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October 23, 2019

Mr. Robert Burrough, Director  
PHMSA Eastern Region  
840 Bear Tavern Road  
Suite 300  
West Trenton, NJ 08628

**Re: Response to CPF 1-2019-1018M**

Dear Mr. Burrough:

USDI, on behalf of PGPipeline, acknowledges receipt of your letter dated September 26, 2019. USDI and PGPipeline agree with the findings in Inspection CPF 1-2019-1018M, and have made the following revisions to correct the inadequacies identified.

1. 192.243 Nondestructive Testing – Section 14, page 57 of the OME has been updated to state all welds will require non-destructive testing. Appendix A-1 and A-2 has been referred to that includes NDT procedures.
2. 192.605 Start up and Shut Down – Section 4.2 includes a detailed Pipeline Start-up and Shut Down Procedure with valve and purging locations listed. 4.4.2.4 was modified to state precautions should pressure or flow rate become outside of normal operating limits.
3. 192.615 Emergency Plan – Sections 9.4, 9.5 and 9.6 were updated to include procedures in response to an over-pressure situation.
4. 192.615 Emergency Plan – Sections 9.4, 9.5 and 9.6 were updated to include direction of a planned response and to whom the notifications get transferred.
5. 192.805 Qualification Plan – A new Operator Qualification plan was written that designated PHMSA to be notified under any provisions or modifications.
6. 192.909 Integrity Management plan – The current integrity management plan was updated to include direction to notify PHMSA of significant modifications in

Section 13. In addition, the plan will be updated completely with modifications addressing the modified ECDA plan and other detailed procedures. When this is complete, PHMSA will be notified.

7. 192.925 External Corrosion Direct Assessment – A new ECDA plan was created that goes into further detail in all aspects of ECDA and is specific to PGPipeline.
8. 192.935 Preventive and Mitigative Measures – Section 6.3 was modified to include the frequency of surveying Class 3 and Class 4 locations to be conducted semi-annually. The entirety of the pipeline was surveyed on September 10, 2019 and the Class 3 location was again surveyed on October 8, 2019. Moving forward the Class 3 location will be surveyed once in the spring and once in the fall.

The noted changes have been posted to USDI/PGPipeline “Sharefile” cloud-based storage system. These sections and documents will be sent via email and hard copies mailed to the PHMSA Eastern Region office.

We trust that these revisions meet with your approval. If after reviewing this you have any questions or concerns, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Taylor Browne".

Taylor Browne, USDI

Pc: Mr. Steve Newell, PGPipeline