



THE LEADER IN ENERGY INFRASTRUCTURE

Compliance for Pipeline Projects





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THE **LEADER** IN ENERGY INFRASTRUCTURE

SAFETY MINUTE



CEPC Organizational Overview

- Founded in 2005, Employee Owned / Unique Company Culture
- Headquarters in **Denver, CO** with **12 offices** across the country
- **MBE Certified - National Minority Supplier Development Council (NMSDC) Corporate Plus Member**
- Staff of over 450 full-time professionals focused on Engineering, Consulting and full turnkey EPC services in the Energy Industry
- Specializing in Engineering Design, Pipeline Integrity Management, Program / Project Management and Estimating
- **ISO 9001 / 14001 Certified (project / work processes mapped)**
- Significant experience with major Utilities & Transmission / Midstream operators
- **Community Outreach Program – Campos EPC Foundation**



Campos EPC Offices





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Resources for Staying Informed





FEDERAL REGISTER

The Daily Journal of the United States Government



Website: [federalregister.gov](https://www.federalregister.gov)

The Federal Register is the official journal of the federal government of the United States that contains government agency rules, proposed rules, and public notices. PHMSA posts all notices of Special Permit Requests, Advisory Bulletins, Proposed Rules, and Final Rules.

- (N) [Pipeline Safety: Joint Meeting of the Gas and Liquid Pipeline Advisory Committees](#)
by the Pipeline and Hazardous Materials Safety Administration on 10/04/2021.



This notice announces a virtual public meeting of the Technical Pipeline Safety Standards Committee also known as the Gas Pipeline Advisory Committee (GPAC), and the Technical Hazardous Liquid Pipeline Safety Standards Committee also known as the Liquid Pipeline Advisory Committee (LPAC), to discuss a variety of policy issues and topics relevant...

- (N) [Hazardous Materials: Public Meeting Notice for the Research, Development & Technology Forum](#)
by the Pipeline and Hazardous Materials Safety Administration on 09/23/2021.



The Pipeline and Hazardous Materials Safety Administration's (PHMSA) Office of Hazardous Materials Safety (OHMS) will hold a public Research, Development & Technology Forum October 12-15, 2021, virtually on Microsoft Teams (MS Teams) to present the results of recently completed projects, brief new project plans, and obtain stakeholder input on...

- (N) [Hazardous Materials: Notice of Applications for New Special Permits](#)
by the Pipeline and Hazardous Materials Safety Administration on 09/09/2021.



In accordance with the procedures governing the application for, and the processing of, special permits from the Department of Transportation's Hazardous Material Regulations, notice is hereby given that the Office of Hazardous Materials Safety has received the application described herein. Each mode of transportation for which a particular...





Code of Federal Regulations

A point in time eCFR system



Website: ecfr.federalregister.gov

The Code of Federal Regulations (CFR) is the official legal print publication containing the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government. The Electronic Code of Federal Regulations (eCFR) is a continuously updated online version of the CFR.

▼ Title 49 Transportation	Part / Section
▼ Subtitle B Other Regulations Relating to Transportation	100 – 1699
▼ Chapter I Pipeline and Hazardous Materials Safety Administration, Department of Transportation	100 – 199
▼ Subchapter D Pipeline Safety	186 – 199
<i>Parts 186-189 [Reserved]</i>	
▶ Part 190 Pipeline Safety Enforcement and Regulatory Procedures	190.1 – 190.411
▶ Part 191 Transportation of Natural and Other Gas by Pipeline; Annual Reports, Incident Reports, and Safety-Related Condition Reports	191.1 – 191.29
▶ Part 192 Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards	192.1 – 192.1015
▶ Part 193 Liquefied Natural Gas Facilities: Federal Safety Standards	193.2001 – 193.2917
▼ Part 194 Response Plans for Onshore Oil Pipelines	194.1 – 194.121
Subpart A General	194.1 – 194.7
Subpart B Response Plans	194.101 – 194.121
Appendix A to Part 194 Guidelines for the Preparation of Response Plans	
Appendix B to Part 194 High Volume Areas	
▶ Part 195 Transportation of Hazardous Liquids by Pipeline	195.0 – 195.591





Code of Federal Regulations

A point in time eCFR system



Website: ecfr.federalregister.gov

Welcome to the new eCFR! Check out our [Getting Started](#) guide to make the most of the new site.

