Washington City and County Pipeline Safety Consortium

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April 28, 2003

Dockets Facility
U.S. Department of Transportation
Research and Special Programs Administration
Room PL - 401
400 Seventh Street, Southwest
Washington, D.C. 20590

Subject: **Comments on Docket No. RSPA–00–7666; Notice 4, Pipeline Safety: Pipeline Integrity Management In High Consequence Areas (Gas Transmission Pipelines)**

The Washington Cities and Counties Pipeline Safety Consortium offers the following comments on the Research and Special Projects Administration ("RSPA") Notice of Proposed Rulemaking entitled, "Pipeline Safety: High Consequence Areas for Gas Transmission Pipelines." The Consortium is comprised of the following Washington state cities and counties directly affected by pipelines: Cities of Bellevue, Bellingham, Bothell, Kent, Redmond, Renton, SeaTac, Seattle, Tumwater and Woodinville, and the Counties of Clark and Thurston. These jurisdictions alone represent over 1.97 million people. The Consortium's charge is to provide information, assistance and advocacy to local government agencies and officials on matters relating to hazardous liquid and natural gas pipeline safety.

Interact with local jurisdictions in determining HCAs

The Consortium views interaction with local jurisdictions as a key element in effectively and efficiently locating and identifying HCAs. Local jurisdictions are the first responders and have a high potential for injury should a rupture occur. Citizens of local jurisdictions live, work and play above and around pipelines; a rupture would affect them first and to the largest degree.

Local jurisdictions also have the best knowledge of the land. While natural gas companies' information about the location of people is only as accurate as the latest data collection date, local jurisdictions control land use planning and permitting for future growth.

They are likely to have knowledge of future trends in growth. Finally, local jurisdictions are charged with protecting local interests including protecting economic benefits derived from the pipeline's location in the jurisdiction. Local jurisdictions will be responsive to assisting federal agencies and industry representatives in the correct identification of HCAs because the jurisdiction will be better protected in the event of a rupture.

High Consequence Areas for Gas Transmission Pipelines definition should permit two options.

The Consortium supports RSPA's work to define High Consequence Areas (HCAs) for natural gas pipelines based on empirical correlations between pipeline diameter and pressure in an attempt to reasonably capture potential impact zones of a gas transmission pipeline rupture. Realizing the differences in potential impact zones between large and small diameter gas transmission pipelines, the suggested two simple approaches presented by the gas industry at a March 28, 2003, public meeting of the Technical Pipeline Safety Standards Committee appear workable. The proposed approaches mainly differ in their data gathering effort for class 3 and 4 area classifications.

Pipeline operators with smaller diameter transmission tend to exhibit rupture failures that fall within the current area classification boundaries. We believe that using the existing class location information for such operations will result in an easy-to-implement rule because natural gas pipeline operators are already required to maintain data on the distribution of habitable buildings and certain defined areas near their pipelines. This approach allows smaller operators to elect to remain with class 3 and 4 area classification designations avoiding the additional onus of potential impact zone determination, collection, and monitoring that may prove burdensome for these smaller diameter systems with little resulting gain in effective safety.

Operators of large diameter transmission pipelines can impact areas well beyond the defined area classifications of 660 ft on either side of pipelines. For such systems, potential impact zone (PIZ) determinations are more appropriate. We support the use of the empirical C-FER model to identify such PIZ's. We must advise that the PIZ is not a siting tool, but a mechanism to screen pipelines for additional integrity management scrutiny.

The Consortium further supports RSPA's proposal to extend the definition of HCA beyond the existing class location areas to include facilities housing people who may not be able to evacuate an area quickly.

The HCA definition should include lower thresholds for outdoor or unsheltered areas where people congregate.

The HCA definition should include lower thresholds of use for outdoor and unsheltered areas. Currently this use threshold is "where 20 or more people congregate, less than 50 days in any 12 month period". This is similar language to that utilized in liquid pipeline rulemaking. We recommend that this important threshold be lowered to 10 or more people. Due to the much higher probability that a gas pipeline rupture will ignite compared to liquid pipelines, we believe a lower unsheltered threshold is appropriate and warranted. We feel that emphasis should be placed on these areas because unsheltered people using these areas do not have the protection of a building to shield them from the consequences of a rupture. Unsheltered people have less time to evacuate a danger area than those in buildings. We believe that by lowering this threshold you will be including only a smaller additional number of pipeline miles while substantially improving the true effectiveness of this rulemaking and the survivability of citizens.

OPS has specifically asked for comments on rural churches. We believe that if such facilities incorporate outside areas that fall under the definition of HCA then such rural churches should be captured in the definition.

The HCA definition should include important infrastructure

One area neglected by the HCA definition is our important infrastructure. Places such as electric transmission corridors and substations, drinking water and sewer facilities, communication lines, transportation infrastructure such as major roadways, bridges and tunnels, airports, railway lines and terminals, and ferry and other boat docks are vulnerable to damage from the initial impact of a pipeline rupture and from any flying debris that would be generated. In addition to the potential injury or loss of life at the site, a pipeline rupture near one of these facilities could knock out vital utilities and could detrimentally affect a wide range of people. As several local pipeline failures have demonstrated, a rupture impact zone can be quite large and affect nearby critical infrastructure.

The HCA definition should include environmentally sensitive areas.

In its NOPR, the RSPA stated that environmentally sensitive areas were not included in the definition of high consequence areas because the impact from a gas pipeline rupture would be highly localized. This argument is blind to the vast tracts of land existing outside the typical 60 foot pipeline right of way but within the very real impact zone of 660-1000 feet. Conceivably, there are some environmentally sensitive areas, particularly those critical to endangered species, that deserve consideration.

The Consortium thanks you for this opportunity to comment.

Sincerely,

/s/ Katherine M. Hansen

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