Reporting 191 & 192.18 Notification

192.18 Notification

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Unless otherwise specified, if an operator submits, pursuant to § 192.8,
§ 192.9, § 192.13, § 192.179, § 192.319, § 192.461, § 192.506, § 192.607,
§ 192.619, § 192.624, § 192.632, § 192.634, § 192.636, § 192.710,
§ 192.712, § 192.714, § 192.745, § 192.917, § 192.921, § 192.927,
§ 192.933, or § 192.937, a notification for use of a different integrity
assessment method, analytical method, compliance period, sampling
approach, pipeline material, or technique (e.g., "other technology" or
"alternative equivalent technology") than otherwise prescribed in those
sections, that notification must be submitted to PHMSA for review at least
90 days in advance
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The definition of operator varies between 192 & 195

- Per 192.3--*Operator* means a person who engages in the transportation of gas.
- Per 195.3--Operator means a person who owns or operates pipeline facilities.—
- Annual Reporting must be made by the operator what is the OPID for the OWNER
- What is the name associated with the OPID—that is who files.

Reporting Part 191

- Data and Statistics
- https://www.phmsa.dot.gov/data-andstatistics/pipeline/gas-distribution-gas-gathering-gastransmission-hazardous-liquids

Incident Reporting 191.3

- An event that involves a release of gas from a pipeline, gas from an (*UNGSF*), LNG pipeline or facility, LPG, refrigerant gas, and that results in one or more of the following consequences:
- (i) A death, or personal injury requiring in-patient hospitalization;
- (ii) Estimated property damage of \$122,000 or more, including loss to the operator and others, or both, but excluding the cost of gas lost. For adjustments for inflation observed in calendar year 2021 onwards, changes to the reporting threshold will be posted on PHMSA's website. These changes will be determined in accordance with the procedures in appendix A to part 191.
- (iii) Unintentional estimated gas loss of three million cubic feet or more.

Year	Effective Dates	Threshold		
2024	July 1, 2024 through June 30, 2025	\$145,400		

Incident Reporting 191.3

Reports should be accurate—must be one of those new self driving trailers. Incident report indicated 20 psig operating pressure, 60 psig MAOP—Did narrative indicate if EFV tripped????

PART H - NARRATIVE DESCRIPTION OF THE INCIDENT

Call received @ 21:07 on August 16, 2023. Police Dept reporting that trailer backed over gas meter. Call was then updated to state that home is now on fire and fire dept is in route. Emergency order created and dispatched to first responder @ 21:16. First responder arrived 21:36, meter was off by Fire Dept upon arrival. Upon further investigation, the regulator was damaged by the vehicle that struck it and was removed at the request of the fire department later that evening. During the investigation it was determined that the neighbor struck the meter installation causing the leak that was originally reported. Upon receiving estimated damages from Fire Report on August 17, 2023, it was determined that incident criteria was met and call was made to NRC.

DARTH DREDARED AND AUTHORIZED DEDGON

Incident Reports 191

- 191.5 At the earliest practicable moment following discovery, but no later than one hour after confirmed discovery.....
- Names of **operator** and person making report and their telephone numbers, location of the incident, time of the incident, number of fatalities and personal injuries, if any, significant facts that are known.
- Within 48 hours after the confirmed discovery of an incident, any changes and confirmation of initial report
- Alabama Reporting Requirements
 770-X-7-.09 Telephonic Reporting of Accidents/ Incidents within 1 hour
- Alabama Reporting Requirements
 770-X-7-.10 Accident/Incident Reporting within 30 days

Submitting Reports 191.7

- Must be made electronically <u>http://portal.phmsa.dot.gov/pipeline</u>
- Except SRC's
- If electronic reporting imposes an undue burden and hardship, an operator may submit a written request:

Information Resources Manager
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety
Administration, PHP-20, 1200 New Jersey Avenue, SE,
Washington DC 20590

Submitting Reports 191.9 Distribution Incident

- Each operator of a distribution pipeline system shall submit DOT Form RSPA F 7100.1 as soon as practicable but not more than 30 days after the detection of an incident required to be reported under 191.5.
- When additional relevant information is obtained after the initial report is submitted the operator shall make supplementary reports as deemed necessary with a clear reference by date and subject to the original report.
- Master meters are not required to submit an incident report.

