



**26th ANNUAL PHMSA
GAS PIPELINE SAFETY SEMINAR**

Gas Pipeline Safety Update

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GPS Concerns

- **Replacement personnel**
- **Training Coordinator**
- **Conducting training utilizing existing personnel**
- **Coordination of training (fire schools, PE qualification)**



GPS Concerns (cont.)

- **Annual Reports – Failure to Submit**
 - **GPS Rule 7 & PHMSA required (below)**
 - **Available on PHMSA database**
 - **Not being uploaded electronically**
 - **Need information as accurate as possible – review before submittal**

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed \$100,000 for each violation for each day the violation continues up to a maximum of \$1,000,000 as provided in 49 USC 60122.



GPS Concerns (cont.)

- ***Incident Reports – Extended periods to update and finalize***
 - ***GPS Rules 9 & 10 and PHMSA (below)***
 - ***Possible fines for failure to file***
 - ***Hold-ups due to legal concerns***

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GPS Concerns (cont.)

- *Public Awareness Plans*
 - *Most submitted on time*
 - Most Common Problems Noted*
 - *No statement of management support*
 - *Plan did not specify the frequencies of audits and effectiveness surveys*



GPS Concerns (cont.)

Most Common Problems Noted (cont.)

- ***Messages not sent to affected stakeholder groups***
- ***Messages not sent at required frequencies***
- ***Effectiveness surveys not performed at the required intervals***



GPS Concerns (cont.)

- ***DIMP***
 - ***First round of inspections almost complete***
 - ***Still finding shortcomings in plans***
 - ***Violation letters sent to those operators***



On the Radar with PHMSA

➤ *Integrity Verification Process (IVP)*

Based on 4 Basic Principles

- *Apply to higher risk locations*
 - *High Consequence Areas (HCAs)
and Moderate Consequence
Areas (MCAs)*



On the Radar with PHMSA (cont.)

➤ *Moderate Consequence Area (MCA):*

- ***Non-HCA pipe in Class 2, 3, and 4 locations***
- ***Non-HCA pipe Class 1 locations that are populated in PIR (proposed 1 house or occupied site) to align with INGAA commitment***
- ***House count and occupied site definition same as HCA, except for 1 house or 1 person at a site (instead of 20)***



On the Radar with PHMSA (cont.)

- *Integrity Verification Process (cont.)*
 - *Screen segments for categories of concern (e.g., “Grandfathered” segments)*
 - *Assure material and records documentation*
 - *Perform assessments to establish MAOP*



Upcoming Workloads and Possible Regulatory Changes

- ***DIMP Implementation Inspections***
 - ***Second round of DIMP inspections***
 - ***How is each operator's DIMP working?***
 - ***What type of changes have been made to the initial DIMPs?***



Upcoming Workloads and Possible Regulatory Changes

- ***Are changes being incorporated into the DIMPs?***
- ***Are all personnel involved in changes and notified?***
- ***Have risks been re-evaluated due to changes in threats?***



Upcoming Workloads and Possible Regulatory Changes

- ***Near-miss incident reporting***
- ***Automatic shut-off valves***
- ***EFVs on multi-family and small commercial services***
- ***Gathering pipelines***
- ***Expanded natural gas transmission integrity management***
- ***Safety Management Systems***



Upcoming Workloads and Possible Regulatory Changes

- ***Excavation damage prevention exemptions (already cost state “One-Call Grant” and “Damage Prevention Grant”)***
- ***Excavation damage enforcement***

(both require legislative reform)



Violations?

Respond in writing

Response “by” date on letters to ensure that response is returned to GPS office in a timely manner.



What's ahead?

Jeff Wiese – Associate Administrator for Pipeline Safety, PHMSA

Somewhere north of 80 mandates from Congress and recommendations from National Transportation Safety Board, Government Accounting Office, and the Office of the Inspector General



Handy Websites

<http://www.psc.state.al.us/>

<http://www.phmsa.dot.gov/>

**[http://primis.phmsa.dot.gov/dimp/re
sources.htm](http://primis.phmsa.dot.gov/dimp/resources.htm)**



QUESTIONS?

