U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

233 Peachtree Street Ste. 600
Atlanta, GA 30303

# WARNING LETTER

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 18, 2011

Mr. Kevin Bodenhamer
Senior Vice President of Liquid Pipeline Operation
Enterprise Products Operating, LLC
1100 Louisiana Street
Houston, Texas 77002

**CPF 2-2011-5005W**

Dear Mr. Bodenhamer:

Between February 28 and March 3, 2011, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected Enterprise Products Operating, LLC (Enterprise) records in Chunchula, Alabama, and your pipeline facilities located in Alabama and Mississippi, pursuant to Chapter 601 of 49 United States Code.

As a result of the inspection, it appears that Enterprise has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

1. **§195.404 Maps and records.**
**(a) Each operator shall maintain current maps and records of its pipeline systems that include at least the following information:**
**.... (2) All crossings of public roads, railroads, rivers, buried utilities, and foreign pipelines.**

Enterprise did not have current maps or records of its Chunchula Pipeline System to show all the foreign pipeline crossings.

Enterprise's records did not show the Destin Pipeline crossing at Mile Post 38 in Greene County, Mississippi, or the Tennessee Gas Pipeline crossings at Mile Post 6 in Petal, Mississippi. During the PHMSA inspection, Enterprise personnel submitted *Encroachment/Foreign Line Crossing* reports to Enterprise's Asset Integrity

Coordinator to update the maps and records for the Destin Pipeline and Tennessee Gas Pipeline crossings.

2. **§195.404 Maps and records.**
**(a) Each operator shall maintain current maps and records of its pipeline systems that include at least the following information:**
**.... (3) The maximum operating pressure of each pipeline.**

Enterprise did not have the correct records for the maximum operating pressure (MOP) of the suction side piping in the Chunchula Pump Station.

Enterprise's records indicated that the MOP of the Chunchula Pipeline System, to include the Chunchula Pump Station, was 1,440 psig. Enterprise's hydrostatic pressure test records for the pump station, and the ANSI 300 components, do not support a 1,440 psig MOP per §195.406(a) between the station upstream isolation valves and the pumps.

During the PHMSA inspection, Enterprise personnel submitted an *MOP Data Change Request* to Enterprise's Asset Integrity Department to review and reestablish the station MOP at 720 psig between the upstream isolation valves and suction side of the pumps. Notwithstanding the incorrect records, the pump station piping on the suction side of the pumps has been protected by the high discharge pressure shutdown switch at the upstream Hatters Pond Pump Station, which was set at 600 psig

3. **§195.589 What corrosion control information do I have to maintain?**
**.... (c) You must maintain a record of each analysis, check, demonstration, examination, inspection, investigation, review, survey, and test required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures does not exist. You must retain these records for at least 5 years, except that records related to §§195.569, 195.573(a) and (b), and 195.579(b)(3) and (c) must be retained for as long as the pipeline remains in service.**

Enterprise did not have records for the inspection of the internal surface of the pipe for evidence of corrosion when certain pipe sections were removed from Enterprise's Chunchula Pipeline System.

Enterprise's *Maintenance Reports* for repairs done on the pipeline on December 22, 2010, did not show that the internal pipe surface of the removed pipe was inspected for evidence of corrosion per §195.579(c). During the PHMSA inspection, Enterprise personnel inspected the internal surface of the removed pipe for evidence of corrosion and corrected the *Maintenance Reports*. The removed pipe was inspected at Enterprise's Petal Storage facility where the pipe was stored. It had no signs of corrosion. The repair work during which the pipe was removed was:

- Dig #1, ASSMT 409 at Mile Post 11.95 in Escambia County, Alabama
- Dig #2, ASSMT 406 at Mile Post 2.45 in Mobile County, Alabama

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed $100,000 for each violation for each day the violation persists up to a maximum of $1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Enterprise being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 2-2011-5005W.** 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).

Sincerely,

Wayne T. Lemoi
Director, Office of Pipeline Safety
PHMSA Southern Region