



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

820 Bear Tavern Road, Suite 306  
West Trenton, NJ 08628  
**609.989.2171**

## **WARNING LETTER**

### **EXPRESS OVERNIGHT DELIVERY**

October 02, 2009

Mr. Victor Gaglio  
Sr. Vice President of Operations & Engineering  
Columbia Gas Transmission Company  
1700 MacCorkle Avenue, S.E.  
P.O. Box 1273  
Charleston, WV 25314

**CPF 1-2009-1008W**

Dear Mr. Gaglio:

On June 9 to 13, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code conducted an inspection on your Port Jervis, NJ/PA facilities portion of the transmission pipelines for jurisdictional compliance under Title 49, Code of Federal Regulations, Section §192.

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

- 1. §192.481 (c) Atmospheric corrosion control: Monitoring.**  
**(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by Sec. 192.479.**

Section §192.481(c) requires that if atmospheric corrosion is found, protection against corrosion must be provided.

At the time of inspection, a field review of the operator's Easton compressor station revealed atmospheric corrosion on station pipes and coating failure on a compressor station heater.

2. **§192.605 (b) (3) Procedural manual for operations, maintenance, and emergencies**  
**(3) Making construction records, maps, and operating history available to appropriate operating personnel.**

Section §192.605 (b) (3) requires that operators maintain their pipeline maps.

No updated pipeline maps were available. The legend on an available map – CGT Asset Group 13 at the time of inspection, was dated December 1999. The operator stated that at the time, updated maps showing piping changes were being worked on.

3. **§192.707 Line markers for mains and transmission lines.**

**(a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:**

**(1) At each crossing of a public road and railroad; and**

**(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.**

Section §192.707(a) (2) requires that operators provide and maintain line markers necessary to reduce the possibility of damage or interference.

In the vicinity of Weber Rd, Mount Pleasant Rd, and Cummings Road, there were long expanses of right-of-way with an inadequate number of line markers.

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. 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 Columbia Gas Transmission Company being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2009-1008W**. 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