

2016 Gas Safety Conference Compliance Review

**Pennsylvania PUC-Gas Safety
September 7, 2016**

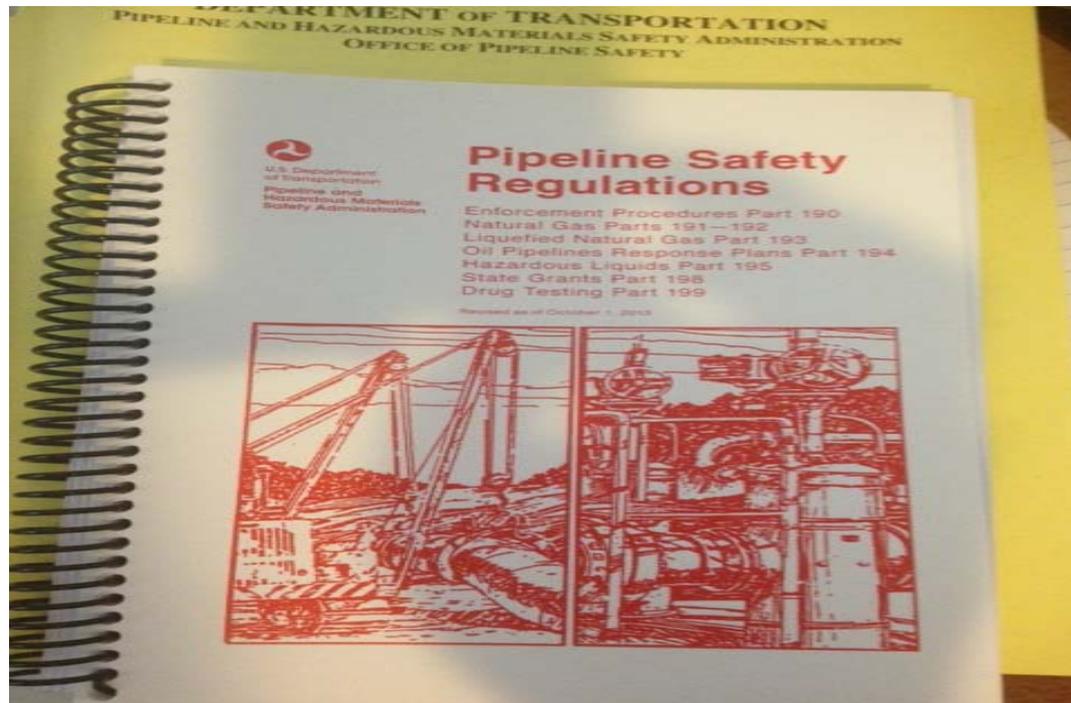
Bob Biggard and Mike Chilek

Regulations:

- ▶ Primary job of Gas Safety is to enforce:
 - 49 CFR 191, 192 and 193
 - State regulations in 52 PA Code
 - What do regulations require that the operator did not do?
 - ▶ Within 49 CFR 192 is the requirement for Operators to “prepare and follow a manual of written procedures” per 192.605(a) “Operation Maintenance & Emergencies”
 - ▶ and “maintain modify and follow the plans procedures and programs” per 192.13 –
 - ▶ Other Subparts requirements for procedures..192.614 Damage Prevention etc.
 - ▶ Procedures: Are they correct? Were they followed?
 - ▶ 192.7 incorporates by reference in whole and in part: ATSM, ASME, API, NFPA, PPI, NACE, GTI etc.
- 

Says who? US DOT-PHMSA

- ▶ 192.1 (a) ...prescribes the minimum safety requirements for pipeline facilities and transportation of natural gas



Non-Compliance Letters-Why?

- ▶ Inform operators of a non-compliance with state or federal code
- ▶ Creates a record of the non-compliance
- ▶ Expected that Operators apply required corrections across all operating areas and ensure it is not repeated-now or later

So, take the information from today's presentation and apply to your system proactively: These are the things we are looking for!!



Operators...

- ▶ 49 CFR 192- Effective 1971
 - Operators had 45 years to adopt and comply to minimum standards...with some changes and additions over the years
 - Operators get to write their own procedures to comply with and exceed the code

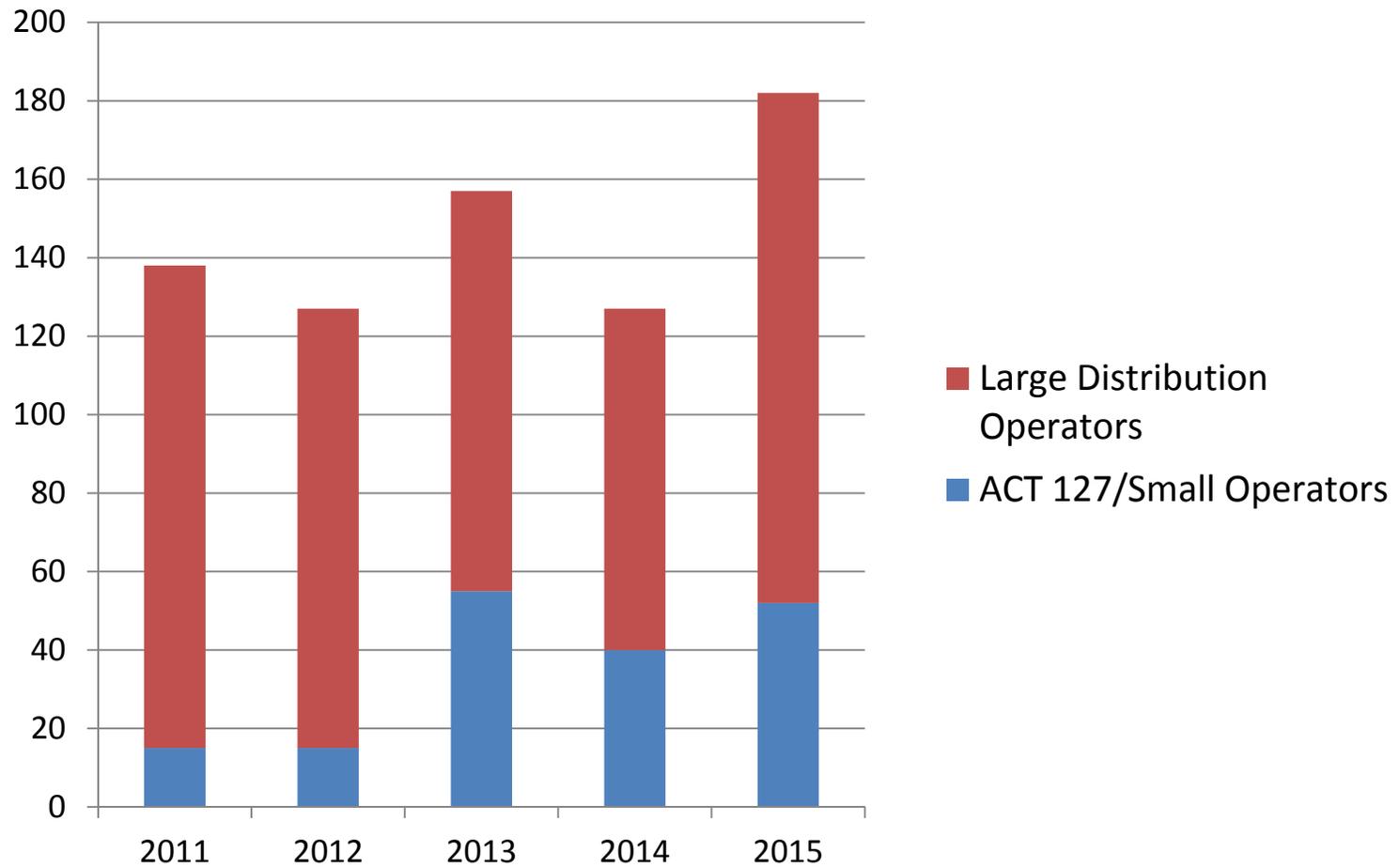
So, what are we finding?



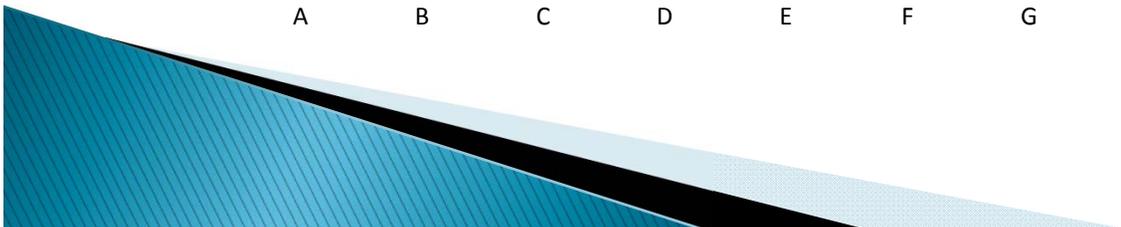
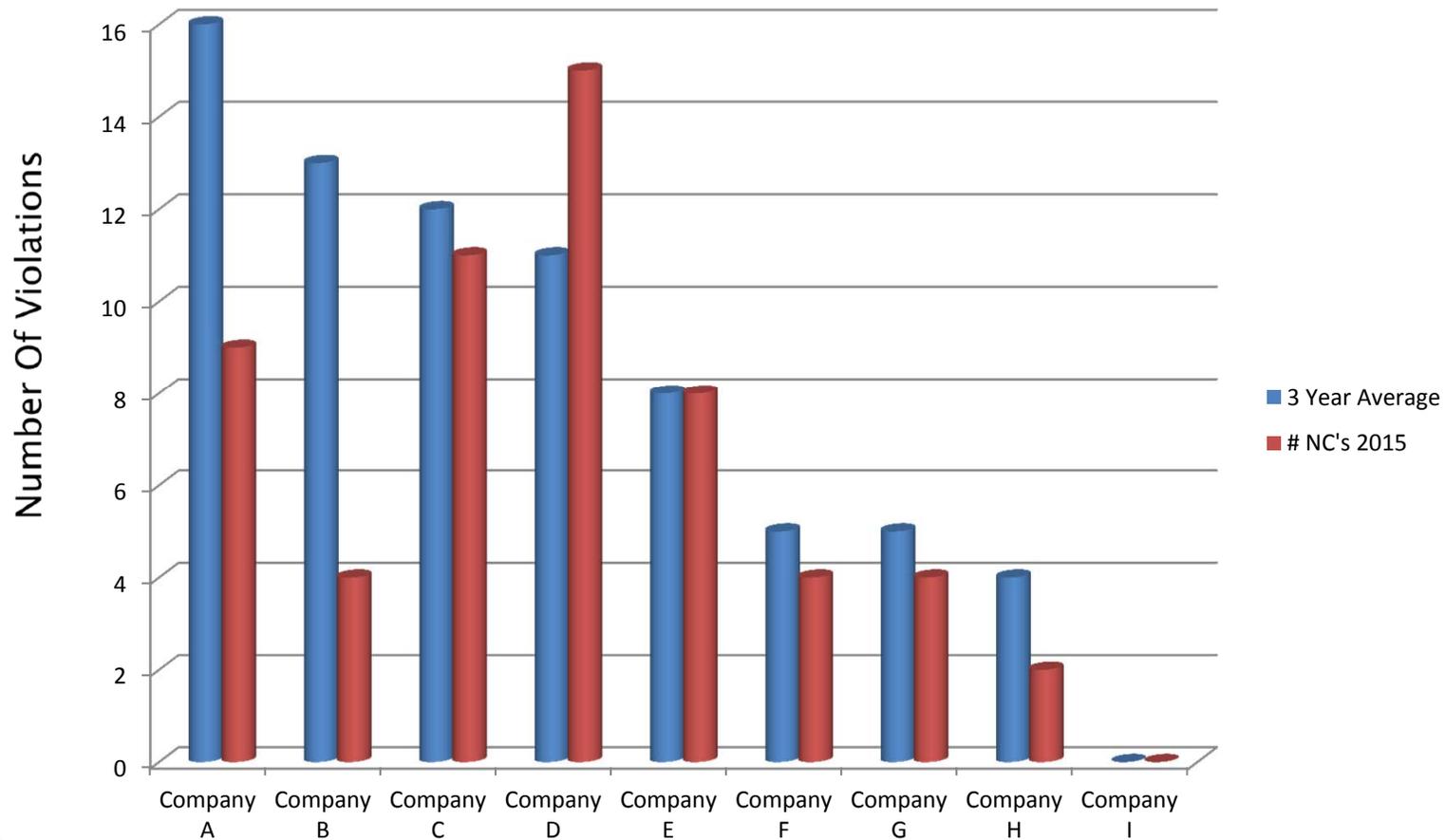
2015 Inspection Data:

- 1,475 Inspection days: Gas Safety Engineers get one inspection day per day in the field, even if we do more than one inspection that day
- 73 Non-compliance letters in 2015
- 182 violations (state and federal) within those non-compliance letters
- 2,401 total inspections in 2015

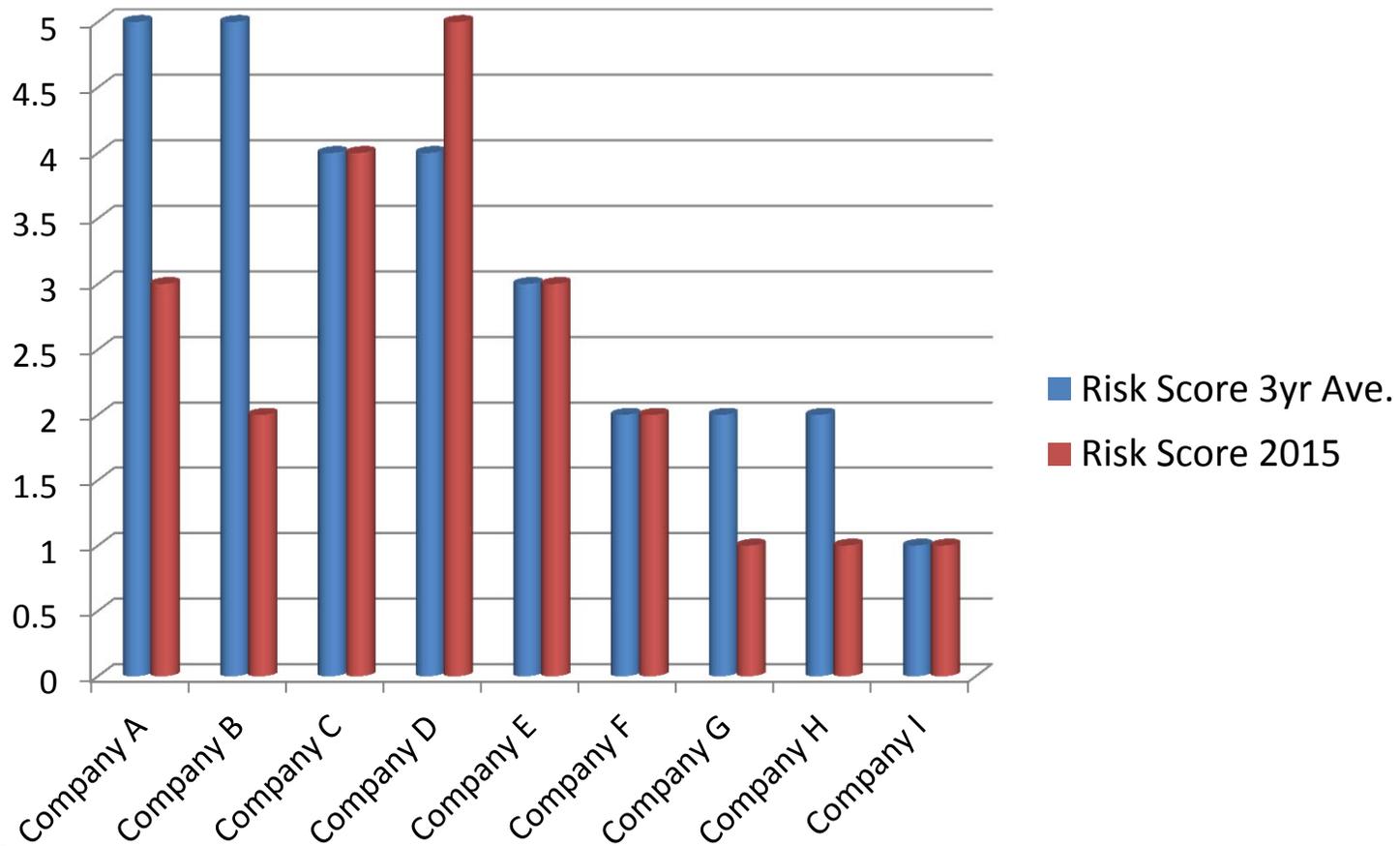
Number Of Violations Found In The Past Five Years



COMPARISON OF 2015 VIOLATIONS VS. THREE YEAR AVERAGE



Non Compliance Risk Score 3 Year Ave. vs. 2015 Risk Score



Where do we find Violations

20 violations were found of PA Code Chapter 59

14 violations of Subpart A - General

1 violation of Subpart C – Pipe Design

9 violations of Subpart D – Design of Pipeline Components

4 violations of Subpart E – Welding of Steel Pipelines

1 violation of Subpart F – Joining of Materials other than by Welding

15 violations of Subpart G – General Construction Requirements for
Transmission Lines and Mains

24 violations of Subpart I – Requirements for Corrosion Control



Where do we find Violations

- ▶ 10 violations of Subpart J – Testing Requirements
- ▶ 2 violations of Subpart K - Uprating
- ▶ 55 violations of Subpart L - Operations
- ▶ 11 violations of Subpart M – Maintenance
- ▶ 8 violation of Subpart O – Gas Transmission Pipeline Integrity Management
- ▶ 4 violations of Subpart P – Gas Distribution Pipeline Integrity Management (IM)
- ▶ 4 violations of Part 193 (LNG)



Facility Damages resulting in Violations

- ▶ 15 – NC letters based on violations 192.614



Facility Damages resulting in Violations

- ▶ 15 – NC letters based on violations 192.614
- ▶ 2 – mappings issues



Facility Damages resulting in Violations

- ▶ 15 – NC letters based on violations 192.614
- ▶ 2 – mappings issues
- ▶ 2 – inaccurate marks



Facility Damages resulting in Violations

- ▶ 15 – NC letters based on violations 192.614
- ▶ 2 – mappings issues
- ▶ 2 – inaccurate marks
- ▶ 5 – no mark or incomplete marks



Facility Damages resulting in Violations

- ▶ 15 – NC letters based on violations 192.614
- ▶ 2 – mappings issues
- ▶ 2 – inaccurate marks
- ▶ 5 – no mark or incomplete marks
- ▶ 6 – contractor/company self inflicted



Facility Damages resulting in Violations

- ▶ 15 – NC letters based on violations 192.614
- ▶ 2 – mappings issues
- ▶ 2 – inaccurate marks
- ▶ 5 – no mark or incomplete marks
- ▶ 6 – contractor/company self inflicted



