



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

February 5, 2008

Mr. Richard Craig
Vice President, Operations
Florida Gas Transmission
5444 Westheimer Road
Houston, TX 77056

CPF 2-2008-1001W

Dear Mr. Craig:

Between September 18, 2006 and December 8, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Florida Gas Transmission (FGT) pipeline facilities in the Central and South Florida Areas, and FGT records in your Maitland, FL office.

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

§192.805 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

... (b) Ensure through evaluation that individuals performing covered tasks are qualified;

A. FGT did not follow their written qualification plan (Plan) in that an individual performing a covered task was not evaluated under the Plan.

Mr. C. Box, a FGT Senior O&M Technician, has been performing odorant intensity level inspections without being qualified under FGT's operator qualification plan. Although Mr. Box is qualified to perform odorant level inspections under FGT's Skill Qualification

program (PL005685 *J-W Odorometer*), he is not qualified to perform such an inspection under the FGT operator qualification plan. Covered Task PL004483 *Operate and Repair an Odorant System* includes verification of the odorant level in the gas system. There is no documentation indicating that Mr. Box had been qualified in this covered task.

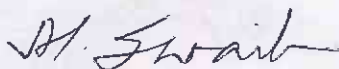
B. FGT's written qualification program is incomplete.

Covered Task PL001307 6.00 *perform a shorted-casing test, and explain steps taken* does not reference or list Operating Procedures Manual procedure 40.202 *Electrical Isolation* under the *Operating Procedures and Engineering Standards* section of the task.

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 violation 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. Failure to do so will result in Florida Gas Transmission 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 2-2008-1001W**. 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).

Sincerely,



Mohammed Shoaib
Acting Director, Southern Region
Pipeline and Hazardous Materials Safety Administration