



ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS GP, LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

May 3, 2010

Linda Daugherty
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street NE, Suite 600
Atlanta, Georgia 30303

RE: CPF 2-2010-5003M
Dixie Pipeline Company (Dixie) Audit, October and November 2009
Response to Notice of Amendment, March 22, 2010

This letter is in response to the Pipeline and Hazardous Material Safety Administration (PHMSA) Final Order and resulting Compliance Notice of Amendment (NOA) dated March 22, 2010. On the basis of the inspection, PHMSA has identified procedural inadequacies within Dixie's plans and procedures.

Dixie has completed the recommended procedural amendments identified in the NOA. Changes made below to the Enterprise (Dixie) Emergency Response Plan will be official and updated no later than the next manual review and approval date. Below please see the specific changes made to the revised training procedure and emergency response plans/manual.

Please note the proposed changes are underlined and in bolded.

Item No. 1 – 49 CFR Part 195.402

Procedural manual for operations, maintenance, and emergencies.

Dixie has made modifications to the Emergency Response Plan (ERP) to address the deficiencies identified in the NOA.

6.4 (9) Attempt to identify the source, **magnitude and duration** of release or spill and material type from a safe distance.

6.4 (10) Determine the wind **direction and speed as well as the slope of the terrain.**

6.4 (14) Establish Control Zones using monitoring devices **as described in section 3.5.3.4**

3.5.3.4 Control Zones

RECEIVED MAY 05 2010

The control zones will be set by the Incident Commander (IC) and the Safety Officer (SO). In determination of control zones, the SO shall ensure a buddy system is used and maintained at all times, with appropriate back-up. **When determining control zones for releases or spills, appropriate monitoring devices and methods will be utilized as described in section 3.5.3.8.**

Personnel evaluating the site must don appropriate PPE until concentrations of contaminants and hazards have been fully evaluated. An Emergency Response Site Safety and Action Plan (EPCO form SF-49) shall be completed and communicated to personnel prior to taking any action.

- **Exclusion Zone (Hot Zone)** – The area immediately around a spill or release where contamination does or could occur. The innermost of the three zones of a hazardous substance/material incident. Special protection is required for all personnel while in this zone.
- **Contamination Reduction Zone (Warm Zone)** – The area between the Exclusion Zone and the Support Zone. This zone contains the personnel decontamination station. This zone may require a lesser degree of personnel protection than the Exclusion Zone. This separates the contaminated area from the clean area and acts as a buffer to reduce contamination of the “clean” area.
- **Support Zone (Cold Zone)** – The “clean” area outside of the contamination control line. In this area, equipment and personnel are not expected to become contaminated. Special protective clothing is not required. This is the area where resources are assembled to support the hazardous substances/materials release operations.

Every effort should be made with the resources available to restrict entry of anyone into the Controlled Zones other than emergency responders authorized by the IC. Entry into and from the Contamination Reduction Zone or Exclusion Zone shall be documented and shall occur by designated routes.

3.5.3.8 Monitoring Devices

The SO will ensure that proper monitoring devices for such gases as Oxygen, Combustible Gases, and Toxic Gases are used during the emergency response and remediation to evaluate atmospheric conditions.

1. **Monitoring devices will have current calibrations and bump test.**
2. **The user will be trained in the operation of the monitoring device.**
3. **Manufacturer recommendations for the operation of monitoring devices shall be followed.**
4. **The area to be monitored shall be approached from a safe area that is upwind or crosswind and uphill of the release or spill area and known to be free of hazardous gasses.**
5. **The terrain, wind direction and speed, product characteristics, magnitude and duration of spill or release shall be taken into consideration in determining the safe area in which to commence air monitoring.**
6. **Larger releases or spills and longer time durations will increase the hazardous area.**

- 7. Heavier than air products will follow the slope of the terrain to the lowest area, as affected by wind speed and direction. Increased wind speeds may increase the hazardous area.**

Item No. 2 – 49 CFR Part 195.403

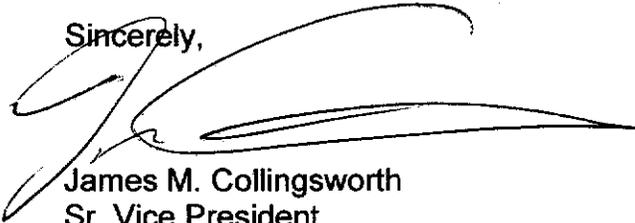
Emergency response training.

