

2021 Pipeline Safety Conference – Q&A Session

Question 1:

For MCA assessments, if an operator uses direct assessment for the entire line, would it be a requirement to do a dig within the MCA area?

Answer: Per the presenter, Chris Hoidal, PHMSA

If you are talking about conducting assessments outside of HCAs, e.g. 192.710, you're saying the operator is currently using direct assessment for the existing pipeline. I assume the existing pipeline is already undergoing assessments because there are portions that fall under Subpart O. Regardless, direct assessments are typically for addressing corrosion and must follow 192.923 through 192.929.

If the question is whether they need to do a dig in the MCA area to support the direct assessment method, they should. Also, any dig to support the direct assessment method would be considered a "opportunistic dig" and the operator would have to collect attribute information to support 192.607 which in turn would support 192.712 and 192.624.

Question 2:

Asks whether 52 PA code 59.11 will be brought in line with recent changes to 49 CFR 191.3, specifically the amendment of the incident definition change from \$50,000 to \$122,000?

Answer: Per Robert Horensky, I&E Safety manager

The language included in 52 PA Code 59.11 is currently under review by the Commission's Law Bureau. Operators must comply with both state and federal regulations unless otherwise directed.

Please note that, per 59.33(b) "Future Federal amendments to 49 CFR Parts 191—193, 195 and 199, as amended or modified by the Federal government, shall have the effect of amending or modifying the Commission's regulations with regard to the minimum safety standards for all natural gas and hazardous liquid public utilities. The amendment or modification shall take effect 60 days after the effective date of the Federal amendment or modification, unless the Commission publishes a notice in the Pennsylvania Bulletin stating that the amendment or modification may not take effect."