From April Heinze at NENA October 2022

A recent change made at the federal level will begin to impact your Emergency Communications Center (ECC) very soon. In April 2022, the Pipeline and Hazardous Materials Safety Administration (PHMSA), a subset of the National Highway Traffic Safety Administration (NHTSA), updated a rule for Pipeline Operators. The rule went into effect on October 5, 2022. The PHMSA rule is 49 CFR § 192.615(a)(8) and § 195.402(e)(7). It requires pipeline operators to contact the appropriate PSAP immediately upon notification of a *potential* rupture. The rule specifies the following:

A ***Notification of Potential Rupture*** is an observation of any unanticipated or unexplained:

- Pressure loss outside of the pipeline's normal operating pressure
- Rapid release of a large volume of a commodity (e.g., natural gas or hazardous liquid)
- Fire or explosion in the immediate vicinity

ECCs will begin to receive calls from pipeline operators for situations that may not be dispatchable. Of the three potential rupture notifications, the "pressure loss outside of the pipeline's normal operating pressure" will be the most difficult for responders to locate and mitigate. The operators will contact the ECC at the same time they are sending a technician to check the potential problem and determine the actual location. Many pipeline segments span an extensive area that could cross multiple ECC and Fire Department boundaries. Based on recent discussions with pipeline operators, they will call ECCs to fulfill the rule requirements to place the ECC on standby for a potential problem. They also want the ECC to contact them if the ECC receives any calls that may confirm there is a problem.

PHMSA and pipeline operators lack an understanding of local ECC and first responder policies and procedures. Some pipeline operators have already sent letters to ECCs that serve the areas their pipeline infrastructure is located. It does not appear that PHMSA engaged the ECC community before adopting the rule, nor have they communicated this information to the responder community.

So, what does this mean for your ECC? ECCs are responsible for intaking information and dispatching appropriate resources. They are not in the habit of intaking details of a potential emergency and doing nothing with it. To do nothing creates liability issues for your ECC. ECC Managers should work with local Fire Departments to develop local policy regarding handling these calls. The policy will need to address whether to hold the information until further information is provided from the pipeline operator or, if a dispatch is to be made, what resources need to be sent. The policy should also address how to properly notify the pipeline operator if the ECC or responders discover that a potential rupture is, in fact, an actual rupture. ECC management should incorporate pipeline maps into their local GIS systems or maintain a map easily accessible to call-takers of the pipeline infrastructure within their jurisdiction. PHMSA has a pipeline mapping system that ECCs can use, https://www.npms.phmsa.dot.gov/. In addition, the ECC should consider specific questions within their call intake guides.

Specific Questions that ECCs may want to incorporate for potential rupture situations include:

1. What commodity might be leaking, and how severe does the potential leak appear?
2. What is the point-to-point location span of the potential rupture?
3. Is any special equipment needed for responders to mitigate the potential problem?

To comply with the new PHMSA rule, pipeline operators must contact ECCs reliably. Some pipeline operators are local or regional companies with existing relationships with the ECCs in their area. However, many pipeline operators serve a large geographic area and may not have established relationships with every ECC within their service area. Those pipeline operators may utilize the NENA Enhanced PSAP Registry and Census (EPRC) to obtain PSAP contact information. NENA strongly encourages you to verify the accuracy of your PSAP's contact information in the EPRC database. ECC 24/7/365 emergency contact number(s) should be 10-digit lines answered as quickly as possible. Callers should not be required to interact with a phone tree or wait on hold if possible. Access to the EPRC is free for ECCs. To learn more and to request user accounts if you do not already use the EPRC, visit nena.org/eprc.