

## **NOTICE OF AMENDMENT**

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 17, 2018

Mr. Ron Jorgensen  
Vice President, Operations and Gas Control  
Dominion Energy Questar Pipeline  
333 South State Street  
P.O. Box 45360  
Salt Lake City, UT 84145-0360

**CPF 5-2018-1007M**

Dear Mr. Jorgensen:

On March 12, 2018, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) and Arizona Corporation Commission, pursuant to Chapter 601 of 49 United States Code, inspected Dominion Energy Questar Pipeline's (DEQP) procedures for operation and maintenance in Salt Lake City, Utah.

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

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
  - (a) . . .
  - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
    - (1) **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.**

DEQP's O&M did not have adequate procedures for operating, maintaining, and repairing the pipeline in accordance with §192.736(c).<sup>1</sup> Specifically, DEQP did not have procedures for maintaining each gas detection and alarm system required by Section 192.736 to ensure they were functioning properly. At the time of inspection, DEQP did not have detailed procedures for gas detector and flame detector equipment maintenance (including inspection and calibration) to ensure they were functioning properly.

2. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
  - (a) . . .
  - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
    - (2) **Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.**

DEQP's O&M did not have adequate procedures for corrosion control in accordance with §192.479.<sup>2</sup> Although DEQP has procedures for atmospheric corrosion control in Section 18.1 of SP 7-00-01, that procedure states that "[e]ach aboveground pipeline or portion of a pipeline installed after July 31, 1971 that is exposed to the atmosphere will be cleaned and either coated or jacketed with a material suitable for the prevention of atmospheric corrosion." The conditional statement, "installed after July 31, 1971" should be removed or otherwise revised to clarify that this regulation applies to each pipeline or portion of pipeline that is exposed to the atmosphere, unless it falls under the exceptions listed in paragraph (c). In addition, the procedures do not give personnel adequate guidance on how to evaluate the condition of no coating or inadequate coating at air-soil interface locations.

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<sup>1</sup> 49 C.F.R. § 192.736(c) requires that "[e]ach gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests."

<sup>2</sup> 49 C.F.R. §192.479 Atmospheric corrosion control: General.

- (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.
- (b) Coating material must be suitable for the prevention of atmospheric corrosion.
- (c) Except portions of pipelines in offshore splash zones or soil-to-air interfaces, the operator need not protect from atmospheric corrosion any pipeline for which the operator demonstrates by test, investigation, or experience appropriate to the environment of the pipeline that corrosion will -
  - (1) Only be a light surface oxide; or

3. §192.605 Procedural manual for operations, maintenance, and emergencies.
- (a) . . .
  - (c) ***Abnormal operation.*** For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:
    - (4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

DEQP's O&M did not have adequate procedures for abnormal operations with regard to periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operations and taking corrective action where deficiencies are found. Although DEQP has procedures for atmospheric corrosion control, Section 7.1.5 of its procedures states DEQP "shall review" abnormal event procedures, but does not specify when or how long they have to accomplish review of abnormal event procedures. Since the regulation requires periodic review, DEQP's written procedures must specify how often these reviews must take place.

4. §192.605 Procedural manual for operations, maintenance, and emergencies.
- (a) . . .
  - (b) ***Maintenance and normal operations.*** The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
    - (8) Periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.

DEQP's O&M did not have adequate procedures for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found. Although DEQP has procedures for periodic review of operation and maintenance procedures in SP 3-90-01, Annual Review of Procedures Manual and Periodic Review of Work Done by Company Personnel: Section 7, Periodic Review of Work Done by Company Personnel, it does not specify when or how long they have to accomplish review of their maintenance and normal operating procedures to determine adequacy and effectiveness. Although DEQP informed PHMSA that periodic means 3 years, not-to-exceed 39 months, during the inspection, their procedures do not reflect this. Since the regulation requires periodic review, DEQP's written procedures must specify how often these reviews must take place.

5. §192.614 Damage prevention program.
- (a) . . .
  - (c) **The damage prevention program required by paragraph (a) of this section must, at a minimum:**

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(2) Not affect the safe operation of the pipeline before the next scheduled inspection.

**(1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.**

DEQP's written program to prevent damage to its pipeline from excavation activities is deficient because it fails to sufficiently identify the persons normally engaged in excavation activities in the area in which the pipeline is located. Although DEQP has procedures for identifying persons who normally engage in excavation activities in Standard Practice 5-00-07, Sect 7., it does not currently have a procedure (or ability) to identify excavators from one-call not included on their excavator/contractors list. And the procedure did not specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system.

In addition to the alleged inadequacies cited above, PHMSA would also like to recommend that DEQP define the terms "management" and "for cause" in its procedures for anomalies discovered in non-HCA areas. Specifically, Standard Practices (SP) 5-01-00, Section 6, the procedure for Anomaly Response Scheduling for Non-covered Segments, indicates that "[i]f the anomaly is in a Class 1 Location, non-HCA, and outside any Consequence Areas, the responsible time requirement may be lengthened with management approval (for cause)." This is not an alleged violation.

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 30 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 DEQP maintain documentation of the safety improvement

costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Kim West, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2018-1007M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Kim West  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

cc: PHP-60 Compliance Registry  
PHP-500 C. Allen (#157195)