



#### NACE HOUSTON SECTION MONTHLY MEETING Tuesday October 11, 2016



Pipeline and Hazardous Materials Safety Administration





- PHMSA Introduction
- PHMSA Safety Posture Initiative
- Importance of Management Systems and Safety Culture
- Reauthorization PIPES Act
- (cont'd)



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### **Today's Topics**

• Report on DOT Significant Rulemakings

Update on Underground Natural Gas Storage

Update on Proposed Rulemaking

Excavation Enforcement Rule



To Protect People and the Environment From the Risks of Hazardous Materials Transportation

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#### PHMSA Introduction



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#### Who is PHMSA - DOT/PHMSA?





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#### Who "We" Are

- Congress sets forth the National Pipeline Safety Program.
  - Established beginning in 1970 on foundation of National Consensus Standards in place at the time; built upon ever since.
  - Responsibility and accountability assigned to the Secretary.
  - Enables Federal-State Pipeline Safety Partnership.
    - Roughly a \$50MM annual grant program
  - The States adopt PHMSA's regulations into their state codes.
  - They may supplement, but not go below U.S. Code.
    - All States besides Alaska and Hawaii
    - State "jurisdiction" varies according to agreement LDC's, transmission (NG+HL), LNG, agent, etc.
    - For greater detail on individual states visit:

#### http://primis.phmsa.dot.gov/comm/states.htm





### **Investing in PHMSA**

- PHMSA's FY 2017 Budget Request: \$295 million
  - \$45.55 Million more than the FY16 Enacted
  - \$9 Million Investment in Using Data to Improve Safety

#### **Using Data to Improve Safety**

Strategic investments to support transformation

#### **PHMSA-wide Investments**

#### Regulatory Support

- Regulatory Counsel
- Project Management

Communications

- Public Outreach
- Stakeholder
  Engagement

**Planning & Analytics** 

- Regulatory Impact Analysis
- Data Analytics & Visualization
- Industry Analysis

Enterprise Risk Management – Pathway to Safety Management System

#### **Hazardous Materials Safety Program**

Risk & Data Management

- Invest in tools to evaluate emerging trends
- Assign inspection assets to highest risks
- Inform regulatory agenda and analysis

#### **Pipeline Safety Program**

Information Sharing System

- Invest in data sharing across government, emergency responders, stakeholders
- Identify &proactively respond to safety risks



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#### What We Regulate

Pipeline Facilities by System Type – CY 2014 data as-of 11/12/2015			
System Type	Miles	% Miles	# Operators
Hazardous Liquid	199,334 7,677 Tanks	7%	456
Gas Transmission	301,810	11%	1,020
Gas Gathering	17,663	1%	367
Gas Distribution (Mains & Services )	2,168,599	81%	1,373
Total	2,687,406	100%	Some Operators have multiple System Types
Liquefied Natural Gas	115 Plants	205 Tanks	83



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Map created November, 2015

#### Pipeline Safety with Context Measures (1988-2015)



**Calendar Year** 

Index (1988 = 1)

Data Sources: Energy Information Administration, Census Bureau, PHMSA Annual Report Data, PHMSA Incident Data -- as of February 24, 2016.



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#### PHMSA Safety Posture Initiative/ Importance of Management Systems and Safety Culture



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PHMSA:

THE MOST INNOVATIVE

#### TRANSPORTATION SAFETY ORGANIZATION IN THE WORLD



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#### Four Key Initiatives to Enable PHMSA 2021





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### **PHMSA Safety Posture Initiative**

- PHMSA's mission is to protect people and the environment from the risks of hazardous materials transportation. Safety is PHMSA's number one priority.
- The Office of the Chief Safety Officer (CSO) has initiated the PHMSA Safety Posture Initiative that supports DOT's strategic priorities, and builds upon DOT's legacy of safety.
- The CSO serves as the primary advocate for safety within PHMSA and is the safety conscience of the agency.
  - Establishes and reviews PHMSA-wide safety and security policies,
  - Evaluates risk and agency performance,
  - Coordinates and harmonizes PHMSA's emergency planning and incident response, and
  - Fosters continuous improvement in PHMSA's safety programs and the safety of PHMSA's employees



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- Advance priority rulemakings, including:
  - Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines (NPRM)
  - Pipeline Safety: Excess Flow Valves in Applications Other than Single-Family Residences in Gas Distribution Systems (NPRM)
  - Pipeline Safety: Enforcement of State Damage Prevention Laws (Final Rule)



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 Address aging pipeline infrastructure and rapid modernization and expansion (e.g., to include new construction; replacement).

