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**A report by the Staff of the
Public Utilities Commission of Ohio**

**In the Matter of the Investigation of
Columbia Gas of Ohio, Inc. Relative to its
Compliance with the Natural Gas Pipeline
Safety Standards and Related Matters
Case Number 10-459-GA-GPS**

April 12, 2010

**Ohio | Public Utilities
Commission**

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Technician SM Date Processed APR 13 2010

In the Matter of the Investigation)
of Columbia Gas of Ohio)
Relative to Its Compliance with)
the Natural Gas Pipeline Safety)
Standards and Related Matters)
)
)

Case No. 10-459 -GA-GPS

To the Honorable Commission:

Staff has conducted an investigation in the above matter and hereby submits its findings and recommendations in this Gas Pipeline Safety Staff Report.

The findings and recommendations reached in this Staff Report are presented for the Commission's consideration and do not purport to reflect the views of the Commission, nor should any party consider the Commission as bound in any manner by the findings and recommendations set forth herein.

Respectfully submitted,



Peter A. Chace
Chief, Gas Pipeline Safety Section
Service Monitoring and Enforcement Department

Background

Columbia Gas of Ohio, Inc. (Columbia) provides natural gas service to over 1.3 million customers in Ohio through approximately 21,000 miles of pipeline. It is a natural gas company subject to the jurisdiction of the Public Utilities Commission of Ohio ("Commission") under Title 49, Ohio Revised Code, and under rules adopted by the Commission and found in the Ohio Administrative Code (O.A.C.) Chapter 4901:1-16, ("pipeline safety code") with regard to natural gas pipeline safety matters. This case was initiated after Gas Pipeline Safety (GPS) Staff of the Commission ("Staff") investigated a pipeline safety incident at 21081 Westwood Drive, Strongsville, Ohio that occurred on November 27, 2008. As a result of this investigation, Staff issued Columbia a Notice of Probable Non-Compliance with 49 C.F.R. 192.617.

Staff Investigation

Staff investigated a fire at 21081 Westwood Drive, Strongsville, Ohio that occurred on November 27, 2008. This fire was caused by a release of gas from a regulated pipeline that resulted in an estimated property damage of \$50,000 or more, meeting the definition of an Incident according to O.A.C. 4901:1-16-01 and was reportable to both the Commission and the U.S. Department of Transportation under 4901:1-16-05 (A)(1) and 49 C.F.R. 192. Initial investigation revealed that the service line leading to the property did not hold pressure, but excavation did not occur until February 25, 2009 after protocols for investigation were developed. At the time of excavation, Staff observed a failed mechanical compression coupling joining the service line to the riser however the cause of failure was not readily identifiable.

The federal Pipeline Safety Code requires that failed components be subject to a laboratory examination in order to determine the cause of failure:

49 C.F.R. 192.617 Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

A series of correspondence initiated by Staff to Columbia over the period of December 10, 2008 to November 17, 2009 notified Columbia of their responsibility under 49 C.F.R. 192.617 to determine the cause of the mechanical compression coupling failure through laboratory examination. Copies of written correspondence are attached and labeled as "Appendix A".

Columbia's failure to determine the cause of the mechanical compression coupling failure through laboratory examination prompted Staff to issue to a Notice of Probable Noncompliance

("Notice") to Columbia on December 2, 2009. The Notice expressed Staff's determination that Columbia failed to comply with 49 C.F.R. 192.167. A copy of the Notice is attached and labeled as "Appendix B".

Over a month later, Michael Ramsey, Columbia's Operations Compliance Manager, responded to the Notice. A copy of this letter is attached and labeled as "Appendix C". In the letter, he offered the following statement:

"Columbia contacted the property owner's representatives to request that a failure analysis be conducted on the materials from the above referenced incident. Columbia was prepared to take possession of the materials and have the failure analysis if the property owner's representatives were not planning to proceed with the analysis. Columbia was informed that the property owner's representatives had authorized the disposal of the materials from the above referenced incident. Columbia's attorneys have requested confirmation that the materials related to the above referenced incident have been discarded. At this time, Columbia has not received a response from the property owner's representatives."

Staff responded to the above letter on January 15, 2010 with a request for additional information, asking Columbia to provide any history of correspondence with the property owner's representatives or insurance companies regarding the taking, failure analysis, destruction or disposal of any equipment or materials involved in the incident, and for a copy of Columbia's Operations and Maintenance manual that was in effect on November 24, 2008 as it related to Part 192.617. A copy of this data request is attached and labeled as "Appendix D".

Michael Ramsey responded to this request on February 1, 2010. His letter referenced a number of emails, letters and phone calls related to taking materials from the incident, conducting a failure analysis, and the destruction and/or disposal of equipment or materials involved in the incident. Copies of Columbia's Operations and Maintenance Plan ("OMP") in effect at the time of the incident were also provided. A copy of this letter and associated documents is attached and labeled as "Appendix E".

Columbia's OMP contained a section for *Investigation of Failures* including a specific section for *Testing Specimens* as required by Part 192.617. Columbia's OMP section 1652 (2) states:

As soon as the incident site has been made safe, rapid response will be necessary for preserving the integrity of the specimens and gathering information pertinent to the investigation. If the cause of the accident or failure is not readily identifiable, the Company should take care to maintain the incident site in as undisturbed a condition as possible until further investigation may be under taken.

The Company should take the following actions in conducting a field investigation as to the cause of the failure or accident.

- a. Obtain or develop a list of personnel, equipment, and witnesses involved in the event.*
- b. Obtain or develop a chronological list of events.*
- c. Take photographs of site and/or equipment.*
- d. Preserve evidence.*
- e. Determine if tests are needed and whether laboratory analysis or outside consultants are warranted to determine the cause of the failure. Refer to Section 3 for guidance on testing specimens.*

Columbia's OMP section (3) *Testing of Specimens* states: "(t)esting of specimen should be considered when:

- a. Questions exist as to the cause (why) of failure.
- b. Questions exist as to the method (how) of failure.
- c. the failure resulted in a DOT reportable incident.
- d. litigation is likely"

In its Pipeline Failure Investigation Report filed on February 16, 2010, Staff concluded that a mechanical coupling connecting the plastic service to the steel riser had pulled out, but Columbia had not provided information that the coupling had been tested for the purpose of determining the cause of the failure. The report is attached and labeled as "Appendix F".

At Staff's request, a meeting was held at the Commission's offices on March 1, 2010 between members of the Staff and Columbia representatives to provide Columbia an opportunity to offer additional details regarding efforts made to recover the physical evidence and preserve it for testing. Columbia provided no additional documentation regarding any such efforts to preserve and test or to inform the owner or his representative of Columbia's obligation to test. On March 9, 2010 Staff did receive a letter written to Chuck McCreery of NiSource from Columbia's consultant, SEA, which stated, subsequent examination of the subject pipe and fitting through the use of photogrammetry concluded the incident was caused by compression fitting pullout as a result of improper installation. The letter did not state specifically when this examination was performed, nor did it provide even a basic explanation of the photogrammetry process used.

Discussion of Violations

Columbia, an operator as defined in 49 C.F.R. Part 192.3, reported an incident as required under O.A.C. 4901:1-16-01(L), 4901:1-16-05 (A)(1) and 49 C.F.R. 192. The incident was caused by a failed compression coupling and under 49 C.F.R. Part 192.617 Columbia had a duty to establish procedures for analyzing failures, including the selection of samples of the failed facility or equipment for laboratory examination to determine the cause of failure. Columbia had procedures through its OMP sections (2) *Investigation of Failures and Accidents* and (3) *Testing Specimens* which required the company to strongly consider testing a specimen when the failure resulted in a DOT reportable incident. Columbia failed to follow this procedure and test the coupling to determine the cause of failure.

Conclusions and Recommendations

The Staff concludes that Columbia is in probable non-compliance with 49 C.F.R. 192.617 of the federal pipeline safety code. Columbia, both under C.F.R. Section 192.617 and its own OMP in effect at the time, was obligated to actively secure and preserve the integrity of the incident site and, because the cause of the failure was not readily identifiable, to perform or cause to be performed further investigation and analysis on the failed component. While the Staff appreciates that the property owner's insurer may have made this more difficult, this very important obligation still resides with Columbia. Despite repeated opportunities to do so, Columbia failed to demonstrate to the Staff that it actively and diligently made efforts to carry out its obligations. By failing to determine the root cause of the November 27, 2008 incident, Staff concludes that Columbia did not adhere to its OMP.

Staff recommends Columbia modify its OMP to specifically require, in the case of a reportable incident, that its employees take possession of the failed facility or equipment for the purpose of laboratory examination. If, through due diligence, Columbia is unable to secure the failed facility or equipment, Columbia must notify the customer or property owner in possession of the facility or equipment of Columbia's duty to perform analysis and testing, and its willingness to take possession of the evidence for purposes of laboratory examination if the customer is unable or unwilling to do so.

The Staff also recommends that a civil forfeiture of \$10,000 be assessed against Columbia for the violation of Title 49 C.F.R. Part 192.617.

Appendix A

**Correspondence between Staff and Columbia Gas of Ohio
December 10, 2008-November 17, 2009**

Below is a summary of the reportable incident which occurred in Strongsville on Thanksgiving afternoon, Thursday, November 27, 2008.

Around 1430 pm on Thursday November 28, 2008 a report was made to the Strongsville Fire Department regarding an odor of gas near the intersection of Prospect and Westwood Drive. At approximately 1524 pm, while the Strongsville Fire Department was in the vicinity investigating the odor complaint, the building at 21081 Westwood caught fire. The Strongsville Fire Department then notified Columbia Gas.

A COH Service Technician was onsite within 10 minutes of being dispatched. Upon arrival then called for a plant crew to dig-up the curb valve to shut off gas service to the building.

The building was a pet care business and was boarding dogs and cats. All of which survived. However, the building sustained severe fire damage.

After the fire was extinguished, COH attempted to perform a pressure test of the service line and riser to operating pressure, which did not hold. The service is a 1" plastic service which was inserted in 1978. The riser is a 1" pre-bent, which was later found to have been cathodically protected using a spike anode and read -0.58 volt.

Columbia reported the incident to the PUCO on Thanksgiving evening, Thursday, November, 27, 2008 at 1906.

I received a text message on my cell phone from Ed Steele at 1120 on Friday, November 28, 2008 asking me to report to Strongsville, with Tyler Ford, on Monday, December 1, 2008 to investigate a reportable incident. On Monday, we arrived at the scene around 1030. Mr. Ford and I examined the fire damage to the meter, riser and building. We took several photographs of the fire damage. Later that afternoon, we met with Brian Collins, COH FOL and Mike Tice, COH Area Manager. Mr. Ford and I reviewed the facts of the incident with Mr. Collins and Mr. Tice. We then made a data request for some additional information.

