

**ICC Docket No. 10-0635**

**United States Steel Corporation's Response to  
Illinois Commerce Commission Staff ("Staff") Data Requests  
PSP 2.01 – 2.02  
Date Received: September 17, 2015  
Date Served: October 5, 2015**

**REQUEST NO. PSP 2.01:**

In describing recent changes to operations that have occurred at GCW, Mr. Baker states:

First, GCW has discontinued the use of the natural gas line described as the "South Plant Line" in my previous testimony. That line has been physically disconnected from its supply sources.

(USS Ex. 4.0, 3:53-55.)

In addition, Mr. Baker further states:

Similarly, GCW has decided it will not use the South Plant Line as a backup source of natural gas supply, and the line has been purged with nitrogen, physically disconnected from MRT and severed from other GCW piping.

(USS Ex. 4.0, 3:63-66.)

With regard to the above statements, please provide the following:

- (a) The date the physical disconnection was made to the South Plant Line.
- (b) The location of the physical disconnection from the line with MRT and other GCW piping that was required to be disconnected in connection with the South Plant Line.
- (c) The size (diameter) of all the gas lines and the length of all gas lines that were physically disconnected from the connection with MRT and any of the other GCW piping that was required to be disconnected in connection with the South Plant Line.
- (d) The names and titles of individuals who performed the disconnection work to the South Plant Line.
- (e) Operator qualification records compliant with CFR section 192.807 for the individuals listed in PSP 2.01 (d).
- (f) Anti-Drug testing records compliant with CFR section 199.117 (a) for the individuals listed in PSP 2.01 (d).
- (g) In accordance with Section 192.727 of the CFR, please provide a detailed list of the specific steps taken to disconnect the South Plant gas line from its supply

source and any of the other GCW piping that was required to be disconnected in connection with the South Plant Line.

- (h) A copy of the maintenance procedures as required by CFR Section 192.605 which were followed during the disconnection of the South Plant gas line from its supply source and any of the other GCW piping that was required to be disconnected in connection with the South Plant Line in accordance with Section 192.727 of the CFR.
- (i) How was it determined that all supply sources to the South Plant Line were being physically disconnected?
- (j) Section 192.727 of the CFR specifically addresses abandonment or deactivation of facilities:
  - 1. Identify the requirements of Section 192.727 that US Steel applied and did not apply to the deactivation of the South Plant Line.
  - 2. What was the process used for purging the South Plant Line and any other supply sources in accordance with Section 192.727 of the CFR?
  - 3. Describe the process used to seal all open ends of the South Plant Line and any other supply sources in accordance with Section 192.727 of the CFR.
  - 4. Describe the process used to fill with suitable compaction material the South Plant Line and any other supply sources in accordance with Section 192.727 of the CFR?
  - 5. For those requirements of Section 192.727 of the CFR that were not complied with, please explain why not.
- (k) Any documentation related to the physical disconnection of the South Plant line, including, but not limited to: work orders, preliminary and final plans for the physical disconnection of the South Plant Line pipes, or photographs taken of the process to physically disconnect the pipes or the completed work on the affected South Plant Line pipes that were physically disconnected.
- (l) Any report that was prepared for the abandonment or deactivation of the South Plant Line pipes that were physically disconnected according to Mr. Baker.

**RESPONSE:**

United States Steel Corporation (“U. S. Steel”) objects to this data request because it mischaracterizes the facts, issues, status of this proceeding, and applicable law to the extent it states, suggests, or implies that U. S. Steel should currently have a plan for inspection and maintenance with respect to the lines that have been disconnected and decommissioned (i.e., abandoned), or for any other line or facility at or near Granite City Works (“GCW”), in the

context of the instant proceeding that is ongoing and includes as issues to be addressed in Phase 2 the requirements and content of any such plan for U. S. Steel. U. S. Steel also objects to this data request to the extent it states, suggests, or implies that work conducted on lines or facilities within GCW would be subject to any such requirements, including, but not limited to, CFR Part 192..

U. S. Steel also objects to this data request on the grounds and to the extent that it is not reasonably calculated to lead to the discovery of relevant and admissible evidence. The scope of the instant proceeding is limited to determining whether the Commission has jurisdiction over any lines or facilities of U. S. Steel at or near GCW and, if so, considering “whether [U. S. Steel’s] plan for the inspection and maintenance for each jurisdictional pipeline facility it owns or operates in and near the GCW is adequate to achieve safe operation.” Initiating Order at 6. The Interim Order addressing jurisdiction was specifically determined by the Commission to be an interim, non-final order that is not currently enforceable or appealable. Notice of Commission Action (April 17, 2014). The instant proceeding is not an enforcement proceeding.

