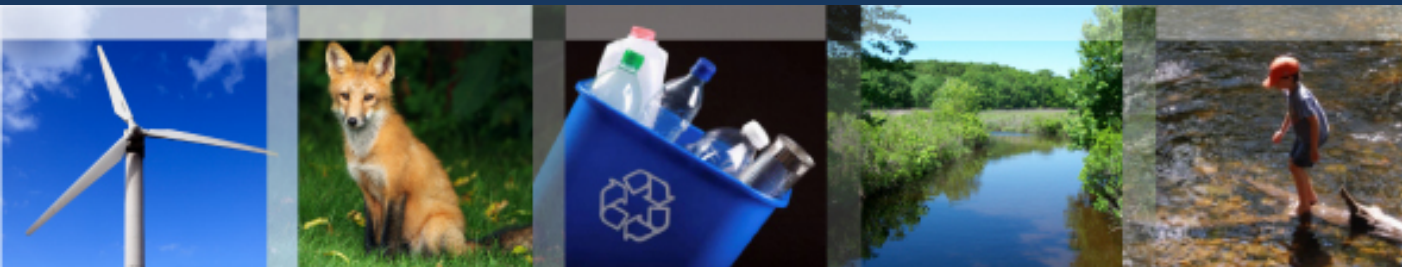




# Connecticut Department of Energy and Environmental Protection



# State Presentation - Connecticut

October 10, 2018

Karl Baker

2018 Pipeline Safety Seminar

Meredith, NH



Connecticut Department of Energy and Environmental Protection

# Personnel

- Program Manager – Karl Baker – 25 years
- Engineer 3 – Bruce Benson – 21 years
- Engineer 3 – Daniel Nivison – 20 years
- Engineer 2 – John DePaolo – 8 years
- Engineer 2 – Kevin Dowling – 5 years
- Engineer 1 – Daniel Tomasino – 5 years
- Engineer Intern – Sean Morris – 6 months



# Cast Iron & Unprotected Steel

Start of Year	Cast Iron Main	Unprotected Bare or Coated Steel Main	Leak Prone Steel Services
	Miles	Miles	Quantity
2013	1426	221	71016
2014	1381	218	67621
2015	1349	205	65146
2016	1298	196	62077
2017	1251	188	57631
Mains – 18% leak prone		Services – 13% leak prone	



# Accelerated Infrastructure Replacement

- 20-year or less time frame
- DIMP trackers



# Enforcement Issues

## Recent Top Enforcement Issues

1. 192.11 – propane facility issues – NFPA 58 violations
2. 192.605(a)/13(c) – not following procedures or bad/no procedures
3. 192.JOINING – 283, 285, 287



# Civil Penalties

<b>Year</b>	<b>Number Assessed</b>	<b>Dollars Assessed</b>	<b>Number Collected</b>	<b>Dollars Collected</b>
2013	10	\$292,000	11	\$309,479
2014	3	\$31,500	2	\$19,021
2015	16	\$447,250	16	\$462,250
2016	38	\$294,375	26	\$180,025
2017	45	\$370,200	53	\$492,600



# Recent Civil Penalties

- \$60,000 – lack of PPE and lack of inspection





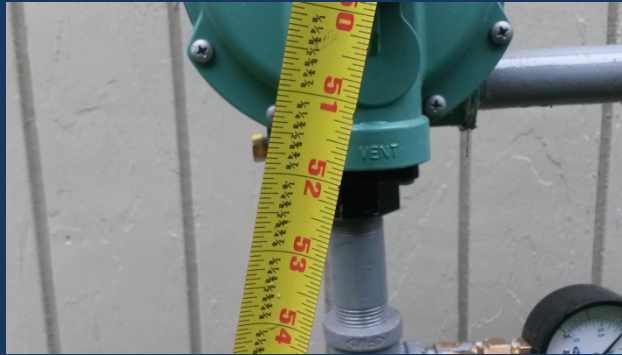
# Recent Civil Penalties

- \$50,000 – connected air compressor to live main



# Recent Civil Penalties

– \$7,000, \$14,000, \$14,000, \$30,000 and \$50,000 –  
propane field installation violations



