BEFORE THE

UNITED STATES DEPARTMENT OF TRANSPORTATION

Pipeline and Hazardous Materials Safety Administration

WASHINGTON, D.C.

Pipeline Safety: Class Location Requirements	)	Docket ID No. PHMSA–2013–0161

Comments of the American Public Gas Association

The American Public Gas Association ("APGA") is the national, non-profit association of publicly-owned natural gas distribution systems. APGA was formed in 1961 as a non-profit, non-partisan organization, and currently has approximately 700 members in 36 states. Overall, there are nearly 1,000 municipally-owned systems in the U.S. serving more than five million customers. Publicly-owned gas systems are not-for-profit retail distribution entities that are owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities. All of APGA members are under the jurisdiction of federal pipeline safety regulations. While most do not have transmission pipelines, the class location concept also affects distribution pipelines, so all APGA members are interested in this rulemaking.

General Comments

Most municipal gas systems have no transmission pipe, however according to the transmission annual report database on the Pipeline and Hazardous Materials Safety Administration's (PHMSA) website there are 67 municipal gas systems that together operate about 2,800 miles of pipe classified as transmission.

Transmission pipe owned by municipal gas utilities is very different from interstate transmission pipe – it is typically smaller diameter and lower pressure. The PHMSA data shows that approximately half the municipally-owned transmission piping is between 4 and 10 inches diameter and another 500 miles is 4 inches or less in diameter. 40 miles of municipally-owned transmission pipe is plastic.

In addition APGA points out that the definition of "transmission line" is not risk-based. It includes two functional components as well as one based on operating stress level. According to federal pipeline safety regulations at 49 CFR 192.3, "Transmission Line" means a pipeline, other than a gathering line, that:

(a) Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not downstream from a distribution center; or storage facility;
(b) Operates at a hoop stress of 20 percent or more of SMYS; or
(c) Transports gas within a storage field.

It is important to note that (a) and (c) of this definition are functional rather than risk-related. As noted above, much of the transmission piping operated by municipal gas utilities is relatively low pressure and small diameter compared to interstate transmission pipelines. Some public gas system transmission lines are plastic. If PHMSA elects to proceed to rulemaking with any of the topics discussed in this ANPRM PHMSA should limit applicability to only pipelines classified as transmission due to stress level, and further limit requirements to pipelines operating over 30 % of SMYS.

Pipeline safety regulations have changed significantly since 1970. The definitions of "transmission and "distribution" have not kept pace. APGA encourages PHMSA to consider revising the definition of transmission to be solely risk-based, or creating a new category of pipe for smaller diameter, lower stress lines operated as part of distribution systems. During the Phase 1 discussions of Distribution Integrity Management Programs (DIMP) rules, the working group recommended that PHMSA consider requiring distribution operators to include their "transmission pipelines in DIMP rather than the Transmission Integrity Management rules. This would be an opportune time to make that change.

Specific Comments

PHMSA has asked a large number of questions on a wide range of issues. Because APGA's members do not operate the type of transmission pipelines that many of these questions appear to address, APGA' can only answer some of the questions. We anticipate that other operators and trade associations representing the long line pipelines will provide answers to those questions APGA cannot address. APGA's comments, for the most part, will focus on the types of transmission lines operated by APGA members that are very different in how they are operated and the relative risk compared to the large, high pressure lines one typically thinks of when discussing transmission pipelines.

1. Should PHMSA increase the existing class location design factors in densely populated areas where buildings are over four stories?

APGA Response: No, the 0.4 design factor for Class 4 areas provides sufficient margin of safety for the areas in which Class 5, 6 and 7 factors were suggested. PHMSA should, however, delete 49 CFR 192.3(a) so that pipelines operating below 20% SMYS are not classified as transmission pipelines. Back in 1970 when the original pipeline safety regulations were promulgated classifying such line as transmission did not entail significant additional cost. Now integrity management requirements and proposals such as this impose potentially significant compliance costs that are not justified by the relatively low risk of low stress pipelines. PHMSA should delete 49 CFR 192.3(a) as it is unnecessary for safe operation of these pipelines.

2. Should class locations be eliminated and a single design factor used if IM requirements are expanded beyond HCAs?

APGA Response: Expanding IM requirements beyond HCA's would impact the types of pipeline described above that do not pose the level of risk of a high pressure, large diameter transmission line. In addition, class locations are referenced in many other sections of the pipeline safety regulations. There needs to be a thorough review of all the sections of the regulation that would be affected by eliminating the class location concept.

That said, APGA would support offering transmission pipeline operators the flexibility to use the PIR approach as an alternative when establishing MAOP's.

3. Should there only be a single design factor for areas where there are large concentrations of populations, such as schools, hospitals, nursing homes, multiple-story buildings, stadiums, and shopping malls, as opposed to rural areas like deserts and farms where there are fewer people?

No comment

4. Should operators be allowed to increase the MAOP of a pipeline from the present MAOP if a single design factor is created for all levels of population density?

