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Colonial Pipeline Company

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March 17, 2010

Mr. Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 306
West Trenton, NJ 08628

Subject: Notice of Probable Violation and Proposed Civil Penalty
CPF No. 1-2010-5001
Notice of Amendment
CPF No. 1-2010-5002M
Written Response and Request for Hearing

Dear Mr. Coy:

This letter is in response to PHSMA's Notice of Probable Violation and Proposed Civil Penalty CPF No. 1-2010-5001 (the "NOPV") and Notice of Amendment CPF No. 1-2010-5002M (the "NOA"), both dated February 16, 2010, and received by Colonial on February 17, 2010, relating to an investigation at our Hill Delivery Facility and the Allied Terminals, Inc. facility in Chesapeake, VA. The investigation was conducted in response to an incident (NRC #815028) that occurred at the Allied Terminals, Inc. facility on October 17, 2006, that resulted in the overflow of Allied Tank #9. The NOPV and the NOA provide that Colonial has 30 days from receipt of the Notice to submit written explanations, information, or other materials in response to the allegations and/or seek elimination or mitigation of the proposed civil penalty, and/or to request a hearing. Accordingly, this written response and Request for Hearing are timely.

As further explained below, we believe that the NOPV and NOA were issued to Colonial on the basis of a factual and legal misunderstanding concerning the operation of Allied Tank #9. For that reason, although we are requesting a hearing on the NOPV and NOA, we believe that the issues raised in those documents can be resolved in a cooperative manner, and we are therefore requesting that any hearing for this matter be postponed at present to allow Colonial and the Eastern Region an opportunity to discuss the matter further.

I. Colonial Response to NOPV Allegations and Statement of Issues re NOPV & NOA

Colonial does not own or operate Allied Terminals, Inc. (ATI) Tank #9 as alleged in the NOPV, or as presumed in issuance of the NOA and the first two of the three suggested amendments to Colonial's procedures. ATI Tank #9 is not a part of the Colonial Pipeline Company pipeline system or pipeline facilities. Since Colonial is not the "Operator" of ATI Tank #9 and the tank is not a part of Colonial's "Pipeline System," the tank is not a pipeline facility subject to the standards and requirements prescribed in 49 C.F.R. Part 195. Colonial therefore is hereby requesting a Hearing pursuant to 49 C.F.R. § 190.11, if the issues cannot be resolved with the Eastern Region in advance, to (i) resolve the issues raised in the NOPV; (ii) contest the penalty issued with the NOPV; (iii) limit the scope of Item 1 in the NOA to Colonial's pipeline system only; and (iv) remove Item 2 of the NOA.

A. 49 C.F.R. Part 195 Scope and Applicability

The premise underlying PHMSA's NOPV and NOA is the allegation that Colonial operated ATI's Breakout Tank 9 pursuant to FERC 68 "Rules and Regulations Tariff Governing the Transportation of Petroleum Products," effective July 21, 2002 (FERC 68). To the contrary, ATI owns and operates a bulk liquids terminal facility at Chesapeake, VA ("the ATI Chesapeake Terminal"), including Tank #9. Colonial operates an interstate pipeline system that makes custody deliveries to the ATI Chesapeake Terminal. The portion of Colonial's pipeline system serving the ATI Chesapeake Terminal terminates at an isolating flange located at the ATI Chesapeake Terminal. From that point, the product transfers to the custody of ATI Chesapeake Terminal to complete delivery into the tankage.

More specifically, ATI is a consignee, defined by the FERC 68 tariff itself as "the party to whom a shipper has ordered the delivery of petroleum product." (FERC 68, Item 5, p. 3). Accordingly, the ATI Chesapeake Terminal and its Tank #9 is not a part of the Colonial pipeline facilities used in the transportation of hazardous liquids as prescribed in §195.0 Scope. Pursuant to an agreement between ATI and a shipper, Colonial delivers transmix to Tank #9, and a ticket is issued to a shipper for each delivery. As such, the standards and reporting requirements prescribed in 49 C.F.R. Part 195 do not apply to the ATI Tank #9 incident.

