U.S. Department
of Transportation
**Research and
Special Programs
Administration**

Southern Region, Pipeline Safety

Atlanta Federal Center
Suite 16 T 15
100 Alabama St., SW
Atlanta, GA 30303-3104

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 30, 1997

Mr. William Rome
Vice President of Operations
Florida Gas Transmission Company
P. O. Box 1188
Houston, TX 77251-1188

CPF 27100-C

Dear Mr. Rome:

On May 22-24, June 24-28, August 5-8, and October 28-November 1, 1996, a representative of the Southern Region, Office of Pipeline Safety, inspected your pipeline facilities and reviewed all records in the Orlando and Tallahassee Regions. As a result, there were some areas of concern.

Please consider the following:

1. **Compressor Station Piping Support**
   The concrete piers supporting the above ground piping for the blow-out pigging had developed cracks in and around the anchor bolt areas at Wiggins compressor station. Although recommendations had been made to repair the piers, no repairs had been budgeted for at the time of inspection.

2. **Atmospheric Corrosion**
   Atmospheric corrosion, ranging from surface rust to light pitting, was found at Wiggins and Caryville compressor stations. At the time of inspection, the painting had been budgeted and Superintendent was awaiting bids.

3. **Right-Of-Way Clearance**
   Florida Gas Transmission's right of way clearance program has not kept pace with the growth of vegetation at several locations. The right of way at Mt. Vernon (leaving the

   compressor station), Perry (at blk valve 15-1), and Lakeland-McIntosh meter station was overgrown to the extent that land patrolling would be ineffective in determining

the surface conditions on or adjacent to the right of way.

4. **Pipe-to-Soil Readings**
   Although Florida Gas uses 850 - 3500mv as a range/guide for the level of cathodic protection throughout the company, some readings were up in the 4000-5000mv range. Pipeline inspection reports were reviewed where pipe was dug up to investigate the affect of the high pipe-to-soil readings on the coating of the pipe and the coating was found intact. In case of unexpected high pipe-to-soil readings at certain locations, the pipeline coating should be checked for sufficient adhesion/bondment.

5. **Test Stations**
   §192.469 and §192.471 require that each pipeline must have sufficient test stations and that each test lead wire be connected to the pipeline, respectively, to determine and ensure adequate cathodic protection. At Orlando, Lakeland, and Safety Harbor, several CP reports showed broken and/or no test leads for two to three consecutive years. No follow-up action report was available to inform if there was an intent to replace or delete test stations.

6. **Monitoring of Casings**
   Pipeline Safety Regulations require pipelines to be electrically isolated from metallic casings, and that inspection and electrical tests must be made to assure that electrical isolation is adequate. All casings must be monitored for electrical isolation in order to comply with the regulations. A review of your 1996 records indicated that two casings were found and added on Clearwater North @ .6260 test pt. and Clearwater South @ .0030 test pt. at Safety Harbor.

7. **Rectifiers**
   Rectifiers must be inspected six times each calendar year, with intervals not to exceed 2 and ½ months. Seven rectifiers at Lakeland and four rectifiers at Safety Harbor were inspected only five times 1995. Since a change in personnel, the 1996 records showed much improvement.

8. **Class Location Maps**
   Class Location Maps and any pertinent information relating to them must be maintained so as to reflect the applicable testing requirements of Subpart J of Part 192 regulations and other operating needs of the pipeline. Pipeline density reports for certain locations were not available at Brooker.

We hope you will consider these areas of concern and take action to further improve your present level of safety. If we can answer any questions or be of any help, please call (404) 562-3530.

Sincerely,

Frederick A. Joyner
Director, Southern Region
Office of Pipeline Safety

cc: Compliance Registry, OPS Headquarters
File: Florida Gas Transmission Company