After nearly three months had passed from the date of the incident, a group of Cause and Origin experts representing the interested parties along with COH's expert met at the scene on February, 25, 2009 to begin the site investigation. The service line was re-pressurized with air and did not hold. A decision was made to excavate the riser. Upon excavation, it was discovered the 1" plastic service had separated (pulled-out) from a 1" mechanical coupling (ell) connecting the plastic service to the steel riser. The riser and coupling was removed and taken in to possession by the insurance company representing the buildings owner.

Once the riser was removed another pressure test of the service line was attempted. It was discovered water had accumulated in the service line from the time of the incident and needed to be removed. Using air, the line was blown dry. Next, the end nearest the building was capped and then the line was re-pressurized to operating pressure from the street. The line held.

Correspondences to and from Columbia

December 10, 2008 – Email to Columbia

Rob,

I want to formalize my request to have PUCO, Gas Pipeline Safety Investigator(s) present during the excavation of the riser at the above referenced incident location.

Also, because this is an ongoing incident investigation, the preservation of the riser/site is paramount to the incident investigation. I assumed this has been conveyed this to the building owner(s), so there will be no demolition of the building until the riser has been removed?

Please advise me when a date has been scheduled to remove the riser. It may be best to email me and to also contact me on my cell phone at (614) 561-6228.

Thanks for your cooperation,

Paul

Paul W. Hollinger
Engineer, Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215
Cell: (614) 561-6228
Paul.Hollinger@puc.state.oh.us

COH Response – January 16, 2008

Paul,

Columbia Gas of Ohio (Columbia) has completed the initial investigation and on December 23, 2008 reported the results to PHMSA and the Public Utilities Commission of Ohio. Columbia engaged a third party cause and origin consultant to assist with the investigation which included the testing of all Columbia owned facilities.

During the initial investigation Columbia received a letter from the property owners demanding that Columbia not disturb the customer owned service line or riser. Columbia is obligated to comply with this request.

Earlier this week Columbia contacted the property owners and were told that they had retained a mechanical engineer to conduct the cause and origin investigation. The property owners plan to meet the mechanical engineer on site within the next week and then plan to have the investigation protocol prepared and a time and date for the investigation established within a week of their site visit.

Columbia will provide you with the details for the cause and origin investigation as soon as that information becomes available to us. Please let me know if you have questions or Rob or I can be of further assistance.

Sincerely

Michael Ramsey
Operations Compliance Manager
Columbia Gas of Ohio, Inc.
Office - 614-460-4731
Fax - 614-460-4265
Cell - 614-554-4100

July 23, 2009 – Follow-up Email to Columbia

Rob,

I wanted to follow-up with you regarding the testing of the compression fitting from the Strongsville incident.

When do you foresee this fitting being tested and disassembled since it appears to have "pulled-out"?

Thanks,
Paul

Paul W. Hollinger

Engineer, Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215
Cell: (614) 561-6228
Paul.Hollinger@puc.state.oh.us

NO RESPONSE

September 17, 2009 – Follow-up email to Columbia

Michael,

During our meeting in August at Westerville regarding another matter, I asked when COH was planning on testing the compression coupling from the Strongsville Incident. At that time you said you were going to discuss this with your attorneys since COH doesn't have possession of this fitting. Since that time I have not heard back from you regarding this matter and wanted to follow-up with you.

As we discussed, we feel since the service line appears to have pulled-out from this fitting, it needs to be investigated under 192.617 as to why it did so.

Please advise what your time frame is on having this fitting tested.

Thanks,
Paul

Paul W. Hollinger
Engineer, Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215
Cell: (614) 561-6228
Paul.Hollinger@puc.state.oh.us

NO RESPONSE

October 19, 2009 – Follow-up email to Columbia

Michael,

I have not heard back from you on this issue as of today. Can you please explain COH's position on this matter?

Thanks,

Paul Hollinger

From: Hollinger, Paul
Sent: Thursday, September 17, 2009 11:37 AM
To: 'mramsey@nsource.com'
Subject: Strongsville Incident

Michael,

During our meeting in August at Westerville regarding another matter, I asked when COH was planning on testing the compression coupling from the Strongsville Incident. At that time you said you were going to discuss this with your attorneys since COH doesn't have possession of this fitting. Since that time I have not heard back from you regarding this matter and wanted to follow-up with you.

As we discussed, we feel since the service line appears to have pulled-out from this fitting, it needs to be investigated under 192.617 as to why it did so.

Please advise what your time frame is on having this fitting tested.

Thanks,
Paul

Paul W. Hollinger
Engineer, Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215
Cell: (614) 561-6228
Paul.Hollinger@puc.state.oh.us

NO RESPONSE

November 16, 2009 – Follow-up email to Columbia

Michael,

When we last spoke about this issue on Friday, October 30th you stated a letter will be going out from COH's attorney's the following week to the owners of the

pipng involved with both the Mansfield and Strongsville incidents regarding COH's Federal requirement (192.617) to have those pieces investigated as to why they failed.

As of today, I have not heard back regarding the status of the letter or testing.

Can you please provide me with an update?

Thanks,
Paul Hollinger

From: Hollinger, Paul
Sent: Thursday, September 17, 2009 11:37 AM
To: 'mramsey@nisource.com'
Subject: Strongsville Incident

Michael,

During our meeting in August at Westerville regarding another matter, I asked when COH was planning on testing the compression coupling from the Strongsville Incident. At that time you said you were going to discuss this with your attorneys since COH doesn't have possession of this fitting. Since that time I have not heard back from you regarding this matter and wanted to follow-up with you.

As we discussed, we feel since the service line appears to have pulled-out from this fitting, it needs to be investigated under 192.617 as to why it did so.

Please advise what your time frame is on having this fitting tested.

Thanks,
Paul

Paul W. Hollinger
Engineer, Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215
Cell: (614) 561-6228
Paul.Hollinger@puc.state.oh.us

COH Response – November 17, 2009

From: mramsey@nisource.com [mailto:mramsey@nisource.com]
Sent: Tue 11/17/2009 9:49 AM
To: Hollinger, Paul
Cc: rrsmith@nisource.com; jrtagga@nisource.com
Subject: Re: FW: Strongsville Incident

Paul,

I left you a message on your cell. The letters have not gone out, legal is good with the letters, but Corp Insurance is still considering the increase in liability for the Corporation. I was told yesterday that the letters would go out by this Friday. They will go out under my signature. I have attached a draft of the letter to request the testing when the customer's insurance company holds the materials. The notification letter when our Cause and Origin contractor holds the material is being finalized by SEA.

Please give me a call if you have questions.

Thanks,

Michael Ramsey
Manager Compliance
Columbia Gas of Ohio, Inc.
Office - 614-460-4731
Fax - 614-460-4265
Cell - 614-554-4100
(See attached file: CSL Draft Letter - Request.doc)

Appendix B
Notice of Probable Noncompliance
December 2, 2009



**Public Utilities
Commission**

Ted Strickland, Governor
Alan R. Schiber, Chairman

Commissioners

Ronda Hartman Fergus
Valerie A. Lemmie
Paul A. Centolella
Cheryl Roberto

December 2, 2009

John W. Partridge, Jr.
President
Columbia Gas of Ohio, Inc.
200 Civic Center Drive
Columbus, OH 43215

Dear Mr. Partridge:

On November 27, 2008, a representative of the Public Utilities Commission of Ohio conducted an incident investigation of a house explosion at 21081 Westwood Road, Strongsville, Ohio.

As a result of this investigation, the following probable noncompliance is being sent to Columbia Gas of Ohio, Inc. for review and written response within 30 days.

If you need more information, please call me at (614) 644-8983.

Sincerely,

Pete Chace, Program Manager
Gas Pipeline Safety Section
Facility and Operations Field Division

PC:bh

Enclosure

THE PUBLIC UTILITIES COMMISSION OF OHIO
GAS PIPELINE SAFETY SECTION

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

NOTICE OF PROBABLE NONCOMPLIANCE

Sent to John W. Partridge, Jr. Title President
Operator Columbia Gas of Ohio, Inc.
Address 200 Civic Center Drive
City Columbus State OH Zip Code 43215
Date of Investigation 10/27/2008 Place of Investigation 21081 Westwood Road, Strongsville, OH
GPS Inspector Paul Hollinger

DESCRIPTION

ALL PROBABLE NONCOMPLIANCES LISTED BELOW SHOULD BE CORRECTED OR ACTION TAKEN TO CORRECT WITHIN 30 DAYS OF RECEIPT OF CERTIFIED LETTER.

(1) Section 192.617 (49 C.F.R.); Title: Investigation of failures

Describe Probable Noncompliance

192.617 *Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.*

Gas Pipeline Safety Section Staff observed pipe that had a failed mechanical compression coupling near the end of the riser. Columbia Gas has not provided information that this coupling has been tested for the purpose of determining the cause of the failure.

Return within 30 days to:

Program Manager, Gas Pipeline Safety Section
Public Utilities Commission of Ohio
180 East Broad Street, 7th Floor
Columbus, OH 43215-3793

For Other Information Call: Program Manager, Gas Pipeline Safety Section (614) 644-8983

OPERATOR'S RESPONSE

Action to be Taken (Starting / /):

I hereby acknowledge receipt of the above probable noncompliance notice and that to the best of my knowledge the above corrections are scheduled to start as indicated or have been completed.

Signature _____ Title _____ Date _____

Appendix C
Columbia Gas of Ohio Initial Response
January 6, 2010

January 6, 2010

Mr. Peter Chace
Manager of Gas Pipeline Safety Section
180 East Broad Street
Columbus, Ohio 43215

Re: Columbia Gas of Ohio – North Pointe Operating Center
Notice of Probable Noncompliance
Incident at 21081 Westwood Road, Strongsville, Ohio

Dear Mr. Chace:

This letter is in response the Notice of Probable Noncompliance (NOPN) dated December 2, 2009, and received by Mr. Partridge of Columbia Gas of Ohio, Inc. (Columbia), on December 7, 2009. Columbia has reviewed the identified probable noncompliance sets forth its responses below.

192.617

Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

Gas Pipeline Safety Section Staff observed pipe that had a failed mechanical compression coupling near the end of the riser. Columbia Gas has not provided information that this coupling has been tested for the purpose of determining the cause of the failure.

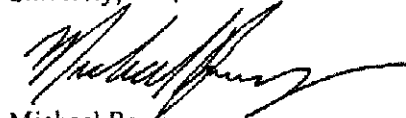
Response

Columbia contacted the property owner's representatives to request that a failure analysis be conducted on the materials from the above referenced incident. Columbia was prepared to take possession of the materials and have the failure analysis if the property owner's representatives were not planning to proceeding with the analysis. Columbia was informed that the property owner's representatives had authorized the disposal of the materials from the above referenced incident.

