



 Iowa
2022 Seminar



PART 191 INCIDENT & SAFETY RELATED CONDITION REPORTING FOR NATURAL GAS PIPELINES

Hilton Garden Inn West Des Moines
West Des Moines, IA



 **Definitions 191.3** 

Incident means any of the following events:

1. An event that involves a release of gas from a pipeline, gas from an underground natural gas storage facility (UNGSF), liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences:
 - i. A death, or personal injury necessitating in-patient hospitalization;

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Definitions 191.3

Incident means any of the following events:

1. An event that involves a release of gas from a pipeline, gas from an underground natural gas storage facility (UNGSF), liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences: *-Continued-*
 - ii. Estimated property damage of \$122,000 or more, including loss to the operator and others, or both, but excluding the cost of gas lost. For adjustments for inflation observed in calendar year 2021 onwards, changes to the reporting threshold will be posted on PHMSA's website. These changes will be determined in accordance with the procedures in appendix A to part 191.
 - iii. Unintentional estimated gas loss of three million cubic feet or more.



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Definitions 191.3

- "Incident" means any of the following events: *-Continued-*

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Incident (§191.3)

(2) An event that results in an emergency shutdown of an LNG facility or a UNGSF. Activation of an emergency shutdown system for reasons other than an actual emergency within the facility does not constitute an incident.



Incident (§191.3)

(3) An event that is significant in the judgment of the operator, even though it did not meet the criteria of paragraph (1) or (2) of this definition.



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Significant Events

The operator should define these significant events:

- Lower thresholds for property loss
- Emergency response
- Media
- Loss of Customers

Intrastate operator's criteria may be guided by state regulations



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Appendix A to Part 191 - Procedure for Determining Reporting Threshold

- Each year after calendar year 2021, the Administrator will publish a notice on PHMSA's website announcing the updates to the property damage threshold criterion that will take effect on July 1 of that year and will remain in effect until the June 30 of the next year. The property damage threshold used in the definition of an Incident at § 191.3 shall be determined in accordance with the following formula:

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Appendix A to Part 191 - Procedure for Determining Reporting Threshold

$$T_r = T_p \times \frac{CPI_r}{CPI_p}$$

- **Tr** is the revised damage threshold,
- **Tp** is the previous damage threshold, CPIr is the average Consumer Price Indices for all Urban Consumers (CPI-U) published by the Bureau of Labor Statistics each month during the most recent complete calendar year, and
- **CPIp** is the average CPI-U for the calendar year used to establish the previous property damage criteria.



Reportable Incidents

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What should an operator do when a reportable incident as defined in § 191.3 occurs?

The Operator should:

- Activate the Emergency Response Plan
- Call the NRC (National Response Center) at 1-800-424-8802 at the earliest practicable moment following discover, **but no later than one hour after confirmed discovery.** (§191.5)
 - Online Reporting No Longer Available!



Initial Telephonic Notice to NRC

- Must include the following information:
- Names of operator and *person* making report & their telephone numbers.
- The location of the incident.
- The time of the incident.
- The number of fatalities and personal injuries, if any.
- All other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages.

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48-hour Revision or confirmation

- Within 48 hours after the confirmed discovery of an incident, to the extent practicable, an operator must revise or confirm its initial telephonic notice with an estimate of the amount of product released, an estimate of the number of fatalities and injuries, and all other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages.
- If there are no changes or revisions to the initial report, the operator must confirm the estimates in its initial report.



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Post-Incident Reporting

Complete an incident form as soon as practicable, but within 30 days

<https://portal.phmsa.dot.gov/pipeline>. You will need your OPID (Operator Identification Number), Username and Password.

