

Section A – General
2020, 2021, 2022 PHMSA Enforcement Cases

192.631(a)(1)

This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section, except that for each control room where an operator's activities are limited to either or both of:

(i) Distribution with less than 250,000 services, or

(ii) Transmission without a compressor station,

the operator must have and follow written procedures that implement only paragraphs (d) (regarding fatigue), (i) (regarding compliance validation), and (j) (regarding compliance and deviations) of this section.

Texas Gas Transmission, LLC CPF 3-2021-018-NOA Item #1

Texas Gas's Control Room Management (CRM) procedure is inadequate because it does not state the criteria or process for how Texas Gas determines which facilities are control rooms, and which of those facilities in turn are required to follow written control room management procedures that implement the requirements of this section. In its CRM procedure, Texas Gas only provided a simple statement of which locations are control rooms, but no criteria by which the control rooms are identified. There are many facilities that may have the equipment and personnel that may have the ability to control the pipeline. For example, storage field or compressor station SCADA operator desks and Human Machine Interface (HMI's). These facilities need to be assessed using some established criteria and determined whether or not they are control rooms. The process should provide a consistent method to evaluate all facilities as well as clearly communicate which are control rooms and need to follow written control room management procedures that implement the requirements of this section.

The CRM procedure must be amended to provide a process to evaluate facilities and determine which facilities are control rooms subject to the requirements of this section.

Operator Response:

Texas Gas has revised its Control Room Management Procedures - Task List 6603: Control Room Jurisdiction Evaluation and CRM Plan Section 1.2: Control Room Overview [§192.631(a)(2)] to read as follows:

Task List 6603: Control Room Jurisdiction Evaluation

Task List 6603: *Control Room Jurisdiction Evaluation* will be reviewed when new facilities that have the potential to be considered a control room are constructed or acquired by Boardwalk. Once the determination has been made on the jurisdictional status of the new facility a memorandum of the findings will be sent to Control Room Management.

- Do the employees of the facility use a SCADA system to monitor and control pipeline facilities?
 - o Reference: FAQ A.05 and FAQ A.06

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- Do the employees of the facility operate station equipment outside of the defined station boundaries (fence lines or property/map boundaries)?
 - o Federal Register/Vol. 74, No.231/Thursday December 3, 2009 / Rules and Regulations 63317, FAQ A.20
- Are the employees of a facility responsible for monitoring a SCADA system and contacting others to initiate corrective actions?
 - o FAQ A.07 and 192.3
- Are the employees of a facility responsible for connected pipelines beyond the boundaries?
 - o FAQ A.20
- Distribution with less than 250,000 services (Natural Gas Only)?
 - o Federal Register/Vol. 74, No.231/Thursday December 3, 2009 / Rules and Regulations 63317, FAQ A.20
- Transmission with compression (Natural Gas Only)?
 - o Federal Register/Vol. 74, No.231/Thursday December 3, 2009 / Rules and Regulations 63317, FAQ A.20
- Gas Transmission or Hazardous Liquid?
- Is the facility a Control Room?

Documentation: Memorandum of findings

1.2 Control Room Overview [§192.631(a)(2)]

The Control Room is located at the Boardwalk Office in Owensboro, Kentucky. The Backup Control Room is located at Wing Avenue Training Center in Owensboro, Kentucky.

Mainline and Storage Compressor Stations have what is often referred to as a “station control room” where Station Operators monitor facilities inside the fenced station and are not responsible for connected pipelines beyond the station boundary. These remote station control rooms are not authorized to make changes without confirmation from Gas Control. Station control rooms are not subject to PHMSA CRM regulations and the station operators are not

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considered to be “Controllers.” Even though Mainline and Storage Compressor Stations have an HMI system for OPP and to protect the health of the units, the station operators may monitor their units, but they do not control pipeline facilities.

As new facilities are constructed with station control rooms, **Manager, of Compliance Services (or designee) and Director of Gas Control (or designee)** will evaluate the facilities, monitoring, and remote control capabilities, to determine if the control room is a “station control room” or a control room subject to PHMSA CRM regulations. If determined that the control room is subject to PHMSA CRM regulations, then a CRM Plan will be implemented, or the control room will be incorporated into Boardwalk’s existing CRM Plan and will adhere to all established procedures. Refer to Task List 6603 Control Room Jurisdiction Evaluation.

The SCADA system is supported by an UPS backup power supply. In the event of an extended purchase power outage, an Emergency Generator is utilized until purchase power is restored. Access to the Control Room is by keycard only.

The Control Room is a separate room within the Gas Control work area. The access to the Boardwalk Control Room is through keycard only. There are three (3) consoles with five (5) monitors per Controller. The SCADA system includes screen displays for all PHMSA regulated natural gas pipelines, compressor stations, and meter stations owned or operated by Boardwalk.

The Control Room operations are manned 24 hours/day, 365 days per year, on a 12- hour shift rotation.

If there is an emergency which requires evacuation, the Controller will evacuate the location, drive to a safe location and follow the Boardwalk Event Response Plan (ERP).

Closure Letter

From June 15 through June 19, 2020, a representative from the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to chapter 601 of 49 United States Code, conducted an on-site pipeline safety inspection of Texas Gas Transmission, LLC’s (Texas Gas), Control Room Management procedures in Owensboro, Kentucky. As a result of the inspection, Texas Gas was issued a Notice of Amendment on April 9, 2021, which proposed amendment of your procedures.

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Texas Gas submitted its amended procedures on August 23, 2021. My staff reviewed the amended procedures, and it appears that the inadequacies outlined in this Notice of Amendment have been corrected.

This letter is to inform you no further action is necessary and this case is now closed. Thank you for your cooperation.