



ADVISORIES
BULLETINS
&
ALERT NOTICES

NEBRASKA STATE FIRE MARSHAL
AGENCY – PIPELINE DIVISION

FEBRUARY 2025

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ADVISORY BULLETIN ON HARD SPOTS

PHMSA HAS ISSUED AN ADVISORY BULLETIN ADB-2024-1 TOO ALERT PIPELINE OWNERS AND OPERATORS ABOUT THE RISKS ASSOCIATED WITH “HARD SPOTS” IN PIPELINES, PARTICULARLY THOSE USING PIPE MANUFACTURED PRE-1970.

PLATE AND PIPE MANUFACTURING

BROADER THAN PREVIOUSLY UNDERSTOOD

CONSIDER EXPANDING THREAT EVALUATION

REGARDLESS OF MANUFACTURER

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ADDENDUM 4 OF THE 2022 EDITION OF THE GPTC (GAS PIPING TECHNOLOGY COMMITTEE) GUIDE.

LEAK DETECTION AND REPAIR

PIPELINE INTEGRITY MANAGEMENT

VALVE SAFETY

EMERGENCY RESPONSE

A COPY OF THE ADDENDUM CAN BE FOUND AT THE GPTC WEBSITE

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- **FAQS: OPERATOR QUALIFICATIONS**
- **OUTDATED INFORMATION REMOVED**
- **REMOVED OR REPLACED QUESTIONS THAT WERE NO LONGER APPLICABLE TO CURRENT OQ REGULATIONS, PARTICULARLY THOSE THAT MIGHT HAVE BEEN CONFUSING FOR EMERGENCY RESPONDERS.**
- **CLEARER REGULATORY LINKAGE**
- **EACH FAQ IS NOW DIRECTLY LINKED TO A SPECIFIC SECTION OF THE PHMSA REGULATIONS, ALLOWING FOR EASIER INTERPRETATION AND COMPLIANCE.**
- **FOCUS ON RELEVANT INFORMATION**
- **THE UPDATED FAQS PRIORITIZE INFORMATION MOST CRUCIAL FOR EMERGENCY RESPONDERS TO UNDERSTAND REGARDING OPERATOR QUALIFICATIONS AND THEIR ROLE IN PIPELINE SAFETY INCIDENTS.**

SO WHAT CAN THE F.D. DO?

- WITHOUT OQ THE F.D. “CAN” SHUT A VALVE AT THE METER.
 - NO CLAMPS!
 - CLAMPING REQUIRES OQ.

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RANDOM DRUG TESTING RATES FOR 2025 WILL BE 50%

**MINIMUM RANDOM DRUG TESTING RATE FOR COVERED EMPLOYEES WILL INCREASE
FROM 25% TO 50% IN 2025.**

EFFECTIVE JANUARY 1, 2025

PROCEDURES FOR TRANSPORTATION WORKPLACE DRUG AND ALCOHOL TESTING PROGRAMS

ORAL FLUID TESTING (SALIVA TESTING)

**PHMSA HAS RECOGNIZED ORAL FLUID TESTING AS AN ACCEPTABLE
ALTERNATIVE TO URINE TESTING**

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PHMSA REVISED FORMS:

INCIDENT/ACCIDENT REPORTS

Property Damage Threshold changed to \$145,400 (July 1, 2024)

GAS DISTRIBUTION ANNUAL REPORT

PART D (EXCAVATION DAMAGE ROOT CAUSE OPTIONS)

EXPANDED TO ALLOW FOR MORE DETAILED ANALYSIS

OPID REQUEST

LIST PREVIOUS OPIDs

CONTACT INFORMATION FOR INSPECTION SCHEDULING

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EXPANDING ON PART D

- **IF USING THE “OTHER” BOX FOR THE CAUSE OF DAMAGE**
 - **YOU WILL BE ASKED FOR DOCUMENTATION ON WHY “OTHER” IS RELEVANT.**

THIS IS A PHMSA HOT BUTTON!!!

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AMENDMENT 192-135 & 192-137: PERIODIC UPDATES OF REGULATORY REFERENCES TO TECHNICAL STANDARDS AND MISCELLANEOUS AMENDMENTS (LIMITED ENFORCEMENT DISCRETION – 1/2025)

- **DOCUMENTS INCORPORATED BY REFERENCE:**
 - **API, ASME/ANSI, AND ASTM STANDARDS AND SPECIFICATION INVOLVING STEEL PIPE, FLANGES AND VALVES.**
 - **API STANDARD 1104 21ST EDITION - WELDING**
 - **ASME B31.8-2018 GAS TRANSMISSION AND DISTRIBUTION PIPING SYSTEMS**
 - **ASME B31.8S-2004 SUPPLEMENT TO B31.8 ON MANAGING SYSTEM INTEGRITY OF GAS PIPELINES**
 - **NFPA 70, NATIONAL ELECTRIC CODE 2017 EDITION**
- **PETROLEUM GAS PLANTS SUPPLYING DISTRIBUTION SYSTEMS**
- **DESIGN FACTORS FOR STEEL AND PLASTIC PIPE**
- **VARIOUS CORRECTIONS EDITORIAL IN NATURE**
- **ABANDONMENT OR DEACTIVATION OF FACILITIES**

