



City of Duluth

DEPARTMENT OF PUBLIC WORKS/UTILITIES
Engineering Division
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July 20, 2011

Mr. David Barrett
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
Suite 462
901 Locust Street
Kansas City, MO 64106-2641

Re: CPF 3-2011-1005M

Dear Mr. Barrett:

On May 10-12, 2010, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Minnesota Office of Pipeline Safety (MNOPS), pursuant to Chapter 601 of 49 United States Code, inspected the City of Duluth Public Works and Utilities interstate natural gas transmission pipeline in Duluth, Minnesota.

We are not contesting the Notice of Amendment dated April 7, 2011 and as a result of this inspection and the subsequent Notice we are submitting the following changes that have been made to our plans and procedures to address the referenced inadequacies:

- Item 1: **§192.13(c) and 192.225(b)** – According to API Standard 1104 for the welding procedure specification, the range of pipe diameters is only a suggested grouping and pipe diameter is not an essential variable which when changed requires re-qualification of the welding procedure. However, the attached Welding Procedure Specification DPWU-3 has been qualified using 10.500" outside diameter, 0.250" wall thickness, X-60 pipe for pipe outside diameter grouping greater than or equal to 2.375" to less than or equal to 12.750".
- Item 2: **§192.605(a) and (b)(8)** – Procedures to evaluate work performed by operating personnel and to modify procedures when deficiencies are identified have been added to the attached Section 01.01 General (192.605) of the Gas Operation & Maintenance Manual.
- Item 3: **§192.605(b)(4) and 191.15(a)** – Procedures for filing Form 7100.2 for transmission line incidents have been added to the attached Section 07.02.02 Written Distribution (191.9) & Transmission (191.15) System Incident Reports of the Gas Operation & Maintenance Manual.
- §192.605(b)(4) and 191.15(b)** – Procedures for filing supplemental incident reports as soon as practical have been added to the attached Section 07.02.02 Written Distribution (191.9) & Transmission (191.15) System Incident Reports of the Gas Operation & Maintenance Manual.

Item 4: **§192.605(b)(2) and 192.461(a)** – The procedures for external protective coating are in compliance with the manufacturer's recommendations for Tapecoat 20 Hot Applied Coal Tar Pipeline Coating which is one of the products specified for this use. The manufacturer recommends an overlap for both spiral wrap and cigarette style wrap of 1/4" to 1". Current procedures specify a 1/2" overlap for spiral method and a 1" overlap for the cigarette method. However, a note that tape shall be installed in accordance with the manufacturer's recommendations has been added to the attached Section 25.06 Field Coating Application (Below Grade) of the Gas Operation & Maintenance Manual.

Written procedures for patch stick repairs in accordance with the manufacturer's recommendations have been added to the attached Section 25.06 Field Coating Application (Below Grade) of the Gas Operation & Maintenance Manual. Hot melt patch sticks have also been added as a hot applied coating to the attached Section 14.06.04.B Field Coatings (Below Grade) – Hot Type Applications of the Gas Operation & Maintenance Manual.

Item 5: **§192.605(b) and 192.465(b)** – The attached Section 09.11 Rectifiers of the Gas Operation & Maintenance Manual has been revised to require rectifier inspections at intervals not exceeding 2-1/2 months or at least 6 times per year.

Item 6: **§192.605(b) and 192.479(a)** – Materials for coating soil to air interfaces have been added in the attached Section 14.06.05.E Field Coatings (Above Grade) of the Gas Operation & Maintenance Manual.

Item 7: **§192.605(b) and 192.481(c)** – Procedures for monitoring atmospheric corrosion have been revised by adding documentation for inspecting the condition of pipe supports and soil to air interfaces on the Atmospheric Gas Main Corrosion Report and Mains Where Physical Damage or External Loading Could Occur Report, included with the attached Section 09 Corrosion Control (192.453) of the Gas Operation & Maintenance Manual. The attached Section 09.15.A Atmospheric Corrosion – Monitoring Pipeline of the Gas Operation & Maintenance Manual already requires special inspection of pipe supports and soil to air interfaces. An addition has been made to this section specifying corrective action procedures to be taken when atmospheric corrosion is found on steel pipeline and a timeline for completion of corrective actions.

Item 8: **§192.605(b)(1) and 192.617** – Procedures for addressing protection and preservation of physical evidence in the investigation of failures have been added in the attached Section 06.03.B Pipeline Failure Investigation – Investigation of the Gas Operation & Maintenance Manual. In addition, a Chain of Custody Record form has been added to the attached Section 06 Failure Investigation (192.617) of the Gas Operation & Maintenance Manual for documenting the chain of custody for material evidence associated with a failure.

Item 9: **§192.605(b) and 192.705(a)** – Documentation of procedures for follow-up when transmission line patrolling identifies conditions requiring further action and for completing the annual patrol of the entire transmission line have been added to the

attached City of Duluth Transmission Main Patrol form included with Section 35.01 General of the Gas Operation & Maintenance Manual.

Item 10: **§192.605(b) and 192.707(a)** – Procedures for placing and maintaining line markers at highway and railroad crossings have been added to the attached Section 05.10 Gas Line Markers of the Gas Operation & Maintenance Manual.

§192.605(b) and 192.707(c) – Procedures specifying that line markers will be maintained have been added to the attached Section 05.10 Gas Line Markers of the Gas Operation & Maintenance Manual for buried pipelines and to the attached Section 05.11 Exposed Pipeline Signs/Labels of the Gas Operation & Maintenance Manual for exposed piping.

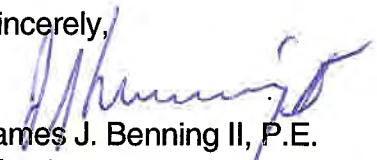
Item 11: **§192.605(b) and 192.709(a)(b)** – Procedures for maintaining records of repairs to the transmission line have been included in a new Maintenance section added to the attached Section 37.02 Record Retention Table of the Gas Operation & Maintenance Manual.

Item 12: **§192.605(b) and 192.727(b)** – Procedures for purging the transmission line are included in the attached Section 13.02 Purging 10" Great Lakes Interconnect Transmission Line from Gas to Air and Section 13.03 Purging 10" Great Lakes Interconnect Transmission Line from Air to Gas of the Gas Operation & Maintenance Manual. Procedures for purging the transmission line in the attached Section 20.03 Transmission Line include a reference to Section 13.02 Purging 10" Great Lakes Interconnect Transmission Line from Gas to Air and Section 13.03 Purging 10" Great Lakes Interconnect Transmission Line from Air to Gas of the Gas Operation & Maintenance Manual. A reference to preparing a procedure for abandoning any transmission pipeline in place prior to any work has been added to the attached Section 21.02 Abandoning Transmission Lines and Gas Mains of the Gas Operation & Maintenance Manual.

Item 13: **§192.605(b) and 192.745(a)** – Procedures and details of transmission line valve inspections have been added to the attached Section 33.02 Transmission Line Valves of the Gas Operation & Maintenance Manual.

Should you have any questions or concerns please do not hesitate to contact me or Larry Winner, Project Engineer.

Sincerely,



James J. Benning II, P.E.

Director

Department of Public Works and Utilities

cc: Larry Winner
Eric Shaffer
Howard Jacobson
Steve Lipinski

Nick Petrangelo
Tim Beber