

Jeffrey L. Barger
Vice President
Pipeline Operations

Dominion Transmission, Inc.
445 West Main Street, Clarksburg, WV 26301-2450
Mailing Address: P.O. Box 2450
Clarksburg, WV 26302-2450



RECEIVED MAY 04 2012

Handwritten initials "JR" in black ink.

CERTIFIED MAIL

May 1, 2012

Mr. Byron Coy, Jr.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Mountain View Office Park
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2012-5007M

Dear Mr. Coy,

This letter is the formal response by Dominion Transmission, Inc. (DTI) to the Notice of Amendment dated April 2, 2012. The Notice identified four (4) separate inadequacies in regard to DTI's operating and maintenance procedures. The response to each is noted below.

"1. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(2) Gathering of data needed for reporting accidents under Subpart B of this part in a timely and effective manner.

DTI's procedures, Standard Operating Procedure (SOP) 185/46 – General, were inadequate in that they failed to include guidance for gathering of data needed for reporting accidents under Subpart B of this part in a timely and effective manner. The procedures did not include guidance for "§195.49 Annual Report", which addresses annually completing and submitting DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year."

DTI Response:

Item #1 involves two separate issues; procedural guidance for both Accident and Annual Reporting.

Accident Reporting

Accident Reporting is not covered under DTI procedure *SOP 185/46 – General*. Rather, this topic is addressed separately in *SOP 185/03 – Accident Reports*. For your reference, a copy of this procedure is included with this response in Appendix A.

Annual Reports

Investigation of this issue revealed that the procedure in question had been truncated during the implementation of DTI's new document management system (Documentum). DTI addressed the deficiency by revising its *SOP 185/46 – General* to include guidance for the submittal of Annual Reports as required by §195.49. A copy of the revised procedure was provided to Mr. Robert Burrough (Inspector) via email on November 17, 2011. For your reference, a copy of the most recently revised procedure is included with this response in Appendix B.

“2. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

DTI's procedures, SOP 185/34 - Pressure Testing, were inadequate in that they failed to require that records be kept of the temperature of the test medium or pipe during the pressure test period as per §195.310(b)(10) - The record required by paragraph (a) of this section must include: Temperature of the test medium or pipe during the test period.”

DTI Response:

Investigation of this issue revealed that the procedure in question had been truncated during the implementation of DTI's new document management system (Documentum). DTI addressed the deficiency by revising its *SOP 185/34 – Pressure Testing* to include the proper record-keeping requirements as noted in §195.310. For your reference, a copy of this revised procedure is included with this response in Appendix C.

“3. §195.402 Procedural manual for operations, maintenance, and emergencies.

(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs;

DTI’s emergency response training procedures, which includes SOP 185/42 – Training, SOP 185/24 – Emergency Plans and the DTI Emergency Plan, were inadequate in that they failed to require and verify that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under §195.402 for which they are responsible to ensure compliance as per §195.403(c).”

DTI Response:

In regard to Item #3, DTI would like to point out that its procedures do require that the knowledge of its supervisory personnel is verified in regard to its emergency procedures. Specifically, DTI *SOP 185/42 – Training* Section II(C) states:

- C. To ensure compliance, DTI shall require and verify that its supervisors maintain a thorough knowledge of those procedures for which they are responsible.

Annually, at intervals not exceeding 15 months, each employee (including supervisory personnel) is trained on the requirements of DTI’s Emergency Plan. That training includes a graded exam that serves as verification that each employee understands his or her responsibilities during an emergency situation. The training addresses specific scenarios in regard to hazardous liquid emergency response, as well as the roles and responsibilities of each employee.

“4. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

DTI’s mainline valve inspection procedures, which includes OQ-071-GL and the on-line

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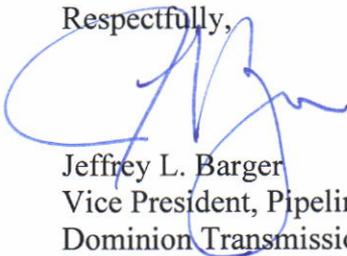
Inspection History Detail Listing for Valve Inspection, were inadequate in that they failed to provide a process to document that the mainline valves were functioning properly as per §195.420(b). The Inspection History Detail Listing for Valve Inspection form's field entitled "Power Operator" was creating confusion among company personnel as to whether the valve was functioning properly."

