

Reporting Requirements

Part 191, Incident and Safety Related
Condition for Natural Gas pipeline facilities and
Underground Natural Gas Storage facilities

A series of horizontal lines in teal and light blue colors, with varying lengths and thicknesses, extending from the left edge of the slide towards the right.

Part 195, Accident and Safety Related
Conditions for HL Pipelines

LNG §193.2011 Reporting

Incidents, safety-related conditions, and annual pipeline summary data for LNG plants or facilities must be reported in accordance with the requirements of Part 191 of this subchapter.

Part 191 Reports

- Incidents
- Safety related conditions



This Part Does Not Apply To:

191.1 (b)



- Offshore gathering of gas
 - Upstream from the outlet flange of each facility where hydrocarbons are produced
- Outer continental shelf upstream from the point where a production operator transfers responsibility to a transport operator

This Part Does Not Apply To:

- Onshore Gathering of gas
 - Through a pipeline operating at less than 0 psig
 - Through a pipeline not regulated (§192.8)
 - Within inlets of Gulf of Mexico, except for requirements of §192.612



A technician opens a pressure gas valve inside the Oil and Natural Gas Corp (ONGC) group gathering station on the outskirts of the western Indian city of Ahmedabad

Incident - §191.3

Incident means any of the following events:

An event that involves a release of gas from a pipeline, gas from an underground natural gas storage facility, 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:

Incident - §191.3

- Death or personal injury necessitating in-patient hospitalization;
- Estimated property damage of \$50,000 or more, including loss to operator and others, but excluding the cost of gas lost; or
- Unintentional estimated gas loss of three million cubic feet (3,000 MCF) or more

Incident - § 191.3



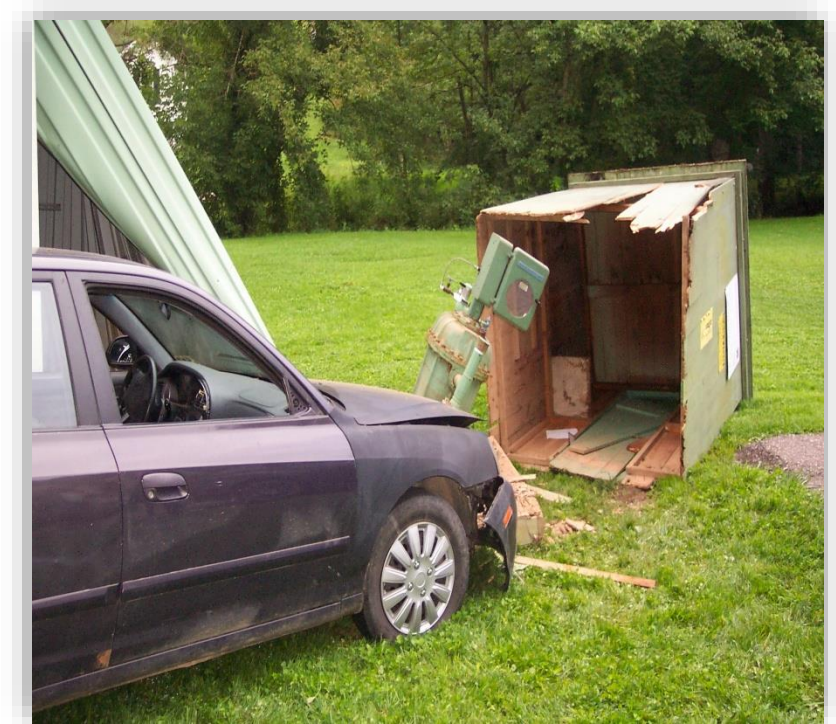
Emergency
Shutdown of an
LNG Facility or an
underground
storage facility

(Activation of ESD for reasons other than an actual emergency does not constitute an incident)

