Pipeline Safety TRUST

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The Pipeline Safety Trust, first and foremost, fully supports PHMSA finalization of this gas safety rule. The investigation into PG&E Line 132's failure in San Bruno 12 years ago made clear the need for several critical improvements in the pipeline safety regulations. This rule, while not perfect, makes some progress to address that need. There are several areas where this rule does not go far enough, or where it neglects to include a topic that is critical to protecting the public, like requiring the installation of automatic and remote-control valves in high consequence areas or setting leak detection standards. We urge PHMSA to address these safety improvements as soon as possible.

Risk Assessment

In this rule, PHMSA has added a list of prescribed preventive and mitigative measures that an operator must consider in its risk assessment. We strongly support the inclusion of these items to provide additional guidance to operators about their risk assessments and to improve the quality of those assessments.

This proposal applies only to those segments subject to integrity management rules, but it indicates that PHMSA is increasingly concerned about the quality of the risk assessments being performed by operators. The rule adds a number of clarifications to specify certain pipeline attributes, interactive threats, information, records and data analysis that PHMSA believes need to be a part of these risk assessments. We support these changes, since these clarifications and specifications will improve the quality of these assessments that are the foundation of each operator's integrity management program, and they will allow PHMSA to better enforce these expectations when they determine that operators are not complying. However, we believe these clarifications do not go nearly far enough to improve on the quality of risk assessments performed in operator integrity management programs.

Perhaps of primary concern to the Trust and the public is that we have no way of knowing what these risk assessments look like, whether they are of any value, or whether they work properly to identify the highest risks to a given pipe segment or system. They are kept by the operator, and are not made public even following an incident that lays bare the failures of the analysis. The public never knows whether or how PHMSA inspects them, whether they have ever been back-tested following an incident, or whether they provide only a facade of meaningless math behind which operators may conceal serious data gaps, modeling weaknesses and, most importantly, weaknesses and errors in the safety programs that are founded on these analyses.

Corrosion Control

Corrosion failures are too common and are completely within an operator's control. When a corrosion failure occurs, it means there has been operational and/or maintenance failures on the part of the operator. The vast number of corrosion-caused failures should give us all pause when operators ask us to trust them to know the best way to maintain their systems and that prescriptive regulations are unnecessary.

This new rule includes several measures intended to reduce internal corrosion incidents. First, it requires operators to monitor for contaminants that will hasten pipeline corrosion such as water and H_2S. Second, the rule requires operators to regularly review their corrosion mitigation and monitoring program. We strongly support this proposal, as it provides an enforceable mechanism on corrosion failures.

Integrity Management

The new rule strengthens Integrity Management requirements. It is important to remember that operators are only required to implement Integrity Management on pipelines that are within or could affect High Consequence Areas. We believe it is very clear that an operator's information-gathering and assessment obligations under integrity management far exceed the obligations with respect to pipes that are not within high consequence areas. The specific knowledge gathered, retained, and integrated into threat identification, and risk and integrity assessment decisions are fundamental to the integrity management risk-based program.

The Pipeline Safety Trust believes that gathering, record keeping, and data integration aspects of integrity management should be included in all operator's everyday management and not limited to pipelines in narrowly defined high consequence areas.