Implementation Update
2019 Gas Transmission Regulation

Pennsylvania Pipeline Safety Seminar

September 9, 2021

Overview Topics

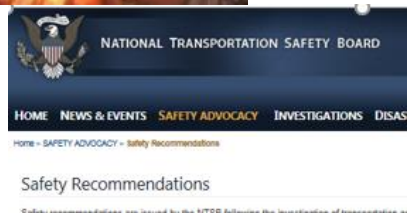
- 2019 Gas Rule History
- New Terms/Definitions
- Summary of Final Rule – Focus on 2 Key Initiatives
- Near-Term Implementation Dates
- Compliance Tools - FAQs, Pilot Inspections, and Training
- Inspection Strategy and Compliance Tools

Rule History

2010 | 2011 | 2012 | 2013 | 2014 | 2015

San Bruno, CA Incident 9/9/10 → NTSB Report 8/30/11

Sissonville, WV Incident 12/11/12 → NTSB Report 2/19/14



ANPRM 8/25/11

PSA of 2011 1/3/12

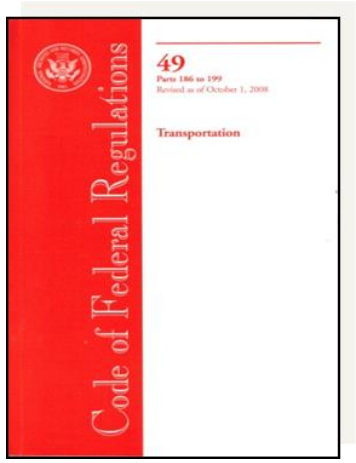
2016 | 2017 | 2018 | 2019 | 2020

NPRM 4/8/16

GPAC Meetings (5) 1/17 – 3/18

Final Rule 10/1/19

Gas Rule – Split Into Three Final Rules



- **RIN 1 – Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments**
  - **Final Rule Published October 1, 2019**
  - **Response to Industry Petition Published July 6, 2020**

- **RIN 2 – Repair Criteria, IM Improvements, Cathodic Protection, Management of Changes, and Other Related Amendments**
  - **Final Rule under Department Review**

- **RIN 3 – Gas Gathering**
  - **Final Rule under Department Review**

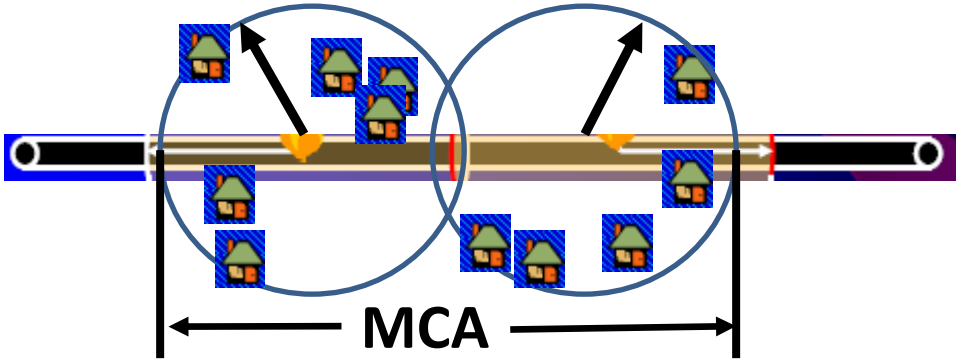
Overview of Final Rule

New Definitions and Terminology

Moderate Consequence Area (MCA)

- **Potential Impact Circle (PIC) contains 5 or more buildings intended for human occupancy or**
- **PIC contains any portion of paved surface of any designated interstate, other freeway, or expressway, as well as any other principal arterial roadway with 4 or more lanes**

MCA length extends axially along pipeline from outermost edge of first potential impact circle to outermost edge of last contiguous potential impact circle containing buildings/roads



New Definitions and Terminology

Traceable, Verifiable, & Complete (TVC) Records

- **Traceable: Records that can be clearly linked to original information about pipeline segment or facility.**

  Examples: pipe mill records, which include mechanical and chemical properties; purchase requisition; as-built documents indicating minimum pipe yield strength, seam type, wall thickness, and diameter.

New Definitions and Terminology

Traceable, Verifiable, & Complete (TVC) Records

- **Verifiable: Records are those in which information is confirmed by other complementary, but separate documentation.**

  Examples: pressure test of a segment complemented by pressure charts or field logs; purchase order to a pipe mill with pipe specifications verified by a metallurgical test of a coupon pulled from the same pipeline segment

New Definitions and Terminology

Traceable, Verifiable, & Complete (TVC) Records

- **Complete: Records finalized as evidenced by a signature, date, or other appropriate marking such as a corporate stamp or seal.**

  Example: Complete pressure testing record that identifies a specific segment of pipe, who conducted test, duration, medium, temperatures, accurate pressure readings, and elevation information, as applicable

New Definitions and Terminology

Engineering Critical Assessment (ECA)

- **Analytical assessment procedure based on:**
  - **Fracture mechanics principles**
  - **Relevant material properties**
  - **Operating history and environment**
  - **In-service degradation**
  - **Failure mechanisms including initial and final defect sizes**
  - **Maximum defect sizes based upon MAOP**
- **ECA must be documented**

New Definitions and Terminology

- **"Legacy" or "Grandfathered) pipe**
  - **192.619(c) (*i.e.,* pipeline segments where the MAOP is based upon the highest actual operating pressure records obtained during the 5-year interval between July 1, 1965, to July 1, 1970, when operators:**

- ✓ **do not have pressure test or**
- ✓ **do not have material property records or**
- ✓ **operate above 72% SMYS**

New Definitions and Terminology

Opportunistic Digs

- **The Rule allows Operators to gather these material properties "opportunistically"**
  - **Operators must define what an "Opportunistic Dig" means to them in its procedures – pretty much any time the operator is going safely expose the pipe.**

- **The Rule and preamble gives some guidance…**

Opportunistic Digs

- **Opportunistic Digs – From the rule:**
  - **Anomaly direct examinations**
  - **In situ evaluations**
  - **Repairs**
  - **Remediations**
  - **Maintenance**