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# Recent Civil Penalties

- \$50,000 – pipe joining AOCs



# Recent Civil Penalties

- \$75,000 – not qualified to join nor to perform PT





# Recent Civil Penalties

– \$50,000 - clearance



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# Recent Civil Penalties

- \$25,000 – corrosion technician not OQ'ed



# Recent Civil Penalties

- \$50,000 – not qualified to join with inspector watching



# Recent Civil Penalties

- \$10,000 – failure to day-light crossings while using trenchless technology





# Recent Civil Penalties

- \$75,000 – failure to install split sleeves at sheer points



# Recent Civil Penalties



## MDPE Tees on HDPE Mains

- Problem started in 2004
- Company found problem in 2011
- Operator lied (more than once) to PURA during 2017 O&M Audit
- Senior Director of Gas Operations and O&M Manager terminated
- Excavated 616 tees
- Replaced 124 tees



# Recent Civil Penalties

## MDPE Tees on HDPE Mains

- 113 counts of 49 CFR 192.603(b) in that the Operator failed to keep accurate MAOP records
- 113 counts of 49 CFR 192.619(a)(1) and 192.621(a)(1) in that the operating pressure exceeded the MDPE tee design pressure
- 113 counts of 49 CFR 192.703(b) for failing to replace, repair or remove from service each segment of pipeline that becomes unsafe



# Recent Civil Penalties

## MDPE Tees on HDPE Mains

- 120 counts of 49 CFR 192.739(a)(3) in that the overpressure control set-points at gate/DR stations were not set properly
- 113 counts of 49 CFR 192.805(b) in that a deficient OQ program did not ensure that individuals were qualified to recognize and react to AOCs, specifically the installation of fittings not rated for the operating pressures



# Recent Civil Penalties

## MDPE Tees on HDPE Mains

- 113 counts of 49 CFR 192.805(h) in that the OQ program did not provide adequate training
- 113 counts of Conn. Agencies Regs. §16-11-42(a) in that the Operator failed to use every effort to properly protect the public from danger and exercise due care to reduce the hazards to which employees, customers and others were subjected



# Recent Civil Penalties

## MDPE Tees on HDPE Mains

- Total cost to shareholders >\$4.7 million
  - Civil Penalty of \$1.5 million
    - Up to \$600,000 can be used for GIS
    - Up to \$150,000 can be used for pilot program
  - Not allowed to retain any recovered money
    - If any recovery, must be returned to ratepayers
  - Not allowed to recover any costs ≈\$3 million
    - Includes, but not limited to: outside counsel, outside investigation, remediation, GIS or pilot program
  - PURA directed Management Audit ≈\$200,000



# One-Call

Year	Total Locate Requests	Total Damages per 1,000 Locates	Total Gas Damages per 1,000 Locates	Total Gas Damages due to Utility Error per 1,000 Locates	Total Fines Collected
2012	173,000	3.03	1.6	0.6	\$156,000
2013	182,177	3.11	1.6	0.4	\$117,000
2014	189,366	2.86	1.5	0.4	\$110,350
2015	201,945	2.89	1.4	0.4	\$134,100
2016	206,131	2.60	1.4	0.4	\$135,300
2017	215,630	2.17	1.5	0.5	\$299,500



# Propane

- Jurisdictional propane operators – 24
- Jurisdictional systems -  $\approx 350$
- We have inspected every known operator
  - Please let us know if someone is out there that we do not know about
- We are not going to be your code compliance department!





# Propane

- 12/4/2017 – PHMSA interpretation sent to AmeriGas, clearly states that under 49 CFR 192.625(f), LP operators must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable
- However, neither the interpretation nor 192.625 states where the sampling is performed



# Propane

- 1/12/18 - CT PURA asks if the sampling can take place at the bulk plants
- 9/24/18 – PHMSA interpretation sent to CT PURA says NO. Sampling must be performed in the pipeline system to ensure the entire pipeline system has the required odorant levels



# Incidents

NONE!



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Coming up...

# Legislative Proposal



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# Questions?

Karl Baker

Public Utilities Supervisor of Technical Analysis

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