

US DOT  
PHMSA...

May 2, 2017

Ms R Smolker on behalf of 8 VT organizations and residents....

Dear Ms Smolker,

We received your correspondence on behalf of Vermont Grassroots Organizations and Stakeholders (VTGOS) dated April 10, 2017, voicing concerns regarding the construction of the VGANGP. On October 15<sup>th</sup>, 2016, VTGOS sent an email to the PHMSA requesting that PHMSA assume oversight of construction monitoring and enforcement from the VTDPSS, investigate the States oversight of the construction project, and reject the states certification under 49 USC & 60105. On Jan 23, 2017, PHMSA received emails from the VTGOS clarifying their request for our investigation to cover the entire construction of the ANGP, beginning in 2014. On February 27, 2017, an email from the VTGOS stated more information would be forthcoming; this information was received in the April 10, 2017 correspondence.

As a result of the VTGOS concerns, PHMSAs State Programs Division assigned two State Evaluators/Liaisons to review the construction inspections conducted by the DPS; a DPS site visit, including a review of construction inspection files and records, was conducted on March 28-9, 2017. In addition, PHMSA State Programs Division staff and the DPS Operations Engineer toured the pipeline right of way and above ground facilities by vehicle on March 29, 2017. PHMSA found the DPS inspectors to be knowledgeable regarding pipeline construction, able to both identify issues and note problems requiring corrective actions. Our review did not uncover issues that would warrant rejection of the DPS certification.

In addition to the above, a PHMSA welding expert reviewed the welding procedures used for the ANGP construction project, which were found to be properly written and qualified. The girth welds installed on the project were 100 percent radiographed. The Oak Ridge National Laboratory, ORNL, a recognized expert in welding, reviewed many elements of the ANGP project. The review examined non-destructive examination (NDE) procedures, including NDE procedure qualification, NDE personnel qualification, a random sampling of 150 radiographs of girth welds throughout the project, and visual, radiographic, and magnetic particle inspection records. The ORNL review did not identify any noncompliance issues concerning the NDE procedures, personnel qualifications or girth welds.

A PHMSA Inspector reviewed coating concerns and corrosion protection plans and procedures for horizontal directional drilled sections of the ANGP project; no pipeline integrity issues were identified from these reviews. Additionally, a PHMSA Inspector witnessed the successful hydrostatic testing of the Geprags Park section of the project alongside a VDPS Gas Engineer. Vermont Gas records indicate that it is using in-line inspection tools to inspect the pipeline for

construction defects, including the segment which runs along the bottom of the clay ditch without padding. Additionally, Vermont Gas will complete a depth-of-cover survey in May 2017 to confirm that the pipeline is installed at the proper depth.

PHMSA will review and consider the compliance concerns raised in your correspondence dated April 10 2017, during our annual evaluation of the pipeline safety program. The result of this review could affect grant funding to the DPS. PHMSA will also follow up on any outstanding issues after our pipeline safety program evaluation.

Thank you for your commitment to the safety of your community and for bringing your concerns to my attention. If you have additional questions regarding this issue please contact Patricia Klinger, Deputy Director of the Office of Governmental, International and Public Affairs, by phone at (202) 366-6374, or by email at [Patricia.Klinger@dot.gov](mailto:Patricia.Klinger@dot.gov).

Sincerely,

Howard W. McMillian  
Acting Deputy Administrator