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CERTIFIED MAIL

August 9, 2012

Mr. Byron Coy, Jr.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Mountain View Office Park
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: Notice of Amendment CPF 1-2012-1017M

Dear Mr. Coy,

This letter is the formal response by Dominion Transmission, Inc. (DTI) to the Notice of Amendment (NOA) dated July 13, 2012, which identified a procedural deficiency regarding the Emergency Shutdown system at Perulack Compressor Station. Specifically;

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 one 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.
   (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.

Dominion's SOP, *Section 060 SOP 22 Safety Shutdown Systems & Component- Gas Turbines & Centrifugal Units*, in its operational maintenance manual was inadequate because it failed to include a process to ensure that the Emergency Shut-down (ESD) system would function as designed. Dominion Transmission, Inc. Fire/gas system design document item 3.1.2 for the fire protection and shut down states:

1. High levels on any two CGI detectors will ESD the facility
2. Fires on any two UV/IR detectors will ESD the facility.

At the time of the inspection Dominion, stated that the detectors were tested individually and that testing two devices simultaneously was not necessary.

Dominion's *Section 060 SOP 22 Safety Shutdown Systems & Component- Gas Turbines & Centrifugal Units*, should be amended to include a process to validate that detection on "any two" CGI's or "any two" UV/IR's would activate the Emergency Shut-down (ESD) system.

DTI Response:

During PHMSA's visit to Perulack Station, the inspectors stated that DTI must annually test each scenario that may trigger the emergency shutdown (ESD) of the station. DTI explained that testing each and every combination of device triggers would be overly burdensome, and impractical.

To expand on this reasoning, further explanation of DTI's ESD system philosophy is needed. Typically (with the exception of some site-specific variations), the combination of detections by devices within each compressor station will trigger the ESD of the station. Specifically, concurrent signals from two independent CGI (gas detection) or UVIR (flame detection) devices will initiate the ESD. DTI annually tests each device (CGI, UVIR, Shutdown Switches, etc.) to ensure proper functionality, and that each properly communicates with the ESD System as designed. This functionality is implemented throughout DTI's pipeline system.

§192.167 (*Compressor Stations: Emergency Shutdowns*) does not require that fixed gas detection, flame detection, or any other such safety device trigger a compressor station ESD (for onshore facilities). More specifically, §192.167(a)(4) states:

> **"(4) It must be operable from at least two locations, each of which is:**
> **(i) Outside the gas area of the station;**
> **(ii) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced;**
> **(iii) Not more than 500 feet (153 meters) from the limits of the station"**

Furthermore, under §192.736 (Compressor stations: Gas detection) each gas detection system is only required to warn persons about to enter the building and persons inside the building of a possible concentration of gas in air of not more than 25 percent of the lower explosive limit. There is no requirement to shutdown an engine (or the compressor station) or to evacuate gas from the associated piping.

The enhanced functionality that DTI has implemented at its compressor stations goes well above and beyond the requirements noted within §192.167 and §192.736. However, the additional

inspection requirements detailed in this Notice would make it difficult to implement. For example, at a small facility such as Perulack, there are 21 separate combinations of device signals that could initiate an ESD. At many of DTI's larger facilities, that number of possible combinations climbs exponentially, in excess of 2,000. The addition of literally tens of thousands of annual inspections across DTI's system would make the implementation of this enhanced ESD functionality impractical, and overly burdensome.

DTI wishes to continue this "best practice," which provides a higher level of safety than the minimum requirements prescribed by the CFR. Implementation of the requirements of this Notice would make that difficult, if not impossible. Please advise if DTI's existing SOP which requires documenting the annual test of each emergency device is sufficient and meets the intent of this NOA.

If you have any questions, or should require additional information, please do not hesitate to contact Shawn Miller at (304) 627-3404.

Respectfully,

Jeffrey L. Barger
Vice President, Pipeline Operations
Dominion Transmission, Inc.