

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

November 24, 2020

Mr. Gregg West
Vice President, Midstream Operations
Equitrans Midstream Corporation
2200 Energy Drive
Canonsburg, PA 15317

CPF 1-2020-019-WL

Dear Mr. West:

From July 27-31, 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 Equitrans Midstream Corporation's (Equitrans) procedures and records.

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

1. § 192.731 Compressor stations: Inspection and testing of relief devices.

(a) Except for rupture discs, each pressure relieving device in a compressor station must be inspected and tested in accordance with §§192.739 and 192.743, and must be operated periodically to determine that it opens at the correct set pressure.

Equitrans failed to inspect and test each pressure relieving device in a compressor station in accordance with § 192.743. Specifically, Equitrans failed to determine if three relief devices located in compressor stations were adequate from the standpoint of capacity by not considering relief valve inlet and outlet piping in capacity calculations required under § 192.743.

Section 192.743 states in part:

(a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in §192.739(b), the capacity must be consistent with the pressure limits of §192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.

(b) If review and calculations are used to determine if a device has sufficient capacity, the calculated capacity must be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates. After the initial calculations, subsequent calculations need not be made if the annual review documents that parameters have not changed to cause the rated or experimentally determined relieving capacity to be insufficient.

Equitrans' *Design and Construction Manual, Design Standard, Pressure Control, 7.2 Relief Device Design and Installation, Section 6.1 Relief Valve Capacity Calculation*, Revision Date 8/27/20, required a Relief Valve Calculation form to be created for each new relief device. The named procedure required the Relief Valve Calculation form to be reviewed if changes occur that affect the required capacity or relieving capacity.

With regard to inlet piping losses, Equitrans' *Design and Construction Manual, Design Standard, Pressure Control, 7.2 Relief Device Design and Installation, Section 4. Installation Requirements*, Revision Date 8/27/20, required that the total of all inlet pressure losses not exceed 3% of the relief device set pressure. The named procedure required that Crane Technical Paper No. 410, Eqn 3-5, or another approved method be utilized to calculate Inlet Losses at the rated device capacity for the relieving medium.

With regard to outlet piping losses, Equitrans' *Design and Construction Manual, Design Standard, Pressure Control, 7.2 Relief Device Design and Installation, Section 4. Installation Requirements*, Revision Date 8/27/20, required that Crane Technical Paper No. 410, Eqn. 3-5, or another approved method be utilized to calculate pressure losses in vent piping, and that Company approved software be used to calculate vent piping backpressure.

During the inspection, the PHMSA inspector requested records for capacity calculations of certain relief valves at compressor stations. The PHMSA inspector reviewed the Required Capacity and the Calculated Capacity documented within the Equitable Resources Annual Relief Valve/Auto Shut-off Device Inspection and Capacity Verification Reports for 3 relief valves located at Comet Compressor Station, Hartson Compressor Station, and Jefferson Compressor Station. The PHMSA inspector requested the supporting data for the calculations of both required capacity of the source of overpressure, and calculated capacity of the relief valve. Calculated capacity of the relief valve referenced the orifice area; however, the calculations were for the relieving device only and did not include consideration of inlet and outlet piping pressure losses which can limit relieving capacity.

Therefore, Equitrans failed to determine the adequacy of the capacity of three relief devices located at compressor stations by failing to consider inlet and outlet piping pressure losses in its calculations performed pursuant to § 192.743.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to 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. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. 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 item(s) identified in this letter. Failure to do so will result in Equitrans Midstream Corporation being subject to additional enforcement action.

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).

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2020-019-WL** 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.

Sincerely,

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