

# **Pipeline Safety Seminar**

## **2018 Non Compliance Letter Review**

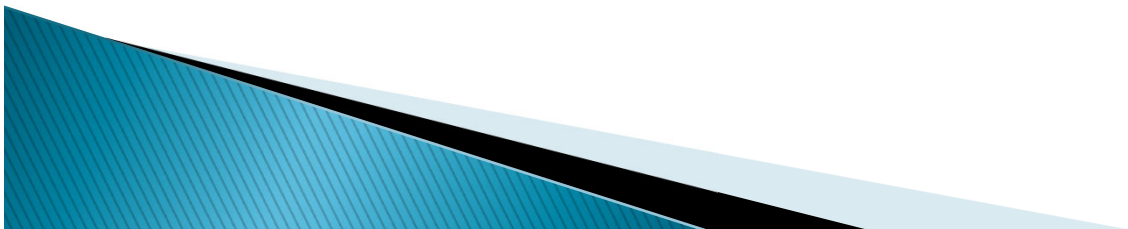
**Pennsylvania PUC - Pipeline Safety**  
**September 4<sup>th</sup> & 5<sup>th</sup>, 2019**

**Scott Orr & Matt Matse**

# Regulations

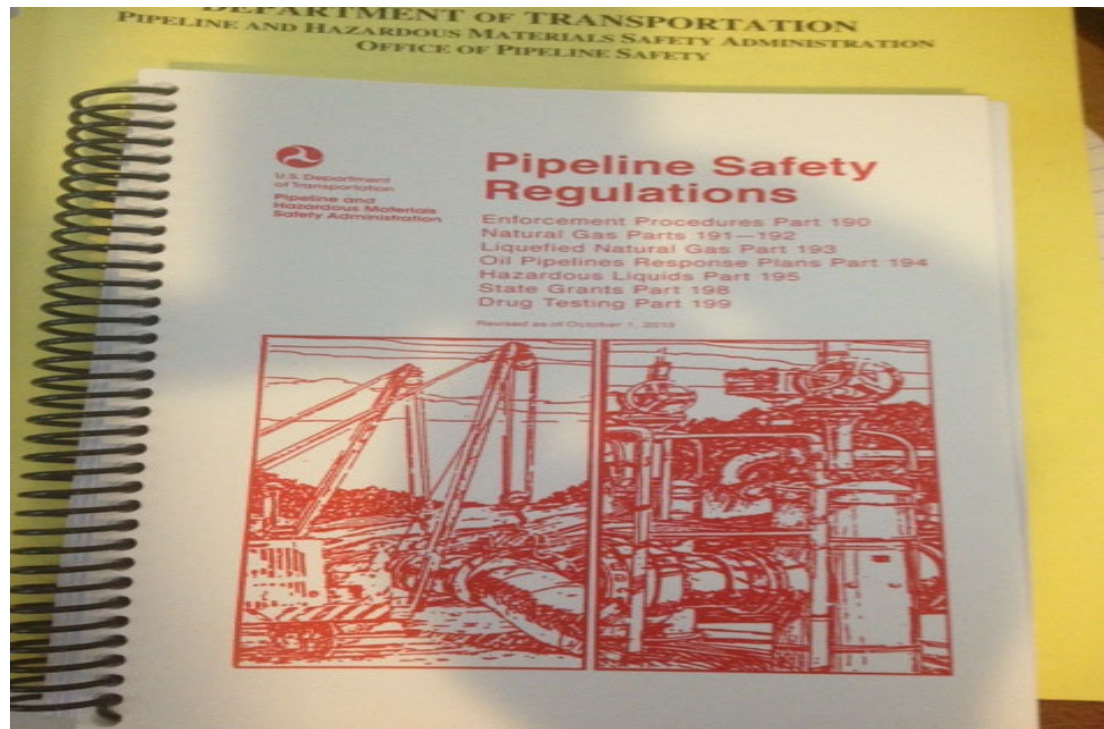
Primary job of Pipeline Safety is to enforce:

- ▶ US DOT regulations
  - 49 CFR 191 Reporting
  - 49 CFR 192 Natural Gas
  - 49 CFR 193 Liquefied Natural Gas
  - 49 CFR 195 Hazardous Liquids
  
- ▶ State regulations in Title 52 PA Code
  - Chapter 59 Gas service



# Says who? US DOT - PHMSA

- ▶ DOT regulations prescribes the minimum safety requirements for pipeline facilities and transportation of hazardous materials



# Operators

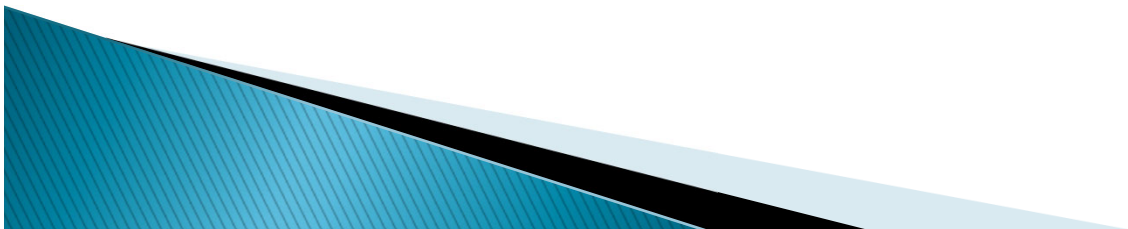
- ▶ There are 7 large operators and 16 smaller companies in PA (not counting Master Meter or Liquids operators)
- ▶ 49 CFR 192 - Effective 1971
  - Operators had 48 years to adopt and comply to minimum standards...with some changes and additions over the years
  - Operators get to write their own procedures to comply with and exceed the code



# 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:



# Non-compliance Letters – Quota?

We care about Safety!

Inspectors

**DO NOT**

have an NC quota  
to meet!