U. S. Steel also objects to the extent this data request states, infers, or implies that any line or facility at or near GCW that is not located in a public road or right of way is jurisdictional.

U. S. Steel also objects to this data request to the extent it states, infers, or implies that U. S. Steel admits or otherwise considers any of the fuel lines at or near GCW to be “jurisdictional.” GCW fully reserves all of its rights to challenge and object to the Commission’s rulings on appeal or otherwise, and does not waive any of its prior objections, arguments, or rights in this regard by responding to this data request.

U. S. Steel also objects to this data request to the extent that it requests a legal opinion.

Subject to and without waiving the foregoing objections, U. S. Steel responds as follows:

- (a) The physical disconnection from MRT’s service line was completed on August 11, 2014. The South Plant Line was severed from other GCW piping on February 3, 2015.
- (b) No specific location was required to be disconnected or severed. For the physical disconnection from MRT’s service line, GCW chose to remove a flanged spool piece downstream of MRT’s service line located inside GCW’s building. The other end of the South Plant Line was severed at the closest accessible location inside the GCW fence line located on GCW property. The locations of the actual physical disconnection from MRT and the severed piping from all other GCW piping inside GCW’s fence line is shown by the following Google map images.

The location of the physical disconnection from MRT's service line circled in red here:



The location of the severed piping from all other GCW piping inside GCW's fence line circled in red here:



- (c) No specific length of pipe was required to be disconnected or severed. The size (diameter) of the South Plant Line pipe leaving the GCW building and entering GCW property was all 6" standard pipe. The size (diameter) of the South Plant Line between the MRT's service line connection and the pipe leaving the GCW building was 4" standard pipe, and the entire pipe was located inside the GCW building. GCW physically disconnected the 4" standard pipe from MRT's service line connection inside the GCW building by removing a flanged spool piece approximately eight (8) feet in length. Also, inside the GCW fence line, GCW physically disconnected the 6" standard pipe South

Plant Line from all other GCW piping by cutting and removing (severed) approximately eighteen (18) inches in length of South Plant Line located on GCW property.

- (d) GCW Maintenance Technician Mechanical employees performed the physical disconnection work to the South Plant Line: Dave Holcman, Jeremy Bremberger, Kenny Goodman.

GCW Maintenance Technician Mechanical employees performed the severing from other GCW piping: Dave Holcman, Chuck Green, Billy Green, and Phil Hinch.

- (e) CFR Section 192.807 does not apply. The Company did not perform the decommissioning as a requirement of Part 192 and denies that it is, or was a covered task. Therefore, pursuant to Section 192.801(b)(3), the Company's decommissioning activities were not covered by 192.807. However, the identified individuals are journeyman mechanical technicians properly skilled to execute the task.
- (f) The Company does not interpret Section 199.117(a) to apply pursuant to Section 199.2(c).
- (g) CFR Section 192.727 does not require a detailed list of specific steps to conduct abandonment or deactivation of pipelines. However, the actions GCW did take to discontinue the use of and subsequently abandon in place the South Plant Line were in a manner consistent with activities described in CFR Section 192.727 (b). These actions were: the South Plant Line was disconnected from all sources and supplies of gas; purged of gas; and sealed at the ends.
- (h) CFR Section 192.605 states that "[e]ach operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response," and does not establish a specific requirement for a maintenance procedure for disconnection of a gas line. As noted in U. S. Steel's objection to this data request, the requirements for and content of such a manual of written procedures, if any, are issues to be considered in Phase 2 of this proceeding. U. S. Steel's proposed GCW Inspection and Maintenance Plan, subject to U. S. Steel's objections and reservation of rights, was submitted as Exhibit 4.1 to Mr. Baker's Phase 2 Direct Testimony, Baker Direct ("Dir."), USS Exhibit ("Ex.") 4.0 (Phase 2). CFR Section 192.727 does not contain any specific requirements with respect to the content a "manual of written procedures" per CFR Section 192.605.
- (i) GCW has significant detailed knowledge of its fuel gas system. In addition, a review of GCW drawings A-19082 and A-19921 was conducted to confirm all supply sources to the South Plant Line were physically disconnected. Copies of these drawings were provided to the ICC Staff during their July 8, 2015 site inspection.