Colonial does not operate Tank #9 or approve the adequacy of the ATI facilities or the competency of its personnel or the responsibility for the ATI Chesapeake Terminal. PHMSA therefore is without jurisdiction to cite Colonial for issues concerning the operations and maintenance of the tank, or to request that Colonial make amendments to its procedures to address inadequacies of the tank or associated terminal facility.

B. Alleged Operation of Breakout Tank By Colonial

The Notice alleges that "*Breakout Tank 9, owned by Allied Tank, was being operated by Colonial...*" As set forth above, the ATI Tank #9 is not used by Colonial as a "Breakout tank" as defined in §195.2 Definitions. The tank is not used to relieve surges in the Colonial pipeline system or to receive and store hazardous liquids for reinjection and continued transportation by pipeline. Rather, Colonial delivers product to this tank just as it delivers to any other shipper's tank. As such, it is not part of Colonial's pipeline system, and it is not owned, operated, maintained or inspected by Colonial, nor is it required to be under either the Part 195 regulations promulgated by PHMSA or FERC 68. For the same reason, it is neither necessary or appropriate for Colonial to address the first two amendments set forth in the NOA concerning delivery, maintenance or and operating procedures for a shipper or consignee storage tank or terminal facilities.

C. Safe Operation of Colonial's Pipeline System

The ATI Tank #9 level alarm failure was not a condition on the Colonial pipeline system, but instead an issue solely within the control and responsibility of the consignee. Colonial had no authority or obligation to correct the failure of the ATI Tank #9 level alarm within a reasonable time. When Colonial elects or agrees to deliver product into a consignee's receiving tank which has malfunctioning high-level alarms, the consignee must establish a safe operating procedure that is satisfactory to Colonial according to Item 35 of Colonial's Rules and Regulations for terminal facilities, as reflected in FERC 68 (p. 8). It is not Colonial's obligation to do so.

As noted in the NOPV and as addressed in Colonial's response to NOA Item 1 (provided below), Colonial was aware that ATI's tank alarm system was in need of repair a week prior to the delivery at issue. Colonial's own Incident Analysis Report 1A-2006-51 points out additional improvements that Colonial can make with respect to its communication procedures in such a situation, but Colonial cannot control the procedures relied on by the actual operator of the tank: the consignee. Given the particular facts of this incident, Colonial believes that these issues are more appropriately addressed in the NOA, and specifically in NOA Items 2 and 3, as opposed to a NOPV.

II. NOA: Proposed Amendments and Colonial's Responses

Colonial has addressed or plans to address certain alleged inadequacies identified in the NOA pertaining to operation of the pipeline by improving our procedures and communication systems. As to alleged inadequacies identified in the NOA that pertain to the destination terminal facilities and its personnel, however, as explained above in response to the NOPV, Colonial is not in a position to address those issues since Colonial has no authority or responsibility over duties of shippers and consignees to operate and maintain their facilities. Accordingly, and as described above in Section I, Colonial is requesting a Hearing on NOA Items 1 and 2 in that regard.

The text of the NOA is shown below in italics, followed by Colonial's response.

NOA Item 1

On October 17, 2006, representatives of the Virginia State Corporation Commission (VA SCC) under the direction of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Colonial Pipeline Company (CPL) facility at the Hill Street Station in Chesapeake, VA in response to a transmix tank overflow at the Allied Breakout Tank #9.

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

1. §195.401 General requirements.

(b) Whenever an operator discovers any condition that could adversely affect the safe operation of its pipeline system, it shall correct it within a reasonable time. However, if the condition is of such a nature that it presents an immediate hazard to persons or property, the operator may not operate the affected part of the system until it has corrected the unsafe condition.

CPL's Operations and Maintenance Plan (O&M) does not address how delivery operations are to be impacted when tank alarm malfunctions or failures become apparent.

CPL's O&M does not address what constitutes reasonable time for adverse conditions to be corrected and what steps are to be taken when conditions present an immediate hazard conditions.

