

Enforcement Issues and Observations in New England

2016 NEPSR

Pipeline Safety Seminar

Gary Kenny



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Top Three Enforcement Issues

- Failure to Follow Procedures
- Operator Qualification Issues
- LPG Systems – NFPA 58 Violations



Failure to Follow Procedures

- Plastic Pipe Joining Issues
 - Oversights or shortcuts?
 - Often hand-in-hand with OQ issues
 - Do personnel have the necessary qualification record, but lack adequate training?



Failure to Follow Procedures

(Continued)

■ Routine O&M Matters

- Failure to conduct at required interval
- Failure to follow steps in a procedure
 - Oversights or intentional shortcuts?
- Are personnel adequately trained?



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Operator Qualification Issues

- Inadvertent lapses of qualifications
- Failure to follow the procedures for a task for which an individual has the OQ documentation
 - Do personnel have the necessary qualification records, but lack adequate training?
 - Oversights or intentional shortcuts?



Operator Qualification Issues

(Continued)

- New Technology
 - Do proper OQ Tasks exist?
 - What supplemental/specialty training is required?



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NFPA 58 Violations

- With very few exceptions, all violations found on jurisdictional LPG systems pertain to NFPA 58
 - What does this mean?
 - The systems wouldn't be compliant, even if they were not jurisdictional.



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What Can Be Done to Reduce Procedural and OQ Violations?

- Effective QA/QC Programs (as req'd by Maine's Rule)
- Improved Training
- Robust Inspection Program w/Accountability
- Communication from Designers/Engineers on down to Supervisors, Inspectors, & Installers/Technicians
- Other Suggestions?



Distribution and Transmission Integrity Management Programs

Threat Assessment Beyond the Basic



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Integrity Management

Threat Identification

- Threats to system segments are often identified through investigation of leaks, damages, and other issues.
- There are other places to look for help with threat identifications



Integrity Management

§192.1007(b) – *Basic Threat Categories*

- Corrosion
- Natural Forces
- Excavation Damage
- Other Outside Force Damage
- Material or Weld Failure
- Equipment Failure
- Incorrect Operations
- Other Threats



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Other Threat Identification Resources

- Extensive question set located in GPTC Guide for Gas Transmission and Distribution Piping System (ANSI GPTC Z380.1) Guide Materials Appendix G-192-8
- Company Records / Resources
 - Corrosion
 - Patrols and Inspections
 - SME Interviews and Questionnaires
 - Issues Identified in Enforcement Cases with Other Operators



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Other Threat Identification

Resources

■ PHMSA Advisory Bulletins

- Example: ADB-11-02 (Snow and Ice Damage)

All operators should review their systems

- Example: ADB-07-01 (Brittle Cracking Older Plastic)

Only operators with applicable material need review

■ PHMSA FAQ

- Emphasis on potential danger from cross-bores



Integrity Management

Other Threat Identification

Resources

- Industry/Agency Committee Reports and White Papers
 - American Gas Association
 - Interstate Natural Gas Association of America
 - Gas Piping Technology Committee
 - National Transportation Safety Board
 - National Association of Corrosion Engineers
 - Etc.



Integrity Management

Other Threat Identification

Resources

- PHMSA Enforcement Guidance Mentions:
 - Future Infrastructure Projects
 - Discovery of material not previously known to be in system
 - Overpressurization events
 - Right-of-Way infringements
 - Near misses / pipeline damage without release
 - Pipe materials subject to brittle failure modes



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Integrity Management *Threat Assessment*

- Any threats which are ruled out must be documented



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Thank You!



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