

## WARNING LETTER

### OVERNIGHT EXPRESS DELIVERY

May 17, 2018

Randal Broussard  
SVP, US Gas Operations East  
Columbia Gas Transmission, LLC  
201 Energy Parkway, Suite 100  
Lafayette, LA 70508

CPF 1-2018-1014W

Dear Mr. Broussard:

On August 29, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Columbia Gas Transmission, LLC's, a subsidiary of TransCanada Corporation's (TC), Special Permit Docket Number RSPA-80-6W in Charleston, WV.

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

**1. § 192.605 Procedural manual for operations, maintenance, and emergencies.**

- (a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

TC failed to follow, for each pipeline, a manual of written procedures for conducting operations and maintenance activities. Specifically, TC failed to record data as specified in its procedure

70.001.002, *Pipe Inspection, Effective date 6/5/2013* (Pipe Inspection Procedure).

During the inspection, the PHMSA Inspector reviewed a Pipe Inspection and Reporting record, *Work Order B4284760* (Record), conducted on 10/27/2014, and TC's related procedures.

TC's procedure 70.01.01, *External Corrosion Control, Effective date 12/12/2013* (Corrosion Control Procedure), stated in part:

“3.2.3 Examination of a Buried Facility When Exposed

- A. Whenever any buried facility is exposed, the exposed portion must be examined for evidence of external corrosion. This examination must be documented using Procedure 70.001.002 – Pipe Inspection and Reporting”

TC's Pipe Inspection Procedure stated in part:

“2.6 Record Information for Level 1 (Simple) Inspection

...

2.6.3 Record the length of exposed pipe (in feet – e.g., 20.5)

2.6.4 Record the soil condition (1 =“Dry”, 2 =“Moist” or 3 =“Wet” Note: If Maximo is being used to record this inspection, enter the number code corresponding to the applicable category in the work order).

2.6.5 Record the soil type (1 =“Solid Rock”, 2 =“Rocky Soil”, 3 = “Sandy Soil”, 4 =“Topsoil”, 5 =“Gravel”, 6 = “Shale”, 7 = “Sand”, 8 = “Clay”, 9 = “Loam”, or 11 = “Unknown” Note: If Maximo is being used to record this inspection, enter the number code corresponding to the applicable category in the work order).

...

2.6.17 Record whether SCC testing is required based on the below criteria...”

The Record reviewed presented fields without entry for data required by its Procedure: exposed length, soil type, soil condition, and SCC testing required.

Therefore, TC failed to follow, for each pipeline, a manual of written procedures for conducting operations and maintenance activities.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists, up to a maximum of \$2,090,022 for a related series of violations. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a 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, LLC being subject to additional enforcement action.

Please 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).

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1-2018-1014W** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to [robert.burrough@dot.gov](mailto:robert.burrough@dot.gov). Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration