



U.S. Department  
Of Transportation  
**Pipeline and  
Hazardous Materials  
Safety Administration**

820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628  
**609.989.2171**

## NOTICE OF AMENDMENT

### OVERNIGHT EXPRESS MAIL

December 23, 2013

Shawn L. Patterson  
President Engineering & Project Development  
Columbia Gas Transmission Corp.  
1700 MacCorkle Avenue, SE  
Charleston, WV 25314

**CPF 1-2013-1036M**

Dear Mr. Patterson:

Between July 23-31, 2012, inspectors from the New York State Department of Public Service (NYSDPS), acting as agents for the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Columbia Gas Transmission Corporation (CGT) Millennium Pipeline facilities procedures for field related operations and maintenance procedures at the Owego M&R facility in Owego, Tioga County, NY.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within CGT's plans or procedures, as described below:

- 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.**

CGT's manual of written procedures was inadequate in that it did not have sufficient guidance for handling abnormal operations as required by 192.605(a).

Specifically, the manual did not include detailed procedures as required in 192.605(c)(1) which states:

- (c) Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

- (1) Responding to, investigating, and correcting the cause of:
  - (i) Unintended closure of valves or shutdowns;
  - (ii) Increase or decrease in pressure or flow rate outside normal operating limits;
  - (iii) Loss of communications;
  - (iv) Operation of any safety device; and,
  - (v) Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property.

CGT's Abnormal Operations Reporting Procedure 220.005.003 Version 6 Effective 02232011, Section 2.0 provides guidance in the following areas:

1. Identify the Abnormal Operation
2. Returning the Facilities to Service
3. Contact Record
4. Property Damage and Personal Liability
5. Review Abnormal Operation Investigation
6. Effectiveness of the Procedures

However, none of the guidance provided in the areas noted above adequately address the requirements stated in 192.605(c)(1). Specifically, the procedure does not provide details on the following items:

1. Responding to, investigating, and correcting the cause of:
  - a. Unintended closure of valves or shutdowns;
  - b. Increase or decrease in pressure or flow rate outside normal operating limits;
  - c. Loss of communications;
  - d. Operation of any safety device; and,
  - e. Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property.
2. Guidance detailing:
  - a. The roles and responsibilities of the CGT personnel as it relates to AOC response and investigation
  - b. Who should respond to an AOC.
  - c. When is an AOC investigation required?
  - d. What are the elements of the investigation?
  - e. When is a root cause analysis required?
  - f. What constitutes an adequate description to explain the Abnormal Operation?
  - g. Who should conduct, review and approve an AOC investigation?
  - h. How should the AOC investigation be documented?

#### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with

the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within **30 days** of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that CGT maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to, as well as any correspondence relating to this Notice to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 120131036** on each document you submit, and please provide a (signed) copy in electronic format whenever possible. Smaller files may be emailed to [Byron.Coy@dot.gov](mailto:Byron.Coy@dot.gov). Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Byron Coy, PE  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Cc: Kevin Speicher NYSDPS

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*