



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

WARNING LETTER

VIA ELECTRONIC MAIL TO: stanley_chapman_iii@tcenergy.com

August 3, 2022

Mr. Stanley Chapman III
Executive Vice-President and President, U.S. and Mexico Natural Gas Pipelines
Columbia Gas Transmission, LLC
700 Louisiana Street
Houston, Texas 77002

CPF 1-2022-064-WL

Dear Mr. Chapman:

From October 25, 2021 to March 1, 2022, representatives from the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Columbia Gas Transmission, LLC's (Columbia) pipeline facilities located in: Bedford, Fayette, Greene and Summerset counties in Pennsylvania; Mineral, Monongalia and Preston Counties in West Virginia; and Allegany, Garret, Montgomery, Howard, Baltimore, Hartford and Cecil Counties in Maryland.

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

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 at 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.

Columbia failed to follow its manual of written procedures. Specifically, Columbia failed to follow its *Control and Monitoring Systems, Tests, and Inspections at Gas Facilities*, dated 11/01/18 (C&M Procedure), Section 4 ‘Work Instruction’, regarding documenting over pressure protection device inspections as required by § 192.605(a).

Columbia’s C&M Procedure contained procedures for inspecting both static pressure transmitters (Transmitters) and signal to pressure I/P transducers (Transducers). Section 4.1 of this procedure included steps for verifying operating point ‘As Found’ pressure and documenting this reading on the inspection records for Transmitters. Section 4.6 included steps for verifying 3-point up range and operating point ‘As Found’ and ‘As Left’ measurements and documenting these readings on the inspection records for Transducers.

During the inspection, PHMSA requested records for the testing and inspection of overpressure protection devices located at Bruceton Mills Compressor Station and Salisbury Compressor Station for calendar years of 2017-2020. Columbia provided Bruceton Mills CS records “10994398 Transducer, Pressure -- TP364-1” and “10994416 Transducer, Pressure -- TP364-2”, and Salisbury CS records “10994536 Transducer, Pressure -- TP364-1P” and “10994557 Transducer, Pressure -- TP364-2P”.

Based on PHMSA’s review of those records, Columbia failed to follow its C&M Procedure regarding documenting the operating point ‘As Found’ and other required measurements of these devices at the time of the inspections. Records for (4) pressure transducers identified as Bruceton Mills CS device tags TP364-1 and TP364-2, and Salisbury CS device tags TP364-1P and TP364-2P, were reviewed for calendar years 2017 - 2020 and were found to lack this information. There were no data readings in the 2017 and 2018 inspection years. Further, work order fields for subsequent records directed the technician to input measurement point data pursuant to Sections 4.1.1.10 and 4.1.1.11 of the C&M Procedure which applies to Transmitters, despite these devices being documented as Transducers. The 2019 and 2020 records documented “0 PSIG” as the value for the operating point ‘As Found’ reading, which may not be valid operating point(s) on a pressurized system. It is unclear from these records as to the type of devices being inspected (Transmitters or Transducers), however, they were presented to the inspector to be over pressure protection pressure Transducer devices. None of the records provided documented a 3-point up range or ‘As Left’ values pursuant to Section 4.6 of the procedures. Overall, the records were unclear as to what inspection procedure was followed, and unclear as to what the operating point ‘As Found’ pressure being recorded was.

Therefore, Columbia failed to follow the applicable portions of its C&M Procedure regarding documenting its inspections of these devices, as required by § 192.605(a).

2. § 192.709 Transmission lines: Record keeping.

Each operator shall maintain the following records for transmission lines for the periods specified:

(a) ...

(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or

until the next patrol, survey, inspection, or test is completed, whichever is longer.

Columbia failed to maintain records demonstrating leakage surveys were performed using leak detector equipment on its MB transmission line (Potomac River to Rockville, MD) during 2019 pursuant to § 192.706(a).

Section 192.706(a) states:

Leakage surveys of a transmission line must be conducted at intervals not exceeding 15 months, but at least once each calendar year. However, in the case of a transmission line which transports gas in conformity with §192.625 without an odor or odorant, leakage surveys using leak detector equipment must be conducted—

- (a) In Class 3 locations, at intervals not exceeding 7 ½ months, but at least twice each calendar year; and

During the inspection, PHMSA requested Columbia's 2018 to 2020 records related to instrumented leakage surveys for the MB transmission line in a no-fly zone located between the Potomac River and Rockville, MD. This portion of the MB transmission line is a class 3 location without odorant and is in a designated no fly zone that stretches for approximately 9 miles. Columbia failed to provide records demonstrating that instrumented leak surveys were performed for the MB pipeline during calendar year 2019.

Therefore, Columbia failed to maintain 2019 records of leakage surveys utilizing leak detector equipment pursuant to § 192.706(a) for portions of its MB transmission line, as required by § 192.709(c).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not 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.

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 items identified in this letter. Failure to do so will result in Columbia Gas Transmission, LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2022-064-WL**. 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).

Sincerely,

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

Cc: Daniel Cerkoney <dan_cerkoney@tcenergy.com>
Amy Willis <amy_willis@tcenergy.com>