



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

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 1-2018-1015M

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 inspected TransCanada Corporation's (TC) and Columbia Gas Transmission, LLC's, a subsidiary of TC, procedures for Special Permits in Charleston, WV.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Columbia Gas Transmission, LLC's plans or procedures, as described below:

1. **§ 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a) ...
 - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
 - (1) ...
 - (2) **Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.**

TC's procedures for controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of CFR Part 192 were inadequate. Specifically, *70.01.01, External Corrosion Control, Effective date 12/12/2013*, specified record retention requirements for

atmospheric corrosion inspections that conflict with the requirements of § 192.491(c).

TC's procedure 70.01.01, *External Corrosion Control*, Effective date 12/12/2013, states in part:

“5.2 Records Retention

- A. The two most recent Atmospheric Corrosion inspections for onshore facilities will be retained. The five most recent Atmospheric Corrosion inspections for offshore will be retained.”

Per Subpart I, § 192.491(c), records of each test required by that Subpart, which includes atmospheric corrosion inspections, must be retained for at least 5 years. The two most recent atmospheric corrosion inspection records may not provide the last 5 years.

Therefore, TC's procedures for controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of CFR Part 192 was inadequate with regards to atmospheric corrosion inspection records retention.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). 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 Gas Transmission, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1-2018-1015M** 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. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

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,



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

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