



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety Administration**

901 Locust Street, Suite 480
Kansas City, MO 64106

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: stan.horton@bwpipelines.com; tina.baker@bwpipelines.com

November 17, 2022

Stanley C. Horton
CEO Boardwalk Pipelines
Texas Gas Transmission, LLC
9 Greenway Plaza, Suite 2800
Houston, TX 77066

CPF 3-2022-064-NOA

Dear Mr. Horton:

From April 6, 2021, through November 8, 2021, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code .) inspected your natural gas pipeline facilities of your subsidiary, Gulf South Pipeline Company, LLC, in Louisiana, Mississippi, Alabama, Oklahoma, Florida and Texas.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Texas Gas Transmission, LLC's (TGT) plans or procedures, as described below:

1. **§ 192.907 What must an operator do to implement this subpart?**
 - (a) **General.** No later than December 17, 2004, an operator of a covered pipeline segment must develop and follow a written integrity management program that contains all the elements described in § 192.911 and that addresses the risks on each covered transmission pipeline segment. The initial integrity management program must consist, at a minimum, of a framework that describes the process for implementing each program element, how relevant decisions will be made and by whom, a time line for completing the work to implement the program element, and how information gained from experience will be continuously incorporated into the program. The framework will evolve into a more detailed and comprehensive program. An operator must make continual improvements to the program.

The TGT integrity management procedure titled, “*Boardwalk Pipelines Gas and Liquids Integrity Program (IMP)*” was inadequate because it did not specify how information gained from experience would be continuously incorporated into the program, or how decisions for continual improvement of the program would be implemented when performing the program effectiveness review required by § 192.945. Section 192.911(a)(i) requires an operator’s integrity management program to include a performance plan as outlined in ASME/ANSI B31.8S, section 9 that includes performance measures meeting the requirements of § 192.945. Section 192.945 governs the methods that an operator must use to test the effectiveness of its integrity management program. Specifically, the elements described under IMP Chapter 9 Performance Plan, Section 2.3, failed to define specific benchmarks or goals that would be used to verify program improvement. Additionally, IMP Chapter 12, Quality Control, Section 3.5, failed to define adequate documentation requirements. Chapter 12 placed the responsibility for effectiveness review on the “Integrity Management Supervisor”, in addition to Subject Matter Experts who submit feedback to the supervisor through meetings, however, the procedure did not define how proposals to change the program would be incorporated or how they would be prioritized. The procedure lacked detail in defining the information, schedules, and documentation methods that would be used to verify continual improvement and program effectiveness.

TGT must revise its IMP program improvement process to include detailed guidance on how decisions will be made, implemented, and tracked, including detailed documentation of the decisions by key personnel during each review. The procedure must include detailed guidance that defines how to record and measure the progress toward improvement for each program activity or element.

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 60 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 that Gulf South maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory A. Ochs Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2022-064-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings

cc: Tina Baker, Manager, Compliance Services, Boardwalk Pipelines, tina.baker@bwpipelines.com