American Public Gas Association

Pipeline Safety & APGA Update

Carolinas Public Gas Association

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PIPELINE SAFETY UPDATE

REGULATION

Proposed Rule		Final Rule	
	Estimated NPRM Publication		**Estimated Final Rule Publication**
Standards Update - 2015 and Beyond (will be 2 rules)	2021	**Valve Installation & Rupture Detection**	Q4 2020
		Gas Regulatory Reform	Q1 2021
Class Locations	August 2020	**Gas Transmission Rule (Non-Mandates)**	2020
LNG Rule	March 2020	**Gas Gathering Rule**	2020
		Operator Qualification	Delayed

Gas Regulatory Reform Rule

NPRM publication date: June 9, 2020
Comments Submitted: August 10, 2020
GPAC Meeting Scheduled: October 7, 2020

1. Flexibility in farm tap inspection requirements;
2. Repeal DIMP requirements for master meter operators;
3. Repeal submission requirements for the MFF reports;
4. Adjust the monetary damage threshold for reporting incidents for inflation;
5. Allow remote monitoring of rectifier stations;
6. Revise the inspection interval for monitoring atmospheric corrosion on gas distribution service lines to 5 years;
7. Update the design standard for PE pipe and raise the maximum diameter limit;
8. Revise test requirements for pressure vessels consistent with ASME BPVC;
9. Revise welder requalification requirements to provide scheduling flexibility; and
10. Extend the allowance for pre-tested short segments of pipe and fabricated units to pipelines operating at a hoop stress less than 30% SMYS and above 100 psi

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Atmospheric Corrosion Checks §192.481

Current

(a) Each operator must inspect each pipeline … as follows:

If the pipeline is located:	Then the frequency of inspection is:
Onshore	At least once every 3 calendar years, but with intervals not exceeding 39 months
Offshore	At least once each calendar year, but with intervals not exceeding 15 months

(b) During inspections the operator must give particular attention to …

(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479.

Proposed

(a) Each operator must inspect **and evaluate** each pipeline… as follows:

If the pipeline is located:	Then the frequency of inspection is:
Onshore **other than a service line**	At least once every 3 calendar years, but with intervals not exceeding 39 months
Onshore **service line**	**At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section**
Offshore	At least once each calendar year, but with intervals not exceeding 15 months

(b) …

(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479.

(d) If atmospheric corrosion is found on a service line during the most recent inspection, then the next inspection of that pipeline or portion of pipeline must be within 3 calendar years, with an interval not exceeding 39 months.

Industry Comments

(a) Each operator must inspect ~~and evaluate~~ each pipeline… as follows:

(b) …

(c) …

(d) If atmospheric corrosion is found on a service line ~~during the most recent inspection, then~~ operators must:

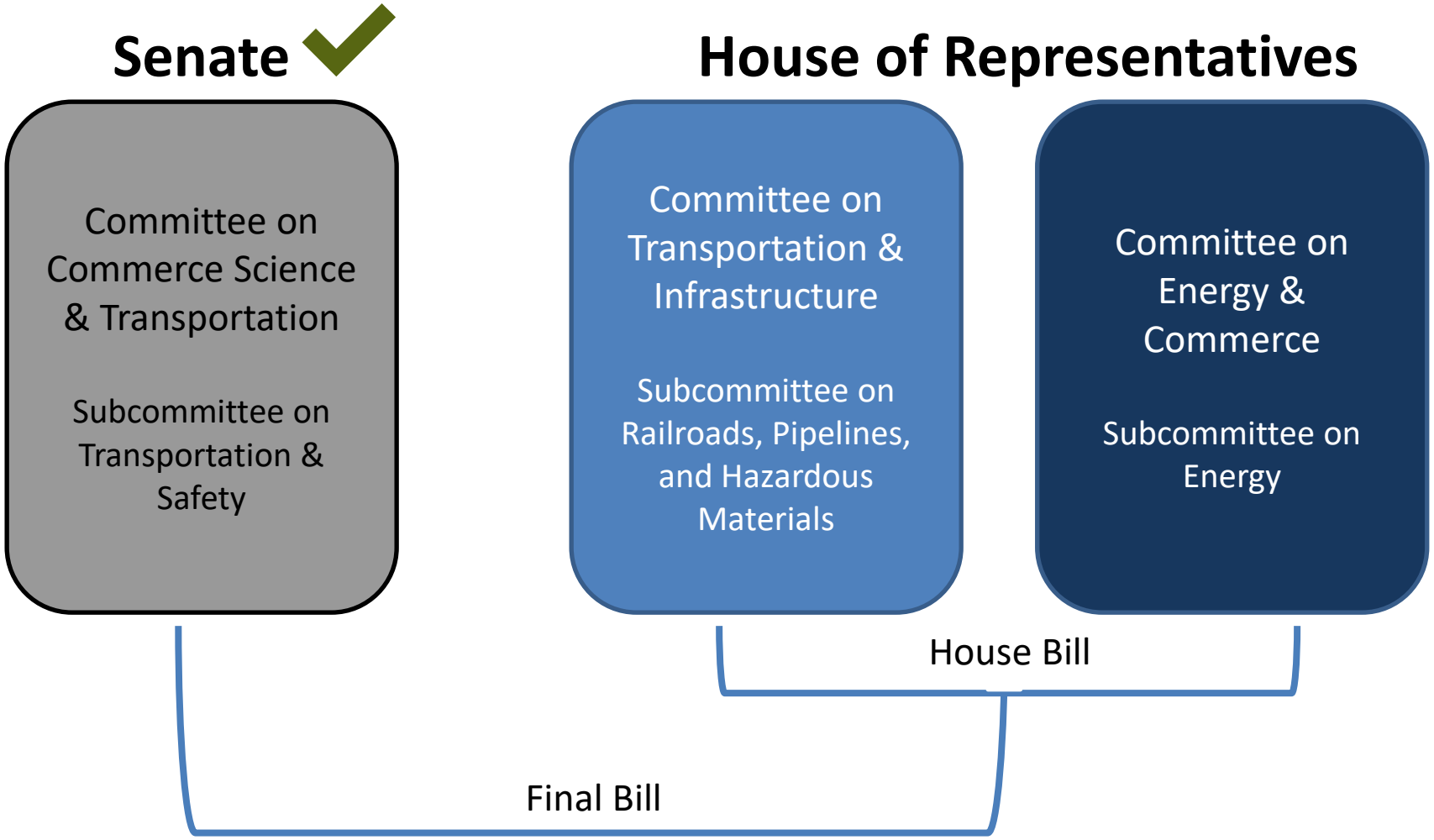
(i) **Repair or replace portions of the service pipeline found to have atmospheric corrosion that could reduce the pipeline's integrity and apply new coating, as necessary, to all affected portions of the service pipeline that are above-ground within 12-months of identification of atmospheric corrosion; or**

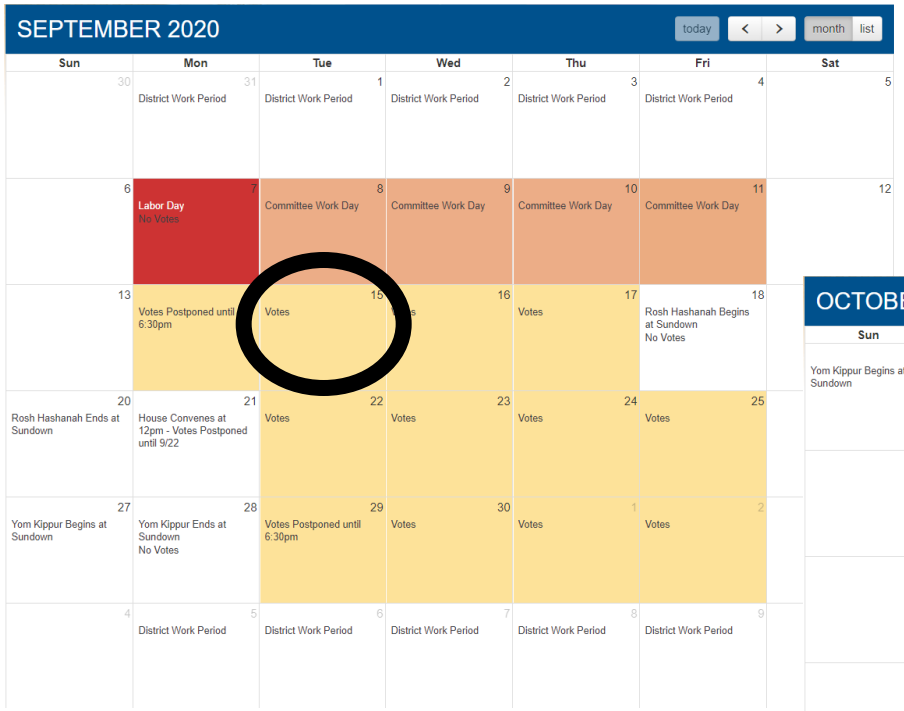
(ii) **Meet the requirements of paragraph (c) of this section and perform** the next inspection of that pipeline or portion of pipeline within 3 calendar years, with an interval not exceeding 39 months.

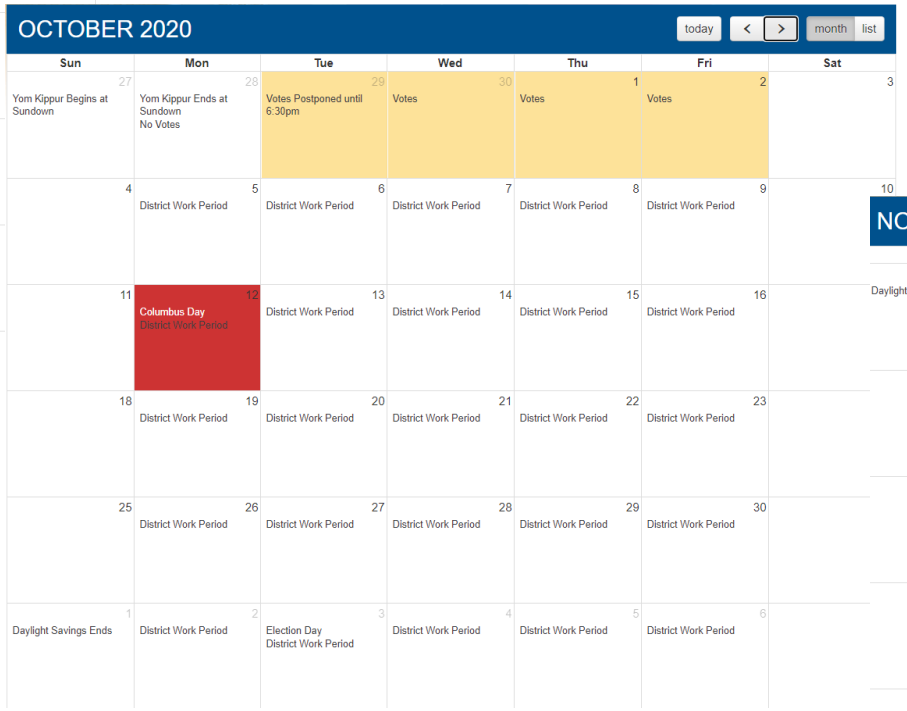
PIPELINE SAFETY UPDATE

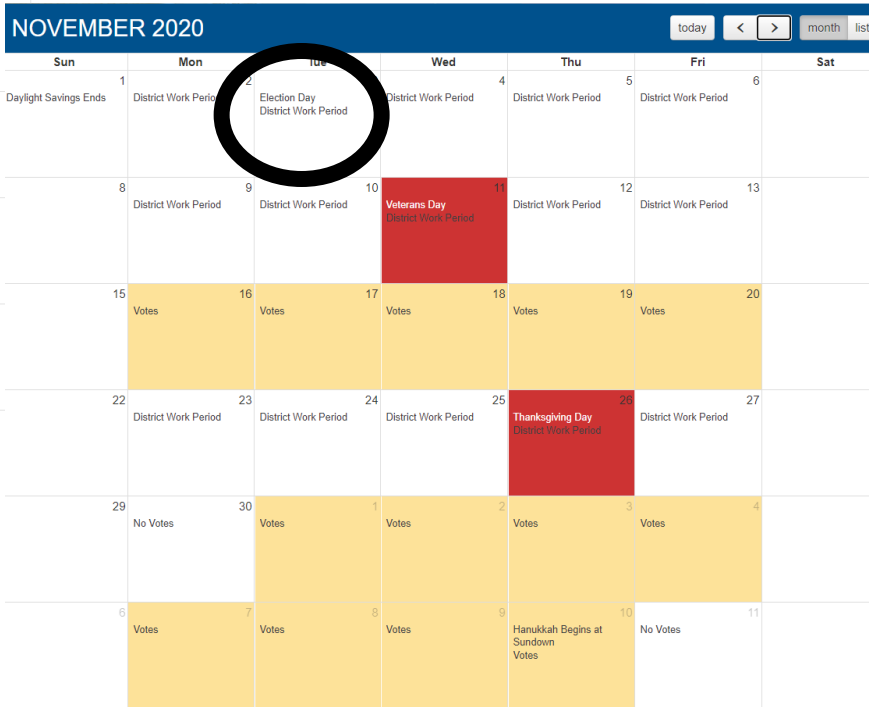
LEGISLATION

Pipeline Safety Reauthorization




SEPTEMBER 2020
today
month
list
Sun
Mon
Tue
Wed
Thu
Fri
Sat
District Work Period
Labor Day
No Votes
Committee Work Day
Votes Postponed until 6:30pm
Votes
Rosh Hashanah Begins at Sundown
No Votes
Rosh Hashanah Ends at Sundown
House Convenes at 12pm - Votes Postponed until 9/22
Yom Kippur Begins at Sundown
Yom Kippur Ends at Sundown
No Votes


OCTOBER 2020
today
month
list
Sun
Mon
Tue
Wed
Thu
Fri
Sat
Yom Kippur Begins at Sundown
Yom Kippur Ends at Sundown
No Votes
Votes Postponed until 6:30pm
Votes
District Work Period
Columbus Day
Daylight Savings Ends
Election Day


NOVEMBER 2020
today
month
list
Sun
Mon
Tue
Wed
Thu
Fri
Sat
Daylight Savings Ends
District Work Period
Election Day
Veterans Day
Thanksgiving Day
No Votes
Votes
Hanukkah Begins at Sundown

14 days….

Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020 (PIPES Act of 2020)

Senate Bill – Passed July 28, 2020

The mandates impacting gas distribution systems include:

1. Leak Detection & Repair
2. Inspection and Maintenance Plans
3. Distribution Integrity Management Plans
4. Emergency Response Plans
5. Operations & Maintenance Manuals
6. Pipeline Safety Management Systems
7. Pipeline Safety Practices

Leak Detection & Repair

PHMSA to write regulations that require operators to conduct leak detection & repair programs that:

1. ‘meet the need for gas pipeline safety’
2. Protect the environment

- The regulation must include ‘minimum performance standards that reflect on the capabilities of commercially available advanced technologies’.
- The leak detection programs shall be able to identify, locate and categorize all leaks that are
  1. Hazardous to human safety or the environment or
  2. Have the potential to become explosive or hazardous to human safety
- Include deadlines for repairing or replacing leaks, except those that are “so small that it poses no potential hazard”