Incident - §191.3

- Significant in Judgment of the Operator

**Even though it
doesn't meet criteria**



Significant Events

- Operator should define these significant events
 - Lower thresholds for property loss
 - Emergency response
 - Media
 - Loss of Customers

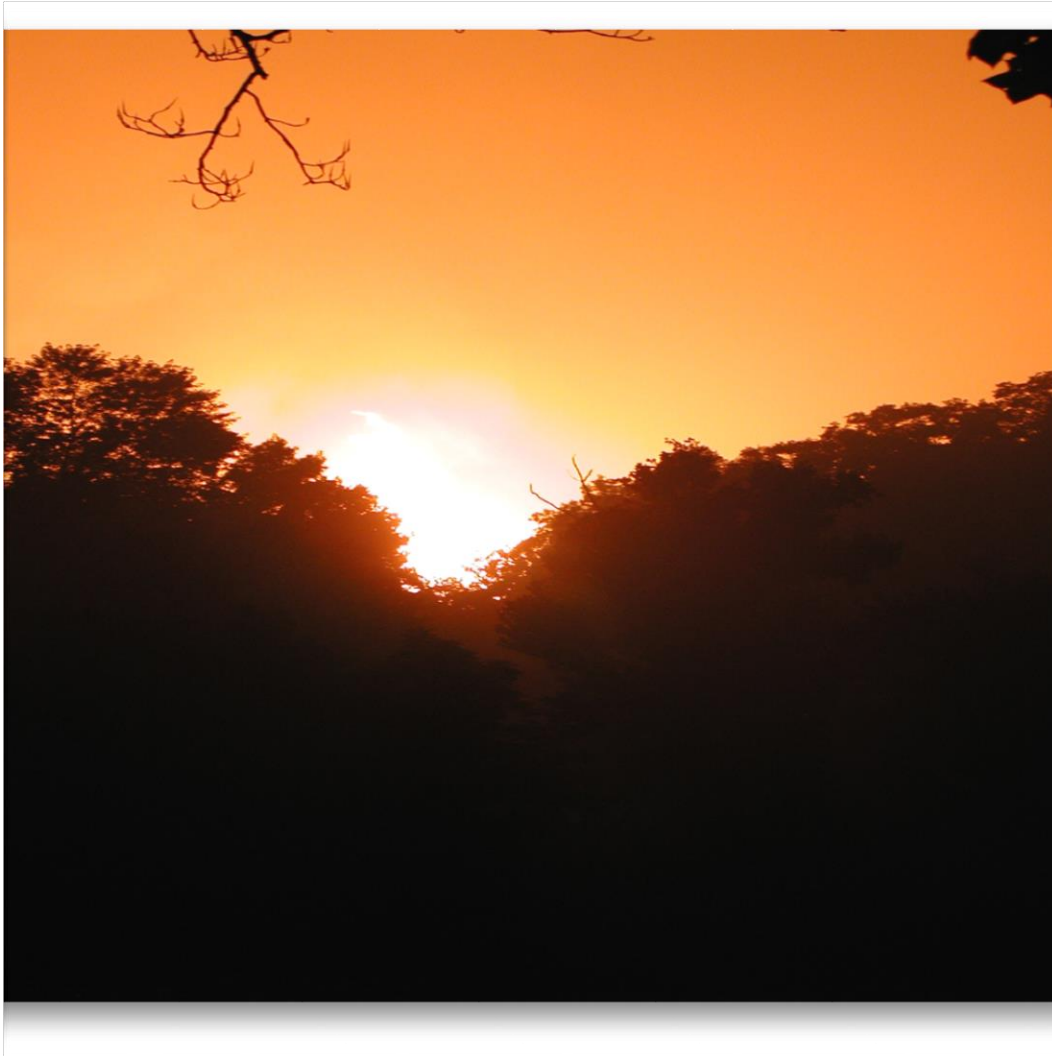
Intrastate operators may be driven by state regulations



Incidents (§ 191.3)

If you go out to a site on or near a pipeline and you see this:

You May Have an Incident



30" pipeline
operating at 800 psi
at 11 o'clock pm.

