

REGULATORY UPDATE

28th Annual

Gas Pipeline Safety Seminar

December 1, 2015

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Alabama Public Service Commission



REGULATORY UPDATE

* Gas Pipeline Safety Staff:

* Investigators:

North Alabama:

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Training Coordinator

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Administrative

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REGULATORY UPDATE

CONCERNS FOR REGULATORS

- **Aging workforce**
 - **Retirement of skilled workers**
 - **Inexperience of newly-hired workers**
 - **Training of new workers**
 - **Quality of training**
 - **Documentation of training**



REGULATORY UPDATE

POTENTIAL SOLUTIONS FOR OPERATORS

- **Special consideration to vets**
- **Trade schools (assist in design of and setting up training programs)**
- **Apprenticeships**
- **Manufacturer donations (equipment and training programs)**
- **Referral bonuses**
- **Vendors**



REGULATORY UPDATE

- **Miscellaneous Changes to Pipeline Safety Regs: [PHMSA Docket-2010-0026]**
 - **Final Rule issued on March 11, 2015**

 - **Post-construction inspections**
 - **Post-construction inspections of transmission and hazardous liquids pipelines must be performed by a person other than the one who performed the construction task.**

 - ***Indefinitely postponed***



REGULATORY UPDATE

- **Miscellaneous Changes to Pipeline Safety Regs (cont.)**
- **Welders vs Welding Operators: Welding operators are now specifically included in the requirements for welding procedures and qualifications; also added Appendix A of API 1104 as an option for evaluating welds**
- **Qualifying Plastic Pipe Joiners: plastic pipe joiners must be re-qualified each calendar year (not to exceed 15 months) or after any production joint is found unacceptable**



REGULATORY UPDATE

Enforcement of State Excavation Damage Laws **[PHMSA Docket-2009-0192]**

- **Advanced Notice of Proposed Rulemaking (ANPRM)**
 - **Published in Federal Register on October 29, 2009**
- **Comments received until December 14, 2009**
- **Final Rule published on July 23, 2015**
- **Eight states already deemed ineligible for One-Call and State Damage Prevention (SDP) Grants (based on exemptions)**
- **PHMSA will definitely enforce Damage Prevention in the states if 1) the state has no enforcement authority (to include civil penalties) or 2) there is no designated enforcement body**



REGULATORY UPDATE

➤ Pending Regulations: [PHMSA Docket-2011-0023] NPRM

➤ Safety of Gas Transmission Pipelines:

- PHMSA will be reviewing the definition of an HCA (including the concept of a potential impact radius),
- the repair criteria for both HCA and non-HCA areas,
- requiring the use of automatic and remote controlled shut off valves,
- valve spacing,
- whether applying the integrity management program requirements to additional areas would mitigate the need for class location requirements.



REGULATORY UPDATE

➤ Pending Regulations: [PHMSA Docket-2010-0229] NPRM

➤ Safety of On-Shore Hazardous Liquid Pipelines:

This rulemaking would address effective procedures that hazardous liquid operators can use to improve the protection of High Consequence Areas (HCA) and other vulnerable areas along their hazardous liquid onshore pipelines.

- **Include other areas in HCAs**
- **Repair time frames for areas outside of HCAs**
- **Leak detection, valve spacing in new construction**

➤ **Comment period ends January 8, 2016**



REGULATORY UPDATE

- **Pending Regulations: [PHMSA Docket-2011-009]**
NPRM
- **Excess Flow Valves for Multi person dwellings**
- **This would require excess flow valves (EFVs) be installed in all new and renewed gas service lines, for structures other than single family dwellings, when the operating conditions are compatible with readily available valves**



REGULATORY UPDATE

Pending Regulations: [PHMSA Docket-2013-0255] NPRM

- **Valve installation and Minimum Rupture Detection Standards (Rupture Detection and Valve Rule) - NPRM**
- **This would require mandatory installation of automatic shutoff valves, remote controlled valves, or equivalent technology and establish performance based meaningful metrics for rupture detection for gas and liquid transmission pipelines**



REGULATORY UPDATE

Pending Regulations: [PHMSA Docket-2013-0163] NPRM

➤ Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety

Proposed Changes

- **OQ enhancement, including new construction**
- **Control room management updates**
- **Adding reference to Appendix B of API 1104 related to in-service welding in parts 192 and 195**
- **Provide telephonic or electronic notification of an accident or incident at the earliest practicable moment, including the amount of product loss, following confirmed discovery**
- **Comment period ended September 8**



REGULATORY UPDATE

Pending Regulations: [PHMSA Docket-2014-0006] NPRM

- Issues related to the use of Plastic Pipe in Gas Pipeline Industry
 - The topics to be addressed in this rulemaking include: PE, PA11, PA12, 50 year markings, design factors, risers, incorporation by reference of certain plastic pipe related standards, and tracking and traceability



REGULATORY UPDATE

PHMSA Issues

- 1) Accident Report Forms**
- 2) Mechanical Fitting Failure Report**
- 3) Annual Report Forms**



REGULATORY UPDATE

State Issues

1) Annual Reports - timely filing

2) Access to records

- * Section 37-4-83 Powers of commission - Promulgation of rules; requiring records; inspections.**
- * It may require each such pipeline system to make, maintain and file such books, papers, records and documents as the commission may deem necessary, which books, papers, records and documents shall be made available to members of the commission and their employees upon request.**



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State Issues (cont:)

- 3) 2016 Pipeline Safety Seminar**
- 4) PE Qualifications and Fire Training**
- 5) MAOP Records**
- 6) Atmospheric Corrosion**
- 7) OQ Program Inspections**
- 8) DIMP Phase 2 begins CY 2016**

REGULATORY UPDATE

➤ E-Mails and web links

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QUESTIONS?