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[Incorporation by Reference](#)

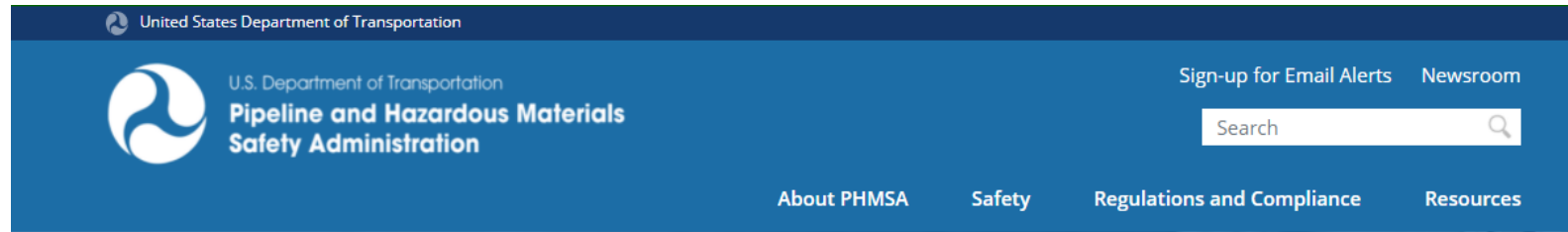
Title 49 – Transportation

Material Approved for Incorporation by Reference

49 CFR (186–199) - Research and Special Programs Administration, Department of Transportation (Pipeline Safety Regulations)

The Director of the Federal Register has approved, under 5 U.S.C. 552(a) and 1 CFR part 51, the incorporation by reference of the following publications. Incorporations by reference found within a regulation are effective upon the effective date of that regulation. For more information on incorporation by reference, see <http://www.archives.gov/federal-register/cfr/ibr-locations.html>.





Website: phmsa.dot.gov

PHMSA's mission is to protect people and the environment by advancing the safe transportation of energy and other hazardous materials that are essential to our daily lives. To do this, the agency establishes national policy, sets and enforces standards, educates, and conducts research to prevent incidents.

Regulations and Compliance

Regulatory Compliance

Please find links to topics related to regulatory compliance.

1. Approvals and Permits
2. Enforcement
3. Field Operations
4. Interpretations
5. Hazardous Materials Registration
6. Legislative Mandates
7. Notices and Advisory Bulletins
8. NTSB Recommendations
9. PHMSA Guidance
10. Pipeline Drug and Alcohol
11. Regulations
12. Standards and Rulemaking

Last updated: Tuesday, April 14, 2020





Website: phmsa.dot.gov

Pipeline Enforcement Guidance

Enforcement Guidance documents are available to clarify PHMSA's enforcement authority by identifying and summarizing precedent, including those from interpretations, advisory bulletins, final orders, and decisions on petitions for reconsideration. The material contained in these documents describe the practices used by PHMSA personnel in undertaking their compliance, inspection, and enforcement activities. This guidance facilitates improved enforcement consistency and is particularly helpful when precedence exists for clarifying performance-based requirements.

[Expand All](#)

[Collapse All](#)

[Corrosion Enforcement Guidance](#)



[Integrity Management Enforcement Guidance](#)



[Operations & Maintenance Enforcement Guidance](#)



[Operator Qualification Enforcement Guidance](#)



[Public Awareness Enforcement Guidance](#)



