

PHMSA Western Region Update

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U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

To Protect People and the Environment From the Risks of
Hazardous Materials Transportation



Western Region Facts

- Western Region encompasses 12 states
- 26 Inspectors and 3 Contractors
- **12 New Inspectors to be hired (Denver, CA, AK)**
- Regional office Based in Lakewood, CO
- Major Satellite offices in Anchorage, AK and Ontario, CA
- One man field offices in Billings, MT, Cheyenne, WY, and Reno, NV



What We Regulate

Pipeline Miles by System Types – as-of 3/14/2013			
System Type	Miles	% Total	# Operators
Hazardous Liquid	182,563	7%	379
Gas Transmission	304,873	12%	923
Gas Gathering	19,872	1%	320
Gas Distribution (Mains & Services)	2,114,659	80%	1308
Total	2,621,966		Some Operators have multiple System Types
Liquefied Natural Gas	97 Plants	138 Tanks	57 Operators



CATS Western Region Focus

- Public Complaints/Whistleblowers
- Technical Support Re: Pipeline Safety Regulations
- Emergency Response – Information dissemination including incident causes and PHMSA safety actions
- Permits – Foster relationships with other Federal/State/Local agencies and pipeline operators
- Pipeline Safety Education - public and gov't officials
- Operators' Public Awareness Program Effectiveness Evaluations (PAPEE)



Integrity Management (IM)

- IM Program Working:
 - ILI tools advancement in technology (MFL, geometry, crack, seam, stress/strain) continue to identify integrity threats before they can fail
 - Systems being reassessed and compared to previous ILI results thereby finding changes in pipe condition
 - Fewer incidents caused by:
 - Corrosion
 - Outside Force Damage (dents/gouges)



WR Safety Challenges

- Low stress and rural gathering lines applicability – Finding those operators who do not think they are regulated by PHMSA
- AC Interference/Lightning
- Landslide Areas
- Seasonal flash flooding events
- Encroachment of urban areas and parallel utility/pipeline construction
- Aging Infrastructure Being Overly Amortized - Band-aids
- Impact of Shale Oil/Gas: New, Reversed, Converted Pipelines
- **Challenges** to Recruit, Train and Retain Qualified Workforce
- The World is Watching – Bloggers, Internet, Media



Who Regulates Pipelines

- Individual state
- U.S. DOT , PHMSA

In Washington:

- Hazardous Liquid Pipelines
 - WUTC Regulates **Intrastate** pipelines
 - WUTC Regulates **Interstate** pipelines
- Natural Gas Pipelines:
 - WUTC Regulates **Intrastate** pipelines
 - WUTC Regulates **Interstate** pipelines



Jurisdictional Vs. Regulated?

- **Jurisdictional:** Transportation of hazardous liquid by pipeline under Part 192
- **Regulated:** Pipeline facilities and the transportation of gas that are not exempted under Part 192.1(b)
 - Offshore gathering
 - Producing Operator pipeline in the OCS
 - Unregulated onshore gas gathering
 - LPG fewer than 10 customers
 - Etc.
 - Other modes of transportation

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WA UTC Interstate Agent

- WA UTC act as Federal Inspectors on Interstate Pipelines
- Report back to Western Region with findings and results
- Western Region issues enforcement cases
- Western Region verifies corrective actions are implemented with WA UTC assistance.
- **Inspectors are told to trust but verify implementation**



Public Information

- Most information is made public on PHMSA website showing transparency
 - Enforcement letters\Correspondence
 - Operator responses
 - Serious/Significant Incidents
 - General Pipeline location (NPMS)

Public website: www.phmsa.dot.gov



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2015 Inspection Focus

- Integrity Management Implementation:
 - Did you ILI the systems within the time requirements (minimum every 7 years)
 - Did you investigate the anomalies and repair if needed within the time frame allowed
 - Did you investigate the root cause of the anomaly by integrating all data
 - Are you looking for similar “fingerprints” throughout the system that fit
 - Are you showing continuous improvement in your IMP plan.
 - What PM&M have you implemented



2015 Inspection Focus

- Major River crossings:
 - Frequent patrolling
 - Procedures to shut-in line if river flow rates exceed maximum values
 - Increase frequency of depth of cover surveys
- Up to date Class Location Studies
 - Upgrade pipe when needed
 - If you use cluster, consider growth within the sliding mile
 - Playgrounds, campgrounds, public assemblies
- Up to date HCA classification areas:
 - New identified sites