 Plan for wider adoption and shifting uses and transportation of natural gas: liquefaction, transport, distribution, export, intermodal connections



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 Advance PHMSA's pipeline damage prevention program.

 Continue to address pipeline operations and management (e.g., continuous improvement of integrity management; information collection on existing pipeline systems; and other operational changes such as flow reversals and conversions).



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- Continue to pursue and foster non-regulatory approaches to effect continuous improvement in safety, such as Safety Management Systems, Safety Culture, and incentivizing regulated entities to move beyond mere compliance with regulations by adopting and institutionalizing voluntary, meaningful, comprehensive programs that will advance safety.
  - API RP 1173
  - Safety Culture implementation is first step



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## **Underlying Principles**

- The Pipeline Operator Alone is Responsible for Safe Operations:
  - It is the responsibility of pipeline operators to understand and manage the risks associated with their pipelines.
- The Regulator Can Influence Operator Performance:
  - PHMSA's primary role is to establish minimum safety standards
- PHMSA also strives to impact operator performance beyond mere compliance with the regulations
- API RP 1173 Pipeline Safety Management Systems (PSMS) national consensus standard has been published
  - Support maturation of safety culture within organizations
  - Support development of safety management systems





### **Observation:**

 Major Accidents Always Result in Demands for Broader and More Prescriptive Regulations.

 For the Past Two Decades, PHMSA has Promoted Regulations Based on Pipeline -Specific Risk Management Programs instead of "One-Size Fits All" Totally Prescriptive Regulations.



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## <u>Recent Events</u> Illustrate Weaknesses in Managing Risk

Effective risk analysis might have prevented or mitigated recent high consequence accidents

Weaknesses identified include *inadequate*:

Knowledge of pipeline risk characteristics including recordkeeping deficiencies.

Processes to analyze interactive threats

Evaluation of ways to reduce or mitigate consequences

Process to select P&M measures

Lack of objective, systematic approach

Much work remains to improve tools and techniques.



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## **Moving from Compliance to Choice**

Our world has changed - forever

- Growing public intolerance to risk yet highly rate sensitive
- Vastly increased media attention
- Social media (without editorial control)
- Energy pipelines have graduated to the national stage, many times for the wrong reasons



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## **Moving from Compliance to Choice**

 Our world must move from a "checkbox" mentality to understanding the health of our pipeline systems by analyzing and understanding data and information and promptly acting to reduce risks.

 Prescription may need to be added to performance based IM regulations to address inadequacies identified in inspections and accidents



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#### **Reauthorization – PIPES Act**



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#### **Reauthorization Update**

- Congress Reauthorizes the Federal Pipeline Safety Program Every 4 years.
- Congressional Oversight Committees:
  - Senate Commerce, Science, and Transportation
  - House Energy and Commerce
  - House Transportation and Infrastructure



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#### **Reauthorization Update**

- Protecting our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2016
- Signed by the President on June 22
- 19 new mandates
- Of note:
  - Emergency Order Authority
  - Underground Gas Storage



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#### **Reauthorization Update**

- Other issues addressed include:
  - Small Scale LNG
  - State participation in federal inspections
  - Pipeline Advisory Committee Make-up
  - Nationwide integrated database study
  - Information sharing system working group
  - State pipeline safety agreements GAO study
  - Odorization study
  - Natural gas leak reporting
  - State policies relating to natural gas leaks



The 2011 reauthorization of PHMSA's pipeline safety program expired in 2015. The 2011 Act included 42 specific directives for PHMSA to carry out to improve pipeline safety, but thus far PHMSA has completed just over half of them. The PIPES Act of 2016 ensures the agency finishes out the 2011 Act requirements; reforms PHMSA to be a more dynamic, data-driven regulator; and provides regulatory certainty for citizens, the safety community, and the industry.



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#### Improves safety by closing gaps in federal Standards

- Requires PHMSA to set federal minimum safety standards for underground natural gas storage facilities, and allows states to go above those standards for intrastate facilities.
- Authorizes emergency order authority that is tailored to the pipeline sector, taking into account public health and safety, network, and customer impacts.
- Updates regulations for certain liquefied natural gas facilities to better match changing technology and markets and take into account national security considerations.



#### Improves safety by closing gaps in federal standards

- Increases inspection requirements for certain underwater oil pipelines to enhance safety.
- Ensures that pipeline operators receive timely postinspection information from PHMSA to allow them to maintain and improve their safety efforts, and ensures that product composition information is quickly provided to first responders after an incident.
- Improves protection of coastal areas, marine coastal waters, and the Great Lakes by explicitly designating them as unusually environmentally sensitive to pipeline failures.



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# Enhances the quality and timeliness of PHMSA rulemakings

- Requires PHMSA to update Congress every 90 days on outstanding statutory mandates, including the status of each mandate, reasons for its incompletion, and estimated completion date.
- Requests two Government Accountability Office (GAO) studies on the effectiveness of integrity management programs for both natural gas and hazardous liquids pipelines.



#### Promotes better use of data and technology to improve pipeline safety

- Tasks GAO with investigating how to use technology to improve third-party damage prevention (a leading cause of releases).
- Requires GAO to study the latest innovations in pipeline materials, corrosion prevention technology, and training.



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#### Promotes better use of data and technology to improve pipeline safety

- Creates a working group of PHMSA, states, industry stakeholders, and safety groups to develop recommendations on how to create an information sharing system to improve safety outcomes.
- Authorizes PHMSA to study the feasibility of a national integrated pipeline safety database to have a clearer picture of federal and state safety oversight efforts.



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# Leverages federal and state pipeline safety resources

- Authorizes states to participate in interstate pipeline inspections.
- Provides tools to enhance PHMSA's efforts to hire pipeline safety personnel.
- Requires the DOT Inspector General to study staff resource constraints and make recommendations to Congress to address PHMSA's hiring challenges and training needs.





#### **Regulatory Update/ Report on DOT Significant Rulemakings**



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## **Regulatory Update**

- Final Rules Issued
  - Excavation Damage Prevention Enforcement
- Final Rule Imminent
  - Excess Flow Valves
  - Hazardous Liquid Pipelines
- Current Proposals
  - Plastic Pipe
  - OQ, Cost Recovery, Incident Notification, and Other Updates
  - Natural Gas Transmission and Gathering Pipelines
- Rules Under Development
  - Valves and Rupture Detection
  - Underground Natural Gas Storage



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## **Current Observations**

- Compliance is all too often considered a *goal* instead of the *minimum price of admission*.
- The regulatory process is designed to be deliberative and it takes time – and that works, but isn't agile.
- Regulators work tirelessly to implement congressional and oversight agency direction that follows all bad accidents.
  - Continued debate on role of *prescription* v. *performance*
- Risk management is in our DNA, but we all need to evolve.
  - Not just what is required, but what is relevant AND possible.
  - Inadequacies: Financial risk, system information, changing environments around the system, variable workforce, interacting variables, changes (in general), etc.
- Fix the Problem or Fix the Blame.



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# **Report on DOT Significant Rulemakings**

### http://www.dot.gov/regulations/report-onsignificant-rulemakings

#### **Overview**

The Significant Rulemakings Report provides a summary and the status for all significant rulemakings that DOT currently has pending or has issued recently. We update the Report at the beginning of each month. The information in the Report is not intended to commit DOT to specific conclusions or actions. For example, after further analysis, DOT may decide the effects of the rule would be different or it may decide to terminate the rulemaking.



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# **Report on DOT Significant Rulemakings**

- Pipeline and Hazardous Materials Safety Administration
- 84. <u>Pipeline Safety: Safety of Hazardous Liquid Pipelines</u>
- 85. <u>Pipeline Safety: Excess Flow Valves In Applications Other Than</u> <u>Single-Family Residences in Gas Distribution Systems</u>
- 86. Pipeline Safety: Gas Transmission (RRR)
- 87. <u>Pipeline Safety: Amendments to Parts 192 and 195 to require</u> <u>Valve installation and Minimum Rupture Detection Standards</u>



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# **Report on DOT Significant Rulemakings**

- Pipeline and Hazardous Materials Safety Administration
- 88. <u>Hazardous Materials: Oil Spill Response Plans and Information</u> <u>Sharing for High-Hazard Flammable Trains</u>
- 89. <u>Hazardous Materials: Enhanced Safety Provisions for Lithium</u> <u>Batteries Transported by Aircraft</u>
- 90. <u>Hazardous Materials: FAST Act Requirements for Real-Time</u> <u>Train Consist Information</u>
- 91. Pipeline Safety: Underground Storage Facilities for Natural Gas