Columbia's attorneys have requested confirmation that the materials related to the above referenced incident have been discarded. At this time Columbia has not received a response from the property owners' representatives.

Should you have questions on need additional information please contact me at 614-460-4731.

Sincerely,



Michael Ramsey
Operations Compliance Manager
Columbia Gas of Ohio, Inc.

cc: Jack Partridge
David Monte
Charles Shafer

Appendix D
Staff Data Request
January 15, 2010

January 15, 2010

Mr. John W. Partridge, Jr.
President
Columbia Gas of Ohio, Inc.
200 Civic Center Drive
Columbus, OH 43215

Dear Mr. Partridge:

The Public Utilities Commission of Ohio (PUCO), Gas Pipeline Safety (GPS) section staff has received your response to our Notices of Probable Noncompliance dated December 7, 2009. The notice results from not testing a failed mechanical compression coupling to determine the cause of an explosion s part of an incident investigation of a house explosion at 21081 Westwood Road, Strongsville, Ohio.

The GPS Staff has reviewed your response and has the following questions:

1. Please provide any history of correspondence with the property owner's representatives or insurance companies regarding the taking, failure analysis, destruction or disposal of any equipment or materials involved in the incident.
2. Please provide a copy of Columbia Gas of Ohio, Inc. Operations and Maintenance manual that was in effect on November 24, 2008 addressing Part 192.617: *Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.*

Please provide this information by February 1, 2010.

If you require any additional information, please contact me at (614) 644-8983 or via e-mail at peter.chace@puc.state.oh.us

Sincerely,

Peter A. Chace
GPS Section Supervisor

PAC:th

Appendix E
Columbia Gas of Ohio Data Request Response
February 1, 2010

February 1, 2010

Mr. Peter Chace
Manager of Gas Pipeline Safety Section
180 East Broad Street
Columbus, Ohio 43215

PUCO
Service Monitoring & Enforcement

FEB - 2 2010

Re: Columbia Gas of Ohio -
Notice of Probable Noncompliance
Incident at 21081 Westwood Road, Strongsville, Ohio

Gas Pipeline Safety Section

Dear Mr. Chace:

Columbia Gas of Ohio, Inc. (Columbia) received a letter from the Public Utilities Commission of Ohio requesting additional information on the above referenced Notice of Probable Noncompliance (NOPN). The letter is dated January 15, 2010 and was received by Mr. Partridge of Columbia on January 23, 2010.

The letter requests the following:

1. Please provide any history of correspondence with the property owner's representatives or insurance companies regarding the taking, failure analysis, destruction or disposal of any equipment or materials involved in the incident.

Response:

While you requested only correspondence "with the property owner's representatives....regarding the taking, failure analysis, destruction or disposal of any equipment or materials involved in this incident"; we are also including copies of emails that confirm attempted telephone or other contact with those representatives that reflect Columbia's efforts related to your request. Some of these emails may be addressed to or include one or more of Columbia's in house counsel. To the extent that any of the email communications could be construed as protected from disclosure by legal privilege including, but not limited to the attorney client and work product privileges, Columbia waives such privilege only for the communications produced to the commission and specifically reserves its rights on all other protected communications or documents.

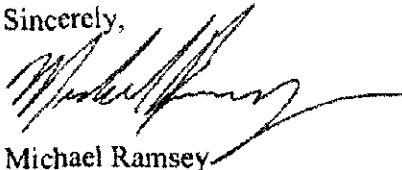
2. Please provide a copy of Columbia Gas of Ohio, Inc. Operations and Maintenance manual that was in effect on November 24, 2008 addressing Part 192.617.....

Response

Attached, per your request, are OMP 1652 "Investigation of Failures" and Policy and Procedure 555-1 "Investigation of Failures".

Should you have questions or need additional information please contact me at 614-460-4731.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Ramsey", with a long horizontal flourish extending to the right.

Michael Ramsey
Operations Compliance Manager
Columbia Gas of Ohio, Inc.

Attachments

Cc. Jack Partridge
David Monte
Charles Shafer



A PROFESSIONAL CORPORATION

1900 MARKET STREET PHILADELPHIA, PA 19103-3508 215.665.2000 800.523.2900 215.665.2013 FAX www.cozen.com

FACSIMILE

FROM: William E. Gericke
SENDER'S PHONE: 215.665.2146
OF PAGES (INCLUDING COVER): 3
DATE: December 10, 2008

TIMEKEEPER NO.: 1239
SENDER'S FAX: 215.701.2146
FILE NAME: CUYAHOGA LANDMARK, INC.
FILE #: 229944

RECIPIENT(S)	PHONE	FAX
Columbus Gas of Ohio	614-460-6000	614-460-4265

MESSAGE:

IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL [215.665.2000] or [800.523.2900] IMMEDIATELY.

THIS TRANSMISSION IS ALSO BEING SENT VIA:

- ☐ Regular Mail
☒ Certified Mail
☐ Hand Delivery
☐ Overnight Mail
☐ Federal Express
☐ E-Mail

NOTICE

The information contained in this transmission is privileged and confidential. It is intended for the use of the individual or entity named above. If the reader of this message is not the intended addressee, the reader is hereby notified that any consideration, dissemination or duplication of this communication is strictly prohibited. If the addressee has received this communication in error, please return this transmission to us at the above address by mail. We will reimburse you for postage. In addition, if this communication was received in the U.S., please notify us immediately by phoning and asking for the Fax Center.



A PROFESSIONAL CORPORATION

1900 MARKET STREET PHILADELPHIA, PA 19103-3508 215.665.2000 800.523.2900 215.665.2013 FAX www.cozen.com

William E. Gericke
Direct Dial 215.665.2144
Home Fax 215.665.2144
wgericke@cozen.com

December 10, 2008

**VIA FACSIMILE AND
CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Columbia Gas of Ohio
200 Civic Center Drive
Columbus, Ohio 43215

Re:	My Insured:	Cuyahoga Landmark, Inc.
	Loss Location:	21081 Westwood Drive Strongsville, Ohio
	Date of Loss:	11/28/08
	Our File No.:	229944

Dear Sir/Madam:

We represent Nationwide Insurance Company, the property insurer of Cuyahoga Landmark, Inc., whose property suffered damage and destruction from a fire that took place on or about November 28, 2008. I believe your company is already aware of the incident. Our investigation has determined that a gas leak from your underground gas line was the cause of the fire. That being the case, my client intends to look to your company as the party who is responsible for the loss.

We have also learned that your expert from S.E.A., Ltd., Steve Erlenbach (sp?) removed physical evidence from the HVAC/mechanical equipment at my insured's property. Although I am not certain why your consultant would remove anything from my insured's property without express permission to do so, or without notifying my insured, please have your consultant make arrangements with my consultant, Jim Churchwell, to return the evidence immediately. Mr. Churchwell can be reached at 330-688-6949. Please have your consultant make arrangements to return the physical evidence without delay.

Additionally, please preserve any evidence you removed from the underground gas line for our consultants to examine. Please preserve all telephone calls, emergency calls, calls related

Columbia Gas of Ohio
December 10, 2008
Page 2

to gas leaks and/or odors, radio calls, radio transcriptions, dispatch calls/records, emails, and any other documents, either in electronic, written or recorded format that relate to the incident and gas leak on November 28, 2008, until further notice regardless of your company's standard document retention policy.

If you would like to observe the interior of my insured's facility, please make arrangements to do so through Mr. Churchwell. Thank you.

Very truly yours,

COZEN O'CONNOR



BY: WILLIAM E. GERICKE

WEG:cmk

6505842600

P.01/01

TRANSACTION REPORT

DEC/10/2008/WED 05:10 PM

FAX(RX)

#	DATE	START T.	SENDER	COM. TIME	PAGE	TYPE/NOTE	FILE
001	DEC/10	05:08PM	2158648046	0:01:24	3	OK	SG3 3138



**STEPHOE &
JOHNSON**
ATTORNEYS AT LAW

Huntington Center, Suite 2200
41 South High Street
Columbus, OH 43215
(614) 271-5100 (614) 271-0952 Fax
www.stephoe-johnson.com

Writer's Contact Information

(614) 658-9792
tracy.turner@stephoe-johnson.com

January 13, 2009

By Facsimile and Regular Mail

William E. Gencke
Cozen, O'Connor
1900 Market Street
Philadelphia, PA 19103-3508

Re: Cuyahoga Landmark, Inc
21081 Westwood Drive
Strongsville, Ohio

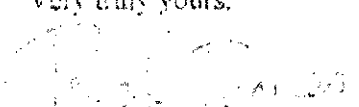
Dear Mr. Gencke:

This letter is in follow-up to my telephone call to you on January 8, 2009 asking for the status of the investigation into the cause and origin of the fire at the location above. I have not received a return telephone call.

Six weeks have now passed since the fire at your client's property and it is imperative that a final investigation into cause and origin be conducted as soon as possible due to the risk of spoliation of the scene. Columbia Gas is, in particular, concerned about the riser that remains in the ground. Your client risks a spoliation claim by delaying the investigation at their property. You may contact me or have your expert, Mr. Churchwell, contact Steve Erlenbach from SFA to schedule the investigation.

I look forward to hearing from you soon.


Very truly yours,


Tracy L. Turner

cc: Peter Mitten, Travelers

5058951

Clarksburg, WV • Charleston, WV • Morgantown, WV • Martinsburg, WV • Wheeling, WV
Huntington, WV • Columbus, OH

 TERRALEX



Peter Mitten

Recovery Claim Representative
Travelers Insurance
National Property Recovery Center
P.O. Box 2954
Milwaukee, WI 53201-2954

(800) 624-6007 ext 4745
(866) 260-7367 (fax)

Steptoe & Johnson
Attn: Tracy Turner
41 South High St
Columbus, OH 43215

September 15, 2009

Re: Travelers subrogation claim
Our claim number: A7M4662
Our insured: O.A.P.S.P.P. LLC
Your client: Columbia Gas
Date of loss: 11/27/2008

Ms. Turner:

We are the insurer for O.A.P.S.P.P. LLC who sustained fire damage on the above captioned date. Our investigation reveals that your insured is responsible for this loss. We are seeking reimbursement for the amount of our legally recoverable damages.

On 11/27/2009, our insured's property was damaged by a fire that occurred due to a gas leak. Columbia Gas owned the gas meter/regulator and failed to adequately maintain the system. As a result of your client's negligence, our insured sustained significant damage to property.

We have issued payment to our insured of \$45,423.00. Enclosed is documentation supporting our claim payment. Please remit the \$45,423.00 payment to Travelers Insurance at the following mailing address:

Travelers Insurance
Subro Property 9048
Hartford, CT 06183-9048

Thank you for your time and consideration. Please contact me at your earliest convenience to discuss an equitable settlement of this matter.

