

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 18, 1999

Mr. Jerry Robinson
Vice President Communications, Paper
Georgia Pacific Corporation
P.O. Box 3333
Crossett, AR 71635

CPF No. 27114W

Dear Mr. Robinson:

On October 14 and 15, 1997, a representative of the Southern Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your natural gas transmission pipeline located in north Louisiana and south Arkansas, and reviewed your pipeline records at Crossett, Arkansas.

As a result of the inspection, it appears that you have committed probable violations as noted below of pipeline safety regulations Title 49, Part 192, Code of Federal Regulations.

The items inspected and the probable violations are:

1. **§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 inspections of exposed pipelines for atmospheric corrosion required of §192.481 for the pipeline blowoff valve assemblies, Georgia-Pacific Corporation meter and regulator station, and pigging facility piping were not documented, as required of §192.491(c).

2. **§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.**

(b) **The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:**

Class location of line	Maximum interval between patrols	
	At highway and railroad crossings	At all other places
1, 2	7 1/2 months; but at least twice each calendar year.	15 months; but at least once each calendar year.
3	4 1/2 months; but at least four times each calendar year	7 1/2 months; but at least twice each calendar year.
4	4 1/2 months; but at least four times each calendar year.	4 1/2 months; but at least four times each calendar year.

The 1996 class one highway crossing patrols (La. Hwy. 543) were performed on 2/1/96 and 10/1/96, thus exceeding the maximum allowed interval between these patrols (7-1/2 months) by 1/2 month. Similarly, the class three “at all other places” patrols, performed on the same dates, exceeded the maximum allowed interval by 1/2 month.

3. **§192.706 Transmission lines: Leakage surveys.**

Leakage surveys of a transmission line must be conducted at intervals not exceeding 15 months, but at least once each calendar year. However, in the case of a transmission line which transports gas in conformity with §192.625 without an odor or odorant, leakage surveys using leak detector equipment must be conducted—

(a) **In Class 3 locations, at intervals not exceeding 7 1/2 months, but at least twice each calendar year; and**

Leakage surveys using leak detector equipment were not performed in 1995, 1996, or prior

to the safety inspection in 1997, on the 2½ mile unodorized class three pipeline segment located between AR Highway 133 and the Georgia Pacific meter station, as required of §192.706(a).

4. §192.709 Transmission lines: Record keeping

Each operator shall maintain the following records for transmission lines for the periods specified:

(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

Records could not be found indicating that class three highway and railroad crossings (Ark. Hwy. 133, US Hwy. 82, and A&LM Railroad crossings) were patrolled at least four times per year (§192.705(b)), as required of §192.709(c), in 1996.

5. §192.603 General provisions.

(b) Each operator shall keep records necessary to administer the procedures established under §192.603.

Corrosion control procedures were not available at Crossett during the safety inspection, as required of §192.603.

Under 49 United States Code § 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

We have reviewed the circumstances and supporting documents involved for the probable violations in this case, and have decided not to assess you a civil penalty. Because of the good faith you have exhibited up to this time, we expect that you will act to bring your operations into compliance with pipeline safety regulations.

Sincerely

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

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cc: Compliance Registry, OPS Headquarters