

REGULATORY UPDATE
2021 PIPELINE SAFETY SEMINAR
DECEMBER 7, 2021
MONTGOMERY, ALABAMA

Wallace Jones

Director, Gas Pipeline Safety

Alabama Public Service Commission

RECENT PHMSA Items:

❖ **PHMSA-2020-0164: FAQs for 911 Notification**

❖ **NTSB recommendation from San Bruno**

Require operators of natural gas transmission and distribution pipelines and hazardous liquid pipelines to ensure that their control room operators immediately and directly notify the 911 emergency call center(s) for the communities and jurisdictions in which those pipelines are located when a possible rupture of any pipeline is indicated. (P-11-9)

❖ **PHMSA-2021-0050: Update Inspection and Maintenance Plans To Address Eliminating Hazardous Leaks and Minimizing Releases of Natural Gas From Pipeline Facilities (ADB-2021-01)(Section 114 of PIPES Act)**

❖ **December 27, 2021**

Gas Rule:

Split into 3 separate regulations -

“RIN 1” - Safety of Gas Transmission Pipelines:

MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments

- Final Rule Published October 1, 2019

“RIN 2” - Repair Criteria, IM Improvements, Cathodic Protection, Management of Changes, and Other Related Amendments

- Final Rule under Department Review**
- Possible release in first or second quarter of 2022
(March or April)**

“RIN 3” - Gas Gathering

- **Final Rule released on November 15, 2021**

- **Effective Date of May 16, 2022**

- ❖ **Two new types of Gathering lines are defined in 191.3 and 192.8**

- ❖ A “Type C Gathering Line” is a line that operates above 20% SMYS (or > 125 psig for non-metallic lines or when SMYS is unknown), located in a Class 1 location, and is greater than 8 5/8” in diameter. It would be a Type A Gathering line if it was in a Class 2 through 4 location

- ❖ A “Type R Gathering Line” is any other definitional Gathering line that isn’t Type A, B, or C. These lines are subject to some reporting requirements in Part 191 now, but nothing in Part 192. The logic is PHMSA is getting information on the safety risks associated with these lines to see if future regulation is necessary or not

“RIN 3” - Gas Gathering

- ❖ All Gathering lines are now subject to Annual Reporting, Incident Reporting, and Safety Related Condition reporting. They do not have to submit data to the National Pipeline Mapping System though. Part 191 requirements become effective on the effective date of the rule (May 16, 2022).

“RIN 3” - Gas Gathering

PHMSA added language governing “incidental gathering” as defined in RP80. For any new, replaced, relocated, or otherwise changed gathering pipe installed after the effective date of the rule - pipe cannot be classified as “incidental gathering” if the pipeline terminates 10 or more miles downstream from the furthestmost downstream endpoint as defined in Section 2.2 or RP80. If the segment is longer than 10 miles the line must be classified as Transmission.



“RIN 3” - Gas Gathering

Operators must have records describing the methodology by which they determined the beginning and end point of their Gathering system and keep them for the life of the pipeline. This has to be done within 6 months of the rule's effective date. There is also some language about how operators need a “safety buffer” for Type B gathering in Class 2 locations.



“RIN 3” - Gas Gathering

Design and testing of a new, replaced, relocated, or otherwise changed Type C gathering line has to be done by following Subparts B through G and Subpart J of the Regulations.

Type C lines must follow Subpart I Corrosion as if they were Transmission lines, except for 192.493 which covers ILI.



“RIN 3” - Gas Gathering

Type C lines must have and follow a damage prevention, public awareness, and emergency response plan.

Type C lines must perform leak surveys and are subject to the line marker requirements for transmission lines.

Operators of Type C lines have one year after the effective date of the rule to start complying



“RIN 3” - Gas Gathering

Type C lines with a diameter above 12.75” have to establish a MAOP. If the line is 16” or less, they don’t have to do it if the line is located within a potential impact circle or not in a class location unit with “an occupied building or other impacted site”.; If a line segment of 40 feet or less is repaired, replaced, etc. the MAOP requirement doesn’t apply.

The rule clarifies that 192.150 Passage of Internal Inspection devices does not apply to gathering lines.

“RIN 3” - Gas Gathering

The rule defines composite materials and spells out what information operators have to provide to PHMSA if they install new or replacement composite pipe. The rule says operators have to notify PHMSA (or state) 90 days before installing and PHMSA has 90 days to review and tell the operator to stop if they don't like it, otherwise the operator automatically has approval. Composites will likely be addressed in a future rulemaking.

December 15 deadline for “Petitions for Reconsideration”



PHMSA/NAPSR News of Interest to States:

- **New Training and Qualifications (TQ) Director named; Lane Miller**
- **Section 114 of Pipes Act – possible public webinars later this month to go over to share guidance information**
- **Biogas – NAPSR Task Group working on issues relating to new facilities**
- **Inspection intervals – some inspections might be done sooner due to PHMSA language**

Damage Reporting:

37-15-9(c) of the Alabama Code – “If an event damages any pipe, cable or its protective covering, or other underground facility, or there is a significant near miss that could have resulted in damage, the operator receiving the notice shall file a report with the “One-Call Notification System”. Reports must be submitted annually to the System, no later than March 31 for the prior calendar year. . . .”



Most 3G cellular networks will be shut down by the end of the year. There is a potential that many RTU's could have a 3G data input or use it as a backup. Operators should ensure they are aware of the shut down of the 3G networks. More information can be found at the link below:

The link to the FCC page about this is as follows:

<https://www.fcc.gov/consumers/guides/plan-ahead-phase-out-3g-cellular-networks-and-service>

Plastic Fusion Qualifications:

You only need to qualify once each year; if you have qualified less than 10 months prior to attending a class, you will **NOT** receive your certificate.