Reporting 191.11 Distribution Annual Report

- Must submit an annual report for that system on DOT Form PHMSA F 7100.1-1. This report must be submitted each year, not later than March 15, for piping in place as of December 31 of the preceding calendar year.
- Not required. The annual report requirement in this section does not apply to a master meter system, a petroleum gas system that serves fewer than 100 customers from a single source, or an individual service line directly connected to a production pipeline or a gathering line other than a regulated gathering line as determined in § 192.8.

Reporting 191.11

Annual report Instructions

• https://www.phmsa.dot.gov/forms/operator-reports-submitted-phmsa-forms-and-instructions

4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	1
4b. City and County	
4c. State	LA
4d. Zip Code	
5. STATE IN WHICH SYSTEM OPERATES	LA
6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY complete the report for that Commodity Group. File a separate report	GROUP (Select Commodity Group based on the predominant gas carried and rt for each Commodity Group included in this OPID.)
Natural Gas	
7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OP included in this OPID for which this report is being submitted.):	ERATOR (Select Type of Operator based on the structure of the company
Municipal Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL										
	UNPROTECTED		CATHODICALLY PROTECTED		PLASTIC	CAST/ WROUGHT IRON	DUCTILE	COPPER	OTHER	RECONDITION ED CAST IRON	SYSTEM TOTAL
	BARE	COATED	BARE	COATED]						
MILES OF MAIN	0	0	0	0	11	0	0	0	0	0	11
NO. OF SERVICES	0	0	0	18	526	0	0	0	0	0	544





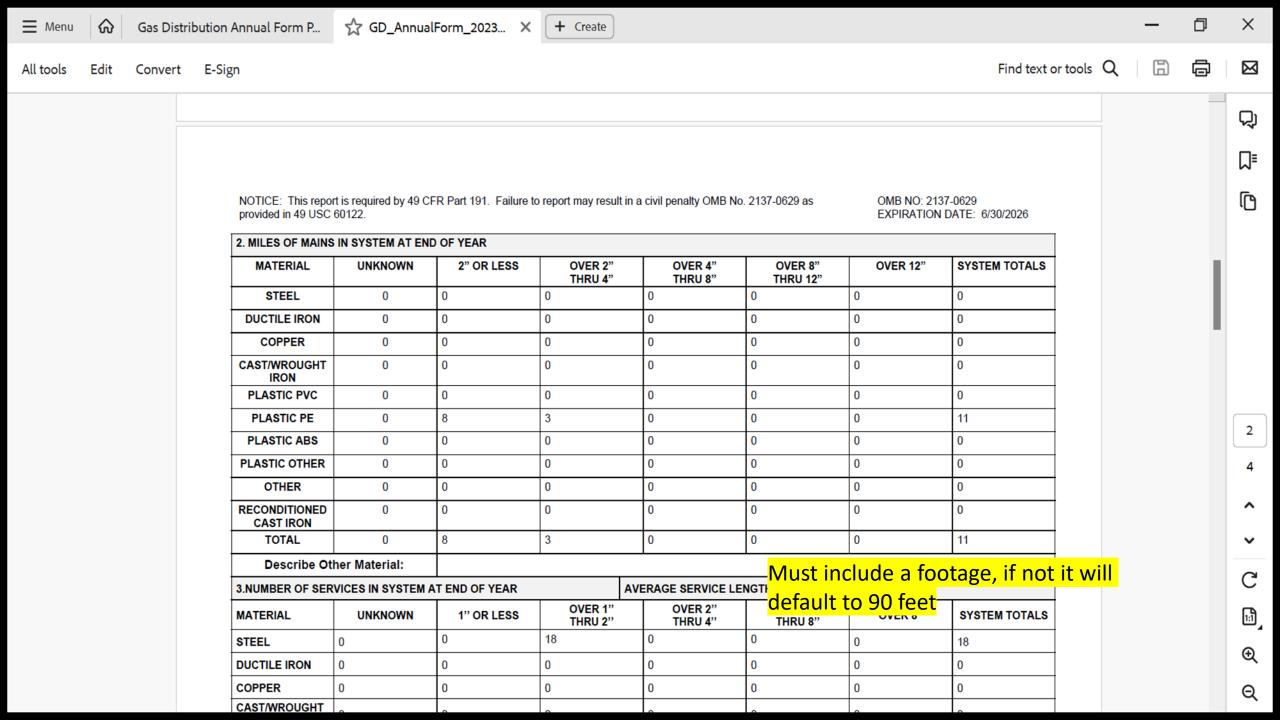


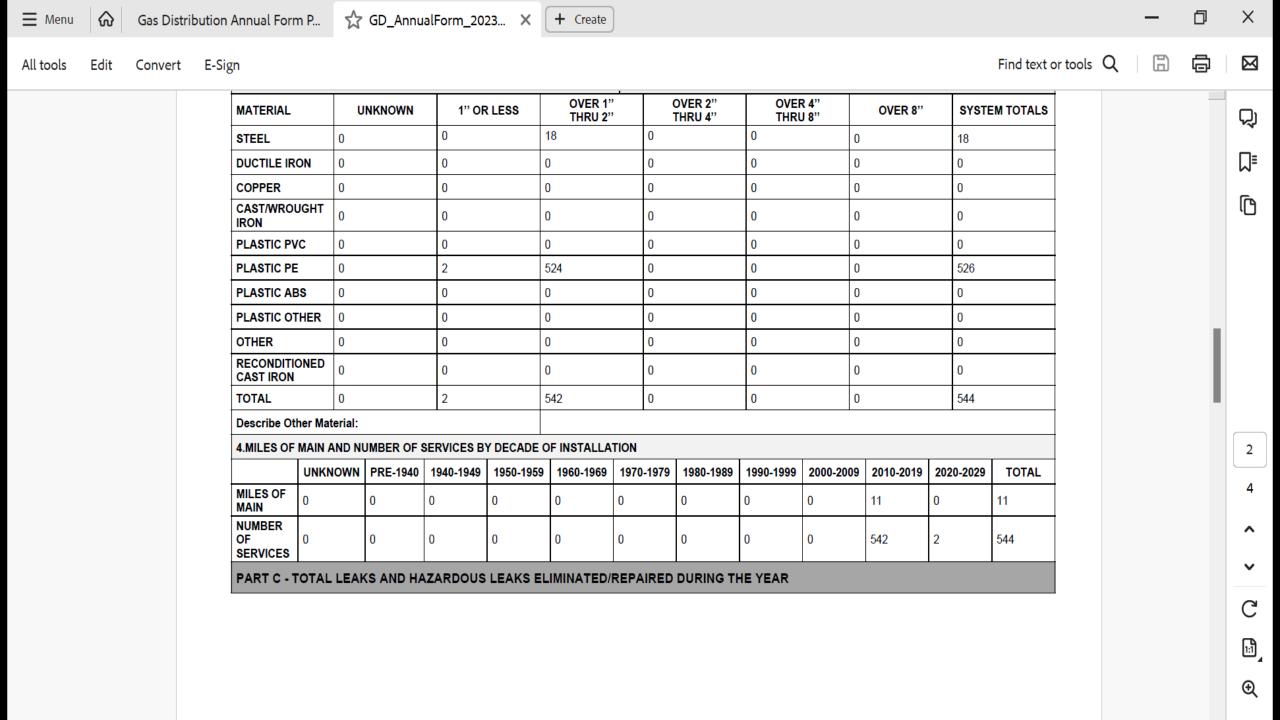


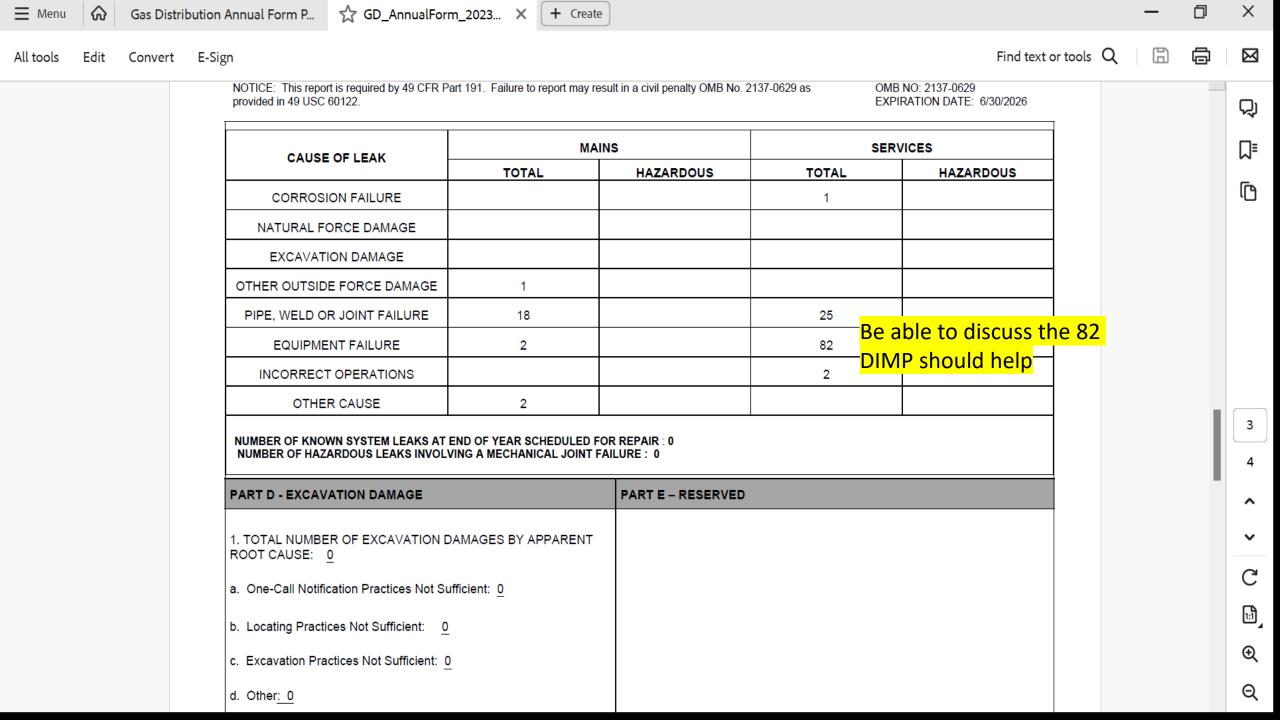