PHMSA Enforcement Guidance

Enforcement Guidance	Hazardous Liquid Integrity Management Part 195
Revision Date	12/7/2015
Code Section	§195.452(a)
Section Title	Pipeline integrity management in high consequence areas.
Existing Code Language	<p>(a) <i>Which pipelines are covered by this section?</i> This section applies to each hazardous liquid pipeline and carbon dioxide pipeline that could affect a high consequence area, including any pipeline located in a high consequence area unless the operator effectively demonstrates by risk assessment that the pipeline could not affect the area. (Appendix C of this part provides guidance on determining if a pipeline could affect a high consequence area.) Covered pipelines are categorized as follows:</p> <p>(1) Category 1 includes pipelines existing on May 29, 2001, that were owned or operated by an operator who owned or operated a total of 500 or more miles of pipeline subject to this part.</p> <p>(2) Category 2 includes pipelines existing on May 29, 2001, that were owned or operated by an operator who owned or operated less than 500 miles of pipeline subject to this part.</p> <p>(3) Category 3 includes pipelines constructed or converted after May 29, 2001.</p>
Origin of Code	195-70, 65 FR 75378, December 1, 2000
Last Amendment	195-76A, 67 FR 46911, July 17, 2002
Interpretation Summaries	
Advisory Bulletin/Alert Notice Summaries	
Other Reference Material & Source	<p>API 1160, Managing System Integrity for Hazardous Liquid Pipelines, (latest edition).</p> <p>PHMSA Liquid Integrity Management Supplemental Guidance, Segment Identification.</p> <p>Part 195, Appendix C.I. Identifying a high consequence area and factors for</p>



PHMSA Enforcement Guidance

	<p>considering a pipeline segment's potential impact on a high consequence area.</p> <p>Federal Register / Vol. 65, No. 232 / Friday, December 1, 2000 / Rules and Regulations at Page 75389.</p> <p>PHMSA Hazardous Liquid Integrity Management FAQs:</p> <p>1.4 What is a high consequence area (HCA)?</p> <p>1.7 What was DOT's purpose for creating an Appendix C rather than placing this material in the regulation?</p> <p>2.1 Does the rule apply to more than line pipe?</p> <p>2.2A What are Category 1, 2, or 3 under the low-stress pipelines in rural areas, §195.12?</p> <p>2.3 Do the requirements of the rule apply to "idle" pipe?</p> <p>2.4 Does the rule apply to offshore pipelines?</p> <p>2.5 What is meant by 'operator who owns or operates a total of 500 or more miles of pipeline' in 195.452 (a)?</p> <p>2.6 If the operator of a small pipeline system is partially owned by another company, who is responsible for preparing the Baseline Assessment Plan and complying with the provisions of this rule - the operator, or the company that is part owner?</p> <p>2.7 If a company acquires additional pipeline in late 2001 that increases its total mileage over 500, are they covered by the rule? Are the compliance deadlines the same?</p> <p>2.9 If a pipeline subject to 195.452 is sold, does the new operator 'inherit' integrity management plans and deadlines from the original operator?</p> <p>2.10 Who will be held accountable for implementing Integrity Management requirements in a case where an operator transfers ownership of pipeline assets to another company but retains responsibility, by contract, for maintenance and integrity management activities until some later date?</p> <p>2.11 If a pipeline transports both gas and liquids (e.g., some off shore lines), does the hazardous liquid integrity management rule apply, or does the gas integrity management rule apply?</p> <p>2.12 Does the rule apply to the operator of a marketing facility if that operator does not own or operate a pipeline but rather receives and delivers hazardous liquid from/to third-party pipelines?</p>
Guidance Information	<p>1. §195.452(a) is primarily about the applicability of the IM requirements. This paragraph establishes that pipelines which could affect HCAs are subject to the requirements in the remaining paragraphs of §195.452; and it defines three categories of pipe for which different deadlines are established. Subsequent paragraphs in §195.452 identify the requirements and deadlines that apply to these categories of pipe.</p> <p>2. §195.452(a) should generally not be cited for inadequacies or deficiencies in an operator's approach to identify pipeline segments that could affect HCAs. §195.452(f)(1) specifies that an operator must have a process that identifies which pipeline segments could affect HCAs. Thus deficiencies in the process for identification of pipeline segments that could affect HCAs are generally cited under §195.452(f)(1).</p>