You must check all information on the qualification form. Names, social security numbers, birthdates, **MUST** match what we have on previous forms. If not, you will **NOT** receive your certificate.

Alabama Public Service Commission

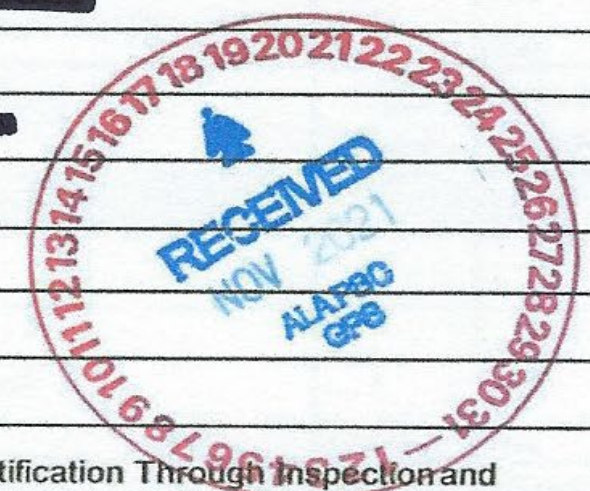
Certification # 10004

Gas Pipeline Safety Plastic Fusion Qualification Form

Revision 11-5-17

Please Complete all the Personal, Class and Company Information Below

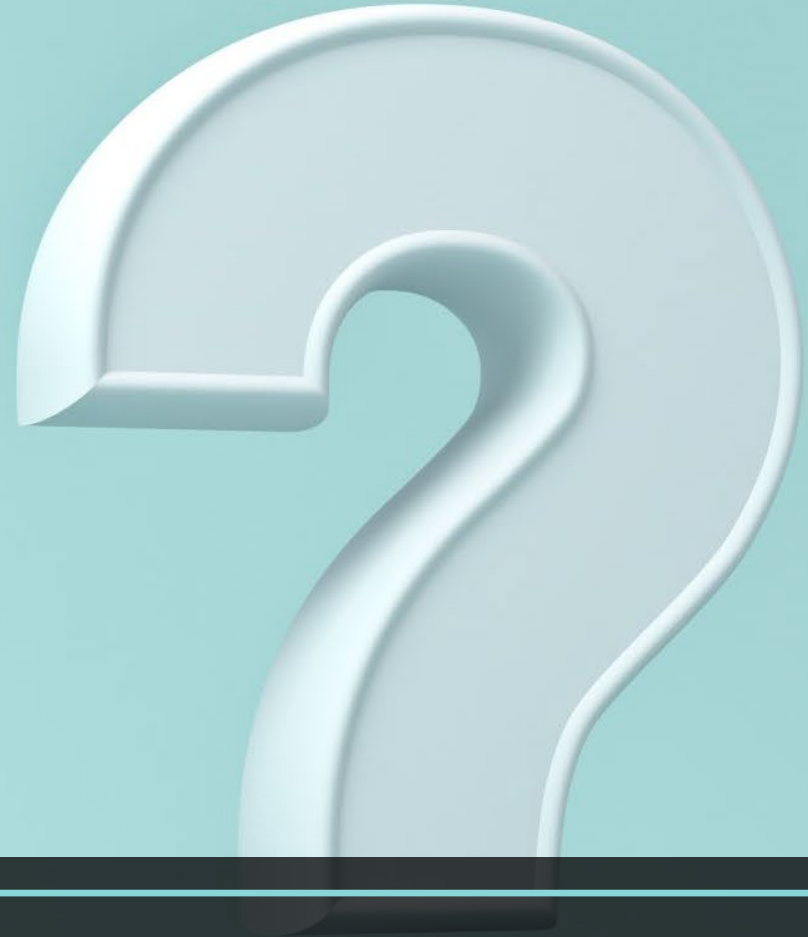
Personal Information				Class Information	
Name	[REDACTED]			Date	[REDACTED]
Signature	[REDACTED]			Class Location	[REDACTED]
Home Telephone	[REDACTED]			Company Information	
Address	[REDACTED]			Name	[REDACTED]
City	[REDACTED]			Telephone	[REDACTED]
State	[REDACTED]	Zip	[REDACTED]	Address	[REDACTED]
Date of Birth	01/09/2028			City	[REDACTED]
You Must Provide The Last 4 Digits of Your Social Security Number				State	[REDACTED]
SSN	XXX-XX-[REDACTED]				



Everything Below This Line To Be Completed by Instructor

All Pipe and Fittings Must Comply with Applicable Requirements Found in ASTM D2513 and CFR 49 §192.59. Certification Through Inspection and Deconstructive Testing Performed by a Qualified Instructor in Accordance with CFR 49 § 192.281, § 192.283, and § 192.285. *MDPE (Medium Density Polyethylene) **HDPE (High Density Polyethylene) *** PA11 (Polyamide Resin 11)

Butt Fusion					
Pipe Material	Procedure	MDPE*	HDPE**	MDPE*to HDPE**	
Polyethylene Medium and High Density Resins Compatible with PPI MS-2 and ATSM D2513 and Manufacturers	<input type="checkbox"/> UNV PPI TR-33 (and TR-13) Generic Butt Fusion Joining Procedure for Polyethylene Gas Pipe and General Guidelines for Butt, Saddle, and Socket Fusion of Unlike Polyethylene Pipes	2708	4710		
		Passed <input checked="" type="checkbox"/>	Passed <input type="checkbox"/>	Passed <input type="checkbox"/>	



QUESTIONS ?