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Technical Assistance Grant No. DTPH5615GPPT21

Final 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 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 was completed in the early summer of 2016. We printed 1000 hard copies of the Guide and also produced a PDF version for electronic distribution. The new Guide to Pipeline Safety Rulemaking was promoted on our website, our listservs, our Smartpig blog, and on our Facebook page. Hardcopies of the Guide were mailed to those requesting them, and the PDF version is easily available on our website (<http://pstrust.org/wp-content/uploads/2016/09/Rulemaking-Guide-Final-singles.pdf>) for free download. We also distributed hardcopies of the new Guide at our annual pipeline safety conference, as well as at the 2016 NAPSR annual meeting. To date 800 of the 1000 printed copied have been distributed.

We have included a copy of this new Guide with this final report.

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 our 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. We also post the most pertinent workshops and rulemakings on our two listservs that current go to 968 individuals, and on our Facebook page that has 1184 followers. The availability of these opportunities and the Guide to Pipeline Safety Rulemaking have been promoted to a wider audience through targeted paid Facebook advertising

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

We entered into three consulting contracts for technical assistance.

One contract was with Accufacts Inc. (\$10,000) for an explanation and analysis of “engineering critical assessments” as referred to in the integrity verification process of the proposed large natural gas rule. That report, entitled **A Review, Analysis and Comments on Engineering Critical Assessments as proposed in PHMSA’s Proposed Rule on Safety Of Gas Transmission and Gathering Pipelines**, can be found at: <http://pstrust.org/wp-content/uploads/2015/10/5-16-16-Signed-Final-Report-to-PST-on-ECA.pdf>

We also contracted with MJ Bradley and Associates (\$10,150.23) 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. This related to various repair requirements and criteria in the proposed PHMSA large natural gas rule. We worked 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 technical report. In the end we paid slightly less than half of the cost of this report from these TAG funds with EDF picking up the rest of the costs. That report, entitled **Pipeline Blowdown Emissions and Mitigation Options**, can be found at: <http://pstrust.org/wp-content/uploads/2015/10/PHMSA-Blowdown-Analysis-DRAFT-FINAL-30jun16.pdf>

Our third technical contract was with Wider Lens Research LLC (\$10,350) for a review of the Public Awareness requirements for pipeline companies, how those requirements came into being, and an analysis of the current API RP 1162, which is incorporated by reference into the PHMSA rules. This report was provided to the API RP 1162 Task Group, which includes PHMSA staff, as they prepared to work on amendments to the Recommended Practice. That report, entitled **Evidence-Based Risk Communication and Pipeline Public Awareness**, can be found at: <http://pstrust.org/wp-content/uploads/2013/03/PST-Risk-Communication-Report-Final-Version.pdf>

All of these technical assistance reports are available for free on our website, and the two related to the large PHMSA natural gas rule were entered into the dockets for that rule for all to review. We have included copies of all of these technical assistance reports as part of this final report.

4. Providing comments from a variety of sources, as available, including our own, to interested groups to help inform their own participation.

The grant agreement removed the section from our original proposal that dealt with us drafting our own comments and distributing them and the comments of others directly to interested parties. The reasoning for this removal was that regulations.gov already provides this service for each docketed rule. On our Public Participation webpage (<http://pstrust.org/finding-info-and-getting-involved/participation-opportunities/>) we did include a direct link to the docket for each PHMSA rule that was open for comments, so interested parties could find the comments from all parties. We also provided a link on that same page to our own comments and related testimony. We included these direct links to the dockets because during the course of this grant we heard from quite a few people who had never used the regulations.gov system and did not understand how to locate the correct dockets.

5. 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 help cover the travel costs for citizens to attend the following workshops and other official PHMSA meetings:

- **PHMSA Pipeline Safety Research and Development Forum**
- **PHMSA Public Workshop on Underground Natural Gas Storage Safety**
- **PHMSA 2016 Pipeline Public Awareness Workshop**
- **PHMSA Public Workshop on Liquefied Natural Gas (LNG) Regulations**
- PHMSA Public Workshop for Oil Spill Response Planning and Preparedness
- **Multiple meetings of the Gas and Liquids Technical Advisory Committees**
- **Voluntary Information-Sharing System Working Group**

Unfortunately, some of these workshops and meetings were finalized with only a couple of weeks of notice, which made it difficult for citizens to take off work and arrange for economical travel. When available we also made people aware of webcast options for these workshops. In the end we managed to get interested citizen to attend all of these events with the exception of the Oil Spill Response Planning and Preparedness workshop. The most interest was in the Public Awareness workshop where we provided travel assistance for seven members of the public to attend, and some of those members have continued to provide input to the API RP 1162 update effort.

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

Thanks for your ongoing assistance.



Carl Weimer
Executive Director
Pipeline Safety Trust