# 2018 Inspection Data

- ▶ 1,713 Inspections: Pipeline Safety Engineers get one inspection day per day in the field, even if we do more than one inspection that day
  - 1510 inspections – Larger Operators
  - 127 inspections – ACT 127
  - 76 inspections – Small Operators
- ▶ 52 Non-compliance letters in 2018
  - 137 violations (state and federal) within those non-compliance letters 91-Large & 46-ACT 127 Small



# NC Letter Breakdown

- ▶ 52 Non-compliance letters in 2018
  - Non-compliance letter breakdown
  - 38 - Large Operators
  - 14 - ACT 127 & Small Operators
- ▶ 137 violations (state and federal) within those non-compliance letters
- ▶ 91 - Large Operators
- ▶ 46 - ACT 127 & Small Operators





# Who is inspected the most?

Inspections are assigned based on:

- Size of the operator, number of “shops”
- Customer base
- Number of known problems with the system
- Risk assessment analysis
  - FL-1 data
- Data from incidents
- Complaints from customers
- PHMSA requirements

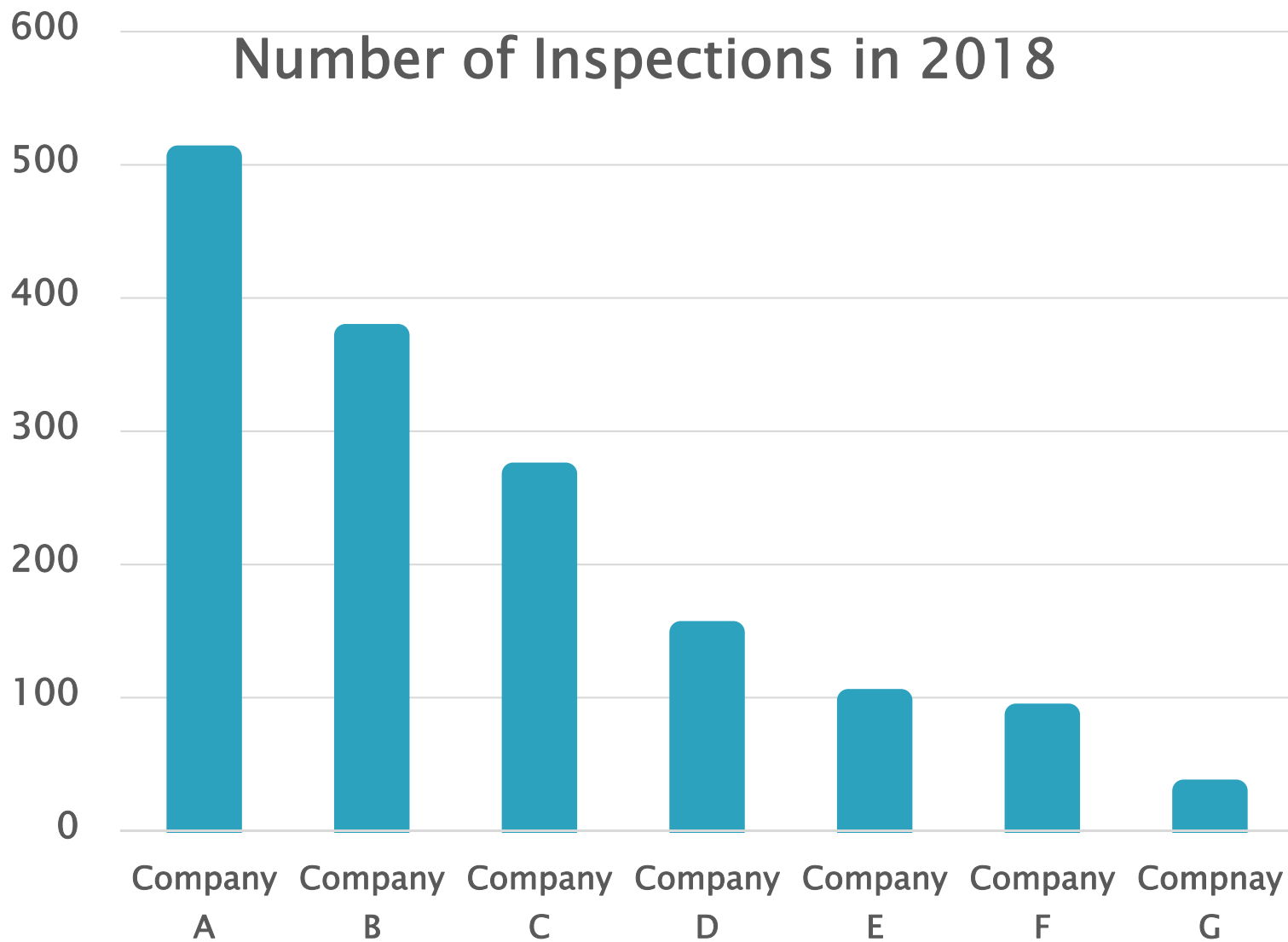


# Inspectors

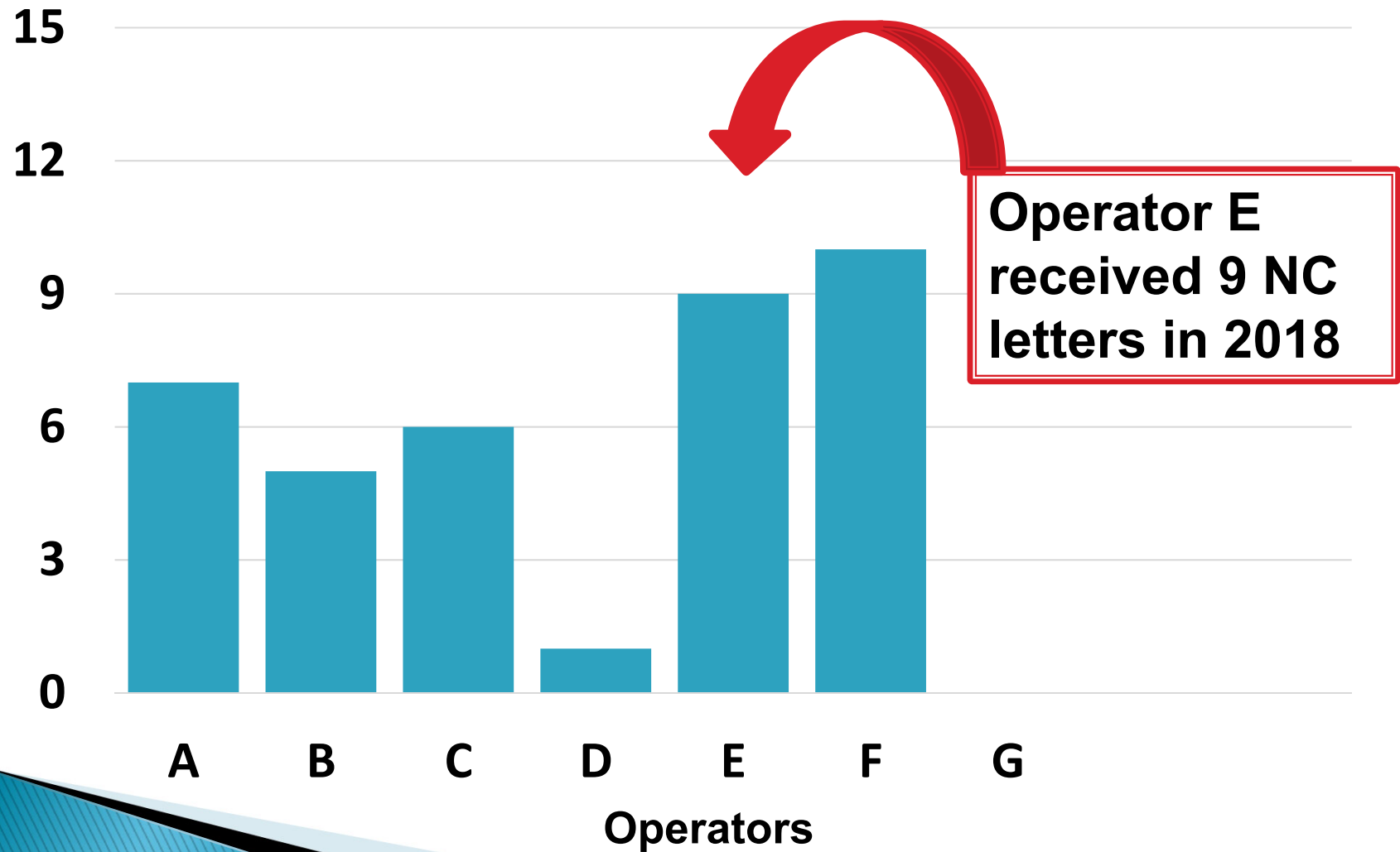
- ▶ 16 inspectors and 4 supervisors in Pipeline Safety division as of today but no Betty or Paul
  - 2019 – 16 inspectors
  - 2018 – 14 inspectors
  - 2017 – 11 inspectors
  - 2016 – 9 inspectors
- ▶ Number of inspectors is expected to go up...