Colonial Response to NOA Item 1:

It is the duty of the shipper and consignee to monitor, operate and maintain an adequate facility for the safe receipt of the petroleum product into the consignee's tanks. The week before the delivery at issue, Colonial learned that the consignee's tank alarm system needed repair. Colonial was not subsequently advised by consignee Allied Terminal whether repairs had been made, or that there were any conditions that constituted an immediate hazard to persons or property, until the over-fill of the tank was discovered on October 17, 2006. Accordingly, no amendments to Colonial's procedures are necessary or planned to

address the timeliness of repairs at destination facilities.

Nonetheless, Colonial has improved its own procedure for deliveries at Hill Delivery Facility, but cannot effect changes for the shipper or consignee. Colonial's own normal operating procedure NOP-HLD-B01 Delivering Product has been improved by adding a caution to Section 5.0, Batch Change with Transmix Operation to remind the field operator that activation or failure of the Allied transmix tank alarm will require delivery termination. Delivery operations will not resume until the Colonial Operations Manager (OM) and Control Center Operations Manager (CCOM) authorize. The procedure has also been improved by adding Step 5.1 requiring the field operator to obtain the transmix tank gauge level and to verify that adequate space is available for the transmix delivery. These improvements address how delivery operations are to be impacted when tank alarm malfunctions or failures become apparent. A copy of the improved procedure is included as Attachment 1.

NOA Item 2

2. *§195.402 (c) (9) Maintenance and normal operations.*

In the case of facilities not equipped to fail safe that are identified under §195.402(c)(4) or that control receipt and delivery of the hazardous liquid or carbon dioxide, detecting abnormal operating conditions by monitoring pressure, temperature, flow or other appropriate operational data and transmitting this data to an attended location.

CPL's O&M does not address actions to be taken for facilities that are not equipped to fail safe, and which are unmanned after normal business hours.

Colonial Response to NOA Item 2:

The responsibility for maintenance and normal operating procedures for a shipper or consignee storage tank or terminal facilities lies with the shipper or consignee itself, regardless of whether the terminal is a manned or unmanned facility. Colonial's Control Center must rely on a shipper or consignee's ability to operate and maintain its own facility. When the terminal has malfunctioning high-level alarms, the consignee must establish a safe operating procedure, monitor and periodically report the status of delivery conditions to Colonial so that operation of the pipeline can continue.

Colonial has adequate, established procedures and computerized systems for monitoring high-level alarm conditions at shipper-consignee tank facilities including terminal facilities that are unmanned after normal business hours. Accordingly, no revisions to Colonial's procedures are planned to address this part of the Notice.

NOA Item 3

3. *§195.408 Communications.*

(a) Each operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline system.

(b) The communication system required by paragraph (a) of this section must, as a minimum, include means for:

(1) Monitoring operational data as required by §195.402(c)(9);

(2) Receiving notices from operator personnel, the public and public authorities of abnormal or emergency

conditions and sending this information to appropriate personnel or government agencies for corrective action;

CPLs O&M does not include communication procedures to be followed between the Alpharetta, GA control center, CPL local operator, and third-party tank owner/operator during and after making pipeline cuts.

Colonial Response to NOA Item 3:

Colonial has improved its own procedures and information systems that are used for communications between the Alpharetta, GA control center, local Colonial operators, and shipper and/or consignee tank operators during and after making pipeline cuts. An upgraded Customer User Interface (CUI) computerized information system has been deployed to communicate consistent schedule-related operational information to all involved in pipeline operations including shippers and consignees. The CUI displays the "will hold" volumes (tank space available) for delivery at shipper/consignee terminals for reference by the personnel of each party using an internet-based application. Shippers and consignees confirm and "lock" the scheduled delivery to signify that their terminal facilities are ready for the scheduled volume and product to be delivered. The CUI system is synchronized with the batch queue used by controllers and operators to execute pipeline cuts. The features of the CUI have been incorporated into each applicable Colonial operating procedure. Relevant excerpts of the CUI are included as Attachment 2 in order to address your concern regarding Colonial's communication procedures and systems.

For all the above reasons, Colonial believes that the NOPV and associated penalty should be withdrawn, and that the NOA should be revised to limit the scope of Item 1 to Colonial's pipeline system only and to remove Item 2 entirely.

