



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

233 Peachtree Street Ste. 600
Atlanta, GA 30303

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 11, 2010

Mr. William Cope
Vice President, Eastern Operations
Tennessee Gas Pipeline
569 Brookwood Village
Room 766
Birmingham, AL 35209

CPF 2-2010-1006M

Dear Mr. Cope:

On September 22, 2009, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Tennessee Gas Pipeline (TGP) procedures for Operator Qualification (OQ) in Clay City, Kentucky.

On the basis of the inspection, PHMSA has identified an apparent inadequacy found within TGP's plans or procedures, as described below:

§192.805 Qualification program.

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

(a) Identify covered tasks;

§192.801 Scope.

(b) For the purpose of this subpart, a covered task is an activity, identified by the operator, that:

- (1) Is performed on a pipeline facility;**
- (2) Is an operations or maintenance task;**
- (3) Is performed as a requirement of this part; and**
- (4) Affects the operation or integrity of the pipeline.**

§192.171 Compressor stations: Additional safety equipment.

(b) Each compressor station prime mover, other than an electrical induction or synchronous motor, must have an automatic device to shut down the unit before the speed of either the prime mover or the driven unit exceeds a maximum safe speed.

§192.605 Procedural manual for operations, maintenance, and emergencies

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(6) Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service.

TGP has not identified a covered task, as required of 192.805(a). TGP personnel perform routine maintenance and inspection of compressor unit shutdown devices as addressed in the *Compressor Operations Policies and Procedures Manual* used by TGP. TGP personnel are qualified to perform tests of engine and compressor safety shutdown devices, including overspeed devices, per *El Paso Energy Task Qualification Standard, Task No. 051CPS, Test Safety Devices (Non RTU/PLC Systems)*. This task is not designated as a DOT Operator Qualification covered task.


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 30 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 2-2010-1006M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

for 

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

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