PHMSA Enforcement Guidance

	<ol style="list-style-type: none"> 3. If the operator does not identify segments that could affect HCAs, this should generally be cited under §195.452(b)(2). 4. §195.452 (a) does provide that an operator can exclude pipeline segments in HCAs from being subject to the IM program requirements if the operator can demonstrate by risk assessment that the pipeline could not affect the HCAs. In practice, this is normally done by an analysis that reasonably demonstrates that an HCA would not be affected by a pipeline release (e.g., a carbon dioxide release would not impact a nearby waterway). <p>Selected Final Orders Referencing §195.452 (a).</p> <ol style="list-style-type: none"> 1. Phillips 66 Transportation Company, [1-2002-5007, Item 1], June 23, 2003. The operator had HVL pipeline segments that intersected drinking water HCAs that were not identified as segments that could affect those HCAs. The operator asserted that these lines could not impact HCAs, but provided no technical justification to justify this determination. 2. Idaho Pipeline Corporation, [5-2008-5006, Item 2], December 5, 2008. The operator failed to identify if its pipeline could impact HCAs and did not demonstrate through risk assessment that its line could not affect HCAs.
Examples of a Probable Violation or Inadequate Procedures	<ol style="list-style-type: none"> 1. Failure to effectively demonstrate through risk assessment or other technical justification that line segments intersecting HCAs could not affect those areas. 2. Failure to provide adequate justification for the categorical exclusion of the potential effect of HVL releases on drinking water or ecological USAs. 3. Failure to include idle pipe in the IM Program and not justifying why this pipe could not affect HCAs. <p><i>Depending on the circumstances, some of the examples listed in this section may be inadequate plans and procedures, and not probable violations. Thus, the enforcement tool to address these issues would be a Notice of Amendment and not a Notice of Probable Violation or a Warning Letter. Section 3 of the Enforcement Procedures provides guidance on selecting the appropriate enforcement action.</i></p>
Examples of Evidence	<ol style="list-style-type: none"> 1. Integrity Management Plan or Program, or applicable portion that shows an omission or deficiency in the Plan or Program. 2. Documented conversations with operator or contractor personnel identifying inconsistencies or problems regarding the assets included in its integrity management program, or the pipe category definitions. 3. Maps or other records depicting the assets included in the integrity management program.



PHMSA Interpretations – Not Enforceable as Code



INTERPRETATIONS
BROWSER

[View All](#)

[Hazmat](#)

[Pipelines](#)

Home » Regulations » Parts

Interpretation Response #PI-20-0001

Below is the interpretation response detail and a list of regulations sections applicable to this response.

Interpretation Response Details

Response Publish Date: 06-09-2021
Company Name: Public Utilities Commission of Nevada **Individual Name:** Mr. Neil Pascual
Location state: NV **Country:** US

[View the Interpretation Document](#)

Response text:

Mr. Neil Pascual
Senior Pipeline Engineer
Public Utilities Commission of Nevada
1150 East William Street
Carson City, NV 89701

Dear Mr. Pascual:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 Code of Federal Regulations (CFR) Part 192. Specifically, you requested an interpretation regarding §§ 192.197 and 192.201.



PHMSA Guidance and Resources

[Home](#) / [Regulations and Compliance](#)

PHMSA Guidance

PHMSA guidance is intended to help regulated entities and the public to understand PHMSA's regulations. The guidance documents contained herein lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. DOT may not cite, use, or rely on any guidance that is not available through this guidance portal, except to establish historical facts.

Although some of the materials that can be accessed from this page may fall outside the definitions of "guidance" set forth in 49 CFR 5.25(c), PHMSA has determined that they include potentially useful information for stakeholders and is including them in this database in an effort to make these materials easier for members of the public to find. You may also find useful information that is potentially not accessed from the page in the links below:

- [PHMSA FAQs](#)
- [PHMSA Advisory Bulletins](#)
- [Pipeline Enforcement Guidance](#)
- [Pipeline Glossary](#)
- [Pipeline Guidance Manuals](#)
- [Pipeline Operator Resources](#)
- [Pipeline Technical Resources](#)
- [Hazardous Materials Publications](#)
- [Hazardous Materials Safety Field Operations and Enforcement Guidance](#)



PHMSA Pipeline Glossary

Enter Phrase:

331 Matching Terms:

- Hazardous material
- Hazardous Site
- Hazards Analysis
- High Consequence Area (HCA)
- High Population Area
- High Pressure Distribution System
- Highly Volatile Liquid (HVL)
- Holiday
- Hoop Stress
- Hydrogen Induced Damage
- Hydrostatic Pressure Testing
- Identify
- Immediate Corrective Action
- Immediate Repair Condition
- In-Service Pipeline
- Inactive Pipeline
- Incident
- Incident Command System
- Individual
- Industrial User
- Instrumented Incident

Inactive Pipeline

An inactive pipeline is a [pipeline](#) that is not presently being used to transport oil or natural gas but that is being maintained in accordance with regulatory requirements so that it can be put back in to active use if needed.



