Columbia Pipeline Group

Columbia Gas Transmission LLC

**Michael Hoffman**
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November 7, 2014

Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

**RE: CPF 1-2014-1010**

Dear Mr. Coy:

This letter is provided on behalf of Columbia Gas Transmission, LLC (Columbia Gas) in response to the Notice of Proposed Violation (NOPV) and Proposed Civil Penalty CPF 1-2014-1010 letter dated October 6, 2014, and received by Columbia Gas on October 07, 2014. Columbia Gas then requested PHMSA's violation report and additional time to respond to the NOPV. PHMSA provided the violation report via a letter dated October 10, 2014, received on October 14, 2014 and granted an extension of the time in which to respond until 30 days after receipt of the violation report. Columbia Gas appreciates the additional time to respond.

The NOPV and Proposed Civil Penalty were issued following inspections conducted by the Pipeline and Hazardous Materials Safety Administration (PHMSA) with West Virginia Public Service Commission (WV PSC) on June 10, 2013, of the Columbia Gas Transmission Clendenin Compressor Station. One item was noted in the NOPV and a civil penalty of $40,300 was proposed. Within this correspondence, we have provided clarifications that we believe demonstrate that no violations took place. Columbia Gas respectfully requests that PHMSA withdraw the allegation of violation and associated proposed civil penalty.

The language from the NOPV is provided in bold below, followed by our response.

1. **§191.605 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.**

**CGT failed to follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities. Specifically, CPG failed to follow their plan number 110.01.10, Lockout Tagout, effective 4/29/2013 when working on Compressor Station Unit 3 located in Compressor Building 3 at the Clendenin Compressor Station.**

**CGT's plan states, in part, the following [italics added]:**

***3.2 Primary Work Categories that will Require Lockout/Tagout***

> ***This section . . . is an outline of typical situations that subject employees to hazards that can be eliminated or minimized by the locking/tagging out of energy sources:***

***Examples of Work Categories:***

- ***Equipment installation, maintenance, lubrication, and repair.***
- ***Electrical installation and repair.***
- ***Hydraulic and pneumatic system installation and repair.***
- ***Work on pipelines, vessels, measurement and regulation equipment, compressors, and wells. Includes launchers & receivers for pigging operations and pipeline cleaning projects.***

**According to CGT's lockout/tagout procedures and checklist, CGT completed the lockout and tagout for Unit 3 on 6/3/2013. The checklist indicates that CGT isolated the equipment from all energy sources relevant to the scope of work, including electrical, gas and compressed air, at that they had locked and tagged all energy-isolating devices.**

**During the inspection on 6/10/2013, the WV PSC inspector observed that Compressor Unit 3 was partially disassembled for maintenance repairs. The inspector asked CGT to identify the locations of the energy sources that CGT had locked out on 6/3/2013. CGT personnel could not demonstrate that they had locked out either the electrical or compressed air energy sources.**

**Photographs of the breaker for Compressor Unit 3 show the breaker in the "on" position and a photograph for the electrical switch for the compressor shows the switch was tagged but not locked. CGT personnel acknowledged that the electrical panel was not locked out and that the compressed air line connected to the compressor did not have any shutoff valves and that the compressed air system was still in service.**

The proposed NOPV relates to whether Columbia Gas isolated all energy sources relevant to the scope of work being conducted on Unit 3 in June of 2013 in accordance with its procedures. As further explained below, Columbia Gas did isolate all sources of energy relevant to the work being conducted on Unit 3 during the June 2013 inspection.

Unit 3 is a 3,000 horsepower Cooper-Bessemer LSV-12 natural gas powered four cycle engine installed in 1967. The engine powers a natural gas compressor unit. On June 3, 2013, Columbia Gas personnel initiated a project to remove and replace the exhaust manifold on the compressor engine. The exhaust manifold is located on top of the unit and directs engine exhaust to the engine muffler and flue. To prepare for the work, the engine fuel gas to the unit was locked and tagged

out. In addition, the engine's turning gear was engaged in the unit (see photograph in Attachment A) to render the unit inoperable and a tag was placed on the engine panel. The turning gear is a worm gear integral to the unit which, once engaged, locks the engine drive shaft making it physically impossible for the unit to operate. With the exception of the exhaust gases that would be present only when the engine is operating, there are no other energy sources or moving parts that would be encountered from the unit during the removal and replacement of the exhaust manifold. A photograph showing a Cooper Bessemer LSV-12 unit with the exhaust manifold removed is included in Attachment B. Columbia Gas disabled the unit and removed all energy sources relevant to the work conducted on the exhaust manifold on Unit 3.

The NOPV alleges that since Columbia Gas could not demonstrate that the electrical or compressed air energy sources were isolated, that a violation had occurred. Isolation of the electrical and compressed air energy sources was not germane to the isolation of Unit 3 for the work being conducted, namely the removal and replacement of the exhaust manifold. Unit 3 engine can be switched on and off by a control panel located next to the unit. The control panel is provided with 24 volt electrical service and compressed air. As noted above, Unit 3 is a natural gas powered compressor unit. There is no outside electrical service provided to the Unit 3 engine itself. The 24 volt electrical service only services the control panel and not the engine. As the engine was already disabled through engagement of the turning gear and as electrical service was only provided to the control panel, and not the engine itself, isolation of the electrical service to the engine panel was not relevant to work on the exhaust manifold of the engine. In addition, the compressed air is used in the control panel and to start the engine. However, there was no exposure to any compressed air energy sources from the engine associated with the removal and replacement of the exhaust manifold.

In summary, Unit 3 exhaust system was isolated from all relevant energy sources during the removal and replacement of the exhaust manifold in June 2013 and no hazard to Columbia Gas employees or the public existed as the result of that work. Columbia Gas, therefore, respectfully requests removal of the alleged violation in the NOPV as well as the associated proposed civil penalty.

Based on the information provided within this correspondence, we respectfully request withdraw of the alleged violation and associated proposed civil penalty. Should you have any questions, require any additional information or would like to meet to discuss any of the information above, please do not hesitate to contact me.

Sincerely,

Perry M. Hoffman
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