

LETTER OF CONCERN

August 20, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Colonial Pipeline Company
Attn.: Mr. W. D. Scott
Senior Vice President & Chief Operations Officer
945 E. Paces Ferry Rd.
Atlanta, GA 30326

CPF NO. 28507C

Dear Mr. Scott:

As a result of Colonial's March 30, 1998, 40" Line 01 gasoline leak in the Morgan Falls Landfill in north Fulton County, GA., representatives of the Office of Pipeline Safety (OPS), Southern Region Office, reviewed Colonial's actions and pipeline records relating to the incident. In the course of the investigation, items were brought to my attention that are cause for concern. They are:

Leak Call Handling and Response:

1. The first notice of a possible leak in the Morgan Falls landfill area was attempted, via an individual's phone call to your main office switchboard on an emergency line, at 15:48 on the day of the leak discovery. The caller was not asked the reason for the call, and the call was assumed to be (and thus was classified as) a non-emergency call. Instead of the caller being asked for their name and phone number, and being immediately transferred to the control center as required for an emergency call, the individual was given the name and office phone number of a field employee (the Chattahoochie office right of way inspector).

Personnel who receive incoming calls on the emergency phone lines need to understand the importance of positively ascertaining the purpose of the call and questioning the caller, if required, to correctly classify the call. We also recommend that you add a statement on the switchboard emergency call handling procedure, requiring the person to first ascertain the purpose of the call.

Patrol Pilot and District Communication:

2. Colonial's procedures currently provide for the patrol pilot to discontinue reporting of certain right of way conditions, if notified by district personnel that there is no longer a need to continue reporting the condition(s). Our concerns are : 1) the patrol pilot may become accustomed to observing ongoing activities in the vicinity of the pipeline, and therefore fail to report unapproved activities that could adversely affect the pipeline, and 2) rotation, turnover, and substitution of right of way patrol and inspection personnel (district and aerial) present a potential for misunderstanding or mis-communication relating to allowed activities on the right of way, and allowed discontinuance of reporting observed conditions.

3. The patrol pilot is no longer able to communicate directly with mobile ground personnel in most of the metro Atlanta area. We encourage you to investigate ways to further facilitate pilot to ground communications.

Land Use at Morgan Falls Landfill:

4. The 1978 Fulton County right of way easement granting Colonial pipeline rights through the Morgan Falls landfill states the easement “. . . shall not restrict or impair the ingress and egress of Grantors crossing over said easement with their equipment, in the free use of its property for a landfill.” Our concern is that Colonial be aware of, and take appropriate actions to address the easement, or any agreement relating to property use that could compromise pipeline integrity.

Encroachments:

5. Your right of way encroachment procedures do not specify conditions under which the Right of Way Coordinator should request an engineering review or analysis prior to approval of certain encroachment proposals (proposed off-road heavy equipment or vehicle crossings, extreme fill over the pipeline, etc.). As a result, a needed engineering review may not occur.

We hope you will consider these areas of concern and consider them constructive to pipeline safety. If we can answer any questions or be of any assistance, please call me at (404) 562-3530.

Sincerely,

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

cc: Compliance Registry, OPS Headquarters