PHMSA Technical Resources

Pipeline Technical Resources Overview

Related Links

- [Pipeline Replacement Updates](#)
- [Pipeline Technical Resources](#)

Contact Us

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Transportation, Pipeline and
Hazardous Materials Safety
Administration
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Washington, DC 20590
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Email:
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Phone: 202-366-4595

Fax: 202-366-4566

Business Hours:
9:00am-5:00pm ET, M-F

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety, provides technical information on selected pipeline safety topics. This information is oriented primarily toward operators to provide information useful for complying with the pipeline safety regulations; however, all stakeholders may find this material informative. This site is updated as needed to reflect new developments or to include information pertinent to these topics.

Alternative MAOP	Liquefied Natural Gas
Cased Crossings and Guided Wave Ultrasonics	Low Strength Pipe
Class Location Special Permits	Operator Qualification
Control Room Management	Pipeline Construction
Gas Distribution Integrity Management Program	Pipeline Materials
Gas Transmission Integrity Management	Public Meetings
Hazardous Liquid Integrity Management	Risk Modeling Group
High Volume Excess Flow Valves	Research and Development (R&D)
Oil Spill Exercise and Response Training Videos	Underground Natural Gas Storage



PHMSA Technical Resources – FAQs (Not Enforceable)

Questions submitted by Operators and Industry with answers by PHMSA

- Gas Transmission and Hazardous Liquid Integrity Management
- Operator Qualifications
- Operations and Maintenance
- MAOP Reconfirmation

FAQ-17. What is an identified site? [05/19/2004]

An identified site is an area where people congregate near the pipeline meeting one of three criteria:

- It is an outside area or open structure occupied by 20 or more persons on more than 50 days in any 12-month period (the days need not be consecutive).
- It is a building occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period (the days and weeks need not be consecutive), or
- It is a facility occupied by persons of limited mobility, e.g., hospitals, prisons, day-care facilities, schools, retirement communities or assisted living centers.



Read the Playbook!

Website:

<https://www.phmsa.dot.gov/forms/pipeline-forms>

PHMSA maintains the latest Inspection Question Sets on their website!

Pipeline Inspection Forms

Title	Description
PHMSA Gas Distribution IA Question Set	PHMSA Gas Distribution IA Question Set
PHMSA Gas Transmission IA Question Set	PHMSA Gas Transmission IA Question Set
PHMSA Hazardous Liquid IA Question Set	PHMSA Hazardous Liquid IA Question Set
PHMSA LNG IA Question Set	PHMSA LNG IA Question Set
PHMSA Underground Natural Gas Storage IA Question Set	PHMSA Underground Natural Gas Storage IA Question Set
PHMSA Drug Alcohol IA Question Set	PHMSA Drug Alcohol IA Question Set



Using PHMSA Inspection Questions

Example from PHMSA Gas Distribution IA Question Set

MO.GOMAAP.MAOPDETERMINE.R – Primary 192.619(a); Secondary 192.619(b), 192.621(a), 192.621(b), 192.623(a), 192.623(b)

Do **records** indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?

- (2) The pressure obtained by dividing the pressure to which the pipeline segment was tested after construction as follows:
- (i) For plastic pipe in all locations, the test pressure is divided by a factor of 1.5.
 - (ii) For steel pipe operated at 100 psi (689 kPa) gage or more, the test pressure is divided by a factor determined in accordance with the Table 1 to paragraph (a)(2)(ii):

Table 1 to Paragraph (a)(2)(ii)

Class location	Installed before (Nov. 12, 1970)	Factors, 1 2 segment -		
		Installed after (Nov. 11, 1970) and before July 1, 2020	Installed on or after July 1, 2020	Converted under § 192.14
1	1.1	1.1	1.25	1.25
2	1.25	1.25	1.25	1.25
3	1.4	1.5	1.5	1.5
4	1.4	1.5	1.5	1.5

Expand Table



Using PHMSA Inspection Questions

Distribution Question – Interference Currents

TD.CPMONITOR.INTFRCURRENT.R– Primary 192.491(c); Secondary 192.473(a)

Do **records** document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?

