



June 25, 2009

VIA UPS NEXT DAY DELIVERY

Amelia Samaras
Pipeline and Hazardous
Materials Safety Administration
Office of the Chief Counsel
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
East Building, E26, PHC
Washington, D.C. 20590

Re: Docket No.: CPF 1-2007-1013
Brief in Lieu of In-Person Hearing

Dear Ms. Samaras:

On November 7, 2007, the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) issued a Notice of Probable Violation and Proposed Civil Penalty (the “NOPV”) to Valero Natural Gas Pipeline Company (“Valero”).¹ The NOPV arose from an inspection of Valero’s natural gas pipeline during the week of May 29, 2007, and alleged three separate violations relating to 49 C.F.R. §§ 192.465(b), 192.705 and 192.725(a) and proposed a penalty of \$14,000 for each of the three alleged violations, for a total proposed penalty of \$42,000.

Valero is not contesting the three alleged violations and Valero is not contesting the proposed penalty of \$14,000 for the alleged violation of 49 C.F.R. §192.705. Valero does, however, contest: (1) the proposed \$14,000 penalty for the alleged violation of 49 C.F.R. § 192.745; and (2) the proposed \$14,000 penalty for the alleged violation of 49 C.F.R. §192.465.

Valero recognizes that PHMSA calculates civil penalties on a case-by-case basis, applying statutory criteria to the unique circumstances of each case. See e.g., In the Matter of NuStar Logistics, L.P., Final Order, CPF No. 4-2005-5048 (Mar. 11, 2009); In the Matter of ExxonMobil Pipeline Company, Final Order, CPF No. 1-2006-5005 (Nov. 24, 2008). However, this approach does not afford PHMSA unlimited discretion in assessing civil penalties. While agencies clearly have some latitude to assess different penalties for similar violations, it is

¹ The Notice of Probable Violation issued in Docket No. CPF 1-2007-1013 was initially issued to Valero Energy Corporation, but was subsequently amended to reflect the appropriate entity, Valero Natural Gas Pipeline Company.

equally clear that in assessing penalties agencies must consider the sanctions they have imposed in the past for similar violations and imposing a penalty that varies excessively from past decisions is arbitrary and capricious unless there is a rational and well explained basis for doing so. 5 U.S.C.A. § 706(s)(A); R&W Technical Services, Ltd. v. Commodity Futures Trading Commission, 205 F.3d 165, 177 (5th Cir. 2000) (past penalties are a guide to the appropriate level of a civil monetary penalty); Monieson v. Commodities Futures Trading Commission, 966 F.2d 852, 862 (7th Cir. 1993) (in arriving at specific sanctions an agency should consider a review of sanctions imposed in the past for similar violations); Cross v. United States, 512 F.2d 1212, 1218, n.8 (5th Circuit 1975) (excessive variance in sanctions is evidence of arbitrary or capricious action).

Valero submits that the NOPV failed to properly consider the past penalties PHMSA has assessed for similar violations of 49 C.F.R. §§ 192.745(a) and 192.645(b) in other cases, and that the proposed \$14,000 penalty for each of these two alleged violations are clearly excessive in light of the agencies prior decisions, as discussed further below.

1. 49 C.F.R. §192.745(a).

With regard to the alleged violation of §192.745(a), the NOPV alleges that Valero failed to perform annual maintenance on two valves adjacent to the Paulsboro refinery that could be required during an emergency and PHMSA proposed a penalty of \$14,000 for this item. The Pipeline Safety Violation Report (PSVR), attached as Exhibit A, relating to this alleged violation noted that two valves were not tested at least once during 2006 and found that there was “no impact to an HCA” and that the alleged violation had “minimal impact on the environment.” (PSVR at 6).

In the Matter of ANR Pipeline Company, Final Order, CPF No. 2-2004-1004 (Jan. 6, 2009), PHMSA assessed a \$5,000 penalty for violations of 49 C.F.R. 192.745(a) regarding 18 separate valves. ANR exceeded the fifteen month interval requirement on all 18 valves by over 1 month and nearly missed having the annual inspections for all of the 18 valves in 2002, as the inspections were conducted just 3 days before the end of 2002. In ANR, the \$5,000 penalty amounted to a penalty of \$277.78 per valve.

