

pressure (MAOP). The following safety precautions may be considered to ensure the test area remains clear:

1. Placing caution signs or barriers along the pipeline route wherever deemed appropriate, such as at roads and public corridors.
2. Aerial surveillance of the pipeline route, when practical, to monitor activity in the test area when testing with natural gas, inert gas or air.
3. Notifying parties located in the general vicinity of the pipeline to avoid the test area during the test period.
4. Notifying law enforcement agencies, fire departments, state and highway departments, railroad and utility companies with facilities in the test area, and as applicable, airport operators regarding the scope and test period. Notify Dominion's dispatch, call center and/or gas control, as required for the particular project, as they may receive odor/excessive noise calls.
5. When the test is being conducted in high exposure areas, consideration should be given to the following:
  - a. Scheduling the test at a time to minimize public exposure.
  - b. Limiting the length of the test section to minimize potential hazards.

C. Whenever test pressures result in a hoop stress in excess of 90 percent of SMYS, the following additional precautions may be considered to minimize the risk to occupants of buildings in close proximity to the pipeline:

1. Using pre-tested pipe.
2. Using energy-absorbing devices such as sandbag barriers, backfill, piling and walls.
3. Use hydrostatic (water) instead of air, inert gas or natural gas, as a test medium.

**Note: Hydrostatic testing will show leaks faster than other testing mediums and is safer in case of leaks or ruptures during testing.**

D. For detailed safety procedures, refer to the Safety SOPs listed below.

### **III. ENVIRONMENTAL PROTECTION**

**A. Hydrostatic testing medium shall be disposed of in a manner that will minimize damage to the environment.**

B. Refer to [Environmental SOP 120-34 Water - NPDES Hydrostatic Test Water Discharge Permits](#) for test medium disposal procedures.

C. Contact environmental personnel, if assistance/direction is needed.

#### **Exceptions**

N/A

#### **Environmental**

[Environmental SOP 120-34 Water - NPDES Hydrostatic Test Water Discharge Permits](#)

#### **Safety**

[360-07 Portable Fire Extinguishers](#)

[360-19 Personal Protective Equipment](#)

[360-20 Prevention of Accidental Ignition of Natural Gas](#)

[360-25 Excavation Safety](#)

[360-26 Work Zone Traffic Control](#)

#### **Work Procedures**

### **Charts, Graphs & Drawing, Lists**

### **Forms**

### **Regulations**

DOT 49 CFR 192.515

If printing this page, be aware that the information contained in this document is only valid for the date printed in the lower right hand corner of each printed page. Please check with your supervisor to make sure there have been no updates to the printed version.

**Exhibit 22**  
**Field Photos of Buried Fitting**















**Exhibit 23**

**Field Photos of Main with Insufficient Cover**







**Exhibit 24**  
**Enforcement Actions**

1. Notice of Probable Non-Compliance Issued February 28, 2012
2. Notice of Probable Non-Compliance Issued April 4, 2012
3. Notice of Probable Non-Compliance Issued December 26, 2013
4. Notice of Probable Non-Compliance Issued January 16, 2015
5. Notice of Probable Non-Compliance Issued June 3, 2015
6. Notice of Probable Non-Compliance Issued August 6, 2015
7. Notice of Probable Non-Compliance Issued September 28, 2015
8. Notice of Probable Non-Compliance Issued December 23, 2015
9. Notice of Probable Non-Compliance Issued May 19, 2016
10. Notice of Probable Non-Compliance Issued September 19, 2016
11. Notice of Probable Non-Compliance Issued September 21, 2016
12. Notice of Probable Non-Compliance Issued March 24, 2017
13. Notice of Probable Non-Compliance Issued June 28, 2017
14. Notice of Probable Non-Compliance Issued August 10, 2017
15. Notice of Probable Non-Compliance Issued September 20, 2017
16. Notice of Probable Non-Compliance Issued October 18, 2017
17. Notice of Probable Non-Compliance Issued November 9, 2017
18. Notice of Probable Non-Compliance Issued April 17, 2018
19. Notice of Probable Non-Compliance Issued June 4, 2018
20. Notice of Probable Non-Compliance Issued August 31, 2018
21. Notice of Probable Non-Compliance Issued November 21, 2018
22. Notice of Probable Non-Compliance Issued December 14, 2018
23. Warning Letter Issued April 5, 2019
24. Notice of Probable Non-Compliance Issued January 21, 2020
25. Notice of Probable Non-Compliance Issued January 22, 2020





## Public Utilities Commission

John R. Kasich, Governor  
Todd A. Snitchler, Chairman

### Commissioners

Paul A. Centolella  
Cheryl Roberto  
Steven D. Lesser  
Andre T. Porter

February 28<sup>th</sup>, 2012

Anne Bomar  
Vice President & General Manager  
Dominion East Ohio Gas  
1201 E. 55<sup>th</sup> St., PO Box 5759  
Cleveland, OH 44101-0759

Dear Ms. Bomar:

On January 3<sup>rd</sup>, 2012 – January 12<sup>th</sup>, 2012, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at the Canton Operating Center in Canton, OH, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio Gas in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:jn  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Ms. Anne Bomar Title Vice President & General Manager  
Operator Dominion East Ohio Gas  
Address 1201 E. 55<sup>th</sup> St., PO Box 5759  
City Cleveland State OH Zip Code 44101-0759  
Date of Inspection January 12<sup>th</sup>, 2012 Place of Inspection DEOG Canton OH  
GPS Inspector Jeffery Burdette & Keith Topovski

**DESCRIPTION**

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

- (1) Section 192.801(49 C.F.R.); Title: Scope.
- (2) Section 192.805(49 C.F.R.); Title: Qualification Program.
- (3) Section 199.101(49 C.F.R.); Title: Anti-drug plan.

**Describe Probable Noncompliance**

**192.801(b)** *For the purpose of this subpart, a covered task is an activity, identified by the operator, that:*

- (1) Is performed on a pipeline facility;*
- (2) Is an operations or maintenance task;*
- (3) Is performed as a requirement of this part; and*
- (4) Affects the operation or integrity of the pipeline.*

The DEOG adopted ASME B31Q-2006 covered task list does not show documentation of the four-part test being applied in determining each identified covered task.

The DEOG adopted ASME B31Q-2006 covered task list excludes Purging and Prevention of Accidental Ignition as covered tasks which are both identified as covered tasks meeting the four-part test of DEOG's original MEA ETN covered task list.

**192.805(a)** *Each operator shall have and follow a written qualification program.*

By not documenting the application of the four-part test to each covered task, DEOG failed to follow Section C of its written OQ program.

**199.101(a)** *Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures.*

DEOG failed to properly maintain its written anti-drug plan by not performing all of the required updates found in Amendment 40-25 effective 10-01-10.





# Public Utilities Commission

John Kasich, Governor  
Todd A. Snitchler, Chairman

## Commissioners

Paul A. Centolella  
Cheryl Roberto  
Steven D. Lesser  
Andre T. Porter

April 4, 2012

Anne E. Bomar  
Senior Vice President and General Manager  
Dominion East Ohio Gas Company  
1201 East 55<sup>th</sup> Street  
PO Box 5759  
Cleveland, OH 44103-0759

Dear Ms. Bomar:

On September 12, 2011 – October 12, 2011, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Western Operating Center in Cleveland, Ohio, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio Gas in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:jn  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Ms. Anne E. Bomar Title Senior Vice President & General Manager  
Operator Dominion East Ohio Gas  
Address 1201 East 55<sup>th</sup> Street, PO Box 5759  
City Cleveland State Ohio Zip Code 44103-0759  
Date of Inspection Sept 12 – Oct 12, 2011 Place of Inspection Cleveland, Ohio  
GPS Inspector Mary McKelvey

**DESCRIPTION**

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

- (1) Section 192.801(b)(49 C.F.R.); Title: Scope  
(2) Section 192.805(f)(h)(49 C.F.R.); Title: Qualification Program

**Describe Probable Noncompliance**

**192.801 (b)** *For the purpose of this subpart, a covered task is an activity, identified by the operator, that:*

- (1) Is performed on a public facility;*
- (2) Is an operations or maintenance task;*
- (3) Is performed as a requirement of this part; and*
- (4) Affects the operation or integrity of the pipeline.*

The Operator has not identified the sealing of caulked bell and spigot joints as a covered task. See the requirements for sealing joints in 49 C.F.R 192.275(a) and 192.753(b).

**192.805 (f)** *Communicate changes that affect covered tasks to individuals performing those covered tasks;*

The operator has modified their procedures and Approved Leak Repair Matrix for Mueller 500 Series clamps used on fiberglass piping, regarding the use of DS-8024 Epoxy Adhesive with the clamp for temporary or permanent repair. The changes made to the Operator's procedure and Matrix are significant enough to require modification to the operator qualification program and to require re-evaluation of employees or contractors performing this activity.

Return written response within 30 days to:

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

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





## Public Utilities Commission

John R. Kasich, Governor  
Todd A. Snitchler, Chairman

### Commissioners

Steven D. Lesser  
Asim Z. Haque  
Lynn Slaby  
M. Beth Trombold

December 26, 2013

Mr. Scott Miller  
Vice President & General Manager  
Dominion East Ohio Gas  
1201 E. 55<sup>th</sup> St., PO Box 5759  
Cleveland, OH 44101-0759

Dear Mr. Miller:

On November 4<sup>th</sup> - December 12<sup>th</sup>, 2013, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at The Canton Shop in Canton, Ohio, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio Gas in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:jn  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Mr. Scott Miller Title Vice President & General Manager  
Operator Dominion East Ohio Gas  
Address 1201 E. 55th St., PO Box 5759  
City Cleveland State OH Zip Code 44101-0759  
Date of Inspection December 12<sup>th</sup>, 2013 Place of Inspection DEOG Belmont Shop  
GPS Inspector Jeffery Burdette

**DESCRIPTION**

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

- (1) Section 192.13(c) (49 C.F.R.); Title: What general requirements apply to pipelines regulated under this part?  
(2) Section 192.805(b) (49 C.F.R.); Title: Qualification program.

**Describe Probable Noncompliance**

**§192.13(c)** *Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it required to establish under this part.*

Dominion Standard Operating Procedure 290: Pressure Testing requires a test duration for plastic pipelines two (2) inches and larger of a minimum of one (1) hour. Four 2" and larger plastic service lines were documented as having been tested for ten (1) minutes instead of one hour at the following Canton locations during 2012: 1721 6th Street SW, 1707 6th Street SW, 206 Park Avenue SW, and 4886 Hills & Dales Road.

**§192.805(b)** *Ensure through evaluation that individuals performing covered tasks are qualified.*

Operator documentation demonstrates evaluation for the performance of leak surveys and recognition and reaction to abnormal operating conditions, but field inspection revealed the individual performing the covered task "1202: Outside Leakage Investigation, Pinpointing and Grading" reveals unfamiliarity with pinpointing and grading criteria. Staff's concern was specifically with properly using leak grading equipment to establish the outer boundary of leak indications, making bar hole tests at required intervals at the same depth using even spacing, and recording sustained readings for each of the bar hole test holes as required by the covered task guidelines. Staff also has concerns about the use of a Flame Ionization Detector for leak pinpointing and grading instead of a device capable of determining percent gas in air (such as a Combustible Gas Indicator).





# Public Utilities Commission

John R. Kasich, Governor  
Thomas W. Johnson, Chairman

## Commissioners

Steven D. Lesser  
Asim Z. Haque  
Lynn Slaby  
M. Beth Trombold

January 16, 2015

Scott Miller  
Vice President & General Manager  
Dominion East Ohio  
1201 E. 55th Street  
PO Box 5759  
Cleveland, OH 44103

Dear Mr. Miller:

On November 21, 2014 to January 7, 2015, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Northeast Shop, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to	<u>Scott Miller</u>	Title	<u>Vice President &amp; General Manager</u>
Operator	<u>Dominion East Ohio</u>		
Address	<u>1201 E. 55th Street</u>		
City	<u>Cleveland</u>	State	<u>OH</u> Zip Code <u>44103</u>
Date of Inspection	<u>November 21, 2014 to January 7, 2015</u>	Place of Inspection	<u>Northeast Shop</u>
GPS Inspector	<u>Chris Domonkos &amp; Jeff Polka</u>		

**DESCRIPTION**

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

- |                                    |  |
|------------------------------------|--|
| (1) Section 192.13(c)(49 C.F.R.);  | Title: What general requirements apply to pipelines regulated under this part? |
| (2) Section 192.743(a)(49 C.F.R.); | Title: Pressure limiting and regulating stations: Capacity of relief devices.  |
| (3) Section 192.805(b)(49 C.F.R.); | Title: Qualification program.  |

**Describe Probable Noncompliance**

- 192.13(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.**

Dominion's Standard Operating Procedure 290: Pressure Testing requires a test duration for plastic pipelines two (2) inches and larger of a minimum of one (1) hour. Three 2" and larger plastic service lines were documented as having been tested for ten (10) minutes instead of one hour at the following Northeast locations during calendar year 2013: 871 E. 141<sup>st</sup> St., 971 E. 141<sup>st</sup> St., and 13901 Aspinwall, all in Cleveland. This same violation of 192.13(c) was previously cited against Dominion on December 26, 2013, and as part of corrective action for this violation Dominion stated in correspondence dated January 24, 2014 that "Dominion will review all 2" or larger service lines installed since 2012. Based on an electronic query of our Customer Care System (CCS), DEO has identified 105 such installations. DEO will review the original paperwork for each of these 105 service lines, and any that are found not tested for a minimum of one hour will be retested according to SOP." None of the three identified 2" plastic services were among the 105 identified installations.

- 192.743(a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected....The capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.**

Dominion's station LS-79-LD (Blackbrook-Gibbs) had incorrect information in the RSIS Database used to record regulator station information and on the E110 "Overpressure Protection Verification Form" used to calculate relief capacities. The type of regulator, regulator setpoint, and outlet MAOP were incorrect, resulting in an incorrect relief capacity calculation. Staff notes that the both the calculated and actual relief capacity at the Blackbrook-Gibbs station was sufficient to meet the requirements of 49 C.F.R. 192.201. A violation of 192.743(a) was previously cited against Dominion on May 9, 2013 and as part of corrective action for this violation Dominion agreed in correspondence dated October 18, 2013 to "review set points and perform relief calculations on all of the relief valves identified in the system as primary over pressure protection devices... DEO will complete this review by March 31, 2014".



**192.805(b)      Ensure through evaluation that individuals performing covered tasks are qualified.**

Leak grading records at the Northeast office revealed the individual performing the covered task "1202: Outside Leakage Investigation, Pinpointing and Grading" conducted grading of two leaks (3249 Desota, Cleveland Heights on 08 Aug 14, and 7780 Battles Road, Gates Mill on 05 Sept 14) through use of a "Flame Pack Only", contrary to the listed covered task requirements. This violation was previously cited against Dominion on December 26, 2013.





## Public Utilities Commission

John R. Kasich, Governor  
Andre T. Porter, Chairman

### Commissioners

Asim Z. Haque  
Lynn Slaby  
M. Beth Trombold  
Thomas W. Johnson

June 3, 2015

Jeff Murphy  
Senior Vice President  
Dominion East Ohio  
1201 East 55<sup>th</sup> Street  
P.O. Box 5759  
Cleveland, OH 44103

Dear Mr. Murphy:

On March 9-April 29, 2015, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Randall Shop, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jeff Murphy Title Senior Vice President  
Operator Dominion East Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State OH Zip Code 44103  
Date of Inspection March 9-April 29, 2015 Place of Inspection Randall Shop  
GPS Inspectors Chris Domonkos & Keith Topovski

**DESCRIPTION**

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

- (1) Section 192.479(a) (49 C.F.R.); Title: Atmospheric corrosion control: General.
- (2) Section 192.481(c) (49 C.F.R.); Title: Atmospheric corrosion control: Monitoring.
- (3) Section 192.605(a) (49 C.F.R.); Title: Procedural manual for operations, maintenance, and emergencies.
- (4) O.A.C. 4901:1-16-04(I)(1); Title: Records and maps; inspections.