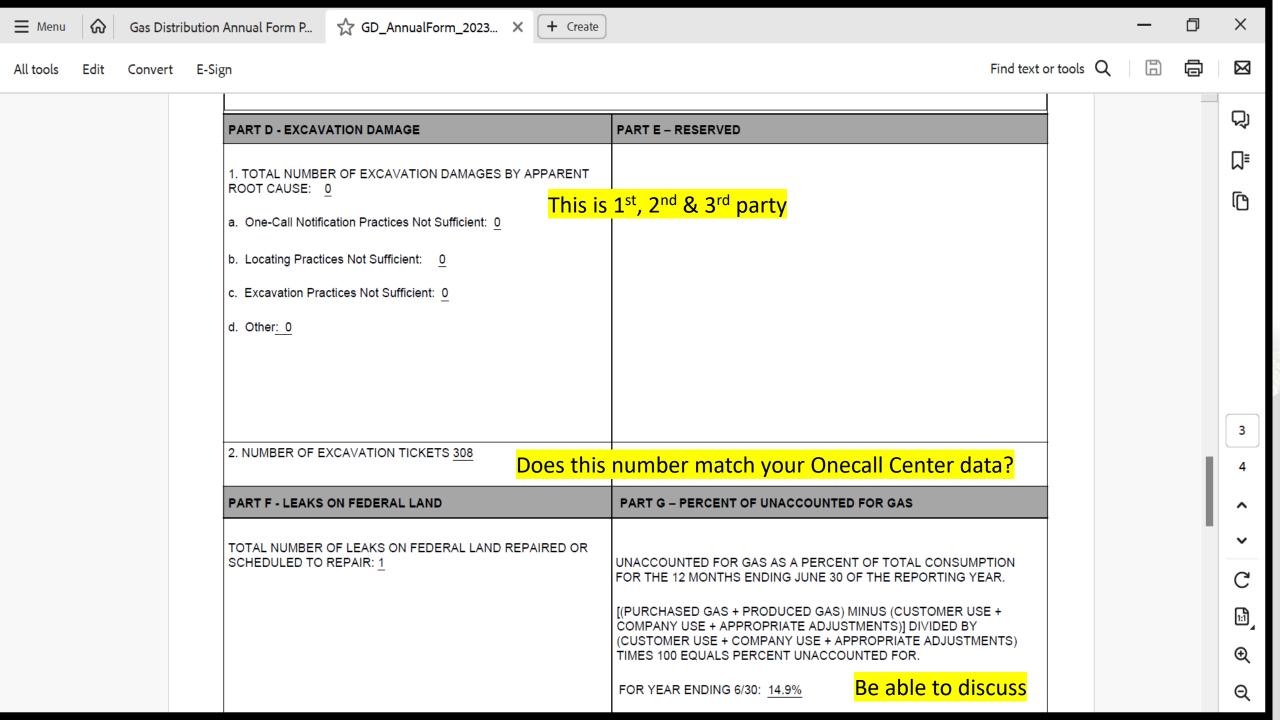












NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629 EXPIRATION DATE: 6/30/2026

PART H - ADDITIONAL INFORMATION					
PART I - PREPARER					
-	(
(Preparer's Name and Title)	(Area Code and Telephone Number)				
	<u>(</u>				
(Preparer's email address)	(Area Code and Facsimile Number)				

PREPARER is the name of the person most knowledgeable about the report or the person to be contacted for more information. Please include the direct phone number and email address as applicable (e-mail address is desired but not required). It should be noted that PHMSA will use your e-mail address to issue correspondence that is normally sent via mass mailings. "Correspondence" includes notifications such as the annual reminder letter for Annual Report filings.









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Reporting 191.13

• Each operator, primarily engaged in gas distribution, who also operates gas transmission or gathering pipelines shall submit separate reports for these pipelines as required by §§191.15 and 191.17

Reporting 191.15 Incidents

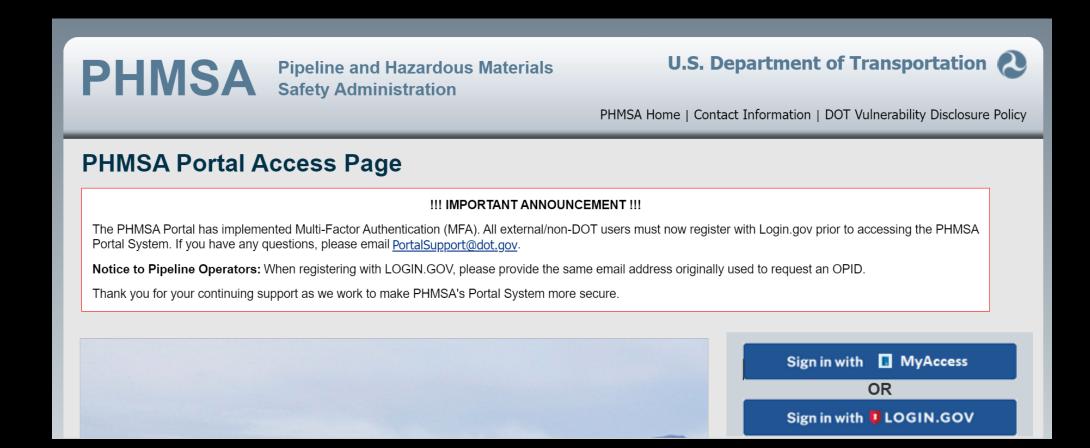
- Operators of a transmission, offshore gathering, or a regulated onshore gathering pipeline system must submit Department of Transportation (DOT) Form PHMSA F 7100.2—ASAP within 30 days of an incident
- Reporting-regulated gathering. (TYPE R) Each operator of a reporting- regulated gathering pipeline system must submit DOT Form PHMSA F 7100.2-2 ASAP but within 30 days

Remember Vacuum Lines

- LNG gas plant or facility must submit DOT Form PHMSA F 7100.3 ASAP but within 30 days after detection of an incident required to be reported under § 191.5 of this part.
- Each operator of a UNGSF must submit DOT Form PHMSA F7100.2 ASAP but within 30 days after the detection of an incident required to be reported under § 191.5.

