

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 31, 2013

Mr. James Odum
Vice President of Operations, South Division
Trunkline LNG Co.
8100 Big Lake Road
Lake Charles, LA 70605

CPF 4-2013-3001W

Dear Mr. Odum:

On October 29-31, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code was onsite and inspected your Trunkline LNG Co.'s (Trunkline) Liquefied Natural Gas facility in Lake Charles, LA.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

1. §193.2619 Control systems.

(c) Control systems in service, but not normally in operation, such as relief valves and automatic shutdown devices, and control systems for internal shutoff valves for bottom penetration tanks must be inspected and tested once each calendar year, not exceeding 15 months, with the following exceptions:

(2) Control systems that are intended for fire protection must be inspected and tested at regular intervals not to exceed 6 months.

Trunkline's records for the inspection and testing of UV Detectors (specifically those identified under PM No. 436-52 and PM No. 799-52) reflect that the scheduled activities were not performed in accordance with the not to exceed 6 months limit of the regulations and Trunklines' own written procedure (*Maintenance Procedures Manual Section 69.0 Instrumentation*).

For PM No. 799-52, Work Order No. 11-1767 was dated November 4, 2011 and Work Order No. 12-0292 was dated May 7, 2012 indicating that the inspections were not completed within the six month time frame.

For PM No. 436-52, Work Order No. 11-1348 was dated August 23, 2011 and Work Order No. 11-2294 was dated February 24, 2012 indicating that these inspections were not completed within the required six month time frame.

Inspection and testing of UV detection equipment is critical to the safe operation of a LNG facility. UV/IR detection equipment are first line safety devices used to monitor for unintended releases of product that could eventually lead to an unintended/uncontrolled fire or explosion within an operator's facility or system.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2013-3001W**. 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).

Sincerely,

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration