



April 25, 2023

Mr. Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave, Suite 110
Lakewood, CO 90228

RE: WARNING LETTER – CPF 5-2023-010-WL

Dear Director Hubbard:

On April 4, 2023, Central Florida Pipeline LLC (CFPL) received a Warning Letter following an inspection conducted by the Pipeline and Hazardous Materials Safety Administration (PHMSA) between March 7, 2022, through September 9, 2022. As a result of the inspection, it is alleged that CFPL committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected, and the probable violation is:

1. § 195.452 Pipeline integrity management in high consequence areas?

(a)

(h) What actions must an operator take to address integrity issues?

(1) General requirements. An operator must take prompt action to address all anomalous conditions in the pipeline that the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity, as required by this part. An operator must be able to demonstrate that the remediation of the condition will ensure that the condition is unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with all other applicable requirements in this part in remediating a condition. Each operator must, in repairing its pipeline systems, ensure that the repairs are made in a safe and timely manner and are made so as to prevent damage to persons, property, or the environment. The calculation method(s) used for anomaly evaluation must be applicable for the range of relevant threats. (i) Temporary pressure reduction. An operator must notify PHMSA, in accordance with paragraph (m) of this section, if the operator cannot meet the schedule for evaluation and remediation required under paragraph (h)(3) of this section and cannot provide safety through a temporary reduction in operating pressure. (ii) Long-term pressure reduction. When a pressure reduction exceeds 365 days, the operator must notify PHMSA in accordance with paragraph (m) of this section and explain the reasons for the delay. An operator must also take further remedial action to ensure the safety of the pipeline.

Following the discovery of integrity issues, Central Florida Pipeline Corp (CFPL) established a pressure reduction to last until repairs are completed.^{2 3} CFPL exceeded its reduced operating pressure four times from March through June of 2022. In exceeding the limits placed on the Central Florida Pipeline, CFPL failed to comply with §195.452(h)(1).

CFPL Response:

PHMSA referenced four overpressure events during the CFPL Inspection:

1. Tampa Ethanol ITE Line on 01/02/2022
2. Tampa Ethanol ITE Line on 02/10/2022

3. Hemlock Pump Station on 03/17/2022
4. Hemlock Pump Station on 06/30/2022

At this time, CFPL is not disputing the overpressure events on the Tampa Ethanol ITE Line on 01/02/2022 and 02/10/2022.

CFPL completed internal investigations of both events and took the following corrective actions as a result of the findings:

- 01/02/2022 - the restricted MOP of the ITE Line was exceeded due to controller error. The controller's applicable OQ tasks were revoked until the controller was retrained and qualified on the revoked tasks.
- 02/10/2022 - After an engineering review, the procedure was updated, reviewed by Operations, and the ITE line was safely restarted.

Pursuant to 49 CFR 195.406(b):

"No operator may permit the pressure in a pipeline during surges or other variations from normal operations to exceed 110 percent of the operating pressure limit established under paragraph (a) of this section. Each operator must provide adequate controls and protective equipment to control the pressure within this limit",

CFPL is therefore requesting the 03/17/2022 and 06/30/2022 events be removed from the warning letter since both events were within the 110% allowable due to surge pressures and other variations from normal operation, and there were no other MOP restrictions in place during these times:

- 03/17/2022 - Hemlock Pump Station suction piping (MOP: 275 psig) was over-pressured by 105% when one of the main units shut down during a switching operation.
- 6/30/2022 - Hemlock Pump Station discharge piping (MOP: 1423 psig) exceeded MOP by 109% due to the Station discharge valve being closed during a pump startup.

CFPL is committed to operating our pipeline systems safely and in compliance with all applicable regulations. Should you have any questions or concerns regarding this response, please call Jaime Hernandez at 713-369-9443 or me at 713-369-6330.

Sincerely,



Wayne G. Simmons
Chief Operating Officer
Products Pipelines

Cc: Jaime Hernandez, Director, Codes and Standards, Operations Support Group