Reporting 191.17 Trans, Gathering, LNG, UNGS, Annual Reports

ALL DUE BY MARCH 15 of each year



National Registry 191.22

- Changes for UNGSF, LNG plant, or LNG facility must notify PHMSA electronically through the National Registry of Operators at https://portal.phmsa.dot.gov of certain events.
- (1) An operator must notify PHMSA not later than 60 days before the event occurs:
- (i) Construction of any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs \$10 million or more. If 60-day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable; States might have requirements---KEEP IN MIND
- (ii) Construction of 10 or more miles of a new pipeline;
- (iii) Construction of a new LNG plant, LNG facility, or UNGSF;
- (iv) Maintenance of a UNGSF that involves the plugging or abandonment of a well, or that requires a workover rig and costs \$200,000 or more for an individual well, including its wellhead. If 60-days' notice is not feasible due to an emergency, an operator must promptly respond to the emergency and notify PHMSA as soon as practicable.
- (v) Reversal of product flow direction when the reversal is expected to last more than 30 days. This notification is not required for pipeline systems already designed for bi-directional flow; or
- (vi) A pipeline converted for service under § 192.14 of this chapter, or a change in commodity as reported on the annual report as required by § 191.17.

National Registry 191.22

- Must notify PHMSA of any of the following events not later than 60 days after the event occurs:
 - A change in the primary entity responsible
 - A change in the name of the operator;
- (iii) A change in the entity responsible for an existing pipeline, pipeline segment, pipeline facility, UNGSF, or LNG facility;
- (iv) The acquisition or divestiture of 50 or more miles of a pipeline or pipeline system
- (v) The acquisition or divestiture of an existing UNGSF, or an LNG plant or LNG facility subject to part 193 of this subchapter.

Reporting 191.23 Reporting safety-related conditions

- A pipeline (other than an LNG facility) that operates at 20% or more of SMYS-- general corrosion, that has reduced the wall thickness to less than that required for MAOP, and localized corrosion pitting to a degree where leakage might result.
- UNGSF, general corrosion that has reduced the wall thickness of any metal component to less than that required for the well's MOP, or localized corrosion pitting to a degree where leakage might result.

Unintended movement or abnormal loading by environmental causes, such as an earthquake, landslide, or flood, that impairs the serviceability of a pipeline or the structural integrity or reliability of a UNGSF or LNG facility that contains, controls, or processes gas or LNG.

Any crack or other material defect that impairs the structural integrity or reliability of a UNGSF or an LNG facility that contains, controls, or processes gas or LNG.

• Any material defect that impairs the serviceability of a pipeline that operates at 20% or more SMYS, or the serviceability or the structural integrity of a UNGSF.

Reporting 191.23 Reporting safety-related conditions

- Any malfunction or operating error that causes the pressure plus the build-up allowed for operation of pressure limiting or control devices to exceed either the MAOP of a distribution or gathering line, the maximum well allowable operating pressure of an UNGSF, or the MAWP of an LNG facility that contains or processes gas or LNG.
- A leak in a pipeline, UNGSF, or LNG facility containing or processing gas or LNG that constitutes an emergency.
- Inner tank leakage, ineffective insulation, or frost heave that impairs the structural integrity of an LNG storage tank.
- Any safety-related condition that could lead to an imminent hazard, for purposes Other than abandonment, a 20% or more reduction(IMP)in operating pressure or shutdown of operation of a pipeline, UNGSF, or an LNG facility that contains or processes gas or LNG.

Reporting 191.23 Reporting safetyrelated conditions

- Transmission pipelines only, exceedance of the MAOP plus build-up.
- The reporting requirement of the above is not applicable to gathering lines, distribution lines, LNG facilities, or UNGSF.
- Any malfunction or operating error that causes the pressure of a UNGSF using a salt cavern for natural gas storage to fall below its minimum allowable operating pressure, as defined by the facility's *State* or Federal operating permit or certificate, whichever pressure is higher.

Reporting 191.23 Reporting safetyrelated conditions

- A report is **NOT** required for:
- Exists on a master meter system, A reporting-regulated gathering pipeline—TYPE R, a Type C gas gathering pipeline with an outside diameter of 12.75 inches or less
- A Type C gas gathering pipeline covered by the exception in § 192.9(f)(1)
- Is an incident or results in an incident before the deadline for filing the safety-related condition report;
- Exists on a pipeline (other than an UNGSF or an LNG facility) that is more than 220 yards (200 meters) from any BIHO or outdoor place of assembly,

Except reports are required for conditions within the ROW of an active railroad, paved road, street, or highway; or......

Reporting 191.23 Reporting safetyrelated conditions

- Is corrected by repair or replacement before the deadline for filing the SRC
- A report must be filed for:
- General Corrosion in a pipeline above 20% SMYS unless it is localized corrosion pitting on an effectively coated and cathodically protected pipeline; and
- Any exceedance of MAOP OR Exists on an UNGSF, where a well or wellhead is isolated, allowing the reservoir or cavern and all other components of the facility to continue to operate normally and without pressure restriction.

Reporting 191.25 Filing safetyrelated conditions

- Each report of a safety-related condition must be filed in writing within 5 working days (not including Saturday, Sunday, or Federal holidays) after the day a representative of an operator first determines that the condition exists, but not later than 10 working days after the day a representative of an operator discovers the condition. Separate conditions may be described in a single report if they are closely related. Reporting methods and report requirements are described in paragraph (c) of this section.
- (b) Each report of a MAOP exceedance meeting the requirements of criteria in § 191.23(a)(10) for a gas transmission pipeline must be filed (received by the Associate Administrator) in writing within 5 calendar days of the exceedance

Reports must be filed by email to *InformationResourcesManager@dot.gov* or by facsimile to (202)366-7128. The report must be headed "Safety-Related Condition Report."

MAOP Exceedance, the report must be headed "Maximum Allowable Operating Pressure Exceedances."

All reports must provide the following information:

Name, principal address, and operator identification number (OPID) of the operator.

Date of report

Name, job title, and business telephone number of person submitting the report

Name, job title, and business telephone number of person who determined that the condition exists.

Date condition was discovered and date condition was first determined to exist

Location of condition, with reference to the State (and town, city, or county) or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, or name of pipeline.

Description of the condition, including circumstances leading to its discovery, any significant effects of the condition on safety, and the name of the commodity transported or stored.

The corrective action taken (including reduction of pressure or shutdown) before the report is submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action.

Reporting 191.29 NPMS

- Each operator of a gas transmission pipeline or liquefied natural gas facility must provide the following geospatial data to PHMSA for that pipeline or facility:
- The information required in paragraph (a) of this section must be submitted each year, on or before March 15, representing assets as of December 31 of the previous year. If no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at www.npms.phmsa.
- Mileage of NPMS piping and annual report piping must be within 5%
- if not you will be notified--

Hazardous Liquid Reporting



Reporting Part 195.48

Prescribes requirements for periodic reporting and for reporting of accidents and safety-related conditions.

An operator of a Category 3 rural low-stress pipeline meeting the criteria in § 195.12 is not required to complete those parts of the hazardous liquid annual report form PHMSA F 7000-1.1 associated with IM or high consequence areas.

Reporting 195.49 Annual Reporting

An operator must submit the annual report by June 15 each year for each type of hazardous liquid pipeline facility operated at the end of the previous year.

Alabama Reporting Requirements 770-X-7-.07 Annual Reporting

Reporting 195.50 Accidents

A report is required where there is a release of the hazardous liquid or CO2 transported resulting in any of the following:

- (a) Explosion or fire not intentionally set by the operator.
- (b) Release of 5 gallons (19 liters) or more of hazardous liquid or CO2, except that no report is required for a release of less than 5 barrels (0.8 cubic meters) resulting from a pipeline maintenance activity if the release is:
- Not otherwise reportable under this section; Not one described in § 195.52(a)(4); Confined to company property or pipeline right-of-way; and Cleaned up promptly;
- (c) Death of any person;
- (d) Personal injury necessitating hospitalization;
- (e) Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000.
- Alabama Reporting Requirements
 770-X-7-.09 Telephonic Reporting of Accidents/ Incidents within 1 hour
- Alabama Reporting Requirements
 770-X-7-.10 Accident/Incident Reporting within 30 days

Reporting 195.52 Immediate Notification

- ASAP following discovery, release of the hazardous liquid or carbon dioxide transported resulting in an event described in § 195.50, but no later than one hour after confirmed discovery that resulted,
- Death or requiring hospitalization;
- Resulted in either a fire or explosion not intentionally set by the operator;
- Caused estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000;
- Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards.....
- In the judgment of the operator was significant even though it did not meet the criteria of any other paragraph of this section.

Reporting 195.52 Immediate Notification

- Information required. Each notice required by paragraph (a) of this section must be made to the NRC by telephone to 800-424-8802 (in Washington, DC, 202-267-2675) or electronically at http://www.nrc.uscg.mil and must include the following information:
- Name, address and OPID
- Name and telephone number of the reporter.
- The location of the failure.
- The time of the failure.
- Fatalities and personal injuries, if any.
- Initial estimate of amount of product released.
- All other significant facts known by the operator that are relevant to the cause of the failure or extent of the damages.

