SGA member companies had the opportunity to meet via conference call with PHMSA’s Alan Mayberry, Field Operations Deputy, and John Hess, Director, Emergency Support and Security to discuss the recently issued Advisory Bulletin ADB-10-08.

The ADB advised operators of gas and hazardous liquid pipeline facilities to make their pipeline emergency response plans available to the local emergency response officials. Operator’s voiced concern that this would effectively change the current regulations.

Under Part 192, paragraphs 192.615 (a) (2), Operators are responsible for “Establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials.” Further in paragraph 192.615 (b) (3) (c) (1-4) each Operator shall establish and maintain liaison with appropriate fire, police, and other public officials to: (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency; (2) Acquaint the officials with the operator’s ability in responding to a gas pipeline emergency; (3) Identify the types of gas pipeline emergencies of which the Operator notifies the officials; and (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.”

John Hess stated that the DOT and PHMSA do not change regulations through advisory bulletins. John indicated that the Advisory Bulletin is intended to act as a reminder and to add emphasis to the requirement to communicate with emergency responders. He advised that Operators are not required to share or provide emergency responders and public officials with their written emergency plans: however, they are expected to adequately inform those parties regarding the location of the pipeline, type of product, types of emergencies that might be encountered, expectations during an emergency, conditions monitored, hazards, what to do, what not to do and what the Operator will be doing. This was not an exhaustive list but the point was clear that the standards for Operators have not changed as a result of the Advisory Bulletin 10-08.

Alan Mayberry and John Hess also clarified that in the reference to joint emergency drills in the ADB should not be interpreted to mean that emergency drills are not required for Operators subject to Part 192. The Advisory Bulletin states: “PHMSA recommends that operators provide such information (emergency plans) to responders
through the operator’s liaison and public awareness activities, including during joint emergency response drills.”

Alan and John both advised that the Bulletin was not creating a requirement to conduct emergency response drills. However, emergency response drills are an effective tool in training and advising local responders of emergency plans and procedures.

In summary, ADB 10-08, was intended to heighten the operator’s awareness on the need to communicate and coordinate with local emergency responders and public officials. Keeping the public, public officials and emergency responders informed is a critical component in providing natural gas to customers in a safe, reliable and responsible manner.

Thanks to all who participated in the call and special thanks to John Hess and Alan Mayberry for their time and direct responses to our questions.

SGA Contact: Randy Randolph (rrandolph@southerngas.org)