

December 16, 2019

Mary L. McDaniel, P.E.  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
Bear 8701 S Gessner, Suite 630  
Houston, Texas 77074

RE: Golden Triangle Storage, Inc.  
Notice of Amendment CPF 4-2019-1011M

Dear Ms. McDaniel,

On November 21, 2019 Golden Triangle Storage, Inc (GTS or Company) received the referenced Notice of Amendment (NOA), CPF 4-2019-1011M, issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA). The NOA is a result of the January 7 through June 22, 2019 inspection that included GTS's procedures for external corrosion control at its storage facility in Beaumont, Texas. As a result of this inspection, PHMSA identified an apparent inadequacy found within GTS's procedures relative to 49 CFR §192.465 (d).

This inadequacy was noted by the PHMSA inspector while reviewing the Company's written Corrosion Control Monitoring procedures. The PHMSA inspector noted that the procedures "...do not stipulate a timeline or timeframe for completing remediation after it has been identified in order to maintain the pipeline integrity. §192.465(d) requires "prompt" remedial action in order to ensure that the integrity of the pipeline is not compromised in anyway and that Corrosion Control Monitoring can be completed at the required frequencies. GTS should revise its procedures to define prompt as it relates to all corrosion control remediation activities required within its procedures."

While GTS does not dispute this finding, the Company would like PHMSA to note that this inadequacy had been corrected prior to receipt of the NOA. To demonstrate this correction, GTS is providing PHMSA the following additional information in response:

1. The PHMSA Inspector reviewed the procedures in January and February of 2019.
2. The Company procedures in place at that time had a revision date of October 30, 2018.
3. Effective May 30, 2019, the Company revised Section 8.1.3 of its Corrosion Control Monitoring procedures to read, in part:

"Prompt action shall be taken to correct any deficiencies indicated by these monitoring and inspection procedures. Remediation shall be completed no later than the next required inspection."

As can be seen from the highlighted section of revised procedure 8.1.3 above, GTS has defined "prompt" relative to repair of corrosion control deficiencies to be "...completed no later than the next required inspection." This revision was based upon the guidance found in PHMSA Interpretation PI-89-006 wherein PHMSA states, in part:

"...OPS would expect that, under normal conditions, the operator should have...correction completed by the time of the next scheduled monitoring."

The Company believes that the May 30, 2019 revision to its corrosion control procedures resolves the inadequacy in accordance with 49 CFR Part 192 requirements and PHMSA's finding. This submittal should satisfy the finding and response requirements cited in your letter dated November 21, 2019. If you require more information regarding CPF 4-2019-1011M or need further clarification, please feel free to contact me.

Sincerely,



Stephen L. Wassell, PE

Vice President

Storage & peaking Operations

Enclosure: Operation Procedure Manual, Division II, Section 8, Corrosion Control Monitoring

