



# Pipeline Safety Trust Conference

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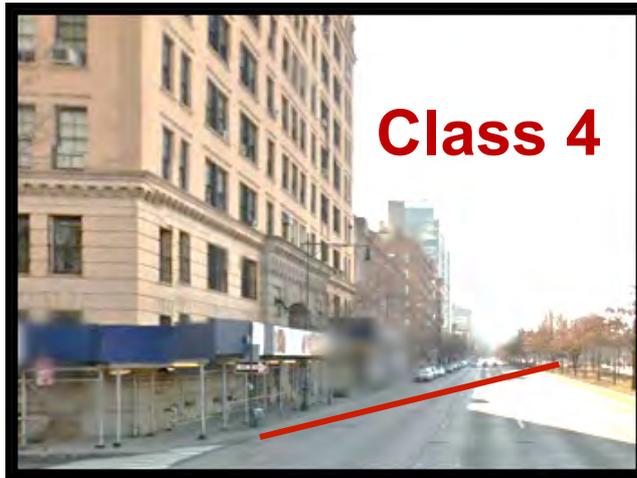
# Class Location History

- **Part of original code (49 CFR Part 192) release in 1970**
- **Prior to pipeline safety regulations in 1970, class location concept was first developed by ASME and incorporated into B31.8 (1968)**
- **Class Location has been an integral part of the pipeline design standard for almost five decades**



# Class Location Examples

## Class Locations 1 to 4



# Class Location Review

- **2011 - ANPRM – strengthening/extension of Integrity Management rules beyond current HCAs**
- **2013 - Notice of Inquiry – Application of IM beyond HCAs to mitigate class location requirements**
- **2014 - Class Location Public Workshop**
- **2016 - Class Location Report to Congress**
- **2018 - ANPRM – Class Locations (Ongoing Review)**



# Class Location Review

- **2012 PHMSA Reauthorization Section 5(a):**
  - Evaluate and report if Integrity Management (IM) requirements (or elements thereof) should be **extended beyond current HCAs**
    - Completed evaluation and prepared NPRM proposing expanded application
  - Evaluate and report if IM requirements mitigate the need for Class Location requirements



# Background

- **ANPRM issued for comments on July 31, 2018**
- **Closed for comments on October 1, 2018**
- **Docket PHMSA-2017-0151**
  - <https://www.regulations.gov/>
- **Seeking public comment on:**
  - **Existing class location requirements for gas transmission pipelines.**
  - **Actions operators must take following class location changes due to population growth around pipelines**
- **ANPRM posed 10 broad questions on class locations.**

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# 2018 ANPRM Questions

- **Q1** – When the population increases, allow pipe integrity upgrades from Class 1 to Class 3 locations by methods other than pipe replacement or special permits?
- **Q2** – Allow the option of performing certain IM measures in lieu of the existing measures when class locations change from Class 1 to Class 3 due to population growth within the sliding mile?
- **Q3** – Allow the option of performing certain IM measures in lieu of the existing measures when class locations change due to additional structures being built outside of clustered areas within the sliding mile?

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# 2018 ANPRM Questions

- **Q4** – If performance of certain IM measures in lieu of pipe replacement is allowed, should some sort of “fitness for service” standard determine which pipelines are eligible?
- **Q5** – Should operators be required to have traceable, verifiable, and complete (TVC) records as a prerequisite for performing IM measures on segments instead of replacing pipe when class locations change?
- **Q6** - Should PHMSA incorporate its special permit conditions regarding class location changes into the regulations, and would this incorporation satisfy the need for alternative approaches?



# 2018 ANPRM Questions

- **Q7** – For all new and replaced pipelines, to what extent are operators consulting growth and development plans to avoid potentially costly pipe change-outs in the future?
- **Q8** – By size range ( $>24$ ,  $16 - 24$ ,  $<16$ ), what is the amount of pipeline mileage being replaced per year due to class location changes for pipelines?



# 2018 ANPRM Questions

- **Q9** – Should any additional pipeline safety equipment, P&MM, or prescribed standard pipeline predicted failure pressures more conservative than in the IM regulations be required if operators do not replace pipe when class locations change due to population growth and perform IM measures instead?
- **Q10** – Should there be any maximum diameter, pressure, or potential impact radius (PIR) limits that should disallow operators from using IM principles in lieu of the existing requirements when class locations change?

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# Questions?

# Thank You