Glow seen for 30
miles



Hole the next morning.



Glow in the sky
from a 40,000 HP
compressor station
being destroyed by
tornados.

There were at least
a dozen people
whose lives were
saved due to the
glow in the sky, and
being able to see
the tornados.



40,000 HP station
destroyed by 2 or
more F-2 tornados.



Minneapolis, MN
March 17, 2011

The explosion happened in a 20-inch steel line that was installed in 1994. No one lost power, except for those who asked for the gas to be shut off. Minneapolis 911 did not receive any calls about a gas leak in the area prior to the fire.



Philadelphia, PA January, 2011

A gas main explosion in a Northeast Philadelphia neighborhood that sent a 50-foot fireball into the sky, left one person dead (gas company employee), injured five others and forced dozens of residents from their homes

What should an operator do when there is a reportable incident?

- Activate Emergency Response Plan
- Notify the NRC “at the earliest practicable moment following discovery”(§191.5)
- No later than one hour after confirmed discovery

What should an operator do when there is a reportable incident?

Within 48 hours after the confirmed discovery of an incident, to the extent practicable, an operator must revise or confirm its initial telephonic notice required in paragraph (b) of this section with,

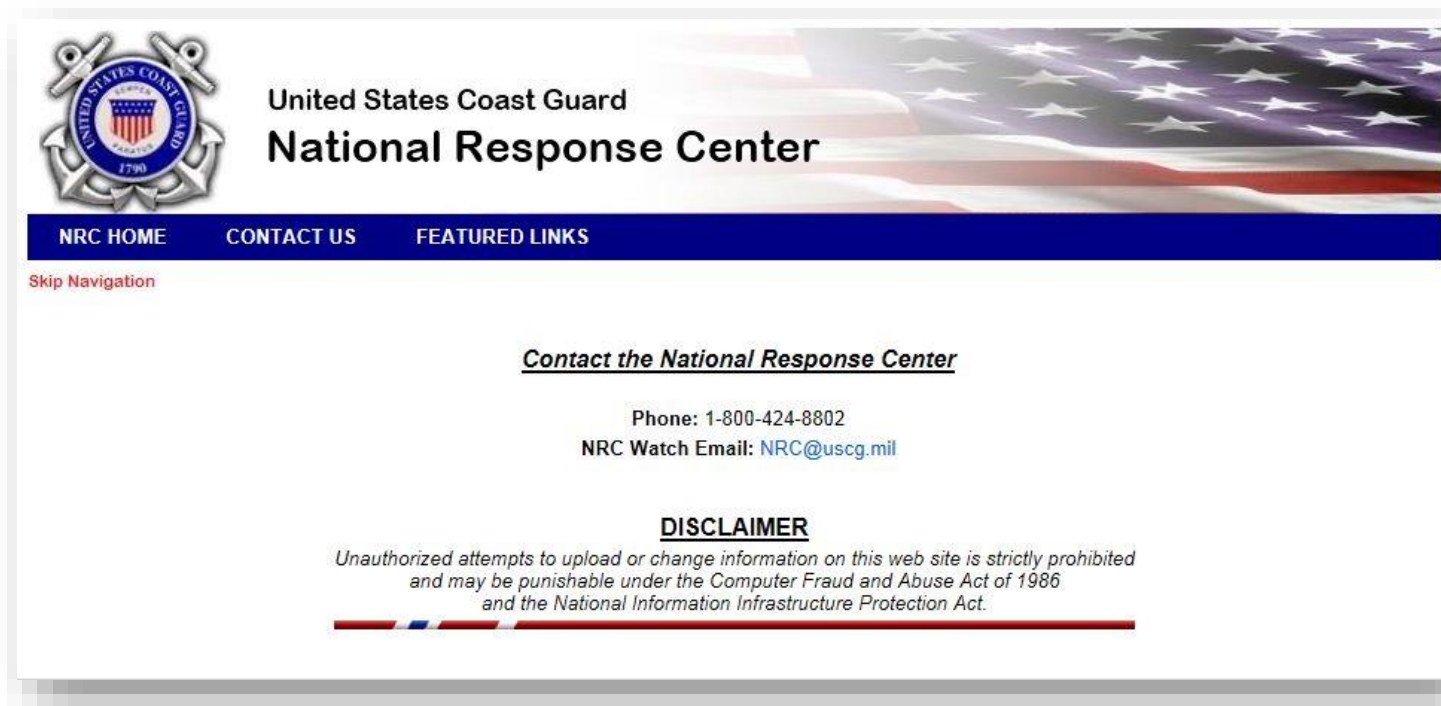
- an estimate of the amount of product released,
- an estimate of the number of fatalities and injuries, and
- all other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages.