In light of the information Colonial is providing in this Written Response and Request for a Hearing, Colonial believes that it would be beneficial for all parties to discuss the issues raised in the NOPV and the NOA in advance of a hearing, to attempt to reach an amicable resolution. If the issues cannot be resolved in such a meeting, Colonial is hereby preserving its right to request a hearing pursuant to 49 C.F.R. § 190.11, and, at this time, Colonial intends to be represented by counsel at the Hearing.

If you should have any questions concerning any of the information contained herein, please feel free to contact me.

Respectfully,



Doug Belden
Vice President and General Manager - Operations

Attachments

cc: T. C. Felt
G. A. Beck
E. T. Allen
D. Yeager
C. P. Sims
A. M. Taylor



Normal Operating Procedure

DELIVERING PRODUCT

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Purpose

To provide guidelines for delivering product to Customers from the Hill Delivery Facility

Safety and Precautions

1. Products should never be contaminated with incompatible products.
2. If sampling reveals anything questionable about product quality, Controller should be informed immediately.
3. Anytime the Take Off Valve is closed, the Control Valve defaults to manual control and closed position.
4. Hill Control Valve is equipped with a secondary control parameter to limit meter pressure as specified in System Operating Pressure Limits Manual. Use caution NOT to initiate the secondary control.
5. Pipeline and equipment shall be operated within System Operating Pressure Limits Manual requirements.
6. Opening in to Transmix Tank (FGX) per schedule and ticketing purposes is considered a Customer.



References

1. Flow Diagrams
2. Safety Awareness Manual
3. Quality Assurance Manual
4. System Operating Pressure Limits Manual
5. NOP-HLD-F01, Prover System Operation
6. NOP-HLD-H08 Manual Control of Hydraulic Operated Valves

Special Equipment

None

Prerequisites

1. Upon Operator arrival at facility, STATION MANNED indicator activated.
2. A general inspection of yard has been performed and any abnormalities recorded in the Narrative Log and Checklist as applicable.



Procedure

1.0 Open-In

- 1.1. **DISCUSS AND CONFIRM** the following with the Controller:
 - Schedule time
 - Total Volume
 - Batch Code(s)
 - Approximate time to CLOSE-OUT
 - Scada Trend Views
 - Schedule Product Type
 - Scheduled Operations
 - Line/Manifold Wash
- 1.2. **ENSURE** LUI in Dual Mode.
- 1.3. **ENSURE** ALL customer valves CLOSED.
- 1.4. **SELECT** required Customer Valve.
 - 1.4.1. **SELECT** Product Type.
 - 1.4.2. **SELECT** Cut Type Immediate.
 - 1.4.3. **ENSURE** Next Valve Select displays correct information.
- 1.5. **SELECT TRANSFER, AND VERIFY** correct valve setup is FLASHING and CUT button appears.
- 1.6. **SELECT CUT, AND VERIFY** correct Customer Valve and Divider Valve OPEN.
- 1.7. **IF** line wash required:
 - 1.7.1. **SELECT** required Customer Valve for scheduled delivery.
 - 1.7.2. **SELECT** Product Type.
 - 1.7.3. **SELECT** Cut Type (Short, Medium, Long).
 - 1.7.4. **ENSURE** Next Valve Select displays correct information.



- 1.7.5. **SELECT** TRANSFER.
- 1.7.6. **VERIFY** Customer Valve is FLASHING AND CUT button appears.
- 1.7.7. **SELECT** CUT.
- 1.7.8. **VERIFY** Line Wash counter is loaded.

NOTE: Anytime the Take Off Valve is closed, the Control Valve defaults to manual control and closed position.

- 1.8. **WHEN** instructed by Controller OR Batch Change is observed,
OPEN Take Off Valve.
- 1.9. **ENTER / SEND** CV Set Point as directed by Controller.
- 1.10. **VERIFY** flow is established to Customer.
- 1.11. **IF** performing line wash,
ENSURE line wash counter begins to count down.
- 1.12. **WHEN** line wash counter reaches zero (0) OR CUT has been executed,
VERIFY the following:
 - 1.12.1. Next Customer Valve OPEN.
 - 1.12.2. Previous Customer Valve CLOSE.
 - 1.12.3. Flow is established to Customer.
- 1.13. **ENSURE** Counter Switched.
- 1.14. **IF** necessary to switch between Remote Customers after linewash,
SET UP Watch For per Section 2.0.
- 1.15. **IF** meter proving is required,
REFER to NOP-HLD-F01, Prover System Operations.
- 1.16. **IF** desired,
SET Batch Alarm Tool.



2.0 Customer / Ticket Switch (Using Watch For)

NOTE: This section provides instructions for switching to another Customer or performing ticket switch to same Customer.

- 2.1. **ENSURE** LUI in Dual Mode.
- 2.2. **SELECT** required Customer Valve.
 - 2.2.1. **SELECT** Product Type.
 - 2.2.2. **SELECT** Cut Type Immediate.
 - 2.2.3. **ENTER DESIRED** Watch For barrel count to initiate switch.
 - 2.2.4. **SET** Minute Alarm.
- 2.3. **ENSURE** Next Valve Select displays correct information.
- 2.4. **SELECT TRANSFER.**

NOTE: If performing a ticket switch for the same Customer, the existing valve will NOT flash.

- 2.5. **VERIFY** correct Next Customer Valve is FLASHING, **AND COMPARE** to delivery schedule.
- 2.6. **SELECT CUT.**

NOTE: If for some reason a Customer switch has to be made early before a Watch For barrel count total is reached, the EXECUTE NOW button can be used to make the switch.

- 2.7. **IF** switch needs to be made early,
PRESS EXECUTE NOW:
 - 2.7.1. **VERIFY** next Customer Valve OPEN.
 - 2.7.2. **VERIFY** previous Customer Valve CLOSE.
 - 2.7.3. **VERIFY** flow is established to Customer.



- 2.8. **ENSURE** Counter Switched.
- 2.9. **ADJUST** Control Valve as necessary throughout delivery to maintain line parameters.
- 2.10. **IF** meter proving is required,
REFER to NOP-HLD-F01, Prover System Operations.



3.0 Customer / Ticket Switch (NOT Using Watch For)

NOTE: This section provides instructions for switching to another Customer or performing ticket switch to same Customer.

- 3.1. **ENSURE** LUI in Dual Mode.
- 3.2. **SELECT** required Customer Valve.
 - 3.2.1. **SELECT** Product Type.
 - 3.2.2. **SELECT** Cut Type (Immediate, Short, Medium, Long).
 - 3.2.3. **ENSURE** Next Valve Select displays correct information.
- 3.3. **SELECT TRANSFER**.

NOTE: If performing a ticket switch for the same Customer, the existing valve will NOT flash.

- 3.4. **VERIFY** correct Next Customer Valve is FLASHING, **AND COMPARE** to delivery schedule.
- 3.5. **WHEN** desired barrel count is reached, **SELECT CUT**.
- 3.6. **IF** performing line wash, **ENSURE** line wash counter begins to count down.
- 3.7. **WHEN** line wash counter reaches zero (0) **OR** CUT has been executed, **VERIFY** the following:
 - 3.7.1. Next Customer Valve OPEN.
 - 3.7.2. Previous Customer Valve CLOSE.
 - 3.7.3. Flow is established to Customer.
- 3.8. **ENSURE** Counter Switched.
- 3.9. **ADJUST** Control Valve as necessary throughout delivery to maintain line parameters.



- 3.10. **IF** meter proving is required,
REFER to NOP-HLD-F01, Prover System Operations.

- 3.11. **IF** desired,
SET Batch Alarm Tool.



4.0 Batch Change (without Transmix Operations)

NOTE: This section provides instructions for switching to another Customer or performing ticket switch to same Customer.

- 4.1. **ENSURE** LUI in Dual Mode.
- 4.2. **SELECT** required Customer Valve.
 - 4.2.1. **SELECT** Product Type.
 - 4.2.2. **SELECT** Cut Type (Immediate, Short, Medium, Long).
 - 4.2.3. **ENSURE** Next Valve Select displays correct information.
- 4.3. **SELECT** TRANSFER.

NOTE: If performing a ticket switch for the same Customer, the existing valve will **NOT** flash.