**Describe Probable Noncompliance**

**192.479(a)** *Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.*

Uncoated steel pipe was observed at the K-Mart at 7701 Broadview and the Hinckley Ridge Baptist Church at 1270 State Road.

**192.481(c)** *If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by 192.479.*

Extensive atmospheric corrosion and pitting was identified by Dominion East Ohio on July 13, 2013 on the steel line known as the Daniel's Runoff segment at the Twinsburg Station. This atmospheric corrosion and pitting was not remediated and was observed during a pipeline safety inspection by Staff in April of 2015.

**192.605(a)** *Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.*

Dominion East Ohio procedure SOP 70-17, "Remedial Measures" states "remedial measures for external or internal corrosion shall be completed within 15 months or by the next required inspection, whichever is less". Extensive atmospheric corrosion and pitting was documented at the Twinsburg Station on July 13, 2013 and was not remediated within 15 months.

Leak # 1096142 located at Brainard & Shaker Blvd. in Pepper Pike was not monitored as frequently as necessary but at least once every 8 hours as required by Dominion East Ohio procedures.



**O.A.C. 4901:1-16-04(I)(1)**

***If the hazardous condition associated with leaks classified as grade one is eliminated, such as by venting, temporary repair, but the possibility of the hazardous condition returning exists, the condition must be monitored as frequently as necessary, but at least once every eight hours, to protect life and property until the possibility of the hazardous condition returning no longer exists.***

Leak # 1096142, Brainard & Shaker Blvd. in Pepper Pike was not monitored as frequently as necessary but at least once every 8 hours as required by Dominion East Ohio procedures. A hazardous leak was identified on March 11, 2014 and monitoring was not performed within the eight hour time period on March 15<sup>th</sup>, 16<sup>th</sup>, or 17<sup>th</sup>.



# Public Utilities Commission

John R. Kasich, Governor  
Andre T. Porter, Chairman

## Commissioners

Asim Z. Haque  
Lynn Staby  
M. Beth Trombold  
Thomas W. Johnson

August 6, 2015

Jeffrey A. Murphy  
Vice President  
Dominion East Ohio  
1201 East 55<sup>th</sup> Street  
P.O. Box 5759  
Cleveland, OH 44101-0759

Dear Mr. Murphy:

On May 18 - June 30, 2015, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Youngstown, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jeffrey A. Murphy Title Vice President  
Operator Dominion East Ohio  
Address 1201 East 55<sup>th</sup> Street P.O. Box 5759  
City Cleveland State OH Zip Code 44101-0759  
Date of Inspection May 18 - June 30, 2015 Place of Inspection Youngstown  
GPS Inspector Chris Domonkos

**DESCRIPTION**

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

- (1) Section 192.605(a) (49 C.F.R.); Title: Procedural manual for operations, maintenance, and emergencies.  
(2) Section 192.625(f) (49 C.F.R.); Title: Odorization of gas.  
(3) Section 192.805 (49 C.F.R.); Title: Qualification program.

**Describe Probable Noncompliance**

*192.605 Procedural manual for operations, maintenance, and emergencies.  
(a) Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.*

**Dominion East Ohio did not follow their Standard Operating Procedure (SOP) 230.04 that requires Gas Control or a Supervisor to be notified immediately of any odorant read above 1% natural gas in air.**

*192.625 Odorization of Gas.  
(f) To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.*

**Dominion East Ohio used a Heath Odorator to conduct period sampling that was out of calibration from 7/18/2014 to 11/26/2014.**

*192.805 Qualification program.  
Each operator shall have and follow a written qualification program. The programs shall include provisions to: (b) Ensure through evaluation that individuals performing covered tasks are qualified.*

**Gas odorant tests performed on 4/21/2014 showed 15 reads above the Dominion East Ohio standard of 1% natural gas in air, and tests performed on 10/21/2014 showed 12 reads above 1% natural gas in air. One of the reads recorded was 2.05% which is not possible as the Heath Odorometer will only register a read as high as 1.99% according to their operator's manual. These reads were not recognized by the employees taking the readings as an Abnormal Operating Condition and no action was taken to report, investigate or correct these readings.**



# Public Utilities Commission

John R. Kasich, Governor  
Andre T. Porter, Chairman

## Commissioners

Asim Z. Haque  
Lynn Slaby  
M. Beth Trombold  
Thomas W. Johnson

September 28, 2015

Jeffrey A. Murphy  
Vice President  
Dominion East Ohio  
1201 E. 55<sup>th</sup> St.  
Cleveland, OH 44101-0759

Dear Mr. Murphy:

On August 17-September 3, 2015, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Western Shop, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jeffrey A. Murphy Title Vice President  
Operator Dominion East Ohio  
Address 1201 E. 55<sup>th</sup> St.  
City Cleveland State OH Zip Code 44101-0759  
Date of Inspection August 17-September 3, 2015 Place of Inspection Western Shop  
GPS Inspector Chris Domonkos

**DESCRIPTION**

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

(1) Section 192.13 (49 C.F.R.); Title: What general requirements apply to pipelines regulated under this part?

**Describe Probable Noncompliance**

**192.13 What general requirements apply to pipelines regulated under this part?**

- (a) *No person may operate a segment of pipeline that is readied for service after March 12, 1971 unless (1) the pipeline has been designed, installed, constructed, initially inspected, and initially tested in accordance with this part.*
- (c) *Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*

Jurisdictional piping was discovered at two separate locations where no documentation exists to show the pipelines had been designed, installed, constructed, initially inspected, or initially tested in accordance with 49 C.F.R. 192, or that the operator had followed the plans, procedures, and programs required to operate and maintain the pipelines under 49 C.F.R. 192:

1. 4548 Great Northern Mall Dr., North Olmsted (Great Northern Mall). Gas is being supplied to the Great Northern Mall by DEOG line #25056. There is approximately 2,000 feet of exposed jurisdictional piping running across roof of the mall to serve several meters owned by DEOG. The majority of the piping is 4" steel main, with some lateral services consisting of 2" and 3" steel. There are segments of bare pipe or fittings without protection from atmospheric corrosion, and there are no physical markings to identify ownership. Combustible wooden supports are used at this location for the main and service lines, and for a commercial meter set (DEO meter #750 1006913). One inactive service was improperly disconnected according to DEOG SOP 50.01 by not locking the meter valve or plugging the disconnected customer piping. No records were available to demonstrate compliance with operation and maintenance requirements (surveillance, leak surveys, atmospheric corrosion inspections, etc.) or to establish a Maximum Allowable Operating Pressure (test records, piping specifications, etc.).
2. 1148 Main Avenue, Cleveland (Shooters Restaurant). Gas is being supplied to a commercial building by Dominion East Ohio Gas (DEOG) line # 22764 off regulator station LS-1802. There is approximately 200' of exposed jurisdictional 2" piping running up the side of the building and across the roof to service 2 separate meters owned by DEOG. The piping is bare steel and is not cleaned or coated, is supported by rotting wooden supports and has no physical markings to identify ownership. No records were available to demonstrate compliance with operation and maintenance requirements (surveillance, leak surveys, atmospheric corrosion inspections, etc.) or to establish a Maximum Allowable Operating Pressure (test records, piping specifications, etc.).





## Public Utilities Commission

John R. Kasich, Governor  
Andre T. Porter, Chairman

### Commissioners

Asim Z. Haque  
Lynn Slaby  
M. Beth Trombold  
Thomas W. Johnson

December 23, 2015

Mr. Jeffrey A. Murphy  
Vice President  
Dominion East Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, OH 44101-0759

Dear Mr. Murphy:

On October 29, 2015, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Garfield Heights, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Mr. Jeffrey A. Murphy Title Vice President  
Operator Dominion East Ohio  
Address 1201 East 55th Street  
City Cleveland State OH Zip Code 44101-0759  
Date of Inspection October 29, 2015 Place of Inspection Garfield Heights  
GPS Inspector Christopher Domonkos

**DESCRIPTION**

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

- (1) Section 192.605(a) (49 C.F.R.); Title: Procedural manual for operations, maintenance, and emergencies.
- (2) Section 192.614(c) (49 C.F.R.); Title: Damage prevention program.

**Describe Probable Noncompliance**

**192.605 Procedure manual for operations, maintenance, and emergencies.**

**(a) General – Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.**

Dominion East Ohio (DEO) Standard Operating Procedure (SOP) 90.01 "Damage Prevention", Section III(B)(4) states "Upon receipt of notification reporting contact, damage, or possible impending failure of the Company's facility, the Company should immediately conduct an inspection of the facility and make necessary repairs or the excavator should be advised that work may proceed".

DEO SOP 90.01 "Damage Prevention", Section III(B)(5) states "Upon receipt of notification that an unknown facility has been discovered during excavation work, the Company should immediately determine whether the facility is owned by the Company. The excavator should be advised whether or not the facility is owned by the Company and how to proceed with the excavation, including any special requirements the Company deems necessary".

DEO was notified in August of 2015 of an exposed gas main uncovered by an excavator engaged in constructing a bike path along Warner Road in Garfield Heights, OH. DEO operates two 20" steel mains in the project area. One was supposed to be abandoned according to DEO representatives and the information available to USIC, DEO's locating contractor. DEO did not respond to the report of the exposed main in accordance with SOP 90.01, Section III(B)(4). DEO also informed the excavator that the line was abandoned and refused repeated attempts by the excavator to provide additional information on the abandoned line or to perform a hot tap on the line to verify it was abandoned and not charged. After PUCO Staff involvement, DEO performed a hot tap on the main on November 5, 2015 and discovered the line was actually in service and pressurized. Staff also notes that there were East Ohio Gas line markers over the main indicating the gas line was in service. DEO did not take adequate action to determine whether an unknown facility was owned by the Company in accordance with SOP 90.01, Section III(B)(5).

**192.614 Damage Prevention Program.**

**(c) The damage prevention program required by paragraph (a) of this section must, at a minimum: (5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.**

DEO did not provide for temporary marking of buried pipelines in the area of excavation. Inaccurate temporary line markings were provided in the area of excavation at the Warner Road bike trail construction site in Garfield Heights. Maps provided to USIC were inaccurate and did not show the location of a 20" steel gas main. Existing marks along Warner Road were inaccurate and it appears the USIC locators were marking another foreign pipe on the site, possibly a water line. Accurate markings were not provided until November 5, 2015 when a wire was connected to the exposed 20" steel main to allow USIC to accurately mark the line.

Staff believes it is appropriate for DEO to conduct an investigation into why the 20" steel main along Warner Road in Garfield Heights was incorrectly classified as abandoned, why incorrect information on the line location was provided to USIC, why repeated requests from the excavator to confirm the exposed line was abandoned through a hot tap or other means were ignored, and what action can be taken to prevent future recurrences.





## Public Utilities Commission

John R. Kasich, Governor  
Andre T. Porter, Chairman

### Commissioners

Asim Z. Haque  
Lynn Slaby  
M. Beth Trombold  
Thomas W. Johnson

May 19, 2016

Jeff Murphy  
Vice President  
Dominion East Ohio Gas  
1201 East 55th Street  
Cleveland, Ohio 44101-0759

Dear Mr. Murphy:

On 3/7/16 - 3/29/16, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Lakeshore-Ashtabula, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio Gas in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jeff Murphy Title Vice President  
Operator Dominion East Ohio Gas  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State Ohio Zip Code 44101-0759  
Date of Inspection 3/7/16 - 3/29/16 Place of Inspection Lakeshore-Ashtabula  
GPS Inspector Chris Domonkos

**DESCRIPTION**

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

- (1) Section 192.465 (49 C.F.R.); Title: External corrosion control: Monitoring
- (2) Section 192.605 (49 C.F.R.); Title: Procedural manual for operations, maintenance, and emergencies
- (3) Section 192.805 (49 C.F.R.); Title: Qualification program

**Describe Probable Noncompliance**

*192.465 External corrosion control: Monitoring.*

- (a) *Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission line, not in excess of 100 feet (30 meters), or separately protected service line, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.*

**Dominion East Ohio was unable to provide records demonstrating that separately protected short sections of mains or service lines are surveyed on a sampling basis, with at least 10 percent surveyed each calendar year and a different 10 percent checked each subsequent year. Dominion East Ohio did provide a schedule of planned checks on separately protected short sections of mains or service lines that does not appear to survey at least 10 percent of these sections each year. Staff noted similar violations at the Dominion East Ohio Northeast and New Philadelphia operating areas. Dominion East Ohio must review their records to determine if documentation can be found, or identify and make changes in their business practices to preserve these records. Dominion East Ohio must also revise their sampling plan to comply with the requirements of 49 CFR 192.465(a) and take accelerated action to assess short sections of mains and services where no record of cathodic protection testing exists.**



<u>SCHEDULED READS</u>	<u>YEAR</u>	<u>DIVISION</u>
115	2016	ASHTABULA
163	2017	ASHTABULA
182	2018	ASHTABULA
113	2019	ASHTABULA
43	2020	ASHTABULA
74	2021	ASHTABULA
39	2022	ASHTABULA
84	2023	ASHTABULA
92	2024	ASHTABULA
97	2025	ASHTABULA
11	2026	ASHTABULA

*192.605 Procedural manual for operations, maintenance, and emergencies*

- (a) *General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.*

**Dominion East Ohio did not follow their Standard Operating Procedure (SOP) 230.04 that requires Gas Control or a Supervisor be notified immediately if any odorant reads exceed 1% gas in air. In June 2015, two odorant level reads taken at Rickcreek's Amoco in Pierpont, and St. Joseph Church in Jefferson exceeded 1% natural gas in air and was not reported to Gas Control or a Supervisor.**

*192.479 Atmospheric corrosion control: General*

- (a) *Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.*

**Metering and Regulating (M&R) station PS-P972 was installed without a proper coating to protect it from atmospheric corrosion and need to be cleaned and coated.**

*192.805 Qualification program*

- Each operator shall have and follow a written qualification program. The program shall include provisions to:*  
 (b) *Ensure through evaluation that individuals performing covered tasks are qualified;*

**Gas odor tests performed on 6/15/2016 and 6/16/2016 showed 2 reads above the Dominion East Ohio standard of 1% natural gas in air. These reads were not recognized by the employee taking the reads as an Abnormal Operating Condition and appropriate actions were not taken to report, investigate, or correct these readings.**



**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

Lynn Slaby  
M. Beth Trombold  
Thomas W. Johnson  
M. Howard Petricoff

September 19, 2016

Jeff Murphy  
Vice President  
Dominion East Ohio  
1201 East 55th Street  
Cleveland, Ohio 44101-0759

Mr. Murphy:

On 05/16/16 - 07/07/16, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Youngstown, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jeff Murphy Title Vice President  
Operator Dominion East Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State Ohio Zip Code 44101-0759  
Date of Inspection 05/16/16 – 07/07/16 Place of Inspection Youngstown  
GPS Inspector Chris Domonkos

**DESCRIPTION**

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

- (1) Section 192.161(a) (49 C.F.R.); Title: Supports and anchors.
- (2) Section 192.479(a) (49 C.F.R.); Title: Atmospheric corrosion control: General.
- (3) Section 192.481(a) (49 C.F.R.); Title: Atmospheric corrosion control: Monitoring.
- (4) Section 192.605(a) (49 C.F.R.); Title: Procedural manual for operations, maintenance, and emergencies.
- (5) Section 192.705 (49 C.F.R.); Title: Transmission lines: Patrolling.
- (6) Section 192.805 (49 C.F.R.); Title: Qualification program.