Sincerely, <

Peter Mitten
Recovery Claim Representative
THE CHARTER OAK FIRE INSURANCE COMPANY
pmitten@travelers.com



Huntington Center, Suite 2200
41 South High Street
Columbus, OH 43215
(614) 221-5100 • (614) 221-2052 Fax
www.step-toe-johnson.com

Writer's Contact Information

(614) 458-9793
tracy.turner@step-toe-johnson.com

November 23, 2009

Via Facsimile and Regular Mail

William E. Gericke
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103-3508

Re: Cuyahoga Landmark, Inc
21081 Westwood Drive
Strongsville, Ohio

Dear Mr. Gericke:

We obtained information that the equipment originally preserved from this incident has been destroyed. If the equipment has been destroyed, please provide written confirmation. If the equipment has not been destroyed, then we request that you release the information to us so that we can conduct cause and origin testing. We will coordinate any such testing with you.

I look forward to hearing from you soon.

Very truly yours,


Tracy L. Turner

cc: Peter Mitten, Travelers

5058951

Clarksburg, WV • Charleston, WV • Morgantown, WV • Martinsburg, WV • Wheeling, WV
Huntington, WV • Columbus, OH

 TERRALEX

Tracy Turner
<Tracy.Turner@Staptoe-
Johnson.com>

To "CMcCreery@nisource.com"
<CMcCreery@nisource.com>

cc

01/13/2009 03:23 PM

Subject RE: Strongsville Incident Investigation

Chuck,

Steve Erlenbach heard from Jim Churchwell, an expert retained by Cohen & Giffen, that they just retained a mechanical engineer. Churchwell is arranging to meet this guy at the site within a week, and then plans to have the protocol prepared and a date for the investigation within a week after that. So, we are looking at 1 more week. That seems like a long time still, but I wanted to check with you to see if you want me to push the issue with the attorney to try to get it done quicker.

Thanks,

Tracy L. Turner
614.468.9793 (office)
614.607.3950 (cell)

Lisa Lantagne
<Lisa.Lantagne@Steptoe-Johnson.com>

01/13/2009 04:17 PM

To "cmccreery@nsource.com"
<cmccreery@nsource.com>, "kwren-
denesuk@nsource.com" <kwren-
denesuk@nsource.com>, "jedrice@nsource.com"
<jedrice@nsource.com>
cc Jim Berendsen <Jim.Berendsen@steptoe-
johnson.com>, Tracy Turner
<Tracy.Turner@Steptoe-Johnson.com>
Subject: Cuyahoga Landmark

Attached please find correspondence from Tracy Turner to William E. Gericke at Cozen O'Connor regarding the fire at 21081 Westwood Drive, Strongsville, Ohio. If you should have any questions or concerns, please contact Ms. Turner at (614) 458-9793 or tracy.turner@steptoe-johnson.com. Thank you.

Lisa M. Lantagne
Legal Secretary to Tracy L. Turner
Steptoe & Johnson PLLC
Columbus, Ohio
(614) 458-9829

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Steptoe & Johnson PLLC



1.13.09 letter to Gericke_0113200916041900.pdf

Tracy Turner
<Tracy.Turner@Stepoe-
Johnson.com>

01/20/2009 12:12 PM

To "CMcCreery@nisource.com"
<CMcCreery@nisource.com>,
"serienbach@sealimited.com"
<serienbach@sealimited.com>

cc

Subject: RE: Strongsville Incident Investigation

Chuck,

We heard from counsel for the property owner and are in the process of scheduling a time for the investigation. We will contact Hollinger as soon as that is confirmed.

Thanks,

Tracy L. Turner
614.833.8992 office
614.833.8991 cell

"Erlenbach, Stephen"
<serlenbach@sealimited.com>

To "Tracy Turner" <Tracy.Turner@Stephoe-Johnson.com>, <CMcCreery@nisource.com>

cc

02/06/2009 01:35 PM

Subject: Strongsville, Ohio Fire - Cuyahoga Landmark (Pet Paws)

I finally heard back from plaintiff's expert today - the date for the followup site examination and excavation in Strongsville, OH will be Wednesday February 25th. I will notify PUCO and also the Columbia Gas local personnel in Cleveland.

Stephen E. Erlenbach, P.E., C.F.E.I.
Mechanical Engineer

S-E-A

Tel: 800.782.6851 x. 357

Fax: 614.885.8014

www.SEAlimited.com

Tracy Turner
<Tracy.Turner@Staptoe-
Johnson.com>

02/20/2009 09:42 AM

To: "CMcCreery@nsource.com"
<CMcCreery@nsource.com>, "Calabrese, Cindy"
<Cindy.Calabrese@esis.com>

cc

Subject: RE: Pet Paws - Claim #5212491006832-1

They scheduled the site inspection for Wednesday, February 18th. It took a long time to get scheduled because of the expert for Cuyahoga Township.

Thanks,

Tracy L. Turner
614.458.8793 (office)
614.607.3260 (cell)

-----Original Message-----

From: CMcCreery@nsource.com mailto:CMcCreery@nsource.com
Sent: Friday, February 13, 2009 9:38 AM
To: Calabrese, Cindy
Cc: Tracy Turner
Subject: Re: Pet Paws - Claim #5212491006832-1

I just asked Steve Eriksen for an update--I think Tracey Turner has this one in Jim's absence

Chuck McCreery
314.387-2364 (direct dial)
304.387-3266 (fax)

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"Calabrese,
Cindy"
<Cindy.Calabrese@

To:

esis.com>

<CMcCreery@nsource.com>, "Jim
Berendsen"

02/20/2009 09:45

<Jim.Berendsen@staptoe-

johnson.com>

cc

cc

Subject

Pet Paws - Claim #5212491006832-

1

Chuck and/or Jim,

Is there anything new on the Pet Paws/Oyaboga Landmark, Inc. fire?

Location: 10001 Westwood Road, Birmingham, AL.

Thank you.

Cindy Calabrese
N.Source/SSIS Claims Representative
Merrillville, Indiana

Cell-Cell-1432 - please or 303-858-1976, ext. 3
New Fax #: 408-820-8308
cindy.calabrese@ssis.com

Please consider the environment before printing this e-mail.

Please send all future correspondence to our searching center at SSIS
N.Source API, P.O. Box 31084, Tampa, FL 33631-3084. Please include
the
claim number on all correspondence.

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"Erlenbach, Stephen"
<serlenbach@sealimited.com>

To: <CMcCreery@nsource.com>

cc

07/29/2009 09:36 AM

Subject: RE: Strongsville Incident Review

The insurance company for the building (Nationwide Insurance - represented by Peter O'Connor) has not yet indicated whether or not they are going to pursue any additional examination of the separated fitting. At the time of the site examination, one of their experts (Scott Davis - BIE Engineering) indicated to me that since the line was customer owned, he didn't see how they could fault Columbus for the loss. Their experts retained possession of the separated fitting.

Stephen E. Erlenbach, S.E., C.E.P.E.

Mechanical Engineer

S.E.A.

Tel: 800.782.6881 x. 257

Fax: 800.601.6010

www.SEAlimited.com

Shannon Todd
<Shannon.Todd@Step-
toe-Johnson.com>

09/21/2009 01:39 PM

To "CMcCreery@nisource.com"
<CMcCreery@nisource.com>, "kwren-
denesuk@nisource.com" <kwren-
denesuk@nisource.com>, "jrice@nisource.com"
<jrice@nisource.com>, "Calabrese, Cindy"
<Cindy.Calabrese@esis.com>,
"dtaylorpitman@nisource.com"
<dtaylorpitman@nisource.com>, "jpreast@nisource.com"
<jpreast@nisource.com>
cc Tracy Turner <Tracy.Turner@Step-toe-Johnson.com>
Subject Cuyahoga Landmark dba Pet Paws (2009-0011; Claim
No. 5212491006832-1)

Good afternoon,

Attached is a letter from Travelers concerning this loss dated 11-27-08 in Strongsville, Ohio. They are seeking reimbursement in the amount of \$45,423.06 on behalf of their insured O.A.P.S.P. LLC. We received this late last week, but Tracy hasn't been in the office since it was received. Tracy will be in the office tomorrow and she will be sending you an email on this then.

Thank you

Shannon K. Todd, ACP
Advanced Certified Paralegal - Discovery
Step-toe & Johnson PLLC
Huntington Center, Suite 2200
41 South High Street, Columbus, OH 43215
O: 614-458-9794 F: 614-221-0952

shannon.todd@step-toe-johnson.com
<http://Step-toe-Johnson.com>

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Step-toe & Johnson PLLC

"Erlenbach, Stephen"
<serienbach@sealimited.com>

To: <CMcCreery@nsource.com>

cc

11/20/2009 11:59 AM

Subject: RE: Pet Paws Incident, Strongsville Oh.

I spoke with their engineer, BDA Engineering, in Pittsburgh, and they have no record of ever having the evidence. I then talked with Churchwell Fire Consultants. Their O&C investigator was Jim Churchwell. Jim wasn't in the office, but I talked with his secretary. She got into the database and their records show that they received confirmation from their client (Cohen O Connor) to dispose of the evidence.

The correct information for Churchwell is:

Churchwell
Churchwell Fire Consultants
444 East Nine Mile Road
Hudson, Ohio 44136-1121
Phone 330-341-3900
Fax 330-342-3676

The subrogation attorney for the building (Guyanoga Landmark) on this case was:

William Geracke
Cohen O'Connor
1400 Market Street
Philadelphia, PA 19103
Phone 215-643-1146
Fax 215-643-1146

It appears that Mr. Geracke may have authorized Churchwell to dispose of the evidence. It still wouldn't hurt to send a letter - just because they were given authorization to dispose of it, doesn't mean that they have actually done it.

Stephen E. Erlenbach, P.E., C.S.E.I.

Mechanical Engineer

S.E.I.
Tel: 206.782.6861 x. 357
Fax: 614.885.8014
www.SEALimited.com

-----Original Message-----

From: CMcCreery@nsource.com (mailto:CMcCreery@nsource.com)
Sent: Friday, November 20, 2009 11:52 AM
To: Erlenbach, Stephen
Subject: RE: Pet Paws Incident, Strongsville Oh.

any idea on this? thanks

Chuck McCreary
(304) 387-1334 (direct dial)
(304) 387-3100 (fax)

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Lisa Lantagne
<Lisa.Lantagne@Step-
toe-Johnson.com>

01/13/2009 04:17 PM

To: "cmccreery@nsource.com"
<cmccreery@nsource.com>, "kwren-
denesuk@nsource.com" <kwren-
denesuk@nsource.com>, "jedrice@nsource.com"
<jedrice@nsource.com>
cc: Jim Berendsen <Jim.Berendsen@step-
toe-johnson.com>, Tracy Turner <Tracy.Turner@Step-
toe-Johnson.com>

Subject: Cuyahoga Landmark

Attached please find correspondence from Tracy Turner to William E. Gericke at Cozen
O'Connor regarding the fire at 21081 Westwood Drive, Strongsville, Ohio. If you should have
any questions or concerns, please contact Ms. Turner at (614) 458-9793 or
tracy.turner@step-toe-johnson.com. Thank you.

Lisa M. Lantagne
Legal Secretary to Tracy L. Turner
Step-toe & Johnson PLLC
Columbus, Ohio
(614) 458-9829

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matter addressed in this communication.

Step-toe & Johnson PLLC

1.13.09 letter to Gericke_0113200918041900.pdf

Sandra Schlupe
<Sandra.Schlupe@Step-
toe-Johnson.com>

11/23/2009 04:01 PM

To: "CMcCreary@nsource.com"
<CMcCreary@nsource.com>, "kwren-
denesuk@nsource.com" <kwren-
denesuk@nsource.com>, "jrice@nsource.com"
<jrice@nsource.com>, "cindy.calabrese@esis.com"
<cindy.calabrese@esis.com>,
"dtaylorpitman@nsource.com"
<dtaylorpitman@nsource.com>,
"jpreast@nsource.com" <jpreast@nsource.com>
cc: Tracy Turner <Tracy.Turner@Step-
toe-Johnson.com>
Subject: Cuyahoga Landmark dba Pet Paws (2009-0011;
Claim No. 5212491006832-1)

The attached letter to William Gericke was sent out today. Thank you.

Sandra Schlupe
Legal Secretary to Tracy L. Turner, Esq.
Stepoe & Johnson PLLC
Huntington Center, Suite 2200
41 South High Street, Columbus, OH 43215
O: 614-458-9829 F: 614-221-0952 C:

Sandra.Schlupe@Stepoe-Johnson.com
www.stepoe-johnson.com

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Stepoe & Johnson PLLC

"Erlenbach, Stephen"

<serienbach@sealimited.com>

To: <CMcCreery@nsource.com>

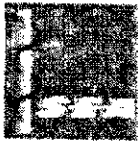
cc:

01/19/2010 01:30 PM

Subject: RE: Pet Paws Incident, Strongsville Oh.

Jim Churchwell wasn't in, but I talked to his secretary. She went and looked at the file and it appears that they were given an authorization to destroy the evidence on 9/10/09. The tags for the evidence were in the file, which means that the evidence was indeed discarded.

Stephen E. Erlenbach, P.E., C.F.E.I.
Mechanical Engineer



301.781.0661 x307
301.781.0661 x307
614.362.0174 fax SEALimited.com

TURNING CHALLENGES INTO OPPORTUNITIES SINCE 1970

Effective Date: 05/01/2007	Investigation of Failures	Plan Number: OMP 1652
Supersedes: N/A		Page 1 of 2

REFERENCE 49 CFR Part 192.617

1. GENERAL

This procedure establishes a method for analyzing accidents and failures associated with an in-service **pipeline**, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, and for determining the cause of the accident or failure and minimizing the possibility of a recurrence.

For the purpose of this procedure the following definitions apply.

- a. "Failures" are ordinarily deficiencies in material design, construction, operation and maintenance on or to in-service pipelines.
- b. "Accidents" are unexpected and undesirable events occurring on or to in-service pipelines.

2. INVESTIGATION OF FAILURES AND ACCIDENTS

The level of investigation of a failure or accident will depend upon the situation. A failure or accident resulting in or involved with a DOT reportable **incident** shall require a detailed investigation. Investigation of a failure or accident not associated with a DOT reportable **incident** shall be at a sufficient level to determine the cause.

2.1 DOT Reportable Incidents

As soon as the incident site has been made safe, rapid response will be necessary for preserving the integrity of specimens and gathering information pertinent to the investigation. If the cause of the accident or failure is not readily identifiable, the Company should take care to maintain the incident site in as undisturbed a condition as possible until further investigation may be undertaken.

The Company should take the following actions in conducting a field investigation as to the cause of the failure or accident.

- a. Obtain or develop a list of the personnel, equipment, and witnesses involved in the event.
- b. Obtain or develop a chronological list of events.
- c. Take photographs of site and/or equipment.
- d. Preserve evidence.

Effective Date: 05/01/2007	Investigation of Failures	Plan Number: OMP 1652
Supersedes: N/A		Page 2 of 2

- e. Determine if tests are needed and whether laboratory analysis or outside consultants are warranted to determine the cause of failure. Refer to Section 3 for guidance on testing of specimens.

Once the investigation is completed the Company should determine the cause of the failure or accident. The need for continuing surveillance of pipeline facilities should also be determined.

The cause of the failure or accident shall be used to meet the reporting requirements detailed in OMP 1020 "Incident and Safety-Related Condition Reporting".

2.2 Other Failures and Accidents

Investigation of a failure or accident not associated with a DOT reportable **incident** should be at a sufficient level to determine the cause.

3. TESTING SPECIMENS

Testing of the specimen should be considered when:

- a. Questions exist as to the cause (why) of failure.
- b. Questions exist as to the method (how) of failure.
- c. The failure resulted in a DOT reportable **incident**.
- d. Litigation is likely.

The testing methods used should be suited to the particular material being tested and be pertinent to the failure investigation.



Energy Distribution Group

Columbia Gas Companies

COMPANY POLICY AND PROCEDURE MANUAL

SPONSOR NAME (DEPARTMENT)		POLICY/PROCEDURE REFERENCE NO. -	555-1
Engineering - Engineering Services		GENERAL SUBJECT:	Administrative Operations
DATE ISSUED	EFFECTIVE DATE	SUBSIDIARY SUBJECT:	Material Engineering
September 25, 1995	September 25, 1995		
STATUS (NEW, REVISED OR CANCELLED)			
Revised			
TITLE			
Investigation of Failures			
PURPOSE			
To establish a method for analyzing failures to determine the causes and to minimize the possibility of a recurrence.			
CROSS REFERENCE			
Code of Federal Regulations - Title 49 - Part 192 - Subpart L - Section 192.617			
<u>Table of Contents</u>			<u>Page</u>
1. Definition.....			1
2. General.....			2
3. Reporting Criteria.....			2
4. Reporting and Routing.....			3
5. Responsibility			3
5.1 Material Standards and Testing Manager			3
5.2 Investigator.....			4
6. Metallurgical and/or Other Type Examination.....			4
6.1 In-Service Failures			4
6.2 Other Considerations.....			5
7. Reimbursement.....			5
8. Facility Failure Reports			5
9. Computer Data Search.....			6
1. Definition			
For the purpose of this procedure "failures" are ordinarily deficiencies in material design, construction, operation and maintenance.			
THIS PROCEDURE ISSUED PER CORPORATE POLICY STATEMENT 600 WITH APPROVALS ON FILE			

2. General

This procedure establishes a method for analyzing failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

Form C 1827, "Failure Report," Exhibit A, shall be submitted for failures on:

- a. Components that are part of an in-service pipeline facility.
- b. Materials identified as being defective prior to being placed in service, such as in the warehouse, during installation, or during testing.
- c. Defective vehicles, equipment, tools and instruments.

Reporting material problems other than failures, such as poor delivery, vendor performance, poor/deteriorating material shall be reported in accordance with Policy and Procedure Reference No. 1082-6, "Reporting Material/Vendor Performance."

3. Reporting Criteria

Failures found during operations, such as leak repairs, regulator maintenance, valve inspection, etc., may have a Failure Report submitted in addition to any other reporting requirements.

Failure Reports may be required as part of the investigation of:

<u>Policy and Procedure Reference No.</u>	<u>Title</u>
525-2	Reportable Incidents
525-3	Damage to Company Pipeline Facilities
525-4	Employee Injury/Illness Notification and Reporting
525-5	Public Injuries/Property Damage Notification/Reporting

A Failure Report shall be prepared and submitted for each of the following in-service failures:

- a. Leaks cleared under Leak Cause Codes 5 and 6, ("Construction Defect" and "Material Failure") on Form C 1596, "Distribution Plant Inspection and Leakage Repair." Refer to Policy and Procedure Reference No. 651-7, "Leakage Control Records and Reports."
- b. Cracks in welds.
- c. Defective fusion joints.

- d. Cracks in the body or components of steel, plastic or cast iron pipe.

4. Reporting and Routing

Form C 1827, "Failure Report," Exhibit A, shall be initiated at the work location experiencing the failure. The person preparing the Failure Report should write a narrative description of the failure stating what happened, how the failure was discovered and what action, if any, was taken to correct it. The report shall contain pertinent facts about the failure. When known, refer to similar in-service failures that occurred in the immediate geographic area.

The Failure Report and additional information (drawings, pictures, etc.), when appropriate, shall be forwarded to the District Operations Manager (or equivalent) for review. When it has been determined that a facility failure resulted in or is involved with personal injury, significant property damage to others, or a reportable incident the Law Department shall be contacted for guidance for conducting the investigation, reporting the failure and retaining the material involved.

The failed item shall be retained at the report location, unless otherwise advised. The item shall be tagged with the Failure Report number and date of failure. Failed items may be disposed of after six (6) months unless otherwise notified.

It is permissible to include multiple failures on one Failure Report. However, all failures, regardless of frequency or prior reports, shall be reported.

The Failure Report shall be numbered by using a three part number as follows:

- a. Area Location Number in which incident occurred.
- b. Last two digits of occurrence year.
- c. Consecutive number starting with 001 each January 1st.

The District Operations Manager (or equivalent) shall forward the original and two copies (pink and blue) of the Failure Report and appropriate attachments to Engineering - Manager of Material Standards and Testing. The District Control Copy (yellow copy) shall be retained until informed of the completion of the investigation.

5. Responsibility

5.1 Material Standards and Testing Manager

The Manager of Material Standards and Testing is responsible for:

- a. Assigning an investigator and noting the investigator's name on the Failure Report.
- b. Entering the Failure Report into the computer system.

- c. Forwarding the Failure Report to the investigator.
- d. Issuing quarterly reminder notices to assigned investigators of failures that have not been reported as completed.

5.2 Investigator

The investigator will:

- a. Contact the field for defective material, when needed.
- b. Solicit the service of others, when needed.
- c. Consult with the Manager of Material Standards and Testing to determine whether a metallurgical and/or other type examination is appropriate. See Section 7.
- d. Distribute, when the investigation is completed, the components of Form C 1827 "Failure Report," with comments on actions taken as follows:
 - (1) White copy to the Manager of Material Standards and Testing.
 - (2) Blue copy to Accounting, Tax and Risk Management - Materials Management for reimbursement when appropriate. See Section 7.
 - (3) Pink copy to the District.

For in-service failures, the District will file the pink copy in the appropriate District main history file.