- §191.9 (Gas Distribution) or §191.15 (Gas Transmission and UGS)



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Post-Incident Reporting

The report should be filed electronically (§191.7) no later than 30 days after detection of an incident required to be reported under § 191.5

- PHMSA Form 7100.1 (Gas Distribution),
- DOT Form PHMSA F 7100.2 (Transmission or Gathering)
- **Note: After May 16, 2022 Changes to : Transmission or regulated onshore gathering and adds, DOT Form PHMSA F 7100.2-2 (a Reporting-regulated gathering)**
- or DOT Form PHMSA F7100.2 (Underground Natural Gas Storage)
- Additional supplemental reports should be filed, as needed
 - as soon as practicable, with a clear reference by date to the original report
- Be sure to finalize the report



Post-Incident Reporting

The report should be filed electronically (§191.7) no later than 30 days after detection of an incident required to be reported under § 191.5 (continued)

- or DOT Form PHMSA F7100.2 (Underground Natural Gas Storage)
- Additional supplemental reports should be filed, as needed
 - as soon as practicable, with a clear reference by date to the original report
- Be sure to finalize the report



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Post-Incident Reporting

What if an operator calls the NRC and discovers later that the incident is not a reportable incident?

- Make the call, even if you're not certain the call is required.
- It's better to make the call when it may not be necessary than to not make the call and determine later a notification was required.



Post-Incident Reporting

If it turns out an NRC notification was made, but wasn't required:

- No 30-day report required
- The NRC report cannot be rescinded
- Courtesy call to PHMSA or appropriate State Agency





Post-Incident Reporting

If the operator determines the incident wasn't reportable, after has called the NRC:

- The operator must send a letter requesting the incident be rescinded.
 - Provides that no 30-day written report will be sent.
- Only the operator can request a report be rescinded.



Report Submission

§191.7 If electronic reporting imposes an undue burden and hardship, the operator may submit written request for an alternative reporting method.

- The request must describe the undue burden and hardship
- PHMSA will review the request, and may authorize in writing an alternative reporting method





Report Submission

Federal reporting does not supersede State Reporting Requirements.

- The operator may still be required to file a written report with the state regulatory agency.
- Reporting to the NRC will NOT automatically send a copy to the state



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Safety-Related Conditions §191.23

Each operator shall report the existence of any of the following safety related conditions in accordance with § 191.25:



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Safety-Related Conditions §191.23

- In the case of a pipeline (other than an LNG facility) that operates at a hoop stress of 20% or more of its specified minimum yield strength, general corrosion that has reduced the wall thickness to less than that required for the maximum allowable operating pressure, and localized corrosion pitting to a degree where leakage might result.



Safety-Related Conditions §191.23

- In the case of a UNGSF, general corrosion that has reduced the wall thickness of any metal component to less than that required for the well's maximum operating pressure, or localized corrosion pitting to a degree where leakage might result.





Safety-Related Conditions §191.23

- Unintended movement or abnormal loading by environmental causes, such as an earthquake, landslide, or flood, that impairs the serviceability of a pipeline or the structural integrity or reliability of a UNGSF or LNG facility that contains, controls, or processes gas or LNG.



Safety-Related Conditions §191.23

- Any crack or other material defect that impairs the structural integrity or reliability of a UNGSF or an LNG facility that contains, controls, or processes gas or LNG.



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Safety-Related Conditions §191.23

- Any material defect or physical damage that impairs the serviceability of a pipeline that operates at a hoop stress of 20% or more of its specified minimum yield strength, or the serviceability or the structural integrity of a UNGSF.



Safety-Related Conditions §191.23

- Any malfunction or operating error that causes the pressure - plus the margin (build-up) allowed for operation of pressure limiting or control devices - to exceed either the maximum allowable operating pressure of a distribution or gathering line, the maximum well allowable operating pressure of an underground natural gas storage facility, or the maximum allowable working pressure of an LNG facility that contains or processes gas or LNG.



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Safety-Related Conditions §191.23

- A leak in a pipeline, UNGSF, or LNG facility containing or processing gas or LNG that constitutes an emergency.
- Inner tank leakage, ineffective insulation, or frost heave that impairs the structural integrity of an LNG storage tank.



Safety-Related Conditions §191.23

- Any malfunction or operating error that causes the pressure - plus the margin (build-up) allowed for operation of pressure limiting or control devices - to exceed either the maximum allowable operating pressure of a distribution or gathering line, the maximum well allowable operating pressure of an underground natural gas storage facility, or the maximum allowable working pressure of an LNG facility that contains or processes gas or LNG.



