



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 22, 2014

Mr. Todd Denton
President
Phillips 66 Pipeline, LLC
3010 Briarpark Drive
Houston, TX 77042

CPF 4-2014-5024M

Dear Mr. Denton:

On multiple dates between the months of February and April, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the portions of Phillips 66 Pipeline LLC (Phillips) pipeline system located in Texas and Louisiana.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within the Phillips 66 Pipeline plans or procedures, as described below:

1. §195.208 Welding of supports and braces.

Supports or braces may not be welded directly to pipe that will be operated at a pressure of more than 100 p.s.i. (689 kPa) gage.

Phillips' welding procedures do not prohibit welding of supports or braces directly to pipe that will be operated at a pressure of more than 100 p.s.i. (689 kPa) gage.

On July 16, 2012, PHMSA issued a Final Order with a Compliance Order (CPF 4-2012-5005) to Phillips for welding braces directly to the suction and discharge piping at the Clifton Ridge Marine Terminal main pumps. As a result of this Compliance Order, Phillips surveyed their operating facilities for similar equipment and brought their facilities into compliance with 49 CFR 195. By doing so, Phillips had completed the actions in Compliance Order. However, Phillips did not revise the procedure.

To avoid similar occurrence in the future, Phillips must amend their procedures to include prohibition of supports or braces to be welded directly to pipe that will be operated at a pressure of more than 100 p.s.i.

2. §195.216 Welding: Miter joints.

A miter joint is not permitted (not including deflections up to 3° that are caused by misalignment).

Phillips' welding procedures does not prohibit miter joints (not including deflections up to 3° that are caused by misalignment) in their welding procedure MPR 4401 – Welding Procedures and Welder Qualification.

Phillips must amend the welding procedures to include prohibition of a miter joint.

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 Phillips 66 Pipeline, LLC 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 4-2014-5024M** and, for each document you submit, please provide a copy in electronic format whenever possible.

In regard to Items 1 and 2 listed above, Phillips 66 Pipeline LLC updated procedure and submitted via email to PHMSA on May 9, 2014. This procedure submittal was reviewed and deemed adequate. No further action is required in response to this Notice and this case is now closed. Thank you for your cooperation.

Sincerely,



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

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