



Part 191 Reporting Requirements for Natural Gas Pipelines

Part 191

This Part prescribes requirements for the REPORTING of:

- Incidents
- Safety Related Conditions
- Annual Pipeline Summary Data
- Other Reporting Requirements



Incident:

- Release of Gas - - "and"
 - Death
 - Hospitalization Injury
 - \$50,000 Property Damage
 - Estimated gas loss of 3 million cubic feet (3,000 mcf) or more

Incident:



Emergency Shutdown of an LNG Facility

Incident:

Significant in
Judgment of
the Operator



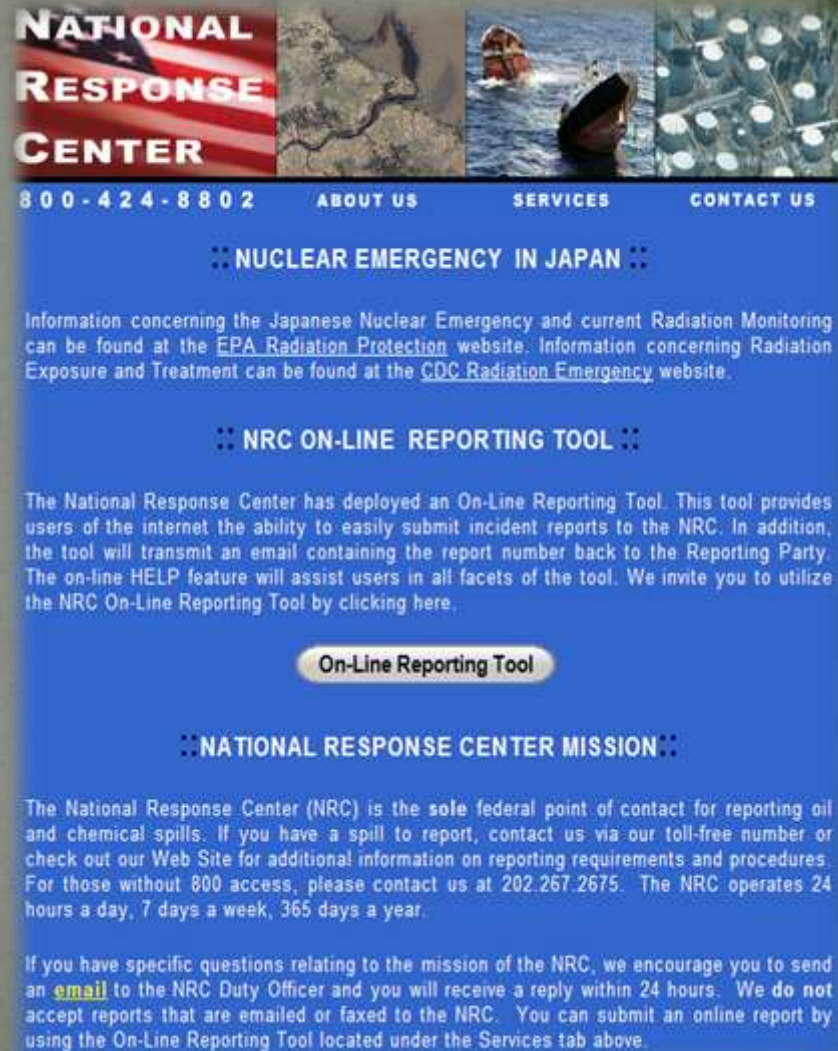
Other State Requirements

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

- **Activate Emergency Response Plan**
- **Notify the NRC as soon as practicable**

Immediate Notification

- National Response Center
- 1-800-424-8802
- Electronically at www.nrc.uscg.mil
- State notification may also be required



NATIONAL RESPONSE CENTER

8 0 0 - 4 2 4 - 8 8 0 2 ABOUT US SERVICES CONTACT US

⌘ NUCLEAR EMERGENCY IN JAPAN ⌘

Information concerning the Japanese Nuclear Emergency and current Radiation Monitoring can be found at the [EPA Radiation Protection](#) website. Information concerning Radiation Exposure and Treatment can be found at the [CDC Radiation Emergency](#) website.

⌘ NRC ON-LINE REPORTING TOOL ⌘

The National Response Center has deployed an On-Line Reporting Tool. This tool provides users of the internet the ability to easily submit incident reports to the NRC. In addition, the tool will transmit an email containing the report number back to the Reporting Party. The on-line HELP feature will assist users in all facets of the tool. We invite you to utilize the NRC On-Line Reporting Tool by clicking here.

[On-Line Reporting Tool](#)

⌘ NATIONAL RESPONSE CENTER MISSION ⌘

The National Response Center (NRC) is the sole federal point of contact for reporting oil and chemical spills. If you have a spill to report, contact us via our toll-free number or check out our Web Site for additional information on reporting requirements and procedures. For those without 800 access, please contact us at 202.267.2675. The NRC operates 24 hours a day, 7 days a week, 365 days a year.