- New pipelines must be capable of ‘continuous monitoring’

Inspection and Maintenance Plans

O&M plans are currently evaluated on:

1. Incorporation of relevant pipeline safety information
2. The appropriateness of the plan for the particular kind of pipeline or facility
3. The reasonableness of the plan
4. The extent to which the plan will contribute to public safety and protect the environment

Inspection and Maintenance Plans

The mandate would require O&M plans be evaluated on:

1. Incorporation of relevant pipeline safety information
2. The appropriateness of the plan for the particular kind of pipeline or facility
3. The reasonableness of the plan
4. The extent to which the plan will contribute to
   A. Public Safety
   B. Eliminating hazardous leaks and minimizing releases of natural gas from pipeline facilities
5. The protection of the environment
6. **The extent to which the plan addresses the replacement or remediation of pipelines that are known to leak based on the material, design, or past operating and maintenance history of the pipeline**

Operators have 1 year from the finalization of the leak detection rulemaking to update their O&M plans.

Distribution Integrity Management Programs

DIMP plans must evaluate for ‘future potential threats’.

- *So operators avoid using risk ranking of zero for low probability events otherwise supported by engineering analysis or operational knowledge.*

Emergency Response Plans

PHMSA to write a regulation that requires operators to establish:

1. Communication with first responders and public officials 'as soon as practicable from the time of confirmed discovery by the operator' of a gas emergency involving the release of gas from a distribution that results in a fire related to:
    1. An unintended release of gas
    2. An explosion
    3. 1 or more fatalities, or
    4. The loss of gas to a significant number of customers
2. 'General public communication through an appropriate channel' if a gas release results in any of the items above.

