



**California State Fire Marshal
Pipeline Safety Division
Information Bulletin**

Updated: August 1, 2009

Supersedes: Information bulletin # 97-0001

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

Update to January 1997 information bulletin to reflect changing practices and federal rulemaking regarding Integrity Management Program requirements.

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.

An “**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 California Government Code Chapter 5.5 and US DOT- Title 49 CFR Part 195 regulations. Each ACTIVE pipeline segment (whether in use or not) is to be reported to CSFM as ACTIVE on the annual Operator Questionnaire and will be subject to annual pipeline user fees.

An “**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. Once the process has been verified

and accepted in writing by CSFM, this category of pipeline becomes non-jurisdictional. CSFM will no longer enforce 49 CFR Part 195 regulations. CSFM will still maintain basic data on out-of-service pipelines and request that the pipelines be reported on the annual Operator Questionnaire. They will not be assessed user fees. Should an operator wish to return this pipeline to service, they must show that basic federal maintenance and inspection activities were performed. (e.g., IMP, cathodic protection, right-of-way patrols, USA notification, etc.) or otherwise prove the integrity of the pipeline.

An “**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 have basic federal maintenance and inspection activities performed. An abandoned pipeline normally 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 US DOT. 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 be 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 to demonstrate the integrity of the pipeline. An inspection of the pipeline and pipeline records will be conducted by CSFM to determine compliance with state and federal pipeline regulations. Pipelines that have been returned to ACTIVE status are to be reported as ACTIVE on the annual Operator Questionnaire and pipeline mileage fees will be assessed.

PHMSA information:

Additionally, PHMSA has issued the following information regarding “idle” pipelines and Integrity management plan requirements in their Frequently asked Questions:

2.3 Do the requirements of the rule apply to “idle” pipe?

The regulations do not define “idle” pipe. Pipe is considered either active or abandoned. PHMSA Pipeline Safety understands “idle” pipe, as used in the context of this question, as pipe not currently being used to move hazardous liquid but that could be put back in service at a future date. This may include in-service pipe (i.e., contains hazardous liquids but is currently static or unused) or out-of-service pipe (i.e., effectively isolated from active pipe and containing water or inert gas). All idle pipe is subject to the requirements of the integrity management rule. However, idle pipe presents different risks and different treatment is appropriate.

In-service idle pipe (i.e., that contains hazardous liquid) represents a potential hazard to public health and the environment, even though idle. If such pipe leaks, adverse impacts can occur. Leaks may go undetected for some time, since idle pipe may not be covered by operator’s SCADA systems. For these reasons, operators must meet all requirements

and deadlines for pipe that is idled and contains hazardous liquids.

Out-of-service idle pipe represents a negligible hazard and PHMSA Pipeline Safety will accept deferral of certain activities required by the rule for out-of-service idle pipe. Operators must identify whether their out-of-service idle lines can impact HCAs. This will require, at a minimum, determining whether any portions of the lines lie within (i.e., intersect) HCAs. Operators can defer more detailed evaluation of whether non-intersecting segments of an out-of-service idle line can affect HCAs until they return the line to service.

Out-of-service idle line segments that can affect HCAs must also be identified in the Baseline Assessment Plan. Operators may defer conducting baseline assessments or re-assessments if the idle line remains out-of-service. It should be noted that out-of-service idled mileage need not be included in the 50% baseline assessment completion deadline requirements, but should be evaluated against those requirements if returned to service.

All deferred assessments and any known required repairs for which repair deadlines have passed must be completed as part of any later return of that line to service. A baseline assessment need not be run immediately if the deadline for completing baseline assessments for pipe of the same category (e.g., March 2008 for category 1 pipe) has not yet expired and a delay is consistent with 195.452(e)(1) BAP scheduling requirements. For example, to assure that the line returning to service is properly reflected in the BAP, required risk factors used to establish the BAP schedule should be reviewed and updated as necessary to reflect return to service operating conditions.

Similarly, a re-assessment need not be performed immediately if the baseline or most recent re-assessment was conducted within the interval indicated by the 195.452(j)(3) reassessment interval determination process (including updated risk factors). The baseline assessment plan or re-assessment schedule, as appropriate, should be modified to assure that an assessment is completed by the appropriate deadline. If the deadline has expired, then the assessment must be completed as part of returning the line to service.”

Also available at PHMSA website: <http://primis.phmsa.dot.gov/iim/faqs.htm>

Questions regarding the issue of pipeline status may be directed to CSFM engineering staff by telephoning (562) 497-9100. All written requests to change the status of a pipeline must be addressed to:

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Pipeline Safety Division
3950 Paramount Blvd., Suite 210
Lakewood, CA 90712