Re: **Docket No. RSPA-04-16855; Notice 1**: Pipeline Safety-Standards for Direct Assessment of Gas and Hazardous Liquid Pipelines

The Pipeline Safety Trust appreciates this opportunity to comment on the proposed standards for Direct Assessment (DA) of Gas and Hazardous Liquid Pipelines. We also appreciate RSPA’s past and ongoing efforts to clearly define what Direct Assessment is, and where it is appropriate to use. More research and verification of Direct Assessment methods are needed, so we hope that RSPA will continue to make this a priority.

As with all of the possible integrity management evaluation methods they are only as good as the knowledge, plans, implementation, and adaptive management of the operators using them. We ask that the Office of Pipeline Safety (OPS) clearly implement a program to evaluate and report to the public on how well companies are choosing the correct testing method for the varying conditions of different pipeline segments. Choosing incorrect methods is as bad, or possibly even worse, than choosing no method at all. We agree that Direct Assessment as defined within these standards is a valuable tool for assessing the integrity of certain pipelines in certain conditions, but would like OPS to pay close attention to whether it is being used in those circumstances and not being used where other types of testing would be more effective.

We ask that RSPA continue to research and develop DA methods for internal corrosion of natural gas transmission pipelines served by large LNG offloading facilities. Because much of the DA methods for internal corrosion of gas pipelines was developed with “dry service” in mind, the applicability of those methods in pipelines operating under wet or highly variable conditions such as those LNG facilities may introduce are not yet clearly understood. LNG gas introduction could have a serious detrimental impact on natural gas transmission pipeline internal corrosion risks and the application of DA inspection techniques may not be appropriate on such systems. For those reasons we ask that DA only be used in combination with other testing methods on natural gas transmission pipelines primarily served by LNG offloading facilities until the reliability of DA for such variable conditions is clarified.

We appreciate that this proposed rule gives direction for companies to allow for the extension of Direct Assessment to areas outside of High Consequence areas. One of the serious weaknesses of the Pipeline Safety Act of 2002 was that testing of pipelines was
only required in high consequence areas, which make up only a small fraction of pipelines nationwide. This shortcoming allows pipelines to continue to go untested in areas that could seriously impact public safety and the environment, such as the area where the El Paso pipeline exploded killing 12 people along the Pecos River in New Mexico. Providing direction for those operators who choose to test pipelines outside of high consequence areas is a good first step, as we await mandatory testing requirements for all pipelines hopefully in the near future.

Distribution pipelines continue to be the source of the majority of deaths and injuries within the pipeline system. We disagree with the assessment by some distribution pipeline operators that Congressional intent has already been met by the previous DA rules for gas transmission pipelines. Congress did not limit its request for Direct Assessment methods to only transmission lines, and DA methods appear to be a promising way to get at some of the corrosion problems that can affect ferrous distribution pipelines. Continued development of DA methods for distribution pipelines is needed to ensure that these methods, currently developed mainly for transmission pipelines, apply adequately to distribution pipelines and don’t undermine other valid methods that operators may already be using. It is not clear that the current DA methods apply perfectly to distribution pipelines, so we encourage RSPA to invest in research to perfect a DA method, along with other methods, for the evaluation of distribution pipelines as soon as possible.

We strongly agree with the finding that DA methods are not appropriate for internal corrosion testing of hazardous liquid pipelines. We also agree with RSPA’s finding that this proposed rule is not unduly burdensome to the industry since this new rule would be voluntary in many instances, and because affected operators are already required to be undertaking some method of pipeline integrity testing under previous rules. We have continually heard from the industry that responsible operators are already doing what they can to ensure the integrity of their pipelines, so these new rules should only serve to clarify accepted methods and not provide a burden to responsible operators.

Thank you for this opportunity to comment, and we hope you will consider our comments in your final rules.

Sincerely,

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