U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

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

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

December 29, 2020

Stanley Chapman
Senior Vice President & General Manager
Columbia Gas Transmission, LLC
700 Louisiana Street
Houston, Texas 77003

CPF 1-2020-015-NOA

Dear Mr. Chapman:

On April 20-24, 2020, a representative of 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 Gas) procedures[1] in Charleston, WV.

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

1. § 192.303 Compliance with specifications or standards.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Columbia Gas' comprehensive written specifications or standards that are consistent with Part 192 were inadequate. Specifically, Columbia Gas' *Engineering Specification, TES-CT-GEN-G Pipeline Construction Specification (US-Mex)*, *dated 2020-Jan-02,* (Specification) failed to include sufficient details regarding repairing steel pipe in accordance with § 192.309(a)[2].

[1] Columbia Gas was acquired by TC Energy and uses TC Energy procedures to comply with the pipeline safety regulations.
[2] § 192.309 Repair of steel pipe.
(a) Each imperfection or damage that impairs the serviceability of a length of pipeline of steel pipe must be repaired or removed. If a repair is made by grinding, the remaining wall thickness must a least be equal to either:
(1) The minimum thickness required by the tolerances in the specification to which the pipe was manufactured; or
(2) the design pressure of the pipeline.

During the inspection, the PHMSA inspector reviewed Columbia Gas' Specification. The Specification, under section 2.7 "Inspection and Repair of Company Assets (pipe, equipment, or appurtenances)", sub-section 2.7.7 was inadequate as it did not include procedures addressing the requirements of § 192.309(a).

Therefore, Columbia Gas failed to include procedures in its construction specifications addressing the requirements of § 192.309(a), as required by § 192.303. Columbia Gas must amend its specifications to include details of the criteria required by § 192.309(a).

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.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

Columbia Gas' procedures for operating its pipelines in accordance with each of the requirements of 49 CFR Part 192 Subpart L were inadequate. Specifically, Columbia Gas' *Operations and Maintenance (O&M) Manual, U.S. Natural Gas Pipelines and Underground Natural Gas Storage Facilities*, dated 12/20/2019 (Procedures) failed to include procedures addressing the requirements of § 192.620(c)(1)-(3)[3] under Alternative Maximum Allowable Operating Pressure (AMAOP).

Columbia Gas' Procedure failed to include the requirements under § 192.620(c)(1)-(3) entitled: "*What is an operator electing to use the alternative maximum allowable operating pressure required to do?"* Columbia Gas indicated that the pipeline operating under § 192.620 had already satisfied that section of the code and they believe that this portion of the code is not required to be included in their procedures.

[3] § 192.620 Alternative maximum allowable operating pressure for certain steel pipelines.
(a) …
(c) What is an operator electing to use the alternative maximum allowable operating pressure required to do? If an operator elects to use the alternative maximum allowable operating pressure calculated under paragraph (a) of this section for a pipeline segment, the operator must do each of the following:
(1) For pipelines already in service, notify the PHMSA pipeline safety regional office where the pipeline is in service of the intention to use the alternative pressure at least 180 days before operating at the alternative MAOP. For new pipelines, notify the PHMSA pipeline safety regional office of planned alternative MAOP design and operation at least 60 days prior to the earliest start date of either pipe manufacturing or construction activities. An operator must also notify the state pipeline safety authority when the pipeline is located in a state where PHMSA has an interstate agent agreement or where an intrastate pipeline is regulated by that state.
(2) Certify, by signature of a senior executive officer of the company, as follows:
(i) The pipeline segment meets the conditions described in paragraph (b) of this section; and
(ii) The operating and maintenance procedures include the additional operating and maintenance requirements of paragraph (d) of this section; and
(iii) The review and any needed program upgrade of the damage prevention program required by paragraph (d)(4)(v) of this section has been completed.
(3) Send a copy of the certification required by paragraph (c)(2) of this section to each PHMSA pipeline safety regional office where the pipeline is in service 30 days prior to operating at the alternative MAOP. An operator must also send a copy to a State pipeline safety authority when the pipeline is located in a State where PHMSA has an interstate agent agreement, or an intrastate pipeline is regulated by that State.

During the inspection, Columbia Gas informed PHMSA that this operator temporarily de-rated their line operating under the AMAOP. However, they do plan to convert back to their original § 192.620 AMAOP status. When converting back to the AMAOP, the operator must follow all the applicable code requirements, including § 192.620(c)(1-3).

Therefore, Columbia Gas' Procedure was inadequate as it does not include procedures addressing the requirements of § 192.620(c)(1-3). Columbia Gas must revise its O&M to address this deficiency or state in the O&M AMAOP will not be utilized unless such revisions are made.

3. § 192.805 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

…

(g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed;

Columbia Gas' written qualification program was inadequate. Specifically, Columbia Gas' *Operator Qualification Program, dated 12/20/2019,* (OQ Program) failed to include procedures addressing the requirements of requalification intervals in accordance with § 192.805(g).

During the inspection, the PHMSA inspector reviewed Columbia Gas' OQ Program. The OQ Program, under section 6.1.2 "Subsequent Qualification", did not provide adequate provisions to identify the intervals at which evaluation of the individual's qualifications is needed.

Therefore, Columbia Gas failed to include procedures addressing the requirements of§ 192.805(g). Columbia Gas must amend its procedures to include details of the criteria required by § 192.805(g).

4. § 192.907 What must an operator do to implement this subpart?

(a) *General.* No later than December 17, 2004, an operator of a covered pipeline segment must develop and follow a written integrity management program that contains all the elements described in § 192.911 and that addresses the risks on each covered transmission pipeline segment. The initial integrity management program must consist, at a minimum, of a framework that describes the process for implementing each program element, how relevant decisions will be made and by whom, a time line for completing the work to implement the program element, and how information gained from experience will be continuously incorporated into the program. The framework will evolve into a more detailed and comprehensive program. An operator must make continual improvements to the program.

Columbia Gas' integrity management program procedures were inadequate. Specifically, Columbia Gas' TEP-*ASV-RCV-US Line Break Control Analysis Procedures -US*, dated May 15, 2016 (IMP Procedure), failed to include the minimal factors in performing a risk analysis for determining the need for Automatic Shutoff Valves (ASV)/Remote Control Valves (RCV) to protect high consequence areas, as required by

§ 192.935(c)[4].

Columbia Gas' IMP Procedure under section 7.1 included an erroneous code section reference to 192.953(c) instead of 192.935(c), and only stated that the threat/risk factors it contains will be evaluated. No further details were included on what those threat/risk factors are and how they would be evaluated.

Therefore, Columbia Gas' integrity management procedures were inadequate. Columbia Gas must revise its IMP Procedure to include the correct code, § 192.935(c), as well as details on the specific threats/risk factors and processes that Columbia Gas will utilize in accordance with § 192.935(c).

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 Enforcement 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 **Columbia Gas Transmission, LLC** maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2020-015-NOA** 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.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter

[4] § 192.935 What additional preventive and mitigative measures must an operator take?

(a)…

(c) *Automatic shut-off valves (ASV) or Remote control valves (RCV).* If an operator determines, based on a risk analysis, that an ASV or RCV would be an efficient means of adding protection to a high consequence area in the event of a gas release, an operator must install the ASV or RCV. In making that determination, an operator must, at least, consider the following factors—swiftness of leak detection and pipe shutdown capabilities, the type of gas being transported, operating pressure, the rate of potential release, pipeline profile, the potential for ignition, and location of nearest response personnel.

pertains solely to one CPF case number.

Sincerely,

ROBERT T BURROUGH

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

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