



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

8701 South Gessner, Suite 1110  
Houston, TX 77074

## NOTICE OF AMENDMENT

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 17, 2008

Ms. Elizabeth Casciani,  
Vice President, Operations  
Praxair, Inc.  
39 Oil Ridgebury Rd.  
Danbury, Ct. 06810

**CPF 4-2008-1018M**

Dear Ms Casciani;

On June 16-20, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected records and procedures of your 12-inch hydrogen pipeline unit 15714 between Lake Charles, Louisiana and Deer Park, Texas.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Praxair Inc. plans or procedures, as described below:

**1. §192.465 External Corrosion Control: Monitoring.**

- d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.**

Praxair's procedure 31.5 'Cathodic Protection System Annual Inspection' in the Operations, Maintenance and Emergency Manual it states prompt remedial action shall be taken to correct any deficiencies indicated during monitoring.

Praxair must amend this procedure to identify specify actions to be taken to address issues such as faulty or deficient test leads.

**2. §192.469 External Corrosion Control: Test Stations.**

**Each pipeline under cathodic protection required by this subpart must have sufficient test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection.**

Praxair must amend procedure 31.8 'Cathodic Protection System Repair' in their Operations, Maintenance and Emergency manual to ensure proper functioning of the Cathodic Protection System and address the reporting of issues found during operation and maintenance.

**3. §192.479 Atmospheric corrosion control; General.**

**a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.**

Praxair must amend procedure 31.3 'Coating Specifications' in their Operations, Maintenance and Emergency manual to ensure the condition of above ground piping systems and address the reporting of issues that may compromise the integrity of the coating.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within [number of days] days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF 4-2008-1018M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "R. M. Seeley". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous  
Material Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*