

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 29, 1998

Marathon Ashland Pipe Line LLC
Mr. Don Bozell
Vice President of Operations
539 S. Main Street
Findlay, OH 45840

CPF No. 38511M

Dear Mr. Bozell:

On October 28-30, 1997, representatives of the Central Region, Southwest Region and Western Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted a Team Inspection of Marathon Pipe Line Company's Operations & Maintenance Manuals in Findlay, Ohio. In addition, an inspection was conducted at Marathon's SCADA Control Center located in Findlay, Ohio.

As a result of a review of your operating and maintenance manual, the requirements for which are set forth in Section 195.402(a), the following inadequate procedures were noted:

1. **§195.402 Procedural manual for operations, maintenance and emergencies.**
 - A. **§195.402(a) General.** Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.
 - a. **§ 195.120(a) Passage of Internal Inspection Devices.** Marathon did not have procedures to identify that each new pipeline or each section of a pipeline in which pipe or components has been replaced must be designed to accommodate the passage of instrumented internal inspection devices.

- b. **§ 195.214(b) Welding: General.** Marathon has adopted API 1104 - 18th edition for establishment of welding procedures. Marathon's welding procedures indicated a required time for completion of the weld bead between the stringer bead and beginning of the hot pass. However, the procedures did not designate a time between the completion of the second bead and the start of other beads as required by API 1104.
- c. **§ 195.230 Weld: Repair or removal of defects.** Marathon's procedures for repair or removal of defects were unclear. In one section of the procedures, the statement was made that all cracks are cut out. However, in another section, procedures for repair of cracks was considered acceptable. In addition, the procedures did not indicate that crack lengths in excess of 8% of the weld length are unacceptable and must be removed.
- d. **§ 195.402(a).** Marathon references a number of industry accepted publications, either in part or the entire publication, that were not available during the inspection.
- e. **§ 195.404(a)(3) Maps and Records.** Marathon's General Procedures: Inspection and record keeping require that the maximum operating pressure (MOP) must be indicated for each individual line section. The MOP was not listed for some of the individual line sections that were reviewed. In addition, the definition of the MOP must distinguish between maximum operating pressure and maximum normal operating pressure.
- f. **§ 195.402(c)(2) and § 195.54(b) Accident Reports.** Marathon's procedures for Accident Reporting did not include a provision that a supplemental Form 7000-1 must be submitted if any of the parameters for reporting change.
- g. **§ 195.402(c)(12) Maintenance and Normal Operations.** Marathon did not have adequate documentation detailing the response capabilities of responders such as fire, police, and other public officials

that would respond to an emergency situation.

- h. **§ 195.402(c)(13) Maintenance and Normal Operations.** Marathon's procedures for Maintenance and Normal Operations did not include specific procedures for periodically reviewing the work done by operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action when deficiencies are found. Marathon indicated that currently the mechanism to accomplish this task is the use of the Marathon's Skill Based Training Guide.
- i. **§ 195.402(c)(14) Maintenance and Normal Operations.** Marathon's procedures for Maintenance and Normal Operations did not include specific procedures for taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation site, emergency rescue equipment, including a breathing apparatus, a rescue harness, and a rescue line. Marathon indicated that currently the mechanism used to accomplish this task is the Hazwoper Training described in Marathon's Training Guide.
- j. **§ 195.402(e)(1) Emergencies.** Marathon's procedures for receiving and identifying notices of events which need immediate response by the operator, located in Marathon's Operations Manual (Specific Line Sections), did not clearly describe the process for receiving and identifying notices of events. Marathon has agreed to add the Operations Center "Line Crossing/Emergency Notification" form to Marathon's Operations Manual.
- k. **§ 195.402(e)(7) Emergencies.** Marathon's procedures for Determination of Spill Volume and Extent did not include notifying fire, police, and other appropriate public officials of hazardous liquid emergencies and of preplanned responses regarding highly volatile liquids (HVL's).
- l. **§ 195.402(e)(8) Emergencies.** Marathon's procedures

for Determination of Spill Volume and Extent did not include determining the extent and coverage of vapor clouds and hazardous areas of highly volatile liquids (HVL's) by using appropriate instruments.

- m. **§ 195.416(a) External Corrosion Control.** Marathon's O&M procedures for Corrosion Control indicated that Marathon's Guidelines for the Determination and Disposition of Shorted Casings is to be included in Marathon's Corrosion Control Manual in order to identify and verify shorted casings and to correct or negate the effects of shorted casings. These guidelines were not located in either of the two Corrosion Manuals reviewed during the inspection.
- n. **§ 195.416(f) and § 195.416(g) External Corrosion Control.** Marathon's O&M procedures for Corrosion Control indicated that Marathon's Procedures for the Evaluation of Localized Corrosion is to be included in Marathon's Corrosion Control Manual in order to evaluate corroded pipe and isolated pitting for external corrosion. These guidelines were not located in either of the two Corrosion Manuals reviewed during the inspection. In addition, Marathon's procedures for external corrosion did not indicate if the pipe is to be replaced, repaired, or pressure reduced when corroded pipe is found and when the evaluation of that pipe indicates that pipe repair, replacement, or pressure reduction is required.
- o. **§ 195.418(d) Internal Corrosion Control.** Marathon's personnel indicated that Marathon's Procedures for the Evaluation of Localized Corrosion is to be included in Marathon's Corrosion Control Manual in order to evaluate corroded pipe for internal corrosion. These guidelines were not located in either of the two Corrosion Manuals reviewed during the inspection. In addition, Marathon's procedures for internal corrosion did not indicate if the pipe is to be replaced or pressure reduced when internally corroded pipe is found and the evaluation of that pipe indicates that pipe replacement or pressure reduction is required.
- p. **§ 195.424(b)(1) Pipe Movement.** Marathon's procedures for Pipe Movement did not indicate the precautions necessary to protect the public when movement of pipelines containing HVL's is

necessary.

- q. **§ 195.426 Scraper and Sphere Facilities.** Marathon's procedures for receiving and launching pigs indicated that verification of pressure relief in the scraper trap barrel is required before opening the scraper trap door. However, the type of mechanism to determine that pressure has been relieved was not identified in the procedures.
- r. **§ 195.430 Firefighting Equipment.** Marathon's procedures for firefighting equipment did not indicate the type of equipment that would be accessible around or near breakout tank areas.
- s. **§ 195.442(b)(2) and § 195.442(b)(6) Damage Prevention Program.** At the time of the inspection, Marathon did not have available adequate procedures to describe Marathon's Damage Prevention Program.

As provided in 49 C.F.R. §190.237, this Notice of Amendment serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. § 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this Notice. If you do not wish to contest this Notice of Amendment, you may provide your revised procedures within 30 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. § 190.237.

Thank you again for your cooperation. If you have any questions in regard to this matter, please contact me at 816-426-2654.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety