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DOT Docket Management System
Docket No. PHMSA-2015-0205
U.S. Department of Transportation
1200 New Jersey Ave., SW
Washington, DC 20590

RE: Comments of the American Petroleum Institute on “Pipeline Safety: Information Collection Activities (OMB Control No. 2137-0522):” Docket No. PHMSA-2015-0205

The American Petroleum Institute (“API”)¹ appreciates the opportunity to comment in response to the Notice and request for public comment on proposed revisions to the incident report forms for natural gas transmission and gathering lines (*OMB Control Number: 2137-0522*) (hereinafter Notice)². API acknowledges the importance of incident data and has long supported data collection efforts to help industry and stakeholders learn from prior failures to increase pipeline safety and public awareness.

As noted in API’s recent comments on PHMSA’s Notice of Proposed Rulemaking (NPRM) “Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines” (81 Fed. Reg. 20,722), API urges PHMSA to coordinate the proposed changes to the incident forms (F7100.2) with the comments submitted on the NPRM (hereinafter NPRM)³. PHMSA should acknowledge that the concurrent requests for public comment presented a considerable challenge to industry given the expansive nature and expected impact of the NPRM. Therefore, the comments presented in this letter are limited in scope and API would like to engage with PHMSA further on the development of the revised incident forms.

In general, API recommends that PHMSA design a form that is specific to gathering lines. Similar to API’s comments in the NPRM, PHMSA should be mindful when applying

¹ API is the national trade association representing all facets of the oil and natural gas industry, which supports 9.8 million U.S. jobs and 8 percent of the U.S. economy. API’s more than 650 members include large integrated companies, as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms.

² 81 Fed Reg. 29,943 (May 13, 2016)

³ 81 Fed. Reg. 20,722 (Apr. 8, 2016)

transmission line criteria to gathering lines. There are numerous instances throughout the proposed form where it will be impossible for gathering operators to respond. Further, due to the overall length and complexity, there are several duplicative questions which could also hinder operator responses. At a minimum, API requests that PHMSA provide the option to select “unknown.”

API stands ready to work with PHMSA to develop revised incident forms that are consistent with the goal of using data and learnings to continuously improve the effectiveness of pipeline safety programs, enhance the knowledge and capability of emergency personnel responding to a pipeline incident, and promote public awareness of pipeline infrastructure. Notwithstanding this general support, the Notice raises concerns that require further consideration before PHMSA finalizes the form. API provides comments on the following sections of the incident form: (1) Part A – Key Report Information; (2) Part B – Additional Location Information; (3) Part C – Additional Facility Information; (4) Part D – Additional Consequence Information; (5) Part E – Additional Operating Information; (6) G1 – Corrosion Failure (7) G3 – Excavation Damage; (8) G4 – Other Outside Force Damage; (9) G5 – Material Failure of Pipe or Weld; (10) G6 – Equipment Failure (11) Part J – Integrity Inspections; and (12) Part K – Contributing Factors.

API asks that PHMSA give serious consideration to the requests proposed for each of the sections listed below and looks forward to working PHMSA in strengthening the form to support pipeline safety.

A handwritten signature in black ink, reading "Robin Rorick". The signature is written in a cursive, flowing style.

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Part A – Key Report Information

In Part A, PHMSA proposes to reorganize existing questions to display the sequence of operator actions and interactions during an incident timeline. PHMSA proposes to move data collected in Part E on how the operator first learned of the pipeline failure to Part A. PHMSA asserts that additional data is necessary to build a complete timeline and requests information on the interactions with emergency responders and details about ignition.

A4 and A13 (local time): It appears as if PHMSA is requesting the same information in both A4 and A13 regarding the initial indication of the incident. Therefore, it is recommended that A4 be deleted. Further, it is not clear if the time zone specified in A13 is the default time zone for the remaining questions in the form. PHMSA should be consistent throughout the form. Lastly, API recommends replacing “identified” with “initial indication.”

A12 (incident identified): The term “identified” is vague. API requests that the sentence be modified to include “initial indication.” This term should then be applied to the timeline of events questions in A12 through A24, with the appropriate modifications that would allow operators to state when the initial indication of the event occurred. PHMSA should also clarify the wording under A12 with respect to SCADA based systems. As written, an operator might interpret “SCADA based information” to mean a “SCADA alert/alarm.”

A15 (operational status): API agrees with PHMSA’s proposed question to request information on the operational status at the time the operator identified the failure. This is a useful question as operators frequently note when a pipeline has been shut-down for maintenance or resumed operations after routine shut-down following an event.

A17 (a-c), A21b: API recommends that PHMSA replace the phrase “Local/State/Federal Emergency Responder Information” with the following: “Emergency Responders (local/state/federal).”

A19 (confirmed discovery): API suggests that PHMSA define “confirmed discovery” which PHMSA proposed to define through the accident and incident notification portion of the July 15, 2015 Operator Qualification (OQ) NPRM. In comments provided in response to the OQ NPRM, API and the Association of Oil Pipe Lines proposed defining “confirmed discovery” as: “when it can be reasonably determined, based on information available to the operator at the time that a reportable event has occurred, even if only based on a preliminary evaluation.” While API recommends PHMSA adopt this definition of “confirmed discovery,” API also recommends PHMSA ensure that the reporting definition established here and the regulatory requirement set through the final OQ rule is consistent.

API recommends the following changes to Part A – Key Report Information (bold/underlined/double strikethrough):

~~A4. Local time (24-hr clock) and date of the Accident:~~

A horizontal timeline with tick marks. Below the timeline, the words "Hour", "Month", "Day", and "Year" are written in order from left to right, indicating the progression of time.

A12. formerly E7. What was the Operator's initial indication of the Accident? (select only one)

- ☐ SCADA-based ~~Program information~~ (such as alarm(s), alert(s), event(s), and/or volume calculations)
☐ Static Shut-in Test or Other Pressure or Leak Test
☐ Controller's interpretation of SCADA data
☐ Air Patrol
☐ Notification from Public
☐ Notification from Third Party that caused the Accident
- ☐ Local Operating Personnel, including contractors
☐ Ground Patrol by Operator or its contractor
☐ Notification from Emergency Responder
☐ Other _____

A13. formerly A19.a Local time Operator initially identified failure / / / / / / / / / / / / /

A17.a Did the operator communicate with Emergency Responders (local/state/federal) ~~Local, State, or Federal Emergency Responders~~ about the incident? ☐ Yes ☐ No
If No, skip A18.b and A18.c

A17.b Which party initiated communication about the accident? ☐ Operator ☐ Emergency Responders (local/state/federal)
~~Local/State/Federal Emergency Responder~~

A17.c Local time of initial Operator and Emergency Responders (local/state/federal) ~~Local/State/Federal Emergency Responder~~ communication

 / / / / / / / / / / / / /
 Hour Month Day Year

A21.b How was the fire extinguished?

☐ Operator/Contractor ☐ ~~Local/State/Federal Emergency Responder~~ Emergency Responders (local/state/federal) ☐ Allowed to burn out ☐ Other, specify: _____

Part B- Additional Location Information

In this section, PHMSA proposes adding “exposed due to loss of cover” as a selection for the area of incident when underground is selected under question B10. API agrees with the addition to B10; however API believes there should be additional questions and clarifications for B11. API requests that PHMSA add the option to select “Bored/drilled” for water crossings under B11, and it would be helpful to know, if the incident did occur at a water crossing, what the length is. The following question should be added: “Is this water crossing 100 feet or more in length from high water mark to high water mark?”

API offers the following suggested changes to Part B – Additional Location Information (bold/underlined/double strikethrough):

B11. Did the Incident Occur in a Crossing: ☐ Yes ☐ No
☐ Bridge crossing **Specify:** ☐ Cased ☐ Uncased
☐ Railroad crossing **(select all that apply) Specify:** ☐ Cased ☐ Uncased
☐ Road crossing **(select all that apply) Specify:** ☐ Cased ☐ Uncased
☐ Water crossing **Specify:** ☐ Cased ☐ Uncased
☐ **If yes, is this water crossing 100 feet or more in length from high water mark to high water mark** ☐ Yes ☐ No

If yes, Was the pipe cased? ☐ Yes ☐ No

If Yes, pipe installation method: ☐ direct install
☐ placed after assembly
☐ pulled through existing conduit
☐ bored/drilled

Part C- Additional Facility Information

In this section, PHMSA proposes modifying the selections for the items that failed as well as collecting information on plastic pipe.