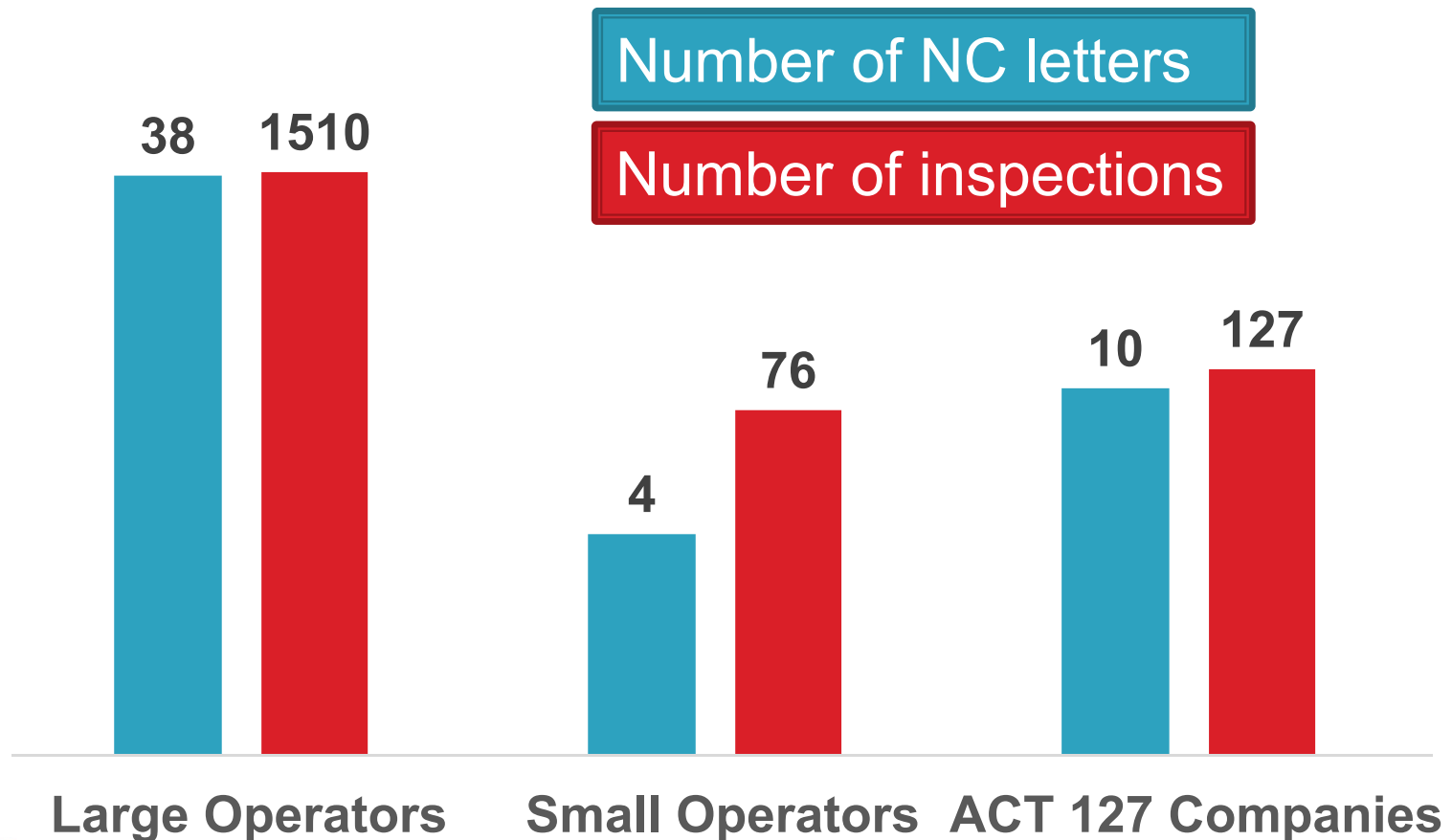
## Number of Inspections in 2018



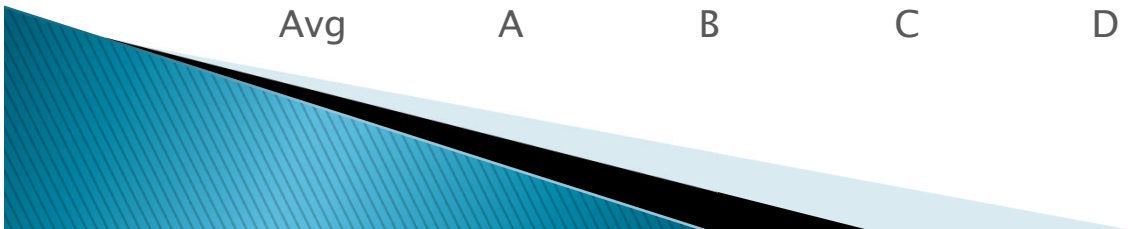
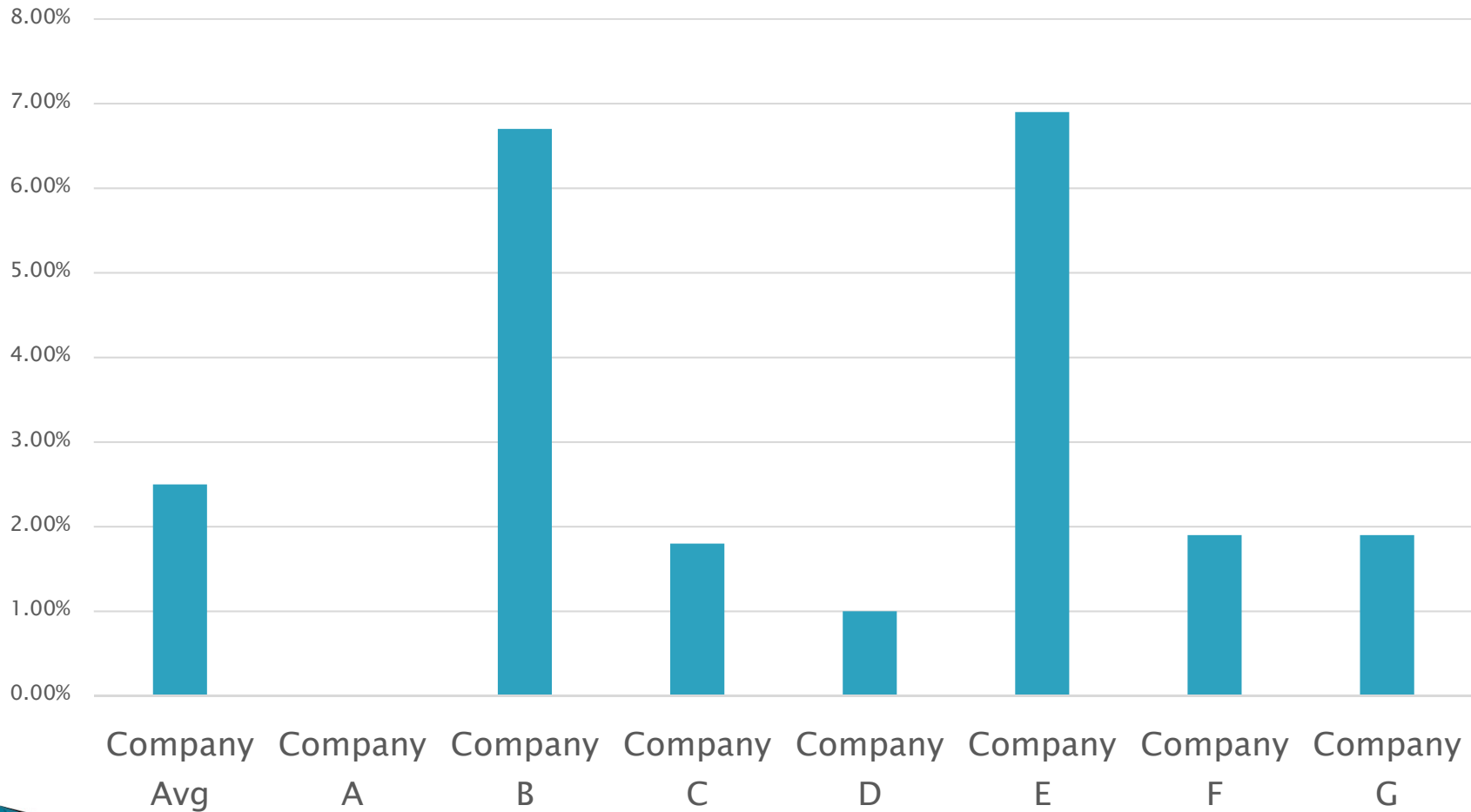
# Number of NC Letters in 2018



# Number of Inspections vs. NC letters received in 2018

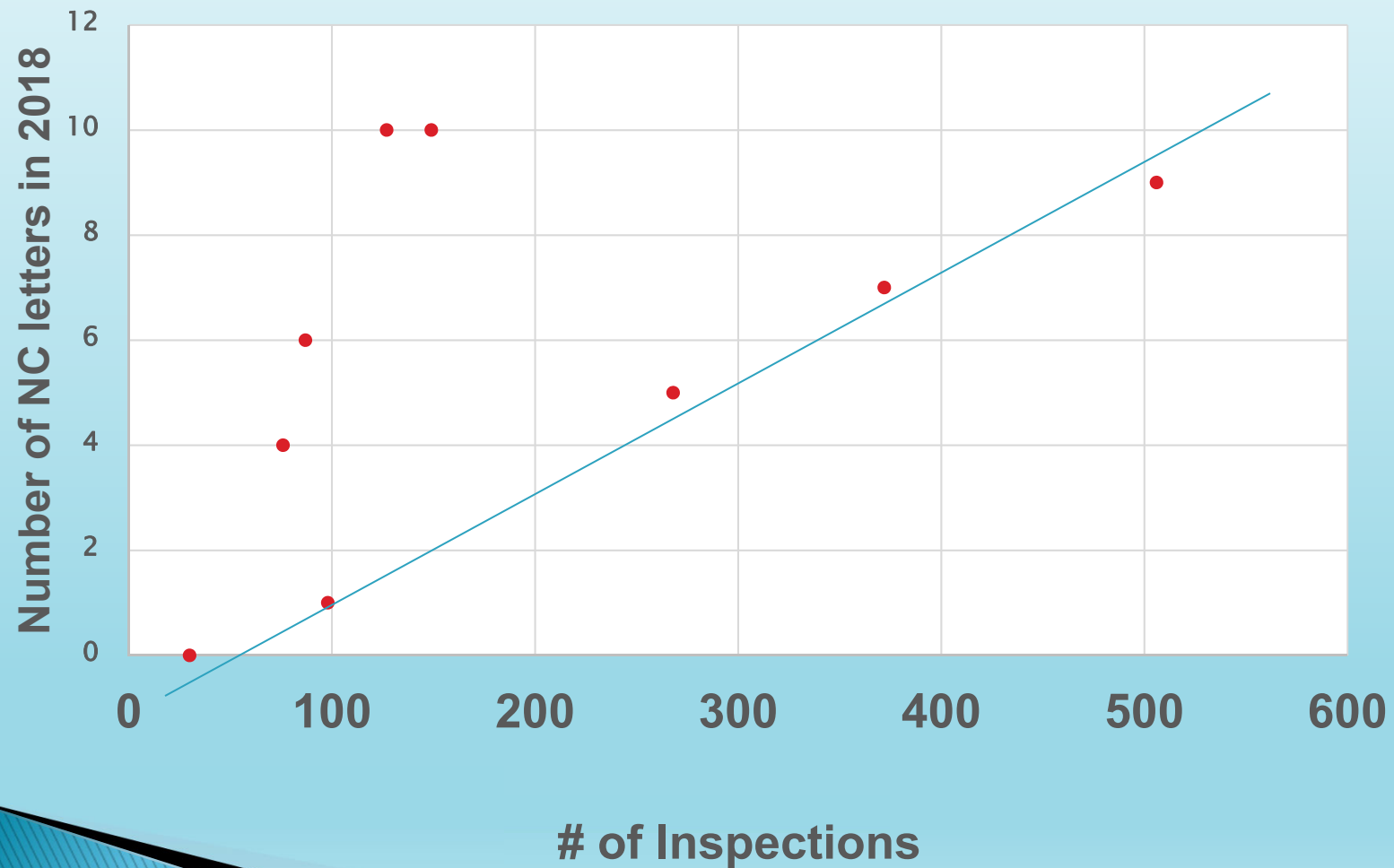


# 2018 NC Letter Percentage



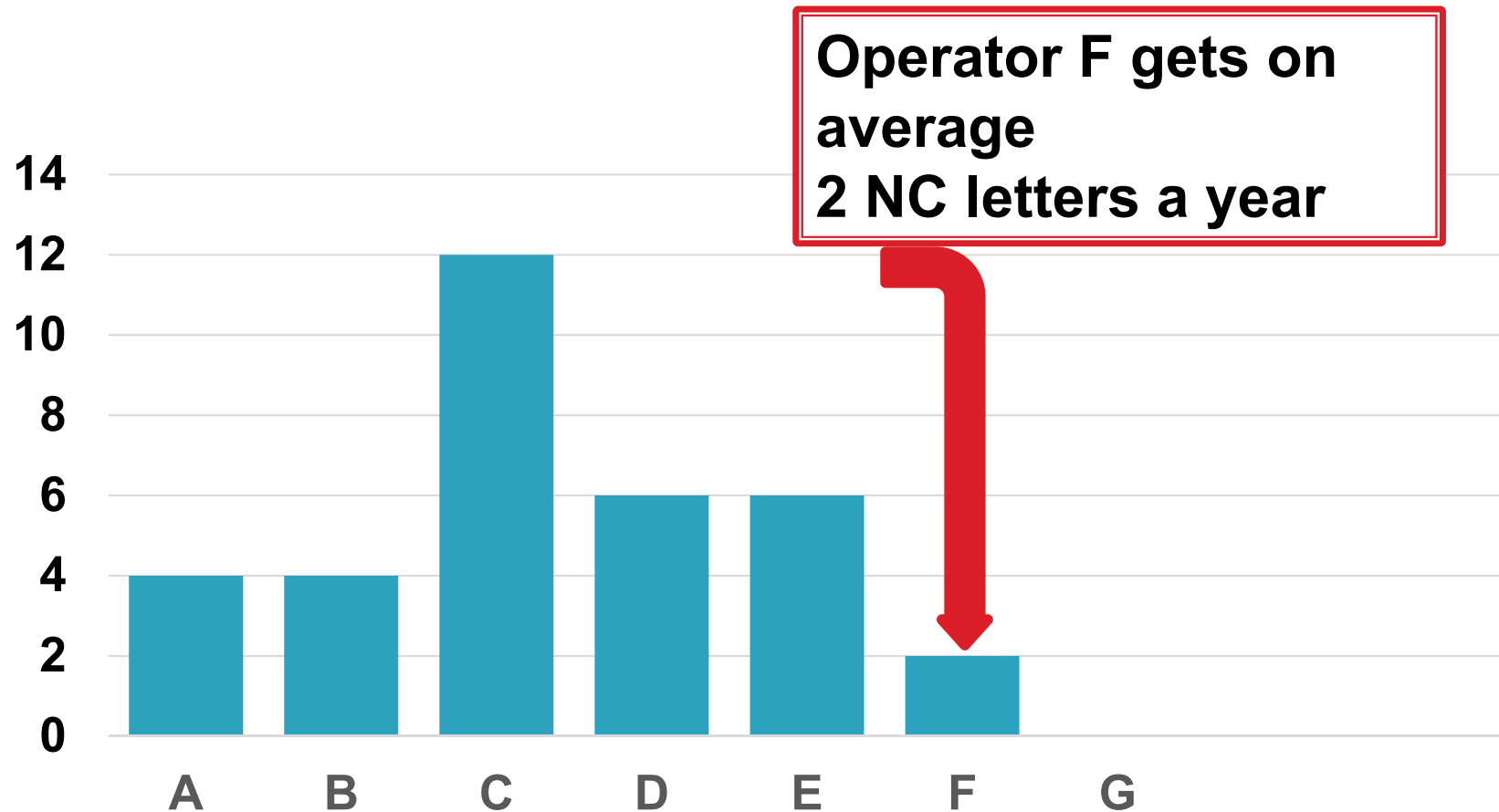


# # of NC's vs Inspections in 2018

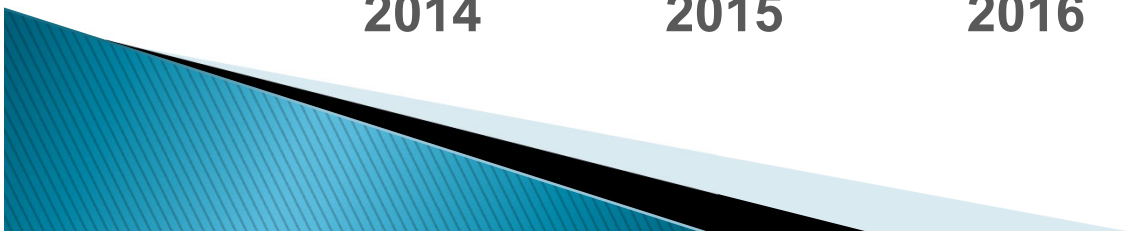
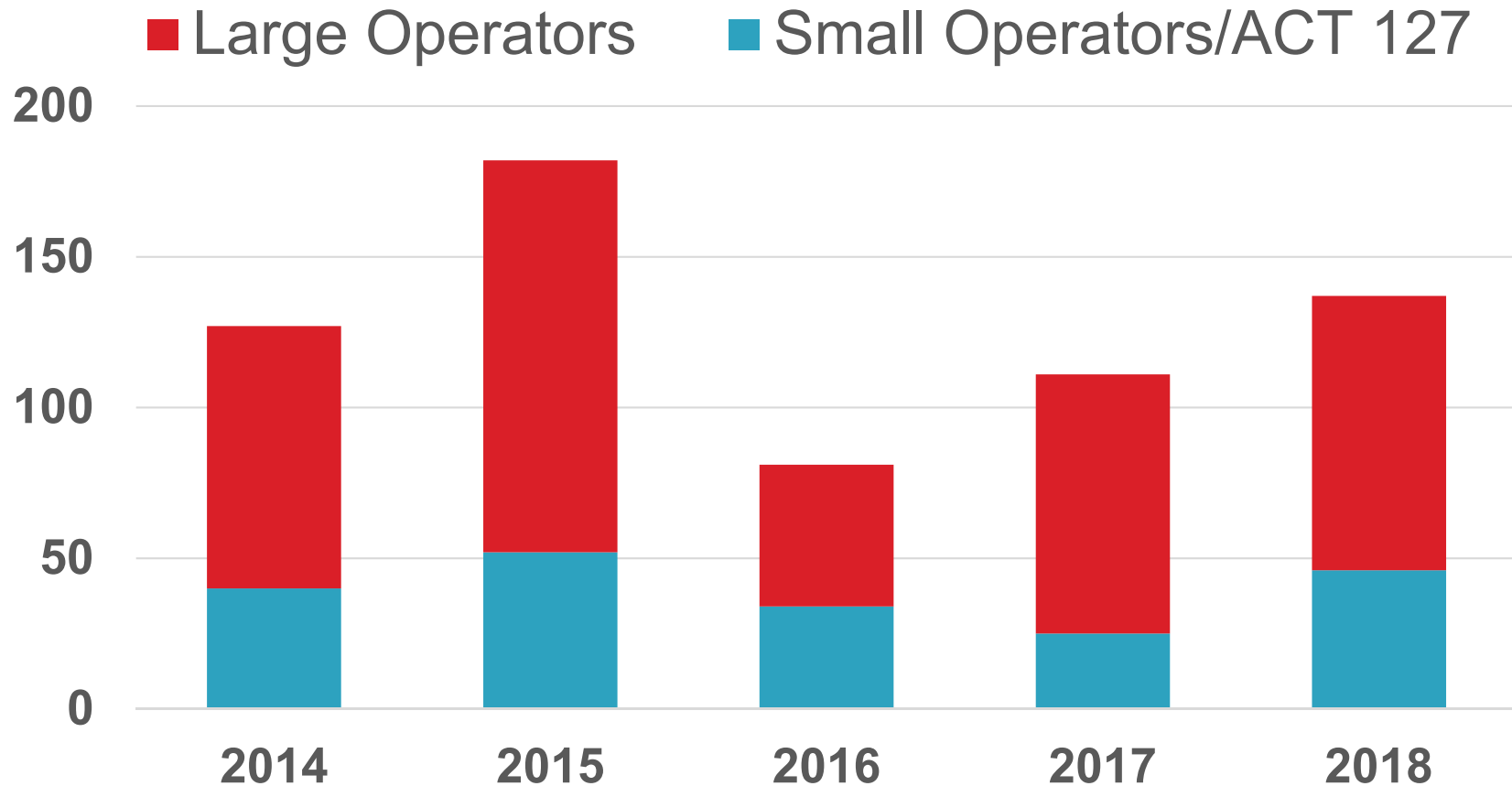


# Number of NC Letters

## 3-year Average 2016, 2017 & 2018



# Number of Violations Found in Last Five Years



# Regulations

Within 49 CFR 192 is the requirement for Operator to:

- ▶ “prepare and follow a manual of written procedures” per 192.605(a) “Operation Maintenance & Emergencies”
- ▶ “maintain modify and follow the plans procedures and programs” per 192.13
- ▶ Other Subparts requirements for procedures: 192.614 Damage Prevention, etc.



# Where Do We Find Violations

## Part 192

- ▶ 15 (10) - violations of Subpart A – General
- ▶ 2 - violations of Subpart C – Pipe Design
- ▶ 7 - violations of Subpart E – Welding
- ▶ 1 - violations of Subpart F – Joining of Materials
- ▶ 2 (1) - violations of Subpart I – Corrosion Control
- ▶ 47 (41) - violation of Subpart L – Operations
- ▶ 10 (10) - violation of Subpart M – Maintenance
- ▶ 5 (3) - violation of Subpart N – Operator Qualification
- ▶ 2 (7) - violations of Subpart P – DIMP



# Where Do We Find Violations

## **PA Code Chapter 59**

- ▶ 27 (18) - violations

## **Part 191 (Reporting)**

- ▶ 2 (2) - violations

## **Part 193 (LNG)**

- ▶ 1 (4) - violation

## **Part 195 (Liquids)**

- ▶ 14 (1) - violations

