

**BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.**

Pipeline Safety: Eliminating Burdensome and
Duplicative Deadlines for Gas Pipeline Coating
Damage Assessments and Remedial Actions

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Docket No. PHMSA-2025-0114
RIN: 2137-AF84

**COMMENTS ON PIPELINE SAFETY:
ELIMINATING BURDENSOME AND DUPLICATIVE DEADLINES FOR
GAS PIPELINE COATING DAMAGE ASSESSMENTS AND REMEDIAL ACTIONS**

**FILED BY
AMERICAN GAS ASSOCIATION
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September 2, 2025

Table of Contents

I. Introduction	3
II. Support for the Rulemaking	3
III. Support for Linking Timelines to the In-Service Date	4
IV. Request to Restore “Onshore Steel Transmission Line” Qualifiers	4
V. Proposed Markup of NPRM Regulatory Text:	5
VI. Conclusion	5

**Pipeline Safety: Eliminating Burdensome and Duplicative Deadlines for Gas Pipeline
Coating Damage Assessments and Remedial Actions
Docket No. PHMSA-2025-0114**

I. Introduction

The American Gas Association (AGA)¹ and the Northeast Gas Association (NGA)² (jointly “the Associations”) appreciate the opportunity to comment on the Pipeline and Hazardous Materials Safety Administration’s (PHMSA) Notice of Proposed Rulemaking (“proposed rule” or “NPRM”) published on July 1, 2025, titled “Pipeline Safety: Eliminating Burdensome and Duplicative Deadlines for Gas Pipeline Coating Damage Assessments and Remedial Actions” (Docket No. PHMSA-2025-0114).³

II. Support for PHMSA’s Regulatory Action

The Associations commend PHMSA for its thoughtful and pragmatic approach to revising §§ 192.319 and 192.461, and offer the following comments supporting PHMSA’s proposed rulemaking. Additionally, the Associations recommend a critical clarification for PHMSA’s consideration regarding “Onshore Steel Transmission Line” qualifiers.

The Associations strongly support PHMSA’s proposed amendments to streamline and clarify the coating damage assessment and remedial action timelines for gas transmission pipelines. The current regulatory framework, which ties assessment deadlines to the completion of backfill and permit application dates, has proven to be impractical and unnecessarily burdensome. As PHMSA rightly notes, the ambiguity surrounding backfill dates and the administrative complexity of tracking multiple permit applications has led operators to adopt overly conservative and costly compliance strategies.

By eliminating vague language such as “promptly” and removing references to backfill and permit application dates, PHMSA has proposed to take meaningful steps toward reducing regulatory uncertainty and aligning compliance obligations with operational realities. For the reasons detailed below, the Associations anticipate that these changes would yield significant cost savings for

¹ Founded in 1918, AGA represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 180 million Americans. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one third of the United States’ energy needs.

² NGA is a regional trade association that focuses on education and training, technology research and development, operations, planning, and increasing public awareness of natural gas in the Northeast U.S. It represents natural gas distribution companies, transmission companies, liquefied natural gas importers, and associate member companies that provide natural gas to over 13 million customers in nine states.

³ Pipeline Safety: Eliminating Burdensome and Duplicative Deadlines for Gas Pipeline Coating Damage Assessments and Remedial Actions, Federal Register Vol. 90, No. 124 (July 1, 2025).

operators and improve the efficiency of coating assessments and remedial actions without compromising safety.

III. Support for Linking Timelines to the In-Service Date

The Associations commend PHMSA's proposal to link coating assessment timelines to the pipeline segment's in-service date, a milestone that is discrete, well-documented, and universally understood across the industry. This change will enhance regulatory clarity and facilitate more consistent implementation of coating integrity assessments. The in-service date is already referenced throughout the pipeline safety regulations and is memorialized in operator work management systems, making it a far more identifiable and reliable benchmark than backfill completion.

Similarly, PHMSA's proposal to anchor remedial action timelines to the date of the failed coating assessment, rather than the date of permit application, is a welcome improvement. This revision eliminates the need for parallel permit tracking systems and reduces administrative overhead, while maintaining a clear and safety-focused timeline for remediation.

IV. Request to Restore "Onshore Steel Transmission Line" Qualifiers

While the Associations support the proposed revisions to §§ 192.319(d), 192.319(f), 192.461(f), and 192.461(h), we respectfully request that PHMSA restore the "onshore steel transmission line" qualifiers to §§ 192.319(d) and 192.461(f). These qualifiers are essential to maintaining the scope and applicability of the coating assessment requirements as originally intended.

The NPRM's "Summary" and "General Discussion" sections do not indicate any intent by PHMSA to expand the applicability of these provisions beyond onshore steel transmission lines. However, in PHMSA's proposed regulatory text amendments (i.e., "PHMSA proposes to revise 49 CFR part 192 as follows...") the "onshore steel transmission line" language appears to have been inadvertently struck from § 192.319(d) and § 192.461(f). This omission would substantively expand the rule's applicability, which the Associations believe was not intended and would be inconsistent with the rationale and scope described elsewhere in the NPRM.

Accordingly, the Associations urge PHMSA to reinstate the "onshore steel transmission line" qualifiers in the final rule text. Doing so will preserve the clarity and intent of the regulation and prevent unintended compliance burdens on pipeline segments not originally subject to these requirements.

V. Proposed Markup of NPRM Regulatory Text:

The Associations suggest the following edits to the proposed regulatory language contained in the NPRM:

§ 192.319 Installation of pipe in a ditch.

* * * * *

- d) If the onshore steel transmission line construction project involves 1,000 feet or more of continuous backfill length along the pipeline, then no later than 6 months after placing the pipeline in service, an operator must perform an assessment to assess any coating damage and ensure the integrity of the coating using direct current voltage gradient (DCVG) surveys, alternating ~~alternative~~ current voltage gradient (ACVG) surveys, or other technology that provides comparable information about the integrity of the coating. Such coating surveys must be conducted except in locations where effective coating surveys are precluded by geographical, technical, or safety reasons.

§ 192.461 External corrosion control: Protective coating.

* * * * *

- f) No later than 6 months after placing an onshore steel transmission pipeline back into service following a repair or replacement that results in 1,000 feet or more of continuous backfill length along the pipeline, an operator must perform an assessment to assess any coating damage and ensure the integrity of the coating using direct current voltage gradient (DCVG) surveys, alternating current voltage gradient (ACVG) surveys, or other technology that provides comparable information about the integrity of the coating. Such coating surveys must be conducted except in locations where effective coating surveys are precluded by geographical, technical, or safety reasons.

VI. Conclusion

In summary, the Associations support PHMSA's proposed rulemaking to eliminate burdensome and duplicative deadlines for coating damage assessments and remedial actions. PHMSA's efforts to improve regulatory clarity and reduce unnecessary costs while maintaining a strong commitment to pipeline safety are commendable. The Associations respectfully request that PHMSA restore the "onshore steel transmission line" qualifiers to §§ 192.319(d) and 192.461(f) to ensure the final rule accurately reflects the agency's intent and preserves the scope of the original requirements.

The Associations appreciate PHMSA's consideration of these comments and look forward to continued collaboration to enhance the safety and reliability of the nation's pipeline infrastructure.

Respectfully submitted
Date: September 2, 2025



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