

Pipeline Safety Seminar

2019 Review of Non-Compliance Letters & Incidents

**Pennsylvania PUC - Pipeline Safety
September 10th, 2020**

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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

- ▶ State regulations in Title 52 PA Code
 - Chapter 59 Gas service

Operators

- ▶ There are currently 138 operators in PA (counting Distribution, Gathering, Transmission, Master Meter, Underground Storage and Hazardous Liquid operators)
 - ▶ 49 CFR 192 - Effective 1971
 - Operators had 49 years to adopt and comply to minimum standards...with some changes and additions over the years
 - Operators get to write their own procedures to comply with and exceed the code
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2019 Inspection Data

- ▶ **1,641** Inspection Days
- ▶ **2,566** 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


Non-compliance Letters – Why?

- ▶ Inform operators of a non-compliance with State or Federal code
- ▶ Creates a “Legal” record of the non-compliance
- ▶ Expected that Operators apply required corrections across all operating areas and ensure it is not repeated – now or later

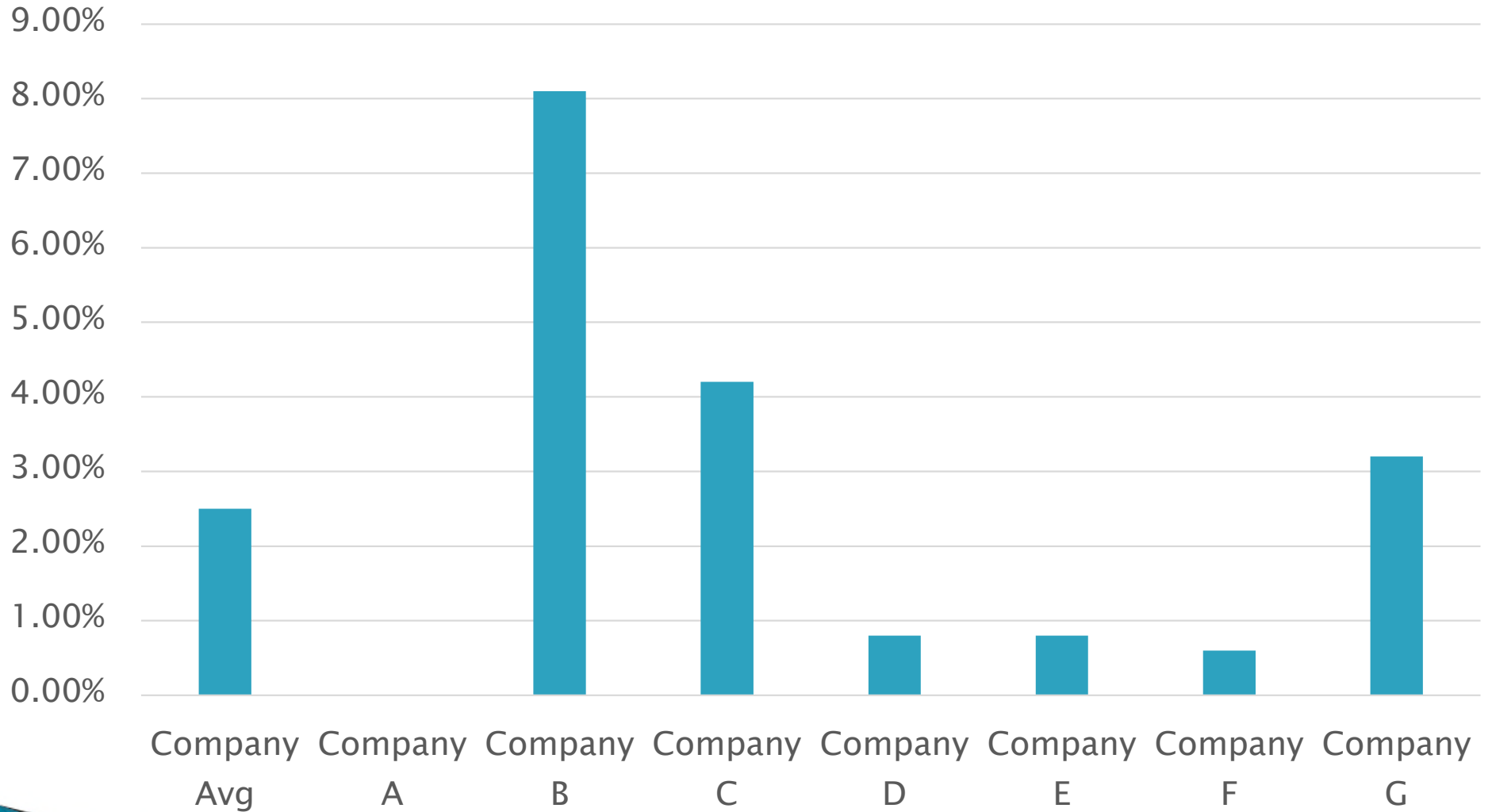
So, take the information from today’s presentation and apply to your system proactively:



