

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: restabrook@douglaspipeline.com

July 1, 2025

Mr. Ryan Estabrook
President
Douglas Pipeline Company
901 Castle Shannon Boulevard
Pittsburgh, Pennsylvania 15234

CPF 1-2025-026-NOA

Dear Mr. Estabrook:

From February 22 through July 24, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Douglas Pipeline Company's (DPC) procedures for its pipeline facilities in Shawville, Pennsylvania.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within DPC's plans or procedures. The items inspected and the alleged inadequacies and proposed revisions are described below:

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 once 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.

DPC's manual of written procedures for maintenance and normal operations were inadequate to ensure pipeline safety in accordance with section 192.605(a). Specifically, DPC's, *Operation and Maintenance Manual, Natural Gas Transmission Pipeline, for the Penn Production Group, Shawville Power plant, Clearfield County, PA, V.2023-2* (3/9/2024) (O&M Manual) failed to

provide adequate instructions for performing the annual review of its manual.

During the inspection, PHMSA requested information regarding DPC's process for reviewing its procedural manual pursuant to section 192.605(a). Section 1 of the O&M Manual states that "[t]his Manual is to be reviewed once per calendar year at intervals not exceeding 15 months. The review must be completed and documented by a Douglas Pipeline representative and representatives of the facility owner if applicable."

The O&M Manual failed to provide clear guidance on how the annual review must be documented. DPC's O&M Manual lacked information such as the roles and responsibilities of the reviewers, management approvals, statement of annual review and associated version number, origin date, and the effective date of the last revision on every document cover page.

After the inspection, DPC responded to PHMSA's request for items from the inspection, which included O&M Manual section 1, and also provided a revised *O&M, V.2023-24-1, cover page* (6/17/2024) and *O&M, V.2023-24-1, Manual Review Log* (6/17/2024). While the updated O&M Manual added two entries to the review log, these logged changes were unrelated to revisions to the process of performing the annual review of its manual.

Therefore, DPC's manual of written procedures for maintenance and normal operations were inadequate to ensure pipeline safety in accordance with § 192.605(a). PHMSA proposes that DPC must revise its procedures to include adequate instructions for performing the annual review of its manuals of written procedures pursuant to section 192.605(a), including specifying the roles and responsibilities of DPC personnel who perform these reviews.

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.

DPC's manual of written procedures for maintenance and normal operations were inadequate to ensure pipeline safety in accordance with section 192.605(b)(1). Specifically, DPC's O&M Manual failed to detail the steps that must be taken to prevent accidental ignition where gas presents a hazard of fire or explosion pursuant to section 192.751.

During the inspection, DPC presented its O&M Manual and its *Job Safety Analysis, Form 17, Revision 2* (12/21/21) (JSA). Both documents failed to provide adequate steps for preventing accidental ignition, such as isolating potential combustible vapors and eliminating all potential ignition sources through ensuring the proper grounding of equipment or appurtenances.

Additionally, O&M section 5 also stated "...Douglas Pipeline Company's Job Safety Analysis – Program 17 (JSA) shall be completed prior to performing tasks outside of normal operations and

maintenance....” DPC’s JSA process contained steps for preventing accidental ignition pursuant to section 192.751, but this requirement was not mandated for normal operations and maintenance work.

Therefore, DPC’s manual of written procedures for maintenance and normal operations were inadequate to ensure pipeline safety in accordance with section 192.605(b)(1). PHMSA proposes that DPC must revise its procedures and forms to address this deficiency.

3. § 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.

DPC’s manual of written procedures for maintenance and normal operations were inadequate to ensure pipeline safety in accordance with section 192.605(b)(1). Specifically, DPC’s O&M Manual failed to provide adequate instructions for determining the maximum allowable operating pressure for a pipeline (MAOP) segment in accordance with section 192.619.

Section 7.1 in DPC’s O&M Manual copied the regulatory text in section 192.619(a) without including additional detail specific to its pipeline facilities. For example, the O&M Manual failed to define the roles and responsibilities of DPC’s qualified personnel who are involved in the MAOP calculation and verification of technical data, not limited to pipeline design data and material properties. It also failed to specify which form is used to document the overall MAOP determination process. In addition, the O&M Manual failed to include the footnotes related to Table 1 in section 192.619(a)(2)(ii).

Therefore, DPC’s manual of written procedures for maintenance and normal operations were inadequate to ensure pipeline safety in accordance with section 192.605(b)(1). PHMSA proposes that DPC must revise its procedures to include the overall process and roles and responsibilities of the involved personnel.

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.

(1) ...

(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

DPC’s manual of written procedures for maintenance and normal operations were inadequate to control corrosion in accordance with section 192.605(b)(2). Specifically, DPC’s O&M processes

for internal corrosion control were inadequate pursuant to the requirements of sections 192.475 and 192.477.

During the inspection, DPC presented its O&M sections 8.12 and 8.14. In addition, DPC presented its referenced *Standard Operating Procedure #40, Gas Sampling for Internal Corrosion – Monitoring, V-1* (5/19/2024) (SOP #40), *Standard Operating Procedure #40a, Visually Inspect Removed Pipe for Internal Corrosion, V-1* (8/26/2019) (SOP #40a), and *Standard Operating Procedure #40b, Measure Suspected Internal Corrosion, V-1* (8/26/2019) (SOP #40b). These procedures all lacked sufficient details, including:

- Section 8.12 failed to provide the specific action that DPC will take if internal corrosion is found. This section did not reference any SOP and primarily mirrored the language of section 192.475.
- Section 8.14 did not attribute the roles and responsibilities, and the procedure to follow for internal corrosion monitoring at DPC. It also did not specify the frequency of the gas quality sampling to monitor the potential corrosive constituents present in the gas supplied by Eastern Gas Transmission and PPG wells. Additionally, this section only listed water vapor and hydrogen sulfide as potential constituents.

After the inspection, DPC responded to PHMSA's requested items from the inspection and provided the following sections of its revised *O&M, V-3:2023-24-1* (06/17/24): section 8.12, section 8.13, and section 8.14, along with its referenced SOP #40 V-2 (8/23/2024). However, these revised sections still contained the following inadequacies:

- The revised section 8.12 now referenced specific SOPs to follow when pipe is exposed and if corrosion is found, but it still does not provide sufficient detail procedure of the investigation and actions to be taken to minimize internal corrosion when found and was found to still be primarily reiterative of section 192.475.
- The revised section 8.14 failed to call out the frequency of the gas quality sampling to monitor the potential corrosive constituents present in the gas supplied by Eastern Gas Transmission and PPG wells consistently with its revised *SOP #40, V-2, page 2* (8/23/2024) ("Samples from potential sources of pipeline contamination must be sampled quarterly when flowing gas into Douglas Pipeline Company operated systems.").
- The defined frequency of sampling in SOP #40, page 1 ("As necessary to determine if gas being transported in the pipeline has corrosive contaminants.") conflicted with the above frequency found on page 2.

Therefore, DPC's manual of written procedures for maintenance and normal operations were inadequate to control corrosion in accordance with section 192.605(b)(2). PHMSA proposes that DPC must revise its procedures to address the identified deficiencies.

5. § 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) ...

(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.

DPC's manual of written procedures for maintenance and normal operations were inadequate to ensure pipeline safety in accordance with section 192.605(b)(8). Specifically, DPC's O&M Manual failed to reference the documentation supporting the procedural effectiveness review and failed to define the frequency for performing the periodic effectiveness review.

During the inspection, DPC presented its O&M Manual, section 9.2. This procedure stated in part that "[t]he effectiveness and adequacy of procedures used in normal operations and maintenance, and by DPC's contractors, will be reviewed periodically by Douglas Pipeline technicians and supervisors ..." and "[p]rocedures will be modified should any deficiencies be found. Exhibit 1 of this manual will document this procedure review which will occur periodically and as needed should the operator deem a procedure review is necessary...."

