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PHMSA Proposes to Amend Pipeline Anomaly Response Criteria for Gas Transmission Pipelines and Hazardous Liquid and Carbon Dioxide Pipelines

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By Joseph Hainline and Susan Olenchuk

On July 8, 2026, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Proposed Rulemaking (NPRM) that would amend how operators of gas transmission and hazardous liquid pipelines (including carbon dioxide pipelines) evaluate, respond to, and remediate anomalies discovered on their pipelines.

The NPRM states that the proposed amendments are intended to enable operators to deploy technology and engineering advancements that facilitate the identification, evaluation, scheduling and remediation of pipeline anomalies more effectively and economically while protecting the public, property and the environment. The NPRM also would simplify timelines and harmonize requirements for gas and hazardous liquid pipelines.

In addition, the NPRM proposes changes to the annual report forms and instructions for gas transmission pipelines (Form PHMSA F 7100.2-1) and hazardous liquid pipelines (Form PHMSA F 7000.1-1). Copies of proposed changes to the forms and their instructions are here.

The NPRM is significant because it would modernize and clarify an operator's response options to pipeline anomalies. Technological and engineering advancements have significantly improved the ability of pipeline operators to detect, evaluate and characterize pipeline anomalies. The changes proposed in the NPRM would modify regulations, some of which were adopted decades ago, to enable operators to effectively deploy proven risk-based approaches to prioritizing anomaly responses.

The deadline for submitting comments on the NPRM and the proposed changes to the Annual Report forms is September 8, 2026. PHMSA also seeks comments on the Preliminary Regulatory Impact Analysis and Draft Environmental Assessment. Both can be found here.

The Notice of Proposed Rulemaking

Clarified Nomenclature. The NPRM clarifies response criteria nomenclature. Noting that existing regulations use the terms "anomaly" and "defect" interchangeably, the NPRM clarifies that "anomalies" are "unexamined deviations from the norm in pipeline material, coatings, or welds." After examination, an anomaly may be determined to be a defect or an imperfection. The NPRM also uses the term "response criteria" instead of "repair criteria," explaining that response criteria are actions, such as a repair or temporary pressure reduction, taken by an operator to ensure safety. A response is completed by a permanent repair or taking some other permanent action to restore pipeline serviceability.

Reorganized Anomaly Response Schedules. The NPRM proposes significant organizational changes and substantive revisions to existing anomaly response schedules and criteria for both gas transmission pipelines and hazardous liquid pipelines. For gas transmission pipelines, PHMSA proposes to consolidate anomaly response schedules and criteria into § 192.714 and remove them from § 192.933 which applies only to gas transmission pipeline subject to integrity management (IM) regulations. As a result, § 192.714 would contain anomaly response criteria for both IM and non-IM gas transmission pipelines.

For hazardous liquid pipelines, the NPRM proposes to amend the anomaly response schedules and criteria for IM pipelines and move them out of § 195.452(h) and into a new § 195.453. For non-IM hazardous liquid pipelines, PHMSA proposes to incorporate by reference into § 195.416 section 9.2.3 of American Petroleum Institute (API) Recommended Practice (RP) 1160. The NPRM explains that incorporating section 9.2.3 would provide operators with a clear response requirement to inform how to comply with the existing general provision in § 195.401(b) requiring operators to "correct any condition that could adversely affect the safe operation of" their pipeline systems.

Revised Anomaly Response Categories. The NPRM proposes to amend existing § 192.714 to create three new anomaly response categories that would apply to both IM and non-IM gas transmission pipelines. These new response categories also would be reflected in proposed new § 195.453 applicable to IM hazardous liquid pipelines.

1. *Immediate conditions*. Consistent with current regulations, immediate conditions require immediate remediation upon discovery.

2. *Near-term conditions*. The NPRM proposes a new "near-term" category of conditions. Near-term conditions require a response within 1 year for IM pipelines and within 2 years for non-IM pipelines. For gas transmission pipelines, near-term conditions would replace existing 1-year and 2-year conditions contained in § 192.933. For IM-hazardous liquid pipelines, codifying the near-term category in proposed new § 195.453 would replace the existing 60-day and 180-day conditions contained in § 195.452(h).

3. *Other conditions*. The NPRM proposes that all other anomalies be treated as "other conditions" that would be either scheduled for response before the next reassessment or monitored during the next scheduled re-assessment.

Response Criteria. Existing §§ 192.712 and 195.452(h) describe how an operator is to evaluate certain anomalies. The NPRM states that advanced engineering-based analyses and modeling methods and use of improved internal inspection (ILI) capabilities enable operators to better characterize the risks posed by specific anomalies, tailor responses based on a pipeline's individual characteristics and operations, and make more informed, risk-based decisions about repairs.

The NPRM proposes to amend § 192.712 and create new § 195.415 to require operators to evaluate and categorize corrosion metal loss, dents and cracks and crack-like anomalies by using engineering-based calculations, including predicted

failure pressure (the calculated maximum pressure a pipeline can withstand before a specific anomaly fails) and fatigue life. Proposed amendments also would expand acceptable models for calculating metal loss and using fracture mechanics for assessing cracks and propose an engineering critical assessment process for evaluating dents.

The NPRM also proposes to revise how operators of gas transmission and hazardous liquid pipelines categorize metal loss, dents, and cracks and crack-like features into the newly-established immediate, near-term, and other conditions for purposes of prioritizing responses.

Notification and No-Objection Process. PHMSA does not propose to amend the notification and no-objection processes of §§ 192.18(c) and 195.18(c) when an operator seeks to use an alternative assessment method or analytical method not provided for in the regulations. The NPRM states that proposals to revise § 192.712(c) and new § 195.415 to more clearly describe PHMSA's expectations for operator procedures, and proposals to codify a greater number of technically proven options for conducting analyses should reduce the need for notifications under §§ 192.18(c) and 195.18(c).

Material Properties and Records. The NPRM emphasizes that records are critical to an operator's ability to perform reliable engineering analyses of anomalies. The NPRM proposes new material properties and recordkeeping requirements for hazardous liquid pipelines and proposes new measures for determining the toughness of a pipeline.

Material Properties for Hazardous Liquid Pipelines. PHMSA proposes to add new § 195.407 which would describe a procedure for hazardous liquid pipeline operators to use if information needed to perform an integrity assessment, evaluate an anomaly or perform a repair to collect is missing. Proposed § 195.407 mirrors existing material verification process of § 192.607 for gas transmission pipelines except that no Part 195 regulation triggers the application of § 195.407 or imposes an obligation to collect such information independently.

PHMSA notes that proposed § 195.407 contains editorial improvements and requests gas pipeline operators to provide comments on whether the edits should be incorporated into existing § 192.607.

Recordkeeping for Hazardous Liquid Pipelines. The NPRM proposes to consolidate recordkeeping requirements into § 195.404. In particular, the NPRM proposes to (1) consolidate into § 195.404 the design and construction-related recordkeeping requirements of § 195.266; (2) add a lifetime record retention requirement for anomaly evaluation calculations performed under §195.405; and (3) require that operators retain material property, pipe design, and pipe components for the life of the pipeline. PHMSA notes that requiring retention of these records applies prospectively, but operators would be required to retain records they currently possess and the records of actions taken to obtain records under proposed § 195.407.

Toughness and Material Property Values. PHMSA proposes to clarify that Charpy v-notch results is not the only valid method for measuring toughness of a pipeline

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(i.e., a material property that measures resistance to facture when a crack is present). The NPRM also proposes to revise the default toughness values.

Discovery of a Condition. The NPRM proposes to clarify the definition of discovery of a condition (§§192.714(b) and 195.453(b)) to expedite discovery of immediate conditions and to align discovery for other anomalies with the receipt of the final ILI report. The discovery of an anomaly requiring a response must occur within 180 days after the date that an ILI tool is retrieved or the date of final observation.

For More Information

Van Ness Feldman counsels clients on pipeline safety compliance, enforcement, litigation under state and federal Pipeline Safety Laws and regulations, and with safety requirements applicable to the transportation of hazardous materials. If you have questions about PHMSA's NPRM or are considering submitting comments, please contact Joseph Hainline, Susan Olenchuk, or any member of the firm's Pipeline & LNG practice group.