If you have specific questions relating to the mission of the NRC, we encourage you to send an [email](#) to the NRC Duty Officer and you will receive a reply within 24 hours. We do not accept reports that are emailed or faxed to the NRC. You can submit an online report by using the On-Line Reporting Tool located under the Services tab above.

Post-Incident

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

Not an Incident?

- NRC reports cannot be rescinded
- No 30 day report required
- Courtesy call to PHMSA or appropriate State Agency



Report Submission

§191.7 states each report required by this section must be submitted electronically

Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

OPS Online Data Entry and Operator Registration System

[OPS Home](#) | [ODES Main](#) | [Contact Information](#)

Operator Registration

- You must have an OPS provided Operator ID and Personal Identification Number(PIN) to submit reports using this system.
- If you are not sure if you are an operator, you can [read more information about Operators](#) or [search our database](#).
- If you do not have an Operator ID, you can [request an Operator ID](#).
- If you have an Operator ID but do not have a PIN, you can [request a PIN](#).
- If you have a PIN and would like to change it, you can [change your PIN](#).

On-Line Data Entry

Gas Transmission and Gathering Systems			
▶	Incident Report Gas Transmission & Gathering Systems	PHMSA F 7100.2	01/02
▶	Annual Gas Transmission & Gathering System	PHMSA F 7100.2-1	12/05
Gas Distribution Systems			
▶	Incident Report - Gas Distribution Systems	PHMSA F 7100.1	03/04
▶	Annual Gas Distribution System	PHMSA F 7100.1-1	12/05
Hazardous Liquid Pipeline Systems			
▶	Accident Report Hazardous Liquid Pipeline Systems	PHMSA F 7000.1	01/01
▶	Annual Hazardous Liquid or Carbon Dioxide Systems	PHMSA F 7000.1-1	03/07
Gas Integrity Management			
▶	Gas Integrity Management Reporting		
Public Awareness Program Clearinghouse Submittal			
▶	Public Awareness Program Clearinghouse Submittal		
	OPS has ceased collecting public awareness programs. If you have any questions, please contact Blaine Keener at 202-366-0970 or blaine.keener@dot.gov .		

<https://opsweb.phmsa.dot.gov>

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 an alternative reporting method.

Report Submission

- May still be required to file a written report with your state regulatory agency!
- On line filing will **NOT** automatically send a copy to the state

Annual Reports

Due on March 15 for Preceding CY

§191.11- Distribution
§191.12 – Distribution
Systems: Mechanical
Fitting Failure Reports
§ 191.17 – Transmission,
gathering, and LNG



EXEMPT:

- **LPG System < 100 customers**
- **Master meter operators**

Transmission Reports

- Separate form for each commodity the operator carries
- Parts A – E are to be completed once for each OPID commodity group annual report, covering ALL of the pipelines and/or facilities
- Parts F – M are to be reported separately for Interstate and for Intrastate facilities, or by state, according to instructions

Transmission Reports

- IM required reporting (§192.945) now part of annual report
- Parts F – Integrity Inspections during year and actions take
- Subpart - G – Miles of baseline assessment and reassessment

Annual Reports

- Make sure there is an entry in each block for which data is available
 - Avoid entering unknown or zero(0) except where 0 is appropriate
 - Report by mileage,
 - <1 mile report to the nearest 1/10 of mile
 - Do not use fractions
 - >1 mile, round all mileages

Distribution Reports

- Separate Form for each State in Which System Operates
- “Part B” is system description, including
 - Miles of mains and services,
 - Materials,
 - Line sizes,
 - Number of services,
 - Decade of installation

Annual Report

§192.1007 (g)

Report, on an annual basis, the four measures listed in paragraphs (e)(1)(i) through (e)(1)(iv) of this section, as part of the annual report required by § 191.11.

An operator also must report the four measures to the state pipeline safety authority if a state exercises jurisdiction over the operator's pipeline.

§192.1007 (e)

- (i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
- (ii) Number of excavation damages;
- (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
- (iv) Total number of leaks either eliminated or repaired, categorized by cause;

Distribution Reports

- Part C aligns with IM requirements for reporting total leaks eliminated or repaired
 - Both total leaks and hazardous leaks
- Align with IM Requirements
 - Corrosion
 - Natural Forces
 - Excavation
 - Other Outside Force Damage
 - Material and Welds
 - Equipment
 - Incorrect Operations
 - Other

Definition of a "Leak"

- Unintentional Escape of Gas from the Pipeline
Test Failures Not Included
- A Non-Hazardous Release that can be Eliminated by Lubrication, Adjustment, or Tightening is **Not** a Leak
- Hazardous Leak means a leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous. (§192.1001)

Gas Distribution Annual Report Form

PART-C -- TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING YEAR

CAUSE OF LEAK				
	Mains		Services	
	Total	Hazardous	Total	Hazardous
CORROSION				
NATURAL FORCES				
EXCAVATION DAMAGE				
OTHER OUTSIDE FORCE DAMAGE				
MATERIAL OR WELDS				
EQUIPMENT				
INCORRECT OPERATIONS				
OTHER				

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR: _____

PART-D -- EXCAVATION DAMAGE

Number of Excavation Damages: _____

Number of Excavation Tickets: _____

PART-E -- EXCESS FLOW VALVE (EFV) DATA

Total Number of EFVs on Single-family Residential Services Installed During Year: _____

Estimated Number of EFVs In System At End Of Year: _____

Distribution Reports

- IM reporting requirements (§192.1007(e)) have been added to form
 - Part D Excavation tickets and damage
- §192.383 (c) Excess flow valves
Each operator must report the EFV measures detailed in the annual report required by § 191.11

Excess Flow Valves

- Report two numbers:
 - **Estimated** number of EFVs in system
 - Cumulative number
 - Add current year to last years number
 - Understand accuracy issues
 - Total number installed during past year

Distribution Reports

- Avoid entering any data in the **UNKNOWN** columns
- Round all mileage to the nearest 3 decimal positions
 - **DO NOT USE FRACTIONS**
 - $3/8 = 0.375$; $1/2 = 0.5$, $3/4 = 0.75$
- Total miles of main/services in Part B sections 1 through 4 **MUST** all sum to the same totals in the appropriate rows.

Report Submission

- Confirmation message will appear that confirms a record has been successfully submitted.
- To save or print a copy of your submission, go to **Submitted Reports**
 - **PDF format**
- Send a copy of the report to the State agency no later than March 15th

§191.12 Distribution Systems. Mechanical Fitting Failure Reports

- Each mechanical fitting failure, as required by § 192.1009, must be submitted on a Mechanical Fitting Failure Report Form PHMSA F- 7100.1-2.
- Report by either
 - Submit reports throughout the year
 - All reports not later than March 15 of the following year

Mechanical Fitting

§192.1001

- Mechanical fitting means a mechanical device used to connect sections of pipe. The term "Mechanical fitting" applies only to:
 - (1) Stab Type fittings;
 - (2) Nut Follower Type fittings;
 - (3) Bolted Type fittings; or
 - (4) Other Compression Type fittings

§ 191.22 National Registry of Pipeline Operators

(a) OPID Request. Each operator of a gas pipeline, gas pipeline facility, ...must obtain from PHMSA an Operator Identification Number (OPID).

This requirement applies to all new and existing operators, including operators who have already been assigned one or more OPID.

§ 191.22 National Registry of Pipeline Operators

The requirement to request an OPID still does **not apply** to master meter and small LPG operators in existence prior to December 31, 2011.

Operators who came into existence after Dec 31, 2011 are required to request an OPID number.

OPID's must be requested online at:

<http://opsweb.phmsa.dot.gov>

§ 191.22 National Registry of Pipeline Operators

(b) Changes. ... through the National Registry of Pipeline and LNG ... at

<http://opsweb.phmsa.dot.gov>

60 days prior to any of the following events:

Notification 60 days prior

- (i) Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs \$10 million or more. If 60 day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;
- (ii) Construction of 10 or more miles of a new pipeline; or
- (iii) Construction of a new LNG plant or LNG facility.

Report within 60 days after

- (i) A change in the primary entity responsible (i.e., with an assigned OPID) for managing or administering a safety program required by this part covering pipeline facilities operated under multiple OPIDs.
- (ii) A change in the name of the operator;

Report within 60 days after

- (iii) A change in the entity (e.g., company, municipality) responsible for an existing pipeline, pipeline segment, pipeline facility, or LNG facility;
- (iv) The acquisition or divestiture of 50 or more miles of a pipeline or pipeline system subject to Part 192 of this subchapter; or
- (v) The acquisition or divestiture of an existing LNG plant or LNG facility subject to Part 193 of this subchapter.

Summary for Reporting Requirements of Part 191

- Have written procedures
- Have the OPID, forms and information available
- Work with regulatory agencies
- Review process and work
- Check for completeness and accuracy
- File on time
- Turn in supplemental reports as required

Information Websites

PHMSA Training and Qualification

<http://www.phmsa.dot.gov/pipeline/tq>

PHMSA Pipeline Forms and Instructions

<http://phmsa.dot.gov/pipeline/library/forms>

PHMSA Online Reporting

<http://opsweb.phmsa.dot.gov/cfdocs/opsapps/pipes/main.cfm>