PSC Updates, Inspection Observations, Section 114 Updates

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Public Service Commission of Wisconsin

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Agenda

• Inspection Observations/Findings
• PSC Pipeline Safety Updates
• Section 114 Inspections
• Q&A
Inspection Observations & Findings
Inside Meter/Regulator surveys

• 192.723 & 135.723

• Difficulty gaining access

• Follow company procedures for notification

• Best practice to move outside whenever possible
Inside Meter/Regulators

• ADB-2020-01
• “...based on the requirements in § 192.1007(a) for operators to know their systems, PHMSA would expect operators to know the location (inside or outside) of all meters and regulators installed on their distribution system.”

• Do you know where your inside meters are? Inside regulators? How about cathodically unprotected buried vent lines?
Reinstated Piping

- Multiple instances of service lines not being pressure tested after being taken out of service
- 192.725(b) – “Each service line temporarily disconnected from the main must be tested from the point of disconnection to the service line valve in the same manner as a new service line, before reconnecting. However, if provisions are made to maintain continuous service, such as by installation of a bypass, any part of the original service line used to maintain continuous service need not be tested.”
Pipe Storage/Handling

• 192.69 – Must have and follow procedures for storage/handling of pipe
192.147(a) – “Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44…”
Pipe Markings

• 192.63(a) - Except as provided in paragraphs (d) and (e) of this section, each valve, fitting, length of pipe, and other component must be marked as prescribed in the specification or standard to which it was manufactured.
Weak Links

• 192.321(c) – plastic pipe must be installed to minimize tensile stresses
• 192.329(b) & 192.376(b) requires weak link
• Should be included in procedures
Tracer Wire

• 192.321(e) – “Tracer wire may not be wrapped around the pipe and contact with the pipe must be minimized but is not prohibited.”
Meter protection from damage

• 192.353(a) – Meters and service regulators must be protected from damage
Regulator clearance to openings

• 192.355(b)(2) Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must:
  (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building;
Setting/Monitoring Gauges

• Some loss of services experienced

• 192.13(c) - Follow procedures
Biogas Injection

- Interstate pipelines accepting landfill/biogas
- At least 6 locations in Wisconsin with more planned
- Other states have distribution systems accepting biogas
- One operator in Wisconsin has modified tariff to allow RNG into distribution system
Isolated steel services/Mains <100ft

• 192.465(a) – “At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year…”

• 192.465(d) – “Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring”
Bridge Patrolling

• 192.721(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled -
  (1) In business districts, at intervals not exceeding 4 1/2 months, but at least four times each calendar year; and
  (2) Outside business districts, at intervals not exceeding 7 1/2 months, but at least twice each calendar year.

• Access issues
10 year inactive services

• 135.727(gw) – “Special efforts shall be made to include services which have not been used for ten years in a way that will remove gas from the customers' premises.”
Sniff test locations

• 192.625(f) – “Each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.”

• Should be sampling at the extremities of systems

• Is one location enough? Needs to be enough to assure proper concentration at all locations
Regulator set point – Operator/Monitor

• 192.201(a)(2) describes MAOP + allowable build up
• Relief may be set above MAOP
• Must remain within limits in 192.201 at all times
• July 2021 PHMSA interpretation (PI-19-0019)
  • Cannot exceed MAOP during normal operation
  • 30 days is not an immediate response
Purging

• 135.629(cw) – “No pipeline, main, or service shall be purged into any building or confined space.”
Corrosion Control – short sections

• Plastic service w/ anodeless riser
• Inside meter
• Short section of steel pipe between regulator and meter
Service Regulator testing

• PSC 135.744w – “...The test interval shall be the same as the interval between meter changes in the meter rotation program under s. PSC 134.30.”