**Describe Probable Noncompliance**

- 192.161**      ***Supports and anchors.***  
***(a) Each pipeline and its associated equipment must have enough anchors or supports to:***  
***(1) Prevent undue strain on connected equipment***

The valve station identified as Station LS-00044 Brunstetter Rd. & Highland Rd., Warren has supports that have shifted and are not effective in supporting the pipeline. One is leaning over and not in contact with the pipe it is meant to support. The second support has a concrete base that is cracked and needs repaired to properly support the valve station.

- 192.479**      ***Atmospheric corrosion control: General***  
***(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.***

The following Dominion East Ohio Gas pipeline facilities show indications of atmospheric corrosion at soil-to-air interfaces, exposed pipe, pipe supports, and disbonded coatings:

- 1.) LS-00044 Brunstetter Valve Station - Several soil-to-air interface issues, atmospheric corrosion noted on horizontal piping, corrosion between and around flanges.
- 2.) LS-9600047 Farm Tap D-124, 414 Brunstetter Rd. – Soil to air interface issues, disbonded coatings, noted pitting on the outlet riser, bare steel inlet riser.
- 3.) LS-96000025 St. Joseph Hospital – Soil to air interface issues, disbonded coatings.



**192.481      Atmospheric Corrosion control: Monitoring**  
***(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion***

DEO cannot demonstrate monitoring of the LS-00044 Brunstetter Valve Station for atmospheric corrosion and has no records to show inspections were being performed. The first inspection of that facility was completed on 07/09/16.

**192.605      Procedural manual for operations, maintenance, and emergencies**  
***(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.***

Dominion East Ohio Gas failed to follow its standard operating procedure "SOP Section 070.16 / Corrosion Control - Atmospheric Corrosion", Section III (Monitoring Aboveground Pipelines) which states "Each aboveground piping shall be evaluated every three (3) calendar years, at intervals not exceeding 39 months, for atmospheric corrosion. Inspections may be visual or by any other methods approved by Gas Delivery Operations. Aboveground piping inspections should include pipe to soil air interfaces, pipe under thermal insulation, pipe under disbonded coatings, pipe supports, splash zones, dock penetrations and in spans over water. If atmospheric corrosion is discovered during the monitoring or examination process, remedial measures shall be taken as outlined in Corrosion Control SOP 70-17, Remedial Measures". DEO cannot demonstrate it is monitoring its aboveground valve station LS-00044 Brunstetter Rd. & Highland Rd. for atmospheric corrosion and has no records to show inspections were being performed prior to the 07/09/16 inspection.

**192.705      Transmission lines: Patrolling.**  
***(a) Each operator shall have a patrolling program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.***  
***(c) Methods of patrolling include walking, driving, flying, or other appropriate means of traversing the right-of-way.***

DEO Transmission line #254 has an approximately 10 foot segment in Canfield Township, Mahoning County that is exposed. Monthly aerial patrols failed to identify this exposure until 11/20/15 due to excessive growth of vegetation in the right of way. The exposure was also not identified by annual leak surveys. The DEO employee who investigated the exposure on 11/25/15 stated on field notes that "the exposed piping has been like this for years". Staff is concerned that DEO employees are not able to identify threats to their pipeline through aerial patrolling or leak surveys due to rights-of-way not being cleared.



**192.805*****Qualification program***

***Each operator shall have and follow a written qualification program. The program shall include provisions to: (b) Ensure through evaluation that individuals performing covered tasks are qualified***

Dominion East Ohio Gas Employees failed to identify atmospheric corrosion during annual inspections. The inspection records state atmospheric corrosion was not present at the following stations during the 2015 and 2016 regulator inspections:

- 1.) LS-9600047 - Farm Tap D-124, 414 Brunstetter Rd.
- 2.) LS-96000025 - St. Joseph Hospital

Leak detection employees failed to identify or document atmospheric corrosion during the routine leak survey conducted on the outlet line of station LS-9600047 - Farm Tap D-124, 414 Brunstetter Rd. Leak detection for the MP line which the farm tap is feeding was last conducted on 2/11/16. No leaks or atmospheric corrosion were reported.



**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

Lynn Slaby  
M. Beth Trombold  
Thomas W. Johnson  
M. Howard Petricoff

September 21, 2016

Jeff Murphy  
Vice President  
Dominion East Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, OH 44101-0759

Mr. Murphy:

On 7/25/16 - 8/25/16, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Eastern (Randall), pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jeff Murphy Title Vice President  
Operator Dominion East Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State OH Zip Code 44101-0759  
Date of Inspection 7/25/16 – 8/25/16 Place of Inspection Eastern (Randall)  
GPS Inspector Chris Domonkos

**DESCRIPTION**

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

- (1) Section 192.273(b) (49 C.F.R.); Title: Joining of Materials Other Than by Welding-General
- (2) Section 192.467(c) (49 C.F.R.); Title: External corrosion control: Electrical Isolation
- (3) Section 192.479(a) (49 C.F.R.); Title: Atmospheric corrosion control: General
- (4) Section 192.605(a) (49 C.F.R.); Title: Procedural manual for operations, maintenance, and emergencies
- (5) Section 192.705(b) (49 C.F.R.); Title: Transmission lines: Patrolling.
- (6) Section 192.805(b) (49 C.F.R.); Title: Qualification program.

**Describe Probable Noncompliance**

192.273      *Joining of Materials Other Than by Welding*  
                  *(b) Each joint must be made in accordance with written procedures that have been proved by test or experience to produce strong gas-tight joints.*

DEOG inspectors allowed the plastic joining of PE pipe on two separate PIR projects that exceeded the maximum heating temperatures without following written procedures to ensure compliance. PIR 600822 (P400088128), W. Snowville Rd. in Brecksville, noted heating iron temperatures on 11/11/15 and 11/12/15 above the maximum temperature of 450 degrees Fahrenheit as required by DEOG's plastic joining manual. PIR 800625 (P400056872), CLE17 Betterment Loop in Solon, had documented heating iron temperatures on 12/1/15, 12/15/16, and 12/16/16 exceeding the 450 degree Fahrenheit maximum. Staff recommends destructive testing of joints made with the heating temperatures used on the noted PIR projects under 192.283 to ensure these temperatures can produce strong gas-tight joints, and a management review of why these out of specification temperatures are not being noted by DEOG construction inspectors.



192.467 *External corrosion control: Electrical isolation*

*(c) Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing.*

DEOG failed to correct or take other measures to minimize corrosion for two shorted transmission casings. These casings have not been electrically isolated from the pipeline since at least 2013 without remediation. The areas are noted as follows:

- Unit 5.1, Zone T258, Line 258: Main -.965v, Casing -.965v
- Unit 7.1, Zone T259, Line 259: Main -1.140v, Casing -1.136v.

192.479 *Atmospheric corrosion control: General*

*(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.*

Bare piping was noted at multiple customer meters during the inspection. A new service line and meter manifold was installed at 15065 Kinsman Rd., Burton, due to a corrosion leak and the replaced piping is bare metal and was not cleaned or coated after replacement. Other meter manifolds have atmospheric corrosion and bare piping issues at that same address. Bare piping and active atmospheric corrosion was identified by Staff in 2015 at 12394 Kinsman Rd., Newbury, on a multiple meter manifold. Staff received a verbal commitment in 2015 to remediate the manifold; however as of 08/19/16 this has not been done. Sandblasting of pipe with atmospheric corrosion at station LS-1247-Kinsman and Ravenna Rd., Newbury created a leak on the outlet riser, showing that corrosion in this area is active and not light surface oxide. Most of the farm taps observed during the inspection (Geauga County) were uncoated with unremediated atmospheric corrosion.

It appears to Staff that the use of remote methane leak detector (RMLD) technology in the area and the installation of AMR readers on residential meters may be contributing to a failure to note and correct active corrosion.

192.605 *Procedural manual for operations, maintenance, and emergencies*

*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.*

Dominion East Ohio did not follow their Plastic Joining Manual that requires heating iron temperatures for plastic joining.

DEOG failed to follow their SOP SECTION: 070 / Corrosion Control SOP: 11 / Monitoring and Electrically Isolating Encased Crossings. Two shorted transmission casings have exceeded the 15 month remediation as required per their SOP. There is no documented remediation for either area.



192.705

*Transmission Lines: Patrolling*

*(b) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.*

Right-of-way (ROW) clearing is an issue at this operating area. DEOG is using aerial patrols in areas where tree canopies and excessive overgrowth of vegetation make it impossible to view potential threats. While attempting to view a transmission exposure on line # 265 in Bainbridge Township, Geauga County, the vegetation on the ROW was over six feet tall and a DEOG employee refused to walk to the exposure site due to the poor ROW conditions. Staff discovered another potential exposure located on this ROW while walking to the initial exposure. A diversion pipe installed above the main has washed out and is no longer located above the pipe it was installed to protect. These exposures were not noted or documented on any aerial patrols over the past year. While conducting cathodic reads on test point T259, the test point was difficult to locate due to an overgrowth of vegetation, again growth in the area was over six feet tall. DEOG is using aerial patrols to meet compliance in certain areas for their transmission system, which appears to be ineffective due to tree canopies and excessive vegetation growth blocking a clear view of the ROW. The ROW's in the DEOG system need to be cleared to make patrolling and adequate leak surveying possible, and as an interim measure foot patrols or other means of traversing the ROW need to be employed in these areas.

192.805

*Qualification program*

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

*(b) Ensure through evaluation that individuals performing covered tasks are qualified;*

Heating iron temperatures exceeded the maximum allowed temperature of 450 degrees Fahrenheit as required by DEOG's Plastic Joining procedures. The elevated heating iron temperatures were not recognized by the employees taking the reads as an Abnormal Operating Condition.

Leak detection employees failed to observe and document atmospheric corrosion during required leak survey inspections on several customer farm taps in Geauga County on State Route 87 (Kinsman Rd.) in Burton, Newbury, and Middlefield; Bell Rd. in South Russell, Newbury; and State Route 700 (Claridon Troy Rd.) in Burton, Troy. Staff recommends a management review of the DEOG Operator Qualification process for leak detection, to ensure areas of active atmospheric corrosion are identified and documented in the field.



# Public Utilities Commission

Asim Z. Haque, Chairman

## Commissioners

Lynn Slaby  
M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman

March 24, 2017

Jeff Murphy, Senior Vice President  
Dominion East Ohio  
1201 East 55th St.  
Cleveland, Ohio 44103

Mr. Murphy:

On January 16, 2017 to January 24, 2017, representatives of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at the Dominion East Ohio Gas (DEOG) Springside office at 320 Springside Drive, Akron OH pursuant to Section 4905.91(B) of the Ohio Revised Code. This inspection consisted of a review of new construction records and documentation. A summary of Staff findings are listed below:

- A number of service line pressure test records and as built records were observed to have hand written additions to correct missing information on project documentation received from the field.
- Staff identified a number of instances where DEOG procedures and/or project plans were not followed, although the work performed in the field met the minimum requirements of the Pipeline Safety Regulations (49 CFR 192).
- Approximately 1/3<sup>rd</sup> of the project folders reviewed by Staff were missing as built and pressure test information for mains and service lines, and had to be located by DEOG staff.
- Information recorded by DEOG construction inspectors on as-built forms for service lines and mains have no consistency. Some record all components (valves, tees, etc.) installed on the pipeline while some record only information about the pipe.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion East Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response. Staff recommends that DEOG perform a review of their quality assurance and quality control processes for documenting new construction to ensure pipeline construction done in accordance with DEOG procedures, and that records associated with new construction are complete and easily accessible.

Please respond to this Notice within 30 days from the date of this letter. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan. You may contact me at (614) 644-8983 or via e-mail at [peter.chace@puco.ohio.gov](mailto:peter.chace@puco.ohio.gov) with any questions. Sincerely:

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to	<u>Jeffrey A. Murphy</u>	Title	<u>Vice President</u>
Operator	<u>Dominion East Ohio</u>		
Address	<u>1201 E. 55<sup>th</sup> Street P.O. Box 5759</u>		
City	<u>Cleveland</u>	State	<u>OH</u> Zip Code <u>44101-0759</u>
Date of Inspection	<u>January 16-24, 2017</u>	Place of Inspection	<u>320 Springside Drive, Akron</u>
GPS Inspector	<u>Chris Domonkos, Mary McKelvey, Dave Price, Jeff Polka, Keith Topovski</u>		

**DESCRIPTION**

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

- |                                   |  |
|-----------------------------------|--|
| (1) Section 192.13 (49 C.F.R.);   | Title: What general requirements apply to pipelines regulated under this part? |
| (2) Section 192.241 (49 C.F.R.);  | Title: Inspection and test of welds  |
| (3) Section 192.383 (49 C.F.R.);  | Title: Excess flow valve installation  |
| (4) Section 192.517 (49 C.F.R.);  | Title: Records   |
| (5) Section 192.1007 (49 C.F.R.); | Title: What are the required elements of an integrity management program?      |

**Describe Probable Noncompliance**

- 192.13**      *What general requirements apply to pipelines regulated under this part?*  
*(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*

**Dominion East Ohio Gas (DEOG) installed 2" service lines at 4644 Warner Road, Garfield Heights and 80 Whitehall Drive, Tallmadge by performing a 10 minute pressure test instead of the 60 minute test required by DEOG Standard Operating Procedure 290: Pressure Testing. Staff notes that DEOG has been cited for this violation twice previously, on December 26, 2013 (Canton shop) and January 16, 2015 (Northeast shop). The test performed meets the minimum requirements of 49 CFR 192, Subpart J "Test Requirements", however DEOG's consistent inability to follow this procedure leads Staff to question the effectiveness of DEOG's Operator Qualifications and quality control programs.**

**DEOG's Construction Manual, section 10.1(K) requires a tracer wire continuity test to be performed and documented prior to service lines being placed into service. DEOG's current Service Line form does not document this test, and there is no way to determine whether this test was or was not performed by reviewing construction documentation.**

**Two projects reviewed used pre-fabricated GM&R stations that were required by the project plans to have connecting welds nondestructively tested (P400049963-GM Lordstown East, P400072499 – Millennium Inorganic Chemicals). The nondestructive testing was either not performed or documentation of the nondestructive testing cannot be located.**

**Project number 400008489 (E 80th Street) shows 39 re-ties and 1 replacement service line were pressure tested from the main to the curb valve while the portion of the service line from the curb valve to the meter was not. DEOG SOP Section 12 "Design and Construction"**

states testing is required for service lines previously reinstated or returned to service after temporary disconnection.

192.241

*Inspection and test of welds*

*(a) Visual inspection of welding must be conducted by an individual qualified by appropriate training and experience to ensure that:*

- (1) The welding is performed in accordance with the welding procedure; and*
- (2) The weld is acceptable under paragraph (c) of this section.*

**Welding inspection reports do not contain information regarding the welding procedure used, whether or not a weld was visually inspected by an individual qualified by appropriate training and experience, or what criteria was used to determine the acceptability of the weld. DEOG procedures for Nondestructive Testing state “When a weld is not nondestructively tested, the weld shall be visually inspected by a qualified welding inspector and documented as such”.**

192.383

*Excess flow valve installation.*

*(b) Installation required. An excess flow valve (EFV) installation must comply with the performance standards in § 192.381. The operator must install an EFV on any new or replaced service line serving a single-family residence after February 12, 2010, unless one or more of the following conditions is present:*

- (1) The service line does not operate at a pressure of 10 psig or greater throughout the year;*
- (2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence;*
- (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or*
- (4) An EFV meeting performance standards in § 192.381 is not commercially available to the operator.*

**Project # P400111854-PID97481 ATB-20-3 92 Culvert Replacement had 14 service lines installed without excess flow valves. All 14 addresses were single meter residential services.**

192.517

*Records*

*(b) Each operator must maintain a record of each test required by §§192.509, 192.511, and 192.513 for at least 5 years.*

**Several projects reviewed during Staff's inspection did not document curb to meter service line tests. As an example, Project #P400034550 – Woodrow & Pittsburgh showed a total of 362 new service lines installed. The project folder contained Service Construction Detail documents for 233 new service lines. These documents did not have main to curb test data typed on the form by the applicable inspector, instead “m/c air tested @ 90# for 60 min” was hand written on the documents. This hand written information appears to have been written by the same person and added in after the documents were submitted from the field. An additional set of 129 Service Construction Detail documents for new service line construction were located for this project in another construction folder, these forms contained no main to curb test data and did not have a hand written note. This leads Staff to conclude that main to curb testing did not take place for these 129 new services.**



A service line was noted on the W. 82nd project - PIR 335 (8108 Denison Ave Unit D) - tap ID 210039257. The documented service line and main to curb were pressure tested at 60 psig for 10 minutes. DEOG SOP Design and Construction Section 12 (12.9 – B) states the minimum shall be 90 psig. A service line located at 2715 Berkshire Rd., Cleveland Heights did not have a main to curb pressure test.

192.1007

*What are the required elements of an integrity management program?*

*(a) Knowledge. An operator must demonstrate an understanding of its gas distribution system developed from reasonably available information.*

*(5) Provide for the capture and retention of data on any new pipeline installed. The data must include at a minimum, the location where the new pipeline is installed and the material of which it is constructed.*

The coupling used to connect PE buried service line to a customer internal meter set is not documented on the DEOG Service Construction Detail form. The coupling is a mechanical stab fitting that transitions the PE pipe to a steel fitting that is then connected to the inside meter set.



**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

June 28, 2017

Jeff Murphy, Vice President  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, OH 44101-0759

Mr. Murphy:

On 05/02/17-05/26/17, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Northeast, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

The inspection also noted continuing issues with right-of-way clearance, line markers at public road and railway crossings, identification and remediation of atmospheric corrosion, and establishing electrical isolation of cased piping. These issues are being addressed through other Notices of Probable Noncompliance and are not addressed here.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jeff Murphy Title Vice President  
Operator Dominion Energy Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State OH Zip Code 44101-0759  
Date of Inspection 05/02/17-05/26/17 Place of Inspection Northeast  
GPS Inspector Chris Domonkos

**DESCRIPTION**

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

Section 192.805(b) (49 C.F.R.); Title: Qualification program.

**Describe Probable Noncompliance**

**192.805            Qualification program.**  
**(b) Ensure through evaluation that individuals performing covered tasks are qualified**

DEO has employed a field operator (Brian James Henry) in the Measurement and Regulation role since 2014 and has not ensured through evaluation that this individual is qualified. This individual appears to have no current documented Operator Qualifications for any covered task whatsoever. Staff identified 47 individual regulator stations inspected by the field operator in question at DEO's Northeast operating center and an additional 47 at the Lakeshore operating center without current Operator Qualifications. According to DEO's training department, monthly reports are sent to supervisors for review, yet this field employee was not identified as missing the required training to operate in his current role. The following OQ covered tasks are required for field operators employed in the Measurement and Regulation role:

- OPQ-Q-00401 Corrosion Monitoring – Atmospheric, External and Internal
- OPQ-Q-00402 Coating Maintenance
- OPQ-Q-00701 Locating, Installing and Protecting Customer Meters and Regulators
- OPQ-Q-00702 Customer Pressure Regulating, Limiting, and Relief Devices – Operation & Maintenance
- OPQ-Q-01404 Casing Vents and Seals
- OPQ-Q-01414 Pipeline Shutdown, Startup or Pressure Change
- OPQ-Q-01415 Protection from Hazards
- OPQ-Q-01418 Purging
- OPQ-Q-01427 Valve Maintenance
- OPQ-Q-01501 Odorization – Mains and Transmission Lines
- OPQ-Q-01802 Vault Maintenance
- OPQ-Q-01803 Pressure Regulating, Limiting and Relief Devices – Operation and Maintenance
- OPQ-Q-02011 Prevention of Accidental Ignition
- OPQ-Q-00001 Abnormal Operating Conditions

According to Dominion East Ohio's response to a Notice of Probable Noncompliance issued for an inspection at the Marietta operating center dated January 24, 2014, DEO was to require every supervisor to review their employees' current job titles and ensure that each employee is properly qualified, has the appropriate role assigned, and are timely evaluated for requalification. The Staff recommends that covered tasks performed by this employee be re-evaluated to ensure they have been properly performed in accordance with DEO procedures.

A Dominion Energy Ohio (DEO) leak detection employee failed to properly grade a potential leak during the field portion of the inspection. The employee identified gas at the parts per million using a Bascom-Turner Rover unit in survey mode, yet failed to properly pinpoint and grade the leak through bar holing as required by DEO's covered task "1202: Outside Leakage, Investigation, Pinpointing and Grading". Further investigation also revealed the Dominion East Ohio Operator Qualification program does not have equipment-specific training for the use of the Bascom-Turner leak detector. The Staff recommends that DEO review their leak grading procedures with all personnel to ensure that leaks are being graded properly to accurately determine whether or not they are hazardous, and that equipment specific training for all leak detection equipment used by DEO be added to your Operator Qualification training program. The Staff further notes that a similar violation was identified at DEO's Canton Perry Yard operating center on December 26, 2013.

Two separate DEO employees failed to recognize and report a leak on a Transmission system critical valve (number 9519) on two separate occasions during the inspection. Staff observed the leak on the valve during an observation of a cathodic protection (CP) test point read on 5/16/17, and again during an observation of a critical valve inspection on 5/19/17. Both DEO employees observed failed to recognize or report the leak. The Staff recommends evaluating training standards for leak detection and leak grading and retraining the Gas Measurement and Regulation and the Corrosion Department staff at the Northeast office.

DEO employees failed to identify active atmospheric corrosion during the 2015 and 2016 annual inspections of three Gas Measurement and Regulating stations and one commercial meter set that was observed by Staff during the inspection. These stations are:

- Regulator station LS-845 Eddy Rd. & St. Clair Ave. in Cleveland
- Regulator station LS-1128 Oberon – E. Erie St. in Painesville
- Farm tap LS-1251 Parker Ct.
- Commercial meter located at 830 E. Erie Street in Painesville.

The Staff recommends evaluating training standards for recognizing atmospheric corrosion and retraining the Gas Measurement and Regulation staff at the Northeast office. The Staff further notes that a similar violation was identified at DEO's Youngstown operating center on November 23, 2016.





**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

August 10, 2017

Mr. Jeffrey A. Murphy, Vice President & General Manager  
Dominion Energy Ohio  
1201 E. 55th Street  
Cleveland, OH 44103

Mr. Murphy:

On June 1 - July 11, 2017, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Western Shop, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Mr. Jeffrey A. Murphy Title Vice President & General Manager  
Operator Dominion Energy Ohio  
Address 1201 E. 55th Street  
City Cleveland State OH Zip Code 44103  
Date of Inspection June 1 - July 11, 2017 Place of Inspection Western Shop  
GPS Inspector Mary McKelvey

**DESCRIPTION**

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

- (1) Section 192.13(c) (49 C.F.R.); Title: What general requirements apply to pipelines regulated under this part?
- (2) Section 192.805(c) (49 C.F.R.); Title: Qualification program
- (3) Section 192.807(b) (49 C.F.R.); Title: Recordkeeping
- (4) Section 192.809(e) (49 C.F.R.); Title: General

**Describe Probable Noncompliance**

**192.13**      *What general requirements apply to pipelines regulated under this part?*  
*(c) Each Operator shall maintain, modify as appropriate, and follow the plans procedures, and programs that is required to establish under this part.*

Dominion Energy Ohio (DEO) identified a leak found at 14022 Birchwood in Cleveland (leak number 400213121) on a fiberglass main. This leak was repaired by replacing the damaged segment with plastic pipe using a 3" Mueller 500 Series clamp. DEO's Matrix guidelines for repairs states "in case of pipeline replacement projects, if a tie-in point is found to be connected to fiberglass they will extend the project to include the removal/replacement of the fiberglass". The undamaged portion of the fiberglass piping was left in service. DEO's Matrix guidelines for repairs also specifies that the Mueller clamp used is permitted for a temporary repair only. Finally, DEO procedures require the Mueller Clamp should have been tested at 90 psig for 10 minutes prior to tapping which was not done in this instance. Staff recommends replacing the fiberglass piping at 14022 Birchwood and reviewing the qualifications of the employees or contractors and the DEO construction inspectors assigned to the project.

**192.805**      *Qualification program*  
*Each operator shall have and follow a written qualification program. The program shall include provisions to:*  
*(c) Ensure through evaluation that individuals performing covered tasks are qualified*

The individual who performed the repair on the fiberglass main at 14022 Birchwood in Cleveland on 8/15/2016 was last trained for the covered task GDO-CM-CI&FGLASS – Cast Iron & Fiberglass procedures and Leak Repair on 6/11/2013. The DEO Operator Qualification Program (page 2) states, "There are several specially covered



task that are not included in the standard set of Roles. Performance on these covered task has either been restricted to a few employees, or the task is seldom performed. In either case, Employees must be qualified prior to performance of these tasks.” The Operator Qualification plan does not define what period of time between qualification and performance of the task is acceptable but it is Staff’s position that greater than three years may be too long. Staff recommends DEO’s Operator Qualification plan more clearly define qualification standards for tasks not included in the standard set of Roles.

DEO’s written qualification program only identifies generic abnormal operating conditions (AOCs) taken from the ASME B31Q-2006 generic abnormal operating conditions (AOC) list. Task specific AOCs for each covered task are not identified. DEO must review their qualification program and identify AOC’s that are specific to each covered task.

DEO uses the ASME B31Q-2006 covered task 1211 “Odorization” for their employees and contractors. This covered task does not address the proper operation and maintenance of an odorometer. The PUCO has cited DEO for violations associated with a lack of training on the use of an odorometer previously on 8/6/15 (Youngstown) and 5/19/16 (Lakeshore). Staff recommends inclusion of instructions regarding how to use an odorometer as part of the Odorization covered task.

**192.807**      *Recordkeeping*

*Each operator shall maintain records that demonstrate compliance with this subpart.*

*(b) Records supporting an individual’s current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.*

DEO’s Operator Qualification Program Section 1 – Qualification Evaluation and Intervals states “Note that an on-the-job observation / performance evaluation of successful completion of a covered task can be substituted for any of the recommended methods”. DEO was unable to provide any documents supporting a current qualification status in instances where an on-the-job evaluation method was used as the sole method of qualifying an individual to complete a covered task.

**192.809**      *General*

*(e) After December 16, 2004, observation of on-the-job performance may not be used as the sole method of evaluation.*

DEO’s Operator Qualification Program Section 1 – Qualification Evaluation and Intervals states “Note that an on-the-job observation / performance evaluation of successful completion of a covered task can be substituted for any of the recommended methods”. This language conflicts with the Pipeline Safety Regulations. DEO must change their Operator Qualification Program plan to comply with this section of the Pipeline Safety Regulations and arrange to requalify personnel where the observation of on-the-job performance was used as the sole method of qualifying an individual to perform a covered task.



**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

September 20, 2017

Jeff Murphy, Vice President  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, OH 44101-0759

Mr. Murphy:

On 07/10/17-08/08/17, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at the North Canton Transmission & Storage operating center, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

Staff notes that the violations described in this Notice are repeat violations. Similar violations of the Pipeline Safety Regulations, 49 CFR 192.467 were identified by Staff in 2012 at North Canton, in 2014 at the Western operating center, and in 2016 at the Eastern (Randall) operating center. Past corrective action proposed by Dominion Energy Ohio has either not been implemented or has proven to be ineffective. My expectation is that Dominion Energy Ohio will re-evaluate past corrective action proposals and propose something more likely to obtain compliance with the Pipeline Safety Regulations.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

180 East Broad Street  
Columbus, Ohio 43215-3793

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**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jeff Murphy Title Vice President  
Operator Dominion Energy Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State OH Zip Code 44101-0759  
Date of Inspection 07/10/17-07/20/17 Place of Inspection North Canton  
GPS Inspector Dennis Cramer, Chris Domonkos, Victor Omameh

**DESCRIPTION**

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

- (1) Section 192.13(c) (49 C.F.R.); Title: What general requirements apply to pipelines regulated under this part?
- (2) Section 192.467(c) (49 C.F.R.); Title: External corrosion control: Electrical isolation
- (3) Section 192.705 (49 C.F.R.); Title: Transmission lines: Patrolling

**Describe Probable Noncompliance**

**192.13**            **What general requirements apply to pipelines regulated under this part?**  
**(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.**

Dominion Energy Ohio (DEO) Standard Operating Procedure 70.08 "Corrosion Control – Monitoring Cathodic Protection Levels" requires prompt remedial measures to correct any deficiencies indicated by required monitoring. DEO did not take or plan any remedial action for six cased pipeline segments where monitoring indicated the cased pipeline segments may not have been electrically isolated from the associated casing.

DEO Standard Operating Procedure 70.11 "Corrosion Control – Monitoring and Isolating Encased Crossings" requires remedial action for identified shorted cased segments before the next inspection cycle (annually, not to exceed 15 months). DEO did not take or plan any remedial action for six cased pipeline segments where monitoring indicated the cased pipeline segments may not have been electrically isolated from the associated casing.

**192.467**            **Electrical corrosion control: Electrical isolation**  
**(c) Except for unprotected copper inserted into ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing.**  
**(d) Inspection and electrical tests must be made to assure that electrical isolation is adequate.**

DEOG failed to identify and remediate six (6) separate casings for electrical isolation within the North Canton Storage Field operating area. DEO criteria for a potentially shorted cased pipeline segment is that the electrical

potential of the carrier pipe and the associated casing are within 0.05v. The operator also failed to follow their Operating and Maintenance plan section 70.08-Corrosion Control Monitoring Cathodic Protection; and 70.09-Corrosion Control Electrical Isolation. The following cased pipeline segments were identified by the Gas Pipeline Safety Section Staff (Staff) as being potentially electrically shorted to its associated metallic casing with no corrective action taken by DEO to minimize corrosion of the pipeline inside the casing:

Unit	Zone	Type	Pipe	Address	Voltage Reading	Date Read
750.01	S11G	TS 31	SP-6950 (pipe)	GALEHOUSE & BK DIA	1.58	3/12/15
750.09	S11G	TS 31	C-6950 (casing)	GALEHOUSE & BK DIA	1.58	3/12/15
750.01	S11G	TS 31	SP-6950 (pipe)	GALEHOUSE & BK DIA	1.39	2/1/16
750.09	S11G	TS 31	C-6950 (casing)	GALEHOUSE & BK DIA	1.46	2/1/16
750.01	S11G	TS 31	SP-6950 (pipe)	GALEHOUSE & BK DIA	2.40	2/9/17
750.09	S11G	TS 31	C-6950 (casing)	GALEHOUSE & BK DIA	2.40	2/9/17

No documented action was taken by DEO to assess or remediate the cased piping segment.

Unit	Zone	Type	Pipe	Address	Voltage Reading	Date Read
300.01	S11G	TS 31	SP-3300 (pipe)	FRAZE AND WILLIAM	1.40	3/11/15
300.09	S11G	TS 31	C-3300 (casing)	FRAZE AND WILLIAM	1.35	3/11/15
300.01	S11G	TS 31	SP-3300 (pipe)	FRAZE AND WILLIAM	1.32	1/26/16
300.09	S11G	TS 31	C-3300 (casing)	FRAZE AND WILLIAM	1.32	1/26/16
300.01	S11G	TS 31	SP-3300 (pipe)	FRAZE AND WILLIAM	1.38	1/26/17
300.09	S11G	TS 31	C-3300 (casing)	FRAZE AND WILLIAM	0.97	1/26/17

The carrier pipe was read on the west side of Frazee Road in 2017 while the casing was read on the east side, making the reading invalid for the purpose of comparison with the carrier pipe read to determine a shorted condition. No documented action was taken by DEO to assess or remediate the cased piping segment.

