

# NAPSR Perspective Public Meeting

Valve Considerations for Hazardous Liquid Pipelines:

Rockville, MD  
March 28, 2012



Don Ledversis  
Gas Pipeline Safety  
RIDPUC



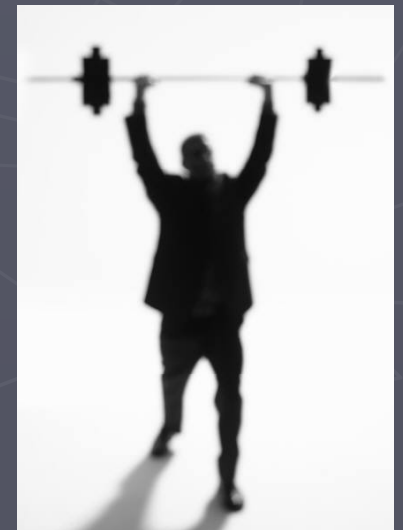
**NAPSR**

*National Association of Pipeline Safety Representatives*

- **An association of 52 State pipeline safety agencies (2 agencies cover liquids only)**
- **Covers all states + DC & PR, except AK and HI**
- **States have over 325 qualified inspectors**
- **Inspecting 78% of 2.3 million miles of pipelines**
- **On average 5,500 miles / inspector**
- **~ 9,000 operators**

# Our Mission Statement:

1. Strengthen state pipeline safety programs



# Our Mission Statement:

2. Promote improved pipeline safety standards



# Our Mission Statement:

3. Promote education, training, and technology



# As PHMSA Partners:

NAPSR has an interest in developing regulations that are fair, clear, unambiguous, and consistent.



# NAPSR States w/Liquids Jurisdiction:

Alabama

Arizona

California

Indiana

Louisiana

Maryland

Minnesota

Mississippi

New Mexico

New York

Oklahoma

Texas

Virginia

Washington State

West Virginia



# NAPSR States w/Liquids Jurisdiction:

34% of 187,000 miles





# NAPSR States w/Liquids Jurisdiction:

Alabama

Arizona

California

Indiana

Louisiana

Maryland

Minnesota

Mississippi

New Mexico

New York

Oklahoma

Texas

Virginia

Washington State

West Virginia



# NAPSR States w/Liquids Jurisdiction:

Alabama

Arizona

California

Indiana

Louisiana

## Where's Rhode

## Island?

Mississippi

Minnesota

New Mexico

New York

Oklahoma

Texas

Virginia

Washington State

West Virginia





**Hazardous Liquids Gasoline Line 3<sup>rd</sup> Party Damage**



**Hazardous Liquids Oil Line 3<sup>rd</sup> Party Damage**

**Hazardous Liquids Oil Line 2<sup>nd</sup> one damaged**



Good News:

No leaks!



**Bad news, 6 years later, 3<sup>rd</sup> Party Damage again...**





# Valve Considerations for Hazardous Liquid Pipelines:

NAPSR, where do we stand....



## Valve Considerations for Hazardous Liquid Pipelines:

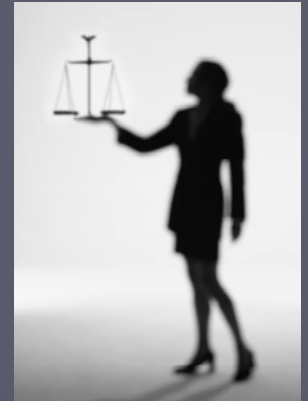
NAPSR submitted comments in February 2011

The logo for regulations.gov features the text "regulations.gov" in a bold, blue, sans-serif font with a white outline. Above the "g" and "o" in ".gov" is a stylized blue wave graphic. To the right of the wave is a small blue star icon.

regulations.gov

Your Voice in Federal Decision-Making

.....our legal statement,



*NAPSR member comments are presented below. Although every effort was made to present a consensus opinion, NAPSR acknowledges that there may be members that do not necessarily Agree with all of the comments presented below. Such members are entitled to and may submit separate comments on behalf of their own state.*

## Valve Considerations for Hazardous Liquid Pipelines:



# Valve Considerations for Hazardous Liquid Pipelines:

## Emergency Flow Restricting Devices - EFRD

C.8/C.9 What industry practices or standards are available for the location and performance requirements of EFRDs and do they set maximum spill volume requirements, EFRD activation timing, or methods for integration of EFRD operation with an operator's SCADA and leak detection systems?