• PSC 134.30 – “Where pressure regulators, volume corrective devices, or other measuring devices are used on the service or used in conjunction with the meters, they shall be tested on the same schedule as the meters”
PSC Pipeline Safety Updates
Inspector Assignments

• Andrew Baader – NSPW, City Gas, Cranberry Creek Landfill
• Jake Boebel – MGE, SCVNG, Republic Services, Dane Renewable, Marshfield Utilities
• Bryce Graveline – WEGO, WG, MMSD
• Andrew Lindquist – WG, SWLP, Air Liquide
• Alex Rodriguez – WPL, Marabou, Master Meters
• Evan Uphoff – WEGO, Midwest, NEW Organic, La Crosse County, Winnebago County
• Dagmar Vanek – WPSC, Florence, North Shore
Inspection Letters

• All inspection results will be posted quarterly in electronic records filing system (within 90 days)

• Letters will include
  • Probable violations found within previous quarter
  • Continuing violations not resolved
  • Acknowledgement for violations resolved

• All PVs & WLs in letters will have citation

• No longer will attach specialized inspection forms
Field inspections

- Field inspections will include random O&M tasks
  - Leak surveys/patrols
  - Cathodic Protection
  - Valve maintenance
  - Odorization
  - Regulator station maintenance
  - Fusion/welding qualifications
- Either observing crews performing maintenance or random checks of locations
Damage Reporting

• Beginning in 2021 we requested additional information in quarterly damage reports

• Data unique to each excavation damage (see one-call law and PHMSA annual report)

• Information based off CGA DIRT Report

• Please be specific
  • Example - “facility marked inaccurately” – why was it marked inaccurately?

• 192.617 – “Each operator shall establish procedures for analyzing accidents and failures…for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.”
Annual Reports

• PSC reviews for accuracy

• “Other” excavation damages or “Other” leaks

• Do the numbers make sense?
PSC Pipeline Safety Website

• Recently updated website
• Inspection results, statistics, operator information, staff contact info, external links
• https://psc.wi.gov/  > Programs > Pipeline Safety
Section 114 Updates
Section 114

• Self-executing mandate in congressional reauthorization

1. O&M plans must address the replacement or remediation of pipelines that are known to leak based on the material (including cast iron, unprotected steel, wrought iron, and historic plastics with known issues)

2. Pipeline operators must update their plans to minimize, among other things, fugitive emissions and vented emissions from pipeline facilities
   • Fugitive emissions - any unintentional leaks from equipment such as pipelines, flanges, valves, meter sets, or other equipment.
   • Vented emissions - any release of natural gas to the atmosphere due to equipment design or operations and maintenance procedures such as pneumatic device bleeds, blowdowns, incomplete combustion, or overpressure protection venting
Section 114

• The statute requires pipeline operators to complete these updates by December 27, 2021.

• PHMSA and state authorities will inspect operators' revised O&M plans in calendar year 2022, and such inspections must be completed by December 27, 2022.
Section 114 – PSC thoughts and approach

• Will complete specialized inspection with ALL operators in 2022
  • Likely less than a day to complete
  • Will use PHMSA inspection form – similar to specialized forms
  • Complete with other inspections or potentially virtual
  • Will send the inspection form as soon as PHMSA releases
Section 114 – PSC thoughts and approach

• Disclaimer – Pending PHMSA guidance

• Does not take priority over safety
• Good faith effort to address minimizing releases in procedures
• Simply referencing existing practices is likely not enough

• Examples
  • Specifying time frame for leaks to be repaired
  • Minimizing releases from planned projects
  • Flaring
  • Advanced leak detection
  • Added SCADA to relief valves
Section 114 – PHMSA Public Webinar

- February 17, 2022 from 9:30am-5:00pm CT
- Register by February 11th

Will Discuss:

1. Key elements of Section 114;
2. Significant sources of natural gas (primarily methane) emissions from pipelines;
3. Discussion of which types of pipeline facilities must comply with each portion of Section 114;
4. PHMSA and state inspections, including reviews of a pipeline operator's programs and procedures to reduce methane emissions;
5. Inspection topics related to methane reduction and leak-prone pipes;
6. General review of how operators' programs and procedures will be inspected; and
7. The timelines for actions required by Section 114.
Thank you for your attention to Pipeline Safety!

Questions?