

December 21, 1999

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Carole P. Sims  
Senior Attorney  
Colonial Pipeline Company  
945 East Paces Ferry Road  
Atlanta, Georgia 30326

RE: CPF 28505 - Final Order dated September 17, 1999  
March 20, 1998 Pipeline Accident - Morgan Falls Landfill, Fulton County, Georgia  
Compliance Order Item No. 3.

Dear Ms. Sims:

I am in receipt of your October 18, 1999 letter conveying Colonial Pipeline Company's (Colonial) request for this office's acknowledgment and agreement that to the extent that actions taken by Colonial pursuant to the referenced Item No. 3 have already been completed, need not be repeated, and for approval of Colonial's plan and schedule for the completion of the required actions. Your letter also provides information of the work performed to date by Colonial relating to the requirements of Item No. 3.

Item No. 3 of the compliance order requires, within 30 days of the date of the final order, Colonial to review the 1998 Dacula to Greensboro Line 01 cage and deformation tool pig run data for indications of anomalies, and to ". . . submit a plan and schedule for the exposure and inspection of these to the Regional Director, Southern Region, for approval. The plan shall include exposure, inspection, and repair of the defects as follows -

- a. Expose and inspect all buckles and develop a methodology for repair or removal, providing a copy of the methodology and the basis for it to the Director, Southern Region.
- b. Expose and inspect all dents with a depth equal to or greater than 6% of the nominal diameter of the pipe, all dents on welds, all anomalies on the top half of the pipe, all multiple/overlapping dents.

- c. Repair or remove defects in accordance with Colonial's repair procedures, including the methodology developed for buckles, and the pipeline repairs section of ASMEB31.4.
- d. In addition, repair or remove all multiple/overlapping dents and all unconstrained sharp dents of depth greater than 2% of nominal pipe diameter (unless a pressure cycle analysis reveals that the unconstrained dent would not come close to failing within the useful life of the pipeline).
- e. Perform a wet magnetic particle inspection on all exposed anomalies found with any scratch, gouge, or groove indication (visual or from the pig data), all multiple/overlapping dents, all buckles, and all exposed sharp dents."

The introductory paragraph of the referenced compliance order conveys that "Respondent has already initiated some of the of the actions required under this Final Order and need not repeat any that the Regional Director, Southern Region, agrees in writing not to be repeated." I agree that the actions pursuant to Item No. 3 that were taken prior to issuance of the order, need not be repeated.

Based on the actions taken as documented in your October 18, 1999 letter (including any that were initiated prior to the issuance of the Final Order), and being in receipt of the buckle repair/removal methodology provided to this office, I agree that Colonial has satisfied, in principal, the requirements of Item 3. I approve your plan and schedule for the exposure and inspection/repair of the seven remaining indications in May, 2000.

I understand that in a previous OPS review of your buckle repair procedures last summer that there was a concern raised by the OPS inspectors about the method of measuring a buckle. I understand that this concern has been conveyed to your engineering and maintenance personnel, and that it is being addressed as required.

Sincerely,

Frederick A. Joyner  
Director, Southern Region  
Office of Pipeline Safety

cc: Compliance Registry, OPS Headquarters