



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

OVERNIGHT EXPRESS MAIL

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 1-2012-5006W

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.

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 items inspected and the probable violation(s) are:

- 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:**
 - (13) Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.**

CPF 1-2012-5006W

DTI's procedures failed to provide a process to ensure that the approved changes to the procedures were included in the revised procedures. During a records review to verify that periodic review of procedures was being performed, it was noted that changes requested and approved by DTI personnel to procedure "OQ-016-GL – Performing Rectifier Inspection" on DTI's "Procedure Observation" form, dated November 16, 2009, had not been included on the most recent revision.

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 Dominion Transmission, Inc. 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 1-2012-5006W**. 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