

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 12, 1999

Mr. William Thacker
President
Texas Eastern Products Pipeline Company
2929 Allen Parkway
Houston, TX 77019

CPF No. 19504C

Dear Mr. Thacker:

Between the dates of June 1 and June 10, 1999, a representative from the Eastern Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite inspection of your pipeline and records in the Eagle and Greensburg, Pennsylvania areas. During that inspection, several items of concern were noted as in need of your attention.

1. § 195.262 Pumping Equipment.

The following must be provided in each pump station:

- (1) Safety devices that prevent overpressuring of pumping equipment, including the auxiliary pumping equipment within the pumping station.
- (2) A device for the emergency shutdown of each pumping station.
- (3) If power is necessary to actuate the safety devices, an auxiliary power supply.

Although there was an Emergency Shutdown Switch at Jack's Station, the labeling was not sufficiently obvious.

2. **§ 195.401 General Requirements.**

- (b) **Whenever an operator discovers any condition that could adversely affect the safe operation of its pipeline system, it shall correct it within a reasonable time. However, if the condition is of such a nature that it presents an immediate hazard to persons or property, the operator may not operate the affected part of the system until it has corrected the unsafe condition.**

At Rt. 56, MP 93.4, the pipe is exposed above the water level in the creek. It appears that large stones were swept down the creek and settled against your pipe. The pipe is in danger of being damaged if action is not taken to protect it (see attached June 1998 photo).

3. **§ 195.412 Inspection of rights-of-way and crossings under navigable waters.**

- (a) **Each operator shall, at intervals not exceeding 3 weeks, but at least 26 times each calendar year, inspect the surface conditions on or adjacent to each pipeline right-of-way. Methods of inspection include walking, driving, flying, or other appropriate means of traversing the right-of-way.**

The right-of-way at Polecat Rd. in Delaware County at the Polecat Rd. rectifier is overgrown and entirely covered with trees and saplings. The same condition exists for the right-of-way at the western bank of the Susquehanna River at the west side of the railroad tracks. It would be difficult to traverse the pipeline by foot, yet alone do a visual survey by air.

4. **§ 195.416 External corrosion control.**

- (i) **Each operator shall clean, coat with material suitable for the prevention of atmospheric corrosion, and, maintain this protection for, each component in its pipeline system that is exposed to the atmosphere.**

Corrosion was developing on the above ground piping at:

- a. Rochester Mills, at both the suction and discharge piping.
- b. Weirton Station, where corrosion was forming under the support pads.
- c. Mundy's Corner, at the strainer.

5. § 195.436 Security of facilities.

Each operator shall provide protection for each pumping station and breakout tank area and other exposed facility (such as scraper traps) from vandalism and unauthorized entry.

At both Jack's Station and at Moshannon Remote Station, there is approximately 12-18 inches of separation between the cyclone fence and the ground at various locations. At these locations there is inadequate protection against unauthorized entry and vandalism (see photos).

These items were thoroughly discussed with your representatives during the inspection. Based on this discussion it is our expectation that remedial measures will be taken to rectify these situations.

Should you have any questions regarding these issues, or any other pipeline safety regulatory issues, please do not hesitate to contact John Firely in our New Jersey District Office at (609) 989-2179 or the Eastern Region Office in Washington, DC at (202) 366-4580. I would appreciate your comments on the above within 45 days of receipt of this letter.

Sincerely,

William H. Gute
Director, Eastern Region
Office of Pipeline Safety

Enclosures

JFIRELY/sj/DPS-24/(609) 989-2179/8/12/99
FILE: CPF No. 19504C./Letter of Concern
d:\data\wpwin\sj\locltrs\cpf19504c.jf.wpd
cc: DPS-22.1, DPS-24, NJDO, MEDO, PIDO, Regions
Electronic File copy to Catrina Pavlik, DPS-23