



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

### UPS OVERNIGHT DELIVERY

May 5, 2011

Jeffrey Barger, Senior V.P.  
Dominion Transmission, Inc.  
445 West Main St.  
Clarksburg, WV 26301

Dear Mr. Barger:

**CPF 1-2011-3001W**

During the week of November 15, 2010, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Dominion Cove Point Liquefied Natural Gas Plant (DCPLNG) in Lusby, Maryland.

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

**1. 193.2503 Operating procedures.**

**Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety . . .**

Operator's procedure Section 20 SOP 01, Cool-down-Leak Checks, states that the steps performed during cool-down will be completed on Form CP0002 Cool-down Checklist, and this will be retained as the cool-down document. The operator has not been completing, reviewing or filing the form as required by its procedure.

The violation is based upon a review of Section 20 SOP 01 which requires the Lead LNG Technician to complete Form CP0002. The procedure requires the Supervisor of LNG Operations to review the Form CP0002 for accuracy and completeness; then to submit the documentation to the Coordinator of Office Services for filing in the Plant Maintenance Records. The operator presented a copy of a blank Form CP0002, but had no completed form on file to document any cool-down on record.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. Also, for LNG facilities, an additional penalty of not more than \$50,000 for each violation may be imposed. 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 identified in this letter. Failure to do so will result in DCPLNG being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, please address your correspondence to Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Rd, Suite 103, W. Trenton, NJ, 08628 and please refer to **CPF 1-2011-3001W**. 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).

Sincerely,

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