

February 28, 2019

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road
Suite 300
West Trenton, NJ 08628

**RE: Algonquin Gas Transmission, L.L.C. Response
Warning Letter
CPF 1-2019-1002W**

Dear Mr. Burrough,

Between May 22nd, 2018 and June 15th 2018 representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS) and inspectors from the Connecticut Department of Energy & Environmental Protection (CT DEEP), acting as agents of PHMSA, performed an integrated inspection of Algonquin Gas Transmission, L.L.C. (AGT), a subsidiary of Enbridge in Massachusetts, Rhode Island, and Connecticut.

On January 31, 2019, PHMSA issued a Warning Letter identifying to two (2) probable violations of Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The following is a summary of the alleged violations and AGT's response.

PHMSA Finding

1. §192.491 Corrosion control records.

(c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §192.465(a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.

AGT failed to maintain a record of each test, survey, or inspection required by Part 192 Subpart I in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition did not exist. Specifically, AGT failed to maintain Pipe and Coating Inspection Report (Report) 1712705900 in sufficient detail of the internal inspection for internal corrosion.

During the inspection, the CT DEEP inspector reviewed Report 1712705900. The Report stated in part:

"Pipe & Coating

Internal Pipe Condition: mt. Surface Not Exposed

Internal Corrosion Product Present: n/a"

"Notes:

Comments: ... A 51.5" length of pipe was replaced on 6-8-2017... This section of pipe will be sent to Houston Metallurgy [sic] no RMTR required."

Report 1712705900 was created on 5/7/2017 to document the temporary repair of a leak. The internal surface was exposed on 6/8/2017 during the removal of the defective weld. Report 1712705900 was not updated, nor was a new report created to include the internal surface inspection for evidence of corrosion when the pipe was removed from the pipeline, as per § 192.475(b).

Therefore, AGT failed to maintain a record of an inspection required by Part 192 Subpart I in sufficient detail to demonstrate adequacy of corrosion control measures or that a corrosive condition did not, exist.

AGT Response

AGT acknowledges that Pipe and Coating Inspection Report No. 1712705900 did not contain sufficient detail of the internal inspection for internal corrosion.

AGT is making revisions to SOP 9-4010, *Defect Assessment and Repair Options for Internal Corrosion*, SOP 9-4020, *Defect Assessment & Repair Options for External Corrosion*, and SOP 9-4040, *Defect Assessment & Repair Options for Dents and Mechanical Damage*, to add clarity regarding documentation of the internal corrosion inspection when a temporary repair has been made. An Advisory is being added to these SOPs that states "If a temporary repair is performed and the excavation site is backfilled, a new PAIR report is required to document the permanent repair."

2. § 192.603 General provisions.

(b) Each operator shall keep records necessary to administer the procedures established under § 192.605.

AGT failed to keep records as required under § 192.603(b) to demonstrate that the Westwood Area Emergency Manual had been reviewed/updated at intervals not exceeding 15 months, but at least once each calendar year, per § 192.605(a).

Section 192.605(a) states in part (emphasis added) "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 one each calendar year.**"

During the inspection, the PHMSA inspector requested to review AGT's records demonstrating compliance with § 192.605(a) for reviewing and updating its Westwood Area Emergency Manual. AGT could only produce one record, dated December 19, 2017, which applied to the review and update for the 2017 calendar year. AGT did not have records showing reviews and updates to the Westwood Area Emergency Manual for 2015 or 2016.

Therefore, AGT failed to keep records as required under § 192.603(b) to demonstrate that the Westwood Area Emergency Manual had been reviewed/updated at intervals not exceeding 15 months, but at least once each calendar year.

AGT Response

AGT acknowledges that AGT did not keep records required under § 192.603(b) to demonstrate that the Westwood Area Emergency Manual had been reviewed/updated at intervals not exceeding 15 months, but at least once each calendar year.

AGT has since made process improvements to ensure Area Emergency Manuals are reviewed and updated at intervals not exceeding the 15 months. Enbridge has implemented a work management process in SAP to generate a work order task that will notify Area Management to review and update their Area Emergency Response Plan prior to the due date.

AGT takes these issues seriously, and will work expeditiously to resolve them. Please call me at (713) 627-6388 if you need additional information.

Sincerely,



Rick Kivela
Manager, Operational Compliance

cc: Karl Baker, CT DEEP (via electronic mail)