

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
Notice of Amendment
CPF 1-2019-1003M**

Dear Mr. Burrough,

From February 25, 2018 and June 15, 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) and the New York State Department of Public Service (NYSDPS) acting as agents of PHMSA, performed an integrated inspection of Algonquin Gas Transmission, L.L.C.'s (AGT), a subsidiary of Enbridge, facilities in Massachusetts, Rhode Island, Connecticut, New York and New Jersey.

On January 31, 2019, PHMSA issued a Notice of Amendment (NOA) identifying to two (2) apparent inadequacies found within AGT's plans and procedures. The following is a summary of PHMSA's concerns and AGT's response to those concerns.

PHMSA Finding

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

AGT's manual of written procedure was inadequate in that it failed to include procedures for controlling corrosion in accordance with the operations and maintenance requirements of Part 192 Subpart I. Specifically, AGT's Procedure Number 2-3010, *Internal Corrosion Monitoring and Mitigation*, dated 03/01/2016 (Corrosion Procedure), failed to provide sufficient detail regarding required timing for completing internal corrosion inspections and their documentation.

Section 192.475(b) states in part "Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion."

During the inspection, the CT DEEP inspector reviewed AGT's Corrosion Procedure. Section 3.0, Visual Inspection Requirements, of the Corrosion Procedure stated in part:

"3.1. Pipeline Cut Open or Removed

Whenever any pipe is cut open or removed from a pipeline, for any reason, a visual inspection must be performed by a Qualified Person to determine whether internal corrosion is present...

...the inspection should include the collection and analysis of solid, liquid and sludge samples, in accordance with SOP #5-3090.

3.2 Documenting Internal Corrosion

The internal conditions of the pipe shall be documented. This includes documenting whether the internal surface is wet or dry and noting the presence or absence of deposits, debris, nodules (discrete deposits), sludge, scale, oil, water, etc. and described in SOP #5-3090.

...

3.6 Recording Information

All inspections shall be recorded within the Pipe Anomaly Database. This information shall be retained for the life of the pipeline."

The Corrosion Procedure required internal inspection of cut or removed pipe as prescribed in § 192.475(b). However, it failed to prescribe a timeframe for how soon the inspection must be completed and documented following the cutting or removal of the pipe. Prompt inspection is needed to be able to obtain the samples and information required by Section 3.0 outlined above. Additionally, AGT's Corrosion Procedure failed to prescribe if the original documentation to initiate repairs is to be updated after internal corrosion inspection is performed, or a new report is to be created for the internal corrosion inspection.

AGT Response

AGT's SOP 2-3010 meets the explicit regulatory requirement and tracks the regulatory language almost verbatim. This finding attempts to imply a specific requirement that is not stated in the regulation. However, AGT is making revisions to SOP 2-3010, *Internal Corrosion Monitoring and Mitigation*, to add clarity regarding the timeframe for how soon the inspection must be completed and documented following the cutting or removal pipe. The following language is being added to SOP 2-3010, Section 3.1, to address this issue:

- “The visual inspection includes inspecting each end of the pipe that is remaining in service plus both ends of the replaced section of pipe. This visual inspection must be completed prior to the replacement pipe being installed.”
- “The collection of samples should be performed as soon as practicable after the pipe is removed. Taking into consideration the safety aspects associated with any excavation with the realization that the composition of the sample material can change the longer it is exposed to the atmosphere.”

Enclosed is a redlined copy of SOP 2-3010 showing the proposed revisions.

AGT will also make revisions to 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 (i.e., if the original documentation for the temporary repair is to be updated after internal corrosion inspection is performed, or a new report is to be created for the internal corrosion inspection). Advisory language is being added to SOP 9-4040 to address this issue:

- “If a temporary repair is performed and the excavation site is backfilled, a new PAIR report is required to document the permanent repair.”

Enclosed is a redlined copy of SOP 9-4040 showing the proposed revision. See Advisory on page 22. AGT will make similar revisions to SOP 9-4010, *Defect Assessment and Repair Options for Internal Corrosion*, and SOP 9-4020, *Defect Assessment & Repair Options for External Corrosion*.

2. § 192.805 Qualification Program

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) Identify covered tasks;

AGT's written qualification program was inadequate. Specifically, AGT's Operator Qualification Procedures, dated December 7, 2017 (OQ Plan) failed to include adequate provisions for identifying covered tasks based on the four-part test defined in § 192.801(b).

During the inspection, the PHMSA inspector reviewed AGT's OQ Plan. The inspector found that the OQ Plan failed to include a written process for identifying covered tasks using the four-part test set out in § 192.801(b). The OQ Plan included the origin of AGT's Covered Task List, which included who participated in determining the Covered Task List; however, the provisions to identify the covered tasks based on the four-part test as defined in § 192.801(b) were not included in the OQ plan.

Therefore, AGT failed to include provisions in their written qualifications program to identify covered tasks in accordance with § 192.805, by not including the four-part test set out in § 192.801(b).

AGT Response

AGT acknowledges that its OQ plan did not explicitly include a written process for identifying covered tasks using the four-part test set out in § 192.801(b).

AGT is revising its OQ plan to include the four-part test in accordance with § 192.801(b). Enclosed is a draft copy of the revised OQ plan. The proposed revision to include the four-part test is located in Section 5.2.

We trust that you will find the revisions to the OQ Plan and SOPs 2-3010, 9-4010, 9-4020 and 9-4040 will fully address the issues noted in the NOA, and you will consider this matter closed. Upon PHMSA's acceptance of the proposed amended procedures and OQ plan as being adequate to address the issues noted in the NOA, AGT will issue the revised SOPs, effectively communicate the revisions, and train affected personnel as needed.

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 w/Encl. (via electronic mail)
Kevin Speicher, NYSDPS w/Encl. (via electronic mail)