

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 11, 2014

Mr. Samuel Dozier
Vice President, Operations
Carolina Gas Transmission
220 Operations Way
Cayce, SC 29033

CPF 2-2014-1004M

Dear Mr. Dozier:

On July 30-31, 2014, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Southern Region, Office of Pipeline Safety (OPS) inspected the Carolina Gas Transmission (CGT) Pipeline Public Awareness Plan and Operator Qualification Plan at CGT's office in Cayce, South Carolina, pursuant to Chapter 601 of 49 United States Code.

On the basis of the inspection, PHMSA has identified apparent inadequacies within the CGT written Pipeline Public Awareness Plan and Operator Qualification Plan as described below:

1. §192.616 Public awareness.

(a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see § 192.7).

CGT's written Pipeline Public Awareness Plan (PPAP) did not provide procedures for conducting an annual audit or review to determine whether the program had been developed and implemented in accordance with API RP 1162.

API RP 1162, *Section 8.3 Measuring Program Implementation*, requires an operator to complete an annual audit or review of whether the program has been developed and implemented according to the API RP 1162 guidelines. While CGT's PPAP stated the SCANA Public Awareness Committee will: "*Ensure annual reviews of program implementation are conducted using third party audits and/or, internal self-assessments and/or regulatory inspections,*" it did not provide procedures on how the annual reviews were to be conducted.

2. §192.805 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

... (b) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;

CGT's Operator Qualification (OQ) Plan did not include a span of control number for all covered tasks.

CGT's OQ Plan, *Appendix 1-Covered Task List Matrix*, identified how many non-qualified individuals could perform a given covered task under the direction and observation of an individual qualified to perform the task. The Appendix listed a span of control number for each of CGT's identified covered tasks except the covered task for Pipeline Pigging (i.e. 107PIG). Instead, the span of control number for covered task 107PIG was listed as a question mark (?).

3. §192.805 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

... (g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed;

CGT's Operator Qualification (OQ) Plan did not include a re-evaluation interval for all covered tasks.

CGT's OQ Plan, *Appendix 1-Covered Task List Matrix*, identified the intervals at which the evaluation of an individual's qualifications is needed for covered task for each of CGT's identified covered tasks except the covered task for Pipeline Pigging (i.e. 107PIG). Instead, the evaluation interval for covered task 107PIG was listed as a question mark (?).

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 inadequacy

identified herein has been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Carolina Gas Transmission maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Wayne T. Lemoi, Director, Southern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 2-2014-1004M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Wayne T. Lemoi
Director, Office of Pipeline Safety
PHMSA Southern Region

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