DTI Response:

The review of inspection records for valve maintenance revealed an inconsistency among operating personnel when completing the "Power Operator" field on DTI's valve inspection form. The field is meant to serve as an indication as to the whether the valve is *equipped* with a power operator. Rather, the question was at times misinterpreted to mean that the inspection was actually conducted through the *use* of the power operator. Though this question was not answered consistently, the forms do indeed indicate that the valves were checked for operability as required by §194.420(b). To eliminate confusion, DTI is revising its inspection form to remove the "Power Operator" question.

If you have any questions, or should require additional information, please do not hesitate to contact Shawn Miller at (304) 627-3404.

Respectfully,



Jeffrey L. Barger
Vice President, Pipeline Operations
Dominion Transmission, Inc.

Appendix A



SECTION: 185 / Hazardous Liquid Pipeline Facilities
SOP: 03 – Accident Reports

EFFECTIVE DATE: 7/10/2000
REVISION DATE: 12/16/2011

I. SCOPE

This procedure provides regulatory reporting requirements for “accidents” involving hazardous liquid pipelines.

NOTE: The Pipeline Integrity Section is responsible for the telephonic reporting of accidents and the preparation of necessary written reports. Therefore, immediately upon discovery of a *potential* reportable accident, contact the Pipeline Integrity Department.

II. REPORTABLE ACCIDENT

- A. A reportable “*accident*” is a release of a hazardous liquid resulting in any of the following:
1. An explosion or fire not intentionally set by the Company.
 2. Release of 5 gallons (19 liters) or more of hazardous liquid except that no report is required for a release of less than 5 barrels (0.8 cubic meters) resulting from a pipeline maintenance activity if the release:
 - a. has not resulted in the pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines.
 - b. is confined to DTI’s property or pipeline right-of-way and cleaned up promptly.
 3. The death of any person or a personal injury requiring hospitalization.
 4. Estimated property damage, including the cost of cleanup and recovery, value of lost product, and damage to DTI’s property or others, or both, exceeding \$50,000.

NOTE: In the event of any accident involving potential harm to the environment, refer to Environmental SOP 120-23 Spill Reporting and Notification.

NOTE: For reportable accidents where control room actions cannot be ruled out as contributing factors, refer to the "Hastings Gas Processing Plan Control Room Management Plan", Section 9 for additional investigation requirements.

- B. Even though an accident may not meet the criteria of Part II. A., there may be an event or accident, which in the judgment of DTI, should be reported. Items to consider when determining if an event or accident may be reportable include, but are not limited to, the following:
1. Rupture or explosion.
 2. Fire.
 3. Evacuation of people in the area of a pipeline.
 4. Involvement of local emergency response personnel.
 5. Degree of media involvement.

III. TELEPHONIC REPORTING

- A. At the earliest practicable moment following discovery of a reportable accident, telephonic notice shall be made to the National Response Center at 1-800-424-8802 and the appropriate state agency. Notification should be made within two (2) hours, unless extenuating circumstances necessitate a longer duration. Refer to the State/Federal Reporting Information chart for applicable state telephone numbers.
- B. Telephonic reporting shall include the following information:
1. Names of Company and person making report and their phone numbers.
 2. Location of the accident (city, township or borough, county, state, and street address).
 3. Time of the accident (date and hour).
 4. Number of fatalities and personal injuries, if any.

- 5. All other known significant facts relevant to the cause of the accident or extent of the damages.
- C. In the event a telephonic report has been made and further investigation reveals that the situation was not a reportable accident, the telephonic report should be nullified with a letter. The letter should be sent to the Information Resources Manager and/or the appropriate state agency within 30 days of the situation. Refer to the State/Federal Reporting Information chart for applicable addresses. The letter should reference the telephonic report number received when the initial notification was made and briefly explain why the telephonic report is being nullified.

IV. WRITTEN REPORTS

- A. As soon as practicable, but not more than 30 days after detection of a reportable accident, a written report, using DOT Form 7000-1, shall be submitted to the US Department of Transportation and the appropriate state agency. Refer to the State/Federal Reporting Information chart for applicable addresses.
- B. When additional relevant information is obtained after the accident report is submitted, a supplemental report shall be filed within 30 days.

V. INCIDENT REPORT PREPARATION

- A. Instructions for preparing the DOT Form 7000-1 can be found by accessing the DOT "Forms" web page: http://ops.dot.gov/forms/Liq_accident_instructions.pdf.

VI. RECORDS AND ASSISTANCE

- A. If the Department of Transportation conducts an investigation of an accident, all records and information that in any way pertain to the accident shall be made available to the DOT representative. Also, all reasonable assistance shall be provided in the accident investigation.



Environmental:	<u>120-23 Spill Reporting and Notification</u>
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Safety:	
Work Procedures:	
Chart / Graphs / Drawings / Lists:	<ul style="list-style-type: none"> • <u>Liquid Lines</u> • <u>State/Federal Reporting Information</u>
Forms:	<u>DOT Form F 7000-1</u>
Corrosion Manual:	
Regulations:	<p>DOT 49 CFR 195.50 DOT 49 CFR 195.52 DOT 49 CFR 195.54 DOT 49 CFR 195.58 DOT 49 CFR 195.60 DOT 49 CFR 195.62 DOT 49 CFR 195.63</p>
Interpretations:	

Appendix B



SECTION: 185 / Hazardous Liquid Pipeline Facilities
SOP: 46 / General

EFFECTIVE DATE: 9/06/2006
REVISION DATE: 12/16/2011

I. SCOPE

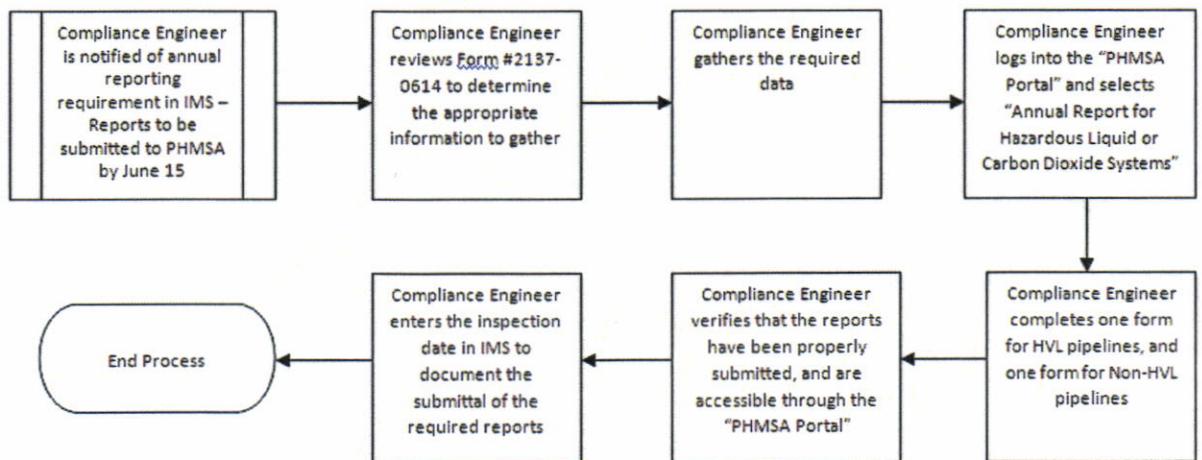
This procedure outlines the scope of the Standard Operating Procedures for Hazardous Liquid Pipelines

II. GENERAL

1. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be accessible at locations where operations and maintenance activities are conducted. The manual includes SOP Section 185, and all referenced procedures and guidelines within.
2. A pipeline may not be operated or maintained at a level of safety lower than that required by Section 185, Hazardous Liquid Pipelines, of the Dominion Transmission, Inc., Standard Operating Procedures.
3. All repairs performed on hazardous liquid pipelines shall be in accordance with DTI's **Pipeline Repair Manual**. All repairs shall be performed in a manner that is safe, and prevents damage to persons or property.
4. Except as provided by **Hazardous Liquid Facilities SOP 185-36 Reinstating Pipelines**, a pipeline may not be operated unless it was designed and constructed in accordance with 49 CFR Part 195. See **Liquid Lines**.
5. Section 185, Hazardous Liquid Pipelines, does not apply to:
 - a. Any pipeline transporting a hazardous liquid through onshore production (including flow lines), refining, manufacturing facilities, storage, or in-plant piping systems associated with such facilities, including:
 - (1) Hastings Extraction Plant;

