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

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

NOTICE OF AMENDMENT

UPS OVERNIGHT DELIVERY

April 2, 2012

Mr. Jeffrey Barger
Vice President of Pipeline Operations
Dominion Transmission, Inc.
P.O. Box 2450
445 West Main Street
Clarksburg, WV 26301

CPF 1-2012-5007M

Dear Mr. Barger:

From October 17 to 21, 2011, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Dominion Transmission, Inc. (DTI) interstate propane pipeline system for 49 CFR Part 195 requirements in Clarksburg, West Virginia.

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

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

   (c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:
   (2) Gathering of data needed for reporting accidents under Subpart B of this part in a timely and effective manner.

DTI's procedures, Standard Operating Procedure (SOP) 185/46 – General, were inadequate in that they failed to include guidance for gathering of data needed for reporting accidents under Subpart B of this part in a timely and effective manner. The procedures did not include guidance for "§195.49 Annual Report", which addresses annually completing and submitting DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year.

2. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

   (a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal

operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

DTI's procedures, SOP 185/34 - Pressure Testing, were inadequate in that they failed to require that records be kept of the temperature of the test medium or pipe during the pressure test period as per §195.310(b)(10) - The record required by paragraph (a) of this section must include: Temperature of the test medium or pipe during the test period.

3. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

   (e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs;

DTI's emergency response training procedures, which includes SOP 185/42 – Training, SOP 185/24 – Emergency Plans and the DTI Emergency Plan, were inadequate in that they failed to require and verify that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under §195.402 for which they are responsible to ensure compliance as per §195.403(c).

4. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

   (a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

DTI's mainline valve inspection procedures, which includes OQ-071-GL and the on-line Inspection History Detail Listing for Valve Inspection, were inadequate in that they failed to provide a process to document that the mainline valves were functioning properly as per §195.420(b). The Inspection History Detail Listing for Valve Inspection form's field entitled "Power Operator" was creating confusion among company personnel as to whether the valve was functioning properly.

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 **60** 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 your 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 thirty (30) 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 DTI maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to, as well as any correspondence relating to this Notice to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 1-2012-5007M** on each document you submit, and please provide a (signed) copy in electronic format whenever possible. Smaller files may be emailed to Byron.Coy@dot.gov. Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Sincerely,

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

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