

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 28, 2019

Graham Bacon
Executive Vice President, Operations & Engineering
Enterprise Products Operating LLC
1100 Louisiana Street
Houston, TX 77002

CPF 4-2019-5013M

Dear Mr. Bacon:

From January 22, 2018 through August 31, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Enterprise Products Operating LLC's (Enterprise) procedures for Integrity Management in Houston, Texas.

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

1. §195.3 What documents are incorporated by reference partly or wholly in this part?

(b) American Petroleum Institute (API), 1220 L Street NW., Washington, DC 20005, and phone: 202-682-8000, Web site: <http://api.org/>.

(23) API Standard 1163, "In-Line Inspection Systems Qualification" Second edition, April 2013, (API Std 1163), IBR approved for §195.591.

(c) ASME International (ASME), Two Park Avenue, New York, NY 10016, 800-843-2763 (U.S/Canada), Web site: <http://www.asme.org/>.

(2) ASME/ANSI B31G-1991 (Reaffirmed 2004), "Manual for Determining the Remaining Strength of Corroded Pipelines," 2004, (ASME/ANSI B31G), IBR approved for §§195.452(h); 195.587; and 195.588(c).

(3) ASME/ANSI B31.4-2006, “Pipeline Transportation Systems for Liquid Hydrocarbons and Other Liquids” October 20, 2006, (ASME/ANSI B31.4), IBR approved for §§195.110(a); 195.452(h).

(g) NACE International (NACE), 1440 South Creek Drive, Houston, TX 77084, phone: 281-228-6223 or 800-797-6223, Web site: <http://www.nace.org/Publications/>.

(3) NACE SP0102-2010, “Standard Practice, Inline Inspection of Pipelines” revised March 13, 2010, (NACE SP0102), IBR approved for §195.591.

Enterprise’s written Integrity Management Procedures IM Procedure 4-01 Rev. A date 9/22/2017 and IM Procedure 4-02 Rev. A date 9/22/2017 were inadequate because they did not include the editions of the recognized industry practices and standards that are incorporated by reference in §195.3.

During the inspection Enterprise provided IM Procedure 4-01 Rev. A date 9/22/2017 (ILI DATA ANALYSIS AND REPORTING PROCEDURE) Section 4.2 Industry References and IM Procedure 4-01 Rev. A date 9/22/2017 (ILI REPORT ANALYSIS PROCEDURE FOR HCAS) Section 3.2 Industry References. Both procedures included a list of all industry references, listed below, without the editions incorporated by reference in §195.3.

API 1160 – Managing System Integrity for Hazardous Liquid Pipelines

API 1163 – In-Line Inspection Systems Qualification Standard

API 1176 – Recommended Practice for Assessment and Management of Cracking in Pipelines

ASME B31G – Manual for Determining the Remaining Strength of Corroded Pipelines

ASME B31.4 – 2006 Pipeline Transportation Systems for Liquid Hydrocarbons and Other Liquids

ASME B31.8S – Managing System Integrity of Gas Pipelines Responses To Integrity Assessments and Mitigation (Repair And Prevention) – Section 7, Figure 4.

ASNT ILI-PQ – In-line Inspection Personnel Qualification and Certification

NACE SP0102 – In-Line Inspection of Pipelines

Enterprise submitted revisions to both IM Procedure 4-01 and 4-02 on May 14, 2019, updating the procedures to include the references with the correct incorporated by reference date. No further revisions are necessary at this time.

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 Enterprise Products Operations, LLC 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 4-2019-5013M** 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*