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# Update on Underground Natural Gas Storage



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### Aliso Canyon Field– Porter Ranch, CA Relief Well #1 (background) Relief Well #2 (foreground)





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# **Natural Gas Pipeline Storage**

- Natural gas transmission pipelines do not have capacity to meet peak demand (much larger pipelines would need to be built)
- Storage is needed to meet variable demand:
  - Base Load: Long-term(~months) seasonal increases
  - Peak Load: Short-term(hours-days-weeks) sudden increases







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## **Types of Natural Gas Pipeline Storage**

### 1) Liquefied Natural Gas (LNG)

**2) Line Pack**: "Pack the pipeline full" by increasing the pressure (up to MAOP)

3) Liquefied Petroleum Gas (e.g. Propane)

- 4) Underground Storage
  - Depleted Fields
  - Depleted Aquifers
  - Salt Caverns





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# **3 Types of Underground Storage**



# **Underground Gas Storage**

- ~ 400 interstate and intrastate underground natural gas storage facilities currently operate in the U.S.
- ~ 4.7 trillion cubic feet of natural gas working capacity in U.S. SoCal C



SoCal Gas – Aliso Canyon Field, CA - Well SS25 – leak Oct. 2015 to Feb. 2016



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# ~400 Facility Locations (eia)



## Major Underground Natural Gas Storage Incidents

- 2001: Yaggy Hutchison, KS
  - Gas leak travelled approx. 9 miles underground
  - 2 fatalities, fire damaged many buildings
- 2004: Moss Bluff Liberty County, TX
  - Fire burned for 6<sup>1</sup>/<sub>2</sub> days
  - Approx. 6 bcf natural gas released
- 2015: Aliso Canyon Porter Ranch, CA





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# Aliso Canyon - Well SS25

- In October, 2015, SoCal Gas' Aliso Canyon Well SS25 developed a natural gas leak near an area known as Porter Ranch in Los Angeles, CA
- Well plugged in mid-February 2016
- ~ 5 billion cubic feet of natural gas was released into the atmosphere
- ~ 5,790 households were relocated due to the co-release of natural gas with odorant (mercaptans).
- Cost over \$500-million
- Cause of well leak is under-failure investigation
- Aliso Canyon Field has 115 wells





### Aliso Canyon Leak Common Symptom Complaints from Residents

- Headache or migraines
- Nausea / vomiting / stomach ache
- Nosebleeds
- Shortness of breath /
- difficulty breathing
- Chest tightness / chest heaviness
- Dizziness / lightheadedness
- Eye irritation
- Nose or throat irritation
- Cough

Reported by Katie Butler, LA County Department of Public Health at PHMSA Underground Natural Gas Storage Safety Workshop on July 14, 2016

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## Aliso Canyon Leak Public Health Recommendations

- Ventilate homes to flush out residual contaminants run central fans and heating/ventilation/air conditioning (HVAC) units and open all doors, windows and large cabinets
- Clean all surfaces use high efficiency particulate air (HEPA) filter vacuum and wet wipe hard surfaces
- Maintain air purifiers and change filters regularly
- Clean air ducts
- Change air filters
- Spot treat oily residue
- Launder clothing



Reported by Katie Butler, LA County Department of Public Health at PHMSA Underground Natural Gas Storage Safety Workshop on July 14, 2016.



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# **Underground Gas Storage**

### • ADB-2016-02

- Owners and Operators of Underground Pipeline and Storage Facilities regarding the Safe Operation of Underground Storage Facilities for Natural Gas
- Operators of underground storage facilities used for the storage of natural gas, as defined in 49 CFR Part 192, should review their O&M and ER activities to ensure the integrity of underground storage facilities are properly maintained



Aliso Canyon, CA Field - leak



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# **Federal Safety Regulations**

- Natural Gas Pipeline Safety Act of 1968
  - The first federal statute regulating pipeline safety
  - Authority for transportation of gas:
    - Non-rural gathering lines
    - Transmission lines
    - Distribution lines
    - Natural Gas Underground Storage



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# **Underground Gas Storage**

### After Aliso Canyon Leak – What's next?

- CA has strengthened their well regulations
- Rulemaking by PHMSA?
  - API RP 1170 and 1171
- Public Workshops by PHMSA
  - Denver area on July 14; link to web site is below
  - <u>http://primis.phmsa.dot.gov/meetings/MtgHome.mtg?mtg</u> =115
- Task Force to review Underground Storage
  - Department of Energy
  - Department of Transportation PHMSA
  - Others





# 2016 PIPES Act (June 22, 2016)

### Sec. 12. Underground Gas Storage Facilities:

# § 60141. Standards for underground natural gas storage facilities

(a) MINIMUM SAFETY STANDARDS.—Not later than 2 years after the date of enactment of the PIPES Act of 2016, the Secretary, in consultation with the heads of other relevant Federal agencies, shall issue minimum safety standards for underground natural gas storage facilities.



