

**NOTICE OF AMENDMENT**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

September 9, 2014

Mr. Geoffrey Craft  
Vice President, Operations  
ExxonMobil Pipeline Co.  
800 Bell Street  
Houston, TX 77252

**CPF 4-2014-5021M**

Dear Mr. Craft:

On May 5 – 8, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected ExxonMobil Pipeline Company (EMPCo) procedures and records for their Control Management Program in Pasadena, TX.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within EMPCo's plans or procedures, as described below:

**1. § 195.446 Control room management.**

**(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**

**(4) A method of recording controller shift-changes and any hand-over of responsibility between controllers.**

EMPCo's Control Room Management Plan procedure, "Small Breaks," section 3.10.2, page 25 for the Pasadena facility does not have adequate control measures in place for providing prompt and appropriate response for those situations when the Pasadena Station Operator (PSO), the controller, leaves the console unattended for an extended period of time.

The procedure, "Small Breaks", section 3.10.2 states,

*"If the PSO (controller) must leave before a scheduled task is complete and he/she may not be back to the console before the scheduled event occurs, the PSO must notify the Pasadena Station Supervisor on duty and another qualified PSO of the upcoming event".*

PHMSA reviewed the procedure and through discussions with the operator ascertained that there will be numerous instances when the PSO will be required to leave the console unattended for extended periods of time to perform other duties in the station yard. The station is manned 24 hours/7 days a week with the PSO being the only Pasadena Station personnel on duty during late night shifts.

EMPCo must revise its procedures to include provisions that would facilitate prompt and appropriate controller response to operating conditions during periods when the PSO will not be at the console for an extended period of time, and to document any hand-over of responsibility between controllers.

## **2. § 195.446 Control room management.**

**(e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:**

**(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations...**

EMPCo's Pasadena facility Control Room Management Plan procedure, "Pasadena Station Operator (PSO) Activity Monitoring" section 6.7, pages 63 & 64 references Section 6.3.2 as the location in the plan where you can find alarm priority for Safety Related Alarms. Section 6.3.2 includes an Alarm Table for the Pasadena Station, but there is no data in the table.

EMPCo needs to revise its procedures to remove the reference to Section 6.3.2 or input actual Safety-Related Alarm data into the table.

## **3. § 195.446 Control room management.**

**(h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator.**

EMPCo's control room training review process references document F-195.446(h) which no longer exist to record controller training content as a means to identify potential improvements to the training program.

PHMSA reviewed the procedure and found that the document used for recording the control room training review no longer exist, and should be removed as referenced in the procedure.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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). 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 a Final Order.

If, after opportunity for a hearing, 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. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 45 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 ExxonMobil Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2014-5021M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

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