

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

January 17, 2019

Stan Chapman
Senior Vice President and General Manager
Columbia Gas Transmission, LLC
700 Louisiana Street
Houston, TX 77002

CPF 1-2019-1005M

Dear Mr. Chapman:

From January 29, 2018 to September 14, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Columbia Gas Transmission's (CGT) procedures for control room management in Charleston, West Virginia.

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

1. §192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section, except that for each control room where an operator's activities are limited to either or both of:

CGT's written control room management procedures were inadequate. Specifically, CGT's Control Room Management Plan, dated 5/21/2018 (CRM Plan) did not require review and approval of deviations from control room management procedures prior to, or during, the time when the deviations could impact safe operation of the pipeline system, in accordance with § 192.631(d)(4).

Section 192.631(d)(4) states:

(d) Fatigue mitigation. Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:

...

(4) Establish a maximum limit on controller hours-of-service, which may provide for an emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility.

During the inspection, the inspection team reviewed CGT's CRM Plan and records of deviations from hours of service requirements. The records indicated that CGT failed to contemporaneously complete documentation to demonstrate that deviations from the hours of service requirements noted in the CRM Plan were necessary for the safe operation of the pipeline system. The CRM Plan, Section 1.9, specified that "Deviations from the requirement of this plan are permitted only if necessary for the safe operation of the pipeline facility(s). Any deviations from this CRM Plan must be approved by the Director, Gas Control or his/her designee. Any deviations must be recorded and must contain justification of why the deviation was necessary for the safe operation of a pipeline. Hours of Service (HOS) deviations will be prepared/submitted by the designated Fatigue Risk Manager."

The plan further specified in Section 2 that "Should work limitations need to be exceeded due to emergencies or unscheduled absences, the Director of Gas Control or designee must approve Hours of Service (HOS) deviation forms submitted by the Fatigue Risk Manager."

The form that CGT was using to document Hours of Service deviations did not note a manager's contemporaneous approval. The form had a space for the Director of Gas Control to sign for what looks like approval in advance, but during the headquarters review the CGT control room management team confirmed that the form typically documents a post-event review only. The review or acknowledgement may take place long after the deviation has occurred, and the impacts on the safe operation of the system have passed.

The inspection team noted the following historical occurrences of hours of service deviations where management approval was documented:

- 2018 - 3 occurrences
- 2017 - 7 occurrences
- 2016 - 3 occurrences
- 2015 - 18 occurrences
- 2014 - 3 occurrences

Of these 34 instances noted above, 20 were reviewed and approved after the occurrence of the hours-of-service deviation.

Therefore, CGT's control room management procedures were inadequate regarding review and approval of deviations.

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 60 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 Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2019-1005M** 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*