



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

Administrator

1200 New Jersey Ave., S.E.  
Washington, DC 20590

November 29, 2018

The Honorable John Thune  
Chairman, Committee on Commerce,  
Science, and Transportation  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

Section 19(c) of the Pipeline Safety Improvement Act of 2002 (Pub. L. No. 107-355) requires the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) to report to Congress each year on any pipeline safety recommendations made by the National Transportation Safety Board (NTSB) during the prior year and to provide a copy of the response for each recommendation. The enclosed report is submitted in fulfillment of this requirement.

As of December 31, 2018, the NTSB issued two safety recommendations to PHMSA during calendar year 2018, as listed in the report enclosed with this letter. Our report provides information on our responses to these recommendations.

We take our responsibility to address all recommendations seriously and will continue to work aggressively to close all open recommendations.

I have sent similar letters to the Ranking Member of the Senate Committee on Commerce, Science, and Transportation; the Chairman and the Ranking Member of the House Committee on Energy and Commerce; and the Chairman and the Ranking Member of the House Committee on Transportation and Infrastructure.

If I can provide further information or assistance, please feel free to call me or have your staff contact Bobby Fraser, Director of Governmental, International, and Public Affairs, by phone at (202) 366-5839 or by email at [bobby.fraser@dot.gov](mailto:bobby.fraser@dot.gov).

Sincerely,

Howard R. Elliott

Enclosure



U.S. Department  
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**Pipeline and Hazardous  
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1200 New Jersey Ave., S.E.  
Washington, DC 20590

November 29, 2018

The Honorable Greg Walden  
Chairman, Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, DC 20515

Dear Mr. Chairman:

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1200 New Jersey Ave., S.E.  
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November 29, 2018

The Honorable Bill Nelson  
Ranking Member, Committee on Commerce,  
Science, and Transportation  
United States Senate  
Washington, DC 20510

Dear Senator Nelson:

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1200 New Jersey Ave., S.E.  
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November 29, 2018

The Honorable Peter A. DeFazio  
Ranking Member, Committee on Transportation and Infrastructure  
U.S. House of Representatives  
Washington, DC 20515

Dear Congressman DeFazio:

Section 19(c) of the Pipeline Safety Improvement Act of 2002 (Pub. L. No. 107-355) requires the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) to report to Congress each year on any pipeline safety recommendations made by the National Transportation Safety Board (NTSB) during the prior year and to provide a copy of the response for each recommendation. The enclosed report is submitted in fulfillment of this requirement.

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1200 New Jersey Ave., S.E.  
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November 29, 2018

The Honorable Bill Shuster  
Chairman, Committee on Transportation and Infrastructure  
U.S. House of Representatives  
Washington, DC 20515

Dear Mr. Chairman:

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1200 New Jersey Ave., S.E.  
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November 29, 2018

The Honorable Frank Pallone, Jr.  
Ranking Member, Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, DC 20515

Dear Congressman Pallone:

Section 19(c) of the Pipeline Safety Improvement Act of 2002 (Pub. L. No. 107-355) requires the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) to report to Congress each year on any pipeline safety recommendations made by the National Transportation Safety Board (NTSB) during the prior year and to provide a copy of the response for each recommendation. The enclosed report is submitted in fulfillment of this requirement.

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**ANNUAL REPORT: NATIONAL TRANSPORTATION SAFETY BOARD CY 2018  
RECOMMENDATIONS ON PIPELINE SAFETY**

**NTSB Safety Recommendation P-18-1**

**Recommendation:** *Work with state pipeline regulators to incorporate into their inspection programs, a review to ensure that gas distribution pipeline operators are using best practices recommended by the manufacturer in their distribution integrity management programs, including using the specified tools and methods, to correctly install PermaLock mechanical tapping tee assemblies.*

**Response:**

We concur. By August 31, 2019, PHMSA proposes to modify supporting information in the Distribution Integrity Management Program (DIMP) Inspection Assistant (IA) to specifically reference the issues with installation of PermaLock mechanical tapping tee assemblies. The changes to the DIMP IA will help federal and state users ensure that gas distribution operators are following manufacturer best practices for parts, including the PermaLock mechanical tapping tee assembly. PHMSA will notify states of the updated questions when they are published. Furthermore, PHMSA will post the updated forms on our website. PHMSA's IA program is used by all federal—and some state—regulators, and it is therefore an efficient way to communicate pressing safety issues to pipeline regulators.

To reach PHMSA's state partners, by August 31, 2019, PHMSA will update our Gas State Program Evaluation questionnaire to include an assessment of whether state inspectors have guidance on reviewing operators' use of manufacturer-recommended best practices in their operations and maintenance manuals and distribution integrity management programs. This guidance should include the use of specified tools and methods to correctly install PermaLock mechanical tapping tee assemblies. PHMSA is currently communicating with the National Association of Pipeline Safety Representatives (NAPSR) regarding these modifications.

By January 31, 2019, PHMSA will also work with the American Public Gas Association (APGA) Security and Integrity Foundation (SIF) to include a set of questions regarding PermaLock mechanical tapping tee assemblies in the APGA SIF's Simple, Handy, Risk-based Integrity Management Plan (SHRIMP) online tool for operators of natural gas distribution systems. Operators use SHRIMP to create a DIMP plan customized for the specific needs of their systems. PHMSA's work with APGA and APGA SIF has already begun. Actions to date include APGA forwarding the NTSB report and recommendations to its members, informing operators that risks identified with PermaLock mechanical tapping tee assemblies should be accounted for in an Operator's DIMP, and reminding operators that they should ensure that best practices recommended by the manufacturers are incorporated into applicable procedures in their required operations and maintenance manuals.

## **NTSB Safety Recommendation P-18-2**

**Recommendation:** *Reference the use of external sources of information for threat identification in your frequently asked questions for preparation of distribution integrity management programs.*

**Response:**

We concur and proposed closure of the recommendation. PHMSA has posted a reference to the NTSB Safety Recommendation Report, *Installation of PermaLock Mechanical Tapping Tee Assemblies*, on the DIMP Resources webpage under Advisory Bulletins at <https://primis.phmsa.dot.gov/dimp/resources.htm> to communicate to operators this external source of information for threat identification. PHMSA believes that a combination of posting this reference to the NTSB report and our existing frequently asked questions (FAQs) meets the NTSB's intent of ensuring that operators consult external sources for information in their threat identification process.

PHMSA agrees that operators are responsible for using all relevant external sources in the threat identification step of their distribution integrity management programs. PHMSA uses FAQs to support implementation of the regulations by operators and regulators. These FAQs are important for management-based regulations like DIMP. PHMSA posts public FAQs and other important information and resources. PHMSA's current DIMP FAQ includes C.4.a.5, "What comprises 'reasonably available' information?"

*[...]PHMSA expects that operators will devote sufficient effort to develop as thorough an understanding of their pipelines as they can while using reasonable effort.*

*[...] Operators need to review all records that are relevant to the current condition of the pipe or have a significant impact on the integrity of the pipe.[...]*

*Operators must identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records and develop a plan to collect it. They may collect this information through their normal activities including those that go beyond those activities specified in Part 192. For example, missing facility location, material and condition data can be gained when the pipe is located and/or exposed.*

*Operators could involve maintenance personnel in their information collection activities, surveying them about unusual circumstances they have encountered in their activities and/or asking them to review resulting system descriptions and identify any information they believe is useful that is not already included.*