



U.S. Department
Of Transportation
**Pipeline and
Hazardous Materials
Safety Administration**

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.989.2171

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

August 31, 2015

Ken Oostman
VP Engineering
Columbia Gas Transmission, LLC
5151 San Felipe, No. 2500
Houston, TX 77056

CPF 1-2015-1020M

Dear Mr. Oostman:

From December 8 through December 12, 2014, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code inspected the Columbia Gas Transmission, LLC (CGT) Liquefied Natural Gas (LNG) Operations and Maintenance procedures in Chesapeake, Virginia.

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

1. §193.2017 Plans and procedures.

(a) Each operator shall maintain at each LNG plant the plans and procedures required for that plant by this part. The plans and procedures must be available upon request for review and inspection by the Administrator or any State Agency that has submitted a current certification or agreement with respect to the plant under the pipeline safety laws (49 U.S.C. 60101 et seq.). In addition, each change to the plans or procedures must be available at the LNG plant for review and inspection within 20 days after the change is made.

CGT's written plan, 220.05.01 "DOT Incidents – Reporting and Investigating Requirements" effective 10/3/2014, is inadequate in that it fails provide guidance for reporting LNG facility incidents in accordance with §193.2011.

§193.2011 states that "Incidents, safety-related conditions, and annual pipeline summary data for LNG plants or facilities must be reported in accordance with the requirements of Part 191 of this subchapter."

§191.15 "Transmission systems, gathering systems, and liquefied natural gas facilities. Incident report" paragraph (b) states in part that "LNG. Each operator of a liquefied natural gas plant or facility must submit DOT Form PHMSA F 7100.3 as soon as practicable . . ."

Section 3.2, Incident Report, of CGT's written plan states in part that: "An electronic DOT PHMSA Form RSPA F 7100.2 shall be submitted by System Integrity as soon as practical, but not more than 30 days after an Incident. Such reports are not required for LNG facilities. . . The Incident report e-form must be submitted electronically to DOT through the Pipeline and Hazardous Materials Safety Administration (PHMSA) OPS Online Data Entry and Operator Registration System."

The procedure does not provide guidance related to the use of DOT Form PHMSA F 7100.3.

2. § 193.2513 Transfer procedures.

(a) Each transfer of LNG or other hazardous fluid must be conducted in accordance with one or more manuals of written procedures to provide for safe transfers.

CGT's LNG Truck Loading Procedure – SOP 1 Procedure No. 310.008.450, effective 4/11/2014, is inadequate in that it fails to require documentation of the date the truck loading was performed, and the person that performed the truck loading.

Section 2.3 Records states: "Utilize the "Truck Loading Checklist" in Exhibit 1 during LNG truck loading operations. The Company's work management system is used to record truck loading operations. A scan of "Truck Loading Checklist" should be attached to the Maximo work order. Paper copies should be stored at the LNG Plant. Records should be maintained for five (5) years plus the current year."

There is no requirement for dating or signing the checklist.

3. §193.2503 Operating procedures.

Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for:

(d) Purging and inerting components according to the requirements of §193.2517.

CGT's written purging procedures, Procedure 310 – Purge LNG Pumps, dated 10/1/2014, and Procedure SPP-Rev 0 – Purge Adsorber D-101 C, issued 6/15/2009, are inadequate in that they fail to provide details on how to document the steps taken when purging LNG pumps and / or adsorbers, such as the form that should be used, the date the purging was performed, the name of the person that performed the purging, and where the completed form should be filed.

4. §193.2605 Maintenance procedures.

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedure must include:

(1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and

CGT's written procedure, 310.26.01 – Support Systems, effective date 11/21/2014, is inadequate in that it fails to include the details of the inspections or tests determined under paragraph (a) of section 193.2605.

193.2605 states that: "Each operator shall determine and perform, consistent with generally accepted engineering practice, the periodic inspections or tests needed to meet the applicable requirements of this subpart and to verify that components meet the maintenance standards prescribed by this subpart."

§193.2609 states that: "Each support system or foundation of each component must be inspected for any detrimental change that could impair support."

CGT procedure 310.26.01 paragraphs 3.1 and 3.2 state that this inspection must be conducted once each year, not to exceed 18 months. The procedure lacks criteria for evaluating the inspection findings and determining if or when remediation of the support system is required.

5. §193.2605 Maintenance procedures.

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedure must include:

(1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and

CGT's procedure, 310.001.025 – Refrigerant Hose Maintenance, effective date 12/01/2013, is inadequate in that it references the 2009 edition of NFPA 59A instead of the 2001 edition that is currently incorporated by reference under §193.2013.

Specifically, paragraph 2.3.2.4, states that: “Pressure test each refrigerant hose to a pressure of 300 psig on the propane/ iso-butane/ iso-pentane loading station and a pressure of 1000 psig on the ethylene loading station (This is the set pressure of the relief valve and per *NFPA59A Section 11.8.6 - 2009 version* [emphasis added] that is the required test pressure).”

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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). 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 a Final Order.

If, after opportunity for a hearing, 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. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within **60** 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 Dominion maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to, as well as any correspondence relating to this Notice to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 1-2015-1020M** on each document you submit, and please provide a (signed) copy in electronic format whenever possible. Smaller files may be emailed to Byron.Coy@dot.gov. Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Sincerely,

Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

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