§ 192.473 External corrosion control: Interference currents.

- (a) Each operator whose pipeline system is subjected to stray currents shall have in effect a continuing program to minimize the detrimental effects of such currents.
- (b) Each impressed current type cathodic protection system or galvanic anode system must be designed and installed so as to minimize any adverse effects on existing adjacent underground metallic structures.

[Amdt. 192-4, 36 FR 12302, June 30, 1971, as amended by Amdt. 192-33, 43 FR 39390, Sept. 5, 1978]



Using PHMSA Inspection Questions

Distribution Question – Cutout Pipe

TD.ICP.EXAMINE.R– Primary 192.491(c); Secondary 192.475(a), 192.475(b)

Do **records** document examination of removed pipe for evidence of internal corrosion?

- (b) Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion. If internal corrosion is found -
 - (1) The adjacent pipe must be investigated to determine the extent of internal corrosion;
 - (2) Replacement must be made to the extent required by the applicable [paragraphs of §§ 192.485, 192.487, or 192.489](#); and
 - (3) Steps must be taken to minimize the internal corrosion.



PHMSA Integrated Inspections

All Applicable Inspection Questions are fair game!

Beginning around 2008, PHMSA began to overhaul its pipeline inspection regimen, introducing a new inspection process that integrated several of its individual inspection types in order to better focus its inspection resources on higher risk facilities and areas of concern.

Integrated Inspections typically cover 3-5 years of records including:

- Construction
- Operator Qualifications
- Operations and Maintenance
- Corrosion Control
- Integrity Management
- Emergency Response
- Public Outreach
- Control Room Management



PHMSA Integrated Inspections - Preparation

Simple steps for a successful audit

- Understanding the different types of questions
 - Groups
 - Screening, Procedures, Records, Observations
- Conducting Internal Audits
 - Are electronic records organized?
 - Are records complete?
- Coaching Operations Personnel
 - Responding to Questions
 - Performing an Observed Task
- Playing Defense



PHMSA Integrated Inspections - Preparation

Quiz Time!

Who is most likely to act as the inspector's tour guide?

- Plants?
- Pipelines/ROW/MLVs?
- Construction Sites?



PHMSA Compliant Job Book

Project Design	Project Drawings	Pressure Test Reports	Material Documentation	Welding and NDT	Operator Qualifications (OQ)
<ul style="list-style-type: none"> • Design Basis • Internal Stresses • External Stresses • Capacity Calcs • Valve Spacing • Class/HCA/MCA • Pressure Test Requirements 	<ul style="list-style-type: none"> • As-Built • Heat Maps • Weld Maps • Survey • Design Drawings • PFD/PID • Vendor/Vessel • CP/AC • E&IC • Fire Protection • Civil/Structural 	<ul style="list-style-type: none"> • Operator, Employee, Test Company • Medium • Test Pressure • Duration • Record of Pressures • Elevations • Leaks/Failures • TEST EXTENTS!!! 	<ul style="list-style-type: none"> • Bill of Material (BOM) • Purchase Orders • Material Test Reports (MTRs) • Certs of Compliance • Shell Tests • Material Req's • Receiving Reports 	<ul style="list-style-type: none"> • Weld Inspection Reports • Weld Procedure Spec's (WPS's) • Weld Procedure Qual Reports (PQR's) • Welder Performance Quals (WPQ) • NDT Reports • NDT Procedures 	<ul style="list-style-type: none"> • Daily Personnel Documentation • Company Personnel OQ • Contractor Personnel OQ • NDT Technician Certifications and Visual Acuity Tests

Other Considerations

- Prelim/Final ILI reports
- Pipeline Examination Reports (Internal/External Corrosion)
- Tie-in/Stopple Records
- Cleaning/Drying Reports
- SCADA and/or Point to Point
- Ops Specific Reports
- **Understand Company Manuals and Procedures**

Traceable

- Include Job ID/WO#/AFE on *all docs*

Verifiable

- Ensure Consistent Info between *all docs*

Complete

- Sign and Date *all docs!*

Open Forum / Questions?



***Creating Value for our customers through
internal alignment, enhanced synergies
and integrated project execution.***