Subcommittee on Energy
Hearing on
"The State of Pipeline Safety and Security in America"
May 1, 2019

Mr. Andrew J. Black, President and CEO
Association of Oil Pipe Lines

The Honorable Cathy McMorris Rodgers (R-WA)

1. I know your pipeline companies are serious about improving their safety records and incorporating lessons learned from prior accidents.

    a. Can you provide some recent examples of lessons learned, or recommendations made by PHMSA or NTSB that have been implemented?

Answer:

Pipeline company safety records are improving. Over the last 5 years, pipeline operators have reduced the number of liquids pipeline incidents impacting people or the environment by 20%. This is government data publicly available from the U.S. Pipeline and Hazardous Materials Safety Administration (PHMSA). PHMSA data also shows pipeline incidents impacting people or the environment caused by incorrect operation are down 38% over the last 5 years, and pipeline incidents impacting people or the environment caused by corrosion, cracking or weld failures are down 35% over the last 5 years.

The improved pipeline safety record is due in large part to industry and AOPL member companies work hard to improve pipeline safety. We are transparent about where we are doing well and where we can do better. The statistics above come from the performance report we develop jointly each year with the American Petroleum Institute (API) analyzing pipeline safety data. We use this analysis to guide our industry-wide safety programs focusing on key pipeline safety issues.

Through this strategic effort the pipeline industry has addressed key safety recommendations from Congress, the U.S. National Transportation Safety Board (NTSB), PHMSA. NTSB recommendations after a major pipeline incident in Marshall, MI in 2010 led to pipeline operators working together through AOPL and API to develop new

industry-wide recommended practices (RP) to help operators find and fix cracking in pipelines (API RP 1176), manage leak detection programs (API RP 1175), respond to pipeline emergencies (API 1174) and apply safety management systems to pipelines (API 1173). Industry's work to apply holistic safety management programs found successful in the aviation, nuclear and chemical industry to the pipelines industry earned the pipeline industry a rare commendation from NTSB that our response to their recommendation "exceeded their expectations."

The pipeline industry is also diligent in taking PHMSA advisory bulletins to heart. A lesson learned from the Marshall, MI incident was the need to integrate inspection results and safety factors from multiple sources to determine if their additive factor separately was insufficient to indicate a serious safety threat, but when combined pointed to a potential issue requiring attention. PHMSA issued an advisory bulletin on this issue and industry responded by developing a technical report on pipeline integrity data management and integration. Industry has also incorporated lessons learned from PHMSA bulletins on extreme weather by expanding its recommended practice for assessing river crossings to guard against river scouring or bank washouts.

That said, the pipeline industry is not waiting to respond to recommendations from other safety stakeholders. This spring, the pipeline industry issued an updated recommended practice for its core integrity management inspection and maintenance program and is driving to complete a new recommended practice for assessing dents in pipelines accompanied by cracking or corrosion. Both industry documents contain recommended best practices that go beyond PHMSA's regulations in areas where PHMSA requirements are out of date or contain gaps. For these reasons, industry continues to support tools to help modernize PHMSA's requirements, such as the proposed technology demonstration pilot program, the Voluntary Information Sharing program, and incorporating the latest safety recommendations by reference into PHMSA regulations.