Pipeline Safety TRUST

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Guide to Public Comment: PHMSA's Proposed Information Collection on Hydrogen Blending in Gas Systems

I. Purpose

This document, prepared by the Pipeline Safety Trust (PST),[1] serves as a guide for members of the public, organizations, and coalitions to comment on the Pipeline and Hazardous Materials Safety Administration (PHMSA) public docket for information collection from operators on hydrogen blending activities on gas systems. Public comment is incredibly important as it will help inform PHMSA's information collection efforts. Currently, there is little known about the number of hydrogen blending projects taking place across the country or the levels of hydrogen blending which is occurring. Given hydrogen has qualities different from methane gas that pose unique challenges and safety risks, and current gas systems were largely designed and constructed to transport methane, collecting this information from operators will help inform future research and decision-making and improve transparency and inform future rulemaking around this practice. Further, as alternative energy sources such as hydrogen are explored by operators attempt to lower greenhouse gas emissions, PST would like to ensure operators are not putting the public in harm's way and that the regulator has the information necessary to regulate this practice.

Below is a guide on commenting on this public docket and suggestions from PST on strengthening this information collection. For more information about hydrogen and pipeline safety, see the resources below:

- Report on Hydrogen: Summary for Policymakers
- Full Report on Hydrogen Pipelines
- PST Guide to Pipeline Safety Rulemaking

II. How to Submit a Comment

Online comments may be submitted to PHMSA via Regulations.gov. Once on the docket page, comments may be submitted by clicking the blue "Comment" button. You will be prompted to enter your comment manually or can choose to upload a file version of your comment.

Best practices for submitting comments are to keep them short, plainly worded, and clearly explain why this information collection is important for PHMSA to begin. Be sure to reference docket number *PHMSA-2022-0085* in your comment and submit it as soon as possible. The deadline for this comment period is June 24, 2024.

[1] The Pipeline Safety Trust is the only national non-profit organization that focuses on pipeline safety. We pursue our mission through education and advocacy, increasing access to information, and building partnerships with residents, safety advocates, government, and industry to promote safe communities and a healthy environment.

III. Comment Suggestions

The Pipeline Safety Trust strongly supports PHMSA's proposed collection of hydrogen blending activities in gas systems. We believe the following additions to the proposal would further public awareness and safety around this activity.

A. PHMSA should require more granularity and more specificity about rates of hydrogen blending. The current categories proposed by PHMSA for reporting blending are 0-5%, 5-20%, and 20% and greater. There is little evidence that hydrogen blending above 30% is likely; and, PST believes having more granular categories at the lower end would be more helpful. We suggest the following categories: 0-5%, 5-10%, 10-15%, and 15% and greater. This specificity would increase transparency for members of the public and capture real-life scenarios. Additionally, PHMSA should make clear that operators report the highest potential presence of hydrogen intended to be blended rather than an average.

B. PHMSA should ensure public access to the information collected. Is it critical that PHMSA use this information collection to increase transparency to members of the public, who are extremely interested in the potential blending of hydrogen near them. PST proposes that PHMSA post the 'commodity type' information on the public version of the National Pipeline Mapping System (NPMS). Most critically, this should include the percentage of hydrogen blended; not simply that blending is taking place.

C. PHMSA should expand its information collection to include other methane blends. Given the safety and transparency concerns of blending other fuel sources with methane, PST would also like to see similar information collected for those blends. For example, some operators engage in propane blending for peak shaving purposes, but operators are not required to share that information with PHMSA. This can be of extreme consequence: In 2022, an Indiana operator improperly mixed propane into its gas system and caused over 100 emergency calls about the issue and 4 hospitalizations.[2]

D. PHMSA should take steps to address scientific and regulatory gaps associated with hydrogen blending. Pipeline Safety Trust has serious concerns about the existing scientific and regulatory gaps given recent hydrogen blending proposals. Right now, operators are not required to notify PHMSA about hydrogen and gas blending projects, or safety measures operators are using. Hydrogen has unique properties that may pose concerns when added to systems not designed for it. To ensure public safety, PHMSA must fund research and development into assessing the compatibility of hydrogen blends in transmission pipeline systems designed for methane, safety implications of blending hydrogen at high percentages in distribution systems, prevention of pipeline embrittlement, hydrogen leakage, and leak detection technologies. PST hopes that PHMSA will use this new information to inform future safety regulations for hydrogen and hydrogen/methane blended pipelines.

E. <u>Additional comments:</u>

a. Unrelated to hydrogen blending, PHMSA is also requesting comments on collecting information on operator utilization of rupture mitigation valves (RMVs) on gas

[2] Louisville Public Media (2023) "CenterPoint Admits Fault for December Carbon Monoxide issues in Southern Indiana," https://www.lpm.org/news/2023-02-08/centerpoint-admits-fault-for-december-carbon-monoxide-issues-in-southern-indiana.

transmission, gathering, hazardous liquid, and carbon dioxide pipelines. RMVs are automatic or remote shut-off valves that can be used by operators to minimize the volume of a release. While collecting this information will improve PHMSA's understanding of the operator's use of this technology, we suggest that PHMSA also require operators to report estimated shut-off times in or near high consequence areas (i.e., densely populated areas, ecologically sensitive areas) on pipes that do not have rupture mitigation valves.

We appreciate your interest in submitting a comment on this important safety issue. If you have any questions about this guide, please contact Hailey Duncan, Policy Advisor, at hailey@pstrust.org to discuss further.