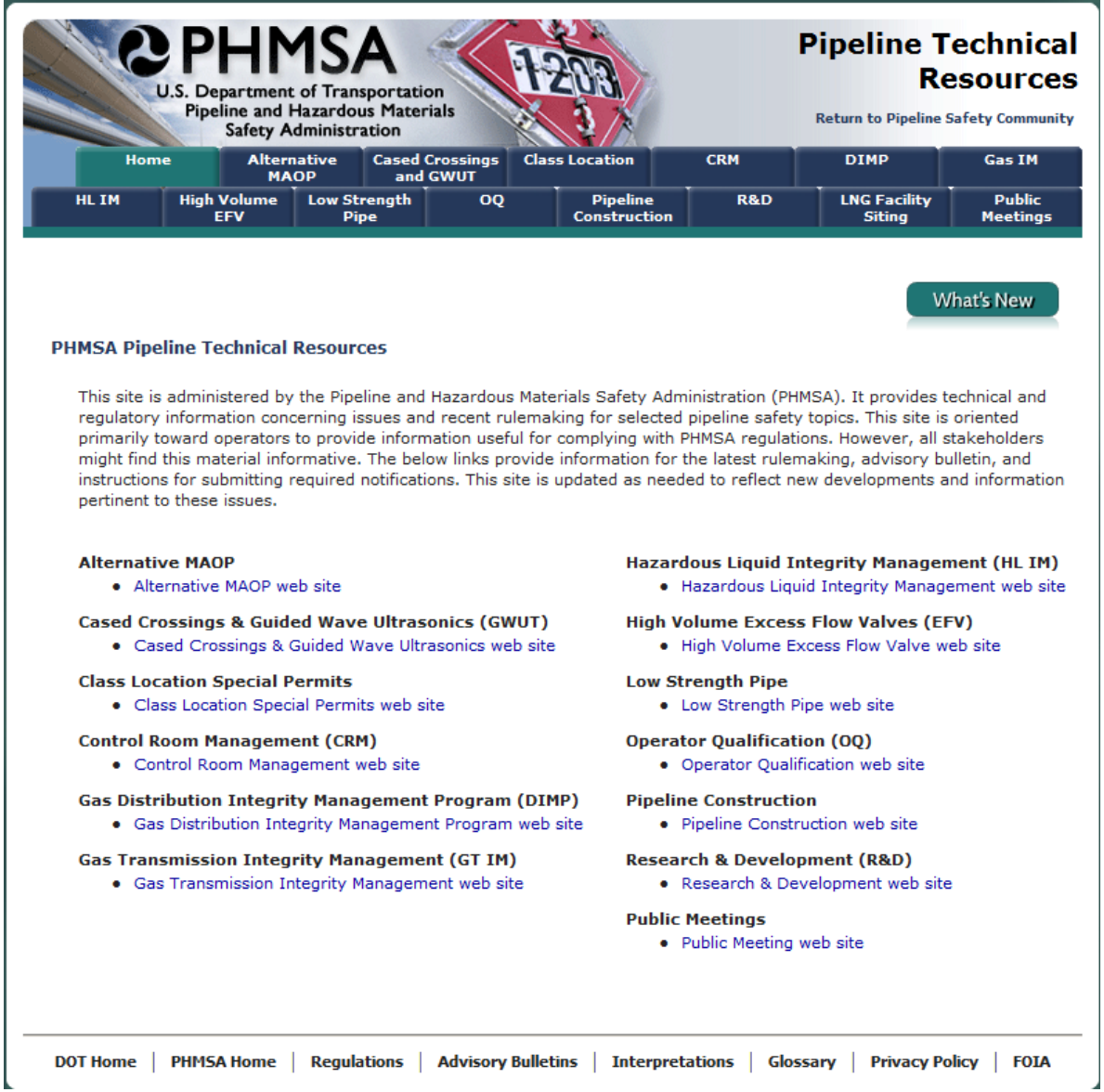
- DIMP Enforcement Guidance is posted and publicly available on PHMSA's website with the other Enforcement Guidance documents at http://www.phmsa.dot.gov/foia/e-reading-room
- This posting allows Operators to understand Regulators' expectations with regards to the DIMP Regulation and other regulations and supports their implementation of their programs

PHMSA Websites are One of Our Primary Forms of Communication

PHMSA Pipeline Safety

http://phmsa.dot.gov/pipeline

Pipeline Technical Resources



http://primis.phmsa.dot.gov/ptr.htm

DIMP Home

PHMSA
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Pipeline Technical Resources

Return to Pipeline Safety Community

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HL IM | High Volume EFV | Low Strength Pipe | OQ | Pipeline Construction | R&D | LNG Facility Siting | Public Meetings

Gas Distribution Integrity Management Program

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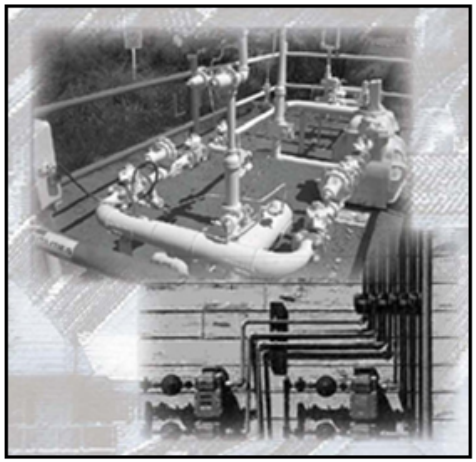

The Pipeline and Hazardous Materials Safety Administration (PHMSA) published the final rule establishing integrity management requirements for gas distribution pipeline systems on December 4, 2009 (74 FR 63906). The effective date of the rule is February 12, 2010. Operators are given until August 2, 2011 to write and implement their program.

PHMSA previously implemented integrity management regulations for hazardous liquid and gas transmission pipelines. These regulations aim to assure pipeline integrity and improve the already admirable safety record for the transportation of energy products. Congress and other stakeholders expressed interest in understanding the nature of similarly focused requirements for gas distribution pipelines. Significant differences in system design and local conditions affecting distribution pipeline safety preclude applying the same tools and management practices as were used for transmission pipeline systems. Therefore, PHMSA took a slightly different approach for distribution integrity management, following a joint effort involving PHMSA, the gas distribution industry, representatives of the public, and the National Association of Pipeline Safety Representatives to explore potential approaches.

http://primis.phmsa.dot.gov/dimp/index.htm

PHMSA Websites

Please regularly use PHMSA websites as they are a primary form of communication with Stakeholders

PHMSA Office of Pipeline safety

http://phmsa.dot.gov/pipeline

DIMP Home Page

http://primis.phmsa.dot.gov/dimp/index.htm

Pipeline Safety Stakeholder Communications

http://primis.phmsa.dot.gov/comm/

Pipeline Replacement Updates

http://opsweb.phmsa.dot.gov/pipeline_replacement/

Questions and Answers

- Thank you for your participation!