PHMSA RULE UPDATE

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November 1, 2017
No, it's not still Halloween.

These are all real.
PHMSA Active Rulemakings

- Safety of Hazardous Liquid Pipelines
- Gas Transmission (Mega Rule)
- Underground Storage Facilities for Natural Gas
- Class Location Requirements
- Valve Installation and Minimum Rupture Detection Standards
- Standards Update - 2015 and Beyond
- Use of Plastic Pipe
- Enhanced Emergency Order Procedures
Safety of Hazardous Liquid Pipelines

- Distributed and sent to the Federal Register for publication in January
- Subsequently pulled back
- Additional comments provided by associations
- Current projected Final Rule - 4/27/2018
Gas Transmission (Mega Rule)

- Mega Rule seems to be on a bit of a diet
- Valves and rupture detection removed
- Gathering delayed
- GPAC met in January and June
- Meeting again in December (delayed by Harvey)
- Current projected Final Rule - 6/29/2018
Underground Storage Facilities for Natural Gas

- Interim Final Rule - 12/19/2016
- Invokes API RP 1170 - Design & Operation of Solution-mined Salt Caverns Used for NG Storage
- Invokes API RP 1171 - Functional Integrity of NG Storage in Depleted HC & Aquifer Reservoirs
- Determined to be non-significant
- Current projected Final Rule (finalize Interim FR) - 1/31/2018
Class Location Requirements

- Revisiting required actions following CL changes
- IM measures in lieu of pipe replacement
- Major part of Integrity rule cost-benefit analysis
- Criteria for Special Permits issued June 2004
- Several applications approved
- PHMSA became increasingly skeptical as construction and material issues surfaced c. 2009
- No recent approvals, but revisiting
- Clustering for CL boundaries?
- Current projected ANPRM - 4/9/2018
Valve Installation & Minimum Rupture Detection Standards

- Originally a topic in Mega Rule ANPRM
- Address Congressional mandates
- Standards for rupture identification and isolation
- Maintenance & inspection, spacing, risk analysis and notification (9-1-1) requirements
- Projected NPRM - September 2017
Standards Update – 2015 and Beyond

- Update to current/more recent versions of IBR consensus standards
- Some over 10 years out of date
- Current projected NPRM - September 2017
Use of Plastic Pipe

- Correct errors and inconsistencies and address petitions regarding plastic pipe
- Tracking and traceability
- Design factor for PE
- Mechanical fittings requirements
- PA-11 and PA-12 use
- Current projected Final Rule - December 2017
Enhanced Emergency Order Procedures

- Interim Final Rule - 10/14/2016
- Enhance PHMSA authority to act immediately
- Finalize Interim Final Rule
- Current projected Final Rule - September 2017
Mega-Rule Progress
GPAC-1 Agenda Items

- IM Reassessment Period 6 Month Grace Period
- Safety Features for Pig Launchers/Receivers
- Provisions to Address Seismicity
- Inspections Following Extreme Events
- Management of Change
- Records
- Corrosion Control
- Corrosion Preventative and Mitigation Measures
- Integrity Management Clarification
## GPAC-1 Agenda Items

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<td>192.933(a) &amp; (d) (shown on PHMSA slide)</td>
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GPAC-1 Agenda Items

- **Reassessment Period 6 Month Grace Period**
  - Agreed on 7 years being to the end of the 7th calendar year, can petition for additional 6 months

- **Safety Features for Pig Launchers/ Receivers**
  - Agreed on safety benefit. To be required on any trap used 6 months after effective date

- **Provisions to Address Seismicity**
  - Approved as proposed. Legislative mandate.
GPAC-1 Agenda Items

- **Inspections Following Extreme Events**
  - 72-hour clock starts when operator determines area is safe to enter and has needed resources
  - Operator encouraged to consult with other officials in making this determination
  - Phrase “whichever is sooner” is deleted

- **Management of Change**
  - Applies to onshore gas transmission
  - Adds environmental and O&M aspects to B31.8S provisions
  - Applies to significant changes affecting safety or environment
  - 2-year phase-in for non-IM, excludes distribution & gathering

- **Records**
  - Significant discussion on placement & details, unresolved
GPAC-1 Agenda Items

- **Corrosion Control**
  - Discussions about post-construction surveys
  - AC mitigation – as needed
  - IC – gathering more data and background
  - Not resolved – to be continued

- **Corrosion Preventative and Mitigation Measures**
  - Don’t duplicate Subpart I in Subpart O
  - P&M measures a toolbox, not a list of everything to do
  - To be continued

- **Integrity Management Clarification**
  - Not clear at all
  - Also to be continued
GPAC-2 Agenda Items

- Corrosion Control
- Records
- IM Clarifications
- Material Documentation
- Integrity Verification Process
- Assessments Outside of HCAs
- MAOP Exceedance Reporting
- Strengthened Assessment Requirements
- Repair Criteria Revisions
GPAC-2 Agenda Items

• Corrosion Control
  o Coating surveys on segments > 1,000 ft
  o Survey and remediate within 6 months of in-service
  o Severe indications
  o Interference surveys is subject to stray current
  o Remediate if > 100 a/m², within 12 months
  o IC – gas quality monitoring if potentially corrosive
  o Once per year minimum
  o Withdraw all proposed changes to 192.935(f), (g), App.E
GPAC-2 Agenda Items

- **Records**
  - RTVC changed back to TVC
  - Documentation for current class location
  - Many records sections not yet addressed

- **IM Clarifications**
  - Three year phase in for risk assessments
  - Proposed 917(d) accepted for plastic pipe
  - Cyclic fatigue requirement to be revised
  - Clarify that all P&M measures are not required
  - M&C defects – discuss later

- **Material Documentation**
  - Delayed to GPAC-3, December 2017
GPAC-2 Agenda Items

- **Integrity Verification Process**
  - Delayed to GPAC-3, December 2017

- **Assessments Outside of HCAs**

- **MAOP Exceedance Reporting**
  - Not applicable to gathering lines

- **Strengthened Assessment Requirements**
  - Delayed to GPAC-3, December 2017

- **Repair Criteria Revisions**
GPAC-3 Agenda Items

- Not published at the time this was prepared
- Should be posted at: https://primis.phmsa.dot.gov/meetings/Home.mtg
New ADBs

• **ADB-2017-01 - Deactivation of Threats**
  o Threats may be active or inactive, but are not eliminated
  o Must follow ASME B31.8S App. A to evaluate
  o Must have all required data to designate as inactive

• **ADB-2017-02 - Training & Qualifications for IMP**
  o Persons conducting IM programs must have demonstrable and documented training and qualifications
Web Locations
(Note: User-hostile site)

- Advisory Bulletins
  http://phmsa.dot.gov/pipeline/regs/advisory-bulletin
- Rulemakings
  http://phmsa.dot.gov/pipeline/regs
- Notices
  http://phmsa.dot.gov/pipeline/regs/notices
- Final Rules
  http://phmsa.dot.gov/pipeline/regs/rulemaking/final
- Regulatory Agenda
  http://www.reginfo.gov/public/do/eAgendaMain
- Monthly Report on Significant Rulemakings
  https://www.transportation.gov/regulations/report-on-significant-rulemakings
In the time you’ve spent listening to this presentation, you could have had one of these. Just sayin’.

But thanks for listening!
QUESTIONS

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IF YOU DARE