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**April 20, 2016**

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**Technical Assistance Grant No. DTPH5615GPPT21**

### **Mid Term Progress report**

The Department of Transportation, Pipeline and Hazardous Material Safety Administration (PHMSA) awarded the Pipeline Safety Trust a Technical Assistance Grant to provide the public with more tools so they better understand how pipeline safety rules are created, and give them the knowledge and opportunity to more fully participate in official proceedings such as rulemakings, workshops, standard development, and other local, regional, or national proceedings related to pipeline safety.

The expected program outputs from the grant proposal are each stated below, with discussion of the work performed during the first half of the grant period following each expected output.

#### **1. Helping local government and citizens understand the regulatory process by creating a new Citizen's Guide to How Pipeline Safety Rules Are Made**

Drafting of the Guide is nearly complete as of this writing, but due to the publication of the two major proposed rules from PHMSA and some additional state rulemaking proceedings we intend to provide comments on, we anticipate a slight delay from our proposed publication date of May 2016. We expect to complete the Guide's writing and layout and publish it within a few weeks after the comment deadline on the Safety of Natural Gas Transmission and Gathering lines rule (June 7).

#### **2. Helping local government and citizens know about opportunities for public participation in proceedings related to pipeline safety**

The Trust has established a webpage within its existing website (<http://pstrust.org/finding-info-and-getting-involved/participation-opportunities/>) where we are posting notifications of proposed rules by state and federal agencies, along with background material on each proceeding and information on how to participate. We have established an email alert list

of approximately 220 individuals and have been notifying members of that list of new opportunities when rules are proposed or workshops held, and any status changes (extensions, etc.) of previous notifications.

**3. Providing understandable explanations of the technical substance involved in proceedings through the help of hired technical experts**

We have entered into one consulting contract for technical assistance explaining aspects of the proposed natural gas rule relating to engineering critical assessments referred to in the integrity verification process. We are also nearly in contract with another consultant to provide assistance understanding what mitigation measures are available and effective for reducing and managing methane emissions from non-emergency blow downs in advance of repairs, maintenance or integrity testing. We are working in coordination with the Environmental Defense Fund on this issue to take advantage of their substantial previous work on methane emissions in the pipeline sector, and to leverage the amount of funding available for this effort. We are continuing to search for a third consultant we hope to hire to assist with understanding the cost benefit analysis process used by PHMSA in its rulemaking, using the Regulatory Impact Analysis for the natural gas rule as an example. Each of the reports provided by the consultants will be made available on our website for reference by other individuals looking to be better informed in the process of submitting their own comments.

**4. Cover the cost of travel for select citizens to travel to pertinent official workshops, meetings, etc. to participate and better understand the proceedings.**

We offered to make some of the funding available for this task available for individuals wanting to attend PHMSA's workshop on spill response planning on April 12, but the 2 week notice for that workshop was so short that no members of the public were able to adjust their schedules to attend. We expect that additional workshops, such as the upcoming ones on LNG and Public Awareness, the Technical Advisory Committee meetings and other proceedings yet this year will provide ample opportunity for members of the public hoping to attend and participate in such a proceeding.

**5. We continue to track and measure** the efforts under each element of the grant. Final numbers related to the program elements will be provided in our final report.

Please let me know if you have any questions or need any additional information for this report.

Thanks for your assistance.



Carl Weimer  
Executive Director  
Pipeline Safety Trust