



# Regulatory Update

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## Gas Pipeline Safety Staff

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Mary Friend	Director
Bob Weiford	Manager
Girija Bajpayee	Inspector
David Hancock	Inspector
Keith Knowles	Inspector
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## Contact Information

24 Hour Emergency Reporting 304-340-0486

General E-mail [GPS\\_INFO@psc.state.wv.us](mailto:GPS_INFO@psc.state.wv.us)

Web Portal [Gas Pipeline Safety Launch Page - Public Service Commission of West Virginia \(state.wv.us\)](#) (password required)

Web Site [Gas Pipeline Safety - West Virginia Public Service Commission \(state.wv.us\)](#)

### TYPE OF PIPELINE MILES

Year	Hazardous Liquid <sup>(1)</sup>	Gas Transmission (Intrastate)	Regulated Gas Gathering <sup>(2)</sup>	Gas Distribution		Total
				Mains	Services	
2022	142	221	2,637	11,080	2,302	16,382
2021	142	212	317	11,054	2,289	14,014
2020	142	212	328	11,031	2,322	14,035
2019	188	170	400	11,007	2,237	14,002
2018	151	168	399	10,961	2,282	13,974

<sup>(1)</sup> Includes both transmission and gathering

<sup>(2)</sup> Number may not represent all regulated gathering

<b>Inspection Performance</b>			
<b>Year</b>	<b>Inspections</b>	<b>Inspectors</b>	<b>Inspection Days</b>
<b>2022</b>	224	4 FT, 3PT	619
<b>2021</b>	253	3FT, 3PT	710
<b>2020</b>	154	4 FT	525
<b>2019</b>	178	4 FT	516
<b>2018</b>	137	2 FT, 3PT	439

## **Other Numbers**

- 2022
  - Inspected 100% distribution operators, 93% of transmission/gathering operators, 86% of hazardous liquid operators
  - 85% of units in state (excluding master meters)
  - 355 major construction reports (>\$50,000)
  - Visited approximately 22% of jobs
  - Approximately 25% inspection days on construction
  - Three reportable incidents

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## 2022 Regulatory Review

### Incident Cost

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#### §191.3 – Incident definition

- Estimated property damage
  - Loss to operators and others, or both, but excludes gas loss
- Cost may be adjusted annually
  - July 1, 2022 – increased to **\$129,300**
  
- §150 CSR4, Section 9.6
- Remember West Virginia limit is still \$50,000, including gas lost
- Telephonic report to GPSD emergency number
  - 30 day written report

## **Drug and Alcohol**

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December 23, 2022

- Reduce rate of testing for covered employees to 25% for calendar year 2023
- Positive drug test rate below 1.0% for 2 consecutive calendar year
  - Information submitted through PHMSA portal

## **ADB 22-01**

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Potential for Damage to Pipeline Facilities cause by Earth Movement and Other Geological Hazards

- 2020 accident in Satartia, MS
- Changing weather patterns may affect integrity
- Between 2015 and 2020 WV lead in pipeline events due to land movement
- Provide 9 actions to ensure pipeline safety
  - May be considered both preventative and mitigative measures
  - May be used as P&M measures for integrity management purposes
- Movement may be reportable as safety related conditions under §§191.23 and 195.55

## Gathering Line Rule

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Safety of Gas Gathering Pipelines: Extension of Reporting Requirements, Regulation of Large, High-Pressure Lines, and other Related Amendments

- Amdts 191-30, 192-129,
  - corrections in 191-31, and 192-131
- Issued November 2, 2021
- Effective May 16, 2022
- Compliance deadlines of May 16, 2023
- Amdt. 192-132 some exceptions for all gathering lines

## Gathering Line Rule

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- Created new Type C lines, and Type R lines
  - Presentations to GOWV
  - Determine status of lines by November 16, 2022
  - Reporting required March 15, 2023 for lines operated in 2022
- Limited stay of enforcement for small diameter line
- Not required to perform any inspection in 2023

## Gathering Line Rule

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- PHMSA working on FAQ's, inspection forms and enforcement guidance
- GPTC working on guide material
  
- Verification of Type C lines as we perform other inspections

## Valve Rule

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### Valve Installation and Minimum Rupture Detection Standards

- Amendments 192-130 and 195-105
- Issued April 7, 2022
- Effective October 5, 2022
- Applies to HL & gas transmission lines  $\geq 6$ " in diameter and HL gathering lines that span water crossings  $>100$  feet, and HL low stress lines subject to §195.260(e)

## Valve Rule

- Rupture-mitigation valve (RMV)
  - Minimize the volume of a release and mitigate the consequences
  - Automatic shut-off valve (ASV)
  - Remote-control valve (RCV)
  - Alternative equivalent technologies



## Valve Rule

- Newly constructed or “entirely replaced” pipelines must be equipped with rupture mitigation valves or alternative equivalent technology
  - Entirely replaced 2 or more miles of pipe, in the aggregate, that have been replaced within 5 contiguous miles in a 24 month period (§§192.3, 195.2)
- New valve spacing requirements for gas transmission and hazardous liquid pipelines



## Valve Rule

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- Release of product representative of a notification of potential rupture, as soon as practicable but within 30 minutes operator must:
  - Identify the rupture
  - Fully close any RMV or alternative technology to mitigate the rupture

## Valve Rule

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- Develop written procedures regarding identification and confirmation of ruptures
- Maintenance and drill requirements for equivalent technology to ensure 30 minute valve closure
- Investigation following rupture with any lessons learned implemented in system

## Valve Rule

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- Language added to §§ 192.615 and 195.402(e) regarding emergency notification
  - Notice to the appropriate public safety answering point
    - 911 call center
    - State or county emergency management or coordinating agencies
    - WVSC Chapter 15-5C reporting to Division of Homeland Security and Emergency Management or 911 within 15 minutes

## Emergency Plans §§ 192.615 & 195.402

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### 9-1-1 notification requirements

- Liaison with and contact appropriate public safety answering point if available – if not, liaison with and contact appropriate local emergency coordinating agencies
- Learn responsibilities, resources, jurisdictional areas, emergency contact numbers for those government organizations that may respond to emergencies involving pipeline facilities

## Valve Rule

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- Language added to §§ 192.615(a)(1) & (8) and 195.402(e)(1) & (7) regarding emergency notification
  - Applies to **ALL** operators, not just transmission
  - Written procedures for coordinating and sharing information
  - Notification of appropriate public safety answering point for ruptures
    - §§192.635 and 195.417 provide methods to determine rupture

## §192.617

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- No longer just failure investigation
- Changes in failure and incident investigation
  - Establish and follow procedures of investigating and analyzing failures and incidents
  - Post-failure and incident lessons learned from post-failure or incident review incorporated into training and qualification, design construction testing maintenance
  - Additional requirements for transmission lines and events involving RMVs.

## Transmission Rule

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Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments

- Amendment 192-132
- Referred to as Rin 2 of Megarule
- Issued August 24, 2022
- Effective May 24, 2023

Issued to improve the safety of onshore gas transmission lines

## Transmission Rule

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Definitions in §192.3

Transmission line –

- *Pipeline or connect series of pipelines*
- Transports gas from gathering line to a distribution center, storage facility, or large volume customer not downstream from distribution center
- *MAOP ≥ 20% SMYS*
- Transports gas in a storage field, or
- *Is voluntarily designated by the operator*

# Transmission Rule

## Definitions in §192.3

### Distribution Center

initial point where gas enters piping used primarily to deliver gas to customers who purchase it for consumption, as opposed to customers who purchase it for resale, for example:

- (1) At a metering location;
- (2) A pressure reduction location; or
- (3) Where there is a reduction in the volume of gas, such as a lateral off a transmission line

NAPSR petitioned for stay of enforcement

# Transmission Rule

## Additional definitions in §192.3

### Dry Gas

- Gas above its dew point and without condensed liquids

### Close Interval Survey

### Hard spot

### ILI

In-line inspection tool or instrumented internal inspection device

### Wrinkle bend



## Transmission Rule

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§192.7 New incorporated by reference documents

§192.13(d) – Management of change process

- Outlined in ASME/ANSI B31.8S Section 11
- For non-HCAs implemented by February 26, 2024

## Transmission Rule

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Inspection of coating on transmission lines after construction

- §§192.319, 192.461

Monitoring and remediation

- §192.465

Interference Currents

- §192.473

Internal Corrosion control

- §192.478

## Transmission Rule

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### Continuing Surveillance

- §192.613

### Repair and Remediation

- §§192.711, 192.714

### Remaining Strength and critical strain levels

- §§192.485, 192.712

### IM Changes

- §§192.911, 192.917, 192.923, 192.927, 192.929, 192.933, 192.935, and 192.941 (low stress reassessments)

## Safety of Gas Distribution Pipelines (RIN: 2137-AF53)

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- Addresses Leonel Rondon Act within the PIPES Act of 2020
- Major topics under consideration
  - Sections 202; 203; 204 and 206 – DIMP Plans, Emergency Response Plans, Records, presence of qualified employees, safety of district regulator stations, operations and maintenance
- Transmitted to DOT Secretary on 2/14/23
- Next action: 2023 NPRM

## **Pipeline Operational Status (RIN: 2137-AF52)**

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- Idled Pipelines
- PIPES Act of 2020 defines an “idled pipeline”
  - Will not resume service in 180 days
  - Has been isolated from all sources of hazardous liquid, natural gas and has been purged.
- API RP 1181; addresses idled pipelines
- Next action: 2023 NPRM

## **Class Location Change Requirements**

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- NPRM published 10/14/20
- Current Requirements when class locations change
  - Valve spacing for class changes addressed in valve rule
- Major Topics include option of management type approach vs pipe replacement, examination of additional options,
- PIPES Act 2020 mandate to have a GPAC meeting
- Anticipate 2023 Final Rule



## Standards update I and II

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### ▪ Standards Update I

- NPRM published 1/15/2021
- Steel pipe and other steel fittings, API 1104, NFPA. B31.8 and B31.8S

### Standards Update II

- NPRM published 8/29/22;
- ILI, NACE ECDA, plastic pipe and fitting standards updates

## Unusually Sensitive Area (USA) Definition for HL Pipelines

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- **USA Interim Final Rule** has a comment end date and effective date published on 12/27/2021
- Addresses USAs for Great Lakes, Coastal Beaches and Certain Coastal Waterways
- PHMSA recently updated its National Pipeline Mapping System (NPMS)
  - Updated to show USAs
- Effective date is 2-25-2022, limited stay of enforcement on April 21, 2022
- Waiting on final rule

## Hazardous Liquid Pipelines Repair Criteria

- This rule was split from original Hazardous Liquid NPRM published on 10/13/2015
- Repairs in HCA and non-HCA areas
- NPRM date and content to be determined
- Next action to publish NPRM