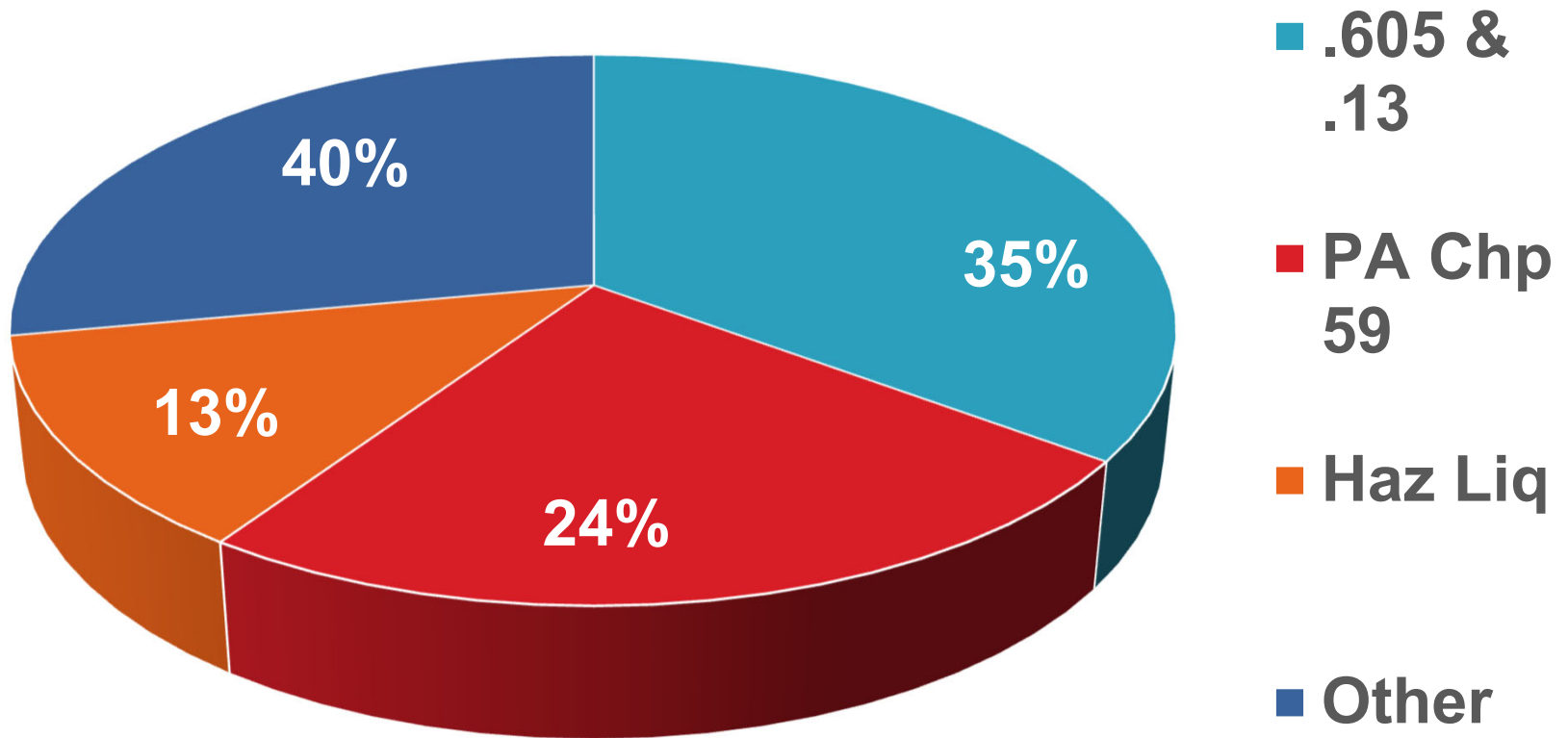
## **Other**

- ▶ 2 violations





# Most Often Cited Violations



# Example of an NC Letter

▶ DATE

▶ REFERENCE

▶ NC-xx-18

▶ IREF XXXXX

▶ Mr./Mrs. X

▶ Job Title

▶ Company Address

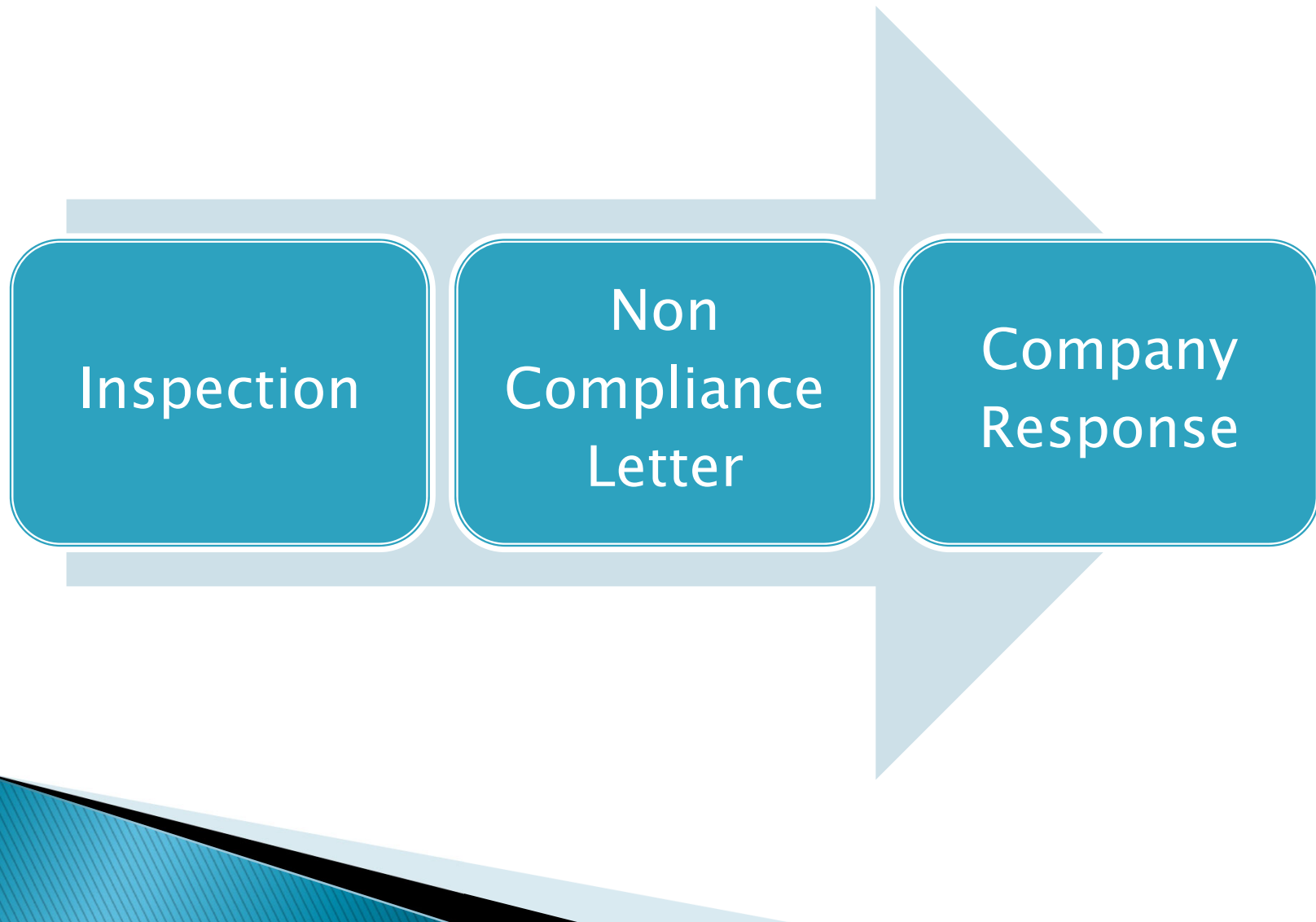


# Example of an NC Letter

- ▶ Brief description of inspection type, when and where
- ▶ Section(s) of State or Federal code which were violated
- ▶ Explanation of the inspector findings
- ▶ Corrective measures required to correct discovered violations



# Process of an NC Letter



# Close Out of an NC Letter

## NC Follow-up Inspection

Inspector(s) follow up on the stated actions or procedure changes and close out NC Letter

## Additional NC Follow-up Inspection

Usually protracted compliance with multiple follow-ups for larger more complicated NC Letters

## NC to Complaint

PUC and Operator can't agree on the violations found during the inspection and the necessary compliance actions.

# Look Familiar ????





# Summer Time Fun



# Graduations, BBQ's , Parties



# Tent Stakes – 24 to 36 inch





# When does the leak get noticed ?





# New Sidewalks



# Form Stake





Thank you for your  
attention!

Any Questions?

