



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 10, 2014

Mr. Robert B Raines Jr.
Senior Vice President
Cardinal Gas Storage Partners, LLC
3 Riverway, Suite 1350
Houston, TX 77056

CPF 4-2014-1013M

Dear Mr. Raines:

During the month of April through May 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Cardinal Gas Storage Partners ("Cardinal") procedures, records, and pipeline facilities in Cadeville Gas Storage, West Monroe and Perryville Gas Storage, Winnsboro, Louisiana operating areas pursuant to Chapter 601 of 49 United States Code.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Cardinal's plans or procedures, as described below:

1. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room that monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(5) Establish and implement procedures for when a different controller assumes responsibility, including the content of information to be exchanged.

Cardinal's Control Room Management Program is inadequate for the roles and responsibilities of the controller during normal, abnormal, and emergency operating conditions. Specifically, the procedures do not detail the recording of tasks and the time each task was performed by the controller. A review of the documentation does not include the time when the tasks are completed during the shift.

Cardinal must amend its procedure to ensure that the Controllers document their shift activities in the logsheet reflecting the actual time the activities took place.

2. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room that monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(5) Establish and implement procedures for when a different controller assumes responsibility, including the content of information to be exchanged.

Cardinal Control Room Management Program, Shift Turnover Procedure, Section 5 does not address the shift hand-over time between the controllers. PHMSA notes that the incoming controller should arrive a certain amount of time prior to his duty, so that a hand-over meeting will be conducted to brief incoming pipeline controllers on the status of current operations even if no unusual event occurred during the previous shift. Since the Shift Turnover Procedure did not address the hand-over time frame, Controllers turnover log sheets did not reflect the hand-over meetings that have taken place during the turn-over process.

Cardinal must amend the Control Room Shift Turnover Procedure to reflect the shift hand-over time frame so that both controllers have the enough time to cover on the current conditions and any upcoming events affecting the operation of the pipeline.

3. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room that monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section... except that for each control room where an operator's activities are limited to either or both of:

(c) *Provide adequate information.* Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays;

Cardinal Control Room Management Program is inadequate that it does not include the time frame to conduct point to point verification when field equipment is added or moved, and when other changes that affect pipeline safety are made to field equipment or SCADA displays.

According to PHMSA, point-to-point verification must be completed in a timely manner. Cardinal Control Room Management Training describes the minimum guidelines for point-to-point verification. But it does not mention the time when the verification must be completed.

Cardinal must amend its program to reflect the time frame to conduct point to point verification when field equipment is added or moved, and when other changes that affect pipeline safety are made to field equipment or SCADA displays.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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). 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 a Final Order.

If, after opportunity for a hearing, 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. § 190.237). 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 Cardinal maintains documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R M Seeley, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2014-1013M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



R M Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*