While the changes to the answers for “Item Involved” are generally accepted, API recommends a few changes that will help operators further distinguish necessary details while also providing data to track trends and truly identify issues leading to facility incidents. For instance, API believes that PHMSA should keep auxiliary piping as an item listed under C3 “Item Involved in Incident.” If a failure on auxiliary piping occurs, the root cause is likely much different than a failure on a compressor or a meter, where PHMSA has proposed it be captured. This difference should be noted to help the industry improve safety. Additionally, removing auxiliary piping in this context will impact long-term trending, as industry has differentiated between it and the actual equipment for many years.

API is supportive of the sub-details listed in C4 and C5. This information will provide useful data for industry to analyze in efforts to decrease incidents.

API offers the following Part C – Additional Facility Information (bold/double strike through/highlighted in yellow):

C3. Item involved in Incident: *(select only one)*

☐ **Pipe** ⇨ Specify: ☐ Pipe Body ☐ Pipe Seam

If Pipe Body: Was this a Puddle/Spot weld? ☐ Yes ☐ No

C3.a **Nominal Pipe Size Outside Diameter (in)** ____ C3.b Wall thickness (in): ____

- ☐ Compressor, including **auxiliary piping**, connections, valves, and equipment, but excluding product drain lines and tubing.
- ☐ Meter, including **auxiliary piping**, connections, valves, and equipment, but excluding product drain lines and tubing.
- ☐ Scraper/Pig Trap, including **auxiliary piping**, connections, valves, and equipment, but excluding product drain lines and tubing
- ☐ Odorization System, including **auxiliary piping** connections, valves, and equipment, but excluding product drain lines and tubing.
- ☐ Filter/Strainer/Separator, including **auxiliary piping**, connections, valves, and equipment, but excluding product drain lines

and tubing.

- ☐ Dehydrator/Drier/Treater/Scrubber, including **auxiliary piping** connections, valves, and equipment, but excluding product drain lines and tubing.
- ☐ Regulator/Control Valve, including **auxiliary piping** connections, valves, and equipment, but excluding product drain lines and tubing.
- ☐ Pulsation Bottle or Drip/Drip Collection Device
- ☐ Cooler or Heater, including **auxiliary piping** connections, valves, and equipment, but excluding product drain lines and tubing.
- ☐ Repair Sleeve or Clamp
- ☐ Hot Tap Equipment

☐ **Stopples Fittings Tap Fittings Pipe Fitting:**

If Pipe Fitting, specify the associated item:

- ☐ **Elbow**
- ☐ **Tee**
- ☐ **Reducer**
- ☐ **Thread-o-let/Weld-o-let**
- ☐ **Pipe Nipple/Stopples**
- ☐ **Plug**
- ☐ **Other** **Please specify:**

- ☐ Flange Assembly, including Gaskets
- ☐ ESD System, including connections, valves, and equipment, but excluding product drain lines and tubing.

☐ **Auxiliary Piping**

If Aux Piping, specify the associated item:

- ☐ **Pump**
- ☐ **Meter**
- ☐ **Scraper/Pig Trap**
- ☐ **Sump**
- ☐ **Filter/Strainer/Separator**

☐ **Drain Lines**

☐ **Tubing, including Fittings**

C3.t Tubing material (select only one):

- ☐ Stainless steel
- ☐ Carbon steel
- ☐ Copper
- ☐ Other

C3.u Type of tubing (select only one):

- ☐ Rigid
- ☐ Flexible

☐ **Instrumentation, including Programmable Logic Controllers and Controls**

☐ **Underground Gas Storage or Cavern**

☐ **Other**

Part D – Additional Consequence Information

In this section, PHMSA proposes new questions relating to injury severity categories, the volume of product consumed by fire, the number of buildings impacted by the incident, and the length of building evacuations.

