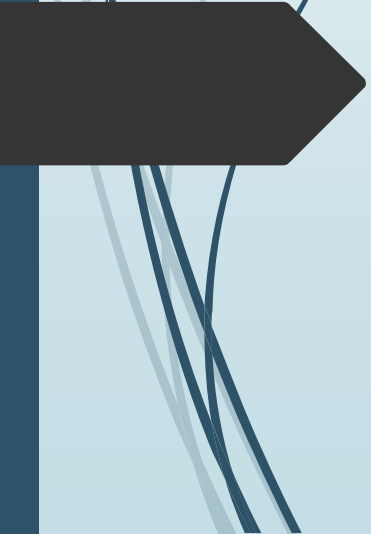


# **2024 Alabama Pipeline Safety Program updates**



**Jonathan M. Kimbril  
Gas Pipeline Safety  
Director**

# Staffing breakdown

## ■ Office Staff

- Director – Jonathan Kimbril
- Administrative Assistant (The Boss) – Felisa Webster

## ■ Northern Section

- Supervisor – Shawn Emmons (Acting)
- Pipeline Safety Investigator – Kevin Key
- Pipeline Safety Investigator – Jeremy Humphries

## ■ Central Section

- Supervisor – Daniel Trapp
- Senior Investigator – Randy Hammond

## ■ Southern Section

- Supervisor – Shawn Emmons
- Investigator – Brett Cochran
- Investigator – Kyle Childs

## ■ Training Coordinator

- Senior Investigator – Randall Hand



# Alabama Operator breakdown

- Distribution – 74
- Transmission – 27
- Gas Gathering – 4
- Master Meter – 11
- Refined Products – 4
- Crude Oil -5
- LNG Plants – 5
  - 2 peak shaving plants
  - Tanks – 7



# 2024 Program Accomplishments

- Our program was able to maintain an adequate on damage prevention.
- Scored 100 out of 100 on the natural gas program
- Scored 96 out of 96 on the liquids program.
- PSA's were aired in August and September in support of Alabama 811 and the ALUDPA



# Pipeline Safety program findings

## 1 - GPS Procedures

- **Issue:** Current GPS Procedures do not align with the actual violation process, leading to oversight during inspections.
- **Recommendation:** Revise GPS Procedures to ensure alignment with the actual violation process and conduct thorough inspections accordingly.

## 2 - Violation Process

- **Issue:** The existing violation process lacks clarity on its progression towards issuing safety issue letters and conducting show cause hearings.
- **Recommendation:** Clarify the violation process to accurately reflect the steps leading to safety issue letters and show cause hearings.



# Pipeline Safety program findings

## 3 - Violation Tracking Procedures

- **Issue:** Procedures for tracking violations do not specify responsibilities or monitoring time frames for compliance, leading to inefficiencies.
- **Recommendation:** Revise Violation Tracking Procedures to define responsibilities and establish clear monitoring mechanisms for compliance time frames.

## 4 - State and Federal Incident Response

- **Issue:** Procedures for handling state and federal incidents lack specificity regarding personnel response criteria and actions required.
- **Recommendation:** Update procedures to include criteria for personnel response to state and federal incidents, exemptions for certain situations, and establish clear decision-making protocols.



# Pipeline Safety program findings

## 5 - Emergency Contact Process

- **Issue:** The current process for providing emergency contact information to operators is insufficient, PHMSA believes challenging for Operators to easily access current and accurate information.
- **Recommendation:** Develop a robust process for providing emergency contact information to operators, ensuring accessibility and accuracy.

## 6 - Training Procedure

- **Issue:** The training procedure lacks clear criteria for determining when an inspector is qualified beyond PHMSA T&Q classes.
- **Recommendation:** Enhance the training procedure to include benchmarks such as time on the job, experience, and industry-standard training, with decisions made by the Program Manager.



# Pipeline Safety program findings

## 7 - Qualification Documentation

- **Issue:** Procedures do not adequately detail how inspectors are deemed qualified or provide documentation of qualifications.
- **Recommendation:** Specify the process for determining inspector qualifications and document qualifications with clear records of who made the determination and when.





# Pipeline Safety program findings

## 8 - Follow-up Inspections Procedure:

- **Issue:** Follow-up inspections are necessary to address violations where a VP level member of the Operator's staff is present, and a letter must be sent documenting the violation and its correction.
- **Recommendation:** Enhance the follow-up inspection procedure to ensure effective correction of violations and proper documentation:
  - Specify the process for correction and the necessary attendees during follow-up inspections.
  - Include provisions for sending a formal letter to the VP level member of the Operator's staff, confirming the closure of the violation, and providing them with a record of the resolution.



# Pipeline Safety program findings

## 9 - Field Inspection Documentation

- **Issue:** current forms currently do not adequately detail what inspectors are checking for in each type of field inspection.
- **Recommendation:** Modify current forms to detail the process for inspector to use during field inspections.



# Gas program Findings Continued

- 1 Point loss occurred on question C-2, for the Gas program, which assesses if the program manager has demonstrated adequate knowledge of the PHMSA pipeline safety program and associated regulations. It's PHMSA's practice to deduct points on this evaluation question if the program manager has been in the position for less than a year. Jonathan Kimbril has been Acting Director since October 2022, following the retirement of the previous program manager, thus in the position for less than a year.
- 2 points were lost for the Gas Pipeline Safety Program on question D-7. Question D-7 examines if the state followed compliance procedures (from discovery to resolution) and adequately documented all probable violations, including what resolution or further course of action was needed to gain compliance. State Guidelines 5.1.5., states, in part, "...a written compliance action detailing the probable violations shall be sent with the program manager's signature (or higher-level state agency official) to a company officer



# Concerns driving new Gas Pipeline Safety Rules

Despite Alabama's update to its one call law, operators have shown limited utilization of the updated system. Although complaints regarding violations persist, operators are not submitting reports on these violations as expected. Data indicates a decrease in submitted violations, dropping from approximately 60 per quarter in year one to about 50 per quarter in year two under the new law. Additionally, it's concerning that no enforcement actions have been taken by either the damage prevention authority or gas pipeline safety against operators known to have violated the damage prevention law.

- **Promoting Awareness and Compliance:** Highlight the importance of strict adherence to the updated one call law among operators. Provide clear guidance and support to ensure proper understanding and compliance with damage prevention regulations.
- **Enhanced Collaboration:** Foster better communication and collaboration between the damage prevention authority, gas pipeline safety, and operators. This collaboration can help adapt the reporting processes and enhance enforcement efforts.



# Concerns driving new Gas Pipeline Safety Rules

Operator Qualification (OQ) plans lack specificity, making it challenging to adequately demonstrate if qualifications have been met. These plans primarily outline methods that can be used without detailing the specific requirements for the method chosen. Additionally, a significant number of plans do not explicitly state which positions are responsible for specific tasks, leading to ambiguity in job roles. Furthermore, the evaluation processes lack clear criteria defining what qualifies as an acceptable evaluation standard.

- **Enhanced Evaluation Procedures:** Improve the evaluation processes by incorporating clear criteria that define acceptable evaluation standards. This should establish specific benchmarks or standards for evaluators.
- **Training and Guidance:** Provide clear approved methods and requirements to operators so OQ plans adequately address conducting evaluations for initial qualification and requalification.
- **Establish Continued Education:** Operators should put forth equal effort to continuously learn current code requirements along with updated or changed code on a reoccurring biases.



# Concerns driving proposal to modify state laws

- There's been a developing financial strain within the Gas Pipeline Safety program. The burden has been falling solely on distribution for funding Gas Pipeline Safety. The fee remained the same for over four decades at 50 cents per service riser. The current proposals aim to address this imbalance by raising the fee to \$1.00 per service riser and establishing minimum fees for gas distribution, gas transmission, gas gathering, and hazardous liquid lines. Additionally, a plan to introduce mileage-based fees across these sectors other than distribution mains. There have been discussions regarding the potential implications of these proposed fee adjustments on the operational aspects and regulatory efficiency of the Gas Pipeline Safety program.



# **Bipartisan Infrastructure Law AKA Cast Iron replacement Grant**

I was part of the review team with PHMSA for this year's applications, and I'd like to share some key observations. Documentation and records play a major role in the project approval process. When the records do not match the statements provided, it triggers a much closer inspection of the materials submitted. For instance, if materials in your system are stated to be a high safety concern but are not even ranked in the DIMP plan's risk rankings, there is already a problem. Similarly, if the DIMP plan lists the material and states that no enhanced actions are necessary, that is another issue. Additionally, if the figures provided do not match those in the annual report, that is a red flag. Detailed quotes need to be provided, and if the cost figures are significantly above standard industry prices, it raises concerns. These discrepancies or failures to provide necessary details create problems that need to be addressed before moving forward in the review process.



**Questions?**