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January 11, 2008

R.M. Seeley
Director, Southwest Region
Pipeline and Hazardous Material Safety
8701 Gessner, Suite 1110
Houston, TX 77074

Reference: Notice of Amendment, CPF 4-2007-5023M

Dear Mr. Seeley,

Targa Midstream Services Limited Partnership (“Targa”) is in receipt of the Pipeline Hazardous Materials and Safety Administration’s (“PHMSA”) December 13, 2007, Notice of Amendment resulting from an inspection of Targa’s pipeline records at Targa’s Sulfur, Louisiana location (“Notice”). As noted in your *Response Options for Pipeline Operators in Compliance Proceedings* appended to the Notice, Targa is providing certain information, explanations or other materials, such as the attached Excerpts from Targa’s Operation, Maintenance and Emergency Manual, in answer to some of the allegations in the Notice. In addition, in response to some of the PHMSA’s concerns, Targa is explaining its plan, or in some cases, the actions it has already taken, to address the inadequacies identified in the Notice.

1. 195.52 Telephonic notice of certain accidents.

Targa’s procedures for telephonic reporting did not include the requirement to telephonically report a release affecting a stream or body of water according to § 195.52(a)(4). In addition, the procedures did not include any “significant event” requirement required by § 195.52(a)(5).

These two requirements are now included in the accident reporting procedures.

Refer to pages 1 and 2 of the attached Excerpts from Targa’s Operation, Maintenance and Emergency Manual. – 3. Telephonic Notice of Certain Accidents, No. 4 and 5

2. 195.54 Accident Reports

Targa's procedures do not mention the required time frame for filing the original report. In addition, supplemental reports are not mentioned in the procedure.

Please note that Targa's procedure did include the time frame for accident reports and supplemental reports. To find such time frame, please refer to page 3 of the attached Excerpts from Targa's Operation, Maintenance and Emergency Manual – 4. Accident Report.

3. 195.56 Filing safety-related condition reports

Targa's procedures indicate that a safety-related condition report should be filed when a release occurs. Generally, a safety-related condition report would be filed to take actions to prevent an accident once a condition meeting one or more of the criteria specified in § 195.55 is discovered. Telephonic and accident reports are required once a release has occurred. While there may be an underlying chronic safety issue that resulted in a release and requires the filing of a safety-related condition report, the distinction should be clarified in the Targa procedures.

Targa's procedure stated that reports or discoveries of leaks would be investigated to determine if a safety related condition occurred, and that if a leak caused an emergency condition, a safety related condition had occurred. The procedure did not require reporting a safety related condition just because a leak had occurred. To clarify, Targa has revised this section to specify that the cause of the leak will be determined, and if the release was the result of a safety related condition, a safety related condition report is required.

Refer to page 4 of the attached Excerpts from Targa Operations, Maintenance and Emergency Manual – 6. Recognizing other Safety Related Conditions, Number 3

4. 195.222. Welders: Qualification of welders

Targa's welding procedures specify the 18th Edition of API 1104, which is not the correct edition. The procedures should be modified to reflect the 19th Edition of API 1104 and the 2001 Edition of the ASME Boiler and Pressure Vessel Code.

Targa's procedures have been modified accordingly. Refer to page 5 of the attached Excerpts from the Targa Operations, Maintenance and Emergency Manual – 4. Welder Qualifications.

5. 195.226 Welding: Arc Burns

Targa's welding procedures should specify the use of NDT (ammonium persulfate) for ensuring the complete removal of arc burns. Also, the Targa procedures do not mention any restrictions on how the ground wire is attached to the pipe.

Targa's OM&E manual did include a Procedure for Arc Burn Repair that meets the requirements. The procedure has now been referenced in the Repairs, Welding, Hot Top Section of the OM&E manual where Arc Burns are first addressed. Refer to page 6 paragraph (r) of the attached Excerpts from Targa's Operation, Maintenance and Emergency Manual and page 7 – Procedure or Arc Burn Repair.

6. 195.306 Test Medium

The Targa procedures allow the use of “other” test media when approved by the Asset Manager or Director of Engineering. The procedures should qualify this approval according to the provisions of § 195.306.

Targa’s procedures have been revised to qualify the approval. Refer to page 8 of the attached Excerpts from Targa’s Operation, Maintenance and Emergency Manual – Hydrostatic Testing Requirements – 4. Test Medium.

7. 195.310 Records

Targa’s procedures contain a contradictory statement pertaining to the retention period for pressure tests with one reference stating that only pressure tests associated with failures will be permanently retained while the records retention section states that pressure test records will be permanently retained. The procedures should be modified to be consistent with § 195.310.

Targa’s procedures have been modified to be consistent with § 195.310.

Refer to page 9 of the attached Excerpts from Targa’s Operation, Maintenance and Emergency Manual – g. Hydrostatic Testing Records, Records Retention

8. 195.402 Procedures manual for operations, maintenance, and emergencies.

Targa’s operation and maintenance manual does not include procedures for periodic review of the manual as required by § 195.402. In addition, all pages of the manual should include a revision date and all references to the prior operator should be appropriately modified.

Targa’s manual did include procedures for periodic review of the manual in the Introduction Section of the manual. The manual has been revised to include revision dates on all pages, and all references to the previous operator have been appropriately modified. Refer to page 10 of the attached Excerpts from Targa’s Operation, Maintenance and Emergency Manual – 5. Scope (d) Manual Reviews.

9. 195.438 Smoking or Open Flames

Targa’s procedures should specify that pump and breakout tank areas will have “No Smoking” signs posted.

Targa’s OM&E manual did include the requirement for prohibiting smoking and open flames at each pump station area and breakout tank area by posting signs in these areas. The procedure was located in Section VII-I Pipeline Markers, Signs, Identification, and Security. Refer to page 11 of the attached Excerpts from Targa’s Operation, Maintenance, and Emergency Manual – 4. Signs

10. 195.555 What are the qualifications for supervisors?

Targa's procedures need to clearly specify the qualifications required for the supervisor responsible for administering the corrosion control procedures.

Targa's procedures have been revised to specify the qualifications required for the supervisor responsible for administering the corrosion control procedures. Refer to page 12 of the Excerpts from Targa's Operation, Maintenance and Emergency Manual – 16. Supervisor of Corrosion Control Program.

11. 195.571 Criteria and other considerations for cathodic protection.

Targa's procedures require an interrupted survey be performed annually and the negative 850 mV "instant off" will be used as the acceptance criteria. In another paragraph, Targa's External Corrosion Control procedures specify the use of a negative 850 "on" as the acceptance criterion. The Targa procedures need to reconcile the apparent discrepancy in these statements by specifying how IR drop is to be considered in evaluating the adequacy of cathodic protection when the negative 850 mV "on" criterion is used.

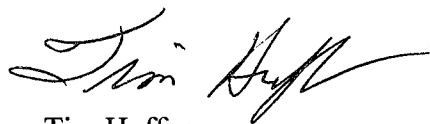
Targa's procedures have been revised to reconcile the discrepancy by stating that the only time the negative 850 mV "on" criteria is used is when the cathodic protection system is galvanic and that IR drop shall be considered. Refer to page 13 of the attached Excerpts from Targa's Operation, Maintenance and Emergency Manual - 4. External Corrosion Control (a) (1) Galvanic System

Targa appreciates the opportunity to address certain of the PHMSA's concerns and to communicate the actions it has taken to rectify some of the inadequacies noted by the PHMSA.

If you have any questions, please give me a call at (337) 583-4642 ext.200

Sincerely,

Targa Midstream Services Limited Partnership



Tim Huffer
Manager, Regulatory Compliance

Attachment: Excerpts from Targa's Operation, Maintenance and Emergency Manual
cc: Hunter Battle, Houston

SECTION V B - ACCIDENT REPORTING

Reference: Paragraphs 195.50, 195.52, 195.54, 195.58, 195.60, 195.62, 195.63, and state rules.

Also Refer to Section VIIA-M—Analyzing Pipeline Accidents to Determine The Causes. 195.402(c)(5-6)

1. Purpose

This procedure shall prescribe rules for accident reporting of any failure in a pipeline system. The Area Manager, or designee shall be responsible for gathering the data needed for reporting the accident. Corporate management will prepare and submit the reports to the Department of Transportation and a copy to state agency.

