



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

8701 S. Gessner, Suite 630  
Houston TX 77074

## NOTICE OF AMENDMENT

### VIA ELECTRONIC MAIL

March 3, 2023

Eric Amundsen  
Senior Vice President, Operations  
Trunkline Gas Company  
1300 Main Street  
Houston, TX 77002

**CPF 4-2023-028-NOA**

Dear Mr. Amundsen:

From February 28 to August 25, 2022, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Trunkline Gas Company's (Trunkline) written procedures for controlling corrosion in Shaw, MS.

Based on the inspection, PHMSA has identified the apparent inadequacies found within Trunkline's procedures, as described below:

**1. § 192.605 Procedural manual for operations, maintenance, and emergencies.**

**(a) . . . .**

**(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**

**(1) . . . .**

**(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.**

**§ 192.481 Atmospheric corrosion control: Monitoring.**

**(a) . . . .**

**(b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.**

Trunkline's written procedures for controlling corrosion were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(2). Specifically, Trunkline's atmospheric corrosion inspection procedure, *D.44 Atmospheric Corrosion Inspection*, fails to require inspectors to give particular attention to pipe under disbonded coatings, as required by § 192.481(b). Section 7.1 of this procedure instructs inspectors to inspect and give special attention "where damaged coating is visible" but does not require inspectors to inspect underneath the damaged or disbonded coating.

Therefore, Trunkline's written procedures for controlling corrosion were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(2). Trunkline must revise its procedures to specify that inspectors must inspect under disbonded coatings in accordance with § 192.481(b).

#### 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 (not mandated) that Trunkline Gas Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Bryan Lethcoe, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2023-028-NOA**, and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

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

cc: Todd Nardozi, Director Regulatory Compliance, [todd.nardozi@energytransfer.com](mailto:todd.nardozi@energytransfer.com)