



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

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

## WARNING LETTER

### EXPRESS OVERNIGHT DELIVERY

May 27 2015

Brian Sheppard  
Vice President, Pipeline Operations  
Dominion Transmission, Inc.  
445 West Main Street  
Clarksburg, WV 26302-2450

**CPF 1-2015-1011W**

Dear Mr. Sheppard:

Between September 9, 2013 to March 31, 2014, representatives of the West Virginia Public Service Commission (WV PSC), acting as agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Dominion Transmission, Inc. (DTI) facilities and records in the Bridgeport, Lightburn operating area of WV.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

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 once 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 failed to follow its operations and maintenance (O&M) procedures which address atmospheric corrosion protection of piping at the soil to air interface.

During the inspection, the WV PSC inspectors reviewed the DTI atmospheric corrosion procedures and the last two atmospheric corrosion inspection records at the Bridgeport Compressor station regarding the pipe leading to valve number 516-09. The last DTI atmospheric corrosion inspection was conducted on 11/29/2012. None of the records identified the pipe-to-soil interface corrosion on the piping observed and shown in the WV PSC photographic evidence.

2. §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 once 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 failed follow their procedure for calculating the capacity of relief valves. Dominion Transmission, Inc. Relief Valve and Regulator Calculator Operation Manual dated January 11, 2010 Paragraph 1.1.3. states “Model input data includes a full description of the valve installation (i.e. description of upstream and downstream pipe configuration). Calculation includes pressure loss through upstream and downstream pipe to estimate valve flow capacity.”

During the inspection, the WV PSC reviewed DTI records from 2009 through 2013. The table below identifies the stations and devices where DTI failed to consider the length/size of inlet piping and / or failed to consider the length/size of outlet piping when calculating the capacity of the relief valves.

Station	Device	Inspect Date	Inlet piping data entered?	Outlet piping data entered?
XSN-1847 White Day	101-003	5/13/2009	No	No
		5/17/2010	No	No
		7/11/2011	No	Yes
		9/5/2012	No	No
		9/6/2013	No	No
XSN-2138 W.E. Cross (Exhibit 14)(Unit 1701)	101-002	5/18/2009	No	No
		5/20/2010	No	No
		7/12/2011	No	Yes
		9/5/2012	Yes	No
		9/9/2013	No	Yes
	101-005	5/18/2009	No	No
		5/20/2010	No	No
		7/12/2011	Yes	Yes
		9/5/2012	Yes	Yes
		9/9/2013	No	Yes
	101-007	5/18/2009	No	No
		5/20/2010	No	No
		7/12/2011	No	Yes
		9/5/2012	Yes	No
		9/9/2013	No	Yes

XSN-1719 Sylvester	101-007	7/12/2011	No	Yes
		10/5/2012	No	Yes
		9/9/2013	No	Yes
	101-008	7/12/2011	No	Yes
		10/5/2012	No	Yes
		9/9/2013	No	Yes
XSN-1709 Twilight	101-007	7/12/2011	Yes	Yes
		10/5/2012	Yes	Yes
		9/9/2013	No	Yes
		10/2/2013	No	Yes
XSN-1801 Auburn	101-003	6/7/2011	No	Yes
		8/19/2012	Yes	Yes
		8/13/2013	No	Yes
		1/6/2014	No	Yes

**3. §192.743 Pressure limiting and regulating stations: Capacity of relief devices.**

**(b) If review and calculations are used to determine if a device has sufficient capacity, the calculated capacity must be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates. After the initial calculations, subsequent calculations need not be made if the annual review documents that parameters have not changed to cause the rated or experimentally determined relieving capacity to be insufficient.**

DTI failed to properly calculate the relief valve capacity for Relief Valve 003 (RV-003) at regulator station XS-1979. According to DTI, RV-003 is the primary over pressure protection device for the regulator station. During the inspection, WVPSC staff reviewed relief valve capacity calculations for RV-003 from 2009 through 2013.

The DTI records indicated that the capacity of RV-003 was 69,000 Standard Cubic Feet per Hour (SCFH). After additional communications between WV PSC inspectors and DTI, DTI explained that someone at DTI must have mistyped the capacity number from the relief device manufacturer's capacity chart when entering the data into the DTI record for RV-003. The correct capacity of RV-300 should have been 40,000 SCFH, and not 60,000 SCFH.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Dominion Transmission, Inc. being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 1-2015-1011W** on each document you submit, and please whenever possible provide a signed PDF copy in electronic format. 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 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: Mary Friend, WV PSC