



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

Southern Region, Pipeline Safety

Atlanta Federal Center
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Atlanta, GA 30303-3104

WARNING LETTER LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 8, 1997

Plantation Pipeline Company
Attn: Mr. Lewis Jester
P. O. Box 18616
Atlanta, GA 31126-0616

CPF No. 27509-W

Dear Mr. Jester,

Several days between March and November 1997, Rod Seeley, a representative of the Southern Region Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspections at your area offices and subsequent field locations.

As a result of the inspections, it appears that you have committed probable violations as noted below of pipeline safety regulations Title 49, Code of Federal Regulations, Part 195.

The probable violation is:

Item 1 §195.428 Over pressure safety devices. (a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7 ½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

During the inspection, the following records were found:

Location	Function	Date	Comment
Yanceyville 14W	Regulate	4/30/96 10/28/97	Record 51463, exceed interval
Greensboro 14W	Regulate	4/30/96 10/28/97	Record 50605, exceed interval
Salisbury BRF	Regulate	10/24/95 1/2/97	Record 50518, missed calendar year
Hattiesburg 8PE	Regulate	7/1/96 4/9/97	Record 11417, exceed interval
Greensboro 14W	Trip	4/30/96 10/28/97	Record 53531, exceed interval
Greensboro 14W	Trip	4/30/96 10/28/97	Record 50532, exceed interval

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 documentation involved in the above probable violation and have decided not to assess Plantation Pipe Line Company a civil penalty. We advise you, however, that should you not correct the circumstances leading to the violations, we will take enforcement action when and if the continued violation comes to our attention.

During the inspection, several areas came to our attention which have caused some concern. We hope you will give these areas your attention.

It is required that each operator determine whether the cathodic protection is adequate. It is generally accepted that the best method for doing this is meeting or exceeding the latest professional standard. It has been recognized that NACE RPO 169-96 is the leading standard for preventing corrosion control. NACE standards are reaffirmed, revised, or withdrawn at least every five years and users are cautioned, by NACE, to obtain the latest edition. The 1996 NACE standard (and also included as part of the gas pipeline standard Part 192 appendix D) requires the operator to determine cathodic protection levels free of voltage (IR) drops other than those across the structure-electrolyte boundary. Through discussions with the Engineering Associates it can be concluded that Plantation Pipe Line is not considering voltage drop, either through measuring or calculation, in their corrosion control program. Plantation does not take "instant-off" readings nor do they perform any other test in consideration of IR drop. By not considering the IR drop the operator may be putting their pipeline at risk.

Plantation has had a high rate of turn-over within their Engineering Associate positions. Close to half of the Engineering Associates have less than two years of experience within the Corrosion Control industry. In addition, the Code Compliance/Pipeline Engineer, primary person responsible for establishing the company's guidelines related to corrosion control, received his introductory course to corrosion control earlier this year. It is hoped that Plantation will recognize the importance of a well trained staff and take on an aggressive program to train its personnel in the latest corrosion control design, construction and maintenance practices.

Plantation's primary DOT record keeping mechanism is the Scheduled Maintenance program. This is a computerized database that tracks required maintenance and can also be used to generate reports to document the required testing and inspections. The recent field inspection revealed several problems with this program: Several items were miss labeled, inappropriately identifying its function (relief valve identified as control valve); Several of the protection devices had the wrong pressure set point listed in the record, misrepresenting the actual set point. ; Several of the task descriptions incorrectly identified the test or inspection that was performed, implying that more was being done than actual. Plantation should review this program and correct the errors to properly document the tests and inspections they are performing.

You will not hear from us again with regard to the noted inspection and subsequent action. It appears that Plantation is putting forth a significant effort to meet all the requirements of §195, but the documentation detracts from that effort. I hope you will consider these areas of concern and comments as constructive relating to pipeline safety.

Please refer to CPF 27509-W in any correspondence or communication on this matter.

Sincerely,

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

Rod/sd/DPS-25/12/8/97
file: CPF 27509W Plantation Pipeline
c:\wpwin\sd\compliance\cpf27509.wlr
cc: DPS-20, Regions, Rod

cc Compliance Registry, OPS Headquarters