

## **Enforcement Orders Signed August 25, 2015**

### **Enterprise Products Operating, LLC, Docket No. GUD 10172**

System Name: Mt. Belvieu "West" Storage Facility

System ID: 552459

Rules violated:

#### **Violation No. 1**

Requirement: 49 CFR 195.230(b)

The repaired weld(s) at the following location(s) was not inspected to ensure its acceptability.

Mt. Belvieu

#### **Violation No. 2**

Requirement: 49 CFR 195.112(b)

New pipe was not qualified for use because it did not meet the specifications and/or mechanical requirements of the written pipe specification.

#### **Violation No. 3**

Requirement: 49 CFR 195.118(a)

The butt-welded fitting(s) at the following location(s) did not meet the marking, end preparation, and/or bursting strength requirements of ANSI B16.9 or MSS Standard Practice SP-75.

#### **Violation No. 4**

Requirement: 49 CFR 195.128

The station piping installed at the listed location(s) did not meet the design requirements.

#### **Violation No. 5**

Requirement: 49 CFR 195.250

The line(s) at the following location(s) was installed with less than 12 inches of clearance from other underground structures, and proper protection was not provided.

Mt. Belvieu

**Violation No. 6**

Requirement: 49 CFR 195.112(a)

New pipe was not qualified for use because it was not made of the carbon steel that is able to withstand internal pressures and external loads.

**Penalty paid:** \$125,000

**Violation No. 7**

Requirement: 49 CFR 195.222

A welder(s) was not qualified in accordance with the appropriate standard as follows:

Note: No records of using qualified welders were made available.

- a) Each welder must be qualified in accordance with section 6 of API 1104 (incorporated by reference, see §195.3) or section IX of the ASME Boiler and Pressure Vessel Code, (incorporated by reference, see §195.3) except that a welder qualified under an earlier edition than listed in §195.3 may weld but may not re-qualify under that earlier edition.
- b) No welder may weld with a welding process unless, within the preceding 6 calendar months, the welder has:
  1. Engaged in welding with that process; and
  2. Had one welded tested and found acceptable under section 9 of API 1104 (incorporated by reference, see §195.3).

**Violation No. 8**

Requirement: 49 CFR 195.310(b)(1)

The hydrostatic test record on the listed facility (ies) did not include the pressure recording charts.

Note: No pressure testing documents were made available.

- a) A record must be made of each pressure test required by this subpart, and the record of the latest test must be retained as long as the facility tested is in use.
- b) The record required by paragraph (a) of this section must include:
  1. The pressure recording charts;
  2. Test instrument calibration data;
  3. The name of the operator, the name of the person responsible for making the test, and the name of the test company used, if any;
  4. The date and time of the test;
  5. The minimum test pressure;
  6. The test medium;
  7. A description of the facility tested and the test apparatus;
  8. An explanation of any pressure discontinuities, including test failures, that appear on the pressure recording charts;
  9. Where elevation differences in the section under test exceed 100 feet (30 meters), a profile of the pipeline that shows the elevation and test sites over the entire length of the test section; and
  10. Temperature of the test medium or pipe during the test period.

**Violation No. 9**

Requirement: 49 CFR 195.404(a)

There were no maps and records of the pipeline system.

Note: No dimensional drawings were made available depicting the exact location of pipeline valves or safety devices as required in paragraph § 195.404.

- a) Each operator shall maintain current maps and records of its pipeline systems that include at least the following information:

iv. Pipeline valves;

vii. Safety devices to which §195.428 applies.

3. The maximum operating pressure of each pipeline.

4. The diameter, grade, type, and nominal wall thickness of all pipe.

c) Each operator shall maintain the following records for the periods specified:

1. The date, location, and description of each repair made to pipe shall be maintained for the useful life of the pipe.

2. The date, location, and description of each repair made to parts of the pipeline system other than pipe shall be maintained for at least 1 year.

3. A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer.

**Violation No. 10**

Requirement: 49 CFR 195.266(b)

A complete record was not maintained on the amount, location, and/or cover of each size of pipe installed.

Note: Only drawing provided were schematic drawing with little of the follow information required. No dimensional piping drawings were made available of revision construction work.

A complete record that shows the following must be maintained by the operator involved for the life of each pipeline facility:

- a) The total number of girth welds and the number nondestructively tested, including the number rejected and the disposition of each rejected weld.
- b) The amount, location; and cover of each size of pipe installed.
- c) The location of each crossing of another pipeline.
- d) The location of each buried utility crossing.
- e) The location of each overhead crossing.
- f) The location of each valve and corrosion test station

**Violation No. 11**

Requirement: 49 CFR 195.130

The fabricated assembly(ies) installed at the listed location(s) did not meet the design requirements.