2. Scope

This section prescribes rules governing the reporting of any failure in a pipeline system subject to this part in which there is a release of the hazardous liquid transported resulting in any of the following:

- 1) Explosion or Fire not intentionally set by operator
- 2) Release of 5 Gallons or more of hazardous liquids. Note if maintenance is occurring, a release of less than 5 Barrels is not reportable if:
 - a) Not otherwise reportable
 - b) Not resulting in pollution etc. as defined in 3(a)(4) below
 - c) Confined to company property or pipeline right-of-way and
 - d) Cleaned up promptly
- 3) Death of any person.
- 4) Personal injury necessitating hospitalization
- 5) Caused estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000.

3. Telephonic Notice of Certain Accidents

- a At the earliest practicable moment following discovery of a release of the hazardous liquid transported resulting in an event described above, the Area Manager or his designee shall report by telephone in accordance with (b) and to corporate management any failure that:
 - 1) Caused a death or a personal injury requiring hospitalization;
 - 2) Resulted in either a fire or explosion not intentionally set by the operator;
 - 3) Caused estimated damage to the property of the operator or others, or both, including clean-up, recovery, value of lost product, exceeding \$50,000.
 - 4) Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of

Excerpts from Targa's Operation, Maintenance and Emergency Manual

the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines.

- 5) In the judgment of the operator was significant even though it did not meet the criteria of any other paragraph of this section.

4. Accident Reporting

An accident that is required to be reported under this subpart shall be reported as soon as practical but not later than 30 days after discovery of the accident on DOT Form 7000-1 or facsimile to the address listed below in section 7.

Whenever filing a Form 7000-1 with the Federal DOT Office, a copy must be sent to the State of Louisiana and State of Texas for accidents involving the intrastate pipelines in Louisiana and Texas.

Note: Whenever a written report is sent to the Louisiana Department of Natural Resources LA, call Dane Guidry at Pipeline Safety - Office (225) 342-5505, Home (318) 643-6433.

All corrections, changes or additions to the original report on DOT Form 7000-1 will be included on a supplemental report and sent within 30 days to the DOT, LA Office of Conservation, Texas Railroad Commission at the addresses given below.

6. Recognizing other Safety-Related Conditions

The following conditions are required to be reported for Pipeline Locations listed in Paragraph 7 if they are not repaired or replaced in five (5) working days after the day the condition is determined to exist not to exceed 10 working days after the day of initial discovery of the condition.

- a. Pipelines Operating at all Pressures
- 1) Pipelines will be inspected upon discovering environmental events such as earthquakes, landslides, or floods may have impacted the pipeline. If the event caused unintentional movement or an abnormal loading that impaired the serviceability of the pipeline, a Safety-Related Condition has occurred. The results of the inspection will be reported to the Area Manager or his designee.
 - 2) SCADA system is used to continuously monitor operating parameters. Operating personnel record malfunctions or operating errors that cause a deviation from normal operating design limits and report them to the Area Manager or his designee. Reports of pressures above normal design limits will be investigated, and if the pressure was above 110% of the MOP, a Safety Related Condition has occurred.
 - 3) Reports or discoveries of all leaks will be investigated and reported to the Area Manager or his designee. If the leak caused an emergency condition, a Safety Related condition has occurred. Emergency conditions are those which cause emergency procedures to be used. Leaks or releases can be caused by other conditions described in this section that are Safety Related Conditions. An investigation will be completed to determine the cause and determine if a Safety Related Condition occurred. Releases that that have been reported as an accident do not require reporting as a Safety Related Condition.
 - 4) Pipeline personnel will record and report events that could lead to imminent hazards to the Area Manager or his designee. If the pipeline was shutdown or the pressure reduced by 20% either directly or indirectly, a Safety Related Condition has occurred. Not applicable to pipeline abandonment.
 - 5) Report any material defect or physical damage that impairs the serviceability of a pipeline to the Area Manager or his designee.