Unit	Zone	Type	Pipe	Address	Voltage Reading	Date Read
885.01	S8G	TS 31	SP-2183 (pipe)	ES ARLINGTON	1.23	2/4/15
885.09	S8G	TS 31	C-2183 (casing)	ES ARLINGTON	1.23	2/4/15
885.01	S8G	TS 31	SP-2183 (pipe)	ES ARLINGTON	1.18	1/28/16
885.09	S8G	TS 31	C-2183 (casing)	ES ARLINGTON	1.18	1/28/16



885.01	S8G	TS 31	SP-2183 (pipe)	ES ARLINGTON	1.34	1/26/17
885.09	S8G	TS 31	C-2183 (casing)	ES ARLINGTON	1.22	1/26/17

No documented action was taken by DEO to assess or remediate the cased piping segment.

Unit	Zone	Type	Pipe	Address	Voltage Reading	Date Read
18.1	S8G	TS 31	TP-0 (pipe)	ST RT 261	1.08	3/23/15
18.9	S8G	CURB	C-259 (casing)	ST RT 261	1.04	3/23/15
18.1	S8G	TS 31	TP-0 (pipe)	ST RT 261	0.96	3/16/16
18.9	S8G	CURB	C-259 (casing)	ST RT 261	0.95	3/16/16
18.1	S8G	TS 31	TP-0 (pipe)	ST RT 261	1.05	3/30/17
18.9	S8G	CURB	C-259 (casing)	ST RT 261	1.02	3/30/17

No documented action was taken by DEO to assess or remediate the cased piping segment.

Unit	Zone	Type	Pipe	Address	Voltage Reading	Date Read
1220.01	S10G	TS 31	SP-3933 (pipe)	W/LN #3933 KEPLER	1.40	2/24/15
1220.09	S10G	TS 31	C-3933 (casing)	W/LN #3933 KEPLER	1.41	2/24/15
1220.01	S10G	TS 31	SP-3933 (pipe)	W/LN #3933 KEPLER	1.21	2/25/16
1220.09	S10G	TS 31	C-3933 (casing)	W/LN #3933 KEPLER	1.38	2/25/16
1220.01	S10G	TS 31	SP-3933 (pipe)	W/LN #3933 KEPLER	1.25	2/20/17
1220.09	S10G	TS 31	C-3933 (casing)	W/LN #3933 KEPLER	1.25	2/20/17

No documented action was taken by DEO to assess or remediate the cased piping segment.

Unit	Zone	Type	Pipe	Address	Voltage Reading	Date Read
2260.01	S11G	TS 31	SP-1751 (pipe)	WARWICK-PORR RD	1.44	3/17/15
2260.01	S11G	TS 31	C-1751 (casing)	WARWICK-PORR RD	1.21	3/17/15
2260.01	S11G	TS 31	SP-1751 (pipe)	WARWICK-PORR RD	1.38	1/29/16
2260.01	S11G	TS 31	C-1751 (casing)	WARWICK-PORR RD	1.33	1/29/16
2260.01	S11G	TS 31	SP-1751 (pipe)	WARWICK-PORR RD	1.18	2/1/17
2260.01	S11G	TS 31	C-1751 (casing)	WARWICK-PORR RD	1.18	2/1/17

No documented action was taken by DEO to assess or remediate the cased piping segment.

Staff has previously cited DEO for failure to assure electrical isolation between piping and metallic casings at the North Canton storage field on July 25, 2012. DEO and Staff agreed to the following on March 5, 2013 as part of a resolution of the North Canton citation:

"As part of encased transmission pipe cathodic protection monitoring DEO agrees to:

- Incorporate into the Company's Cathodic Protection Monitoring System, (CPMS), cathodic protection reads on the casings of the identified approximate 800 encased transmission pipes.
- Compare the cathodic protection casing readings to the readings on the carrier pipe to determine if further investigation is necessary to establish if the casing is shorted to the carrier pipe."

Since the time of this agreement Staff has cited DEO an additional two times for failure to carry out this agreement. On September 30, 2014 Staff cited DEO for failure to inspect or test three cased segments along DEO line TPL-8 to assure electrical isolation as a result of an inspection at the DEO Western inspection unit. On September 21, 2016 Staff cited DEO for failure to correct or take other measures to minimize corrosion for two shorted Transmission casings on DEO lines 258 and 259 as a result of an inspection at the DEO Eastern (Randall) inspection unit.

Note that the six (6) potentially shorted cased pipeline segments were identified by Staff during the pipeline safety inspection and not by DEO personnel. Also note that the DEO personnel at the North Canton inspection unit admitted to Staff that they do not review test point data for evidence of casing shorts and that they were unaware of the shorted condition of these cased segments. Action to clear a shorted casing or take other measures to minimize corrosion are required to prevent localized corrosion of the carrier pipe that may lead to pipeline failure.

**192.705      Transmission Lines: Patrolling**

**(a) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.**

DEO continues to use aerial patrol for storage field lines which is an ineffective method of patrol due to canopy cover and overgrowth as a result of a failure to maintain the pipeline right-of-way (ROW). Several encroachments of the ROW were also viewed by Staff during the inspection. DEO has developed a ROW Maintenance Program as a result of several violations previously cited by Staff for failure to adequately patrol Transmission lines in the DEO system. The ROW Maintenance program does not appear to cover piping transporting gas within the North Canton Storage Field. DEO needs to revise the ROW Maintenance Program to include ROW clearing methods and additional foot patrols for pipelines transporting gas within the storage field.





**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

October 18, 2017

Jim Eck, Vice President of Distribution Operations  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44103

Mr. Eck:

On September 22, 2017, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Marietta, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jim Eck Title Vice President of Distribution Operations  
Operator Dominion Energy Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State Ohio Zip Code 44103  
Date of Inspection September 22, 2017 Place of Inspection 98 Starlite Drive, Marietta, Ohio 45750  
GPS Inspector Dennis A. Cramer

**DESCRIPTION**

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

- |                                  |  |
|----------------------------------|--|
| (1) Section 192.321 (49 C.F.R.); | Title: Installation of plastic pipe            |
| (2) Section 192.383 (49 C.F.R.); | Title: Excess flow valve installation          |
| (3) Section 192.479 (49 C.F.R.); | Title: Atmospheric corrosion control: General  |
| (4) Section 192.513 (49 C.F.R.); | Title: Test requirements for plastic pipelines |
| (5) Section 192.721 (49 C.F.R.); | Title: Distribution systems: Patrolling        |

**Describe Probable Noncompliance**

**192.321 Installation of plastic pipe**

**(a) Plastic pipe must be installed below ground level except as provided by paragraphs (g) and (h) of this section.**

**(g) Uncased plastic pipe may be temporarily installed above ground level under the following conditions:**

**(1) The operator must be able to demonstrate that the cumulative above-ground exposure of the pipe does not exceed the manufacturer's period of exposure or two years, whichever is less.**

Twelve plastic pipe segments were identified during the inspection where documented above-ground exposure of the pipe has exceeded two years:

- Exposure # 13 at Blue Knob Rd. Line # L-27787
- Exposure # 22 at 1378 Way Rd. Line # L-27787
- Exposure # 33 at County Road 3 Line # L-27787
- Exposure # 89 at Drag Strip Rd. Line # L-27787
- Exposure # 90 at Degussa Line # L-27788
- Exposure # 120 at 2870 Bare Run Rd. Line # RM-219
- Exposure # 121 at 165 Zimmer Rd. Line # RL-200. The line also has a large area of land slip, pipe is stressed
- Exposure # 138 at Eagles Pavilion Line # RM-574
- Exposure # 144 at Ash Road / Oak Grove Line # RM-544
- Exposure # 145 at 1240 Ash Road Line # RM-544
- Exposure # 162 at Drag Strip Rd. and St. Rt. 50 Line # L-27787
- Exposure # 163 at 700' North of House 333 Ash Rd. Line # RM-689



**192.383 Excess flow valve installation**

**(b) Installation required.** An excess flow valve (EFV) installation must comply with the performance standard in 192.381. The operator must install an EFV on any new or replaced service line serving a single-family residence after February 12, 2010, unless one or more of the following conditions is present:

- (1) The service line does not operate at a pressure of 10 psig or greater throughout the year;**
- (2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence;**
- (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing down a line; or**
- (4) An EFV meeting performance standards in 192.321 is not commercially available to the operator.**

The Dominion Energy Ohio (DEO) Marietta operating center is not installing EFV's for any customers due to a stated concern of liquid in the pipelines. DEO was unable to provide any records indicating which services have had prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence. There are some areas in the Marietta operating system that are supplied by local production, however the majority of the system appears to be supplied with transmission quality gas where none of the exceptions provided in 192.383(b) apply. DEO must determine how many services require an EFV installation under 49 CFR 192.383 at the Marietta operating center but were not installed, determine how many services qualify for the 49 CFR 192.383(b) installation exemptions by documented issues with fluid in the gas stream (such as outage or re-light records, demonstrated requirements for drips, etc.), and install EFV's on the remaining services.

**192.479 Atmospheric corrosion control: General**

**(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.**

Seven exposed bare steel pipeline segments were identified during the inspection that are not coated:

- Exposure # 38 at 2291 Blue Knob Rd. County Rd. 10 Line # FS-8
- Exposure # 86 at 200' South of Briggs Hill Rd. Line # RT-32
- Exposure # 103-B at Devoe Ridge Line # RM-557
- Exposure # 109 at Maple & Bellvue Line # RL-408
- Exposure # 118 at 11965 Route 26 Line # RL-83
- Exposure # 146 Behind House @ 40911 St. Rt. 7 Line # RL-189
- Exposure # 148 at Gravel Bank Road Line # RT-32

**192.513 Test requirements for plastic pipelines**

**(a) Each segment of a plastic pipeline must be tested in accordance with this section.**

DEO was unable to provide pressure test documentation for the following 3 service lines installed over 2015-2016.

- 22 Acme St. Marietta, Ohio notification # 400166388
- 12512 State Route 550, Marietta, Ohio notification # 400169573
- 152 Elizabeth St., Powhatan Point, Ohio notification # 400200434

**192.721 Distribution systems: Patrolling**

**(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled –**

**(2) Outside business districts, at intervals not exceeding 7 ½ months, but at least twice each calendar year.**

The DEO Marietta operating office has a large number of exposed pipeline segments where anticipated physical movement or external loading could cause failure or leakage. Commission Staff discovered 74 instances where required patrolling of exposed pipeline segments were not performed at least twice each calendar year, at intervals not exceeding 7 ½ months. Two patrols were missed in CY 2015, 66 were missed in CY 2016, and 8 in CY 2017. DEO must conduct an internal investigation to determine why required patrolling is not being performed, take action to bring their patrolling schedule back into compliance with the Pipeline Safety Regulations, and take immediate action to remediate piping where atmospheric corrosion is found or on piping of relatively high risk from outside force damage. Note that DEO was previously cited for violations of this code section in 2014, and cited for violations related to the remediation of exposed pipeline segments in 2010, 2012, 2013 and 2014.





**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

November 9, 2017

Jim Eck, Vice President and General Manager  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44103

Mr. Eck:

On October 16-19, 2017, a representative of the Public Utilities Commission of Ohio conducted an Integrity Management pipeline safety inspection, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jim Eck Title Vice President and General Manager  
Operator Dominion Energy Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State Ohio Zip Code 44103  
Date of Inspection October 16-19, 2017 Type of Inspection Integrity Management  
GPS Inspectors Victor Oameh and Chris Domonkos

**DESCRIPTION**

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

- (1) Section 192.343 (49 C.F.R.); Title: Nondestructive Testing
- (2) Section 192.805 (49 C.F.R.); Title: Qualification Program
- (3) Section 192.941 (49 C.F.R.); Title: What is a low stress reassessment?

**Describe Probable Noncompliance**

- 192.243 Nondestructive Testing**
- (a) Nondestructive testing of welds must be performed by any process, other than trepanning, that will clearly indicate defects that may affect the integrity of the weld.
  - (b) Nondestructive testing of welds must be performed:
    - (1) In accordance with written procedures; and
    - (2) By persons who have been trained and qualified in the established procedures and with the equipment employed in testing.
  - (c) Procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under 192.241(c).
  - (d) When nondestructive testing is required under § 192.241(b), the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference:
    - (1) In Class 1 locations, except offshore, at least 10 percent.
    - (2) In Class 2 locations, at least 15 percent.
    - (3) In Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100 percent unless impracticable, in which case at least 90 percent. Nondestructive testing must be impracticable for each girth weld not tested.
    - (4) At pipeline tie-ins, including tie-ins of replacement sections, 100 percent.
  - (e) Except for a welder or welding operator whose work is isolated from the principal welding activity, a sample of each welder or welding operator's work for each day must be nondestructively tested, when nondestructive testing is required under 192.241(b).
  - (f) When nondestructive testing is required under 192.241(b), each operator must retain, for the life of the pipeline, a record showing by milepost, engineering station, or by geographic feature, the number of girth welds made, the number nondestructively tested, the number rejected, and the disposition of the rejects.



*Dominion Energy Ohio was unable to demonstrate required nondestructive testing of any welds were performed for the following construction projects:*

- *P400132142 (CWO#63379588), Contractor: Red Dirt*
- *Ohimp.stor.ptest.L#3735 Contractor: C-Pro Development*
- *Ohimp.stor.ptest.L#4062 Contractor: C-Pro Development*

**192.805**

**Qualification Program**

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

**(b) Ensure through evaluation that individuals performing covered tasks are qualified**

*Dominion Energy Ohio was unable to demonstrate contractors performing anomaly assessment and repair, nondestructive testing of welds, and pressure testing were qualified for any of the projects reviewed during the inspection. DEO does not record the identity of the contractors performing this work so it is not possible to determine whether or not the individuals performing covered tasks were qualified under DEO's Operator Qualification (OQ) plan. The projects reviewed were:*

- *P400132142 (CWO#63379588);*
- *P400137055 (CWO#63305291);*
- *Ohimp.stor.ptest.L#3735;*
- *Ohimp.stor.ptest.L#4062;*
- *TPL 3N - L#203H/M, ILI Run and Dig Information/Anomaly Assessment or repair;*
- *Storage line - L#1860/M, ILI Run and Dig Information/Anomaly Assessment or repair;*
- *TPL 13N - L#259B/M ILI, Run and Dig Information/Anomaly Assessment or repair;*
- *L#207B/M, ILI Run and Dig Information/Anomaly Assessment or repair.*

*Dominion Energy Ohio records show construction inspector William Fussaro signed to approve radiographic testing of welds on project P400137055 (CWO #63305291), however DEO's Veriforce database does not have any record of inspector Fussaro being qualified to perform task 0601-NDT-Radiographic Testing. Staff believes the cited 192.805 violations show that a review of the operator qualification status of employees and contractors performing covered tasks is not being performed prior to starting work.*

*DEO states they accept a certification given under the American Society for Nondestructive Testing (ASNT) standard SNT-TC-1A "Personnel Qualification and Certification in Nondestructive Testing" to qualify individuals to perform nondestructive testing of welds. DEO was unable to demonstrate that they have reviewed and approved training materials used by contractors to qualify under the ASNT standard and if these qualification standards meet DEO Standard Operating Procedures (SOP).*

**What is a low stress reassessment?**

**(c) Internal Corrosion.** To address the threat of internal corrosion on a covered segment, an operator must –

- (1) Conduct a gas analysis for corrosive agents at least once each calendar year;**
- (2) Conduct periodic testing of fluids removed from the segment. At least once each calendar year test the fluids removed from each storage field that may affect a covered segment; and**
- (3) At least once every seven (7) years, integrate data from the analysis and testing required by paragraphs (c)(1) and (c)(2) with applicable internal corrosion leak records, incident reports, repair records, patrol records, exposed pipe reports, and test records, and define and implement appropriate remediation activities.**

*The majority of transmission lines covered by low stress reassessment do not have gas and liquid samples analysis records. DEO was unable to demonstrate they have integrated gas and liquid test data with applicable internal corrosion leak records, incident reports, repair records, patrol records, exposed pipe reports, and test records at least once every 7 years to make determination if remediation is necessary.*





**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

April 17, 2018

Jim Eck, Vice President and General Manager  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44103

Mr. Eck:

Between February 12<sup>th</sup> and 23<sup>rd</sup> 2018, representatives of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of Dominion Energy Ohio (DEO) procedures and records pursuant to Section 4905.91(B) of the Ohio Revised Code. As a result of the inspection and in accordance with Ohio Adm. Code 4901:1-16-09, the Staff has issued the following Notice of Probable Noncompliance to DEO for review. A written response is expected within 30 days. Please consider the response as your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

Staff identified three (3) DEO contractors who performed plastic fusions and other covered tasks without current operator qualifications. Staff expects DEO to identify the scope of the work performed by all individuals without qualifications and have those covered tasks performed again with qualified personnel. Please provide target dates for identifying and completing this work in your response.

Staff also determined DEO has demonstrated a lack of institutional control over its Drug and Alcohol testing program. Records related to drug and alcohol testing required by 49 C.F.R. 199, were unavailable for review by PUCO inspectors. Those records that were available did not support the random testing rates reported by DEO to the Office of Pipeline Safety. Further, the individuals performing defined functions described in 49 C.F.R. 199 either could not be identified or did not meet continuing education requirements. Staff investigation also determined that those employees who failed random drug testing were not immediately removed from duty and did not complete education and/or treatment plans prior to returning to duty. Staff intends to perform a complete inspection of the DEO Drug and Alcohol program early in 2019 to determine if these issues have been corrected.

Staff expects DEO to identify any covered tasks that were performed by DEO employees or contractors after failing their random drug testing and prior to completion of education and/or treatment programs. Those covered tasks will be performed again with qualified personnel. Please provide target dates for identifying and correcting these tasks in your response.

Please provide your response within 30 days from the date of this letter. If you need more information you may contact me at (614) 644-8983 or via e-mail at [peter.chace@puco.ohio.gov](mailto:peter.chace@puco.ohio.gov).

Sincerely,



Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to	<u>Jim Eck</u>	Title	<u>Vice President</u>
Operator	<u>Dominion Energy Ohio</u>		
Address	<u>1201 East 55<sup>th</sup> Street</u>		
City	<u>Cleveland</u>	State	<u>Ohio</u> Zip Code <u>44103</u>
Date of Inspection	<u>02/12/2018 – 02/23/2018</u>	Place of Inspection	<u>418 E. Hines Rd., Boston Hts.</u>
GPS Inspector	<u>Chris Domonkos, Mary McKelvey, Keith Topovski</u>		

**DESCRIPTION**

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

- |                      |              |  |
|----------------------|--------------|--|
| (1) Section 40.15    | (49 C.F.R.); | Title: May an employer use a service agent to meet DOT testing requirements?   |
| (2) Section 40.281   | (49 C.F.R.); | Title: Who is qualified to act as a SAP?                                       |
| (3) Section 192.13   | (49 C.F.R.); | Title: What general requirements apply to pipelines regulated under this part? |
| (4) Section 192.503  | (49 C.F.R.); | Title: Test Requirements – General requirements                                |
| (5) Section 192.727  | (49 C.F.R.); | Title: Abandonment or deactivation of facilities.                              |
| (6) Section 192.805  | (49 C.F.R.); | Title: Qualification program.  |
| (7) Section 192.807  | (49 C.F.R.); | Title: Recordkeeping.  |
| (8) Section 199.103  | (49 C.F.R.); | Title: Use of persons who fail or refuse a drug test.                          |
| (9) Section 199.105  | (49 C.F.R.); | Title: Drug tests required.  |
| (10) Section 199.113 | (49 C.F.R.); | Title: Employee assistance program.  |
| (11) Section 199.117 | (49 C.F.R.); | Title: Recordkeeping.  |

**Describe Probable Noncompliance:**

*§40.15      May an employer use a service agent to meet DOT drug and alcohol testing requirements?  
(b) As an employer, you are responsible for ensuring that the service agents you use meet the qualifications set forth in this part (e.g., §40.121 for MROs). You may require service agents to show you documentation that they meet the requirements of this part (e.g., documentation of MRO qualifications required by §40.121(e)).*

**DEO failed to provide documentation specifying the identity or qualifications of its Medical Review Officer (MRO) as required by 40.121(e). DEO was unable to provide documentation that service agent Screening Test Technicians (STT) and Breath Alcohol Technicians (BAT) had current refresher training as required by 40.213(e).**

§40.281 *Who is qualified to act as a SAP?*

*(d) Continuing education. During each three-year period from the date on which you satisfactorily complete the examination under paragraph (c)(2) of this section, you must complete continuing education consisting of at least 12 professional development hours (e.g. CEUs) relevant to performing SAP functions.*

One of the two Substance Abuse Professionals (SAP) in the Dominion Drug & Alcohol program, William Elwood, did not meet the continuing education requirements of 40.281(d), and his qualifications expired in June 2017. In addition, DEO submitted documentation associated with individuals who failed drug and alcohol testing signed by Marion Talley, Ron Nicolet, and James Columbro in the capacity of SAP, however none of these people are identified as SAP's in the Dominion Drug & Alcohol program. Marion Talley was qualified at one point as a SRO, however her qualifications expired in May 2017. DEO has no records of qualifications or continuing education for Ron Nicolet or James Columbro.

§192.13 *What general requirements apply to pipelines regulated under this part?*

*(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*

**Dominion Energy failed to follow multiple procedures in its operating and maintenance plan:**

- a.) **SOP 015-01 Abandoning Pipeline Facilities:** DEO failed to accurately record the abandonment of mains or services in regards to its "Service off Service (SOS)" PIR replacement projects. DEO stated that it does not document the abandonment of these lines, and cannot provide records showing they have been properly abandoned.
- b.) **SOP290-01 Pressure Testing:** DEO failed to provide documentation that temporary PE bypasses installed for construction projects were pressure tested. Pressure testing is required for the portion of installed piping and pipeline components that remain attached to the main and pressurized once the bypass is removed.
- c.) **SOP 330-01 Purging Pipeline Facilities:** DEO failed to provide documentation that abandoned mains were purged when placing them out of service, as required by code and Dominion SOP's.
- d.) **SOP 400-07 Hot Taps:** DEO failed to leak test saddle fittings at the required 90 psi for 15 minutes on several projects. The saddle fittings were used for bypass or bagging purposes.

§192.503 *General requirements.*

*(a) No person may operate a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until- It has been tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure.*

DEO failed to pressure test and document PE bypasses that are installed for its construction projects. Pressure testing is required for the portion of installed piping and pipeline components that remain attached to the main and pressurized once the bypass is removed.



192.727

*Abandonment or deactivation of facilities.*

*(b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.*

*(e) If air is used for purging, the operator shall insure that a combustible mixture is not present after purging.*

**Dominion Energy Ohio failed to demonstrate that abandoned mains were disconnected from all sources and supplies of gas, purged, and sealed at the ends for the following PIR replacement projects:**

- P400015820 1260 Boardman Rd. PIR 1720 SOS
- P400018367 193 Dalepark PIR 1754 SOS
- P400016783 4374 Jennings Rd. PIR 1739 SOS
- P400022414 135 W. Satin PIR1809 SOS
- P400102962 Charles St. PIR 2519
- P400213161 44th & Harrison PIR-2838
- P400056225 4th-Kennet PIR 1529
- P400281662 Woodland Ave. VANVWE 1602

**Dominion Energy Ohio failed to demonstrate that service lines were properly abandoned for the following "Service off Service (SOS)" replacement projects:**

- P400015820 1260 Boardman Rd. PIR 1720 SOS
- P400018367 193 Dalepark PIR 1754 SOS
- P400016783 4374 Jennings Rd. PIR 1739 SOS
- P400020227 38415 North Lane PIR 1778-SOS
- P400022414 135 W. Satin PIR1809 SOS

§192.805

*Qualification program.*

*(a) Identify covered tasks;*

**DEO failed to provide documentation on the process used to identify covered tasks through the four-part test listed in 49 CFR 192.801. The DEO operator qualification program has elements from both the Midwest Energy Association (MEA) and ASME B31Q developed Operator Qualification programs. Staff has been told since 2009 that DEO is transitioning from MEA to B31Q, although MEA based documents are still being provided to Staff up to and including Staff's 2018 inspection. Staff cited DEO for this same violation on February 28, 2012 and DEO stated in a response dated March 27, 2012 that it would 1) apply the four-part test to the entire ASME B31Q-2006 covered task list; 2) DEO would compare its original MEA ETN task list to the adopted ASME B31Q-2006 task list; 3) The four-part test was to be applied to any task that did not transfer from MEA ETN to ASME B31Q-2006 covered task list; 4) document and provide an explanation for any MEA ETN covered task that did not meet the four-part test as determined by the operator; and 5) complete implementation of these processes by June 20, 2012. No records from 2012 were not kept and were not provided to Staff.**

*(b) Ensure through evaluation that individuals performing covered tasks are qualified;*

The DEO written qualification program failed to identify specific abnormal operating conditions (AOC) for each covered task. DEO uses AOC taken from the ASME B31Q-2006 generic list, but task specific AOCs are not identified. Staff cited DEO for this violation previously on August 10, 2017 specifically for the odorization covered task and withdrew the violation when DEO provided training materials that addressed AOC's specific to odorization. Staff was unable to identify task specific AOC's for any of the covered tasks reviewed during the inspection. The definition of AOC is "a condition identified by the operator that may indicate a malfunction of a component or deviation from normal operations that may: (a) Indicate a condition exceeding design limits; or (b) Result in hazard(s) to persons, property, or the environment". Consolidating training on AOC's in a generic DEO OQ-1700 "Abnormal Operating Conditions" course is not broad enough to cover the malfunction or deviation from normal operations of all the various equipment and instrumentation used in the DEO pipeline system. DEO must review its qualification program and identify AOC's that are specific to each covered task.

Staff identified an individual (Darrell Sullivan) who performed PE pipe fusion on PIR project 882 (10<sup>th</sup> & Rowland, Canton) from 3/16/17 to 8/21/17. This individual's qualifications for performing PE pipe fusion had expired on 3/9/17. Dominion records show this individual performed at least 102 butt fusions on this project, and in each instance DEO inspectors (Eric Stickney, William Deverall) checked the box "OQ Confirmed" on *DEO's Direct Assessment – Plastic Joining – Pipe Fusion* forms.

Staff determined an individual (Ken Messner) who installed 71 service lines for project P400071816 (Belvidere Ave, Cleveland) from 5/8/17 to 5/31/17 but did not have any Qualifications for covered tasks associated with service line installation. This individual performed the following covered tasks without current operator qualifications: OQ-0561-Pressure Test-Test Pressure Less Than 100 psi; OQ-0681-Joining of Plastic Pipe-Stab Fittings; OQ-0751-Joining of Plastic Pipe-Butt Fusion; OQ-0781-Joining of Plastic Pipe-Electrofusion; OQ-0941-Installation of Tracer Wire; and OQ-1161-Installation of Customer Meters and Regulators. A second individual on this project (Jimmie Hopper) performed various covered tasks without being Qualified on DEO's OQ-1700 "Abnormal Operating Conditions (AOC)". DEO does not have AOC's listed for each covered task and requires all contractor employees to have this qualification prior to performing any covered tasks on its facilities.

*(c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;*

Dominion Energy has not defined the span of control for individuals that are not qualified to perform covered tasks for their MEA covered task list. The DEO Operator Qualification plan, Section E states that covered tasks performed by non-qualified individuals "will be kept to a minimum". It is the opinion of Staff that this is not specific enough to properly define what DEO considers to be an acceptable span of control.



*(f) Communicate changes that affect covered tasks to individuals performing those covered tasks;*

**DEO does not have an effective change-management process that ensures information regarding changes in covered tasks are communicated to relevant employees. DEO currently uses a generic web site that employees may view if the site is visited, however there is no process to let employees know when they need to visit the site, or any documentation to demonstrate the employees have received the information.**

*(i) After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C. Chapter 601 if the operator significantly modifies the program after the administrator or state agency has verified that it complies with this section.*

**DEO failed to document and was unable to describe when significant modifications to the program were made or what the modifications were. The policy of the Gas Pipeline Safety section is that if the operator is able to explain what changes to the program have been made during a scheduled safety inspection then Staff will consider this requirement to be satisfied. DEO must maintain a change log to document significant changes to the plan and summarize what the changes were.**

*§192.807 Recordkeeping. Each operator shall maintain records that demonstrate compliance with this subpart.*

*(a) Qualification records shall include: ... (4) Qualification method(s).*

**DEO failed to identify the qualification methods used when qualifying employees and does not have an established minimum test score or other method of determining a successful qualification for each covered task. DEO is using a sign-in sheet as the sole record of qualification for its employees. DEO needs to identify the qualification methods used for each covered task and record the results.**

*§199.103 Use of persons who fail or refuse a drug test.*

*(a) An operator may not knowingly use as an employee any person who (1) Fails a drug test required by this part and the medical review officer makes a determination under DOT Procedures; or (2) Refuses to take a drug test required by this part.*

**DEO failed to provide documentation showing that employees that either failed or refused a random drug/alcohol test were immediately removed from duty, nor provide information that they have successfully completed the required education or treatment plans as recommended by the SAP's assigned to their cases.**

**§199.105**      *Drug tests required.*

*(c) Random testing. (1) Except as provided in paragraphs (c)(2) through (4) of this section, the minimum annual percentage rate for random drug testing shall be 50 percent of covered employees.*

The random drug testing rate in 2015 was set at 25 percent of all covered employees as determined by the Administrator, Pipeline and Hazardous Materials Safety Administration as allowed in paragraph (c)(3). DEO failed to meet the 25 percent rate in CY2015. The number provided on DEO's 2015 Management Information System (MIS) report was 19.4%. Staff is unsure whether the 25 percent rate was met in CY2016 as DEO provided four different numbers for their random drug testing rate during the course of the inspection.

*(f) Follow-Up Testing. A covered employee who refuses to take or has a positive drug test shall be subject to unannounced follow-up drug tests administered by the operator following the covered employee's return to duty. The number and frequency of such follow-up testing shall be determined by a substance abuse professional, but shall consist of at least six tests in the first 12 months following the covered employee's return to duty. In addition, follow-up testing may include testing for alcohol as directed by the substance abuse professional, to be performed in accordance with 49 CFR part 40. Follow-up testing shall not exceed 60 months from the date of the covered employee's return to duty. The substance abuse professional may terminate the requirement for follow-up testing at any time after the first six tests have been administered, if the substance abuse professional determines that such testing is no longer necessary.*

DEO failed to follow the SAP's recommended follow-up drug testing for two employees that had positive drug tests, and for one employee who refused a drug test. The SAP recommended the employees with positive drug tests be tested for drugs and alcohol once a month for twelve months, followed by once every three months for an additional three years following their return to duty. Employee ID # 777129646 was to have random drug and alcohol tests conducted every month for twelve months starting in September 2016. The employee was not tested for alcohol in April or May of 2017. Employee ID # 777140732 was to have random drug and alcohol tests conducted every month for twelve months starting in September 2016. The employee was not tested for alcohol in May 2017 or June of 2017, and was not tested for drugs in April 2017 or June 2017. Employee ID # 777124929 refused a drug test, and was to complete six random drug and alcohol tests within a 12 month period starting September 2016. The employee was given 6 random drug tests, yet random alcohol tests were not conducted. None of these employees successfully completed their return to duty plans as required by the SAP's involved with each case.

**§199.113**      *Employee assistance program.*

*(b) Education under each EAP must include at least the following elements: display and distribution of informational material; display and distribution of a community service hot-line telephone number for employee assistance; and display and distribution of the employer's policy regarding the use of prohibited drugs.*

DEO switched EAP providers for 2018, but failed to communicate the change in providers to its employees. The material used for the display and distribution of information references the old provider.



§199.117

*Recordkeeping*

*(a) Each operator shall keep the following records for the periods specified and permit access to the records as provided by paragraph (b) of this section: (1) Records that demonstrate the collection process conforms to this part must be kept for at least 3 years. (2) Records of employee drug test that indicate a verified positive result, records that demonstrate compliance with the recommendation of a substance abuse professional, and MIS annual report data shall be maintained for a minimum of five years. (3) Records of employee drug test results that show employees passed a drug test must be kept for at least 1 year. (4) Records confirming that supervisors and employees have been trained as required by this part must be kept for at least 3 years.*

*(b) Information regarding an individual's drug testing results or rehabilitation must be released upon the written consent of the individual and as provided by DOT Procedures. Statistical data related to drug testing and rehabilitation that is not name-specific and training records must be made available to the Administrator or the representative of a state agency upon request.*

**DEO failed to provide copies of submitted MIS reports from 2015, 2016 or 2017. Staff obtained these records directly from U.S. DOT. A review of random drug testing data submitted by DEO for individuals in 2016 showed the test results could not be reconciled with data submitted on the 2016 MIS report. Staff reviewed reported random drug testing rates from the 2016 MIS report, a Power Point presentation given by DEO employees, and two different versions of spreadsheets recording random drug testing results for individuals in 2016, and all four sources of information gave four different values for the DEO 2016 random drug testing rate.**

**DEO failed to provide documentation of individual positive and negative drug testing results for 2015 or 2017.**

**DEO failed to provide documentation that supervisors and employees have been trained on the DEO drug and alcohol testing plan as required by 199.117(a)(4).**



**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

June 4, 2018

Jim Eck, Vice President Gas Operations  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44103

Mr. Eck:

On March 5 - April 9, 2018, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Canton, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to Jim Eck Title Vice President Gas Operations  
Operator Dominion Energy Ohio  
Address 1201 East 55th Street  
City Cleveland State Ohio Zip Code 44103  
Date of Inspection March 5 - April 9, 2018 Place of Inspection 4725 Southway, Canton  
GPS Inspector Keith A. Topovski

**DESCRIPTION**

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

- (1) Section 192.13(c) (49 C.F.R.); Title: What general requirements apply to pipelines regulated under this part?  
(2) Section 192.479(a) (49 C.F.R.); Title: Atmospheric corrosion control: General.  
(3) Section 192.481(c) (49 C.F.R.); Title: Atmospheric corrosion control: Monitoring.

**Describe Probable Noncompliance**

192.13(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.

**Dominion Energy Ohio (DEO) failed to follow the following procedures:**

- **DEO Standard Operating Procedure (SOP) 070-16 Corrosion Control - Atmospheric Corrosion. II. General E. All additions or replacements of aboveground pipelines and all aboveground pressure vessels should be coated with Company-approved materials, using Company approved procedures.**
- **DEO SOP 070-17 Corrosion Control- Remedial Measures II. General A. Remedial measures shall be taken correct any deficiencies discovered during monitoring for external, internal or atmospheric corrosion; B. Remedial measures for external or internal corrosion should be completed within 15 months or by the next required inspection, whichever is less. If the remedial measures do not completely correct the problem prior to the next required inspection, continuous remedial action will be performed until the problem is resolved.**

192.479(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

**DEO replaced and added new pipe and fittings to regulator station LS-D-866 (Strip Station) and did not clean and coat the portions of pipeline exposed to the atmosphere.**

**Valve #4688 was replaced at McDowell Border Station and was not cleaned and coated.**



192.481(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by Sec. 192.479.

**Field investigation by Staff determined there are many instances of disbonded coating and associated pitting and atmospheric corrosion at DEO's Gross Station. Instances of active atmospheric corrosion were noted on the TPL #4 and #5 regulator stations, pipeline #207, and two adjoining valves numbered 588 and 967. DEO records showed that a visual inspection was performed by DEO personnel on 11/28/2016 and recorded in the DEO RFID database. Inspection documents state there are "corrosion/coating concerns that should be addressed before the next inspection (3 years)" which is in conflict with DEO's SOP 070-17. It appears that RSIS may be assigning a maintenance task to remediate atmospheric corrosion and disbonded coatings with an assigned completion date of the next scheduled inspection, instead of 15 months or the next scheduled inspection whichever is less.**

**Similar violations involving failure to clean and coat newly installed piping and failure to remediate active atmospheric corrosion were issued by Staff to DEO on September 21, 2016 (Eastern), September 19, 2016 (Youngstown), June 3, 2015 (Eastern) and July 18, 2014 (Canton).**



**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedman  
Daniel R. Conway

August 31, 2018

Mr. James E. Eck, Vice President  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44101-0759

Mr. Eck:

On 07/09/18 – 07/19/18, representatives of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at North Canton, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to James E. Eck Title Vice President  
Operator Dominion Energy Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State Ohio Zip Code 44101-0759  
Dates of Inspection 07/09/18 – 07/19/18  
Place of Inspection North Canton  
GPS Inspectors Dennis Cramer, Chris Domonkos

**DESCRIPTION**

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

- (1) Section 192.161 (49 C.F.R.); Title: Supports and anchors.
- (2) Section 192.179 (49 C.F.R.); Title: Transmission line valves.
- (3) Section 192.243 (49 C.F.R.); Title: Nondestructive testing.
- (4) Section 192.479 (49 C.F.R.); Title: Atmospheric corrosion control: General.
- (5) Section 192.481 (49 C.F.R.); Title: Atmospheric corrosion control: Monitoring.
- (6) Section 192.503 (49 C.F.R.); Title: General requirements.
- (7) Section 192.605 (49 C.F.R.); Title: Procedural manual for operations, maintenance, and emergencies.
- (8) Section 192.619 (49 C.F.R.); Title: Maximum allowable operating pressure: Steel or plastic pipelines.
- (9) Section 192.625 (49 C.F.R.); Title: Odorization of gas.
- (10) Section 192.723 (49 C.F.R.); Title: Distribution systems: Leakage surveys.
- (11) Section 192.745 (49 C.F.R.); Title: Valve maintenance: Transmission lines.

**Describe Probable Noncompliance**

- §192.161 Supports and anchors.***  
*(c) Each support or anchor on an exposed pipeline must be made of durable, noncombustible material.*  
*(3) Movement of the pipeline may not cause disengagement of the support equipment.*

Gross Station has several pipe supports that have been removed or have become disengaged, and several concrete piers at this location are deteriorated and require repair or replacement. The Yearly regulating station has pipe supports that are not in contact with the pipe and need to be remediated. The supports at several storage wells (Marich Comm. Well #1, Galehouse #4, Slicker Farm Tap) have become disengaged and are not properly supporting the piping.

- §192.179 Transmission line valves.***  
*(b) Each sectionalizing block valve on a transmission line, other than offshore segments, must comply with the following:*  
*(1) The valve and the operating device to open or close the valve must be readily accessible and protected from tampering and damage.*

Dominion Energy Ohio has not locked, fenced in, or otherwise protected mainline valves from tampering or damage at: Cable # 5 meter station and well, storage well valve #4428, storage well valve #29535, and storage well valve #29521.



**§192.243**      *Nondestructive testing.*

*(d) When nondestructive testing is required under §192.241(b), the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference;*

*(2) In Class 2 locations, at least 15 percent.*

Nondestructive testing was not performed on any welds completed for a farm tap that was installed at the Camp Conn. Well in 2017. There are 94 total farm taps in the North Canton system without welding or other construction where nondestructive testing may or may not have been required.

**§192.479**      *Atmospheric corrosion control: General.*

*(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.*

*(b) Coating material must be suitable for the prevention of atmospheric corrosion*

Dominion failed to properly coat newly installed piping and appurtenances at several locations throughout the North Canton operating area. The areas are noted as follows:

- 1.) Yearkey Station: Bare 1" steel sense lines installed without coating, several 1" plugs and valves installed without an approved coating.
- 2.) Strausser Station: Newly installed piping was not properly coated (primer only) and has bare sections that remain uncoated under the piping supports. Several 1" and 2" blow down valves with steel nipples and plugs are uncoated. Nuts and bolts are uncoated at flanges. A 1" pipe connected to a drip tank is uncoated.
- 3.) Chippewa Compressor Station: Station discharge piping has uncoated nuts and bolts at flanges. The new compressor building contains uncoated piping, pipe fittings, and nuts and bolts at flanges.
- 4.) Gross Station: Several areas throughout the fenced in area contain bare piping, relief valves, and valves that were not properly coated at the time of installation.

Staff has previously cited Dominion Energy Ohio for failure to clean and coat newly installed piping and appurtenances on June 4, 2018 (Canton), September 21, 2016 (Eastern), September 19, 2016 (Youngstown), and July 18, 2014 (Canton).

**§192.481**      *Atmospheric corrosion control: Monitoring.*

*(b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.*

*(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by 192.479.*

Dominion Energy failed to inspect for atmospheric corrosion under pipe supports at all field facilities observed by Staff as required by this subpart.

**§192.503**      *General requirements.*

*(a) No person may operate a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until-*

*(1) It has been tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure*

Staff identified 94 farm taps operated by Dominion Energy Ohio from jurisdictional storage field piping that has not been tested to substantiate a maximum allowable operating pressure (MAOP). A tap was installed at the Camp Conn. #1 well in 2017 and the only pressure testing information available was a test on an installed drip that was tested at 150 psig attached to a system operating at a MAOP of 1,565 psig. No other pressure testing records were available for any of the other taps.

§192.605      *Procedural manual for operations, maintenance, and emergencies.*  
*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.*

**Dominion Energy failed to follow its standard operating procedures for the following items:**

- **070-06 Atmospheric Corrosion** – Dominion failed to clean and coat several exposed areas of their facilities.
- **070-17 Remedial Measures** – Dominion failed to remediate several areas with atmospheric corrosion as found during routine inspections.
- **170-01 Leak Surveillance** – DEO failed to conduct leak surveys on 94 farm taps in their operating area.
- **190-01 Maximum Allowable Operating Pressure**–Dominion failed to determine the MAOP of 94 farm taps that are installed in the storage field.
- **230-04 Odorization Sampling** – Dominion failed to monitor the odorant levels for 94 farm taps located in the storage field.
- **290-04 Pressure Testing** – DEO failed to pressure test 94 farm taps located in the storage field.
- **400-03 Welding Inspection and Test of Welds** – DEO failed to document, inspect, and nondestructively test welds performed on 94 farm taps.
- **Design and Construction Manual Section 11 Corrosion Protection Specifications-11.16 Above Ground Painting**–For failing to properly clean, prime, and coat above ground piping and appurtenances at various locations.

§192.619      *Maximum allowable operating pressure: Steel or plastic pipelines.*  
*(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or (d) of this section, or the lowest of the following:*  
*(1) The pressure obtained by dividing the pressure to which the segment was tested after construction as follows:*  
*(ii) For steel pipe operated at 100 p.s.i. (689 kPa) gage or more, the test pressure is divided by a factor determined in accordance with the following table...*

**Dominion Energy Ohio is operating 94 farm taps located within the storage field without documentation of pressure testing to establish a MAOP.**

§192.625      *Odorization of gas.*  
*(f) To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.*

**Dominion Energy Ohio did not conduct periodic sampling for odorant at 94 farm taps identified in the North Canton operating area.**

192.723      *Distribution systems: Leakage surveys.*  
*(a) Each operator of a distribution system shall conduct periodic leakage surveys in accordance with this section.*

**Dominion Energy Ohio did not conduct periodic leakage surveys of service lines associated with 94 farm taps identified in the North Canton operating area.**

§192.745

*Valve maintenance: Transmission lines.*

*(a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.*

**Critical valve # 8467 was determined inoperable on 08/03/17. Dominion Energy Ohio designated alternate valves # 3762, # 6282, # 6274, and # 2462 as critical in its place, however valve # 6282 was not inspected for operation. The last inspection for valve #6282 was 04/03/2013. Staff has noted that alternate critical valves are designated without a corresponding field verification that they are operable in previous inspections.**





**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

November 21, 2018

James E. Eck, Vice President  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, OH 44101-0759

Mr. Eck:

From 9/1/18 to 9/26/18, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Northeast, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to James E. Eck Title Vice President  
Operator Dominion Energy Ohio  
Address 1201 East 55<sup>th</sup> Street  
City Cleveland State OH Zip Code 44101-0759  
Dates of Inspection 9/1/18 to 9/26/18  
Place of Inspection Northeast  
GPS Inspector Chris Domonkos

**DESCRIPTION**

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

- (1) Section 192.161 (49 C.F.R.); Title: Supports and anchors.
- (2) Section 192.321 (49 C.F.R.); Title: Installation of plastic pipe.
- (3) Section 192.745 (49 C.F.R.); Title: Valve maintenance: Transmission lines.
- (4) Section 192.805 (49 C.F.R.); Title: Qualification program.

**Describe Probable Noncompliance**

**§192.161** *Supports and anchors.*  
*(a) Each exposed pipeline must have enough supports or anchors to protect the exposed pipe joints from the maximum end force caused by internal pressure and any additional forces caused by temperature expansion or contraction or by the weight of the pipe and its contents.*

The supports at the Chardon Rd. Station were removed in 2014 for painting, and have not been reinstalled. Reinstall these supports or provide an engineering analysis to demonstrate the supports are not needed at this location.

**§192.321** *Installation of plastic pipe.*  
*(g) Uncased Plastic pipe may be temporarily installed above ground level under the following conditions: (1) The operator must be able to demonstrate that the cumulative aboveground exposure of the pipe does not exceed the manufacturer's recommended maximum period of exposure or 2 years, whichever is less.*

The following two areas were observed during the audit that exceeded the 2 year maximum period of exposure for PE pipe:

1. Sara Lee Dr., Concord – Exposure documented as found on 05/18/16, remediation due by 5/18/18; and
2. Rosewood Dr., Chardon – Exposure found on 9/16/16, remediation due by 9/16/18.

Both areas were documented in Dominion's Weather and Outside Force (WOF) program, yet remediation was not scheduled for either of these areas. Investigate the effectiveness of your WOF program and make corrections as necessary.

**§192.745**      *Valve maintenance: Transmission lines.*

- (a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.*
- (b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.*

Four Type A Gathering Line valves designated by Dominion Energy Ohio as critical valves were found to be inoperable on 9/16/2018 during the Staff inspection. Documentation provided by Dominion shows that valves 18131 and 18133 were operated in April of 2018, and valves 21012 and 21014 were operated in August of 2018.

The gear assemblies for valve numbers 18131 and 18133 were found to be disengaged and inoperable. DEO employees were able to get both of these valves to operate only after disassembling the valves and reinstalling the gear assemblies in the proper position. The valve station where these two valves were located was last painted in 2015, and both of the valves had bolts holding the top bonnets on painted gray on the threads.

Valve numbers 21012 and 21014 had heavy corrosion on the valve shafts and the shafts were corroded to the support bracket indicating that the valves had not been operated in some time. In addition to the corrosion, threads on the valve stems had unbroken gray paint and red primer indicating the valves had not been partially operated since the paint was applied. Dominion employees attempted to operate the valves during the inspection, and both were inoperable prior to being greased and remediated.

**§192.805**      *Qualification program*

*Each operator shall have and follow a written qualification program. The program shall include provisions to: (b) Ensure through evaluation that individuals performing covered tasks are qualified;*

Dominion employees conducting odorant level reads failed to follow procedures for determining the level of readily detectable odorant in the gas stream. The operators were using a conversion sheet from 2014 instead of using the correction chart that is attached to the door of the Bacharach unit. The conversion chart is specific to each Bacharach unit and are not interchangeable between odorometer units. Review your Operator Qualification program to ensure employees performing this covered task are properly trained in how to use their equipment and requalify individuals as appropriate.

On June 17, 2016 Dominion provided a written response to a previous violation at Dominion's Ashtabula (Lakeshore) operating area related to the monitoring of odorant. This response stated "In order to reduce its violation on manual procedures, Dominion will incorporate odor readings in its work management and compliance tracking system. DEO will submit a request for the necessary IT development on or before September 30, 2016". This has not been done. Either complete this corrective action or amend your proposed corrective action plan from June 17, 2016.





**Public Utilities  
Commission**

Asim Z. Haque, Chairman

**Commissioners**

M. Beth Trombold  
Thomas W. Johnson  
Lawrence K. Friedeman  
Daniel R. Conway

December 14, 2018

James E. Eck, Vice President  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44101-0759

Mr. Eck:

From 10/01/18 to 11/02/18, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Eastern (Randall), pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

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

Sincerely,

Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts  
Enclosure

**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to	<u>James E. Eck</u>	Title	<u>Vice President</u>
Operator	<u>Dominion Energy Ohio</u>		
Address	<u>1201 East 55<sup>th</sup> Street</u>		
City	<u>Cleveland</u>	State	<u>Ohio</u> Zip Code <u>44101-0759</u>
Date of Inspection	<u>10/01/18 – 11/02/18</u>		
Place of Inspection	<u>Eastern (Randall)</u>		
GPS Inspector	<u>Chris Domonkos</u>		

**DESCRIPTION**

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

- (1) Section 192.13 (49 C.F.R.); Title: What general requirements apply to pipelines regulated under this part?
- (2) Section 192.383 (49 C.F.R.); Title: Excess flow valve installation.
- (3) Section 192.605 (49 C.F.R.); Title: Procedural manual for operations, maintenance, and emergencies.

**Describe Probable Noncompliance**

**192.13**      *What general requirements apply to pipelines regulated under this part?*  
*(c) Each operator, shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*

**Dominion Energy Ohio (DEO) failed to follow its Standard Operating Procedure (SOP) 125/01 "Excess flow valves". DEO failed to install required excess flow valves on at least 10 multifamily residences identified at the Eastern (Randall) operating center.**

**192.383**      *Excess flow valve installation.*  
*(b) Installation required. An EFV installation must comply with the performance standards in 192.381. After April 14, 2017, each operator must install an EFV on any new or replaced service line serving the following types of services before the line is activated: (4) Multifamily residences with known customer loads not exceeding 1,000 SCFH per service, at time of service installation based on installed meter capacity.*

**DEO failed to install an excess flow valve (EFV) for in a service line for a multifamily residence located at 4725 W. Mill Rd., Broadview Heights. After Commission Staff identified 4725 W. Mill Rd., a records search of other multifamily services installed after April 14, 2016 performed by Dominion personnel identified an additional 9 service lines that were installed without excess flow valves.**

**Staff has previously identified a failure to install EFV's at the Marietta operating area. Review your operator qualification plan and management of change processes to ensure that employees and service area management have been informed of the conditions where EFV's must be installed, and review your system to identify and correct multifamily services installed since April 14, 2017 without a required EFV.**

192.605

*Procedural manual for operations, maintenance, and emergencies.*

*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.*

**DEO failed to follow its SOP 150/01 "Maintaining inactive or temporarily deactivated pipeline facilities" which states that pipeline facilities not maintained in accordance with this manual shall be abandoned. DEO regulating station LS-292 located at E 122<sup>nd</sup> St. and Miles Ave., Cleveland was inspected during the field portion of the audit. Records provided by DEO state that the station is "Out of Service due to business reasons" and has been since May 4, 2009. The station was shut in by closing the inlet and outlet valves, removing the regulator sense lines, and removing the telemetry unit used to monitor pressure. The regulators remain connected to the inlet and outlet piping with the pressure sensing lines removed. If energized, the regulators would fail in open position since an outlet pressure would not be detected, resulting in the overpressurization of a low pressure distribution system. Either properly abandon this station in accordance with the appropriate SOP's or return it to service.**





# Public Utilities Commission

Mike DeWine, Governor  
M. Beth Trombold, Interim Chair

## Commissioners

Thomas W. Johnson  
Lawrence K. Friedeman  
Dennis Deters  
Daniel R. Conway

April 5, 2019

James E. Eck, Vice President of Distribution Operations  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44103

Mr. Eck:

On January 14 to January 18, 2019, representatives of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records associated with operation and maintenance procedures and records at 320 Springside Drive, Akron OH 44333, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Gas Pipeline Safety section Staff identified the following deficiencies:

1. The Pipeline Safety Regulations, 49 CFR 192.614 "Damage Prevention" section (c)(1) requires operators to "Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located". The excavator list provided during the inspection was a Paradigm list based off of SIC (Standard Industrial Classifications) codes and did not reflect persons who normally engage in excavation activities near the Dominion pipeline system. Staff recommends Dominion develop a list of excavators who normally work around company facilities based off of one-call tickets.
2. Dominion is not conducting, documenting, or performing effectiveness evaluations of emergency simulations as required by Dominion's Emergency Plan section 20.2 "Annual Emergency Simulations". The Pipeline Safety Regulations, 49 CFR 192.615 "Emergency Plans" section (b)(2) requires operators to "Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that training is effective" and (b)(3) requires operators to "Review employee activities to determine whether the procedures were effectively followed in each emergency". Staff also identified this issue during the 2018 operation and maintenance plan inspection. Staff recommends a review of Dominion's planned actions to train operating personnel on emergency procedure and evaluate the effectiveness of emergency response.
3. The Dominion Public Awareness Plan was not available for review during the inspection because it was saved on an employee's personal drive who was on vacation. Staff recommends the Dominion Public Awareness Plan and associated records be

maintained on a shared drive or otherwise maintained in a manner that allows for access by other company employees.

4. The Dominion Operator Qualification plan does not include management of change procedures for communicating procedure changes to employees and contractors. Over time this may cause situations where operator qualification training does not reflect procedures and/or equipment used in the field. Staff recommends developing procedures to accommodate management of change.
5. Dominion does not have procedures to ensure they are notified in a timely manner of any drug or alcohol test failures for all covered employees (specifically contractors). Dominion relies on their contractors to remove individuals who fail a random test from duty and are not notified until 6 month reports are turned in to Veriforce by the contractors. Staff review also determined that many contractor employee lists are not current and many contract employees working on Dominion projects are therefore not subject to random drug testing. Please review your procedures to ensure Dominion contract employees are covered by anti-drug and alcohol misuse prevention programs.

Please respond within 30 days from the date of this letter. If you need more information, you may contact me at (614) 644-8983 or via e-mail at [peter.chace@puco.ohio.gov](mailto:peter.chace@puco.ohio.gov).

Sincerely,



Peter A. Chace, Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division

PC:ts



# Public Utilities Commission

Mike DeWine, Governor  
Sam Randazzo, Chairman

## Commissioners

M. Beth Trombold  
Lawrence K. Friedeman  
Dennis P. Deters  
Daniel R. Conway

January 21, 2020

Jim Eck, Vice President  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44101-0759

Dear Mr. Eck:

On 10/21/19 – 12/20/19, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at Northeast, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

If you need more information, please call me at 614-466-8205.

Sincerely,

Joe Dragovich, P.E.  
Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division  
Public Utilities Commission of Ohio

JD:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to	<u>Jim Eck</u>	Title	<u>Vice President</u>
Operator	<u>Dominion Energy Ohio</u>		
Address	<u>1201 East 55<sup>th</sup> Street</u>		
City	<u>Cleveland</u>	State	<u>Ohio</u> Zip Code <u>44101-0759</u>
Date of Inspection	<u>10/21/19 – 12/20/19</u>		
Place of Inspection	<u>Northeast</u>		
GPS Inspector	<u>Chris Domonkos</u>		

**DESCRIPTION**

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

- |                                  |  |
|----------------------------------|--|
| (1) Section 192.483 (49 C.F.R.); | Title: Remedial measures: General.                                     |
| (2) Section 192.605 (49 C.F.R.); | Title: Procedural manual for operations, maintenance, and emergencies. |
| (3) Section 192.721 (49 C.F.R.); | Title: Distribution systems: Patrolling.                               |

**Describe Probable Noncompliance**

**§192.483**      *Remedial measures: General.*  
*(c) Except for cast iron or ductile iron pipe, each segment of buried or submerged pipe that is required to be repaired because of external corrosion must be cathodically protected in accordance with this subpart.*

**Dominion Energy failed to install anodes for cathodic protection during corrosion leak repairs. Leak repairs located at 31510 Royalview, Willowick, 37603 Euclid Ave., Willoughby, and 255 East 257<sup>th</sup> St., Euclid were all repairs on bare mains that were repaired without installing cathodic protection.**

**§192.605**      *Procedural manual for operations, maintenance, and emergencies*  
*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.*

**Dominion Energy failed to follow its standard operating procedures for the following items:**

- **070-17 Remedial Measures – Dominion failed to remediate several areas with external corrosion within 15 months as found during visual inspections while conducting leak repairs.**
- **270-01 Pipeline repair or replacement – DEO employees failed to install anodes and properly coat bare pipe during pipeline leak repairs.**

§192.721

*Distribution systems: Patrolling.*

*(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled*

*(2) Outside business districts, at intervals not exceeding 7 1/2 months, but at least twice each calendar year.*

**Dominion Energy failed to patrol four service line exposures in the Northeast Operating area that are a threat to their system due to external loading. The areas are identified as follows:**

WOF ID#	Address	GPS Lat	GPS Long	Date Identified
L#9891-001	6206 N. Woodlane Dr., Mayfield Heights	41.53400	-81.45542	05/17/2017
L#9891-002	6184 N. Woodlane Dr., Mayfield Heights.	41.53394	-81.45639	05/15/2017
L#14936-001	6777 Gates Mills Blvd., Gates Mills	41.51458	-81.43044	03/02/2018
L#1436-001	9626-9630 Chillicothe Rd., Kirtland	41.605330	-81.35036	03/19/2018



# Public Utilities Commission

Mike DeWine, Governor  
Sam Randazzo, Chairman

## Commissioners

M. Beth Trombold  
Lawrence K. Friedeman  
Dennis P. Deters  
Daniel R. Conway

January 22, 2020

Jim Eck, Vice President  
Dominion Energy Ohio  
1201 East 55<sup>th</sup> Street  
Cleveland, Ohio 44101-0759

Dear Mr. Eck:

On 10/07/19 – 10/25/19, a representative of the Public Utilities Commission of Ohio conducted a pipeline safety inspection of your pipeline facilities and records at North Canton, pursuant to Section 4905.91(B) of the Ohio Revised Code.

As a result of the inspection, the Staff has issued the following Notice of Probable Noncompliance to Dominion Energy Ohio in accordance with Section 4901:1-16-09 of the Ohio Administrative Code, for review and written response within 30 days. The response is your opportunity to provide additional information for consideration by the Staff and/or to provide a proposed corrective action plan.

If you need more information, please call me at 614-466-8205.

Sincerely,

Joe Dragovich, P.E.  
Program Manager  
Gas Pipeline Safety Section  
Facility and Operations Field Division  
Public Utilities Commission of Ohio

JD:ts  
Enclosure



**THE PUBLIC UTILITIES COMMISSION OF OHIO  
GAS PIPELINE SAFETY SECTION**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**NOTICE OF PROBABLE NONCOMPLIANCE**

Sent to	<u>Jim Eck</u>	Title	<u>Vice President</u>
Operator	<u>Dominion Energy Ohio</u>		
Address	<u>1201 East 55<sup>th</sup> Street</u>		
City	<u>Cleveland</u>	State	<u>Ohio</u> Zip Code <u>44101-0759</u>
Date of Inspection	<u>10/07/19 – 10/25/19</u>		
Place of Inspection	<u>North Canton</u>		
GPS Inspector	<u>Chris Domonkos</u>		

**DESCRIPTION**

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

- |                                  |  |
|----------------------------------|--|
| (1) Section 192.479 (49 C.F.R.); | Title: Atmospheric corrosion control: General.                           |
| (2) Section 192.491 (49 C.F.R.); | Title: Corrosion control records.  |
| (3) Section 192.503 (49 C.F.R.); | Title: General requirements.   |
| (4) Section 192.605 (49 C.F.R.); | Title: Procedural manual for operations, maintenance, and emergencies.   |
| (5) Section 192.619 (49 C.F.R.); | Title: Maximum allowable operating pressure: Steel or plastic pipelines. |

**Describe Probable Noncompliance**

- §192.479**      *Atmospheric corrosion control: General.*
- (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.*
  - (b) Coating material must be suitable for the prevention of atmospheric corrosion.*

**Dominion failed to properly coat newly installed piping and appurtenances at several locations throughout the North Canton operating area. The areas are noted as follows:**

- 1.) Aultman Station-Bare 1" weld-o-let, valves and steel piping were installed without being properly cleaned and coated. The newly installed remote control valves were installed without a proper coating.**
- 2.) Several areas throughout the operating area contain bare piping, weld-o-lets, valves, and plugs that were installed without the proper coatings to protect them from atmospheric corrosion. The areas were noted on above ground valve clusters and pig launchers.**

**§192.491**      *Corrosion control records.*

- (c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§192.465(a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service*

The atmospheric corrosion records that were provided by Dominion for the Gross Station do not include the regulating stations, only the outside of the buildings. When brought to Dominion's attention, a Dominion Supervisor added photos to the document. The photos should be added as an addendum, not to the original document. In addition, electronic records for the purpose of compliance should not be altered.

**§192.503**      *General requirements.*

- (a) No person may operate a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until-*  
*(1) It has been tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure.*

DEO failed to properly pressure test the upstream drip and farm tap at the Gabor Farm that is installed on jurisdictional piping located in the storage field.

**§192.605**      *Procedural manual for operations, maintenance, and emergencies.*

- (a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.*

Dominion Energy failed to follow its standard operating procedures for the following items:

- **070-06 Atmospheric Corrosion** – Dominion failed to provide coatings on several exposed areas of their facilities.
- **070-17 Remedial Measures** – Dominion failed to remediate several areas with atmospheric corrosion as found during routine inspections.
- **190-01 Maximum Allowable Operating Pressure** – Dominion failed to pressure test the drip and farm tap to meet the 1600 psi MAOP system where they were installed.
- **290-04 Pressure Testing** – DEO failed to pressure test the Gabor farm taps located in the storage field.
- **Design and Construction Manual Section 11 Corrosion Protection Specifications-11.16 Above Ground Painting-For** failing to properly clean, prime, and coat above ground piping and appurtenances at various locations.

**§192.619**

*Maximum allowable operating pressure: Steel or plastic pipelines.*

*(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or (d) of this section, or the lowest of the following:*

*(2) The pressure obtained by dividing the pressure to which the segment was tested after construction as follows:*

*(ii) For steel pipe operated at 100 p.s.i. (689 kPa) gage or more, the test pressure is divided by a factor determined in accordance with the following table:*

<b>Class location</b>	<b>Factors (see Note)</b>		
	<b>Segment Installed Before Nov. 12, 1970</b>	<b>Segment Installed After Nov. 11, 1970</b>	<b>Segment Converted under §192.14</b>
<b>1</b>	<b>1.1</b>	<b>1.1</b>	<b>1.25</b>
<b>2</b>	<b>1.25</b>	<b>1.25</b>	<b>1.25</b>
<b>3</b>	<b>1.4</b>	<b>1.5</b>	<b>1.5</b>
<b>4</b>	<b>1.4</b>	<b>1.5</b>	<b>1.5</b>

Dominion failed to properly pressure test an upstream drip and the farm tap for the Gabor Farm tap. The upstream drip was only pressure tested to 1440 psi, and the farm tap tested at 1100 psi on a 1600 psi MAOP system.



**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**2/28/2020 5:13:58 PM**

**in**

**Case No(s). 19-2140-GA-GPS**

Summary: Staff Report of Investigation Part 3 electronically filed by Mr. Thomas E Stikeleather on behalf of PUCO Staff.