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**AMENDMENT 192-136: CORRECTION AMENDMENTS & RESPONSE TO
PETITION FOR RECONSIDERATION OF VALVE INSTALLATION AND
MINIMUM RUPTURE DETECTION STANDARDS**

- **REMOVED THE RUPTURE VALVE REQUIREMENTS FROM TYPE A GATHERING LINES.**

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NOTICE DC COURT DECISION REGARDING AMDT.
192-132

- **PHMSA PUBLISHED REVISED RULES ON JANUARY 15, 2025**
- **VACATED**
 - **MONITORING AND MITIGATION OF INTERNAL CORROSIVE CONSTITUENTS**
 - **IMMEDIATE REPAIR CRITERION FOR CRACKS OR CRACK-LIKE ANOMALIES WITH PREDICTED FAILURE PRESSURES BELOW $1.25 \times \text{MAOP}$**
 - **HIGH-FREQUENCY ELECTRIC RESISTANCE WELDED SEAMS AS ONE OF THE SEAM TYPES QUALIFYING FOR THE IMMEDIATE REPAIR CRITERION OF PREFERENTIAL METAL LOSS ON CERTAIN SEAM TYPES.**

WHAT DIDN'T HAPPEN IN 2024

- **LEAK DETECTION FINAL RULE— ADVANCED REVIEW PROVIDED JANUARY 17, 2025**
- **COST RECOVERY FOR SITING REVIEWS FOR LNG FACILITIES**
- **PERIODIC STANDARDS UPDATE PART II (PROPOSED AUGUST 2022)**
- **GAS DISTRIBUTION RULE REVISIONS TO 192 IN RESPONSE TO COURT DECISION ON AMENDMENT 192-132 – PUBLISHED JANUARY 15, 2025**
- **CLASS LOCATION RULE CHANGE**

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ADVANCED LEAK DETECTION IS ON THE BACKBURNER.

- **FOR HOW LONG WE DON'T KNOW?**
- **THAT BEING SAID...**
- **WE ENCOURAGE BEST PRACTICES ON PREVENTING EXCESSIVE GAS ESCAPE BY ALL STAKEHOLDERS.**
- **LET'S LOOK UNDER THE HOOD.**

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ADVANCED LEAK DETECTION – ADVANCED COPY

- **INCIDENT DEFINITION – COST TO REMOVE AND REPLACE NON-OPERATOR INFRASTRUCTURE NOT INCLUDED IN ESTIMATED PROPERTY DAMAGE**
- **ANNUAL REPORT DUE DATES – TRANSMISSION JUNE 15 AND DISTRIBUTION MAY 15**
- **LARGE VOLUME GAS RELEASE REPORT (500,000 CUBIC FEET)**
- **DEFINED CONFINED SPACE, LOWER EXPLOSIVE LIMIT, SUBSTRUCTURE, TUNNEL, WALL-TO-WALL PAVED AREAS.**
- **TYPE B AND TYPE C GATHERING LINE REQUIREMENTS**
- **UNDERGROUND STORAGE PROCEDURE MANUAL.**

ADVANCED LEAK DETECTION – CONT.

- **REGULATOR STATION DESIGN AND CONFIGURATION – MINIMIZE RELEASES, ISOLATION VALVE FOR TESTING**
- **UPDATE O&M FOR LEAK REPAIR SCHEDULE**
- **FAILURE DEFINITION TO INCLUDE STILL OPERABLE BUT NOT PERFORMING SATISFACTORILY**
- **LEAK GRADING SPECIFICATION**
- **STANDARD IS 5-YEAR LEAK SURVEY UNLESS**
 - **1 YEAR FOR BUSINESS DISTRICTS**
 - **1 YEAR FOR CATHODICALLY UNPROTECTED PIPELINES**
 - **1 YEAR FOR KNOWN MATERIALS (CAST IRON, UNPROTECTED STEEL, HISTORIC PLASTIC)**
 - **1 YEAR FOR DOWN CATHODIC ZONES**
 - **EXTREME WEATHER OR NATURAL DISASTERS**

ADVANCED LEAK DETECTION – CONT.

