

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

April 7, 2020

Matt Lamb
Vice President, Eastern Pipeline Operations
Dominion Energy Transmission, Inc.
925 White Oaks Boulevard
Bridgeport, WV 26330

CPF 1-2020-5006W

Dear Mr. Lamb:

From July 16-18, 2019, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Dominion Energy Transmission, Inc.'s (Dominion) propane pipeline system in Pennsylvania and West Virginia.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

1. **§ 195.420 Valve Maintenance**
 - (a) **Each operator shall maintain each valve that is necessary for the safe operation of its pipeline systems in good working order at all times.**

Dominion failed to maintain a valve that is necessary for safe operation of its pipeline systems in good working order at all times. Specifically, a vapor leak was evident at Dominion's Lower Run Gate Valve (GA-20) at the time of the inspection and was identified as having been present for approximately one month prior.

During the field inspection on July 16, 2019, the PHMSA inspectors observed a vapor leak at GA-20 on the isolation valve between the launcher/receiver trap and the main line. When Dominion was questioned about the vapor leak, the response was that there had been an on-going problem

with leakage since the valve was installed and pressurized approximately one month prior. Dominion then stated that the line was scheduled for blow down within a week, and the repair or replacement would be attempted at that time. This demonstrates that Dominion was aware of the condition of the valve but neither disclosed it to PHMSA nor took steps to immediately mitigate the leak.

Therefore, Dominion failed to maintain its isolation valve at GA-20 in safe working order at all times, as required by § 195.420(a).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Dominion Energy Transmission, Inc. being subject to additional enforcement action.

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).

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2020-5006W** 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 USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration