

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's : Case No. 16-1578-GA-COI
Investigation into Ohio Rural Natural :
Gas Co-Op and Related Matters. :

PREPARED TESTIMONY

OF

CHRISTOPHER DOMONKOS
SERVICE MONITORING AND ENFORCEMENT DEPARTMENT
GAS PIPELINE SAFETY DIVISION

STAFF EXHIBIT____

August 30, 2016

1 1. Q. Please state your name and business address.

2 A. My name is Christopher Domonkos. My address is 180 E. Broad Street,
3 Columbus, Ohio 43215-3793.
4

5 2. Q. By who are you employed?

6 A. I am employed by the Public Utilities Commission of Ohio.
7

8 3. Q. What is your present position with the Public Utilities Commission of Ohio
9 and what are your duties?

10 A. My present position with the commission is Gas Pipeline Safety Compliance
11 Safety Investigator. My current duties entail the auditing of natural gas oper-
12 ators in Ohio, along with the investigation of pipeline incidents, complaint
13 investigations, and code enforcement.
14

15 4. Q. Would you briefly state your educational background and work history?

16 A. Prior to joining the commission in November 2014, I was employed by Orwell
17 Natural Gas in Mentor Ohio for over 10 years. During my tenure at Orwell, I
18 held various positions, with my final position being Gas Operations Manager.
19 I was also employed by Mueller Energy Services as a construction foreman. I
20 graduated from West Geauga High School in 1990, and continued my educa-
21 tion at the University of Toledo studying Criminal Justice/Law Enforcement.
22

1 5. Q. What is the purpose of your testimony in this case?

2 A. My testimony is to provide accurate details of the events that were observed
3 during a complaint and routine investigations of Ohio Rural Natural Gas Co-
4 operative (ORNG).

5
6 **November 20, 2015**

7 6. Q. Did you conduct an inspection of the ORNG facilities at Tin Man Storage on
8 November 20, 2015?

9 A. Yes.
10

11 7. Q. Can you describe what happened on November 20, 2015 at the Tin Man
12 Storage site?

13 A. I received a phone call at approximately 11:40 a.m. from my supervisor Peter
14 Chace advising me of an unidentified operator possibly tampering with Orwell
15 Natural Gas (Orwell) mains located on Tin Man Drive in Mentor, Ohio. I
16 arrived at the Tin Man site at 12:23 p.m. and found a very chaotic situation. I
17 was immediately confronted by Jeff Heidnik from Orwell Natural Gas. He
18 advised me that ORNG employees had arrived at the site at approximately 7:30
19 a.m., and had excavated the Orwell gas main that supplied gas to the Tin Man
20 Storage units located at 6272, 6273, and 6275 Tin Man Road. He further
21 stated that the main had been cut to discontinue natural gas service to the above
22 mentioned addresses without consent of Orwell or any of their customers.

1 ORNG employees were also removing Orwell's existing meters and replacing
2 them with ORNG meters.

3 Rick Osborne Sr. of ORNG was also present on site and stated that the main
4 and service lines were located on private property and that he owned the prop-
5 erty. He advised that Orwell employees were not allowed to enter his property
6 and would be arrested if such actions occurred. I asked Mr. Osborne if he
7 would allow Orwell's employees to enter the premises to allow them to remove
8 their meters. He agreed as long as I accompanied them during the removal
9 process. The Orwell meters were then removed without incident.

10 At 2:38 p.m. Peter Chace advised me that I should stay on sight to continue
11 monitor the process. I witnessed multiple rule violations during the installation
12 of the M&R station, inlet piping, and downstream main and service lines.

13 These violations included facilities that were not properly tested to establish a
14 Maximum Allowable Operating Pressure, service lines that were not properly
15 tested (44 total) prior to restoring service, meters that were installed without
16 establishing a pressure test of the downstream piping or checking the inlet
17 pressure to ensure the proper operation of the service regulators, and the
18 ORNG employees that were installing meters without the proper operator
19 qualifications.

20
21 8. Q. Did you watch any of the meters being set on Friday, November 20?

22 A. Yes.

1 9. Q. Were the meters installed in accordance with applicable safety regulations?

2 A. No. I observed Jack McCormick and Ryan McCormick of ORNG install
3 multiple meters without properly testing the downstream lines for any potential
4 leaks. The service regulators were not checked for proper operation prior to
5 restoring gas service to the individual units. Downstream piping was also not
6 inspected by any individual from ORNG for improper installation prior to
7 restoring gas service. After requesting both Jack and Ryan McCormick's
8 Operator Qualification cards, it was determined that neither individual was
9 trained or qualified in the proper installation of natural gas meters.

10
11 10. Q. What does it mean to be "qualified" to work on natural gas pipelines?

12 A. Contractors and workers who build and install gas pipelines are required by
13 state and federal law to have up current instruction and qualification on the
14 procedures for safely installing gas pipeline components. There are multiple
15 tasks for which a worker may be qualified to complete while there are others
16 that the worker may not be qualified to perform. For example, a contractor
17 may be qualified to work on plastic pipelines, but not qualified to work on
18 pressure stations.

19
20 11. Q. Is the installation of M&R stations and meters something that is covered by the
21 operations and procedures manual of a gas pipeline company?

1 A. Yes. Those procedures are required components of a pipeline company's
2 operations and qualifications manual.

3
4 12. Q. On what Date was the Tin Man site put into operation by ORNG?

5 A. November 20, 2015.

6
7 13. Q. What were the rule violations you witnessed related to the M&R station when
8 you arrived on November 20, 2015?

9 A. The M & R station was missing a sensing line to allow the proper operation of
10 the monitor regulator and the bypass valve was not properly secured (locked)
11 to prevent unauthorized operation. Additionally, an upstream emergency valve
12 was not installed by ORNG prior to placing the system in service making it dif-
13 ficult for the gas to be shut off in the event of an emergency.

14
15 14. Q. What was the likelihood that the M&R station, as built by ORNG, would fail?

16 A. Since the station was not properly designed or installed to prevent a single fail-
17 ure, the likelihood would be very high.

18
19 15. Q. What would happen if the M&R station failed?

20 A. If the M & R station failed, over-pressurization would occur to the downstream
21 distribution system. The service regulators and other facilities installed at the
22 Tin Man site were not designed to be able to handle inlet pressures which were

1 present on the day of the initial complaint. This potential overpressure situa-
2 tion means that the facilities in each individual unit that were designed to
3 handle less than one psig of pressure, would become pressurized with
4 approximately 200 psig.

5
6 **November 25, 2015**

7 16. Q. Were you called to the Tin Man site again on November 25, 2015?

8 A. Yes. I received a call at approximately 3:45 p.m. on Wednesday, November
9 25, 2015 from Peter Chace. He advised me that Mentor Fire Department
10 (MFD) had called the PUCO regarding a developing situation at the Tin Man
11 Storage facility.

12
13 17. Q. Can you describe what you found when you arrived?

14 A. I arrived on site at approximately 4:15 p.m., about the same time as Mr. Cessna
15 of ORNG, and his contractor Thomas Rowland from Big Oats Supply. Upon
16 arrival MFD was already on scene and there was a very distinct odor of natural
17 gas in the air. Dominion East Ohio Gas and Orwell Natural Gas also had per-
18 sonnel on site because there was uncertainty as to the source of the leaks.
19 Neither of the ORNG personnel on site had leak detection equipment with
20 them to accurately grade the severity of the leak. Instead, the company per-
21 sonnel resorted to using soap and water to try to determine the severity of the
22 leaks. The MFD did have leak detection equipment and began checking the

1 property for gas leaks. MFD determined that there were multiple leaks around
2 the meters, the risers, and the M&R station. After consultation between
3 Battalion Chief Tillman of MFD, Peter Chace, and myself, regarding the
4 existing safety concerns, the MFD ordered ORNG to shut down the gas facili-
5 ties. ORNG employees were advised the system would not be allowed to be
6 operational again until it was in compliance with the Pipeline Safety Regula-
7 tions.

8
9 18. Q. In the following days did the PUCO perform an assessment of the system?

10 A. Yes. I performed an assessment of the system and on Tuesday, December 1,
11 2015 a notice of probable compliance was sent to the company outlining all the
12 safety violations that I found, and requiring that those problems be corrected.