Emergency Response Plans

PHMSA to write a regulation that:

- Develops and implements a ‘voluntary, opt-in system’ to allow distribution operators to communicate quickly with customers in the event of an emergency.

Operations & Maintenance Manuals

PHMSA to write regulations that require all distribution pipeline operators:

1. Include procedures for responding to an overpressurization incident in their O&M and ERP.
2. Develop a detailed procedure for MOC for significant 'technology, equipment, procedural and organizational' changes.
   - Must ensure that a relevant qualified personnel, such as
     - an engineer with a professional licensure
     - subject matter expert, or
     - other employee who posses the necessary knowledge, experience and skills regarding the natural gas distribution systems

     review and certify construction plans for accuracy, completeness, and correctness.

Plans: DIMP, ERP, O&M

1. Requires operators to provide PHMSA or state regulators with their plans for review within 2 years of the finalization of the legislation.
2. The plans are to be reviewed every 5 years.
3. The operator must inform their regulator within 60 days of a significant change.

Notes:

- *Significant changes* to be defined by PHMSA via rulemaking.
- All documentation provided falls under existing FOIA exemptions.

Pipeline Safety Management Systems

PHMSA to report to Congress:

1. The number of gas distribution operators that have committed to voluntarily adopting PSMS
2. The *level* of adoption including identification of gaps and progress towards filling those gaps.
3. If it is infeasible for gas distribution operators under a certain size (customer count) to implement PSMS.

PHMSA and the states to:

1. Promote PSMS
2. Develop a methodology for assessing PSMS frameworks. PSMS should promote self-disclosure of errors and deviations from regulatory standards.

Pipeline Safety Practices

PHMSA to write regulations that require:

1. Distribution operators to have traceable, verifiable, and complete records to ensure proper pressure controls on their systems (MAOP).
2. Operators to collect and update records on an "opportunistic basis."
3. The records must be submitted or made available to PHMSA and the states
4. An OQ'd individual to monitor gas pressure at reg stations or at gas control during any construction project that has the potential to cause an overpressurization
5. Operators to assess and upgrade (as appropriate) district regulator stations to ensure
    1. No common mode of failure
    2. Low pressure systems are monitored near critical pressure-control equipment
    3. There is back-up over pressure-protection equipment, such as a relief valve*

* *If this is not feasible an alternative requirement should be codified that will minimize the risk of an overpressurization event.*

APGA UPDATE

EVENT CALENDAR

Industry Virtual Mutual Aid Series

Online | September 16 & 30

APGA Member Roundtable: Mock Drills

Online | October 2, 2020

APGA PSMS Virtual Series

Online | October - January

APGA Operations Conference

Online | October 19-November 6

APGA Resources

- Pipeline Safety Management Systems (PSMS) Gap Analysis Tool
- APGA Benchmarking Tool
- GOAL (Gas Overall Awareness Level)
- APGA Mutual Aid Program

- APGA Security & Integrity Foundation (www.apgasif.org)
  - SHRIMP (Simple Handy Risk-based Integrity Management Plan)
  - Anti-Drug & Alcohol Plan Development Tool

Questions?

Thank you for your time today!

Erin Kurilla
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Rectifier Readings *§192.465(b)*

Current	Proposed	Industry Comments
Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding $2\frac{1}{2}$ months, to insure that it is operating	~~Each~~ **C**athodic protection rectifier or other impressed current power source must be **periodically** inspected **as follows:** **(1) Each cathodic protection rectifier or impressed current power source must be inspected** six times each calendar year, but with intervals not exceeding 2 1⁄2 months **between inspections**, to ensure **adequate amperage and voltage levels needed to provide cathodic protection are maintained. This may be done either through remote measurement or through an onsite inspection of the rectifier.** ~~that it is operating.~~ **(2) Each remotely monitored rectifier must be physically inspected for continued safe and reliable operation whenever cathodic protection tests are performed pursuant to §192.465(a).**	Cathodic protection rectifier or other impressed current power source must be periodically inspected as follows: (1) Each cathodic protection rectifier or impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2 1⁄2 months between inspections, to ensure adequate amperage and voltage levels needed to provide cathodic protection are maintained. This may be done either through remote measurement or through an onsite inspection of the rectifier. (2) Each remotely monitored rectifier must be physically inspected for continued safe and reliable operation **at the frequency of cathodic protection tests required under** ~~**whenever cathodic protection tests are performed pursuant to**~~ §192.465(a).