

From: [Dahlinger, Barbara \(PHMSA\)](mailto:Dahlinger, Barbara (PHMSA))
To: [Dahlinger, Barbara \(PHMSA\)](mailto:Dahlinger, Barbara (PHMSA))
Subject: RE: ISPC Notice of Amendment CPF 1-2012-5008M
Date: Tuesday, July 03, 2012 5:18:12 PM

From: Michelle Denault [\[mailto:mddenault@gmail.com\]](mailto:mddenault@gmail.com)
Sent: Tuesday, July 03, 2012 9:48 AM
To: Coy, Byron (PHMSA)
Subject: ISPC Notice of Amendment CPF 1-2012-5008M

Dear Mr. Coy,

Please find attached pdfs of Interstate Storage & Pipe Line Corporation's Standard Operating Procedures which were modified in response to the Notice of Amendment, CPF 1-2012-5008M. The paper copies of these files should arrive in the mail after the holiday.

In response to item 1, the following Standard Operating Procedures were modified to include details on requalification intervals and additional abnormal operating conditions:

- Pipeline Shipment Procedures For Transfer
- Annual, Accident, and Safety-Related Condition Reporting
- Welding
- Repair or Removal of Weld Defects
- Pump Information
- Pressure Test
- Operations and Maintenance Procedures
- Idling/Abandoning the Line
- Abnormal Operating Condition Procedure
- Maximum Operating Pressure
- Communication (Control Center)
- Pipeline Marker Inspection (Line Markers)
- Right-of-Way Inspection (Inspection of the Right-of-Way)
- Block Valve Inspection (Valve Maintenance)
- Pipeline Repair
- Pipe Movement Procedure
- Scraper and Sphere Facility Procedure
- Fire Fighting Equipment
- Security of the Facility
- Smoking or Open Flames
- Damage Prevention Program
- Overview – Pipeline Inspections (Visual)
- Pipeline Coating & Inspection
- Test Station Leads & Boxes
- Examination of Exposed Portions of the Pipeline
- Annual Survey (Pipe to Soil Survey)
- Rectifier
- Insulated Gasket (Flanges)

In response to item 2, the Standard Operating Procedure titled "Emergency Procedures" is enclosed to address the requirement for a procedure in the O&M

manual which provides details as to how to receive, identify, and classify notices of events.

In response to items 3 & 4, the Standard Operating Procedure titled “Cathodic Protection & NACE Standard” was modified to include details on the qualifications required for supervisors and the criteria used during annual cathodic protection surveys.

These modifications will resolve the inadequacies found with Interstate Storage & Pipe Line Corporation’s plans or procedures in accordance with 49 CFR Part 195 requirements and Pipeline and Hazardous Materials Safety Administration’s findings. If you require more in regards to CPF 1-2012-5008M, please contact me directly.

Thank you,

Michelle Denault
Regulatory Compliance Manager
Interstate Storage & Pipe Line Corporation
mbdenault@gmail.com
401-383-2022