

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 22, 2019

Otto Parets
President
UCAR Pipeline Incorporated
1000 County Rd 340
Angleton, Texas 77515

CPF 4-2019-1003M

Dear Mr. Parets:

On April 16, 2018 through April 28, 2018, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected UCAR Pipeline Incorporated's (UCAR) Texas City – Napoleonville pipeline in Texas and Louisiana.

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

1. **§192.463 External corrosion control: Cathodic protection.**
 - (a) **Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.**

UCAR's written procedure titled *OME M-15 Corrosion Control* does not provide for the determination of the adequate level of cathodic protection in accordance with Appendix D of Part 192. *OME M-15* includes the following process for determining the adequacy of cathodic protection in step 2:

The structure potential shall be at least a negative .85 volt with reference to a saturated copper-copper sulfate half-cell. This measurement is to be made with the protective current applied and the reference cell placed in the electrolyte in close proximity to the structure to minimize I x R drop error.

Appendix D of Part 192 includes the following requirement for calculating the voltage drop.

II. Interpretation of voltage measurement. Voltage (IR) drops other than those across the structure-electrolyte boundary must be considered for valid interpretation of the voltage measurement in paragraphs A (1) and (2) and paragraph B (1) of section I of this appendix.

OME M-15 does not require the measurement or calculation of the IR drop error, instead it only seeks to minimize it via measurement in close proximity to the pipe. In practice, UCAR employees measure the potential through several feet of earth which can induce significant IR drop error. UCAR must amend this procedure to require proper consideration of the IR drop error.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). 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.

It is requested (not mandated) that UCAR Pipeline Incorporated maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Mary L. McDaniel, P.E., Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2019-1003M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Compliance Proceedings.