

# **2022 Pipeline Safety Seminar**

## **2021 Incidents & Non-Compliance Letters**

**Pennsylvania PUC - Pipeline Safety  
September 7 & 8, 2022**

# Regulations

Primary job of Pipeline Safety is to enforce:

- ▶ US DOT regulations
  - 49 CFR 191 Reporting
  - 49 CFR 192 Natural Gas
  - 49 CFR 193 Liquefied Natural Gas
  - 49 CFR 195 Hazardous Liquids
  - 49 CFR 199 Drug and Alcohol Testing & Part 40
  
- ▶ State regulations in Title 52 PA Code
  - Chapter 59 Gas service

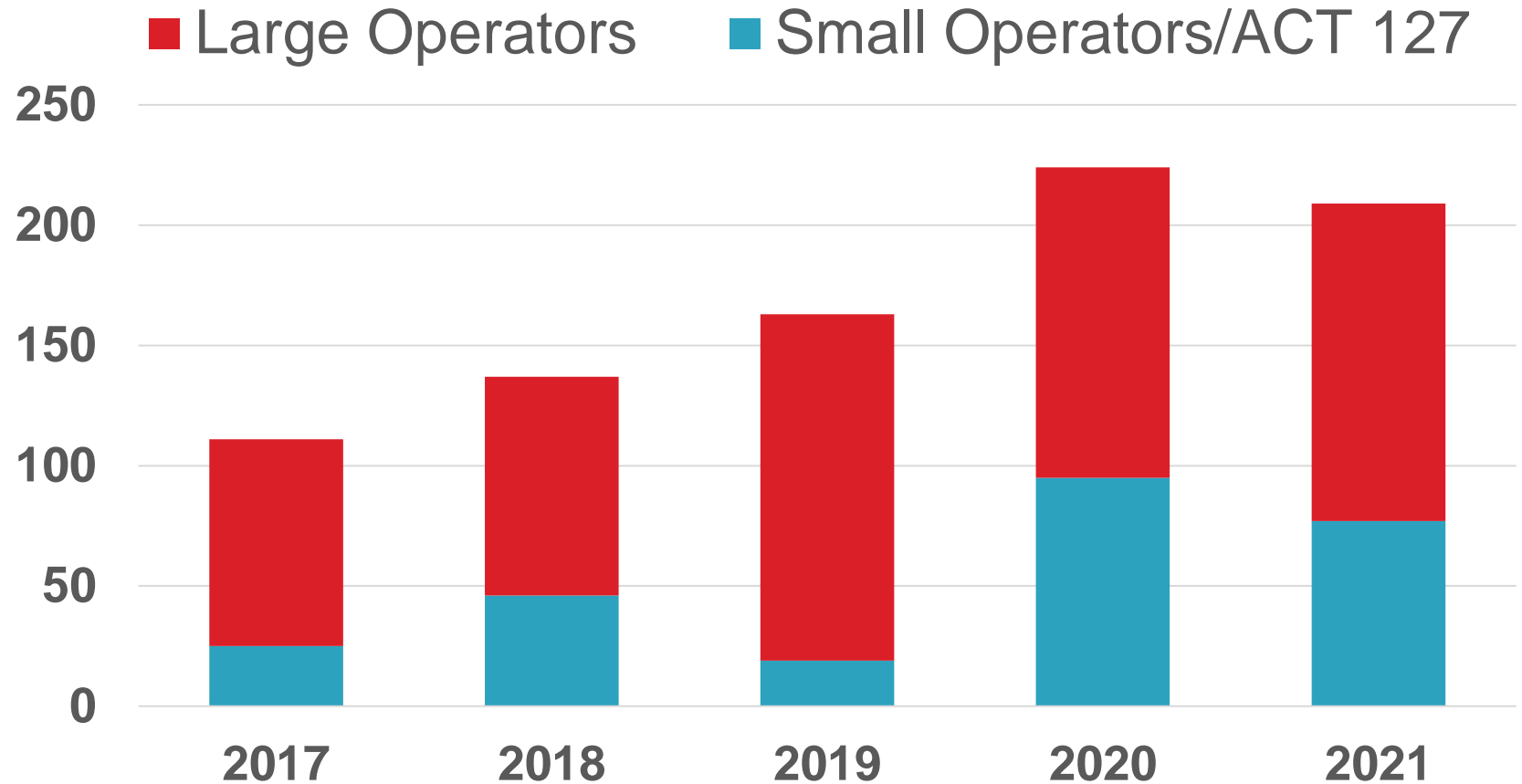
# 2021 Inspection Data

- ▶ **2,585** Inspection Days
- ▶ **3,323** Total Inspections
- ▶ Pipeline Safety Engineers get one inspection day per day in the field, even if we do more than one inspection in a day

# NC Letter Breakdown

- ▶ **66** (78) Non-compliance letters 2021 (2020)
  - These NC Letters resulted in...
- ▶ **209** (224) violations (state and federal) within those non-compliance letters

# Number of Violations Found in Last Five Years



# Where Do We Find Violations?

## Part 192 Violations 2021

- ▶ 17 Subpart A – General
- ▶ 0 Subpart B - Materials
- ▶ 0 Subpart C – Pipe Design
- ▶ 3 Subpart D – Design of Pipeline Components
- ▶ 0 Subpart E – Welding
- ▶ 4 Subpart F – Joining of Materials
- ▶ 4 Subpart G – General Const. Requirements
- ▶ 0 Subpart H – Customer Meters & Services

# Where Do We Find Violations?

## Part 192 Violations 2021 (con't)

- ▶ 11 Subpart I – Corrosion Control
- ▶ 3 Subpart J – Test Requirements
- ▶ 77 Subpart L – Operations
- ▶ 11 Subpart M – Maintenance
- ▶ 10 Subpart N – Operator Qualification
- ▶ 0 Subpart O – Gas TAMP
- ▶ 3 Subpart P – DIMP

# Where Do We Find Violations?

## **PA Code Chapter 59**

- ▶ 41 violations

## **Part 191 (Reporting)**

- ▶ 5 violations

## **Part 193 (LNG)**

- ▶ 3 violations

## **Part 195 (Liquids)**

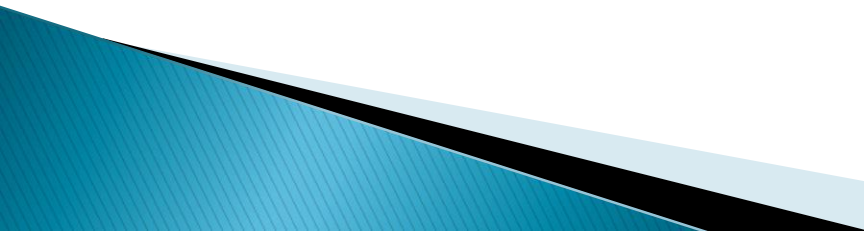
- ▶ 4 violations

## **40 & Part 199 (Drug & Alcohol)**

- ▶ 13 violations
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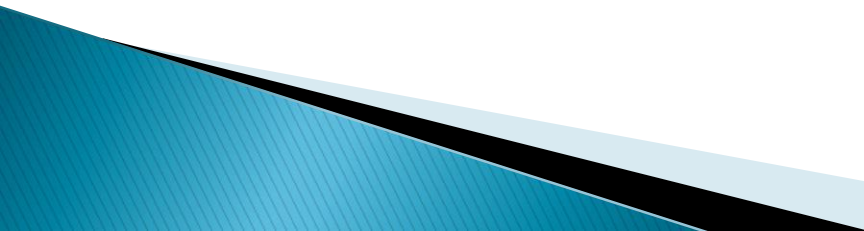
# Repeat issues

- ▶ Excavation damage due to missing marks and inaccurate marks (mapping issues)
  - ▶ Stub services not being **marked** and **damaged**
  - ▶ Mark outs not made within the entire project limits
  - ▶ Plastic Fusion issues
  - ▶ Inadequate or Missing Program Manuals
  - ▶ Procedures, Procedures & Procedures
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# Overpressure Protection

- ▶ §192.195 – Overpressure Protection Where Required:
  - §192.199 (a – h) – Design, Installation and Materials
  - §192.201 – Capacity, Pressure Settings, Overpressure Protection
  - PHMSA Advisory Bulletin (ADB-20-02) stemming from Merrimack Valley incident

# 2021 Incidents & Accidents

- ▶ During 2021, the Pipeline Safety Division investigated nine reportable incidents/accidents. Five incidents occurred on gas facilities and four accidents on hazardous liquid pipelines.
  - ▶ Two natural gas explosions with injuries and one fatality
  - ▶ Three gas leaks releasing over 3 million cubic feet, one caused by flood damage, one due to damage in a trench and one failure at a butt fusion.
  - ▶ Four hazardous liquid accidents resulted in a total of less than 20 barrels of hydrocarbons released. No injuries were reported.
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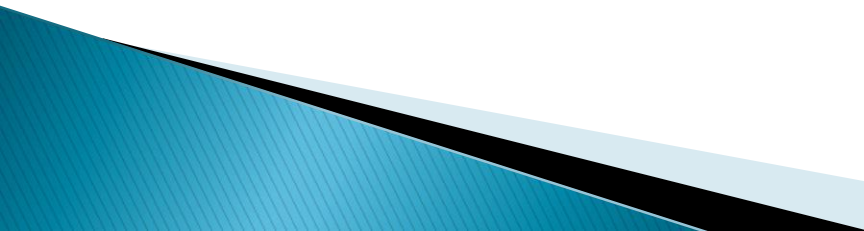
# Equipment Failure and Response

## **Section 192.613 (a)**

Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, **failures**, leakage history, corrosion, substantial changes in cathodic protection requirements, **and other unusual operating and maintenance conditions.**

## **Section 192.617**

Each operator shall establish **procedures for analyzing** accidents and **failures**, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, **for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.**



**Thank you for your  
attention!**