- 4.4. **VERIFY** correct Next Customer Valve is FLASHING, **AND** **COMPARE** to delivery schedule.
- 4.5. **WHEN** Batch Change is observed, **SELECT** CUT.
- 4.6. **IF** performing line wash, **ENSURE** line wash counter begins to count down.
- 4.7. **WHEN** line wash counter reaches zero (0) **OR** CUT has been executed, **VERIFY** the following:
 - 4.7.1. Next Customer Valve OPEN.
 - 4.7.2. Previous Customer Valve CLOSE.
 - 4.7.3. Flow is established to Customer.
- 4.8. **ENSURE** Counter Switched.
- 4.9. **ADJUST** Control Valve as necessary throughout delivery to maintain line parameters.



- 4.10. **IF** meter proving is required,
REFER to NOP-HLD-F01, Prover System Operations.

- 4.11. **IF** desired,
SET Batch Alarm Tool.



5.0 Batch Change (with Transmix Operation)

NOTE: This section allows a setup to go into and come out of transmix by setting up one operation. This process is achieved by using the "Cut After Transmix" operation.

CAUTION

Activation or Failure of Allied Transmix Tank Alarms will require delivery termination. Delivery operations will not resume until OM and CCOM authorized.

- 5.1. **OBTAIN** Transmix Tank Gauge Level, **AND** **VERIFY** adequate space available for Transmix Operation.
- 5.2. **DETERMINE** probable Batch Change / Interface time, **AND** **INITIATE** Batch Change Report.
- 5.3. **ENSURE** LUI in Dual Mode.
- 5.4. **ADJUST** Control Valve as directed by Controller.

NOTE: **IF** delivering to a remote customer, the previous remote customer valve must be selected.

- 5.5. **SELECT** required Next Customer Valve (for coming out of Transmix):
 - 5.5.1. **SELECT** Product Type.
 - 5.5.2. **SELECT** Cut Type Immediate.
 - 5.5.3. **SELECT** Cut After Transmix.
 - 5.5.4. **ENSURE** Next Valve Select displays correct information.
- 5.6. **SELECT** TRANSFER, **AND** **VERIFY** Transmix Valve (FGX) is FLASHING.



- 5.7. **WHEN** head end change is observed,
SELECT CUT to switch into Transmix.
- **VERIFY** Transmix Valve (FGX) OPEN.
 - **VERIFY** Previous Customer Valve CLOSE.
 - **VERIFY** flow is established to Transmix.
 - **ENSURE** Counter Switched and Ticket generated.
- 5.8. **VERIFY** correct Next Customer Valve is FLASHING.
- 5.9. **CONTINUE** to MONITOR product Gravity / Flash Point.
- 5.10. **WHEN** tail end change is observed,
SELECT CUT to switch out of Transmix to Next Customer.
- 5.11. **VERIFY** Transmix Valve (FGX) CLOSE.
- 5.12. **VERIFY** flow is established to Customer.
- 5.13. **ENSURE** Counter Switched and Ticket generated.
- 5.14. **IF** required,
NOTIFY Customer that delivery has started.
- 5.15. **IF** required,
PROVIDE Customer with information needed for line displacement.
- 5.16. **IF** meter proving is required,
REFER to NOP-HLD-F01, Prover System Operations.
- 5.17. **ADJUST** Control Valve as directed by Controller.
- 5.18. **IF** necessary,
SET Batch Alarm Tool.
- 5.19. **IF** switching between remote customers,
GO TO Section 2.0.



6.0 Close-Out

- 6.1. **DISCUSS AND CONFIRM** close-out total OR time with the Controller.
- 6.2. **ENSURE** LUI in Dual Mode.
- 6.3. **SELECT** Control Valve (CV).
- 6.4. **ADJUST** Control Valve as directed by Controller.
- 6.5. **CLOSE** Take Off Valve.
- 6.6. **SELECT** Valve Select Close, **AND**
VERIFY Customer Valve and Divider Valve CLOSED.
- 6.7. **ENSURE** Counter Switched and Ticket generated.
- 6.8. **ENSURE** LUI in NORMAL Mode.
- 6.9. **NOTIFY** Controller of the following:
 - Time of close-out
 - Net total barrels delivered for batch



7.0 Batch Change (Field Cut Mode)

NOTE: Batch Change using Field Cut Mode is performed for critical batch changes rather than relying upon gravity meter.
Controller performs all setup functions during Field Cut Mode.

