



NAIG Operations Engineering

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 16, 2008

Mr. R.M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 1110
Houston, TX 77074



Ref: CPF 4-2008-1018M, Notice of Amendment

Dear Mr. Seeley,

Praxair has reviewed the subject Notice of Amendment and will not contest it. However, Praxair would like to submit the following comments in response to the findings.

1. Items 1 and 2 appear to be related to the fact that our technician could not get a reading at one of the test stations the PHMSA inspector visited. We note that we had gotten a reading at the test station the last time the station was visited, during a dry run of the annual CP survey. The dry run was done to familiarize the PSI CP Technician with the locations of test stations prior to them performing the annual CP Survey. This survey was done a few weeks before the PHMSA inspection.
2. When we could not get a reading at the test station during the inspection, the Praxair technician repaired the test lead and replaced the test station while the PHMSA inspector visited other sites along the pipeline. When the PHMSA inspector returned to the test station an hour later, repairs had been completed and a satisfactory reading was taken at the test station. Particularly with respect to finding #2, section 31.5 of the O&M Manual requires that test leads be checked for proper functioning, whether there are sufficient test leads to determine the adequacy of the CP system, and that repairs or other needed remediation be documented. Section 31.8 requires that repairs (implicitly including test lead repairs) be made promptly. We were clearly prepared to (and did) make the necessary repairs promptly. We had materials as well as a trained and qualified technician on hand to replace the test station immediately.
3. The amendments required by item 3 are already covered in the Manual. Section 32.1 requires inspections for atmospheric corrosion, the point of which being to identify coating deficiencies that might allow corrosion to occur, and section 32.5 requires that



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corrosion be remediated, and that coatings be repaired even though corrosion may not be severe enough to require repair or replacement.

Our comments above notwithstanding, Praxair will amend its Operations and Maintenance Manual as shown in the enclosure.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James R. Ryan". The signature is fluid and cursive, written over a light blue horizontal line.

James R. Ryan
Pipeline Regulatory Compliance Manager

Enclosure: *Revisions to Praxair O&M Manual OM-2287*

cc: Elizabeth Casciani, V.P., Operations and Service
Mark Cook, Operations Director, South Region
William Reeves, Pipeline Manager, Gulf Coast Pipeline