- (j) 1. The actions GCW took with respect to the discontinued use and abandoned in place South Plant Line were in a manner consistent with activities described in CFR Sections 192.727(b), 192.727(c) and 192.727(d)(3). These actions were: the South Plant Line was disconnected from all sources and supplies of gas; purged of gas; and sealed at the ends. The remaining sections identified in CFR Section 192.727 would not apply to the discontinued use and abandoned in place South Plant Line. CFR Section 192.727(d)(1) and 192.727(d)(2) did not apply because GCW was the consumer and provided no service to a customer. CFR Section 192.727(e) did not apply because air was not used for purging; GCW used nitrogen for purging. However, consistent with the purging activity described, GCW tested to insure that a combustible mixture was not present after purging. CFR Section 192.727(f) did not apply because the GCW South Plant line contained no vaults. CFR Section 192.727(g) does not apply, as the GCW South Plant Line did not cross over, under or through a commercially navigable waterway.
2. CFR Section 192.727 does not request a description of the process used for purging. However, in a manner consistent with activities described in 192.727(d)(1) and 192.727(e), GCW verified by visual inspection that MRT's service line valve to the South Plant Line was physically closed and locked, purged the South Plant Line with nitrogen, and tested to insure no combustible mixture was present after purging.
3. CFR Section 192.727 does not require a description of the process used to seal all open pipe ends. However, in a manner consistent with activities described in 192.727(b) 192.727(c), and 192.727(d)(3) the actions GCW used to seal all open ends of the South Plant Line and any other supply sources is described below.
- The actions GCW used to seal all open ends on the South Plant Line inside GCW's building was to clean and prepare all flange faces and then install by bolting, a mechanical device (blind flange) with gasket seal to each open end created by the removal of the flanged spool section. The actions GCW used to seal all open ends on the South Plant Line inside GCW's fence line prior to any connections to other GCW piping, was to clean and prepare the open pipe ends for welding, align a 6" standard pipe cap to the open end, deposit the root bead weld while holding the alignment of the cap to the pipe, inspected the root pass for any flaws, and finish the weld with subsequent passes to completely seal the pipe end. The pipe and pipe cap was then wrapped to prevent corrosion.
4. The GCW South Plant line contained no vaults; therefore, CFR Section 192.727(f) requirement to fill abandoned vaults with a suitable compaction material was not applicable.
5. Please refer to response PSP 2.01 (j) (1).

- (k) The information was provided to the ICC Staff during the July 8<sup>th</sup>, 2015 site inspection performed to specifically inspect “the entire “decommissioned...natural gas pipe described as the ‘South Plant Line’”.
- (l) No such reports were prepared.

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**REQUEST NO. PSP 2.02:**

In describing recent changes to operations that have occurred at GCW, Mr. Baker states:

Second, for economic reasons, US Steel has permanently idled the entire Cokemaking process at GCW.

(USS Ex. 4.0, 3:55-6.)

In addition, Mr. Baker further states:

With the permanent idling of the Cokemaking process, there is no by-product fuel (coke oven gas) generated at GCW. The flammable gas supply valves to the COG lines have been closed and the lines purged with nitrogen. These changes were completed earlier this year and have rendered the lines previously referred to as the coke oven gas lines nonfunctional since we no longer used this line for fuel gas.

(USS Ex. 4.0, 3:58-63.)

With regard to the above statements, please provide the following:

- (a) What does Mr. Baker mean by the use of the term "permanently idled"?
- (b) What does Mr. Baker mean by the use of the term "nonfunctional"?
- (c) The date the Cokemaking process was permanently idled.
- (d) The date the flammable gas supply valves to the COG lines were closed.
- (e) The location of the flammable gas supply valves to the COG lines that were closed as part of the idling the Cokemaking process.
- (f) The size (diameter) of all the flammable gas supply valves to the COG lines that were a part of the permanent idling of the Cokemaking process and the length of all gas line that were part of the permanent idling of the Cokemaking process.
- (g) The names and titles of individuals who performed the work to close the flammable gas supply valves to the COG lines.
- (h) Operator qualification records compliant with CFR section 192.807 for the individuals listed in PSP 2.02 (g).

- (i) Anti-Drug testing records compliant with CFR section 199.117 (a) for the individuals listed in PSP 2.02 (g).
- (j) In accordance with Section 192.727 of the CFR, please provide a detailed list of the specific steps taken to close the flammable gas supply valves to the COG lines to permanently idle the Cokemaking process.
- (k) A copy of the maintenance procedures as required by CFR Section 192.605, which were followed during the abandonment or deactivation of the flammable supply valves to the COG lines in accordance with Section 192.727 of the CFR.
- (l) Section 192.727 of the CFR specifically addresses abandonment or deactivation of facilities:
  - 1. Identify the requirements of Section 192.727 that US Steel applied and did not apply to the deactivation of the South Plant Line.
  - 2. What was the process used for purging the South Plant Line and any other supply sources in accordance with Section 192.727 of the CFR?
  - 3. Describe the process used to seal all open ends of the South Plant Line and any other supply sources in accordance with Section 192.727 of the CFR?
  - 4. Describe the process used to fill with suitable compaction material the South Plant Line and any other supply sources in accordance with Section 192.727 of the CFR?
  - 5. For those requirements of Section 192.727 of the CFR that were not complied with, please explain why not.
- (m) Any documentation related to the closing of the flammable gas supply valves to the COG lines, including, but not limited to: work orders, preliminary and final plans for the closing of the flammable gas supply valves to the COG lines, or photographs taken of the process to close the pipes or the completed work on the affected flammable gas supply valves to the COG lines that were closed.
- (n) Any report that was prepared for the abandonment or deactivation of the flammable gas supply valves to the COG lines that were closed according to Mr. Baker.

**RESPONSE:**

United States Steel Corporation (“U. S. Steel”) objects to this data request because it mischaracterizes the facts, issues, status of this proceeding, and applicable law to the extent it states, suggests, or implies that U. S. Steel should currently have a plan for inspection and maintenance with respect to the lines that have been disconnected and decommissioned, or for any other line or facility at or near Granite City Works (“GCW”), in the context of the instant

proceeding that is ongoing and includes as issues to be addressed in Phase 2 the requirements and content of any such plan for U. S. Steel. U. S. Steel also objects to this data request to the extent it states, suggests, or implies that work conducted on lines or facilities within U. S. Steel's GCW would be subject to any such requirements.

U. S. Steel also objects to this data request on the grounds and to the extent that it is not reasonably calculated to lead to the discovery of relevant and admissible evidence. The scope of the instant proceeding is limited to determining whether the Commission has jurisdiction over any lines or facilities of U. S. Steel at or near GCW and, if so, considering "whether [U. S. Steel's] plan for the inspection and maintenance for each jurisdictional pipeline facility it owns or operates in and near the GCW is adequate to achieve safe operation." Initiating Order at 6. The Interim Order addressing jurisdiction was specifically determined by the Commission to be an interim, non-final order that is not currently enforceable or appealable. Notice of Commission Action (April 17, 2014). The instant proceeding is not an enforcement proceeding.

U. S. Steel also objects to the extent this data request states, infers, or implies that any line or facility at or near GCW that is not located in a public road or right of way is jurisdictional.

U. S. Steel also objects to this data request to the extent it states, infers, or implies that U. S. Steel admits or otherwise considers any of the fuel lines at or near GCW to be "jurisdictional." GCW fully reserves all of its rights to challenge and object to the Commission's rulings on appeal or otherwise, and does not waive any of its prior objections, arguments, or rights in this regard by responding to this data request.

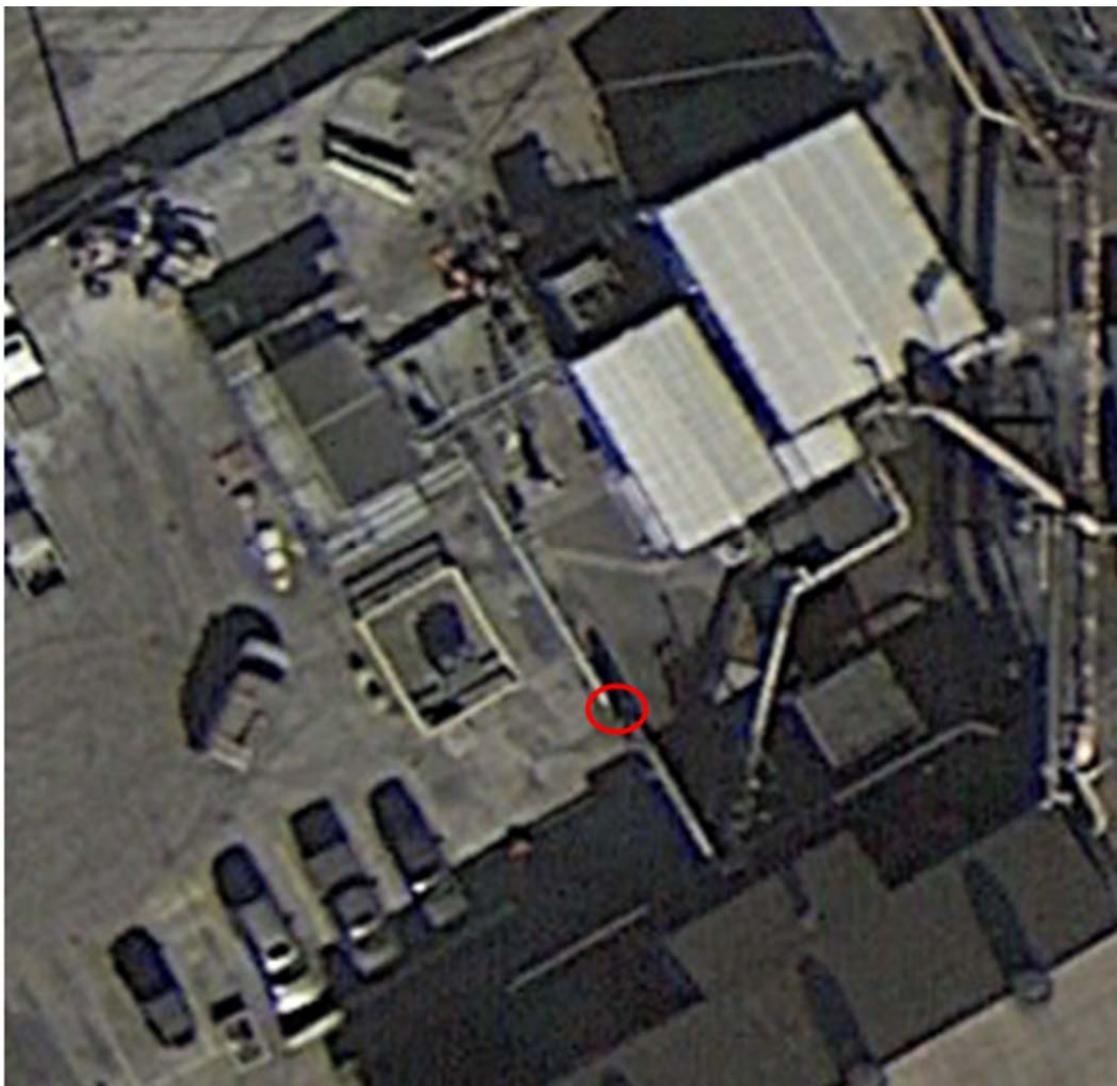
U. S. Steel also objects to this data request to the extent that it requests a legal opinion.

U.S. Steel objects to this data request to the extent it mischaracterizes Mr. Baker's testimony. USS Ex. 4.0, 3:58-63 does not state flammable gas supply valves to the COG **lines** have been closed and the **lines** purged with nitrogen (emphasis added). The correct testimony is "The flammable gas supply valves to the COG line have been closed and the line purged with nitrogen."

Subject to and without waiving the foregoing objections, U. S. Steel responds as follows:

- (a) The phrase "Permanently idled" was used to mean not temporary or changing, forever not working, active, or being used.
- (b) "Nonfunctional" was used to mean not performing or not able to perform a regular function. Specifically to the coke oven gas line, it means the line has been abandoned in place.
- (c) The coke oven batteries (Cokemaking process) shutdown process (permanently idled) was started on March 2, 2015 and completed on March 3, 2015.
- (d) The date the flammable gas supply valves to the COG line were closed specifically referenced in USS Ex. 4.0 was March 4, 2015.

- (e) The location of the flammable gas supply valves to the COG line specifically referenced in USS Ex. 4.0 was inside the GCW fence line on GCW property, see attached Google map. The supply valves closed were located in the red circle in the below picture:



- (f) The size (diameter) of the flammable gas supply valves to the COG line specifically referenced in USS Ex. 4.0 were standard 12” valves. Also, as a result of the permanent idling of the Cokemaking process, GCW has physically removed approximately 89 feet of the line from the COG distribution center and a portion of the COG line. The ICC Staff physically viewed the removed line and supply valves during their July 8, 2015 site inspection.
- (g) GCW Operating Technician employees who performed the closing of the COG supply valves to the COG line are Ken Buford and Al Williams.
- (h) CFR Section 192.807 does not apply. The Company did not perform the decommissioning as a requirement of Part 192 and denies that it is a covered task.

