

# **PHMSA's Proposed Hazardous Liquid Rule in a nutshell**

## **1. Extend Certain Reporting Requirements to All Hazardous Liquid Lines**

This includes gravity fed lines as well as about 40,000 miles of gathering lines. Requires them to start submitting annual reports, incident reports, and safety related condition reports.

**Shortfalls:** Does not require GIS mapping info. Does not require any minimum safety standards.

## **2. Require Inspections of Pipelines in Areas Affected by Extreme Weather, Natural Disasters, and Other Similar Events**

This would require an operator to inspect a pipeline segment that was potentially affected by such an event within 72 hours after the event occurs.

**Shortfalls:** Reactive instead of proactive. Does not require operators to do anything different to prevent a pipeline segment from being affected by such events in the first place.

## **3. Require Periodic Assessments of Pipelines That Are Not Already Covered Under the IM Program Requirements**

This would require pipelines outside of HCAs to be assessed mainly by ILI devices once every ten years. Other assessment methods would be allowed if operator demonstrates that the pipe cannot accommodate ILI.

**Shortfalls:** No rationale given for 10 years versus the current 5 years. Only requires the inspection part of the IM Program, not the risk assessment part.

## **4. Modify the IM Repair Criteria and Apply Those Same Criteria to any Pipeline where the Operator has Identified Repair Conditions**

## **5. Expand the Use of Leak Detection Systems for all Hazardous Liquid Pipelines**

This would require all hazardous liquid pipelines transporting liquid in a single phase (without gas in the liquid) to have a system for detecting leaks

**Shortfalls:** Does not require any standard for the performance of any chosen leak detection system

## **6. Increase the Use of Inline Inspection Tools**

This would require all pipelines that could affect an HCA to be able to accommodate ILI devices within 20 years.

**Shortfalls:** Why 20 years?

## **7. Clarify Other Requirements**

- Require operators to develop IM plans before a pipeline is operational.
- Better integrate various risks to each other.
- Annually verify that risk factors have not changed, and if they have do new analysis.
- Make it clear that Integrity Management requirements apply to more than just line pipe.
- Make it clear that seismicity is a risk factor that has to be considered as part of an IM program.