

Enbridge Energy Company, Inc.  
26 E Superior Street, Suite 309  
Duluth, MN 55802  
www.enbridgepartners.com

Shaun G. Kavajecz, Sr. Manager  
U.S. Pipeline Compliance  
Tel 218 464 5740  
Fax 713 821 9428  
shaun.kavajecz@enbridge.com



April 9, 2013

**VIA ELECTRONIC TRANSMISSION**

Mr. David Barrett  
Director, Central Region  
Office of Pipeline Safety  
901 Locust Street, Room 462E  
Kansas City, MO 64106

Re: CPF 3-2013-5006W Enbridge Line 79 Construction Project

Dear Mr. Barrett:

Enbridge is submitting this response to the Pipeline and Hazardous Materials Safety Administration (PHMSA) Warning Letter dated February 13, 2013, in relation to the inspections conducted on Enbridge Pipelines (Toledo) Inc., Line 79 construction during the period of February 4-7, 2013.

Although your letter did not require a formal Enbridge response, Enbridge appreciates the opportunity to reply and has outlined our specific responses below to the inspection findings.

**PHMSA Finding**

**1. §195.202 Compliance with specification or standards.**

***Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.***

*PHMSA Central Region staff observed instances where the external coating inspection was not in accordance with Enbridge's construction specifications. The following issues were identified:*

- a. Foreign material, such as tape, was coated over with two part epoxy at girth weld locations.*
- b. Repairs made using two part epoxy were observed to be burned and bubbled on multiple welds.*
- c. In multiple locations, inadequate surface preparation was observed. Large gouges in the coating were observed in seven locations.*
- d. Two part epoxy repairs were observed with beads of gummy material in the repair.*
- e. Denso 7200 girth weld coatings were observed to have dry film thickness less than the required 40 mils for bore pipe. Section 8.2.13 of Enbridge's Pipeline Field Coating specification states, "When coating girth welds intended for bores or HDD service the DFT of the plural component coating applied shall be a minimum of 40 mils. This shall be completed in two separate passes or as recommended by coating manufacturer."*

*Therefore, the coating was not applied in accordance with Enbridge's construction specification.*

- f. A girth weld's coating was observed to be damaged before it fully cured at the 6:00 position due to the pipe being pulled through the rollers at the bore site.*

#### **Enbridge Response**

- a. The foreign material was removed at locations DSC-036D, DSC-024D and CML-223. The coating at these three sites was repaired per manufacturer specifications prior to the PHMSA inspection being completed on February 7, 2013. (Before and after photos available upon request.)
- b. All six identified field repair coating installations that were found to have burned or bubbled two part epoxy coatings were repaired per manufacturer specifications prior to the PHMSA inspection being completed on February 7, 2013. (Before and after photos available upon request.)
- c. The seven areas identified that were found to have gouges in the coating were repaired per manufacturer specifications prior to the PHMSA inspection being completed on February 7, 2013. (Before and after photos available upon request.)
- d. All identified field repair coating installations that were found to have beads of gummy material were evaluated. It was determined that one site needed remediation and it was repaired per manufacturer specifications prior to the PHMSA inspection being completed on February 5, 2013. (Before and after photos available upon request.)
- e. All Denso 7200 girth weld coating installations that were found to have DFT's of less than 40 mils were corrected as required by section 8.2.13 of Enbridge's Pipeline Field Coating specification. The four specific locations corrected per manufacturer specifications were DSC-036D, DSC-028D, DSC-025D, DSC-024D. These repairs were made prior to the PHMSA inspection being completed on February 7, 2013. (Before and after photos available upon request.)
- f. The girth weld coating that was damaged due to handling before it was fully cured located at DSC-021D was repaired per manufacturer specifications prior to the PHMSA inspection being completed on February 7, 2013. (Before and after photos available upon request.)

#### **Action Taken**

Enbridge is committed to take actions necessary to resolve issues identified during the field inspection that was conducted on February 4-7, 2013. Actions taken to date are as follows:

1. Enbridge requested and reviewed the training process that Precision Pipelines utilizes for the individuals involved in the coating application. A copy of this training process can be made available to PHMSA upon request.
2. All Precision Pipeline employees that are involved in the application of field applied coating were re-trained on February 7, 9, 11, 2013. The training documents are included in this response.
3. On February 18, 2013 Freddy Rojas, from Tulsa Inspection Resources was assigned as lead coating inspector. Mr. Rojas is a NACE level 3 certified coating inspector. Please see the included resume for Freddy Rojas.
4. On February 22, 2013 Enbridge retained the services of Neil Pittman, a fully qualified senior coating engineer. Mr. Pittman will be evaluating the coating process, the contractor's application and inspection process and monitoring quality control of all coating related activities on the remainder of the Line 79 construction project. Please see the included resume for Neil Pittman from Lake Superior Consulting.

**PHMSA Finding and Enbridge Response**

**2. §195.204 Inspection - General**

***Inspection must be provided to ensure the installation of the pipe or pipeline system in accordance with the requirements of this subpart. No person may be used to perform inspections unless that person has been trained and qualified in the phase of construction to be inspected.***

*Enbridge's inspection of Line 79 was not adequate to ensure the installation of pipe was in accordance with Part 195 requirements. As described in Item 1 above, Central Region staff observed instances where the external coating inspection was not in accordance with the required Enbridge construction specifications. Pipe had already been inspected by Enbridge for coating of girth welds and repairs, yet multiple girth weld coatings and repairs were still out of specification as well as foreign material being coated over as observed by PHMSA staff. At PHMSA's behest the foreign material was removed and re-inspected.*

**Enbridge Response**

Enbridge inspectors are required to participate in computer-based training (CBT) for the specific disciplines that they will inspect. The content in the CBT training is updated on a periodic basis to ensure that the trainee is exposed to fresh and current information. Some disciplines require specific certifications (i.e. coating / NACE). This training is tracked on a web-based site and monitored regularly. In order to ensure that the training is effective each inspector is required to score 100% on a written exam at the conclusion of the training. This CBT is required to be completed on a two year cycle. It is also required that inspectors attend a training session that focuses on adhering to Enbridge policies and procedures that may be specific to the project to which they are assigned.

In addition, at the conclusion of a project, the Construction Manager will complete a performance evaluation on each inspector that reported to them. The evaluation will serve as additional information to ensure that inspectors not meeting Enbridge performance requirements are not rehired for future Enbridge projects.

Should you have any questions or require further information, please contact me at (218) 464-5740.

Sincerely,



Shaun Kavajecz  
Senior Manager, U.S. Pipeline Compliance  
Enbridge Energy Company, Inc.