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# **PHMSA Steps**

- Advisory Bulletin: February 5
- DOE/PHMSA Interagency Task Force: April 1
- 2016 PIPES Act mandate: June 22
- Public Workshop: July 14 in Boulder, CO
- Research Forum: October 19-20 in Phoenix, AZ
- Federal Regulations
  - Interim Final Rule (IFR)
  - Detailed regulatory review



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# Summary of Proposed Interim Final Rule

- Underground Natural Gas Storage (UNGS) Facilities - proposed
  - Incorporates by reference
  - API RP 1170, "Design and Operation of Solutionmined Salt Caverns used for Natural Gas Storage" (July 2015), and
  - API RP 1171, "Functional Integrity of Natural Gas Storage in Depleted Hydrocarbon Reservoirs and Aquifer Reservoirs" (September 2015).



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## Do operators presently implement API RP 1171 and/or 1170 standards?

- Reservoir design including maximum operating pressures and geologic formation and environmental effects
- Well drilling and completion including well control practices
- Operations and Maintenance
- Integrity Management
- Emergency Preparedness and Response
- Training
- These practices should already be a in place based upon operators responses to RSPA in 1994 public meetings



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# **Update on Proposed Rulemaking**

### **Safety of Gas Transmission & Gathering Pipelines**



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### NPRM: Safety of Gas Transmission & Gathering Pipelines (Docket: PHMSA-2011-0023)

### Published - April 8, 2016 Comment period end - July 7, 2016



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## Timeline – Gas Transmission & Gathering Pipelines NPRM

- Advance Notice of Proposed Rulemaking (ANPRM) published on August 25, 2011, "Pipeline Safety: Safety of Gas Transmission Pipelines" (PHMSA-2011-0023)
- PHMSA sought public comment on 15 topics (122 questions)
- 103 comment letters received
- Included topics covering NTSB recommendations from San Bruno and Marshall, MI accidents, and Mandates from 2011 Pipeline Safety Act.



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# **Summary of Proposed Changes**

PHMSA proposing rule changes in the following areas for gas transmission and gas gathering pipelines -

- 1. Require Assessments for Non-HCA's
- 2. Strengthen repair criteria for HCA and Non-HCA
- 3. Strengthen requirements for Assessment Methods
- Clarify requirements for validating & integrating pipeline data
- 5. Clarify functional requirements for risk assessments
- 6. Clarify requirement to apply knowledge gained through IM
- 7. Strengthen corrosion control requirements
- 8. Add requirements for selected P&M measures in HCAs to address internal corrosion and external corrosion



# **Summary of Proposed Rule**

- 9. Management of change
- Require pipeline inspection following extreme external events
- 11. Include 6 month grace period (w/notice) to 7 year reassessment interval (Act § 5(e))
- 12. Require reporting of MAOP exceedance (Act § 23)
- 13. Incorporate provisions to address seismicity (Act § 29)
- 14. Add requirement for safety features on launchers and receivers
- 15. Gathering lines- Require reporting for all & some regulatory requirements
- 16. Grandfather clause/Inadequate records Integrity Verification Process (IVP)



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## **16. Integrity Verification Process (IVP)**

- Statutory Mandates and NTSB Rec.
- Records
- Material Documentation
- MAOP Determination



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### "Grandfathered" Pipe & Related Issues

- PSA of 2011 §23(a) 60139(d) mandate "Testing Regulations" - pressure testing or alternative equivalent means such as ILI program for all Gas Transmission pipe (Class 3, 4 and all HCAs) not previously tested;
- NTSB P-11-14 "Delete Grandfather Clause" recommends all grandfathered pipe be pressured tested, including a "spike" test;
- **NTSB P-11-15 "Seam Stability"** recommends pressure test to 1.25 x MAOP before treating latent manufacturing and construction defects as "stable."
- NTSB P-11-17 "Piggable Lines" Configure all lines to accommodate smart pigs, with priority given to older lines