Therefore, pursuant to Section 192.801(b)(3), the Company's decommissioning activities were not covered by 192.807. However, the identified individuals are operating technicians properly skilled to execute the task.

- (i) The Company does not interpret Section 199.117(a) to apply pursuant to Section 199.2(c).
- (j) This question mischaracterizes the Cokemaking process. To clarify, GCW's coke oven gas was a by-product of the Cokemaking process. The coke oven gas that was generated by the Cokemaking process did not flow from the COG line to the permanently idled Cokemaking process. Instead, the gas flowed from the Cokemaking process to the COG distribution center to the COG line.  
CFR Section 192.727 does not require a detailed list of specific steps taken to conduct abandonment or deactivation of pipelines or to close flammable gas supply valves. However, the actions GCW did take to prevent the flow of coke oven gas and subsequently make the supply valves nonfunctional or abandon in place the COG line were done in a manner consistent with activities described in CFR Section 192.727(d) (1). Specifically, these actions were: the supply valves were closed to prevent the flow of gas into the COG line and the Energy and Ironmaking Utilities Department placed a safety lock device to prevent the opening of the supply valves.
- (k) CFR Section 192.605 states that "[e]ach operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response," and does not establish a specific requirement for a maintenance procedure for making a gas line or supply valves nonfunctional. As noted in U. S. Steel's objection to this data request, the requirements for and content of such a manual of written procedures, if any, are issues to be considered in Phase 2 of this proceeding. U. S. Steel's proposed GCW Inspection and Maintenance Plan, subject to U. S. Steel's objections and reservation of rights, was submitted as Exhibit 4.1 to Mr. Baker's Phase 2 Direct Testimony, Baker Direct ("Dir."), USS Exhibit ("Ex.") 4.0 (Phase 2). CFR Section 192.727 does not contain any specific requirements with respect to the content a "manual of written procedures" per CRF Section 192.605.
- (l) In this Section (l), it appears Staff misstated the data request by referencing the "South Plant Line." GCW will replace the words "South Plant Line" with "COG line" and respond accordingly.
  - 1. The testimony does not state that the COG line had been "deactivated" but stated "nonfunctional." The actions GCW took to make nonfunctional (abandoned in place) the COG line were in a manner consistent with activities described in CFR Sections 192.727(b), 192.727(c) and 192.727(d)(3) were as follows: the COG line was disconnected from all sources and supplies of gas; purged of gas; and sealed at the ends. The remaining sections identified in CFR Section 192.727 would not apply to the nonfunctional (abandoned in place) COG line.

CFR Section 192.727(d)(1) and 192.727(d)(2) did not apply because GCW was the consumer and provided no service to a customer. CFR Section 192.727(e) did

not apply because air was not used for purging; GCW used nitrogen for purging. However, consistent with the purging activity described, GCW tested to insure that a combustible mixture was not present after purging. CFR Section 192.727(f) did not apply because the COG line contained no vaults. CFR Section 192.727(g) did not apply, as the COG line did not cross over, under or through a commercially navigable waterway.

2. CFR Section 192.727 does not request a description of the process used for purging. However, in a manner consistent with activities described in 192.727(d)(1) and 192.727(e), GCW verified by visual inspection that the supply valves to the COG line were physically closed and locked, purged the COG line with nitrogen, and tested to insure no combustible mixture was present after purging.
  3. CFR Section 192.727 does not require a description of the process used to seal all open pipe ends. However, in a manner consistent with activities described in 192.727(b) 192.727(c), and 192.727(d)(3) the actions GCW used to seal all open ends of the COG line are described below. The actions GCW used to seal the open ends on the COG line was to clean and prepare all flange faces and then install by bolting, a mechanical device (blind flange) with gasket seal to each open end created by the removal of the 89 feet flanged section describe in (f) above.
  4. The COG line contained no vaults; therefore, 192.727(f) requirement to fill abandoned vaults with a suitable compaction material was not applicable.
  5. Please refer to response PSP 2.02 (l) (1).
- (m) The information responsive to this request was already provided to the ICC Staff during the July 8<sup>th</sup>, 2015 site inspection.
- (n) No such reports were prepared.