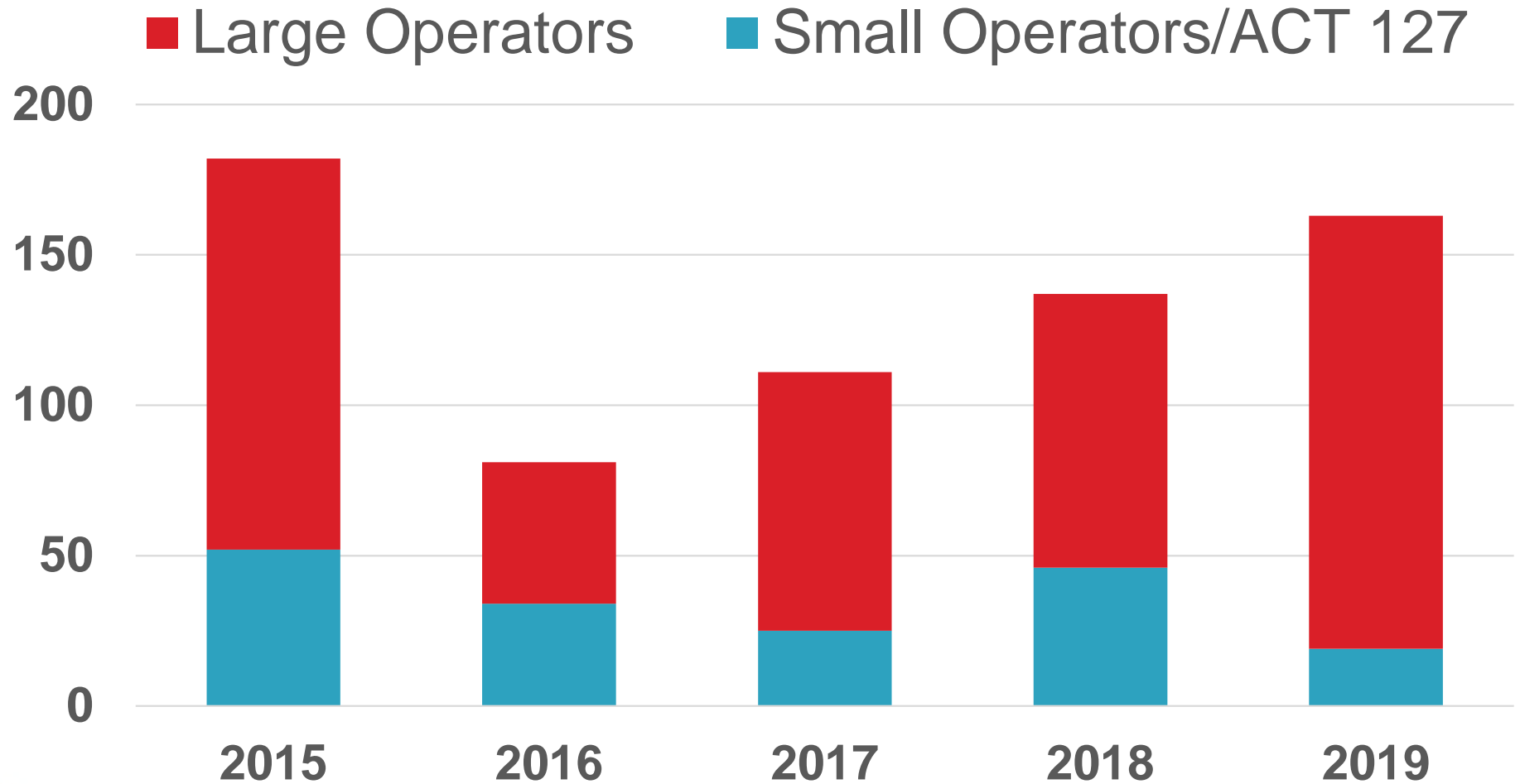
NC Letter Breakdown

- ▶ **66** Non-compliance letters in 2019
 - These NC Letters resulted in...
 - ▶ **163** violations (state and federal) within those non-compliance letters
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2019 NC Letter Percentage

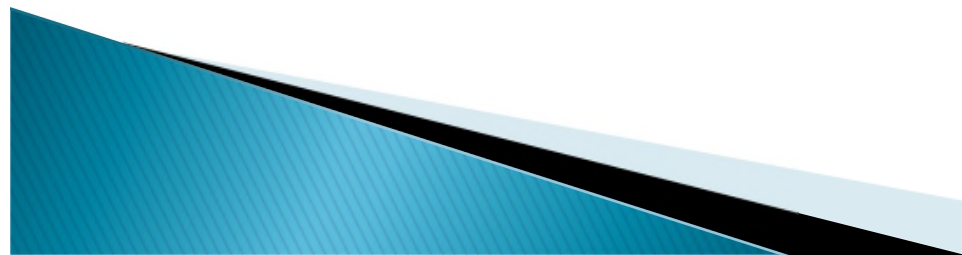


Number of Violations Found in Last Five Years



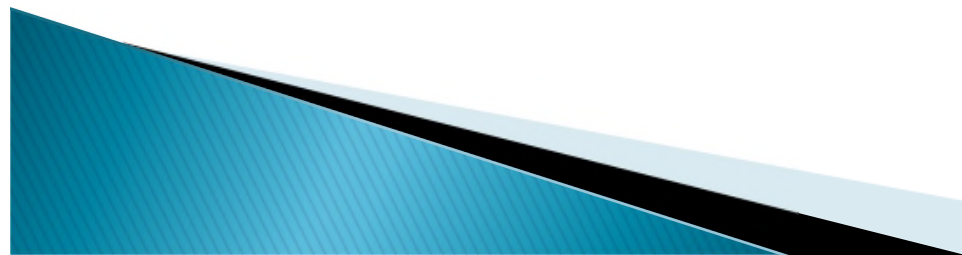
Where Do We Find Violations?

Part 192 Violations 2019 and (2018)

- ▶ 13 (15) - Subpart A – General
 - ▶ 1 (2) - Subpart C – Pipe Design
 - ▶ 7 (0) – Subpart D – Design of Pipeline Components
 - ▶ 0 (7) - Subpart E – Welding
 - ▶ 1 (1) - Subpart F – Joining of Materials
 - ▶ 2 (0) – Subpart G – General Const. Requirements
 - ▶ 1 (0) – Subpart H – Customer Meters & Services
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Where Do We Find Violations?

Part 192 Violations 2019 and (2018) (con't)

- ▶ 6 (0) – Subpart I – Corrosion Control
 - ▶ 6 (0) - Subpart J – Test Requirements
 - ▶ 58 (47) - Violation of Subpart L – Operations
 - ▶ 18 (10) - Violation of Subpart M – Maintenance
 - ▶ 1 (5) - Violation of Subpart N – Operator Qualification
 - ▶ 5 (2) - Violations of Subpart P – DIMP
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Where Do We Find Violations?

PA Code Chapter 59

- ▶ 27 (27) - violations

Part 191 (Reporting)

- ▶ 3 (2) - violations

Part 193 (LNG)

- ▶ 2 (1) - violation


Part 195 (Liquids)

- ▶ 5 (14) - violations

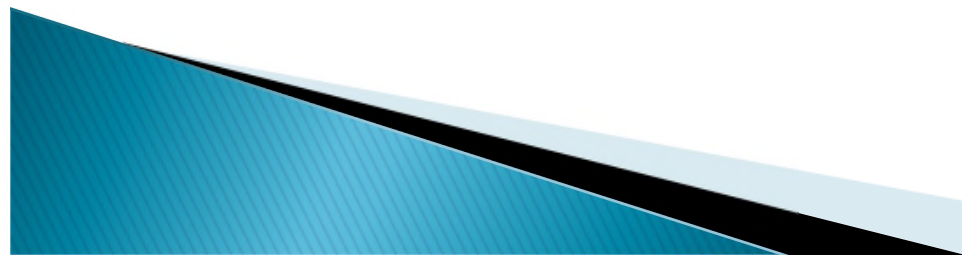
Other

- ▶ 3 (2) violations
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Repeat issues

- ▶ Excavation damage due to inaccurate or missing marks
 - ▶ Stub services not being marked
 - ▶ Mark outs not made within the entire project limits
 - ▶ Vehicular damage to meter sets
 - ▶ Insufficient valves
 - ▶ Insufficient relief capacities
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Reportable Incidents

- ▶ In 2019 Pennsylvania had 6 reportable Incidents with 2 Fatalities as defined in 191.3
 - ▶ In 2019 Pennsylvania had 1 reportable Accident as defined in 195.50
 - ▶ There were 7 events that were found to be Non-Reportable
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Explosion during Uprating



Cast Iron break



Failure of Temporary Meter Set



Horizontal Directional Drill



UTV Damaged a 2" Blow down



Plow damaged 6" Steel main



Fuel leak at a control line



**Thank you for your
attention!**

