

PIPELINE SAFETY UPDATE

PHMSA AMENDMENT NO. 195-102 WAS ISSUED OCTOBER 1, 2019
THIS RULEMAKING WENT INTO EFFECT JULY 1, 2020.

There are many factors that should be considered when discussing risks to pipeline safety. These include manufacturing issues, external weather and environmental factors, land-use activities near pipelines, other operational issues such as leak detection and age-related integrity issues.

The recent rulemaking addresses many of these risk factors by making changes in several key areas:



ADMINISTRATIVE
& REPORTING

O & M

LEAK
DETECTION

INTEGRITY
MANAGEMENT

ADMINISTRATIVE & REPORTING

Scope and Definitions

- In order to collect data, extend reporting requirements to certain hazardous liquid gravity and rural gathering lines not currently regulated by PHMSA. §195.1
- The definition of “hazardous liquid” has been modified to include biofuels. §195.2

Hazardous Liquids Reporting

- Pipelines transporting hazardous liquids by gravity will be subjected to the same annual, accident and safety related conditions reporting requirements as other hazardous liquid pipelines. §195.13
- Otherwise unregulated rural gathering lines and certain offshore pipelines in State waters are subject to the annual, accident and safety related conditions reporting requirements as other hazardous liquid pipelines. §195.15

Safety Data Sheets

- Operators of hazardous liquid pipeline facilities, following an accident that results in a spill are to provide safety data sheets to the designated Federal on Scene Coordinator and appropriate State and local emergency responders within 6 hours of notification to NRC. §195.65

O & M

Passage of Internal Inspection Devices

- The provisions in the regulations that allow an operator to petition the Administrator for a finding that the ILI compatibility requirement does not apply as a result of construction related constraints and problems has been repealed. The other provisions are reorganized without altering the existing substantive requirements. §195.120

Repair Requirements

- The repair requirements are modified to include a new paragraph to clearly require operators to consider risk when prioritizing remediation of any abnormal condition that could adversely affect the safe operation of a pipeline system regardless of whether the conditions are in an HCA or non-HCA. §195.401(b)

Extreme Weather and Natural Disaster Inspections

- Inspections of pipelines in areas affected by extreme weather or natural disasters within 72 hours. This provision affects all covered lines under §195.1, whether they be onshore or offshore, and in a high consequence area (HCA) or outside an HCA as defined in 49 CFR §195.450. §195.414

Integrity Assessments Outside HCAs

- Requires integrity assessments at least once every 10 years, using inline inspection tools or other technology, as appropriate for the threat being assessed, of onshore, piggable, hazardous liquid pipeline segments located outside of HCAs. §195.416

LEAK DETECTION - Does not apply to Offshore or Regulated Rural Gathering

- CPM has been removed from the title to read Leak Detection. All existing or newly constructed covered pipelines are designed to include leak detection. If CPM is used, must be in accordance with the requirements in Section 4.2 of API 1130, and any other applicable design criteria in the standard. §195.134
- Extends the required use of leak detection systems beyond HCAs to all regulated hazardous liquid pipelines, except for offshore gathering and regulated rural gathering pipelines. This is to help mitigate the effects of hazardous liquid pipeline failures that occur outside of HCAs. Includes certain factors in determining what kind of system is necessary to protect public, property, and the environment. §195.444



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developed section



INTEGRITY MANAGEMENT IN HCA'S

Programs and Reporting

- Deadlines for the development of a written IM program prior to the pipeline going into operation has been clarified. §195.452 (b)(1)
- Amendments made to clarify the baseline assessment requirements for new or converted pipelines as well as newly identified HCA's. Operators should keep the records they have to show compliance regarding the baseline assessments performed. §195.452(d)
- Section is amended to require an operator to notify PHMSA and provide an expected date outside the 180 days when adequate information will be available. §195.452(h)(2)
- Section is amended to establish that at least on an annual basis an operator will verify the risk factors used to identify covered segments that could affect an HCA, not to exceed 15 months. §195.452(j)

Integrity Assessments

- Operators must consider the uncertainty in tool tolerances in reviewing the results of ILI assessments. An operator must use an ILI tool or tools capable of detecting crack anomalies if a pipeline segment has an identified risk or threat related to cracks. §195.452(c)(1)(i)(A)
- All pipelines in or affecting HCAs be capable of accommodating in-line inspection tools within 20 years, unless the basic construction of a pipeline cannot be modified to permit that accommodation. §195.452(n)
- New annual assessment requirements for operators of any underwater hazardous liquid pipeline facility located in an HCA that is not offshore pipeline facility and any portion of which is located at depths greater than 150 feet under the surface of the water. These operators must complete assessment not less often than once every 12 months using ILIs appropriate for the threats. §195.454

