

**ExxonMobil Pipeline Company**

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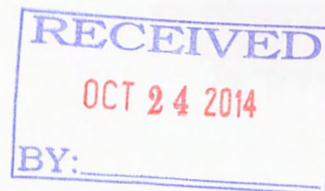
**Jim B. Rose**

Safety, Health And Environment Department  
Manager



October 17, 2014

Mr. Rodrick M. Seeley  
Director, PHMSA Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner Road, Suite 1110  
Houston, TX 77074



Re: CPF 4-2014-5021M  
Notice of Amendment – PHMSA Control Room Management Inspection - Pasadena

Dear Mr. Seeley:

During the week of May 5, 2014 PHMSA representatives inspected ExxonMobil Pipeline Company's ("EMPCo") procedures for Control Room Management (CRM) in Pasadena, Texas. The inspection resulted in a NOA, CPF 5-2014-5021M, being issued to EMPCo on September 9, 2014. Based upon the circumstances and supporting documentation, PHMSA did not propose a civil penalty associated with this matter. PHMSA sent the NOA to Mr. Geoffrey Craft, who no longer works for EMPCo and is no longer the EMPCo Vice President. EMPCo ultimately received the NOA from Mr. Craft on September 17, 2014. Going forward, please send all correspondence on this matter to:

Ms. Karen Tyrone  
EMPCo Vice President and Operations Manager  
800 Bell Street, Room 691H  
Houston, Texas 77002

ExxonMobil Pipeline Company strives to maintain compliance with all regulations, and any allegations of noncompliant or inadequate procedures are taken very seriously. Please let this letter serve as EMPCo's response to PHMSA's concerns as noted in the September 9, 2014 letter. In submitting this response, EMPCo neither admits nor denies the factual and legal allegations contained in the NOA.

For ease of reference, we have included the language (and retained the numbering) from PHMSA's September 9, 2014 letter, which appears in italicized text below. EMPCo's response immediately follows each item in normal font.

**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.**

Cited Violation:

*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.*

EMPCo Response:

EMPCo proposes to amend its procedures to limit the PSO's time away from the console to 30 minutes at a time. If approved EMPCo will change the "Small Breaks" procedure to the following:

**3.10.2 Small Breaks, (Time Away from the Console)**

It is EMPCo's expectation that the on-duty PSO is responsible for everything that occurs during his/her scheduled shift. If the PSO must leave his/her console for a short period of time it is expected that the PSO will have completed all tasks scheduled during the time he/she expects to be away from the console.

Some of the job duties of the PSO require him/her to leave the console for short periods of time to perform other duties associated with operation and maintenance of the tank farm. During these brief periods the PSO is required to take the station phone, except when entering areas where the phone could be considered a safety hazard.

In no instance should the PSO be away from the console for more than 30 minutes.

If the PSO must leave before a scheduled task is complete and he/she may not be back to the console before the scheduled event occurs, or if the PSO will be away from the console for more than 30 minutes, the PSO

must notify the Pasadena Station Supervisor and arrangements made to have another qualified PSO available to monitor the upcoming event.

## 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...**

### Cited Violation:

*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.*

### EMPCo Response:

As noted in the Pasadena CRM a list of all alarms, safety related and non safety related, are located on a shared drive that is accessible to the PSO. EMPCo will remove the table and references to the table from the CRM.

## 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.

### Cited Violation:

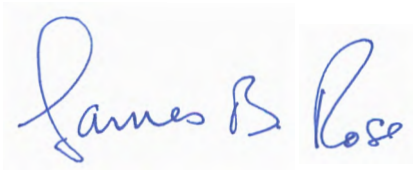
*EMPCo's control room training review process references document F-195.446(h) which no longer exist to record controller training content as a means to identify potential improvements to the training program .*

*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.*

### EMPCo Response:

The reference to form F-195.446(h) has been removed from the EMPCo Pasadena CRM and replaced with the appropriate meeting sign-in sheet.

Sincerely,

A handwritten signature in blue ink that reads "James B. Rose". The signature is written in a cursive style with a large initial "J" and "R".

Jim B. Rose  
Manager, Safety Health and Environment