4. Welder Qualification

a. All welders shall be qualified by destructive testing in accordance with Section 6 of the API Standard 1104 (19th ed 1999 plus Oct 31,2001 errata) or ASME Boiler & Pressure Vessel Coded Section IX (2001 ed including addenda thru 7/1/2005) using a company approved welding procedure. A welder qualified under an earlier edition than listed in 49 CFR 195.3 may weld, but may not requalify under that earlier edition. Further, the company may elect to accept a test by radiography per API 1104 as proof of welder qualification provided that the welder has been previously tested by destructive testing either API-1104 or Section IX of the Boiler & Pressure Vessel code. Re-qualification will be required when a welder has not welded with a particular welding process within the preceding 6 calendar months with one weld tested and found acceptable under Section 9 of API 1104. Additionally, each welder shall be qualified in the Company Operator Qualification Plan.

Excerpts from Targa's Operation, Maintenance and Emergency Manual

defects within the limits of API 1104 Section 6.0 requirements. Upon completion of the weld, all oxide and slag on and around the weld shall be removed to allow proper application of coatings.

m. Miter welds shall not be made.

n. No weld may be left incomplete at the end of the workday.

o. Every welder shall mark each weld he has completed. Use a non-washable crayon to identify each weld in thin wall pipe (.188 in. or less) where it is felt the strength of the pipe may be jeopardized by the indentation caused by a steel stencil.

p. A weld shall be removed if it contains a crack, if it was previously repaired and does not pass inspection, or if the pipeline inspector does not grant approval for repair. Under any of these conditions a cylinder of pipe at least 30 inches long shall be removed and a replacement cylinder shall be welded in place. The new welds shall be inspected to ensure their acceptability.

q. A repaired weld shall have the defect removed down to clean metal and the segment to be repaired shall be preheated. The preheating shall be over a distance of at least 6 inches from any point of the repair. Exercise care to prevent over-heating, and no part of the area shall be heated in excess of 400°F. After repair, the repaired segment of the weld will be inspected to ensure its acceptability.

r. Arc burns shall be repaired or removed per the Procedure for Arc Burn Repair. If a repair is made by grinding, the arc burn must be completely removed and the remaining wall thickness must be at least equal to the minimum wall thickness required by the tolerances in the specification to which the pipe was manufactured. Arc burns shall not be repaired by insert patching or by pounding out.

s. Procedures for welding or hot tapping on equipment or vessels containing flammables must be coordinated with Engineering and follow the Hot Tap procedure.

t. Welder shall preheat pipe bevels prior to welding when the ambient temperature is below 40°F.

**SECTION VIII E - PROCEDURE FOR ARC BURN REPAIR (Revises 8-1-93,
Effective 9-93)**

See: 195.226 Welding: Arc burns

- (a) Each arc burn must be repaired.
- (b) An arc burn may be repaired by completely removing the notch by grinding, if the grinding does not reduce the remaining wall thickness to less than the minimum thickness required by the tolerances in the specification to which the pipe is manufactured. If a notch is not repairable by grinding, a cylinder of the pipe containing the entire notch must be removed.
- (c) A ground may not be welded to the pipe or fitting that is being welded.

Arc Burn can be a serious defect regardless of size and should be treated as such. Arc burns may contain minor cracks hardly visible to the naked eye. These small cracks may be present in the arc burn or beneath the arc burn in the heat affected zone.

The following is a step by step procedure for examining and repairing of arc burn.

Step #1 - File down arc burn area blending it in with the contour of the pipe until visual evidence of the arc burn is completely removed.

Step #2 - Etch arc burn area with a 20 percent (by volume) solution of ammonium persulfate.

Step #3 - Visual inspection of the arc burn area should etch out to the same color. If evidence of any darkened areas are still present repeat the above (3) steps.

Step #4 - Wash arc burn with water to dilute the etchant and to remove the residue of the etchant solution from the pipe surface.

Accept/Reject Criteria

Step #5 - Check arc burn area with a thickness gauge. If the remaining wall thickness of the pipe meets the API requirements for which the pipe was manufactured, the pipe is satisfactory.

Step #6 - Arc burn shall be cut out as a cylinder if the information in step (5) is not met.

Step #7 - Keep records on the location (Sta. No.) and amount of pipe wall removed also x-ray no. of welds.

SECTION VI F - HYDROSTATIC TESTING REQUIREMENTS

Reference: Paragraphs 195.300, 195.302, 195.303, 195.304, 195.306, 195.308, 195.310

1. Objective

This section prescribes minimum requirements for hydrostatic testing of:

- a. Newly constructed steel pipelines, or
- b. Existing steel pipeline that is purchased from others, relocated, replaced, otherwise changed or for mechanical integrity.

2. General - Note (All pipelines covered by this OM&E manual have been hydrostatically tested.)

- a. Each new pipeline, or that part of a pipeline that has been relocated or replaced, must be hydrostatically tested in accordance with this subpart without leakage.
- b. The test pressure for each hydrostatic test conducted under this section must be maintained throughout the part of the system being tested for at least four continuous hours at a pressure equal to 125 percent, or more, of the maximum operating pressure and, in the case of a pipeline that is not visually inspected for leakage during test, for at least an additional four continuous hours at a pressure equal to 110 percent, or more, of the maximum operating pressure.

3. Testing of Components

- a. Each hydrostatic test must test all pipe and attached fittings, including components, unless otherwise permitted by paragraph 2. of this section.
- b. A component other than pipe that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph 1. of this section if the manufacturer certifies that either:
 - 1) The component was hydrostatically tested at the factory; or
 - 2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory.

4. Test Medium

Water must be used as the test medium unless other medium is approved by the Asset Manager or Director of Engineering. Liquid hydrocarbon that does not vaporize rapidly can be used if:

1. Not an offshore pipeline.
2. The entire section under test is outside city limits or other populated areas.
3. Each building within 300 feet (91 meters) of the test section is unoccupied while the test pressure is equal to or greater than a pressure which produces a hoop stress of 50 % of specified minimum yield strength.
4. The test section is kept under surveillance by regulator patrols during the test
5. Continuous communication is maintained along entire test section.

Excerpts from Targa's Operation, Maintenance and Emergency Manual

g. **Hydrostatic Test Records** - Testing personnel will keep complete records of test and failures occurring during the test including the exact location of failures, type and cause of failures, and the method of repair. Pipe, fittings, or valves that fail and are replaced will be marked with their pipeline station location and the pressure at which they failed. The carrier should hold such materials for disposal.

Test records will include, but not necessarily be limited to:

- 1) Pressure recording charts with appropriate information listed thereon.
- 2) Names of Operator, person responsible for test, and testing company, if any.
- 3) Date and time of test.
- 4) Test medium
- 5) Temperature data of the test medium or pipe during the test.
- 6) A completed Hydrostatic Test Report including minimum test pressure, media used, and a description of both the facility tested and the test apparatus used.
- 7) Deadweight tester log or test instrument calibration data.
- 8) Explanation of pressure discontinuities and records of failures during test and the reason for the failures.
- 9) A profile of the pipeline that shows the elevation and test sites over the entire length of the test section if elevation differences in the test section exceed 30m (approximately 100 ft.).

Records Retention: Records of the latest test must be retained as long as the facility tested is in use.

Excerpts from Targa's Operation, Maintenance and Emergency Manual

4. Quality Assurance Statement

- a. It is Targa Midstream Services Limited Partnership's intent to observe the following guiding principles in the development and implementation of its policies, procedures and practices:
- b. To operate our pipelines and facilities, and handle our raw materials, in a manner that protects the safety and health of the public, the environment and our employees. Any conditions that could adversely affect the safe operation of the pipeline will be corrected within a reasonable time.
- c. To make safety, health and environmental considerations a priority in our planning and development of new practices and processes.
- d. To participate with others in creating responsible laws, regulations and standards by which to safeguard the workplace, community and environment.
- e. To respond effectively to pipeline system related incidents and to be involved in notification, awareness, education and coordination activities with the public and governing agencies in areas where our hazardous liquid pipeline facilities are located.

5. Scope

- a. The Pipeline Operations, Maintenance and Emergencies Manual sets forth the policies and procedures governing operations, maintenance and repair of Targa Midstream Services' pipelines.
- b. The Manual is meant to provide comprehensive guidelines for pipeline operations and maintenance functions, as well as to standardize managerial and administrative procedures, so that all pipeline maintenance and repair activities are performed in a uniform manner. The manual reflects practices that comply with the Hazardous Liquid Transportation System Safety Act and 49CFR195 regulations. Additionally, the objective of the Manual is to provide those charged with responsibility for the operations, maintenance and repair of the pipelines with sufficient informational instructions to enable them to perform all operations, maintenance and repair functions in a systematic manner.
- c. **Communications** - All portions of the pipeline are within either radio or cellular phone range of the **Control Center**, the plant or pipeline office.
- d. **Manual Reviews** - Provisions for revisions and update constitute an integral part of the effectiveness of the Manual as a functional operations and maintenance tool. To the degree that users strive to improve, update, and perfect plans that direct their actions, to such degree, those plans are useful in accomplishing the tasks assigned to them. Each and every constructive criticism of this Manual, each suggestion for improvement, each request for clarification of a concept of procedure and each reporting of errors and omissions is solicited. The manual will be reviewed annually, **not to exceed 15 months**, and updated as needed.

Revision dates will be indicated on each page of the manual .

4. Signs

Signs visible to the public shall be maintained on all sides of each pumping station and breakout tank area. "NO SMOKING OR OPEN FLAMES" signs shall be posted at all pump, breakout tank, and scrapper trap areas where there is a possibility of flammable hazardous liquid or the presence of flammable vapors. Signs will provide the name of the operator and the 24 hour emergency telephone number (including area code).

16. Supervisor of Corrosion Control Program

A company employee will be designated by the Area Manager as having supervisory responsibility for the Corrosion Control Program.

- a. Qualifications required for Supervisor of Corrosion Control Program.
 1. NACE CP Level I certification
 2. Minimum of 5 years experience in operation and maintenance of DOT regulated pipelines.

- b. Responsibilities of Supervisor of Corrosion Control Program
 1. Review records of all tests and inspections associated with corrosion control required in this manual.
 2. Determination of remedial measures in consultation with certified NACE CP Level II technician or an engineer with corrosion control expertise and experience.
 3. Review and verification of documentation of all remedial or corrective actions.

Verification of Supervisor Knowledge

1. On an annual basis, the Area Manager will verify and document that the Supervisor of the Corrosion Control Program maintains a thorough knowledge of the corrosion control procedures for which he is responsible for insuring compliance.
2. Renewal of NACE certification every 3 years.

4. External Corrosion Control

All newly installed buried and submerged pipelines will be coated and cathodically protected. Each buried, in contact with the ground, and submerged pipeline system must be monitored and tested using the procedures in this Section to determine whether the cathodic protection system is meeting the proper level of protection.

a. Type of Cathodic Protection System - The pipeline system shall be cathodically protected with sacrificial anodes and/or an impressed current system consisting of rectifiers and ground beds. The ground beds shall be either deep or conventional ground beds constructed along the pipeline right-of-way. Each pipeline under cathodic protection shall have sufficient cathodic test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection. Installation should be done at cathodically protected foreign metallic structures typically (foreign line crossings), railroad crossings, major highway and major street crossings. Consideration should be given to installing test leads at other paved and unpaved road crossings and at suitable intervals on cross-country location. As a guide, the average distance between test stations or test points should be about one mile. (Appendix A & B)

- (1). Pipe to Soil electrical survey readings using copper-copper sulfate reference half cells shall be taken **once each calendar year but with intervals not exceeding 15 months.**

Impressed Current System – An Interrupted Survey will be completed. The criteria for acceptance to assess whether the cathodic protection is adequate is the negative 850 MV “instant off.” Interrupted Surveys use an interrupter on the AC or DC of an impressed current system to cycle on and off voltage potential readings from the pipeline.

Galvanic System – The criteria for acceptance is to assess whether the cathodic protection is adequate is the negative 850 MV “on.” When the potential readings are not adequate, IR drop potentials shall be considered by installation of IR drop stations.

For uncovered pipelines, soil removed so the pipe is not in contact with the soil, the negative 850 MV “on” criteria when using the Copper-copper sulfate half cell will be used to assess whether the cathodic protection is adequate.

The criteria complies with NACE RP01-69 –1996 edition. A close interval survey may be used as the annual electrical survey. (Appendix C & D)

- 2.) **Test Leads.** During electrical surveys, the condition of the Test Lead will be noted on each inspection report. Test leads will be maintained in a condition that enable electrical measurements to be taken to determine if the cathodic protection is adequate. Doubtful CP readings may indicate potential problems with the connection from the test station to the structure. The inspector will conduct continuity checks on all connections and the wire cover will be checked for damages. Damaged test leads will be scheduled for repair or replaced. (Appendix E & F)