

LETTER OF CONCERN

December 6, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James Pasternak
Manager
Central Florida Pipeline Corporation
2101 GATX Drive
Tampa, Florida 33605

CPF NO. 29603C

Dear Mr. Pasternak:

On November 15-19, 1999, representatives of the Southern Region, Office of Pipeline Safety, pursuant to chapter 601 of 49 United States Code, inspected pipeline facilities of the Central Florida Pipeline Corporation (CFPL). The records were reviewed at your Tampa, Florida office. The review revealed the following areas that are cause for concern:

1. **Operation & Maintenance Procedures Manual.** In reviewing CFPL's procedural manuals for the 16-inch & 10-inch lines, it was noted that both manuals need to be revised in the following areas of operation & maintenance.

- ! Update procedures on river crossings for the 10 inch and 16 inch pipelines. There is no navigable river crossing on the 10 inch pipeline and no inspection is possible on the directionally drilled crossings on the 16 inch pipeline.(Page 48, section 3)
- ! Add hydrostatic testing frequency policy in fire fighting equipment procedures.
- ! Add Spanish language as a part of your public education program in section 21 of your 10 inch Pipeline System Procedures Manual.
- ! Add, NACE Standard TM-01-69 in your Internal Corrosion section if this standard is being followed.

2. **Internal Corrosion Control.** Your internal corrosion control coupon should be checked and evaluated twice each calendar year and not to exceed 7 ½ months. In 1998, you inspected your coupons only once.

3. **Corrosion Control Measures**

- ! In reviewing your cathodic protection monitoring records and subsequent field check, the following test stations showed an unsatisfactory level of cathodic protection.

16 inch line: Test stations numbers 100, 101, and 102 measured less than 850 millivolts.

Test Station 100: P/S: -0.775 Volts
Test Station 101: P/S: -0.807 Volts
Test Station 102: P/S: -0.820 Volts

- ! Your pipe-to-soil monitoring records for the 16 inch line showed an unsatisfactory level of cathodic protection at several valve locations. The cathodic protection levels showed no anodic areas on the pipeline segments in question. The net protective current approach indicated appropriate pipe-to-soil potentials with IR drop free readings. In the future, CFPL should use side drain readings at the valve locations where grid and electrical conduit systems make it impossible to obtain representative p/s potential readings.
- ! CFPL should evaluate and take appropriate corrective action with regards to the suspected interference problem at test station 100 on the 16 inch line. A Florida Gas Transmission pipeline crossing, at this location, is probably depressing the expected cathodic protection level.

P/S: -1.563 (Florida Gas Transmission)
P/S: - 0.775 (CFPL)

- ! In reviewing your 1999 rectifier inspection records for the 10 inch line, no records were found for rectifiers #1 and #2 for the month of Feb. 99 and no records were found for rectifiers #1, #2, #3, and #5 for the month of Sept. 99.
- ! You should consider IR drop when doing your annual pipe-to-soil monitoring as a part of RPO-169-96, NACE Standard.
- ! An improved identification method should be utilized to locate your test stations for monitoring and maintaining purposes.

- ! Test station and vent pipe # 104 on the 10 inch line was found damaged, during the field inspection. This needs to be repaired or replaced.
- ! Shorted Casing: Your 1999 P/S monitoring records indicate a possible short at test station # 56 on 16-inch line. P/S: -0.704V, C/S: -0.696V
- ! Prompt remedial action needs to be taken to fix the problem of low voltages found during cathodic protection test. The following test stations have had low readings for three years, 1997, 1998 and 1999.

Test Station # 59 on the 16-inch line:

Top test lead: -0.438V, -0.644V, -0.648V
Third test lead: -0.319V, -0.311V, -0.209V
Bottom test lead:-0.624V, -0.611V, -0.542V

- ! A prompt remedial action should also be taken for low p/s potential readings at Test Station no's:104, 107, and 133.
(16-inch line)

4. **Breakout Tanks.**, It appears that your tanks at Hemlock and Tampa pump stations meet the definition of a breakout tank, from a jurisdictional standpoint, regardless of volume or capacity. These two tanks should be inspected under Part 195 and API Standards.

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 take appropriate action.

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