NAPSR REPLY: No, engineering and design should dictate.

# Valve Considerations for Hazardous Liquid Pipelines:

## Emergency Flow Restricting Devices - EFRD

C.10 Should PHMSA specify the criteria where an operator must install an EFRD?

NAPSR REPLY: No, engineering and design should dictate.

# Valve Considerations for Hazardous Liquid Pipelines:

## Emergency Flow Restricting Devices - EFRD

C.11 Should PHMSA mandate the use of EFRDs in all locations?

NAPSR REPLY: No, engineering and design should dictate.

# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.1 What is the average distance between valves that are currently installed according to the requirements in §195.260(c)?

Are these manually operated valves or are these valves controlled remotely?

NAPSR Reply: Proper location is far more important than average placement. Valves need to be installed where they do the most good not on an average distance.

(c) On each mainline at locations along the pipeline system that will minimize damage or pollution from accidental hazardous liquid discharge, as appropriate for the terrain in open country, for offshore areas, or for populated areas.



# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.2 Should PHMSA adopt standards by which operators evaluate valve spacing and valve locations?

NAPSR Reply: This is already being done through integrity management programs.

# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.3 Should PHMSA specify the maximum distance between valves? If so is there an ideal spacing to reduce risks and potential consequences? What projected costs and benefits would result from this specification?

NAPSR Reply: Maximum valve spacing should be based upon consideration of the existing piping and environmental factors just as minimum valve spacing.

# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.4 Should PHMSA prescribe additional requirements for locating valves near HCA's beyond those currently prescribed for EFRDs?

NAPSR Reply: No.

# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.5 Should PHMSA revise the standard in §195.260(e) to include narrower bodies of water? If so, what projected costs and benefits would result from this change?

NAPSR Reply: No.

§195.260(e) On each side of a water crossing that is more than 100 feet (30 meters) wide from high-water mark to high-water mark unless the Administrator finds in a particular case that valves are not justified.

# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.6 Should PHMSA consider a requirement for all valves to be capable of being controlled remotely? If so, what projected costs and benefits would result from this requirement?

NAPSR Reply: Not all valves; however, performance language stating maximum response times for critical valves might help operators to determine where remotely operated valves should be installed.

# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.7 Should PHMSA require installation of EFRDs to protect HCAs? If so, what projected costs and benefits would result from this requirement?

NAPSR Reply: This decision process should already be in the operator's IMP; the present regulations are adequate.

# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.8 If PHMSA proposes to revise the requirements relative to valve location, should the change be applicable to all pipelines or should PHMSA only apply this change to new construction? Could they also apply any time a segment of pipe is repaired or replaced? If such a requirement were to be adopted, under what circumstances should PHMSA consider waiving this requirement? How would limitations to the applicability of this requirement (such as, limitation to new construction) impact the projected costs and benefits resulting from the requirement.

NAPSR Reply: All exemptions, whether for grandfathering a pipeline or other, should be made in consideration of the size of the line, amount of product involved should a failure occur, impact of failure on adjacent infrastructure such as high voltage electric transmission lines, electric generation, gas transmission pipelines, railroads, etc., and the location of the line in proximity to an HCA or USA. The regulations should be based upon the identified threats and risks of failure. Any rupture involving product and any type of water or waterway is not desirable. It does not take much product in a waterway to create major issues. Failure of any sort, whether in on HCA or not. could adversely impact a large population or area.

# Valve Considerations for Hazardous Liquid Pipelines:

## Valve Spacing:

D.9 What are the cost impacts related to changes in the requirements of valve location based on the type of valves installed?

NAPSR Reply: This is not an area of expertise residing within state pipeline safety programs.



The End