Regulatory Update

This PHMSA website link
<http://www.phmsa.dot.gov/pipeline/regs/rulemaking>
has the status of federal rulemaking

Not much new in 2014-2015



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Standards Update

Final Rule- published 1/5/2015

- Major Topics

- Addresses the set of Incorporated by Reference (IBR) standards throughout PHMSA's part 192, Part 193 and Part 195 code with updated revisions of standards from all standard organization bodies.
- This Rule impacts 22 of the 60+ standards that we currently IBR.
- Per recent statute (Section 24, revised) all IBR standards pertaining to PSR must be available for free to the public. (Most SDOs comply)
- ANSI IBR portal – ibr.ansi.org



Rulemakings in Process

- Safety of On-Shore Hazardous Liquid Pipelines (NPRM stage)
- Excavation Damage Prevention (Final Rule stage)
- Miscellaneous Rulemaking (Final Rule stage)
- EFV Expansion beyond Single Family Residences (NPRM stage)
- Safety of Gas Transmission and Gathering Lines (NPRM stage)
- Operator Qualification, Cost Recovery and Other Pipeline Safety Proposed Changes (NPRM stage)
- Plastic Pipe (NPRM stage)
- Standards Update (Final Rule stage)
- Rupture Detection and Valve Rule (NPRM stage)

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ROW Clearing - Frequently Asked Questions

- Does PHMSA requirements for Patrolling/Surveillance of Pipeline ROW's state the method of patrol?
 - No (waking, biking, driving, aerial, atv, etc.)
- Does PHMSA require an X feet clear cut ROW width for operations & maintenance?
 - No (contracts between landowner and Operator typically govern)
- Does PHMSA require the Operator to remove trees, shrubs, overgrowth along ROW's?
 - No. 10 interpretations on file for §192.705 (Surveillance) §195.412 (Inspection)



PDM Example

- Show live demo of Pipeline Data Mart
- Data we collect and how it is displayed



Recent Lessons Learned

- Use minor events for Public Awareness meetings within the community:
 - Relief valves operate
 - ILI verification digs
 - Odorant complaints
 - Pipe exposures from water scour
 - External force damage



It's Inspection Time

- Don't panic
- Should be prepared every day
 - Records in order
 - Business as usual
- Typically scheduled
- Your time to show off your pipeline safety program
- Ask questions and be cooperative
- Don't be afraid to voice your opinion
- Seems tougher on the inspector than operator

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Inspector's Role

- #1 tool to enforce regulations is phone call and showing up
- Ask plenty of questions – and listen
- Be considerate and cooperate with the operator
 - Meeting time/place
 - Understand operators file keeping process
- Different set of outside eyes on safety
- Should learn something new each inspection
- Inform operator of deficiencies/concerns upon leaving

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PHMSA Inspection Tool

- IA – Inspection Assistant
- A tool for Inspector's to capture results from questions
- A software application installed on a laptop (client/server solution)
- Replaces standard MSWord inspection forms and questions
- Electronically records inspection results in database for historical trending
- Provides considerations/guidance to Inspector to determine compliance to regulations
- Allows the use of mobile devices (Ipad) to capture pictures and location

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No Standard Inspection

- Standard Inspection Forms non-existent
- No “Standard Inspections”
- Inspection Process
 - History of pipeline system (leaks, construction, inspection history, etc.)
 - HCA areas
 - Pigging results
- Common:
 - Field IM Implementation
 - OQ Field Qualification
 - MAOP/MOP verification
 - Corrosion





PHMSA is Hiring!

- PHMSA's FY15 budget appropriated 100+ new positions.
- Typical jobs include **professional, engineering, or scientific occupations** like General Engineers, Accident/ Incident Investigators, and Transportation Specialists; Human Resources Specialists, Budget Analysts, and other **administrative or management-related occupations**; and **technical support**, including GIS Specialists, Data Analysts, and IT Specialists
- Work at our Washington, D.C., headquarters or one of five regional offices across the country
- Sign up for job alerts, view current job openings, and find out how to apply at: www.phmsa.dot.gov/careers
- LinkedIn: [Pipeline-and-Hazardous-Materials-Safety-Administration](#)
- Twitter: [PHMSA_DOT](#)
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