6. Metallurgical and/or Other Type Examination

The Manager of Material Standards and Testing shall determine, after consultation with the investigator and/or the District Operations Manager (or equivalent), if a metallurgical and/or other type examination is appropriate.

6.1 In-Service Failures

The following types of in-service failures shall be considered for removal and metallurgical and/or other type examination, on a random sampling basis:

- a. Repeat of similar material failure or construction defect type leaks occurring in the same general area or same year of construction.

- b. Cracked welds. (In accordance with Policy and Procedure Reference No. 651-6, "Leakage Repair Methods," all cracked welds shall be cut out.)
- c. Crack(s) in the body of pipe or fittings.
- d. Graphitization or cracking of cast-iron pipe.
- e. Manufacturing defect in a pipeline component.

6.2 Other Considerations

Metallurgical and/or other type examination shall be considered when:

- a. Questions exist as to the cause (why) of failure.
- b. Questions exist as to the method (how) of failure.
- c. The failure caused a reportable incident in accordance with Policy and Procedure Reference No. 525-2, "Reportable Incidents."
- d. Litigation is likely.

7. Reimbursement

To obtain appropriate credit, the blue copy shall be sent to Accounting, Tax and Risk Management - Materials Management by the investigator.

8. Facility Failure Reports

The Material Standards and Testing Section shall prepare:

- a. Quarterly, a listing entitled "Summary of Failure Reports." Exhibit B for Failure Reports received and assigned.
- b. Periodically, a summary by type material and failure by location.
- c. As needed, specialized narrative or computer summary reports on frequently failed items. The reports for the items will contain, as applicable, innovative solutions, updates of any ongoing investigations or conclusion(s) of the investigations, any actions taken or to be taken and other items of general interest.

Distribution of the various reports will be to the Company Presidents, Materials Management Director, District Operations Managers, Manager of Risk Management and Engineering Department Directors.

9. Computer Data Search

Computer searches of failure report data can be made by using the "Facility/Equipment Failure Data Base and Reporting System." To access this CMS program, enter the system identification "CDC 2017" and Read Password of "Readit" to search the data. Search procedures are explained in User Document No. 2017.

District users are not permitted to alter or enter data.

COLUMBIA GAS		DISTRIBUTOR COMPANIES		FAILURE REPORT	
REPORT NUMBER	DATE RECEIVED	DATE REPORTED	INTERNAL FIELD NO.	DATE OF FAILURE	LOCATION OF FAILURE
Failure Mode: _____		Failure Mode: _____		Failure Mode: _____	
Service Plant: _____		Service Plant: _____		Service Plant: _____	
Results: _____		Results: _____		Results: _____	
Detected by: _____		Where found: _____		Cause: _____	
1. package survey		1. warehouse		1. design	
2. other inspection		2. installation		2. design	
3. customer		3. under test		3. corrosion	
4. pressure gauge		4. in service		4. collision	
5. other		5. unknown		5. human error	
6. other		6. other		6. other	
7. other		7. other		7. other	
8. other		8. other		8. other	
9. other		9. other		9. other	
10. other		10. other		10. other	
11. other		11. other		11. other	
12. other		12. other		12. other	
13. other		13. other		13. other	
14. other		14. other		14. other	
15. other		15. other		15. other	
16. other		16. other		16. other	
17. other		17. other		17. other	
18. other		18. other		18. other	
19. other		19. other		19. other	
20. other		20. other		20. other	
21. other		21. other		21. other	
22. other		22. other		22. other	
23. other		23. other		23. other	
24. other		24. other		24. other	
25. other		25. other		25. other	
26. other		26. other		26. other	
27. other		27. other		27. other	
28. other		28. other		28. other	
29. other		29. other		29. other	
30. other		30. other		30. other	
31. other		31. other		31. other	
32. other		32. other		32. other	
33. other		33. other		33. other	
34. other		34. other		34. other	
35. other		35. other		35. other	
36. other		36. other		36. other	
37. other		37. other		37. other	
38. other		38. other		38. other	
39. other		39. other		39. other	
40. other		40. other		40. other	
41. other		41. other		41. other	
42. other		42. other		42. other	
43. other		43. other		43. other	
44. other		44. other		44. other	
45. other		45. other		45. other	
46. other		46. other		46. other	
47. other		47. other		47. other	
48. other		48. other		48. other	
49. other		49. other		49. other	
50. other		50. other		50. other	
51. other		51. other		51. other	
52. other		52. other		52. other	
53. other		53. other		53. other	
54. other		54. other		54. other	
55. other		55. other		55. other	
56. other		56. other		56. other	
57. other		57. other		57. other	
58. other		58. other		58. other	
59. other		59. other		59. other	
60. other		60. other		60. other	
61. other		61. other		61. other	
62. other		62. other		62. other	
63. other		63. other		63. other	
64. other		64. other		64. other	
65. other		65. other		65. other	
66. other		66. other		66. other	
67. other		67. other		67. other	
68. other		68. other		68. other	
69. other		69. other		69. other	
70. other		70. other		70. other	
71. other		71. other		71. other	
72. other		72. other		72. other	
73. other		73. other		73. other	
74. other		74. other		74. other	
75. other		75. other		75. other	
76. other		76. other		76. other	
77. other		77. other		77. other	
78. other		78. other		78. other	
79. other		79. other		79. other	
80. other		80. other		80. other	
81. other		81. other		81. other	
82. other		82. other		82. other	
83. other		83. other		83. other	
84. other		84. other		84. other	
85. other		85. other		85. other	
86. other		86. other		86. other	
87. other		87. other		87. other	
88. other		88. other		88. other	
89. other		89. other		89. other	
90. other		90. other		90. other	
91. other		91. other		91. other	
92. other		92. other		92. other	
93. other		93. other		93. other	
94. other		94. other		94. other	
95. other		95. other		95. other	
96. other		96. other		96. other	
97. other		97. other		97. other	
98. other		98. other		98. other	
99. other		99. other		99. other	
100. other		100. other		100. other	

Codes for Products Type (PR)

- | | |
|---|---|
| <p>A. Regulators</p> <ol style="list-style-type: none"> 1. Regulators Under 2" 2. Regulators 2" and Over
Self-Operated 3. Regulators 2" and Over
Instrument Control 4. Regulators 2" and Over
Auto-Operated <p>B. Meters</p> <ol style="list-style-type: none"> 1. Domestic 2. Large Volume Displacement 3. Large Volume Turbine 4. Large Volume Rotary <p>C. Regulation Meter Auxiliary Equipment</p> <ol style="list-style-type: none"> 1. Pressure Gauges—Recording (Chart Drives) 2. Pressure Gauges non-Recording 3. Controllers 4. Meters 5. Domestic Meter Settings 6. Remote Indexes-Readers 7. Service Risers 8. Other <p>D. Orifices</p> <ol style="list-style-type: none"> 1. Orifice Equipment <p>E. Pipes</p> <ol style="list-style-type: none"> 1. Plastic 2. Steel 3. Cast Iron <p>F. Mechanical Joining Fittings</p> <ol style="list-style-type: none"> 1. Boltless Mechanical Fitting
(Compression) Metallic 2. Boltless Mechanical Fitting
(Compression) Plastic 3. Bolted Couplings 4. Push-locks 5. Self-Lock 6. Locking <p>G. Other Fittings</p> <ol style="list-style-type: none"> 1. Plastic Fusion Socket 2. Plastic Fusion Butt 3. Plastic Fusion Electrofusion 4. Transition Fittings 5. Steel Weld Fittings 6. Flanges 7. Line Stopping Fittings 8. Threaded Fittings | <p>H. Valves</p> <ol style="list-style-type: none"> 1. Man-Plastic 2. Man-Metallic 3. Core Valve-Plastic 4. Core Valve-Metallic 5. Water Valve 6. Excess Flow Valve <p>I. Tapping Tees</p> <ol style="list-style-type: none"> 1. Mechanical Pipe-Metallic 2. Mechanical Base-Plastic 3. Steel Weld Base 4. Plastic Fusion Base <p>J. Repair Fittings</p> <ol style="list-style-type: none"> 1. Leak Repair Clamp-Mild Steel 2. Leak Repair Clamp-Stainless 3. Joint Repair-Mechanical 4. Joint Repair Non-Mechanical
(Non Seal, etc.) <p>K. Corrosion Control</p> <ol style="list-style-type: none"> 1. Coatings 2. Tapes/Mastics 3. Anodes 4. Rectifiers 5. Insulating Kits-Fittings <p>L. Tools</p> <ol style="list-style-type: none"> 1. Hand Tools 2. Power Hand Tools 3. Pneumatic/Hydraulic Tools 4. Water Pumps 5. Portable Generators 6. Instruments 7. Tapping and Plugging Equipment 8. Drilling Devices (Cutters, Core Saws) 9. Miscellaneous <p>M. Safety Equipment</p> <ol style="list-style-type: none"> 1. Personal Protection Equipment 2. Fire Extinguishers 3. Other <p>N. Water Transport Equipment</p> <ol style="list-style-type: none"> 1. Vehicles 2. Buckbores 3. Trailers 4. Trenchers 5. Air Compressors 6. Auxiliary Equipment <p>O. Other</p> <ol style="list-style-type: none"> 1. Other |
|---|---|

Summary of Patient Records
Under Review

Case No.	Birth Date	Referral Date	Referral Source	Referral Description	Investigation	Investigation Results
1001	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1002	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1003	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1004	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1005	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1006	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1007	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1008	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1009	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1010	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1011	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1012	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1013	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1014	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1015	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1016	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1017	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1018	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1019	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1020	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up
1021	01/01/1945	10/10/1945	Physician	Reg. would not take up	01/01/1945	Reg. would not take up

FOR THE INFORMATION OF THE DISTRICT OFFICE

Appendix F
Staff Pipeline Failure Investigation Report
February 16, 2010



The Public Utilities
Commission of Ohio

Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
180 East Broad Street, 7th Floor
Columbus, OH 43215

Pipeline Failure Investigation Report

☒ Reportable Non-Reportable

Pipeline System:	34060017	Operator:	Columbia Gas of Ohio
Location:	21081 Westwood Drive	Date of Occurrence:	11/27/08
Medium Released:	Natural Gas	Quantity:	N/A
PHMSA Arrival Time & Date:	11:00 - 12/1/08	Total Damages \$	100,000
Investigation Responsibility:	<input checked="" type="checkbox"/> State <input type="checkbox"/> PHMSA <input type="checkbox"/> NTSB Other		
Company Reported Apparent Cause:	<input type="checkbox"/> Corrosion <input type="checkbox"/> Excavation		
<input type="checkbox"/> Natural Forces	<input type="checkbox"/> Incorrect Operation <input type="checkbox"/> Other Outside Force Damage		
<input type="checkbox"/> Material and/or Welds	<input type="checkbox"/> Equipment and Operations <input checked="" type="checkbox"/> Other Mechanical Coupling Pullout		
Rupture	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Leak	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Fire	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Explosion	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Evacuation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Number of Persons	0
		Area	0

Narrative Summary

Short summary of the Incident/Accident which will give interested persons sufficient information to make them aware of the basic scenario and facts.

At approximately 2:30 pm on Thursday November 28, 2008 a report was made to the Strongsville Fire Department regarding an odor of gas near the intersection of Prospect and Westwood Drive. At approximately 3:24 pm, while the Strongsville Fire Department was investigating the odor complaint, the building at 21081 Westwood caught fire. The Strongsville Fire Department then notified Columbia Gas. A COH Service Technician was onsite within 10 minutes and called for a plant crew to dig-up the curb valve to shut off gas service to the building.

The building was a pet care business and was boarding dogs and cats. All of which survived. However, the building sustained severe fire damage.

After the fire was extinguished, COH attempted to perform a pressure test of the service line which did not hold. It is believed the leak is coming from or near the riser. The service is a 1" plastic service which was inserted in 1978. The riser is a 1" cathodically protected pre-bent coated steel riser.

On February 25, 2009, the riser was excavated by COH along with the Cause and Origin experts for COH and the other interested parties. Upon excavation, it was discovered the 1" plastic service had separated (pulled-out) from a 1" mechanical coupling (ell) connecting the plastic service to the steel riser. The riser was taken in to possession by the insurance company representing the buildings owner. It will be further examined in a laboratory at a future date.

On December 1, 2009, a non-compliance was sent to COH under 192.617 for "Gas Pipeline Safety Section Staff observed pipe that had a failed mechanical compression coupling near the end of the riser. Columbia Gas has not provided information that this coupling has been tested for the purpose of determining the cause of the failure."

On January 6, 2010 COH responded to the a non-compliance. "Columbia contacted the property owner's representatives to request that a failure analysis be conducted on the materials from the above referenced incident. Columbia was prepared to take possession of the materials and have the failure analysis if the property owner's representatives were not planning to proceeding with the analysis. Columbia was informed that the property owner's representatives had authorized the disposal of the materials from the above referenced incident.

Columbia's attorneys have requested confirmation that the materials related to the above referenced incident have been discarded. At this time Columbia has not received a response from the property owners' representatives."

Region/State Central/Ohio	Reviewed by: Peter Chace	
Principal Investigator: Paul W. Hollinger & Tyler E. Ford	Title: GPS investigator	
Date: 2/10/10	Date:	

Failure Location & Response

Location (City, Township, Range, County/Parish): Strongsville, Strongsville Twp, Cuyahoga County		(Acquire Map)
Address or M.P. on Pipeline: 21081 Westwood Drive	(1) Type of Area (Rural, City): City	(1)
Date: 11/27/09	Time of Failure: 15:33 - Strongsville PD Report	
Time Detected: 15:34 - COH Notified	Time Located: 15:43 - COH onsite	
How Located: Fire around meter - Made safe/gas off at 16:55		
NRC Report #: 891161 (Attach Report)	Time Reported to NRC: 18:45 - 1/27/08	Reported by: Scott Baker
Type of Pipeline:		
Gas Distribution <input type="checkbox"/> LP <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> Public Utility <input type="checkbox"/> Master Meter	Gas Transmission <input type="checkbox"/> Interstate Gas <input type="checkbox"/> Intrastate Gas <input type="checkbox"/> Jurisdictional Gas Gathering <input type="checkbox"/> Offshore Gas <input type="checkbox"/> Offshore Gas - High H ₂ S	Hazardous Liquid <input type="checkbox"/> Interstate Liquid <input type="checkbox"/> Intrastate Liquid <input type="checkbox"/> Offshore Liquid <input type="checkbox"/> Jurisdictional Liquid Gathering <input type="checkbox"/> CO ₂
LNG <input type="checkbox"/> LNG Facility		
Pipeline Configuration (Regulator Station, Pump Station, Pipeline, etc.): 4" medium pressure plastic gas main with an MAOP of 60 psi. 1" plastic service line inserted/installed in 1978. System operates at 50 +/- psi.		

Operator/Owner Information

Owner: Columbia Gas of Ohio Address: 200 Civic Center Drive Columbus, Ohio 43215 Company Official: Jack Partridge, President, COH Phone No.: (614) 460-5952 Fax No.: (614) 460-6455	Operator: Columbia Gas of Ohio Address: 200 Civic Center Drive Columbus, Ohio 43215 Company Official: Jack Partridge, President, COH Phone No.: (614) 460-5952 Fax No.: (614) 460-6455
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Drug and Alcohol Testing Program Contacts

☒ N/A

Drug Program Contact & Phone:
Alcohol Program Contact & Phone:

I Photo documentation

Damages

Product/Gas Loss or Spill ⁽²⁾	N/A	Estimated Property Damage \$	100,000 - Fire Dept Est.
Amount Recovered	None	Associated Damages ⁽³⁾ \$	100,000 - Fire Dept Est.
Estimated Amount \$	N/A		

Description of Property Damage:
Complete loss of business and contents

Customers out of Service: ☒ Yes ☐ No Number: 1

Suppliers out of Service: ☐ Yes ☒ No Number: _____

Fatalities and Injuries

Fatalities:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Company: _____	Contractor: _____	Public: _____
Injuries - Hospitalization:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Company: _____	Contractor: _____	Public: _____
Injuries - Non-Hospitalization:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Company: _____	Contractor: _____	Public: _____
Total Injuries (including Non-Hospitalization):		Company: _____	Contractor: _____	Public: _____

Name	Job Function	Yrs w/ Comp.	Yrs. Exp.	Type of Injury
N/A	N/A			

Drug/Alcohol Testing

☒ N/A

Were all employees that could have contributed to the incident, post-accident tested within the 2 hour time frame for alcohol or the 32 hour time frame for all other drugs?

☐ Yes ☐ No

Job Function	Test Date & Time	Location	Results		Type of Drug
			Pos	Neg	
			<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	

² Initial volume lost or spilled

³ Including cleanup cost

System Description

Describe the Operator's System:

4" medium pressure plastic gas main with an MAOP of 60 psi. 1" plastic service line inserted/installed in 1978. System operates at 50 +/- psi.

Pipe Failure Description

☐ N/A

Length of Failure (inches, feet, miles):	Compression ell pulled apart	(1)
Position (Top, Bottom, include position on pipe, 6 o'clock): (1) complete separation	Description of Failure (Corrosion Gouge, Seam Split): (1) Compression ell pulled apart	
Laboratory Analysis:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Performed by:	N/A	
Preservation of Failed Section or Component:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes - Method:	Fitting was disposed of by insurance company representing the building's owner before it was analyzed	
In Custody of:	Fitting was disposed of by insurance company representing building owner before it was analyzed by a laboratory	
Develop a sketch of the area including distances from roads, houses, stress inducing factors, pipe configurations, etc. Bar Hole Test Survey Plot should be outlined with concentrations at test points. Direction of Flow.		

Component Failure Description

☐ N/A

Component Failed:	1" compression ell	(1)
Manufacturer: Unknown	Model: Unknown	
Pressure Rating: N/A	Size: 1"	
Other (Breakout Tank, Underground Storage): n/a		

Pipe Data

☐ N/A

Material: Inserted plastic	Wall Thickness/SDR: NO TEXT LINE ON PIPE
Diameter (O.D.): NO TEXT LINE ON PIPE	Installation Date: NO TEXT LINE ON PIPE
SMYS: NO TEXT LINE ON PIPE	Manufacturer: NO TEXT LINE ON PIPE
Longitudinal Seam: NO TEXT LINE ON PIPE	Type of Coating: NO TEXT LINE ON PIPE
Pipe Specifications (API 5L, ASTM A53, etc.): NO TEXT LINE ON PIPE	

Joining

☐ N/A

Type: Mechanical	Procedure: n/a
NDT Method: n/a	Inspected: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Pressure @ Time of Failure @ Failure Site <input type="checkbox"/> N/A				
Pressure @ Failure Site: 50 psi			Elevation @ Failure Site: 878'	
Pressure Readings @ Various Locations:			Direction from Failure Site	
Location/M.P./Station #	Pressure (psig)	Elevation (ft msl)	Upstream	Downstream
Nearest District regulations station	90	878'	X	

Upstream Pump Station Data <input checked="" type="checkbox"/> N/A	
Type of Product:	API Gravity:
Specific Gravity:	Flow Rate:
Pressure @ Time of Failure ⁽⁴⁾	Distance to Failure Site:
High Pressure Set Point:	Low Pressure Set Point:

Upstream Compressor Station Data <input checked="" type="checkbox"/> N/A	
Specific Gravity:	Flow Rate:
Pressure @ Time of Failure ⁽⁴⁾	Distance to Failure Site:
High Pressure Set Point:	Low Pressure Set Point:

Operating Pressure <input type="checkbox"/> N/A	
Max. Allowable Operating Pressure: 60 psi	Determination of MAOP: Pressure test
Actual Operating Pressure: 50 psi	
Method of Over Pressure Protection: District regulators	
Relief Valve Set Point: 50 psi	Capacity Adequate? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Integrity Test After Failure <input type="checkbox"/> N/A	
Pressure Test Conducted in place? (Conducted on Failed Components or Associated Piping): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If NO, Tested after removal? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Method: Air test on service line before removal	
Describe any failures during the test. Pressure test did not hold	

Soil/water Conditions @ Failure Site <input checked="" type="checkbox"/> N/A	
Condition of and Type of Soil around Failure Site (Color, Wet, Dry, Frost Depth):	
Type of Backfill (Size and Description):	
Type of Water (Salt, Brackish):	Water Analysis ⁽⁵⁾ <input type="checkbox"/> Yes <input type="checkbox"/> No

4 Obtain event logs and pressure recording charts

5 Attach copy of water analysis report

External Pipe or Component Examination		<input type="checkbox"/> N/A
External Corrosion? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	(1)	Coating Condition (Disbonded, Non-existent): Wrapped in cathodic wrap (1)
Description of Corrosion: No corrosion		
Description of Failure Surface (Gouges, Arc Burns, Wrinkle Bends, Cracks, Stress Cracks, Chevrons, Fracture Mode, Point of Origin): Pullout of mechanical ell fitting		
Above Ground: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	(1)	Buried: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (1)
Stress Inducing Factors: Non observed	(1)	Depth of Cover: 26" (1)

Cathodic Protection		<input type="checkbox"/> N/A
P/S (Surface): -0.643		P/S (Interface): -0.643
Soil Resistivity: n/a	pH: n/a	Date of Installation: 1978
Method of Protection: Spike anode on steel riser		
Did the Operator have knowledge of Corrosion before the Incident? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
How Discovered? (Close Interval Survey, Instrumented Pig, Annual Survey, Rectifier Readings, ECDA, etc): T/S reading taken when exposed		

