



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 1, 2007

Mr. Kevin C. Weyer, President
UCAR Pipeline, Incorporated
1000 County Road 340
Angleton, TX 77515-7515

CPF 4-2007-1006W

Dear Mr. Weyer:

On March 20-22, September 11-15, and October 10, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your UCAR Pipeline System.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

1. §192.707 Line markers for mains and transmission lines.

(a) *Buried pipelines.* Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:

(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.

UCAR has does not have an adequate number of pipeline markers along the right-of-way to clearly identify the location of the transmission line.

At various locations along the pipeline right-of-way between Lake Charles, LA and Texas City, TX, the location of the pipeline cannot easily be determined from the UCAR pipeline markers. In many cases adjacent markers cannot be seen when standing at a given pipeline marker making it difficult to determine the pipeline route. UCAR needs to install additional pipeline markers so that the location of the transmission line is clearly identified.

2. 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices.

The UCAR procedures for startup/shutdown of pipeline facilities are not adequate. The UCAR procedures for startup/shutdown of the pipeline system deal mainly with hazardous air/fuel mixtures and purging. UCAR operations personnel have stated that the pipeline is fully automated and that field operations personnel have no need for startup/shutdown procedures. However, the regulations require at least a basic description of the procedures used to start and stop pipeline operations including basic field equipment checks, ensuring protection of the MAOP, and responding to abnormal operating conditions that may occur during the process.

3. 192.743 Pressure limiting and regulating stations: Capacity of relief devices.

(a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in §192.739(b), the capacity must be consistent with the pressure limits of §192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.

(b) If review and calculations are used to determine if a device has sufficient capacity, the calculated capacity must be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates. After the initial calculations, subsequent calculations need not be made if the annual review documents that parameters have not changed to cause the rated or experimentally determined relieving capacity to be insufficient.

UCAR did not produce annual documentation indicating that the parameters under which the relief valve capacity was sized have not changed thereby eliminating the need for additional calculations.

The original relief valve calculations as well as some subsequent determinations that the operational parameters under which the relief valves were sized were present in the UCAR records. However, documentation for the annual determination over the past five years that the

operational conditions used to originally size the relief valves has not changed, was not found in the UCAR files. UCAR needs to ensure that this annual check is performed and documented.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violations persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Be advised that failure to do so will result in UCAR Pipeline, Inc. being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2007-1006W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,



R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous
Materials Safety Administration