



DOT PHMSA R&D Forum

Industry Topics for Discussion



Topics of Conversation

- Updates to 49 CFR Part 193
- Guidance on PHMSA inspections / 193 compliance
- Pipe in Pipe technology options
- Release durations for impoundment sump sizing and design spills

Updates to 49 CFR Part 193

- PHMSA and FERC involved in 2019 version of NFPA 59A
- Major updates to siting to match PHMSA's FAQ
- Major updates to small scale chapter
 - Help with siting small scale facilities
- Major updates to Risk Based Siting (QRA) Chapter
 - Alternative measure for siting LNG facilities
- PHMSA's plan to update 49 CFR Part 193?
 - Workshop in Washington DC May 18-19, 2016
 - Discussed at R&D Forum Sept 2018

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Guidance on PHMSA Inspections / Code Compliance

- PHMSA regions perform inspections based on geographic location
- Some inspectors may review compliance with certain 193 requirements differently
 - How to test control systems
 - How to test input/output signal functionality
 - Full vs partial stroke
 - Keeping up to date with DC HQ approvals
- Enforcement guidance for operators on what each requirement in 49 CFR Part 193 means?
- Guidance for inspectors to ensure consistent compliance requirements?
- Alignment with PHMSA inspectors and industry on requirements?

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Guidance on PHMSA Inspections / Code Compliance

- Guidance document on PHMSA process for verifying 193 compliance during construction
 - Engineering/construction typically done from ground up
 - Design basis, piles, foundations, structures, equipment and components, commissioning, operations and ma
- Ability to ask “anonymous” questions without impacting construction schedules?

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Pipe In Pipe Technology Options

- Projects want to use, but unsure of Special Permit process with PHMSA
- Equivalency option?
- How to site?
 - Disconnect between PHMSA FAQ and NFPA 59A (2019)
- What technologies will PHMSA allow?
 - Expansion bellows?
 - Inner piping materials?
 - Outer piping materials?
- Guidance from PHMSA on what the process for approval is and what will be accepted?

Release Durations for impoundment sump sizing and design spills

- MOU with FERC and PHMSA
 - Who has sump sizing and design spill jurisdiction?
 - PHMSA/USCG approve but FERC deny
- NFPA 59A (2001) 2.2.2.2 allows for impoundments to be sized for a 10 minute spill or shorter based on surveillance and shutdown provisions
 - What are acceptable surveillance and shutdown provisions?
 - How to document those provisions?
 - Guidance that if company has X detection, with Y shutdown in Z duration, PHMSA will accept “?” minute spill sizing criteria.