



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**

November 2, 2018

Mr. Richard Keyser  
Senior Vice President of Operations  
Gulf South Pipeline Company, L.P.  
9 Greenway Plaza, Suite 2800  
Houston, Texas 77046

**CPF 2-2018-1006W**

Dear Mr. Keyser:

From July 9 to July 12, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety, inspected Gulf South Pipeline Company (Gulf South) facilities in Louisiana, Mississippi, and Alabama, pursuant to Chapter 601 of 49 United States Code (U.S.C.). Gulf South is a subsidiary of Boardwalk Pipeline Partners (Boardwalk).

As a result of the inspection, it is alleged that Gulf South has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
  - (a) **General.** Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Gulf South failed to comply with the regulation because it did not follow its manual of written procedures for conducting operations and maintenance activities. As stated above,

Gulf South is a subsidiary of Boardwalk, and incorporates its operations and maintenance program. Specific examples are below:

- Gulf South personnel did not follow Boardwalk's procedures to document the inspection of an internal pipe surface when a portion of the pipeline was exposed during the removal of a 4-inch valve on Gulf South's Index 300-35-2 on November 28, 2016.

Boardwalk procedure, titled "8030 – Internal Corrosion Control," dated April 17, 2017, prescribes how to perform internal corrosion inspections, as required by §192.475. The referenced procedure requires the following:

"Whenever any portion of any pipeline, vessel or meter tube is removed or opened to where the internal surface can be inspected, the portion exposed is to be examined by Operations Personnel for evidence of internal corrosion and a documented visual corrosion inspection performed."

Furthermore, the procedure requires the condition of the internal pipe surface for each exposure to be documented on Boardwalk Form 8000-01, titled "Facility Inspection and Repair Report."

Section 7 of Boardwalk Form 8000-01, titled "Internal Corrosion Information", includes fields to document internal corrosion inspections. PHMSA's review of records documenting the above-referenced valve removal project revealed that "N/A" was entered for the fields "Section Completed By," "Company," and "Date" included in Section 7 of the completed Form 8000-01 associated with the project. No other fields in this section were completed. The vacant fields would capture information regarding the corrosion type, location, and depth, type of facility exposed, as well as verify that the inside of the facility was exposed.

- Gulf South personnel did not follow Boardwalk's procedures to document the inspection of the external pipe surface and coating condition when a portion Gulf South's Index 300-35 was exposed on March 16, 2016.

Boardwalk procedure, titled "8020 – External Corrosion Control," dated August 1, 2015, prescribes how to perform an examination of a buried pipeline when exposed, as required by §192.459. The referenced procedure requires the following:

"Whenever any portion of any buried pipeline has been exposed for any reason, the portion exposed is to be examined for evidence of external corrosion and, if coated, the condition of external coating. The condition of the external pipe surface and coating for each exposure shall be documented on the Pipeline Inspection Report. – Form 8000-01: Facility Inspection and Repair Report."

Section 4, titled "Existing Coating Information," and Section 6, titled "External Corrosion," of Boardwalk Form 8000-01 each include fields to document external coating condition and external corrosion information, respectively. PHMSA's review of records documenting the above-referenced project revealed that Sections 4 and 6 of the accompanying Form 8000-01 were not completed.

## **2. §192.491 Corrosion Control Records.**

**(c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§ 192.465 (a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.**

Gulf South failed to comply with the regulation because it did not maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures. Specifically, Gulf South did not maintain documentation of internal corrosion inspections stemming from 3 separate projects detailed below, as required by §192.475(b).

Boardwalk procedure, titled "8030 – Internal Corrosion Control," dated April 17, 2017, prescribes how to perform internal corrosion inspections, as required by §192.475. The referenced procedure requires the following:

"The condition of the internal pipe surface for each exposure will be documented on Form 8000-01: Facility Inspection and Repair Report."

Section 7 of Boardwalk Form 8000-01, titled "Internal Corrosion Information," includes fields to document the condition of the internal pipe surface. PHMSA's review of records documenting the projects below revealed that "N/A" was entered for the fields "Section Completed By," "Company," and "Date" included in Section 7 of the completed Form 8000-01 associated with each project. No other fields in Section 7 were completed for any of the projects. The vacant fields would capture information regarding the corrosion type, location, and depth, type of facility exposed, as well as verify that the inside of the facility was exposed.

- March 16, 2016 – Removal of 1" Riser on Gulf South Index 300-35 at Station 248+05
- March 30, 2016 – Removal of 2" Riser on Gulf South Index 300 at Station 4924+28
- October 12, 2016 – Removed valves and pipe on Gulf South Index 300-35-2 at Station 20+82

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists up to a maximum of \$2,090,022 for a 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 Gulf South 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 2-2018-1006W**. 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,

A handwritten signature in blue ink, appearing to read 'J. Urisko', with a stylized flourish at the end.

James A. Urisko  
Director, Office of Pipeline Safety  
PHMSA Southern Region