

LETTER OF CONCERN

December 8, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Don Hahn
Vice President, Operations
ST Services
17304 Preston Road
Suite 1000
Dallas, Texas 75252-5623

CPF NO. 29604C

Dear Mr. Hahn:

On November 8-10, 1999, representatives of the Southern Region, Office of Pipeline Safety, pursuant to chapter 601 of 49 United States Code, inspected pipeline facilities of ST Services. The records were reviewed at your Homestead, Florida office. The review revealed the following areas of concern:

1. Operation & Maintenance Procedures Manual

A review of ST Services's procedural manual revealed that the manual needs to be revised in the following areas of operation & maintenance.

- ! Change MAOP to MOP (Pages: 4-2, 4-3, 4-4,4-5, 4-6, 4-7, 3.6)
- ! Section 7.14, page 7-13 states that no scraper/sphere facilities associated with this pipeline. This statement should be changed as there is a pig trap at the metering station.
- ! Add the correct year of the hydrotest in section 7.3, maximum operating pressure.
- ! The section 3.6, minimizing potential hazards, should be changed to reflect that Everglades Pipeline is protecting ST Services's over pressurization and maintaining and checking the pressure limiting devices.
- ! The section 7.2.3 states that ST Services will maintain daily operating records that include the discharge pressure at the pump, etc. This statement should be changed as Everglades Pipeline is maintaining these daily

operating records.

- ! The procedure on Safety Related Condition, section 6.1, should include supplemental and follow up reports.
- ! You have 2138 feet of 8-inch & 10-inch pipelines in Broward county. This segment should be a part of your operation and maintenance manual, damage prevention plan and public education program.
- ! Section 7.9, Item d, deals with the bare steel pipe. Since S.T. Services does not have bare steel pipe, this section should be deleted.

2. Corrosion Control Measures

- ! Shorted Casing:
 1. Your 1999 pipe-to-soil monitoring records on your Broward County ten inch pipeline segment and subsequent field check indicated a possible metallic short.

T/S @ Elbow between T/S # 1 & S.E. 24th Street: P/S: -0.979 V,
C/S: -0.979 V
Date of reading, 11/10/99

2. Field check on your six-inch line in Dade County indicated a possible short at the following locations:

I. S.W. 88 St. & Metrorail: P/S: -0.989 V, C/S: -0.988 V
II. S.W. 56 St. and S.W. 72 Ave.: P/S: -1.13 V, C/S: -0.97 V
Date of reading: 11/9/99

I understand that the above issues and comments were covered in the exit interviews with respective field management personnel, and were constructively received. I hope you also will consider these areas of concern and comments as constructive relating to pipeline safety.

If we can answer any questions or be of any help, please call us at (404) 562-3530.

Sincerely,

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

cc: Compliance Registry, OPS headquarters
John Stanley, S.T. Services