- (2) Galmish Tank Car Loading Facilities;
- (3) Galmish Truck Loading Facilities;
- (4) NGL Storage Tanks at Hastings;
- (5) Bens Run gasoline tank and barge loading facility, including all piping in between both locations.
- (6) Copley Extraction Plant
- (7) West Union Extraction Plant
- (8) Charleroi Propane Terminal and Associated Pipeline
- (9) Lightburn Extraction Plant

III. PROCESS FOR SUBMITTAL OF ANNUAL REPORTS



Detailed Process Narrative:

- Compliance Engineer receives notification through the Inspection Monitoring System (IMS) that the “Annual Report for Hazardous Liquid or Carbon Dioxide Systems” must be submitted to the Pipeline and Hazardous Materials Safety Administration (PHMSA) by June 15. This notification takes place in January of the same year.
- Compliance Engineer then reviews the Report Form (2137-0614) to determine what information must be gathered, such as:
 - Physical Pipeline Information
 - Assessment History
 - Repair Actions Taken

- Compliance Engineer gathers the necessary information from:
 - Drafting and Records Department
 - GIS
 - Liquid Integrity Management Program
- Compliance Engineer logs onto the “PHMSA Portal” application located on the PHMSA website, and selects “Annual Report for Hazardous Liquid or Carbon Dioxide System.”
- Compliance Engineer completes one form for HVL Pipelines and one form for Non-HVL pipelines. The pipeline numbers are:
 - HVL
 - G-129
 - G-130
 - G-131
 - G-134
 - G-136
 - Non-HVL
 - EC-3
 - G-143
- Compliance Engineer verifies that the reports have been properly submitted, and the submittal date is accurately reflected in the “PHMSA Portal” application.
- Compliance Engineer enters the inspection date in IMS in order to document the submittal of the Annual Reports. – End of Process

III. RECORDS

- A. A review of this manual will be conducted each year, at intervals not exceeding 15 months. The annual review shall be documented in the Inspection Monitoring System (IMS). Revisions will be recorded each year on the appropriate SOP Change Matrix.

[2006 SOP Change Matrix](#)
[2007 SOP Change Matrix](#)
[2008 SOP Change Matrix](#)
[2009 SOP Change Matrix](#)
[2010 SOP Change Matrix](#)
[2011 SOP Change Matrix](#)



Environmental:	
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Safety:	
Work Procedures:	
Chart / Graphs / Drawings / Lists:	
Forms:	
Corrosion Manual:	
Regulations:	
Interpretations:	

Appendix C



SECTION: 185 / Hazardous Liquid Pipeline Facilities
SOP: 34 / Pressure Testing

EFFECTIVE DATE: 7/10/2000
REVISION DATE: 12/16/2011

I. SCOPE

This procedure provides pressure testing requirements for Hazardous Liquid pipelines.

II. GENERAL REQUIREMENTS

- A. Except as otherwise provided in this procedure, a hazardous liquid pipeline may not be operated until it has been pressure tested without leakage in accordance with this procedure. Also, a section of pipeline that has been replaced, relocated, or otherwise changed may not be returned to service until it has been pressure tested without leakage in accordance with this procedure.
- B. Except for pipelines reinstated in accordance with [Hazardous Liquid Pipeline Facilities SOP 185-36 Reinstating Pipelines](#), the following pipelines may be operated without pressure testing:
 - 1. Any hazardous liquid pipeline whose maximum operating pressure is established in accordance with Part II. A. 5. of [Hazardous Liquid Pipeline Facilities SOP 185-29 Maximum Operating Pressure](#) that is:
 - a. An interstate pipeline constructed before January 8, 1971;
 - b. An intrastate pipeline constructed before October 21, 1985; or
 - c. A low-stress pipeline constructed before August 11, 1994, that transports hazardous liquid. A "*low-stress pipeline*" is a hazardous liquid pipeline operated in its entirety at a stress level of 20 percent or less of SMYS of the line pipe.

III. TESTING COMPONENTS AND TIE-INS

- A. Each pressure test shall include all pipe and attached fittings, including components, unless otherwise permitted as follows:

1. A component, other than pipe, that is the only item being replaced or added to the pipeline section does not require hydrostatic testing if the manufacturer certifies that either:
 - a. The component was hydrostatically tested at the factory; or
 - b. The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was subjected to a hydrostatic test at the factory.
2. Pipe associated with tie-ins shall be pressure tested with the section to be tied-in or separately.

IV. TEST PRESSURE

- A. The test pressure shall be maintained throughout the pipeline section being tested for at least four (4) continuous hours at a pressure equal to at least 125 percent of the maximum operating pressure.
- B. If the pipeline section is not visually inspected for leakage during the test, the test pressure shall be maintained throughout the pipeline section being tested for at least four (4) continuous hours at a pressure equal to 125% of the maximum operating pressure, AND the test pressure shall be maintained for at least an additional four (4) continuous hours at a pressure equal to at least 110% of the maximum operating pressure. A total test duration of eight (8) hours minimum.

V. TEST MEDIUM

- A. Water shall be used as the test medium except as follows:
 1. Liquid petroleum that does not vaporize rapidly may be used as the test medium if:
 - a. The entire pipeline section under test is outside of cities and other populated areas;
 - b. Each building within 300 feet of the test section is unoccupied while the test pressure is equal to or greater than a pressure which produces a hoop stress of 50 percent of SMYS;
 - c. The test section is kept under surveillance by regular patrols during the test; and

- d. Continuous communication is maintained along the entire test section.
- B. Air or inert gas may be used as the test medium in low-stress pipelines. A low-stress pipeline is defined as a hazardous liquid pipeline that is operated in its entirety at a stress level of 20 percent or less of the SMYS of the line pipe.

VI. RECORDS

- A. Pressure tests shall be recorded utilizing the [Pressure Test Application](#). Records of pressure test shall be retained for the useful life of the pipeline and shall include:
 - 1. The pressure recording charts and instrument calibration data;
 - 2. The Company name, the name of the person responsible for making the test, and the name of the test Company used, if any;
 - 3. The date and time of the test;
 - 4. The minimum test pressure and test medium;
 - 5. A description and drawing of the facility tested and the test apparatus;
 - 6. An explanation of any pressure discontinuities, including test failures, that appear on the pressure recording charts;
 - 7. Where elevation differences in the section under test exceed 100 feet, a profile of the pipeline showing the elevation and test sites over the entire length of the test section;
 - 8. Temperature of the test medium or pipe during the test period.
- B. Recording charts and other documentation must contain the following information:
 - 1. Test Report Number
 - 2. Date of Test
 - 3. Project Name / WBS Element
 - 4. Time on / Time off
 - 5. Recorder Number
 - 6. Test Pressure Min / Max
 - 7. Signature of responsible person performing test.

Environmental:	
Safety:	<ul style="list-style-type: none"> - <u>360-07 Portable Fire Extinguishers</u> - <u>360-15 Prevention of Accidental Ignition of Liquefied Petroleum Gas</u> - <u>360-16 Lockout/Tagout</u> - <u>360-19 Personal Protective Equipment</u>
Work Procedures:	<ul style="list-style-type: none"> - <u>OQ-068-GL (IMP) Performing a Pressure Test on Gas or Liquids Pipeline Facility</u>
Chart / Graphs / Drawings / Lists:	<ul style="list-style-type: none"> - <u>Liquid Lines</u>
Forms:	<ul style="list-style-type: none"> - <u>Pressure Test Application</u> - <u>Pressure Test Application Job Aid</u>
Corrosion Manual:	
Regulations:	<ul style="list-style-type: none"> - DOT 49 CFR 195.300 - DOT 49 CFR 195.302 - DOT 49 CFR 195.304 - DOT 49 CFR 195.306 - DOT 49 CFR 195.308 - DOT 49 CFR 195.310
Interpretations:	