- **PRESSURE LIMITING AND REGULATING STATIONS: INSPECTION AND TESTING – ADDITIONAL LANGUAGE REGARDING MALFUNCTIONS**
- **LEAK REPAIR**
 - **GRADE 1 – IMMEDIATE**
 - **GRADE 2 – 12 MONTHS (OR REPLACED IN 24 MONTHS)**
 - **GRADE 3 – 36 MONTHS (OR REPLACEMENT IN 84 MONTHS)**
- **POST REPAIR CHECK 14-30 DAYS AFTER REPAIR <1%LEL OR 500 PPM (>1% NEED ANOTHER CHECK WITHIN 30 DAYS AND ADDITIONAL FOLLOW-UP)**
 - **NOT REQUIRED FOR**
 - **ROUTINE MAINTENANCE WORK (GREASING A VALVE)**
 - **REPLACEMENT OF PERMANENT ABANDONMENT OF LEAKING PIPELINE**
 - **CAN BE DONE IMMEDIATELY FOR**
 - **ABOVE GROUND FACILITIES**
 - **GRADE 3 REPAIRS**
 - **EXCAVATION DAMAGE WHEN EXTENT OF DAMAGE KNOWN**

ADVANCED LEAK DETECTION – CONT.

- **ADVANCE LEAK DETECTION PROGRAM**
 - **LEAK DETECTION EQUIPMENT**
 - **LEAK DETECTION PROCEDURE**
 - **PERFORMING LEAK SURVEYS**
 - **PINPOINTING LEAKS**
 - **SCREENING SURVEYS**
 - **INFRARED OR LASER-BASED LEAK DETECTION EQUIPMENT**
 - **MOBILE, AERIAL OR SATELLITE-BASED PLATFORMS**
 - **OR FIXED CONTINUOUS MONITORING SENSORS**
 - **MAINTAINING AND CALIBRATING LEAK DETECTION EQUIPMENT**
 - **PERIODIC EVALUATION AND IMPROVEMENT**

ADVANCED LEAK DETECTION – CONT.

- **ADVANCED LEAK PROTECTION PERFORMANCE STANDARD**
 - **TRANSMISSION (SCREENING FLOW RATE DETECTION 10KG/HR WITH 90% PROBABILITY, 5 PPM SENSITIVITY FOR LEAK SURVEY)**
 - **DISTRIBUTION (SCREENING FLOW RATE DETECTION .2KG/HR WITH 90% PROBABILITY, 5 PPM SENSITIVITY FOR LEAK SURVEY, 1% LEL/500 PPM FOR ABOVE GROUND)**

ADVANCED LEAK DETECTION – CONT.

- **TRANSMISSION PIPELINE BLOWDOWNS**
- **TRACK NUMBER OF LEAKS ELIMINATED OR REPAIRED INCLUDING LEAKS REPAIRED WHEN FOUND.**
- **MOBILE AND TEMPORARY LNG FACILITIES REGULATIONS**

[CLICK HERE OFTEN!!!](#)

OTHER PHMSA NEWS

- **TRUMP ADMINISTRATION PUT A HOLD ON ALL RULEMAKING –THE ADVANCED COPIES OF LDAR AND CO2 MIGHT BE PULLED OFF THE WEBSITE.**
- **EXPECT A SLOWER PROCESS FOR GETTING NEW REGULATIONS.**
- **THE WAIVER OF BUILD BACK AMERICA ACT FOR GAS REGULATORS, RISERS, AND METERS HAS BEEN OFFICIALLY PUBLISHED IN THE FEDERAL REGISTER.**
 - **THIS EXEMPTS OPERATORS WHO GOT THE BIL GRANTS FROM DELAYS IF US MADE PARTS ARE NOT AVAILABLE.**

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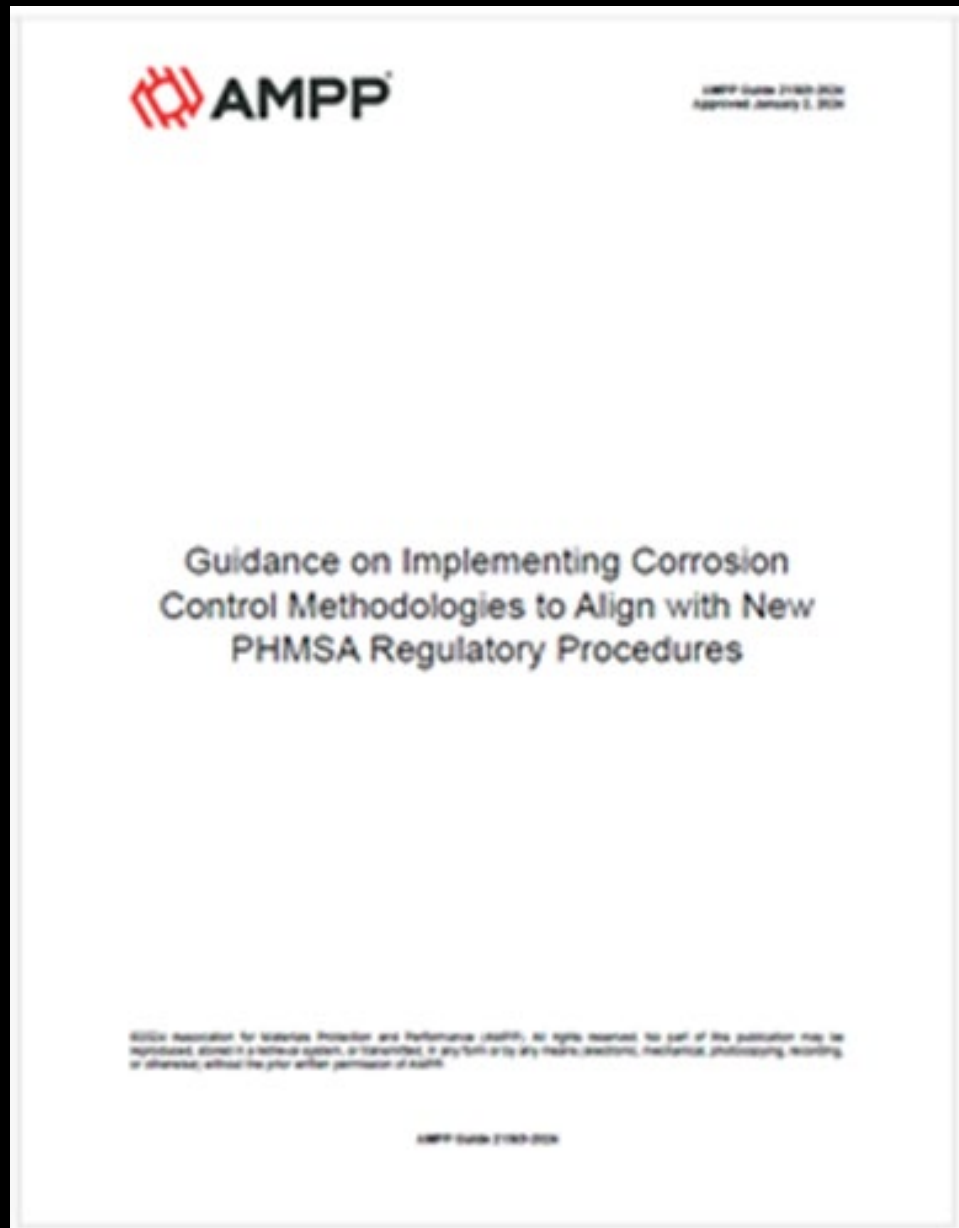
AMPP STANDARDS INCORPORATED
BY REFERENCE BY PHMSA

192.7

PART 192

- NACE SP0102-2010, “IN-LINE INSPECTION OF PIPELINES”
 - §§ 192.150(A) AND 192.493.
- NACE SP0204-2008, “STRESS CORROSION CRACKING (SCC) DIRECT ASSESSMENT METHODOLOGY”
 - §§ 192.923(B); 192.929(B) INTRODUCTORY TEXT, (B)(1) THROUGH (3), (B)(5) INTRODUCTORY TEXT, AND (B)(5)(I).
- NACE SP0206-2006, “INTERNAL CORROSION DIRECT ASSESSMENT METHODOLOGY FOR PIPELINES CARRYING NORMALLY DRY NATURAL GAS (DG-ICDA)”
 - §§ 192.923(B); 192.927(B), (C) INTRODUCTORY TEXT, AND (C)(1) THROUGH (4).
- ANSI/NACE SP0502-2010, “PIPELINE EXTERNAL CORROSION DIRECT ASSESSMENT METHODOLOGY”
 - §§ 192.319(F); 192.461(H); 192.923(B); 192.925(B); 192.931(D); 192.935(B); AND 192.939(A).

**AMPP GUIDE 21569-2024,
PAY PER ACCESS
GUIDANCE ON
IMPLEMENTING
CORROSION CONTROL
METHODOLOGIES TO
ALIGN WITH NEW PHMSA
REGULATORY PROCEDURES
– PROVIDES ADDITIONAL
GUIDANCE FOR PIPELINE
OPERATORS TO ASSIST
WITH THE IMPLEMENTATION
OF CORROSION CONTROL
METHODOLOGY
REQUIREMENTS FOR
ONSHORE GAS
TRANSMISSION AS
REQUIRED IN PART 2 OF
THE PHMSA GAS MEGA
RULE.**



!!!...THANK YOU...!!!

PRESENTERS
OPERATORS
CONTRACTORS
VENDORS
&
STAKEHOLDERS

-REGARDS, NSFM AGENCY