

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 21, 2019

Kimberly S. Greene
Chairman and CEO
Southern Company Gas
10 Peachtree Place
Atlanta, Georgia 30309

CPF 4-2019-1011M

Dear Ms. Greene:

On January 7, 2019 through June 22, 2019, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected the facilities of your subsidiary, Golden Triangle Storage Inc., in Orange, Texas.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Golden Triangle Storage's plans or procedures, as described below:

- 1. §192.465 External corrosion control: Monitoring.**
 - (d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.**

Golden Triangle Storage, Inc.'s procedure for corrosion control monitoring are inadequate and require revision. Section 8.24 of the written Corrosion Control Monitoring procedures (within the Operations and Maintenance Manual and Sections 8.2.1 (a) and 8.2.1 (f) of the Division 11 Manual) do not stipulate a timeline or timeframe for completing remediation after it has been identified in order to maintain the pipeline integrity. §192.465(d) requires "prompt" remedial action in order to ensure that the integrity of the pipeline is not compromised in anyway and that Corrosion Control Monitoring can be completed at the required frequencies. Golden Triangle should revise its procedures to define prompt as it relates to all corrosion control remediation activities required within its procedures.

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 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 Golden Triangle Storage, Inc. maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Mary L. McDaniel, P.E., Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2019-1011M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

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