**Violation No. 12**

Requirement: 49 CFR 195.206

The pipe(s) or component(s) of the location(s) below was not visually inspected at the installation site to ensure its serviceability.

Note: No indication that any material was inspected onsite prior to installation in revision work of 2007. No pipe or other component may be installed in a pipeline system unless it has been visually inspected at the site of installation to ensure that it is not damaged in a manner that could impair its strength or reduce its serviceability.

**Violation No. 13**

Requirement: 49 CFR 195.214(b)

Detailed records were not kept of written welding procedures tests.

**Violation No. 14**

Requirement: 49 CFR 195.216

A miter joint(s) was found at the following location(s). Mt. Belvieu

**Violation No. 15**

Requirement: 49 CFR 195.234(a)

Welds were not nondestructively tested for defects that could affect each weld's integrity.

Notes: No welding nondestructive testing was made available.

- a) A weld may be nondestructively tested by any process that will clearly indicate any defects that may affect the integrity of the weld.
- b) Any nondestructive testing of welds must be performed
  1. In accordance with a written set of procedures for nondestructive testing; and
  2. With personnel that have been trained in the established procedures and in the use of the equipment employed in the testing.
- c) Procedures for the proper interpretation of each weld inspection must be established to ensure the acceptability of the weld under §195.228.
- d) During construction, at least 10 percent of the girth welds made by each welder during each welding day must be nondestructively tested over the entire circumference of the weld.
- f) When installing used pipe, 100 percent of the old girth welds must be nondestructively tested.

**Violation No. 16**

Requirement: 49 CFR 195.116(a)

The valve(s) listed below was not a sound engineering design.

Note: No records were made available indicating the valves' shells and seats were hydrostatically tested to Section 11 of API Standard 6D as required.

- e) Each valve must be both hydrostatically shell tested and hydrostatically seat tested without leakage to at least the requirements set forth in Section 11 of API Standard 6D (incorporated by reference, see §195.3).

**Violation No. 17**

Requirement: 49 CFR 195.114

Used pipe did not qualify for use because it was not made of the carbon steel that is able to withstand internal pressures and external loads

Note: Any used pipe installed in a pipeline system must comply with §195.112 (a) and (b) and the following: a) The pipe must be of a known specification and the seam joint factor must be determined in accordance with §195.106(e). If the specified minimum yield strength or the wall thickness is not known, it is determined in accordance with §195.106 (b) or (c) as appropriate.

**Violation No. 18**

Requirement: 49 CFR 195.204

The pipeline(s) at the location(s) below was not inspected by a qualified person to ensure that it was properly constructed.

Note: No records were made available to indicate that the revisions made to the incident area was adequately inspected, nor that any records were available that indicated if inspection was used, the qualifications of those doing the inspection were in accordance with § 195.204. Inspection must be provided to ensure the installation of pipe or pipeline systems in accordance with the requirements of this subpart. No person may be used to perform inspections unless that person has been trained and is qualified in the phase of construction to be inspected.

**Violation No. 19**

Requirement: 49 CFR 195.228(b)

A weld(s) on the pipe listed below was not determined acceptable according to the nondestructive testing standards in Section 6 of API 1104.

Note: No welding documentation was made available. a) Each weld and welding must be inspected to insure compliance with the requirements of this subpart. Visual inspection must be supplemented by nondestructive testing. b) The acceptability of a weld is determined according to the standards in Section 9 of API 1104.

However, if a girth weld is unacceptable under those standards for a reason other than a crack, and if Appendix A to API 1104 (incorporated by reference, see §195.3) applies to the weld, the acceptability of the weld may be determined under that appendix.

**Violation No. 20**

Requirement: 49 CFR 195.122

The pipeline system was improperly designed because the addition of any fabricated branch connections would reduce the system's strength.

Note: No records (engineering design or otherwise) were made available to indicate that the installation of any fabricated branch connections would not, or did not reduce the strength of the pipeline system piping. Each pipeline system must be designed so that the addition of any fabricated branch connections will not reduce the strength of the pipeline system

**Violation No. 21**

Requirement: 49 CFR 195.202

The pipeline system was not constructed in accordance with comprehensive written specifications or standards

**Violation No. 22**

Requirement: 49 CFR 195.505

The operator did not follow the written qualification program

**Violation No. 23**

Requirement: 49 CFR 195.507(a)(1)

The operator did not maintain a record that identifies qualified individuals.

**Violation No. 24**

Requirement: 49 CFR 195.509(a)

The operator did not have a written qualification program by April 27, 2001.