



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

233 Peachtree Street Ste. 600  
Atlanta, GA 30303

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 26, 2007

Mr. Rich Adams  
Vice President  
Enbridge Pipelines (AlaTenn) LLC  
1100 Louisiana Street  
Suite 3300  
Houston, Texas 77002

CPF 2-2007-1003W

Dear Mr. Adams:

On 18 to 20 December 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your records in Muscle Shoals, Alabama and facilities in Alabama, Mississippi, and Tennessee.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

- 1. §192.459 External corrosion control: Examination of buried pipeline when exposed. Whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If external corrosion requiring remedial action under §§192.483 through 192.489 is found, the operator shall investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion.**

Enbridge did not have records indicating the external examination for corrosion of pipe exposed as part of work involved with a Tennessee Department of Transportation

project on US Highway 64 near Selmer, Tennessee. Subsequent to the PHMSA inspection, Enbridge documented the examination when personnel examined a piece of the removed pipe held in their yard. Enbridge also reviewed project records and interviewed project personnel. Enbridge found no evidence of corrosion on the pipe, none was documented in daily project records, and project personnel did not see any when they checked the pipe as it was removed.

2. **§192.475 Internal corrosion control: General.**

**(b) Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion.**

Enbridge did not have records indicating the internal examination for corrosion of pipe removed as part of work involved with a Tennessee Department of Transportation project on US Highway 64 near Selmer, Tennessee. Subsequent to the PHMSA inspection, Enbridge documented the inspection when personnel examined a piece of the removed pipe held in their yard. Enbridge also reviewed project records and interviewed project personnel. Enbridge found no evidence of corrosion on the pipe, none was documented in daily project records, and project personnel did not see any when they checked the pipe as it was removed.

3. **§192.625 Odorization of gas.**

**(a) A combustible gas in a distribution line must contain a natural odorant or be odorized so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell.**

**(b) After December 31, 1976, a combustible gas in a transmission line in a Class 3 or Class 4 location must comply with the requirements of paragraph (a) of this section unless:**

**(1) At least 50 percent of the length of the line downstream from that location is in a Class 1 or Class 2 location**

The last 3.93 miles of Enbridge's 10" and 12" Decatur to Huntsville pipelines are in Class 3 areas in Madison County, Alabama. The natural gas is not odorized.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violations persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Be advised that failure to do so will result in Enbridge Pipelines (AlaTenn) LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to CPF 2-2007-1003W.

Sincerely,

A handwritten signature in black ink, appearing to read "for M. Sh...". The signature is written in a cursive style with a long horizontal stroke at the end.

Linda Daugherty  
Director, Southern Region  
Pipeline and Hazardous Materials Safety Administration

