

# Integrity Verification Process Workshop

Sponsored by PHMSA  
Washington, DC  
August 7, 2013

One Public Perspective

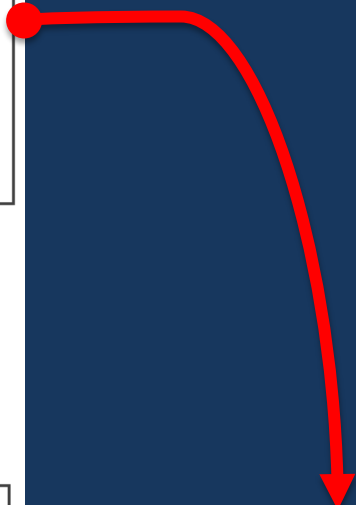
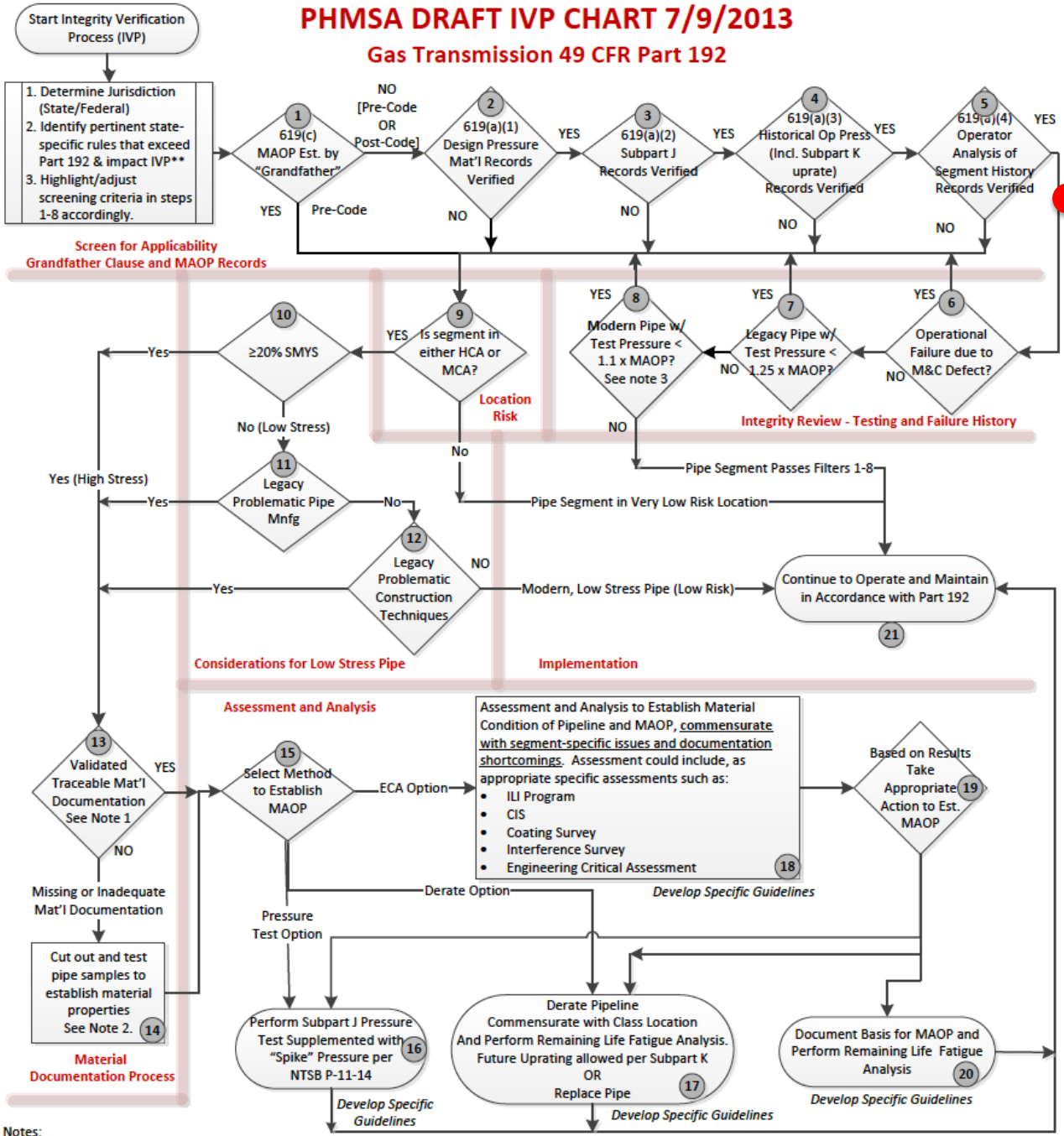
Presented by Carl Weimer, Executive Director

**Pipeline Safety**  
  
T R U S T

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IN THE PUBLIC INTEREST.

# PHMSA DRAFT IVP CHART 7/9/2013

## Gas Transmission 49 CFR Part 192



Notes:

# Data shows risk exists!

- Complete Records not reported for 264,935 miles (86.3% total GT) outside of HCA in Classes 1 and 2 (unclear to us if this was asked for – not part of congressional mandate)
- Records Incomplete for 5,402 miles – 12.0% of remaining miles in Classes 3 and 4 and any other HCA
- Thousands of people live within PIRs in Class 1 and 2 areas outside of HCAs

# Surprised this is needed

The public had assumed that Integrity Management Planning had already dealt with this issue.

How can an operator have a plan to assess the risks to their pipe, if they don't know what pipe they have in the ground?

Why did it take a San Bruno size tragedy to find this fatal flaw in integrity management?

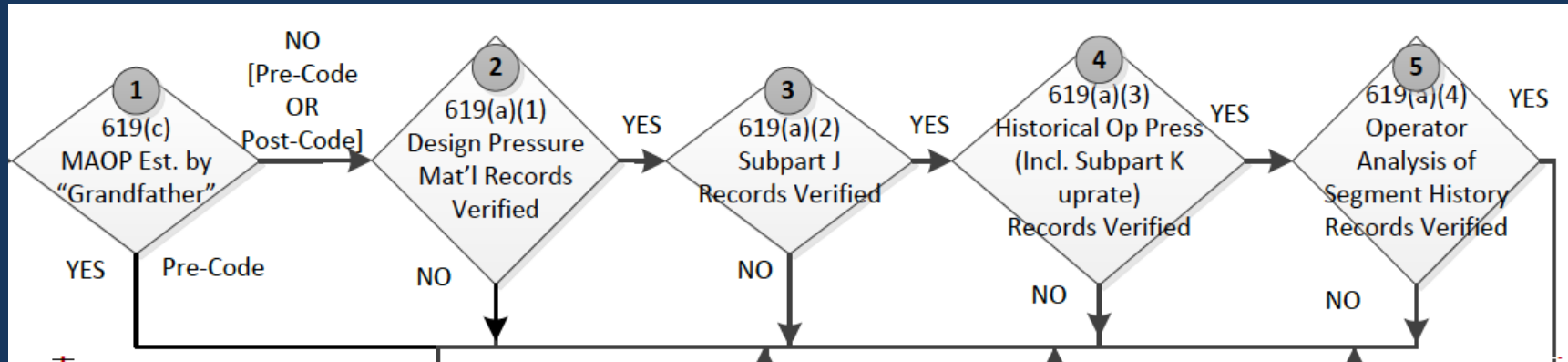
# Why the Delay? This was supposed to be done in July.

“§ 60139. Maximum allowable operating pressure

“(d) TESTING REGULATIONS .—

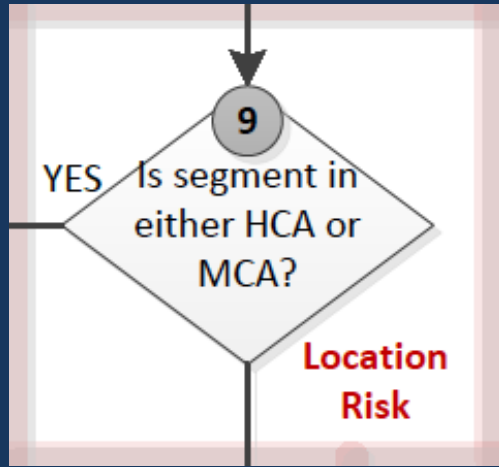
“(1) IN GENERAL .—Not later than 18 months after the date of enactment of this section, the Secretary shall issue regulations for conducting tests to confirm the material strength of previously untested natural gas transmission pipelines located in high-consequence areas and operating at a pressure greater than 30 percent of specified minimum yield strength.

# Decisions for non-grandfathered pipe



We support this part of the PHMSA proposal. It is clear in 192.619 that it is the “lowest” of 192.619 (a) (1) – (4) so if you have no record for even one of those then you don’t know what the lowest MAOP might be

# Creation of a Moderate Consequence Area

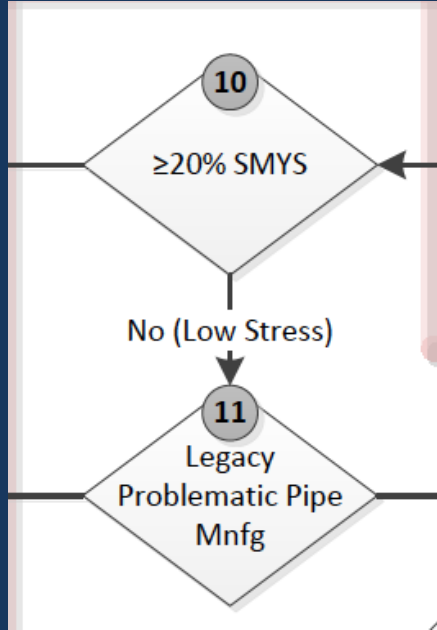


We support the creation of a Moderate Consequence Areas. It will go a long way toward helping the expansion of Integrity Management requirements outside of current HCAs as we and many industry groups have endorsed.

In Class 1 areas we support using 1 house /site in a PIR for inclusion in a MCA

***Moderate Consequence Area (MCA)*** means non-HCA pipe in Class 4, 3, 2, locations & Class 1 locations with [TBD] houses/sites in PIR.

# Concerns with giving low stress pipelines a pass

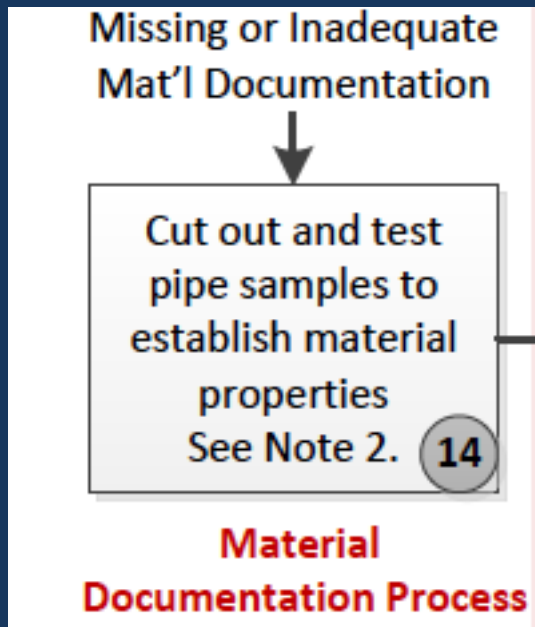


We have some concerns with giving low stress pipelines a pass for two reasons:

- There is evidence that some low stress pipelines do rupture. We suspect most all of these problems will be caught in the Legacy Pipe and Legacy Construction sections, but are not sure of that.
- It is unclear to us how large a problem leaks from these low stress pipelines are. With methane being more potent than carbon dioxide in affecting climate change, the environment along with human safety should be considered.

