



VIA EMAIL TO [bryan.lethcoe@dot.gov]

February 23, 2023

Bryan Lethcoe
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Dear Mr. Lethcoe:

This correspondence responds to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Notice of Amendment, CPF 4-2023-004-NOA, dated January 25, 2023 (NOA), which identifies procedural changes Linde must make based on an audit of Linde's Gulf Coast Pipeline Operations (GCPO) Pipeline (the Pipeline) from March 30 to September 6, 2022. The NOA requires a written response within 30 days, which Linde has timely done by way of this correspondence.

The NOA notes that "Linde uses three different evaluation systems throughout its procedures to identify the extent of corrosion" and that "Linde must use a uniform corrosion evaluation system throughout its written procedures to ensure consistent evaluation and proper remediation." In response, Linde has developed a uniform corrosion evaluation system and taken the following actions:

1. Linde has revised SMP-188 Section 3.3 and Attachment 1 to include the new uniform corrosion evaluation system.
2. Linde has revised SMP-320 Attachment 1 Section 2.0 to include the new uniform corrosion evaluation system.
3. Linde has revised its GCPO Local Quarterly Patrol Log Inspection Form to add a reference to the new uniform corrosion evaluation system in SMP-188.

Copies of the revised documents are attached. Please note that the attachments are Linde's internally developed standards and procedures and each page is marked as business confidential, which is how these materials are maintained in the ordinary course. Linde requests that the



entirety of these materials be treated as confidential and exempt from disclosure under the Freedom of Information Act. The attachments include commercial/business information that is proprietary and confidential, the release of which could cause harm to Linde's competitive position.

Linde appreciates PHMSA's consideration of our response and considers these issues to be addressed. Please contact me at 630-320-4154 with any questions or to further discuss this matter.

Sincerely,

A handwritten signature in black ink, appearing to be "SB", written in a cursive style.

Sean Bingham
Pipeline Regulatory Specialist
Linde Inc.
Email: sean.bingham@linde.com

Enclosures

SMP-188, *Pipeline Aboveground Piping Inspection*

SMP-320, *Underground Plant Piping and Pipeline Corrosion Control Program*

GCPO local Quarterly Patrol Log Inspection Form

Cc: Todd Dunn
Shannon Hensarling
John Maitino