Enforcement Issues and Observations in New England

2016 NEPSR
Pipeline Safety Seminar
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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?



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?



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.



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



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







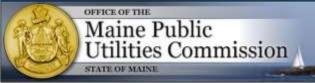
Integrity Management §192.1007(b) – Basic Threat Categories

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



Integrity Management 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









Integrity Management 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 crossbores







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





Integrity Management Threat Assessment

 Any threats which are ruled out must be documented



Thank You!