No comment

5. If class locations are eliminated and a single design factor used, should that single design factor be applied to existing pipelines:

a. Installed before 1970 (pre-Federal regulation);

b. That use low-frequency electric resistance welded pipe, electric flash welded pipe, lap-welded pipe, or other pipe manufactured with a seam factor less than 1.0 in accordance with Section 192.113;

c. That include pipe without mechanical (strength) and chemical properties reports;

d. That include pipe that has not been tested at or above 1.25 times MAOP;

e. That include pipe that operates without a pressure test in accordance with the Grandfather Clause in Section 192.619(c);

f. That include pipe that is presently operating above the design factor of a Class 1 location due to the Grandfather Clause in Section 192.619(c); and

g. That include pipe with external coatings that shield cathodic protection?

No comment

6. Should a pipeline that is operated with a single design factor be subject to periodic operational IM measures, similar to the criteria for HCA locations, including:

a. Close interval surveys;

b. Coating surveys and remediation;

c. Stress corrosion cracking surveys (SCC) and segment replacement (if a SCC threat is found and not remediated);

d. An ongoing monitoring program for DC currents and induced AC currents in high-voltage power transmission line corridors (including proper remediation plans);

e. In-line tool inspections (ILI) to inspect for pipe metal loss (corrosion), cracks, hard spots, weld seams, and other integrity threats in steel pipe (ILI tool evaluations for metal loss must use specified-or-greater interaction criteria to ensure defects meet a minimum integrity criterion);

f. Repairs to defects within a periodic time interval that is based on maintaining the pipeline design safety factor with a maximum pipe wall loss;

g. Pipe surveys of the depth of cover over buried pipelines;

h. Data integration of all surveys, excavations, remediation, and other integrity threats; and

i. Pipeline remediation based on assessment and data integration findings.

APGA Response: Definitely not for the types of "transmission" operated by APGA members, e.g. low stress, small diameter pipes, particularly those that are "transmission only because of 49 CFR 192.3(a)

7. Should pipelines where a single design factor is used for establishing the MAOP be required to ensure that:

a. Pipe seam quality issues are assessed and those pipes with quality or integrity concerns are removed from service;

b. Pipe coatings on the pipeline and girth weld joints are non-shielding to cathodic protection;

c. Pipe in a cased crossing can be assessed for metallic and electrolytic shorts;

d. Pipe defects or anomalies that cause the pipeline to not meet the pipeline's MAOP are remediated based on the design factor of the pipeline with a maximum pipe wall loss;

e. All girth welds are nondestructively tested at the time of construction;

f. Minimum pipeline hydrostatic test pressures, based on MAOP and pipe yield strength, are met;

g. Maximum spacing for cathodic protection pipe-to-soil test stations exists;

h. Additional safety measures are implemented in areas with reduced depth of cover over buried pipelines;

i. Line-of-sight markings on the pipeline are maintained, except in agricultural areas or at large water crossings (such as lakes) where line-of-sight signage is not practical;

j. Monthly ground or aerial right-of-way patrols are performed;

k. The applicable best practices of the Common Ground Alliance are included in the operator's damage prevention program; and

l. The pipeline is incorporated into an IM program as a ''covered segment'' in a HCA in accordance with Section 192.903, which will include seven-year maximum periodic reassessment intervals according to § 192.939.

APGA Response: Definitely not for the types of "transmission" operated by APGA members, e.g. low stress, small diameter pipes, particularly those that are "transmission only because of 49 CFR 192.3(a)

8. Should a root cause analysis be required to determine the cause of all in-service and hydrostatic test failures or leaks?

APGA Response: Definitely not for the types of "transmission" operated by APGA members, e.g. low stress, small diameter pipes, particularly those that are "transmission only because of 49 CFR 192.3(a)

9. Should pipelines without documented and complete material strength, wall thickness and seam records for pipe, fittings, flanges, fabrications, and valves, in accordance with Sections 192.105, 192.107, and 192.109 be allowed to operate at the single design factor?

APGA Response: For lines operating under 30 % SMYS, yes. That stress level is already lower than the lowest design factor in the current rules.

10. Should operators of pipelines that are allowed to operate at the single design factor complete hydrostatic tests as required by Part 192, Subpart J, and maintain records as required in Section 192.517?

APGA Response: Definitely not for the types of "transmission" operated by APGA members, e.g. low stress, small diameter pipes, particularly those that are "transmission only because of 49 CFR 192.3(a)

11. Should pipelines, under a single design factor, be required to meet additional pipe manufacturing quality controls to minimize defects such as low-strength pipe, steel laminations, and pipe seam defects?

APGA Response: Definitely not for the types of "transmission" operated by APGA members, e.g. low stress, small diameter pipes, particularly those that are "transmission only because of 49 CFR 192.3(a).

12. Should pipeline construction personnel who would work in areas subject to the single design factor be required to take a construction operator qualification program?

No comment

13. For emergency response and pipeline isolation purposes in the event of a rupture or leak, if a single design factor is allowed, what should the maximum spacing be between the mainline valves on a pipeline?

a. Should all mainline valves be remotely or automatically activated if there is a rupture or leak on the pipeline?

b. If, during a rupture or a leak, the mainline valves are not remotely or automatically activated, what should the maximum time be for a pipeline crew to isolate the mainline section?

No comment

14. What should pressure limiting devices be set to for a pipeline operating with a single design factor?

No comment

15. If the design factors of class locations were to be eliminated, and a single design factor used instead, what additional design, construction, and operational criteria are required to maintain pipeline safety in urban areas and in rural areas?

No comment

APGA appreciates the opportunity to provide input to PHMSA on this issue. APGA welcomes any questions regarding these comments.

Bert Kalisch, President & CEO