Risk Assessment

- Seismicity is added to factors that must be considered regarding assessment schedules per (e), performing information analysis per (g), for implementing preventive and mitigative measures under paragraph (i). §195.452
- Criteria an operator must consider in performing the informational analysis are prescribed per §195.452(g) and include:
 1. Pipe diameter, wall thickness, grade, and seam type
 2. Pipe coating, including girth weld coating
 3. Maximum operating pressure (MOP) and temperature
 4. Endpoints of segments that could affect high consequence areas (HCAs)
 5. Hydrostatic test pressure including any test failures or leaks – if known
 6. Location of casings and if shorted
 7. Any in-service ruptures or leaks – including identified causes
 8. Data gathered through integrity assessments required under this section
 9. Close interval survey (CIS) survey results
 10. Depth of cover survey
 11. Corrosion protection (CP) rectifier reading
 12. CP test point survey readings and locations
 13. AC/DC and foreign structure interference surveys
 14. Pipe coating surveys and cathodic protection survey
 15. Results of examinations of exposed portions of buried pipelines (i.e., pipe and pipe coating condition, see § 195.569)
 16. Stress corrosion cracking (SCC) and other cracking (pipe body or weld) excavations and findings, including in-situ non-destructive examinations and analysis results for failure stress pressures and cyclic fatigue crack growth analysis to estimate the remaining life of the pipeline.
 17. Aerial photography
 18. Location of foreign line crossings
 19. Pipe exposures resulting from repairs and encroachments
 20. Seismicity of the area
 21. Other pertinent information derived from operations and maintenance activities and any additional tests, inspections, surveys, patrols, or monitoring required under this part.

DOWNLOAD THIS ADDITIONAL RESOURCE

[Click here to download the Hazardous Liquid Final Rule Code Changes](#)



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PHMSA AMDT. No. 195-102
RECOMMENDED ACTIVITIES SUMMARY

ADMINISTRATIVE & REPORTING

- Review and update Liquid O&M for applicable regulatory changes; including Annual, SRC and incident reporting.
- Review and update Liquid IMP for applicable regulatory changes.
- Annual reporting for all hazardous liquid pipelines will need to be accounted for and information collected.
- Ensure the safety data sheets for crude and NGLs are current and readily available to provide within 6 hours of reporting to NRC.
- Create and document Management of Change (MOC) for actions taken as a result of this amendment.
- Ensure new compliance deadlines are captured in Compliance Management System (CMS).

GENERAL

- Within 72 hours after a significant weather event or natural disaster inspect pipeline facilities.
- Create training to update stakeholders.
- Update Operations with regulatory and procedural changes.
- Review OQ tasks (contractors and employees) for relevance and technical accuracy, given any procedural changes.
- Review and update all affected forms.
- Adjust workflow and/or processes as necessary dependent on who owns the changes.

LEAK DETECTION

- Newly constructed covered pipelines designed to include leak detection systems beyond HCAs except for offshore gathering and regulated rural gathering pipelines.
 - Review API 1130, Section 4.2 for applicability to existing leak detection systems and consider for any modifications made to enhance leak detection systems.
- Leak detection will need to be reviewed and documented as to what systematic, repeatable methodology is used for every applicable asset.

INTEGRITY MANAGEMENT IN HCA'S

- Confirm data sources can provide the necessary information to make informed decisions (dates of installation, dates of assessments, pipeline facility attributes, mileage, pipe diameter, spatial data, etc.) – QC/QA – and if unknown, how do you ascertain? (Evergreen will provide guidance on this topic in a separate update.)
- Annual informational analysis in order to determine risk factors.
 - Incorporate Overland Spread analysis into plan as new information becomes available
 - Incorporate Geohazards as the new information becomes available
 - Consider HCA analysis annually to ensure no newly identified HCAs
 - Explicit reference to seismicity is added to factors that must be considered
- All pipelines in or that could affect HCAs be capable of accommodating in-line inspection tools within 20 years.
- Require integrity assessments at least once every 10 years outside HCAs.
- Update and/or create IMP assessment deadlines given the timetables where applicable.
- Identify gaps with definitive timelines for closure, given informational analysis and integration of data, knowns and unknowns.
- Assess all applicable pipelines for inclusion into IMP and setting into place deadlines and compliance activities.
- Determine if any underwater hazardous liquid pipelines meet criteria outlined in 195.454 requiring annual ILI assessment. If so, add to Liquid IMP and ILI assessment schedules.