



February 15, 2019

Via Federal Express

Mr. Allan C. Beshore
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

RE: NOTICE OF AMENDMENT CPF 3-2019-5002M

Dear Mr. Beshore:

Kinder Morgan has reviewed and analyzed the Notice of Amendment referenced above, in which PHMSA requests certain amendments to procedures based on an inspection from August 22 – August 26, 2016 of certain procedures in Kinder Morgan Cochin, LLC (Kinder Morgan) Liquids Operations and Maintenance Manual (L-O&M) and Kinder Morgan Operation Qualification Program for Facilities Subject to DOT Parts 192 and 195 in Houston, Texas.

For the purposes of clarity, the issues presented by your office will be restated with Kinder Morgan's response immediately following in italic font. Proposed revisions to the procedures are attached to this response for your review and revisions within the procedures are highlighted in yellow. Proposed revisions will be incorporated into the L-O&M after they are determined to be adequate by PHMSA.

1. §195.307 Pressure testing aboveground breakout tanks.

(b) For aboveground breakout tanks built to API Std 620 (incorporated by reference, see §195.3) and first placed in service after October 2, 2000, hydrostatic and pneumatic testing must be performed in accordance with section 7.18 of API Std 620.

(c) For aboveground breakout tanks built to API Std 650 (incorporated by reference, see §195.3) and first placed in service after October 2, 2000, testing must be in accordance with sections 7.3.5 and 7.3.6 of API Standard 650 (incorporated by reference, see §195.3).

Kinder Morgan's procedure L_O&M 1600 is inadequate because it does not state that hydrostatic and pneumatic testing will be in accordance with Section 7.18 of API 620 as required by §195.307(b). Kinder Morgan's new tank construction testing specifications are addressed in the in L_O&M 1600. Kinder Morgan's L-O&M 1600 procedure, section 5 a ii, incorrectly references section 5.18 of API 620 Standard instead of 7.18 of API 620 Standard. The testing requirements are different for API 620 tanks and API 650 tanks built after October 2, 2000. Kinder Morgan's procedure L-O&M 1600 is also inadequate because it uses incorrect language for testing tanks built to API Standard 650. Kinder Morgan's L-O&M 1600 procedure incorrectly uses similar language regarding pneumatic and hydrotesting for both types of aboveground breakout tanks. API 650 sections 7.3.5 and 7.3.6 do not reference pneumatic testing, nor does §195.307(c).

Kinder Morgan's Response

Kinder Morgan has revised L-O&M 1600 procedure in two ways. The first revision changed the reference of section 5.18 of API 620 Standard in section 5.a.ii of L-O&M 1600 procedure to section 7.18 of API 620 Standard in regards to hydrostatic and pneumatic testing of aboveground breakout tanks subject to §195.307(b). The second revision changed the phrase "hydrostatic and pneumatic testing" from section 5.a.iii of L-O&M 1600 procedure to "testing" in order to mirror the language used in §195.307(c).

2. §195.402 Procedural manual for operations, maintenance, and emergencies.

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

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

Kinder Morgan's procedure L-O&M 2103 is inadequate because it does not state that overpressure safety devices and overfill protection systems will be installed in accordance with API 2350 Third edition. Section §195.428(c) requires that "[o]ther aboveground breakout tanks with 600 gallons (2271 liters) or more of storage capacity that are constructed or significantly altered after October 2, 2000, must have an overfill protection system installed according to API RP 2350 (incorporated by reference, see §195.3)." API RP 2350 3rd edition is incorporated by reference in 195.3(b)(12). Kinder Morgan's L-O&M 2103, Overfill Protection for Storage Tanks, incorrectly references API 2350 Fourth Edition instead of the Third Edition.

Kinder Morgan's Response

Kinder Morgan has revised L-O&M 2103 procedure to clarify that overflow protection systems for aboveground breakout tanks will be installed in accordance with the requirements of §195.428(c).

Should you have any questions or concerns regarding these procedural revisions, please call Kyle Mayberry at 713-420-4454, Quintin Frazier at 770-751-4240, Buzz Fant at 713-369-9454, or me at 713-420-6330.

Sincerely,



Wayne Simmons
Chief Operating Officer
Products Pipelines

Attachments

L-O&M 1600 procedure

L-O&M 2103 procedure

L-O&M DOT Incorporated by Reference in 49 CFR 195 document