In the Matter of CenterPoint Energy Gas Transmission Company, Final Order, CPF No. 4-2005-1008 (Feb. 11, 2008), the PHMSA assessed a civil penalty of \$88,500 for violations of 49 C.F.R. 192.745(a) regarding 170 separate valves. In Centerpoint, PHMSA found that the valve inspection records “indicated many valves had not been partially operated over the course of several years, even though many of the valves had been inspected.” (Final Order at 3). In CenterPoint, the \$88,500 penalty amounted to a penalty of \$520.59 per valve.

Finally, In The Matter of Trunkline Gas Company, Final Order, CPF No. 4-2004-1001 (Mar. 29, 2005), the PHMSA assessed a civil penalty of \$31,000 for violations of 49 C.F.R.

192.745(a) regarding 75 separate valves. In Trunkline, PHMSA found that Trunkline “failed to demonstrate that required inspections were conducted on certain transmission line valves.” (Final Order at 1). In Trunkline, the \$31,000 penalty amounted to a penalty of \$413.33 per valve.

Taking these cases into consideration, it would be arbitrary and capricious for PHMSA to assess the proposed \$14,000 penalty for the alleged violation of 49 C.F.R. §192.745 (a) in this case. Valero’s proposed penalty applies to only two valves and the proposed penalty amounts to a penalty of \$7,000 per valve, and the PHMSA’s decisions in ANR, CenterPoint and Trunkline demonstrate that the proposed penalty is clearly excessive. For example, the proposed \$7,000 per valve penalty is 2,417% higher than the per valve penalty assessed in ANR (\$277.78), and over 1,000% higher than the per valve fines imposed in both Centerpoint (\$520.59) and Trunkline (\$413.33). See, Monieson 996 F.3d 852 (penalties between 376% and 614% higher than penalties for past similar violations are excessive); R&W Technical, 205 F.3d at 178-9 (a penalty over 2,000% higher than past penalties for similar offenses is excessive). In addition, ANR, CenterPoint and Trunkline all involved a larger number of violations (18, 170 and 75 respectively) than the two alleged violations in this case, which suggest that the risk of harm to the environment or the public was significantly higher in each of those three cases than in Valero’s case. See R&W Technical, 205 F.3d at 177 (agency should consider the gravity and potential consequences of the alleged violation in determining amount of a penalty).²

Accordingly, Valero respectfully submits that given PHMSA’s decisions in ANR, CenterPoint and Trunkline and the facts of this case, the total proposed penalty is clearly excessive and should be reduced. To the extent a penalty is assessed for Valero’s two violations of 49 C.F.R. §192.745(a) the fine should be consistent with ANR, CenterPoint and Trunkline, which Valero submits would be no more than \$1,000, or \$500 per valve.

2. 49 C.F.R. §192.645(b).

With regard to the alleged violation of §192.745(a), the NOPV alleges that “the rectifier adjacent to the Paulsboro, NJ Refinery was read only five times during 2006,” rather than the six times required by the regulation, and that two inspection intervals exceeded the 2.5 month period required by the regulations. These missed rectifier inspection intervals all occurred over a seven month time frame from September 2006 through April of 2007. PHMSA proposed a penalty of \$14,000 for this item. The PSVR also notes that this is a shared rectifier with Buckeye Pipeline and that “Buckeye maintains the rectifier and provides the readings to

² In the Matter of Natural Gas Pipeline Company of America, Final Order, CPF No. 4-2005-1012 (Apr. 10, 2006) (“NGPC”), PHMSA assessed a \$9,500 civil penalty for violations of 49 C.F.R. 192.745(a). However, while the number of violations was not specified, the Final Order stated that NGPC failed to “partially operate several transmission line valves”. (Final Order at 1) (emphasis added). This would suggest that there were at least 3 or more violations of 49 C.F.R. 192.745(a) making the maximum penalty about \$3,167 per valve. Based on the findings in the Final Order Valero cannot ascertain what the per valve fine was in that case, but even assuming \$3,167 per valve for a fine, the proposed fine in this case would be more than double the penalty imposed in NGPC.

Valero.” (PSVR at 2). The PSVR further noted that “the pipeline is not in an HCA” and further notes that “pin-hole corrosion leakage usually has no impact on the environment.” (Id.)

In the Matter of Pacific Operators Offshore, LLC, Final Order, CPF No. 5-2004-2002 (Feb. 6, 2007), the PHMSA assessed a civil penalty of \$1,000 for a violation of 49 C.F.R. 192.465(b). In Pacific, the PHMSA alleged that Pacific failed to “inspect rectifiers within the prescribed intervals”. (Final Order at 2). The missed rectifier inspections in Pacific occurred over a period of a little more than three months.

In the Matter of Veneco, Inc., Final Order, CPF No. 5-2002-0008 (Oct. 30, 2003), the PHMSA assessed a civil penalty of \$3,000 for a violation of 49 C.F.R. 192.465(b). In Veneco, the PHMSA found that Veneco failed to “adequately inspect the ... rectifier within the prescribed maximum interval during the 1998-2001 period.” (Final Order at 2). Thus the missed rectifier inspections in Veneco occurred continuously over a 3 to 4 year period. In the Matter of Questar Pipeline Company, Final Order, CPF No. 5-2003-1010 (Mar. 4, 2004), PHMSA assessed a \$5,000 civil penalty for a violation of 49 C.F.R. 192.465(b), but the number of inspections intervals missed or the duration of the violation is not discussed in the Final Order.

Finally, In The Matter of The City of Danville, Final Order, CPF No. 1-2002-0004 (Sep. 5, 2002), the PHMSA assessed no penalty for a violation of 49 C.F.R. 192.465(b), and issued only a warning. In Danville, the City of Danville failed to “properly test the cathodic protection rectifier...between August 21, 2000 and December 4, 2000.” (Final Order at 5). These missed testing intervals occurred over a period of a little over three months.

Taking these cases into consideration, it would be arbitrary and capricious for PHMSA to assess the proposed \$14,000 penalty for the alleged violations of 49 C.F.R. §192.465(b) in this case. Valero’s proposed penalty applies to two missed rectifier inspection intervals over a seven month period, and the PHMSA’s decisions in Pacific, Veneco, Questar and City of Danville demonstrate that the proposed penalty is clearly excessive. For example, the proposed \$14,000 penalty is 1,400% higher than the \$1,000 penalty assessed in Pacific, and although Valero’s violation covers a much shorter time period than in Veneco, Valero’s penalty is three hundred sixty-six percent (366%) higher than the penalty assessed in Veneco. See, Monieson 996 F.3d 852 (penalties between 376% and 614% higher than penalties for past similar violations are excessive). The facts in Valero’s case are also much closer to the facts in Pacific and City of Danville, where a \$1,000 penalty and no penalty was imposed, respectively, as Valero’s non-compliance extended for a seven month period and the violations in Pacific and City of Danville extended for over three months. See, R&W Technical, 205 F.3d at 177.

Accordingly, Valero respectfully submits that given the precedents in Pacific, Veneco, Questar and City of Danville and the facts of this case, the total proposed penalty is clearly excessive and should be reduced. To the extent a penalty is assessed for Valero’s alleged

violations of 49 C.F.R. §192.465(b) the fine should be consistent with Pacific, Veneco and City of Danville, which Valero submits would be no more than \$2,250.

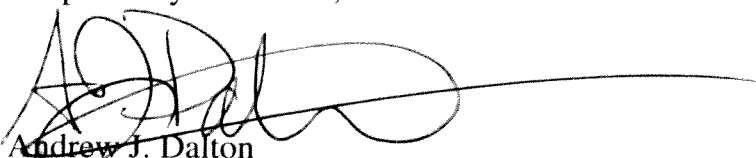
3. Conclusion

As shown above, Valero has demonstrated that: (1) the proposed \$14,000 penalty for the alleged violation of 49 C.F.R. § 192.745; and (2) the proposed \$14,000 penalty for the alleged violation of 49 C.F.R. §192.465, are both clearly excessive in light of PHMSA's past enforcement decisions and would be arbitrary and capricious if imposed on Valero. See, Monieson 996 F.3d 852; R&W Technical, 205 F.3d at 178-9. Thus, Valero submits that the proposed penalties in the NOPV should be reduced to a total of \$17,250 for the three alleged violations as follows:

	NOPV Proposed Penalty	Recommended Penalty
49 C.F.R. §192.645(a)	\$14,000	\$1,000
49 C.F.R. §192.705	\$14,000	\$14,000
49 C.F.R. §192.745(b)	\$14,000	\$2,250

Valero does not believe that a telephonic hearing with the PHMSA is necessary at this point, but Valero would be happy to further discuss these issues with PHMSA at your convenience. In addition, if you have any questions regarding this submission, or if you would like to discuss this matter further, please contact me at (210) 345-5954.

Respectfully submitted,



Andrew J. Dalton

Counsel for Valero Natural Gas Pipeline Company

Enclosures

cc: Byron E. Coy, P.E., Director PHMSA Eastern Region

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

PART A - INSPECTION IDENTIFICATION

CPF #: 120071013	<input checked="" type="checkbox"/> Gas <input type="checkbox"/> LNG <input type="checkbox"/> Hazardous Liquid	Date of Inspection: 5/29-6/1/07
PHMSA/State Inspector name and organization: Robert Smallcomb, PHMSA, ER		

PART B - OPERATOR INFORMATION

Pipeline operator/owner: Valero Natural Gas Pipeline Company	OPID: 31243	Inspection location: Philadelphia, PA, Paulsboro, NJ	Inspection Unit #: 51691
Company Official name, title, telephone, FAX#: John Pickering, VP and GM, 856 224-6360, 856 224-6616		Mailing address of Company Official: Valero Energy Corporation One Valero Way San Antonio, TX 78249-1616	
Nature and size of operator's system (total miles, HCA miles, products, environmental conditions, employees): 2.7 miles from outside Philadelphia Airport, under Delaware River to refinery on NJ side of river. Transports natural gas as fuel for refinery. There is no HCA.			
Portion of system inspected (locations and facilities): Inspected records from 2004 to present, inspected pipeline on both sides of Delaware River, reviewed OQ Form 14.			

PIPELINE SAFETY VIOLATION REPORT

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PART C - VIOLATION AND CIVIL PENALTY INFORMATION

Note: Information shown in Part C of this Pipeline Safety Violation Report relates to probable violations, proposed penalties, and proposed civil penalties.

VIOLATION NUMBER 1

Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii):

192.465(b)

How did the operator violate the regulation?:

Valero did not meet the required inspection intervals (6 times minimum per year not to exceed 2 ½ months) twice on the NJ rectifier to verify proper operation of the rectifier.

Provide additional detail regarding the violation, including the duration and extent of the violation:

The NJ rectifier was read 5 times during 2006. Inspection intervals not satisfying this section were 9/6/06 - 1/3/07 and 1/3/07-4/9/07.

Provide a description of the evidence:

Rectifier records for 2006 and 2007.

How might this violation have impacted public safety? Was this potential impact in an HCA?:

Failure to monitor rectifier operability can result in underground corrosion on pipelines going undetected due to inadequately applied cathodic protection.

How might this violation have impacted the environment? Was this potential impact in an HCA?:

The pipeline is not in an HCA. Pin-hole corrosion leakage usually has no impact on the environment.

Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]:

Jim Berger, Valero DOT Program Coordinator, James Trevino, Valero Lead Regulatory Compliance Specialist, Deryl Phillips, Project Manager for Contractor for Energy Maintenance Services (EMS), Blane Carlisle, Safety and Compliance Manager, EMS. The first two individuals represent the operator regarding safety in operations. The second two individuals represent Valero's contractor for O&M and Emergency response.

Comments of person(s) interviewed regarding the violation:

Deryl Phillips and Blane Carlisle of EMS said that Valero shares the rectifier with Buckeye Pipeline. Buckeye maintains the rectifier and provides the readings to Valero. In this case, Valero failed to verify that Buckeye properly checked and maintained the rectifier.

PIPELINE SAFETY VIOLATION REPORT

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For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the Enforcement Guidance for Liquid and Gas Transmission IM)

- Area Finding: [click here to enter](#)
- Risk Category (A-E) [click here to enter](#)

Proposed action: (check one)	<input checked="" type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>	NOPV w/ civil penalty & compliance order
	<input type="checkbox"/>	NOPV w/ compliance order	<input type="checkbox"/>	Other: [describe - click here]

Civil Penalty Assessment Considerations For This Violation:

<Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>

C1 — Degree of the operator’s culpability:

Operator is fully culpable.

C2 — Good faith in attempting to achieve compliance:

None.

C3 — Additional comments applicable to civil penalty:

Valero says for better corrosion control communications with the other pipeline company in the area, it intends to clarify corrosion control monitoring responsibly with Buckeye Pipeline.

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VIOLATION NUMBER 2

Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii):

192.705(b)

How did the operator violate the regulation?:

This section of the code requires pipelines at railroad (RR) crossings to be patrolled 4 times minimum per year at intervals not to exceed 4 ½ months. The operator failed to satisfy the code by only patrolling 2 times per year in 2005; 3 times per year in 2006 and failing to meet the 4 ½ month interval for the patrol done in 2005, in 2006 and in 2007.

Provide additional detail regarding the violation, including the duration and extent of the violation:

Pipeline is in a class 3 area. There is one RR crossing over this pipeline.

Based on the records reviewed for the inspection period, January 1, 2005 to May 2007, the following patrolling information was noted:

Valero patrolled the railroad crossing on July 14, 2005 and November 21, 2005 (2 times in 2005); January 20, 2006, April 20, 2006 and October 11, 2006 (three times in 2006). The maximum 4 ½ month interval between patrols was also exceeded in 2005, 2006 and 2007: from January 1, 2005 to July 14, 2005 (7 months, 14 day interval); April 20, 2006 to October 11, 2006 (5 month, 21 day interval); October 11, 2006 to May 1, 2007 (6 month, 20 day interval)

Provide a description of the evidence:

Patrol records for each patrol date in the above sections.

Valero's 2005 Class Location Study.

How might this violation have impacted public safety? Was this potential impact in an HCA?:

Patrolling is employed to discover unusual conditions on the pipeline, including third party excavating and missing line markers or other equipment observations. Failure to patrol could allow undiscovered nearby excavation activity and conditions to impact the pipeline's safety.

How might this violation have impacted the environment? Was this potential impact in an HCA?:

The pipeline is not in an HCA Minimal impact.

Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]:

Jim Berger, Valero DOT Program Coordinator, James Trevino, Valero Lead Regulatory Compliance Specialist, Deryl Phillips, Project Manager for Contractor for Energy Maintenance Services (EMS), Blane Carlisle, Safety and Compliance Manager, EMS. The first two individuals represent the operator regarding safety in operations. The second two individuals represent Valero's contractor for O&M and Emergency response.

Comments of person(s) interviewed regarding the violation:

Jim Berger of Valero, and Deryl Phillips and Blane of EMS stated that Valero was not aware of the patrolling frequency code requirements.

PIPELINE SAFETY VIOLATION REPORT

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<p>For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the Enforcement Guidance for Liquid and Gas Transmission IM)</p> <ul style="list-style-type: none"> • Area Finding: click here to enter • Risk Category (A-E) click here to enter 				
Proposed action: (check one)	<input checked="" type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>	NOPV w/ civil penalty & compliance order
	<input type="checkbox"/>	NOPV w/ compliance order	<input type="checkbox"/>	Other: [describe - click here]
<p>Civil Penalty Assessment Considerations For This Violation: <Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation></p>				
<p>C1 — Degree of the operator’s culpability: Fully culpable</p>				
<p>C2 — Good faith in attempting to achieve compliance: None</p>				
<p>C3 — Additional comments applicable to civil penalty: Valero’s operation and maintenance procedures do cover the patrolling frequency requirements. Operator says they will correct the problem.</p>				

PIPELINE SAFETY VIOLATION REPORT

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VIOLATION NUMBER 3				
Identify the regulation violated with the part, section, and most specific paragraph of Title 49, such as 192.309(b)(3)(ii):				
192.745				
How did the operator violate the regulation?:				
Valves 2A and 2B were not tested during 2006. These valves are designated by the Valero for use in emergencies and should have been tested at least once per calendar year not to exceed 15 months between test intervals.				
Provide additional detail regarding the violation, including the duration and extent of the violation:				
Operator is to perform maintenance annually, including turning each valve that may be essential during an emergency. Two valves (2A and 2B) were not tested during 2006.				
Provide a description of the evidence:				
Operator records for 2006 and map provided by the operator illustrating the valve locations.				
How might this violation have impacted public safety? Was this potential impact in an HCA?:				
In the event of emergency, these valves are relied upon to shut down the flow of gas. A release of gas, and possible gas ignition, would be difficult to control if an emergency valve could not be activated.				
How might this violation have impacted the environment? Was this potential impact in an HCA?:				
No impact on an HCA. Minimal impact on the environment.				
Person(s) interviewed [include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation]:				
Jim Berger, Valero DOT Program Coordinator, James Trevino, Valero Lead Regulatory Compliance Specialist, Deryl Phillips, Project Manager for Contractor for Energy Maintenance Services (EMS), Blane Carlisle, Safety and Compliance Manager, EMS. The first two individuals represent the operator regarding safety in operations. The second two individuals represent Valero's contractor for O&M and Emergency response.				
Comments of person(s) interviewed regarding the violation:				
Jim Berger of Valero offered no explanation for the valves not being tested.				
For IM Inspections only, enter the Area Finding & Risk Category data (from Table 1A or 1B of the Enforcement Guidance for Liquid and Gas Transmission IM)				
<ul style="list-style-type: none"> • Area Finding: click here to enter • Risk Category (A-E) click here to enter 				
Proposed action: (check one)	<input checked="" type="checkbox"/>	NOPV w/ civil penalty	<input type="checkbox"/>	NOPV w/ civil penalty & compliance order
	<input type="checkbox"/>	NOPV w/ compliance order	<input type="checkbox"/>	Other: [describe - click here]
Civil Penalty Assessment Considerations For This Violation:				
<Complete sections C1, C2 and C3 only if a civil penalty is proposed for this violation>				

PIPELINE SAFETY VIOLATION REPORT

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C1 — Degree of the operator's culpability:

Fully culpable.

C2 — Good faith in attempting to achieve compliance:

None

C3 — Additional comments applicable to civil penalty:

Operator plans to prevent a recurrence.

PIPELINE SAFETY VIOLATION REPORT

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PART D - History of Prior Offenses
 Note: Complete Part D only if at least one of the probable violations has a proposed civil penalty.

PRIOR OFFENSES				
(for the 5 year period prior to the approx. date of this inspection's NOPV letter)				
Date of Final Order	CPF #	What type of enforcement action(s) (CO, CP) are in the Final Order ?	Number of offenses in Final Order	Identify the regulation(s) violated (Part, Section, and specific Paragraph)
None	[click]	[click here to enter]	[click]	[click here to enter]
[click]	[click]	[click here to enter]	[click]	[click here to enter]

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Inspector's signature & organization

Date:

PHMSA Region Director's signature

Date:

Mark Werdow
 For Byron E. Coy, P.E.

11/07/07

(Rev. 3/07)

PIPELINE SAFETY VIOLATION REPORT

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Pipeline and Hazardous Materials Safety Administration



Name of Operator: Valero Natural Gas Pipeline Company

Violation number(s) supported by the evidence	Evidence (attached)	Obtained from	Identifying Witness
1	Buckeye Rectifier Record Sheet displaying years 2006 and 2007.	Operator	NA
2	Patrol/Leak Survey Sheets for 2005, 2006 and 2007	Operator	NA
2	Valero 2005 Class Location Study	Operator	NA
3	Valve Test Sheets for 2005-2007	Operator	NA
3	Drawings depicting pipeline valves	Operator	NA

Press TAB in above cell for more rows