



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

October 5, 2017

Mr. Kenneth W. Grubb
Chief Operating Officer
Kinder Morgan Natural Gas Pipelines
Tennessee Gas Pipeline Company
1001 Louisiana Street, Suite 1000
Houston, Texas 77002

CPF 2-2017-1006W

Dear Mr. Grubb:

From June 19 to June 23, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety, inspected Tennessee Gas Pipeline Company (TGP) facilities in Mississippi, pursuant to Chapter 601 of 49 United States Code (U.S.C.).

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

1. **§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.

TGP failed to meet the regulation because it did not follow its procedure to document inspection and partial operation of each transmission line valve that might be required during any emergency, as required by §192.745(a).

TGP Procedure O&M 301, titled “Inspecting and Servicing Emergency Valves,” dated April 1, 2016, prescribes actions required to ensure compliance with §192.745(a). This procedure requires completion of TGP Form OM300-03, titled “Valve Inspection Service Report,” revision date April 1, 2016, to demonstrate conformance with the procedure. Form OM300-03 includes a field (field named “Operation”) to document either a “partial” or “full” valve operation. This “Operation” field was left blank on records documenting valve inspections in 2015 and 2016 for Valves 54-2ABD1 D/S BO and 54-2ABD U/S BO at TGP’s Station 54. Furthermore, 2016 inspections for the above-referenced valves were not documented using TGP Form OM300-03, as required by TGP’s procedure – the inspections were documented using an outdated form with a different format and content fields. The inspections were conducted in October 2016, after the revision dates of both the referenced TGP procedure and Form OM300-03.

TGP personnel produced work orders indicating that the inspection had been completed, but the operation of these valves was not documented in any of the work orders made available for review. TGP personnel stated that both valves were partially operated each year as a part of the valve inspection, but did not produce any supporting evidence.

2. §192.709 Transmission lines: Recordkeeping.

Each operator shall maintain the following records for transmission lines for the periods specified:

...(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

TGP documented annual valve inspections for valves that do not exist. During records review, the PHMSA Inspector noted documentation of the the following valve inspections for valves on its Line 100-1 at Station 54 in Greenville, MS:

- Valve 54-1A – Inspection Documented in 2013, 2015, and 2016
- Valve 54-1AL – Inspected Documented in 2013 and 2016

These valves do not appear on station schematics and were not observed during the field inspection of Station 54. Section 11, Step A of TGP’s Greenville Procedure, titled “Annual Valve Inspection and Maintenance,” requires Operator personnel to “Verify the District valve identification numbers and re-tag if necessary.” This procedure was last revised on August 2, 2016, approximately 3 months prior to the 2016 valve inspection.

Additionally, TGP did not consistently document the pipeline's odorization status on the leakage survey report. Records reviewed during the inspection indicated that Line 100-1 Patrol Segment 53-1+11.36 to 53-1+11.45 was odorized in 2014, as documented on TGP Form OM200-10. Records documenting the 2015 leakage survey for the same patrol segment did not indicate whether the line was odorized or unodorized. TGP stated that the line was not odorized during this period. It should be noted that this line is not required to be odorized per §192.625.

As of April 27, 2017, under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists up to a maximum of \$2,090,022 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 TGP 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 2-2017-1006W**. 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,

A handwritten signature in blue ink, appearing to read 'J. Urisko', is written over a horizontal line.

James A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region