  - **Excavations that are associated with replacements or relocations of pipeline segments that are removed from service.**
  - ***Other opportunities defined by the Operator….***

Summary of Final Rule

- **Two new long-term programs:**
  1. **MAOP Reconfirmation (§192.624) - 15 years**
     - **Material Verification (§192.607)**
  2. **Assessments outside of HCAs (§192.710) – Initial by 2034 and reassessments every 10 years, e.g. piggable MCAs over 30% SMYS**
- **Other miscellaneous changes:**
  - **Minor IMP changes**
  - **Launcher/Receiver Safety**
  - **MAOP Exceedance Reporting**
  - **Recordkeeping**

Summary of Final Rule
Long Term Action #1 - MAOP Reconfirmation

- **MAOP Reconfirmation (§192.624):**

  Applies to:

  - **HCAs, Class 3 locations, and Class 4 locations without records necessary to establish MAOP in accordance with 192.619(a)(2); and**
  - **Legacy lines operating at ≥ 30% Specified Minimum Yield Strength (SMYS) in HCAs, Class 3 locations, Class 4 locations, or piggable MCAs.**

Summary of Final Rule
Long Term Action #1 - MAOP Reconfirmation

- **MAOP Reconfirmation (§192.624) and Verification of Pipeline Material Properties and Attributes (§192.607)**
  - **Operator must have procedures which include:**
    - **Process for reconfirming MAOP**
    - **Performing spike test if used (§192.506) and material verification for line pipe and components (§192.607)**
  - **Operators must document and verify material properties and attributes where explicitly referenced in Part 192 (i.e. §192.624 and § 192.712)**

Summary of Final Rule
Long Term Action #2 - Assessments Outside of HCAs

- **Assessments Outside of HCA (§192.710)**
  - **Requires integrity assessment of steel gas transmission segments in Class 3/4 locations, and piggable MCAs operating at ≥ 30% SMYS**
  - **Complete initial assessment no later than July 3, 2034 and a recurring assessment at least once every 10 years thereafter**

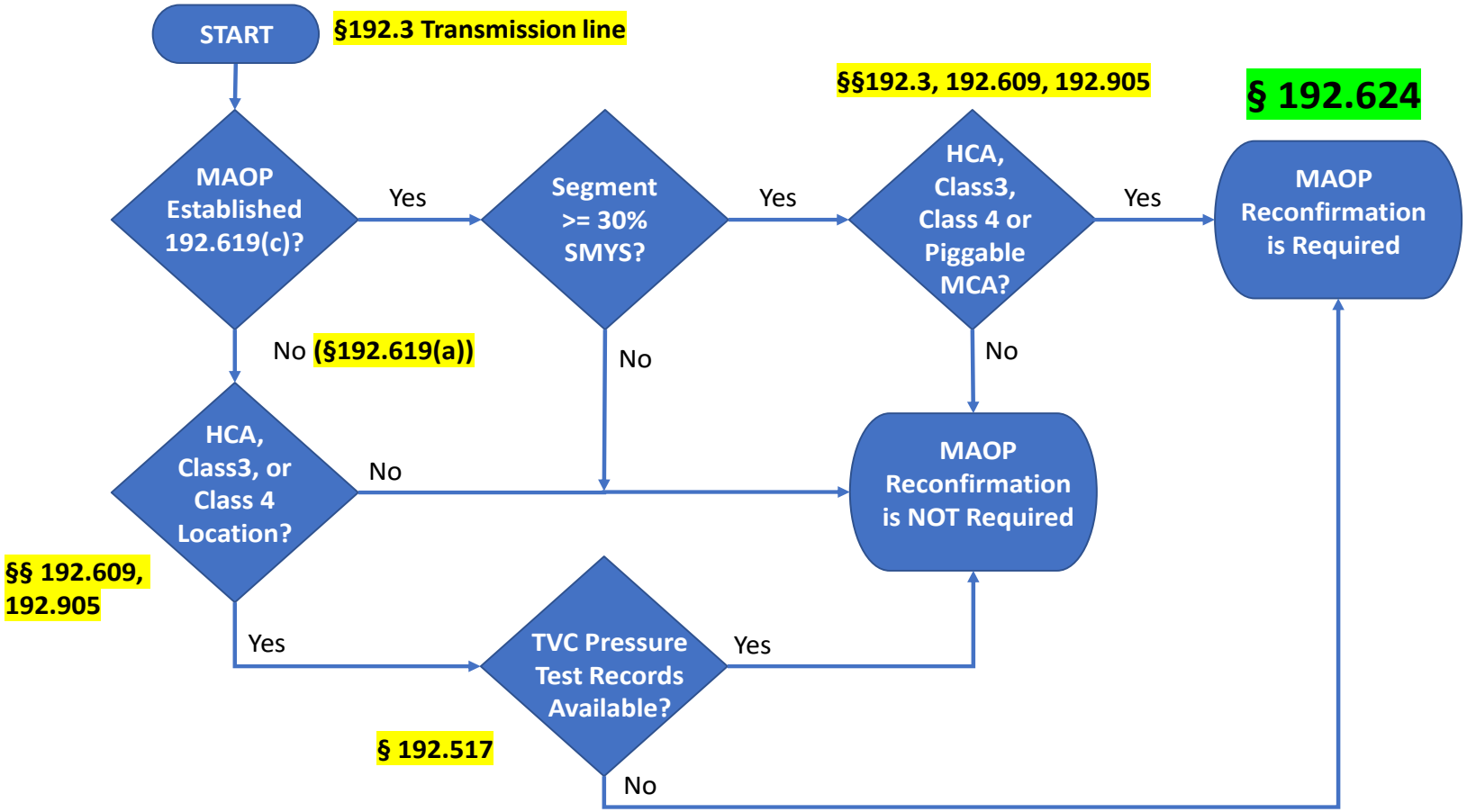
MAOP Reconfirmation
Long Term Action #1

§192.624 Applicability – Recap

1. Pre-1970 "grandfathered" pipeline applicability under 192.624(a) is for pipelines that: 1) do not have a hydrostatic pressure test, 2) do not have material properties and attributes, OR 3) operate over 72% of SMYS. MAOP for grandfathered pipelines was established using the five-year operating history between July 1965 – July 1970.
   a. For pipelines meeting the above applicability, MAOP reconfirmation must be done where the PIR intersects HCAs, piggable MCAs, and Class 3 and 4 locations operating over 30% SMYS for §192.619(c) pipe.
   b. Where the pipe SMYS or actual material yield and ultimate tensile strength is not known or not documented by traceable, verifiable, and complete records, then the operator must assume 30,000 p.s.i. or determine the material properties using §192.607 in determining if the pipeline is operating above 30% SMYS.
2. Post-1970 pipeline applicability under 192.624(a) is for pipelines that established their MAOP using 192.619(a).
   a. For pipelines meeting the above applicability, MAOP reconfirmation must be done where the PIR intersects HCAs and Class 3 and 4 locations.
   b. Post-1970 pipelines with a valid Subpart J hydrostatic pressure test do not need MAOP reconfirmation. See July 6, 2020 code revision.

§192.624 Applicability – Flow Chart

§192.624(a) Applicability of MAOP Reconfirmation: Onshore steel transmission pipelines.



Procedures and Completion Dates

§192.624 (b) *Procedures and completion dates.* Operators of a pipeline subject to this section must develop and document procedures for completing all actions required by this section by July 1, 2021. These procedures must include a process for reconfirming MAOP for any pipelines that meet a condition of §192.624(a), and for performing a spike test or material verification in accordance with §§192.506 and 192.607, if applicable. …

- **Operator must have procedures in place, including initial plans and schedules, on how they will implement all of the requirements in this code section for MAOP Reconfirmation.**
- **They should also have methods to Reconfirm the MAOP on applicable segments.**

Procedures and Completion Dates

(b) *Procedures and completion dates*. ……All actions required by this section must be completed according to the following schedule:
(1) Operators must complete all actions required by this section on at least 50% of the pipeline mileage by July 3, 2028.
(2) Operators must complete all actions required by this section on 100% of the pipeline mileage by July 2, 2035 or as soon as practicable, but not to exceed 4 years after the pipeline segment first meets a condition of §192.624(a) (*e.g.*, due to a location becoming a high consequence area), whichever is later.

- **All Operators must have an initial plan to accomplish MAOP reconfirmation on all applicable segments, aka 192.624 "covered segments", by the specified time frames. It can change as new risks are found, covered segments are added, or lines scheduled for abandonment.**
- **If a new 192.624 covered segment is found after July 2, 2031, they only have 4 years to reconfirm**

Reconfirmation Methods (192.624(c))

Onshore transmission pipelines needing to reconfirm MAOP must use one of the <u>following six methods</u>:

1. **Pressure Test (Subpart J)**
2. **Pressure Reduction(192.624(c)(1))**
3. **Engineering Critical Assessment (ECA) – using ILI Tools (192.632)**
4. **Pipe replacement (all of Part 192)**
5. **Small Potential Impact Radius (PIR) Pressure Reduction**
6. **Other Technology**

Method 2 – Pressure Reduction (192.624(c))

Reduce pressure, as necessary, and limit MAOP to no greater than the highest actual operating pressure sustained by the pipeline during the 5 years preceding October 1, 2019, divided by the greater of 1.25 or the applicable class location factor in §192.619(a)(2)(ii). The highest actual sustained pressure must have been reached for a minimum cumulative duration of 8 hours during a continuous 30-day period.

§192.624(c)(2) Reconfirmation Methods

Method 2 - Pressure Reduction (Revised 9/29/2021)

START

.624(c)(2)

Review operating pressures for the five (5) year look-back period preceding 10.01.19

Determine highest sustained operating Pressure reached for cumulative 8 hrs in a continuous 30-day period

The pressure value used as the highest actual sustained operating pressure must account for differences between upstream and downstream pressure on the pipeline by use of either:
(1) the lowest maximum pressure value for the entire pipeline segment; or
(2) using the operating pressure gradient along the entire pipeline segment

.624(c)(2)

Divide Pressure by the greater of 1.25 or the applicable class location factor in the table below (192.619(a)(2)(ii)):

Class location	Installed before (11/12/70)	Factors, segment— Installed after (11/11/70) and before 7/1/20	Installed on or after 7/1/20	Converted under §192.14
1	1.1	1.1	1.25	1.25
2	1.25	1.25	1.25	1.25
3	1.4	1.5	1.5	1.5
4	1.4	1.5	1.5	1.5

.624(c)(2)(i)(B)

.624(c)(2)(i)

Any Class Location changes per 192.611 in each segment?

No

Yes

For a **one** Class increase, apply reduction to Pressure – Class:
1 to 2 div. by 1.39
2 to 3, div. by 1.67
3 to 4 div. by 2.0

.624(c)(2)(i)(A)

For a **two** Class increase, apply reduction to Pressure:
Class 1 to Class 3 divide by 2.0

Final Pressure is the reconfirmed MAOP

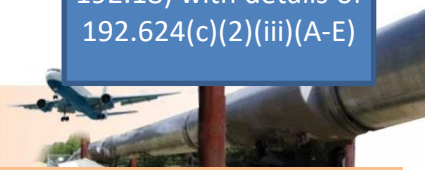
END

.624(c)(2)(iii)

Does operator need:
(a) less conservative reduction factor, or
(b) longer look-back period??

Yes

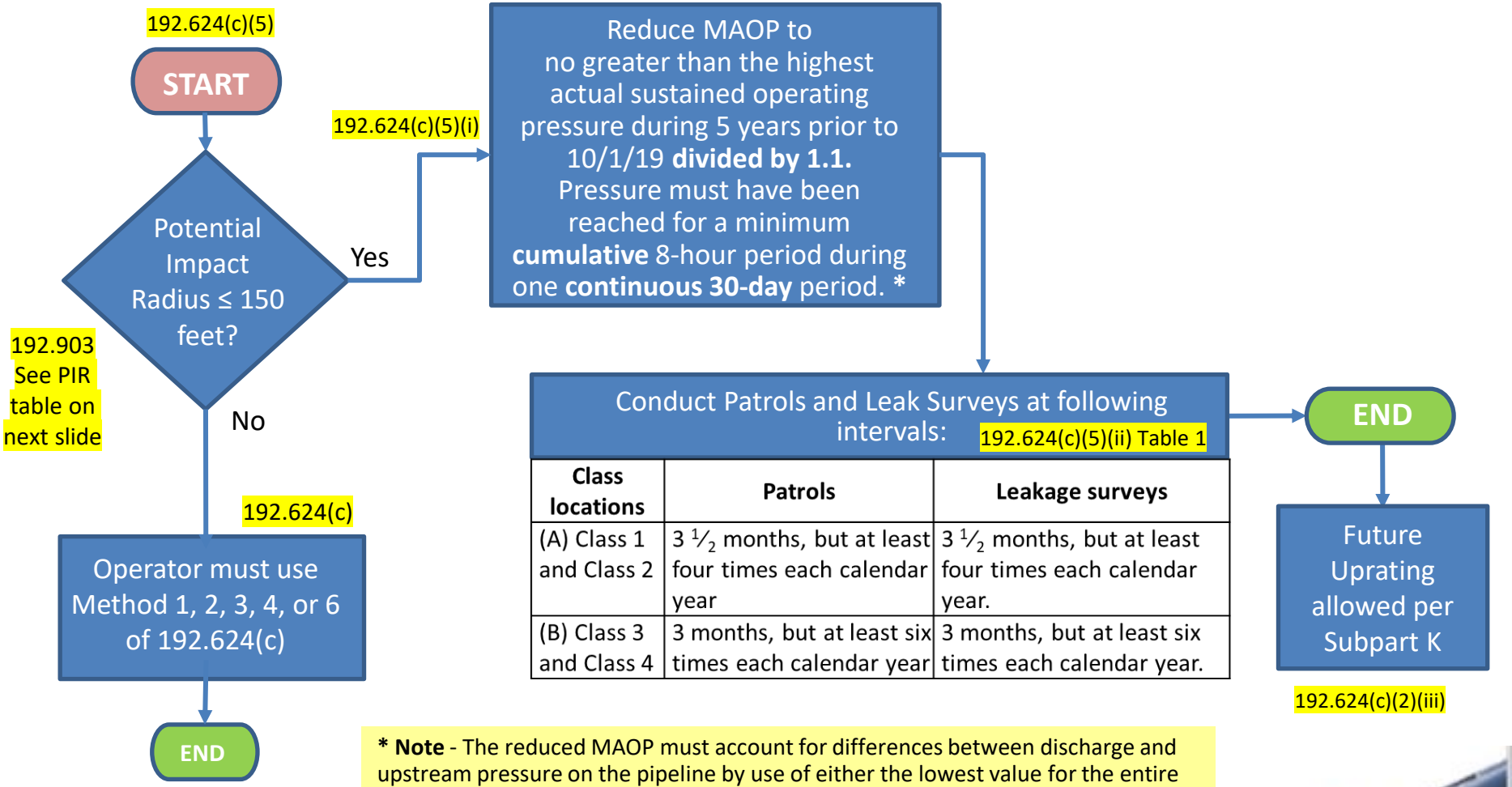
Notify PHMSA (per 192.18) with details of 192.624(c)(2)(iii)(A-E)



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

§192.624(c)(5) Reconfirmation Methods

Method 5 - Pressure Reduction for Pipeline Segments with Small PIR



Class locations	Patrols	Leakage surveys
(A) Class 1 and Class 2	3 ½ months, but at least four times each calendar year	3 ½ months, but at least four times each calendar year.
(B) Class 3 and Class 4	3 months, but at least six times each calendar year	3 months, but at least six times each calendar year.

*** Note** - The reduced MAOP must account for differences between discharge and upstream pressure on the pipeline by use of either the lowest value for the entire pipeline segment or the operating pressure gradient (i.e., the location specific operating pressure at each location).

§192.624(c)(5) – MAOP Reconfirmation Methods

(Method 5: Pressure Reduction for Pipeline Segments with Small PIR)

PIR Table for Natural Gas Potential Impact Radius, Rounded Up to the Nearest Foot

Green indicates MAOP vs. Pipe Diameter combination where Method 5 is allowed.

Nominal Pipe Diameter (Inches)

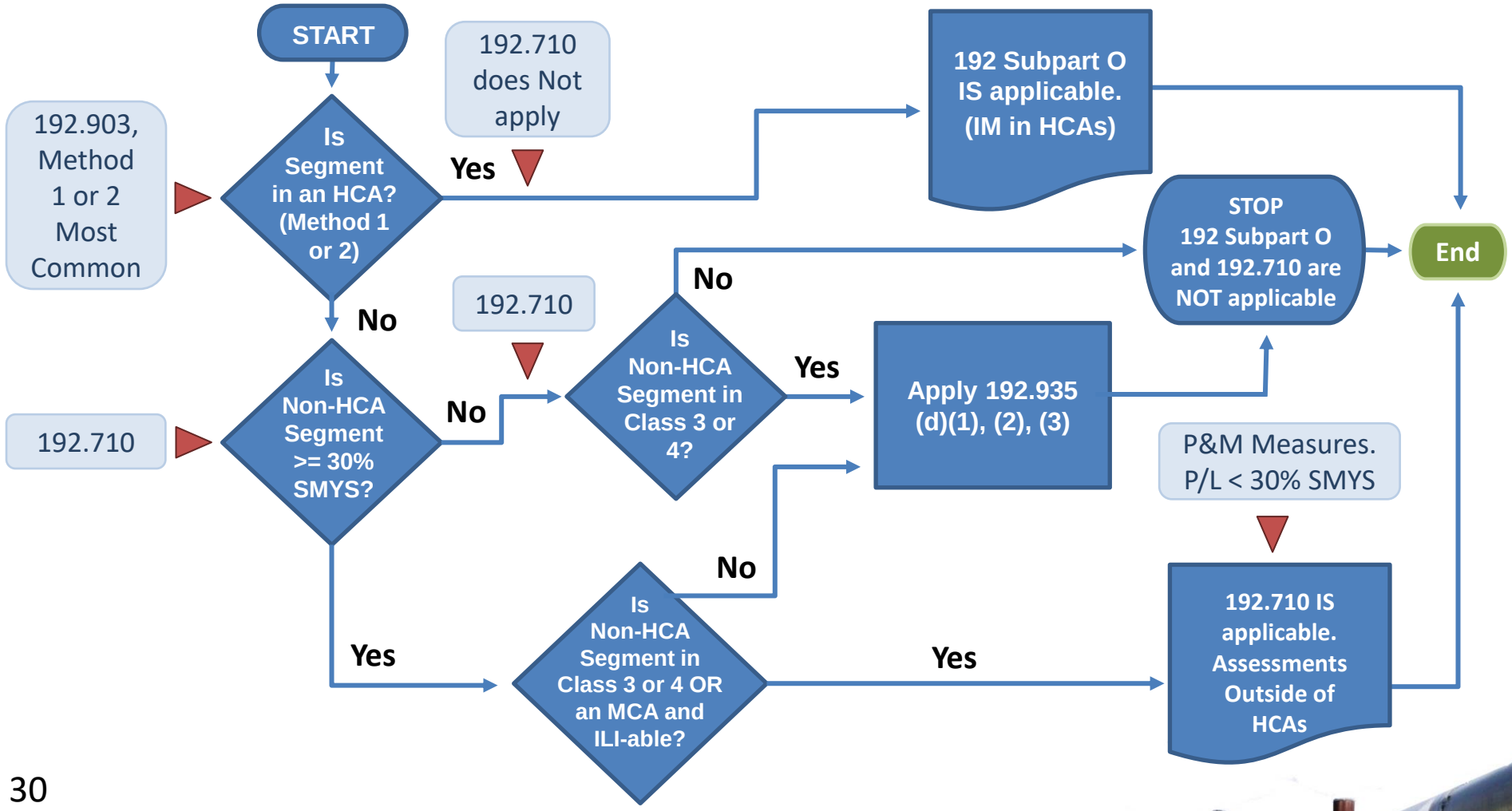
Maximum Allowable Operating Pressure (PSI)	4	6	8	10	12	14	16	18	20	22	24	30	36
50	20	30	40	49	59	69	79	88	98	108	118	147	176
100	28	42	56	69	83	97	111	125	138	152	166	207	249
150	34	51	68	85	102	119	136	153	170	186	203	254	305
200	40	59	79	98	118	137	157	176	196	215	235	293	352
250	44	66	88	110	131	153	175	197	219	241	262	328	393
300	48	72	96	120	144	168	192	216	240	263	287	359	431
350	52	78	104	130	155	181	207	233	259	284	310	388	465
400	56	83	111	138	166	194	221	249	276	304	332	414	497
450	59	88	118	147	176	205	235	264	293	323	352	440	527
500	62	93	124	155	186	217	247	278	309	340	371	463	556
550	65	98	130	162	195	227	259	292	324	357	389	486	583
600	68	102	136	170	203	237	271	305	339	372	406	508	609
650	71	106	141	176	212	247	282	317	352	388	423	528	634
700	74	110	147	183	220	256	293	329	366	402	439	548	658
720	75	112	149	186	223	260	297	334	371	408	445	556	667
750	76	114	152	189	227	265	303	341	378	416	454	567	681
800	79	118	157	196	235	274	313	352	391	430	469	586	703
850	81	121	161	202	242	282	322	363	403	443	483	604	725
900	83	125	166	207	249	290	332	373	414	456	497	621	746
950	86	128	171	213	256	298	341	383	426	468	511	639	766
1000	88	131	175	219	262	306	350	393	437	481	524	655	786
1050	90	135	179	224	269	314	358	403	448	492	537	671	805
1100	92	138	184	229	275	321	367	412	458	504	550	687	824
1150	94	141	188	234	281	328	375	422	468	515	562	702	843
1200	96	144	192	240	287	335	383	431	479	526	574	718	861
1250	98	147	196	244	293	342	391	440	488	537	586	732	879
1300	100	150	200	249	299	349	399	448	498	548	598	747	896
1350	102	153	203	254	305	355	406	457	508	558	609	761	913
1400	104	155	207	259	310	362	414	465	517	568	620	775	930
1440	105	158	210	262	315	367	419	472	524	577	629	786	943
1450	106	158	211	263	316	368	421	473	526	579	631	789	946
1480	107	160	213	266	319	372	425	478	531	584	638	797	956

Assessments Outside of HCAs
Long Term Action #2

Applicability

- **192.710: Transmission Lines: Assessments outside of High Consequence Areas (HCAs)**
- Onshore steel transmission pipeline segments with a **MAOP ≥ 30% Specified Minimum Yield Strength (SMYS)** located in a:
  - (1) Class 3 or 4 location, or
  - (2) A moderate consequence area (MCA) if the pipeline segment can accommodate inspection by an instrumented inline inspection tool (smart pig).
  - (3) This section does not apply to a pipeline segment located in an HCA.

192.710 Transmission lines: Assessments outside of HCAs



General – Assessment Timing

- **192.710 (b) (1) *Initial Assessment***
- An operator must perform initial assessments in accordance with this section based on a risk-based prioritization schedule and complete initial assessment for all applicable pipeline segments no later than **July 3, 2034**, or as soon as practicable but not to exceed 10 years after the pipeline segment first meets the conditions of § 192.710(a) (*e.g.*, due to a change in class location or the area becomes a moderate consequence area), whichever is later.

Near-Term Implementation Dates
Things That Can be Enforced Now

Near-Term Implementation Dates

- **By July 1, 2020 (Effective Date of Rule)**
  - **Report pressure exceedances (§191.23(a)(10), §191.25(b))**
  - **Maintain records to document class locations, including determination methods (§192.5)**
  - **Follow IBR documents**
  - **Begin to Identify, prioritize, and perform assessments (§192.710) outside HCAs, i.e. non HCA Class 3 and 4, and MCAs**
  - **Implement procedures addressing regulations without timeframes explicitly defined in final rule**

Near-Term Implementation Dates

- **July 1, 2021**
  - **Begin to use new Incident Report (Form PHMSA F 7100.2); current form posted to Docket PHMSA-2011-0023 on 10/24/2019**
  - **Operators subject to §192.624, develop and document procedures for completing all actions required for MAOP reconfirmation by this date (Requires they know their MCAs)**
  - **For GT pipe and components, have and begin to implement procedures for material properties and attributes verification**

Near-Term Implementation Dates

- **July 1, 2021**
  - **For GT pipe installed after this date, retain welder and/or plastic joiner qualification records for minimum of 5 years following construction**
  - **Any launchers/receivers used after this date must meet conditions of §192.750**

Near-Term Implementation Dates (Enforceable Soon)

- **March 15, 2022 – Annual Report Due (Form PHMSA F 7100.2-1)**
  - **Report on all MCAs and MAOP reconfirmation for pipeline segments operational as of December 31, 2021**

Compliance Tools

Frequently Asked Questions (FAQs), Pilot Inspections, and Training

PHMSA Gas Transmission IA Question Set

Integrity Management - High Consequence Areas

1. IM High Consequence Areas - HCA Identification *Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?* (IM.HC.HCAID.P) 192.905(a)

2. IM High Consequence Areas - HCA Identification *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?* (IM.HC.HCAID.R) 192.947(d) (192.905(a);192.907(a);192.911(a))

Frequently Asked Questions (FAQs) & Answers

- Solicited, and continue to solicit FAQs
  - Industry
  - State/Federal Regulators
  - Public

- Assist in implementation of final rule; provide
  - Clarity to existing requirements
  - Guidance
  - Information Sources

- Batched, draft FAQs posted in Federal Register to solicit public comment - Docket ID: PHMSA-2019-0225

FAQs & Answers – 1st Batch
Gas Rule FAQs

- **44 draft FAQs and Answers**
- **Posted for public comment January 30, 2020; comment period open until March 27, 2020**
- **Final Batch 1 FAQs Issued September 2020.**
- **Topical Areas include:**
  - **General**
  - **Reporting**
  - **Other Technology Notification**
  - **Moderate Consequence Area**
  - **MAOP Establishment and Reconfirmation**
  - **Spike Hydrostatic Testing**
  - **Material Verification**
  - **Failure Mechanics**
  - **Assessments Outside HCAs**

FAQs & Answers – 2nd Batch
Gas Rule FAQs

- Content includes 24 more FAQs to address:
  - New questions received at February 27, 2020 Public Meeting
  - New questions received on Docket (PHMSA-2019-0225) before March 27, 2020
- Posted Draft Batch-2 FAQs posted to Federal Register December 22, 2020 for comment (Closed March 16, 2021)
- Under Legal Review – Except for FQ 58 the revisions should be minor

FAQ Comments & Additional Questions

- **Propose new FAQs:**

  Submit additional questions/clarifications/hypothetical scenarios to docket PHMSA-2019-0225, at https://www.regulations.gov/docket?D=PHMSA-2019-0225

- **Modifying Batch-2 FAQs based on comments**

  Read comments to docket, PHMSA-2019-0225, at https://www.regulations.gov/docket?D=PHMSA-2019-0225

- **View public comments received on FAQs and draft answers posted to docket, PHMSA-2019-0225, at https://www.regulations.gov/docket?D=PHMSA-2019-0225**

Pilot Inspections

- Used to align PHMSA, States, and pipeline operators
  - Expectations
  - Guidance (FAQs)
  - Compliance criteria (Be based on 2 FAQ batches and explicit parts of regulation) - Fair Notice is Key
- Focused on nearer term requirements
  - Class location confirmation
  - MCA identification procedures and completion if applicable
  - Applicability of §§192.607, 192.624 and 192.710
  - Material verification procedures
  - MAOP reconfirmation procedures
  - Reporting

Pilot Inspections

- Performed by GRIT Team Members plus regional state and federal regulator SMEs (4-6)
  - Kentucky, Ohio, New York, and Virginia attended
- Utilized draft inspection questions, FAQs, and guidance material
- No enforcement (highlighted what items may be cited if left uncorrected)
- Timeframe: October 2020 – April 2021 (1 week ea.)
  - Done on just one of each operator's systems

Pilot Inspection Plan

- Boardwalk – October 2020
- Iroquois Gas – November 2020
- Louisville Gas & Electric – February 2021
- National Grid/MMT (192.607 only) – March 2021
- Dominion Energy Questar Pipeline – March 2021
- Southern Star Central Gas – April 2021

Note: Draft inspection questions used during pilots shared with Operators inspected during pilots.

Overarching Pilot Results
Program Positives

- **Pilot operators had started early with looking for seeking TVC records and identifying gaps**
- **Most operators had Robust Databases to House TVC and MAOP records**
- **MCA identification was far along**
- **Integrity Management groups were involved and tried to mesh with subpart O activities**

Overarching Pilot Results Program Issues (1/3)

- Order of Magnitude more complex than most PHMSA regulations – lots of ties to other code sections.
- Operators not as far along with program preparedness as they thought they were.
- Many issues found with the existing regulations related to MAOP determination (192.619) and class location revisions (192.611)
- Some of what was accepted in past inspections, e.g. hydrotest record acceptability per 192.517, may no longer be adequate.

Overarching Pilot Results Program Issues (2/3)

- **Differing regulatory interpretation between operators –**
  - **TVC records needed for more than just MAOP reconfirmation, e.g. 192.712.**
  - **Opportunistic dig definition**
  - **Personnel training and OQ component may require additional “covered tasks”**

Overarching Pilot Results
Program Issues (3/3)

- **MAOP exceedance recognition and reporting procedures and training inadequate.**

- **Applying 192.619(a)(4) and 192.712 after discrepancies with assumed material properties are found, i.e., finding “weak” pipe.**

- **Inspecting safety devices on launchers/receivers prior to use. Are there procedures before using each time?**

Overarching Pilot Results
Content Areas Needing Attention (1/3)

- **MAOP determination of line sections not clear if they are a §192.619 (a) or (c) line.**
- **Supporting records to either support the original MAOP determination and subsequent class revisions per §192.611 are missing.**
- **Operators not utilizing ILI surveys to identify areas of incomplete or inconsistent records as those to establish MAOP.**

Overarching Pilot Results
Content Areas Needing Attention (2/3)

- **Limiting themselves to just one MAOP reconfirmation method.**
- **Need to go back and collect materials from opportunistic digs if they were originally unsafe to do material testing, e.g. emergency repairs.**
- **How do they determine and apply population groups? Sampling frequency and spacing for each population group?**

Overarching Pilot Results
Content Areas Needing Attention (3/3)

- **Component applicability under 192.607(f) and its relation to MAOP reconfirmation/records.**

- **Defined maximum time after an Opportunistic Dig for time of discovery? 180 days like ILI?**

- **Inspection of launchers receivers – can both sides of ILI or pig be depressurized?; do they require calibrated gauges?**

Inspection Strategy and Compliance Tools

Inspection Strategy

- **Pilots Inspections (October 2020 – April 2021)**
- **Specialized Inspections (July 2021 – July 2028)**
  - **Some regions combining with previously scheduled Integrated Inspections.**
- **Integrated Inspections (TBD)**

Specialized Inspections

Intrastate Pipelines:

- **PHMSA provided inspection form to Pennsylvania on 7/26/2021 to use on Intrastate systems.**
- **PHMSA will be conducting inspections on interstate inspections using IA which mirrors the state and publicly posted forms.**
- **Recommend that this form be used to conduct specialized inspections by staff well versed in all parts of Part 192, particularly Subpart O and MAOP determination.**
- **Immediate Focus Should be on Adequacy of Procedures and Plans**

Gas Rule – Inspection Question Set (IA and State Regulator Form)

Two Versions: With Considerations; Without Considerations.

Four Components: Regulator Guidance (Opener); The 69 Questions; The Considerations; and The Appendices (A – E).

Who?	Version?	Q. Set Posted?	Guidance Loc.?
Federal Inspectors **using IA**	Version with Considerations	IA Program	IA Library & Embedded in Word/PDF
State Inspectors **using IA**	Version with Considerations	NAPSR Private site and IA Program	IA Library & Embedded in Word/PDF
State Inspectors **NOT** using IA	Version with Considerations	NAPSR Private site	Embedded in Word/PDF
General Public	PDF with **No** Considerations	PHMSA Website; Other?	Public Use Version – Appendices A – E Only

PHMSA Policy is to not share / distribute the Question Set containing considerations outside of the Federal and State pipeline regulatory organizations.

Inspection Assistant (IA)

Cat.2.P.2 IM.MC MCA Identification

Title	MCA Identification
Question ID	IM.MC.MCAIDENTIF.P - *Note new subgroup MC.*
Procedure (Question Text)	What is the methodology being used for identifying MCAs?
Considerations	1. How are "covered" roadways that could be affected by PIR identified by the operator? (See MCA definition in §192.3, under FHWA definition of designated or applicable roadways.) 2. How are Class 1 areas evaluated in order to identify "five or more buildings intended for human occupancy" that are within the PIR? [192.3] 3. Was the MCA identification completed by July 1, 2021? 4. Who is responsible for performing MCA identification? 5. How are personnel with this responsibility trained? 6. *Reference Gas Rule FAQs #1, 6, 7, 11,12, 13, 14, 54, and 55.*
Primary Code Ref.	192.624(a)(2)
Secondary Code Ref(s)	192.710(a)(2); FAQ-1; FAQ-6; FAQ-7; FAQ-11; FAQ-12; FAQ-13; FAQ-14; FAQ-54; FAQ-55
Directive	YES
Reserved for PHMSA comments:	

References to FAQs

Inspection Questions (State Form)

9. MAOP Reconfirmation - Methods

Are the procedures for conducting MAOP reconfirmation adequate for the methods used (or intended to be used) as required by §192.624(c)?

(MO.GOMAOP.MAOPRECONFIRMMETH.P) 192.624(c) (192.18;192 Subpart J;192.619(a)2);192.632)

Sat +	Sat	Concern	Unsat	N/A	NC

Considerations

1. What method(s) does the operator intend to use to reconfirm MAOP(s)?
   a. Note – the six allowed methods are described in detail in 192.624(c). See Appendix D (located at the bottom of this document) for MAOP Reconfirmation Methods 2 and 5 flow charts.
   b. Operators should plan for all methods that may be required to achieve MAOP reconfirmation, i.e., there should not be overreliance on just one reconfirmation method.
2. Do the procedures include plans to use MAOP reconfirmation tests (§192.624) for the operator's initial assessment of previously unassessed MCAs per 192.710?
3. These procedures must include a process for reconfirming MAOP for any pipeline that meets a condition of §192.624(a) applicability and for performing a spike test or material verification in accordance with §§192.506 and 192.607, if applicable.
4. If the operator uses (or intends to use) Method 3 - Engineering Critical Assessment (ECA) for MAOP reconfirmation, do the procedures for this method comply with §§ 192.632 and 192.712?
   a. If SMYS or actual material yield and ultimate tensile strength is not known or not documented by traceable, verifiable, and complete records, then the operator must assume 30,000 psi or determine the material properties using §192.607. [192.632(a)(2)(iv)]
5. If the operator intends to use an Alternative Reconfirmation Method for MAOP reconfirmation, has an alternative reconfirmation procedure been developed, including notification of PHMSA per §192.18?
6. Reference 2019 Gas Rule FAQ-8, FAQ-33, FAQ-34, FAQ-52, and FAQ-65.

References to Flow Charts in Appendices

Gas Rule – Public Question Set is Posted to PHMSA Website

As of 7.28.21

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Annual Reports, Incident and Accident Reports, National Registry Notifications, and OpID Assignment Request

Drug and Alcohol Forms

Inspection Forms

Reporting Forms

https://www.phmsa.dot.gov/forms/pipeline-compliance-forms

Pipeline Inspection Forms

Title	Description
PHMSA Gas Distribution IA Question Set	PHMSA Gas Distribution IA Question Set
PHMSA Gas Transmission IA Question Set	PHMSA Gas Transmission IA Question Set
PHMSA Hazardous Liquid IA Question Set	PHMSA Hazardous Liquid IA Question Set
PHMSA LNG IA Question Set	PHMSA LNG IA Question Set
PHMSA Underground Natural Gas Storage IA Question Set	PHMSA Underground Natural Gas Storage IA Question Set
PHMSA 2019 Gas Rule IA Question Set	PHMSA 2019 Gas Rule IA Directive
PHMSA Drug Alcohol IA Question Set	PHMSA Drug Alcohol IA Question Set

Last updated: Wednesday, July 28, 2021

Gas Rule – FAQs on PHMSA Website

https://www.phmsa.dot.gov/guidance?keywords=&issued_date_from=&field_issued_date_value_1=&page 80%

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Although some of the materials that can be accessed from this page may fall outside the definitions of "guidance" set forth in 49 CFR 5.25(c), PHMSA has determined that they include potentially useful information for stakeholders and is including them in this database in an effort to make these materials easie for members of the public to find. You may also find useful information that is potentially not accessed from the page in the links below:

- PHMSA FAQs
- PHMSA Advisory Bulletins
- Pipeline Enforcement Guidance
- Pipeline Glossary
- Pipeline Guidance Manuals
- Pipeline Operator Resources
- Pipeline Technical Resources
- Hazardous Materials Publications
- Hazardous Materials Safety Field Operations and Enforcement Guidance

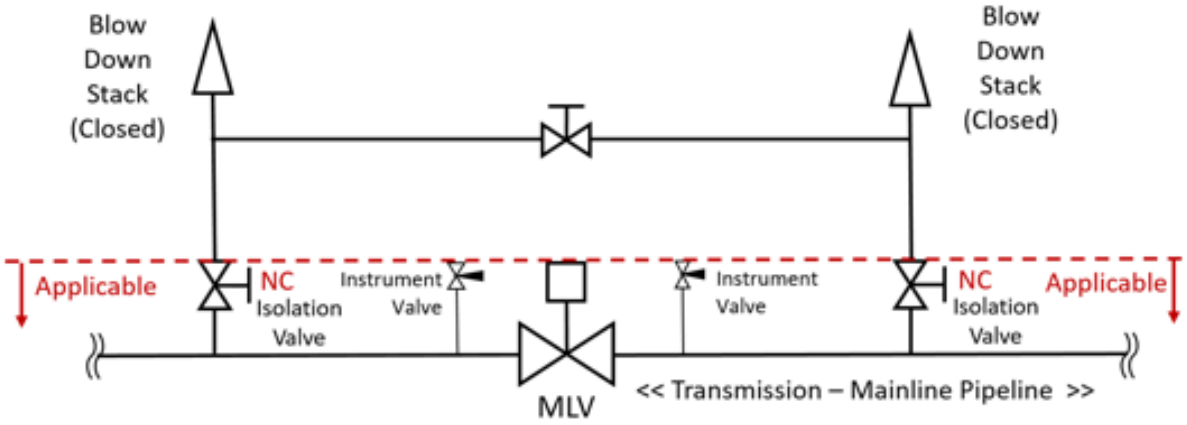
Members of the public may submit comments on draft guidance documents noticed in the Federal Register through Regulations.gov. Comments on any

Notice of Enforcement Policy Regarding Hazardous Materials Training Requirements for Maritime Workers		October 30, 2020
Notice of Administrative Discretion and Guidance for Renewal of RIN Approvals During the COVID-19 Public Health Emergency		September 28, 2020
Frequently Asked Questions (FAQs) on Gas Transmission Final Rule		September 15, 2020

1 2 3 4 5 6 7 8 9 … › »

Component Applicability Drawings
Example: §192.607(f) Verification of Pipeline Material Properties and Attributes for Components

Transmission MLV with Blow Down

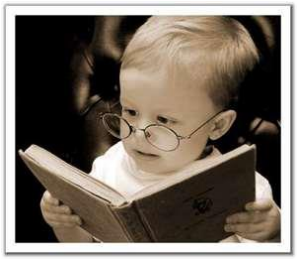


Legend:
FCV = Flow Control valve
M = Flow Meter
MLV = Mainline valve
NC = Isolation Valve (Normally Closed)
NO = Isolation Valve (Normally Open)
PCV = Pressure Control valve
RCV = Remote Controlled valve

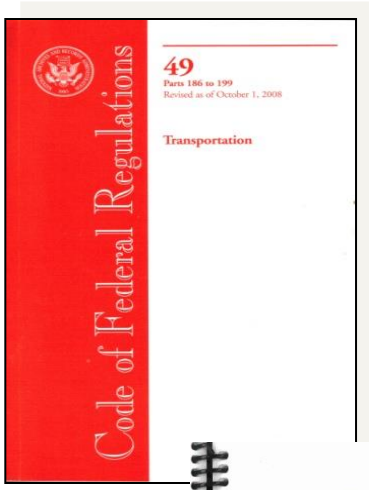
Applicability: (Transmission Mainline Pipeline and Facilities)

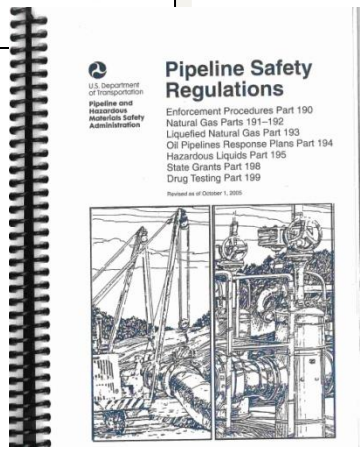
- Operates per 192.619(a) in an HCA or Class 3 or 4 location without a valid hydrotest used to establish or confirm MAOP.
- Operates per 192.619(c) and has an MAOP that is equal to or greater than 30% SMYS:
  - All Class 3, 4, or HCA areas.
  - MCA (regardless of class location) for pipelines that are piggable.

PHMSA disclaimer: The information contained in this work product are for educational and training purposes only. The document is intended to educate PHMSA and State pipeline safety inspectors on existing pipeline safety standards.



PHMSA Resources





- PHMSA Homepage, Office of Pipeline Safety
  - www.phmsa.dot.gov
- Standards & Rulemaking
  - http://www.phmsa.dot.gov/pipeline/regs
- PHMSA Technical Resources
  - https://www.phmsa.dot.gov/technical-resources/pipeline/pipeline-technical-resources-overview
  - GPAC Meeting slides for reference at “Public Meetings” tab (https://primis.phmsa.dot.gov/meetings/)
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Thank You!!

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