Reporting 195.52 Immediate Notification

- (c) Calculation—Operator's must have a written procedure to calculate and provide a reasonable initial estimate of the amount of released product.
- (d) New information. Within 48 hours after the confirmed discovery of an accident, to the extent practicable, an operator must revise or confirm its initial telephonic notice to NRC—National Response Center

Reporting 195.54 Accident reports

- Written report due: ASAP, but not later than 30 days after discovery of the accident, DOT Form 7000-1.
- (b) Supplemental if operator receives additional info—Due within
- 30 days.
- File thru portal and mark initial, final, etc

Safety Related Conditions 195.55

General corrosion that has reduced the wall thickness to less than that required for the MOP and localized corrosion pitting to a degree where leakage might result.

- Unintended movement or abnormal loading of a pipeline: earthquake, landslide, or flood, that impairs its serviceability
- Material defect or physical damage impairing the serviceability of a pipeline.
- Any malfunction or operating error causing the pressure of a pipeline to rise above 110 percent of its MOP.
- A leak in a pipeline that constitutes an emergency.
- Any safety-related condition that could lead to an imminent hazard and causes (either directly or indirectly by remedial action of the operator), for purposes other than abandonment, a 20% or more reduction (IMP) in operating pressure or shutdown of operation of a pipeline.

Safety Related Conditions 195.55

- A report is not required for any safety-related condition that-
- Exists on a pipeline that is more than 220 yards (200 meters) from a BIHO or outdoor place of assembly, except that reports are required for conditions within the ROW of an active railroad, paved road, street, or highway, or that occur offshore or at onshore locations where a loss of hazardous liquid could reasonably be expected to pollute any stream, river, lake, reservoir, or other body of water;
- Is an accident
- Or is corrected by repair or replacement in accordance with applicable safety standards before the deadline for filing the safety-related condition report, except that reports are required for general corrosion that has reduced the wall thickness to less than that required for the maximum operating pressure, and localized corrosion pitting on an effectively coated and cathodically protected pipeline.

Filing Safety Related Conditions reports 195.56

- Must be filed (received by OPS) within five working days (not including Saturday, Sunday, or Federal Holidays) after the day a representative of the operator first determines that the condition exists, but not later than 10 working days after the day a representative of the operator discovers the condition.
- Reports may be emailed to: <u>InformationResourcesManager@dot.gov</u>
- by facsimile at (202) 366-7128

Filing Safety Related Conditions reports 195.56

- The report must be headed "Safety-Related Condition Report" and provide the following information:
- (1) Name and principal address of operator
- (2) Date of report.
- (3) Name, job title, and business telephone number of *person* submitting the report.
- (4) Name, job title, and business telephone number of person who determined that the condition exists.
- (5) Date condition was discovered and date condition was first determined to exist.
- (6) Location of condition, with reference to the State (and town, city, or county) or offshore site, and as appropriate nearest street address, offshore platform, survey station number, milepost, landmark, or name of pipeline.
- (7) Description of the condition, including circumstances leading to its discovery, any significant effects of the condition on safety, and the name of the commodity transported or stored.
- (8) The corrective action taken (including reduction of pressure or shutdown) before the report is submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action.

Reporting requirements 195.58

- Prefers Email to https://portal.phmsa.dot.gov
- Alternative Reporting method: If electronic reporting imposes an undue burden and hardship, the operator may submit a written request for an alternative reporting method:
- Information Resources Manager,
- Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, PHP-20, 1200 New Jersey Avenue, SE.,
- Washington DC 20590.
- The request must describe the undue burden and hardship. PHMSA will review the request and may authorize, in writing, an alternative reporting method.
- National Pipeline Mapping System (NPMS). An operator must provide NPMS data to the address identified in the NPMS Operator Standards Manual available at www.npms.phmsa.dot.gov or by contacting the PHMSA Geographic Information Systems Manager at (202) 366-4595.—updates on liquid due June 15 of each year
- Alabama Reporting Requirements
 770-X-7-.08 Safety Related Condition Reports

Alabama Reporting Requirements 77-X-7-.06 Reporting of Construction Work

 All construction work involving the addition and/or replacement of gas or hazardous liquids pipelines or mains greater than 1000 feet in length shall be reported to the Alabama Public Service Commission before construction begins.