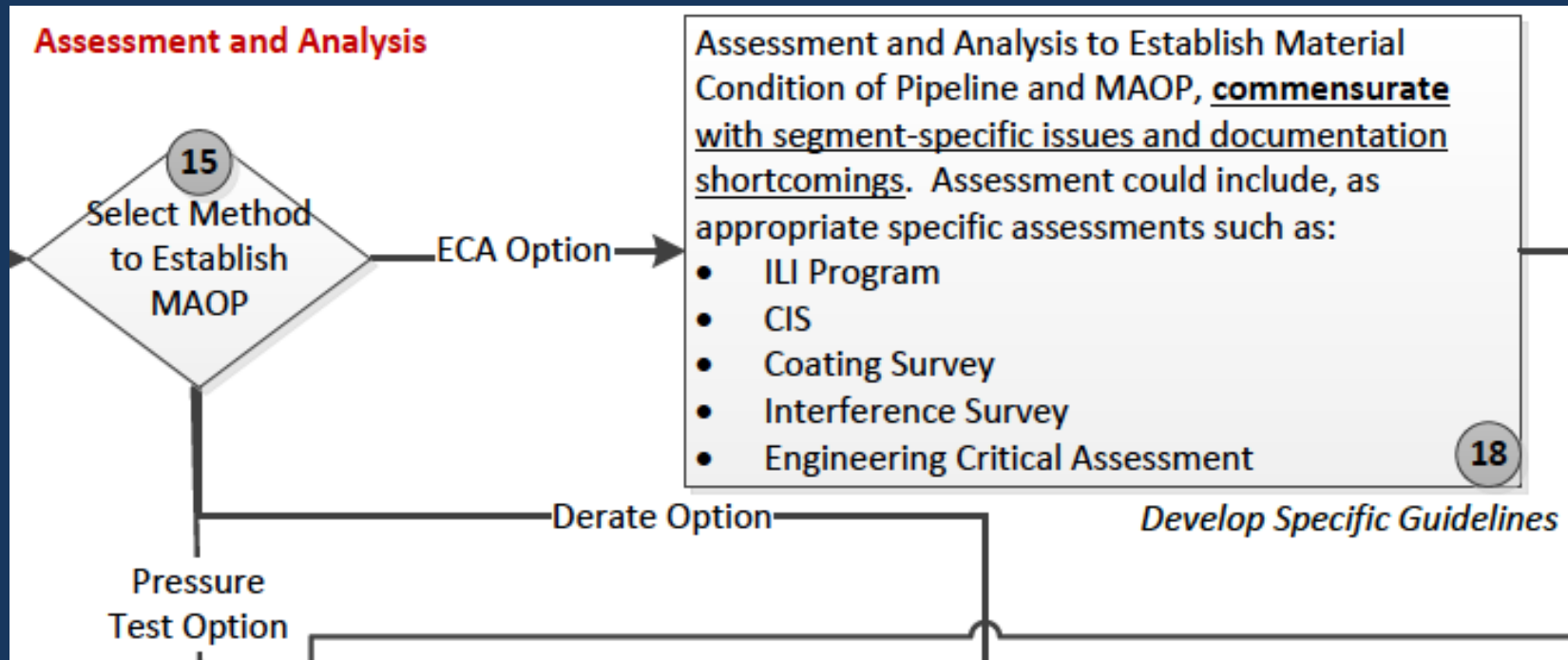


# Material Sampling Protocol



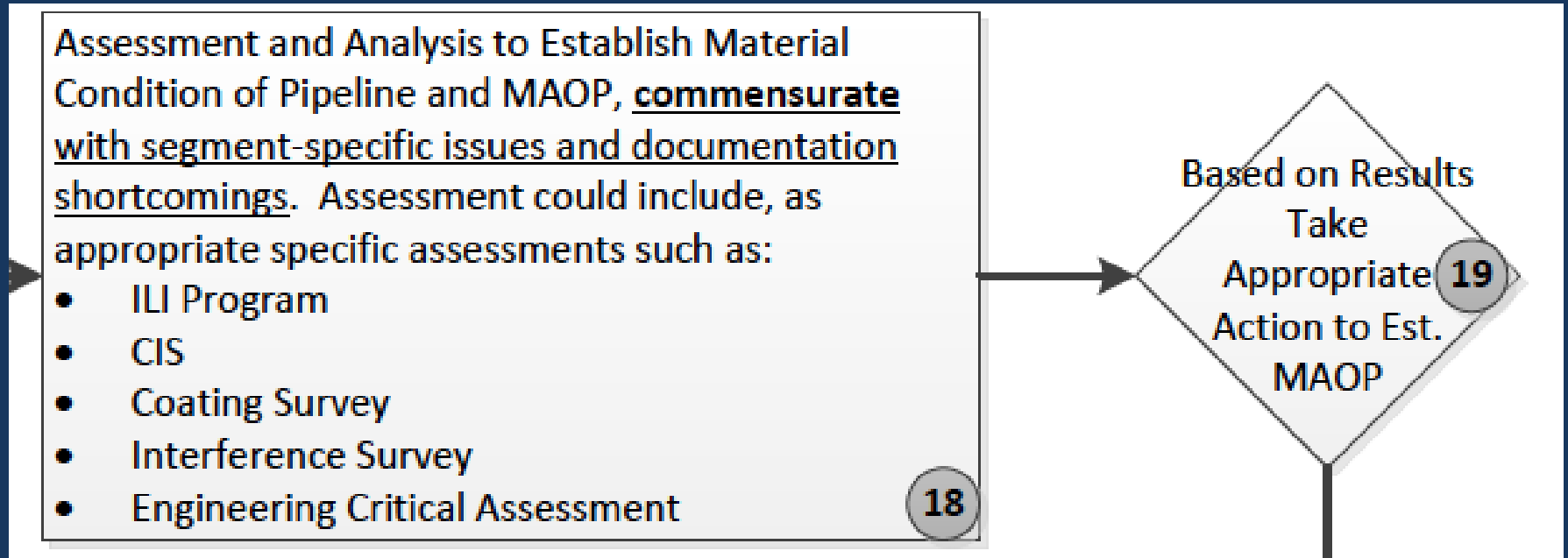
It is not clear to us what the protocol for sampling pipe will be to ensure that there are enough samples taken to ensure that the material properties of all segments are known. This should be spelled out in the final program.

# Unconvinced on ECA Option



Since the specific guidelines have yet to be developed we remain unconvinced that this ECA approach will meet the Congressional mandate of “equal or greater effectiveness” to a pressure test for determining MAOP

# Concerns with too much operator flexibility



The appropriate actions to be taken in Step 19 need to be clearly prescribed

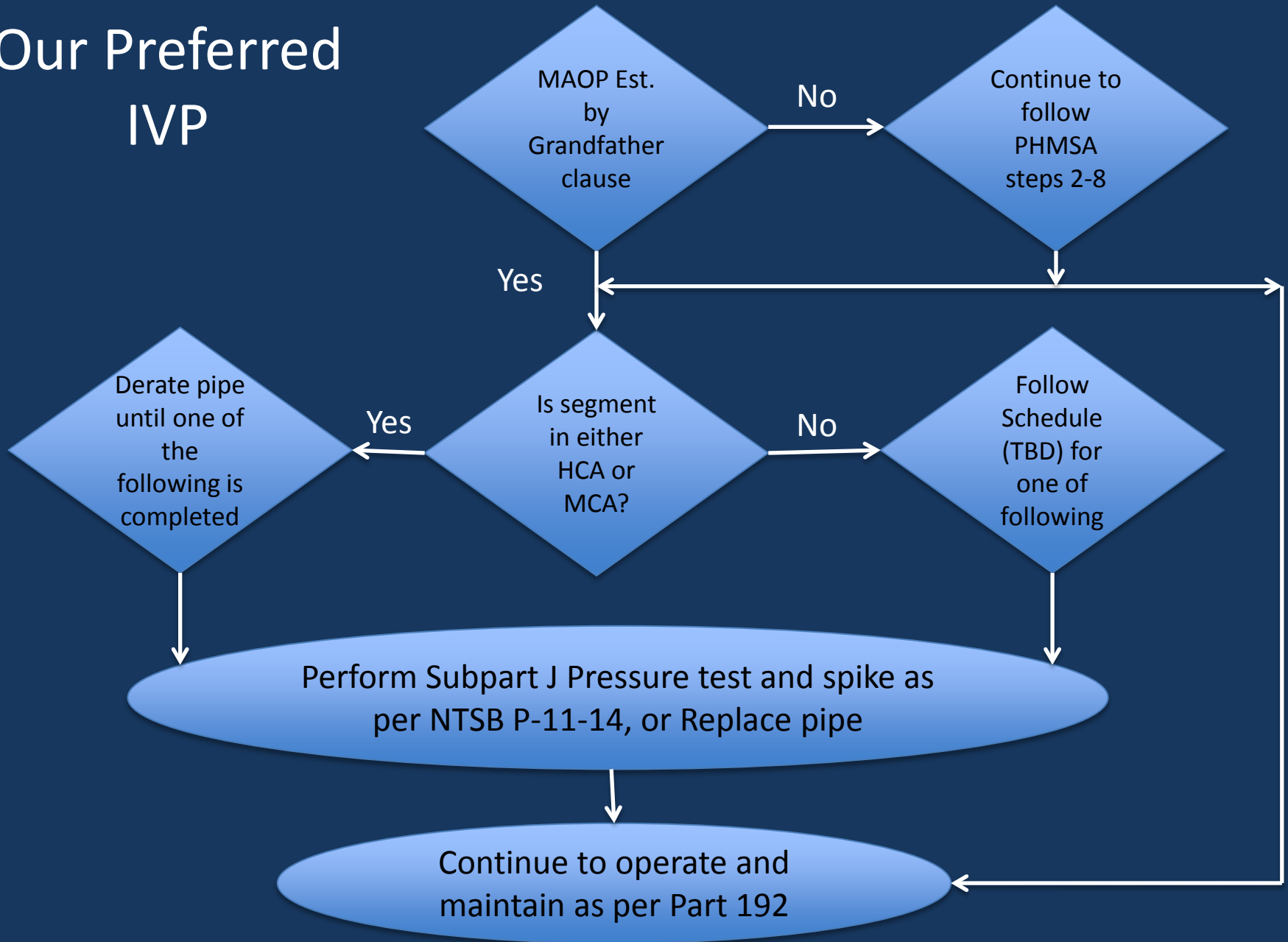
# Still much to do

*Develop Specific  
Guidelines*

TBD



# Our Preferred IVP



# Thank You!

**Pipeline Safety**  
  
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