Internal Pipe or Component Examination		<input type="checkbox"/> N/A
Internal Corrosion: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	(1)	Injected Inhibitors: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Type of Inhibitors: N/A		Testing: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Results (Coupon Test, Corrosion Resistance Probe): N/A		
Description of Failure Surface (MIC, Pitting, Wall Thinning, Chevrons, Fracture Mode, Point of Origin): Pullout of a compression ell		
Cleaning Pig Program: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Gas and/or Liquid Analysis: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Results of Gas and/or Liquid Analysis (6) N/A		
Internal Inspection Survey: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Results (7) N/A
Did the Operator have knowledge of Corrosion before the Incident? <input type="checkbox"/> Yes <input type="checkbox"/> No		
How Discovered? (Instrumented Pig, Coupon Testing, ICDA, etc.): Reportable incident from leak		

6 Attach copy of gas and/or liquid analysis report

7 Attach copy of internal inspection survey report

☐ NANA

Failure Isolation		<input type="checkbox"/> N/A
Squeeze Off/Stopple Location and Method: Curb valve manually closed at 16:55 on 11/27/08		
Valve Closed - Upstream: Curb valve Time: 16:55	I.D.: M.P.:	
Valve Closed - Downstream: Time:	I.D.: M.P.:	
Pipeline Shutdown Method: <input checked="" type="checkbox"/> Manual <input type="checkbox"/> Automatic <input type="checkbox"/> SCADA <input type="checkbox"/> Controller <input type="checkbox"/> ESD		
Failed Section Bypassed or Isolated: Isolated		
Performed By: COH Service Tech - Matt Mikulee	Valve Spacing: n/a	

Odorization		<input type="checkbox"/> N/A
Gas Odorized: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Concentration of Odorant (Post Incident at Failure Site):	
Method of Determination: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	% LEL: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	% Gas In Air: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Sniff test with instrument	Time Taken: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Was Odorizer Working Prior to the Incident? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Type of Odorizer (Wick, By-Pass): Mercaptan and local production	
Odorant Manufacturer: N/A Model: n/a	Type of Odorant: Mercaptan and local production gas N/A	
Amount Injected: N/A	Monitoring Interval (Weekly): Monthly throughout district	
Odorization History (Leaks Complaints, Low Odorant Levels, Monitoring Locations, Distances from Failure Site): Last scheduled Odor reading was 0.52% taken on 11/1/08 on Sprague Road - 12/1/08 at 21374 Westwood = 0.12%		

Weather Conditions		<input checked="" type="checkbox"/> N/A
Temperature:	Wind (Direction & Speed):	
Climate (Snow, Rain):	Humidity:	
Was Incident preceded by a rapid weather change? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Weather Conditions Prior to Incident (Cloud Cover, Ceiling Heights, Snow, Rain, Fog):		

Gas Migration Survey <input type="checkbox"/> N/A	
Bar Hole Test of Area: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Equipment Used: HFI and CGI
Method of Survey (Foundations, Curbs, Manholes, Driveways, Mains, Services) ⁽⁹⁾ No leakage found during supplemental leak survey after incident - Last scheduled leakage survey performed on 10/13/08 - No open leaks noted in area.	

Environment Sensitivity Impact <input checked="" type="checkbox"/> N/A	
Location (Nearest Rivers, Body of Water, Marshlands, Wildlife Refuge, City Water Supplies that could be or were affected by the medium loss):	
OPA Contingency Plan Available? <input type="checkbox"/> Yes <input type="checkbox"/> No	Followed? <input type="checkbox"/> Yes <input type="checkbox"/> No

Class Location/High Consequence Area <input type="checkbox"/> N/A	
Class Location: 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 4 <input type="checkbox"/> Determination: <u>Population Density</u>	HCA Area? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A Determination: _____
Odorization Required? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Pressure Test History <input type="checkbox"/> N/A (Expand List as Necessary)						
	Req'd ⁽¹⁰⁾ Assessment Deadline Date	Test Date	Test Medium	Pressure (psig)	Duration (hrs)	% SMYS
Installation	N/A	1978	Air	90	5 min	n/a
Next	12/1/08	12/1/08	Air	Not Hold	n/a	
Next						
Most Recent						
Describe any problems experienced during the pressure tests.						

Internal Line Inspection/Other Assessment History <input checked="" type="checkbox"/> N/A (Expand List as Necessary)					
	Req'd ⁽¹⁰⁾ Assessment Deadline Date	Assessment Date	Type of ILI Tool ⁽¹¹⁾	Other Assessment Method ⁽¹²⁾	Indicated Anomaly If yes, describe below
Initial					<input type="checkbox"/> Yes <input type="checkbox"/> No
Next					<input type="checkbox"/> Yes <input type="checkbox"/> No
Next					<input type="checkbox"/> Yes <input type="checkbox"/> No

⁹ Plot on site description page
¹⁰ As required of Pipeline Integrity Management regulations in 49CFR Parts 192 and 195
¹¹ MFL, geometry, crack, etc.
¹² ECDA, ICDA, SCCDA, "other technology," etc.

Internal Line Inspection/Other Assessment History

☒ N/A

(Expand List as Necessary)

Most Recent

☐ Yes☐ No

Describe any previously indicated anomalies at the failed pipe, and any subsequent pipe inspections (anomaly digs) and remedial actions.

Pre-Failure Conditions and Actions

☒ N/A

Was there a known pre-failure condition requiring ⁽¹⁰⁾ the operator to schedule evaluation and remediation?

☐ Yes (describe below or on attachment)

☐ No

If there was such a known pre-failure condition, had the operator established and adhered to a required ⁽¹⁰⁾ evaluation and remediation schedule? Describe below or on attachment. ☐ Yes ☐ No ☐ N/A

Prior to the failure, had the operator performed the required ⁽¹⁰⁾ actions to address the threats that are now known to be related to the cause of this failure? ☐ Yes ☐ No ☐ N/A

List below or on an attachment such operator-identified threats, and operator actions taken prior to the accident.

Describe any previously indicated anomalies at the failed pipe, and any subsequent pipe inspections (anomaly digs) and remedial actions.

Maps & Records

☐ N/A

Are Maps and Records Current? ⁽¹³⁾

☒ Yes

☐ No

Comments:

Appendix F

Leak Survey History

☐ N/A

Leak Survey History (Trend Analysis, Leak Plots):

No leakage found during supplemental leak survey after incident - Last scheduled leakage survey performed on 10/13/08 - No open leaks noted in area.

Pipeline Operation History

☐ N/A

Description (Repair or Leak Reports, Exposed Pipe Reports):

No open leaks in immediate area

Did a Safety Related Condition Exist Prior to Failure?

☐ Yes

☒ No

Reported?

☐ Yes

☐ No

Unaccounted For Gas: N/A

Over & Short/Line Balance (24 hr., Weekly, Monthly/Trend): N/A

¹³ Obtain copies of maps and records

Operator/Contractor Error ☐ N/A				
Name:		Job Function:		
Title:		Years of Experience:		
Training (Type of Training, Background):				
Was the person "Operator Qualified" as applicable to a precursor abnormal operating condition? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
Was qualified individual suspended from performing covered task <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
Type of Error (Inadvertent Operation of a Valve):				
Procedures that are required:				
Actions that were taken:				
Pre-Job Meeting (Construction, Maintenance, Blow Down, Purging, Isolation):				
Prevention of Accidental Ignition (Tag & Lock Out, Hot Weld Permit):				
Procedures conducted for Accidental Ignition:				
Was a Company Inspector on the Job? <input type="checkbox"/> Yes <input type="checkbox"/> No				
Was an Inspection conducted on this portion of the job? <input type="checkbox"/> Yes <input type="checkbox"/> No				
Additional Actions (Contributing factors may include number of hours at work prior to failure or time of day work being conducted):				
Training Procedures:				
Operation Procedures:				
Controller Activities:				
Name	Title	Years Experience	Hours on Duty Prior to Failure	Shift
Alarm Parameters:				
High/Low Pressure Shutdown:				
Flow Rate:				
Procedures for Clearing Alarms:				
Type of Alarm:				
Company Response Procedures for Abnormal Operations:				
Over/Short Line Balance Procedures:				

Operator/Contractor Error	<input checked="" type="checkbox"/> N/A
Frequency of Over/Short Line Balance:	
Additional Actions:	

Additional Actions Taken by the Operator	<input type="checkbox"/> N/A
<p>Make notes regarding the emergency and Failure Investigation Procedures (Pressure reduction, Reinforced Squeeze Off, Clean Up, Use of Evacuators, Line Purging, closing Additional Valves, Double Block and Bleed, Continue Operating downstream Pumps):</p> <p>COH established and secured a perimeter around the building and assisted the Strongsville Fire Department.</p>	

Photo Documentation (1)

Overall Area from best possible view. Pictures from the four points of the compass. Failed Component, Operator Action, Damages in Area, Address Markings, etc.

Photo No.	Description	Roll No.	Photo No.	Description	Roll No.
1	Fire damage to riser and meter		1		
2	Close-up of fire damage to riser		2		
3	Overall view of fire damage to riser, meter and building		3		
4	North side of building		4		
5	North and west side of building		5		
6	East and north side of building		6		
7	Depth of service line		7		
8	Separation of compression ell		8		
9	Overall view of riser, spike anode and section of service line		9		
10			10		
11			11		
12			12		
13			13		
14			14		
15			15		
16			16		
17			17		
18			18		
19			19		
20			20		
21			21		
22			22		
23			23		
24			24		
25			25		
26			26		
27			27		
28			28		
29			29		
30			30		

Type of Camera:

Film ASA:

Video Counter Log (Attach Copy):

Additional Information Sources

Agency	Name	Title	Phone Number
Police:	N/A		
Fire Dept.:	Mario Damico	Strongsville FD	N/A
State Fire Marshall:			
State Agency:			
NTSB:			
EPA:			
FBI:			
ATF:			
OSHA:			
Insurance Co.:			
FRA:			
MMS:			
Television:			
Newspaper:			
Other:			

Persons Interviewed

Name	Title	Phone Number
Rob Smith	Compliance Specialist	(614) 818-2110
Brian Collins	F.O.L.	(440) 665-4808
Dave Brattoli	F.O.L.	(440) 336-6251

Event Log

Sequence of events prior, during, and after the incident by time. (Consider the events of all parties involved in the incident, Fire Department and Police reports, Operator Logs and other government agencies.)

[illegible]

[illegible]

[illegible]

Site Description

Provide a sketch of the area including distances from roads, houses, stress inducing factors, pipe configurations, etc. Bar Hole Test Survey Plot should be outlined with concentrations at test points. Photos should be taken from all angles with each photo documented. Additional areas may be needed in any area of this guideline.