O&M Manual section 9.2 referred to an Exhibit 1 of the manual as the form for documenting the procedural effectiveness review, but the O&M Manual did not contain a form labeled as Exhibit 1. Instead, DPC's *Operator Personnel – Procedure Effectiveness* appeared to be the form DPC utilized, as it contained a log of the findings and revisions of the reviewed procedure, reviewers, and review dates. The procedure also failed to describe how the effectiveness review is performed to determine if the procedure is adequate, and how often DPC must perform the effectiveness review.

Therefore, DPC's manual of written procedures for maintenance and normal operations were inadequate to ensure pipeline safety in accordance with section 192.605(b)(8). PHMSA proposes that DPC must revise its procedures to addresses the inadequacies discussed above.

6. § 192.615 Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(1) ...

(12) Each operator must develop written rupture identification procedures to evaluate and identify whether a notification of potential rupture, as defined in § 192.3, is an actual rupture event or a non-rupture event. These procedures must, at a minimum, specify the sources of information, operational factors, and other criteria that operator personnel use to evaluate a notification of potential rupture and identify an actual rupture. For operators installing valves in accordance with § 192.179(e), § 192.179(f), or that are subject to the

requirements in § 192.634, those procedures must provide for rupture identification as soon as practicable.

DPC's written procedures to minimize the hazards resulting from gas pipeline emergencies were inadequate to ensure pipeline safety in accordance with section 192.615(a)(12). Specifically, DPC's *Emergency Response Plan, V.3.2023-24* (7/1/2023) (ERP) and its O&M Manual were inadequate as they did not provide a sufficient detailed plan for DPC personnel to follow to investigate and identify a potential rupture.

During the inspection, DPC presented its ERP section 7 which stated in part that "[w]hen there is an unexpected or unexplained pressure loss outside of the pipeline's normal operating pressures (as defined in the O&M manual), procedures shall be employed to survey the system and eliminate conditions that could endanger life or property."

When PHMSA requested to see the procedures referenced in DPC's O&M Manual, DPC presented O&M Manual, section 12.1, Rupture Identification 192.615(12). This procedure failed to include specific steps for potential rupture identification as required in DPC's ERP. Instead, it stated that "[e]ach operator must develop written rupture identification procedures to evaluate and identify whether a notification of potential rupture, as defined in section 192.3, is an actual rupture event or a non-rupture event." The ERP and O&M Manual lacked clear criteria for what magnitude of pressure loss is outside the pipeline's normal operating pressures pursuant to section 192.635(a)(1), and it failed to discuss the criteria in sections 192.635(a)(2) and (a)(3). Moreover, the O&M Manual was improperly referenced as it lacked specific information related to the section 192.635 requirements.

Therefore, DPC's written procedures to minimize the hazards resulting from gas pipeline emergencies were inadequate to ensure pipeline safety in accordance with section 192.615(a)(12). PHMSA proposes that DPC must revise its procedures to provide sufficient guidance for identifying potential ruptures.

7. § 192.805 Qualification program.

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

(a) ...

(e) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;

DPC's written qualification program was inadequate to ensure pipeline safety in accordance with section 192.805(e). Specifically, DPC's *Natural Gas Pipeline Operator Qualification Program, V-14*, (8/31/2023) (OQ Plan) failed to include adequate provisions for granting exceptions to requalification requirements for individuals disqualified from a covered task due to prolonged periods of physical, mental, or medical impairment.

DPC's OQ Plan, section 3.8 stated in part "[n]ote: Disqualification because of a physical, mental, or medical impairment may not require remediation and re-qualification."

During the inspection, DPC presented its OQ Plan. However, the OQ Plan did not clearly define

the conditions under which someone disqualified due to physical, mental, or medical impairment could either follow specific re-qualification steps or perform a covered task under the direction and observation of a qualified individual, in accordance with section 192.805(b) and section 192.805(c).

Therefore, DPC's written qualification program was inadequate to ensure pipeline safety in accordance with section 192.805(e). PHMSA proposes that DPC must revise its procedures to clarify when an individual must be requalified under these circumstances.

Response to this Notice

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 section 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 CFR § 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 Douglas Pipeline Company 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, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2025-026-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings