Date: January 24, 1997

SUBJECT: PIPELINE STATUS TERMINOLOGY (Active/Out-of-Service/Abandoned)

Over the past few years, the issue of terminology for the various levels of pipeline status has become increasingly frustrating for operator staff. Confusion has arisen because pipeline operators and the California State Fire Marshal (CSFM) may use different terms to define the active or inactive status of a pipeline. This status determination affects the level of compliance with State and federal standards required of the pipeline operator. It also establishes the applicability of annual State fees. This letter is an attempt to clarify both terminology and definitions used by CSFM Pipeline Safety staff when referring to the operational status of a pipeline. This document also outlines procedures the operator must follow when requesting a change in a pipeline’s operational status.

ACTIVE PIPELINE means a pipeline or pipeline segment which is in service whether or not the pipeline is fully operational. This includes pipelines which may have been utilized to transport hazardous liquids but are currently static or unused. This pipeline category includes any pipeline or pipeline segment which has NOT been formally approved in writing as OUT-OF-SERVICE or ABANDONED by CSFM. These pipelines must comply with all provisions of State and federal standards (e.g., Part 195, etc.) and annual CSFM fees are applicable. Each ACTIVE pipeline segment (whether in use or not) must be reported to CSFM as ACTIVE on the annual Operator Questionnaire.

OUT-OF-SERVICE PIPELINE means a pipeline or pipeline segment which has been effectively cleaned of all hazardous liquids, filled with water or inert gas and blinded or otherwise isolated from an active pipeline system. After the process has been verified and accepted in writing by CSFM, each of these pipelines must comply with minimum federal maintenance and inspection requirements (e.g., cathodic protection, right-of-way patrols, USA notification, etc.) Approval of this reclassification plan by CSFM does not affect or negate any permit or approval requirement this classification of pipeline. However, CSFM is required to maintain basic data on out-of-service pipelines. Therefore, these pipelines must be reported on the annual Operator Questionnaire. Before a pipeline can be reclassified from ACTIVE to OUT-OF-SERVICE, the operator must submit to the State Fire Marshal and the State Fire Marshal must approve a written plan describing the process to be used and the future maintenance and inspections to be performed.

ABANDONED PIPELINE means a pipeline or pipeline segment which has met the criteria of an OUT-OF-SERVICE pipeline (purged, sealed and disconnected from an operating system) but will NOT be maintained to minimum USDOT inspection and maintenance standards. An abandoned pipeline cannot be returned to hazardous liquid service. Before a pipeline can be reclassified from ACTIVE or OUT-OF-SERVICE to ABANDONED, the operator must submit to the State Fire Marshal and the State Fire Marshal must approve a written plan describing the process to be used. After approval from CSFM is granted in writing, this category of pipeline becomes non-jurisdictional to the State Fire Marshal and USDOT and State pipeline safety requirements (e.g., Part 195, etc.) no longer apply. Approval of the reclassification plan by CSFM does not affect or negate any permit or approval requirement of any other agency. CSFM fees are NOT applicable for ABANDONED pipelines. In addition, ABANDONED pipelines do not have to be reported to CSFM on the annual Operator Questionnaire. However, CSFM will maintain the data on these pipelines collected during the time the pipelines were CLASSIFIED as active or OUT-OF-SERVICE.

RETURN TO SERVICE Before a pipeline can reclassified from OUT-OF-SERVICE to ACTIVE, the operator must submit to the State Fire Marshal and the State Fire Marshal must approve a written plan describing the process to be used. An inspection of the pipeline and pipeline records will be conducted by CSFM to determine compliance with State and
Federal requirements. NO PIPELINE MAY BE OPERATED AS AN ACTIVE PIPELINE UNLESS IT HAS BEEN APPROVED BY CSFM. Pipelines that have been returned to ACTIVE status must be reported as ACTIVE on the annual Operator Questionnaire and annual fees are applicable.

Because of the significant confusion this issue has caused, we request that these definitions and requirements be incorporated into all Operations and Maintenance (O&M) manuals during the next revision cycle or before January 1, 1998, whichever is sooner. This will afford all operator staff with the opportunity to understand the process required by CSFM.

All questions regarding the issue of pipeline status may be directed to CSFM engineering staff by telephoning (562) 497-9100. Comments may also be directed to:

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