- 7.1. **ENSURE** LUI in Normal Mode.
- 7.2. **VERIFY** BCM valve setup with Controller.
- 7.3. **BEGIN** sampling.

NOTE: **IF** valves fail to reposition correctly, the local Operator must take appropriate steps to ensure proper valve position or follow Controllers instructions.

- 7.4. **WHEN** product gravity/color/flash point is within expected parameters for arriving batch change:
 - 7.4.1. **PRESS** FIELD CUT Pushbutton.
 - 7.4.2. **ENSURE** ALL Valves reposition correctly.

END



Colonial Pipeline Company
Requirements Document

CUI Website Upgrade

Version 1.9

September 15, 2009



Document History

Document:	CUI Website Upgrade
File Name:	CUI Website Upgrade Requirements.doc
Original Author:	Duncan Sinclair
Document Date:	October 31, 2008

Version	Date	Author(s)	Revision Notes
1.0	October 31, 2008	DS/MK	Initial Release
1.1	Nov. 21, 2008	DS	Add Section 3.4 –Email address as per OPIS Performance Improvement Report (PIR)
1.2	Feb. 18, 2009	DMurphy	Add Section 3.5 – Display copy of actual official ticket on-line. Reformat text.
1.3	March 13, 2009	DMurphy	Reformat document
1.4	March 17, 2009	DMurphy	Reformat and merge with Functional Requirements Hart submitted 3/16.
1.5	March 24, 2009	DMurphy	Incorporate 3/20 meeting comments and SCADA Team's feedback.
1.6	April 1, 2009	DMurphy	Final version issued for signatures.
1.7	June 4, 2009	DMurphy	Remove SCADA Batch Queue screenshot, modified section 3.5 to display "A" as well as "L" or blank if Pending, to raise an alarm not change color and to issue warning 1 minute out instead of 30 seconds to Section 3.5. Added "Add Cancel button" to section 3.2.1. Added section 3.6 Locked O&R Report.
1.8	July 17, 2009	DMurphy	<ol style="list-style-type: none">1. Added Will Hold volumes to Section 4 and referenced in Section 5.2. Added 4.2 Schedule Confirmations table.3. Replaced proposed screenshot in 3.2.1. and modified text in 1, 3 and 4.4. Removed SCADA warning when connection lost to Oracle from Section 4.5. Replaced system diagram, Section 1.16. Reordered Section 3.27. Moved and modified Batch Queue Section 3.3.8. Added Section 3.4, Paging Process.9. Moved Approval Signatures to end of document.
1.9	Sept. 15, 2009	DMurphy	Will Hold/Locking rules added. Final version prior go-live for re-signatures.



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1. Overview

The Customer User Interface (CUI) Website is an application that Colonial uses to communicate schedule-related operational information with shippers. Shippers have password-protected access to batch schedule information for their company and their location(s) only.

The purpose of this project is to resolve communication issues on Will Accept (soon to be relabeled "Will Hold") volumes and to provide the customer terminal operator and the controller with the same view of the schedule based on the SCADA batch queue. The upgrade will also allow any changes to the web CUI page or Colonial controllers' batch queue to be propagated to both systems.

The Long Range Schedule, Tickets and Alarms pages on the CUI that shippers view will not be affected by this project.

1.1 System Overview Diagram

When a Colonial pipeline schedule is posted, the CUI website is updated to inform shippers of their upcoming batches. The Confirmations page on the CUI Website has a Schedule section at the bottom that contains this information. The top section of the Confirmations page is the Locked Open & Ready section which is a list of batches shown in the SCADA batch queue screen & an option for the shipper to "Lock" a batch signifying no phone calls are needed before the batch is delivered.

The current system will be modified so all Schedule information is sent to SCADA only, which then updates the CUI. The CUI Confirmations page will no longer provide two displays, but one in order to present the same data the Controllers see to the shippers and terminal operators.

