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Rulemakings
Control Room Management

Addresses human factors and other aspects of control room management for pipelines where controllers use supervisory control and data acquisition (SCADA) systems.
Distribution IMP

Requires operators of gas distribution pipelines to develop and implement integrity management (IM) programs.

The purpose of these programs is to enhance safety by identifying and reducing pipeline integrity risks.
Incorporates by reference all or parts of 40 new editions of voluntary consensus technical standards.

This action allows pipeline operators to use current technologies, improved materials and updated industry and management practices.
Reporting Requirements

This final rule revises the Pipeline Safety Regulations to improve the reliability and utility of data collections from operators of natural gas pipelines, hazardous liquid pipelines, and liquefied natural gas (LNG) facilities.
Mechanical Fitting Failures

Clarifies the types of pipeline fittings involved in the compression coupling failure information collection; changes the term "compression coupling" to "mechanical fitting," aligns a threat category with the annual report; and clarifies the Excess Flow Valve (EFV) metric to be reported by operators of gas systems.

Final Rule 192-116
Control Room Management

Amends the program implementation deadlines. The procedures required by Paragraphs (b) (roles and responsibilities), (c)(5) (shift change), (d)(2)-(3) (fatigue mitigation education and training), (f) (change management), and (g) (operating experience) of the rule must now be implemented no later than October 1, 2011.
Advisory Bulletins
To: Owners and Operators of Natural Gas Pipeline Distribution Systems. Subject: Updated Notification of the Susceptibility of Older Plastic Pipes to Premature Brittle-Like Cracking.
Premature brittle-like cracking requires relatively high localized stress intensification that may result from geometrical discontinuities, excessive bending, improper installation of fittings, dents and/or gouges. Because this failure mode exhibits no evidence of gross yielding at the failure location, the term brittle-like cracking is used. This phenomenon is different from brittle fracture, in which the pipe failure causes fragmentation of the pipe.
ADB-07-01 (02)

- ADB–99–01
  - Century Utility Products, Inc. -
- ADB–99–02
  - Installed between the 1960s and early 1980s
- ADB–02–07
  - Century Utility Products, Inc. Products;
  - Low-ductile inner wall “Aldyl A” piping manufactured by DuPont Company before 1973; and
  - Polyethylene gas pipe designated PE 3306
Adding:

- Delrin insert tap tees
- Plexco service tee Celcon (polyacetal) caps.
Personal Electronic Device (PED) Related Distractions.

Owners and operators of natural gas and hazardous liquid pipeline facilities should integrate into their written procedures for operations and maintenance appropriate controls regarding the personal use of PEDs by individuals performing pipeline tasks that may affect the operation or integrity of a pipeline.
ADB-10-08

- Advisory Bulletin to remind operators of gas and hazardous liquid pipeline facilities that they must make their pipeline emergency response plans available to local emergency response officials.
Severe flooding can adversely affect the safe operation of a pipeline. Operators need to direct their resources in a manner that will enable them to determine the potential effects of flooding on their pipeline systems.
Future Projects
NTSB Recommendations and New Reauthorization
Topics

- Grandfather Clause of 192.619
- Remote Controlled Valves
- Pressure Testing
- Real-time Leak Detection Systems for SCADA
- Post construction pressure test required for construction and material defect threats
Topics

- Aldyl “A” plastic pipe
- Cast Iron
- Other problem piping
Plastic Pipe Issues

- Address the .40 petition for PE
- Installation and other construction issues
- Tracking and Traceability
- ASTM standards
EFV’s for Multiple Residences and Small Industrial Customers
Gas Gathering Lines

- Leak Survey
- Confirm End of Gathering
Outstanding Topics
DIMP Pilot Inspection
Findings and Discussions
Pilot Inspections

- 6 pilot inspections
- Purpose was to validate inspection form
- Sizes ranged from 500,000 down to 6000
- Single state operators and multiple state operators
- Using different types of tools for the develop of the plan and the risk analysis
The Pipeline and Hazardous Materials Safety Administration (PHMSA) published the final rule establishing integrity management requirements for gas distribution pipeline systems on December 4, 2009 (74 FR 63906). The effective date of the rule is February 12, 2010. Operators are given until August 2, 2011 to write and implement their program.

PHMSA previously implemented integrity management regulations for hazardous liquid and gas transmission pipelines. These regulations aim to assure pipeline integrity and improve the already admirable safety record for the transportation of energy products. Congress and other stakeholders expressed interest in understanding the nature of similarly focused requirements for gas distribution pipelines. Significant differences in system design and local conditions affecting distribution pipeline safety preclude applying the same tools and management practices as were used for transmission pipeline systems. Therefore, PHMSA took a slightly different approach for distribution integrity management, following a joint effort involving PHMSA, the gas distribution industry, representatives of the public, and the National Association of Pipeline Safety Representatives to explore potential approaches.

http://primis.phmsa.dot.gov/dimp/
<table>
<thead>
<tr>
<th>Question No.</th>
<th>Rule §192</th>
<th>Description</th>
<th>S/Y</th>
<th>U/N</th>
<th>N/A</th>
<th>N/C</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>.1005</td>
<td>Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? OR For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?</td>
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Inspector’s Comments
Key Findings

- Risk analysis not explained well in writing
- The “environment” around the pipeline not addressed in a lot of the pilot inspections
- Not taking credit for what they are already doing
- No performance measures for all A/A activities
PHMSA has recognized farm taps as distribution lines for several years as addressed in the following rulemakings:

1. In the “Customer-Owned Service Lines” Final Rule (60 FR 41821) Docket Number 95-20021

2. In the “Excess Flow Valve-Performance Standards” Final Rule (61 FR 31449) Docket Number 96-15564

FAQ C.3.7 Are operators required to include “farm taps” in their distribution integrity management plan?
Farm Taps

The “farm tap” is pipeline upstream of the outlet of the customer meter or connection to the customer meter, whichever is further downstream, and is responsibility of the operator. The pipeline downstream of this point is the responsibility of the customer. Some States require the operator to maintain certain portions of customer owned pipeline. The pipeline maintained by the operator must be in compliance with 49 Part 192.