Dixie has amended its Section 908 in the Liquids O&M Manual to address the deficiency identified in the NOA. See Section 908 as an attachment to this letter.

Dixie appreciates the opportunity to work with PHMSA regarding the safe operation of our pipelines.

If you have any comments or questions, please feel free to contact Joel E. Kohler at (713) 381-4830 or by email at jkohler@eprod.com.

Sincerely,



James M. Collingsworth
Sr. Vice President
Regulated NGL Pipelines

**PROCEDURES MANUAL FOR HAZARDOUS LIQUIDS PIPELINE OPERATIONS,
MAINTENANCE, AND EMERGENCIES**

Emergency Procedures

Subject: Emergency Response Training	Section: 908
References: 49 CFR §§ 195.403	Page 1 of 2
	Date: 04/15/10

Scope:

These procedures establish requirements for a written continuing training program for emergency response personnel.

Procedure:

The Company utilizes various instruction methods when providing training for its employees that perform operations and maintenance tasks. Individual courses may be offered as web based training, on-the-job training, instructor led classroom training or other methods that are deemed appropriate to the task. Web based training courses, successfully completed by employees on a periodic schedule; serve to maintain the employees' awareness and understanding of the material in the specific topic or task. On-the-job training is performed for new employees, employees changing job responsibilities, and when job procedures or practices are changed due to changes in technology, materials, regulatory mandates, or methods. Instructor led classroom courses are utilized to provide a more in depth training experience that allows for more participation and practical based examples.

The Company Training Program is designed to provide appropriate employees with specific course material relative to their job tasks. Employees have a required list of course work (core courses) to successfully complete on a regular schedule. For Operations and Maintenance personnel, the course material addresses the characteristics of hazardous liquids and gases: i.e. flammability, toxicity, odorless vapors, auto refrigeration, asphyxia, and explosive capabilities. Course material also presents information designed to train the employee on recognition and response to emergencies, potential results of malfunctioning equipment, and the appropriate response to such an occurrence.

Operations and Maintenance personnel that may be required to react to an emergency situation are provided the appropriate level of Emergency Response training. The Company provides emergency response training utilizing internally qualified instructors and/or qualified third party emergency response training instructors/schools. Proper use of fire emergency response procedures and equipment is presented in addition to procedures and methods for controlling accidental releases, minimizing the potential for fire or explosion, and limiting personnel exposure to any toxic materials. Students also address the types and sizes of product releases or fires that could occur, fire chemistry, potential causes and what equipment should be used to mitigate a release or extinguish a fire on Company facilities. Trainees are presented with simulated conditions of actual pipeline emergencies to which they must effectively respond. Training certificates of completion are maintained by the Training Department and at designated local facility offices. Periodic Emergency Response Team meetings are conducted with designated personnel to review existing procedures, present updates, and make recommendations for changes to procedures and/or response pre-plans. A review with personnel is conducted at least once each calendar year, not to exceed 15 months, on their performance in meeting the

PROCEDURES MANUAL FOR HAZARDOUS LIQUIDS PIPELINE OPERATIONS,
MAINTENANCE, AND EMERGENCIES

Emergency Procedures

Subject: Emergency Response Training

Section: 908

References: 49 CFR §§ 195.403

Page 2 of 2

Date: 04/15/10

**Procedure
Contd.**

objectives of the emergency response training program.

Appropriate company employees and designated contractors are instructed to recognize safety related conditions that may occur in the operation of the pipeline systems, conditions that could potentially turn into a safety related condition and the corrective action that should be taken in the event of a safety related condition. Employees will report to their respective supervisors immediately in the event a safety related condition occurs. (Also see Section 202)

Periodic employee meetings are conducted with operations and maintenance personnel to discuss and train employees in the procedures and requirements of the Company's Safety Policies Manual. The Safety Policies Manual defines the responsibilities and procedures for the safe performance of maintenance and operations tasks associated with the operations of the Company operated pipelines. This includes precautions to prevent accidents, proper isolation and purging of hydrocarbons from piping and equipment, and requirements for safely repairing facilities.

Responsibilities:

Each pipeline supervisor reviews the procedures they are responsible for under the company Emergency Response Procedures section of this manual. The appropriate Pipeline Supervisors, as well as, appropriate field personnel attend annual emergency response training.

Records:

Verification of the effectiveness of the emergency response training will be documented and maintained by the Company Training and or Safety Departments.