What should an operator do when there is a reportable incident?

If there are no changes or revisions to the initial report, the operator must confirm the estimates in its initial report.

§ 191.5 - Immediate Notice

- National Response Center 1-800-424-8802
 - <http://www.nrc.uscg.mil>
- Online Reporting No Longer Available!



Post-Incident

- Complete an incident form as soon as practicable, but within 30 days
 - §191.9 (distribution) or §191.15 (transmission)
- Filed electronically (§191.7)
 - Form RSPA F 7100.1 (Distribution) or
 - Form RSPA F 7100.2 (Transmission)
- Additional supplemental reports as needed
- Final report

***MASTER METER
OPERATORS EXEMPT***

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



Not an Incident?

- NRC (telephone) notice cannot be rescinded
- No 30 day report required
- Courtesy call to PHMSA or appropriate State Agency



Not an Incident?

- If after filing the 30 day report, the operator determined the event does not meet the definition of an incident, the operator must send a letter requesting the incident be rescinded.
- Only operator can rescind report!

Report Submission

- §191.7 If electronic reporting imposes an undue burden and hardship, operator may submit written request for an alternative reporting method.
 - Request must describe the undue burden and hardship
 - PHMSA will review request, and may authorize in writing and alternative reporting method.

Report Submission

- Operator may still be required to file a written report with your state regulatory agency!
- Reporting to the NRC will NOT automatically send a copy to the state

Part §195.50 Reporting accidents

- An accident report is required for each failure in a pipeline system subject to this part in which there is a release of the hazardous liquid or carbon dioxide transported resulting in any of the following:

Part §195.50 Reporting Accidents

(a) Explosion or fire not intentionally set by the operator

(b) Release of 5 gallons (19 liters) or more of hazardous liquid or carbon dioxide, except that no report is required for a release of less than 5 barrels (0.8 cubic meters) resulting from a pipeline maintenance activity if the release is:

Part §195.50 Reporting Accidents

- (1) Not otherwise reportable under this section;
- (2) Not one described in § [195.52\(a\)\(4\)](#);
- (3) Confined to company property or pipeline right-of-way; and
- (4) Cleaned up promptly;

Part §195.50 Reporting Accidents

- (c) Death of any person;
- (d) Personal injury necessitating hospitalization;
- (e) Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000.

SAFETY- RELATED CONDITIONS (§ 191.23)

- Each operator shall report the existence of any of the following safety related conditions



SAFETY- RELATED CONDITIONS (§ 191.23)

Any Condition that causes a 20% or more Reduction in Operating Pressure or Shutdown of Operation



SAFETY- RELATED CONDITIONS (§ 191.23)

- Unintended Movement or Abnormal Loading by Environmental Causes which could affect the serviceability or the Structural Integrity of the Pipeline



SAFETY- RELATED CONDITIONS (§ 191.23)

- A leak that constitutes an emergency
 - Emergency responders such as police or fire department are on scene.