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Safety-Related Conditions §191.23

- Any safety-related condition that could lead to an imminent hazard and causes (either directly or indirectly by remedial action of the operator), for purposes other than abandonment, a 20% or more reduction in operating pressure or shutdown of operation of a pipeline, UNGSF, or an LNG facility that contains or processes gas or LNG.



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Safety-Related Conditions §191.23

- For transmission pipelines only, each exceedance of the maximum allowable operating pressure that exceeds the margin (build-up) allowed for operation of pressure-limiting or control devices as specified in the applicable requirements of §§ 192.201, 192.620(e), and 192.739. The reporting requirement of this paragraph (a)(10) is not applicable to gathering lines, distribution lines, LNG facilities, or underground natural gas storage facilities (See paragraph (a)(6) of this section).



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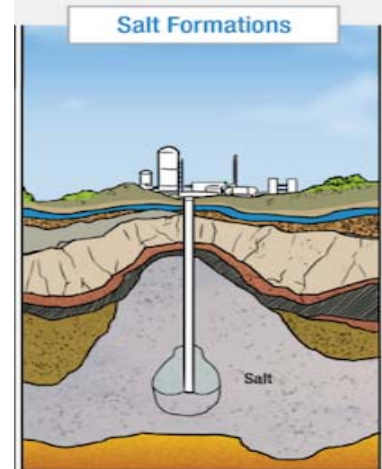
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Safety-Related Conditions §191.23

- Any malfunction or operating error that causes the pressure of a UNGSF using a salt cavern for natural gas storage to fall below its minimum allowable operating pressure, as defined by the facility's State or Federal operating permit or certificate, whichever pressure is higher.



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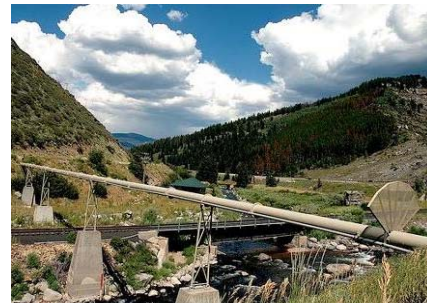
33



Safety-Related Conditions §191.23

Reports are required for conditions on a pipeline :

- within the Right-of-Way of an active railroad, paved road, street, or highway, or
- within 220 yards of a building intended for human occupancy or outdoor place of assembly



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Safety-Related Conditions §191.23

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Filing a Safety-Related Condition Report §191.25

File within 5 working days of determination

No more than 10 working days after discovery of the condition

There is no specific form

- Information Requirements are in §191.25

Email to: InformationResourcesManager@dot.gov

Or Fax to (202) 366-7128



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DETERMINE (definition)

To establish or ascertain definitely, as after:



investigation, reasoning or calculation.



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DISCOVER (definition)

To gain knowledge of (something) through observation, study, or search;

to be the first to find, learn or observe.

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DISCOVER DETERMINE WRITTEN REPORT
MON-TUE-WED-THU-FRI-SAT*SUN* MON-TUE-WED-THU-FRI-SAT*SUN* MON

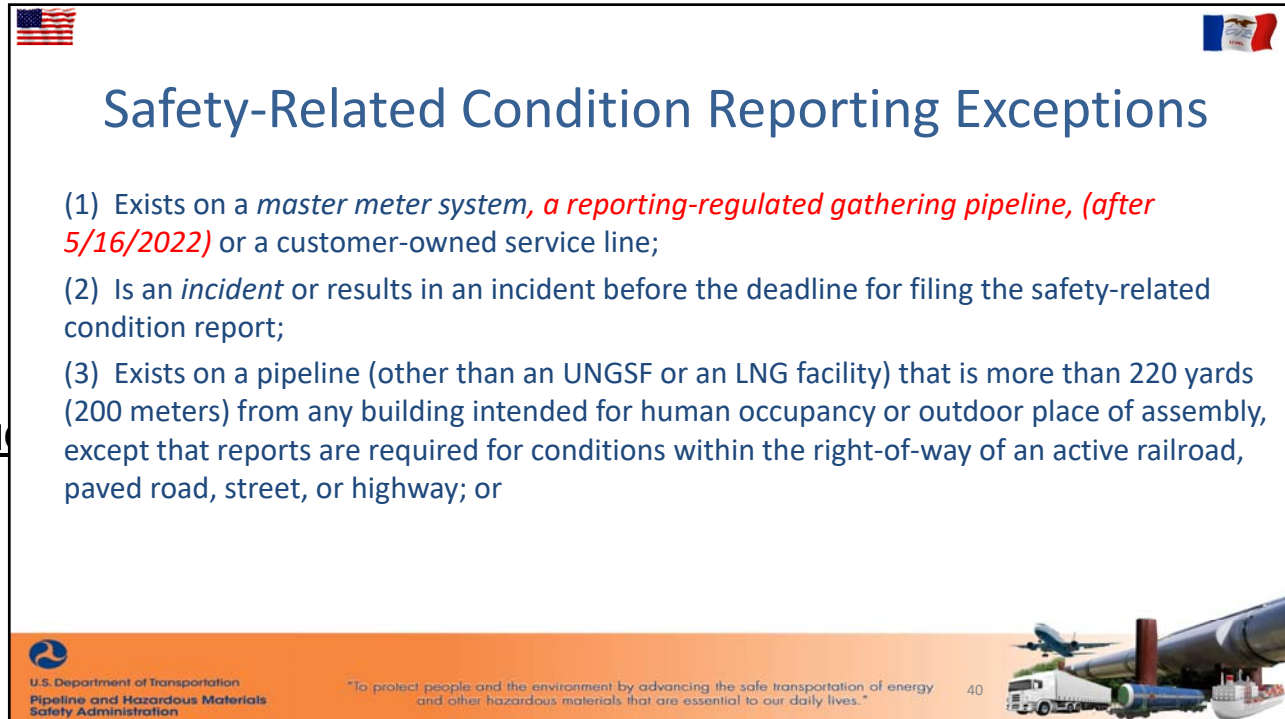
***DISCOVER**

1 2 3 4 5 6 7 8 9 10

***DETERMINE**

1 2 3 4 5

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Safety-Related Condition Reporting Exceptions

- (1) Exists on a *master meter system, a reporting-regulated gathering pipeline, (after 5/16/2022)* or a customer-owned service line;
- (2) Is an *incident* or results in an incident before the deadline for filing the safety-related condition report;
- (3) Exists on a pipeline (other than an UNGSF or an LNG facility) that is more than 220 yards (200 meters) from any building intended for human occupancy or outdoor place of assembly, except that reports are required for conditions within the right-of-way of an active railroad, paved road, street, or highway; or

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Safety-Related Condition Reporting Exceptions

(4) Is corrected by repair or replacement in accordance with applicable safety standards before the deadline for filing the safety-related condition report. Notwithstanding this exception, a report must be filed for:

- (i) Conditions on a pipeline (other than an LNG facility) that operates at a hoop stress of 20% or more of its specified minimum yield strength, where general corrosion that has reduced the wall thickness to less than that required for the maximum allowable operating pressure, and localized corrosion pitting to a degree where leakage might result., unless the condition is localized corrosion pitting on an effectively coated and cathodically protected pipeline; and



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Safety-Related Condition Reporting Exceptions

(4) Is corrected by repair or replacement in accordance with applicable safety standards before the deadline for filing the safety-related condition report. Notwithstanding this exception, a report must be filed for: (continued)

- (ii) Any condition on a transmission pipeline which causes an exceedance of the maximum allowable operating pressure that exceeds the margin (build-up) allowed for operation of pressure-limiting or control devices as specified in the applicable requirements of §§ 192.201, 192.620(e), and 192.739.

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(5) Exists on an UNGSF, where a well or wellhead is isolated, allowing the reservoir or cavern and all other components of the facility to continue to operate normally and without pressure restriction.



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Summary for Reporting Requirements

- Operators should have:
 - Written procedures
 - Forms and information available
 - Review process and work



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NOTES: