



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

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609.989.2171

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

July 29, 2015

Robert Cooper
Vice President of Engineering
EQT Midstream
625 Liberty Avenue
Pittsburgh, Pennsylvania 15222

CPF 1-2015-1016M

Dear Mr. Cooper:

From May 5, 2014 through May 23, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected EQT Midstream's (EQT) Operations and Maintenance procedures in Pittsburgh, Pennsylvania.

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

- 1. §192.605 Procedural manual for operations, maintenance, and emergencies.**
(e) Surveillance, emergency response, and accident investigation. The procedures required by §192.613(a), 192.615, and 192.617 must be included in the manual required by paragraph (a) of this section.

EQT's written procedures were inadequate in that they failed to describe what training was to be provided on the emergency procedures, and how the effectiveness of that training was to be verified as prescribed in §192.615(b)(2).

During the inspection, the PHMSA inspector reviewed EQT's Emergency Plan Procedure Revision 18 dated March 13, 2014. Section 6.0 (Training and Review) of the procedure states that training is being conducted, but it fails to mention how training takes place, and what

methods are utilized to conduct and document the training. The procedure also fails to adequately describe how the effectiveness of the training is verified.

2. §192.605 Procedural manual for operations, maintenance, and emergencies.

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

(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.

EQT's corrosion control procedures were inadequate in that they failed to address how the amount of cathodic protection is controlled so as not to damage the protective coating or the pipe as it relates to §192.463(c).

During the inspection, the PHMSA inspector reviewed corrosion pipe-to-soil readings for EQT jurisdictional pipelines in PA and WV from 2011 through 2014. The inspector noted that some instant off readings were more negative than -1.2 volts. The inspector asked the operator if it was aware of guidance material that suggested that these types of readings may lead to disbonded coating on the pipe. EQT's Corrosion Specialist for the West Virginia area stated that EQT was aware of this possibility, and that EQT investigates when it finds readings that are more negative than -1.2 volts.

Subsequently, the PHMSA inspector reviewed EQT's corrosion control procedures in the O&M Manual – Section 8 “Corrosion Control”, dated October 2009. Specifically, Sections 8.1 through 8.6 were reviewed to verify whether the investigation of these low readings was described. The PHMSA inspector found no description in the procedures. The PHMSA inspector requested records of one of these investigations, but was told by EQT's Compliance Specialist that none were available because there has not been an investigation of a reading more negative than -1.2 volts to date. The PHMSA inspector requested any other procedures that cover this type of investigation. EQT stated that there were no procedures written that cover how to conduct this type of investigation.

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 60 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 EQT maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Byron Coy, PE, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2015-1016M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

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