

Dominion Energy Transmission, Inc.  
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DominionEnergy.com

**CERTIFIED MAIL**

December 30, 2019

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

**RE: CPF 1-2019-1021W Warning Letter**

Dear Mr. Burrough,

This letter is a formal response by Dominion Energy Transmission, Inc. (DETI) to the following alleged probable violation contained in Warning Letter CPF 1-2019-1021W, dated October 28, 2019.

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

**(a) 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 a least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Dominion failed to review and update its manual of written procedures for emergencies at intervals not exceeding 15 months, but at least once each calendar year. Specifically, Dominion failed to review and update its emergency procedures contained in its Dominion Transmission, Inc. Emergency Plan, revised 3/28/2016 (Combined Emergency Plan) during calendar years 2017 and 2018.

During the inspection, the PHMSA inspector reviewed the Combined Emergency Plan. Dominion confirmed during the inspection that the last review and update of this emergency procedure was completed on March 28, 2016. Dominion stated that they review and update

their Combined Emergency Plan only as needed. Their Site-Specific Emergency Plans are reviewed/updated at intervals not exceeding 15 months, but at least once each calendar year.

Dominion stated in the Combined Emergency Plan that the document includes written procedures for minimizing hazards resulting from natural gas and liquid pipeline emergencies. The Combined Emergency Plan (in conjunction with Dominion's Site-Specific Emergency Plans) meets the description in § 192.615 Emergency Plans of written procedures to minimize the hazard resulting from a gas pipeline emergency. In accordance with § 192.605(e), these procedures must be included in the manual required by § 192.605(a), and thus are subject to the same review and updating requirements therein.

Therefore, Dominion failed to meet the requirements of § 192.605(a) by not reviewing and updating their Combined Emergency Plan at intervals not exceeding 15 months, but at least once each calendar year during calendar years 2017 and 2018.

**DETI Response:**

DETI's Standard Operating Procedure (SOP) 010/03 *Maintenance of Manuals and Plans* addresses the requirement to review and revise its SOPs and Emergency Plan per the requirements of 49 CFR Part 192.605, each calendar year, at intervals not exceeding 15 months. Attached within the SOP is a Job Aid that defines the review procedure for the SOP review team. The review procedure states to "review all of the following databases that pertain to Standard Operating Procedures: Work Procedures, Terms/Definitions, Forms, Charts/Graphs/Drawings, and any links that may be found within the SOP document." The Combined Emergency Plan is a link within SOP 010/03. To improve the SOPs and review process, DETI has revised SOP 010/03 to include the following requirement (shown below).

*SOP 010/03 Maintenance of Manuals and Plans*

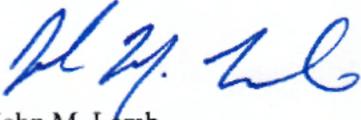
III. MAINTENANCE:

- A. *The SOPs and Emergency Plan, required by Department of Transportation (DOT) 49 CFR, Part 192.605, shall be reviewed and revised as necessary each calendar year, at intervals not exceeding 15 months. The Environmental Manual, Employee Safety Manual, Drug & Alcohol Misuse Prevention Plan, Corrosion Manual and Pipeline Repair Manual should be reviewed and revised as necessary.*  
*The Combined Emergency Plan shall note the revision date and review date within the electronically version of the plan. These dates will be documented as there may be calendar years in which no revisions to the Combined Emergency Plan are required. A hardcopy of the current revision of the Combined Emergency Plan shall be posted at appropriate operating locations.*

To improve documentation of the review process, DETI will record the last revised date and reviewed date within the electronic version of the Combined Emergency Plan to document this annual, not to exceed 15 month, review requirement. DETI completed a review of the Combined Emergency Plan in 2019, outside of the SOP review process, due to recent organizational changes and documented its review and revision on November 13, 2019.

If you have any questions or concerns, or should require additional information, please do not hesitate to contact Dan Stahl at (681) 842-3365.

Respectfully,



John M. Lamb  
Vice President, Eastern Pipeline Operations  
Dominion Energy Transmission, Inc.