

Dominion Transmission, Inc.
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CERTIFIED MAIL

January 14, 2014

Mr. Byron Coy, P.E
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2013-1025M

Dear Mr. Coy,

This letter is the formal response by Dominion Transmission, Inc. (DTI) to Notice of Amendment (NOA) CPF 1-2013-1025M dated November 20, 2013.

“1. §192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

DTI's O&M procedure section 060/Compressor stations SOP 17/Storage of Flammables and combustibles is inadequate since it does not define a safe distance from the compressor building for storing surplus combustible materials. Surplus combustible materials are material quantities beyond those required for every day, or normal use, in the compressor building.”

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DTI Response:

DTI requested a copy of the case materials concerning this NOA to assist in understanding the concern noted with the verbiage in SOP 060/017 (Compressor Stations / Storage of Flammables and Combustibles). Unfortunately, no case materials are available for DTI's review that explains the inspector's concerns. DTI is proposing to revise SOP 060/017 to reflect that flammable or combustible materials should not be stored within 10 feet of the compressor building.

DTI is proposing to modify the first paragraph under "Storage of Flammables and Combustibles" of SOP 060/017 as noted below:

- ~~A. Flammable or combustible materials in quantities beyond those required for everyday or normal use in the compressor building shall be stored a safe distance from the compressor building.~~
- A. Flammable or combustible materials (i.e., wooden pallets, cardboard boxes, paints, solvents or similar materials) in quantities beyond those required for everyday use or other than those normally used in compressor buildings, should not be stored within 10 feet of the compressor building.

If you have any questions, or should require additional information, please do not hesitate to contact Eric Taylor at (304) 627-3034.

Respectfully,



Brian C. Sheppard
Vice President, Pipeline Operations
Dominion Transmission, Inc.