

Kansas Corporation Commission



Pipeline Safety Interpretations

KCC Interpretations of Pipeline Safety Regulations

- **GOALS**

- *Discuss questions related to regulation*
- *Receive input from operators*
- *Issue written statements on interpretation*
 - *Vetted through operators and PHMSA.*

KCC Little Known Deadlines

- **Transmission pipes NPMS map filings**
 - **49 USC Sec. 60132 01/19/04 National pipeline mapping system. Not a regulation.**
 - **shall provide to Geospatial data for use in the NPMS.**
 - ***shall provide PHMSA updates of the information to reflect changes in the pipeline facility***

KCC Little Known Deadlines

- ***ONE CALL DAMAGE REPORTS***
- ***If receive more than 2000 locates per year, must report damages***

EVERY SIX MONTHS.....

- ***Due in February and August.***

KCC Little Known Deadlines

- **CONSTRUCTION NOTICES**

- **For small operator, every job greater than 500 feet.**
- **For large operator, every job greater than 1000 feet.**
- ***At least 10 business days before the commencement of the construction project.***

KCC Little Known Deadlines

- **CONTRACTOR NOTICES**

- **For small operator, must notify KCC when a consultant is performing a survey or inspection for pipeline safety.**
- ***At least 10 business days before the survey or inspection is to be conducted by the consultant.***

Other One Call Requirements

- *Each excavator using trenchless excavation techniques shall implement operating guidelines for trenchless excavation techniques.*
- *(1) Training in the One Call Law.*
- *(2) training in “Potholing” when the excavation path crosses an existing facility;*
- *(3) calibration procedures for the locator and sonde if this equipment is used by the excavator;*
- *(4) recordkeeping procedures for measurements taken while boring;*
- *(5) monitoring a horizontal drilling tool when backreaming across an existing facility;*
- *(6) Appropriate clearance from existing facilities during excavation and placement of new underground facilities;*
- *(7) Visually check the drill head and pullback device as they pass through potholes,*
- *(8) emergency procedures for unplanned utility strikes.*

Safety Related Conditions

- A leak in a pipeline that constitutes an emergency.
- (8) Any safety-related condition that could lead to an imminent hazard and causes a 20 percent or more reduction in operating pressure *or shutdown of operation* of a pipeline that contains gas.
 - ***UNLESS***

Safety Related Conditions

- *The condition exists on a pipeline more than 220 yards 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*
- *Is corrected by repair or replacement within 10 working days of discovery.*

Safety Related Conditions Reporting

- *(a) Received by the commission in writing within five working days*
- *The report must be headed "Safety Related Condition Report" and provide the following information:*
- *(1) Name and principal address of operator*
- *(2) Date of report.*
- *(3) Name, job title, and business telephone number of person submitting the report.*
- *(4) Name, job title, and business telephone number of person who determined that the condition exists.*
- *(5) Date condition was discovered and date condition was first determined to exist.*
- *(6) Location of condition, with reference to the State (and town, city, or county) nearest street address, offshore survey station number, milepost, landmark, or name of pipeline.*
- *(7) Description of the condition, including circumstances leading to its discovery, any significant effects of the condition on safety, and the name of the commodity transported or stored.*
- *(8) The corrective action taken (including reduction of pressure or shutdown) before the report is submitted and the planned follow-up future corrective action, including the anticipated schedule for starting and concluding such action.*

KCC Interpretation

Safety Related Conditions

- ***If the operator has a significant event:***
 - ***(outage with >50 customers out of service;***
 - ***Pipeline cut, odor release, or other event with media attention;***

KCC Interpretation

Safety Related Conditions

- ***Notify the KCC within 2 hours of receiving notice...***
 - ***(preferably sooner!)***

Damage Prevention Requirements

- ***(c) The damage prevention program must:***
- ***(1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.***
- ***(2) Provide notification of the persons identified in paragraph (c)(1) of this section as often as needed to make them aware of the damage prevention program:***
- ***(i) The program's existence and purpose; and***
- ***(ii) How to learn the location of underground pipelines before excavation activities are begun.***

KCC Interpretation on Excavator lists

- ***SENDING A LIST FROM THE PHONE BOOK TO KANSAS ONE CALL IS NOT SUFFICIENT!!!!***
- ***Review KOC excavator meeting list to see if excavators in your area attended the meeting.***

KCC Interpretation on Excavator lists

- ***SENDING A LIST FROM THE PHONE BOOK TO KANSAS ONE CALL IS NOT SUFFICIENT!!!!***
- ***Review KOC excavator mailing list to see if excavators in your area received the mailing.***
- ***Do they understand it?***

§192.617 *Investigation of failures*

- *. (a) Establish procedures for analyzing accidents and failures, including:*
- *(1) The maintenance of records that contain information for each failure including the type of pipe and the reason for failure.*
- *(2) The selection of samples of the failed facility or equipment for laboratory examination, where appropriate,*
- *(b) Each operator shall investigate each accident and failure.*

KCC Interpretation

What is a failure?

- SIMPLE ANSWER:
- A LEAK IS A FAILURE.

KCC Interpretation

What is an Investigation?

- Is the response, “UNKNOWN” an acceptable answer?

Failure Investigation

- **Leak on Plastic Pipe**
- All PE failures, (Leaks), must be investigated.

Failure Investigation

- **Unprotected bare steel yard line leak**
- Can we just call it corrosion?
 - Any evidence that compression fittings were installed?
 - What is the CP reading on the pipe?

Failure Investigation

- **Protected steel main leak**
- Can we just call it corrosion?
 - Why did the pipe fail?
 - What was the extent of the corrosion?
 - What was the extent of the CP problem?
 - Soil resistivities taken?

Failure Investigation

Tracer Wire

- Can we just call it broken?
 - Where did it break?
 - Was it corrosion?
 - Can you fix it?

Required Procedures

- Each operator shall prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response.

A procedure gives steps on HOW to do something. It's not a definition.

Public Awareness

Supplemental Messages

- Baseline says send a bill stuffer.
- Do the right people get the message?
 - Bill goes to another town
 - Shift work at a hospital, not all maintenance shifts get the bill stuffer.
 - Factories,

Public Awareness

what does adjacent mean?

- Landowner?
 - Request landowner inform his tenants?
- Farmer?
- House across the street?

Gas gathering and Distribution

- Gathering: moves gas FROM production TO transmission
- Distribution moves gas to end user.

KCC Interpretation

- End use customers connected to gathering are distribution piping.
 - Odorization.
 - Leak surveys.
 - Public awareness
 - One call.
 - Does this apply to the company office?

Blasting near pipelines

- Can KCC prohibit blasting near a pipeline?
 - No. We can require the operator to survey their pipe to make sure no damage occurs.
- API has published guidelines on blasting close to pipelines.