Facility Damages resulting in Violations



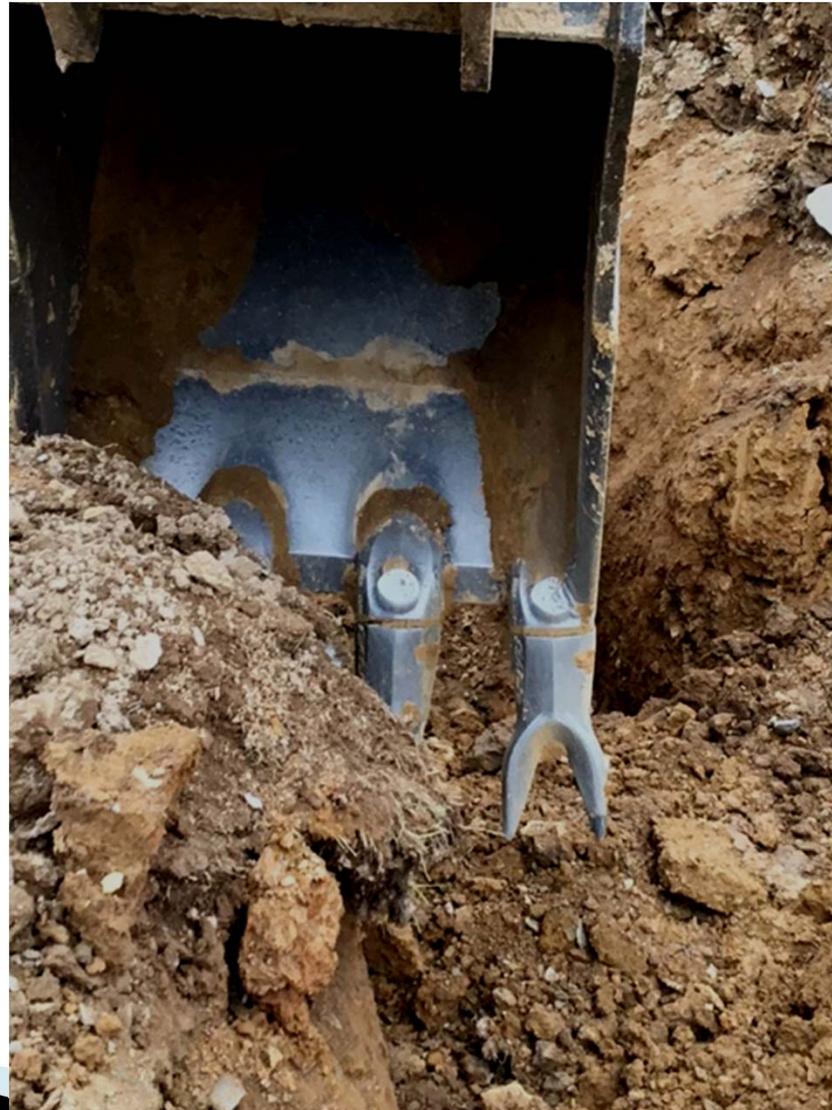
Facility Damages resulting in Violations



Facility Damages resulting in Violations



Facility Damages resulting in Violations



Example of an NC Letter

- ▶ DATE

- ▶ REFERENCE

- ▶ NC-xx-15

- ▶ IREF XXXX

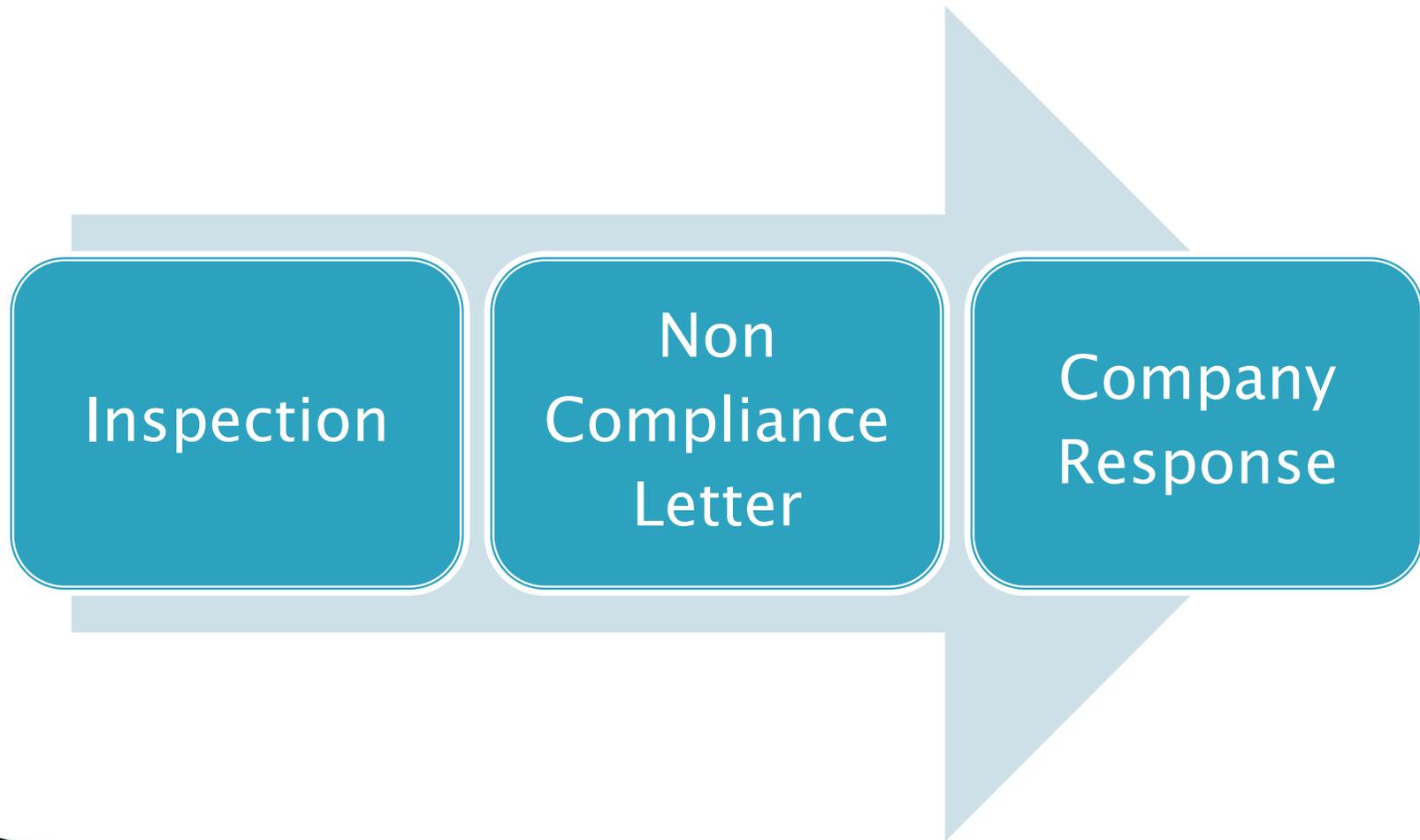
- ▶ Mr./Mrs. X

- ▶ Job Title

- ▶ Company Address



Process of an NC Letter



Close Out of an NC Letter

NC Follow-up Inspection

Inspector(s) follow up on the stated actions or procedure changes and close out NC Letter

Additional NC Follow-up Inspection

Usually protracted compliance with multiple follow-ups for larger more complicated NC Letters

NC to Complaint

PUC and Gas Company can't agree on the issues found during the inspection and need for company to take action.



Letter NC-xx-15:

Started as a Records Inspection

Violations of Subparts:

C – Pipe Design

E – Welding of Steel in Pipelines

I – Requirements for Corrosion Control

L - Operations



Thank You

