



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

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NOTICE OF AMENDMENT

OVERNIGHT EXPRESS MAIL

February 27, 2014

Shawn Patterson
Columbia Gas Transmission Corporation
1700 MacCorkle Ave., SE
Charleston, WV 25314

CPF 1-2014-3001M

Dear Mr. Patterson:

During the week of November 13, 2012, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Columbia Gas Transmission's (Columbia) procedures for Chesapeake LNG Plant in Chesapeake, Virginia.

On the basis of the inspection, PHMSA has identified apparent inadequacies within Columbia's plans or procedures, as described below:

1. §193.2509 Emergency procedures.

(a) . . .

(b) To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency, each operator must follow one or more manuals of written procedures. The procedures must provide for the following: . . .

(3) Coordinating with appropriate local officials in preparation of an emergency evacuation plan, which sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG storage tank.

Columbia's LNG emergency plan is inadequate in that it lacks sufficient detail for coordinating with appropriate local officials in preparation of an emergency evacuation plan. Columbia's O&M, Titled "193.2509(b), Chesapeake LNG Emergency Plan", details its meetings with local officials to review and update the Emergency Evacuation Plan. There is no frequency stated in the Emergency Plan to contact the local officials to meet this goal.

2. §193.2513 Transfer procedures.

(a) . . .

(b) The transfer procedures must include provisions for personnel to: . . .

(6) Manually terminate the flow before overfilling or overpressure occurs; and,

Columbia's procedures for discharging LNG into LNG trucks are inadequate in that they fail to include provisions for manually terminating the flow before overfilling occurs. Columbia's O&M, Titled "193.2513, LNG Truck Loading Procedure (9-26-2008)", lacks any requirement for LNG truck-loading personnel to verify the maximum amount of liquid that can be safely loaded into an LNG carrier. The only checks are referred to on pages 5 and 8 where the plant operator is directed to "ask the truck driver at what point on the inches of water gauge the trailer is full", "Verify that there is available capacity to receive the transfer" and "When trailer is full, stop P-105 . . .". This guidance is inadequate without a certified statement of the gage accuracy. Columbia stated the trucks do not have tri-cock valves, nor is there a truck scale at the loading station, both of which are acceptable indicators.

3. §193.2903 Security procedures.

Each operator shall prepare and follow one or more manuals of written procedures to provide security for each LNG plant. The procedures must be available at the plant in accordance with §193.2017 and include at least: . . .

(g) Liaison with local law enforcement officials to keep them informed about current security procedures under this section.

Columbia's procedures for providing security were inadequate in that they failed to provide guidance on establishing a liaison with local law enforcement officials to keep them informed about current security procedures under this section.

Columbia's O&M Sec. 193.2903, Site Specific Security Plan (5-31-2011) sections 7.1.2, 8.5 and 12.0 lack adequate guidance on how they establish liaison with local law enforcement regarding the current security plan.

4. §193.2605 Maintenance procedures.

(a)...

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedure must include:

(1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and . . .

Columbia's maintenance procedures were inadequate in that they did not provide details of the inspections or tests determined under paragraph (a) of this section.

Specifically, the procedures did not provide direction on how to verify that the gas detector monitoring the atmosphere in the vicinity of the refrigerant gases is capable of activating an alarm at not more than 25% LEL of the gas or vapor being monitored.

NFPA 59A 9.1.2 Fire Protection Study (12-9-2005), Sec. 2, Basis of design states:

. . . Flammable gas detection is based on the existing MSA Ultima catalytic units and the proposed new MSA model Ultima X IR units. The units would be calibrated to detect Methane for all locations and alarm at 25% LEL and at 50% LEL. This setting provides for early detection of the heavier hydrocarbons (refrigerants) while continuing to provide monitoring for Methane. . .

1. In a review of Columbia's maintenance procedures, O&M Sec. 193.2602-2, Calibrate – Gas Detector, the PHMSA Inspector noted that the procedure is not specific with respect to the gas or gas combinations which may be present.

2. Columbia's procedure refers to 25% LEL as a critical point, but the procedure fails to note that the LEL for different gases in the refrigerant area is different for each gas.
3. Columbia's procedures must account for these differences when establishing a 25% LEL trigger for the audible and visual alarms for each of these gases.

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

It is requested (not mandated) that Columbia maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Byron Coy, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2014-3001M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,



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

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