

# **Gas Pipeline Safety**

# 49 USC Chapter 601

- Statutory basis for pipeline safety program
- Establishes framework for promoting pipeline safety
  - Exclusive Federal authority for all pipeline facilities
  - Natural Gas Act 1968 from downhole to burner tip - chose not to regulate parts
  - Outlines delegation to States for intrastate pipelines

# 49 USC Chapter 601

- Participation in pipeline safety grant program is voluntary
- WV programs certified under USC §60105
- WV certified for gas and hazardous liquids

# State Programs

- Fifty-two state programs
- 80% of the nations 2.8 million miles of pipe under state programs
- States perform 99% of yearly inspections

# State Programs

- GPSD inspect
  - 100% of Distribution,
  - 87% Gas Gathering,
  - 25% Hazardous liquid, and
  - 6% Gas Transmission of WV pipelines
  
- 14,014 regulated miles

# §60105 Certification

- Intrastate facilities – WV assumes inspection and enforcement responsibility for intrastate facilities under State law – WVSR Chapter 24B
- Chapter 24B outlines jurisdiction
- State may adopt more stringent intrastate standards as long as Federal minimums are met



# §60105 Certification

- Adopt each Federal standard
- Enforce each standard
- Have same authority for inspection and enforcement
- Promote program designed to prevent damage
- Compliance monitoring

# USC Chapter 60107

- Authorizes Federal grants-in-aid
- 49 CFR 198 – *Regulations for Grants to Aid State Pipeline Safety Programs*
  - State Program Grants
  - One-Call Grants
  - Damage Prevention Enforcement



# USC Chapter 60107

- Administered by PHMSA State Programs
  - Formula for grant allocation found in §198.13(b)
  - Grants fund up to 80% of a state's pipeline safety program
  - Reimbursement grants – money already spent
  - Grants are limited to the appropriated funds available.

# USC Chapter 60107

- Annual certification inspection according to procedures outlined in 49 CFR 198 and other documents as found at <https://phmsa.dot.gov/pipeline/stateprograms/stateoversight>

# USC Chapter 60107

- Division funding based on scores from annual certification inspection
- Money allocated through 4 year PHMSA reauthorization
  - Spread among 52 state programs
- Every three years grant spending audit
- Remainder of annual funding through pipeline assessment fee

# §60105 Certification

- File annual progress report
- Follow Guidelines for State Participating in the Pipeline Safety Program
- <https://www.phmsa.dot.gov/working-phmsa/state-programs/guidelines-states-participating-pipeline-safety-program-pdf>

## Guidelines for States Participating in the Pipeline Safety Program



**Pipeline and  
Hazardous Materials  
Safety Administration**

# USC Chapter 60107

- Progress Report submitted annually
  - Operators and units within State
  - Inspector training and qualifications
  - Number of inspections, number of inspection days
  - Enforcement actions
  - Incidents/Accidents

# USC Chapter 60107

- Annual certification inspection according to 90 page evaluator guide
  - Written procedures and forms
  - Records
  - State regulations
  - Types of inspections performed
- Participate in actual inspection
  - Inspectors performing operator inspections



# State Program Evaluation

- Annual review of both gas and hazardous liquid programs
- Review of prior calendar year
- <https://www7.phmsa.dot.gov/working-phmsa/state-programs/evaluation-search?page=1>

# State Program Guidelines

- States operate differently from PHMSA
- Different guidelines, different inspections
- States required to perform:
  - 85 inspection days per inspector per year
  - Total number of yearly inspection days established by calculation tool
  - 20% of total days MUST be construction

# State Program Guidelines

- Establishes types and frequency of inspections
- Each unit inspected at least every 5 years
- GPSD developed multi-year inspection schedule
  - Shared programs and procedures
  - Visit every operator every year
  - Based on 4 year cycle

# Forms

- Use IA PHMSA developed inspection software
  - Question not necessarily strictly on code section
  - Provide considerations for questions
- Questions provided prior to inspection
- Gathering lines Type B and construction use GPSD forms
- Federal forms available at:

<https://www.phmsa.dot.gov/forms/pipeline-compliance-forms>

# Type of Inspections

- Standard/OQ
- Every two years for each unit
  - Based on state regulations
- Review of the records for the inspections and tests required by either
  - §192 Subparts I, L, and M or
  - §195 Subpart F and H

# Type of Inspections

- Standard/OQ
  - Field verification of performance of OQ task
- Includes facility site visits
- Specific for type of system – distribution, hazardous liquid, gas transmission
- Unit inspection – area reasonably covered in a couple of days



# Types of Inspection

- O&M Manual (O&M)
  - Review of the written procedures required by § § 192.605 and 195.402
  - Every 5 years
  - May be examined during standard inspection as well
  - Specific to type of system – gas transmission and Type A gathering or distribution, or hazardous liquid

# Types of Inspection

- Operator Qualification Program (OQ)
  - Written plan and records
  - §192, Subpart N
  - §195, Subpart G
  - Every 5 years
  - Use same form for all systems
  - Not required for Type B gathering

# Types of Inspection

- Integrity Management (IM)
  - Every 5 years
  - DIMP, TIMP, or LIMP
  - §192, Subparts O and P, or §195.452
  - Written procedures and records
  - Transmission inspections include review of assessments
  - Does not apply to gathering lines

# Types of Inspection

- Public Awareness Program (PAP)
  - Every 5 years
  - §192.616 and §195.440
  - API RP 1162 (1<sup>st</sup> edition)
  - Same form used for all types of facilities

# Types of Inspection

- Control Room Management (CRM)
  - Every 5 years
  - §192.631 or §195.446
  - Participated with PHMSA on some interstate inspections that include WV facilities
  - Limited to transmission and distribution
  - Same form for all assets

# Types of Inspection

- Drug and Alcohol (D&A)
  - Every 5 years
  - 49 CFR 199 and 40 and 49 CFR 199
  - PIPES Act 2020 allows states to use another states inspection to meet requirement
    - May just perform number verification
  - Same form for all assets



# Types of Inspection

- Design, Testing and Construction
  - As needed
  - Includes new lines, repairs, replacements, or relocations of existing lines
  - Includes on site visits as well as construction records such as completions reports
  - Major construction reports

# Types of Inspection

- Investigating failures, incidents, or accidents
- Outages
- Complaints
- As needed basis
- On site visits may be necessary

# Pre Inspection

- Establish inspection schedule
- Inspector creates inspection in IA
- Inspector provides questions to operator
  - Forms also available on line

# During the Inspection

- Provide response to each question
- Six possible responses
  - Sat, Unsat, Concern, Pending, NA (not applicable) and NC (not checked)
- Evidence
- Changes and updates during inspection

# Post Inspection

- Exit interview – required by §150 CSR 4, Section 11.7
  - Pending responses must be changed
- PIPES Act of 2016 requires 90 day written notification if unsats or concerns

# State Program Guidelines

- Multi year inspection plan
- Trying to reduce visits
- Willing to schedule with other states
  - Several last year with Ohio, some this year with Pennsylvania
  - Several CRM with PHMSA
- Let us figure out what forms to use



# Questions