



RECEIVED MAY 24 2011

May 23, 2011

Pipeline and Hazardous Materials Safety Administration  
Central Region  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

Attention: Mr. David Barrett  
Director, Central Region

Re: Notice of Probable Violation and Proposed Civil Penalty  
Guardian Pipeline Company  
CPF 3-2011-1007

Dear Mr. Barrett:

In response to the Notice of Probable Violation and Proposed Civil Penalty CPF 3-2011-1007 dated April 25, 2011, Guardian Pipeline Company (GPL) submits the following regarding the issues brought forth from the inspection of GPL records and facilities of Guardian Pipeline at Channahon, Illinois, during April 26-30, 2010.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Probable Violation for two items with preliminary assessed civil penalties as noted below.

- 1. §192.709 (c) Transmission lines: record Keeping.**  
***A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is complete, which is longer.***

*§192.625 Odorization of gas.*

*§192.625 (f) Each operator shall conduct periodic sampling of combustible gases to assure the proper concentration of odorant.*

*Guardian was unable to produce annual inspection records for the inspection and testing of the domestic odorizer at the Channahon, IL compressor station for the calendar years 2007, 2008, and 2009.*

*Guardians' operating procedure, OKSop3.080.402 – "Odorization of Gas", specifies that odorizers be sampled and tested once each calendar year. A record of the inspection and testing is required per the requirements of §192.709 (c).*

*Proposed Civil Penalty \$17,600*

ONEOK Partners, L.P.  
100 West Fifth Street  
Tulsa, OK 74103  
[www.oneokpartners.com](http://www.oneokpartners.com)

**GPL NOPV Response:**

As discussed during the audit, GPL was unable to locate the 2007, 2008, and 2009, D7i records for the inspection and testing of the domestic odorizer at the GPL, Channahon Station. The odorizer was inspected and tested on May 6, 2010, and was properly working. GPL has since closed out the open work order records for the odorization inspection and maintenance tasks for 2008 and 2009. It appears no work order task was generated for 2007 since Guardian was in transition to our computerized maintenance system D7i. The open work order requests did not deal with fixes to the proper functioning of the odorization equipment so there is a reasonable basis for concluding that the equipment was in proper working order during the years inspection documentation is missing. Discussion has been held with the team members of the importance of performing the work according to the procedure and closing the work order tasks, including those dealing with inspection and documentation of same, within the required timeframe. The testing and inspection records for May 6, 2010, are attached for reference.

**2. §192.709 (c) Transmission lines: record Keeping.**

***A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is complete, which is longer.***

*§192.731 Compressor stations: Inspection and testing of relief devices.*

*§192.731 (c). Each remote control shutdown device must be inspected and tested at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly.*

*Guardian could not produce required records for the annual inspection and testing of the discharge pressure transmitter located at the Channahon IL compressor station for calendar years 2007, 2008, and 2009.*

*Guardian's operating procedure, OKSops3.030.301 – "Remote Control Shutdown Devices, Inspection, Maintenance, and Calibration", specifies annual testing and calibration of station shutdown instrumentation and devices. At the Channahon, IL compressor station the discharge pressure transmitters serve as primary shutdown device that requires a record of such testing and calibration per §192.731 (c).*

*Proposed Civil Penalty \$17,600*

**GPL NOPV Response:**

During the audit, GPL produced records for the annual inspection and testing of the discharge pressure transmitter located at the Channahon IL compressor station for calendar years 2008, and 2009. The testing and calibration record could not be found for 2007 but GPL believes that the inspection and testing was in fact completed. It appears the record was lost due to employee changes and transition to the computerized maintenance system D7i.

The fact that the testing and calibration records for 2008 and 2009 for the pressure transmitter were provided should remove these years from the penalty calculation. We ask that the fact that the 2007 records on the pressure transmitter were lost but that this is a

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Mr. David Barrett

recordkeeping rather than substantive violation result in mitigation of the proposed penalties. We ask that the recordkeeping issues associated with the odorization records at the plant be considered in light of the 2010 records showing proper operation and that this issue also be subject to mitigation of the proposed penalties.

We hope you will find the responses and information provided sufficient to warrant mitigation of the civil penalties and to assure you that we are taking responsibility for these deficiencies and steps to prevent reoccurrence. If you require any additional information or clarification to this response letter, please contact Mark Mickelberg, Senior Pipeline Safety Engineer, at 1-651-994-0332 Ext 1225.

Very truly yours,

A handwritten signature in black ink that reads "Michel E. Nelson". The signature is written in a cursive, flowing style.

