



The Vermont Department of Public Service

VFDA

Vermont Fuel Dealers Association



2016 Vermont Fuel Dealer Conference
Thursday, May 19 and Friday, May 20
Equinox Resort, 3567 Main Street, Manchester Vermont

Today's topics

- Vermont Dept. of Public Service
- Propane pipeline systems subject to 49CFR49 (What is a “jurisdictional” system) ?
- What to expect during an DPS inspection ?
- Collaboration (VFDA/DPS)
 - VFDA O&M template for compliance with DOT PHMSA code requirements.



The Vermont Department of Public Service
112 State St. Montpelier, VT 05620-2601

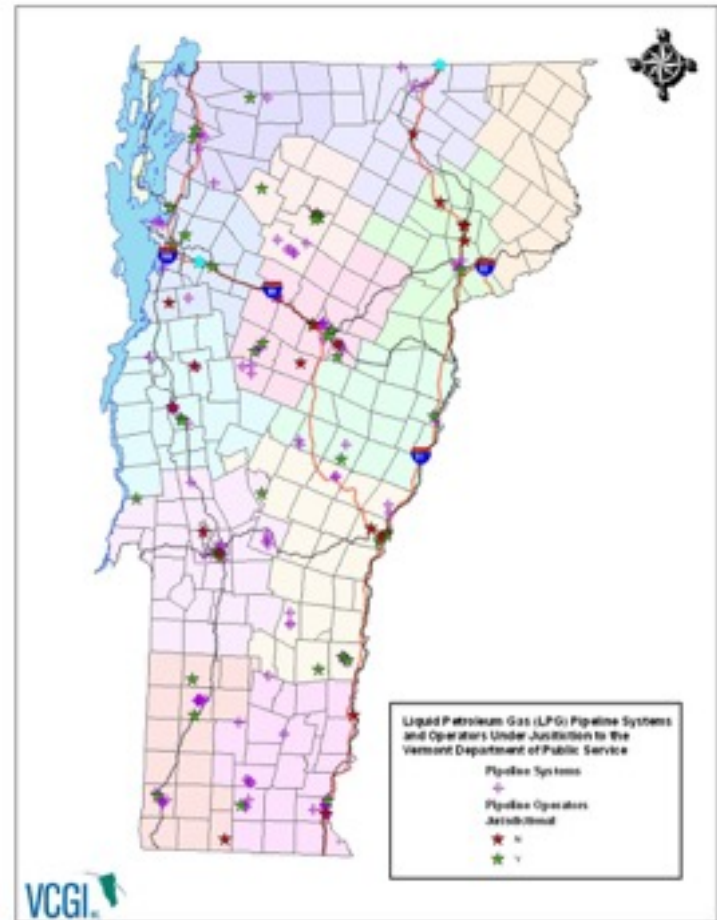
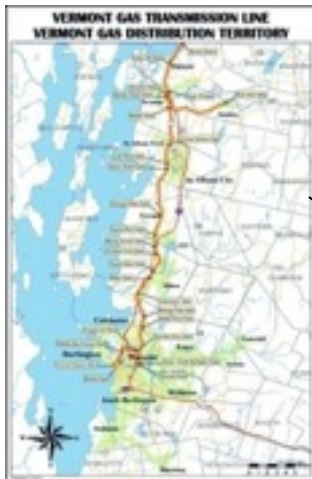
GC Morris
Gas Engineer
802-828-4073
gc.morris@vermont.gov

Michelle LaPerle
Administrative Services Coordinator II
802-828-3182
michelle.laperle@vermont.gov

Vermont Gas Pipeline Safety Program administration

- Fulfill the Department's responsibilities to maintain the Federal/State Partnership for pipeline safety and underground facility damage protection
- Enforce of state and federal gas safety laws, which apply to natural gas utilities, jurisdictional propane pipeline system operators and certain LNG/CNG facilities.
- Perform outreach activities to encourage safety code compliance and publicize best practices for underground utility protection and gas safety.
- Conduct investigations
 - Gas company operating plan assessments
 - Personnel qualification assessments
 - Operating performance assessments
 - Gas Leak Incidents
 - Gas industry facility proposal assessments
 - Inspections of existing gas pipeline facilities
 - Inspections of the construction of new gas facilities.

Gas Pipeline Facilities



What is a “jurisdictional” propane pipeline system ?

49 CFR PART 192—TRANSPORTATION OF NATURAL AND OTHER GAS BY PIPELINE: MINIMUM FEDERAL SAFETY STANDARDS

§ 192.1 What is the scope of this part?

- (a) This part prescribes minimum safety requirements for pipeline facilities and the transportation of gas, including pipeline facilities and the transportation of gas within the limits of the outer continental shelf as that term is defined in the Outer Continental Shelf Lands Act (43 U.S.C. 1331).
- (b) This part does not apply to—

What is a “jurisdictional” propane pipeline system ?

49CFR192.1

(b) This part does not apply to—

- (b)(5) Any pipeline system that transports only petroleum gas or petroleum gas/air mixtures to—
- (i) Fewer than 10 customers, if no portion of the system is located in a public place; or
 - (ii) A single customer, if the system is located entirely on the customer's premises (no matter if a portion of the system is located in a public place).

What is a “jurisdictional” propane pipeline system ?

Public Place

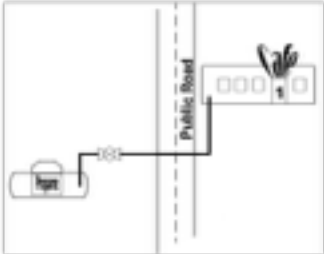
From OPS interpretation of 49CFR192.1:
“...means a place which is generally open to all persons in a community as opposed to being restricted to specific persons. We (OPS) consider churches, schools and commercial buildings as well as publicly owned right-of-way or property which is frequented by persons to be public places...”

NON JURISDICTIONAL SYSTEM



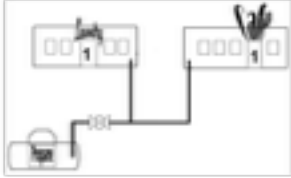
Single customer with system entirely on private property

JURISDICTIONAL SYSTEM



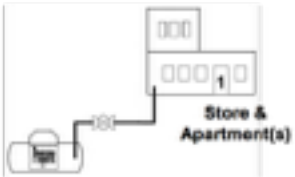
Portion of System in “public place” and System is not exclusively on customer premises.

JURISDICTIONAL SYSTEM



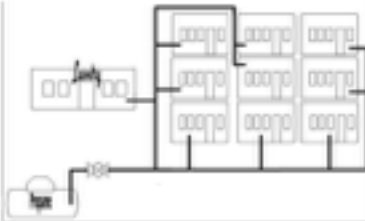
System serves more than one premise / public place customer.

JURISDICTIONAL SYSTEM



System serves a public place customer and one (or more) other premise. This other premise may be attached to the public place or it may be separate.

JURISDICTIONAL SYSTEM



System with 10 or more customers. (all premises may be private)
System may be one “account” or “business customer”, but is jurisdictional because 10 or more ultimate consumers are supplied.

Inspection Expectations

VT DPS program activities

Standard Comprehensive (includes Drug & Alcohol Avoidance)					Design, Testing, and Construction	On-Site Operator Training	Integrity Mgmt		Operator Qualification		Investigating Incidents or Accidents	Damage Prevention Activities	Compliance Follow-Up	
Transmission PH65A Form-01	Distribution PH65A Form-02	Pipeline Drug & Alcohol Questions Form-13	Public Awareness Prog. Effectiveness Inspection Form-21	SC Control Room Mgmt Question Set IA Equivalent	Start Report of Gas Pipeline & Compressor Status Consultation Form-05		Site MPP Field Verification Inspection Form-35	DIMP Inspection Form-22	DIMP Inspection for Master Meter and Local LPG Operators Form-23	Operator Qualification Inspection Form-14	Operator Qualification Field Inspection Protocol Form-15	PH65A Form 11		

Inspection Types for Propane system operators

Inspection Expectations

Closer look

VT DPS program activities

Design, Testing, and Construction	On-Site Operator Training	Incidents or Accidents	Prevention Activities	Compliance Follow-Up
Eval. Report of Gas Pipeline & Compressor Station Construction Form -05		PHMSA Form 11		

Inspection Types for Propane
system operators, only as necessary

Inspection Expectations

Closer look

	Distribution PHMSA Form -02	Pipeline Drug & Alcohol Questions Form -13	Public Awareness Prog. Effectiveness Inspection Form -21	GT Control Room Mgmt Question Set IA Equivalent
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Inspection Types for Propane operators do not include:
Drug & Alcohol Avoidance or Control Room Mgmt. reviews

Inspection Expectations

VT DPS program activities

Integrity Mgmt			Operator Qualification	
Gas IMP Field Verification Inspection Form -16	DIMP Inspection Form -22	DIMP Inspection for Master Meter and Small LPG Operators Form -23	Operator Qualification Inspection Form-14	Operator Qualification Field Inspection Protocol Form-15

Inspection Types

gas safety code compliance

- Collaboration: Vermont DPS Gas Pipeline Safety Program and the Vermont Fuel Dealers Association.
- Promote general gas safety in Vermont
 - clarifying the department's expectations to satisfy the code
 - making those expectations readily available
 - provide specific guidance to administer pipeline operations in a manner which can fulfill requirements included in typical inspections.

gas safety code compliance projects

- Steering Committee: Vermont DPS and select members of the VFDA, involved in operating propane pipeline systems
- Review existing VFDA Operations & Maintenance template
- Enhance O&M to comply with the Code of Federal Regulations (49CFR192 and others).
- Produce generic written procedures and documentation methods for pipeline safety activities to be “auditable” via the current federal inspection forms designed for that purpose.

<http://www.vermontfuel.com/training/jurisdictional.html>



Proudly Supporting Vermont's Home Energy Providers

Home Training Keys To Compliance Membership Contact

Propane Jurisdictional Systems

A Guide to Understanding Basic Fundamentals and Requirements

Created by Propane Education Research Council

Guidance to identify jurisdictional propane pipeline systems

Operation & Maintenance, Emergency & Damage Prevention Plan (PDF)

Operation & Maintenance, Emergency & Damage Prevention Plan (MS Word)

Operator Qualification template (MS Word)

Model LPG Public Awareness Plan for Jurisdictional Propane Facilities

GC Morris Presentation/VFDA 2012 Conference

End

Questions?