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## **Basic Principles of IVP Approach**

#### • IVP is based on 4 principles

- 1. Apply to high risk locations
  - High Consequence Areas (HCAs), Class 3 and 4 Locations and Moderate Consequence Areas (MCAs)
- Screen segments for categories of concern (e.g., "Grandfathered" segments; bad records)
- 3. Assure adequate material and documentation
- 4. Perform assessments to establish MAOP



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## **Excavation Enforcement Rule**



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# **Excavation Damage Prevention**

- PHMSA proposed criteria and procedures for determining whether a state's enforcement of its excavation damage prevention laws is adequate.
- Excavation damage is a leading cause of natural gas and hazardous liquid pipeline failure incidents.
- Better, more effective enforcement of state excavation damage prevention laws is a key to reducing pipeline excavation damage incidents.
- Though all states have a damage prevention program, not all states adequately enforce their state damage prevention laws.





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# **Excavation Enforcement Rule**

On July 13, 2015, the U.S. Department of Transportation's (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) announced the issuance of a final rule to establish the process for evaluating State excavation damage prevention law enforcement programs and enforcing minimum Federal damage prevention standards in States where damage prevention law enforcement is deemed inadequate or does not exist.



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# **Excavation Enforcement Rule**

This final rule amends the Federal pipeline safety regulations to establish the following:

- Criteria and procedures PHMSA will use to determine the adequacy of State pipeline excavation damage prevention law enforcement programs;
- The administrative process PHMSA will use in determining the adequacy of State excavation damage prevention law enforcement programs;
- The Federal requirements PHMSA will enforce in States with inadequate excavation damage prevention law enforcement programs; and
- The adjudication process for administrative enforcement proceedings against excavators where Federal authority is
  exercised.



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### Damage Prevention "Excavator" Enforcement

- Effective Date of Rule is 1/1/2016
- The rule creates:
  - Part 198, Subpart D Criteria for adequate State DP enforcement programs and process for assessment
  - Administrative procedures for States to contest a notice of inadequacy
  - New Part 196 Standards for excavators digging near pipelines
  - Adjudication process for excavators cited by PHMSA Same as for operators cited by PHMSA for violations of pipeline safety regulations



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# **PHMSA Excavator Enforcement**

- PHMSA's enforcement focus will be on **Serious violations**
- End Goal All states to have enforcement programs and use it. Not for PHMSA to punish excavators
- PHMSA will learn about violations through a variety of ways; the rule does not create a reporting requirement
- PHMSA's standards for excavators are the "floor" or "baseline"; when conducting enforcement, PHMSA will be cognizant of State requirements
- PHMSA and States have existing authority to enforce against non-compliant pipeline operators



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## What Can PHMSA Enforce (Part 196)?

- Failure to use one-call system before excavating. [196.103(a)]
- Failure to wait for the pipeline operator to arrive at the excavation site and establish and mark the location. [196.103(b)]
- Failure to excavate with proper regard for the marked location of pipelines. [196.103(c)]
- Failure to make additional use of one-call as necessary. [196.103(d)]



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## What Can PHMSA Enforce (Part 196)?

- Failure to promptly report any damage of a pipeline due to excavation activity to the pipeline operator. [196.107]
- Failure to promptly report any release of any PHMSA-regulated natural and other gas or hazardous liquid by calling the 911 emergency telephone number. [196.109]

Note: Pipeline operators and their contractors are also subject to the excavation damage prevention requirements of 49 CFR Parts 192 and 195. Enforcement against pipeline operators or their contractors for alleged violations as excavators will be pursued in accordance with Section 4 of these Pipeline Safety Enforcement Procedures. [196.111]



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#### Draft PHMSA Excavation Enforcement Process





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# **Excavation Enforcement Rule**

More Information:

http://phmsa.dot.gov/pipeline/safety-awareness-andoutreach/excavator-enforcement

including

FAQ's:

http://phmsa.dot.gov/pipeline/safety-awareness-andoutreach/excavator-enforcement/faqs



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Websites are our primary form of communication

- <u>http://phmsa.dot.gov/pipeline</u>
- <u>http://primis.phmsa.dot.gov/dimp/</u>
- <u>http://primis.phmsa.dot.gov/meetings/</u>
- http://www.phmsa.dot.gov/foia/e-reading-room





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# Thank you

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