Mr. Michel E. Nelson  
Senior Vice President, Natural Gas Pipeline Operations

Print Work Order Custom

Work Order	189875	80.402-TEST ODORIZATION OF GAS ANNUALLY	Scheduled Start	09/01/2008
			Scheduled End Date	09/30/2008
			Status	RELEASED
Parent WO			WO Type	DOT
Department	GUARDIAN		Assigned To	OKE10880 - WILBURN, MARK
	GUARDIAN		Reported By	
Work Schedule	80.402B		Assigned By	
Form Number:	80.402-TEST ODORIZATION OF GAS ANNUALLY		Multiple Equipment	
Standard WO			Date Started	6-29-10
Performed Every:	1 Years		Date Completed	6-29-10
Letter Interval:			Time Completed	.5

Equipment	10043	FACILITY-GPL JOLIET COMPRESSOR STATION
Manufacturer		
Model		
Serial Number		
Location		
Comment: <u>odorization pump in yard checked and operating in good condition. Mercaptain is reaching domestic sources.</u> 		
WO/PM Comments		

5.3. CONDUCT PERIODIC SAMPLING AND TESTING OF ALL ODORIZED GAS TO ASSURE THE PROPER CONCENTRATION OF ODORANT IS PRESENT.

5.3.1. SELECT SAMPLING SITES TO PROVIDE MAXIMUM ASSURANCE THAT ALL GAS WITHIN THE PIPING SYSTEM CONTAINS THE REQUIRED ODORANT CONCENTRATIONS. THE NUMBER OF SITES SELECTED DEPENDS UPON THE SIZE AND CONFIGURATION OF THE SYSTEM, LOCATION OF ODORIZATION STATIONS, AND LOCATIONS THAT MAY CONTAIN LOW ODORANT LEVELS. THE LOCATION OF SAMPLING SHOULD BE DISTANT FROM ANY GAS BEING VENTED AND THE ODORIZER.

5.3.2. SAMPLE AND TEST AT LEAST ONCE EACH CALENDAR YEAR.

5.3.3. USE AN MSA UNIVERSAL TESTER, HEATH ODORATOR OR EQUIVALENT TESTING DEVICE TO DETERMINE ODOR LEVELS. ADJUST INJECTION RATES AS NECESSARY.

5.3.4. ASSURE THAT THE GAS IS ODORIZED SO THAT IT IS READILY DETECTABLE BY A PERSON WITH A NORMAL SENSE OF SMELL AT THE FOLLOWING CONCENTRATION.

5.3.4.1. FOR ALL OTHER FACILITIES THE GAS IN AIR IS NO MORE THAN ONE-FIFTH THE LOWER EXPLOSIVE LIMIT.

5.3.5. DOCUMENT EACH TEST INCLUDING THE FOLLOWING INFORMATION.

5.3.5.1. TEST SITE LOCATION: Guardian kitchen

5.3.5.2. DATE OF TEST: 6-29-10

5.3.5.3. PERSON CONDUCTING THE TEST: Justin Maloney

5.3.5.4. UNIQUE IDENTIFICATION OF TEST INSTRUMENT: Bacharach Part # 5110-0200

5.3.5.5. RESULTS OF TEST, PERCENT GAS IN AIR: 100%

Tested on RK1 GX 2009 gas detector  
RKI is calibrated.

COMMENTS: Essential for this type of reading  
to be based on first sniff only due to  
rapid fatigue with ones olfactory senses  
with continued exposure to odor.

*J.M.*

Work Order 215575

80.402-TEST ODORIZATION OF GAS ANNUALLY

Scheduled Start 09/01/2009
Scheduled End Date 09/30/2009
Status RELEASED

Parent Work Order Department GUARDIAN GUARDIAN

WO Type DOT
Assigned To OKE11356 - FOX, JIM

Work Order Schedule 80.402B
80.402-TEST ODORIZATION OF GAS ANNUALLY

Reported By
Assigned By
Multiple Equipment

Form Number: Standard Work Order
Performed Every: 1 Years
Meter Interval:

Date Started 6-29-10
Date Completed 6-29-10
Time Completed 1.5

Equipment 10043 FACILITY-GPL JOLIET COMPRESSOR STATION

Manufacturer Model
Serial Number
Location

Comment: OdORIZATION of gas domestic has been tested and is in good operating condition.

[Handwritten Signature]

WO/PM Comments

5.3. CONDUCT PERIODIC SAMPLING AND TESTING OF ALL ODORIZED GAS TO ASSURE THE PROPER CONCENTRATION OF ODORANT IS PRESENT.

5.3.1. SELECT SAMPLING SITES TO PROVIDE MAXIMUM ASSURANCE THAT ALL GAS WITHIN THE PIPING SYSTEM CONTAINS THE REQUIRED ODORANT CONCENTRATIONS. THE NUMBER OF SITES SELECTED DEPENDS UPON THE SIZE AND CONFIGURATION OF THE SYSTEM, LOCATION OF ODORIZATION STATIONS, AND LOCATIONS THAT MAY CONTAIN LOW ODORANT LEVELS. THE LOCATION OF SAMPLING SHOULD BE DISTANT FROM ANY GAS BEING VENTED AND THE ODORIZER.

5.3.2. SAMPLE AND TEST AT LEAST ONCE EACH CALENDAR YEAR.

5.3.3. USE AN MSA UNIVERSAL TESTER, HEATH ODORATOR OR EQUIVALENT TESTING DEVICE TO DETERMINE ODOR LEVELS. ADJUST INJECTION RATES AS NECESSARY.