- Do the facilities meet the definition of Gathering? No.
- Do they meet the definition of transmission? No.
- Then the facilities are distribution.
Evaluate and Rank Risk

A risk evaluation predicts...

- How frequently could it happen?
- If it happens, how significant could it be?

Based on the results, the operator considers if the level of risk warrants additional measures to reduce risk.
Question:
If an operator has a damage prevention program in place does the threat of excavation damage need to be included in the risk ranking?

Our approach is: DIMP plan + Damage Prevention program = DIMP program?

Additionally, GPTC Guidance in Section 5.4 Example of a Risk Evaluation states ....“An operator may choose to conduct a separate risk ranking for the excavation threat, as this threat is not tied to the physical properties of the pipe.”
Answer: No, a damage prevention program alone does not meet the requirements for a threat assessment and risk evaluation for excavation damage.

The DIMP rule requires that the threat of excavation damage be included in the threat identification in §192.1007(b)...The operator must consider the following categories of threats to each gas distribution pipeline:...excavation damage....

From 192.1007(c) ...In this evaluation, the operator must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline.

The operator must assess their damage prevention program and perform a risk evaluation of facilities subject to excavation damage.

The risks can be ranked separately by threat but then need to be merged into one relative risk ranking.

The relative risk ranking includes all risks posed by the eight primary threat categories to the pipeline.
GPTC Section 5.5 Evaluate and Rank Risk – Validation

*It may be determined that facilities or groups of facilities that do not experience problems can be removed from the current risk evaluation and no further action necessary.*

**DIMP Team’s Position**

- All facilities are subject to risk. The facility may not have experienced any threats yet but there is the potential that it may in the future.

- All facilities should be evaluated for each threat. After they are evaluated, no further action may be necessary, but all facilities need to be evaluated for each applicable current and potential threat.
Annual Report - Leak Reporting

- Non-hazardous leaks upon discovery eliminated by lubrication, adjustment, or tightening **are not** reportable.
- Hazardous leaks upon discovery eliminated by lubrication, adjustment, or tightening **are** reportable.
- If a mechanical fitting failure results in a hazardous leak, regardless of how it is eliminated, report the failure on the annual report (Part C) and submit a mechanical fitting failure report.
- Part C “Total Leaks Repaired/Eliminated” include all leaks repaired (GPTC Grade 1,2,3)
- “Leaks at the end of the year scheduled for repair” include:
  - Hazardous leaks (GPTC Grade 1)
  - Leaks that are scheduled for repair
Follow Up Question from May 10 Webinar

Q - A leak is called in. The 1st responder grades the leak as a grade 1. They call for a crew who upon arrival aerate it and now re-grade it as a grade 2 leak. They schedule the leak for repair, come back and repair the grade 2 leak.

- What should the leak repair be graded as….a grade 1 (upon discovery) or a grade 2?

- Or do they report two leaks – grade 1 leak eliminated and a grade 2 leak repaired?

A – They report the “upon discovery” grade and only count the leak one time. The leak wasn’t repaired via aerating, only downgraded.
Q - There is excavation damage to the system which causes a leak, the crew arrives and repairs it. Prior to DIMP, they did not grade the leak, they just fixed it. Does it need to be reported as a leak repaired and do they have to grade it?

A - Yes, reporting the leak would have always been required on the annual report as a leak eliminated/repaired. Now DIMP requires delineation between non-hazardous and hazardous leaks in Part C, so the leak must be graded.
Mechanical Fitting Failure Reports

- Not required *optional* to report failures of the following mechanical fittings
  - Cast iron bell and spigot joint
  - Metal to metal compression fittings
- Do report failures of mechanical fittings with O-ring, gasket, or elastomer seals
  - Repair fittings (e.g. split sleeves, clamps, band sleeves)
  - Bolt on service tees
  - Strap-on saddles
  - Anodeless risers
- FAQs C.5.3 & C.5.4
MFF Online Submission Update

As of May 23:

- 18 Operators, 15 States, 236 Reports (170 by 1 operator)
- 200+ reports in queue

https://portal.phmsa.dot.gov/enrollment/pipelinelogin.html
Performance Measures Report

- Purpose
  - Provide information to evaluate the effectiveness of DIMP
  - Provide data analysis to assist with inspector oversight and operator implementation of DIMP

- National DIMP performance measures:
  - Incident Statistics
  - Excavation Damage Statistics, and
  - Total and Hazardous Leaks Repaired/Eliminated Categorized by Cause
  - Other DIMP related metrics such as the number of EFVs installed and pipeline replacement statistics.
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