SAFETY- RELATED CONDITIONS (§ 191.23)

- Any Malfunction or Operating Error that causes the pressure to exceed MAOP plus buildup.



SAFETY- RELATED CONDITIONS (§ 191.23)

- General Corrosion
- Localized Corrosion Pitting
 - To a degree where Leakage Might Result
 - Where Wall Loss due to Corrosion Requires the MAOP to be Reduced

**Pipelines operating at
20% SMYS or more**



SAFETY- RELATED CONDITIONS

(§ 191.23)

Any Material Defect or Physical Damage that Impairs the Serviceability

Pipelines operating at 20% SMYS or more



SAFETY- RELATED CONDITIONS (§ 191.23)

Any Crack or other Material Defect
that Impairs the Structural Integrity
or reliability of an
underground natural gas
Storage or LNG
Facility



SAFETY- RELATED CONDITIONS (§ 191.23)

- Inner Tank Leakage, Ineffective Insulation, or Frost Heave that impairs the Structural Integrity of an LNG Storage Tank

LNG Facilities



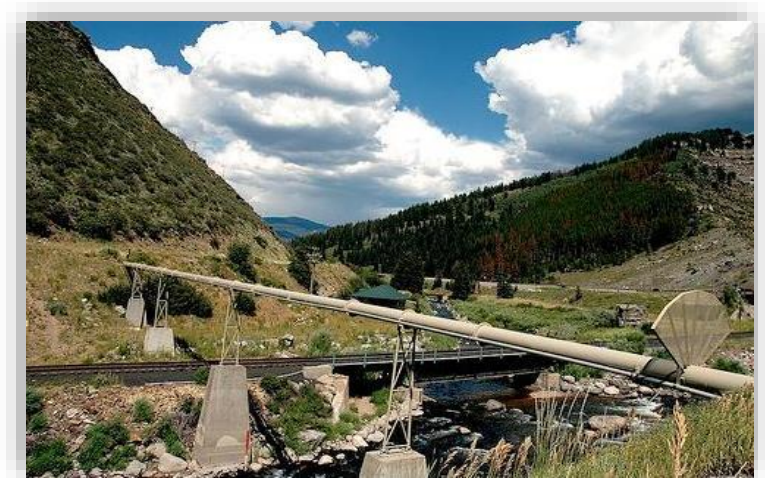
SRC

A report is not required for SRC that-

- Exists on a Master Meter System or a Customer-Owned Service Line
- Is a Reportable Incident
- Exists on a Pipeline (other than LNG or UNGS) that is more than 220 yards from any Building Intended for Human Occupancy
- Is corrected Before the Deadline for filing

SAFETY- RELATED CONDITIONS

- Reports are required for:
- Conditions within the Right-of-Way of
 - an Active Railroad, Paved Road, Street,
 - or Highway, or within 220 yards of a building suitable for human occupancy



Filing Safety Related Condition Reports (§191.25)

- Within 5 working days of Determination
- No more than 10 working Days After Discovery
- No specific form
 - Information Requirements are in §191.25

InformationResourcesManager@dot.gov

Fax to (202) 366-7128

Time Frame For Submitting Safety Related Condition Reports

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

**Working days excludes Saturdays, Sundays,
and Federal Holidays**

Summary for Reporting Requirements

- Operators should have:
 - Written procedures
 - Forms and information available
 - Review process and work
- Inspectors should check for:
 - Completeness and accuracy
 - Timely and appropriate reporting
 - Supplemental reports as required
 - Failure investigations (§192.617)

Information Websites

- PHMSA Forms and Reporting Instructions
- <http://www.phmsa.dot.gov/pipeline/library/forms>
- PHMSA Pipeline Safety Regulations
- <http://www.phmsa.dot.gov/pipeline/tq/regs>
- PHMSA National Pipeline Mapping System
- <http://www.npms.phmsa.dot.gov/>