5.3.4. ASSURE THAT THE GAS IS ODORIZED SO THAT IT IS READILY DETECTABLE BY A PERSON WITH A NORMAL SENSE OF SMELL AT THE FOLLOWING CONCENTRATION.

5.3.4.1. FOR ALL OTHER FACILITIES THE GAS IN AIR IS NO MORE THAN ONE-FIFTH THE LOWER EXPLOSIVE LIMIT.

5.3.5. DOCUMENT EACH TEST INCLUDING THE FOLLOWING INFORMATION.

5.3.5.1. TEST SITE LOCATION: Guardian 1 Chlorination

5.3.5.2. DATE OF TEST: 6/29/2010

5.3.5.3. PERSON CONDUCTING THE TEST: Justin Whelaney

5.3.5.4. UNIQUE IDENTIFICATION OF TEST INSTRUMENT: Bacharach Part # 5110-0200

5.3.5.5. RESULTS OF TEST, PERCENT GAS IN AIR: 100% gas detected on RKI Eagle detector.



Standard concentration is barely-readily detectable

COMMENTS: As described on page 3 of

Bacharach odorometer instructions.

J. W.

Print Work Order Custom

Work Order	208910 30.301-4A,5F,G,I-TEST REMOTE SHUTDOWN DEVICES ANNUALLY	Scheduled Start	06/05/2009
		Scheduled End Date	
		Status	RELEASED
Parent WO		WO Type	DOT
Department	GUARDIAN GUARDIAN	Assigned To	OKE11356 - FOX, JIM
PM Schedule	30.301-4A,5F,G,I 30.301-4A,5F,G,I-TEST REMOTE SHUTDOWN DEVICES ANNUALLY	Requested By	
Form Number:		Assigned By	
Standard WO		Multiple Equipment	No
Performed Every:	1 Years	Date Started	7/22/09
Meter Interval:		Date Completed	7/22/09
		Time Completed	1



Equipment 59153 (GPL) STATION HIGH PRESSURE SHUTDOWN  
 Comment: OK

Manufacturer  
 Model  
 Serial Number  
 Location

**WO/PM Comments**  
 IF A TEST IS INTENDED, ISOLATE ITEMS SUCH AS DUMP VALVES, WHICH, IF OPERATED, WILL CAUSE UNNECESSARY WASTE OF GAS OR CHEMICALS OR MIGHT CAUSE AN UNWANTED SHUTDOWN OF EQUIPMENT. CLEAN, REPAIR OR REPLACE PARTS AS REQUIRED. TEST THE DEVICE BY INTRODUCING AN INPUT SIGNAL OR SIMULATED CONDITION THAT CAUSES THE DEVICE TO ACTIVATE, PRODUCING AN OUTPUT RESPONSE THAT WILL SHUTDOWN OR ISOLATE EQUIPMENT OR CAUSE OPERATION OF VALVES OR EQUIPMENT. ACTUAL EQUIPMENT SHUTDOWN OR ACTIVATION BY THE DEVICE IS NOT A REQUIREMENT.



Print Work Order Custom

Work Order	182617	30.301-4A,5F,G,I-TEST REMOTE SHUTDOWN DEVICES ANNUALLY	Scheduled Start	06/05/2008
 			Scheduled End Date	
			Status	RELEASED

Parent WO		WO Type	DOT
Department	GUARDIAN	Assigned To	OKE10880 -
	GUARDIAN		WILBURN, MARK
PM Schedule	30.301-4A,5F,G,I	Requested By	
	30.301-4A,5F,G,I-TEST REMOTE SHUTDOWN DEVICES ANNUALLY	Assigned By	
Form Number:		Multiple Equipment	No
Standard WO		Date Started	7-8-08
Performed Every:	1 Years	Date Completed	7-8-08
Meter Interval:		Time Completed	ME

Equipment 59153 STATION HIGH PRESSURE SHUTDOWN

Comment: \_\_\_\_\_

Manufacturer  
Model  
Serial Number  
Location

**WO/PM Comments**

IF A TEST IS INTENDED, ISOLATE ITEMS SUCH AS DUMP VALVES, WHICH, IF OPERATED, WILL CAUSE UNNECESSARY WASTE OF GAS OR CHEMICALS OR MIGHT CAUSE AN UNWANTED SHUTDOWN OF EQUIPMENT. CLEAN, REPAIR OR REPLACE PARTS AS REQUIRED.  
TEST THE DEVICE BY INTRODUCING AN INPUT SIGNAL OR SIMULATED CONDITION THAT CAUSES THE DEVICE TO ACTIVATE, PRODUCING AN OUTPUT RESPONSE THAT WILL SHUTDOWN OR ISOLATE EQUIPMENT OR CAUSE OPERATION OF VALVES OR EQUIPMENT. ACTUAL EQUIPMENT SHUTDOWN OR ACTIVATION BY THE DEVICE IS NOT A REQUIREMENT.