13
14 19. Q. How many of the meters did you find were leaking?

15 A. Thirty meters were leaking.

16
17 20. Q. Where were there other leaks in the system?

18 A. Yes. There was leaking around the plastic risers for the meters, and there were
19 leaks along the service lines and leaks upstream from the M&R station.

20
21 21. Q. Did the company disconnect and reinstall the meters?

1 A. Yes, between December 7 and December 11, 2015, I was onsite to observe the
2 re-installation of all 68 meters. I assisted the compliance officer Amy Caunter
3 in overseeing the setting of any meters, and proper installation of meters. The
4 assistance was in the form of verbal guidance from manufacturer's instructions
5 in setting residential meters.
6

7 22. Q. Were the meters installed correctly?

8 A. Yes.
9

10 **March 16, 2016**

11 23. Q. Did you conduct an inspection of the ORNG facilities on Wednesday, March
12 16, 2016?

13 A. Yes. I was driving on Duck Creek Road in Berlin Township on March 16,
14 2016 and I noticed two ORNG employees working with 4 inch plastic pipe on
15 the side of the road. The employees were in the process of installing the pipe
16 underneath the public roadway and in road right of way along Duck Creek
17 Road. I stopped and conducted a random inspection.
18

19 24. Q. What were the results of your inspection?

20 A. My inspection revealed the procedures being used by ORNG employees were
21 incorrect. The employees were not following the pipe manufacturer's instruc-
22 tions for joining plastic pipe (butt fusion). The operator was using a heating

1 temperature of 500 degrees Fahrenheit instead of the pipe manufacturer's
2 recommended temperature of 400-450 degrees Fahrenheit. The employees
3 were not properly aligning the pipe in the McElroy pipe vice or using two han-
4 dles as required by the manufacturer of the vice. The employees were not fol-
5 lowing general fusing practices such as cleaning the pipe ends prior to facing
6 or joining. The winds observed that day were in excess of 30 mph with no
7 shielding being provided during the fusion process. It was also noted that the
8 joining time between removing the iron and joining the pipe exceeded the 10
9 second threshold. As a result, the joints they made had obvious visual defi-
10 ciencies that should have been identified by the employees.

11
12 25. Q. You said the Employees were not following manufacturer instructions. Did
13 they have the instructions with them?

14 A. They had a manual, but the pages relating to proper butt fusion were not in the
15 manual.

16
17 26. Q. Did you question them on this issue?

18 A. Yes. I asked if they had instructions for butt fusion of pipeline joints, but they
19 did not know what "butt fusion" was.

20
21 27. Q. Is this a problem?

1 A. Yes. The procedures for butt fusion are intended to make sure that a solid,
2 permanent seal is created between two segments of pipe. Failure to follow the
3 proper procedures creates physical defects in the integrity of the joint, and cre-
4 ates a higher risk of failure, leak and potential explosion.

5
6 28. Q. Were these joints going to be installed underneath a public roadway?

7 A. Yes. They were preparing to run the pipe underneath Duck Creek Road, which
8 is a two lane rural public road in Northeastern Ohio.

9
10 29. Q. What actions did you take after your inspection?

11 A. I advised them they were not fusing the pipes together correctly, and they
12 needed to follow the manufacturer's instructions. When they could not find
13 the proper instructions for butt fusion of the pipes, they stopped work.

14
15 30. Q. Is proper technique for building pipelines using butt-joint fusion something
16 that would be contained in a company's Operations and procedures manual?

17 A. Yes.

18
19 31. Q. If the company enforced its policies and procedures manual, would this kind of
20 violation have occurred?

21 A. No.

1 32. Q. Does this conclude your testimony?

2 A. Yes, it does. However, I reserve the right to submit supplemental testimony as
3 described herein, as new information subsequently becomes available or in
4 response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prepared Testimony of Christopher Domonkos, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail, upon the following parties of record, this 30th day of August, 2016.

/s/ Werner L. Margard III

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Summary: Testimony Prepared Testimony of Christopher Domonkos submitted by Assistant Attorney General Werner Margard on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio