August 11, 2014

Ms. Gayle McLenton  
Property Manager  
Moncrief Village Apartments  
1650 Moncrief Village North  
Jacksonville, FL 32209

CPF 2-2014-0013W

Dear Ms. McLenton:

On June 18, 2014, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Southern Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, inspected the Moncrief Village Apartments master meter and downstream piping and facilities.

As a result of the inspection, it appears that Moncrief Village Apartments has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are as follows:

1. §192.481 Atmospheric corrosion control: Monitoring.  
   (a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

<table>
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<th>If the pipeline is located:</th>
<th>Then the frequency of inspection is:</th>
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<tbody>
<tr>
<td>Onshore</td>
<td>At least once every 3 calendar years, but with intervals not exceeding 39 months</td>
</tr>
<tr>
<td>Offshore</td>
<td>At least once each calendar year, but with intervals not exceeding 15 months</td>
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</table>

   ... (c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by Sec. 192.479.

Moncrief Village Apartments did not present records to demonstrate that it had inspected its onshore pipeline exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not exceeding 39 months.
2. §192.625  Odorization of gas.
   ... (f) To assure the proper concentration of odorant in accordance with this section,
   each operator must conduct periodic sampling of combustible gases using an
   instrument capable of determining the percentage of gas in air at which the odor
   becomes readily detectable. Operators of master meter systems may comply with
   this requirement by-
   (1) Receiving written verification from their gas source that the gas has the proper
   concentration of odorant; and
   (2) Conducting periodic "sniff" tests at the extremities of the system to confirm that
   the gas contains odorant.

Moncrief Village Apartments did not present records to demonstrate that it had assured
the proper concentration of odorant in its pipeline system by receiving written verification
from its gas source that the gas has the proper concentration of odorant or by conducting
periodic "sniff" tests at the extremities of the system to confirm that the gas contains
odorant.

   … (b) Mains in places or on structures where anticipated physical movement or
   external loading could cause failure or leakage must be patrolled -
   … (2) Outside business districts, at intervals not exceeding 7 1/2 months, but at least
twice each calendar year.

Moncrief Village Apartments did not present records to show it had patrolled its
distribution system in the residential area at intervals not exceeding 7½ months, but at
least twice each calendar year.

4. §192.747  Valve maintenance: Distribution systems.
   (a) Each valve, the use of which may be necessary for the safe operation of a
   distribution system, must be checked and serviced at intervals not exceeding 15
   months, but at least once each calendar year.

Moncrief Village Apartments did not present records to demonstrate that it had checked
and serviced its shut off (or key valve) which may be necessary for the safe operation of
its distribution system at intervals not exceeding 15 months, but at least once each
calendar year.

5. §192.1015  What must a master meter or small liquefied petroleum gas (LPG)
operator do to implement this subpart?
   (a) General. No later than August 2, 2011 the operator of a master meter system or
   a small LPG operator must develop and implement an IM program that includes a
   written IM plan as specified in paragraph (b) of this section. The IM program for
   these pipelines should reflect the relative simplicity of these types of pipelines.

Moncrief Village Apartments did not present records to demonstrate that it had developed
and implemented an IM program.
Under 49 United States Code, § 60122, Moncrief Village Apartments is subject to a civil penalty not to exceed $200,000 per violation per day the violation persists up to a maximum of $2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed $100,000 per violation per day, with a maximum penalty not to exceed $1,000,000 for a 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 items identified in this letter. Failure to do so will result in the Moncrief Village Apartments 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 2-2014-0013W. 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,

Wayne T. Lemoi
Director, Office of Pipeline Safety
PHMSA Southern Region