

APPENDIX O

Recent Major Pipeline Safety Programs Affecting Distribution

Of the items below, 1 through 7 are regulatory mandates resulting from the 2002 Pipeline Safety Improvement Act, 8 through 12 are federal regulatory initiatives and 13 through 16 are voluntary industry programs involving joint efforts with government.

1. Direct Assessment standards development
2. Environmental repair permit streamlining
3. One-call 3-digit number rulemaking
4. Right-of-way population encroachment study
5. Operator qualification standard development
6. Public awareness communication effectiveness rulemaking
7. Infrastructure R&D grants program
8. Operator qualification rule revision
9. Public communication standard development
10. Improving crisis communication
11. Evaluating excess flow valve installation
12. Operator safety performance metrics
13. The Plastic Pipe Data Collection Project
14. Ensuring the quality of plastic piping materials
15. Common Ground Alliance
16. Industry consensus standards development

Given below is a brief description of each program.

1. Direct Assessment standards development (with NACE)

This is the DOT's answer to the legislative mandate for a direct assessment standard that is applicable to both transmission and distribution pipelines. The integrity rule references the NACE standard for external corrosion. Soon, the DOT also plans to incorporate into regulation by reference the NACE internal corrosion and stress corrosion cracking standards when these are completed by the NACE-led stakeholder group.

2. Environmental repair permit streamlining (with CEQ et al)

DOT is working with AGA, the Council on Environmental Quality (CEQ) and other stakeholders in developing a mutual understanding with federal permitting agencies to accelerate the permitting of repair work that may be needed in compliance with the transmission integrity rule.

3. One-call 3-digit number rulemaking (FCC)

Aiming at excavation damage prevention, the FCC is about to issue a rule proposal mandating the adoption by the telecommunications companies of a nationwide 3-digit number that a caller can dial to access the closest one-call system. This can make the One-Call system more efficient and improve damage prevention.

4. Right-of-way population encroachment study (with NAS/TRB)

Per 2002 legislative mandate, the DOT has commissioned the National Academy of Sciences Transportation Research Board (TRB) to consider the problem of pipeline right-of-way encroachment. To date this team has considered the feasibility of such a study and a report is due soon.

5. Operator qualification standard development (with ASME B31Q)

In compliance with the 2002 legislative mandate, the DOT is leading development of a national consensus standard (ASME B31Q) for operator qualification programs. The standard will be consistent with the existing operator qualification regulation, but be more comprehensive.

6. Public Awareness communication effectiveness rulemaking

DOT is working with stakeholders from liquids and gas industry to define what would be required to evaluate the effectiveness of operator communication programs. With input from industry, the DOT is separately working with the states to define regulatory requirements that will cover gas utilities.

7. Infrastructure R&D grants program

The DOT Office of Pipeline Safety sponsors a number of research programs aimed at advancing the technology of areas such as pipeline welding, in-line inspection tools, and third party damage prevention/detection. DOT periodically requests input from stakeholders on proposed research programs.

8. Operator qualification rule revision

To comply with NTSB recommendations, the DOT expects to revise the operator qualification rule to include greater specificity. The Technical Pipeline Safety Advisory Committee has voted to approve the revisions.

9. Public communications standard development

DOT urged and supported public, liquids and gas pipeline industry representatives developing a public awareness communications recommended practice to be used by operators to develop their communications programs with various stakeholders. DOT issued a proposed rule to incorporate the standard by reference into DOT pipeline safety regulations.

10. Better Crisis Communication

DOT is working with stakeholders to define guidelines for operators to follow in issuing communications in the event of involvement in a high-profile incident. There is a concern that local parties managing incidents are sometimes not effectively communicating to federal agencies with jurisdiction over the pipeline. A gap analysis of the existing communication system may be performed to identify areas for improvement.

11. Excess flow valve installation

In response to an NTSB recommendation and more recently, public testimony, DOT is reconsidering whether to mandate the installation of excess flow valves on service lines. Operators are already notifying the public about excess flow valves and many are voluntarily installing the valve when it is appropriate. There are concerns about the burden of mandatory installing and unintended consequences.

12. Operator safety performance metrics

DOT continues to look for ways to publicly demonstrate the effectiveness of their safety programs. To this end, the agency is seeking to further improve the gathering of safety performance data from operators. Further changes in operator reports to DOT are being contemplated by federal regulators. Many operators are also participating in various Common Ground Alliance groups involved in third party damage data collection, best practices or education, whose efforts are being closely watched and partly funded by DOT.

13. The Plastic Pipe Data Collection Project

In response to an NTSB recommendation, over 150 gas distribution utilities have been collecting data on the performance of plastic pipe since January 2001, representing over 60% of the installed plastic pipe in the U.S. gas delivery system. Government and industry stakeholders convene periodically to examine the data for areas of concern. The project, which was started in 2001, is at the end of the 3rd year of a 5-year data collection cycle to ensure all portions of the gas distribution system are covered.

14. Ensuring the Quality of Plastic Piping Materials

As part of the process of manufacturing plastic pipe, manufacturers recycle pipe materials that make up the scrap from the manufacturing process. This is known as using regrind materials as part of the mix for new pipe. Because of some instance where contamination of the regrind was suspected, the AGA Plastic Materials Committee proactively undertook discussion of the issue with plastic pipe manufacturers. GTI was retained by the manufacturers and some utilities for a research effort that would help add to existing standards minimum standards for piping manufactured with regrind material, thus helping the utilities carry forward what amounts to a voluntary plastic pipe improved quality control effort.

15. Common Ground Alliance

Excavation damage continues to be the cause of the most incidents involving gas piping systems. Many gas distribution operators continue their participation in the DOT-sponsored Common Ground Alliance (CGA) to promote infrastructure damage prevention. They help develop best practices, prepare educational materials. The CGA has a total 130 corporate members, with over 1,100 individual members. The Alliance is also starting to collect underground damage data from operators of underground facilities on a voluntary basis to help better identify areas in need of improvement.

16. Industry Consensus Standards Development

Besides the legislation-driven standards such as the operator qualification standard and the direct assessment standard being currently proposed by OPS and described under items 1 and 5, above, voluntary consensus standards have been recently developed, such as ASME B31.8S, and the updated Gas Piping Technology Committee (GPTC) Guide, API Recommended Practice RP 1162 (see item 9 above). The National Association of Corrosion Engineers (NACE) is developing added standards. With their broad membership, American National Standards Institute (ANSI)-approved standards bodies such as ASME, NACE, the American Society of Testing Materials (ASTM) and the GPTC are available to take on added gas industry standards development if the need arises. These may contribute to improved and systematic approaches that apply to some specific aspect of distribution integrity.