D8 & D9 (persons with injuries): API suggests that questions D8 and D9 on persons sustaining injuries, but are not listed in A11, be combined into one question that simply requires operators to list the number of individuals who sustained an Occupational Safety and Health Administration (OSHA) recordable incident. As written, the questions are not clear and could

lead to misinterpretation. PHMSA should leverage existing federal requirements where appropriate.

D10 & D11 (buildings affected): PHMSA instructions specify "affected," which could be interpreted to mean any building either damaged or evacuated due to the release. API suggests adding the words "Evacuated or Required Repair" next to "Buildings Affected."

API offers the following changes to Part D – Additional Consequence Information (bold/underlined/double strikethrough):

~~D8. Number of persons with injuries requiring treatment in a medical facility but not requiring overnight in-patient hospitalization:~~

~~If a person is included in D8, do not include them in D9.~~

~~D9. Number of persons with injuries requiring treatment by EMTs at the site of incident:~~

D8. Number of Occupational Safety and Health Administration (OSHA) recordable incidents_____

If a person is included in D8, do not include them in D9.

~~D9. Number of persons with injuries requiring treatment by EMTs at the site of incident:~~

Buildings Affected

~~D4~~9. Number of residential buildings affected (evacuated or required repair):_____

~~D4~~10. Number of business buildings affected (evacuated or required repair):_____

Part E – Additional Operating Information (LD Systems)

In this section, PHMSA proposes to add questions relating to gas flow at the time of the incident, if the gas was odorized, and clarifications to questions on the length and function of the pipeline system. API supports these additions.

Under question E10, however, API requests that PHMSA clarify what is meant by "detection" and "confirmation." API suggests adding wording similar to the language proposed for Part A. This will ensure that operators are more consistent in their responses.

~~E10 formerly E6.~~ Was a Supervisory Control and Data Acquisition (SCADA)-based system in place on the pipeline or facility involved in the Accident?

☐ No

☐ Yes ☐

~~E6~~10.a Was it operating at the time of the Accident?

☐ Yes

☐ No

~~E6~~10.b Was it fully functional at the time of the Accident?

☐ Yes

☐ No

~~E6~~10.c Did SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the initial indication ~~detection~~ of the Accident?

☐ Yes

☐ No

~~E6~~10.d Did SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the confirmed discovery of the Accident?

☐ Yes

☐ No

G1 – Corrosion Failure

API is grateful for PHMSA’s additional clarification question on the type of stray current corrosion. With this information, trends in these incidents can be analyzed to mitigate instances of these failures.

G3 – Excavation Damage

API appreciates the proposal for additional data about exemptions from state damage prevention laws when the cause of the incident is excavation damage. API agrees that data would help stakeholders determine states in which damage prevention law exemptions may be leading to more frequent excavation damage of pipelines. This information could also provide data to PHMSA to help show the value of state damage prevention laws. API supports any efforts to improve state and local damage prevention regulations.

G4 – Other Outside Force Damage

In this section, PHMSA proposes to determine outside force sub-causes and requests additional information about driver performance and protection from damage when the cause is identified as “damage by car, truck, or other motorized vehicle/equipment not engaged in excavation.” PHMSA also proposes to request information such as whether the driver violated state or local driving laws, whether they were in control of the vehicle at the time of the collision, and the estimated speed at time of collision.

PHMSA should understand that in certain cases, such as a “hit and run,” operators may not be able to answer all the questions following the “G4 – Other Outside Force Damage” section or obtain this information from law enforcement officials. There should be clarification on how to complete the incident form in those situations. Also, API asks that a statement be added to ensure operators are aware they need to complete questions 5 through 11. See below for recommended addition:

<input type="checkbox"/> Damage by Car, Truck, or Other Motorized Vehicle/Equipment NOT Engaged in Excavation	1. Vehicle/Equipment operated by: <i>(select only one)</i> <input type="radio"/> Operator <input type="radio"/> Operator's Contractor <input type="radio"/> Third Party If this sub-cause is picked, please complete questions 5-11 below.
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G5 – Material Failure of Pipe or Weld

In this section, PHMSA requires the selection of a sub-cause when material failure of pipe or weld causes the incident. PHMSA has proposed adding “Design” to the “Construction-, Installation-, or Fabrication-related” sub-cause to reduce the number of causes listed as “other.”

PHMSA also adds another environmental cracking option, “hard spot,” again to reduce the selection of “other.” Finally, PHMSA includes a question to collect the post-construction pressure test value.

In the instructions accompanying the incident form, PHMSA’s uses the term, “improper design practices,” when describing how to complete section G5. However, this term is not defined, so it is unclear what PHMSA believes is a “Design-related” material failure of pipe or weld. API requests PHMSA provide examples or give clarification, which will ensure operators properly differentiate between the answers needed under “G7- Incorrect Operation” and those required in this category.

G6- Equipment Failure

Under this section, PHMSA proposes minor adjustments by adding two additional factors (improper maintenance and erosion/abnormal wear) that may contribute to equipment failure. The use of the factor “erosion/abnormal wear” is not clear. API requests that PHMSA clarify what is meant by this latter addition. Erosion and abnormal wear is a very broad term, but is an important sub-cause to capture for analyses of incident trends. Not providing the proper clarification could confuse operators, causing them to just check “Other.”

Part J – Integrity Inspections

Under this section, PHMSA proposes collecting additional inspection data to provide insights about the effectiveness of the various types of tools. API suggests that PHMSA update their list with more specific tools and in-line inspection (ILI) technology that is currently available.

API offers the following changes to Part J – Integrity Inspections
(bold/underlined/strikethrough):

	year of most recent run	year of previous run
⊖ Magnetic Flux Leakage Tool	/ / / / /	/ / / / /
⊖ Ultrasonic	/ / / / /	/ / / / /
⊖ Geometry	/ / / / /	/ / / / /
⊖ Caliper	/ / / / /	/ / / / /
⊖ Crack	/ / / / /	/ / / / /
⊖ Hard Spot	/ / / / /	/ / / / /
⊖ Combination Tool	/ / / / /	/ / / / /
⊖ Transverse Field/Triaxial	/ / / / /	/ / / / /
⊖ Camera Tool	/ / / / /	/ / / / /
⊖ Other, specify tool:	/ / / / /	/ / / / /

year of most recent run

year of previous run

Tool propulsion system:

- ☐ **Free swimming** / / / / / / / / / /
- ☐ **Tethered** / / / / / / / / / /

Tool Technology

- ☐ **Axial MFL** / / / / / / / / / /
- ☐ **Spiral/Helical MFL** / / / / / / / / / /
- ☐ **Circumferential/ Transverse Wave MFL** / / / / / / / / / /
- For each MFL tool selected specify ☐ Extra High Resolution ☐ High Resolution ☐ Standard/Low Resolution**
- ☐ **Ultrasonic** / / / / / / / / / /
- Was the UT tool attuned to detect ☐ Crack ☐ Wall Measurement**
- ☐ **Geometry** / / / / / / / / / /
- Was the Geometry tool ☐ Mechanical ☐ Electromagnetic**
- ☐ **EMAT** / / / / / / / / / /
- ☐ **Hard Spot** / / / / / / / / / /
- ☐ **Camera** / / / / / / / / / /
- ☐ **Inertial Navigation** / / / / / / / / / /
- ☐ **CPCM** / / / / / / / / / /
- ☐ **Other, specify tool:** _____ / / / / / / / / / /

***Magnetic Flux Leakage Tool (MFL)**

***Electromagnetic Acoustic Transducer (EMAT)**

***Cathodic Protection Current Measurement (CPCM)**

Part K - Contributing Factors

PHMSA proposes to collect information on multiple root causes. API believes that this addition will be a useful section for operators to provide information on the multiple factors that may have led to an unintentional release.